

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
AT CHRISTCHURCH**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE  
KI ŌTAUTAHI**

**IN THE MATTER  
AND**

**of the Resource Management Act 1991**

**IN THE MATTER**

**of the hearing of submissions and further  
submissions on Plan Change 14 to the  
Operative Christchurch District Plan**

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**MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND  
COMMUNITIES SEEKING LEAVE TO CROSS EXAMINE WITNESSES**

**9 APRIL 2024**

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**MAY IT PLEASE THE COMMISSIONERS:****1. LEAVE SOUGHT TO CROSS-EXAMINE**

1.1. Kāinga Ora seeks leave to cross-examine the following witnesses:

(a) Chris Day (for Christchurch International Airport Limited);

(b) John Kyle (for CIAL);

(c) Sarah Oliver (for Christchurch City Council).

1.2. The purpose of cross-examination is to put relevant differences between these witnesses, and witnesses for Kāinga Ora, to them, and to test the positions they have taken in relation to PC14. It is submitted that cross-examination of these witnesses will assist the Hearings Panel to better understand the respective positions for CIAL and Kāinga Ora, and the basis for Kāinga Ora's position in relation to the correct approach to qualifying matters under ss 77I-77L.

1.3. In accordance with the Panel's earlier minute, cross-examination would be limited to around 10 minutes. It is not expected that the more wide ranging cross-examination apparently anticipated by CIAL should be necessary.

Date: 9 April 2024



**Nick Whittington**  
**Counsel for Kāinga Ora-Homes and Communities**