

**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 of the hearing of submissions on Plan Change 14  
(Housing and Business Choice) to the Christchurch  
District Plan

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**MEMORANDUM OF COUNSEL ON BEHALF OF MINISTRY OF JUSTICE  
28 July 2023**

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**MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:**

- 1 This memorandum is filed on behalf of the Ministry of Justice (submission number 910) in response to the Pre-hearing Meeting Agenda dated 10 July 2023 encouraging submitters to file memoranda with the Independent Hearing Panel (**IHP**) in advance of the pre hearing conference on specified procedural matters.
- 2 In addition, the IHP advised it would assist if submitters provided the information in relation to who will represent them at the hearing (lawyer, or individual in person, or expert witness) and indicate, where known, the number of witnesses they are likely to call, the names of those witnesses and their role/expertise.

**Representation at the hearing**

- 3 Wynn Williams will represent the Ministry of Justice.
- 4 Ms Fiona Small, Planning Expert, will provide planning evidence for the Ministry of Justice at the hearing.

**Other matters**

- 5 In respect of the draft hearing schedule and procedures, the Ministry of Justice seeks clarification whether legal submissions are due on 9 October 2023<sup>1</sup> for all submitters, or 5 working days before the relevant hearing for the submitter.<sup>2</sup>
- 6 There are no other preliminary legal issues, comments on the draft hearing schedule or draft hearing procedures, or procedural matters the Ministry of Justice wishes to raise at this time.

**Dated** this 28<sup>th</sup> day of July 2022



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**L F de Latour**  
**Counsel for Ministry of Justice**

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<sup>1</sup> Minute 3 of the IHP dated 10 July, Appendix 2 – Indicative timeline indicates that all legal submissions are due on 9 October 2023.

<sup>2</sup> Minute 3 of the IHP dated 10 July, Appendix 3 – Draft Hearing Procedures at paragraph 88 indicates that legal submissions need to be provided 5 working days prior to the submitter's allocated speaking time at the relevant hearing.