

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Waikato District Plan

MEMORANDUM OF COUNSEL ON BEHALF OF SHAND PROPERTIES LIMITED

Dated 21 May 2021

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MAY IT PLEASE THE HEARING PANEL:

1. This memorandum is filed on behalf of Shand Properties Limited (**Shand**). Shand made a submission dated 9 October 2018 (#778) and a further submission dated 27 May 2019 (#1141) in relation to the Zone Extents topic, which is being heard in Hearing 25.
2. Shand's submissions seek to rezone parts of its land located in the northern part of Huntly. The submissions seeking rezoning in Huntly are being heard on 6 July 2021.
3. On 17 February 2021, Shand filed evidence in support of its submissions, including a statement of evidence from Mr Philip Pirie, a Licenced Cadastral Surveyor and Land Development Engineer. Mr Pirie's evidence addresses water supply and wastewater matters arising from Shand's submissions.
4. Mr Pirie has since moved overseas and will be unavailable to appear at the hearing.
5. Mr Jean-Pierre Velloen, a Senior Land Development Engineer from Bloxom Burnett & Olliver, has read Shand's submissions, undertaken a site inspection¹, and reviewed Mr Pirie's statement of evidence dated 17 February 2021. Mr Velloen has confirmed his full agreement with Mr Pirie's evidence and recommendations and adopts that evidence as his own.
6. Mr Velloen has a Bachelor of Civil Engineering from the University of Pretoria (2010). He is a registered member of the NZ Chartered Professional Engineers (CPEng). He has over 10 years' experience in Design Management on subdivisions ranging from 100 to 3500 lots.

¹ On 6 May 2021.

7. Mr Velloen has read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2014 and agrees to comply with it.

8. Mr Velloen will be available at the hearing on 6 July 2021 to answer any questions that the Hearing Panel has concerning water supply and wastewater matters relating to Shand's submissions.

Dated 21 May 2021



L F Muldowney / S K Thomas
Counsel for Shand Properties Limited