

**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 Stage 3 of the Christchurch Replacement District Plan

**CLOSING SUBMISSIONS FOR THE CROWN ON THE SPECIFIC PURPOSE
(BURWOOD LANDFILL AND RESOURCE RECOVERY PARK) ZONE
PROPOSAL 21.12**

Dated: 16 December 2015

BUDDLE FINDLAY

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1. INTRODUCTION

- 1.1 Following the hearing of Proposal 21.12 on 9 December 2015, Ms Rolton, Ms Yozin and Mr Murray were directed to file an updated redline version of the proposal ("**updated redline version**").
- 1.2 The updated redline version filed by Ms Rolton, Ms Yozin and Mr Murray on 10 December 2015 reflects the planners' resolution of the matters that were raised during the course of the hearing.

2. UPDATED REDLINE VERSION

- 2.1 The Crown submits that the updated redline version, in respect of the relief the Crown sought for Proposal 21.12:
- (a) is consistent with the Statement of Expectations included in Schedule 4 to the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014;¹
 - (b) implements Objectives 3.3.1, 3.3.2, 3.3.7 and 3.3.9 of the decision of the Hearings Panel on strategic directions and strategic outcomes (and relevant definitions) dated 26 February 2015;²
 - (c) gives effect to the Canterbury Regional Policy Statement 2013;³
 - (d) is consistent with the Recovery Strategy Mahere Haumanutanga o Waitaha⁴ and the Land Use Recovery Plan - Te Mahere Whakahaumanu Tāone, particularly outcomes 3, 4, 5 and 9, and action 2(iv),⁵ and
 - (e) achieves the purpose of the RMA by enabling development in a manner that enables people and communities to provide for their social, economic and cultural wellbeing and safety while appropriately avoiding, remedying or mitigating adverse effects. In particular, it will assist in the rehabilitation and rebuilding of greater Christchurch, contributing to the social, economic and health and safety benefits

¹ In particular, clauses (a), (b), (c) and (f) for the reasons summarised in paragraph 7.4(c) of Ms Yozin's evidence in chief.

² See further paragraph 7.4(b)-(e) of Ms Yozin's evidence in chief.

³ In particular, the objectives and policies listed in paragraph 6.3 of Ms Rolton's evidence in chief. The Crown submits that Objectives 6.2.3 and 19.2.2, and Policies 6.3.2, 19.3.1 and 19.3.4 are particularly relevant, for the reasons given in paragraph 7.4(g) of Ms Yozin's evidence in chief.

⁴ In particular, Goals 1.1, 1.5 and 6.6 for the reasons given in paragraph 6.6 of Ms Rolton's evidence in chief, and paragraph 7.4(h)(i) of Ms Yozin's evidence in chief.

⁵ See further paragraph 7.4(h)(ii) of Ms Yozin's evidence in chief and paragraph 6.7 of Ms Rolton's evidence in chief.

associated with a timely and efficient rebuild and recovery. The Burwood Resource Recovery Park allows for the sorting and recycling of earthquake waste, promoting sustainable management by reducing the total volume of waste being sent to landfill for disposal.⁶

DATED 16 December 2015



David Allen / Julia White
Counsel for the Crown

⁶ Evidence in chief of Ms Yozin, paragraph 7.4(a).