

**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 proposed  
Christchurch  
Replacement District  
Plan

---

**MEMORANDUM OF COUNSEL ON BEHALF OF CHRISTCHURCH CITY COUNCIL  
REGARDING HEARING DATE FOR THE SPECIFIC PURPOSE (FLAT LAND  
RECOVERY) ZONE**

**27 OCTOBER 2015**

---

---

 **Simpson Grierson**  
Barristers & Solicitors

Simpson Grierson  
J G A Winchester / S J Scott  
Telephone: +64-3-968 4018  
Facsimile: +64-3-379 5023  
Email: sarah.scott@simpsongrierson.com  
PO Box 874  
SOLICITORS  
CHRISTCHURCH 8140

**MAY IT PLEASE THE PANEL:**

1. This memorandum of counsel is filed on behalf of the Christchurch City Council (**Council**) in response to the memorandum of counsel for the Crown, dated 23 October 2015.
2. That memorandum, among other things, requests that the hearing for the Specific Purpose (Flat Land Recovery) Zone proposed to be scheduled in December 2015 not be set down for a hearing until March 2016.
3. The Council has considered the reasons for the request set out in the Crown's memorandum, and confirms that it accepts those reasons and agrees with the Crown's request for a March 2016 hearing date for the Specific Purpose (Flat Land Recovery) Zone.
4. Council respectfully requests that the Crown's request for a hearing in March be considered at Wednesday's pre-hearing meeting on the Stage 3 Specific Purpose zones.

**DATED** this 27<sup>th</sup> day of October 2015



---

S J Scott / T Fischer  
Counsel for Christchurch City Council