

Before Greater Wellington Regional Council

Under the Resource Management Act
1991

In the matter of the Proposed Natural Resources
Plan for the Wellington Region

And

In the matter of Submissions (S135) and Further
Submissions (FS25) by **Wellington
Water Limited**

**MEMORANDUM OF COUNSEL SEEKING EXTENSION OF TIME FOR FILING
EXPERT EVIDENCE FOR HEARING STREAM 3**

19 July 2017

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1. This memorandum seeks a one week extension of the date for filing expert evidence by one of Wellington Water Ltd's experts for Hearing Stream 3 (Water Allocation and Natural Form and Function). The expert evidence is due to be filed by 21 August 2017, with the hearing due to commence on 4 September 2017.
2. Water Allocation is one of the main topics of Wellington Water's submissions, and will be addressed by it in considerably more detail than the topics in Hearing Streams 1 and 2.
3. One of Wellington Water's experts will describe the water supply network (including its constituent parts, current water permits, current and projected demands, and how the network is managed), issues that arise from relevant PNRP provisions, and particular concerns with protection of the Hutt Aquifer, and provisions for works in stream beds and wetlands.
4. The expert who was to have given this evidence was Wellington Water's Chief Advisor, Potable Water. However, in mid-May 2017 he resigned, and he will no longer be available to give the evidence.
5. The only other individual sufficiently knowledgeable and qualified as a substitute is Wellington Water's Chief Advisor, Services Planning, Mr Robert Blakemore. He is working on preparing the requisite evidence. However, Mr Blakemore is travelling overseas from 21 July to 21 August, which will make it difficult to complete and file his evidence on time, and will mean his evidence cannot in any event respond to the recommendations in the s42A reports.
6. For those reasons, Wellington Water seeks leave to file Mr Blakemore's evidence by 28 August 2017. It is respectfully submitted that this delay is unlikely to prejudice any other party, and should allow sufficient time for the Panel to read and consider Mr Blakemore's evidence in advance of the hearing. All other expert evidence for Wellington Water would be filed as per the timetable, on 21 August 2017.


M J Slyfield
19 July 2017