
Submission on Napier City Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Napier City Council - Planning Unit

Date received: 15/12/2023

Submission Reference Number #:287

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

Submitter:

Son Nguyen

Address for service:

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Attachments:

submission-2614.pdf

I wish to be heard: No

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you 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

- **Yes**

Submission points

Point 287.1

Section: SW - Stormwater

Sub-section: Policies

Provision: General

Sentiment: Amend

Submission:

The policies should emphasize the importance of managing stormwater runoff from **'industrial and trade sites'** which are potentially significant sources of contamination. These sites may have significant storage of chemicals and operations that generate contaminants such as suspended solids, oil and grease and heavy metals.

Relief sought

Add policy

SW-P6: Industrial and Trade Sites

Minimize contaminants in [stormwater](#) being discharged to the reticulated [stormwater](#) network by:

- a. requiring treatment of run-off from new development or redevelopment of industrial and trade sites and
 - b. requiring a Site Specific Stormwater Management Plan for industrial and trade sites with more than 1,000 m2 of impervious areas
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Point 287.2

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision: General

Sentiment: Amend

Submission:

Add rule about stormwater discharge from industrial and trade sites

Relief sought

Add rule:

SW-R6: Any development of new or redevelopment of industrial and trade sites

Activity Status: Permitted

Where:

1. The maximum impervious area is less than 1000m2
 2. [Development of new or redevelopment of existing impervious areas meets standard SW-S3](#)
 3. Stormwater run-off from the [impervious area](#) of the industrial and trade sites must be treated by an approved [stormwater](#) management device designed to remove sediments and contaminants prior to [discharge](#) into the [stormwater](#) network
 4. The approved [stormwater](#) management device must be maintained in good working order for the life of the device.
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Point 287.3

Section: SW - Stormwater

Sub-section: SW - Stormwater - Standards Table

Provision: General

Sentiment: Amend

Submission:

Add water quality standards

Relief sought

Add standard:

SW-S3: Stormwater Quality

1. The diversion and discharge of stormwater runoff must avoid:

- a. Producing conspicuous oil or grease films, scums or foams, or floatable or suspended materials
- b. Causing any conspicuous change in the colour or visual clarity
- c. Emitting objectional odour
- d. Rendering of fresh water unsuitable for consumption by farm animals or
- e. Causing any significant adverse effects on aquatic life
- f. Causing any permanent bed scouring or bank erosion at or beyond the point of discharge
- g. Causing flooding of any property
- h. Containing hazardous substances

All sites with a connection to a public stormwater network

Purpose : to reduce contaminants entering the stormwater network at source.

Point 287.4

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision:

SW-R2: Development of new or redevelopment of existing roads or state highways

SW-R2A

SW-R2B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

Matters of discretion are:

1. The road or state highway is designed to accommodate more than 5,000 vehicles per day;
2. Stormwater run-off from the total impervious area of the carriageway of the road or state highways must be treated by an approved stormwater management device(s) designed to remove sediments and contaminants prior to discharge into the stormwater network, or
3. The approved stormwater management device must be maintained in good working order for the life of the device.

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Note: Rules in the zone and/or precinct chapter and the Transport chapter may apply in addition to the above.

Sentiment: Amend

Submission:

Typo

Relief sought

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1. The road or state highway is designed to accommodate ~~less more~~ than 5,000 vehicles per day;

...

Point 287.5

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision:

SW-R3: Buildings, structures, and earthworks on sites with overland flow paths

SW-R3A

SW-R3B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

Matters of discretion are:

1. The existing entry and exit points of the overland flow path through the site are maintained and remain unobstructed, and
2. The building, structure, or earthworks will not decrease the capacity of the overland flow path entering the site or increase the volume of overland flow path exiting the site.

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Note:

1. Rules in the zone and/or precinct chapter and the Earthworks chapter may apply in addition to the above.
2. Indicative overland flow paths are identified in the District Plan Planning Maps.

