

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
(Proposal 1: Introduction and Proposal 2: Definitions)

Closing Legal submissions on behalf of Te
Rūnanga o Ngāi Tahu and Ngā Rūnanga
[1145/1448]

Dated: 17 July 2015

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LAWYERS

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May it please the Panel;

1. These closing legal submissions are filed on behalf of Te Rūnanga o Ngāi Tahu and Ngā Rūnanga (**Ngāi Tahu**) in relation to the Introduction and Definitions Proposals (**Proposals**).
2. Ngāi Tahu's submission on the Introduction Proposal was satisfactorily addressed in the revised version agreed between the Crown, Council and Ngāi Tahu.¹
3. At the hearing the Panel raised with Ms Murchison some questions it had in relation to some of the explanatory terms², a reference to wording of the Waitangi Tribunal³ and the inclusion of a reference to section 6(e)⁴.
4. Ms Murchison has responded to these questions in supplementary evidence which is filed along with these submissions⁵. To assist the Panel, Ms Murchison has recommended some textual changes which are intended to assist in the understanding of the Proposal. Ngāi Tahu accordingly supports the agreed version of the Introduction Proposal⁶ subject to the inclusion of Ms Murchison's recommendations.
5. In relation to the Definitions Proposal, evidence and legal submissions have already been filed on behalf of Ngāi Tahu or other parties at previous hearings in relation to all of the definitions Ngāi Tahu submitted on. A summary table of where in previous evidence these definitions have been addressed was provided in Ngāi Tahu's opening submissions.

Dated this 17th day of July 2015



J E Walsh
Counsel for Te Rūnanga o Ngāi Tahu and Ngā Rūnanga

¹ Which is attached to the Joint Memorandum on behalf of various parties (filed on 10 July 2015).

² Transcript Chapter 1 and 2 at pages 136 - 137

³ Transcript Chapter 1 and 2 at page 138, lines 41-46 and page 139, lines 1-21.

⁴ Transcript Chapter 1 and 2 at page 139, lines 23-45 and page 140, lines 1-7.

⁵ Filed and dated 17 July 2015

⁶ Attached to the Joint Memorandum on behalf of various parties (filed on 10 July 2015).