

**BEFORE THE CHRISTCHURCH REPLACEMENT  
DISTRICT PLAN 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 the Residential  
Proposal (part) of the  
proposed  
Replacement District  
Plan

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**MEMORANDUM OF COUNSEL ON BEHALF OF CHRISTCHURCH CITY  
COUNCIL AND NGAI TAHU PROPERTY LIMITED**

**25 MARCH 2015**

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 **Simpson Grierson**  
Barristers & Solicitors

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**MAY IT PLEASE THE PANEL:**

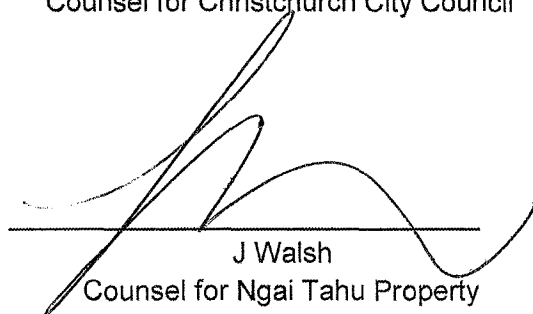
1. This joint memorandum is filed on behalf of the Christchurch City Council (**Council**) and Ngai Tahu Property Limited (**NTPL**).
2. The Council is in the process of finalising its rebuttal evidence for the hearing on the Residential Proposal, which is due at 5pm today.
3. When the evidence of Mr Jason Jones on behalf of NTPL was filed with the Secretariat on Friday 20 March, counsel for NTPL mistakenly omitted to copy the email to counsel for the Council. Accordingly, counsel for the Council only received the statement of evidence yesterday, Tuesday 24 March, the day before the Council's rebuttal evidence is due.
4. In these circumstances, the Council and NTPL respectfully seek an extension to the filing of the Council's rebuttal evidence to Mr Jones' evidence, to 3pm this Friday 27 March.
5. Counsel for the Council notes that Mr Scott Blair (for the Council) considers that some of Mr Jones' suggestions have some merit, and would like to take a considered view rather than rushing changes into the Revised Chapter that must be circulated today.

**DATED** 25 March 2015



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S J Scott  
Counsel for Christchurch City Council



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J Walsh  
Counsel for Ngai Tahu Property