

UNDER the the Resource Mangement Act 1991 ("RMA")
IN THE MATTER of Proposed Waikato District Plan (Stage 1): Hearing 3 –
Strategic Objectives

**APPLICATION FOR WAIVER BY KĀINGA ORA-HOMES AND
COMMUNITIES (749, FS1269)**

15 October 2019

**ELLIS GOULD
LAWYERS
AUCKLAND**

**Level 17 Vero Centre
48 Shortland Street, Auckland
Tel: 09 307 2172 / Fax: 09 358 5215
PO Box 1509
DX CP22003**

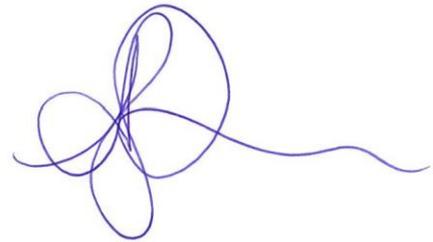
**REF: Dr Claire Kirman / Daniel AUCKLAND
Sadlier**

MAY IT PLEASE THE HEARINGS PANEL:

1. Kāinga Ora-Homes and Communities (“**Kāinga Ora**”) is a submitter and further submitter in respect of the Proposed Waikato District Plan, and relevantly in respect of matters to be considered in Hearing 3 – Strategic Objectives scheduled to commence on 4 November 2019 (“**Hearing 3**”).
2. Pursuant paragraph 24 of the Panel’s directions dated 21 May 2019 (“**Direction**”), the due date for lodging both expert and lay evidence in respect Hearing 3 is today, 15 October 2019.
3. Kāinga Ora has lodged its expert evidence in accordance with the Direction. As communicated to the Panel in previous hearing, Kāinga Ora had also intended to lodge a statement of corporate evidence on behalf of Kāinga Ora, setting out a high level overview of the organisation, particularly as it relates to its role as a public housing landlord. However, as a function of the transition from the previous entity (Housing New Zealand Corporation) to Kāinga Ora, it has not been possible to finalise this evidence for lodgement in accordance with the Direction.
4. Counsel has been co-ordinating with Kāinga Ora representatives in terms of the preparation of corporate evidence. The indication it has received is that it should be in a position to lodge the evidence on 23 October 2019. It accordingly seeks an extension of time provided for under the Panel’s direction to enable that to occur.
5. Kāinga Ora is conscious that its request may inconvenience the Panel, but says that neither the Council nor any submitters will be unduly prejudiced if the Panel grants an extension of time for the filing of Kāinga Ora’s corporate evidence, because:
 - (a) The proposed evidence will be non-contentious, and focused on providing context for Kāinga Ora as an organisation, and the manner in which it operates.
 - (b) Given the non-contentious nature of the corporate evidence which is specific to Kāinga Ora, it will not be amenable to “rebuttal” by Council experts.

- (c) Kāinga Ora has conferred with Ms Wratt for the Waikato District Council, who has confirmed that the Council will not oppose the application for extension of time sought.
6. For the reasons given above, counsel respectfully requests that the Panel grant Kāinga Ora an extension of time for lodging its statement of corporate evidence until 23 October 2019.

DATED this 15th day of October 2019

A handwritten signature in blue ink, consisting of several loops and a long horizontal tail extending to the right.

Dr Claire Kirman / Daniel Sadlier / Alex Devine
Counsel for Kāinga Ora-Homes and Communities