

**IN THE MATTER**

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

**AND**

**IN THE MATTER**

of the Proposed Christchurch Replacement District  
Plan

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**MEMORANDUM OF COUNSEL FOR SCENTRE (NEW ZEALAND) LIMITED IN  
RELATION TO LIQUEFACTION RULE 5.9.1 OF THE NATURAL HAZARDS  
CHAPTER**

**19 JANUARY 2015**

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**RUSSELL McVEAGH**

B J Matheson / D J Minhinnick  
Phone +64 9 367 8000  
Fax +64 9 367 8163  
PO Box 8  
DX CX10085  
Auckland

**MAY IT PLEASE THE HEARINGS PANEL:**

1. We act for Scentre (New Zealand) Limited ("**Scentre**") in relation to the Proposed Christchurch Replacement District Plan.
2. This memorandum relates to the Memorandum of Counsel on behalf of Christchurch City Council ("**Council**") regarding Liquefaction Rule 5.9.1 of the Natural Hazards Chapter, dated 19 December 2014.
3. Scentre raised a concern in its submission that Rule 5.9.1, as drafted, suggests that there are no permitted activities in Liquefaction Assessment Areas 1 and 2.<sup>1</sup> These areas cover the majority of Christchurch, including Scentre's site in Riccarton.
4. The Council's Memorandum clarifies that this was not the intention of Rule 5.9.1. It proposes an amendment to Rule 5.9.1 to ensure that the liquefaction rules apply only to the listed restricted discretionary activities, and that all other activities are permitted in Liquefaction Assessment Areas, subject to compliance with the General Procedures in Rule 5.12 and any other relevant rules in the Natural Hazards Chapter.
5. Scentre considers that the amendment proposed by the Council addresses its concerns in relation to Rule 5.9.1, and therefore supports the Council Memorandum. This was Scentre's only concern in relation to the Natural Hazards Chapter. Accordingly, subject to the Council continuing to support the amendment through caucusing, mediation and the hearings process, Scentre confirms that it will not need to file evidence or speak at the hearing of the Natural Hazards Chapter.

**DATED:** 19 January 2015



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**Bal Matheson / Daniel Minhinnick**  
Counsel for Scentre (New Zealand) Limited

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<sup>1</sup> Submission point 13, pages 9 - 10.