

**IN THE ENVIRONMENT COURT  
CHRISTCHURCH REGISTRY**

**ENV-2011-CHC-090**

In the matter of the Resource Management Act 1991

Between **MERIDIAN ENERGY LIMITED**

Applicant

And **HURUNUI DISTRICT COUNCIL and  
CANTERBURY REGIONAL COUNCIL**

Consent Authorities

---

**MEMORANDUM OF COUNSEL FOR HURUNUI DISTRICT COUNCIL TO  
ACCOMPANY FILING ORIGINAL SUBMISSIONS**

---

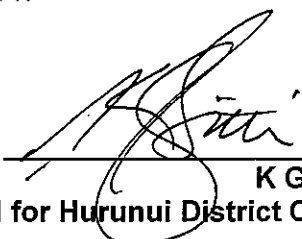
**BUDDLE FINDLAY**  
Barristers and Solicitors  
Christchurch

Solicitor Acting: K G Smith  
Email: [susan.newell@buddlefindlay.com](mailto:susan.newell@buddlefindlay.com)  
Tel 64-3-379 1747 Fax 64-3-379 5659 PO Box 322 DX WP20307 Christchurch 8140

**MAY IT PLEASE THE COURT:**

1. This memorandum accompanies the filing of original submissions to the application by Meridian Energy Limited lodged with Hurunui District Council.
2. Previously the Council has filed copies of these submissions which it did by sending them to Environment Canterbury which Council then lodged copies of all submissions.
3. There are three folders of original submissions accompanying this memorandum. Folders 1 and 2 are labelled "Hurunui Wind Project, RC110011 - Submissions A-K" and "Hurunui Wind Project, RC110011 – Submission L-Z " respectively.
4. The third volume contains three versions of the submission by Mr John Carr on behalf of Tipapa Limited. In that volume, the submission under tab 1 is the one filed prior to the closing date of submissions (although now incomplete as set out below).
5. The submission under tab 2 is the Council's copy of the complete submission made by Mr Carr under tab 1 reconstituted from its scanning system.
6. The version under tab 3 is a replacement submission supplied by Mr Carr to the Council after the date on which the submissions closed. The version of the submission under tab 3 contains material changes from the original submission under tab 1.
7. The Council considers that the submission under tab 1 is the valid submission by Mr Carr on behalf of Tipapa Ltd.
8. My instructions are that the reason the original submission (tab 1) is incomplete is the result of a printing instruction error when the submission was bound as a pdf document. The Council provided Mr Carr with an opportunity to re-order the submission and he was allowed to remove parts of the submission for that purpose. Mr Carr has not returned to the Council those parts of the original submission which he removed but instead has filed the version under tab 3.

DATED at Christchurch this 2<sup>nd</sup> day of December 2011.

  
K G Smith  
Counsel for Hurunui District Council