

**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 of pre-hearing meetings 7 (Chapter 7), 9 (Chapter 17), 13 (Chapter 6), and 14 (Chapter 2)

**MEMORANDUM OF COUNSEL ON BEHALF OF THE CANTERBURY AGGREGATE
PRODUCERS GROUP (SUBMITTER ID: 2331)**

06 AUGUST 2015

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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 advance of the pre-hearing meeting 9.
- 2 CAPG has made submissions and further submissions on Stages 1 and 2 of the proposed Christchurch Replacement District Plan.
- 3 This memorandum is filed to assist with the efficient conduct of the pre-hearing meetings by foreshadowing the witnesses CAPG anticipates calling in support of its submissions.

Pre-Hearing Meeting 7 – Chapter 7 (Transport)

- 4 The CAPG called evidence and presented submissions in the Stage 1 hearing on Chapter 7. It has not submitted on Stage 2 of the Proposal and does not intend calling evidence or argument at this time.

Pre-Hearing Meeting 9 – Chapter 17 (Rural)

- 5 CAPG's submission on Chapter 17 addresses various provisions of Chapter 17 affecting quarrying and aggregate resources within the Rural and Rural Quarry zones.
- 6 It notes submissions in respect of the Rural Quarry zone provisions have also been made by Fulton Hogan Limited (Submitter ID: 2455) and The Isaac Conservation and Wildlife Trust (Submitter ID:2146). These two submitters and CAPG will be sharing resources on the quarrying provisions.
- 7 The witnesses CAPG anticipates calling in respect of Chapter 17 are as follows:
 - 7.1 An economic expert;
 - 7.2 A quarry industry consultant (demand and supply);
 - 7.3 A landscape expert;
 - 7.4 An air quality expert (potentially);
 - 7.5 3 industry representatives;
 - 7.6 A traffic expert;
 - 7.7 An acoustic expert; and

7.8 A planning witness.

8 Ultimately the evidence could be less depending on the outcomes of mediation and expert conferencing processes.

Pre-Hearing Meeting 13 – Chapter 6 (General Rules and Procedures)

9 CAPG has submitted on the standards applicable to the Rural and Rural Quarry zones, and submitted on Airport related restrictions relating to landfilling and excavation.

10 The witnesses CAPG anticipates calling in relation to Chapter 6 are as follows:

10.1 An industry representative;

10.2 An acoustic expert; and

10.3 A planning witness.

Pre-Hearing Meeting 14 – Chapter 2 (Definitions)

11 CAPG has also submitted on relevant definitions including definitions of ancillary aggregates processing activity, clean fill, quarrying activity, quarry site rehabilitation and rural activity.

12 It is anticipated the definitions submitted on by CAPG will be dealt with in the course of relevant Chapter hearings. For any definitions that fall outside this, CAPG would likely call expert planning evidence.

Dated: 06 August 2015



A C Limmer
Counsel for the Canterbury Aggregate Producers Group