

**BEFORE THE SELWYN DISTRICT COUNCIL
INDEPENDENT COMMISSIONER**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Plan Change 76 to the
Operative Selwyn District Plan

STATEMENT OF EVIDENCE OF IVAN THOMSON

On behalf of Dunweavin 2020 Limited.

12/10/2021

SHORT SUMMARY OF EVIDENCE

1. Private Plan Change 76 is a request made under clause 21 of Part 2 of the First Schedule of the Resource Management Act 1991 ("RMA"). The application was lodged on 15 December 2020 and publicly notified on 2 June 2021.
2. The Proposed Plan Change seeks to rezone approximately 13 ha of Inner Plains land to Living Z (LZ) for urban residential purposes (the 'Site') – refer to **Figure 1** for the Site's location and proposed zoning. Development will be in accordance with an Outlined Development Plan (ODP) and accompanying Narrative (see Appendix 1) which will be inserted as **Appendix E38** of the Township Volume in the Selwyn District Plan (SDP). The site will be referenced as one of 14 Living Z areas and the 'ODP' in Policy B4.3.9. It seeks to include specific matters relevant to implement PC76 in Policy B4.3.77, and requests any consequential amendments
3. The proposed rezoning would enable the creation of approximately 155 sections at residential densities of 12-15 households per hectare (HH/HA). All subdivision, development and activity standards for the Site will adopt those in the LZ Zone in the Operative SDP which helps maintain the integrity and simplicity of that document. There are proposed minor amendments to the SDP, including a new ODP and amendments to the objectives and policies to reflect the provisions of the ODP
4. Mr Friedel has raised several matters concerning the Outline Development Plan (ODP) and Policy B4.3.77 which he has invited me to comment on or modify the following matters:
 1. Amend the plan and legend from 'indicative roads' to 'primary route' and 'secondary route'. This will ensure consistency with Appendix E38 of the SDP and ensures consistency with Mr. Collins transport related recommendations.
 2. Illustrate the pedestrian and cycling links to East Maddisons Road, which support Mr. Collins transport evidence to provide safe and convenient 'active modes' of transport throughout the Site.

3. Submit ODP text as part of the evidence so that its appropriateness for inclusion in the SDP can be evaluated
 4. Reference the alignment of the existing water race on the ODP.
 5. The ODP is amended to remove the medium density housing adjacent to the indicative east to west aligned primary road directly adjacent to the Olivefields subdivision.
 6. Include additional cycle and pedestrian links from the south-western and south-eastern boundaries of the Site.
 7. Indicate a frontage upgrade along East Maddisons Road and to align the internal roads with the subdivisions on the opposite side of East Maddisons Road
8. Appendix 2 to his report provides an amended ODP that he considers addresses his recommended amendments to the ODP, and his consequential changes to Policy B4.377 are in Appendix 1 to his Report. I am generally supportive of these modifications subject to a few minor matters addressed by our Traffic Expert Lisa Williams, and Urban Design Expert Nicole Lauenstein and contained in their respective briefs of evidence. In my opinion they have adequately responded to the matters and incorporated most of the amendments suggested. I have attached the requester's amended ODP to Appendix 1 of my evidence together with the narrative that was sought by the Section 42A Report.
 9. I also consider that the ODP and narrative addresses the site specific matters raised by submitters, and Ms Williams' evidence addresses the matters raised by the Ministry of Education and Daniel and Danielle Corry. There are some relatively minor differences concerning the treatment of the water race and 'green network' matters raised by Ms Wolfe in her urban design assessment.
 10. Regarding the matters concerning public transport raised by the Canterbury Regional Council and Christchurch City Council, I agree with Mr Friedel that these issues are outside of the ambit of this Plan Change, other than the ODP ensuring that a potential bus route is enabled through the development which it does not through the ODP. These submitters have also sought a net density of 15hh/ha, however I do not consider that

there is a statutory requirement to do this. Nor is there any statutory basis for the Plan Change to consider or enable social or affordable housing as part of this Plan Change.

