

**BEFORE THE ENVIRONMENT COURT
AT WELLINGTON**

**ENV-2019-WLG-000124,
ENV-2019-WLG-000103,
ENV-2019-WLG-000108 and
ENV-2019-WLG-000130**

UNDER

Clause 24, Schedule 1 of the
Resource Management Act

IN THE MATTER

of appeals on the Proposed
Natural Resources Plan

BETWEEN

**WINSTONE AGGREGATES
(formerly known as GBC
Winstone)**

Appellant

AND

**WELLINGTON REGIONAL
COUNCIL**

Respondent

**MEMORANDUM OF COUNSEL ON BEHALF OF WINSTONE
AGGREGATES**

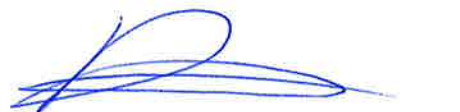
Dated: 19 November 2019

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MAY IT PLEASE THE COURT:

1. Counsel for Winstone Aggregates (formerly GBC Winstone) only received instructions in this matter on 15 November 2019 and understands that this matter is scheduled for a case management conference before Judge Dwyer on Wednesday, 20 November 2019.
2. Winstone Aggregates is both an appellant (ENV-2019-WLG-000124) and a section 274 party to the Transpower (ENV-2019-WLG-000108) and the Royal Forrest and Bird Protection Society Incorporated (ENV-2019-WLG-000130) and Horticulture New Zealand appeals (ENV-2019-WLG-000103).
3. It is requested that both Ms Ryder-Lewis (as instructing solicitor) and counsel's details be added to the contact list for the appeals and address for service details be updated.
4. Counsel is unable to attend the case management conference and seeks to be excused. Winstone Aggregates will be represented at the conference by their planning expert, Ms Sylvia Allan. Ms Allan is familiar with the case and will be able to address any queries the Court may have.
5. Counsel apologises for the slight delay in filing this memorandum due to having been recently instructed.
6. Counsel had the opportunity to consider the directions made by His Honour Judge Dwyer on 26 September 2019 and proposed a way forward circulated by counsel for Greater Wellington Regional Council (GWRC) on 8 November 2019.
7. Winstone Aggregates agree with GWRC's suggested approach to advance the appeals and have no further issues to raise.

**Phernne Tancock**

Counsel for Winstone Aggregates
(Formerly GBC Winstone)