

**BEFORE THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN  
HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act 991 and the Canterbury  
Earthquake (Christchurch Replacement District Plan)  
Order 2014

**AND**

**IN THE MATTER** of the Natural and Cultural Heritage Proposal of Stage 3  
of the Christchurch Replacement District Plan

**SUBMITTER** CHURCH PROPERTY TRUSTEES (3610 and 3670)

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**APPLICATION ON BEHALF OF CHURCH PROPERTY TRUSTEES  
SEEKING LEAVE TO EXCUSE WITNESSES FROM  
APPEARING AT HEARING**

22 January 2016

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*check with panel.  
If no questions  
leave granted.  
JWA  
22/1/16*

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**WYNN WILLIAMS  
LAWYERS  
CHRISTCHURCH**

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**MAY IT PLEASE THE HEARINGS PANEL**

- 1 This memorandum is filed on behalf of Church Property Trustees ("CPT") in relation to submissions made on Stage 3, Chapter 9 – Natural and Cultural Heritage, being:
  - (a) submission 3610 in relation to ChristChurch Cathedral; and
  - (b) submission 3670, a joint submission with the Roman Catholic Diocese and Alpine Presbytery.
  
- 2 The purpose of this Memorandum is to seek directions from the Hearings Panel regarding the following witnesses for CPT:
  - (a) Gavin Holley (Submission 3610); and
  - (b) Dean Lawrence Kimberley (Submission 3670).
  
- 3 We note that the legal submissions and calling of witnesses for submission 3670 is being carried out by Chapman Tripp to avoid unnecessary duplication at the hearing.
  
- 4 Mr Holley has filed evidence dated 10 December 2015 addressing matters in relation to the ChristChurch Cathedral building and the relief sought in submission 3610.
  
- 5 Dean Lawrence has filed evidence dated 10 December 2015 in relation to the use of churches and liturgical requirements within the Anglican church, and the relief sought in submission 3670.
  
- 6 Neither Mr Holley nor Dean Lawrence have filed rebuttal evidence. No party has sought to cross examine either Mr Holley or Dean Lawrence.
  
- 7 If the Panel does not intend to ask questions of Mr Holley or Dean Lawrence, Counsel respectfully seeks that they be excused from appearing at the Hearing.

Dated this 22<sup>nd</sup> day of January 2016



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J W A Johnson  
Counsel for Church Property Trustees