

**BEFORE THE CHRISTCHURCH REPLACEMENT  
DISTRICT PLAN 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 the Residential  
(part) Proposal and  
the Commercial (part)  
Proposal, both Stage 2

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**JOINT MEMORANDUM OF COUNSEL ON BEHALF OF CHRISTCHURCH CITY  
COUNCIL, EVERY IMPORT LIMITED (#2052) AND JULIAN SANDERSON  
(#2045)**

15  
~~18~~ SEPTEMBER 2015

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 **Simpson Grierson**  
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**MAY IT PLEASE THE PANEL:**

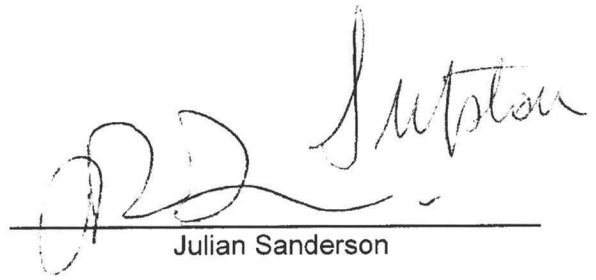
1. This memorandum of counsel is filed on behalf of the Christchurch City Council (**Council**), Julian Sanderson and Every Import Limited. The purpose of this memorandum is to inform the Panel that the Council has accepted the relief set out in the following submissions:
  - 1.1 Every Imports Limited (#2052)
  - 1.2 Julian Sanderson (#2045).
2. There are no further submissions to either submission.
3. Julian Sanderson's land at 21 Beresford Street and Every Import Limited's land at 23 Beresford Street in New Brighton is zoned Business 2 Park in the Operative City Plan. Both parcels of land were notified as Residential Suburban Density Transition in the proposed Replacement District Plan (in Stage 2). In their submissions, both Julian Sanderson and Every Import Limited sought to zone their respective parcels of land Commercial Core instead of Residential Suburban Density Transition.
4. The zoning and location of 21 and 23 Beresford Street are shown on the map attached as **Attachment A**.
5. The Council has considered these requests for rezoning, and accepts the rezoning to Commercial Core for both parcels of land, because of the location of the properties between the car park and proposed commercial zone on the other three corners of the intersection. Both submissions also sought rezoning on the basis that at 306m<sup>2</sup> they would fall below the minimum residential lot size of 330m<sup>2</sup>.

DATED this 15<sup>th</sup> day of September 2015



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J G A Winchester / S J Scott / M D Leslie  
Counsel for Christchurch City Council



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Julian Sanderson

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Stephen Marshall  
On behalf of Every Import Limited

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Julian Sanderson



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Stephen Marshall  
On behalf of Every Import Limited

**ATTACHMENT A: Planning map of 21 and 23 Beresford Street, New Brighton**

