

**BEFORE THE HEARINGS PANEL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of the Napier City Council's Proposed District Plan 2023

**AND**

**IN THE MATTER** of submissions by the Port of Napier Limited

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**MEMORANDUM OF COUNSEL FOR PORT OF NAPIER LIMITED**

**(HEARING STREAM 2)**

**Dated 26 November 2024**

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**MAY IT PLEASE THE HEARINGS PANEL:**

**Introduction**

1. This memorandum is filed on behalf of Port of Napier Limited I Te Herenga Waka o Ahuriri (**PONL**), a submitter on various provisions in the Napier City Council's Proposed District Plan 2023 (**PDP**). Napier Port Holdings owns PONL and PONL operates Napier Port situated at Breakwater Road, Napier.
2. The purpose of this memorandum is to set out PONL's approach to the topics to be considered at Hearing Stream 2. Reference is made to PONL's memorandum dated 22 October 2024.

**Hearing Stream 2**

3. PONL's expert planning consultant, Mr Grant Russell of Stantec, has reviewed the s42A Report and its recommendations for the Hearing Stream 2 topics and notes that the reporting officers have recommended that PONL's submissions be accepted or accepted in part.
4. PONL agrees with those recommendations and the amendments proposed to the relevant provisions. While PONL understands that these are merely recommendations and that the Panel may or may not accept them, the company is content not to call any further evidence or appear in relation to these submission points.

**Dated** this 26th day of November 2024



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K R M Littlejohn  
Counsel for Port of Napier Limited