

**SUMMARY OF EVIDENCE OF
BRIAN WILLIAM PUTT ON BEHALF OF MOMENTUM LAND LIMITED
AND MIKE GREER HOMES NZ LIMITED**

INTRODUCTION

1. My full name is Brian William Putt. My qualifications and experience are set out in my evidence-in-chief.
2. This Summary of Evidence sets out the key points within my evidence-in-chief which is jointly presented to cover the interests of the two submitters, Momentum Land Limited (MLL) and Mike Greer Homes NZ Limited (MGH). My evidence is focused on providing a macro planning overview of the land use allocation issues that arise similarly for both submitters.

SUMMARY OF EVIDENCE

3. I have provided a consistent viewpoint on the macro planning issues affecting the urban growth of Kaiapoi through a sequence of hearings over the last twelve months, beginning with the hearings by the Greater Christchurch Partnership in respect of the draft Greater Christchurch Spatial Plan and following with the hearings on Stream 10A matters for the Waimakariri Proposed District Plan.
4. It is my observation that there is an absence of clear regional planning direction linking the Greater Christchurch development land opportunities with sound land use capability, like the subject land at Kaiapoi, against the regional need to ensure that the airport operational needs are not compromised.
5. The legacy of earthquake hazard mapping has identified Kaiapoi as a viable urban growth centre. The limited urban growth opportunities in the region need to be a significant spatial planning determinant.
6. The economic and housing demand analysis has firmly determined the need supporting the submitters' requests. This analysis, together with the engineering and planning evidence, confirms that the requests are fully

consistent with the National Policy Statement on Urban Development (NPS-UD) and can be readily implemented at the Kaiapoi locations.

7. The regional and spatial planning advantages of Kaiapoi are reinforced by the transport links provided by State Highway 1 to the Christchurch CBD and the national rail link which sits as a future corridor for a mass transit system yet to be designed or funded. In my opinion there is a high strategic urban value attached to this transport infrastructure corridor. It underpins the future growth dynamic for Kaiapoi and Rangiora.
8. The subject land at Kaiapoi is serviced and capable for development for residential/commercial/industrial purposes.
9. Unfortunately, the CRPS has failed to grasp these strategic advantages and balance them into the hazard analysis to determine the obvious capability of the subject land at Kaiapoi.
10. The NPS-UD Policy 8 opens the door for the Council to promote development capacity even if it is not contemplated by higher order planning documents like the CRPS. The MLL and MGH submissions provide that opportunity with full evidential support.
11. The planners' Joint Witness Statement (**JWS**) did not address the key issue which is whether land use controls beneath the airport noise contours should be set at a level (Ldn 50 dBA) which seriously constrains urban capable land at Kaiapoi. The JWS did not consider the compelling evidence of Professor John-Paul Clarke presented at the Stream 10A hearing confirming that the appropriate accepted international standard is Ldn55 dBA.
12. In my opinion it would be helpful for the Hearing Panel to decide on that single issue at an early stage so that the land the subject of these hearings would have clarity on whether a revised noise contour constraint should apply.
13. I note the confusion that remains unanswered about "Future Development Areas" and "Greenfield Priority Areas" as depicted on CRPS Map A. In my

opinion there is nothing to be gained by differentiating between this nomenclature. In conclusion I note that the submitters' evidence provides the appropriate s.32 and s.32AA RMA answers to the zoning request.

14. I repeat my Stream 10A evidence that it is my opinion CIAL has failed to use the appropriate designation process to impose the noise contour system and instead is transferring its responsibilities to the District Council in a manner that disrupts the District Council's ability to provide a balanced planning assessment and conclusion on land use allocation.

15. It is my view that if a holistic and macro planning approach is taken, the advantages of urban growth in Waimakariri beyond the realistic needs of the CIAL operational management will allow the useable land in Kaiapoi to be developed as the MLL and MGH submissions request.

Thank you again for the opportunity to present my evidence and I am happy to address any questions.

Brian William Putt

16 August 2024