

Before the Hearings Panel

In the Matter of the Resource Management Act 1991

And

In the Matter of the Proposed Marlborough Environment Plan

And

In the Matter of Hearing Block 2 (Topic 5 – Natural Character and
Landscape)

Memorandum of Counsel for Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu providing deed of covenant

Dated: 2 March 2018

May it please the Panel:

1. We act for Te Runanga o Kaikōura and Te Runanga o Ngāi Tahu (**Ngāi Tahu**) in relation to their submission on the proposed Marlborough Environmental Plan.
2. At the hearing on 27 February 2018 Counsel discussed the deed of covenant between Te Runanga o Ngāi Tahu and the Crown in relation to Te Parinui o Whiti (White Cliffs).
3. As requested a copy of the deed of covenant is **attached** to the memorandum.

Dated: 2 March 2018



Joshua Leckie

Counsel for Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu