

**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 Chapter 21 (Stage 3)
Specific Purpose Zones
(Flat Land Recovery,
Ruapuna, Burwood
Landfill and Resource
Recovery Park)
Proposal of the
proposed Christchurch
Replacement District
Plan

**MEMORANDUM OF COUNSEL IN RELATION TO CONCURRENT ENVIRONMENT
COURT PROCEEDINGS REGARDING THE RUAPUNA MOTOR SPORT PARK**

20 NOVEMBER 2015

 **Simpson Grierson**
Barristers & Solicitors

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MAY IT PLEASE THE PANEL:

1. In its Pre-Hearing Report and Directions, the Panel directed the Council to provide a memorandum by 20 November 2015 updating the Panel on the concurrent Environment Court proceedings concerning the Ruapuna Motor Sport Park.
2. The Environment Court proceedings have not yet concluded. The Court issued a minute yesterday seeking clarification of several matters by way of memoranda which will be exchanged throughout December. If there are unresolved matters after the exchange of memoranda which require further evidence, a further hearing will be held in the week beginning 11 January 2016. Following resolution of the outstanding matters, a section 293 consultation process will take place before the Court will issue its final decision.
3. Given the further steps required before the Environment Court proceedings are resolved and the parties have certainty about the final form and content of the plan provisions, the Council respectfully requests the directions set out in the Pre-Hearing Report and Directions remain suspended with the Council to provide a further update on progress with the Environment Court proceedings by 22 January 2016. The Council would provide an update earlier if further clarity about the Environment Court process becomes available before 22 January 2016.

DATED 20 November 2015

A handwritten signature in blue ink, appearing to read 'M G Conway / H P Harwood', is written over a light blue rectangular background.

M G Conway / H P Harwood
Counsel for Christchurch City Council