

Before the Independent Hearings Panel
at Christchurch

under: the Resource Management Act 1991 and the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

in the matter of: submissions and further submissions in relation to the proposed Christchurch Replacement District Plan

and: of the Subdivision, Development and Earthworks Proposal (Part) Hearing- (**Stage 2**)

and: **Lyttelton Port Company Limited**
Submitter 2367 / F- 2808

Joint Memorandum of Counsel on the Subdivision, Development and Earthworks Chapter

Date: 12 October 2015

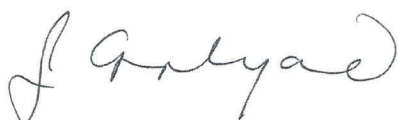
REFERENCE: JM Appleyard (jo.appleyard@chapmantripp.com)

**JOINT MEMORANDUM OF COUNSEL ON THE SUBDIVISION,
DEVELOPMENT AND EARTHWORKS CHAPTERS MEDIATION**

May it please the Panel:

- 1 Lyttelton Port Company Limited (*LPC*) attended mediation and targeted mediation with Christchurch City Council (*CCC*) (*the Parties*) on provisions of the Stage 2 Subdivision, Development and Earthworks Chapter.
- 2 The Parties agreed at that mediation and targeted mediation that provisions applying to the Specific Purpose (Lyttelton Port) Zone should be removed from the Chapter as those matters have been dealt with as part of the Lyttelton Port Recovery Plan.
- 3 The position reached is reflected in the evidence of Andrew Jeffrey Long dated 5 October 2015.
- 4 On that basis, LPC does not anticipate a need for it to file evidence or be heard at the hearing (but will do so in the event other submitters on the Chapter disagree with Mr Long's evidence on this point).

Dated: 12 October 2015



JM Appleyard
Counsel for Lyttelton Port Company Limited



D J Laing
Counsel for Christchurch City Council