

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan

**MEMORANDUM OF COUNSEL FOR CHRISTCHURCH CITY COUNCIL
REGARDING PANEL REQUESTS FOR FURTHER INFORMATION**

Dated 10 November 2023

BUDDLE FINDLAY

Barristers and Solicitors
Wellington

Solicitors Acting: **Dave Randal / Cedric Carranceja**
Email: david.randal@buddlefindlay.com / cedric.carranceja@buddlefindlay.com
Tel 64 4 462 0450 / 64 3 371 3532
Fax 64 4 499 4141 PO Box 2694 DX SP20201 Wellington 6011

MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:

1. The Independent Hearings Panel has made various requests for further information from the Christchurch City Council (the **Council**) during the course of the hearing.
2. **Appendix A** contains a table recording the Panel's requests to date and, where the information has already been provided, the relevant details. The Council is working to respond to the balance of the requests as quickly as possible.
3. Counsel would be grateful for the Panel to advise if, on reflection, any of the queries no longer require a response.
4. Counsel will keep this table updated and can provide it to the Panel periodically.

Date: 10 November 2023



D G Randal / C O Carranceja
Counsel for Christchurch City Council

Appendix A – Panel's information requests and Council responses

Version as at 10 November 2023

No.	Panel information request	Document containing response
1.—	Advise of specific submission(s) seeking 'full intensification outcome'	Memorandum of counsel dated 26 October 2023. ¹ The submissions seeking removal of all qualifying matters include that of Hamish West (submission #500).
2.—	Provide updated <i>Colonial Vineyard</i> tests reflecting later amendments to the RMA	Appendix to the legal submissions for the Council for the Residential zone hearing dated 26 October 2023. ²
3.—	Classification of Residential Hills Zone as a " <i>relevant residential zone</i> "— explain approach, including by reference to Hutt City	Paragraphs 3.5 to 3.8 of the legal submissions for Residential zone hearing dated 26 October 2023. ³
4.—	Advise whether other local authorities have joined the <i>Waikanae</i> High Court proceedings	Memorandum of counsel dated 26 October 2023; ⁴ the answer is no (Kāpiti Coast District Council is the appellant in the High Court).
5.—	Update and supplement 'Strategic and Mechanics of PC14' document.	Appendix 1 to memorandum of counsel dated 31 October 2023. ⁵
6.—	Provide a table showing how the mandatory objectives 1 and 2 and policies 1 to 5 of Schedule 3A are proposed to be incorporated (notified and amended versions of PC14)	Appendix 2 to memorandum of counsel dated 31 October 2023. ⁶
7.—	Qualifying matters relating to coastal hazards— provide table showing pre-existing development rights under operative zones, to be retained by operation of these QMs	Appendix 3 to memorandum of counsel dated 31 October 2023. ⁷

¹ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-Panel-information-requests-26-October-2023.pdf>

² <https://chch2023.ihp.govt.nz/assets/Council-Evidence-11-August-2023/Christchurch-City-Council-Legal-submissions-Residential-Zones-Weeks-4-7-hearing-25-October-2023-31-October-2023-.pdf>

³ <https://chch2023.ihp.govt.nz/assets/Council-Evidence-11-August-2023/Christchurch-City-Council-Legal-submissions-Residential-Zones-Weeks-4-7-hearing-25-October-2023-31-October-2023-.pdf>

⁴ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-Panel-information-requests-26-October-2023.pdf>

