

**BEFORE INDEPENDENT HEARING COMMISSIONERS
APPOINTED BY THE CANTERBURY REGIONAL COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER of Proposed Plan Change 7 to the Canterbury Land and
Water Regional Plan and Proposed Plan Change 2 to the
Waimakariri River Regional Plan

**MEMORANDUM OF COUNSEL ON BEHALF OF THE CANTERBURY
REGIONAL COUNCIL
5 March 2021**

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MAY IT PLEASE THE HEARING COMMISSIONERS

- 1 At the Reply Hearing on 26 February 2021, the Hearing Commissioners agreed to allow the Council Officers further time to provide a completed response to the following question:

Can the officers please provide wording for amendments to Policy 14.4.28 and Table 14(zc) to enable the Panel to better consider this option?
- 2 A written response to this question was provided in the set of answers dated 24 February 2021. Council Officers suggested that a further Schedule could be introduced listing the legal descriptions of the 15 shareholder properties identified as being in the Rangitata Orton High Nitrogen Concentration Area and captured by a new policy, Policy 14.4.19A.
- 3 At the time of providing this response, Council Officers noted that Rangitata South Irrigation Limited (**RSIL**) had not provided a list of the 15 shareholder properties in its evidence, and as the Council did not have that information, the answer simply noted that those legal descriptions could be included in a Schedule.
- 4 Following consideration of the Council's written response to this question, Counsel for RSIL approached counsel for the Council during the Reply Hearing and offered to provide this list in order to complete the answer.
- 5 Counsel for RSIL subsequently provided a list of shareholder properties to counsel for the Council. However, the list includes the 15 shareholder properties referred to in RSIL's evidence, along with a further 7 shareholder properties. This addition significantly increases the area originally contemplated by Council Officers.
- 6 Counsel understands that RSIL was not willing to split this shareholder group further into the 15 shareholder properties mentioned in its evidence.

- 7 Accordingly, the Council is unable to identify the list of 15 shareholder properties that Council Officers anticipated would be captured by Policy 14.4.19A. The list of 22 shareholder properties provided by RSIL is enclosed as **Appendix 1**.

Dated this 5th day of March 2021



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P A C Maw / I F Edwards
Counsel for the Canterbury Regional Council

Appendix 1 – List of 22 shareholder properties provided by RSIL

- Crown Land (under action) Survey Office Plan 1001
- Crown Land (under action) Survey Office Plan 11117
- Crown Land (under action) Survey Office Plan 3110
- Crown Land (under action) Survey Office Plan 3114
- Crown Land (under action) Survey Office Plan 3146
- Crown Land (under action) Survey Office Plan 3197
- Crown Land (under action) Survey Office Plan 4683
- Lot 1 DP 10768
- Lot 1 DP 13504
- Lot 1 DP 13552
- Lot 1 DP 17528
- Lot 1 DP 17971
- Lot 1 DP 19044
- Lot 1 DP 19835
- Lot 1 DP 22969
- Lot 1 DP 24316
- Lot 1 DP 26674
- Lot 1 DP 28760
- Lot 1 DP 306673
- Lot 1 DP 36662
- Lot 1 DP 367805
- Lot 1 DP 371537
- Lot 1 DP 37397
- Lot 1 DP 382685
- Lot 1 DP 393127
- Lot 1 DP 404162
- Lot 1 DP 409140
- Lot 1 DP 430636
- Lot 1 DP 434779
- Lot 1 DP 437037
- Lot 1 DP 4450
- Lot 1 DP 459906
- Lot 1 DP 473760
- Lot 1 DP 47942
- Lot 1 DP 488378
- Lot 1 DP 48844
- Lot 1 DP 49941
- Lot 1 DP 55285
- Lot 1 DP 5660
- Lot 1 DP 59229
- Lot 1 DP 59561
- Lot 1 DP 62376
- Lot 1 DP 6346
- Lot 1 DP 68494
- Lot 1 DP 70964

