

9th February 2018

Dean Moriarity
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Napier City Council
Private Bag 6010
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Dear Mr. Moriarity

Notification of Plan Change 11 to the Operative City of Napier District Plan: Park Island Reconfiguration

Thank you for the opportunity to make a submission on Plan Change 11 to the Napier District Plan. As you will be aware, we had previously provided comment on an earlier draft version of Plan Change 11 in October of 2017.

HBRC support in part the proposed Plan Change 11. We have a clear understanding of the key drivers for Plan Change 11, particularly those regarding the need to provide for demand in residential housing and enhanced sporting facilities. Our understanding is in part informed by our mutual roles as joint partners in the Heretaunga Plains Urban Development Strategy and as managers of stormwater and drainage assets in the Ahuriri Estuary catchment. However, we are not currently convinced that the rezoning and associated infrastructure planning in place is sufficiently sound.

We accept that the rezoning is not yet the time or stage for fully fledged infrastructure design effort to accommodate the needs of development within the proposed rezoned areas. However, we cautiously approach this proposal given recent events and in having regard to our fundamental responsibilities for the environment under the Resource Management Act.

Due regard to the Regional Policy Statement

It was highlighted by HBRC during pre-notification consultation that Section 5.5 of the s32 Evaluation report was lacking detail in its assessment. Whilst we appreciate that the proposed plan change is largely influenced by the RPS's policies pertaining to the built environment and the Park Island/Parklands greenfield growth area, we remain of the opinion that a fuller assessment of policies in at least the following RPS chapters was warranted:

- 3.2 The sustainable management of coastal resources
- 3.5 Effects of conflicting land use activities
- 3.9 Groundwater quantity
- 3.10 Surface water resources
- 3.12 Natural hazards
- 3.13 Maintenance and enhancement of physical infrastructure

We appreciate that additional text has been provided in the s32 report to justify why this assessment has been limited, however the argument that *'the same land use activities will essentially occur within the same overall footprint'* does not seem a well-reasoned justification to essentially cherry-pick which parts of the RPS should be considered. Following this line of thought one could argue that given there is no change in land use there ought not to be an assessment of RPS Chapter 3.1B 'Managing the Built Environment'. However we disagree. We highlight that it is the extent and robustness of the assessment which is currently lacking, rather than the conclusion itself.

Stormwater collection, treatment and disposal

Based on the information provided within the proposal it appears that stormwater runoff from development is likely to be able to be accommodated within the existing drainage network, however, there is a lack of detail around the proposed runoff, consequently until such a time that detail is provided HBRC are not in a position to provide fuller support in favour of the Plan Change.

The s32 Evaluation Report highlights in chapter 5.3.3 how stormwater is proposed to be addressed within the identified zoned areas for residential use. The document notes that *'ultimately, runoff from the proposed re-configuration will be managed in the same manner i.e. primary runoff piped to the overflow channel on the northern side of Prebensen Drive and secondary runoff conveyed to the same channel via the open swale drain along Orutu Drive with eventual discharge via the Purimu Pump Station ...'*

Upon review of the supporting information it appears that no runoff from the developed area will enter the Taipo Stream, as it is generally directed to the Purimu system. As can be seen in the image below, there is a natural overflow path from the Taipo towards the development area, which needs to be kept available if levels in the Taipo Stream are to remain as they are presently i.e. without the overflow, flood levels in the Taipo Stream would be higher. We wish to highlight that HBRC have never examined the impact of such an overflow, and it was suggested this be examined in the earlier 2012 report (by HBRC).

Proposed Development

A plan showing the draft proposed development concepts is shown in Figure 2.

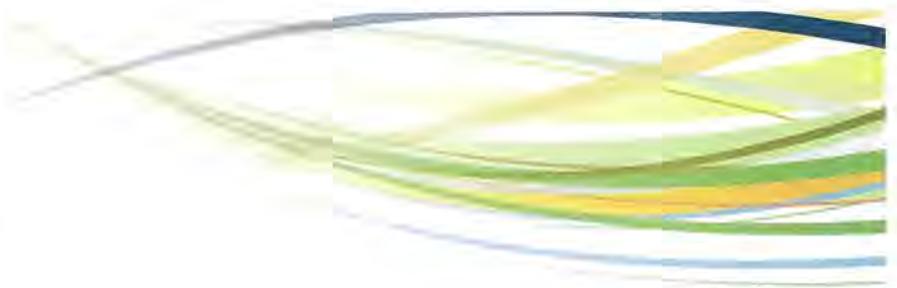


Figure 2: Proposed Development (DRAFT)

Whilst the changes to the plan appear to be able to be accommodated within the existing framework, HBRC drainage asset managers have not been party to any analysis or design work as part of the rezoning development proposals. Consequently we cannot comment of the potential impacts on the system as a result of the cumulative impact the reconfiguration of the zones and the additional 150 homes would have on the quantity of stormwater runoff and water quality of receiving environments.

