

**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

**A N D**

**IN THE MATTER** of the Natural and Cultural Heritage  
Proposal including deferred Stage 1  
Cultural provisions in Chapter 16  
Industrial General (North Belfast) Zone,  
Chapter 8 and Chapter 2 Definitions

**MEMORANDUM OF COUNSEL FOR THE CHURCH PROPERTY  
TRUSTEES FOR PRE-HEARING MEETING FOR NATURAL AND  
CULTURAL HERITAGE (STAGE 3) ON 28 OCTOBER 2015  
(SUBMISSION NOS 3670, 3610 AND FURTHER SUBMISSION  
5023 AND 5040)**

**DATED: 28 OCTOBER 2015**

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**MEMORANDUM OF COUNSEL FOR THE CHURCH PROPERTY TRUSTEES FOR PRE-HEARING MEETING FOR NATURAL AND CULTURAL HERITAGE (STAGE 3) ON 28 OCTOBER 2015 (SUBMISSION NOS 3670, 3610 AND FURTHER SUBMISSIONS 5023 AND 5040)**

**DATED: 28 OCTOBER 2015**

**MAY IT PLEASE THE PANEL**

1. **Introduction**

This memorandum is to be submitted on behalf of the Church Property Trustees in advance of the pre-hearing meeting for the Stage 3 Natural and Cultural Heritage hearing, scheduled for 4p.m. on Wednesday 28 October 2015.

2. **Categorisation of submissions**

The submissions of the Church Property Trustees, the Roman Catholic Bishop of the Diocese of Christchurch and Alpine Presbytery are categorised as follows:-

- (i) A joint general submission on behalf of the Church Property Trustees and the Roman Catholic Bishop of the Diocese of Christchurch and Alpine Presbytery. This joint submission relates to heritage matters other than in respect of the Christchurch Cathedral and the Christchurch Cathedral of the Blessed Sacrament. This submission is a joint submission where the parties will be sharing certain expert witnesses.
- (ii) A separate submission in relation to the Christchurch Cathedral by the Church Property Trustees.
- (iii) A separate submission by the Roman Catholic Bishop of the Diocese of Christchurch in respect of the Christchurch Cathedral of the Blessed Sacrament.

**Attached** to this memorandum is a schedule showing the witnesses who are intended to be called in relation to each of the several submissions.

3. ***The proposed timetable***

***Christchurch City Council proposal***

It is noted from the memorandum filed on behalf of the Christchurch City Council that expert witness conferencing is scheduled for 9 and 10 November 2015 with facilitated mediation on 18, 19 and 24 November 2015.

***Request for extension of timetable***

It is noted that the Council's revised proposal is to be received on 5 November 2015. There is only one day between the receipt of the revised of the proposal and the first date for the expert witness conferencing, namely 9 and 10 November 2015. It is thought that it would be advantageous for witnesses for the submitters to have a proper opportunity to consider the Council's revised proposal before the expert witness conferencing commences. Thus it is suggested that the expert witness conferencing be held on ***Monday 16 and Tuesday 17 November 2015.***

It is respectfully submitted that a facilitated mediation should consequentially be extended to ***Monday 23 to Wednesday 25 November 2015.***

The reasons for the tight timeframe in relation to the lodging of evidence is understood. Notwithstanding this, the Church Property Trustees would prefer a short extension to the time for lodging evidence-in-chief (presently set at 10 December 2015). ***A further week is respectfully suggested.***

4. ***Approach to presentation of evidence***

The Church Property Trustees propose to confer with the Roman Catholic Bishop of the Diocese of Christchurch and Alpine Presbytery in an attempt to limit the number of witnesses, and in particular expert witnesses, that are called. Thus the witness list may be able to be abbreviated, depending upon:-

- (i) the question of which issues are still live issues at the time of the lodging of evidence;
- (ii) the extent of co-operation possible between submitters resulting in the sharing of expert witnesses.

**DATED** this 28th day of October 2015



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**A C HUGHES-JOHNSON QC  
COUNSEL FOR THE CHURCH  
PROPERTY TRUSTEES**

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**Witnesses – Areas of Expertise – Pre-hearing meeting – Chapter 9 – 28 October 2015**

**Joint Submission – Church Property Trustees, the Roman Catholic Bishop of the Dioceses of Christchurch, and Alpine Presbytery (#3670, and FS-5023 on behalf of Church Property Trustees and Alpine Presbytery)**

1. Heritage;
2. Heritage engineering / engineering;
3. Economics (joint between the submitters);
4. Quantity Surveyor;
5. Liturgical; and
6. Planning (joint between the submitters).

**Cathedral Submission – Church Property Trustees (#3610 and FS-5040)**

1. Heritage;
2. Engineering;
3. Economics (joint between the submitters);
4. Quantity Surveyor;
5. Liturgical; and
6. Planning (joint between the submitters).

**Submission – Roman Catholic Bishop of the Diocese of Christchurch (#3692 and FS-5007)**

1. Heritage;
2. Engineering;
3. Economics (joint between the submitters);
4. Quantity Surveyor;
5. Liturgical; and
6. Planning (joint between the submitters).