

27 September 2019

Hastings District Council  
Private Bag 9002  
**HASTINGS 4156**

Attn: Rowan Wallis

Via email to [policyteam@hdc.govt.nz](mailto:policyteam@hdc.govt.nz)

Dear Mr Wallis

### **Submission on Proposed District Plan Variation 7 by Hastings District – Seasonal Workers Accommodation**

Thank you for the opportunity to make a submission on proposed Variation 7 to the Hastings District Plan. HBRC generally supports Variation 7 (V7) but wish to make the following comments.

#### Heretaunga Plains Urban Development Strategy

As you are aware, Hastings District Council, Napier City Council and the Regional Council are partners to the Heretaunga Plains Urban Development Strategy (HPUDS). We support V7 insofar as it will enable provision of different forms of housing and living environments to meet some of the demands for residential accommodation in the wider Hastings/Napier area.

The Regional Council also supports the inclusion of provisions intended to stop unnecessary urban development encroachment on versatile soils of the Heretaunga Plains in accordance with provisions of the Regional Policy Statement (RPS), namely POL UD1.

#### Stormwater and wastewater provisions

The Heretaunga Plain Unconfined Aquifer and the Hastings drinking water Source Protection Zone overlay with areas of the Plains Production Zone and Industrial Zones which fall within the scope of V7 (utilising the HBRC Heretaunga Plains Groundwater numerical model which is proposed within the TANK Plan Change (PC9)). Although provision is given for connection to existing stormwater and wastewater infrastructure, we believe that deeper acknowledgement and consideration of potential risks to the unconfined aquifer and the Hastings drinking water source protection zone is required. HBRC also wish to ensure that there is capacity within the current District Council network for such developments and that the District Council is able to consider the cumulative impact of developments.

Industrial areas of Omahu Road and Irongate - we understand that both wastewater and stormwater can be provided for by the District Council network at Omahu Road. Meanwhile at Irongate, albeit maximum wastewater discharge volume is limited as per 14.1.6A.10, it too can be provided for by the District Council's network. However stormwater must be provided

for on-site. For ease of use by potential applicants, we request that this is made more explicit through appropriate performance standards and terms, assessment criteria or advice notes.

We note that there is reference within this section of the District Plan to contamination risk from industrial uses and development (Policies IPZ7, IPZ18) but note that there is nothing within Variation 7 about contamination arising from the RSE accommodation. It is considered that there is opportunity to consider contamination risk and appropriate management in more detail. The potential contamination issues are not just limited to the built form in terms of ground floor area and impervious surfaces, but also from the density of people proposed to reside within the accommodation and the impacts from their activities, such as car parking, car washing, waste collection and disposal etc. As well as the increased areas of impervious surfaces resulting in increased stormwater runoff and potential overflows from wastewater networks into stormwater if capacity becomes an issue.

Ideally, we would like to see Hastings District Council extend reticulated systems to service RSE developments to remove the need to discharge into these sensitive receiving environments. For the purposes of V7, we request that Hastings District Council include Advice Notes highlighting the need for applicants to seek resource consents from the Regional Council in regards to wastewater and stormwater discharges.

We also note that wastewater discharges from RSE facilities can be relatively large, and that if consent is to be granted for these, a high standard of wastewater treatment is likely to be required where these discharges occur over the unconfined aquifer or within SPZ's. HBRC is also cognisant that there will be cumulative effects from discharges of this nature, and that consent may be granted where the discharge will have, or contribute to adverse environmental effects.

**OUTCOME: Applicants have a clear understanding of stormwater and wastewater requirements and groundwater and drinking water quality is protected.**

On 25 September 2019, the Hawke's Bay Regional Council agreed to publically notify Plan Change 9 (commonly referred to as the "TANK" Plan Change, encompassing the Tūtaekurī, Ahuriri, Ngaruroro and Karamu catchments). We believe it would be opportune for Hastings District Council to ensure that any changes made through this Variation align with the proposed TANK Plan Change, insofar as is practicable given the Plan Change is not yet notified. There is opportunity to provide wording in 14.1.8.4 similar to that within TANK Policy 6 b):

- b) regulating activities within the unconfined aquifer that may actually or potentially affect the quality of the source water or present a risk to the supply of safe drinking water because of;*
  - (i) direct or indirect discharge of a contaminant to the source water including by overland flow or percolation to groundwater;*
  - (ii) an increased risk to the safety of the water supply as a result of a non-routine event*
  - (iii) potentially impacting on the level or type of treatment required to maintain the safety of the water supply;*

- (iv) *shortening or quickening the connection between contaminants and the source water, including damage to a confining layer;*
- (v) *in the case of groundwater abstraction, the rate or volume of abstractions causing a change in groundwater flow direction or speed and/ or a change in hydrostatic pressure that is more than minor*

**OUTCOME: Regional and District plan provisions are aligned.**

Provision of drinking water

We recognise that the residents of these types of development will require provision of drinking water. It is uncertain whether Seasonal Workers Accommodation developments are to be accommodated by municipal supply or on-site provision. As you will be aware, the Heretaunga Aquifer is currently over-allocated and, in accordance with RPS OBJ LW1 2B<sup>1</sup>, over-allocation is being phased out through the TANK Plan Change.

If it is not possible for RSE developments to join the municipal supply, we request that Hastings District Council include an Advice Note highlighting that applicants may need to transfer an existing permit or provide drinking water within existing consented allocations. Furthermore it would be advisable to note to applicants that the provision of drinking water will need to meet the requirements of the NZ Drinking Water Standards and Health Act.

**OUTCOME: RSE accommodation is appropriately serviced and groundwater quantity is maintained.**

The Regional Council wishes to be heard in support of this submission and does not wish to present a joint submission.

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

Hawke's Bay Regional Council  
159 Dalton Street  
Private Bag 6006  
Napier 4110  
Attn: Ellen Humphries  
Phone: 06 835 9200 extn. 9379  
Email: [ellen.humphries@hbrc.govt.nz](mailto:ellen.humphries@hbrc.govt.nz)

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

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<sup>1</sup> Integrated management of fresh water and land use and development Fresh water and the effects of land use and development are managed in an integrated and sustainable manner which includes... establishing where over-allocation exists, avoiding any further over-allocation of freshwater and phasing out existing over-allocation.

Yours sincerely



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