

**BEFORE AN INDEPENDENT HEARINGS PANEL
IN CHRISTCHURCH**

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

UNDER the Resource Management Act 1991 (the **RMA**)

AND

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

**STATEMENT OF REBUTTAL EVIDENCE OF BRITTANY OLIVIA RATKA ON
BEHALF OF CHRISTCHURCH CITY COUNCIL**

**INDUSTRIAL INTERFACE, SIGNIFICANT AND OTHER TREES, AND NATURAL
HAZARDS QUALIFYING MATTERS**

Dated: 9 October 2023

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EXECUTIVE SUMMARY

1. I have considered submitters' evidence provided on the Industrial Interface, Significant and Other Trees, and Natural Hazards Qualifying Matters (**QMs**).
2. This rebuttal evidence responds to the following issues:
 - (a) request to have the protection removed for trees T1118, T12 and T13;
 - (b) the need for the Industrial Interface QM and its scope;
 - (c) the tree protection zone radius over the Significant Tree Area at Riccarton Bush/Pūtaringamotu;
 - (d) natural hazards / waterbody setback in relation to a drain at the Summerset Cavendish Village site;
 - (e) the need for the Significant and Other Trees QM; and
 - (f) requests to restrict intensification within the Halswell catchment.
3. For the reasons discussed below I maintain my position as set out in my Section 42A report in respect of each of the above issues, except that I agree:
 - (a) The setback in relation to a drain at the Summerset Cavendish Village can be removed because the waterbody no longer exists;
 - (b) Should the Panel be minded to allow for greater intensification adjoining Riccarton Bush I agree with Professor Norton's and Mr Benson's recommendation of a 15m setback for buildings and earthworks from the predator proof fence for the Riccarton Bush Significant Trees Area; and
 - (c) In relation to the Industrial Interface, that there could be merit in pursuing an air discharge buffer from the Ravensdown site if the Panel considers that enabling high density residential development opposite the Ravensdown operations would result in undue health and safety and amenity effects on occupants.

INTRODUCTION

4. My full name is **Brittany Olivia Ratka**. I am a Policy Planner in the City Planning Team, Strategy and Transformation Group of the Christchurch City Council (the **Council**). I have been in this position since 16 December 2021.
5. I prepared a planning officer's report pursuant to section 42A of the Resource Management Act 1991 (the **Act / RMA**) dated 11 August 2023 (**Section 42A Report**). My Section 42A Report considered the issues raised by submissions and further submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**), and made recommendations in response to the issues that emerged from those submissions, as they applied to the Industrial Interface QM, the Significant and Other Trees QM, and the Natural Hazards QMs.
6. I have the qualifications and experience set out at paragraphs 2.1.2 and 2.1.3 of my Section 42A report. I repeat the confirmation given in my Section 42A Report that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

SCOPE OF REBUTTAL EVIDENCE

7. In preparing this rebuttal statement, I have read and considered the evidence filed on behalf of submitters, as that evidence relates to my Section 42A Report. In this evidence I respond to the following witnesses:
 - (a) Rebecca Parish – Foodstuffs;
 - (b) Tim Joll – Kāinga Ora;
 - (c) Jane Whyte – Ravensdown Limited;
 - (d) Richard Chilton – Ravensdown Limited;
 - (e) David Norton – Riccarton Bush Trust;
 - (f) Stephanie Styles – Summerset Group Holdings Limited;
 - (g) Jeremy Phillips – Carter Group Limited;
 - (h) Jeremy Phillips – Catholic Diocese of Christchurch;
 - (i) Meg Buddle – Environment Canterbury; and

(j) Matthew Surman – Environment Canterbury.

8. Where I am relying on the primary evidence or rebuttal evidence of technical witnesses for the Council, I make that clear in this rebuttal evidence.

