

**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

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**MEMORANDUM OF COUNSEL ON SCHEDULING OF SUBMITTERS  
HEARING 25 - RAGLAN**

**Dated: 26 February 2021**

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Solicitors on Record

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**MAY IT PLEASE THE COMMISSIONERS:**

1. Counsel acts for Rangitahi Limited on the Proposed Waikato District Plan (pWDP). This memorandum responds to the request from the Hearing Administrator (dated 2 February 2021) for information to assist with the scheduling of submitters.
2. Rangitahi made submissions (number 343) and further submissions on the pWDP. Evidence in chief has been filed for the Zone Extents Topic in support of Rangitahi's submission seeking provision for future growth in Raglan. Rangitahi wishes to be heard in support of this submission.
3. The six expert witnesses, landowner/submitter and legal counsel will appear in support of Rangitahi's submission. Those witnesses will prepare a "highlights" package, and three of the witnesses have prepared a PowerPoint presentation to accompany their evidence. To assist with scheduling counsel estimates that 3 hours will be required to present evidence and legal submissions as follows:
  - (a) 20 minutes each for the presentations by Dr Fairgray (Economics), Ms de Lambert (Landscape Architecture) and Mr Lunday (Urban Design);
  - (b) 15 minutes each for the presentations by Mr O'Callaghan (Infrastructure), Mr Clark (Traffic) and Mr Peacocke (Landowner);
  - (c) 30 minutes for the presentation by Mr Inger (Planning); and
  - (d) 45 minutes for opening and closing legal submissions.
4. With reference to the Hearing Panel's directions of 21 May 2019 counsel respectfully seeks leave to extend the allocated hearing time for Rangitahi's submission as set out in paragraph 3 above.

**DATED** 26 February 2021



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