⁵ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

⁶ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

⁷ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

No.	Panel information request	Document containing response
8.	Explain the qualifying matter for sites of cultural significance	Explained by Ms Hansbury at hearing on Wednesday, 18 October 2023.
9.	Model with more precision the effect of the sunlight access qualifying matter on plan-enabled and feasible capacity, potentially (the Panel is reflecting on this and will advise if it is required). If done, this analysis should include the assumed dimensions of houses (compared with the dimensions assumed by Parliament in enacting the Amendment Act)	This potential task is no longer required as it has been superseded by a subsequent request of David Hattam (item 49 below).
10.	Policy and/or method options for encouraging minimum levels of development	Appendix 4 to memorandum of counsel dated 31 October 2023. ⁸ More broadly, to be addressed in the Council's reply.
11.	Advise: <ul style="list-style-type: none"> • how the Operative District Plan enables non-housing activities in areas where intensification would be more appropriate, with such activities, than it is currently; and • whether providing additional enablement has been considered through PC14. 	Appendix 5 to memorandum of counsel dated 31 October 2023. ⁹
12.	Provide data held by Council on travel behaviour for different household cohorts, including the proportion of household trips undertaken by public transport. Advise what proportion of trips by an average family in Christchurch is not readily able to be catered for by public transport.	Appendix 6 to memorandum of counsel dated 31 October 2023. ¹⁰
13.	Life in Christchurch surveys — please provide the survey questions / methodology and breakdown of data	Appendix 7 to memorandum of counsel dated 31 October 2023. ¹¹
14.	Advise of matters of discretion applying for exceedance of height limits in central city in operative District Plan, including whether the need for building height was a relevant consideration	Memorandum of counsel dated 26 October 2023; ¹² under both the operative Plan and the PC14 framework (as notified), exceeding height limits triggers a consent for a discretionary activity.

⁸ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

⁹ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

¹⁰ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

¹¹ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

¹² <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-Panel-information-requests-26-October-2023.pdf>

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15.	<p>Advise on the influence of the National Policy Statement for Indigenous Biodiversity (NPS-IB) on this IPI process, including in respect of the following matters:</p> <ul style="list-style-type: none"> • In particular, is there an opportunity to proactively implement the NPS-IB by bolstering SES protection through this process? • If a submitter presents evidence that an additional site should be protected as an SES (and therefore be part of the QM), does the Panel have jurisdiction to assess / implement that relief? For a site not currently listed as a SES, would this be a new QM or an existing QM? • Would a 'buffer' added to an existing SES or other existing overlay QM be a new QM as opposed to an existing QM? Alternatively, could it be implemented by the Panel via a matter of discretion that could be considered as part of any relevant non-permitted activity resource consent? 	<p>To be addressed in legal submissions for City-wide Qualifying and Other Matters hearing.</p>
16.	<p>Advise on the appropriate approach to QMs proposed to be carried over from the operative District Plan via existing overlays, in particular in relation to otherwise enabled sites that are largely or totally covered by QM overlays. In particular, the Council is to provide direction on the following matters:</p> <ul style="list-style-type: none"> • Identify relevant properties that are entirely within a QM overlay – at a high-level only as opposed to every title. • For those identified properties, advise on whether the activity status proposed by the QM is appropriate and whether there is a realistic consenting pathway for residential development, taking into account the overlay provisions. • If there are properties entirely within a QM overlay and there is no realistic consenting pathway, the Council will advise on whether these properties should be 'downzoned' to give effect to the QM and make clear that the intention not to intensify. • If, following this assessment, the Council wishes to maintain its current overlay approach, Council will direct the Panel to the relevant section 32 analysis and/or supplement that analysis if required. 	<p>Preliminary information provided in Table G in Appendix 1 to memorandum of counsel dated 31 October 2023.¹³</p> <p>Further planning analysis to be provided separately, and the issues will otherwise be addressed in legal submissions for City-wide Qualifying and Other Matters hearing.</p>
17.	<p>With respect to the provisions of the operative District Plan that could restrict residential development that would otherwise be enabled through PC14, and are intended to carry on post-PC14 coming into effect but which are not identified as QMs, the Council will:</p> <ul style="list-style-type: none"> • provide a list of these provisions; • explain the Council's position on those provisions, either: <ul style="list-style-type: none"> ○ explaining why they were not identified as QMs; or 	<p>Planning analysis to be provided separately.</p> <p>The issues will otherwise be addressed in legal submissions for City-wide Qualifying and Other Matters hearing (Weeks 8 or 9).</p>

