

**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
ACCOMPANYING REBUTTAL EVIDENCE**

9 October 2023

BUDDLE FINDLAY

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL:

1. This memorandum of counsel for Christchurch City Council (**Council**) accompanies the rebuttal evidence filed on behalf of the Council.
2. Counsel are grateful for the leave granted by the Independent Hearings Panel (**Panel**) on the terms set out in its Minute 15 dated 4 October 2023.
3. While leave was granted (as initially sought) to file rebuttal from over 40 Council witnesses addressing issues raised in almost 130 statements of evidence filed by submitters, on further review the scope of the Council's rebuttal has narrowed considerably. The 33 witnesses giving rebuttal evidence for the Council, and the submitter witnesses to whose evidence they respond, are listed in the **Appendix**.
4. As signalled in counsel's memorandum of 3 October 2023, it is not yet possible to file the rebuttal evidence of one Council witness, Mr Kleynbos, due to illness. Counsel will file that evidence as soon as possible.

Date: 9 October 2023



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

Appendix A – Rebuttal evidence the Council seeks leave to call

Council witness (including witness number used for primary evidence)	Response to evidence of the following witnesses for submitters
1. Sarah Oliver	<p>Jonathan Clease (Kāinga Ora)</p> <p>Jeremy Phillips (Carter Group Limited)</p> <p>Tim Joll (Kāinga Ora)</p> <p>Andrew Purves (Lyttelton Port Company Limited)</p> <p>Dr Stephen Chiles (Kiwirail Holdings Limited)</p> <p>Dr Stephen Chiles (Waka Kotahi)</p> <p>Catherine Heppelthwaithe (Kiwirail Holdings Limited)</p> <p>Catherine Heppelthwaithe (Waka Kotahi)</p> <p>Anthony O'Donnell (Orion)</p> <p>Darryl Miller (Christchurch International Airport)</p> <p>Natalie Hampson (Christchurch International Airport)</p> <p>Meg Bundle (Environment Canterbury)</p> <p>Fiona Aston (Miles Limited Premises and Equus Trust)</p> <p>John Paul Clarke Barrington and Mr Gjestland (Miles Premises Limited)</p> <p>John Falconer (Waka Kotahi)</p> <p>Matthew Lindenberg (Kāinga Ora)</p> <p>Jonathan Selkiri (Kāinga Ora)</p>
3. Holly Gardiner	<p>Jonathan Clease (Kāinga Ora)</p> <p>Marcus Langman (Christchurch City Council)</p> <p>Fiona Small (Ministry of Justice, Fire and Emergency, Police, St John, Civil Defence and Emergency)</p> <p>Richard Smart (Ministry of Justice, Fire and Emergency, Police, St John, Civil Defence and Emergency)</p> <p>Jeremy Phillips (Carter Group Limited)</p> <p>Jeremy Phillips (Catholic Diocese)</p> <p>Anita Collie (NHL Properties and Wigram Lodge Elizabeth Harris and John Harris and Christchurch Casino)</p>

	<p>David Compton-Moen (Wigram Lodge Elizabeth Harris and John Harris and Christchurch Casino)</p> <p>Richard Turner (Retirement Villages Association and Ryman Healthcare)</p>
4. Kirk Lightbody	<p>Jonathan Clease (Kāinga Ora)</p> <p>Mark Arbuthnot (Lendlease)</p> <p>Vaughan Smith (Scentre)</p> <p>Fraser Colgrave (Kāinga Ora)</p> <p>Adele Radburnd (Christchurch NZ)</p> <p>Shaun Hardcastle (Christchurch NZ)</p>
5. Ike Kleynbos	<p>Pia Jackson (Cashmere Land Developments)</p> <p>Andrew McCarthy (Andrew McCarthy)</p> <p>David Smith (Andrew McCarthy)</p> <p>Helen Bealey (Andrew McCarthy)</p> <p>Jamie Verstappen (Danne Mora)</p> <p>Andrew Mactier (Danne Mora)</p> <p>Ian Thompson (Danne Mora)</p> <p>Jonathan Clease (Kāinga Ora)</p> <p>Sophie Strachan (Kāinga Ora)</p> <p>Tim Joll (Kāinga Ora)</p> <p>Kim Seaton (Kauri Lodge Rest Home)</p> <p>Andrew Mactier (Milns Park)</p> <p>Andrew Mactier (NTP Development)</p> <p>Justin Kean (Scentre)</p> <p>Stephanie Styles (Summerset Group)</p> <p>Clare Dale (Winton Land)</p> <p>Caroline Hutchison (University of Canterbury)</p> <p>Bryan McGillan (Cashmere Park and Hartward Investment)</p> <p>Andrew Hall (LMM Investments)</p> <p>Fraser Colegrave (LMM Investments)</p> <p>Jonathan Clease (LMM Investments)</p>