Sentiment: Amend

Submission:

The buildings, structures and earthworks only affect the OLFPs if they are located within the OLFPs. Development on sites with OLFPs may not have any effects on the OLFPs if they are located clear of the OLFPs. The title wording need to be clearer.

New buildings and structures within OLFPs are risky as need to be assessed in detailed by a qualified professional. The activity status should be altered to "Restricted Discretionary"

Relief sought

SW-R3: Buildings, structures, and earthworks on sites ~~with~~ within overland flow paths SW-R3A

SW-R3A

Activity Status: ~~Permitted~~ Restricted Discretionary

~~Where:~~

1. ~~The existing entry and exit points of the overland flow path through the site are maintained and remain unobstructed, and~~
2. ~~The building structure, or earthworks, will not decrease the capacity of the overland flow path entering the site or increase the volume of overland flow path existing the site.~~

~~Note:~~

1. ~~Rules in the zone and/or precinct chapter and the Earthworks chapter may apply in addition to the above.~~
2. ~~Indicative overland flow paths are identified in the District Planning Maps.~~

SW-R3B

Activity Status where activity conditions are not met: Restricted Discretionary

Matters of discretion are:

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Point 287.6

Section: SW - Stormwater

Sub-section: Assessment criteria

Provision: General

Sentiment: Amend

Submission:

Add assessment criteria for development within OLFPs

Relief sought

Add

SW-AC3: Overland Flow Paths

For any earthworks, buildings or structures including retaining walls located within an overland flow path:

1. the effects of flooding on the activity proposed, including whether it is a more or less vulnerable activity;
 2. the effects on the location of habitable rooms;
 3. the design of the building and how it provides for safe access and the potential effects of flood hazards on chosen access routes; and
 4. the effects on people during a flood event and the ability to avoid, remedy or mitigate these.
 5. the obstruction of flows; and
 6. any change to location and capacity; and
 7. any changes in depth and velocity of flow; and
 8. any change to overland flow on other properties.
 9. the provision of alternative overland flow paths;
 10. the extent of any associated earthworks and
 11. the extent to which methods for long term maintenance of areas affected by flooding, such as easements, are provided.
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Point 287.7

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision:

SW-R5: Any development of new or redevelopment of existing impervious areas

SW-R5A

SW-R5B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

Matters of discretion are:

1. The maximum impervious area standard for the relevant zone or precinct is met, and
2. Development of new or redevelopment of existing impervious areas meets standard SW-S1.

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Sentiment: Amend

Submission:

It is important to exempt hydraulic mitigation for small increase in impervious area to avoid unnecessary red tap and costs. For example, adding a small hardstand area that complies with the maximum impervious area standards would have negligible effects on the stormwater system and should therefore be exempt from the hydraulic mitigation. It is our opinion that up to 50m² of impervious area should be exempted.

Relief sought

SW-R5A

Activity Status: Permitted

Where:

1. The maximum impervious area standard for the relevant zone or precinct is met, and
2. Development of new or redevelopment of existing impervious areas are less than 50m²
3. Development of new or redevelopment of existing impervious areas meets standard SW-S1

Point 287.8

Section: SW - Stormwater

Sub-section: SW - Stormwater - Standards Table

Provision:

SW-S1: Hydraulic mitigation

All sites with a connection to a public stormwater network

***Purpose:** to reduce potential flooding hazards and optimise efficiency of the stormwater and drinking water networks.*

1. Provide retention (volume reduction) of at least 10 mm runoff depth for the impervious area for which hydrology mitigation is required (refer to Figure 1).
2. Provide detention (temporary storage) and a drain down period of 24 hours for the difference between the pre-development and post-development run-off volumes from the 10% AEP, 24-hour rainfall event (refer to Figure 3 below, Table 9 of the Napier City Council Code of Practice for Land Development and Subdivision Infrastructure*) minus the 10 mm retention volume or any greater retention volume that is achieved over the impervious area for which hydrology mitigation is required (refer to Figure 2).

