

Before the Independent Hearings Panel

Under the Resource Management Act 1991 and the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

And

In the Matter of the proposed Christchurch Replacement District Plan
(Chapter 7: Transport)

Memorandum of Counsel seeking leave
to be excused from Transport Chapter for
Te Ngāi Tūāhuriri Rūnanga, Te Hapū o
Ngāti Wheke, Te Rūnanga o
Koukourārata, Ōnuku Rūnanga, Wairewa
Rūnanga, Te Taumutu Rūnanga and Te
Rūnanga o Ngāi Tahu [1145/1448]

Dated: 18 June 2015

Lane Neave
LAWYERS

179 Victoria Street
PO Box 2331
Christchurch
Solicitor Acting: J M G Leckie
Phone: 03 379 3720
Fax: 03 379 8370
Email: joshua.leckie@laneneave.co.nz

MAY IT PLEASE THE PANEL;

1. Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga and Te Rūnanga o Ngāi Tahu (**Ngāi Tahu**) sought amendments to Chapter 7 Transport (Part) of the Replacement District Plan (**the Plan**) that sought to:
 - (a) Ensure the inclusion of all members of the community in public places, including kaumātua and those with mobility impairment.
 - (b) Ensure more emphasis is placed on accessibility to commercial and community facilities with an aging population.
 - (c) Ensure that the development and operation of the transport network does not degrade but instead protects and enhances Ngāi Tahu cultural values including but not limited to: impacts on wāhi tapu, wāhi taonga, cultural landscapes and mahinga kai.
2. Ms Lynch filed evidence on behalf of Ngāi Tahu confirming that the relief sought by Ngāi Tahu has been included in the revised wording to 7.1.1.1 Policy 1 and 7.1.1.8 Policy 8 and contained in the revised Transport Chapter dated 14 May 2015. Ms Lynch also confirmed that the removal of the Ngāi Tahu Manawhenua values in 7.1.1.2 Policy 2 and assessment matters in 7.3.19 as contained in the proposed “submitter version” of the High Traffic Generator Provision did not impact on the overall relief sought in the Ngāi Tahu submission.
3. Counsel notes that all of these amendments have been carried through to the latest version of the Transport Chapter attached to the rebuttal evidence of Mr Falconer dated 17 June 2015.
4. No parties have sought leave to cross examine Ms Lynch.

5. If the Panel does not have any questions of Ms Lynch, Ngāi Tahu respectfully seeks leave that both Ngāi Tahu and Ms Lynch be excused from attending the hearing in relation to the Transport Chapter.

Dated this 18th day of June 2015



J M G Leckie