

Before the Independent Commissioner

Under the Resource Management Act 1991

In the matter of an application by Foodstuffs (South Island) Properties Limited for the establishment and operation of a PAK'nSAVE supermarket and fuel station at 191 Main North Road, and associated car parking, vehicle access, landscaping, signage, and storm water treatment (RMA/2018/2029)

Memorandum of Counsel on behalf of Foodstuffs (South Island) Properties Limited in response to Minute 1

7 October 2019

Applicant's solicitors:

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May it please the Commissioner

- 1 This memorandum is filed on behalf of Foodstuffs (South Island) Properties Limited (the **Applicant**) in response to Minute 1 of the Commissioner, dated 24 September 2019 (**Minute 1**). This memorandum addresses the following:
 - (a) pre-hearing discussions and conferencing;
 - (b) expert witnesses to be called, their area of expertise, and the availability of each expert to conference with other experts; and
 - (c) requests for visits to particular sites or localities.

Pre-hearing discussions and conferencing

- 2 The Applicant is seeking to resolve and narrow issues prior to hearing, and will continue to engage with submitters through pre-hearing meetings and expert witness conferencing as appropriate. In particular, discussions are currently occurring for transportation matters as detailed below. On or before 31 October 2019 I will provide an update as to progress of all pre-hearing discussions and conferencing.

Transportation

- 3 Technical representatives on behalf of Christchurch City Council, New Zealand Transport Agency, Christchurch Transport Operations Centre, and the Applicant have met for informal conferencing on 10 September, 20 September, and 2 October 2019. The parties are in the process of finalising a Joint Witness Statement (**JWS**). The JWS will be provided to Ms Ferrari for circulation.
- 4 The Applicant has met with passenger transport and planning representatives for Canterbury Regional Council (**CRC**) on 11 September. At that time additional modelling was being undertaken as part of the informal conferencing process. The Applicant will now arrange for a further meeting with CRC to present and discuss the additional modelling.

Expert witnesses and availability

- 5 The expert witnesses to be called, their area of expertise, and availability are as follows:
 - (a) Niko Young, architect, available to caucus on the following dates:
 - (i) 8 – 9 October;
 - (ii) 11 – 15 October;

- (iii) 18 – 22 October; and
 - (iv) 24 – 29 October.
- (b) Tony Milne, landscape architect, available to caucus on the following dates:
 - (i) 10 – 11 October;
 - (ii) 17 – 18 October; and
 - (iii) 21 October.
- (c) Paul Durdin, transport, available to caucus on the following dates:
 - (i) 15-16 October;
 - (ii) 18 October;
 - (iii) 21 October; and
 - (iv) 24 – 25 October.
- (d) Dave Smith, transport, available to caucus on the following dates:
 - (i) 15-16 October;
 - (ii) 18 October;
 - (iii) 21 October; and
 - (iv) 24 – 25 October.
- (e) Rob Hay, acoustic, available to caucus on the following dates:
 - (i) 10 – 14 October;
 - (ii) 16 October;
 - (iii) 18 – 23 October; and
 - (iv) 25 – 31 October.
- (f) Mark Taylor, ecology, available to caucus in October.
- (g) Keegan Brogden, engineer, stormwater design, available to caucus in October.
- (h) Fraser Colegrave, economics, available to caucus on the following dates:

- (i) 8 – 14 October; and
 - (ii) 19 - 31 October.
- (i) Mark Allan, planning, available to caucus on the following dates:
- (i) 8 – 10 October;
 - (ii) 12 – 15 October;
 - (iii) 17 – 22 October;
 - (iv) 24 October;
 - (v) 26 – 29 October; and
 - (vi) 31 October.

Sites or localities to visit

- 6 The Applicant anticipates the Commissioner will take a detailed walk through the site subject of RMA/2018/2029, at 191 Main North Road, as a matter of course, and does not otherwise have specific requests.
- 7 The Applicant requests the Commissioner visits the following additional sites or localities:
- (a) The Local Centre at Wainoni, which contains a PAK'nSAVE supermarket, a fuel station, and commercial sites.

Dated this 7th day of October 2019



Alex Booker
For the Applicant