

**IN THE ENVIRONMENT COURT  
WELLINGTON REGISTRY**

ENV-2016-WLG-000058

**Under** section 274 of the Resource Management Act 1991

**In the matter** of the Resource Management Act 1991 of Notice of Motion under section 87G requesting the granting of resource consents to **WELLINGTON INTERNATIONAL AIRPORT LIMITED** for the Wellington International Airport Extension of Runway: Construction, Operation and Maintenance

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**MEMORANDUM OF COUNSEL FOR  
SURFBREAK PROTECTION SOCIETY INCORPORATED  
13 April 2018**

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**MAY IT PLEASE THE COURT:**

1. This memorandum is filed on behalf of Surfbreak Protection Society Incorporated (SPS) in response to the Eighteenth Minute of the Environment Court (19 March 2018) – more particularly paragraph 7) thereof.
2. SPS has had the benefit of reading in advance the submissions filed today for Guardians of the Bay Incorporated and, in the interests of brevity, supports those submissions for the reasons set out therein (in the context of the original submissions filed for SPS).

Dated at New Plymouth this 13th April 2018



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S W A Grieve  
Counsel for SPS