

**BEFORE A SPECIAL TRIBUNAL UNDER
SECTION 203 RESOURCE MANAGEMENT ACT 1991**

UNDER the Resource Management Act 1991

IN THE MATTER of an application under Part 9 of the Act

AND

IN THE MATTER of an application for a water conservation order at Te
Waikoropupu Springs and associated water bodies

BY **NGĀTI TAMA KI TE WAIPOUNAMŪ TRUST AND
ANDREW YUILL**
Applicants

AND **TASMAN DISTRICT COUNCIL**
Submitter

**MEMORANDUM OF COUNSEL FOR TASMAN DISTRICT COUNCIL
REGARDING SUPPLEMENTARY EVIDENCE OF DR GERBEAUX**

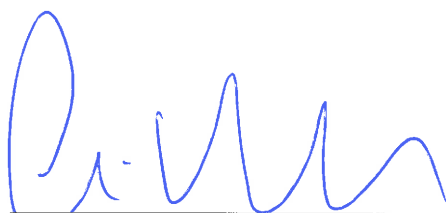
31 July 2018

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MAY IT PLEASE THE SPECIAL TRIBUNAL:

1. This memorandum is filed in respect of the Applicants' proposed NO₃-N limit and the Applicants' request for leave to file additional evidence.
2. The Applicants filed a memorandum, dated 26 July 2018, addressing their position on the NO₃-N limit. They have revised their proposed NO₃-N limit from 0.55mg/L to 0.45mg/L, and sought leave to file a supplementary brief of evidence of Dr Gerbeaux addressing flora in the Springs.
3. Council does not oppose leave being granted for Dr Gerbeaux's supplementary evidence.
4. If leave is granted Council seeks leave to file a further short brief of evidence from Dr Roger Young addressing the matters in Dr Gerbeaux's supplementary evidence. That evidence can be prepared in short order and filed by the end of the week, 3 August 2018.



CP Thomsen

Counsel for the Tasman District Council

31 July 2018