

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: **Carter Group Limited**
Submitter 824

Catholic Diocese of Christchurch
Submitter 823

Church Property Trustees
Submitter 825

Daresbury Limited
Submitter 874

Memorandum of counsel seeking leave to cross-examine
Council witnesses – Other Zones and Historic Heritage
hearings

Dated: 16 November 2023

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

- 1 This memorandum of counsel is filed on behalf of the following submitters on proposed Plan Change 14 to the Christchurch District Plan (*PC14*) (together, the *Submitters*):
 - 1.1 Carter Group Limited (submitter #824) (*Carter Group*);
 - 1.2 Catholic Diocese of Christchurch (submitter #823) (*Catholic Diocese*);
 - 1.3 Church Property Trustees (submitter #825) (*CPT*); and
 - 1.4 Daresbury Limited (submitter #874) (*Daresbury*).
- 2 This memorandum seeks leave to cross-examine the Christchurch City Council (*Council*) witnesses as set out in the table at **Appendix 1** at the Other Zones and Historic Heritage hearings on 21, 23 and 28 November 2023.
- 3 The table at **Appendix 1** also indicates the aspects of the witnesses' section 42A reports or evidence that are proposed to be the subject of cross-examination.
- 4 We apologise for the late filing of this memorandum. This is, in some part, due to scheduling changes.
- 5 The purpose of cross-examination of these Council witnesses is to test and consider in greater detail the positions that they have taken in their reports and primary and rebuttal evidence in relation to certain key matters for the Submitters. The intent is to drill down into these issues to try and reach a more consistent position as between the Submitters and the Council, for the benefit of the Panel's decision-making. Cross-examination of any Council witnesses will take no longer than 10 minutes.
- 6 Counsel also consider it likely that the issues that are the subject of cross-examination may form a basis for subsequent conferencing in relation to the detail of certain PC14 provisions, in particular the application of the "heritage" qualifying matter.

Dated 16 November 2023



J Appleyard / A Hawkins / A Lee
Counsel for the Submitters

Appendix 1

Council witness	Relevant parts of section 42A report / evidence
Other Zones	
Clare Piper	Specific Purpose Zones
Amanda Mackay	Specific Purpose Zones
Nicola Williams	Specific Purpose Zones
Historic Heritage	
Suzanne Richmond	Evidence in relation to St James Church and Blue Cottage
Amanda Ohs	Evidence in relation to St James Church, Daresbury House and Blue Cottage
Ann McEwan	Evidence in relation to St James Church
Clara Caponi	Evidence in relation to St James Church and Blue Cottage
Stephen Hogg	Evidence in relation to Daresbury House
Tim Holmes	Evidence in relation to Blue Cottage
Chessa Stevens	Evidence in relation to St James Church
Gavin Stanley	Evidence in relation to Daresbury House and Blue Cottage
Philip Griffiths	Evidence in relation to St James Church