

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT TAURANGA**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI TAURANGA**

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of the hearing of submissions on Proposed Plan
Change 92 (Ōmokoroa and Te Puke Enabling
Housing Supply and Other Supporting Matters)
(PC92) to the Operative Western Bay of Plenty
District Plan (WBOPDP)

MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND COMMUNITIES

28 SEPTEMBER 2023

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MAY IT PLEASE THE COMMISSIONERS:

1. Counsel refer to the memorandum provided by Mr Morne Hugo on behalf of Omokoroa Country Club (“**OCC**”) at the hearing of Plan Change 92.
2. That material was not available at the time Kāinga Ora filed its rebuttal evidence.
3. **Attached** and filed with this memorandum is a short supplementary statement of evidence from Ms Tait, responding to the memorandum provided by Mr Hugo. Counsel hereby seek leave to table the further statement.

Dated 28 September 2023



B J Matheson / A Cameron
Counsel for Kāinga Ora – Homes and Communities