

**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
SEEKING LEAVE TO CROSS-EXAMINE WITNESS SCHEDULED FOR 16
NOVEMBER 2023**

10 November 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**) seeks leave to cross-examine Mr Jonathan Clease, planner for LMM Investments 2012 Limited (submitter #826 and further submitter #2049), scheduled (as at 10 November 2023) to appear on Thursday 16 November 2023 in relation to Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan (**PC14**).
2. Mr Clease was previously signalled as appearing on Tuesday 28 November 2023 (in the hearing schedule as at 20 October 2023)
3. Counsel respectfully seek leave to cross-examine Mr Clease on the proposed application of MDRS provisions to the relevant site.
4. The parts of expert evidence identified for questioning relate to contentious issues between Mr Clease and Council experts. By focussing questioning on these issues, counsel's intent is that cross-examination would assist the Panel to understand the outstanding issues between experts, their matters of difference, and whether any differences could be resolved. To that end, leave is sought to undertake focussed cross-examination of up to 10 minutes.

Date: 10 November 2023



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