

**BEFORE THE HEARINGS PANEL
FOR THE PROPOSED WAIMAKARIRI DISTRICT PLAN**

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Proposed Waimakariri District Plan
AND
IN THE MATTER of hearing of submissions and further submissions on the
Proposed Waimakariri District Plan and Variations 1 and 2
to the Proposed Waimakariri District Plan

**MEMORANDUM OF COUNSEL ON BEHALF OF THE CANTERBURY
REGIONAL COUNCIL**

16 June 2023

Canterbury Regional Council's Solicitor
PO Box 4341 CHRISTCHURCH 8140
DX WX11179
Tel +64 3 379 7622
Fax +64 3 379 2467

WYNN WILLIAMS

Solicitor: L F de Latour / K T Dickson
(lucy.delatour@wynnwilliams.co.nz /
kate.dickson@wynnwilliams.co.nz)

MAY IT PLEASE THE PANEL**Introduction**

- 1 The purpose of this memorandum of counsel, on behalf of the Canterbury Regional Council (**CRC**) is to respond to the Panel's questions set out in Minute 4 (arising from Hearing Streams 1 and 2).
- 2 Counsel understands from the Minute that Momentum Land Ltd (**Momentum**) is seeking directions in relation to the hearings process for dealing with what it has termed the "Kaiapoi growth issue".
- 3 CRC broadly understands this issue to relate to the suitability of land in Kaiapoi for further development in the face of several constraints (one of which is the Airport Noise Contour).
- 4 Through Minute 4, the Panel has requested responses on the proposed approach of hearing all submissions relating to the Airport Noise Contour in one hearing stream. The Panel has proposed to deal with all of the submissions on the Airport Noise Contour (and bird strike provisions) as part of one section 42A report, as part of Hearing Stream 10.
- 5 CRC wishes to record that it agrees with the Panel's proposed approach of dealing with all Airport Noise Contour related submissions together, as part of Hearing Stream 10.
- 6 CRC's interest in the Airport Noise Contour provisions also overlaps with the consideration of its submission points relating to the suitability of land in Kaiapoi for development through the certification process proposed for the Future Development Areas.
- 7 As the Future Development Areas are currently scheduled to be heard as part of Hearing Stream 10, CRC considers that hearing submissions on the Airport Noise Contour as part of this hearing stream along with the issues already signalled as being addressed in this hearing stream will provide for the more comprehensive consideration of the "Kaiapoi growth issue" as sought by Momentum.

Dated this 16th day of June 2023



.....
L F de Latour / K T Dickson
Counsel for Canterbury Regional Council