
**BEFORE THE CHRISTCHURCH REPLACEMENT
DISTRICT PLAN INDEPENDENT HEARING PANEL**

IN THE MATTER OF The Resource Management Act 1991 and
the Canterbury Earthquake (Christchurch
Replacement District Plan) Order 2014

AND

IN THE MATTER OF Direction 3 to the Terms of Reference -
Exemplar Housing Areas

**FOURTH MEMORANDUM ON BEHALF OF
DANNE MORA HOLDINGS LIMITED IN RESPECT OF SCOPE OF HEARING AND STATEMENT OF ISSUES**

4. Work on redrafting the assessment matters in line with 3 (b) above is underway, the expectation being that final agreement will be achieved early in the week commencing 15 December 2014.
5. As at the time of filing, neither Ms Scott for the Council nor Mr. Allen for the Crown have been unable to review and therefore confirm agreement with the contents of this Memorandum. It is expected that both Ms. Scott and Mr. Allen will be position to review and respond by Monday 15 December 2014.

Agreement with Submitters/ Further Submitters

6. As set out in the Third Memorandum, Danne Mora has reached agreement with the following relevant submitters/ further submitters:
 - i. Riccarton/ Wigram Community Board;
 - ii. Spreydon/ Heathcote Community Board;
 - iii. Halswell Residents Association;
 - iv. Mike Mora; and
 - v. Terrace Developments Limited.
7. Agreement with the Riccarton/ Wigram and Spreydon/ Heathcote Community Boards and Mr. Mora was reached at a facilitated mediation on Saturday 06 December 2014.
8. Subsequent to the mediation, both Community Boards have filed separate memoranda with the Independent Secretariat on Monday 08 December 2014 confirming that they no longer oppose development of the Exemplar Housing Area.
9. Counsel received e-mail advice from a representative of the Halswell Residents Association on Wednesday 10 December 2014, advising that the Association would go along with Riccarton/ Wigram Community Board's withdrawal of its opposition.
10. Also by e-mail dated 10 December 2014, Mr. Mora advised that he was:

"OK from withdrawing personally but would like my submission to be available to the panel"
11. Mr. Mora's position may be regarded by the Panel as somewhat ambiguous. However, rather than take further issue with the submitter, Danne Mora simply suggests that it will file affidavit evidence from a suitably qualified expert that addresses the principal concern (flooding) set out in Mr. Mora's submission. Counsel fully anticipates that the Panel would expect evidence of this nature to be filed in order for you to be satisfied that rezoning of the Exemplar land from rural to residential is appropriate.
12. Copies of the e-mail correspondence from Mr. Mora and the representative of the Halswell Residents Association have been provided to the Independent Secretariat.

19. Counsel takes the opportunity to acknowledge the assistance of all other parties to date in this matter.

G J Cleary

A handwritten signature in black ink, consisting of a large, stylized 'G' followed by 'J' and 'Cleary' in a cursive script.

On behalf of Danne Mora Holdings Limited/ Spreydon Lodge Limited