

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of the hearing for Plan Change 13 – Uplifting
Deferred Zones of a submission by Papamoa TA
Limited Partnership

STATEMENT OF EVIDENCE OF TRACEY ANNE MORSE

16 June 2021

1 INTRODUCTION

- 1.1 My full name is Tracey Anne Morse and I am a Senior Planner at CKL Planning | Surveying | Engineering | Environmental.
- 1.2 I have been employed in resource management and planning related positions in local government and the private sector for 11 years. During this time, I have provided technical and project leadership on a number of small and large development proposals. My work is largely focused on greenfield and brownfield land development and rural and urban subdivision and land use planning.
- 1.3 I hold a Bachelor of Science (Earth Science) and a Bachelor of Social Sciences (Resource & Environmental Planning) with Honours from the University of Waikato.
- 1.4 I am a Full Member of the New Zealand Planning Institute (MNZPI).
- 1.5 I have been engaged by the submitter, Papamoa TA Limited Partnership, to provide planning evidence in respect of Plan Change 13 which seeks to uplift deferred zones.
- 1.6 My previous experience in the Waipā District includes the following relevant projects:
 - 1.6.1 Tainui Group Holdings Ltd, land use consent to establish a new police station / hub at 2 Fort Street, Cambridge to replace the existing one (located elsewhere

within Cambridge), and associated Section 127 variation of consent conditions to increase the height of the approved telecommunications mast.

- 1.6.2 Jay El Ltd, pre-application coordination of specialists in preparation of lodgement of resource consent application to develop land within the T11 growth cell in Te Awamutu.
- 1.6.3 Gauntlett Family Trust, seeking subdivision consent to establish five new Large Lot Residential Zone-type lots over two stages within the T6 growth cell in Kihikihi.
- 1.7 I am familiar with the site and surrounding environment and have undertaken a site visit.
- 1.8 I have read the code of conduct for expert witnesses contained in the Environment Court's Practice Note 2014 and agree to comply with it. I have complied with it when preparing my written statement of evidence.

2 OUTLINE OF EVIDENCE

- 2.1 My evidence considers planning matters with respect to Plan Change 13 and the T6 Growth Cell Structure Plan.
- 2.2 I have set out my planning evidence as follows:
 - 2.2.1 Amendment of the T6 Structure Plan (Submission Point 26/1); and
 - 2.2.2 Amendment to Rule 15.4.2.1(j) (Submission Point 26/2).
- 2.3 I have reviewed the information available on Plan Change 13 including:
 - 2.3.1 Te Awamutu T6 and T11 Structure Plans, Boffa Miskell, 25 June 2020.
 - 2.3.2 Three water assessment, Te Awamutu T6 and T11 Structure Plans, Tonkin & Taylor Ltd (T&T), August 2019.
 - 2.3.3 The section 42A report prepared by Ms Hayley Thomas of Waipā District Council; and
 - 2.3.4 The section 32 Report prepared by Ms Thomas.
- 2.4 It is noted that this evidence is to be read in conjunction with evidence prepared by Mrs Bronwyn Rhynd providing specialist stormwater management in support of this submission.

3 AMENDMENT OF THE T6 STRUCTURE PLAN (SUBMISSION POINT 26/1)

- 3.1 As noted in the evidence prepared by Mrs Rhynd for this submission, technical evidence to support this submission point had been prepared to be included as part of this submission. However, it was omitted in error when the submission was made to Council.
- 3.2 The evidence of Mrs Rhynd talks to the aspects of this submission point pertaining to the removal of the stormwater reserve (beyond that sought under the Structure Plan to be provided associated with the Puniu River tributary and drains). Following Mrs Rhynd undertaking a site visit and verifying the site-specific ground conditions, Mrs Rhynd considers that the stormwater reserve identified on the T6 Structure Plan within the far western sector of 164 St Leger Road would not be an appropriate location for a stormwater reserve. There are topographical and hydrological reasons for the position of Mrs Rhynd.
- 3.3 The T6 Structure Plan prepared by Boffa Miskell as is currently included within Plan Change 13 is based upon a broad, high level review of the wider T6 growth cell. This Structure Plan has not been developed based on detailed site-specific specialist assessments to determine the most appropriate locations for roading infrastructure.
- 3.4 A site-specific layout design would be influenced by specialist input regarding stormwater management, transportation, and urban design / Community Protection through Environmental Design (CPTED) matters.
- 3.5 At present, other than the preliminary stormwater management assessment undertaken as outlined by Mrs Rhynd, no such site-specific assessment by specialists in any of these fields has been undertaken for this property.
- 3.6 In addition to being based upon site-specific technical inputs, any such site-specific development layout would seek to achieve and be consistent with the design principals and outcomes sought for the T6 Growth Cell as outlined within the report prepared by Boffa Miskell for the Structure Plan.
- 3.7 There is a potential for the layout of future development of this property based on the amendments sought for the stormwater reserve outlined in paragraph 3.2 above and further site-specific specialist inputs to result in a deviation from the T6 Structure Plan prepared by Boffa Miskell. This deviation may be beyond the extent of the "in general accordance with" flexibility afforded by Rule 15.4.2.69 of the Operative Waipā District Plan (ODP).
- 3.8 The changes sought to the T6 Structure Plan by this submission point seek to decrease the potential consenting risk to any future developer of the site.

4 AMENDMENT OF RULE 15.4.2.1(J) (SUBMISSION POINT 26/2)

- 4.1 Our initial view was that the points raised in this submission are within scope. We note that we have not sought our own legal opinion as to scope or viewed Council's legal advice as to scope on this matter.

5 RECOMMENDATIONS

- 5.1 I recommend that submission point 26/1 be accepted and that the T6 Structure Plan as it relates to 164 St Leger Road be amended to:
- 5.1.1 Remove the two 18m local roads;
 - 5.1.2 Remove the stormwater reserve area north of the stream that runs east/west through the property that is located beyond the 23m buffer of the stream; and
 - 5.1.3 Upon removal of the local roads and stormwater reserve area, an overlay should be added to the plan that identifies that:
 - Any application for resource consent to develop the property is subject to stormwater management calculations and design in relation to demand for additional stormwater reserve/s, transportation assessment for road layout, and urban design for overall development layout.

6 CONCLUSIONS

- 6.1 The T6 Structure Plan as outlined within Plan Change 13 was prepared based on broad, growth-cell wide assessment. As such, there are changes that will arise at the time that site-specific specialist assessments are undertaken to support the development of properties within the growth cell.
- 6.2 In relation to 164 St Leger Road, it is considered that there is a fundamental issue with the large stormwater reserve north of the stream that runs east/west through the property that is located beyond the 23m buffer of the stream.
- 6.3 Development of this property based on site-specific specialist assessments have a potential to result in deviation from the T6 Structure Plan beyond the scope of “in general accordance with”, as indicated by the preliminary assessment of the above-mentioned stormwater reserve.
- 6.4 Providing the flexibility sought through submission point 26/1 would ensure that appropriate development, based on detailed, site-specific assessments addressing stormwater management, urban design, and transportation matters, is not subject to increased consenting risks as a result of deviation from the T6 Structure Plan prepared by Boffa Miskell.
- 6.5 I recommend that the T6 Structure Plan, as it relates to 164 St Leger Road, be amended as requested.

Date: 11 June 2021



TRACEY ANNE MORSE