- Lot 1 DP 72837
- Lot 1 DP 73087
- Lot 1 DP 73873
- Lot 1 DP 74975
- Lot 10 DP 453445
- Lot 11 DP 1204
- Lot 12 DP 1204
- Lot 2 DP 1204
- Lot 2 DP 13504
- Lot 2 DP 13552
- Lot 2 DP 17306
- Lot 2 DP 17528
- Lot 2 DP 26674
- Lot 2 DP 28760
- Lot 2 DP 306673
- Lot 2 DP 367805
- Lot 2 DP 371537
- Lot 2 DP 382685
- Lot 2 DP 393127
- Lot 2 DP 404162
- Lot 2 DP 408128
- Lot 2 DP 409140
- Lot 2 DP 430636
- Lot 2 DP 434779
- Lot 2 DP 437037
- Lot 2 DP 459906
- Lot 2 DP 473760
- Lot 2 DP 478238
- Lot 2 DP 49941
- Lot 2 DP 5660
- Lot 2 DP 59229
- Lot 2 DP 6346
- Lot 2 DP 70964
- Lot 2 DP 72837
- Lot 22 DP 330
- Lot 24 DP 330
- Lot 3 DP 1204
- Lot 3 DP 15649
- Lot 3 DP 17528
- Lot 3 DP 19835
- Lot 3 DP 306673
- Lot 3 DP 367805
- Lot 3 DP 437037
- Lot 3 DP 453445
- Lot 3 DP 459906
- Lot 3 DP 473760

- Lot 3 DP 47942
- Lot 3 DP 72837
- Lot 4 DP 15649
- Lot 4 DP 17528
- Lot 4 DP 306673
- Lot 4 DP 367805
- Lot 4 DP 453445
- Lot 4 DP 473760
- Lot 4 DP 47942
- Lot 5 DP 306673
- Lot 5 DP 367805
- Lot 5 DP 469632
- Lot 5 DP 47942
- Lot 5A DP 5116
- Lot 5B DP 5116
- Lot 6 DP 306673
- Lot 6 DP 367805
- Lot 6 DP 453445
- Lot 6 DP 473760
- Lot 6 DP 47942
- Lot 7 DP 306673
- Lot 7 DP 453445
- Lot 7 DP 473760
- Lot 7 DP 47942
- Part Lot 2 DP 19835
- Part Lot 2 DP 6362
- Part RES 100
- Part RES 1486
- Part RES 1650
- Part Res 2141 SO 2498
- Part RES 2444
- Part RS 15991
- Part RS 18813
- Part RS 19987
- Part RS 20397
- Part RS 20701
- Part RS 20702
- Part RS 20862
- Part RS 21258
- Part RS 21572
- Part RS 21573
- Part RS 21574
- Part RS 21577
- Part RS 22195
- Part RS 22221
- Part RS 22296

- Part RS 22482
- Part RS 22497
- Part RS 22631
- Part RS 22780
- Part RS 23972
- Part RS 23973
- Part RS 24041
- Part RS 24043
- Part RS 24081
- Part RS 24166
- Part RS 24436
- Part RS 25866
- Part RS 27712
- Part RS 30049
- Part RS 30645
- Part RS 30726
- Part RS 31267
- Part Section 25 RES 1650
- Part Section 27 RES 1650
- Part Section 38 RES 1381
- Part Section 52 RES 1371
- Part Section 54 RES 1371
- RES 1058
- RES 176
- RES 1841
- RES 2159
- RES 2161
- RES 2750
- RES 2751
- RES 2853
- RES 2883
- RES 2884
- RES 2885
- RES 2886
- RES 2887
- RES 2888
- RES 2889
- RES 2890
- RES 2891
- RES 2892
- RES 2893
- RES 2894
- RES 2895
- RES 2896
- RES 2898
- RES 2899

- RES 2900
- RES 2901
- RES 4410
- RES 4412
- RES 5266
- RES 785
- RS 12188
- RS 14964
- RS 15475
- RS 15545
- RS 15919
- RS 15935
- RS 15936
- RS 15937
- RS 16760
- RS 16879
- RS 16932
- RS 17883
- RS 18812
- RS 18812X
- RS 19110
- RS 19379
- RS 19583
- RS 19635
- RS 19899
- RS 19986
- RS 19992
- RS 20072
- RS 20127
- RS 20203
- RS 20204
- RS 20272
- RS 20398
- RS 20475
- RS 20699
- RS 20700
- RS 20704
- RS 20705
- RS 20706
- RS 21093
- RS 21094
- RS 21208,21209
- RS 21304
- RS 21468
- RS 21578
- RS 21631

- RS 21632
- RS 21940
- RS 21954
- RS 22005
- RS 22217
- RS 22236
- RS 22378
- RS 22475
- RS 22479
- RS 22632
- RS 23072
- RS 23133
- RS 23331
- RS 23353
- RS 23597
- RS 23600
- RS 23691
- RS 23767
- RS 23927
- RS 23949
- RS 23969
- RS 24025
- RS 24040
- RS 24082
- RS 24083
- RS 24112
- RS 24163
- RS 24167
- RS 24437
- RS 24675
- RS 24747
- RS 24792
- RS 24793
- RS 24794
- RS 24826
- RS 24906
- RS 24919
- RS 25170
- RS 25171
- RS 25189
- RS 25197
- RS 25198
- RS 25310
- RS 25377
- RS 25578
- RS 25579