¹³ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

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	<ul style="list-style-type: none"> ○ confirming that, on reflection, they should have been identified as QMs; ● for any matters in the latter category, advise on the implications, considering (for example): <ul style="list-style-type: none"> ○ whether those matters been factored into the capacity analysis; and ○ what scope does the Panel have to retrospectively identify and retain QMs. 	
18.	Ms Ratka to provide s32AA analysis to support inclusion of the Mass Movement Management Area 1 as a QM	Planning analysis to be provided separately before Ms Ratka gives evidence at the City-wide Qualifying and Other Matters hearing.
19.	Advise whether earthquake recovery is relevant to consider in giving effect to policy 3, and whether it can be a QM	<p>The expert planners' conferencing on strategic objectives and other matters, directed by minute 20, is relevant to this query insofar as it will address how to integrate MDRS objectives and policies into the District Plan, which contains provisions relating to Christchurch's recovery.</p> <p>Counsel understand the Panel will advise subsequently if there are any legal matters requiring input.</p>
20.	Advise where the section 32 evaluation considers an option of having unlimited building heights in the city centre	<p>Memorandum of counsel dated 26 October 2023.¹⁴</p> <p>The relevant part of the section 32 evaluation is Part 4, which can be found here. Options 2 and 3 evaluated in the report had unlimited building heights in the city centre; the evaluation begins on page 59 of the PDF. Part 4 of the section 32 report has 11 appendices, almost all of which are relevant to the central city. They include economic cost/benefit analysis and a comprehensive urban design assessment.</p>

¹⁴ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-Panel-information-requests-26-October-2023.pdf>

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21.	<p>Could Mr Willis:</p> <ul style="list-style-type: none"> advise what he considers to be the relevant factors of a "well-functioning urban environment" (see also item 29 below); and explain the evaluation of building heights in the city centre, particularly in relation to quantifying the benefits and disbenefits of intensification as a tool to identify a height limit above which benefits would not be "maximised". 	<p>Planning analysis to be provided separately.</p> <p>The issues will otherwise be addressed in the Council's reply.</p>
22.	<p>Please explain how the heritage rules in PC14 work, including by reference to:</p> <ul style="list-style-type: none"> the operative rule framework for management and the use of discretionary and non-complying activity status (in light of the <i>Forest & Bird</i> decision encouraging less restrictive status to be applied) – Ms Richmond; and activity status in the context of Residential Heritage Areas, and any implications of the <i>Waikanae</i> decision – Ms Dixon. 	<p>Initial explanation provided by Ms Dixon on 1 November 2023 (note follow-up requests below, particularly item 42).</p> <p>Further explanation to be provided by Ms Richmond at the hearing relating to heritage.</p> <p>Written explanations to be provided as well.</p>
23.	Advise of the status of the development at 432 Sparks Road (owned by submitter #915, 25 KBR Limited), referred to at paragraph 8.1.62 of Mr Lightbody's section 42A report.	<p>Ms Harte (on behalf of 25 KBR Limited) advised, during her appearance on 9 November 2023, that the relevant resource consent application was lodged in the week of 30 October 2023.</p>
24.	Advise of the <i>Waikanae</i> implications of a landowner agreeing to a reduced development height, less than the <i>status quo</i>	To be addressed in Council's reply.
25.	Reconsider definitions of "building base" and "building tower" (including to consider associated rules)	Being considered by the Council planners; update to be provided.
26.	Explain the residential heritage areas methodology and the 'Site Contributions Maps'	<p>Explained by Ms Dixon when she appeared at the hearing on Wednesday, 1 November 2023.</p> <p>See also paragraphs 5 to 10 of Ms Dixon's hearing summary (here) and paragraphs 6.1 and 6.2 of Ms Dixon's section 42A report (here).</p>
27.	<p>Discuss the potential practical implications of the proposed PC14 provisions regarding wind assessments for tall buildings, including to comment on:</p> <ul style="list-style-type: none"> how the issue could be addressed of a developer providing a wind effects assessment and intervening 	<p>Technical and planning information to be supplied, and otherwise to be addressed in Council's reply.</p>

