

In the High Court of New Zealand  
Wellington Registry  
I Te Kōti Matua o Aotearoa  
Te Whanganui-ā-Tara Rohe

CIV 2021-485-735

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*under:* the Judicial Review Procedure Act 2016

*in the matter of:* an application for judicial review of decisions under  
sections 19A and 19B of the Land Transport  
Management Act 2003

*between:* **Movement**  
*Applicant*

*and:* **New Zealand Transport Agency**  
*Respondent*

Memorandum of counsel for Waka Kotahi NZ Transport Agency

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Dated: 15 February 2022

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Reference: T D Smith (tim.smith@chapmantripp.com)  
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**MEMORANDUM OF COUNSEL FOR WAKA KOTAHI**

May it please the Court:

- 1 The Court's Minute of 3 February 2022 required Waka Kotahi to:
  - 1.1 provide a copy of the statement of claim, the statement of defence, the joint memorandum of counsel dated 3 February 2022 and the Minute itself to the approved organisations, the Ministry of Transport, and the Attorney-General, by 14 February 2022; and
  - 1.2 file a memorandum with the Court setting out which organisations have been provided with those documents by 15 February 2022.
- 2 Waka Kotahi has provided the documents referred to above to the approved organisations listed in **Schedule One**. The documents have also been provided to the Ministry of Transport and the Attorney-General.
- 3 There has been a slight delay in providing the documents to three approved organisations: the Department of Conservation, the Waitangi National Trust Board and Kāinga Ora – Homes and Communities. Those approved organisations will be provided with the documents tomorrow.

Dated: 15 February 2022



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Victoria Heine QC / Tim Smith / Anthony Wicks  
Counsel for Waka Kotahi

## SCHEDULE ONE

<b>Approved organisations provided with the documents referred to at paragraph 1.1, above.</b>
Ashburton District Council
Auckland Council
Auckland Transport (AT)
Bay of Plenty Regional Council
Buller District Council
Carterton District Council
Central Hawke's Bay District Council
Central Otago District Council
Chatham Islands Council
Christchurch City Council
Clutha District Council
Dunedin City Council
Environment Canterbury
Environment Southland
Far North District Council
Gisborne District Council
Gore District Council
Greater Wellington Regional Council
Grey District Council
Hamilton City Council
Hastings District Council
Hauraki District Council
Hawke's Bay Regional Council
Horizons Regional Council
Horowhenua District Council
Hurunui District Council
Hutt City Council
Invercargill City Council
Kaikoura District Council
Kaipara District Council
Kāpiti Coast District Council
Kawerau District Council
MacKenzie District Council
Manawatū District Council
Marlborough District Council

Masterton District Council
Matamata-Piako District Council
Napier City Council
Nelson City Council
New Plymouth District Council
Northland Regional Council
Ōpōtiki District Council
Otago Regional Council
Otorohanga District Council
Palmerston North City Council
Porirua City Council
Queenstown Lakes District Council
Rangitikei District Council
Rotorua Lakes Council
Ruapehu District Council
Selwyn District Council
South Taranaki District Council
South Waikato District Council
South Wairarapa District Council
Southland District Council
Stratford District Council
Taranaki Regional Council
Tararua District Council
Tasman District Council
Taupo District Council
Tauranga City Council
Thames Coromandel District Council
Timaru District Council
Upper Hutt City Council
Waikato District Council
Waikato Regional Council
Waimakariri District Council
Waimate District Council
Waipa District Council
Wairoa District Council
Waitaki District Council
Waitomo District Council
Wellington City Council

West Coast Regional Council
Western Bay of Plenty District Council
Westland District Council
Whakatane District Council
Whanganui District Council
Whangārei District Council