

Chapter: STOR – Stormwater Management

Feed-back No.	Section	Sub-section	Plan Provision	Feedback	Relief sought
87.4	STOR – Stormwater management	General		<p>Oppose</p> <p>It is clear from the objectives and policies of the chapter that the provisions relate to the management of stormwater discharges to Council’s reticulated stormwater system.</p> <p>However, Rules SW-R3 and SW-R4 have the potential to capture activities that are not reticulated to the Council network and which operate a separate stormwater management system in accordance with a regional resource consent.</p> <p>██████████ requests amendments to these rules to clarify that they do not apply to unreticulated stormwater discharges that are discharged in accordance with a regional resource consent.</p>	<p>In the Introduction, include the following sentence:</p> <p>The provisions of this chapter do not apply to activities that hold a resource consent from the Canterbury Regional Council pursuant to the relevant regional plan that regulates stormwater discharges.</p>
143.31	STOR – Stormwater management	General		<p><i>Stormwater management</i></p> <ul style="list-style-type: none"> · <i>Ensure provisions relating to stormwater quality and quantity align with national directions</i> · <i>The provisions seek to ensure stormwater is managed in a way that existing public network capacity is maintained, inclusive of stormwater quantity neutrality and avoid flooding risk on other properties, and stormwater quality effects are minimised, inclusive of avoiding use of specified cladding / roofing materials.</i> · <i>Methods include a permitted activity regime for new developments that establish over 30m² and up to 500m² of impervious area on a site, over 500m² and 70% of the net site area overall, subject to the provision of detention systems, rainwater storage tanks and network authority approval.</i> · <i>The network authority approval process includes both quality and quantity parameters for private connections to the public network, under standards SW-S3 and SW-S4.</i> 	<ul style="list-style-type: none"> · ██████████ seek the removal of standards associated with the use of particular building materials in new developments, to trigger resource consent. · ██████████ seek a simpler regime for when rainwater storage systems are required in residential developments.

				<ul style="list-style-type: none"> · <i>In addition, rule SW-R5 imposes a non-complying activity status for use of “any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof material, gutters, downpipes or external cladding of buildings or structures”.</i> <p><i>Stormwater management</i></p> <ul style="list-style-type: none"> · <i>██████████ acknowledges the need for the Council to comply with the Canterbury Land and Water Plan requirements around quality and quantity and the need to employ methods to manage quantity and quality-based effects. However, in relation to qualitative methods, ██████████ query whether it is effective or efficient to manage these effects on site/development basis, or whether the Council (as network utility operator) should be addressing these effects on a catchment / network basis. It is acknowledged that residential zones are not subject to qualitative methods. In relation to quantitative methods, the use of stormwater neutrality methods that provide certainty for developments involving up to 500m² of additional impervious areas is not opposed, but ██████████ would seek a simpler regime for when rainwater storage systems are required in residential developments (e.g. fewer iterations of tank sizes).</i> · <i>Finally, the control of particular materials is questioned and not considered to be an efficient or effective RMA method.</i> · <i>██████████ would seek further information provided to ascertain if the approach being taken is fair and reasonable (i.e. copies of any relevant consents from Environment Canterbury that may inform the approaches being taken).</i> 	
83.30	STOR – Stormwater management	General	General	<p>██████████ support the intent of Chapter STOR to trigger consent for increases in impervious coverage. It is understood that this applies to new impervious areas only, rather than replacement of existing (for instance if existing hardstanding is resealed).</p>	
86.5	STOR – Stormwater management	General	General	<p><i>It is clear from the objectives and policies of the chapter that the provisions are to manage stormwater discharges to the Council reticulated system.</i></p> <p><i>However, SW-R3 and SW-R4 have the potential to catch activities that are not reticulated to the Council network and operate a stormwater management system in accordance with a regional consent.</i></p>	<p>██████████ suggests that following changes to the chapter:</p> <p>In the Introduction, include the following sentence:</p>

