

**BEFORE THE PROPOSED CHRISTCHURCH REPLACEMENT DISTRICT
PLAN INDEPENDENT HEARINGS PANEL**

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

AND

IN THE MATTER of Heinz Wattie's Limited's submission on stage 1 of
the proposed Christchurch Replacement District
Plan

MEMORANDUM OF COUNSEL ON BEHALF OF HEINZ WATTIE'S LIMITED

DATED 19 DECEMBER 2014

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LAWYERS

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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of Heinz Wattie's Limited (**Heinz Wattie's**), which is a submitter on stage 1 of the proposed Christchurch Replacement District Plan (**Proposed Plan**). This memorandum responds to the Independent Hearings Panel's direction of 3 December 2014 requiring any submitter who has not clearly specified relief sought by way of amended provisions, for all stage 1 proposals, to lodge with the Independent Secretariat, and serve on the Council, on or before 5pm Friday 19 December 2014 the relief they are seeking with reference to the provisions of the Proposed Plan.
2. We consider that it is not necessary for Heinz Wattie's to provide further information of the specific relief sought by it in relation to the Proposed Plan as sufficient detail has already been provided in its submission:
 - (a) Paragraph 25 of Heinz Wattie's submission sets out the relief sought by Heinz Wattie's in sufficient detail for the Hearings Panel and other parties to understand the specific amendments sought by Heinz Wattie's to the Proposed Plan.
 - (b) Paragraphs 12 to 24 of Heinz Wattie's submission sets out the provisions of the Proposed Plan to which the relief sought by Heinz Wattie's relates.
 - (c) The structure of Heinz Wattie's submission and the level of detail provided in the submission dealing with the relief sought meets the requirements of Form 5 of the Resource Management (Forms, Fees, and Procedures) Regulations 2003.

DATED at Auckland this 19th day of December 2014



D R Clay / S de Groot

Counsel for Heinz Wattie's Limited