	<p>Fiona Aston (Red Spur)</p> <p>Samantha Kealey (Scenic Hotel Group)</p>
6. Glenda Dixon	<p>Catherine Boulton (Christs College)</p> <p>John Brown (Kāinga Ora)</p> <p>Tim Joll (Kāinga Ora)</p> <p>Brendan Liggett (Kāinga Ora)</p> <p>Jeremy Phillips (Carter Group Limited)</p> <p>David Compton-Moen (Carter Group Limited)</p> <p>Marcus Langman Christchurch City Council)</p>
7. Suzanne Richmond	<p>Matt Bonis (Cambridge 137)</p> <p>Jonathan Clease (Daresbury Limited)</p> <p>Jonathan Clease (Church Property Trustees)</p> <p>Jeremy Phillips (Carter Group Limited)</p> <p>Jeremy Phillips (Catholic Diocese)</p> <p>Mark Shalders (Daresbury Limited)</p> <p>Marcus Langman (Christchurch City Council)</p>
8. Liz White	<p>Tim Joll (Kāinga Ora)</p>
9. Brittany Ratka	<p>Rebecca Parish (Foodstuffs)</p> <p>Mark Allan (Foodstuffs)</p> <p>Tim Joll (Kāinga Ora)</p> <p>Andrew Purves (Lyttelton Port Company Limited)</p> <p>Jane Whyte (Ravensdown)</p> <p>Richard Chilton (Ravensdown)</p> <p>Emeritus Professor David Norton (Riccarton Bush)</p> <p>Stephanie Styles (Summerset Group)</p> <p>Jeremy Phillips (Carter Group Limited)</p> <p>Jeremy Phillips (Catholic Diocese)</p> <p>Meg Bundle (Environment Canterbury)</p> <p>Mattew Surman (Environment Canterbury)</p>
10. Clare Piper (two statements, one relating to each section 42A)	<p>Shaun Hardcastle (Christchurch NZ)</p> <p>Adele Radburnd (Christchurch NZ)</p> <p>Marcus Langman (Christchurch City Council)</p>

<p>report authored by Ms Piper, concerning Transport (10A) and Specific Purpose Zones (10B) respectively)</p>	<p>Catherine Boulton (Christ's College) Catherine Heppelthwaite (Kiwirail Holdings Limited) Caroline Hutchison (University of Canterbury) Jeremy Phillips (Carter Group) Lisa Williams (Carter Group) David Compton-Moen (Catholic Diocese) Jeremy Phillips (Catholic Diocese) Darryl Millar (Christchurch International Airport) Mark Arbuthnot (Lendlease) John Collyns (Retirement Villages) Prof. Ngaire Kerse (Retirement Villages, Ryman Healthcare) Richard Turner (Retirement Villages, Ryman Healthcare) Matthew Brown (Ryman Healthcare) Catherine Heppelthwaite (Waka Kotahi)</p>
<p>11. Anita Hansbury</p>	<p>Ryan Brosnahan (Holly Lea Village Limited) Sophie Strachan (Kāinga Ora) Jonathan Clease (Kāinga Ora) Fraser Colgrave (Kāinga Ora) Matthew Bonis (Woolworths) Stephanie Styles, planning for Summerset Group Holdings Ltd Julie Comfort (Sutherlands Estate, Benrogan Estates, Knights Stream Park Ltd, Dann Mora Ltd, Davie Lovell-Smith Ltd, Milns Park Ltd)</p>
<p>12. Ian Bayliss</p>	<p>Jonathan Clease (Kāinga Ora) Bryan McGillan (Cashmere Park Limited and Hartward Investment Trust) Pia Jackson (Cashmere Land Developments Limited) Andrew Mactier (Danne Mora) Andrew Mactier (Milns Park)</p>
<p>16. Clara Caponi</p>	<p>David Hill (Carter Group Limited)</p>

