

SUMMARY OF EVIDENCE OF MARK DAVID ALLAN ON BEHALF OF MOMENTUM LAND LIMITED

INTRODUCTION

- 1 My name is Mark David Allan.
- 2 I prepared a statement of evidence dated 3 May 2024 and a supplementary statement of evidence dated 2 August 2024 in relation to Momentum Land Ltd's (**Momentum**) request to rezone approximately 35ha (310 Beach Road and 143, 145 & 151 Ferry Road – **the Site**) in northeast Kaiapoi from Rural Lifestyle Zone (**RLZ**) to Medium Density Residential Zone (**MRZ**) subject to an Outline Development Plan (**ODP**) (**the Proposal**).
- 3 I repeat the confirmation given in my evidence-in-chief that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court.

SUMMARY

- 4 The Proposal is well-aligned with various strategic settlement and urban growth patterns that have been consistently espoused for Greater Christchurch over the last 15 years. Notably, the Site has been identified for future residential growth and development in:
 - (a) the Greater Christchurch Urban Development Strategy 2007 as part of an Indicative Growth Area;
 - (b) the Land Use Recovery Plan 2013 as within the Projected Infrastructure Boundary;
 - (c) the Waimakariri 2048 District Development Strategy July 2018 as within a Proposed Residential Growth Direction within the Infrastructure Supported Boundary;
 - (d) the Canterbury Regional Policy Statement (**CRPS**) as part of a Future Development Area (FDA);
 - (e) the PWDP as within the Kaiapoi Development Area; and most recently
 - (f) the Greater Christchurch Spatial Plan 2024 as part of a Future Urban Area.
 - 5 The Site is within the 'Christchurch tier 1 urban environment'. The NPS-UD is directly applicable to the Proposal and, as the higher order document in the statutory hierarchy, is particularly influential in this case. The NPS-UD directs the Council to provide for more housing to be built in places close to jobs,
- Summary evidence of Mark Allan on behalf of Momentum Land Ltd dated 12 August 2024

community services and public transport, and to respond to market demand. It also requires decisions that affect urban environments to be responsive to proposals that would supply significant development capacity and contribute to well-functioning urban environments.

- 6 The evidence presented for Momentum demonstrates the Proposal is integrated with the established residential environment of Kaiapoi; located near commercial centres and employment opportunities; in an area of high demand for housing; adds significantly to development capacity; meets the needs of the different households; has good accessibility to different transport modes; supports reductions in GHG emissions; and is resilient to the effects of climate change. To this end, the Proposal is consistent with a well-functioning urban environment and gives effect to the NPS-UD more than RLZ does.
- 7 The Proposal can be said to fall within the exemptions provided by CRPS Policies 6.3.5(4) and 11.3.1(6) in respect of greenfield development that is within the 50 dBA airport noise contour and in a high hazard area. There is some ambiguity in the CRPS terminology and corresponding definitions for greenfield land that, in my opinion, unnecessarily complicates the otherwise enabling intention of the Future Development Areas.
- 8 The FDAs and Policy 6.3.12 were introduced to the CRPS for the express purpose of providing for the rezoning of land within the FDAs as a direct response to projected shortfalls in feasible residential development capacity. If development within FDAs cannot occur due to the noise contour or high hazard area notations, then the purpose of FDAs (i.e., certainty of additional residential development capacity) cannot be realised. Such an outcome would be inconsistent with the NPS-UD directive that the Council “at all times, provide at least sufficient development capacity to meet expected demand for housing” (Policy 2). If the Panel determine in this case that the exemptions are not applicable, I consider the Proposal qualifies under the responsive planning decision regime provided by the NPS-UD (Policy 8 and Clause 3.8) because it will provide for significant additional housing capacity and contribute to a well-functioning urban environment.
- 9 Effects on landscape character and visual amenity values have been assessed as acceptable in the context of the adjoining RLZ and anticipated urban growth in this area. Good internal and external transport connections across multiple modes will be enabled. The Site is appropriate from a geotechnical

and land contamination perspective and is not economically viable from a rural land use and productivity perspective. The Site can be serviced with all the necessary infrastructure. Flood risk can be appropriately managed and mitigated with minimal additional inundation effect on other land and property. Any effects of the Proposal on the efficient operation of Christchurch Airport will be minimal. The Proposal will not result in detrimental ecological effects, and instead is likely to increase ecological values. The Site is suitable for urban development from a GHG emissions perspective.

- 10 Overall, the effects of the Proposal will be appropriate and acceptable, particularly in light of the efficacy of the PWDP's provisions relating to MRZ, Subdivision, Natural Hazard, Sites and Areas of Significance to Māori, Natural Environment Values, and General District-wide matters. Further, the Momentum ODP will serve to guide development that is considerate of the receiving environment, integrated with established residential areas and consistent with the balance of the notified ODP for the Kaiapoi Development Area. The subsequent subdivision design and consent process provides the appropriate mechanism to assess and determine such matters in detail.
- 11 I have suggested comparatively minor amendments to the narrative in DEV-K-APP1 (Kaiapoi Outline Development Plan) to better reflect the Momentum ODP. I acknowledge that further drafting may be required in conjunction with other structural changes to the PWDP to ensure the provisions associated with the Proposal are workable and reflect the outcome sought for the Site.
- 12 The Proposal enables more efficient land utilisation than the outcome contemplated by RLZ, and overall MRZ is more appropriate for a location where the strategic spatial planning framework has long foreshadowed urban growth and development. While the Proposal will introduce change to the Site and setting, I consider the extent of change will be appropriate in the context of the anticipated character in a FDA, the established character of the receiving environment and the recognised shortfall of residential land supply. Overall, the Proposal is a more efficient and effective way to give effect to the NPS-UD and the CRPS, and achieve consistency with the relevant objectives and policies of the PWDP.

Mark Allan
16 August 2024