

S 161

BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER

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

IN THE MATTER OF

**THE PROPOSED CHRISTCHURCH
REPLACEMENT DISTRICT PLAN
STAGE 1**

SUBMITTER

**HOUSING NEW ZEALAND
CORPORATION (SUBMITTER
495)**

NOTICE OF CROSS-EXAMINATION

Dated: 25 March 2015

Have granted
[Signature]
26/3/15

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LAWYERS
CHRISTCHURCH
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- 1 We act for Housing New Zealand Corporation (HNZC) in respect of the hearing on the Residential Proposal.
- 2 The Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 (OIC) at schedule 3, clause 4(6)(b) allows the Hearings Panel to permit cross-examination.
- 3 Clause 22 (d)-(l) of the Christchurch Replacement District Plan Hearings Procedures, Directions I - K of the Residential Pre-hearing Report and Directions (18 February 2015) and clauses 27 - 29 of the Pre-hearing Report (18 February 2015) direct that where a party wishes to seek leave to cross-examine a witness it must do so by Notice filed by 25 March 2015.
- 4 HNZC seeks leave to cross-examine the following witnesses:
 - **Brigid Mary O'Brien** (CCC) – infrastructure constraints in CHRM areas (10 minutes).
 - **Dr James Douglas Marshall Fairgray** (CCC) – CHRM capacity (10 minutes).
 - **Adam Scott Blair** (CCC) – specific residential provisions as amended by the evidence of Mr Maurice Dale (10 minutes).
 - **Matthew William Bonis** (CIAL) – social housing within the 50 Ldn dBA noise contour (10 minutes).
- 5 Cross-examination of the witness above on the topics listed will comply with the Christchurch Replacement District Plan Hearings Procedures (12 November 2014) clause 22(d) in that:
 - (a) It will assist the Hearings Panel to better understand issues that are relevant to the preparation of its recommendations;
 - (b) It is consistent with the principles set out in clause 12 of the Christchurch Replacement District Plan Hearings Procedures (12 November 2014);

- (c) HNZC has called evidence that pertains to the above expert witnesses' evidence;
 - (d) HNZC abide any directions of the Hearings Panel as to cross-examination;
 - (e) The cross-examination is for the purposes of putting conflicting evidence to the witnesses to confirm their view.
- 6 Counsel also notes that this Notice is filed prior to receiving Rebuttal Evidence from the Christchurch City Council as proponent of the Replacement Plan. It is possible that some matters raised in the above cross examination topics are addressed in the Rebuttal Evidence which may alter the nature or extent of cross examination required.

DATED this 25th day of March 2015



L J Semple

Counsel for Housing New Zealand Corporation