

Before the Independent Hearings Panel
at Selwyn District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to the
proposed Selwyn District Plan

and: **Rolleston West Residential Limited**
Submitter DPR-0358

and: **Rolleston Industrial Developments Limited**
Submitter DPR-0384

and: **Rolleston Industrial Holdings Limited**
Submitter DPR-0374

and: **iPort Rolleston Holdings Limited**
Submitter DPR-0363

and: **CSI Property Limited**
Submitter DPR-0392

Memorandum of Counsel on behalf of submitters on rezoning
evidence

Dated: 6 October 2021

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MEMORANDUM OF COUNSEL ON BEHALF OF SUBMITTERS ON REZONING EVIDENCE

INTRODUCTION

- 1 We act for the following parties:
 - 1.1 Rolleston West Residential Limited (DPR-0358);
 - 1.2 Rolleston Industrial Developments Limited (DPR-0384);
 - 1.3 Rolleston Industrial Holdings Limited (DPR-0374);
 - 1.4 iPort Rolleston Holdings Limited (DPR-0363); and
 - 1.5 CSI Property Limited (DPR-0392) (together 'the *Submitters*').
- 2 The Submitters have all lodged submissions seeking rezoning of land. These requests are set out in the table at **Appendix 1**. This table also indicates what expert evidence the Submitters intend to file in relation to these requests, and what development stage each of the requests are up to (the *Rezoning Requests*).
- 3 The purpose of this memorandum is to seek a short extension on the filing of evidence for some of the rezoning requests made by the Submitters.

REZONING REQUEST EVIDENCE

- 4 The evidence in support of rezoning requests is due on **22 October 2021**. The Panel in its first Minute dated 8 June 2021 made it clear that the level of evidence expected for each request was high, and should include a robust s32AA further evaluation report and all supporting technical information.
- 5 The Rezoning Requests are at various stages of development (see **Appendix 1**). These range from:
 - 5.1 rezonings that are the subject of plan changes to the Operative District Plan (the *Operative Plan*) which have had evidence produced and hearings concluded;¹ to
 - 5.2 plan changes to the Operative Plan yet to be heard but subject to upcoming evidence timetables (such as Plan Change 69);² to

¹ iPort Block (DPR-0363, submission point 001), Holmes Block (DPR-0358, submission point 001), and Skellerup Block (DPR-0358, submission point 002).

² Lincoln South (DPR-0384, submission points 008 and 009).

- 5.3 plan changes to the Operative Plan that have recently been lodged;³ to
 - 5.4 potential plan changes which are at an advanced stage but not yet lodged with Council but will be in the short term;⁴ to
 - 5.5 potential plan changes which are in progress but are unlikely to be lodged with Council before 22 October 2020.
- 6 The Submitters and their various experts are currently working hard to meet the date of 22 October 2021, however, it has become apparent that a short extension on the filing of some evidence might be required for some of the Rezoning Requests in order to reach the level of information required by the Panel (and commensurate to the level of information being provided by Submitters in their capacity as proponents on the private plan changes).
- 7 We note that there is a high degree of cross-over between the experts being used by the various submitters, with almost all of the experts required to provide multiple briefs of evidence on multiple rezoning requests (see **Appendix 1**). This is a significant amount of work for some of the experts and therefore the extension we are seeking is largely to provide them with enough time to prepare evidence that is relevant, well-considered and of the high level expected by the Panel as well as meet time frames of the various hearings underway relating to the Operative Plan changes.
- 8 The Panel will be provided with evidence relating to the following Rezoning Requests by **22 October 2021** (refer to **Appendix 1** for full details):
- 8.1 Holmes Block (DPR-0358, submission point 001);
 - 8.2 Skellerup Block (DPR-0358, submission point 002);
 - 8.3 LFRZ Block (DPR-0384 and DPR-0374, submission points 001);
 - 8.4 iPort Block (DPR-0363, submission point 001);
 - 8.5 Skellerup South 2 (DPR-0392, submission point 003);
 - 8.6 Hororata Block (DPR-0392, submission point 006);
 - 8.7 Two Chain Road (DPR-0392, submission point 007);
 - 8.8 Collins/Days Block (DPR-0392, submission point 009); and

³ Two Chain Road (DPR-0391, submission point 007).

⁴ Skellerup South 2 (DPR-0392, submission point 003).