11. I concur with Mr Friedel's overall conclusion at 8.58 of his Report. Specifically I consider that Plan Change 76
 - I. is in accordance with and supports the growth direction for Rolleston set down in the Canterbury Regional Policy Statement and Proposed Selwyn District Plan;
 - II. promotes the social economic and cultural well-being of current and future residents of Rolleston by adding to land supply;
 - III. Gives effect to Change 1 of the CRPS and the National Policy Statement on Urban Development 2020 (NPS-UD).
 - IV. is in accordance with, and supports the objectives and policies of the other relevant planning documents;
 - V. is the most appropriate planning outcome for the using the land in a manner the promotes the purpose and principles of the RMA;
 - VI. supports the Council in carrying out its functions under Section 31 of the Act.

QUALIFICATIONS AND EXPERIENCE

1. My full name is Ivan Thomson and I hold the position of Senior Planner with Aston Consultants. I have a Master's Degree in Urban and Regional Planning (M.Phil) from Reading University in England. I have 38 years' post graduate experience in urban and regional planning, and I am a Fellow Member of the New Zealand Planning Institute.
2. My experience includes 30 years at the Christchurch City Council including 12 years' involvement with preparation, hearings and appeals for the former Christchurch City Plan (Urban Growth Chapter) , four years leading an Area Plans programme, with the remainder of my time there being in a leadership/management role, including the Christchurch Replacement District Plan.
3. I confirm that I have prepared this evidence in accordance with the Code of Conduct for Expert Witnesses. Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2014. The issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying on the evidence or advice of another person. The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which

I express my opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

4. The key documents which I have relied upon in preparing my evidence are the following:
 - a) the Canterbury Regional Policy Statement (CRPS)
 - b) the Operative and Proposed Selwyn District Plans (OSDP, PSDP);
 - c) the Selwyn District Development Strategy 2014 (Selwyn 2031)
 - d) Our Space 2018 Greater Christchurch Settlement Pattern Update - Whakahāngai O Te Hōrapa Nohoanga
 - e) National policy Statement on Urban Development 2020
 - f) Rolleston Structure Plan May 2008.
 - g) Selwyn District Growth and Demand 2021-2051 (2021).
 - h) Greater Christchurch Partnership Housing Demand Capacity Assessment July 2021.
 - i) The Council Officers' Section 42A Report.

SCOPE

5. My evidence addresses the following:-
 - a) The key features of the Submission.
 - b) Contextual background.
 - c) Issues, raised in submissions.
 - d) The relevant statutory planning documents, including the National Policy Statement on Urban Development 2020, Canterbury Regional Policy Statement (CRPS), and Operative Selwyn District Plan;
 - e) Conclusion.
6. I concur with Mr Friedel's analysis and adopt his position in responding to most matters raised in submissions and do not seek to repeat his material. My evidence is intended to add to his reasoning and findings where appropriate. In preparing my evidence I have relied on the following technical experts:
 - i. Nicole Lauenstein – Urban Design
 - ii. Lisa Williams – Transport
 - iii. Statement by Mr Alex Dunlop, a Director of Dunweavin 2020 Ltd

I have also noted technical expertise attached to the Request particularly Appendices 4, 5, and 6 concerning Geotech, Preliminary Site Investigations and Infrastructure respectively. In view of Mr Friedel's recommendations, including to approve the Plan

Change and suggested modifications to the ODP, only Ms Williams and Ms Lauenstein will be providing specialist evidence at the hearing. Mr Dunlop will also be present to read his statement and answer questions.

THE SITE AND THE EXISTING ENVIRONMENT

7. A full description of the site and surrounding environment is contained in Ms Launstein's urban design evidence. The Site is shown in Figure 1, illustrating its proximity to existing urban development. It adjoins the current urban boundary and is the logical next block for urban development at south west Rolleston. The Living Z zoning will yield approximately 155 standard residential density lots. Development will provide connectivity between existing residential development to the north and proposed development (Farrington Far West and South West Plan Changes 70 and 64) to the south Figure 2.



Figure 1. Site boundaries.



Figure 2: Nearby Proposed Plan Changes and Special Housing Areas (as at 22.3.2021)
Residential zone boundary hatched blue, Urban Growth Overlay hatched yellow (Proposed District Plan), PC64 – blue, PC70 – purple, PC71 – light pink, PC73 – green, PC75 – dark blue, PC76 – grey, PC78 – orange, Special Housing Areas – brown.

