

Before the Independent Hearing Panel
Appointed by the Christchurch District 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

**Memorandum of Counsel on behalf of Cashmere Park Limited, Hartward
Investment Trust and Robert Brown (Submitter #593)**

28 July 2023

Submitter's solicitors:

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May it please the Hearing Panel:

- 1 This memorandum is filed on behalf of Cashmere Park Limited, Hartward Investment Trust and Robert Brown (the **Submitters**) responding to the directions to outline any preliminary legal issues, including scope, prior to the pre-hearing meeting on 1 August 2023.
- 2 The Submitters seeks to rezone land located near Hoon Hay, between Sparks Road and Cashmere Road,¹ from Residential New Neighbourhood and Rural Urban Fringe to Medium Density Residential.
- 3 The issue of whether the relief sought is within the scope of PC14 is addressed in the submission. However, should the Panel, Council or any other party consider that there is an issue as to scope, the Submitters respectfully suggest that this be dealt with by way of a preliminary hearing.

Dated this 28th day of July 2023



Sarah Eveleigh

Counsel for Cashmere Park Limited, Hartward Investment Trust and Robert Brown

¹ 126 Sparks Road (Lot 1 DP 412488); 17 Northaw Street (Lot 2 DP 412488); 36 Leistrella Road (Lot 3 DP 412488); 240 Cashmere Road (Lot 23 DP 3217); 236 Cashmere Road (RS 41613); 200 Cashmere Road (Lot 1 DP 547021)