

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

Proposed Plan Change 14 Housing and Business  
Choice pursuant to Part 5, subpart 5A and Part 6 of  
Schedule 1 of the Resource Management Act 1991

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**MEMORANDUM OF COUNSEL FOR THE CHRISTCHURCH CITY COUNCIL**

**5 MAY 2023**

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**Christchurch City Council**

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**MAY IT PLEASE THE PANEL:**

1. This memorandum of counsel for the Christchurch City Council (Council) provides an update to the Independent Hearings Panel (IHP) on the submission process.
2. This update is for the information of the IHP. This memorandum does not seek any change to the preliminary directions or timeline set out in the IHP's Minute 1 dated 31 March 2023.
3. Plan Change 14 (PC14) was publicly notified on 17 March 2023 and stated that submissions would close on 3 May 2023.
4. The Public Notice published in the Press and the Star specified a number of methods for making a submission, including:
  - (a) Online at [ccc.govt.nz/haveyoursay](https://ccc.govt.nz/haveyoursay);
  - (b) by sending a written submission to a freepost address.
5. On 27 April 2023 Council officers became aware of technical issues with the Council's online submission forms on its webpages for plan change 14. Council investigations of these issues reveal that the earliest the issues arose was on 21 April 2023 following some changes that Council made to the software behind the submission form. All issues were resolved by Wednesday 4 May 2023. The issues, and their resolutions, were:
  - (a) Some submitters advised that the form was requiring them to upload a file to the submission form, even if they had no file to upload. This has been fixed.
  - (b) A "time-out" of the form when the submitter was drafting the submission was resulting in the loss of information if someone does not maintain activity on their computer. This is a feature of a web-based app. The Council has added a note to the page as copied

below:

### Have your say

#### Submission sessions time out after 45 minutes

Our feedback form works best if you're using Google Chrome. If you are using a different browser and you think you will need a little longer than this to make your submission, we advise cutting and pasting from a word document, to avoid losing any information.

If you have any questions, please contact the Engagement Advisor.

- (c) Insufficient space in the embedded submission form on the PC14 webpages did not give submitters visibility of all parts of their submission or, in some cases, visibility of the button to submit. The box that contains the content of a submission has been increased in size to enable more text to be visible. A button has also been added to “Save feedback” at any time and the submission form is now split by tabs to clearly indicate how someone submits their feedback.
  - (d) An issue was identified after someone has clicked the submit button. A prompt would appear to state “Are you sure you want to submit. Once submitted it can no longer be edited”, which was not always visible without scrolling down the page. This has been addressed with the change to the form that is now split into tabs.
6. The Council has decided to exercise its powers pursuant to section 37 of the Resource Management Act 1991 to extend the submission period to 12 May 2023. This will mitigate the potential for these issues to have inadvertently caused inconvenience and/or delay for prospective submitters lodging submissions (whether by using the Council's online form following the resolution of technical issues, or by other means).
  7. In order to ensure that people are aware of that extended submission period, the Council has:
    - 7.1 Updated all of its webpages to show the extended date for submissions;
    - 7.2 Informed all people and organisations on the Council's District Plan stakeholder list, the Resource Consents e-newsletter and District Plan e-newsletter (approximately 2,000 people or organisations). These are people such as key stakeholders, interested persons who provided

feedback on the draft plan changes in March and April 2022, and those that previously attended webinars on the plan changes; and

- 7.3 Arranged a public notice to be run in the Press on Saturday 5 May stating that the closing date for submissions has been extended to 12 May 2023.
8. Council officers intend to ensure that this extension of time for submissions has no impact on the timing of the Council notifying a summary of submissions and inviting further submissions. It has no impact on the preliminary timeline in the IHP's Minute 1.

**DATED** 5 May 2023

A handwritten signature in blue ink, appearing to read 'BK Pizzev', with a stylized flourish at the end.

BK Pizzev  
Counsel for the Christchurch City Council