					<p>The provisions of this chapter do not apply to activities that hold resource consent from the Canterbury Regional Council pursuant to the relevant regional plan.</p> <p>In both SW-R3 and SW-R4, include the following note:</p> <p>This rule does not apply to activities that hold resource consent from the Canterbury Regional Council pursuant to the relevant regional plan.</p>
43.14	STOR – Stormwater management	Policies	SW-P2 Water quality For stormwater	<p><i>Retain clause (1) as proposed or preserve the original intent.</i></p> <p><i>We support the use of this clause to improve stormwater quality and hence improve water quality outcomes in a way that the regional council is unlikely to be able to do unless resource consent for stormwater discharge is required.</i></p>	
72.13	STOR – Stormwater management	Policies	SW-P2 Water quality	<p><i>Stormwater is a direct conduit to our rivers, lakes and ocean and can have adverse effects on property and the environment if not managed appropriately. Both in the objective and policies related to stormwater, water quantity and water quality, direction on stormwater neutrality or improvements and water quality treatment for impervious surfaces is referred to, but there is nothing that looks to encourage better stormwater management in terms of capturing or slowing stormwater through permeable designs. How stormwater is managed impacts our waterways and built environment. Urban or semi-urban practices around paved areas, rooves and other impervious surfaces pollute waterways, increase flooding, and degrade habitat. The loss of vegetation to make way for impervious surfaces can increase air and water temperatures. Sustainable stormwater management is an alternative to the traditional piped approach and can be more cost effective and attractive. It can address erosion, water pollution, and other stormwater runoff issues all at once. ██████ would like to see a more progressive approach to stormwater design and policies directing stormwater management that acknowledges the effects</i></p>	

				<i>of climate change and decreasing groundwater levels, and that improves water quality and habitat.</i>	
43.12	STOR – Stormwater management	Policies	SW-P1 Stormwater quantity neutrality	<i>Retain as proposed or preserve the original intent.</i>	
83.31	STOR – Stormwater management	Policies	Require all subdivision, use and development to connect to the Council's reticulated stormwater network within reticulated infrastructure boundaries,	<p><i>Oppose.</i></p> <p><i>Policy SW-P3(2) requires the avoidance of stormwater quality impacts. ██████████ seek to ensure that the policy framework enables discharges which are of an acceptable quality (rather than the blanket avoidance of all and any quality impacts). By way of example, a greenfield subdivision would not be able to meet the policy as drafted as there would always be a level of impact on stormwater quality.</i></p> <p><i>Similarly, the required percentage reductions in contaminants will likely not be achievable where stormwater is low in particular contaminants to begin with. For instance, how would a discharger reduce trace levels of zinc by more than 70% and what would be the effect to justify that level of treatment? In terms of ██████████ ██████████ would support an approach that recognised the MfE Guidelines^[1] as good practice and required compliance with the same for discharges to reticulated networks.</i></p> <p>^[1] ██████████</p>	

	managem ent				
37.1	STOR – Stormwat er managem ent	Rules	SW-R5 The use of any copper, galvanise d metal, unpainte d zincalum e or any other unpainte d metal, used in roof material, gutters, downpip es or extern	<i>I beleive cooper is unoffensive as a material on the roof, as guttering or used as cladding. It will weather to a soft brown/green colour which is totally inkeeping with the environment. Some of the latest award winning architecture is clad with cooper in highly visual sensitve locations.</i>	
68.17	STOR – Stormwat er managem ent	Rules	SW-R5 The use of any copper, galvanise d meta	<i>This really is unenforceable. How is council going to make sure such materials remain in a painted state, and how is council going to manage the suitability of the paint used?</i>	
90.2	STOR – Stormwat er managem ent	Rules	SW-R5 The use of any copper, galvanise d meta	<i>Oppose</i> <i>SW-R5 directly relates to roof cladding.</i> <i>Apart from colorsteel, the remaining roof claddings commonly used are galvanised or zincalume which will now be non-complying activities. This becomes impractical and significantly restricts construction materials used throughout the District. No justification or evidence for such provisions</i>	

