

**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 Subdivision,  
Development and  
Earthworks Proposal  
(Part) Hearing (Stage 2)

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**MEMORANDUM OF COUNSEL ON BEHALF OF CHRISTCHURCH CITY COUNCIL  
REGARDING INTENDED RESPONSE TO PANEL'S MINUTE DATED 9 JUNE 2016  
AND SEEKING AN EXTENSION OF TIME**

**ALSO RELEVANT TO THE RESIDENTIAL NEW NEIGHBOURHOOD PROPOSAL**

**14 June 2016**

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 **Simpson Grierson**  
Barristers & Solicitors

Simpson Grierson  
M G Conway / C J McCallum  
Telephone: +64-3-968 4030  
Facsimile: +64-3-379 5023  
Email: catherine.mccallum@simpsongrierson.com  
PO Box 874  
SOLICITORS  
CHRISTCHURCH 8140

**MAY IT PLEASE THE PANEL:**

**1. INTRODUCTION**

**1.1** This memorandum of counsel is filed on behalf of the Christchurch City Council (**Council**) in relation to the Stage 2 Chapter 8: Subdivision, Development and Earthworks Proposal (Part) (**Proposal**). The purpose of this memorandum is to clarify what the Council intends to provide in response to the Minute of the Independent Hearings Panel (**Panel**), dated 9 June 2016 (**Minute**). In addition, this memorandum seeks an extension of time to provide that response to the Panel.

**2. INTEGRATED CHAPTER 8**

**2.1** In the Minute, the Panel commented that it would be of assistance if the Council provided a further update of its integrated Residential New Neighbourhood (**RNN**) provisions in a way that shows how its Subdivision Stage 2 provisions would integrate and accord with the drafting style of those in Decision 13. At paragraph [4] of the Minute, the Panel directed that by 4pm Friday 17 June 2016 the Council is to file an update of its integrated RNN provisions incorporating as a comprehensive set of provisions:

- (a) the Chapter 13 provisions (greyed out);
- (b) the integrated RNN provisions, using colour tracking; and
- (c) the Council's proposed Subdivision Stage 2 provisions, using different colour tracking.

**2.2** Following clarifying conversations with the Independent Secretariat, the Council confirms that it will provide an integrated Chapter 8 showing the following:

- (a) Black text – Decision 13 Subdivision, Development and Earthworks: Stage 1 (part) text;
- (b) Blue text – Subdivision, Development and Earthworks (Stage 2) text (clean) as filed with the Council's Closing Legal Submissions on 23 November 2015;

- (c) **Purple text** – Residential New Neighbourhood Chapter 8 text as filed with the Council's Closing Legal Submissions on 6 April 2016; and
- (d) **Green underlined text** – identifying definitions.

**2.3** The Council also notes that there are some corrections required to the Subdivision, Development and Earthworks Stage 2 Proposal, as well as the Stage 3 Proposal, which will be set out in more detail in the memorandum filing the integrated Chapter 8. These changes will not be tracked into the chapter, but will be set out clearly in attachments.

**2.4** The Panel also requested, through the Council's conversations with the Independent Secretariat, that the Council was to provide a table showing how the Appendices will be renumbered and renamed in the integrated Chapter 8. This table is attached at **Attachment A**.

### **3. EXTENSION OF TIME SOUGHT**

**3.1** The Council advises it will be difficult to accurately integrate the text from the sources listed in paragraph 2.2 above in time to file by 4 pm Friday 17 June. This is because the chapter will need to be comprehensively checked in order to ensure accurate cross referencing and that all relevant definitions are identified.

**3.2** Therefore the Council respectfully seeks an extension to file the integrated Chapter 8 by **4pm Wednesday 22 June 2016**, and consequentially, an extension for any other party who wishes to raise any issue concerning the updated provisions so filed to respond by **4pm Monday 27 June 2016**.

