

30 November 2023

Christchurch City Council

PO Box 73012

Christchurch 8154

By e-mail: [jo.daly@chch2023.govt.nz](mailto:jo.daly@chch2023.govt.nz)

Dear Jo,

**RE: HEARING STATEMENT ON PLAN CHANGE 14 (INTENSIFICATION) TO THE CHRISTCHURCH DISTRICT PLAN**

**1. INTRODUCTION**

1.1 This Hearing Statement has been prepared on behalf of bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (the Fuel Companies) and represents their views. It is not expert evidence. As advised in the email to Jo Daly, Director of the Secretariat for the Independent Hearings Panel, from Jarrod Dixon dated 15<sup>th</sup> November (Attachment 1), the Fuel Companies (submitter 372) will not be attending the hearing but ask that this Hearing Statement be tabled before the Panel.

**2. THE FUEL COMPANIES SUBMISSION AND POSITION**

2.1 The Fuel Companies made submissions on several chapters proposed to be amended by Plan Change 14 (*PC14*) to the Christchurch District Plan (*PDP*). The Fuel Companies' submission points and position on Council's Section 42A (s42a) recommendations are set out in the following paragraphs.

2.2 **Chapter 5 Natural Hazards:** The Fuel Companies sought clarity that phrase 'intensification of any site' in Clause (a) of Policy 5.2.2.5.1 only relates to higher density residential activities (i.e. not new developments associated with non-residential activities) and that Clause (b) applies to all buildings rather than just those associated with residential activities or residential intensification. The s42a recommendation is to accept the Fuel Companies by amending the wording to 'residential intensification' in all objectives, policies and rules. The Fuel Companies support this approach.

2.3 **Chapter 6 General Rules (Sub-chapter 6.5 Scheduled Activities):** The Fuel Companies sought these provisions be retained as notified, noting that only minor changes were proposed to reflect the updated naming of the residential zones. The Fuel Companies support the s42a recommendation to retain these provisions as notified.

2.4 **Chapter 8 Subdivision, Development and Earthworks:** The Fuel Companies sought clarification that Rule 8.9A (Development and Activities in Wastewater Constraint Areas) or, specifically, the 'expansion of activities' in this overlay (where several service stations are located) only captures activities which involve increasing the volume of wastewater rather than general maintenance or upgrades to existing activities. The requested clarity was provided in the s42a recommendation that the rule only captures activities that increase the volume of wastewater. This is supported by the Fuel Companies.

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- 2.5 **Chapter 14 Residential:** The Fuel Companies sought various changes to the proposed/amended policies, residential design principles and matters of discretion for residential activities in the residential chapter to provide direction for the management of reverse sensitivity effects on existing lawfully established non-residential activities. The S42a recommendation was to accept the requested inclusion in the relevant policies and matters of discretion but not the residential design principles. The Fuel Companies accept and support the reasoning provided in the s42a recommendation.
- 2.6 The Fuel Companies also sought amendments to proposed Objective 14.2.12 and Policy 14.2.12.1 to acknowledge that reverse sensitivity effects can occur between residential activities and lawfully established industrial activities on non-industrial zone sites in addition to those in industrial zones. The s42a recommendation was to reject the Fuel Companies submission point on the basis this objective and policy only applies to residential activities located in the Industrial Interface Qualifying Matter. The Fuel Companies accept the reasoning and amended wording in the s42a recommendation.

### 3. CONCLUDING STATEMENT

- 3.1 Thank you for your time and acknowledgement of the issues raised in the Fuel Companies' submission. Please do not hesitate to contact the writer on 021 948 073 should you wish to clarify any matters addressed herein.

Kind Regards,



**Jarrod Dixon**

Senior Planner

**SLR Consulting**



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**Attachment 1 – Correspondence with Director of the Secretariat for the Independent Hearings Panel**



**From:** [Jarrod Dixon](#)  
**To:** [Jo Daly](#)  
**Cc:** [Jackson, Andrew](#); [Stevenson, Mark](#)  
**Subject:** RE: PC14 Update - 21 August 2023  
**Date:** Wednesday, 15 November 2023 11:25:00 am  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.jpg](#)  
[image004.jpg](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.jpg](#)

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Hi Jo,

Further to my email below, you may have noticed my contact details have changed (4sight is now fully integrated with SLR).

