

Before the Selwyn District Council

under: the Resource Management Act 1991

in the matter of: Proposed Private Plan Change 69 to the Operative
District Plan: Lincoln South

and: **Rolleston Industrial Developments Limited**
Applicant

Memorandum of counsel in response to Minute 6

Dated: 9 May 2022

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MEMORANDUM OF COUNSEL IN RESPONSE TO MINUTE 6

- 1 This memorandum of counsel is prepared on behalf of Rolleston Industrial Developments Limited (the *Applicant*) in response to Minute 6 of the Commissioner dated 3 May 2022.
- 2 In his Minute, the Commissioner sought comments on two alternative methodologies he is considering for incorporating the transportation network upgrade provisions proffered by the Applicant at the hearing.
- 3 The Applicant has no further comments to make with respect to this issue, other than noting that its preferred method for incorporating the transportation network upgrade provisions was set out in Appendix 1 to its closing legal submissions following the hearing.
- 4 The Applicant will await the Commissioner's decision on the matter.

Dated: 9 May 2022



Jo Appleyard / Lucy Forrester
Counsel for Rolleston Industrial Developments Limited