

Before an Independent Hearings Panel

The Proposed Waikato District Plan (Stage 1)

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

IN THE MATTER OF hearing submissions and further submissions on the Proposed
Waikato District Plan (Stage 1)

**MEMORANDUM OF COUNSEL REGARDING OPENING LEGAL SUBMISSIONS ON
BEHALF OF HAVELOCK VILLAGE LIMITED AND TATA VALLEY LIMITED**

26 September 2019

BUDDLEFINDLAY
NEW ZEALAND LAWYERS

Barristers and Solicitors
Auckland

Solicitor Acting: **Vanessa Evitt / Mathew Gribben**

Email: vanessa.evitt@buddlefindlay.com / mathew.gribben@buddlefindlay.com
Tel 64-9-358 2555 PO Box 1433 DX CP24024 Auckland 1140

MAY IT PLEASE THE COMMISSIONERS

- 1.1 On behalf of Havelock Village Limited¹ (**HVL**) and TaTa Valley Limited² (**TVL**) we would like to thank the Hearing Panel for the opportunity to present opening legal submissions on behalf HVL and TVL.
- 1.2 Having reflected further on the timing of opening hearing relative to the main rezoning hearings in the latter part of 2020 and the proposed notification of Stage 2 in early 2020, HVL and TVL now consider that it would be more efficient to present their legal submissions in person at the start of their substantive cases at the rezoning hearings. This will also allow TVL and HVL to consider any necessary amendments or updates to its proposals arising from the evidence of other submitters.
- 1.3 We have however prepared the attached opening legal submissions to provide the Panel with necessary background and context for HVL and TVL's submissions as well as an overview of key issues for consideration by the Panel. The submissions also provide context for the expert evidence that HVL and TVL intend to file in the upcoming hearings. TVL and HVL respectfully request that these submissions are tabled for consideration by the Panel on the papers.

DATED this 26th day of September 2019



V S Evitt / M G Gribben

Counsel for Havelock Village Limited and
TaTa Valley Limited

¹ Submitter 862.

² Submitter 574.