

**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 Christchurch Replacement District Plan

SUBMITTER **CANTERBURY REGIONAL COUNCIL** (Submitter 2249)

**MEMORANDUM OF COUNSEL FOR THE CANTERBURY REGIONAL
COUNCIL IN RELATION TO FILING EVIDENCE ON STAGE 2 PROPOSALS**

11 August 2015

**WYNN WILLIAMS
LAWYERS
CHRISTCHURCH**

Solicitor: M A Mehlhopt
(michelle.mehlhopt@wynnwilliams.co.nz)

Canterbury Regional Council's
Solicitor
Level 5, Wynn Williams House
47 Hereford Street,
P O Box 4341, CHRISTCHURCH
Tel 0064 3 3797622
Fax 0064 3 3792467

MAY IT PLEASE THE HEARINGS PANEL:

- 1 At the Stage 2 Pre Hearing Meetings, Counsel indicated that at this stage the Canterbury Regional Council ("CRC") does not intend to produce evidence on the Stage 2 Proposals on which CRC has sought to be heard (excluding those matters that are to be deferred and heard as part of Stage 3).
- 2 The Stage 2 issues on which the Canterbury Regional Council has sought to be heard are set out in the table below:

Chapter / Proposal		Issue
8	Subdivision, Development and Earthworks	Exemptions from earthworks rules for hazard mitigation activities.
12	Hazardous Substances and Contaminated Land	The location of sensitive activities in close proximity to bulk fuel supply and storage infrastructure In Lyttelton and the Oil Companies' request for emergency management procedures in relation to bulk fuel supply at Lyttelton Port.
14	Residential zones	The appropriateness of zoning as notified by the Council of land at Awatea.
16	Industrial zones	The appropriateness of zoning as notified by the Council of land at Awatea.
17	Rural zones	The management of plantation forestry on Rural Banks Peninsula, including the management of wilding pine risk.

- 3 The CRC remains hopeful that these issues can be resolved prior to the hearings and therefore CRC's involvement in the hearings will not be required and evidence will not need to be called.
- 4 However, the CRC wishes to indicate that in the unlikely event matters are not resolved or otherwise addressed by other parties, then if required the CRC may call planning evidence on these issues.

Dated this 11th day of August 2015

M A Mehlhopt
Counsel for Canterbury Regional Council