May I request my contact detail be updated in your system and that you also include Miles Rowe for future correspondence.

Miles Rowe, Principal Planner  
[Miles.Rowe@slrconsulting.com](mailto:Miles.Rowe@slrconsulting.com)  
027 276 2532

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**From:** Jarrod Dixon <[jarrod.dixon@slrconsulting.com](mailto:jarrod.dixon@slrconsulting.com)>  
**Sent:** Wednesday, November 15, 2023 11:20 AM  
**To:** Jo Daly <[jo.daly@chch2023.ihp.govt.nz](mailto:jo.daly@chch2023.ihp.govt.nz)>  
**Cc:** Jackson, Andrew <[Andrew.Jackson@ccc.govt.nz](mailto:Andrew.Jackson@ccc.govt.nz)>; Stevenson, Mark <[Mark.Stevenson@ccc.govt.nz](mailto:Mark.Stevenson@ccc.govt.nz)>  
**Subject:** RE: PC14 Update - 21 August 2023

Hi Jo,

Thanks for the discussion the other day.

We have reviewed the relevant Council evidence and s42a recommendations on behalf of the Fuel Companies and can confirm that we are in generally in support of the recommendations. Therefore, we will not be preparing evidence or need to speak at the hearings. Instead, we will be preparing a brief hearing statement in support of the recommendations that we request be circulated to the panel for consideration when undertaking their decisions.

I understand from our discussion that there is no strict deadline on submitting this statement, but we will endeavour to complete this by the end of next week (Friday 24<sup>th</sup> November).

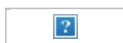
I trust the above aligns with our discussion the other day but please let me know if you have any queries or concerns.

## Jarrold Dixon

Senior Planner - Planning

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**From:** Jarrod Dixon  
**Sent:** Tuesday, November 7, 2023 4:36 PM  
**To:** Stevenson, Mark <[Mark.Stevenson@ccc.govt.nz](mailto:Mark.Stevenson@ccc.govt.nz)>; Jo Daly <[jo.daly@chch2023.ihp.govt.nz](mailto:jo.daly@chch2023.ihp.govt.nz)>

**Cc:** Jackson, Andrew <[Andrew.Jackson@ccc.govt.nz](mailto:Andrew.Jackson@ccc.govt.nz)>

**Subject:** RE: PC14 Update - 21 August 2023

Hi Mark,

Thanks for your email.

[@Jo Daly](#) could you please give me a call on my number below when you are free to discuss. Just want to make sure I fully understand what is needed.

Thanks in advance.

Ngā mihi

Jarrold Dixon

Senior Planner

021 948 073



**The final stage in our journey to become #oneteam with SLR is just on the horizon – watch this space**

201 Victoria Street West, Auckland Central 1010

PO Box 911 310, Victoria St West, Auckland 1142

[4Sight.Consulting](#)

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**From:** Stevenson, Mark <[Mark.Stevenson@ccc.govt.nz](mailto:Mark.Stevenson@ccc.govt.nz)>

**Sent:** Tuesday, November 7, 2023 2:56 PM

**To:** Jarrod Dixon <[jarrod.dixon@4sight.co.nz](mailto:jarrod.dixon@4sight.co.nz)>

**Cc:** Jackson, Andrew <[Andrew.Jackson@ccc.govt.nz](mailto:Andrew.Jackson@ccc.govt.nz)>; Jo Daly <[jo.daly@chch2023.ihp.govt.nz](mailto:jo.daly@chch2023.ihp.govt.nz)>

**Subject:** RE: PC14 Update - 21 August 2023

You don't often get email from [mark.stevenson@ccc.govt.nz](mailto:mark.stevenson@ccc.govt.nz). [Learn why this is important](#)

Hi Jarrod

Thank you for your email.