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	<p>changes – such as the Council subsequently requesting design changes, or a new building nearby obtaining resource consent – which may alter that assessment;</p> <ul style="list-style-type: none"> • the implications of a consented building assumed in that analysis not being built; • sequencing of work, such as the Council obtaining its own assessment, then the applicant disagreeing with that and obtaining its own assessment; • whether the Council intends to develop its own city- or CBD-wide tool to guide wind assessments; • whether a certification process linked with a permitted activity standard is a feasible option, and other pros and cons of certification. 	
28.	<p>Explain the extent of proposed controls requiring wind effects assessments for buildings above 20m in "residential urban environments": just residential zones or also centres?</p> <p>Should the height be 22m (or another height) instead of 21m in the Central City Mixed Use South Frame?</p> <p>Should the height for wind assessments in the city centre be 28m (or another height) instead of 30m?</p>	<p>Addressed by Ms Gardiner (centres) and Mr Kleynbos (residential urban environments) when they appeared at the hearing on 31 October and 1 November 2023 respectively.</p> <p>Updated provisions to be provided in due course will reflect those recommended changes.</p>
29.	<p>Council witnesses to provide updated analysis regarding:</p> <ul style="list-style-type: none"> • A bullet point list of objective elements contributing to an "exemplary" building (Alistair Ray) • The meaning, from an urban design perspective, of "high quality" and "good quality" (Alistair Ray) • A list of factors understood to contribute to a "well-functioning urban environment" (Alistair Ray, Holly Gardiner, and Nicola Williams, in addition to Andrew Willis (noted at 21 above)) • A potential tiered rule framework for assessing tall buildings, with certain criteria (including mass) being applicable between heights of 28m and (say) 45m, and others applying up to a higher height 	<p>Analysis to be provided separately.</p>
30.	<p>Tall buildings in CCZ – please explain whether a design-led approach has been assessed in the section 32 analysis.</p>	<p>Addressed by Ms Gardiner when she appeared at the hearing on Tuesday, 31 October 2023.</p> <p>Her summary statement (here) notes that: "<i>within the s32 report of relevance to the central city are pages 57 - 66 of the s32 report that considers the options regarding an intensification response for the City Centre Zone, including</i></p>

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		<i>Option 2 which considers the option of having no upper height limit, classifying all development as restricted discretionary".</i>
31.	Please provide housing research paper referred to by Nicola Williams	Appendix 8 to memorandum of counsel dated 31 October 2023 ¹⁵
32.	Planners to conference regarding provisions for the radiocommunications pathway qualifying matter	To be undertaken, with a joint witness statement provided to the Panel
33.	Kirk Lightbody to provide rebuttal statement confirming whether or not he agrees with the merits of rezoning requests sought through Foodstuffs' submission	Rebuttal statement supplied to the Panel Secretariat on 9 November 2023 (link to be added to this task list in due course).
34.	Provide a table explaining the Council's position on rezoning requests by submitters	Counsel have outlined the Council's position on rezoning requests, including in presenting legal submissions on the residential topic, and will reiterate this in future legal submissions. Detailed table to be provided with the Council's reply.
35.	Advise of any issues with qualifying matter flow charts provided by Kāinga Ora	To be confirmed.
36.	Provide information held by the Council on demand and feasible development capacity for different housing typologies	To be provided.
37.	Explain the operation of the multiple restricted discretionary activities (RD7 and RD8) in rule 14.6.1.3 in Plan Change 14 as notified	Explanation to be provided.
38.	Advise whether the rules in the residential chapter requiring limited or non-notification are likely to lead to those outcomes, notwithstanding other activities requiring consent (such as earthworks).	Advice to be provided.
39.	Confirm whether various references in the residential chapter to "sunlight" and "daylight" deliberately refer to different things.	To be provided.
40.	Regarding the sunlight access qualifying matter, advise whether potential health effects associated with sunlight were factored into the Council's section 32 evaluation	To be provided.

