

**BEFORE THE WHANGAREI DISTRICT COUNCIL AND NORTHLAND
REGIONAL COUNCIL**

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

AND

IN THE MATTER of a resource consent application by Northport Limited
under section 88 of the Resource Management Act 1991
for a port expansion project at Marsden Point

APPLICATION NO. Whangarei District Council: LU2200107
Northland Regional Council: APP.040976.01.01

**MEMORANDUM OF COUNSEL FOR THE DIRECTOR-GENERAL OF
CONSERVATION REQUESTING EXTENSION OF EVIDENCE DEADLINE**

4 September 2023

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MAY IT PLEASE THE HEARING PANEL:

Introduction

1. This memorandum of counsel has been prepared on behalf of the submitter, the Director-General of Conservation (**DGC**). It refers to Directions No. 3 and No. 4 of the Hearing Panel dated 21 August 2023 and 25 August 2023 respectively (the "Directions").
2. Direction No. 3 extended the time for the Applicant to file its evidence from 24 August to 28 August 2023, which the applicant has met with the filing of their evidence on 28 August 2023.
3. Direction No. 4 granted an extension of time for Patuharakeke Te Iwi Trust for a commensurate extension of two working days to file its expert submitter evidence.
4. The DGC requests a commensurate extension of two working days to file its expert submitter evidence, on the following basis:
 - a) Northport is the only potentially affected party, and their counsel's memorandum seeking an extension appropriately acknowledged that Northport Ltd would be willing to agree to a similar extension for submitter evidence;
 - b) Patuharakeke Te Iwi Trust have been granted an extension of two working days to file its expert submitter evidence;
 - c) DGC's expert witnesses and counsel have also had very heavy workloads in their respective areas.
5. I would be happy to elaborate further as required.



S Bradley
Counsel for the Director-General of Conservation