

**BEFORE AN INDEPENDENT HEARING COMMISSIONER FOR WAITOMO
DISTRICT COUNCIL**

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

AND

IN THE MATTER of an application by Taumatotara Wind Farm Limited to
change conditions of a land use consent for the
Taumatotara Wind Farm

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

Dated 2 November 2023

Counsel for the Director-General of Conservation:

Michelle Hooper
Department of Conservation/Te Papa Atawhai
Private Bag 3072
HAMILTON
Telephone: 027 324 6314
Email: mhooper@doc.govt.nz

MAY IT PLEASE THE COMMISSIONER:

1. Minute 4 amended the evidence exchange timetable as follows:
 - a) Council's section 42A report 4pm on Friday 13 October 2023;
 - b) The applicant's expert evidence except for planning 4pm Friday 20 October 2023;
 - c) The applicant's planning evidence 4pm Thursday October 2023;
 - d) The submitter's expert evidence 4pm Tuesday 7 November 2023;
 - e) Written material from any submitter not calling expert evidence 4pm Friday 10 November 2023;
 - f) Opening legal submissions 4pm Saturday 11 November 2023.

2. The Director-General requests an extension of 1 working day for the Director-General to file her submitter expert evidence for the following reasons:
 - a) The Applicant's expert evidence was not available until Wednesday 25 October 2023 and the Applicant's planning evidence was not available until Friday 27 October 2023.

 - b) The Director-General's expert ecologist has been balancing her work in the field with the work required for her to write her evidence. She is in the field this week and had planned to work on her evidence in the afternoons. However, while she has access to the internet at her current location, she does not have access to power. This has meant that her work on her evidence this week has been limited by the amount of power left in her computer battery. She will have access to power again by the weekend.

3. I would be happy to elaborate further as required.



M Hooper
Counsel for the Director-General of Conservation