

Before an Independent Hearings Panel
appointed by Christchurch City Council

under: the Resource Management Act 1991

in the matter of: the hearing of submissions on Plan Change 14 (Housing
and Business Choice) to the Christchurch District Plan

and: **Christchurch International Airport Limited**
Submitter 852

Joint Memorandum of Counsel – Airport Noise Conferencing

Dated: 2 October 2023

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

INTRODUCTION

- 1 This memorandum of counsel is filed on behalf of the following submitters:
 - 1.1 Christchurch International Airport Limited (*CIAL*) (#852);
 - 1.2 Kāinga Ora - Homes and Communities (#834);
 - 1.3 Waka Kotahi NZ Transport Agency (*Waka Kotahi*) (#805);
and
 - 1.4 Miles Premises Limited (#883) and Equus Trust (#2102).

(together, *the Submitters*)
- 2 The Submitters made submissions and/or further submissions on the proposed Airport Noise Influence Area Qualifying Matter. The Submitters have filed acoustic engineering evidence on this topic and intend for their experts to participate in expert conferencing.
- 3 The purpose of this memorandum is to seek alternative directions in relation to the expert conferencing on airport noise and the rebuttal evidence (if any) from these experts.

INITIAL ARRANGEMENTS

- 4 Expert conferencing on airport noise was initially scheduled for a stand-alone session on 26 September 2023.
- 5 However, the Submitters conferred in advance of the conferencing and agreed that the session would best be postponed for several reasons, including:
 - 5.1 Waka Kotahi's expert witness was unavailable;
 - 5.2 There had been insufficient time for the experts to review each other's evidence due to the late filing of some evidence;
and
 - 5.3 The relevant matters will be substantively covered at the *City-wide qualifying and other matters* hearing topic, which is not until hearing weeks 9 and 10.

DIRECTIONS SOUGHT

- 6 The Submitters seek the following alternative timetable directions:
 - 6.1 20, 24 or 25 October 2023 (after 10:00am¹) – expert conferencing on airport noise (subject to the availability of a facilitator);²
 - 6.2 3 November 2023 – joint witness statement on airport noise due at 12pm;
 - 6.3 6 November 2023 – applications for rebuttal evidence from acoustic engineers on airport noise due at 12pm;
 - 6.4 7 November 2023 – decisions on applications for rebuttal evidence from acoustic engineers on airport noise due at 5pm; and
 - 6.5 14 November 2023 – rebuttal evidence from acoustic engineers on airport noise due at 12pm.
- 7 The Submitters consider that the proposed new expert conferencing date will enable a more effective session where all experts can attend and be sufficiently prepared.
- 8 The Submitters consider that the proposed arrangements in respect of rebuttal evidence (if any) will assist in reducing the amount of rebuttal evidence before the Independent Hearings Panel as matters of agreement and disagreement between the experts on airport noise will have been identified and matters of disagreement narrowed where possible.

¹ To accommodate a United States based witness.

² Kāinga Ora's expert ventilation witness, Mr Selkirk, is willing and able to attend, but the parties are content for him not to do so given there is no one to reach agreement or clarify matters with.

- 9 The Submitters confirm (as requested by Ms Daly) that they consider there would be benefit in the session being facilitated, if a facilitator is available. The Submitters also confirm that CIAL's experts will circulate an agenda in advance of the session.

Dated 2 October 2023



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