OVERVIEW OF PLAN CHANGE

Zoning Change

8. Plan Change 76 seeks to rezone 12.969 ha of land from Inner Plains to Living Z, insert an ODP into Appendix E38 of the Township Volume, and amend the references to it in Policies B4.3.9 and Policy B4.3.77. The schedule of District Plan amendments contained in PC76 do not propose any substantial changes to the operative objectives or policies for managing the settlement pattern and the growth of the townships in the District. The properties directly affected by this Plan Change are shown below.

Registered Owner	Address	Appellation Title	Area (ha)
Louise Marie Wilkinson (Purchaser Dunford House Ltd settles on 30/07/2021)	605 East Maddisons Road	Lot 1 DP 26880	4.047 ha
Angele Lorna Holton (Purchaser Dunweavin 2020 Ltd settles on 1/10/2021)	617 East Maddisons Road	Lot 3 DP 74311	4.065 ha
Michael Paul Moynihan Hayley Marie Moynihan	627 East Maddisons Road	Lot 2 DP 74311	4.857 ha
TOTAL			12.969 ha

Outline Development Plan

9. An amended ODP is attached to my evidence as Appendix 1, generally adopting the changes recommended by Mr Friedel in his Section 42A Report, together with a Narrative as requested. The development has been designed in such a way that any one of the three properties in the development area could be subdivided separately if needed, potentially reducing any delay in initiating subdivision. The middle block of 617 East Maddisons Road has more roading, due to it being centrally located.
10. The key design drivers for the ODP are:
 - a) Providing linkages between the residential development to the north and the Farringdon Far West Plan Change area to the south and ensuring connectivity between differently phased urban developments.
 - b) The main roading layout enables easy and safe access to the community including by walking and cycling.
 - c) Providing for a future connection to possible development to the west of the Site.
 - d) Providing for lifestyle choice and well-being through a range of lot sizes enabling a range of housing typologies with an area of medium density housing on the two central roads.
 - e) Achieving a minimum of 12 hh/ha (the existing house and garden sites can be subdivided as future development sites, subject to any future subdivision meeting the requirement for 12 hh/ha).
 - f) Providing safe access onto East Maddisons Road.
 - g) Recognition that frontage improvements will be required along East Maddisons Road to bring the frontages up to urban standard as part of subdivision works.

KEY ISSUES

11. In my opinion the key resource management issues, including those raised in the submissions are:
 - a) Giving effect to Policy 6.3.12 in the CRPS.
 - b) Ensuring there is adequate multi-modal integration with existing and proposed developments.
 - c) Effects on local infrastructure services.
 - d) Effects on the Strategic Transport network.

- e) Whether there are any amenity matters to be considered, or existing site features to be protected or incorporated into future subdivision.

CANTERBURY REGIONAL POLICY STATEMENT

12. Both the Request and Mr Friedel's Report traverse the relevant objectives and policies and I do not see the need to do likewise. There is acceptance both by him and myself that the Plan Change is in accordance with these provisions. The key statutory document in my opinion is Change 1 to the CRPS, which came into effect, and inserted into the CRPS as Policy 6.3.12 in July 2021. It provides for the re-zoning of land within the Future Development Areas depicted on Map A in Chapter 6 through district planning change processes. The Policy establishes several criteria to be considered when deciding whether to put a residential zoning in place, and these are well covered in my opinion by Mr Friedel. I agree with his statement at 8.31 of his Report that Change 1 is the most critical consideration to evaluating PC 76.
13. I note that one of the matters that will determine whether an FDA should be zoned is a demonstrated a need to provide further feasible development capacity through the zoning and I would like to elaborate on this matter. This assessment, together with the statement provided by Mr Dunlop highlights what I consider an urgent need to bring more land to the Rolleston market as expeditiously as possible.
- .
14. The latest Housing Development Capacity Assessment (HDCA) was publicly released in July 2021 by the Greater Christchurch Partnership, and I have attached the relevant tables in **Appendix 2**. They project a Medium Term (at 2031) surplus in capacity for Selwyn of between 3700 and 5000¹ depending on whether the recently Gazetted Future Development Areas are developed at 12hh/ha (lower projection) or 15hh/ha (higher projection). For the Long Term (30-year planning period ending 2031, there is a projected shortfall of 11,800 (at 15hh/ha) and 13 100 (at 12hh/ha).²

¹ Greater Christchurch Partnership, Housing Development Capacity Assessment July 2021

² These are the Housing Bottom Lines (HBLs) that are required to be inserted into the Selwyn District Plan (pursuant to Clause 3.6 NPS-UD) once ECAN has inserted the Greater Christchurch HBLs into the CRPS.

