

**BEFORE A HEARING PANEL: FOR THE PROPOSED WAIKATO DISTRICT
PLAN**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of submissions and further submissions
on the Proposed Waikato District Plan

AND

IN THE MATTER of Hearing of Rezoning Requests
(excluding for the Ohinewai Area):
Hearing 25

**MEMORANDUM OF COUNSEL FOR MEREMERE DRAGWAY
WITHDRAWING SUBMISSION POINT**

27 January 2021

**BROOKFIELDS
LAWYERS**

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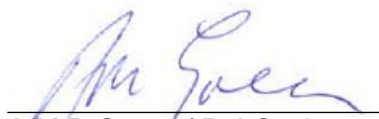
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MAY IT PLEASE THE HEARINGS COMMISSIONERS

1. Meremere Dragway Incorporated (**Meremere Dragway**) made a submission on Stage 1 of the Proposed Waikato District Plan (**PDP**). Meremere Dragway sought, inter alia, that "Schedule 25E Meremere Dragway" from the Operative Waikato District Plan be reinstated into the Rural Chapter of the PDP as a fifth Special Area titled "22.9 Specific Area – Drag Way Park".
2. Meremere Dragway no longer wishes to pursue its submission point seeking to reinstate the scheduled activity approach used in the Operative Plan, nor does it wish to pursue a spot rezoning, an approach discussed by Jonathan Clease in his closing statement.¹ Thus, Meremere Dragway wishes to advise the Hearings Panel that it does not intend to appear at Hearing 25 or to file evidence in support of its submission.
3. Meremere Dragway now considers the Rural Zone provisions (amended in accordance with the relief sought by Meremere Dragway) best provide for the long-established activities at Meremere Dragway, rather than the reinstatement of a scheduled area or specific spot rezoning.
4. For the avoidance of doubt, Meremere Dragway continues to seek the relief sought in its legal submissions presented at Hearing 18 Rural Zone,² addressing the definition of "Meremere Dragway Activity" and Policy 5.3.12.


A M B Green / B J Cochrane

Counsel for Meremere Dragway Incorporated

¹ Closing Statement, Hearing 18: Rural Zone – Land use, dated 23 October 2020, at paragraphs 47 – 50.

² Legal submissions on behalf of Meremere Dragway, prefiled on 24 September 2020.