

SW - Stormwater

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /SW - Stormwater /	Lance Simon	27.1	Amend	The submitter considers that the District Plan be amended to reference the desirability of Cross Boundary collaboration between Hastings District Council and Hawkes Bay Regional Council in order to implement Esk River flood protection improvements to protect Bayview residents / infrastructure etc, from future flooding of the Esk River.	The submitter considers that the District Plan be amended to include reference to the desirability of Cross Boundary collaboration between Hastings District Council and Hawke's Bay Regional Council in order to implement Esk River flood protection improvements to protect Bayview residents / infrastructure etc. from future flooding of the Esk River. (Inferred decision requested)	Open Submission
SW - Stormwater /Issues /SW-12: Impacts on the receiving environment	Wayne Ormsby	63.7	Amend	Seeks to amend SW-12 to make provision for more nature-based stormwater solutions. Seeks to amend site coverage thresholds to 40% of the development site for all large scale housing and commercial developments. Seeks to include, as a condition of resource consent, nature-based stormwater solutions such as rain gardens and first flush systems. Seeks to work alongside Council and Mana Ahuriri Trust on a Stormwater Strategy.	Amend SW-12 to make provision for more nature-based stormwater solutions. Amend site coverage thresholds to 40% of the development site for all large scale housing and commercial developments. Include, as a condition of resource consent, nature-based stormwater solutions such as rain gardens and first flush systems. Taiwhenua to work alongside Council and Mana Ahuriri Trust on a Stormwater Strategy.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Catherine Hawkins	148.4	Amend	Concerns the increasing flow of stormwater runoff from more intensive housing developments into the Taipo Stream, and the potential this creates to flood nearby homes. Council should consider this potential effect when assessing applications for intensified housing developments and residents should have the opportunity to have a say.	Ensure Council considers runoff into Taipo Stream from housing developments. Enable residents to have a say on intensified housing developments. Minimise hard surfaces for developments where they discharge to the Taipo Stream.	Open Submission
SW - Stormwater /Issues /SW-11: Providing for growth of the city while recognising constraints in the stormwater network	- Angie Denby	149.1	Amend	Amend SW-11 to highlight the need to treat stormwater onsite before it reaches the estuary or the proposed Ahuriri Regional Park. High rise more intense development places pressure on an already stressed stormwater infrastructure system. Council needs to comply with the low impact stormwater techniques used for car park areas. Nutrient loads and toxins are rising in Napier's urban waterways; how we this be addressed and monitored, and how will the toxins from a first flush system be managed? How will Council address the emergency release of sewage to the estuary?	Amend SW-11 to consider matters relating to onsite treatment of stormwater, and recognition of the rising toxin/nutrient levels in urban waterways. Seeks to prevent high density residential development until stormwater can be appropriately managed. Seeks to ensure first flush toxins can be appropriately managed. Requests the re-activation of the UWWG, training for Council engineers on low impact design stormwater solutions, and the prevention of emergency release of sewage into the Ahuriri Estuary.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Tom Anderson	151.41	Amend	Notes that Regulation 57 of NESTF exempts regulated activities from District Plan natural hazard rules because resilience is already factored into industry practice, and they will either avoid hazard areas or engineer structures to be resilient to the hazard risk due to industry practice referred to in the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 Users' Guide Industry practices mean that telecommunication companies rely on local authorities to identify hazards and have resilience requirements. Telecommunication network resilience includes avoiding hazards and designing infrastructure for resilience under the Civil Defence Emergency Management Act 2002 (CDEMA). Notes that Telecommunication network resilience comes from a variety of ways and is constantly evolving and learning from the events response assessments. Automatic failover arrangements ensure connectivity during emergencies. The Building Code does mandate standards around critical buildings housing telecommunications equipment though design standards for other components of the network, such as mobile facilities, are not prescribed. Crown