FOODSTUFFS (S705) – SIGNIFICANT TREE T1118

9. I have considered the Foodstuffs evidence,¹ prepared by Ms Parish, which indicates that during the 2015 District Plan Review, Council and Foodstuffs agreed that Significant Tree T1118 should be removed from being protected in the District Plan. Both Foodstuffs and Council had a supporting arborist report. Foodstuffs did not attend the relevant mediation session and the tree remained in the District Plan. Foodstuffs outline that its position has not changed and it remains strongly opposed to the inclusion of the tree on the grounds of potential risk to public safety and property.
10. With respect to the scheduling of trees with heritage value, the Exceptional Evaluation CTEM Score must be achieved and, as part of this, the tree must meet the CTEM thresholds for health and structure.
11. Council Arborist John Thornton has prepared rebuttal evidence including an assessment on the health and structure of the tree. With respect to the CETM thresholds, he has rated the tree's Health as being 'Fair', and the Structure as being 'Fair' as well, noting that some limbs are effectively largely deadwood and need removing. Should these limbs be removed he would rate the Structure as being 'Fair to Good'.
12. Based on the above assessment, I consider T1118 should remain in the significant tree schedule as a proposed QM tree. The proposed PC14 changes to subchapter 9.4 would mean that for scheduled trees that are not QM trees, there is no protection from residential development in the Medium Density Residential Zone (**MRZ**) and High Density Residential Zone (**HRZ**). However, there are no exceptions for commercial development, such as the commercially zoned Stanmore Road site containing T1118. So even if T1118 were removed as a QM tree the 9.4 protection rules would prevail.
13. It appears that Foodstuffs is seeking that the protection for this tree be removed in its entirety (i.e., from the schedule itself, rather than just excluding it as a QM tree). In my view it is questionable whether PC14 is the

¹ Foodstuffs #705 #2057 - Evidence Rebecca Parish – Company, paragraphs 19 - 22

appropriate avenue to consider the removal of any trees from the District Plan significant tree schedule, as opposed to a separate plan change process.

KĀINGA ORA (S834, FS2082) – INDUSTRIAL INTERFACE

Demand for industrial land

14. The evidence² of Mr Joll, on behalf of Kāinga Ora, questions the need for the Industrial Interface QM to ensure sufficient industrial land remains available to meet expected demand. He outlines that the amount of land zoned and available for industrial uses will not change because of residential intensification in residential zones. He also comments that Council's Housing and Business Capacity Assessments have identified a substantial surplus of industrial zoned land, and that my Section 42A Report on the appropriateness of the QM relating to s771(i) and s770(i) appears inconsistent with Council's position on the proposed rezoning of currently Industrial General zoned (**IGZ**) areas in Sydenham and Philipstown to a Commercial Mixed Use Zone, which allows multi-storey residential activities within industrial areas.
15. Within the industrial areas adjoining residential zones, having regard to the land being used for industrial and other activities, I consider that there is a level of demand being met in these locations that warrants its protection. There are 3221 total parcels in industrial-zoned land adjacent to residential zoned land, and of these, 400 sites are vacant. In my view there is no demonstrated evidence that the industrial land adjoining the QM area is unsuitable for industrial use (as per test in the National Policy Statement on Urban Development in determining capacity). Any determination that land is inappropriate for industrial use and should be rezoned/enabled for alternative uses is best considered through a strategic planning exercise, in my view.

Reverse sensitivity effects

16. Mr Joll questions whether the Industrial Interface QM is necessary to ensure residential development does not create reverse sensitivity effects on permitted or consented activities within the adjoining industrial zoned land.

² Kāinga Ora Homes and Communities #834 #2082 #2099 - Evidence Tim Joll – Planning, paragraphs 8.0 – 8.23

