

**BEFORE THE INDEPENDENT HEARINGS PANEL
APPOINTED ON BEHALF OF THE WAIMAKARIRI DISTRICT
COUNCIL**

UNDER the Resource Management Act 1991

AND

IN THE MATTER OF the Waimakariri Proposed District
Plan - Hearing Stream 12E -
Rangiora, Kaiapoi, Woodend,
Variation 1

AND the submissions of B & A Stokes on
the Waimakariri Proposed District
Plan (#214) and Variation 1 (#29)

MEMORANDUM OF COUNSEL

Dated: 8 May 2024

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1 INTRODUCTION

- 1.1 This memorandum of counsel is filed on behalf of B and A Stokes (the **Stokes**).
- 1.2 The Stokes made submissions on the Proposed Waimakariri District Plan (**PDP**) and Variation 1 to the PDP, requesting the rezoning of their land at 81 Gressons Road and 1375 Main North Road, Waikuku (the **Site**) to General Residential and/or Medium Density Residential. The Site is approximately 144ha in area and is located between the Ravenswood development to the northwest of Woodend and Waikuku village.
- 1.3 Expert evidence in support of those submissions was filed on 4 March 2024, and included a detailed brief of evidence from Ms Natalie Hampson on economic and housing supply matters related to those submissions.
- 1.4 This memorandum outlines the Stokes' response to the Panel's request in Minute 24 for an update on progress regarding conferencing between the economic experts who have provided evidence in support of substantial rezoning requests.

2 RESPONSE

- 2.1 Ms Hampson is happy to participate in expert conferencing to address, *inter alia*, the matters raised by the Panel in its Minute 20 as they relate to Ms Hampson's evidence on the Stokes' submissions. This has previously been communicated to Mr Yeoman on multiple occasions.
- 2.2 Other than some minor clarifications that she has for Mr Yeoman regarding the way in which she has interpreted his modelling, Ms Hampson is satisfied that she has sufficient information to participate in conferencing.

DATED this 8th day of May 2024



R Murdoch
Counsel for B and A Stokes