

**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)

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

**22 JULY 2015**

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 **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 22<sup>nd</sup> day of July 2015



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K E Viskovic  
Counsel for the Christchurch City Council