

**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)

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**MEMORANDUM OF COUNSEL FOR  
HOT WATER BEACH (NZ) LIMITED REGARDING EVIDENCE**

**Dated 1 March 2021**

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## **MAY IT PLEASE THE COMMISSIONERS**

1. Filed herewith are the statements of evidence for Hot Water Beach (NZ) Limited, namely from:
  - (a) Philip Green (survey areas)
  - (b) Stephen Brown (landscape)
  - (c) Nicholas Goldwater (ecology)
  - (d) John Burgess (traffic)
  - (e) Philip Kelsey (engineering)
  - (f) Michael Chapman (stormwater)
  
2. Also filed herewith are the Structure Plan rules and Diagrams referred to in this evidence, and a link to the Attachments referred to in Mr Brown's evidence.
  
3. Attachments 1-3 as referred to in the Structure Plan are as accessed through this link.
  
4. Mr Lawrence is completing his draft evidence (planning). Unfortunately Mr Lawrence was the victim of a computer Phishing attack at approximately midday last Friday, and was only able to retain access to his computer, files and databases on Saturday afternoon (27 February).
  
5. Hot Water Beach (NZ) Limited seeks an extension to the deadline to file Mr Lawrence evidence, to 2pm 2 March accordingly.
  
6. It is respectfully submitted that this extension would not cause any prejudice to other parties. The Structure Plan as attached (Version 11) and supporting expert opinion, being the form of Structure Plan Hot Water Beach (NZ) Limited submits should be approved, is all available (herewith) within the time directed.
  
7. Mr Lawrence's evidence would be given by way of planning evaluation of the same, rather than revealing its content. An equivalent extension to any other expert giving planning evidence would not be opposed by Hot Water Beach (NZ) Limited.

A handwritten signature in blue ink, consisting of a stylized, cursive letter 'M' followed by a large, rounded 'W'.

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**Martin Williams**  
Counsel for Hot Water Beach (NZ) Limited