

**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 the Introduction Proposal
(Part) and Definitions Proposal
(Part) – Stage 1

**MEMORANDUM OF COUNSEL ON BEHALF OF THE CHRISTCHURCH CITY COUNCIL
SEEKING LEAVE TO FILE EVIDENCE OUT OF TIME**

23 JULY 2015

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MAY IT PLEASE THE PANEL:

1. In the Minute dated 14 July 2015 the Panel required the Christchurch City Council (**Council**) to file its further written responses in relation to "residential matters" by 3pm, Wednesday 22 July 2015.
2. The Council respectfully seeks leave to file the supplementary evidence of Mr Ivan Thomson on "residential matters" a day late.
3. The Council notes that the delay in filing the evidence has been caused by the need for Mr Thomson to liaise with the Chapter Leader for the Residential Proposal who returned from leave on 20 July 2015 on a large number of the definitions which the Panel sought further information on. We also record that Mr Thomson was waiting to hear back from a number of submitters to confirm their position on a number of definitions, which further delayed the drafting of his evidence.
4. The Council records that the late filing of its evidence will have an impact on the ability for submitters to file closing submissions on the "residential matters" in the timeframe set by the Panel (i.e. 3pm 23 July 2015). The Council therefore respectfully seeks that the Panel direct that submitters be given an extra day to file closing submissions on this topic.

DATED at Wellington this 23rd day of July 2015



K E Viskovic
Counsel for the Christchurch City Council