

**IN THE ENVIRONMENT COURT
AT WELLINGTON**

ENV-2019-WLG-000132

IN THE MATTER of Resource Management Act 1991 (“the Act”)

AND

IN THE MATTER of an appeal pursuant to Clause 14(1) of the First
Schedule to the Act

BETWEEN **FIRST GAS LIMITED**

Appellant

AND **GREATER WELLINGTON REGIONAL COUNCIL**

Respondent

MEMORANDUM OF COUNSEL ON BEHALF OF APPELLANT

Dated 19 November 2019

Govett Quilliam
THE LAWYERS

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MAY IT PLEASE THE COURT

1. First Gas Limited ("First Gas") has filed an appeal on the decision of the Greater Wellington Regional Council ("Council") on the Proposed Natural Resources Plan.
2. We refer to the memorandum of counsel on behalf of the Council regarding management of the appeals against the Proposed Natural Resources Plan dated 8 November 2019.
3. First Gas agrees with the suggested approach set out in the Council's memorandum.
4. Accordingly, First Gas respectfully requests leave not to attend the pre-hearing conference scheduled for 20 November 2019. First Gas will abide by any timetabling or case management directions made by the Court at the pre-hearing conference.

DATED at New Plymouth this 19th day of November 2019



L P Wallace / R E Eaton
Counsel for First Gas Limited