

**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 RE:
MINUTE 5 (SUPPLEMENTARY SECTION 42A REPORTS); AND
MINUTE 9 (RESPONSE TO PRELIMINARY MATTERS)**

15 September 2023

BUDDLE FINDLAY

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:

1. This memorandum of counsel for Christchurch City Council (**Council**) addresses matters raised in:
 - (a) 'Minute 5: Response to memorandum of counsel for Christchurch City Council 18 August 2023 – errors in summary of submissions', dated 23 August 2023; and
 - (b) 'Minute 9: Response to preliminary matters raised by Mr David Townshend (submitter #599), dated 11 September 2023.

MINUTE 5

2. By memorandum of counsel dated 18 August 2023, the Council informed the Panel that the summary of submissions published on the Panel's website on 18 August 2023 contained errors which were corrected and re-published on 23 August 2023. The errors related to the submissions of:
 - (a) Teewah Holdings Limited (submission #2108);
 - (b) Tobias Meyer (submission #55); and
 - (c) Wigram Lodge (2001) Limited, Elizabeth Harris, and John Harris (submission #817).
3. At paragraph [13] of Minute 5 the Panel requested that the Council file a supplementary section 42A report addressing the above additional submissions (and further submissions on them, if any) by 15 September 2023.
4. In accordance with the Panel's direction, accompanying this memorandum are supplementary evidence / section 42A reports addressing the above submissions and relevant further submissions prepared by the following section 42A authors:
 - (a) Mr Ike Klenybos (accompanied by Appendix 1, discussed below); and
 - (b) Ms Holly Gardiner.
5. Counsel confirm that the above evidence / reports will be served on the submitters referred to above (and the relevant further submitters).

MINUTE 9

6. At paragraph [10] of Minute 9 the Panel directed Mr Ike Kleynbos of the Council to:

"extract a list of all submissions and further submissions summaries on the sunlight access qualifying matter and identify these by submitter name and submission point number and group them into those supportive of the sunlight access qualifying matter, those opposed to it and those seeking an alternative outcome."

7. The Panel directed that this be provided to the Panel by way of an addendum to Mr Kleynbos' Section 42A report by Monday, 18 September 2023.
8. For efficiency, Mr Ike Kleynbos has appended the above list (in table form) to his supplementary evidence / report as Appendix 1 which accompanies this memorandum.

Date: 15 September 2023



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

Appendix 1 – Ike Klenybos supplementary section 42A report

Appendix 2 – Holly Gardiner supplementary section 42A report