¹⁵ <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-counsel-for-Christchurch-City-Council-31-October-2023-Providing-documents-in-response-to-requests-for-further-information.pdf>

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41.	Regarding the Pūteringamotu Riccarton Bush qualifying matter, provide a table of submitters opposing the qualifying matter who own a site within the qualifying matter area	To be provided.
42.	<p>Provide a table and commentary describing the Residential Heritage Areas (RHAs) and Residential Character Areas (RCAs), to address:</p> <ul style="list-style-type: none"> • The proposed zoning within each area and what the proposed zoning would have been, but for the qualifying matter • The RHAs where an interface area is proposed to apply • The number of properties in each area • Where the RHAs and RCAs overlap • Where officers now recommend a different outcome to the notified version of Plan Change 14 (including any properties proposed to be removed from the RHA interface area) • Any listed heritage sites falling within the RHAs and RCAs • Which provisions in Plan Change 14 are equivalent to or more enabling of development than the status quo, and which are more restrictive (in a Waikanae sense) • Which RCAs were identified as SAMs in the 1995 District Plan <p>Provide associated mapping showing the different site types (defining, contributory, etc) for each RHA and RCA, including both sets of values where RHAs and RCAs overlap, and including recommended changes.</p>	<p>Table provided to Panel Secretariat on 7 November 2023 (link to be added to this table once available).</p> <p>Additional matters to be provided.</p>
43.	In respect of Rule 9.3.6.4, proposed matter of discretion (e) (<i>"whether the site has cultural or spiritual significance to mana whenua or is to be used for Papakāinga/Kāinga Nohoanga and the outcome of any consultation undertaken with Papatipu Rūnanga"</i>), clarify policy and rule linkage and consider splitting into two separate matters.	Explanation to be provided.
44.	Provide a table listing the localities subject to operative Residential New Neighbourhood zoning that is proposed to be amended through Plan Change 14. Note which parts of which areas are proposed to be rezoned Medium Density Residential and which are to be renamed Future Urban Zone.	To be provided.
45.	<p>For RCAs, provide a diagram showing the linkage between the policies (including any direction such as avoid / manage / etc), rule triggers (including exceedances of built form standards) and activity status for relevant activities, for both the notified and current recommended versions of Plan Change 14.</p> <p>In the context of Ms Dysart's submission supporting the Beckenham RCA (which excludes backyard areas), explain whether this exclusion:</p> <ul style="list-style-type: none"> • is particular to Beckenham or common to all RCAs; • is given effect through mapping, rules, or both – including to demonstrate whether the RCAs 	To be provided.

