

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
IN CHRISTCHURCH**

**TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions on Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan

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**MEMORANDUM OF COUNSEL FOR CHRISTCHURCH CITY COUNCIL  
FILING REBUTTAL EVIDENCE OF IKE KLEYNBOS**

16 October 2023

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**BUDDLE FINDLAY**

Barristers and Solicitors  
Wellington

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**MAY IT PLEASE THE COURT:**

1. Filed together with this memorandum of counsel for Christchurch City Council (**Council**) is the rebuttal evidence of Mr Ike Kleynbos.
2. Counsel's memoranda of 3 and 9 October 2023 foreshadowed that Mr Kleynbos' rebuttal evidence could not be filed by the due date of 9 October 2023, due to illness.
3. Counsel respectfully ask that the Panel waive the timeframe in these circumstances. No party is likely to be prejudiced by such a waiver because:
  - (a) Mr Kleynbos' evidence relates to the residential topic, the hearing in respect of which is not due to commence until 31 October 2023;
  - (b) there is no opportunity or need for parties to respond to Mr Kleynbos' evidence prior to the hearing; and
  - (c) Mr Kleynbos' evidence serves to identify key planning matters at issue in respect of the residential topic, so assists in an efficient hearing process.

**DATED** this 16<sup>th</sup> day of October 2023



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**D G Randal / C O Carranceja**

Counsel for Christchurch City Council