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

- 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

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.

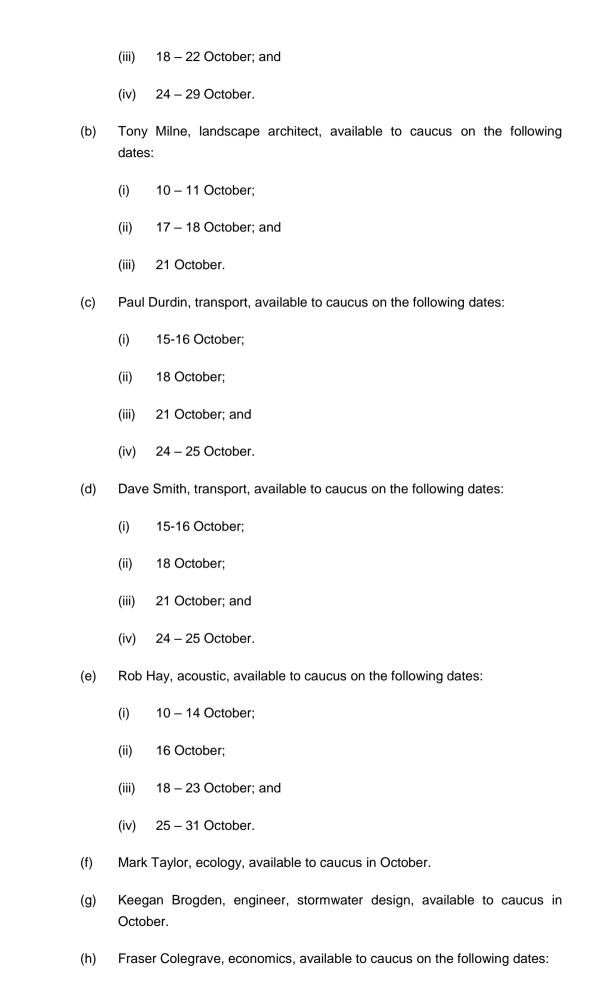
Transportation

- 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.
- 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

- 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;

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- (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

- 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

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Alex Booker

For the Applicant

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