

Before the Hearing Panel

Under the Resource Management Act 1991
In the matter of the Greater Wellington Proposed Natural Resources Plan – Hearing
Stream Two – Air quality management, land use in riparian margins and stock
access to water bodies and soil conservation

Between

Greater Wellington Regional Council

Local Authority

and

CentrePort Limited

Submitter 121 and Further Submitter 40

and

CentrePort Properties Limited

Submitter 141 and Further Submitter 49

Memorandum of Counsel on behalf of CentrePort Limited and CentrePort Properties Limited

29 June 2017

BELL GULLY

BARRISTERS AND SOLICITORS

A J L BEATSON

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MAY IT PLEASE THE PANEL

1. Legal counsel and expert witnesses Mr Lindsay Daysh and Mr William Woods are scheduled to appear before the Panel for Hearing 2 on 17 July 2017 on behalf of CentrePort Limited and CentrePort Properties Limited (**CentrePort**).
2. Mr Daysh and Mr Woods have both pre-circulated relatively brief statements of evidence for this hearing. However, Mr Daysh will be on leave and is unable to appear before the Panel on this date (or any other scheduled hearing date).
3. It appears to us that there are two possible ways to deal with this timing issue – one would be for another planning expert to appear at the hearing and adopt the evidence from Mr Daysh, and the second (and our preferred) method would be for Mr Daysh's evidence to be accepted by the Panel and if there are questions arising from that, for the Panel to raise such matters and any response to be provided, in writing.
4. Accordingly, we respectfully request that the Panel grants leave for Mr Daysh's evidence to be accepted, and for Mr Daysh to receive and answer any questions the Panel may have in writing.



A J L Beatson
Counsel for CentrePort Limited and CentrePort Properties Limited

29 June 2017