

Before an Independent Hearings Panel
appointed by Christchurch City Council

under: the Resource Management Act 1991

in the matter of: the hearing of submissions on Plan Change 14 (Housing
and Business Choice) to the Christchurch District Plan

and: **Christchurch International Airport Limited**
Submitter 852

Memorandum of Counsel in relation to IHP Minute 13

Dated: 28 September 2023

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

1 This memorandum of counsel is filed on behalf of Christchurch International Airport Limited (*CIAL*) (#852) in response to the IHP's Minute 13 and the memorandum of counsel on behalf of Miles Premises Limited seeking a waiver for the late filing of evidence.

Request for waiver to file late evidence

2 *CIAL* has concerns that the waiver sought may result in prejudice to the ability of its economics and housing capacity experts to properly consider the evidence of Mr Blackburn and Mr Mann. Assuming the evidence is received today, this leaves little time for *CIAL*'s experts to review the evidence and identify if there are any matters addressed which would require rebuttal evidence, then for instructions to be obtained and a rebuttal application prepared.

3 Given Miles Premises Limited has indicated that the evidence would likely be heard in the "Residential" topic, and given the small number of parties involved, counsel respectfully suggest a short extension as follows:

3.1 6 October 2023 – applications for rebuttal in respect of Mr Blackburn's and Mr Mann's evidence due at 12pm;

3.2 10 October 2023 – applications determined by 5pm; and

3.3 13 October 2023 – rebuttal evidence in respect of Mr Blackburn's and Mr Mann's evidence due at 12pm.

4 *CIAL* considers the above short extension would allow sufficient time for *CIAL*'s (and other's) experts to properly consider whether rebuttal evidence is required, which would assist the overall efficiency of the IHP's process.

5 On the basis of the above (or similar) proposed extension, *CIAL* would not object to the waiver sought.

Disclosure of potential conflict of interest

- 6 CIAL has no objection to the Chair's participation in the hearing of submission 883 and the associated further submissions.

Dated 28 September 2023

A handwritten signature in blue ink, appearing to read 'J Appleyard', is centered on the page.

J Appleyard / A Lee
Counsel for Christchurch International Airport
Limited