

Under the Resource Management Act 1991

In the matter of notice of motion under s 87G requesting
the granting of resource consents an
appeal pursuant to s 121 of the Act

By **Wellington International Airport Ltd**
Applicant

Memorandum of Counsel for various s 274 parties

8 February 2017

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MAY IT PLEASE THE COURT

1. This memorandum raises for consideration an issue not covered in the agenda set out in the Court's eighth Minute dated 7 February 2016.
2. I have been engaged to assist a number of section 274 parties who support the application, including:
 - Property Council New Zealand
 - Wellington Regional Stadium Trust
 - Tourism Industry Aotearoa Hotel Sector
 - Ernst & Young, and
 - Wellington Phoenix FC.
3. These parties do not intend to call expert evidence (though they may adopt and rely on the expert evidence of others). However, their submissions comprise both statements of fact (about their respective industry or enterprise, and the significance of air travel to them) and statements of position (about their support for the project). It may be appropriate for the former to be provided to the Court in the form of statements of evidence of a non-expert nature. I raise for consideration whether a date in the evidence exchange timetable should be allowed for such non-expert statements to be filed.



M J Slyfield
8 February 2017