

**SUMMARY OF STATEMENT OF EVIDENCE FOR THE APPLICATION BY
ALL GOOD PROPERTIES LIMITED FOR RESOURCE CONSENT TO
CONSTRUCT DWELLINGS AND SUBDIVIDE LAND AT TAWA STREET,
INGLEWOOD INTO 13 UNIT TITLES**

- 1.1 My full name is Nicola Joy Laurenson. I have prepared a Statement of Evidence dated 17 June 2022 and will briefly summarise key points from that statement.
- 1.2 I am an independent planning consultant with 20 years' experience. I have qualifications and experience outlined in my primary evidence and I am a full member of the New Zealand Planning Institute. I re affirm that I have read and continue to abide for the Environment Court's Code of Conduct for Expert Witnesses (Environment Court of New Zealand Practice Note 2014).
- 1.3 I can confirm that I visited the site again on June 18.
- 1.4 The key points from my primary Statement of Evidence are summarised as follows:

THE PROPOSAL

- 1.5 The development is intended to be staged with the construction and unit title of PU1 being the first stage and the remaining construction and unit titling of PU2- PU13 being undertaken in Stage 2.
- 1.6 A scheme plan that better reflects the staging (ie a separate plan sheet demonstrating each stage) is tabled to complement the proposal and reaffirm the request for the development to be staged.
- 1.7 The staging of the development is to allow for the creation of a title for Primary Unit 1 ahead of the remaining units and this will provide for the needs of the current owner of the site who will reside in in Unit 1.

REASONS FOR CONSENT

- 1.8 I am generally in agreement with the Ms Symons on the statutory reasons for the application and also consider the proposal to be a non-complying activity under the ODP. No rules in the PDP are a trigger for consent for this proposal.
- 1.9 Where we differ in our assessment is that I do not consider that there is a minimum requirement for car parking for the development for the reasons set out in my Statement of Evidence.

OBJECTIVES AND POLICIES OPERATIVE DISTRICT PLAN

- 1.10 Overall, I am in agreement with Ms Symons' assessment of which objectives and policies of the ODP are relevant to the proposal and consider that the proposal will not be contrary to those objectives and policies. The proposal can meet the second part of the gateway test under s104D.

OBJECTIVES AND POLICIES PROPOSED DISTRICT PLAN

- 1.11 Overall, I agree with Ms Symon's conclusion that the Proposal, on balance, will not be contrary to the relevant provisions of the PDP. I also accept My Symon's position that she has not placed as much weight on the provisions of the PDP compared to the ODP. No decisions have been released on the PDP and the provisions, such as the Residential Zones Chapters and Design Guides may change due to submissions. An example of recommended changes to provisions due to submissions on the PDP is set out in my Statement of Evidence.

NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020

- 1.12 The NPS UD-2020 supports increased densities within urban environments. Inglewood is an urban environment because it is urban in character and while it does not have a population of 10,000 it contributes to the housing and labour market in Taranaki and New Plymouth which has a combined population of more than 10,000 people.

- 1.13 This Proposal seeks to provide quality medium density living and is located within close proximity to local amenities. The Proposal is consistent with the direction of the NPS UD-2020.

TARANAKI REGIONAL POLICY STATEMENT

- 1.14 The Proposal is consistent with the Taranaki Regional Policy Statement as set out in the application, Ms Symon's report and my statement of evidence.

ENVIRONMENTAL EFFECTS

- 1.15 My Statement of Evidence provides an assessment of the following matters.

- Residential Character and amenity;
- Traffic generation;
- Parking and manoeuvring;
- Services and risks of natural hazards;
- Building platform and risk of natural hazards;
- Construction effects;
- Positive effects.

- 1.16 Where required, these assessments are supported with expert evidence from Mr Stanley, Mr Skerrett and Ms McQueen. Where I have relied on these assessments is set out in my Statement of Evidence. The assessments have found that all adverse effects would be less than minor, or minor (but not more than minor) and overall effects will be acceptable subject to the imposition of conditions.

- 1.17 Regarding amenity effects, I consider the overall site coverage figure to be the most representative of adverse effects that would be experienced by the submitters due the submitter viewing the Proposal as one development

instead each PU individually. This site coverage noncompliance is unlikely to be discernible as the site is long and orientated away from the road. Furthermore, the privacy of the submitters would not be compromised as they are located on the opposite side of Tawa Street from the development and their outdoor living areas are physically separated from the development.