8.9 West Melton Block (DPR-0392, submission point 010).

LINCOLN SOUTH REZONING REQUEST

- 9 Rolleston Industrial Developments Limited in its submission sought to rezone land in Lincoln currently undergoing a plan change to the Operative District Plan (Plan Change 69). This plan change relates to the Lincoln South rezoning request (DPR-0384, submission points 008 and 009) as shown in **Appendix 1**.
- 10 A copy of the plan change application can be lodged by 22 October but as for the detailed evidence, the evidence for the hearing of Plan Change 69 is due on **Thursday 4 November 2021**. The evidence that will be provided to the Panel on this particular rezoning request will in essence be identical to that which the applicant will file under the plan change process.
- 11 To better align with the plan change timeframes for providing evidence (which will greatly assist the experts in managing their workloads) we request that the rezoning evidence for this particular request be extended to **Monday 15 November 2021** to align with the evidence due date under the plan change process.

OTHER REZONING REQUESTS REQUIRING EXTENSION

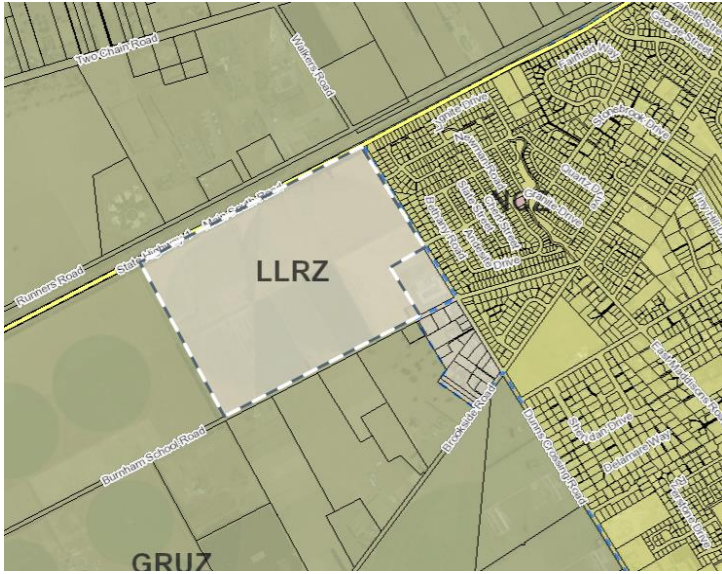
- 12 There are some other rezoning requests not set out above that the experts consider will be difficult to meet the deadline provided by the Panel because of the stage they are at, and as such, we also request that these be provided with an extension to **Monday 15 November 2021**. These are:
 - 12.1 Skellerup South 1 (DPR-0392, submission point 002); and
 - 12.2 Skellerup North (DPR-0392, submission point 008 and further submission point 018); and
 - 12.3 Collins/Springs Block (DPR-0392, submission point 001).
- 13 We look forward to receiving a response from the Panel regarding our request for a short extension on evidence for the Lincoln South Skellerup South 1, Skellerup North, and Collins/Springs Block.


Dated 6 October 2021

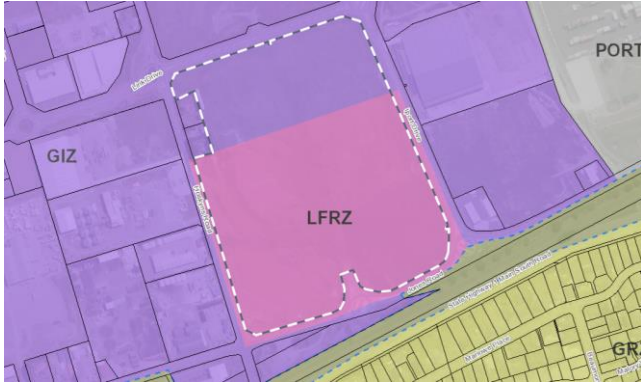
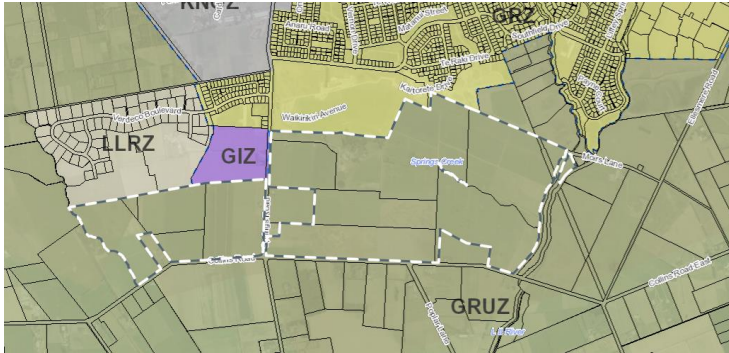



