BEFORE THE COMMISSIONERS APPOINTED ON BEHALF OF CENTRAL OTAGO DISTRICT COUNCIL

Under	The Resource Management Act 1991 (the **Act**)
In the Matter	an application for subdivision and consents and boundary adjustment RC250259
Between	**AO MARAMA LIMITED** **Applicant**
And	**CENTRAL OTAGO DISTRICT COUNCIL** **Local Authority**

MEMORANDUM OF COUNSEL ON BEHALF OF AO MARAMA LIMITED IN RESPONSE TO MINUTE THREE

DATED 23 OCTOBER 2026

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MEMORANDUM OF COUNSEL ON BEHALF OF AO MARAMA LIMITED

May it please the Commissioners:

1. Counsel requests an amendment to the directions from the Panel in Minute 3 dated 13 October 2026 regarding the filing date for the Ecological Management Plans.

2. Counsel seeks an extension from the original filing date of 18 November 2026 by 10 working days.

3. The extension is sought because the Ecologist and Herpetologist engaged to prepare the Ecological Management Plans have advised they will be unable to meet the current deadline due to workflow pressure that has since arisen arising from other Fast Track projects.

4. The Applicant has explored whether other experts would be available, but none could deliver the requested work any sooner for similar reasons.

5. On this basis Counsel respectfully seeks that the Panel directions be amended so that the Applicant files their response by 4 December 2026.

Dated 23 October 2026



Bridget Irving / Hannah Perkin

Counsel for Ao Marama Limited