

Before the Hearing Panel
Appointed by the Waimakariri District Council

Under the Resource Management Act 1991

In the matter of hearing on submissions on the proposed Waimakariri District
Plan

Hearing Stream 12: Rezoning

Ravenswood Developments Limited

Submitter number: 347

Memorandum of Counsel on behalf of Ravenswood Developments Limited

1 March 2024

Submitter's solicitors:

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May it please the Commissioners:

- 1 This memorandum is filed on behalf of Ravenswood Developments Limited (**RDL**).
- 2 RDL seeks an extension for the filing of expert evidence for the proposed Waimakariri District Plan (**PWDP**) hearing for Stream 12: Rezoning, due Tuesday 5 March 2024.
- 3 For the purposes of the Rezoning hearing, RDL and Council are seeking to translate Plan Change 30 (**PC30**) to the operative District Plan, which provides for the expansion of the Ravenswood commercial area, into the PWDP. PC30 has been recently considered and approved, and is now operative.
- 4 In preparation for the Rezoning hearing, RDL has been engaging with Council staff and reporting officers on the drafting of PWDP provisions to reflect and give effect to the PC30 outcome within the new structure of the PWDP. The majority of that drafting is complete, however there remain several matters of detail to be finalised.
- 5 RDL considers it would be most efficient if the engagement with Council on the drafting of provisions was completed prior to RDL filing expert evidence. The provisions sought by RDL will be included with and assessed through RDL's evidence. Concluding engagement with Council on the drafting of provisions prior to evidence exchange is likely to avoid the need to circulate updated provisions later in the process, and to address changes to provisions through the s42A report and/or supplementary evidence.
- 6 RDL has discussed a potential extension to evidence exchange with Council (Matthew Bacon and reporting officer Andrew Willis). As the evidential assessment of the rezoning has been recently and rigorously considered through PC30, RDL will not be introducing new technical assessments of the merits of the rezoning that Council has not already received through PC30. Council has therefore indicated that it understands the reasons for the later circulation of RDL's evidence, and that it agrees that this will be a more efficient approach to the consideration of RDL's submission in the context of PC30.
- 7 RDL accordingly seeks an extension for the filing of its evidence for Stream 12 to **26 March 2024**.

Dated 1 March 2024



Sarah Eveleigh / Sarah Schulte

Counsel for Ravenswood Developments Limited