

Environment court
Christchurch

Tipapa Limited
Greta Valley
16 March 2012

Meridian Energy. Hurunui wind. ENV-2011-CHC-90

I hereby submit my list of witnesses.

A. Expert Witnesses.

1. Noise. Dr Robert Thorne
2. Health. Dr Daniel Shepherd
3. Traffic and Roothing. Mr Murray Messervy + . A.N. Other (see note 5 below)
4. Landscape. Anne Steven
5. Real Estate Valuer. Mr David Manning
6. Tipapa Estate. John Carr
7. Recreation and Tourism. Mr Scott Pearson

B. Calling as witness summons.

1. Mr Tim Lusk. Chief Executive of Meridian Energy until late 2011.
2. Mr Ken Smales. General Manager . Meridian Energy.
3. Shiela Watson. Natural Resources Manager. Meridian Energy
4. Alison Van Pollen. Consents Manager Hurunui Wind. Meridian Energy.
5. Mr Jock Foster. Chairman Greta Valley School Board of Trustees.
6. Mr Simon Batchelor. Lead turbine hosting landowner. Greta valley.
7. Mr Kerry Smith. Lawyer for Hurunui District Council. Buddle Findlay.
8. Councillor Russell Black. Hurunui District Council
9. Sue Stevenson. Hosting landowner. Omihi
10. Mr Peter Inkson. Hosting landowner. Omihi
11. Mr Hugh Turnbull. Hosting landowner. Omihi.

12. Judith Batchelor. Manager Environmental Services. Hurunui District Council

13. Mr David Edge. Manager Roads and Utilities. Hurunui District Council

14. Mayor Winton Dalley. Mayor Hurunui District Council

15. Mr Andrew Dalziel. Chief Executive. Hurunui District council.

NOTE.

1. It is possible that as preparations for the Court case proceed, prior to the case commencing its hearing in the Environment Court, that some of the above witnesses may not be required, at which point I will advise the Court accordingly.

2. I will wish to cross question most, and possibly all the witnesses called, as set out in Meridian Energy's Memorandum listing all witnesses for Meridian Energy, Canterbury Regional Council, and Hurunui District Council dated 27 January 2012.

3. I would wish to add to the above list prior to the Court hearing a legal expert to represent me on some specified issues should I find how to pay for a legal Counsel. I do not have the money to do so. Should I succeed in finding a way to pay a lawyer I will advise the Court of the name of my legal representative prior to the Environment Court hearing.

4. On 15 September 2010 at the offices of Meridian Energy, Christchurch, in the presence of Mr Tim Lusk, then Chief Executive of Meridian, Mr Ken Smales verbally and unconditionally undertook, on behalf of Meridian, to pay the costs of my employing a landscape expert to carry out a landscape assessment of Hurunui Wind's impact on Tipapa Estate. Mr Lusk at the time that the offer was made did not deny it, and has not since. Subsequently Mr Smales refused to honour his undertaking despite repeated requests by me. Mr Smales continues not to honour his word and the commitment that he made to me on behalf of Meridian Energy. I have therefore appointed the expert named above. I expect Meridian to pay this expert's costs as they relate to Tipapa estate.

5. At the 24 February Court directed meeting between Tipapa Estate and Meridian the matter of traffic and roading was discussed in relation to Meridian's proposed access route and alternatives. At that meeting Meridian undertook to provide to me the traffic and roading report that they had completed on Reeces Road, Omihi. I remain waiting to receive this report. Notwithstanding a reminder to Meridian via their lawyer I have yet to receive it. Until I view this report I will not know the extent to which I require a second expert to present to the Court on traffic and roading. It will only be following receipt of this report that I will be able to advise the Court as to whether I intend to call a further expert in this category, and if so the name of the expert. My inability to provide a second name, if required, in this submission is due exclusively to Meridian failing to date to provide to me the information they undertook to do three weeks ago.

Submitted by John Carr on behalf of Tipapa Limited.