15. The figures suggest that the start of the shortfall will be around 2034³ and more capacity could be provided through the CRPS review if not sooner to ensure 'at least surplus' development capacity exists well ahead of 2034.
16. The situation for Rolleston looks more urgent. The number of households in Rolleston is projected to increase by 3100, (from 6755 to 9859), over the 2021-31 period, and then by a further 7176 to reach 17176 by 2051. This is a total increase of 10200 over the 2021-51 thirty-year period.⁴
17. Assuming a yield of 12 households per hectare ('hh/ha') and no intensification, around 260 ha of land will be required as a minimum to meet expected demand over the 2021-31 period, and a further 330ha between 2031 and 2051⁵, making a combined total of 550ha-600 for 2021-51.
18. The rate of take-up in Rolleston over recent years has averaged around 400 hh/annum⁶ or the equivalent of around 30-35ha/annum (although the past two years' take-up have exceeded this). There is currently capacity for 3000 dwellings (approximately 250ha of vacant land if there is no intensification or infill) in Rolleston's Living Z Zones⁷, the equivalent of the General Residential Zone on the PSDP. This suggests that there will little, or no vacant land left by 2030, at current rates of take up. In my opinion the figures suggest that all the FDA land needs to be made available now to enable housing development to start in these areas as soon as possible.
19. This point is reinforced by Mr Dunlop where he states that *'The demand is so strong that between my brother's and our Company we have pre- sold all the sections in the proposed stage one of the land **pertaining to this application** (48 sections). These sections have an estimated settlement date of February 2023. A further 25 sections in stage 2 with an estimated settlement date of December 2023 have also been sold'*. Clearly, with prices rapidly increasing, the Rolleston housing market is short of supply.
20. Other important requirements of Policy 6.12 are

³ This is based on the implied rate of take up to get from a surplus to the projected shortfall between 2031 and 2051.

⁴ Selwyn District Growth and Demand 2021-2051 (2021).

⁵ This second figure assumes 30 per cent intensification and 15hh/ha greenfield density.

⁶ Selwyn District Growth and Demand 2021-2051 (2021).Table 4

⁷ Data supplied by Council staff April 2021.

The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth

21. Development of the Site needs careful integration with connections (including for active transport) to the town centre, current and potential employment areas, and community facilities. This is achieved through development being in accordance with the ODP and Selwyn Structure Plan (**Figure 3**). The Site is part of SR 5 in the Structure Plan and SR5 is programmed as Phase 2 (2017-2026) in the Townships development sequence. I appreciate that this sequencing evolved from PC1 to the CRPS (2007), and the sequencing was removed in the amended CRPS that was inserted into the Land Use Recovery Plan in 2013. Nevertheless the staging contained in the Structure Plan provides a useful framework for managing Rolleston's growth.

The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5;

22. Policy 6.3.4 is about integrating transport infrastructure and land use, including reducing auto-dependency and promoting public and active transport. Ms Williams traverses this in her evidence.



Figure 3, Rolleston Structure Plan  General location of Site

23. Not all developments will be able to provide immediate direct access to the public transport system but ODPs (individually or collectively) need to ensure they provide spine routes that enable a future public transport service if needed. Just as importantly they need to provide connectivity for local trips through pedestrian and cycle links with the surrounding neighbourhood. In my opinion the ODP, in particular incorporating the amendments suggested by Mr Friedel, provides adequate opportunities to integrate with the surrounding transport network.

24. Policy 6.3.5 is directed at integrating land use and infrastructure: Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure. These matters are all dealt with in either Mr Collins's or Mr Englands reports. There are no issues raised that would affect the feasibility of the proposed development .

