

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

AND

IN THE MATTER of a proposed review of the Kapiti Coast District
Plan: Chapter 2 Objectives

BETWEEN **MAYPOLE ENVIRONMENTAL LIMITED**

Submitter [No. 263]

AND **KAPITI COAST DISTRICT COUNCIL**

Local Authority

**MEMORANDUM OF COUNSEL FOR
MAYPOLE ENVIRONMENTAL LIMITED**

1 April 2016

MAY IT PLEASE THE PANEL -

1. I act for Maypole Environmental Limited (**Maypole**).
2. Maypole is a submitter to the Proposed Kapiti Coast District Plan (**PDP**) [No. 263].
3. The purpose of this memorandum is to seek leave for the late service of Mr. Chris Hansen's chapter 2 planning evidence filed today.
4. I confirm that Mr. Hansen completed his evidence on 29 March 2016. However, as discussed in my memorandum dated 22 March 2016, I was recently hospitalised after an accident that left me with multiple jaw fractures.
5. I was able to resume some light duties during the week commencing 18 March 2016. However, most of this week (commencing 29 March) was occupied with further hospital treatment and emergency dental surgery.
6. I consider that I am now sufficiently recovered that my injury will not again interfere with timetabling matters, including Maypole's first hearing set down between 11.45am to 12.45pm on 8 April 2016.
7. I would, once again, be extremely grateful if the commissioner could confirm that they are content to receive Mr. Hansen's evidence a few days out of time in light of the above circumstances.

Dated this 1 day of April 2016



R A Makgill
Counsel for Maypole Environmental
Limited