

IN THE MATTER of the Resource Management Act 1991 (**RMA**)
AND
IN THE MATTER of the Proposed Waikato District Plan
BETWEEN **RANGITAHU LIMITED**
Submitter [No. 343]
AND **WAIKATO DISTRICT COUNCIL**
Local Authority

**MEMORANDUM OF COUNSEL REGARDING LEAVE TO FILE LATE
EVIDENCE
HEARING 25 - RAGLAN**

Dated: 15 March 2021

Solicitors on Record

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MAY IT PLEASE THE COMMISSIONERS:

1. Counsel acts for Rangitahi Limited (**Rangitahi**) on the Proposed Waikato District Plan (**pWDP**).
2. This memorandum accompanies the Statement of Evidence of Angeline Ngahina Greensill on behalf of Tainui Hapū in support of the submission by Rangitahi for a Raglan-wide structure plan for Whāingaroa/Raglan.
3. Rangitahi's submission on the Zone Extents Topic has sought placed-based planning for growth with provision for a Council-led, Raglan-wide spatial plan followed by site specific structure planning to achieve live zoning.
4. Tainui Hapū has been closely involved as an important partner for the planning of urban growth on the Rangitahi Peninsula. Rangitahi's director (David Peacocke) and consultant planner (Ben Inger) met with Ms Greensill in October 2020 to discuss Rangitahi's submission.¹ The purpose of that meeting was to advise Tainui Hapū of Rangitahi's submission on the PWDP and to seek to understand Tainui Hapū's views on Raglan's future growth.
5. It was originally intended to file Ms Greensill's evidence together with Rangitahi's evidence in chief (**EIC**), and her statement is dated 17 February 2021 reflecting that intent.
6. However, a couple of factor's have delayed the completion of Ms Greensill's evidence:
 - (a) First, the Council's s42A Report dated 26 January 2021 introduced a recommendation for a Future Urban Zone (**FUZ**) to be included in the PWDP. Rangitahi advised Ms Greensill in early February that it would be seeking a FUZ over an area to the south of the Rangitahi Structure Plan area.
 - (b) Secondly, it was necessary to allow an opportunity for hapū members input to the proposed spatial plan for Whāingaroa/Raglan, and the recommendation for a FUZ.² Ms Greensill sought that input at the Poihakena Marae monthly Hui in February.

¹ Ben Inger's EIC, at [45].

² Angeline Greensill's EIC, at [23].

7. Rangitahi respectfully seeks leave to file Ms Greensill's evidence late as part of its EIC in support of its submission seeking a Raglan-wide spatial plan.

DATED 15 March 2021

A handwritten signature in blue ink, appearing to read 'B.C. Parkinson', written in a cursive style.

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