Infrastructure Partners as part of Government managed initiatives such as ultra-fast (UFB 1 & 2) and rural broadband infrastructure (RBI 1 & 2) rollouts or the Blackspots initiative, does have a prescribed construction standard. Although there is no network construction standard outside those contractually managed by Crown Infrastructure Partners, the telecommunication companies constantly review their networks. Regulatory oversight includes Commerce Commission monitoring and MBIE regulations. Some councils, like Kaikoura, have accepted the exemption of telecommunication networks from further regulation.Consistency between NESTF regulated activities and other telecommunication activities should be maintained by exempting telecommunication networks from stormwater provisions in the PDP. Refer to original submission for full details	Amend the rule so that it clearly exempts activities associated with telecommunication networks as follows: <u>This rule do not apply to activities associated with telecommunication networks.</u>	Open Submission
SW - Stormwater /Policies /SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network	Sheena McGuire	168.47	Support	Supports provisions for on-site stormwater management to pre- development levels or connection to the public reticulated system. Seek to ensure neighbouring development does not result in stormwater discharge onto the rail corridor which can compromise the safe and efficient operation of the rail network.	Retain as proposed.	Open Submission
SW - Stormwater /Policies /SW-P3: Overland flow paths	Sheena McGuire	168.48	Support	Supports policy direction to maintain overland flow path capacity to ensure stormwater flows safely without causing damage to property including rail infrastructure.	Retain as proposed.	Open Submission

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SW - Stormwater /Objectives /SW-01: Public health and safety	Susan Elaine Macdonald	178.2	Amend	Disagrees with the rezoning of Napier South and Marewa to High Density Residential Zone. Despite proposed upgrades of stormwater, submitter has concerns that stormwater run-off from extra housing will overload stormwater infrastructure. Notes that 70% of Napier's stormwater runs into Ahuriri Estuary, housing infill will increase this. Concerned with the level of treatment of stormwater before it enters the estuary. Higher and more dense buildings will spoil the aesthetics of the suburbs. Seeks that consents for buildings in the HDR Zone be notifiable. Supports the proposed fencing rules as lower fences allow people on the footpath to see when vehicles are coming out of properties.	Relief Sought is not included, however it is inferred that the submitter seeks that the proposal to rezone Napier South and Marewa HRZ be rejected. It is also inferred that the submitter seeks that buildings within the HRZ be notifiable. It is also inferred that the submitter seeks the approval of the proposal relating to front fences.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Cameron Drury	179.5	Oppose	The number of car parks should not trigger the need for consent. Requiring resource consent for any carpark more than 10 spaces is an inefficient method to achieve stormwater quality objectives. Further, there are no standards to measure compliance with (2) against. There is no clarity as to what would be an "approved" stormwater management device.	Delete rule. Consider if outcomes are best achieved through the Stormwater Bylaw or Code of Practice rather than a resource consent process. Alternatively, amend the rule to remove the 10 car park trigger for consent and improve clarity on the expected stormwater treatment.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Cameron Drury	179.6	Amend	The current drafting of the rule effectively requires roads designed to accommodate less than 5,000 vehicle per day to seek resource consent under SW-R2B. Further, there are no standards to measure compliance with (2) against.	Delete rule and consider if outcomes are best achieved through the Stormwater Bylaw or Code of Practice. Alternatively, amend rule to improve clarity of when permitted activity conditions would be met.	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Cameron Drury	179.19	Amend	Significant loss of land and cost for larger development. There needs to be balance between private and public response, and options for when on-site solutions are not a practicable option. Implementation under (5) is not possible without subdivision.	Amend	Open Submission
