

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
APPOINTED BY THE WAIKATO DISTRICT COUNCIL**

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

**AND**

**IN THE MATTER** of the Proposed Waikato District Plan

**BETWEEN** **OHINEWAI LANDS LIMITED**

Further Submitter [No. 3022]

**AND** **WAIKATO DISTRICT COUNCIL**

Local Authority

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**MEMORANDUM OF COUNSEL FOR OHINEWAI LANDS LIMITED  
SEEKING LEAVE TO PRESENT ON HEARING 27B SUBMISSION  
POINTS AT HEARING 27C**

Dated: 16 April 2021

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Solicitors on Record

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**MAY IT PLEASE THE COMMISSIONERS:**

1. Counsel acts for Ohinewai Lands Limited (**OLL**) on the Proposed Waikato District Plan (**pWDP**).
2. This memorandum accompanies the Statement of Evidence-in-reply of Matthew Twose (planning) in relation to the Flood Hazard Overlay objectives, policies and mapping.
3. The evidence addresses changes requested to the mapping of the Flood Hazard Overlay, and requested changes to the objectives and policies in Chapter 15. The later includes three submission points relating to: Hearing 27B – Objectives, Policies and General Submissions.
4. OLL has confirmed that it wishes to be heard in support of its further submission (FS3022) at Hearing 27C – Flood Hazards.
5. OLL respectfully seeks leave to address the three submission points relating to Hearing 27B – Objectives, Policies and General Submissions in its presentation at Hearing 27C.

**DATED** 16 April 2021



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**Dr R.A. Makgill / B.C. Parkinson**

**Counsel for Ohinewai Lands Limited**