



4 October 2019

Alison Cooper
Hearing Administrator
Environment Canterbury
P O Box 345
Christchurch

2A, Jacobsen Lane, Ngaio
Wellington 6035
New Zealand
+64 4 4795034

Reference: TPL080

Dear Alison

APPLICATION BY FULTON HOGAN LTD: DECLARATION OF PAST BUSINESS RELATIONSHIP.

The purpose of this letter is to declare a previous business relationship with an expert witness appearing for the applicant.

I, Paul Thomas, am one of the three Commissioners appointed jointly by Environment Canterbury and Selwyn District Council to hear and decide the resource consent application by Fulton Hogan Ltd for a new quarry, called Roydon Quarry, near Templeton.

The applicant has now filed its expert evidence and it includes a statement of evidence by Mr John Kyle. Mr Kyle states at paragraph 2 that he is the managing Director of Mitchell Daysh Limited which is a planning and environmental consultancy. At paragraph 7 it states that Mr Kyle was not involved in the preparation of the applications for Roydon Quarry.

Mitchell Daysh Ltd was formed in 2016 from a merger of two companies Environmental Management Services and Mitchell Partnerships. At that time, I was a contractor to Environmental Management Services Ltd. That contract was for a period of two years and transitioned to Mitchell Daysh Ltd terminating in July 2018.

I was not at any time a shareholder in Mitchell Daysh nor did I have any staff responsibilities. Mr Kyle is based in Dunedin and I was located in Wellington.

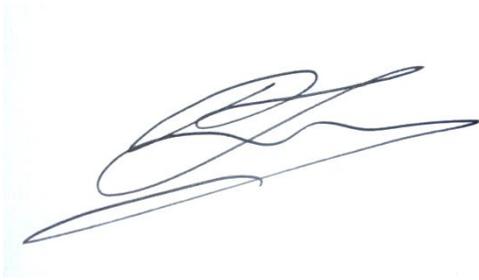
At no time has Mr Kyle discussed any aspect of the Roydon Quarry application with me, indeed I was not even aware he has engaged by Fulton Hogan until receiving his evidence from the Hearings Administrator.

This history is declared so that all parties are aware of the circumstances and to allay any concerns regarding any conflict of interest or perception of bias.

Please add this letter to the hearing web site.



Yours sincerely,

A handwritten signature in black ink, appearing to be 'Paul Thomas', written on a light blue background.

Paul Thomas
Thomas Planning Ltd
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