The Independent Hearings Panel website here <https://chch2023.ihp.govt.nz/> provides information on the hearings incl. the following –

Hearings schedule

<https://chch2023.ihp.govt.nz/assets/IHP-Other-Docs-23-and-24-August/IHP-Public-Hearing-Schedule-Week-5-at-3-November-2023.pdf>

Hearings Procedures

<https://chch2023.ihp.govt.nz/assets/Uploads/IHP-Hearing-Procedures-UPDATE-FINAL-23-August-2023.pdf>

A hearing statement can be prepared and presented as per para. 63 of the Hearings Procedures.

I have copied in Jo Daly, Director of the secretariat for the Independent Hearings Panel who can advise further and you can arrange a time to speak to the IHP,

Thanks

## Mark Stevenson

Manager Planning



03 941 5583



Mark.Stevenson@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73012, Christchurch 8154



ccc.govt.nz



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**From:** Jarrod Dixon <[jarrod.dixon@4sight.co.nz](mailto:jarrod.dixon@4sight.co.nz)>

**Sent:** Monday, November 6, 2023 4:13 PM

**To:** Jackson, Andrew <[Andrew.Jackson@ccc.govt.nz](mailto:Andrew.Jackson@ccc.govt.nz)>

**Subject:** RE: PC14 Update - 21 August 2023

You don't often get email from [jarrod.dixon@4sight.co.nz](mailto:jarrod.dixon@4sight.co.nz). [Learn why this is important](#)

Hi Andrew,

I hope you are well.

I prepared the submission on behalf of the Fuel Companies for PC14 and received the below email on 21 August. It appears that I inadvertently missed the part where the s42a reports had been released and therefore have not actioned anything further (I did not receive any other email correspondence so assume this email was intended to notify submitters that the s42a reports had been released). I now understand that the deadline for evidence has expired and hearings are progressing.

Can you please confirm if it would be possible for me to prepare a brief [hearing statement](#) on behalf of the Fuel Companies for the Panel to consider? The statement will set out the Fuel Companies positions on the s42a recommendations and would not need to be presented at the hearings (therefore doesn't need to be factored into the hearings schedule).

Feel free to give me a call on my number below if you want to discuss. Look forward to hearing from you soon.

Ngā mihi

Jarrod Dixon

Senior Planner

021 948 073



**The final stage in our journey to become #oneteam with SLR is just on the horizon – watch this space**

201 Victoria Street West, Auckland Central 1010

PO Box 911 310, Victoria St West, Auckland 1142

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**From:** Jackson, Andrew <[Andrew.Jackson@ccc.govt.nz](mailto:Andrew.Jackson@ccc.govt.nz)>

**Sent:** Monday, August 21, 2023 4:07 PM

**To:** INPC Business Support <[INPCBusinessSupport@ccc.govt.nz](mailto:INPCBusinessSupport@ccc.govt.nz)>

**Subject:** PC14 Update - 21 August 2023

Kia ora

On 18 August 2023 Council filed a [Memorandum of counsel](#) addressing the following -

- a. the Plan Change 14 (PC14) provisions, updated to reflect recommendations made by the Council's section 42A report authors; and
- b. further errors identified in the Summary of Submissions received on PC14 dated 30 June 2023 (Summary).

With regard to (a), updated [PC 14 provisions](#) to reflect the recommendations made by section 42A report authors are now on the IHP website.

If there is any matter for which clarification is sought, please contact Council by email to Cedric Carranceja ([cedric.carranceja@buddlefindlay.com](mailto:cedric.carranceja@buddlefindlay.com)), David Randal ([david.randal@buddlefindlay.com](mailto:david.randal@buddlefindlay.com)) and Mark Stevenson ([mark.stevenson@ccc.govt.nz](mailto:mark.stevenson@ccc.govt.nz))

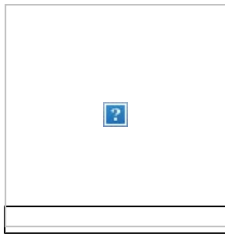
A separate email / letter will be sent this Wednesday with notice that further submissions are invited on 3 submissions as referred to under (b) in the memorandum above.

Ngā mihi  
Andrew

**Andrew Jackson**  
Senior Planning Support Officer

Development Support Team

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