- RS 25777
- RS 25855
- RS 25865
- RS 25900
- RS 25923
- RS 25953
- RS 25954
- RS 25999
- RS 26007
- RS 26023
- RS 26272
- RS 26449
- RS 26691
- RS 26692
- RS 26693
- RS 26696
- RS 27149
- RS 27344
- RS 27757
- RS 27780
- RS 27785
- RS 27894
- RS 28040
- RS 28075
- RS 28212
- RS 28371
- RS 28456
- RS 28510
- RS 28658
- RS 28747
- RS 28911
- RS 28988
- RS 29022
- RS 29160
- RS 29278
- RS 29311
- RS 29312
- RS 29313
- RS 29314
- RS 29594
- RS 29706
- RS 29936
- RS 30048
- RS 30108
- RS 30795
- RS 30894

- RS 31382
- RS 31383
- RS 31971
- RS 31974
- RS 32323
- RS 32331
- RS 32421
- RS 32547
- RS 32782
- RS 32814
- RS 33062
- RS 34507
- RS 35921
- RS 35922
- RS 35931
- RS 35932
- RS 36066
- RS 36156
- RS 36196
- RS 36198
- RS 36371
- RS 36511
- RS 36557
- RS 36599
- RS 36613
- RS 38154
- RS 38155
- RS 38198
- RS 38204
- RS 38610
- RS 38894
- RS 38895
- RS 39602
- RS 39603
- RS 39909
- RS 39910
- RS 40534
- RS 41095
- RS 41774
- RS 4869
- Section 1 Block XII TN OF Rangitata
- Section 1 RES 953
- Section 1 SO 417992
- Section 1 SO 473556
- Section 1 SO 8785
- Section 10 Block XII TN OF Rangitata

- Section 10 RES 1650
- Section 10 RES 2645
- Section 11 Block XII TN OF Rangitata
- Section 11 RES 2645
- Section 12 Block XII TN OF Rangitata
- Section 12 Block XIII TN OF Rangitata
- Section 12 RES 2645
- Section 13 Block XII TN OF Rangitata
- Section 13 Block XIII TN OF Rangitata
- Section 14 Block XII TN OF Rangitata
- Section 14 Block XIII TN OF Rangitata
- Section 15 Block XII TN OF Rangitata
- Section 15 Block XIII TN OF Rangitata
- Section 16 Block XIII TN OF Rangitata
- Section 16 RES 2645
- Section 17 RES 1381
- Section 17 RES 2645
- Section 18 Block XIII TN OF Rangitata
- Section 18 RES 1381
- Section 19 Block XIII TN OF Rangitata
- Section 19 RES 1381
- Section 2 Block XII TN OF Rangitata
- Section 2 SO 19500
- Section 20 Block XIII TN OF Rangitata
- Section 20 RES 1381
- Section 21 Block XIII TN OF Rangitata
- Section 21 RES 2645
- Section 22 Block XIII TN OF Rangitata
- Section 23 RES 1650
- Section 24 RES 1650
- Section 27 Block XIII TN OF Rangitata
- Section 27 RES 1371
- Section 28 Block XIII TN OF Rangitata
- Section 28 RES 1371
- Section 29 Block XIII TN OF Rangitata
- Section 3 Block XII TN OF Rangitata
- Section 3 RES 953
- Section 3 SO 19500
- Section 3 SO 444577
- Section 30 Block XIII TN OF Rangitata
- Section 30 RES 1371
- Section 31 Block XIII TN OF Rangitata
- Section 31 RES 1371
- Section 32 Block XIII TN OF Rangitata
- Section 32 RES 1371
- Section 33 Block XIII TN OF Rangitata

- Section 33 RES 1371
- Section 34 RES 1371
- Section 34 RES 1381
- Section 35 RES 1371
- Section 35 RES 1381
- Section 36 RES 1371
- Section 36 RES 1381
- Section 37 RES 1381
- Section 38 RES 1371
- Section 4 Block XII TN OF Rangitata
- Section 4 SO 444577
- Section 47 RES 1371
- Section 49 RES 1371
- Section 5 Block XII TN OF Rangitata
- Section 5 RES 349
- Section 51 RES 1371
- Section 53 RES 1371
- Section 53 RES 1381
- Section 6 Block XII TN OF Rangitata
- Section 6 RES 349
- Section 62 RES 1371
- Section 64 RES 1650
- Section 65 RES 1650
- Section 7 Block XII TN OF Rangitata
- Section 7 RES 349
- Section 8 Block XII TN OF Rangitata
- Section 9 Block XII TN OF Rangitata
- Trig Reserve Survey Office Plan 2188
- Trig Reserve Survey Office Plan 2319