

Before the Independent Hearings Panel
at Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Proposed private plan change RCP31 to the Operative
Waimakariri District Plan

and: **Rolleston Industrial Developments Limited**
Applicant

Memorandum of counsel

Dated: 30 June 2023

Reference: JM Appleyard (jo.appleyard@chapmantripp.com)
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MEMORANDUM OF COUNSEL

- 1 We act for Rolleston Industrial Developments Limited (*RIDL*), the applicant to private plan change 31 to the Operative Waimakariri District Plan (*PC31*).
- 2 Minute 1: Pre-Hearing Directions directed the Waimakariri District Council to file its Section 42A Report and supporting evidence by 4pm on Thursday 22 June 2023.
- 3 At 5pm on Thursday 22 June 2023, RIDL were informed by the hearings administrator that submitters to PC31 were sent the following email in the last hour:

"The Section 42A report (s42A) for the Private Plan Change RCP031 will be available on-line by 4pm Friday, 23 June 2023, following an extension of one working day granted by the Chair. Your submission or further submission is covered within the s42A report.

As set out in the Commissioner Minute 1, submitters that wish to be heard will be allocated 15 minutes to speak to their submission and are encouraged to collaborate to prepare joint presentations where they have issues in common. Minute 1 requires submitters who wish to be heard to confirm by 4pm, 30 June 2023."

- 4 The Section 42A Report was received the following day and RIDL are well advanced in the preparation of expert evidence for the hearing of PC31.
- 5 Minute 1 directs that expert evidence in support of RIDL's application must be filed by noon on Thursday 6 July 2023.
- 6 This memorandum seeks a brief extension to the date by which RIDL is required to file its expert evidence. RIDL respectfully requests an extension until **4pm Friday 7 July 2023** on the basis that:
 - 6.1 The extension being sought is equivalent to that which was granted for the Council's Section 42A Report;
 - 6.2 The Section 42A Report requests a range of further evidence be provided by the applicant; and
 - 6.3 No one would be prejudiced by this extension given it is:
 - (a) only brief; and
 - (b) well within the statutory timeframes, as the timeframes provided in Minute 1 were already generous.

7 We look forward to hearing from the Panel.

Dated: 30 June 2023



Jo Appleyard / Lucy Forrester
Counsel for various submitters