

UNDER

the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER

of Proposed Plan Change 14 to the Christchurch City
Plan ("**PC14**")

MEMORANDUM OF COUNSEL FOR SCENTRE (NEW ZEALAND) LTD

21 SEPTEMBER 2023

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McAugh**

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MAY IT PLEASE THE HEARING COMMISSIONERS

- 1.1 We refer to the Hearing Panel's Direction 6 of 23 August 2023, outlining the timetabling directions.
- 1.2 Scentre (New Zealand) Limited ("**Scentre**") filed evidence for Mr Vaughan Smith (planning) and Mr Justin Kean (corporate) with the IHP secretariat yesterday, prior to midday.
- 1.3 Scentre was not able to file the evidence of Dr Doug Fairgray (Economics) prior to the due date of 12pm 20 September 2023.
- 1.4 Scentre respectfully requests leave from the Panel to accept the late filing of the evidence of Dr Fairgray, which is filed with this memorandum, for the following reasons:
- (a) There is no prejudice to other parties by the late filing of this evidence as the evidence has been provided in advance of the expert witness conferencing on economics (to be attended by Dr Fairgray);
 - (b) Scentre has provided the other two statements of evidence it intends to rely on, prior to the 12pm due date; and
 - (c) The evidence of Dr Doug Fairgray has been provided only a short time (one day) after the due date.

DATED 21 September 2023



D J Minhinnick / S A Kilgour
Counsel for Scentre (New Zealand) Limited