SW - Stormwater /Assessment criteria /SW-AC1: All activities requiring consent in this chapter	Cameron Drury	179.22	Amend	Significant and costly expert assessment would be required to satisfy many of the criteria – increasing resource consenting costs. Too greater / onerous assessment on the wider environment being imposed on individual resource consent applicants.	Review and focus the criteria	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Mark Leggett	180.3	Oppose	Considers and disputes the applicability of Rule SW-R5 and Standard SW-1 to PORTZ Zone sites given their proximity to the receiving environment, absence of connection to the wider stormwater network and the low likelihood that they are contributors to flood risk. Considers on-site retention impractical in intensely developed environment and that on-site detention serves no purpose. Notes that impervious surface limits are not imposed for PORTZ Zone, unlike in other regions like in Aucklands Unitary Plan. Notes that the section 32 report gives cursory consideration to specific stormwater management areas, favoring a broad-brush approach. Considers that the blanket imposition of such controls fails to account for the specific characteristics of areas such as the Port. Seeks exemption from Rule SW-R5 and Standard SW-1with respect to sites located in the PORTZ Zone.	Amend Rule SW-R5 and Standard SW-1 to include (in both instances) the following exemption: <u>'This rule / standard does not apply to sites located in the PORTZ – Port Zone.'</u>	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Mark Leggett	180.4	Oppose	Considers and disputes the applicability of Rule SW-R5 and Standard SW-S1 to PORTZ Zone sites given their proximity to the receiving environment, absence of connection to the wider stormwater network and the low likelihood that they are contributors to flood risk. Considers on-site retention impractical in intensely developed environment and that on-site detention serves no purpose. Notes that impervious surface limits are not imposed for PORTZ Zone, unlike in other regions like in Aucklands Unitary Plan. Notes that the section 32 report gives cursory consideration to specific stormwater management areas, favoring a broad-brush approach. Considers that the blanket imposition of such controls fails to account for the specific characteristics of areas such as the Port. Seeks exemption from Rule SW-R5 and Standard SW-1with respect to sites located in the PORTZ Zone.	Amend Rule SW-R5 and Standard SW-S1 to include (in both instances) the following exemption: <u>'This rule / standard does not apply to sites located in the PORTZ – Port Zone.'</u>	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Angela McFlynn	189.7	Oppose	The submitter considers the Permitted Activity Standard will be unable to be complied with for any new development and / or redevelopment of land that is not also subject to a subdivision consent, as it is not possible for a consent notice to be registered on a title outside of the subdivision process. The requirements as a whole are considered excessive and likely cost-prohibitive for minor site works, such as new footpaths or outdoor paved areas, and if strictly enforced would ultimately lead to the decline of amenity as property owners would not undertake property maintenance works that involved the development and / or redevelopment of impervious surfaces.	Delete Standard SW-S1: Hydraulic mitigation, and consequentially also amend Rule SW-R5: Any development of new or redevelopment of existing impervious areas to reflect that this Standard has been deleted.	Open Submission
SW - Stormwater /Issues /SW-I1: Providing for growth of the city while recognising constraints in the stormwater network	Darryl Furness	200.6	Amend	Amend High Density Residential Zones (HRZ) and Medium Density Residential Zones (MRZ) especially the zoning of Elbourne street, due to directly effecting the submitter. Is against the proposal as due its impact on the health and wellbeing of residents. Has concerns of increased noise, loss of character, increased traffic, parking, loss of trees and greenspace, sunlight, privacy, loss of community, increased anti-social behaviour, the capability of wastewater systems, and liquefaction risk. Also mentions the healthcare system and its ability to cope with an increased population.Has concerns about current wastewater systems ability to cope now, referring to Cyclone Gabrielle. Increased population will exacerbate an already big issue.	Relief Sought is not included.	Open Submission

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SW - Stormwater /Policies /SW-P6: Operation and maintenance	Grant Russell	202.10	Oppose	Considers SW - Stormwater SW-P6: Operation and maintenance reference to 'in perpetuity' is inappropriate. Meeting required performance standards is considered a more practical timebound measure.	Amend SW - Stormwater SW-P6: Operation and maintenance as follows: Require onsite stormwater management methods including detention tanks, raingardens, and stormwater filters to be: a. maintained in perpetuity to ensure the required performance standard is achieved.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Grant Russell	202.11	Amend	Considers SW-R2: Development of new or redevelopment of existing roads or state highways requires further clarification of the stormwater management device lifespan in the wording.	Amend SW-R2: Development of new or redevelopment of existing roads or state highways as follows: 3. The approved stormwater management device must be maintained in good working order for the life-specified manufacturing date of the device.	Open Submission
