

Before the Independent Hearings Panel
at Selwyn 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 on behalf of Rolleston Industrial
Developments Limited regarding question to Mr Yeoman

Dated: 14 August 2023

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MAY IT PLEASE THE HEARINGS PANEL

- 1 This memorandum of counsel is provided in response to Minute 4, which directs counsel for the Applicant to submit questions for Mr Yeoman to the Panel by close of business Monday 14 August 2023.
- 2 The questions that counsel wish to put to Mr Yeoman are set out in **Appendix 1** for the Panel's consideration and are intended to give the Applicant some more clarity as to the base assumptions Mr Yeoman used to prepare his evidence as to medium- and long-term capacity given that Formative has not been prepared to allow access to the model itself.
- 3 We look forward to hearing from the Panel.

Dated: 14 August 2023

A handwritten signature in blue ink, appearing to read 'Jo Appleyard', is positioned above a horizontal line.

Jo Appleyard / Lucy Forrester
Counsel for Rolleston Industrial Developments Limited

APPENDIX 1 – PROPOSED QUESTIONS TO MR YEOMAN

For the medium term:

- 1 Provide details of the total amount of greenfield capacity (with each subdivision listed, and total number of lots/capacity counted for that subdivision).
- 2 Provide details of the total amount of infill/intensification capacity.
- 3 What assumptions were made about the Kaiapoi qualifying matters and their impact on density?
- 4 Confirm evidence given at the hearing that NDAs/FDAs have not been counted in the medium-term.
- 5 Confirm evidence given at the hearing that no areas have been counted that include:
 - 5.1 Commercial areas;
 - 5.2 Preschools/day-care centres; or
 - 5.3 Kāinga-Ora, Ngāi Tahu or Retirement villages.
- 6 Confirm whether heritage sites or notable trees have been taken account of.

For the long term:

- 7 Provide details of the total amount of greenfield capacity (with each subdivision listed, and total number of lots/capacity counted for that subdivision).
- 8 Provide details of the total amount of infill/intensification capacity.
- 9 Confirm total numbers for NDAs/FDAs allowed for, including:
 - 9.1 List each individual NDA/FDA and total number of lots/capacity in each area;
 - 9.2 Area (in hectares);
 - 9.3 What has been subtracted in % (and hectares) for:
 - (a) Stormwater;
 - (b) Infrastructure;
 - (c) Reserves;
 - 9.4 What is the lot size assumed or hh/ha yield?

- 10 What assumptions were made about the Kaiapoi qualifying matters and their impact on density?

Infill/intensification capacity assumptions

- 11 Were restrictive covenants/encumbrances considerations incorporated and if so what were they?
- 12 Is it assumed demolition of the existing houses would occur or is intensification based on utilising the balance land of a parcel?
- 13 What access constraints were incorporated in determining additional dwellings on sections?
- 14 Were house shape or parcel shape considerations incorporated and if so what were they?