

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

Memorandum of counsel seeking leave to cross-examine
witnesses – Airport Noise Qualifying Matter hearing

Dated: 8 April 2024

Counsel: J M Appleyard (jo.appleyard@chapmantripp.com)
A M Lee (annabelle.lee@chapmantripp.com)

chapmantripp.com
T +64 3 353 4130
F +64 4 472 7111

PO Box 2510
Christchurch 8140
New Zealand

Auckland
Wellington
Christchurch



MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

- 1 This memorandum of counsel is filed on behalf of Christchurch International Airport Limited (*CIAL*) on proposed Plan Change 14 to the Christchurch District Plan (*PC14*) in relation to the Airport Noise Qualifying matter (*Airport Noise QM*) hearing.
- 2 This memorandum seeks leave to cross-examine the Christchurch City Council (*Council*) and submitter witnesses at the Airport Noise QM hearing on 23 and 24 April 2024 as follows:
 - 2.1 **Ms Sarah Oliver** – Council Planning Officer for the *Strategic Overview, Strategic Directions Chapter 3, Qualifying Matters relating to Strategic and City Infrastructure and Coastal Hazards*;
 - 2.2 **Mr Phil Osborne** – Council economics witness;
 - 2.3 **Mr Chris Morahan** – Council transport witness;
 - 2.4 **Ms Meg Buddle** – Canterbury Regional Council planning witness;
 - 2.5 **Ms Fiona Aston** – Miles Premises and Equus Trust planning witness;
 - 2.6 **Mr John Paul Clarke** – Miles Premises and Equus Trust witness for airport noise;
 - 2.7 **Mr Jonathan Selkirk** – Kāinga Ora Homes and Communities witness for ventilation;
 - 2.8 **Mr Matthew Lindenberg** – Kāinga Ora Homes and Communities planning witness; and
 - 2.9 **Mr Jon Styles** – Kāinga Ora Homes and Communities acoustics witness.
- 3 The purpose of cross-examination of these witnesses is to test and consider in greater detail the positions that they have taken in their reports and primary and rebuttal evidence in relation to certain key matters for the Submitters. The intent is to try and reach a more consistent position as between *CIAL*, submitters and the Council on the issues that are front and centre in the Airport Noise QM hearing, for the benefit of the Panel’s decision-making.
- 4 Counsel is mindful of the tight timeframes that the Council and Panel are working under; counsel will endeavour to keep cross-examination to 15 minutes per witness with the possible exception of Mr John Paul Clarke and Mr Jon Styles on the topic of acoustics;

they may require 30 minutes each given the breadth of the technical evidence that remains in dispute following expert conferencing on airport noise.

Dated 8 April 2024

A handwritten signature in blue ink, appearing to read 'J Appleyard', is centered on the page.

J Appleyard / A Lee
Counsel for Christchurch International Airport
Limited