

Before an Independent Commissioner appointed by Tasman District Council

In the Matter of the Resource Management Act 1991

And

In the Matter of Tasman Resource Management Plan

And

In the Matter of Proposed Private Plan Change 62 – Richmond North Commercial Zone

Memorandum of Counsel on behalf of
Progressive Enterprises Limited
regarding filing further supplementary
evidence and joint witness statements

Dated: 20 December 2016

Introduction

1. This memorandum of counsel is filed on behalf of Progressive Enterprises Limited (**Proponent**) in relation to the Commissioner's Minutes 9, 10 and 11.
2. These minutes contain directions relating to assessment of the cross shopping impacts of the Plan Change on the Stoke Centre and the Joint Witness Statements (**JWS**) produced as a result of conferences of the planners subsequent to the hearing.
3. The following documents are filed in accordance those minutes:
 - (a) Second Supplementary Statement of Evidence of Derek Foy;
 - (b) Second Supplementary Statement of Evidence of Mark Tansley;
 - (c) A planning JWS regarding transportation options including a methods analysis; and
 - (d) A planning JWS regarding amendments made during and subsequent to the hearing and associated section 32AA table.
4. For completeness these documents follow the earlier filing of the following documents by the Proponent in accordance with those same minutes:
 - (a) Supplementary Evidence of Derek Foy on 18 November 2016;
 - (b) Supplementary Evidence of Gary Rae on 18 November 2016;
 - (c) Supplementary Evidence of Mark Tansley on 18 November 2016;
 - (d) Economic JWS on 5 December 2016;
 - (e) Summary Schedule of Assessed Impact Potentials as at 2018 on 5 December 2016; and
 - (f) Economic JWS regarding cross-shopping effects on 13 December 2016.

5. Subject to any alternative directions of the Commissioner, Counsel signals their intention to file a clean *Proponent Version* of the PC62 provisions at the time of filing closing legal submissions.

A handwritten signature in blue ink, appearing to read 'J M G Leckie'.

A C Dewar / J M G Leckie

Counsel for Progressive Enterprises Limited