Matters of discretion are:

1. Purpose of the standard;
2. Public health and safety;
3. Network efficiency and resilience;
4. Receiving environment values, and
5. Use of low impact design.

***Note:** As at August 2021, the rainfall depth for the 10% AEP 24 hour duration event is 139 mm.

3. All retention and detention to be provided within the site boundary.
4. Where stormwater management devices including stormwater detention and/or

retention tanks are provided, an operation and maintenance plan is required to be lodged with, and approved by Napier City Council that addresses:

- i. how the whole site and specific equipment/features are operated and maintained with respect to stormwater;
 - ii. personnel responsibilities, treatment method(s), treatment requirements;
 - iii. mitigation of pollutants (gross, soluble, and suspended);
 - iv. location(s) of treatment and conveyance systems;
 - v. the maintenance schedule for the specific equipment/features included on the site;
 - vi. the design parameters and limitations of the specific equipment/features, and
 - vii. the design calculations for the specific equipment/features.
5. The operation and maintenance manual will be enforced through a consent notice on the title to ensure future property owners are aware of the maintenance obligations for the stormwater management device.
 6. For the purpose of this standard, the impervious area for which hydrology mitigation is required is any new or redeveloped impervious area undertaken since the date this rule becomes operative.

Sentiment: Amend

Submission:

This rule should only apply to development of new or redevelopment of existing impervious areas that are more than 50m²

Relief sought

For development of new or redevelopment of existing impervious areas that are more than 50m²:

1. Provide retention (volume reduction) of at least 10 mm runoff depth for the impervious area for which hydrology mitigation is required (refer to Figure 1).
2. Provide detention (temporary storage) and a drain down period of 24 hours for the difference between the pre-development and post-development run-off volumes from the 10% AEP, 24-hour rainfall event (refer to Figure 3 below, Table 9 of the Napier City Council Code of Practice for Land Development and Subdivision Infrastructure*) minus the 10 mm retention volume or any greater retention volume that is achieved over the impervious area for which hydrology mitigation is required (refer to Figure 2).

Point 287.9

Section: SUB - Subdivision

Sub-section: SUB - Subdivision - Standards Table

Provision:

SUB-S13: Stormwater treatment and disposal

All zones**Matters of discretion:**

1. For allotments capable of containing a building, each allotment must be designed to manage the treatment, containment, and disposal of stormwater from all impervious or potentially impervious surfaces in accordance with the Code of Practice for Land Development and Subdivision Infrastructure.
 2. The means for treatment, containment, and disposal of stormwater must incorporate low impact design principles in accordance with the Code of Practice for Land Development and Subdivision Infrastructure. This will include the use of swale drains, rain gardens, rain tanks, detention tanks, re-use systems, and other methods to minimise stormwater run-off.
 3. Where the means of stormwater disposal is to ground, that area of disposal must not be subject to instability, slippage, or inundation or be used for the disposal of wastewater.
1. Infrastructure servicing;
 2. Public health and safety;
 3. Compliance with the Code of Practice for Land Development and Subdivision Infrastructure, and
 4. Environmental benefits (including ecological benefits of the proposed design for stormwater treatment and disposal).

Sentiment: Amend**Submission:**

The stormwater design is specific to the site including the extent of the roof and paved area. It is difficult to design the stormwater management without the site specific information. This standard need to be reviewed.

Relief sought

To be confirmed.

Submission on Napier City Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Napier City Council - District Planning

Date started: 15/12/2023

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

Address for service:

Angela McFlynn
PO Box 13036 Mahora Hastings 4155
New Zealand
Email: angela@mcflynnsurveying.co.nz

I wish to be heard: No

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- No

Are you 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

- Yes

Submission points

Point .

Section: SW - Stormwater

Sub-section: Policies

Sentiment: Amend

Submission:

The policies should emphasize the importance of managing stormwater runoff from '**industrial and trade sites**' which are potentially significant sources of contamination. These sites may have significant storage of chemicals and operations that generate contaminants such as suspended

solids, oil and grease and heavy metals.

