

**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, 2387 and 3721)

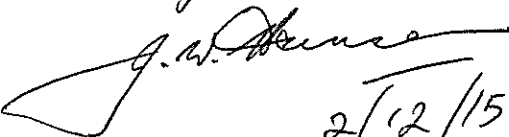
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**MEMORANDUM OF COUNSEL FOR THE CROWN  
NOTICE OF INTENTION TO CROSS-EXAMINE WITNESSES**

**Stage 3 - Proposal 21: Specific Purpose Zones**

Dated: 2 December 2015

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*Leave granted.*  
  
*2/12/15*

**BUDDLE FINDLAY**

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 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 witness listed in Appendix "A" to this memorandum.

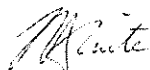
**Topics to be covered in cross-examination**

4. It is intended that the witness identified in Appendix "A" will be cross-examined on the corresponding topic listed alongside the witness's name in Appendix "A" to the extent that the witness is called in support of a position that is inconsistent with the Crown's case.

**Estimated cross-examination time**

5. The Crown respectfully seeks leave to cross-examine the witness for 30 minutes.

Dated 2 December 2015



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D Allen / J White  
Counsel for the Crown

**Appendix A - Schedule of witnesses to be cross-examined**

<b>Party</b>	<b>Witness to be cross-examined</b>	<b>Topics intended to be covered in cross-examination</b>
Christchurch City Council	Mr Eman	Planning provisions in relation to the Specific Purpose (Flat Land Recovery) Zone.