

IN THE MATTER of the Resource Management Act 1991 (**RMA**)
AND
IN THE MATTER of the Proposed Waikato District Plan
BETWEEN **RANGITAHİ LIMITED**
Submitter [No. 343]
AND **WAIKATO DISTRICT COUNCIL**
Local Authority

**MEMORANDUM OF COUNSEL FOR RANGITAHİ LIMITED CONCERNING
DEFINITIONS HEARING**

Dated: 6 December 2019

Solicitors on Record

BURTON PARTNERS
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MAY IT PLEASE THE COMMISSIONERS:

1. Counsel acts for Rangitahi Limited (**RL**), a submitter and further submitter on the proposed Waikato District Plan (**pWDP**) and owner of properties in the south and west of Raglan, including the Rangitahi Peninsula.
2. RL made submissions on Chapter 12 – Definitions, Chapter 9.3 – Rangitahi Peninsula Objectives and Policies and Chapter 28 – Rangitahi Peninsula Zone Rules. The hearing of submissions on the zone objectives, policies and rules has been assigned to Hearing 23 which is set down to commence on 15 October 2020.
3. This memorandum concerns Hearing 5 on Chapter 12 - Definitions, scheduled to be heard on 9 December 2019. Counsel has recently been instructed in this matter, and apologises to the Commissioners for the late filing of this memorandum.
4. Counsel seeks directions that the consideration of evidence and legal submissions on behalf of RL on the definitions for “Childcare Facility” and “Community Activity” be reassigned to Hearing 23. RL’s submissions on the Chapter 12 Definitions are made in the context of the Rangitahi Peninsula commercial activity and community activity definitions, and RL intends to produce evidence at Hearing 23 to address submission point 343.9.
5. Reassigning hearing point 343.9 to Hearing 23 will reduce the costs to parties and allow RL’s evidence on the definitions to be heard in the context of the Rangitahi Peninsula commercial activity and community activity definitions.
6. Counsel anticipates filing a further memorandum seeking directions once they have a better understanding of the scope of submissions and the relief sought.

DATED 6 December 2019



Dr R.A. Makgill / B.C. Parkinson
Counsel for Rangitahi Limited