

**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** the Christchurch Replacement District Plan

**SUBMITTER** **CANTERBURY EARTHQUAKE RECOVERY AUTHORITY  
FOR AND ON BEHALF OF THE CROWN**  
(Submitter 495)

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**MEMORANDUM OF COUNSEL FOR THE CROWN IN RESPONSE TO THE  
MEMORANDUM BY CHRISTCHURCH CITY COUNCIL REGARDING THE NEW  
NEIGHBOURHOOD ZONE PROVISIONS**

**Subdivision Proposal**

Dated: 20 May 2015

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**MAY IT PLEASE THE HEARINGS PANEL:**

1. This memorandum is filed on behalf of the Crown in response to the memorandum of counsel by Christchurch City Council ("**Council**") regarding the New Neighbourhood Zone Provisions ("**NNZ Provisions**") dated 12 May 2015.
2. Amongst other things, the Council's application:
  - (a) requests that the Hearings Panel defers making a decision on the NNZ Provisions and relevant definitions which were within the scope of the Residential hearing until it has completed the hearing on Proposal 8: Subdivision, Development and Earthworks (part)<sup>1</sup>; and
  - (b) advises that the Council considers that the objective and policy framework in both Proposal 14: Residential and Proposal 8 do not require amendment.<sup>2</sup>
3. The Crown supports the Council's request to defer decision making on the NNZ Provisions and relevant definitions until the Hearings Panel has heard the evidence for Proposal 8.
4. Notwithstanding the Council's position on the objective and policy framework in Proposals 8 and 14, the Crown wishes to reserve its ability to produce evidence and comment on the applicable policy framework, including in relation to the need for policy guidance on the content of Outline Development Plans.

Dated 20 May 2015



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**C Carranceja / J Silcock**  
Counsel for the Crown

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<sup>1</sup> See paragraphs 6-8 and 19(1) of the Council's memorandum dated 12 May 2015.

<sup>2</sup> See paragraphs 16 and 17 of the Council's memorandum dated 12 May 2015.