

**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 Natural and
Cultural Heritage Stage 3
Proposal

**MEMORANDUM ON BEHALF OF CHRISTCHURCH CITY COUNCIL REGARDING
CLOSING LEGAL SUBMISSIONS
FOR TOPIC 9.2 OUTSTANDING NATURAL FEATURES AND LANDSCAPES**

4 MARCH 2016

so ordered.
J. G. Fargher
7/3/16

 **Simpson Grierson**
Barristers & Solicitors

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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of Christchurch City Council (**Council**) in relation to the timing of closing legal submissions for Topic 9.2 Outstanding Natural Features and Landscapes (**the Topic**).
2. The Council notes that the hearing time scheduled for this Topic has been completed, and there is no further mediation scheduled.
3. Accordingly, while pursuant to the Panel's minute of 22 February 2016 there are still outstanding procedural steps in relation to other parts of Chapter 9 Natural and Cultural Heritage, there are no outstanding procedural steps for this Topic.
4. In light of this, the Council considers the most efficient and appropriate approach to closing legal submissions for Chapter 9 would be for separate closing legal submissions to be provided for each topic in the Chapter. The Council respectfully requests that the Panel issue directions as follows:
 - (a) the Council is to lodge its final revised proposal for this Topic by **5pm Friday 11 March 2016**;
 - (b) submitters are to lodge their closing legal submissions for this Topic by **5pm Friday 18 March 2016**; and
 - (c) the Council is to lodge its closing legal submissions for this Topic by 5pm Thursday 24 March 2016.

Dated at Christchurch this 4th day of March 2016



M G Conway / M J Jagusch / Z W Fargher
Counsel on behalf of Christchurch City
Council