

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

Memorandum of counsel on behalf of Carter Group Limited
and the Catholic Diocese of Christchurch

Dated: 18 October 2023

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

- 1 This memorandum of counsel is filed on behalf of Carter Group Limited and the Catholic Diocese of Christchurch (the *Submitters*).
- 2 The Submitters are scheduled to appear at the Central City and Commercial Zones hearing next Wednesday 25 October 2023. Counsel for the Submitters has not been able to file legal submissions in accordance with the IHP Hearings Procedures, being five working days prior to the Submitters' allocated speaking time, as a result of illness. Unfortunately, counsel will not be in a position to file legal submissions before the weekend.
- 3 Counsel respectfully seeks an extension to file legal submissions on behalf of the Submitters by 12pm next Tuesday 24 October. No party is likely to be prejudiced by the extension because:
 - 3.1 there is no opportunity for submitters or Council to respond to legal submissions prior to the hearing; and
 - 3.2 counsel will speak to its legal submissions and answer questions from the IHP at the hearing.

Dated 18 October 2023



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