

From: David Townshend <dstownshend@gmail.com>
Sent: Sunday, 5 November 2023 9:31 pm
To: David Randal
Cc: Cedric Carranceja; Stevenson, Mark; planchange@ccc.govt.nz; IHP Info
Subject: Re: CCCs late release of mapping information pertaining to their s42A revised proposals of zoning. [BUD-LIVE.FID1276997]
Attachments: image001.png

Thanks Dave,

That's helpful and assists.

Regards,
David

On Sun, 5 Nov 2023, 14:07 David Randal, <david.randal@buddlefindlay.com> wrote:

Hi Mr Townshend,

Thanks for copying me into your email below – I'm a lawyer assisting the Council with Plan Change 14 (PC14).

Further to Mr Higgins' email to you, I thought it may help to orient you to other information among the PC14 materials that is relevant to answering your queries.

You'll likely be aware that PC14, as notified, included a qualifying matter proposed by the Council relating to aircraft noise.

As you record below, the new mapping reflects changes recommended by officers to that proposed qualifying matter as a result of the submission by Christchurch International Airport Limited (CIAL) dated 12 May 2023, which is submission number 852 that can be viewed at this link (beginning on page 181 of the PDF): https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Submissions/Subs851_900.pdf

CIAL's submission includes, at appendix A(i), mapping showing the updated contour that CIAL has asked to be the basis of the qualifying matter.

The officers' recommendations in response to the submission (issued in August) are discussed in various section 42A reports, primarily that of Ms Oliver from paragraph 12.6: <https://chch2023.ihp.govt.nz/assets/Council-Evidence-11-August-2023/01-Sarah-Oliver-Section-42A-report-final.PDF>

Paragraph 12.23 of Ms Oliver's section 42A report provides an illustration of the operative District Plan zoning overlain by a contour showing the qualifying matter sought by CIAL. Appendix I to Ms Oliver's report contains further information, again including maps showing the qualifying matter sought by CIAL overlain on District Plan maps of areas of Riccarton.

In summary, the officers recommended that CIAL's submission be accepted in part. Relevant aspects of those recommendations are as follows:

- At paragraphs 12.67 to 12.70 of her section 42A report, Ms Oliver recommends that the airport noise qualifying matter align with the 'Updated 50dBA Ldn Noise Contour Outer Envelope' (as proposed by CIAL) except in regard to an area of land north of Riccarton Road which is recommended to be retained as part of the High Density Residential Zone (HRZ), as in PC14 as notified. Ms Oliver also recommends that compensatory development capacity be provided by expanding HRZ around Upper Riccarton centre.
- Paragraphs 6.1.90 to 6.1.94 of Ike Kleynbos' section 42A report, where he recommends HRZ along the Riccarton Road corridor and makes specific recommendations on the spatial extents of the HRZ areas – see: <https://chch2023.ihp.govt.nz/assets/Council-Evidence-11-August-2023/05-Ike-Kleynbos-Section-42A-Report-final.PDF>.

Also relevant are:

- the expert evidence filed by CIAL, and various submitters opposing the relief sought by CIAL (such as Kāinga Ora, whose relevant witnesses are Dr Styles and Messrs Lindenberg and Selkirk); and
- Ms Oliver's rebuttal evidence, which offers a further option for the Panel's consideration, being to retain the current operative Plan zoning of land within the 'Updated '50dBA Ldn Noise Contour Outer Envelope' until a related change to the Canterbury Regional Policy Statement has been effected.

That evidence is available here: [Evidence » Independent Hearings Panel \(ihp.govt.nz\)](#)

The maps that have recently become available reflect the Council's position set out in the August reports rather than the option outlined most recently, in Ms Oliver's rebuttal, of retaining the current zoning for the time being. In any event, they are simply illustrations to assist in the ongoing hearing process.

More broadly, the officers' recommendations are among a much wider suite of information that will be considered by the Panel in making its recommendations, together with all other relevant information before it, including your submission, CIAL's submission, and all the evidence filed. The section 42A reports are just one evidentiary input to the process and do not bind the Panel.