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	predominantly reflect streetscape matters or broader values.	
46.	<p>Liz White and Kirk Lightbody to liaise and advise of discussions with mana whenua regarding papakāinga housing in Lyttelton.</p> <p>Response: The discussions held with mana whenua (Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga) regarding papakāinga housing in Lyttelton were attended by Mr Kleynbos, Ms Dixon and Ms White, and related to the request by the submitter to vary the RHA and RCA provisions applying within Lyttelton to better enable Rāpaki Rūnanga to develop housing for mana whenua.</p> <p>With respect to RCAs (and noting other changes have been recommended in response to this submission by Mr Kleynbos and Ms Dixon), this resulted in amendment being recommended to the RCA assessment matters in Rule 14.15.27. This is the matter Ms White was referring to when questioned by the Panel.</p> <p>Mr Lightbody was not part of that meeting, and during the meeting the matters on which Mr Lightbody was reporting were not discussed. In response to questions around commercial centres, Mr Lightbody referred to the meeting held with Ngāti Wheke by other reporting officers, but only insofar as noting this had occurred, and not with respect to the meeting traversing the matters on which he was reporting.</p>	This document: see response in previous cell.
47.	Carry out further expert planners' conferencing on the most efficient and effective mechanism to give effect to a low public transport accessibility and / or stormwater-related qualifying matter (as noted in Mr Langman's summary at the residential hearing)	To be provided.
48.	<p>In relation to the Pūtarīngamotu / Riccarton Bush qualifying matter:</p> <ul style="list-style-type: none"> • provide a table explaining the key operative provisions, the provisions proposed through Plan Change 14 as notified (including the error regarding St Teresa's School, noted in Mr Langman's summary for the residential hearing), and the current proposal; and • identify any submitters opposing the qualifying matter whose properties are within the qualifying matter area 	To be provided.
49.	Provide updated sunlight access modelling demonstrating the effect of the proposed qualifying matter planes (compared to MDRS) during lower sun angles in the early morning and late afternoon/evening	To be provided.
50.	<p>In respect of RCAs:</p> <ul style="list-style-type: none"> • Advise on potential merits of a certification pathway • Provide clarity on whether the school site in Lyttelton was part of the character assessment for Lyttelton • Provide 2015 Beca study • What is the history of the arrival of Special Amenity Areas (SAMs)? How many SAMs were there in the previous 1995 District Plan? How did they transition into 	To be provided.

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	<p>the Replacement District Plan, how did it get to that point?</p> <ul style="list-style-type: none"> • Whether the RCA policy was developed specifically in relation to the Beca work in the identification of RCAs, or whether that policy existed in relation to SAMs and had evolved? • Produce information from GIS system to show, as an example, how the list of attributes created were evaluated on the ground • Advise which provisions in the Plan enable consideration of effects of a proposed building / development on a nearby RCA • Advise whether any further information provided through the submission and presentation by Ms Susanne Schade (#241), seeking that Scott Street be recognised as an RCA, leads Ms Rennie (and Ms White) to change her view as to the relief sought. <p>Commissioner McMahon also sought an explanation of why the Englefield RCA (CA15) is not recommended to be removed, notwithstanding that it is surrounded by land proposed to be zoned High-Density Residential. That explanation is set out in Ms White's section 42A report (here), at paragraphs 8.2.26 to 8.2.35, and at paragraph 5 of Ms White's summary statement (here). When questioned by the Panel on 1 November 2023, Ms White confirmed that, if the Englefield RCA had not also substantially overlapped with the Englefield Avonville RHA, she would have recommended removal of the RCA.</p>	
51.	<p>Mr Langman to prepare a table outlining key points raised in Christchurch City Council's submission (#751) addressed in his summary statement, where the relief sought may be contested by other submitters</p>	<p>Provided to Panel Secretariat on 7 November 2023 (link to be added to this table once available).</p>
52.	<p>Ms Blair to consider matters of discretion for design principles and whether the word "<i>includes</i>" should be replaced by "<i>are</i>", and whether it needs to be clearer that some parts are intended to be a guide only</p>	<p>To be provided.</p>
53.	<p>Council planners to prepare updated set of proposed provisions to accompany the Council's reply (and keep track of drafting queries/suggestions of the Panel and origin of any suggested changes (eg witness name, date of questioning, etc))</p>	<p>Updated provisions to be provided with the Council's reply.</p>
54.	<p>Provide link to Greater Christchurch Public Transport Futures Combined Business Case document</p>	<p>The relevant document is here.</p>
55.	<p>Advise on potential refinements to matters of discretion for 4+ unit MDRS developments when located near to centres and/or core public transport routes.</p>	<p>To be provided.</p>
56.	<p>Advise how the Council's preparation of Plan Change 14 has taken into account the principles of Te Tiriti o Waitangi / the Treaty of Waitangi</p>	<p>To be provided.</p>

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57.	Consider whether there are any areas within the airport noise influence area that might warrant a different management approach, due to the suitability of the area otherwise for intensification	To be provided.