

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

AND

IN THE MATTER of the Proposed Waikato District Plan

BETWEEN **NZTE OPERATIONS LIMITED**

Submitter [No. 823]

AND **WAIKATO DISTRICT COUNCIL**

Local Authority

**MEMORANDUM OF COUNSEL ON SUPPLEMENTARY EVIDENCE
HEARING 17 – TE KOWHAI AIRPARK ZONE**

Dated: 5 March 2021

Solicitors on Record

GREENWOOD ROCHE
SOLICITOR — *FRANCELLE LUPIS*

PO Box 106006, Auckland 1143
P 09 306 0495 F 04 494 8501 E francelle@greenwoodroche.com

Counsel

Dr R A MAKGILL
BARRISTER

PO Box 77-037, Mt Albert, Auckland 1350
P 09 815 6750 E robert@robertmakgill.com

MAY IT PLEASE THE COMMISSIONERS:

INTRODUCTION

1. Counsel acts for NZTE Operations Limited (**NZTE**) on the Proposed Waikato District Plan (**pWDP**). This memorandum seeks leave to file supplementary evidence for the Te Kowhai Airpark Zone hearing to be presented on Monday, 8 March 2021.
2. The supplementary evidence is as follows:
 - (a) Supplementary statements from Mr Readman and Ms Smith correcting an error in Appendix 13 of the s.32 report relating to historic aircraft movements, which has been reproduced in Humpheson's evidence on behalf of Waikato District Council.
 - (b) A supplementary statement from Mr Park producing a diagram of the Obstacle Limitation Surfaces (**OLS**) to accompany his summary statement, and to aid the Commissioner's understanding.
 - (c) A supplementary statement from Mr Serjeant producing a revised rules package in response to the s.42A rebuttal report.
3. NZTE respectfully seeks leave to file the supplementary evidence on the grounds that the information is provided to assist the Commissioners and in response to matters raised in the s. 42A rebuttal report.

Dated 5th day of March 2021



Dr R A Makgill / B C Parkinson
Counsel for NZTE Operations Limited