

Summary Statement of Evidence

Sarah Jean Robson – on behalf of Ken Lewis Limited

Donald Road and Allen Bell Drive, Kaitaia – Submission 009/1-3

Hearing Topic 15C – Rezoning General

30 September 2025

1. Introduction

- My name is Sarah Robson, Principal Planner at CKL NZ Limited.
- My full qualifications and experience are set out in my primary evidence, dated 8 June 2025.
- I confirm that I comply with the Environment Court's Expert Witness Code of Conduct, and that my primary and rebuttal evidence has been pre-circulated. Today, I will summarise the key areas of agreement and the key remaining differences between the Section 42A Report, and the pre-circulated evidence prepared on behalf of Ken Lewis Limited. The submission seeks to rezone the site at Donald Road and Allen Bell Drive in Kaitaia from Rural Residential to General Residential.

2. Areas of Agreement with the Section 42A Report

- **Stormwater, infrastructure and transport –**
 - The Section 42A report summarised the findings of peer reviews undertaken on the stormwater and flooding, infrastructure and transportation assessments prepared on behalf of Ken Lewis Limited. The Report concluded that:
 - Transport effects of the proposed rezoning can be managed at subdivision stage and that the submitter's request was generally supported.
 - Three waters servicing for the site was feasible in the medium-term, subject to planned upgrades.
 - Stormwater management is feasible, with onsite solutions available.
 - These points confirm the site is technically suitable for the scale and density of residential development which would be enabled by the General Residential Zone.

- It is further noted that Appendix 1 of the Section 42A Report generally agrees with my assessment that the proposal aligns with the zone outcomes and relevant higher order documents.

3. Key Differences with the Section 42A Report

- **Economic Evidence –**

The Section 42A Report relies heavily on the economic peer review, which suggested that only 18% of the site needed to be rezoned. Tim Heath has provided rebuttal evidence that this conclusion underestimates Kaitaia's long-term residential demand and fails to account for the potential and realistic capacity constraints on flood-affected land.

- **Natural Hazards and Resilience –**

The Section 42A report has not given sufficient consideration of the significant flood risks across much of the currently zoned General Residential land in Kaitaia. The subject site is not affected by flooding and is strategically located to provide for resilient housing capacity, taking pressure off flood affected areas to provide for the future growth of Kaitaia and providing opportunities for managed retreat.

- **Urban Form and Growth Management –**

Retaining the Rural Residential zoning allows for lifestyle blocks of around 3,000–4,000m² in area to be created, fragmenting land in a logical location that may be needed to enable growth in the future. This outcome compromises integrated stormwater design, roading, infrastructure servicing, and public open space. In contrast, a General Residential zoning enables a masterplanned approach with walkways, cycle links, green corridors, and ecological enhancement. The proposal enables a comprehensive development that is unlikely to be realised with the currently proposed Rural Residential Zoning.

4. Potential for an Amended Proposal

- While full rezoning of the site remains the most appropriate outcome, I acknowledge that a refined or partial rezoning could be considered.
- The purpose of the Masterplan provided with my primary evidence was to demonstrate how the site's topography naturally defines developable and constrained areas. It also shows how a comprehensive development could be

achieved, while reflecting and incorporating the natural characteristics of the site.

- Any rezoning must therefore respond to these topographic realities, not simply apply a percentage. The Section 42A recommendation does not address the specific characteristics or natural features of the site.

5. Conclusion

- The subject site is a logical and resilient location for Kaitaia's growth, directly adjoining existing residential areas and is unaffected by significant natural hazards.
- The General Residential zoning better achieves the objectives of the Proposed District Plan, the National Policy Statement for Urban Development, and the purpose of the Resource Management Act 1991.
- Rezoning (in whole or in part) is the most appropriate outcome to ensure Kaitaia can accommodate safe, efficient, and well-designed urban growth.

Sarah Jean Robson

30 September 2025