

The Commissioners
C/- Gore District Council
By email:

Thank you for sending us a copy of the written right of reply (which also deals with proposed conditions) and the copies of the three new evidence briefs. The Society wishes to respond as follows:

1. We understood from the wording of the Second Minute of the Commissioners that the hearing was adjourned for the purposes of the filing of the written right of reply by Counsel for the Applicant, and to permit the conferring by the Planners over conditions.

The Second Minute contained no provision for the submission of further evidence on behalf of the Applicant or the submitters in terms of the adjournment of the hearing. Therefore we believe, with respect, that a point of order arises as the introduction of new evidence by way of the three new briefs of evidence is improper because the provision of new evidence was not part of the reasons for the adjournment. Accordingly we object to the introduction of the three new evidence briefs. Again, with respect, there is no ability for the hearing to consider other bridge locations other than that location set out in the Application.

We submit that the new evidence should be struck from the record because if such evidence is to be considered, then a new application should be initiated by the Applicant. We believe that the Commissioners should be considering the evidence presented at the hearing only.

2. Despite the point of order, the Society wishes to comment on the new evidence as follows:
 - A. We believe the attempt to introduce new evidence is confirmation of our submission and statement to the hearing that the Applicant has not given appropriate consideration to alternative bridge sites or for methods of getting water across the Mataura River prior to the hearing.
 - B. To take this point further, the Applicant via the three new briefs of evidence has not provided any evidence that it has considered a trench through the Mataura River which would contain the Pipes (as opposed to directional drilling) nor are there any costings of attaching additional pipes to either the State Highway 1 traffic bridge (thereby increasing existing capacity) or to the Railway Bridge. Nor is there consideration of a "single purpose" pipe bridge between the abovementioned bridges. Therefore we maintain that the Applicants consideration of alternatives prior to filing its application has not been adequately undertaken, and such purported consideration is in fact token consideration.

The Councils list of sites considered is in fact a list of "wants and reasons to dislike", rather than an assessment of alternatives from a planning perspective, and which appears to be determined on the financial cost of each option as opposed to the "effects" of a bridge in any particular location.
 - C. Notwithstanding the above, the new evidence from Mr Standring around construction costs is inaccurate and misleading. If the costs of constructing the pipeworks from the Reservoir down Maitland Street to Hamilton Street is put to one side, (which is the most expensive portion of the pipeline), the trenching costs per metre from that point to other locations falls dramatically (ie. costs per metre are at a lower rate). Therefore the costs associated with a bridge at Maitland Street "Option C" (or a trench through the river) becomes considerably cheaper. We dispute the argument that NZTA would not assist with funding of a bridge at any other location.
 - D. In any event we understand that comparative costs at alternative sites are not a reason under the Resource Management Act for approving or declining an application.
3. The Society remains opposed to the application.

Yours sincerely


David J Gray
Chairman.

Waimea Plains Landscape Preservation Society Incorporated

2 March 2021