You have the opportunity to speak to your submission (including the zoning / building heights etc that you consider to be appropriate for your property) when you appear at the hearing. Again, the Panel will be considering all evidence provided to it, including any you present (as well as that of CIAL, Kāinga Ora, and other submitters).

I also note that the qualifying matter relating to airport noise is currently scheduled to be considered in hearing week 9, on 30 and 31 January and on 1 February 2024. Please note that schedule is subject to change, so I recommend you keep an eye on the IHP's website for any updates.

I trust this information assists with your queries.

Yours sincerely
Dave



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From: David Townshend <dstownshend@gmail.com>

Sent: Wednesday, November 1, 2023 1:19 PM

To: Cedric Carranceja <cedric.carranceja@buddlefindlay.com>; Stevenson, Mark <mark.stevenson@ccc.govt.nz>; David Randal <david.randal@buddlefindlay.com>; planchange@ccc.govt.nz; IHP Info <info@chch2023.ihp.govt.nz>

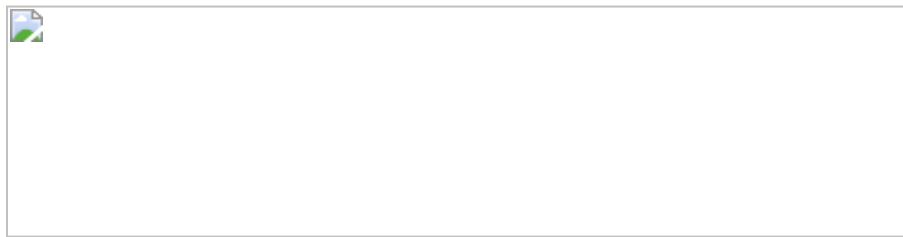
Subject: CCCs late release of mapping information pertaining to their s42A revised proposals of zoning.

Dear IHP Chair,

I have copied CCC in for their consideration and response.

CCC have released a map of the changes to the proposed plan change 14, due to their s42A reporting, on the 26th October 2023. The map is difficult to find. find.

<https://experience.arcgis.com/experience/912be292edc64680945c33e14c1fbd3f/>



I stumbled upon the map yesterday and can see with some concern, CCC have reduced intensification in Riccarton, by changing some High Density Zoned sites to Medium Density. Of particular concern to me in Riccarton which my company owns on property on the Blenheim Rd slipway between Matipo St and Wainui St.

I emailed CCC, Mr John Higgins to enquire as to what drove the revised zoning. He helpfully responded:

"The recommended changes reflect the conclusions of s42A recommendation of Ms Oliver and Mr Kleynbos released on 11 August. The change is fundamentally in response to the updated Airport Noise Interface Area Qualifying Matter (QM) presented via submission, which largely seek to retain operative zones. The site falls within the updated spatial extent of the QM. The response to the QM is in most instances to limit development to operative controls, except where there is a compensatory approach around the Riccarton or Church Corner commercial centres.

Ms Oliver within her Rebuttal Evidence has, in response to consideration of submitter evidence, made a further recommendation for a Provisional Airport Noise Contour QM based on the Updated 50dBA Ldn Noise Contour Outer Envelope, and the underlying zoning retain that under the Operative District Plan until the Canterbury Regional Policy Statement review makes a determination on the related policy.

Submitter evidence has also been led with other alternative recommendations in relating to the proposed Airport Noise QM and underlying zoning. "

I don't have time to research and respond to any evidence on this before my scheduled presentation date in two weeks, however, on the face of it, I observe that many participants/residents could be disadvantaged by not having the information available earlier. Had CCC provided this helpful mapping earlier, I would likely have submitted on this change.

I would like to understand if CCC have considered the specific site, and reflected that it is and has always been subject to greater noise from Blenheim Rd traffic, than from any planes flying over.

Additionally, what specific evidence does CCC rely on to justify MRZ, but not HRZ, when subject to airport traffic noise for this site/area?

Additionally, why are some sites enabled as HRZ within the surrounding immediate vicinity (on Matipo st less than 200m away), whilst also subject to the same Noise contour qualifying matter overlay? This doesn't seem to make sense when reflecting on CCCs response above. What is the site specific distinction?

Best regards,
David

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