BEFORE THE WHANGĀREI DISTRICT COUNCIL AND NORTHLAND REGIONAL COUNCIL

IN THE MATTER	of the Resource Management Act 1991
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. APP.005055.38.01

LU 2200107

MEMORANDUM OF COUNSEL FOR NORTHPORT LIMITED RESPONDING TO

HEARING PANEL DIRECTION 15

22 February 2024

Counsel instructed: Kitt Littlejohn Quay Chambers Level 7 2 Commerce Street Auckland 1010 Solicitors acting: CH Simmons / SJ Mutch ChanceryGreen 223 Ponsonby Road Auckland 1011



MAY IT PLEASE THE PANEL

- 1. In its Direction 15,¹ the Hearing Panel sought information/clarification on certain specified matters relating to stormwater.
- 2. In response to Direction 15, Reyburn & Bryant have prepared a letter comprehensively addressing the information sought. A copy of that letter (excluding attachments) is attached as **Annexure A**. Due to the size of the various attachments, a full copy of the letter including attachments is available on Dropbox <u>here</u>.
- 3. Should the Hearing Panel have any remaining/outstanding queries in relation to this matter, we would be happy to provide further clarification.

Dated: 22 February 2024

Chris Simmons Counsel for Northport Limited

¹ Dated 1 December 2023.

ANNEXURE A: REYBURN & BRYANT LETTER RESPONDING TO DIRECTION 15 (EXCLUDING ATTACHMENTS)

[See attached document.]