	<p>William Fulton (Carter Group Limited)</p> <p>Kyle Brookland (Carter Group Limited)</p> <p>Tom Chatterton (Carter Group Limited)</p> <p>Peter Eggleton (Church Property Trustees)</p> <p>Peter Carney (Church Property Trustees)</p>
20. William Field	Lisa Williams (Carter Group Limited)
24. Phil Griffiths	Peter Eggleton (Church Property Trustees)
25. David Hattam	<p>Jonathan Clease (Kāinga Ora)</p> <p>Richard Turner (Retirement Villages Association and Ryman Healthcare)</p>
27. Tim Heath	<p>Fraser Colegrave (Kāinga Ora)</p> <p>Natalie Hampson (Christchurch International Airport)</p> <p>Matthew Bonis (Woolworths)</p> <p>Clare Dale (Winton Land)</p> <p>Mark Arbuthnot (Lendlease)</p> <p>Doug Fairgray (Scentre)</p>
29. Anne Heins	Shaun Hardcastle (Christchurch NZ)
30. Dr Wendy Hoddinott	<p>Sophie Strachan (Kāinga Ora)</p> <p>Kim Seaton (Kauri Lodge Rest Home)</p>
31. Stephen Hogg	<p>Keeley Pomeroy (Cambridge 137 Limited)</p> <p>Brett Gilmore (Cambridge 137 Limited)</p> <p>Brett Gilmore (Daresbury Limited).</p>
32. Tim Holmes	<p>David Hill (Carter Group Limited)</p> <p>Kyle Brookland (Carter Group Limited)</p> <p>William Fulton (Carter Group Limited)</p> <p>Tom Chatterton (Carter Group Limited)</p>
37. Amanda Mackay	<p>David Compton-Moen (Carter Group Limited)</p> <p>Jeremy Phillips (Carter Group Limited)</p>
38. Michele McDonald	<p>Andrew McCarthy (Andrew McCarthy)</p> <p>Andrew Hall (LMM Investments 2012 Limited)</p>
39. Dr Ann McEwan	<p>John Brown (Kāinga Ora)</p> <p>Tim Joll (Kāinga Ora)</p>

	Jeremy Phillips (Carter Group Limited) Catherine Boulton (Christ's College)
44. Brian Norton	Matthew Surman (Canterbury Regional Council) Stephanie Styles (Summerset Group Holdings)
45. Amanda Ohs	John Brown (Cambridge 137 Limited) Matt Bonis (Cambridge 137 Limited) David Hill (Carter Group Limited) Dave Compton-Moen (Carter Group Limited) Jeremy Phillips (Carter Group Limited) Jonathan Clease (Daresbury Limited) Jonathan Clease for (Church Property Trustees)
46. Phil Osborne	Fraser Colegrave (Kāinga Ora) Douglas Fairgray (Scentre) Tim Joll (Kāinga Ora)
47. Dave Pearson	Matthew Bonis (Cambridge 137 Limited) John Brown (Cambridge 137 Limited) Brett Gilmore (Cambridge 137 Limited)
48. Alistair Ray	David Compton-Moen (Carter Group Limited) Hugh Nicholson (Atlas Quarter Residents Group) Jonathan Clease (Kāinga Ora)
51. Chris Rossiter	Lisa Williams (Carter Group Limited) Richard Turner (Ryman Healthcare and Retirement Villages Association)
53. Gavin Stanley	Stewart Harrison (Daresbury Limited) Tom Chatterton (Carter Group Limited) Keely Pomeroy (Cambridge 137 Limited)
54. Chessa Stevens	Peter Carney (Church Property Trustees) Jonathan Clease (Church Property Trustees)
58. Nicola Williams	Jonathan Clease (Kāinga Ora)
61. John Thornton	Rebecca Parish (Foodstuffs)