Relief sought

Add policy

SW-P6: Industrial and Trade Sites

Minimize contaminants in [stormwater](#) being discharged to the reticulated [stormwater](#) network by:

- a. requiring treatment of run-off from new development or redevelopment of industrial and trade sites and
 - b. requiring a Site Specific Stormwater Management Plan for industrial and trade sites with more than 1,000 m² of impervious areas
-

Point .

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Sentiment: Amend

Submission:

Add rule about stormwater discharge from industrial and trade sites

Relief sought

Add rule:

SW-R6: Any development of new or redevelopment of industrial and trade sites

Activity Status: Permitted

Where:

1. The maximum impervious area is less than 1000m²
 2. [Development of new or redevelopment of existing impervious areas meets standard SW-S3](#)
 3. Stormwater run-off from the [impervious area](#) of the industrial and trade sites must be treated by an approved [stormwater](#) management device designed to remove sediments and contaminants prior to [discharge](#) into the [stormwater](#) network
 4. The approved [stormwater](#) management device must be maintained in good working order for the life of the device.
-

Point .

Section: SW - Stormwater

Sub-section: SW - Stormwater - Standards Table

Sentiment: Amend

Submission:

Add water quality standards

Relief sought

Add standard

SW-S3: Stormwater Quality

All sites with a connection to a public [stormwater network](#)

***Purpose:** to reduce contaminants entering the [stormwater network](#) at source.*

1. The diversion and discharge of stormwater runoff must avoid:
 - a. Producing conspicuous oil or grease films, scums or foams, or floatable or suspended materials
 - b. Causing any conspicuous change in the colour or visual clarity
 - c. Emitting objectional odour
 - d. Rendering of fresh water unsuitable for consumption by farm animals or
 - e. Causing any significant adverse effects on aquatic life
 - f. Causing any permanent bed scouring or bank erosion at or beyond the point of discharge
 - g. Causing flooding of any property
 - h. Containing hazardous substances

Point .

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision:

SW-R2: Development of new or redevelopment of existing roads or state highways

SW-R2A

SW-R2B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

Matters of discretion are:

1. The road or state highway is designed to accommodate more than 5,000 vehicles per day;
 2. Stormwater run-off from the total impervious area of the carriageway of the road or state highways must be treated by an approved stormwater management device(s) designed to remove sediments and contaminants prior to discharge into the stormwater network, or
 3. The approved stormwater management device must be maintained in good working order for the life of the device.
1. Public health and safety;
 2. Network efficiency, and
 3. Effects on the values of the receiving environment.

Note: Rules in the zone and/or precinct chapter and the Transport chapter may apply in addition to the above.

Sentiment: Amend

Submission:

Typo

Relief sought

SW-R2: Development of new or redevelopment of existing roads or state highways

SW-R2A

SW-R2B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

1. The road or state highway is designed to accommodate ~~more~~ less than 5,000 vehicles per day;
2. Stormwater run-off from the total impervious area of the carriageway of the road or state highways must be treated by an approved stormwater management device(s) designed to remove sediments and contaminants prior to discharge into the stormwater network, or
3. The approved stormwater management device must be maintained in good working order for the life of the device.

Matters of discretion are:

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Note: Rules in the zone and/or precinct chapter and the Transport chapter may apply in addition to the above.

Point .

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision:

SW-R3: Buildings, structures, and earthworks on sites with overland flow paths

SW-R3A

SW-R3B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

Matters of discretion are:

1. The existing entry and exit points of the overland flow path through the site are maintained and remain unobstructed, and
2. The building, structure, or earthworks will not decrease the capacity of the overland flow path entering the site or increase the volume of overland flow path exiting the site.

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Note:

1. Rules in the zone and/or precinct chapter and the Earthworks chapter may apply in addition to the above.
2. Indicative overland flow paths are identified in the District Plan Planning Maps.