25. In conclusion there are no compelling reasons in terms of Change 1 to the CRPS why this zoning cannot be approved.
26. Policy 6.3.12 (4) requires the development to occur in accordance with an outline development plan and the requirements of Policy 6.3.3. Outline development plans and associated rules must be prepared as either a single plan for the whole of the Future Development Area or, where an integrated plan adopted by the territorial authority exists for the whole of the Future Development Area, the outline development plan is consistent with the integrated plan, the ODP can be for part of that integrated plan. As a Structure Plan exists that incorporates this FDA, the requirement is for the outline development plan to be consistent with that integrated plan. Due to the relative size of the PC 76 ODP many of the requirements of Policy 6.3.3 do not apply but I consider it is especially important as a minimum that the three waters (where appropriate) and movement networks for this ODP are integrated with the other private plan changes and in my opinion it does. Because stormwater is to be discharged into the ground, there is limited scope, if any, for a 'blue network' to be shown on this ODP.

National Policy statement on Urban Development 2020 (NPS-UD)

27. The National Policy Statement on Urban Development is directed at Tier 1 urban environments, and Tier 1 local authorities which includes Selwyn District as part of the Christchurch urban environment. The Plan Change assesses the Change against the NPS-UD and I do not propose to do that here, instead relying on Mr Friedel's analysis. The Change gives effect to this document by being an integral part of and contributing to an existing well-functioning urban area.

INFRASTRUCTURE SERVICING

28. The technical reports prepared as part of the Plan Change have raised no issues with servicing, and this has been confirmed by Council staff.

GEOTECHNICAL MATTERS AND CONTAMINATION.

29. Full details of geotechnical investigations undertaken for the Site are attached to the Plan Change. In general terms and within the limits of the investigation as outlined, no unusual problems, from a geotechnical perspective, are anticipated with residential development at the subject site. The Site is, in general, considered suitable for its intended use, with satisfactory conditions for future residential building development, subject to the recommendations and qualifications in the report, and provided the design

and inspection of foundations are conducted as would be done under normal circumstances in accordance with the requirements of the relevant New Zealand Standard Codes of Practice.

30. There is a water race running through the Site. It enters the from the northern site boundary and exits the Site on the western boundary of Lot 1 DP 26880. We are aware that the neighbouring plan change (PC70) has proposed to underground the water race at the boundary, meaning that there would be no further use of the water race once it leaves the subject site. It is therefore proposed that the water race would be terminated at the northern extremity of the subject site where it enters the property. I agree with Mr England that the appropriate process to deal with this matter is at the subdivision stage. I note however that Ms Wolfer has suggested that the water race be incorporated into the ODP as a feature and I return to this matter below.

Matters raised in submissions.

31. I consider that there are three issues raised in the submissions:
- a. Urban form, density, enabling social and affordable housing and character.
 - b. Public transport network.
 - d. Amenity effects
32. In terms of urban form, density is in my opinion the key matter of concern for the submitters who raised the urban form issue. As referenced in the Section 42A Report, the Greater Christchurch Partnership commissioned a greenfield density analysis that examined the benefits and constraints of 15 hh/ha for greenfields development, and I refer the Commissioner to paragraph 7.9 of Mr Friedel's report. I too support 15hh/ha in principle but consider that relatively small development sites such as this one do not provide the flexibility to enable the significant areas of comprehensively planned residential medium density needed to achieve 15hh/ha in an attractive way. I agree with the recommendations of the Density Report referred to by Mr Friedel that densities around 12hh/ha should be used in new developments until several constraints have been overcome (eg more leadership from public agencies, public private partnership models, overcoming negative public perceptions). PC 76 will achieve this density while providing a range of housing typologies.

33. The matters concerning public transport raised by the Canterbury Regional Council and Christchurch City Council, are in my opinion, outside of the ambit of this Plan Change, other than the ODP ensuring that a potential bus route is enabled through the development, which it does. Ensuring efficient local and sub-regional public transport infrastructure and services are strategic planning matters more properly dealt with through appropriate planning methods such as structure plans.
34. Two submitters raised issues concerning amenity and character. Tom Gurlay and Karli Goldsworthy seek that the termination point of the water race be relocated to within the road reserve of Chris Drive or council reserve. As I state below, it is the intention of the Requester to close the water race and has commenced the application process to the Council.
35. Daniel and Danielle Corry have concerns that 'the detail of the roading layout that may be included in the Outline Development Plan (ODP) may impact the amenity of the submitters property'. I consider that their concerns have been met through the road layout proposed in Ms Williams's evidence.
36. H & M Moynihan request their dwelling and curtilage at 627 East Maddisons Road is recognised and accounted for within the ODP and PC76 documentation. I consider the ODP does this.

