

From: [Kate Barry-Piceno](#)
To: [DistrictPlan](#)
Subject: Commissioner Directions 5 March 2021 re Fullers Memo on Framework Report
Date: Tuesday, 9 March 2021 5:32:25 pm

On behalf of my Clients Perrys Group(Submitter 464)) and Hounsell Holdings Limited (submitter 832), I confirm that we have read the memorandum from Mr Peter Fuller, legal counsel for Pokeno West Limited, CSL Trust and Top End Properties, all of whom are submitters on the proposed Waikato District Plan (“proposed plan”). Both my clients support his position setting out legal issues with the Framework Report potential fettering of legal scope of the Section 42A report, for the same reasons he has outlined thoroughly.

I do not consider it necessary to file any further memorandum but advise the Commissioners that Perrys and Hounsell’s Holdings support the concerns as outlined in Mr. Fuller’s memorandum. We would like to be included in any telephone or zoom conference about the matter on 12 April 2021.

Kind regards,

Kate Barry-Piceno
Barrister

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