Nature of activities in industrial zones

17. He comments that the industrial areas at the interface have had to maintain an appropriate level of effect commensurate with having residential neighbours for many decades.
18. His evidence sets out that the interface relates to the interface of IGZ areas and residential areas. However, I note this QM also includes residential areas adjoining Industrial Park Zones, as well as Industrial Heavy Zones (**IHZs**), such as that at 312 Main South Road.
19. Mr Joll comments that the existing environment within IGZs adjoining residential zones comprises a mix of either benign industrial activities or commercial activities, and does not consider the Industrial Interface QM can be justified in terms of 771(i) of the RMA.
20. With respect to the activities anticipated by the Plan in the IGZ zone, I note existing *Policy 16.2.1.3 Range of industrial uses*, recognises and provides for industrial and other compatible activities within this zone. Whilst there are a variety of existing activities within IGZ as outlined by Mr Joll's examples in his evidence, I consider that the current use of properties within industrial zones for non-industrial activities does not preclude 'industrial' activities being established in the future as anticipated by the Plan.
21. Furthermore, potentially many of the case study examples mentioned in Mr Joll's evidence, such as small-scale manufacturing or warehousing, trade or yard-based supply activities, and mechanics, would undertake noise generating activities. For instance, the use of hand-held equipment, forklifts and heavy vehicle movements. Mr Trevathan's report³ outlines in detail the types of activities permitted within industrial zones and the typical noise sources. The industrial zones in the Plan have a higher noise limit than for other zones, and although these limits are more enabling, where noise is received within residential zones the residential noise limits apply. Enabling greater residential building heights could impact these existing activities in industrial zones given the measurement of noise above each floor level, with additional floor levels exposed to noise, and with less, if any screening.

Noise rules

³ Appendix 39 to the Part 2 Qualifying Matters s32 report – section 3

22. Mr Joll considers that the compliance requirement is unchanged as adjoining industrial activities need to meet residential standards at the zone boundary. I do not agree with this as Rule 6.1.4.1 – Measurement and assessment of noise states ‘*unless otherwise specified elsewhere in this District Plan, noise shall be measured in accordance with NZS 6801:2008 “Acoustics – Measurement of environmental sound”, and assessed in accordance with NZS 6802:2008 “Acoustics-Environmental noise”*’.
23. NZS6802:2008 requires that the noise source is measured at 1.2 – 1.5 metres above ground level over the entire outdoor area of the receiving site (i.e. including right up to the common boundary), and at 1.2 – 1.5 metres above the ‘floor level of interest’. In the case of a three-level dwelling, the floor level of interest would include the third level, hence the QM seeks reduced building heights within a buffer from industrial zones.

Residential activities within Commercial Mixed Use Zones

24. Mr Joll also questions a possible inconsistency of restricting residential building height adjoining industrial zones while allowing for residential activities and industrial activities within the same zone, in the case of the proposed Mixed Use Zoning.
25. As set out above, the enablement of three or more storeys at the interface of industrial zones will create a new compliance location where noise is measured in accordance with the residential noise limits in the District Plan. The Mixed Use Zone is considered a commercial zone and therefore the commercial zone noise limits would apply, rather than the residential noise limits.

Interface adjoining existing Medium Density Zone

26. Mr Joll’s evidence also details that three-storey residential developments in the existing Residential Medium Density Zone (**RMDZ**) are already permitted adjoining industrial zones and he is not aware of any reverse sensitivity issues (referring to the summary of noise complaints in Dr Trevathan’s memorandum⁴).
27. I am mindful that the proposed Industrial Interface QM would be more restrictive than the current District Plan enablement for three storey

⁴ Appendix 39 to the Part 2 Qualifying Matters s32 report.

residential development within the RMDZ and this is not traversed in my s42A Report. I understand there is a legal issue for the Panel to consider as to whether an intensification planning instrument is able to restrict status quo development rights. I note that whilst there are properties zoned RMDZ at the interface I am not aware of any existing three storey development at this interface within the RMDZ.

Compliance with noise limits

28. Mr Joll comments that in considering Dr Trevathan's memorandum further, it appears that the key issue is not one of reverse sensitivity but more of industrial activities not complying with the noise limits.
29. As discussed above, the increased enablement in residential building heights creates a new compliance location for noise as this is measured at each floor level of interest. The QM does not change the existing noise controls in the Plan and does not make the industrial controls more permissive.

