

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF HAMILTON CITY COUNCIL**

UNDER the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER of Private Plan Change 17 to the Hamilton City
Operative District Plan ("**PC17**")

MEMORANDUM OF COUNSEL ON BEHALF OF FONTERRA LIMITED

15 DECEMBER 2025

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McAugh**

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MAY IT PLEASE THE PANEL:

1. Direction 5 issued by the Panel on 4 December 2025, outlined a process for the updated PC17 provisions to be discussed further between Fonterra and the Hamilton City Council ("**Council**") and for an update to be provided to the Panel for the timing of closing submissions.
2. Further to that Direction:
 - (a) On Friday 12 December 2025 the Council filed the updated PC17 provisions, following further discussion between Fonterra and the Council. These provisions outline the discrete areas where agreement has not been reached by the parties.
 - (b) Fonterra understands that the Council does not intend to provide any further information.
 - (c) Fonterra confirms that it intends to file its closing submissions on Tuesday 23 December 2025.

DATED 15 December 2025



Daniel Minhinnick / Meg Anderson
Counsel for Fonterra Limited