

**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)

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

22 JULY 2015

 **Simpson Grierson**
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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 the definition of "infrastructure" by 3pm, Tuesday 21 July (paragraph [4]).
2. The Council respectfully seeks leave to file the supplementary evidence of Ms Janice Carter on the definition of "infrastructure" a day late.
3. The Council notes that the delay in filing the evidence has been caused by the need for Ms Carter to consider the implications of the Panel's decision on the Natural Hazards Proposal (Part), dated 17 July 2015, and to enable discussions with other parties with an interest in the definition of "infrastructure". We record that there have been some limitations on the availability of parties to meet to discuss the definition.

DATED at Wellington this 22nd day of July 2015



K E Viskovic
Counsel for the Christchurch City Council