

Before the Independent Hearings Commissioners In Christchurch

Under the Resource Management Act 1991 (the RMA)

In the matter of The hearing of submissions by Waka Kotahi NZ Transport Agency (submitter 805 and further submitter 2103/4) on Plan Change 14

Between **Christchurch City Council**
Local Authority

And **Waka Kotahi NZ Transport Agency**
Submitter

Memorandum of counsel for Waka Kotahi NZ Transport Agency on PC14 – Airport Noise Qualifying Matter

Dated 19 March 2024

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MAY IT PLEASE THE INDEPENDENT HEARINGS PANEL

- 1 Waka Kotahi NZ Transport Agency ('**NZTA**') is a submitter on the proposed Housing and Business Choice Plan Change 14 ('**PC14**').¹
- 2 The purpose of this Memorandum of Counsel is to formally withdraw NZTA's submissions in relation to the Airport Noise Qualifying Matter topic. The relevant submissions are:
 - a NZTA submission (submitter 805) points 805.23 to 805.31; and
 - b NZTA further submission (further submitter 2103 and 2104) points 2103.1 and 2104.1.
- 3 We confirm that NZTA will therefore not be attending the Airport Noise Qualifying Matter hearing on 23 April 2024. We also advise that NZTA wishes to withdraw the briefs of evidence of Stephen Chiles, John Falconer, Richard Osborne and Catherine Heppelthwaite all dated 20 September 2023 that were prepared for the hearing.
- 4 We apologise for the late notice, but the recent change in Government, and its policy direction recently outlined in the draft Government Policy Statement on Land Transport 2024-2034 has necessitated NZTA to reassess its involvement in this hearing process.

Dated: 19 March 2024



Christina Sheard

Counsel for Waka Kotahi NZ Transport Agency

¹ submitter 805 and further submitter 2103/4.