Wastewater

There is also a question around the capacity of the infrastructure to cope with the additional wastewater as a result of the potential increase in the number of homes.



Both councils are well aware of a recent overflow of contaminated stormwater into the Ahuriri Estuary. We understand NCC saw fit to discharge that contaminated stormwater because of existing network capacity issues. Given there are already capacity issues within the existing network, we would caution against allowing further development (housing, sportsgrounds and increased impermeable areas) which would exacerbate existing deficiencies with the City Council's stormwater and wastewater networks.

We trust the City Council will see fit to undertake a detailed assessment of the capability of the existing infrastructure to ensure further incidences do not occur and we would ask that these findings be shared with HBRC so that we might make an informed comment in this regard.

Water management and limits in the Ahuriri Estuary catchment area

As noted above the secondary runoff is to be piped to the Ahuriri Estuary via the Purimu pump station through the existing consent for discharge. As a joint consent holder HBRC needs to understand what implications this could have on the Estuary.

The Draft Ahuriri Masterplan 2017 states that 'The Ahuriri Estuary is a nationally significant ecological environment' and due to its importance the health of the Estuary is at the heart of the plan, bringing a multi-layered approach to improving water quality and 'focusing on at-source treatment by end-of-line systems'. We are unclear how this objective is being delivered effectively through the Plan Change.

The TANK stakeholder group are currently in the process of developing a Regional Plan Change for the Tutaekuri, Ahuriri, Ngaruroro and Karamu catchments. Urban and industrial discharges of stormwater is an issue specifically considered by the TANK stakeholder group. In addition to this the Ahuriri Estuary has been identified by the Regional Council as one of its six 'hotspots' for targeted funding in its \$1 Million kick-start clean-up fund through the Annual Plan 2017-18.

Given the significance of the Estuary both at catchment and region level, it is imperative that its improved health is at the fore of decision making.

We suggest that discussions be held with HBRC's drainage asset managers regarding the conditions of the existing subdivision consent and what requirements have been (or anticipated to be) put in place from NCC (engineering code of practice), what is required in terms of stormwater design and treatment, and what low impact design principles will be applied within the subdivision development - for example, non-zinc roofing, appropriate treatment of stormwater from car park areas and roads etc. to reduce the potential contribution of contaminants to receiving environments, including the highly valued Ahuriri Estuary. Our highly experienced team of water quality scientists can also assist informing those discussions.

Natural Hazards

Since our previous correspondence to you in October 2017, the review of the region's liquefaction risk was adopted by the HB Liquefaction Risk Review Steering Group on the 2nd November 2017. Plan Change 11 has been reviewed by the Hawke's Bay Civil Defence Emergency Management Advisor, who has made the below advisory comments:

1. Liquefaction risk: The site is classified as having high liquefaction vulnerability. There is a probability of more than 50 percent that liquefaction-induced ground damage will be; moderate to severe for 500-year shaking, and; minor to moderate (or more) for 100-year shaking. Under the MBIE "Planning and engineering guidance for potentially liquefaction prone land" dated September 2017 Section 6.10 in areas assigned a liquefaction

category of high, it is recommended that a geotechnical engineer should provide input into the design of all buildings. This should include a site specific assessment of liquefaction issues, including assessment of new or existing subsurface ground investigations.

2. Tsunami inundation risk: The Hawke's Bay joint hazard strategy for local authority land-use planning (adopted by the HBCDEM Joint Committee) recommends provisions that support minimising risk to human lives including restricting location of critical facilities within these areas, and design, enhancement and protection of evacuation routes taken into account during new development such as roading infrastructure.

I would refer you to the Natural Hazards Property Report on the HB Hazard Portal should you require further information <https://hbhazards.intramaps.co.nz/IntraMaps/MapControls/HBHazards/NHDB/>

Closing comment

Thank you for the opportunity to make a submission on Plan Change 11. The Regional Council does wish to be heard in support of this submission, but do not wish to present a joint case with other submitters.

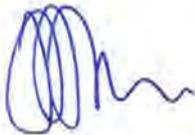
Regional Council representatives would welcome further discussion with Napier City Council to continue better alignment of our relative positions on land use and water management in the Ahuriri catchment, particularly those raised in our submission above.

The Regional Council's address for service in relation to this submission is:

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Should you have any queries with regards to the content of this submission please do not hesitate to contact Ceri Edmonds, as above.

Yours sincerely



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