

**BEFORE THE INDEPENDENT HEARINGS COMMISSIONER APPOINTED BY
THE CHRISTCHURCH CITY COUNCIL**

UNDER	the Resource Management Act 1991 (RMA)
IN THE MATTER	of an application for resource consent under section 88 of the RMA by Cambridge 137 Limited for demolition of a heritage building and construction of a hotel
APPLICANT	Cambridge 137 Limited

**JOINT MEMORANDUM OF COUNSEL SEEKING CHANGE OF
HEARING DATE**

6 September 2024

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MAY IT PLEASE THE HEARING COMMISSIONER

- 1 The hearing in relation the resource consent application made by Cambridge 137 Limited (**Applicant**) to demolish the building at 137 Cambridge Terrace, Christchurch (known as Harley Chambers) and build a hotel in its place (**Application**) has been scheduled to commence on 3 October 2024. The officer's s42A report is currently due to be circulated no later than Wednesday 11 September 2024.
- 2 These dates were set at a time when it was proposed that the Council would make its decisions on the Independent Hearing Panel's recommendations on Plan Change 14 (**PC14**) to the Christchurch District Plan (**District Plan**) on 4 September 2024.
- 3 This hearing timetable accordingly would have enabled the officer's s42A report to take into account the Council decisions on aspects of PC14 that are directly relevant to the Application, in particular whether Harley Chambers will remain as Group 2 (Significant) heritage building in Appendix 9.3.7.2, or not (and therefore whether resource consent is required to demolish the building under the Chapter 9 provisions of the District Plan), along with the relevant height limits applying to the Application site.¹
- 4 This timetable which was sought through the joint memorandum of counsel dated 7 August 2024 would have allowed the Application to be considered and heard under the framework of the operative rules (assuming the Independent Hearing Panel's recommendations are accepted), rather than under rules which are subject to change.
- 5 The Council advised parties on 3 September that it is delaying the making of the decision on PC14 as it applies to the Central City zones (which will include relevant heritage qualifying matters) from 4 September 2024 and that it now hopes to make a decision on or before 18 September 2024.
- 6 For the same reasons set out in the joint memorandum dated 7 August 2024 counsel seeks for the timetable and hearing to be adjourned again

¹ The full history of PC14 and implications of this change for the Application are set out in the joint memorandum of counsel dated 7 August 2024.

to accommodate the new date by which the Council intends to make its decision on the relevant aspects of PC14 .

- 7 Subject to the hearing commissioner's availability, the Applicant and Council respectfully seek the following alternative directions to those set out in paragraph 10 of Minute 2:
- (a) The officer's s42A report to be circulated no later than Wednesday 25 September 2024.
 - (b) The Applicant's evidence to be circulated no later than Wednesday 2 October 2024.
 - (c) Submitter expert evidence and the applicant's legal submissions to be provided no later Wednesday 9 October 2024.
 - (d) The hearing be rescheduled to 17 and 18 October 2024.
- 8 The Applicant and Council consider that this would enable the hearing to proceed in the most efficient manner for all parties, including the submitters on the Application.

Dated this 6th day of September 2024



L de Latour | E Pairman
Counsel for 137 Cambridge Terrace Limited



B Pizzey
Counsel for the Christchurch City Council