Modelling

30. Mr Joll also questions the 40m buffer being based on modelling of a single-storey dwelling, which was the most conservative of the scenarios tested, and with numerous circumstances where this issue would not arise in terms of noise exposure. He also comments that two-storey units are already permitted in Residential Suburban (**RS**) and Residential Suburban Density Transition (**RSDT**) zones and three storeys in RMDZs, so this modelling did not consider what is currently permitted by the District Plan.
31. As set out in Dr Trevathan's memorandum,⁵ as dwelling height increases, industrial sources are less likely to benefit from screening provided by intervening structures. The level of screening and distance to the noise source impacts the level of noise received within the adjoining residential areas. The existing interface with industrial zones has a varying extent of screening in some cases there are intervening buildings or fencing, or both, and in others there is no screening. The modelled scenarios show that where there is no screening at all between a noise source and dwelling, an increase in height to third storey makes no difference, however when there is screening to the ground floor and potentially the first floor, this results in an elevated noise area at the second floor/third storey. The 40m buffer captures

⁵ Appendix 40 to the Part 2 Qualifying Matters s32 report.

most scenarios (i.e., from no screening, to screening for ground and first floors) and as demonstrated by the modelling these scenarios are realistic. I note the QM does not seek to include any restrictions on single storey or two storey development, only from the third storey and above.

RAVENSDown LIMITED (S243) - INDUSTRIAL INTERFACE

32. Ravensdown Limited has provided planning⁶ and specialist⁷ evidence, from Ms Whyte and Mr Chilton respectively, in support of updating the Industrial Interface QM to include consideration of air discharge related reverse sensitivity effects at the Ravensdown site at 312 Main South Road, and related changes to zoning, provisions and buffer size.
33. The lack of separation between the Industrial Heavy zoned Ravensdown site and the proposed HRZ, and the potential impact on the Ravensdown operation, is the key concern outlined in their evidence. Mr Chilton sets out that Ravensdown's operations at the site discharge sulphur dioxide (SO₂) and fluoride, which occur primarily from two tall discharge stacks. With respect to enabling HRZ across the road, he considers that contaminant concentrations at heights up to 4-storeys are unlikely to have a significant impact, but above that height the concentrations increase markedly, to the extent that they would likely impact on Ravensdown's ability to manage its off-site air quality effects to an acceptable level.

Changes to objective and policy

34. Ms Whyte considers it is appropriate that proposed Objective 14.2.12 recognise a wider range of potential interface effects and not focus on solely on noise. She also seeks a change to Policy 14.2.12.1 as the word 'significant' creates too high a threshold, particularly for health effects. She does not consider the addition of the word 'significant' is necessary to provide acknowledgement that some noise effects are anticipated, and considers that the wording of "*restrict*" is capable of being implemented effectively in relation to adverse effects. She suggests the changes below (in red):

⁶ Ravensdown Limited #243 - Evidence Jane Whyte – Planning.

⁷ Ravensdown Limited #243 - Evidence Richard Chilton – Air Quality.

14.2.12 Objective – Compatibility with Industrial activities

a. New residential development is not adversely affected by effects noise generated from industrial activities and the development does not affect the operation of industrial activities within industrial zones.

14.2.12.1 Policy – Managing effects on industrial activities

a. Restrict new residential development of three or more storeys within proximity to industrial zoned sites where it would give rise to reverse sensitivity effects on industrial activities and/or significantly adversely affect the amenity health and safety of residents, unless mitigation sufficiently addresses the effects.

35. I do not support the abovementioned changes to the proposed objective and policy. Should the Panel be minded to accept an air discharge QM buffering the Ravensdown site I consider this would be best managed with a new objective and policy specific to this issue of air discharge.

Inadequate buffer distance and zoning of adjoining residential area

36. Ms Whyte seeks that the 40m buffer be extended to 240m and provides a s32AA assessment in her evidence. Ravensdown's submission requested that the zoning of the residential land opposite its site on Main South Road be changed from HRZ to MRZ. Ms Whyte considers that, provided the extent of the interface area is increased as Ravensdown has requested, then what residential zoning applies to the land takes on less importance.
37. Given time constraints I have not obtained a specialist peer review of the air discharge evidence of Mr Chilton. The discharge consent CRC080001 contains numerous conditions related to emissions. Of note is condition 2 which states '*The discharges shall not cause odour or particulate matter, which is offensive or objectionable, beyond the boundary of the property on which the consent is exercised.*' While the condition does not, on its face, depend on the level of development beyond the boundary, practically, there is a greater likelihood of enforcement where there are more people present and in locations (including heights) that are more likely to experience a discharge as being offensive/objectionable. Therefore, if the building heights increase and the number of people increase in the area there is more likelihood that Ravensdown may become non-compliant with their consent.

