

## **SUMMARY OF EVIDENCE OF ROBERT KERR ON BEHALF OF WAIPOPO HUTS TRUST & TE KOTARE TRUST**

### **INTRODUCTION**

1. My full name is Robert Kerr. My qualifications and experience are set out in my Evidence in Chief.
2. This Summary of Evidence sets out the key points within my Evidence in Chief.

### **SUMMARY OF EVIDENCE**

3. My evidence assesses the flood hazard to the Waipopo Huts from a breach of the Opihi River Stopbanks.
4. In summary, I am concerned that the assessments undertaken by Environment Canterbury (ECan) are overly conservative leading to the actual flood hazard being overstated, and the actual hazard is not likely to meet the threshold of high hazard under the Canterbury Regional Policy Statement.
5. The key point here is that there is uncertainty in the robustness of the hazard assessment of the Waipopo Huts and in my view, the likelihood of a high hazard across the site is materially lower than that assessed by ECan.
6. While maintaining a prudent approach to flood hazard, I suggest that this uncertainty needs to be considered in light of the competing matters such as those raised in the evidence of Ms Stephenson regarding Kemps Deed and the history of this site, and duties of local authorities in relation to Te Tiriti.
7. That said, I consider that it is prudent to manage future development in the area so not to materially increase the impact of any flooding on people and property at the Waipopo Huts.
8. As such, I am able to support an approach where the lower lying areas closest to the stopbank retain a form of existing use rights, but are limited as to the ability to develop, with the higher area able to build modern homes, subject to compliance with finished floor level requirements.

Thank you for the opportunity to present my evidence and I am happy to address any questions.

**Robert Kerr**

**7 February 2025**