

Alfred Lison

From: Hamish McGillivray
Sent: Thursday, 10 September 2026 2:31 pm
To: Alfred Lison
Subject: Clarifications regarding approach to rebuttal evidence

Kia ora PPC5 Hearing Panel

I would like to provide some clarification regarding the memorandum on expert conferencing and rebuttal evidence submitted by the applicant through Mr Williams.

The rebuttal evidence below was commissioned before the Panel's direction regarding expert conferencing (Direction #4). Accordingly, we have asked the below experts, except Mr Button (as landscape matters are not subject to conferencing), to pause work on any rebuttal evidence and instead focus on conferencing. Depending on the outcomes of that process, rebuttal evidence may no longer be necessary, although this has not yet been confirmed.

The rebuttal evidence we were preparing relates only to specific topics. Not all experts have been asked to prepare rebuttal evidence, and those not required to do so have been advised accordingly. The only topics for which we currently consider rebuttal evidence may be necessary, subject to the outcomes of expert conferencing where directed, are:

1. **Landscape:** Limited to one matter of disagreement between Mr Ormsby and Mr Button regarding visual amenity effects for properties on Fairway Oaks Drive.
2. **Flooding and Stormwater:** Required because the applicant has provided substantially more information than was available at the time of our primary evidence, and this information will inform whether or not Lot 1 should be rezoned (noting the recommendation at this stage is to not rezone Lot 1 due to flooding risks).
3. **Transport:** Necessary because the transport modelling has continued to evolve, and the applicant's planning evidence has questioned the need for site-specific provisions which in part rely on the modelling and assumptions therein as it relates to the Te Moana Road/Kāpiti Expressway interchange.
4. **HPL:** A brief statement confirming that the matters raised in Ms Chambers' primary evidence have now been resolved.
5. **Water Supply:** Clarification of several matters identified by Mr Pillai that may assist the Panel.

It is not our intention to prepare rebuttal evidence in response to all matters raised by the applicant's experts. In many areas there is now substantial alignment, meaning any rebuttal evidence would be limited to outstanding matters in dispute or points where the expert considers further clarification would assist the Panel.

Any such evidence would also support Ms Pascall's addendum report on technical matters.

I hope that is helpful.

Ngā mihi

Hamish

Hamish McGillivray

Manager Urban Planning and Research
Te Kaiwhakahaere Rangahau me te Kaupapa Here
04 296 5481
027 224 0442



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