

**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 IN
RESPONSE TO MINUTE 13 OF THE PANEL**

28 September 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**) responds to minute 13 of the Panel, seeking comment on:
 - (a) an application for a waiver by a submitter, Miles Premises Limited (submitter #883), to file evidence late; and
 - (b) a potential conflict or perceived conflict issue signalled by the Chair of the Panel.
2. The Council takes a neutral position in respect of both matters.
3. In respect of the late evidence, it is difficult to comment on the potential degree of prejudice to the Council and other submitters of the lateness without seeing the evidence. That being the case, if the Panel is minded to grant the waiver, the Council asks that the Panel make directions affording other parties sufficient time to respond (if necessary) to the evidence.

Date: 28 September 2023



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