

**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

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

25 MARCH 2015

 **Simpson Grierson**
Barristers & Solicitors

Simpson Grierson
S J Scott / H P Harwood
Telephone: +64-3-968 4018
Facsimile: +64-3-379 5023
Email: sarah.scott@simpsongrierson.com
PO Box 874
SOLICITORS
CHRISTCHURCH 8140

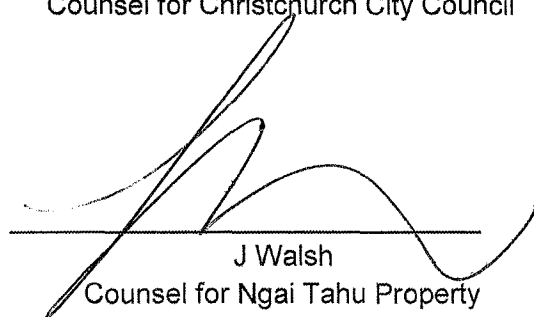
MAY IT PLEASE THE PANEL:

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



S J Scott
Counsel for Christchurch City Council



J Walsh
Counsel for Ngai Tahu Property