

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 14: Residential)

Memorandum of Counsel for Te Rūnanga
o Ngāi Tahu and ngā rūnanga [1145]
requesting additional topics to the issues
statement

Dated: 25 February 2015


Lane Neave
LAWYERS

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MAY IT PLEASE THE HEARINGS PANEL;

1. Counsel refers to the Updated Statement of Issues dated 23 February 2015 filed on behalf of the Council for the Residential Proposal.
2. Te Rūnanga o Ngāi Tahu and ngā rūnanga's submission on the Residential Chapter related to two discrete topics being:
 - a. Appropriate recognition of **Ngai Tahu cultural values** in the Proposal in particular in relation to the treatment of stormwater discharge, setbacks from waterways, and the dual heritage of Christchurch; and
 - b. **Papakāinga housing.**
3. As these are discrete topics, it appears there is potential to carve these off and add these additional issues to those identified by the Council.
4. Counsel respectfully seeks a direction that these be added to the Statement of Issues.

Dated this 25th day of February 2015

A handwritten signature in black ink, appearing to read 'J E Walsh', is written over a horizontal line. The signature is stylized and cursive.

J E Walsh