

Before an Independent Hearings Panel
Appointed by Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on the Proposed
Waimakariri District Plan and Variation 1

and: Hearing Stream 10A: Future Development Areas

and: **Carter Group Property Limited**
(Submitter 237)

and: **Rolleston Industrial Developments Limited**
(Submitter 160 and 60)

Memorandum of counsel on behalf of Carter Group Limited and
Rolleston Industrial Developments Limited seeking further
economic information

Dated: 22 January 2024

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MEMORANDUM OF COUNSEL ON BEHALF OF CARTER GROUP LIMITED AND ROLLESTON INDUSTRIAL DEVELOPMENTS LIMITED SEEKING FURTHER ECONOMIC INFORMATION

- 1 This memorandum of counsel is a request that the Panel direct the production of further information from the Waimakariri District Council, and the author of the recent economic assessment titled "Waimakariri Residential Capacity and Demand Model – IPI 2023" and dated 8 December 2023 prepared by Formative (*Report*).
- 2 The submitters are currently preparing economic evidence to support the rezoning request they have sought in respect of land in Ōhoka. The submitters' economists require this information in order to be able to prepare properly informed evidence due 27 February 2024.
- 3 The further economic information sought in relation to the Report is set out at **Appendix 1**. We respectfully request that this information is provided no later than **29 January 2024**.
- 4 The submitters will also be seeking a direction as to expert conferencing between it and the Council's economic experts following the release of the section 42A report on their rezoning request. The further information sought in this memorandum will also assist the submitters' economic experts in preparing for this expert conferencing.
- 5 We thank the Panel for its assistance in this matter.

Dated: 22 January 2024



Jo Appleyard / Lucy Forrester
Counsel for Carter Group Property Limited and Rolleston Industrial
Developments Limited

APPENDIX 1**Questions regarding Formative Report –****“Waimakariri Residential Capacity and Demand Model – IPI
2023 Economic Assessment – Dated 8 December 2023”**

- 1) Please provide a breakdown of the household/dwelling demand projections for the short-medium term (2023-2033) and the long-term (2023-2053) at the Statistics New Zealand SA2 level (for the entire Waimakariri District) as referred to within the 8 December 2023 report. Please state whether these figures include the competitiveness margin or not. Please provide a map showing the extent of each defined area.
- 2) If the above is unable to be provided at the SA2 level, then please provide the request at the finest spatial resolution available (please specify the boundaries used). Please provide a map showing the extent of each defined area
- 3) Please provide the total household/dwelling demand, supply, and sufficiency for the area of the Waimakariri District outside the Greater Christchurch Partnership boundary (as shown in the map below – highlighted ‘green’ area).
- 4) Please provide the ‘Feasible Supply’ (or capacity) raw data in Excel format which was used in the WCGM22. This should include:
 - a. Parcel ID
 - b. Township
 - c. Address
 - d. Land Area
 - e. Section size – plan enabled and Realistically Realisable that have been applied
 - f. Zone Name
 - g. Land value
 - h. Capital value
 - i. Current number of dwellings
 - j. Estimated medium term capacity
 - k. Estimated long term capacity

GREATER CHRISTCHURCH SPATIAL PLAN REGIONAL PLAN

