

**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 5**

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

PLANNING

23 AUGUST 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.

1.2 The key points I wish to highlight earthworks are:

- a) Earthworks rules should not place unnecessary consent requirements on relatively minor earthworks associated with typical residential dwelling foundations on flat urban zoned land. This is particularly, given an erosion and sediment control plan would already be required by the building consent process, resulting in in a duplication of process.
- b) Earthworks are a normal and necessary component of every residential site development, its effects well-understood, and entirely capable of being managed (within limits) by appropriate permitted activity standards.
- c) A blanket 20m setback for earthworks from any type of freshwater body is not appropriate (particularly for 'unscheduled' water bodies) given the lack of evidence of the need for such a setback and the lack of consistency with the Canterbury Land and Water Regional Plan and other District Plans in the Region.

1.3 The key points I wish to highlight for energy and infrastructure are:

- a) Effects of other activities on regionally significant infrastructure require management (from avoidance to mitigation) to ensure incompatible activities do not unreasonably constrain infrastructure.
- b) While the EI Plan provisions consistent with NPSET are supported by Kāinga Ora, changes continue to be sought in relation to 'major electricity distribution lines'¹. Firstly, as the National Policy Statement on Electricity Transmission ("NPSET") does not apply and/or give the same legal effect to lines other than those forming part of the National Grid, and secondly Plan rules that duplicate the New Zealand Electrical Code of Practice for Safe Electrical Distance (NZECP 34:2001) have not been demonstrated to be efficient.

¹ Major Electricity Distribution Overlay – 66kV and 33kV lines on the MainPower network.

- c) In relation to the NPSET and the RPS, while I agree the provisions cover the concept of reverse sensitivity effects as one potential effect that could constrain infrastructure, the higher order documents do not always refer directly to 'reverse sensitivity' but also to 'adverse effects resulting from development on infrastructure' and to 'incompatible activities'/ 'land use compatibility'. I consider that these latter descriptions more accurately reflect the full intent of the provisions that manage the effects of other activities on infrastructure. The objective could be amended to more clearly address reverse sensitivity by instead reframing the issue as one of 'incompatible activities'/ 'land use compatibility' near existing infrastructure.

1.4 The key points I wish to highlight for transport are:

- a) Effects of other activities on the 'Transport System' require management to ensure incompatible activities do not unreasonably constrain this regionally significant infrastructure.
- b) Transport rules should not place unnecessary consent requirements on residential intensification.

Clare Dale
23 August 2023