**DATED** this 14<sup>th</sup> day of June 2016



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M G Conway / C J McCallum  
Counsel for Christchurch City Council

## ATTACHMENT A

### RECOMMENDED RE-TITLING OF APPENDICES FOR CHAPTER 8 AND RESIDENTIAL NEW NEIGHBOURHOOD ZONE OUTLINE DEVELOPMENT PLANS

**Key:**

Black text: Chapter 8 Stage 1 (except RNN)

Blue text: Chapter 8 Stage 2 (except RNN)

Purple text: Residential New Neighbourhood Zone Outline Development Plans (any stage and through submission)

Orange text: Chapter 8 Stage 3 (through submission)

Location		Notified or Latest Revised Proposal Name/Title under the pRDP	Proposed Final Number (if changed from 'Latest Revised Proposal')	Proposed Final Name (if changed from 'Latest Revised Proposal')
Notified	Latest Revised Proposal			
8.6.1	8.6.1	Esplanade reserve and strip schedule		
8.6.2	8.6.2	Access standards		
8.6.3	8.6.3	New road standards		
8.6.4	8.6.4	North Halswell Outline Development Plan		
8.6.5	8.6.5	Buchanans Road Outline Development Plan and New Neighbourhood South Masham Outline Development Plan. New Neighbourhood South Masham - Outline Development Plan - Movement Network New Neighbourhood South Masham - Outline Development Plan - Green and Blue Network		South Masham Outline Development Plan
8.6.6	8.6.6	Residential Suburban and Residential Medium Density - Halswell West		
8.6.7a 8.6.7b 8.6.7c 8.6.7d	8.6.7a 8.6.7b 8.6.7c 8.6.7d	Cashmere and Worsleys Outline Development Plan - Spur Planting and Tracks around Area 4 Cashmere and Worsleys Outline Development Plan - Cashmere and Worsleys Cashmere and Worsleys Outline Development Plan - Cashmere / Hoon Hay/Worsleys Roads Intersection Cashmere and Worsleys Outline Development Plan - Cashmere and Worsleys	8.6.7	Cashmere and Worsleys Development Plan

Location		Notified or Latest Revised Proposal Name/Title under the pRDP	Proposed Final Number (if changed from 'Latest Revised Proposal')	Proposed Final Name (if changed from 'Latest Revised Proposal')
Notified	Latest Revised Proposal			
8.6.8	8.6.8	Moncks Spur Outline Development Plan Moncks Spur		Moncks Spur Development Plan
8.6.9	8.6.9	Richmond Hill Outline Development Plan Richmond Hill		Richmond Hill Development Plan
8.6.10	8.6.10	Takamatua Outline Development Plan Takamatua Comprehensive Development Plan		Takamatua Development Plan
8.6.11	8.6.11	Robinsons Bay Outline Development Plan Robinsons Bay Comprehensive Development Area		Robinsons Bay Development Plan
8.6.12	8.6.12	Samarang Bay Outline Development Plan - Samarang Bay Concept Plan		Samarang Bay Development Plan
8.6.13	8.6.13	Allandale Outline Development Plan Allandale Concept Plan		Allandale Development Plan
8.6.15 a 8.6.15 b 8.6.15 c 14.10.22	8.6.26	Outline Development Plan (Highfield Park) North Outline Development Plan (Highfield Park) South Highfield Park Outline Development Plan		Highfield Park Outline Development Plan
8.6.16	8.6.16	Kennedys Bush/Cashmere Road 2008 Outline Development Plan Kennedys Bush / Cashmere Road 2008		Kennedys Bush/Cashmere Road Development Plan
NA <sup>1</sup>	8.6.22	Hunters Road, Diamond Harbour	8.6.14	Hunters Road Development Plan
14.10.7.0 – 14.10.7.7	8.6.28	Yaldhurst Outline Development Plan		
14.10.8.0 – 14.10.8.6	8.6.24	East Belfast Outline Development Plan		
14.10.9.0 – 14.10.9.9	8.6.30	Awatea Outline Development Plan		
14.10.10.0 – 14.10.10.9	8.6.29	Wigram Outline Development Plan		
14.10.11.0 - 14.10.11.10	8.6.25	Prestons (North and South) Outline Development Plan		

1 Please note that this Development Plan is part of Stage 3. However, it is included here to ensure there is no misunderstanding regarding the numbering.

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Notified	Latest Revised Proposal			
14.10.12.0 – 14.10.12.12	8.6.23	North West Belfast Outline Development Plan		
14.10.13	14.10.13	Hawthornden Road Outline Development Plan	8.6.15	
8.6.14 14.10.14 14.10.23 14.10.24	8.6.27	Upper Styx Outline Development Plan		
14.10.15	8.6.18	Hendersons Outline Development Plan		
14.10.16	8.6.20	South Halswell Outline Development Plan		
14.10.17	8.6.19	South East Halswell Outline Development Plan		
14.10.18	8.6.21	South West Halswell Outline Development Plan		
14.10.19	8.6.22	South East Belfast Outline Development Plan		
NA	8.6.17	Riccarton Park (Riccarton Racecourse) Outline Development Plan		