SW - Stormwater /Assessment criteria /SW-AC1: All activities requiring consent in this chapter	Grant Russell	202.12	Oppose	The submitter considers they want to be consulted with as to how SW-AC1 relates with the NCC Stormwater Bylaw 2020 in order to avoid unnecessary duplication of process.	Seeks consultation with NCC as to how SW-AC1 relates with the NCC Stormwater Bylaw 2020 in order to avoid unnecessary duplication of process.	Open Submission
SW - Stormwater /Assessment criteria /SW-AC2: Low impact design	Grant Russell	202.13	Oppose	The submitter considers they want to be consulted with as to how SW-AC2 relates with the NCC Stormwater Bylaw 2020 in order to avoid unnecessary duplication of process.	Seeks consultation with NCC as to how SW-AC2: Low impact design relates with the NCC Stormwater Bylaw 2020 in order to avoid unnecessary duplication of process.	Open Submission
SW - Stormwater /Introduction /General	Georgina McPherson	215.49	Amend	It would assist plan users in the introduction to further clarify the relationship between the approval processes under these documents, particularly approval processes under the District Plan and Bylaw and whether these are intended to work in tandem, or provide an alternative pathway and whether applicants should seek approval under either the District Plan or Stormwater Bylaw first or at the same time. It would also assist plan users to provide additional clarification of the distinction between activities that will be subject to regulation at a district level and at a regional level. There is duplication with regional plan requirements and any such duplication is opposed as inappropriate and unnecessary.	Amend the introduction to the stormwater chapter to provide further guidance to plan users on the relationship between: - the District Plan, Napier City Council Code of Practice for Land Development and Subdivision Infrastructure, and the Napier City Council Stormwater Bylaw in managing stormwater, and the anticipated application process; and the new stormwater management provisions in the Proposed Plan and those already contained in the Hawke's Bay Regional Resource Management Plan (RRMP) and to clarify that stormwater discharges from industrial and trade premises are appropriately regulated under the RRMP with no need to duplicate the regulation of discharges from such sites at a district level through the Proposed Plan.	Open Submission
SW - Stormwater /Objectives /SW-O1: Public health and safety	Georgina McPherson	215.50	Support	The Fuel Companies support the intent of SW-O1 and seek that it is retained as notified.	Retain SW-O1 as notified.	Open Submission
SW - Stormwater /Objectives /SW-O3: Receiving environment	Georgina McPherson	215.51	Amend	While the intent of the objective is acknowledged, the requirement in clause a) to entirely avoid further degradation of receiving environments is opposed as too absolute and unlikely to be able to be achieved.	Amend SW-O3 to remove the requirement for absolute avoidance of the degradation of receiving environments. This could be achieved by amending the wording as follows or with changes to the same effect: SW-O3: Receiving environmentStormwater discharges into Napier's stormwater network are managed to: a. avoid <u>slow the rate of</u> further degradation of theecological health of the network's receiving environments; b. progressively improve the mauri of freshwater and coastal water in the network's receiving environments over time to enable traditional and cultural use of this resource by mana whenua, and c. assist Napier City Council in meeting the requirements of its comprehensive networkdischarge consent for the stormwater network.	Open Submission

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SW - Stormwater /Policies /SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network	Georgina McPherson	215.52	Amend	The intent of the policy is supported. However, the wording should be amended to clarify that it applies only to development and redevelopment of impervious areas within a site, being the parts of a site from which stormwater runoff will occur.	Amend SW-P1 to clarify that it applies to development or redevelopment of impervious areas of a site only, using the term 'redevelopment of impervious area' as defined in the plan. This could be achieved by making the following changes or to the same effect: SW-P1 Onsite detention in existing urban areas with a connection to a public stormwater network Stormwater quantity is efficiently managed by requiring on site stormwater attenuation to pre-development levels for any development or redevelopment of <u>impervious areas on a site</u> that has a connection to a public stormwater network.	Open Submission
