

**BEFORE AN INDEPENDENT HEARINGS PANEL APPOINTED BY NORTHLAND  
REGIONAL COUNCIL AND WHANGAREI DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991 (**RMA**)

**IN THE MATTER OF** of an application by Northport Limited for all necessary resource consents to enable the expansion of Northport's existing facilities and support Northport's transition into a high-density container terminal (application numbers WDC: LU2200107 and NRC: APP.040976.01.01)

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**MEMORANDUM OF COUNSEL FOR CHANNEL INFRASTRUCTURE NZ  
LIMITED REQUESTING EXTENSION OF EXPERT EVIDENCE DEADLINE**

**DATED 12 SEPTEMBER 2023**

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**MinterEllisonRuddWatts.**

PO Box 105 249 Auckland City 1143  
T +64 9 353 9700

Solicitor acting: Holly-Marie Noone | holly-marie.noone@minterellison.co.nz  
Partner responsible: Stephanie de Groot | stephanie.degroot@minterellison.co.nz

## MAY IT PLEASE THE PANEL

1. This memorandum has been prepared on behalf of the submitter, Channel Infrastructure NZ Limited (**Channel**). We refer to Directions No. 3, No. 4 and No. 5 of the Hearing Panel dated 21 August 2023, 25 August 2023 and 4 September 2023 (the **Directions**) relating to the exchange of expert evidence.
2. Direction No. 3 extended the time for the applicant, Northport Limited (**Northport**) to file its evidence from 24 August to 28 August 2023, which Northport has met with the filing of their evidence and an updated set of proposed conditions on 28 August 2023.
3. Channel requests a commensurate extension of two working days to file its expert evidence, on the following basis:
  - (a) Northport is the only potentially affected party, and their counsel's memorandum seeking an extension acknowledged that Northport would be willing to agree to a similar extension for submitter evidence;
  - (b) Patuharakeke Te Iwi Trust and the Director-General of Conservation have each been granted an extension of two working days to file their expert submitter evidence;
  - (c) There is a significant volume of information and conditions to be reviewed and considered by experts producing evidence in relation to Northport's application in a relatively short timeframe; and
  - (d) Channel's expert navigation witness is currently overseas for work and the provision of further time would assist in finalising his statement of evidence.
4. We would be happy to elaborate further as required.



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**Stephanie de Groot / H-M Noone**  
Counsel for Channel Infrastructure NZ Limited