

**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 the Proposed Christchurch Replacement Plan:
Chapter 8 Subdivision, Development and Earthworks

MEMORANDUM OF COUNSEL FOR FOLLOWING SUBMITTERS

- **Submitter 2474 – A Pan & S Tsun Yu**
- **Submitter 2475 – RJ & CB Sissons**
- **Submitter 2476 – Bromac Lodge**
- **Submitter 2477 – Martin Harcourt**
- **Submitter 2478 – Mercantile Trust**

REGARDING CHAPTER 8 HEARING

Dated 23 October 2015

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Lawyers
Rangiora

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MAY IT PLEASE THE PANEL

1. This Memorandum is filed on behalf of the following submitters on the Residential and Subdivision Chapters of the Proposed Christchurch Replacement District Plan:

- Submitter 2474 – A Pan & S Tsun Yu
- Submitter 2475 – RJ & CB Sissons
- Submitter 2476 – Bromac Lodge
- Submitter 2477 – Martin Harcourt
- Submitter 2478 – Mercantile Trust

(the Submitters)

2. I am in receipt of a Memorandum of Counsel on behalf of Fulton Hogan Land Development Limited (Submitter No 2097) dated 9 October 2015, in which FHL D advises the Panel as to the extent of its intended participation at the hearings on the Subdivision Chapter.

3. This Memorandum is filed for the same purpose.

4. The further submission by the Submitters related to the submissions by FHL D covering two of the three points identified in para 5 of the FHL D Memorandum, namely:

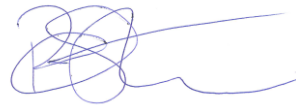
- (a) To retain the zoning as shown on planning maps 44 and 49. Rezoning of the area west of Knight Stream to the NZTA John Paterson Drive extension designation to residential medium density and residential suburban.
- (b) To replace the outline development plan (ODP) as notified with the ODP included as attachment 1 of the submissions

5. FHL D correctly notes that the Submitters have no interest in point (c) of para 5 of its Memorandum.

6. The Submitters do not intend to file any additional evidence to support their position on these two matters, and will rely on the same evidence provided by Graham Taylor at the Residential Chapter hearing, dated 27 August 2015.

7. Counsel is aware that the draft review of the LURP is presently before the Minister of Earthquake Recovery awaiting his approval. That does not recommend any changes to the Urban Boundary shown on Map 1 of the RPS. Instructions are being sought from the Submitters as to their role in future hearings of other submissions made to the Rural and Residential New Neighbourhood Zone provisions (where the Submitters sought a rezoning of their land).
8. Suffice to say, for the purpose of the Subdivision Chapter, Counsel intends to appear very briefly to present submissions for the Submitters in light of that recent development and its relevance for the purpose of the Submitters' position on changes sought to the ODP relating to FHLD's land.

Dated this 23rd day of October 2015.



P A Steven QC

Counsel for submitters named above