

**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 GUARDIANS OF THE  
BAYS INCORPORATED UPDATING WITNESS SCHEDULE**  
8 February 2017

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**May it please the Court:**

**Introduction**

- 1 This memorandum is filed by counsel for Guardians of the Bays Incorporated (**GOTB**) further to its memorandum of counsel dated 7 February 2017. It is supported by Hue tē Taka Incorporated (**HtT**) and the Surfbreak Protection Society Incorporated (**SPS**).
  
- 2 In its memorandum dated 7 February 2017, counsel indicated the witness schedules attached to that memorandum were subject to further amendments. Counsel has now received these anticipated amendments and attaches updated witness schedules for GOTB, HtT, and SPS at **Schedule A**. Counsel requests these updated witness schedules replace those attached to its memorandum dated 7 February 2017.

**DATED** 8 February 2017



J D K Gardner-Hopkins / C R Gubb

**Counsel for Guardians of the Bays Incorporated**

**Schedule A**

**Guardians of the Bays Inc.**

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**List of Expert Witnesses**

- 1 Professor Tim Hazeldine – Economics
- 2 Stephen Brown – Natural Character and Landscape
- 3 Paul Kennedy – Coastal ecology
- 4 Malcolm Hunt – Noise
- 5 Hamish Rennie – Planning
- 6 Professor James Renwick – Climate Change

**List of Lay Witnesses**

- 1 Dr Sea Rotmann – Community representative, amenity and recreational impacts, marine ecology
- 2 Martyn Howells – Community representative
- 3 Elise Webster – Community representative
- 4 Leigh Hunt – Community representative, kai moana gatherer
- 5 Stan Andis – Community representative, noise effects
- 6 Susan Hanieal – Community representative, tsunami risk

**Hue tē Taka Inc.**

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**List of Expert Witnesses**

- 1 Stephen Brown – Natural Character and Landscape
- 2 Malcolm Hunt – Noise

**List of Lay Witnesses**

- 1 Dr Sea Rotmann – Community representative, amenity and recreational impacts, marine ecology
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**Surfbreak Protection Society Inc.**

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**List of Expert Witnesses**

- 1 Dr Shaw Mead - Environmental Scientist / Consultant.
- 2 Dr Hamish Rennie - RMA planner.

**List of Lay Witnesses**

- 1 Paul Shanks - President of the Surfbreak Protection Society Incorporated (SPS).
- 2 Mark Shanks - SPS Committee Member, Wellington surfer resident, and life member of Surfing New Zealand.
- 3 Gary Hurrying - Local surfer / NZ Olympic and Commonwealth swimmer.
- 4 Allen Pidwell QSM - SPS committee member / experienced surfer.
- 5 Carol Quirk QSM - Lyall Bay surf lifesaver; life member of Surf Lifesaving New Zealand.
- 6 Michael Gunson - SPS Administration officer/ experienced Lyall Bay surfer.