

**Before an Independent Hearings
Panel Appointed by the
Waimakariri District Council**

Under the Resource Management Act
1991

In the matter of submissions and further
submissions in relation to the
proposed Waimakariri District Plan

And

In the matter of Hearing Stream 10: Special
Purpose Zones

And submissions by Sports and
Education Corporation (**S&E Corp**)

**Legal Submissions on behalf of Sports
and Education Corporation Ltd
(Submitter 416)**

Dated: 9 February 2024

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1. These legal submissions are filed on behalf of Sports and Education Corporation (**S&E Corp**), a submitter and further submitter on the Special Purpose zone for Pegasus Resort (**SPZ (PR)**).
 2. S&E Corp has filed expert evidence in response to the Section 42A Report from:
 - (a) Melissa Pearson, Planning and Policy Consultant at SLR Consulting New Zealand Limited.
 3. Messrs Sam Huo and Tony Joseph, representing S&E Corp, will also be attending the hearing and can answer any questions the Panel may have regarding the Company's intentions for the future development of the Pegasus Resort Golf Resort.
 4. Ms Pearson's evidence addresses the very few points of disagreement with the recommendations in the Section 42A Report namely that:
 - (a) Identified SPZ(PR) related definitions are nested as "Commercial Activities";
 - (b) The definition of "commercial golf resort" is amended to expressly provide for "any ancillary workshop" in the context of the clause (e) of the definition that refers to "gift/ souvenir shop";
 - (c) SPZ (PR) – P3 is amended to provide for a more appropriate landscape intention.
 5. Ms Pearson's evidence and her associated recommended amendments will assist in making the District Plan more certain and provide for a clearer and better landscape direction for the future development of the SPZ(PR).
 6. Given the high level of agreement between Ms Pearson and the S42A Report I do not propose to provide detailed legal submissions at this stage. A sister company, DEXIN Investments Ltd is a submitter in relation to a SPZ (PR) rezoning request which is to be heard as part of Hearing Stream 12 and I will provide more detailed legal submissions at that stage if required.
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7. I also note that a site visit was not requested at part of the S&E Corp submission on the basis that it would be more efficient to undertake a combined site visit as part of Hearing Stream 12.



Amanda Dewar

Counsel for Sport and Education Corporation Ltd
