



STATEMENT OF EVIDENCE OF LISA THOMAS
RANGITIKEI DISTRICT COUNCIL PROPOSED PLAN CHANGE 2016

1. Horizons Regional Council (Horizons) thanks Rangitikei District Council (RDC) for the opportunity to present evidence in support of its submission and further submission on the Proposed Rangitikei District Plan Change 2016.

A. Qualifications

2. My name is Lisa Anne Thomas. I hold a Master of Resource and Environmental Planning (First Class Honours) degree from Massey University and a Bachelor of Science from Victoria University. I worked as a consultant planner for Opus International Consultants from January 2007 until April 2013 when I joined Horizons as the Coordinator District Advice. In this District Advice role I have coordinated Horizons' comments, feedback and submissions on subdivision, land use and building consent applications, and provided hazard information to territorial authorities and members of the public across the Manawatu-Wanganui Region.
3. I have read the Code of Conduct for Expert Witnesses in the Environment Court's Consolidated Practice Note 2014. I agree to comply with this Code of Conduct. The following comments have been prepared within my area of expertise.

B. Horizons' response to the Officer's Report

Flood Hazard

4. I have read Ms Gray's Section 42A Report and her recommendations in regard to Horizons' submission points. The majority of our requested changes have been accepted, or agreements have been reached through the natural hazards pre-hearing meeting that was held on 29 April (refer to Appendix 4 of Ms Gray's Report). Where our recommendations have been accepted, we urge the Hearing Commissioner to accept these recommendations. This statement of evidence focuses on those matters

that are of particular importance to Horizons, and those provisions that have been further amended since the pre-hearing meeting was held.

5. As outlined in paragraph 10.47 of Ms Gray's Report, Horizons raised concerns about the potential conversion of commercial buildings for residential purposes due to the different freeboard requirements that apply to these different building types in flood-prone areas. Ms Gray is of the opinion that there is a low possibility of this issue occurring as residential activities are most often located upstairs (paragraph 10.47). I agree that this difference in freeboard requirements for commercial and residential activities will only affect residential activities on the ground floor. It will therefore be up to RDC to manage this potential conflict through the Building Consent process.
6. Overall, I support the proposed approach to managing flood hazard. In particular, I support the differentiation between the different types of flood hazard information available, being the 'indicative' and modelled flood information. I also support the inclusion of definitions that override the mapped flood hazard information. As outlined in paragraph 16.60, the definitions enable the hazard zoning of a property to be determined using the most accurate information available, including site-specific assessment in the absence of any mapped data.
7. The recommended Natural Hazard Area (Flooding) provisions on pages 62 and 63 of the s42A Report appear to be incorrectly numbered. Based on the Hearing Version of the proposed plan change, I understand that the Natural Hazard Area 2 (Flooding) provisions should be numbered B8.1-1 to B8.1-5. I also understand that the restricted discretionary activity standards within Natural Hazard Area 1 (Flooding) provisions should be numbered B8.7-2 (a) to (c). To avoid confusion with the decisions sought in Horizons' submission and the pre-hearing notes, my feedback on these recommended provisions will be based on the numbering in the hearing version of the proposed plan change.
8. I support the amendments to permitted activity standard B8.1-1 and urge the Hearing Commissioner to accept the recommended changes set out in Ms Gray's s42A Report (paragraph 16.37). I support the reference to "major extension" for reasons of consistency with how Horizons implements One Plan Policy 9-2. When making finished floor level requirements in flood-prone areas, we differentiate between extensions that involve bedrooms or offices which could be converted into bedrooms ("major extensions"), and those that only involve living areas or utility rooms ("minor

extensions”). “Major extensions” are considered to be those that facilitate more people living at a residence, as this constitutes an increase in risk to people from flood hazard. As noted in paragraph 15 of Horizons’ submission, we recommend that major extensions have a finished floor level (FFL) that mitigates flood hazard in a 0.5% AEP (1 in 200 year) flood event, while minor extensions can be constructed at the same FFL as the existing house.

9. The Building Regulations 1992 definition of “habitable space” is *“a space used for activities normally associated with domestic living, but excludes any bathroom, laundry, water-closet, pantry, walk-in wardrobe, corridor, hallway, lobby, clothes-drying room, or other space of a specialized nature occupied neither frequently nor for extended periods.”* Reference to the Building Regulations 1992 in the proposed definitions of “major extension” is a simpler approach than listing possible room types as per the definition that was agreed at the pre-hearing meeting.
10. However, the definition of “habitable space” in the Building Regulations 1992 includes rooms such as a lounge, dining room or kitchen. Horizons does not consider extensions involving such rooms to be a “major extension” for the purposes of assessing flood risk under One Plan Policy 9-2, as they do not facilitate more people living at the residence. If the Rangitikei District wishes to better align the provisions for extensions to existing houses with One Plan Policy 9-2, I recommend that the definition of “major extension” recommended in the Officers Report be replaced with the definition agreed in our pre-hearing meeting, as follows:

“Major extension means any extension that includes a bedroom, study or office, but does not include a new or extended living area.”

