

**BEFORE INDEPENDENT HEARING COMMISSIONERS
APPOINTED BY THE WAIKATO DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991
(**RMA**)

AND

IN THE MATTER of the Proposed Waikato District Plan

BETWEEN **OHINEWAI LANDS LIMITED**

Submitter [No. 428]

AND

WAIKATO DISTRICT COUNCIL

Local Authority

**MEMORANDUM OF COUNSEL FOR OHINEWAI LANDS LIMITED FOR
LEAVE TO FILE SUPPLEMENTARY EVIDENCE FOR HEARING 25 –
ZONE EXTENTS – REST OF DISTRICT**

Dated: 3 June 2021

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MAY IT PLEASE THE COMMISSIONERS:

1. Counsel acts for Ohinewai Lands Limited (**OLL**) on the Proposed Waikato District Plan (**pWDP**).
2. The purpose of this memorandum is to:
 - (a) Update the Panel on OLL's position following the release of the Panel's decision on Hearing 19 (Ohinewai Rezoning) dated 24 May 2021 (**the Decision**); and
 - (b) Seek leave to file supplementary Statement of Evidence of Matthew Twose on behalf of OLL (2 June 2021).
3. At para. 19 of the Decision, the Panel notes the *"initial intention was that this decision would address all of the submissions which addressed zoning at Ohinewai"*. However, on further consideration, the Panel resolved to incorporate decisions on the other submissions into the Hearing 25 decision. The submissions deferred for consideration within Hearing 25 include OLL's submission [428].
4. As outlined in a Memorandum of Counsel filed on 13 May 2021 for OLL:
 - (a) OLL is the owner of rural properties in the Ohinewai area and has consistently sought to have part of its land identified as a future growth area in the pWDP, to align with the recommendations in the Waikato 2070 growth strategy.
 - (b) OLL presented evidence and submissions at Hearing 19 in support of its submission seeking the identification of future growth areas to the north and south of APL's land, and for amendments to the Ohinewai Structure Plan.
 - (c) Subsequent to Hearing 19, OLL was given leave evidence in support of the application of a FUZ to part of its land. OLL's submission has been allocated to the "Rest of District" topic and is scheduled to be heard on 10 June 2021.

5. OLL has reviewed the relief being sought in light of the Decision, and considers that some changes are appropriate to better integrate the proposed FUZ with the decision version of the Ohinewai Structure Plan.
6. OLL respectfully seeks leave to file the supplementary statement of evidence prepared by Mr Twose to address:
 - (a) A change to its FUZ relief to reduce the extent of the FUZ for future industrial (the Southern Block); and
 - (b) Changes to the Ohinewai Structure Plan to integrate the southern (industrial) and northern (residential) FUZ.

DATED 3 June 2021



B.C. Parkinson

Counsel for Ohinewai Lands Limited