

**BEFORE AN INDEPENDENT HEARINGS PANEL  
OF THE WAIKATO DISTRICT COUNCIL**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of the proposed Waikato  
District Plan (Stage 1)  
Hearing 25

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**MEMORANDUM OF COUNSEL ON BEHALF OF HYNDS PIPE SYSTEMS LIMITED  
AND THE HYNDS FOUNDATION**

**DATED: 5 MARCH 2021**

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**Simpson Grierson**  
Barristers & Solicitors

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## **MAY IT PLEASE THE COMMISSIONERS:**

### **INTRODUCTION**

1. We act for Hynds Pipe Systems Limited and the Hynds Foundation (together, **Hynds**).
2. Hynds is currently preparing evidence in opposition to other submitters' rezoning requests that, in accordance with the memorandum filed by the Council dated 5 November 2020 as circulated by the Council's hearings manager on 5 November 2020, is due at 5pm on 10 March 2021. Hynds respectfully requests a five working day extension until 5pm on 17 March 2021 to the deadline for its evidence opposing other submitters' rezoning requests.

### **REASONS FOR HYND'S REQUEST FOR AN EXTENSION**

3. Hynds makes this request on the basis that:
  - (a) Auckland's return to Alert Level 3 is making it more difficult for Hynds' consultants to prepare their evidence. In particular, a number of Hynds' Auckland-based expert consultants wish to carry out site visits to Pokeno so that they are able to fully respond to issues raised in other submitters' evidence (including amendments that have been made to the submitters' rezoning proposals that are set out in that evidence). This is not possible while Auckland is still at level 3; and
  - (b) A number of the submitters making rezoning requests were given extensions for the filing of their evidence in support of their rezoning requests. In particular, Havelock Village Limited's evidence in support of its rezoning request was filed 2 working days later than Hynds had anticipated. Given the tight deadline for preparing evidence responding to that evidence (fifteen working days), and the volume of evidence prepared in support of the various rezoning requests that Hynds opposed in its submission/further submissions, Hynds now respectfully requests an extension so that its expert consultants have the time to properly consider and respond to that evidence.

4. The five working day evidence deadline extension we seek will assist in ensuring that Hynds can prepare succinct and well-considered evidence to present to the Commissioners.

**DATED** at Auckland this 5<sup>th</sup> day of March 2021



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Bill Loutit / Sarah Mitchell  
Counsel for Hynds Pipe Systems Limited  
and the Hynds Foundation