

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991 (RMA)

AND

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 CAMBRIDGE 137 LIMITED

15 March 2024

Cambridge 137 Limited's Solicitor
PO Box 4341 CHRISTCHURCH 8140
DX WX11179
Tel +64 3 379 7622
Fax +64 3 379 2467

WYNN WILLIAMS

Solicitor: L F de Latour
(lucy.delatour@wynnwilliams.co.nz)

MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:

- 1 This Memorandum is filed on behalf of Cambridge 137 Limited (submission number 1092).
- 2 The purpose of this Memorandum is to:
 - (a) respectfully offer that the Independent Hearings Panel (**Hearings Panel**) undertake a site visit of Harley Chambers as part of the hearing process to inform the Hearing Panel's recommendation on the relief sought by Cambridge 137 Limited; and
 - (b) requesting Cambridge 137 Limited's expert witness Mr Brett Gerrard be excused from presenting evidence at the hearings.

Purpose of the site visit

- 3 Counsel anticipate that a site visit would aid the Hearing Panel in their consideration of Cambridge 137 Limited's relief, as the site visit would:
 - (a) Provide the Hearing Panel with the opportunity to view the current state of Harley Chambers in person; and
 - (b) Enable the Hearing Panel to orientate and familiarise themselves with elements of the building referred to in evidence.
- 4 Whilst Cambridge 137 Limited is happy to facilitate a site visit if it would be of assistance to the Hearing Panel, it should be reiterated that the building is currently less than 15% NBS with multiple biological and physical hazards. Because of these hazards, the site visit would have to be conducted with a representative of the submitter and full PPE will be provided. The submitter accepts no liability or responsibility associated with the site visit.

Timing of the visit

- 5 If the Hearing Panel would be assisted by a site visit, representatives of Cambridge 137 Limited are available to provide access to the building during a time suitable to the Hearing Panel prior to the hearing. Cambridge 137 Limited will be presenting evidence during the week of the 15 April 2024 and the proposed timing for a site visit would be close to the time when the Hearing Panel will be considering evidence from Cambridge 137 Limited witnesses in respect of the Harley Chambers building.

- 6 Counsel can liaise directly with the Independent Hearing Panel Secretariat to arrange a suitable date, if that would assist.

Request to excuse expert witnesses from attending hearing

- 7 Evidence of Mr Gerrard was filed on behalf of Cambridge 137 Limited. Mr Gerrard's evidence is not contested by the evidence of Christchurch City Council. Unless there is a request to cross-examine Mr Gerrard, or the Hearings Panel has any questions in respect of Mr Gerrard's evidence, counsel respectfully request that Mr Gerrard's evidence is taken as read and he be excused from attending the hearing to present his evidence.

Dated this 15th day of March 2024



.....
L F de Latour
Counsel for Cambridge 137 Limited