

**BEFORE INDEPENDENT HEARING COMMISSIONERS
APPOINTED BY THAMES COROMANDEL DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions to Variation 3 to the
Proposed Thames Coromandel District Plan
(Taiwawe Catchment Structure Plan)

**MEMORANDUM OF COUNSEL FOR
HOT WATER BEACH (NZ) LIMITED SEEKING DIRECTIONS**

Dated 31 March 2021

MAY IT PLEASE THE COMMISSIONERS

1. Filed herewith are supplementary statements of evidence for Hot Water Beach (NZ) Limited, namely:
 - (a) Phillip Green (updated, with amended Diagrams C to F to show nominal swales)
 - (b) John Burgess – Traffic
 - (c) Michael Chapman – Stormwater
 - (d) Nicholas Goldwater – Ecology
 - (e) Stephen Brown – Landscape
 - (f) Graeme Lawrence – Planning (along with Structure Plan Version 12, as amended in response to submitter evidence and supplementary s42A report) .
2. Further to the directions of the Hearing Commissioners in the minutes dated 18 and 22 March 2021, Hot Water Beach (NZ) Limited seeks a direction from the Commissioners that expert conferencing take place between Mr Varley and Mr Burgess to discuss the apparent “considerable concerns” raised on page 2 of Mr Varley’s comments (included as Attachment 1 to the Supplementary s 42A Report), and subject of paragraph 19 of Mr Burgess’ supplementary evidence.
3. As explained by Mr Burgess, attempts have been made to initiate discussions informally, but those attempts have not been successful.
4. It is respectfully submitted that expert conferencing on this topic would be of benefit to the process, in terms of narrowing or resolving issues that would otherwise need to be determined at the resumed hearing.
5. That conferencing could take place either before, as part of, or subsequent to the pre-hearing meeting (at the Commissioners preference, in the event they are minded to make the requested direction).



Martin Williams
Counsel for Hot Water Beach (NZ) Limited

Dated: 31 March 2021