

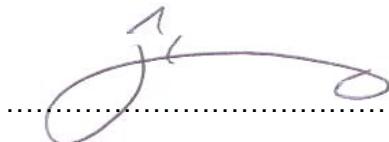
IN THE MATTER OF the Resource Management Act 1991
AND
IN THE MATTER OF Proposed Private Plan Change 13 to
the Hamilton City Operative District
Plan: Te Rapa Racecourse

Submitters Ecostream Irrigation Ltd
Takanini Rentors Ltd

**MEMORANDUM OF COUNSEL FOR SUBMITTERS IN RESPONSE TO
PROPOSER'S REPLY SUBMISSIONS**

1. I have only very rarely attempted to respond to reply submissions in a hearing of this type but in this case there is a point that I believe needs to be made. Legal counsel for the Proponent of the Plan Change submits at paragraph 47 of Reply Submissions that I *conceded that an economic analysis was only relevant if the entire land area owned by the Racing Club was it issue.*
2. I believe that mis-states the responses that I gave to the Hearing Panel in oral discussion. I believe that the point made was that such an analysis might not be as critical to the proposal if the plan change land and the surrounding racing club land were not so strategically important. That was certainly the point that was conveyed during that oral exchange.
3. I have checked the audio recording for day 2, towards the end of the recording for the period 11-16am to 12-25pm (starting approx. 1 hour into the recording) and have confirmed that the responses I gave to the Chair and Commissioner Beattie were to the effect that the strategic importance of this site in influencing future land use makes the need for economic evidence and for thought about broader land use in the locality particularly important.

Dated: 6 October 2023

A handwritten signature in black ink, appearing to read "P Lang", is placed above a dotted line.

P Lang, counsel for Ecostream Irrigation Ltd and Takanini Rentors Ltd