IN THE WAITANGI TRIBUNAL

OF NEW ZEALAND

WAI 1040
WAI 2003

IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	Te Paparahi o Te Raki Inquiry
AND	
IN THE MATTER OF	a claim by Cheryl Turner and others on behalf of Ngati Korokoro Ngati Wharara and Te Pouka Hapu

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MEMORANDUM OF COUNSEL
Dated this 18th day of November 2013

RECEIVED
Waitangi Tribunal
18 Nov 2013
Ministry of Justice
WELLINGTON

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May it please the Tribunal:

1. This memorandum is filed following the Tribunal's directions for submissions in response to the Local Issues Research Review undertaken by Chief Historian Richard Moorsom (Wai 1040, #6.2.13, "the review").

2. Counsel acts for the Wai 2003 claimants, on behalf of Ngati Korokoro, Ngati Wharara, Te Pouka hapu ("Nga Hapu o Te Wahapu") and made submissions seeking that targeted research be undertaken on various issues associated with the Hokianga Harbour (by memorandum dated 22 February 2013, Wai 1040, #3.1.897).

3. At page 70 of the review, Mr Moorsom comments:

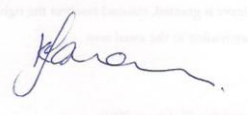
> "A sub-regional study targeted on selected aspects of environmental ownership, management and control would contribute to a more integrated understanding of the distinctive characteristics of Hokianga as an estuary and catchment. The study could best focus on the period since the Resource Management Act 1991."

4. The recommendations for targeted research on the Hokianga Harbour set out in the review at Item 1.9 in Table 2 are welcomed. It is submitted that on the basis of the thorough review undertaken by Mr Moorsom, his recommendation should be accepted and the commissioning of such research be undertaken as soon as possible.

5. It is further submitted that the Tribunal also accept Mr Moorsom's further recommendations for the commissions set out in Table 2 which refer to:

    a. Additional mapping (Item 5.1); and
    b. The matters at Items 1.1-1.12.

Dated at Kerikeri this 18th day of November 2013



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