

**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

**SUBMITTER** **CANTERBURY EARTHQUAKE RECOVERY AUTHORITY  
FOR AND ON BEHALF OF THE CROWN**  
(Submitter 495)

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**MEMORANDUM OF COUNSEL FOR THE CROWN REGARDING  
APPEARANCES AT THE INTRODUCTION PROPOSAL HEARING**

**Introduction Proposal**

Dated 10 July 2015

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**BUDDLEFINDLAY**  
NEW ZEALAND LAWYERS  
Barristers and Solicitors  
Christchurch

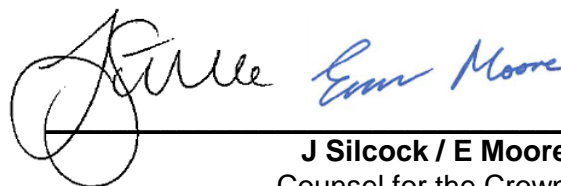
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**MAY IT PLEASE THE HEARINGS PANEL:**

1. This memorandum is filed on behalf of the Crown.
2. The purpose of this memorandum is to seek directions from the Hearings Panel regarding Mr Stephen Timms' (planning witness for the Crown) appearance at the hearing for the Introduction Proposal. The joint memorandum on behalf of the Crown and the Council regarding the Definitions Proposal dated 10 July 2015 seeks similar directions in relation to Mr Timms' appearance at the hearing in respect of the Definitions Proposal.
3. Mr Timms' evidence for the Introduction Proposal confirms that an agreement has been reached between the Council, the Crown and Te Rūnanga O Ngāi Tahu in relation to the Introduction Proposal.<sup>1</sup> The Crown is satisfied that there are no outstanding points of difference with the Council and the Crown in relation to its submission points and relief on the Introduction Proposal. The Crown has received no notice seeking to cross-examine Mr Timms from any party.
4. In accordance with paragraph 4(b) of the Hearings Panel's Minute dated 22 May 2015, the Crown respectfully seeks direction from the Hearings Panel as to whether it has any questions for Mr Timms. In the event that no questions arise, the Crown respectfully requests that Mr Timms' appearance at the hearing be excused.

Dated 10 July 2015

  
**J Silcock / E Moore**  
Counsel for the Crown

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<sup>1</sup> Evidence of Stephen Timms dated 30 June 2015.