

Appendix 12: Correspondence with Horizons during evidence preparation

From: Penelope Tucker <pen.tucker@horizons.govt.nz>
Sent: Friday, 26 July 2019 11:38 am
To: Harris, Andrea
Cc: Jon Bell
Subject: RE: Suggested stormwater wording
Attachments: stormwater ideas HRC submission PT comment 20190726.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Andrea,

Thanks for sending through these draft amendments to respond to the issues we have raised in our submission and in discussion when we met this week. My immediate thought is that, while these go some way to addressing the issues, there are still some fundamental problems that they don't cover.

The key outcome Horizons is looking for in relation to stormwater, as I understand it, is that there is no additional stormwater discharged into the Makino as a result of development in Growth Precinct 4. Jon has explained to me that he could not support any application for consent that would increase the volume of stormwater discharged into the Makino, whether directly from a development or from MDC's network. We're concerned that appropriate infrastructure is not available to support development in this area, which is leaving the district plan provisions to patch the hole this leaves.

In addition to the comments and suggested amendments to the policy amendments you've sent through (attached), I've highlighted some of the wording in the performance standard that leap out as implying that stormwater will be allowed to be discharged beyond the development / into the existing network / directly to the Makino. I think these (and possibly others) would need to be reframed around demonstrating how stormwater will be effectively managed onsite to prevent any additional water getting into waterways, especially the Makino.

The other thing Jon and I have discussed is whether this is also potentially an issue if development were to occur without subdivision, and Jon considers it is. He is clear that he would like to see provisions to achieve the same outcome in the residential zone provisions. At present the focus is entirely on providing permeable surface areas to minimise stormwater flooding, so we'd be looking for policy direction and permitted rule standards / matters of discretion in the RD rule around stormwater discharges.

Hope this is helpful. I will be back at work on Monday if you want to discuss.

Ngā mihi nui
Pen

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Potential Stormwater solutions

Policies

3.8 To require an integrated approach to stormwater management that recognises the capacity of existing systems and overland flow paths within Growth Precinct 4, and identifies how onsite stormwater collection, attenuation and discharge is provided for onsite.

OR

3.9 To require an integrated Stormwater Management Plan to be lodged at the time of subdivision that outlines how onsite stormwater collection, attenuation and discharge is managed onsite for the proposed development.

Add a new performance standard to Rule 8.4.1:

Stormwater Management Plan

For Growth Precinct 4, a report from a Chartered Professional Stormwater Engineer identifying the potential stormwater risks to the site and infrastructure that supports development is required. This report must cover:

- i. A site specific hydrologic modelling assessment based on the proposed subdivision plan, and include assessment for different downstream discharge conditions.
- ii. Scoping of all internal stormwater infrastructure and how it will interact with the existing drainage system including connection to the existing stormwater network.
- iii. Treatment of all stormwater runoff prior to discharge to the primary network and/or direct discharge to the Makino Stream.
- iv. Protection of treatment devices and treatment runoff during all phases of construction.
- v. Outline how the development will hydraulically relate to its surrounding environs, including assessment of overland flow paths and potential flood impacts of proposed and existing development.
- vi. Outline how the stormwater management system will ensure that any changes in runoff from the site will be addressed.

This report must also contain recommendations as to the location, design and construction of stormwater infrastructure that are appropriate to mitigate any characteristic or feature identified. A copy of any site calculations must accompany the report.

Commented [PT1]: I'm ambivalent as to whether you amend Policy 3.8 or insert a new Policy 3.9 here. However, I would prefer to see a stronger policy identification that management needs to be onsite (in the absence of appropriate infrastructure). This could be done by shifting where the word 'onsite' falls in the wording

Commented [HA2]: This is my preference

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From: Harris, Andrea <andrea.harris@wsp.com>
Sent: Wednesday, 24 July 2019 12:49 pm
To: Penelope Tucker
Subject: Suggested stormwater wording
Attachments: stormwater ideas HRC submission 24 July.docx

Hi Pen

Without Prejudice

Thanks for the meeting the other day. Very helpful.

I have spent more time thinking about the ideas discussed on Monday about new provisions for the Comprehensive Development Plan. I have actually gone a step further and drafted a new performance standard for all subdivisions in Growth Precinct 4 to require a Stormwater Management Plan to be prepared. I have included specific detail on what this report is to cover.

I have also identified a change to existing policy or a completely new policy. My preference at this stage is a new policy.

Interested in your thoughts on this.

Is it possible to get initial thoughts from you on the attached this week?

Cheers
Andrea

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