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Counsel for the Submitters

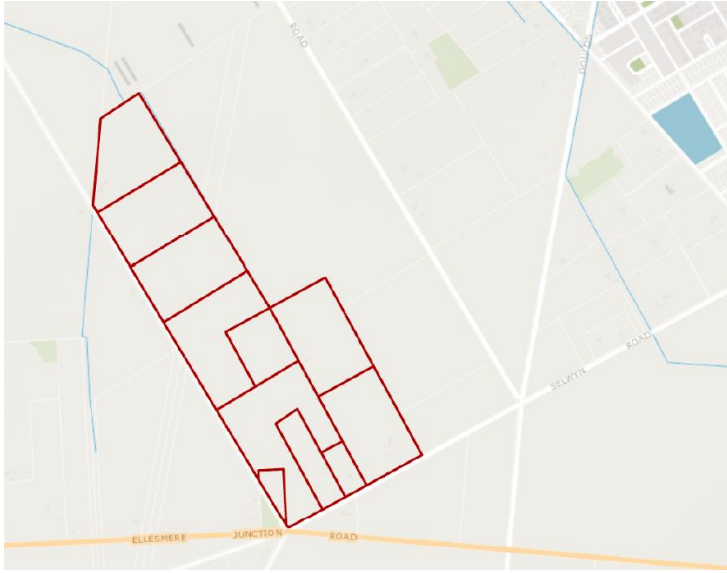
APPENDIX 1


Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
Rolleston West Residential Limited (DPR-0358)	001	<p>'Holmes Block'</p>  <p>'Holmes Block', being the 87.5 hectare property situated on the southwest corner of Dunns Crossing Road and Main South Road, Rolleston (Section 2 Survey Office Plan 480906 RT 686982).</p>	From LLRZ to GRZ and NCZ.	Subject to Plan Change 73 to the Operative District Plan. Evidence has been filed and the hearing has concluded.	Planning Economics x3 Real estate Infrastructure GHG Emissions Visual amenity x2 Odour x2 Noise Traffic Geotech Contaminated land Ecology	No.


Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
Rolleston West Residential Limited (DPR-0358)	002	<p>'Skellerup Block'</p>  <p>'Skellerup Block', being the 72.7 hectare property situated on the west side of Dunns Crossing Road, approximately midway between Selwyn Road and Brookside Road (Part Rural Section 31354, Part Rural Section 31356 and Part Section 4 Reserve 1342).</p>	From LLRZ to GRZ and NCZ.	Subject to Plan Change 73 to the Operative District Plan. Evidence has been filed and the hearing has concluded.	Planning Economics x3 Real estate Infrastructure GHG Emissions Visual amenity x2 Odour x2 Noise Traffic Geotech Contaminated land Ecology	No.


Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
<p>Rolleston Industrial Developments Limited (DPR-0384)</p> <p>Rolleston Industrial Holdings Limited (DPR-0374)</p>	<p>001</p> <p>001</p>	<p>'LFRZ Block'</p>  <p>Lot 600 DP 520689, bounded by Link Drive, Iport Drive, Jones Road and Hoskyns Road.</p>	From GIZ and LFRZ to LFRZ in its entirety.	N/A – being advanced only through the Proposed District Plan Process.	<p>Planning</p> <p>Economics</p> <p>Traffic</p>	No.
Rolleston Industrial Developments Limited (DPR-0384)	008, 009	<p>'Lincoln South'</p> 	From GRUZ to GRZ, NCZ, and LCZ.	Subject to Plan Change 69 to the Operative District Plan. Evidence is due 4 November 2021 . Hearing to be held 22 - 26 November.	<p>Planning</p> <p>Economics x3</p> <p>Real estate x2</p> <p>Infrastructure</p> <p>GHG Emissions</p> <p>Visual amenity x2</p> <p>Odour x2</p>	Yes.


Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	001	<p>'Collins/Springs Block'</p>  <p>185 Collins Road: Lot 1 DP 4864, Lot 2 DP 455360.</p>	From GRUZ to GRZ.	Plan change unlikely to be lodged with Council by 22 October.	Planning Economics x3 Real estate Infrastructure Visual amenity Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land	Yes.


Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	002	<p>'Skellerup South 1'</p>  <p>Land bounded by Edwards Road, Dunns Crossing Road and Selwyn Road: Lot 1 DP 72132, Lot 2 DP 72132, Lot 1 DP 20007, Lot 3 DP 72132, Lot 1 DP 74061, Lot 2 DP 491231, Lot 2 DP 74801, Pt RES 1045, Lot 1 DP 26197, Lot 1 DP 491231, Lot 1 DP 74801.</p>	From GRUZ to GRZ.	Plan change unlikely to be lodged with Council by 22 October.	Planning Economics x3 Real estate Infrastructure Visual amenity Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land Ecology	Yes.

