

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT RANGIORA / WAIMAKARIRI**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
RANGIORA / WAIMAKARIRI**

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of the hearing of submissions and further
submissions on the **Proposed Waimakariri**
District Plan

HEARING TOPIC: Stream 3

**SUMMARY STATEMENT OF CLARE DALE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

PLANNING

24 JULY 2023

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1. SUMMARY STATEMENT

1.1 My name is Clare Elizabeth Dale, and I am a Senior Planner at Novo Group Limited. I have provided written evidence for this hearing. I have set out below a summary of the key points from that evidence that I wish to highlight. I have also taken the opportunity to comment on one of the questions raised by the Panel in relation to the S42A Natural Hazards Report that is relevant to Kāinga Ora's submission.

1.2 The key points I wish to highlight for contaminated land are:

- a) While the NES focuses on human health, Territorial Authorities also have responsibilities under section 31(1)(b)(iia) of the Resource Management Act 1991 (RMA) to manage the effects of contaminated land on the on the environment.
- b) Remediation of contaminated sites can have benefits or positive effects for communities and the environment. My statement of evidence proposed a new objective in this regard. On further thought in preparation for this hearing, I consider the wording of this objective would be better if it were split into an objective and policy set of provisions, as follows:

CL-O2 Benefits of contaminated land remediation:

Recognise that best practice approaches to remediation of contaminated land can have benefits for communities and the environment.

CL-P4 Benefits of contaminated land remediation:

Enable remediation of contaminated land via best practice approaches, in recognition that remediation can have positive effects in relation to, the health and wellbeing of communities, increased availability of land and for the natural environment.

1.3 The key points I wish to highlight for natural hazards are:

- a) Flood hazard information is dynamic and therefore it cannot be accurately and efficiently mapped as an overlay in the District Plan's planning maps. It is my view that flood hazard mapping, that sits outside the Plan is a useful and legitimate planning tool for Plan users. I do not consider that this approach produces uncertainty for plan users or raises natural justice concerns.

- b) The primary benefit of the Kāinga Ora preferred approach where flood hazard maps sit outside of the Plan in a GIS viewer is quick and easy updating of flood hazard information, including spatial mapping of the most accurate information, without the unnecessary cost, time and resources expended undertaking numerous plan changes under a Schedule 1 process of the RMA.
- c) The Kāinga Ora requested approach to risk-based management of natural hazards is still consistent with or the same as that proposed by Council in that the same objectives, policies and rules still apply, it is simply that the maps are in a different location.

- 1.4 The panel has asked a question in relation to paragraph 104 of the Natural Hazard S42A Report: *How will this recommendation (i.e. to remove mapped high hazard flood areas) assist readers of the Plan to understand whether/and to what extent their properties are affected (noting that many Councils have quite sweeping overlays that appear to be quite generic)?*
- 1.5 I note that in paragraph 104 Mr Willis and Mr Bacon essentially accept the Kāinga Ora preferred approach described in my evidence, of having non-statutory maps that sit outside of the Plan in a GIS viewer. However, they only do so in relation to the 'high hazard areas' as these areas are defined by modelling and will require updating due to changes in ground information and future modelling outputs. They also acknowledge the flexibility of the approach. In my view this approach to 'high hazard areas' and the reasons given for it being appropriate are the same as those provided in my evidence to remove the urban and non-urban flood overlays from the Plan and locate them in a non-statutory GIS viewer.
- 1.6 In response to the Panels question, Plan readers will still have access to the flooding information/maps that Council holds via the GIS viewer, removing it from the Plan does not prevent access. Further, the GIS viewer ensures Plan users have most up to date and accurate information available. A link to the GIS viewer is provided in the Chapter and from the planning map page in the electronic District Plan.

Clare Dale
24 July 2023

POF