

Before the Independent Hearings Panel
at Waimakariri 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

Dated: 18 August 2023

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MAY IT PLEASE THE HEARINGS PANEL

- 1 This memorandum of counsel seeks to update the Panel as to the progress of the conferencing that has been occurring and to seek a short extension on one of the joint witness statements.
- 2 As directed by Minute 4, we have filed the following joint witness statements regarding the following matters with the Hearing's Administrator:
 - 2.1 Planning constraints mapping;
 - 2.2 Public Transport; and
 - 2.3 Stormwater/groundwater/flooding.
- 3 In terms of the traffic safety and network effects conferencing and joint witness statement, the experts have conferenced on the matters and have done their best to complete the joint witness statement by the required time.
- 4 However, as a result of other conflicting pressures, the experts require more time to finalise the joint witness statement. A request to **5pm Monday 21 August 2023** is sought.

Dated: 18 August 2023



Jo Appleyard / Lucy Forrester
Counsel for Rolleston Industrial Developments Limited