Sentiment: Amend

Submission:

The buildings, structures and earthworks only affect the OLFPs if they are located within the OLFPs. Development on sites with OLFPs may not have any effects on the OLFPs if they are located clear of the OLFPs. The title wording need to be clearer.

New buildings and structures within OLFPs are risky as need to be assessed in detailed by a qualified professional. The activity status should be altered to "Restricted Discretionary"

Relief sought

SW-R3: Buildings, structures, and earthworks on sites ~~with~~ within overland flow paths

SW-R3A

Activity Status: ~~Permitted~~ Restricted Discretionary

SW-R3B

Where:

-

Activity Status where activity conditions are not met: Restricted Discretionary

1. ~~The existing entry and exit points of the overland flow path through the site are maintained and remain unobstructed, and~~
2. ~~The building, structure, or earthworks will not decrease the capacity of the overland flow path entering the site or increase the volume of overland flow path exiting the site.~~

Matters of discretion are:

1. Public health and safety;
2. Network efficiency, and
3. Effects on the values of the receiving environment.

Note:

-

1. ~~Rules in the zone and/or precinct chapter and the Earthworks chapter may apply in addition to the above.~~
2. ~~Indicative overland flow paths are identified in the District Plan Planning Maps.~~

Point .

Section: SW - Stormwater

Sub-section: Assessment criteria

Sentiment: Amend

Submission:

Add assessment criteria for development within OLFPs

Relief sought

Add

SW-AC3: Overland Flow Paths

For any earthworks, buildings or structures including retaining walls located within an overland flow path:

1. the effects of flooding on the activity proposed, including whether it is a more or less vulnerable activity;
 2. the effects on the location of habitable rooms;
 3. the design of the building and how it provides for safe access and the potential effects of flood hazards on chosen access routes; and
 4. the effects on people during a flood event and the ability to avoid, remedy or mitigate these.
5. the obstruction of flows; and
 6. any change to location and capacity; and
 7. any changes in depth and velocity of flow; and
 8. any change to overland flow on other properties.
 9. the provision of alternative overland flow paths;
 10. the extent of any associated earthworks and
 11. the extent to which methods for long term maintenance of areas affected by flooding, such as easements, are provided.

Point .

Section: SW - Stormwater

Sub-section: SW - Stormwater - Rules Table

Provision:

SW-R5: Any development of new or redevelopment of existing impervious areas

SW-R5A

SW-R5B

Activity Status: Permitted

Activity Status where activity conditions are not met: Restricted Discretionary

Where:

Matters of discretion are:

- | | |
|--|--|
| <ol style="list-style-type: none"> 1. The maximum impervious area standard for the relevant zone or precinct is met, and 2. Development of new or redevelopment of existing impervious areas meets standard SW-S1. | <ol style="list-style-type: none"> 1. Public health and safety; 2. Network efficiency, and 3. Effects on the values of the receiving environment. |
|--|--|

Sentiment: Amend

Submission:

It is important to exempt hydraulic mitigation for small increase in impervious area to avoid unnecessary red tap and costs. For example, adding a small hardstand area that complies with the maximum impervious area standards would have negligible effects on the stormwater system and should therefore be exempt from the hydraulic mitigation. It is our opinion that up to 50m2 of impervious area should be exempted.

Relief sought

SW-R5A

Activity Status: Permitted

Where:

1. The maximum impervious area standard for the relevant zone or precinct is met, and
2. Development of new or redevelopment of existing impervious areas are less than 50m²
3. Development of new or redevelopment of existing impervious areas meets standard SW-S1

Point .

