# BEFORE INDEPENDENT HEARING COMMISSIONERS AT CHRISTCHURCH

### I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE KI ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

**AND** 

IN THE MATTER of the hearing of submissions and further

submissions on Plan Change 14 to the

**Operative Christchurch District Plan** 

## MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND COMMUNITIES (SUBMITTER #834)

### **21 SEPTEMBER 2023**

Instructing solicitor:

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**Counsel instructed:** 

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#### MAY IT PLEASE THE COMMISSIONERS:

- This memorandum is filed by counsel for Kāinga Ora Homes and Communities ("Kāinga Ora") accompanying the evidence of Messrs Joll, Clease, Colegrave, Brown and Ms Strachan (the "Kāinga Ora witnesses") filed with the Independent Hearing Panel ("IHP") hearing submissions on Plan Change 14 ("PC14") to the Operative Christchurch District Plan ("Plan").
- 2. Evidence on noise-related matters on behalf of Kāinga Ora is being filed by Mr Whittington separately.
- 3. The purpose of this memorandum is to:
  - (a) seek leave to file a consolidated set of tracked provisions showing the amendments sought by the Kāinga Ora witnesses in their evidence by 5pm Friday 22 September 2023; and
  - (b) to note that corporate evidence on behalf of Kāinga Ora on PC14 will also be filed (early) by 5pm on Friday 22 September 2023.

Dated 21 September 2023

**Bal Matheson** 

Counsel for Kāinga Ora (in respect of non-noise related matters)