

Before an Independent Hearings Panel

The Proposed Auckland Unitary Plan

Under the Resource Management Act 1991 (the RMA) and the
Local Government (Auckland Transitional Provisions)
Amendment Act 2013 (the Act)

In the matter of a submission by the New Zealand Transport Agency
(submitter number 1725) on the proposed Auckland Unitary
Plan

and in the matter of Topic 006: RPS Natural Resources

Memorandum of counsel for the New Zealand Transport Agency regarding the pre-hearing meeting for Topic 006: RPS Natural Resources

Dated 25 September 2014

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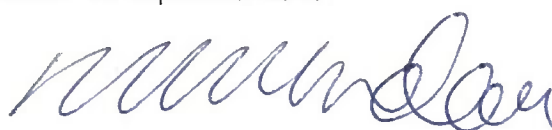
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May it please the Panel:

- 1 This memorandum comprises the RSVP by the New Zealand Transport Agency ('**Agency**') to the pre-hearing meeting for Topic 006: RPS Natural Resources, which is scheduled for Thursday 2 October 2014.
- 2 The Agency agrees with the pathway for its submissions set out in the Parties and Issues Reports for sub-topics:
 - a Air;
 - b Groundwater and Freshwater:
 - c Land – contaminated; and
 - d Natural Hazards.
- 3 However, the Agency suggests the further submitter Kindercare Learning Centres (2164), which lodged a submission in opposition to the Agency's primary submission, may have been incorrectly coded, and would be more appropriately discussed in later topics (perhaps topics 065 (definitions) and 035 (air quality)).
- 4 The Agency will be attending the pre-hearing meetings for these sub-topics. Ms Natalie Amos will appear on behalf of the Agency.
- 5 The Agency intends to call the following expert witnesses, at the hearing commencing on Tuesday 25 November 2014:

Expert witness	Expertise
Lesley Hopkins	Planning
Camilla Needham	Air
David Greig	State highway operational matters

Dated 25 September 2014



Nicky McIndoe

Counsel for the New Zealand Transport Agency