

Before the Independent Hearings Panel
At Christchurch City Council

Under the	Resource Management Act 1991 (RMA or Act)
In the matter of	Proposed Private Plan Change 23 (PC 23) to the Christchurch District Plan
And	LMM Investments 2012
	Applicant

Joint Witness Statement for:

Mark Trainor (Applicant - Geotechnical)

Neil James Charters (Council - Geotechnical)

Dr Andrew Laughton Dark (Applicant - Hydrology)

18 May 2026

Applicant's solicitor:

Jo Appleyard / Tallulah Parker

Anderson Lloyd

Floor 2, The Regent Building, 33 Cathedral Square, Christchurch 8011

PO Box 13831, Christchurch 8141

DX Box WX10009 Christchurch

p + 64 3 379 0037

jo.appleyard@al.nz / tallulah.parker@al.nz

**anderson
lloyd.**

Introduction

- 1 This Joint Witness Statement (JWS) responds to matters addressed at the caucus meeting relating to geotechnical and hydrological aspects of the proposed private plan change 23 (**PC 23**).
- 2 The caucusing took place on 14 May 2026.
- 3 Attendees at the caucusing were:
 - a) Andrew James Emil Hall - Infrastructure / Servicing (Applicant)
 - b) Neil James Charters - Geotechnical (Council)
 - c) Mark Trainor - Geotechnical (Applicant)
 - d) Dr Andrew Laughton Dark - Hydrology (Applicant)
 - e) Brian Norton – Stormwater and Flooding (Council)
- 4 Matters related to stormwater and flooding have been recorded in a separate JWS by Mr Hall and Mr Norton.

Code of conduct

- 5 Although this is not an Environment Court hearing, in preparing this statement the experts have read and understood the Code of Conduct for Expert Witnesses included in the Environment Court Practice Note 2023 and agree to comply with it.

Areas of agreement

- 6 The experts agree that groundwater levels addressed within the LandTech Geotechnical Investigation Report are a relatively broad assessment of the site, only representative of the point in time that the preliminary geotechnical investigations were undertaken, and groundwater levels and other hydrological matters should reference expert evidence of Dr Dark. Detailed groundwater monitoring and further assessment will be required for future subdivision development stages and refined geotechnical assessment.
- 7 The experts agree that the estimated groundwater level under sea level rise that Dr Dark has described in his evidence is a reasonable and conservative estimate of future groundwater conditions at the site, appropriate for the current stage of assessment.

- 8 Mr Charters and Mr Trainor agree while detailed assessment of the slope between the upper terrace and lower floodplain has not been undertaken at the plan change stage, the initial site walkover conducted during Landtech's preliminary geotechnical assessment did not identify evidence of significant slope instability or erosion. Slope modelling and detailed assessment (including the effect of future filling) would be undertaken at later stages of development. This area of agreement is not relevant to Dr Dark's area of expertise.

Areas of partial agreement

- 9 There are no areas of partial agreement.

Areas of disagreement

- 10 There are no areas of disagreement.

Dated this 18 May 2026



Mark Trainor



Neil James Charters



Dr Andrew Laughton Dark