

**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 (RMA)

AND

IN THE MATTER of of the hearing of submissions on Plan Change 14
(Housing and Business Choice) to the Christchurch
District Plan

MEMORANDUM OF COUNSEL ON BEHALF OF CAMBRIDGE 137 LIMITED
28 July 2023

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:

- 1 This memorandum is filed on behalf of Cambridge 137 Limited (submission number 1092) in response to the Pre-hearing Meeting Agenda dated 10 July 2023 encouraging submitters to file memoranda with the Independent Hearing Panel (**IHP**) in advance of the pre-hearing conference on specified procedural matters.
- 2 In addition, the IHP advised it would assist if submitters provided the information in relation to who will represent them at the hearing (lawyer, or individual in person, or expert witness) and indicate, where known, the number of witnesses they are likely to call, the names of those witnesses and their role/expertise.

Witnesses

- 3 Wynn Williams will represent Cambridge 137 Limited.
- 4 The following expert witnesses will provide expert evidence for Cambridge 137 Limited at the hearing:
 - (a) Corporate (non expert evidence, to be confirmed);
 - (b) Heritage Expert (expert to be confirmed);
 - (c) Brett Gilmore – Engineering;
 - (d) Hayden Doody – Property Valuation;
 - (e) Quantity Surveyor (expert to be confirmed); and
 - (f) Matt Bonis – Planning.

Other matters

- 5 In respect of the draft hearing schedule and procedures, Cambridge 137 Limited seeks clarification whether legal submissions are due on 9 October 2023¹ for all submitters, or 5 working days before the relevant hearing for the submitter.²
- 6 Cambridge 137 Limited also looks forward to the pre-hearing meeting and receiving further clarification from the Council in respect of the

¹ Minute 3 of the IHP dated 10 July, Appendix 2 – Indicative timeline indicates that all legal submissions are due on 9 October 2023.

² Minute 3 of the IHP dated 10 July, Appendix 3 – Draft Hearing Procedures at paragraph 88 indicates that legal submissions need to be provided 5 working days prior to the submitter's allocated speaking time at the relevant hearing.

interplay between the Plan Change 14 and Plan Change 13 processes, particularly given their interest in the heritage provisions which are common to both the Plan Change 14 and Plan Change 13 provisions and the different statutory processes that apply to each of the plan changes.

- 7 There are no other preliminary legal issues, comments on the draft hearing schedule or draft hearing procedures the Cambridge 137 Limited wishes to raise at this time.

Dated this 28th day of July 2022



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L F de Latour
Counsel for Cambridge 137 Limited