

Before the Independent Hearings Panel at Gore District Council

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing Submissions and Further submissions on the Proposed
Gore District Plan.

Hearing Stream 3 Right of Reply of Joanne Skuse on behalf of Gore District Council

Date: 11 September 2024

Introduction:

1. My full name is Joanne Skuse. My Hearing Stream 3 Section 42A report sets out my qualifications and experience as an expert in planning.
2. I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's practice Note 2023, as applicable to this independent hearing panel.
3. I have prepared this statement of evidence to provide a response to the request by the Hearing Panel Minute 14 (30 July 2024) which directed further assessment to be undertaken by Tonkin and Taylor (T&T), with a supplementary report from myself advising whether I wish to retain or modify my zoning recommendation for the area of land in east Gore outlined in red in Figure [1] below.



FIGURE 1: APPENDIX C SECTION 42A REPORT RURAL ZONES

Background:

4. Paragraphs 198 to 212 of the Section 42a hearing report for the Rural zones discusses the inundation risk to land proposed to be upzoned from Rural Zone to Rural Lifestyle Zone in the notified proposed district plan.
5. T&T prepared a flood model with the intent to analyse large areas and not individual lots. The modelling identified a portion of the notified Rural Lifestyle zoning in east Gore as subject to H5 hazard risk as shown in Figure [2] and Figure [3], outlined in red. I therefore recommended the land subject to H5 should revert to Rural in my Section 42a report, as per Figure [1].

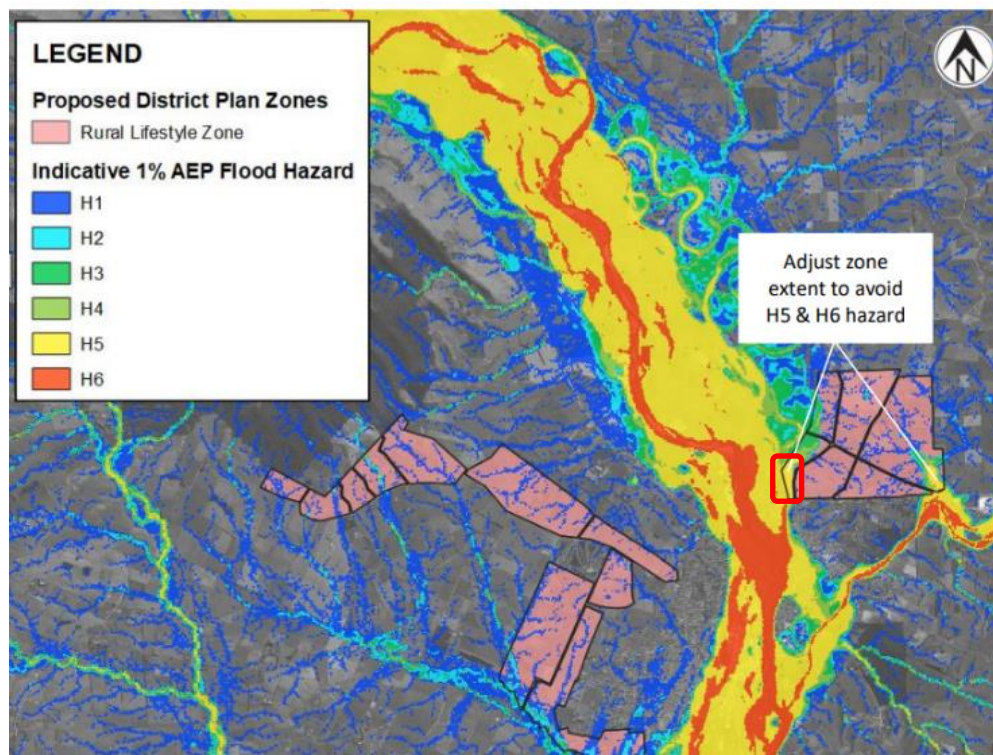


FIGURE 2: FLOOD MODELLING FROM “GORE DISTRICT COUNCIL PROPOSED PLAN CHANGE RURAL LIFESTYLE AND SETTLEMENT ZONES - FLOODING ASSESSMENT”, AUTHORED BY TONKIN & TAYLOR, DATED 11 JUNE 2024

