

**Before the Environment Court  
at Wellington**

In the Matter of section 87G of the Resource Management Act 1991

And

In the Matter of the direct referral of an application for resource consents  
associated with an extension to the runway by Wellington  
International Airport Limited

(ENV-2016-WLG-00058)

**Memorandum of Counsel for  
Wellington International Airport Limited**

Dated: 19 December 2016

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**May it please the Court:****Introduction**

1. This memorandum is filed on behalf of Wellington International Airport Limited (**WIAL**) as directed by the Minute of the Court dated 2 December 2016.
2. By 19 December 2016 WIAL was directed to file:
  - (a) a list of witnesses it proposes to call at the hearing together with the subject matter of their evidence;
  - (b) a suggested process timetable for a tentative hearing in June 2017; and
  - (c) a suggested agenda for the Judicial Conference in the week of 7 February 2017.

**Witnesses to be called by WIAL**

3. WIAL currently proposes to call evidence from the following witnesses in support of its application:

<b>Evidence Subject Matter</b>	<b>Witness</b>
Corporate (WIAL)	Steven Sanderson Matt Clarke Mike Vincent Mike Brown
Economics/Forecasting	Alex Welch Dr Mike Tretheway Dr Kieran Murray
Engineering/Hazards	Philip Hadfield Marty Czarnecki Dr Paul Somerville
Transportation	Mark Georgeson

	Tim Kelly
Landscape/Natural Character/Urban Design	Gavin Lister Frank Boffa Marc Baily Boyden Evans
Noise – Operational	Laurel Smith
Noise - Construction	Darran Humpheson
Air Discharge	Andrew Curtis
Ecology/Coastal Processes	Rob Bell Alison MacDiarmid David Thompson Mark James
Archaeological	Kevin Jones
Wave Climate/Surf Quality	Simon Brandi Mortenson
Recreation	Rob Greenaway
Planning	John Kyle

#### Proposed Process Timetable

4. WIAL proposes the following process timetable for consideration at the Judicial Conference:

Date	Process
17 February 2017	All parties to formally identify issues and witnesses to be called
Week of 27 February 2017	Any mediation suggested by the Court (to finalise issues and/or narrow the issues in contention; reach agreement)
17 March 2017	Applicant to exchange its evidence
31 March 2017	Councils to exchange its evidence

21 April 2017 (includes Easter)	Section 274 parties to exchange their evidence
Weeks of 1 May 2017 and 8 May 2017	Expert conferencing and joint witness statements to be produced
Week of 15 May 2017	Any further mediation if required
26 May 2017	Rebuttal evidence to be exchanged
12 June 2017	Hearing commences(tentative)

### Proposed Agenda for Judicial Conference

5. The following draft agenda is suggested by WIAL for the Judicial Conference scheduled in the week of 7 February 2017:
- (a) attendances and representation (following the process advisors conference(s));
  - (b) whether persons and bodies having similar interests should be encouraged to have joint representation;
  - (c) any preliminary issues raised by the parties;
  - (d) discussion of issues and witnesses of the parties to obtain better particulars of the case of each party;
  - (e) discussion of proposed timetable including any suggestion about the time and place of the hearing, the procedure to be followed at the hearing and the likely duration of hearing;
  - (f) discussion and confirmation regarding filing and serving of documents/evidence;
  - (g) discussion regarding exhibits, agreed file of documents and maps/planning documents; and
  - (h) any other relevant matters on which arrangements should be made or directions given to ensure the fair, orderly and efficient hearing of the proceedings.

6. It is submitted that it would be beneficial if any party who wishes to comment on or add any matter to the proposed agenda provides these comments in advance of the Judicial Conference, so all parties and the Environment Court have an opportunity to consider them.

Dated: 19 December 2016



Amanda Dewar

**Solicitor for Wellington International Airport Limited**

