

Before the Independent Hearings Panel  
at Waimakariri District Council

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*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

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Dated: 24 August 2023

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Reference: JM Appleyard (jo.appleyard@chapmantripp.com)  
LMN Forrester (lucy.forrester@chapmantripp.com)

chapmantripp.com  
T +64 4 499 5999  
F +64 4 472 7111

PO Box 993  
Wellington 6140  
New Zealand

Auckland  
Wellington  
Christchurch



## MAY IT PLEASE THE HEARINGS PANEL

- 1 The Panel has now received all of the relevant information it requested in its Minute 4, including:
  - 1.1 Joint witness statements on:
    - (a) Planning constraints mapping;
    - (b) Public Transport;
    - (c) Stormwater/groundwater/flooding; and
    - (d) Transport;
  - 1.2 Responses from Mr Yeoman on capacity assumptions; and
  - 1.3 Mr Willis' supplementary statement of evidence.
- 2 The Applicant seeks leave to file supplementary evidence as set out below to cover matters that have arisen during the hearing from submitters. This will include supplementary evidence from:
  - 2.1 **Ms Laura Drummond** regarding investigations of potential further springs located on the site as raised by submitter Levinea Joris and requested by the Panel;
  - 2.2 **Mr Gary Sellars** regarding the verbal evidence he gave to the Panel on current housing supply in the market which the Panel requested he put into writing;
  - 2.3 **Mr Greg Akehurst** (and supported by additional information from Mr Gary Sellars) in response to the information provided by Mr Yeoman and whether his view regarding medium to long term capacity in the District has changed in light of this new information;
  - 2.4 **Mr Tim McLeod** responding to the remaining uncertainty Mr Willis has now raised regarding the potential for interception of groundwater by infrastructure;
  - 2.5 **Ms Nicole Lauenstein** responding to urban design matters raised by a number of residents, in particular Mr Grant Edge, and a consideration of Mr Willis' concern that the alternative kerb and channel design option (should investigations determine swales are not appropriate) would not maintain rural character;
  - 2.6 **Mr Tony Milne** responding to landscape matters raised by residents, in particular Mr Grant Edge; and

- 2.7 **Mr Tim Walsh** as to whether his opinions have changed in light of the new information, and whether there are any proposed changes to the proposed provisions and ODP as a result.
- 3 Counsel proposes that this supplementary evidence would be filed by **Tuesday 5 September 2023** on the basis that a number of the above experts and counsel have other commitments the week of 28 August 2023.
- 4 Counsel also requests that the hearing be reconvened for one day to allow the Panel to ask any questions of the Joint Witness Statement experts and/or of the above witnesses (if required), and to deliver closing legal submissions<sup>1</sup> on behalf of the applicant. Available dates include 11, 12 and 15 September and 18-21 September<sup>2</sup>.
- 5 We look forward to hearing from the Panel with any further directions.

Dated: 24 August 2023




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Jo Appleyard / Lucy Forrester  
Counsel for Rolleston Industrial Developments Limited

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<sup>1</sup> For completeness, counsel notes that the closing legal submissions will also include responses to the Panel's questions from Ms Barbara Warren.

<sup>2</sup> Please note Mr O'Neill is not available in the week of 18 September if the Panel have questions on the stormwater/groundwater/flooding Joint Witness Statement and Mr Milne is not available on 12 and 15 September if the Panel have further questions after the evidence referenced in 2.6 above.