

Before the Independent Hearing Panel  
Appointed by the Christchurch City Council

Under the Resource Management Act 1991

In the matter of Plan Change 14 (Housing and Business Choice) to the  
Christchurch District Plan

Miles Premises Limited (submitter 883)

Equus Trust (further submitter 2102)

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**Memorandum of Counsel seeking leave to cross examine**

12 April 2024

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**Submitter's solicitors:**

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**anderson  
lloyd.**

May it please the Independent Hearings Panel:

- 1 Counsel for Miles Premises Limited (**Miles**) and Equus Trust (**Equus**) seeks leave to cross-examine Mr Chris Day, witness for Christchurch International Airport Limited:
- 2 The purpose of cross-examination is to put to Mr Day the differences between his evidence and that of Prof. John-Paul Clarke (witness for Miles and Equus), including differences of opinion as identified in the joint witness statement of the airport noise experts, and to test the position he has taken in relation to PC14. It is submitted the cross-examination will assist the Hearings Panel to better understand the respective opinions of the CIAL and Miles/Equus witnesses, and the basis for the position of Miles/Equus in relation to the correct approach to the airport noise qualifying matters.
- 3 Cross-examination would be limited to 10 minutes. Cross-examination may be further reduced where issues have already been addressed through cross-examination by other counsel.



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Sarah Eveleigh

**Counsel for Miles Premises Limited and Equus Trust**

12 April 2024