				<p>are located in the Objectives and Policies that directly relate to human health and the environment which cause any hazards greater to what is prevalent with other materials.</p> <p><i>Solution:</i></p> <p>SW-R5</p> <p>We request Council omit "Zincalume" from the SW-R5.</p>				
141.93	STOR – Stormwater management	Rules	SW-R5 The use of any copper, galvanised metal	<table border="1"> <tr> <td>SW-R5 Use of metal materials</td> <td>Oppose</td> <td>The rule makes use of any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof material, gutters, downpipes or external cladding of buildings or structures a non-complying activity. This would make many farm buildings non-complying even though they are not feeding into the reticulated stormwater system.</td> </tr> </table>	SW-R5 Use of metal materials	Oppose	The rule makes use of any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof material, gutters, downpipes or external cladding of buildings or structures a non-complying activity. This would make many farm buildings non-complying even though they are not feeding into the reticulated stormwater system.	Amend SW-R5 to exclude the General Rural Zone.
SW-R5 Use of metal materials	Oppose	The rule makes use of any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof material, gutters, downpipes or external cladding of buildings or structures a non-complying activity. This would make many farm buildings non-complying even though they are not feeding into the reticulated stormwater system.						
90.1	STOR – Stormwater management	Rules	SW-R1 All developments, other than a road, t	<p><i>Oppose</i></p> <p>SW-R1 relates to between 30m2 and 500m2 of new impervious surfaces.</p> <p>Per-3 and Per-4 states that it needs to meet both SW-S1 and SW-S2 which is the minimum tank size and stormwater neutrality.</p> <p>Upon investigation with Council Engineers, it is understood that the intention with the Rule was to be one or the other. The reason being is that the tank sizing specified should ensure stormwater neutrality is achieved.</p> <p><i>Solution:</i></p> <p>SW-R1</p>				

				<i>We request Council amend the provision to be SW-S1 or SW-S2.</i>	
87.5	STOR – Stormwater management	Rules	SW-R3 All developments, other than a road, t	<p><i>In both Rules SW-R3 and SW-R4, include the following note:</i></p> <p><i>This rule does not apply to activities that hold a resource consent from the Canterbury Regional Council pursuant to the relevant regional plan that regulates stormwater discharges.</i></p>	<p>In both Rules SW-R3 and SW-R4, include the following note:</p> <p>This rule does not apply to activities that hold a resource consent from the Canterbury Regional Council pursuant to the relevant regional plan that regulates stormwater discharges.</p>
87.6	STOR – Stormwater management	Rules	SW-R4 Any maintenance or upgrading of the ro	<p><i>In both Rules SW-R3 and SW-R4, include the following note:</i></p> <p><i>This rule does not apply to activities that hold a resource consent from the Canterbury Regional Council pursuant to the relevant regional plan that regulates stormwater discharges.</i></p>	<p>In both Rules SW-R3 and SW-R4, include the following note:</p> <p>This rule does not apply to activities that hold a resource consent from the Canterbury Regional Council pursuant to the relevant regional plan that regulates stormwater discharges.</p>
149.2	STOR – Stormwater management	Standards	SW-S2 Stormwater neutrality	<p><i>The 30m2 threshold for new impermeable surfaces in Stormwater management chapter requires resource consent that would mean a lot of unnecessary applications.</i></p> <p>• [REDACTED]</p> <p>[REDACTED]</p>	

			devices or systems	[REDACTED]	
149.3	STOR – Stormwater management	Standards	SW-S4 Stormwater quality permission requirement	<p><i>Is use of Zinc and Copper materials going to need resource consent?</i></p> <p>[REDACTED]</p>	
100.6	STOR – Stormwater management	SW-R5 The use of any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof material, gutters, downpipes or ext	General	<p><i>SW-R5: The use of any copper, galvanised metal, unpainted zincalume or any other unpainted metal, used in roof material, gutters, downpipes or external cladding of buildings or structures</i></p> <p><i>For all zones, status is non-complying.</i></p> <p><i>Oppose. This is excessive especially for farm buildings. While Queenstown Lakes District Council and the Southland District Plan have rules for reflectivity in metal materials etc, these are not overly restrictive, and only apply in discrete areas such as ONFs and ONLs.</i></p>	