38. In my view there could be merit in pursuing an air discharge buffer, restricting intensification, should the Panel be satisfied that enabling high density residential development opposite the Ravensdown operations would result in undue health, safety and amenity effects on occupants of the enabled high density development, and reverse sensitivity effects on the heavy industrial activity.

RICCARTON BUSH TRUST (S44, FS2085) – MEASUREMENT OF TREE PROTECTION ZONE

39. I have considered the evidence⁸ of David Norton, Emeritus Professor at Te Kura Ngahere (School of Forestry) at the University of Canterbury, for the Riccarton Bush Trust. This evidence relates to the applicability of the proposed tree protection zone radius over the Significant Tree Area at Riccarton Bush/Pūtaringamotu.
40. Professor Norton comments that higher density housing on the margins of Pūtaringamotu will have a number of adverse impacts on the forest ecosystem and its species including through damage to tree root systems, loss of greenspace, microclimate effects, increased fire risk and reverse sensitivity effects. He considers that ecologically the only logical definition of a tree protection zone for Pūtaringamotu is the predator-proof fence as Pūtaringamotu is a single ecological entity, rather than just individual kahikatea trees. In his view a minimum building setback of 22 m (the average height of kahikatea trees in Pūtaringamotu), with a minimum earthworks setback of 15 m to protect tree root systems, is appropriate. He considers that both setbacks should be from the predator proof fence which marks the ecological boundary of Pūtaringamotu.
41. On the 2nd of October 2023, Professor Norton and Mr Benson undertook expert conferencing and agreed to the following in the joint witness statement: *"the simplest approach to ascribing a setback from Riccarton Bush is to establish a setback from the predator-proof fence; and that setback should be 15 metres."*
42. My Section 42A Report includes recommendations with two scenarios.
- (a) Where the Riccarton Bush QM and extended Airport Noise Contours are retained I recommend that the current District Plan controls for

⁸ Riccarton Bush Trust #44 #2085 - Evidence Emeritus Professor David Norton

Rule 9.4.4.1.3 RD6 remain (i.e. 10m setback from predator proof fence).

(b) Should the Panel be minded to recommend greater intensification adjoining Riccarton Bush I recommended the tree protection zone radius be used, and the setback from the predator proof fence requirement be removed.

43. My substantive recommendation is the same having reviewed this evidence. However, should the Panel be minded to allow for greater intensification adjoining Riccarton Bush I agree with Professor Norton's and Mr Benson's recommendation of a 15m setback for buildings and earthworks from the predator proof fence.

SUMMERSET GROUP HOLDINGS LIMITED (S443) - NATURAL HAZARDS / WATERBODY SETBACK

44. The evidence⁹ of Ms Styles on behalf of Summerset Group Holdings Limited outlines that there are conflicting section 42A report recommendations regarding the drain at the Summerset Cavendish Village site that no longer exists due to development of the retirement village. The recommendation in Ms Anita Hansbury's section 42A Report is to accept the removal of the waterbody and hazard QMs, whereas my Section 42A Report rejects this recommendation as does the evidence of Mr Brian Norton, Council's Senior Stormwater Planning Engineer. Given that the waterbody does not exist I do not have any concerns with the removal of this QM. Mr Norton's rebuttal evidence also agrees the waterbody setback overlay should be removed from the planning maps.

CARTER GROUP LIMITED (S814, S2045) - SIGNIFICANT AND OTHER TREES

45. Mr Phillips' evidence¹⁰ for the Carter Group comments on Carter Group's submission request to remove the protection for Significant Trees T12 and T13 at 32 Armagh Street. Should the trees' protection remain, he considers it is appropriate that further consideration of their removal be provided for by Policy 9.4.2.2.7 which provides guidance for the felling of scheduled trees. As worded, that policy only refers to 'significant trees', not 'qualifying matter

⁹ Summerset Group Holdings Limited #443 #2097 #2022 - Evidence Stephanie Styles – Planning, paragraphs 7.25 – 7.30.

