

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

Memorandum of counsel seeking leave to cross-examine
Council witnesses – Qualifying Matters hearing

Dated: 4 April 2024

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

- 1 This memorandum of counsel is filed on behalf of Carter Group Limited (*Carter Group*), submitter #824 on proposed Plan Change 14 to the Christchurch District Plan (*PC14*).
- 2 This memorandum seeks leave to cross-examine the Christchurch City Council (*Council*) witnesses set out in the table at **Appendix 1** at the Qualifying Matters hearing on 16 and 18 April 2024.
- 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 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 Carter Group. The intent is to drill down into these issues to try and reach a more consistent position as between Carter Group 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 each.

Dated 4 April 2024



J Appleyard / A Hawkins
Counsel for Carter Group Limited

Appendix 1

Council witness	Relevant parts of section 42A report / evidence
Significant Trees	
Brittany Ratka	Response to Carter Group submission points
Tree Canopy and Financial Contributions	
Anita Hansbury	Response to Carter Group submission points