Before the Hearings Panel appointed by Waimakariri District Council

Under	the Resource Management Act 1991
In the matter of	a hearing on submissions on the proposed Waimakariri District Plan
	Hearing Stream 12A
	Ravenswood Developments Limited
	Submission Number: 347

Supplementary legal submissions on behalf of Ravenswood Developments Limited

5 June 2024

Submitter's solicitors: Sarah Eveleigh I Sarah Schulte Anderson Lloyd Level 3, 70 Gloucester Street, Christchurch 8013 PO Box 13831, Armagh, Christchurch 8141 P: + 64 3 379 0037 E: sarah.eveleigh@al.nz I sarah.schulte@al.nz

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May it please the Commissioners

- 1 Legal submissions filed on behalf of Ravenswood Developments Limited (RDL, Submission: 347) for Hearing Stream 12A sought that the Panel accept the amended PWDP provisions set out in Annexure 2 to the evidence of David Haines, with a further amendment in respect of TCZ-P1.
- 2 To clarify, the provisions in Mr Haines' Annexure 2 are largely identical to the recommended provisions contained in Mr Willis' section 42A report. The differences are:
 - (a) Mr Haines does not include amendments to definitions. RDL supports the amendments to the definitions of 'Key Activity Centre' and 'Principal Shopping Street', to include reference to North Woodend, as contained in the s42A report recommendations.
 - (b) In respect of the amendments to the **Introduction to the Town Centre Zone** section of the CMUZ chapter, RDL seeks that the Panel accept the wording contained in Mr Haines' Annexure 2.
 - (c) In respect of TCZ-P1, Mr Willis does not recommend any change. RDL now only seeks the deletion proposed by Mr Haines, and not the additional wording. As addressed in legal submissions filed, the wording sought by RDL is:

TCZ-P1 Town Centre hierarchy

Recognise that:

1. Rangiora and Kaiapoi are the District's principal town centres with significant established community services and public expenditure;

2. North Woodend is a new emerging centre that will provide opportunities over time for town centre activities—in the Woodend/Pegasus commercial catchment.

(d) Mr Haines and Mr Willis include the same additional words in TCZ-R1 and TCZ-R24, excluding application of these rules in the North Woodend TCZ. Mr Willis includes this wording at the beginning of the rule, while Mr Haines includes it in an advice note. RDL assume that Mr Willis has adopted a rule drafting structure consistent with the officer recommendations for other rules, and therefore supports the drafting provided in the s42A report. Dated 5 June 2024

Eveleigh

Sarah Eveleigh Counsel for Ravenswood Developments Limited