

**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** Specific Purpose (Burwood Landfill and Resource  
Recovery Park) Zone (Stage 3) of the Christchurch  
Replacement District Plan

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**MEMORANDUM OF COUNSEL FOR THE CROWN  
SEEKING LEAVE TO EXCUSE WITNESS**

3 December 2015

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**BUDDLE FINDLAY**

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**MAY IT PLEASE THE PANEL**

1. This memorandum is filed on behalf of the Crown.
2. The purpose of this memorandum is to seek directions from the hearings panel regarding Mr Mathew Clark's appearance at the Specific Purpose (Burwood Landfill and Resource Recovery Park) Zone (Stage 3) of the Christchurch Replacement District Plan.
3. Mr Clark has provided evidence for the Crown in these proceedings on the topic of land clearance.
4. No party has sought to cross examine Mr Clark.
5. In accordance with paragraph 4(b) of the Hearings Panel's Minute dated 22 May 2015, the Crown respectfully seeks direction from the Hearings Panel as to whether it has any questions for Mr Clark. In the event that no questions arise, the Crown respectfully requests that Mr Clark's appearance at the hearing be excused.

Dated 3 December 2015



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D Allen / J White  
Counsel for the Crown