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From: Tipapa Events [<mailto:tipapaevents@tipapa.com>]

Sent: 18 February 2012 10:35

To: S & B Barnes; A Baxter & N Stanley; Andrew Beatson; N & B Burgham; M & K Fitzsimmons; A Goodship; Chris Herbert; G & J Higginson; Lisa Kissell; L Love; A Marr; T McBreen; J & J McKone; H & K McLachlan; J McLachlan; G & M McLean; David Meares; Belinda Meares; Lyn Meares; V Meares; Ellie Messervy; M Messervy; Eric - NZ Wind Energy Assn; Kerry Smith; Gary Thomas; H & Y Turnbull; Phoebe Vincent

Subject: Hurunui Wind.Meridian Energy

Dear Lauren

I acknowledge receipt of Judge Borthwick's Memorandum extending the date of witness submission to 16 March.

Notwithstanding I have decided to formally submit my witness list now, which includes notes, in view of the fact that on 24 February I have a conferencing meeting with Meridian chaired by Commissioner Manning, and a private meeting beforehand with him. I therefore hope that some of the matters covered in my notes will be resolved at those meetings.

I will have my witness list updated and submitted by 16 March.

I will send this email and attachment to all parties.

Please acknowledge receipt of this email. Thank you.

Regards

John Carr

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Environment court

Christchurch

Tipapa Limited

Greta Valley

16 February 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. To be advised. See note 5 below.
- 4.Landscape. To be advised. See note 4 below.
- 5.Real Estate Valuer. Mr David Manning
6. John Carr. Tipapa Estate.
7. Legal. See note 3 below.

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.

NOTE.

1.It is possible that as preparations for the Court case proceed, prior to the case commencing it's hearing in the Environment Court, that some of the above witnesses will 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.

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. I remain waiting for Mr Smales to honour his word and the commitment that he made to me on behalf of Meridian Energy, and therefore to enable me to appoint a landscape expert in time to submit expert evidence by 27 April 2012. I await Meridian Energy's response as to whether they will honour the undertaking given to me.

5. My appointment of a traffic expert is dependent upon clarification that I receive from the Court regarding the Court's jurisdiction to assess and adjudicate on the alternative access route off SH1 that has been proposed.

Submitted by John Carr on behalf of Tipapa Limited.