

**Before Commissioners
Appointed by the Marlborough District Council**

Under the Resource Management Act 1991

In the matter of Variations 1 and 1A to the Proposed
Marlborough Environment Plan

MEMORANDUM OF COUNSEL FOR THE MCGUINNESS INSTITUTE

11 JANUARY 2022

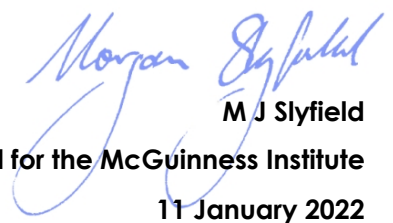
Counsel Acting

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May it Please the Commissioners

1. During the presentation of submissions on behalf of the McGuinness Institute, on 18 November 2021, counsel responded to two questions from the Commissioners.
2. The McGuinness Institute has considered those questions further, and wishes to provide additional information to supplement the responses made by counsel. Both the questions and the additional information are set out in the attached document prepared by the Institute.
3. To the extent that leave is required in order for the Commissioners to receive this information, then leave is sought, on the basis that the information more fully responds to the Commissioners' questions, and no party would be prejudiced by the Commissioners receiving this information.


M J Slyfield
Counsel for the McGuinness Institute
11 January 2022