- 1.18 The proposed landscaping is intended to provide for the privacy values of the future residents of the dwellings and for people residing at the neighbouring properties as well as enhancing amenity values. The proposed landscaping will provide consistency with the fenced and planted streetscape in Tawa Street.
- 1.19 Ms McQueen has recommended an additional condition of consent in the event that plant species in the Landscaping plan are unavailable at the time of planting. The applicant accepts this condition, and it is requested that it be included in the land use decision should consent be granted.
- 1.20 Each unit is provided with at least one car park with most units having two car parks. The Proposal provides over and above what can be expected for a residential development which will assist in maintaining an un-cluttered streetscape and existing amenity values.
- 1.21 Notwithstanding, Mr Skerit, in his evidence identifies that on-street parking is a regular occurrence on Tawa Street and any additional street parking from visitors to the development will not be unusual or out of keep with current practices for other properties. I agree with this statement and do not consider that any additional car parking is required on site to protect amenity values of the submitter or other users/residents of Tawa Street.
- 1.22 Increased traffic generation as a result of the Proposal has the potential to affect amenity values because of visual impact and noise. The timing for potential adverse effects is during the peak hour traffic. The peak hour traffic generation from the Proposal is expected to be 8 which is consistent with the permitted traffic generation allowed over an hour between 7am and 10pm and therefore acceptable. I also agree with Ms Symons that the traffic generated by the proposal, once on the road, will be indiscernible as to its origin or destination.

- 1.23 Regarding traffic safety and efficiency, Mr Skerrit has provided evidence on the proposal and has stated his agreement with the conclusions in the Officer's Report where they are within his expertise. Adverse Traffic safety and efficiency effects would be acceptable subject to proposed conditions.
- 1.24 Regarding parking and manoeuvring, cars will be able to manoeuvre in the site's common area.
- 1.25 In reliance on the effects assessments by Ms Symons which confirm Council's position that there is capacity for the site to have connections to Council's reticulated services, the Proposal would have acceptable effects relating to servicing of the development. Adverse effects would therefore not be more than minor on the environment.
- 1.26 Building platforms are available within the site for the proposed units and stormwater can be managed. Therefore, in reliance on Mr Stanley's evidence I agree with the assessments of Ms Symons and conclude that any adverse effects relating to natural hazards, building platforms and stormwater disposal would not be more than minor on the environment and that effects of the proposal are acceptable subject to proposed conditions of consent.
- 1.27 Construction effects can be managed with conditions of consent. Ms Symons proposes conditions in this regard and the applicant accepts that conditions are necessary.
- 1.28 Overall, the proposal will have adverse effects that are not more than minor and can pass through the first limb of the gateway test under s104D. The proposal will have acceptable effects when considering s104(1)(a).

OTHER MATTERS

- 1.29 The proposal will accord to Tai Whenua, Tai Tangata, Tai Ao which is the Iwi Environmental Plan for Te Atiawa Iwi. The relevant matter for the site and proposal is the issue of Stormwater Management.

CONCLUSION ON SECTION 104D AND 104

- 1.30 The proposal can meet both limbs of the gateway test and can be considered for granting under s104.
- 1.31 In summary, I consider that the actual and potential effects of the proposal are able to be avoided, remedied or mitigated through the imposition of the proposed conditions as set out by Ms Symons, subject to the suggested amendments set out in Section 10 of my Statement of Evidence, Therefore I consider that the effects of the proposal will be acceptable under s104(1)(a).

PART 2 OF THE ACT

- 1.32 I agree with the Part 2 assessment undertaken by Ms Symons set out in Section 17 of the Officer's Report and having regard to my own assessment in my Statement of Evidence I consider that the proposal is consistent with the principles (sections 6-8) of the Resource Management Act 1991 and overall, I consider that the application meets the relevant provisions of Part 2 of the Resource Management Act 1991. The Proposal achieves the purpose (section 5) of the Resource Management Act 1991 being sustainable management of natural and physical resources, in this case residential land.

CONDITIONS OF CONSENT

- 1.33 I have reviewed the suggested consent conditions proposed in the Officers Report and have suggested amendments set out in my Statement of Evidence. These amendments relate to staging of the subdivision, the inclusion of a landscaping condition at the recommendation of Ms McQueen and other minor amendments for consistency and clarity.