

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT RANGIORA / WAIMAKARIRI**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI RANGIORA / WAIMAKARIRI**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions and further submissions on the **Proposed Waimakariri District Plan**

HEARING TOPIC: Stream 12

**MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND
COMMUNITIES**

5 MARCH 2024

Instructing solicitor:
C E Kirman
Special Counsel
Kāinga Ora - Homes and Communities
PO Box 14594
Central Auckland 1051
E: claire.kirman@kaingaora.govt.nz

Counsel instructed:
B J Matheson | A M Cameron
Richmond Chambers
PO Box 1008
Shortland Street
Auckland 1140
E: matheson@richmondchambers.co.nz

MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND COMMUNITIES

1. Counsel refer to Minute #20 of the Independent Hearing Panel, and the memorandum provided by Council officers on Strategic Directions dated 27 February 2024.
2. In that Minute, the Panel requested that expert conferencing occur on economic and urban growth issues, in advance of the hearings in Stream 12 - Rezonings.
3. Kāinga Ora does not have a direct interest in Stream 12, but a number of the questions that have been posed are relevant to matters to be canvassed as part of Stream 7 and Variation 1 – Residential and MDRS. To that end, counsel consider it would be beneficial to include expert economic witnesses for parties who intend to participate in Stream 7 and/or Variation 1 within the proposed expert caucusing, even if they are not presenting evidence as part of Stream 12. Otherwise, there is likely to be a degree of duplication between the two streams.
4. Counsel seek that the Panel make a further request¹ that expert economic witnesses who intend to file evidence as part of Stream 7 and/or Variation 1 are made available for the purposes of the foreshadowed expert caucusing.

Dated 5 March 2024



B J Matheson | A M Cameron

Counsel for Kāinga Ora – Homes and Communities

¹ Noting, as per Minute #20, that the Panel cannot direct expert caucusing in advance of a hearing commencing.