SECTION 42A REPORT

37. The report makes several recommendations regarding the ODP, mainly around the movement network. I consider that some of these recommended modifications could add clarity and improve transport outcomes and defer the Commissioner to Ms Williams's evidence.
38. I note that Ms Wolfer in her urban design report makes several recommendations which Ms Lauenstein responds to in her evidence. I will deal with these briefly within my sphere of professional experience.
39. Ms Wolfer recommends that the amenity and ecological value of the water race are investigated and incorporated as a feature as part of the wider green and blue network. Mr England in his report identifies this option as one way to treat the water race. Along with closing the race, diverting the race, or piping the race. However this is a Council

water race and its retention and enhancement require further discussion between the Council and a future subdivider. It is my understanding however that the landowner has initiated a process to close the water race and consultation with affected land owners has commenced. Mr Dunlop will be in attendance at the hearing and can expand on this if required.

40. In any event I do not see it as the role of the applicant to investigate how future integration might occur, and it would be premature to identify any future enhancement opportunities on the ODP. There is however mention of this opportunity in the narrative as per Ms Wolfer's recommendation in 14.4.
41. Ms Wolfe recommends removal of the Medium Density notation that is placed immediately to the northern boundary and consider low density is a more appropriate response to continue the principle of a low-density perimeter buffer at the interface with neighbouring developments. I see merit in this because of the potential impact (real or perceived) on an established lower density residential area, and the ODP has been amended.
42. I agree with Ms Wolfer that well-integrated development green links provide the basis for the proposed pedestrian and cycle links and ideally should be incorporated into future growth areas. However, whilst this matter could be, and is, alluded to in the narrative, I do not consider either the requester or the Council has sufficient information to commit to incorporating this on an ODP. This is because the Council, in my opinion, is likely to consider how it uses its reserve contributions at a broader scale than PC 76 which will be at the subdivision stage. I note that there is no report from the assets manager responsible for open space. Similarly for the retention of non-protected trees.
43. As requested by Mr Collins the ODP is amended to indicate the need for a frontage upgrade along East Maddisons Road, which should be determined by the developer in collaboration with Council in accordance with the Engineering Code of Practice requirements

CONCLUSION

44. In my opinion, the rezoning of the Site is a matter of timing. Both the PSDP and the CRPS have identified the land as suited for future urban development. I can see no sound resource management reason to postpone (indefinitely) the rezoning of this land

in view of the pressing need for sections in Rolleston, as shown above in my evidence, and referred to my Mr Dunlop.

45. The proposal is consistent with the growth-related District Plan objectives and policies for Selwyn townships generally, and Rolleston specifically. The proposal gives effect to all the relevant objectives and policies in the Canterbury Regional Policy Statement and urban zoning for the Site is anticipated in the PSDP.
46. In my opinion the Plan Change, modified as per some of the Officers' recommendations, achieves the purpose of the Act and has properly addressed all the key policy matters and is consistent and / or gives effect to them. More particularly:
 - a. The Plan Change request, if approved, will broaden the choice of housing in Rolleston in a manner that is consistent with and gives effect to relevant policy documents and the enabling provisions of the Act.
 - b. The proposal is consistent with and will help promote the housing affordability aims of the Government through providing much needed housing land in Rolleston and
 - c. Through the ODP the Plan Change will provide the framework for an integrated development with appropriate internal and external road and active transport connections, and connections to future developments.

Attached are the following Appendices:

1. Amended Outline Development Plan and Narrative
2. Housing Development Capacity Assessment July 2021.
3. Transport Evidence
4. Urban Design Evidence.
5. Statement by Mr Alex Dunlop, Proponent.

APPENDIX 1 AMENDED OUTLINE DEVELOPMENT PLAN AND NARRATIVE

APPENDIX 2 JULY 2021 HOUSING DEVELOPMENT CAPACITIES

APPENDIX 3 TRANSPORT EVIDENCE

APPENDIX 4: URBAN DESIGN EVIDENCE.

APPENDIX 5 STATEMENT BY ALEX DUNLOP