

Before the Independent Hearings Panel  
at Christchurch

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

*in the matter of:* submissions and further submissions in relation to the proposed Christchurch Replacement District Plan (Chapter 10: Designations and Heritage Orders)

*and:* **Christchurch International Airport Limited**  
*Submitter 863 / F-1359*

Memorandum of counsel seeking leave to be excused from  
Definitions Chapter hearing for Christchurch International Airport  
Limited

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Date: 10 July 2015

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REFERENCE: JM Appleyard (jo.appleyard@chapmantripp.com)

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**MEMORANDUM OF COUNSEL SEEKING LEAVE TO BE EXCUSED  
FROM DEFINITIONS CHAPTER HEARING FOR CHRISTCHURCH  
INTERNATIONAL AIRPORT LIMITED**

May it Please the Panel:

- 1 Christchurch International Airport Limited (*CIAL*) – submitter number 863, further submitter number 1359 sought various amendments to the Definitions chapter, the majority of which were addressed in evidence at previous hearings.
- 2 **Mr Bonis** filed evidence on behalf of *CIAL* on the remaining definitions still requiring attention. That evidence outlines *CIAL*'s approach and generally records agreement with the evidence of Council witnesses. However, there were two outstanding issues relating to the definitions of 'sensitive activities' and 'boarding house'.
- 3 In their rebuttal evidence, **Mr Stevenson** and **Mr Thomson** registered their agreement with the suggested amendments put forward by **Mr Bonis** with regards to those two outstanding matters.
- 4 No parties have sought leave to cross examine **Mr Bonis**.
- 5 If the Panel does not have any questions of **Mr Bonis**, *CIAL* respectfully seeks leave that both **Mr Bonis** and *CIAL* be excused from attending the hearing in relation to the Definitions chapter.

Dated: 10 July 2015



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**JM Appleyard**  
Counsel for Christchurch  
International Airport Limited