

BEFORE INDEPENDENT HEARING COMMISSIONERS

IN THE MATTER OF of the Resource Management Act 1991

AND

IN THE MATTER OF of the hearing of submissions on Proposed Variation 2
(Hinds Plain) to the Proposed Canterbury Land and
Water Regional Plan

**MEMORANDUM OF COUNSEL ON BEHALF OF MAYFIELD HINDS IRRIGATION
LIMITED**

Dated: 14 July 2015

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MAY IT PLEASE THE COMMISSIONERS:

- 1 In preparation for the hearing of submissions on proposed Variation 2 (Hinds Plain) to the proposed Canterbury Land and Water Regional Plan on Thursday, 16 July 2015 (**the Hearing**) Counsel for Mayfield Hinds Irrigation Limited (**MHIL**) asked its witnesses whether they intended making any corrections to their evidence at the Hearing.
- 2 Most witnesses have responded with only a few corrections, if any. However, Mr Everest has identified several items of correction.
- 3 In order to assist the Commissioners we considered it may be helpful to set out the corrections to the Brief of Evidence of Phillip Graham Everest dated 15 May 2015 (**Mr Everest's Brief**) prior to the Hearing.
- 4 Therefore, filed with this Memorandum of Counsel is a Statement of Corrections to Mr Everest's Brief, which he intends to present on 16 July at the scheduled appearance for MHIL.

Dated this 14th day of July 2015



Alanya Limmer / Catherine McCallum

Counsel for Mayfield Hinds Irrigation Limited