

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE
WAIMAKARIRI DISTRICT COUNCIL**

IN THE MATTER OF

The Resource Management Act 1991 (**RMA** or
the Act)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on the Proposed Waimakariri
District Plan (**PWDP** or **the Proposed Plan**)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on Variations 1 and 2 to the
Proposed Waimakariri District Plan

AND

IN THE MATTER OF

Submissions and Further Submissions on the
Proposed Waimakariri District Plan and
Variation 1 by **Momentum Land Limited**

**LEGAL SUBMISSION ON BEHALF OF MOMENTUM LAND LIMITED
REGARDING STREAM 10A FUTURE DEVELOPMENT AREAS**

Dated: 9 February 2024

Presented for filing by:
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**LEGAL SUBMISSION ON BEHALF OF MOMENTUM LAND LIMITED REGARDING
STREAM 10A FUTURE DEVELOPMENT AREAS**

- 1 These submissions are filed on behalf of Momentum Land Limited (**Momentum**) in respect of the Stream 10A hearing of submissions on the Proposed Waimakariri District Plan (**Proposed Plan**) and Variation 1 to the Proposed Plan (**Variation 1**) dealing with Future Development Areas.
- 2 The Momentum submissions seek to rezone the land identified at Figure 1 of Momentum's submission on Variation 1 (shown below) to Medium Density Residential Zone (the **Momentum land**).



- 3 Momentum also seeks to amend the Kaiapoi Outline Development Plan as shown in Appendix 3 of the Momentum submission on Variation 1.
- 4 The Momentum submission is discussed briefly in the s42A Report for Future Development Areas.¹
- 5 The s42A Report also refers to submissions by Jolly, Revell, Charles and Rose seeking various outcomes if land is rezoned in the Kaiapoi Development Area.²
- 6 The purpose of these submissions is to advise the Hearings Panel that Momentum does not intend to appear at the Stream 10A hearing because

¹ Section 42A Report at [295] and [302]

² Supra at [301] and [306]

Momentum plans to present evidence and legal submissions at the Stream 12 (large-scale rezoning) hearing.

- 7 At this hearing Momentum will present its case in support of rezoning the Momentum land and associated changes to the Kaiapoi ODP. Momentum will also respond to the submissions by Jolly, Revell, Charles and Rose insofar as that may be required.
- 8 This approach is intended to avoid unnecessary duplication and thereby provide for a more efficient hearings process.
- 9 Counsel for Momentum is available and can appear at the Stream 10A hearing should the Hearings Panel have any questions or wish to discuss the above matters with Counsel.

Dated: 9 February 2024



Chris Fowler
Counsel for Momentum Land Limited