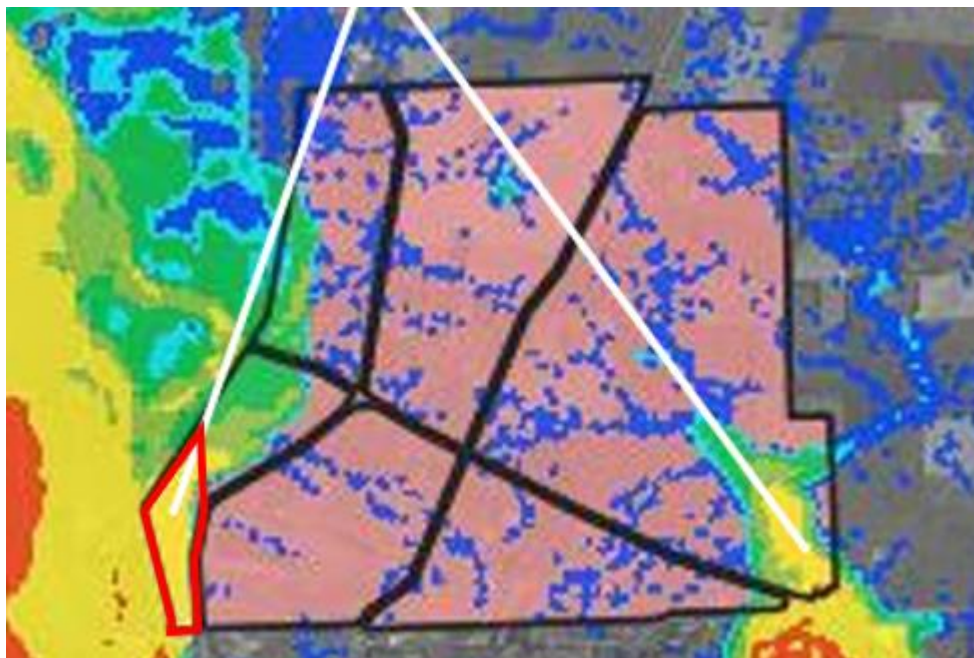


FIGURE 3: MAGNIFIED EXTENT OF H5 LAND RECOMMENDED TO BE ZONED RURAL BY S42A REPORT OUTLINED IN RED

Tonkin & Taylor Memo:

6. T&T have undertaken further assessment of the area identified in the minute, attached at **Appendix 1**. T&T provided the following advice:

“An assessment of the flood risk for the land circled in red on Figure 1 below has been undertaken based on the flood model previously developed by Tonkin & Taylor (T+T). The land lies approximately 700m to the east of the Maitara River in an area that is relatively flat and contains no significant obstructions that would prevent river overflow reaching the site. The T+T flood model has highlighted that this area lies mostly within the H5 flood risk zone up to the existing drainage creek located approximately 50m to the west of Whiterig Road. An H5 flood risk rating indicates a high risk of flooding for a 1% AEP event. This aligns with the Southland Significant Floodplains extent...

The flood model shows that the site contains a maximum flood depth of approximately 2.9m for a 1% AEP event. Flood depths for a range of locations are shown on Figure 2. The flood depths further reduce as the site rises towards Whiterig Road”

7. The Southland Significant Floodplains extent is shown in Figure [4] below.



FIGURE 4: GORE DISTRICT COUNCIL HAZARD GIS MAPPING SOUTHLAND SIGNIFICANT FLOODPLAINS SHADED LIGHT BLUE

Assessment:

8. Having visited the site and based on the advice from T&T, I remain of the opinion that a significant portion of the area requested to be reviewed by the panel, is subject to H5 hazard risk that cannot be mitigated. The flood depths detailed in the T&T memo demonstrate this.
9. T&T advise the flood depths reduce as the land rises towards Whiterig Road and flood hazard could feasibly be mitigated within this area. This creates a strip of land which has a varying width of between approximately 18-50 meters, between the floodplain and the road.

10. I consider a width of 18-50 meters provides limited space for development. Compliance with setback requirements from the road, internal boundaries, and nearby streams may significantly constrain dwelling design. Additionally, the limited width may complicate the installation of essential infrastructure, such as wastewater systems and stormwater management.
11. Developing land in such close proximity to flood-prone areas may increase the need for flood management measures, adding costs to development. Maintaining the rural zoning helps minimise future risks and costs related to potential flood damage or mitigation infrastructure.
12. In light of its proximity to the floodplain and the restricted developable area, I reaffirm the recommendation outlined in my Section 42a report, supporting the retention of the land as General Rural.
13. I acknowledge the Southland Significant Floodplains mapping extends further north east into land proposed as rural lifestyle. However, the T&T flood modelling shows this area as H4, where mitigation options are available for future development.

Recommendation:

14. I retain my recommendation that the land outlined in red in Figure [1] should remain General Rural.

Signed:



Joanne Skuse

11 September 2024

Appendix 1: Letter from Tonkin & Taylor, dated 9 September 2024