

Statement of Additional Evidence

1. My name is Peter Gordon Wilson. I am a senior planner at Eliot Sinclair and Partners Limited, in Christchurch.
2. I hold the following qualifications:
 - Master of Planning (MPlan) and Bachelor of Physical Geography (BSc) from the University of Otago. I am a full member of the New Zealand Planning Institute, and a certified hearings commissioner.
3. I have 20 years' experience in working as a planner for local, central government, private consultancy, and a range of non-government organisations.
4. My work experience includes:
 - a. Policy planning for Waimakariri District Council
 - b. Statutory, RMA, and recreation planning for the Department of Conservation.
 - c. Consent planning for the Waitaki District Council.
 - d. Extensive affected party, policy planning, Environment Court case management and litigation, central government liaison, and freshwater science experience with regional Fish and Game Councils and the New Zealand Fish and Game Council.
 - e. Principal advisor (water) for Federated Farmers of New Zealand.
 - f. Private consultancy, primarily on conservation and recreation planning issues to a range of nongovernment organisation and trust clients.
 - g. Private aquaculture and geospatial businesses.
5. I have 15 years of experience in geospatial modelling and programming, particularly open source techniques and spatial SQL, and 25 years of experience in associated computer programming.
6. I have been asked to identify the following:
 - a. Land titles of between 1-20ha within 2km of the applicant's property on McDonald's road.
 - b. The number of buildings likely to be residential dwellings, or potentially used for residential dwellings on these properties.

7. This is to help determine the extent of the permitted baseline of use, and to understand the existing rural amenity in respect of additional buildings and dwellings near to the applicant's site.
8. To undertake this task, I obtained the following information from ES GIS analysts:
 - a. Up to date NZ Property Title data, including owners, from the LINZ data service (downloaded 8 September 2025)
 - b. NZ Building Platform data, from the LINZ data service (downloaded 8 September 2025, up to date to 2022, as this data is produced primarily from satellite imagery which has a lag time).
 - c. ES GIS staff undertook a visual check of potential dwellings, based on Google Earth and Google Streetview (as undertaken by ES GIS analysts) to remove non-residential use, such as farm sheds, commercial, and community centres.
 - d. I peer reviewed this visual check, identifying one additional dwelling that had been missed (very recently constructed), and as such, considered that the data layers I reviewed are accurate and representative of the area in question

Categorise land

9. I then produced spatial statistics on the layers supplied.

10. Within 2km of the subject site (yellow),

Table 1 Statistics of properties in 1ha-20ha (undersized lot) range with or without dwellings

Land category	Number of properties	With dwelling	No dwelling
1ha-20ha	92	67	25

Results and discussion

72% of the 1-20ha undersized lots within 2km of the subject property have dwellings on them, some are substantial in size (up to 400m in floor area). There are also dwellings on these undersized lots in all directions, with no particularly discernible spatial clusters of dwellings that would otherwise skew the statistics, instead, residential dwellings on undersized lots in this location appears to be the predominant use on a super-majority of the sites. This is readily apparent in Figure 1 below.

I consider that on the basis of the spatial information available to me, that the subject site (yellow) is unique in that it does not have a dwelling, whereas 72% of sites in the area do have dwellings.

Table 2

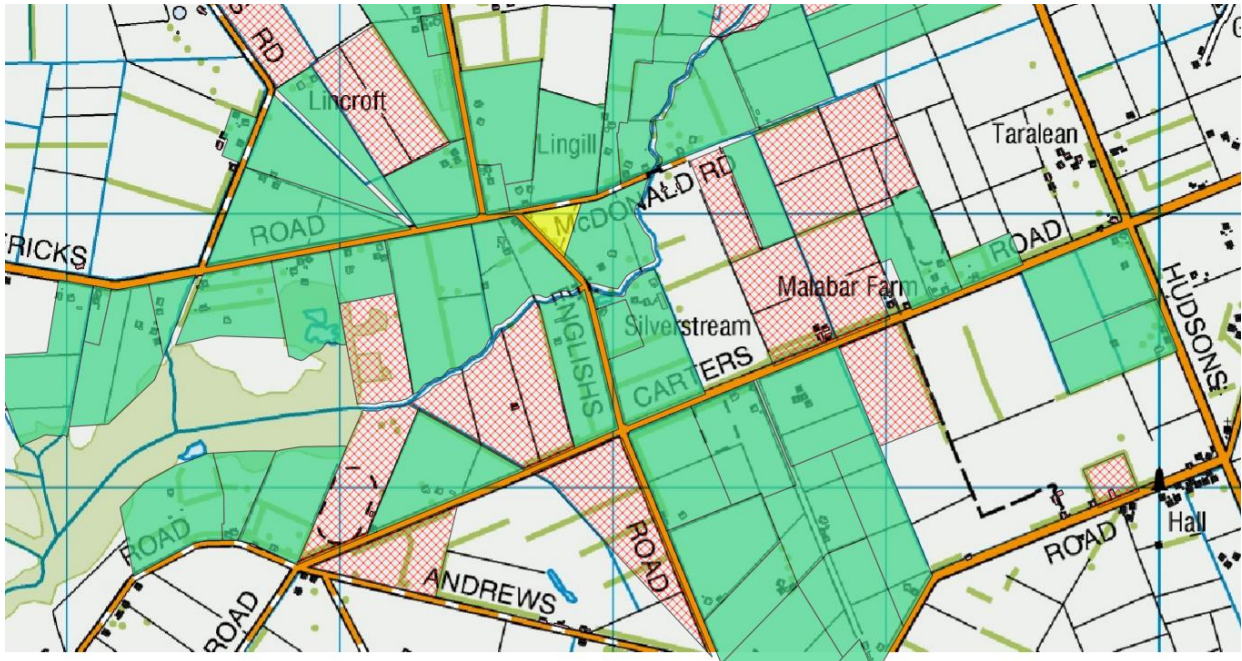


Figure 1 1ha-20ha (undersized) properties with residential type buildings (green), without buildings (red-hatched), applicant property (yellow), (white, <1h and >=20ha), (brown/teal – wildlife sanctuary)

Software used

11. Postgresql 17 + Postgis 3 + QGIS