

Before the Independent Hearings Panel  
at Christchurch

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*under:* the Resource Management Act 1991 and the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

*in the matter of:* Submissions and further submissions in relation to the proposed Christchurch Replacement District Plan

*and:* The Chapter 21: Specific Purpose (Burwood Landfill and Resource Recovery) Zone **Stage 3** proposal

*and:* **Burwood Resource Recovery Park Limited**  
*Submitter 3444*

Memorandum of Counsel in relation to cross-examination leave application

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Dated: 2 December 2015

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REFERENCE: JM Appleyard (jo.appleyard@chapmantripp.com)

**Chapman Tripp**  
T: +64 3 353 4130  
F: +64 3 365 4587

245 Blenheim Road  
PO Box 2510, Christchurch 8140  
New Zealand

www.chapmantripp.com  
Auckland, Wellington,  
Christchurch

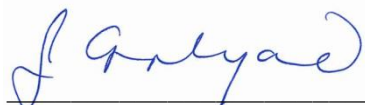


**MEMORANDUM OF COUNSEL IN RELATION TO CROSS-  
EXAMINATION LEAVE APPLICATION**

May it please the Panel:

- 1 This morning Burwood Resource Recovery Park (*BRRP*) applied for leave to cross-examine Ms Jan Burney in relation to her evidence on the Specific Purpose (Burwood Landfill and Resource Recovery) Zone Stage 3 proposal.
- 2 Ms Burney's evidence in fact relates to the Specific Purpose (Flat Land Recovery) Zone proposal (see email from Ms Burney's registered submitter email, *chrgary@xtra.co.nz*, dated 2 December 2015 at 12:25 pm to, *inter alia*, the Panel).
- 3 Accordingly, BRRP withdraws its application for leave to cross-examine Ms Burney dated 2 December 2015.
- 4 We apologise to the Panel for any confusion.

Dated: 2 December 2015



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**JM Appleyard**

Counsel for Burwood Resource Recovery Park Limited