

**BEFORE THE HEARING COMMISSIONERS  
AT PALMERSTON NORTH**

**IN THE MATTER** of the Resource Management Act 1991  
(the Act)

**AND**

**IN THE MATTER** of a review by **PALMERSTON NORTH CITY  
COUNCIL** of the conditions of consent for  
Te Rere Hau Windfarms under section  
128 of the Act

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**MEMORANDUM OF COUNSEL FOR NZ WINDFARMS IN RELATION TO  
MEMORANDUM FILED BY MR HILL  
16 OCTOBER 2017**

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**MAY IT PLEASE THE COMMISSIONERS:**

1. Counsel refers to the memorandum filed by Mr Hill earlier today. In that memorandum Mr Hill raised concerns about whether:
  - (a) NZ Windfarms had consulted with PNCC prior to the filing of its conditions on 10 October 2017; and
  - (b) Submitters were to be given an opportunity to comment following receipt of PNCC's views on conditions.
2. The conditions filed on 10 October 2017 were NZ Windfarms proposed conditions. Consultation was not able to be completed with PNCC prior to filing. However, under the current timetable comments from both PNCC and submitters were due on the same date (13 October 2017).
3. It is understood that counsel for PNCC is intending to file a memorandum setting out its comments on conditions tomorrow.
4. To address the concerns raised by Mr Hill and to recognise the extension already requested by counsel for PNCC, NZ Windfarms suggests that the current timetable be amended as follows:
  - (a) 17 October 2017 – PNCC to provide its response to conditions;
  - (b) 20 October 2017 – Submitters to provide any further responses to conditions;
  - (c) 27 October 2017 – Joint memorandum of counsel for PNCC and NZ Windfarms due addressing the matters set out in paragraph 12 of the Panel's 21 September 2017 Minute;
  - (d) 1 November 2017 – Hearing to close; and
  - (e) 22 November 2017 – Decision of the Panel to be issued.
5. It is understood that PNCC has no objection to the above proposed timetabling amendments.

Dated this 16<sup>th</sup> day of October 2017



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**Vicki Morrison-Shaw**

Legal Counsel for **NZ Windfarms Ltd**