Section: SW - Stormwater

Sub-section: SW - Stormwater - Standards Table

Provision:

SW-S1: Hydraulic mitigation

All sites with a connection to a public stormwater network

***Purpose:** to reduce potential flooding hazards and optimise efficiency of the stormwater and drinking water networks.*

1. Provide retention (volume reduction) of at least 10 mm runoff depth for the impervious area for which hydrology mitigation is required (refer to Figure 1).
2. Provide detention (temporary storage) and a drain down period of 24 hours for the difference between the pre-development and post-development run-off volumes from the 10% AEP, 24-hour rainfall event (refer to Figure 3 below, Table 9 of the Napier City Council Code of Practice for Land Development and Subdivision Infrastructure*) minus the 10 mm retention volume or any greater retention volume that is achieved over the impervious area for which hydrology mitigation is required (refer to Figure 2).

Matters of discretion are:

1. Purpose of the standard;
2. Public health and safety;
3. Network efficiency and resilience;
4. Receiving environment values, and
5. Use of low impact design.

***Note:** As at August 2021, the rainfall depth for the 10% AEP 24 hour duration event is 139 mm.

3. All retention and detention to be provided within the site boundary.
4. Where stormwater management devices including stormwater detention and/or retention tanks are provided, an operation and maintenance plan is required to be lodged with, and approved by Napier City Council that addresses:
 - i. how the whole site and specific equipment/features are operated and maintained with respect to stormwater;
 - ii. personnel responsibilities, treatment method(s), treatment requirements;
 - iii. mitigation of pollutants (gross, soluble, and suspended);
 - iv. location(s) of treatment and conveyance systems;
 - v. the maintenance schedule for the specific

- equipment/features included on the site;
 - vi. the design parameters and limitations of the specific equipment/features, and
 - vii. the design calculations for the specific equipment/features.
5. The operation and maintenance manual will be enforced through a consent notice on the title to ensure future property owners are aware of the maintenance obligations for the stormwater management device.
6. For the purpose of this standard, the impervious area for which hydrology mitigation is required is any new or redeveloped impervious area undertaken since the date this rule becomes operative.

Sentiment: Amend

Submission:

This rule should only apply to development of new or redevelopment of existing impervious areas that are more than 50m²

Relief sought

For development of new or redevelopment of existing impervious areas that are more than 50m²:

1. Provide retention (volume reduction) of at least 10 mm runoff depth for the impervious area for which hydrology mitigation is required (refer to Figure 1).
2. Provide detention (temporary storage) and a drain down period of 24 hours for the difference between the pre-development and post-development run-off volumes from the 10% AEP, 24-hour rainfall event (refer to Figure 3 below, Table 9 of the Napier City Council Code of Practice for Land Development and Subdivision Infrastructure*) minus the 10 mm retention volume or any greater retention volume that is achieved over the impervious area for which hydrology mitigation is required (refer to Figure 2).

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Point .

Section: SUB - Subdivision

Sub-section: SUB - Subdivision - Standards Table

Provision:

SUB-S13: Stormwater treatment and disposal

All zones

Matters of discretion:

1. For allotments capable of containing a building, each allotment must be designed to manage the treatment, containment, and disposal of stormwater from all impervious or potentially impervious surfaces in accordance with the Code of Practice for Land Development and Subdivision Infrastructure.
 2. The means for treatment, containment, and disposal of stormwater must incorporate low impact design principles in accordance with the Code of Practice for Land Development and Subdivision Infrastructure. This will include the use of swale drains, rain gardens, rain tanks, detention tanks, re-use systems, and other methods to minimise stormwater run-off.
 3. Where the means of stormwater disposal is to ground, that area of disposal must not be subject to instability, slippage, or inundation or be used for the disposal of wastewater.
1. Infrastructure servicing;
 2. Public health and safety;
 3. Compliance with the Code of Practice for Land Development and Subdivision Infrastructure, and
 4. Environmental benefits (including ecological benefits of the proposed design for stormwater treatment and disposal).

Sentiment: Amend

Submission:

The stormwater design is specific to the site including the extent of the roof and paved area. It is difficult to design the stormwater management without the site specific information. This standard need to be reviewed.

Relief sought

to be confirmed

DRAFT