

**BEFORE AN INDEPENDENT HEARING COMMISSIONER ON BEHALF OF THE
CHRISTCHURCH CITY COUNCIL**

UNDER

the Resource Management Act 1991

IN THE MATTER OF

The hearing of further submissions by **Canterbury
Rugby Football Union** (FS101 and FS98) on Plan
Change 13 to the Operative Christchurch District Plan

**MEMORANDUM OF COUNSEL ON BEHALF OF CANTERBURY RUGBY
FOOTBALL UNION SEEKING EXTENSION TO THE TIMEFRAME FOR FILING
EXPERT EVIDENCE**

3 JUNE 2025

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MEMORANDUM OF COUNSEL SEEKING LEAVE FOR AN EXTENSION TO FILE EXPERT EVIDENCE

- 1 We act for Canterbury Rugby Football Union (**CRFU**) who lodged two further submissions¹ on Plan Change 13 to the Christchurch City District Plan (**Operative Plan**).
- 2 Minute 1 of the Hearing Panel sets out timetabling directions for Plan Change 13. Specifically, Minute 1 directs that expert evidence must be filed by no later than **4pm, 6 June 2025** (the **Evidence Deadline**), with hearings to take place on 17 and 18 June 2025.²
- 3 This memorandum of counsel respectfully seeks a brief extension to the Evidence Deadline for CRFU until **4pm, 10 June 2025** (the **Extension Request**), for the following experts:
 - 3.1 Tim Joll (Planner); and
 - 3.2 John Brown (Heritage).
- 4 Despite CRFU's best efforts to meet the upcoming Evidence Deadline, unforeseen challenges have necessitated the Extension Request. This includes a sudden change in legal counsel for CRFU,³ coupled with the general unavailability of CRFU's key experts due to other hearing commitments.
- 5 CRFU respectfully seeks leave from the Panel for the Extension Request on grounds that:
 - 5.1 the extension is necessary for the provision of accurate and robust expert evidence by Mr Brown and Mr Joll, which is crucial to illuminating CRFU's concerns as raised in its further submissions;
 - 5.2 No prejudice will be caused to another party if this extension is granted, because:
 - (a) the extension requested by CRFU is brief; and
 - (b) sufficient time will remain before the hearing begins on 17 June 2025 for the expert evidence to be reviewed by the Panel, Council, and other relevant parties, noting that CRFU has requested to be heard on 18 June 2025.⁴
- 6 CRFU is grateful for the Panel's consideration of this request and look forward to receiving the Panel's response

Dated this 3rd day of June 2025



S A Chidgey
Counsel for Canterbury Rugby Football Union

¹ FS101 and FS98.

² With the possibility of extending into June 19, if further hearing time is required.

³ Counsel for CRFU is now Sam Chidgey of Tavendale and Partners Limited.

⁴ Timing yet to be confirmed by the Council.