

Good afternoon.

My name is Julie Comfort, and I am a senior planner with Davie Lovell-Smith Ltd a consulting firm of planners surveyors and engineers. I have over 26 years' experience, during many of which I have involved obtaining numerous consents for clients for residential greenfield subdivision developments and multi-unit developments.

I am here today to discuss the financial contribution rules, and in particular how they apply to residential subdivisions. The primary concern raised in the submissions and my evidence is in how the rules are drafted and implemented, because as they were notified there was the potential for double counting.

Rules 6.10A4.1.1 P1 and P2 are very similar and as such very confusing. P1 relates to the built-form residential development in residential zones, residential greenfield site or brownfield sites. P2 also relates to the built-form residential development in residential zones, residential greenfield site or brownfield sites, with the addition of including sites where roads are to be created. There is nothing within P1 that restricts it to "infill developments.

As set out in my evidence I consider that given the similarity within the rules, that it would be clearer to have two separate rules one that just addressed tree canopy for built form and one that addressed tree canopy when roads are created. In this way there is risk of the potential for double counting as discussed in my evidence.

There are usually very clear reasons why trees are cleared from a site when residential subdivision is to be undertaken. Examples would be geotechnical remediation, reshaping to ensure appropriate drainage and filling to ensure site is above flood level.

Based on some of the questioning from this morning, I thought I'd just outline the process for the provision of street trees as part of a subdivision that creates roads. To date the requirement to plant street trees is usually placed as a condition on a subdivision consent where roads are to be created. This is to reflect the requirements of the Council's Infrastructure Design Standard, which is listed in Chapter 8, 8.3.2 as a document that can be used to form conditions of a subdivision consent. The road design requirements in Subdivision Appendix 8.10.3 stipulates the need for an Amenity Strip for all urban roads. The street trees and other planting within land to be vested in Council are required to go through an approval process, where Council staff review the design and species to be planted. Once a consent is granted, the detailed engineering design is undertaken which confirms the location of reticulated services within the road and where streetlights are located. At that point a streetscape landscape design is undertaken and submitted to council for approval. The trees themselves are approved at the nursery by a Council arborist and are reviewed again several times during the construction process until the Council takes over the maintenance of the tree.

Landscape bonds are used in two situations. Firstly, when planting cannot be undertaken prior to the application for s224c at the end of the subdivision process. This is often a result of the time year or groundwater conditions. The secondly there are Establishment Bonds that are required which cover the first 24 months a tree's planted life, this is provided for Council to replace the trees should the developer not do so during the 24 month maintenance period.