

Form 5

Submission on Publicly Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter: Canterbury Regional Council (Environment Canterbury)

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Plan Change 21 to the Timaru District Plan – Brouchs Gully Outline Development Plan

Environment Canterbury ~~could~~/could not* gain an advantage in trade competition through this submission.

~~*I am/am not directly affected by an effect of the subject matter of the submission that—
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.~~

The specific provisions of the proposal that Environment Canterbury's submission relates to are:

- The entire plan change
- Policy 2.1.2.2
- Policy 2.4.2.4
- Rule 5.B.2

Environment Canterbury's submission is:

Environment Canterbury supports the introduction of an outline development plan (ODP) for Brouchs Gully.

The Canterbury Regional Policy Statement (RPS) requires efficient integration between land use and infrastructure. PC 21 is clearly directed at achieving this integration. Introducing an

ODP into the District Plan will ensure that the land can be developed in an efficient way, and is well serviced.

We support the inclusion of specific performance standards that control the area of hard surfacing, treatment of runoff by infiltration systems, and the roofing materials used on individual sites. The inclusion of two stormwater retention ponds and associated swales in the ODP are consistent with the requirements of the Canterbury Land and Water Regional Plan for land-based treatment systems.

The land covered by the plan change is part of the Waitarakao / Washdyke catchment. The lagoon has a long history of cultural significance to local rūnanga as an important site for traditional food gathering. It is covered by a Mātaitai reserve. The lagoon and catchment is also home to a variety of wading birds and waterfowl and is an important link in the network of coastal wetlands in Canterbury.

The lagoon is classified as “at risk” in the nutrient allocation zones in the Land and Water Plan. Water quality is influenced by the management of contaminants in the catchment and the management of the drainage infrastructure. Ongoing coastal retreat and hydrology changes in the catchment, including the effects of climate change on sea-level rise and groundwater levels, will put increasing pressure on the functioning of the lagoon over time.

The changes to the Plan introduced by PC21 do not explicitly mention the need to maintain and preferably enhance the environmental outcomes for Waitarakao / Washdyke Lagoon. This means that in the event of a resource consent being sought for a proposal that doesn't conform to the ODP or meet the performance standards for stormwater, there is no specific policy direction to consider the outcomes for the lagoon. Rather the matters to consider are focussed on the efficient provision and coordination of infrastructure.

We request that the plan change include appropriate policies to ensure that consideration is given to the outcomes for the Lagoon.

With respect to the list of possible techniques for treating the first flush of rainfall in a storm event listed in Rule 5.A.2, we do not consider that catchpit filter inserts should be included. These do not achieve the desired water quality outcomes, as they capture only gross pollutants and coarse sediments

We also note that the stormwater modelling attached to the plan change focuses on the rate of stormwater discharge to the lagoon. The stormwater consent will also need to show how the volume of stormwater discharged to the lagoon will be managed, so that hydraulic neutrality is maintained.

Environment Canterbury seeks the following decision from the local authority:

Amend Explanation to Existing Policy 2.1.2.2

Development of this area in general accordance with the ODP will ensure:

- *efficient development of urban zoned land to provide housing choice;*
- *provision of sewer and stormwater infrastructure on a coordinated basis;*
- *provision of a connected, safe, and efficient roading network;*
- *the avoidance of new roading and access connections to major roads;*

- *the avoidance of adverse effects (including reverse sensitivity effects) on the National Grid;*
- *the avoidance of adverse effects on the water quality and hydraulic functioning of Waitarakao / Washdyke lagoon.*

Add New Policy 2.4.2.5

Ensure that stormwater resulting from development in the Residential 1 and 4 Zones at Broughts Gully (as set out in Appendix C of Part D 2) does not contribute to further degradation of water quality, aquatic ecosystems and mahinga kai, and the hydraulic functioning of the Waitarakao / Washdyke lagoon.

Or alternatively -

Amend New Policy 2.4.2.4

Ensure that development in the Residential 1 and 4 zones at Broughts Gully (as set out in Appendix C of Part D2 is efficient, coordinated and supported by adequate services, and is in general accordance with the roading and servicing layout shown in Appendix C, and that stormwater discharges do not contribute to further degradation of water quality, aquatic ecosystems and mahinga kai, and the hydraulic functioning of the Waitarakao / Washdyke lagoon.

Amend Rule 5.A.2

The runoff from the first 15mm of rainfall in any storm event (regardless of duration) from any impervious or hardstand surfaces (excluding roofs) shall be treated before discharging to a reticulated network. The treatment shall be by infiltration systems, which may include but is not limited to:

- *Infiltration basins*
- *Rain Gardens*
- *Permeable Pavement*
- *Constructed Wetlands*
- ~~*Catchpit Filter Insert*~~

Environment Canterbury wish ~~(or do not wish)~~ to be heard in support of our submission.

*If others make a similar submission, we will consider presenting a joint case with them at a hearing.

Carmel Rowlands
Team Leader Planning

(Authorised under delegated authority from the Canterbury Regional Council)

Date: 17/02/17

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