

**Before Hamilton City Council Independent Hearings Panel**

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of Plan Change 17 to the Hamilton District Plan

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**JOINT MEMORANDUM OF COUNSEL FOR EMPIRE CORPORATION AND PORTERS (“EMPIRE PORTERS”) AND HOROTIU FARMS LIMITED AND TE AWA LAKES UNINCORPOATED JOINT VENTURE LIMITED (“TAL”)**

**26 November 2025**

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**May it please the Hearings Panel for PC 17:**

1. TAL and Empire Porters acknowledge the Panel's direction #3 dated 14 November, and direction #4 dated 25 November 2025. Those directions address presentation of the Applicant's case.
2. Counsel propose that a similar approach is taken to presentation of the cases for TAL and Empire Porters, specifically that:
  - a. Submitters' evidence is also taken as read by the Panel;
  - b. Submitters' experts would address the Panel with a written summary of their evidence, along with a written response to the rebuttal evidence filed by the Applicant (the Applicant will have an opportunity for a final reply);
  - c. legal submissions are to be filed in advance and could be taken as read with counsel emphasising key points and answering any questions from the Panel.
3. Such an approach should enable the efficient presentation of each submitters' case (each has 3-4 witnesses, and legal submissions) within a 45-minute allocation, with up to (say) 15 minutes of additional time for any questions from the Panel.

Signed



**KATE BARRY-PICENO  
LEGAL COUNSEL FOR TAL**



**MARY HILL  
LEGAL COUNSEL FOR EMPIRE CORPORATION/PORTERS GROUP**

**26 November 2025**