

Before an Independent Hearings Panel  
Appointed by Waimakariri District Council

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*under:* the Resource Management Act 1991

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

*and:* Hearing Stream 12D: Ōhoka rezoning request

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

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

Memorandum of counsel regarding further supplementary  
evidence

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Dated: 25 June 2024

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**MEMORANDUM OF COUNSEL REGARDING FURTHER  
SUPPLEMENTARY EVIDENCE**

- 1 This memorandum accompanies further supplementary evidence filed today by the Submitters in support of their rezoning request for hearing stream 12D Ōhoka.
- 2 The Submitters filed expert evidence supporting their rezoning request on 5 March 2024, and supplementary evidence on 13 June 2024 which responded to matters raised in the Officer's Report.
- 3 On 13 June 2024, other submitters filed expert evidence, namely the Oxford Ōhoka Community Board.
- 4 To assist the Panel, we have filed further supplementary evidence from the Submitters' experts addressing the expert evidence of the Oxford Ōhoka Community Board, but only to the extent that this evidence raised new information that had not yet already been addressed by the Submitters' experts in their evidence in chief, or supplementary evidence, and the responses would have been too long to include within the Panel's three page limit for summaries to be presented at the hearing.
- 5 We are trying to limit, as much as possible, the need for the Submitters' experts to present rebuttal evidence during the course of the hearing, with a preference to provide the Panel with all of the information it requires in written form ahead of the hearing so that it can be pre-read.
- 6 If we are required to seek leave to file this further supplementary evidence in advance of the hearing, then leave is formally sought through this memorandum.
- 7 We thank the Panel for its assistance in this matter.

Dated: 25 June 2024



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J M Appleyard / L M N Forrester  
Counsel for Rolleston Industrial  
Developments Limited