

**Before the Christchurch Replacement
District Plan Independent Hearings Panel**

In the matter of the Resource Management Act 1991 and the
Canterbury Earthquake (Christchurch Replacement
District Plan) Order 2014

And

In the matter of submissions and further submissions on the
Proposed Christchurch Replacement District Plan
(Chapter 8 - Subdivision, Development and
Earthworks (Part))

**MEMORANDUM OF COUNSEL FOR FULTON HOGAN LIMITED
NOTICE OF INTENTION TO CROSS-EXAMINE WITNESSES**

SUBDIVISION, DEVELOPMENT AND EARTHWORKS HEARING

DATED: 15 June 2015

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

1. This Memorandum is filed on behalf of Fulton Hogan Limited (FHL) in relation to the Subdivision, Development Earthworks Proposal Hearing.
2. The purpose of this Memorandum is to seek leave to cross-examine witnesses, and to give notice of:
 - 2.1 the witnesses that FHL seeks leave to cross-examine;
 - 2.2 topics to be covered by cross-examination; and
 - 2.3 the length of cross-examination.
3. This Memorandum is filed in accordance with clause 22(e) of the Christchurch Replacement District Plan Hearings Procedures (dated 14 January 2015) and Direction B of the Hearings Panel's 6 March 2015 Minute.

Witnesses to be cross-examined

4. Counsel for FHL seeks leave to cross-examine Mr Andrew Long who has been called as a witness for the Christchurch City Council.

Topics and estimated length of cross-examination

5. Counsel seeks to cross-examine Mr Long for a period of no more than 10 minutes on the higher order policy directives for enabling recovery (including development in greenfield priority areas) and the compatibility of appropriate quarrying with those directives and objectives.

Dated: 15 June 2015



A C Limmer / G C Hamilton
Counsel for Fulton Hogan Limited