

**BEFORE THE CHRISTCHURCH REPLACEMENT
DISTRICT PLAN INDEPENDENT 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 submissions and further submissions on the Proposed Christchurch Replacement District Plan (Chapter 2 – Definitions (Part))

**MEMORANDUM OF COUNSEL FOR THE ISAAC CONSERVATION AND WILDLIFE
TRUST (SUBMITTER 704)**

DEFINITIONS HEARING

Tavendale and Partners

Lawyers, Christchurch
Level 3, Tavendale and Partners Centre, 329 Durham Street North
PO Box 442,
Christchurch 8140

Telephone: (03) 374-9999, Facsimile (03) 374-6888

Solicitor acting: Alanya Limmer / Georgina Hamilton

MAY IT PLEASE THE HEARINGS PANEL:

- 1 This Memorandum is filed on behalf of The Isaac Conservation and Wildlife Trust (**ICWT**) in relation to the upcoming hearing of submissions on Chapter 2 (Definitions) of the Proposed Christchurch Replacement District Plan (**Replacement Plan; Definitions Proposal**).
- 2 The ICWT made a submission on Stage 1 of the Replacement Plan (Submission No. 704). In relation to the Definitions Proposal, the ICWT's submission sought amendments to the definitions of "industrial activity", "mineral extraction activity" and "sensitive activities".
- 3 Evidence to be called by Christchurch City Council (**Council**) on the Definitions Proposal was filed and served on 9 June 2015. The ICWT understands from that evidence the Council proposes to delete the definition of "mineral extraction activity" from the Replacement Plan on the basis that it is no longer proposed to be referred to in the Replacement Plan and is to be replaced by a new definition of "quarrying activity" proposed as part of the Stage 2 proposals.
- 4 The ICWT accepts the Council's proposal to delete the definition of "mineral extraction activity" and no longer seeks to pursue the relief sought in its submission regarding that term. It is, however, noted a consequential amendment is required to the "reliant definitions" section of the revised "Industrial Activity" definition. Namely, deletion of "mineral extraction activity" and insertion of "quarrying activity".
- 5 In addition:
 - 5.1 the matters raised in The ICWT's submission regarding the definition of "industrial activity" were addressed as part of the Industrial Proposal; and
 - 5.2 The ICWT no longer seeks to pursue the relief sought in its submission regarding the term "sensitive activities".
- 6 Accordingly, The ICWT does not intend to file evidence on the Definitions Proposal and respectfully seeks leave to be excused from attendance at the Definitions Hearing in relation to these aspects of its Stage 1 submission.

Dated: 23 June 2015



A C Limmer / G C Hamilton

Counsel for The Isaac Conservation and Wildlife Trust

GCH-116681-1-91-V1