11. Subsequent amendments to permitted activity standard B8.1-2 will also be required, to refer to “major extensions” rather than “occupied space” in relation to extensions to existing commercial buildings. Suggested wording for standard B8.1-2 is as follows:

In Natural Hazard Area 2 (Flooding), any new or relocated commercial building that contains an occupied space, or major extension to an existing commercial building ~~where the extension contains an occupied space~~, must meet minimum floor height levels to avoid any inundation during a 0.5% AEP (1 in 200 year) flood event, including 300mm freeboard.

12. I recommend that the reference to “habitable space” be retained in relation to new or relocated commercial buildings in activity standard B8.1-2 and standard B8.1-3.
13. I support proposed permitted activity standard B8.1-5 and urge the Hearing Commissioner to accept the recommended wording in Ms Gray’s s42A Report (paragraph 16.37). I consider the use of the permitted activity standard that was developed for the Palmerston North City Council’s (PNCC) District Plan a pragmatic way of minimise adverse effects from the diversion of floodwaters by non-habitable buildings on production land. Regional consistency in how diversions are managed is also to be encouraged.
14. With regard to Ms Gray’s recommended definition of “occupied space”, in paragraph 16.38 of her s42A Report, I urge the Hearing Commissioner to accept this definition. I consider this to be a pragmatic means of identifying those areas or rooms within a commercial building that should mitigate flood hazard through elevated finished floor levels. The inundation of rooms that are occupied for extended periods is likely to be more hazardous than the inundation of non-habitable rooms or rooms that are only occupied infrequently.
15. I support Ms Gray’s proposal in paragraph 16.34 to amend the activity standards for Natural Hazard Area 1 to be consistent with the Natural Hazard Area 2 provisions. I also support the recommended restricted discretionary activity standards listed on page 63 of the s42A Report. However, I recommend the deletion of the word “work” from restricted discretionary activity standard b), to avoid confusion as to whether the definition of “occupied space” applies in this context. Suggested wording is as follows:

b) The finished floor or ground level of any new or relocated commercial building, or extension to an existing commercial building that contains an occupied ~~work~~ space, must include 300mm freeboard above the 0.5% AEP (1 in 200 year) flood event.
16. I support recommendation 16.61, being the deletion of the indicative flood layer from 40 Pukepapa Road, for the reasons outlined in Horizons’ further submission in response to the submission by MJL and MS Roberts (submission 016). I therefore urge the Hearing Commissioner to accept this recommendation.
17. There may be other properties where Horizons would also support the deletion of the indicative flood information, due to this information being superseded by more recent

flood modelling. However, as the zoning definitions override mapped information, we are satisfied that the retention of the indicative flood information as well as the modelled information will not result in unnecessary regulation and consent requirements. For this reason we are comfortable with the retention of the indicative flood information for Marton as recommended by Ms Gray (recommendation 16.63).

18. As noted in paragraph 16.60, Horizons is remodelling the entire Tutaenui Stream catchment. This was due to be completed this financial year, but I understand that it is now likely to be finished in early August 2016. We support the removal of the indicative flood information from Marton and Bulls following the release of the new Tutaenui Stream flood modelling (within the boundaries of the modelled area).

Taihape West Slip Zone

19. I support the overall approach to management of the Taihape West Slip Zone. The recommendations in paragraph 17.26 are consistent with what was agreed through the pre-hearing meeting that Horizons attended on 26 April 2016. I therefore urge the Hearing Commissioner to accept these recommendations (pages 71 and 72 of Ms Gray's s42A Report).
20. In paragraph 43 of our submission, Horizons raised concern about extensions to habitable buildings that involve new habitable rooms due to concerns about increasing the number of people at risk of slip hazard. However, as the nature of the slip hazard is slow moving, it is not considered to represent a significant risk to human life. As noted in the meeting minutes from the pre-hearing meeting, Horizons is reasonably comfortable with the size based approach identified in the plan for managing extensions in this zone.
21. In paragraph 44 of our submission, we raised concerns about cumulative effects of multiple extensions to existing buildings within the Taihape West Slip Zone. In paragraph 17.24 of her evidence, Ms Gray is of the opinion that the development context is such that there is little risk of cumulative effects from multiple extensions. Despite this, Ms Gray has recommended changes to standards B8.2-1, B8.2-2 (incorrectly numbered B8.2-7 on page 71 of her s42A Report) and B8.7-1 to refer to a "single addition." I support these changes. However, I note that RDC will need to ensure there is a reliable and consistent process put in place to ensure future purchasers are aware of the need to obtain a resource consent (Rule B8.7-5) for any further additions to a dwelling.

Other Natural Hazards

22. I support recommendation 18.34 to remove all references to landslide, ground shaking and liquefaction, and active fault hazards, and request that the Hearing Commissioner to accept this recommendation for the reasons outlined in the s42A Report and paragraphs 50-52 of Horizons' submission.

Advice Notes

23. I support the advice notes listed in paragraph 19.21 of the Officer's Report and urge the Hearing Commissioner to accept Ms Gray's recommendations in paragraph 19.21 of the s42A Report. The recommended changes are consistent with what was agreed at the pre-hearing meeting Horizons attended on 26 April 2016. I also support the deletion of the note in paragraph 19.22, as it is unnecessary if the other recommended notes are accepted.
24. Thank you again for the opportunity to present evidence in support of Horizons' submission and further submission.



Lisa Thomas

**COORDINATOR DISTRICT ADVICE
HORIZONS REGIONAL COUNCIL**

24 June 2016