

**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))

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**MEMORANDUM OF COUNSEL FOR THE CANTERBURY AGGREGATE PRODUCERS  
GROUP (SUBMITTER 886)**

**DEFINITIONS HEARING**

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**MAY IT PLEASE THE HEARINGS PANEL:**

- 1 This Memorandum is filed on behalf of the Canterbury Aggregate Producers Group (**CAPG**) 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 CAPG made a submission on Stage 1 of the Replacement Plan (Submission No. 886). In relation to the Definitions Proposal, the CAPG's submission sought:
  - 2.1 amendments to the definitions of "mineral extraction activity", "trade supplier" and "building supplier"; and
  - 2.2 inclusion of new definitions for the terms "mineral", "regionally significant activities" and "clean fill".
- 3 Evidence to be called by Christchurch City Council (**Council**) on the Definitions Proposal was filed and served on 9 June 2015. The CAPG understands from that evidence the Council:
  - 3.1 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.
  - 3.2 rejects the relief sought by the CAPG as regards the term "clean fill" on the basis that a definition for that term is proposed to be included in the Replacement Plan as part of the Stage 2 proposals.
  - 3.3 otherwise rejects the relief sought by the CAPG in relation to the definitions of "trade supplier", "building supplier" and "regionally significant activities".
- 4 Counsel has conferred with Ms Viskovic, Counsel for the Council, who has confirmed the Council's position in this regard.
- 5 The CAPG 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 the terms "mineral", "clean fill", "trade supplier", "building supplier" and "regionally significant activities".

- 6 It is 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”.
- 7 Accordingly, the CAPG 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: 22 June 2015



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A C Limmer / G C Hamilton

Counsel for the Canterbury Aggregate Producers Group