

Before Independent Hearings Commissioners Appointed by Canterbury Regional Council and Selwyn District Council

In the matter of The Resource Management Act 1991

And

In the matter of Applications by **Fulton Hogan Limited** for all resource consents necessary to establish, operate, maintain and close an aggregate quarry (**Roydon Quarry**) between Curraghs, Dawsons, Maddisons and Jones Roads, Templeton

**MEMORANDUM OF COUNSEL ON BEHALF OF FULTON HOGAN LIMITED IN
RESPONSE TO QUERY REGARDING EXPERT WITNESS EVIDENCE
SUMMARIES**

DATED: 2 October 2019

MAY IT PLEASE THE COMMISSIONERS

1. The purpose of this Memorandum is to respond to a telephone query from the Hearings Administrator in relation to the provision of summaries of expert evidence. This was raised on Tuesday 1 October 2019.
2. I had read paragraphs [20] and [23] of the Commissioners' Minute 1 as a direction for expert witnesses presenting evidence to provide and read out summary statements at the commencement of the hearing. It appears, from the Hearings Administrator's query, that I have misunderstood the directions.
3. I will of course ask the experts to prepare a 2-page summary of their evidence in chief in accordance with para [20] if that assists. It may however be more helpful to the Commissioners if the experts each prepare a full written summary. This would address the expert's evidence in chief, any rebuttal evidence and, where appropriate, any joint witness statements.
4. This would ensure that the Commissioners have a concise summary of all the expert's evidence read at the hearing and captured in one document. If the Commissioners considered it appropriate, such a summary could be lodged pre-hearing, potentially at or about the same time as the requested legal submissions from the applicant.
5. This Memorandum may be treated as both an explanation in response to the Hearings Administrator's query and as a "deviation request". I have suggested the alternative approach as an efficient way of capturing and presenting a meaningful summary of each expert's evidence.

Dated 2 October 2019



D Caldwell

Counsel for the Applicant