¹⁰ Carter Group Limited #814 #824 #2045 - Evidence of Jeremy Phillips – Planning, paragraphs 123 – 125.

trees' and therefore considers it should be amended to refer to 'the felling of significant or qualifying matter trees'.

46. I do not have any concerns with this suggestion to update Policy 9.4.2.2.7, though I do not think it is completely necessary as qualifying matter trees are captured as 'significant trees' in the policy in any case.
47. Mr Phillips' evidence¹¹ also raises the concern that the Significant and Other Trees QM is duplication of the existing provisions in the District Plan. He comments that the operative provisions manage all works in the margins of scheduled trees irrespective of height or density and prevent the removal of scheduled trees. Mr Phillips does not therefore agree with the reasoning provided for including the new QM and considers there is no need for a specific QM for this matter. He questions why a distinction is needed given the protection to trees afforded by existing provisions in chapter 9.4 of the District Plan, and is not clear on what the implications are of a tree being classified as a QM tree.
48. I note that unless proposed as a QM, the operative provisions cannot be used to limit intensification in line with MDRS and Policy 3. The Significant and Other Trees QM identifies trees that are already scheduled in the District Plan which meet the threshold for protection as a QM. There are several trees in the schedule which are not QM trees, as either they did not meet the updated CTEM assessment criteria, or they are not within areas to be intensified, such as Banks Peninsula or rural zones.

CATHOLIC DIOCESE OF CHRISTCHURCH (S823, FS2044) - SIGNIFICANT AND OTHER TREES

49. The evidence¹² of Mr Phillips, on behalf of the Catholic Diocese, raises concerns that the Significant and Other Trees QM duplicates the existing provisions in the District Plan. My response to the Carter Group's evidence on this matter as set out above is equally applicable here.

¹¹ Carter Group Limited #814 #824 #2045 - Evidence of Jeremy Phillips – Planning, paragraphs 29 – 33.

¹² Catholic Diocese of Christchurch #823 #2044 - Evidence Jeremy Phillips – Planning, paragraphs 16.3 and 19.3.

ENVIRONMENT CANTERBURY (S689) - STORMWATER IN THE HALSWELL CATCHMENT

50. The Environment Canterbury planning evidence¹³ of Ms Buddle and technical evidence¹⁴ of Mr Surman provides reasons for restricting intensification in the Halswell catchment. I note these witnesses also raise a matter relating to intensification on the Port Hills, which will be addressed in the rebuttal evidence of Mr Ike Kleynbos.
51. Mr Surman's evidence discusses the specific issues within the Halswell/Huritini catchment and the catchment-specific policies and rules in the Canterbury Land and Water Regional Plan (**CLWRP**). He raises concerns of potential cumulative effects from intensification under PC14 that cannot be easily mitigated.
52. Ms Buddle does not consider that the intensification enabled through PC14 aligns with objectives and policies in the CRPS. She considers that all the residential land within the Halswell catchment should be covered by a QM that retains the same density, building coverage and landscaping standards as the operative District Plan. She considers the simplest way to achieve this is to use the proposed 'Suburban Hill Density Precinct' for Halswell areas proposed to be covered by the LPTA QM and extend it to all other residential areas in the Halswell catchment where MDRS is proposed to be enabled, and include stormwater discharge as matters of discretion for medium density development within these precincts.
53. Mr Norton discusses Mr Surman's evidence in detail in his rebuttal evidence. He does not consider that the intensification enabled through PC14 would have a disproportionate effect on the Halswell/Huritini catchment over other river catchments.

¹³ Environment Canterbury - Canterbury Regional Council #689 - Evidence Meg Buddle
Environment Canterbury - Canterbury Regional Council #689 - Evidence Meg Bundle - Appendix 1 and 2

¹⁴ Environment Canterbury- Canterbury Regional Council #689 - Evidence of Matthew Surman

54. Given the comprehensive evidential basis needed to support an 'other' qualifying matter, I do not support a stormwater QM for the Halswell/Huritini catchment.

Brittany Olivia Ratka

9 October 2023