

**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)

**MEMORANDUM OF COUNSEL FOR THE CROWN
NOTICE OF INTENTION TO CROSS-EXAMINE WITNESSES**

Definitions Proposal

Dated 9 July 2015

BUDDLEFINDLAY
NEW ZEALAND LAWYERS
Barristers and Solicitors
Christchurch

Solicitor Acting: **Cedric Carranceja / Jenna Silcock**
Email: cedric.carranceja@buddlefindlay.com / jenna.silcock@buddlefindlay.com
Tel 64 3 3791 747 Fax 64 3 3795 659 PO Box 322 DX WX11135 Christchurch 8140

Counsel Acting: **Paul Radich QC**
Tel 64 4 974 5951 Fax 64 4 974 5955 PO Box 10731 Wellington 6143

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 leave to cross-examine witnesses, and to give notice regarding:
 - (a) the witnesses the Crown seeks leave to cross-examine;
 - (b) topics to be covered in cross-examination; and
 - (c) the length of cross-examination time for each witness.

Witnesses to cross-examine

3. The Crown gives notice that it seeks leave to cross-examine the following witnesses:
 - (a) Mr Ivan Thomson on behalf of Christchurch City Council; and
 - (b) Ms Janice Carter on behalf of Christchurch City Council.

Topics to be covered in cross-examination

4. It is intended that Mr Thomson will be cross-examined on further improvements that could be made to Proposal 2 to the extent that he is called in support of a position that is inconsistent with the Crown's case.
5. It is intended that Ms Carter will be cross-examined on natural hazards terms and definitions to the extent that she is called in support of a position that is inconsistent with the Crown's case.

Estimated cross-examination time

6. The Crown intends to limit cross-examination to a maximum of 10 minutes for each witness.

Dated 9 July 2015

The image shows two handwritten signatures in blue ink. The signature on the left is 'J Silcock' and the signature on the right is 'E Moore'. Both are written in a cursive, flowing style.

J Silcock / E Moore
Counsel for the Crown