

Summary of Statement of Evidence Hearing 4 (Infrastructure, Transport, Earthworks and Three Waters)

- 1.1 My full name is Claudia Paterson Jones. I have prepared a primary statement of evidence dated 21st January 2022 relating to infrastructure, transport, earthworks and Three Waters issues. My qualifications and experience are set out in my primary statement. I reaffirm that I have read and continue to comply with the Code of Conduct for Expert Witnesses (2014) and that I am a Waka Kotahi employee.
- 1.2 I note that I have read the supplementary evidence of Mr Rory Smeaton on behalf of Council in which I understand that his position on the below provisions has not changed from that expressed within the s42A report. I have also read the JWS (transport) dated 3 February 2022.
- 1.3 I generally agree with the recommendations in the s42A report, subject to the following key points from my primary statement of evidence that are summarised below.

INF-R6

- 1.4 I consider that a restricted discretionary activity status, as opposed to a discretionary activity status, is appropriate for the upgrading of existing infrastructure that is located on or within a heritage area or within an area of significance to Māori.
- 1.5 The upgrading of existing infrastructure within the heritage areas/ areas of significance to Māori has the same activity status as any new infrastructure under INF-R45. A restricted discretionary activity status is more appropriate for the upgrading of infrastructure as this takes into consideration the efficient use of the existing infrastructure and the scale of effects given the infrastructure is already established. A restricted discretionary activity status also ensures that the use of existing infrastructure is maximised rather than encouraging new infrastructure. This is consistent or more restrictive than the approach of other district plans.
- 1.6 I consider that a restricted discretionary activity status with appropriate matters of discretion can sufficiently address any potential adverse effects within heritage areas and areas of significance to Māori. Given INF-P17 already addresses upgrades to existing infrastructure within those areas, I consider that this policy would be an appropriate matter to which Council's discretion is limited to.

INF- R27, INF-R29 AND INF-R30

- 1.7 It is in my view that these rules need amending to provide a restricted discretionary activity status for the upgrade of National, Regional and Arterial roads as opposed to a discretionary activity status. Whilst I agree that new roads that are classified as a National, Regional or Arterial Road should have a discretionary activity status, the effects from the construction of a new road are significantly different to those associated with the upgrade of an existing road. As the road is formed, it is only the effects which are above and beyond the existing environment that are assessed. The construction of a new road will be more likely to have greater effects than the upgrade of existing infrastructure.
- 1.8 Similarly, to my evidence on INF-R6, I consider that the effects of the upgrade of a National, Regional or Arterial Road can be assessed as a Restricted Discretionary activity, with discretion being limited to the relevant policies (INF-P13, INF-P20, INF-P21, INF-P22) that address the upgrade of infrastructure within specific overlays.

INF-S22

- 1.9 It is in my view that INF-S22 needs amending. I understand that that INF-S22 relates to new roads rather than those already classified in accordance with Schedule One. However, I consider

that this could be better supported by minor amendments to provide clarification for plan users.
I suggest the following amendment is appropriate (in underline):

[...]

2. New Collector and Access Roads must be classified according to INF-Table 1
(Road design standards).

Claudia Jones

11 February 2022.