

**Before a Board of Inquiry
Northern Corridor Improvements Project**

**Under
("RMA")**

of the Resource Management Act 1991

In the matter of

a Board of Inquiry appointed under section 149J of the RMA to consider notices of requirement for designations and resource consents applications by the New Zealand Transport Agency for the Northern Corridor Improvements Project

Memorandum of counsel for Watercare Services Limited

12 June 2017



Simpson Grierson
Barristers & Solicitors

Padraig McNamara / Ann Maddox
Telephone: +64-9-977 5032
Facsimile: +64-9-307 0331
Email: Ann.Maddox@simpsongrierson.com
DX CX10092
Private Bag 92518
Auckland

MAY IT PLEASE THE BOARD:

1. We act for Watercare Services Limited (**Watercare**) in the above matter.
2. Further to the Board of Inquiry's (**BOI**) email of 8 June 2017, Watercare confirms:
 - a. That it wishes to speak at the hearing;
 - b. That its witnesses have no periods of unavailability;
 - c. That it intends to make short opening and closing statements;
 - d. That it does not intend to use any electronic media;
 - e. That it does not wish to present via video conference;
 - f. That it does not require an interpreter; and
 - g. That it does not wish to cross-examine any witnesses.
3. Further to Board Minute and Direction 06: Timetable for Conferencing (08 June 2017), Watercare also requests that its planning witness, Philip Mitchell, be excused from attending the expert planning witness conference scheduled to take place on 30 June 2017. Watercare has reached agreement with the New Zealand Transport Agency regarding the conditions that are to be put forward to the Board regarding the potential effects of the project on the Rosedale Wastewater Treatment Plant site. Therefore there are no outstanding planning issues requiring resolution that involve Watercare.



Padraig McNamara / Ann Maddox
Counsel for Watercare Services Limited