

Our File: 242520
April 8, 2024

Michelle Walsh-Doucette
Commission Clerk
Prince Edward Island Regulatory & Appeals Commission
5th Floor, Suite 501,
National Bank Tower
134 Kent Street
Charlottetown, PE

Dear Ms. Walsh-Doucette:

RE: LA22002 – Parry Aftab and Allan McCullough v Minister of Agriculture and Land

Please find the enclosed Witness List and 'Will-Say' Statements prepared on behalf of the Appellants, Parry Aftab and Allan McCullough.

The Appellants reserve the right to call additional witnesses as may be required in advance of the hearing.

I trust the foregoing to be satisfactory, but if you have any questions, please do not hesitate to contact me.

Yours very truly,



Tom Keeler
Enclosures (2)

Cc:

Christiana Tweedy
Legal Services
Justice and Public Safety
95 Rochford Street, PO Box 2000
Charlottetown, PE
Counsel for the Respondent

THE ISLAND REGULATORY AND APPEALS COMMISSION

IN THE MATTER OF an appeal pursuant to section 28 of the *Planning Act*, RSPEI 1988, P8 by Parry Aftab and Allan McCullough with respect to the denial of an application for an Amended Development Permit at PID#877647 located at Bessie Willow Land, Point Prim, Queens County, Prince Edward Island

WITNESS LIST

Name	Contact Info
Parry Persia Aftab	185 Hillcrest Avenue Wyckoff, NJ 07481 United States Tel: 201 673 4455 Email: parry@aftab.com
Carl Allan McCullough	185 Hillcrest Avenue Wyckoff, NJ 07481 United States Tel: 201 673 4455
Chris Markides, MCIP, LPP	ZZap Consulting Inc. 1 Canal Street Dartmouth, NS B2Y 2W1 Tel: 902 464 9927 Email: chris@zzap.ca

THE ISLAND REGULATORY AND APPEALS COMMISSION

IN THE MATTER OF an appeal pursuant to section 28 of the *Planning Act*, RSPEI 1988, P8 by Parry Aftab and Allan McCullough with respect to the denial of an application for an Amended Development Permit at PID#877647 located at Bessie Willow Land, Point Prim, Queens County, Prince Edward Island

WILL SAY STATEMENTS

Parry Persia Aftab will appear at the hearing of this matter and will provide evidence regarding:

- Her personal knowledge respecting the history of this matter including the events leading up to the filing of the Amended Building and Development Permit Application filed by the Appellant, on July 27, 2021, (M-2021-0200) for a single-unit summer cottage dwelling located at PID #877647, Bessie Willow Lane, Point Prim, Queens County, Prince Edward Island (the “Subject Property”).

Carl Allan McCullough will appear at the hearing of this matter and will provide evidence regarding:

- His personal knowledge respecting the history of this matter including the events leading up to the filing of the Amended Building and Development Permit Application filed by the Appellant, on July 27, 2021, (M-2021-0200) for a single-unit summer cottage dwelling located at PID #877647, Bessie Willow Lane, Point Prim, Queens County, Prince Edward Island (the “Subject Property”).

Chris Markides, Member of the Canadian Institute of Planners, Licensed Professional Planner of Nova Scotia, will appear at the hearing of this matter and will provide expert evidence regarding:

- His expert opinion (further to the Appellant’s Point Prim Appeal Expert Opinion Report, dated March 18, 2024) including review and analysis of the decision made by the Minister of Agriculture and Land dated December 14, 2021, (the “Decision”) to refuse the Amended Building and Development Permit Application filed by the Appellant, on July 27, 2021, (M-2021-0200) for a single-unit summer cottage dwelling located at PID #877647, Bessie Willow Lane, Point Prim, Queens County, Prince Edward Island (the “Subject Property”).