

BEFORE THE CHRISTCHURCH REPLACEMENT  
DISTRICT PLAN HEARINGS 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 the Subdivision,  
Development and  
Earthworks Stage 1

---

MEMORANDUM OF COUNSEL ON BEHALF OF CHRISTCHURCH CITY  
COUNCIL REGRADING PROVISION 8.3.3.1 TABLE 1

29 July 2016

---

*Granted*  
*1/8/16*  


---

 **Simpson Grierson**  
Barristers & Solicitors

Simpson Grierson  
D J Laing / C G Coyle  
Telephone: +64-4-924 3511  
Facsimile: +64-4-472 6986  
Email: duncan.laing@simpsongrierson.com; charlotte.coyle@simpsongrierson.com  
DX SX11174  
PO Box 2402  
WELLINGTON

**MAY IT PLEASE THE PANEL:**

1. This Memorandum is filed on behalf of Christchurch City Council (**Council**), following the Council's memorandum of Counsel dated 20 July 2016 regarding the Halswell West exemptions in 8.3.1.1<sup>1</sup> Table 1 (**Rule**).
2. Following the filing of that memorandum, the Council has been engaged in consultation with the Secretariat of the Independent Hearings Panel. These discussions have identified a scope issue in terms of the power to amend the requested provision. This is due to the Council making the relevant request in a Stage 1 submission, despite the provision being heard in Stage 2.
3. Consequently, the Council respectfully seeks leave to withdraw its memorandum of 20 July 2016. The Council apologises for any inconvenience caused.
4. The Council has identified the interested submitters who submitted on the Rule and have served them with this memorandum:
  - (a) 473, 1392, 2097: Fulton Hogan Limited;
  - (b) 1034: McFarlane Family;
  - (c) 2474: Antony Pan and San Tsun Yu;
  - (d) 2475: R J and C B Sissons;
  - (e) 2476: Bromac Lodge Limited;
  - (f) 2477: Martin Harcourt; and
  - (g) 2478: Mercantile Trust.

DATED this 29<sup>th</sup> day of July 2016



---

D J Laing / C G Coyle  
Counsel for Christchurch City Council

---

<sup>1</sup> Renumbered as 8.3.3.1 from May 2016.