

Hearing statement 20 May

Intro:

Amendment: - paragraph 20 of my evidence – delete the last two words (to high) – the assessment indicates risk under the NPS matrix as medium

Outline ready 42A report, 42A Addendum issued on 12 May, and legal submissions on behalf of Invercargill City Council prepared by Mr Garbet in preparation for this hearing.

Summary of ES's role, alignment with SRPS with a particular focus on avoiding and mitigating the effects of natural hazards.

Scope of submission and evidence – Supports urban intensification of Residential 1A zoned land as it utilises the latent infrastructure capacity within the existing piped infrastructure networks.

Supportive of high quality urban design and building orientation that supports energy efficiency and solar energy gain.

Environment Southland opposes the intensification of residential development in areas identified in the areas of Riverine Inundation Level 1 Overlay, particularly between Tay and Tweed Streets as it is subject to potential inundation by the Otepunu Stream.

Key points of my evidence in relation to this issue are:

- Relevance of NPS NH 2005
 - o particularly its direction to manage risk proportionately
 - o Environment Southland's view that an assessment of the NH risk undertaken by technical staff identifies it as medium
 - o National direction recommends avoiding or mitigating risk in a manner proportionate to the level of risk
- RPS direction
 - o avoid significant and mitigate other risk
 - o precautionary approach
- increasing severity of risk anticipated over time as climate change impacts are realised and design parameters of the floodbanks adjoining the Otepunu Stream.

My overall view is that the area within the Riverine Inundation Level 1 Overlay should not have a more enabling rule framework to allow a higher density of residential dwellings to be established.

While supportive of the addendum issued on 12 May and the Legal submissions. Although, I consider that some additional recommended changes are necessary.

Key points:

- There is some inconsistency creeping into the District Plan particularly with Natural Hazard Policy 8 “avoid urban intensification in NH risk areas.
- Question about Trigger points for RD consent – is it at the time of subdivision or at the time of BC –
- If it is to remain some guidance about what level of information and evidence would be need to apply for approval – costs and if that would ultimately end up with a “no” despite the information provided. It is recommended that guidance is generated to make sure it is clear about how this will play out in practice.
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