

**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 the Christchurch Replacement District Plan
(Chapter 10: Designations and Heritage Orders)

**MEMORANDUM OF COUNSEL FOR:
- SUBMITTER 55 (GARY NEIL McVICAR)
- SUBMITTER 777 (ERROLL SMITH)
- SUBMITTER 798 (JOHN BOOTH)
SEEKING EXTENSION OF TIME TO FILE LEGAL SUBMISSIONS
IN RELATION TO CHRISTCHURCH INTERNATIONAL
AIRPORT LIMITED'S DESIGNATION**

Dated 19 February 2015

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MAY IT PLEASE THE PANEL

1. Counsel is in receipt of the legal submissions filed by Christchurch International Airport Limited (CIAL) yesterday, 18 February 2015.
2. At paragraph 38 of those submissions, reference is made to the suggested wording which had been provided to me on Friday 13 February 2015 (by email at 4.59pm). Following consideration of those documents at the beginning of this week, I had a discussion with Ms Appleyard on Tuesday and advised that comments would be provided on each of the draft documents. A letter had been drafted, and following final review, was to be sent today, although regrettably CIAL's documents have now already been filed. I had anticipated finalising submissions once agreement had been reached on an appropriate wording of the REPA designation and a permitted baseline.
3. As CIAL has filed its legal submissions, it is now more appropriate that Counsel raise the issues with the draft documents in the legal submissions to be filed.
4. Due to other Court deadlines this week, Counsel seeks an extension of time to file legal submissions on the draft documents and other issues raised at the hearing, to this Friday, 20 February 2015.

Dated this 19th day of February 2015.



P A Steven QC

Counsel for G N McVicar,
Erroll Smith and John Booth