

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT SELWYN**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
HEREWINI**

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF the hearing of submissions on the
Proposed Selwyn District Plan

**MEMORANDUM OF COUNSEL ON BEHALF
OF KĀINGA ORA—HOMES AND COMMUNITIES**

Hearing 1— Strategic Directions

3 September 2021

GREENWOOD ROCHE
LAWYERS
CHRISTCHURCH
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MAY IT PLEASE THE PANEL

- 1 Kāinga Ora—Homes and Communities (Kāinga Ora) is a submitter (DPR-0414) and further submitter on the proposed Selwyn District Plan (PDP).
- 2 In response to questions raised by the Panel during the Strategic Directions hearing, counsel for the Carter Group Companies (Submitters DPR-0358, DPR-0384, DPR-0374 and DPR-0363) filed a memorandum of counsel (*the memorandum*) setting out the timeline of planning events involved in Plan Change 1 (*Change 1*) to the Canterbury Regional Policy Statement (*CRPS*). The memorandum also addressed further points relating to the relationship between the CRPS and the National Policy Statement on Urban Development (*NPS-UD*) and a response to the legal submissions of Christchurch City Council (*CCC*) and Canterbury Regional Council (*Ecan*).
- 3 The Panel's minute of 25 August 2021 invited all parties who made legal submissions on the Strategic Directions chapter to provide further legal submissions addressing the matters raised in the memorandum on the basis that it advanced legal submissions that the Panel did not directly request.
- 4 Kāinga Ora does not wish to provide further detailed legal submissions but does wish to support the submissions for the Carter Group Companies insofar as they relate to:
 - (a) Whether Change 1 gives effect to the NPS-UD;
 - (b) Whether there is inconsistency between the CRPS and the NPS-UD; and
 - (c) How that inconsistency should be reconciled.
- 5 Kāinga Ora agrees with the submissions made and conclusions reached in all three areas set out above.

- 6 Kāinga Ora further supports the submissions made in the section of the memorandum headed "*Response to the Legal Submissions of CCC and Ecan for Topic 1: Strategic Directions*".
- 7 Kāinga Ora is grateful for the Panel's consideration of this matter.

DATED this 3rd day of September 2021

L J Semple

Counsel for Kāinga Ora—Homes and Communities