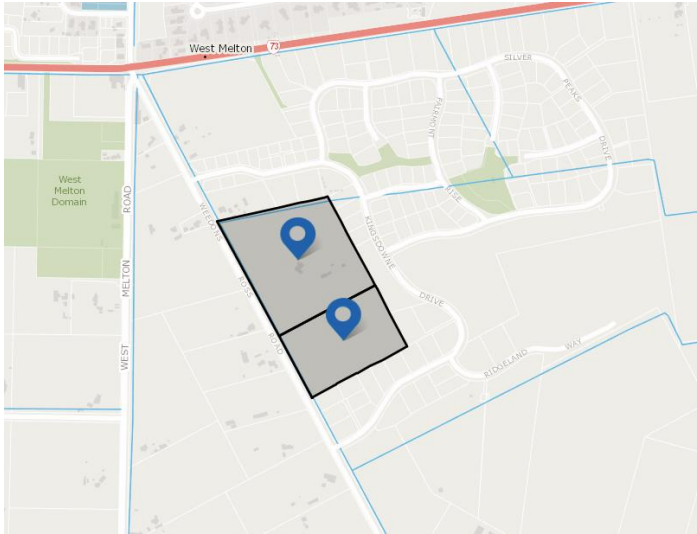
Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	003	<p>'Skellerup South 2'</p>  <p>Selwyn Road/Dunns Crossing Road corner: RS 25807 and RS 23614 Leeston Road.</p>	From GRUZ to GRZ.	Plan change being prepared and anticipated to be lodged in the next 1-2 weeks.	Planning Economics x3 Real estate Infrastructure Visual amenity x2 Traffic GHG Emissions Geotech Contaminated land Ecology	No.

Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	006	<p>'Hororata Block'</p>  <p>1240 Hartnells Road, Hororata: Pt Lot 3 DP 5202, Lot 1 DP 321259, Pt Lot 2 DP 5205, RS 38459, Lot 1 DP 6261, Pt Rural Sec 22205 SO 5202.</p>	From GRUZ to GRZ and NCZ/LCZ.	Plan change unlikely to be lodged with Council by 22 October.	<ul style="list-style-type: none"> Planning Economics x3 Real estate Infrastructure Visual amenity Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land 	No.

Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	007	<p>'Two Chain Road'</p>  <p>Land bounded by Two Chain Road, Walkers Road and State Highway 1: Lot 1 DP 33398, Lot 2 DP 33398, Lot 1 DP 33996, Lot 2 DP 33996, Lot 3 DP 33996, Lot 2 DP 305466, Lot 1 DP 305466, Lot 5 DP 33996, Lot 6 DP 33996, Lot 1 DP 27804, Lot 2 DP 27804, Lot 3 DP 59950, Lot 1 DP 310517.</p>	From GRUZ to GIZ.	Plan change was lodged on 5 October 2021 (being referred to as Plan Change 80). Currently being check for completeness by the District Council	Planning Economics x3 Real estate Infrastructure Visual amenity x2 Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land Ecology	No.

Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	008 and FS018	<p>'Skellerup North'</p>  <p>Dunns Crossing Road, Brookside Road and Edwards Road: Lot 1 DP 82068, Lot 4 DP 20007, Lot 3 DP 20007.</p>	From GRUZ to GIZ.	Plan change unlikely to be lodged with Council by 22 October.	Planning Economics x3 Real estate Infrastructure Visual amenity Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land Ecology	Yes.

Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	009	<p>'Collins/Days Block'</p>  <p>Land located at the northeast corner of Collins Road and Days Road: Lot 1 DP 70466, Lot 2 DP 70466, Lot 3 DP 70466, Lot 4 DP 70466, Lot 5 DP 70466, Lot 6 DP 70466, Lot 7 DP 70466, Lot 2 DP 361975, Pt RS 2456, Lot 3 DP 2086, Pt Lot 4 DP 2086, Lot 1 DP 361975, Pt Lot 1 DP 2086, Pt Lot 2 DP 2086.</p>	From GRUZ to GRZ.	Plan change unlikely to be lodged with Council by 22 October.	Planning Economics x3 Real estate Infrastructure Visual amenity Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land	No.

Submitter	Submission point	Map/Location	Request	Stage	Experts required	Extension sought?
CSI Property Limited (DPR-0392)	010	<p>'West Melton Block'</p>  <p>664 Weedons Ross Road: Lot 1 DP 26732 and Lot 2 DP 26732.</p>	From GRUZ to GRZ.	Plan change unlikely to be lodged with Council by 22 October.	<ul style="list-style-type: none"> Planning Economics x3 Real estate Infrastructure Visual amenity Versatile soils Traffic GHG Emissions Noise Geotech Contaminated land 	No.