BEFORE INDEPENDENT HEARING COMMISSIONERS AT CHRISTCHURCH

I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE KI ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions and further

submissions on Plan Change 14 to the

Operative Christchurch District Plan

MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND COMMUNITIES

23 JUNE 2023

Instructing solicitor:

C E Kirman
Special Counsel
Kāinga Ora - Homes and Communities
PO Box 14594
Central Auckland 1051
E: claire.kirman@kaingaora.govt.nz

Counsel instructed:

B J Matheson Richmond Chambers PO Box 1008 Shortland Street Auckland 1140

E: matheson@richmondchambers.co.nz

MEMORANDUM OF COUNSEL FOR KĀINGA ORA – HOMES AND COMMUNITIES

May it please the Commissioners:

- This memorandum is filed by Kāinga Ora Homes and Communities ("Kāinga Ora") in response to Minute #2 of the Independent Hearing Panel ("IHP") hearing submissions on Plan Change 14 ("PC14") to the Operative Christchurch District Plan ("Plan").
- Counsel has considered the requests for amendments to the existing timetable in the memorandum filed on behalf of Christchurch City Council ("Council").
- Counsel are comfortable with the proposed amendments, with the exception of the reduction in the time period between release of the Council's s 42A report and evidence-in-chief, and the expert evidence for submitters.
- 4. It is not yet known to what extent the content of PC14 will be amended through the section 42A report in response to submissions and further submissions. However, it is important that submitters have sufficient time to consider any changes, the rationale for which will differ from that contained in the original s 32 reports.
- On that basis, counsel submit that, if the Council's request for an extension is granted, the date for submitter expert evidence should be extended to Friday 22 September 2023, with expert conferencing to commence the following Monday 25 September 2023. That timetable still allows two weeks for expert conferencing in advance of the hearings commencing on 9 October 2023.¹

Dated 23 June 2023

Bal Matheson | Aidan Cameron

Counsel for Kāinga Ora

Noting that time has been reserved for further expert conferencing on the Monday and Friday of each sitting week, which Kāinga Ora supports.