

**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

**MEMORANDUM OF COUNSEL FOR CHRISTCHURCH CITY COUNCIL
REGARDING LATE FURTHER SUBMISSION OF MR DAVID LAWRY**

4 December 2023

BUDDLE FINDLAY

Barristers and Solicitors
Wellington

Solicitors Acting: **Dave Randal / Cedric Carranceja**
Email: david.randal@buddlefindlay.com / cedric.carranceja@buddlefindlay.com
Tel 64 4 462 0450 / 64 3 371 3532
Fax 64 4 499 4141 PO Box 2694 DX SP20201 Wellington 6011

MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:

1. This memorandum of counsel for Christchurch City Council (**Council**) is in response to Minute 27 of the Independent Hearings Panel (**IHP**) (**Minute**) regarding an application by Mr David Lawry for leave for a late further submission to be received.
2. Paragraph 8(b) of the Minute directs the Council to advise the IHP if there are any matters of prejudice arising from the receipt of Mr Lawry's late further submission.
3. The Council takes a neutral position in respect of Mr Lawry's application for leave. The Council raises no specific matters of prejudice and will abide by the IHP's decision.

Date: 4 December 2023

 

D G Randal / C O Carranceja
Counsel for Christchurch City Council