SW - Stormwater /Policies /SW-P3: Overland flow paths	Georgina McPherson	215.53	Amend	The Fuel Companies support the intent of this policy, however request that the conditions are amended to clarify that this rule relates only to new buildings and structures.	Retain SW-P3.	Open Submission
SW - Stormwater /Policies /SW-P4: Low impact design	Georgina McPherson	215.54	Amend	The Fuel Companies support the intent of this policy; however, they note that the technical or operational requirements of some activities may mean it is not possible to minimize impervious areas to the extent possible.	Amend SW-P4 as follows: SW-P4: Low impact design Where resource consent is required for subdivision, new buildings, and/or multi-unit development, manage stormwater run-off at source and through low-impact design techniques including: a. minimisation of impervious areas <u>to the extent practicable</u> ; b. retention of natural vegetation and green spaces; c. selection of plant species appropriate for the climate; d. replication of natural processes such as the filtering properties of soils and vegetation; e. improvement of biodiversity and other values, and f. treatment of first-flush through natural and/or engineered methods before discharge to the network.	Open Submission
SW - Stormwater /Policies /SW-P5: Roofs, car parks, and roads	Georgina McPherson	215.55	Amend	Clause b of SW-P5 refers to treating runoff from new large-scale open car parks and roads accommodating high volumes of traffic. The wording does not reflect the associated rules (SW-R1 and SW-R2) which also apply to redevelopment of these areas. Nor is there any certainty as to the scale of the areas to which the policy is intended to apply, albeit it is assumed the intent is to align with the thresholds set out in rules SW-R1 and SW-R2.	Amend Policy SW-P5 to provide greater certainty as the types of activities to which it is intended to apply. This could be achieved by making amendments along the following lines: SW-P5: Roofs, car parks, and roads Minimise contaminants in stormwater being discharged to the reticulated stormwater network by: a. requiring inert roofing materials and restricting the use of inert and toxic materials and paints on roofs, and b. requiring treatment of run-off from new large-scale open-uncovered car parks of more than 20 spaces and roads designed to accommodate more than 5,000 vehicles per day during construction or redevelopment high volumes of traffic .	Open Submission

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SW - Stormwater /SW - Stormwater - Rules Table	Georgina McPherson	215.56	Amend	The Fuel Companies are not opposed to the treatment of stormwater run-off from uncovered car parking areas. However, the threshold of 10 car park spaces proposed by Rule SW-R1 is considered too low for a rule that would apply generally to all car parking areas across the district. There is no evidence base for the selection of this threshold. Plan Change 9 to the Hawke's Bay Regional Resource Management Plan (RRMP) has introduced specific consenting requirements for the discharge of stormwater from industrial or trade premises (Rule TANK 24 in the decisions version of PC9), including implementation of a Stormwater Management Plan in accordance with Schedule 33 of the RRMP that addresses stormwater treatment devices. Avoid unnecessary duplication. There are additional uncertainties in the requirements eg what is an appropriate stormwater management device. See full submission for more detail.	<p>Amend SW-R1 to increase the threshold at which stormwater treatment is required from 10 to 20 car parking spaces and to clarify;</p> <ul style="list-style-type: none"> - the thresholds expected to be achieved by the stormwater treatment device; - that the rule applies to discharges to the reticulated network only; - that activities otherwise excluded from the definition of 'redevelopment of impervious areas' are also excluded from this rule. <p>This could be achieved by making the following changes or changes to the same effect: SW-R1: Development of new or redevelopment of existing uncovered car parks <u>where stormwater discharge is to the reticulated stormwater network</u> SW-R1A Activity Status: Permitted Where:</p> <ol style="list-style-type: none"> 1. The car park provides for no more than ten <u>twenty</u> car park spaces, or 2. Stormwater run-off from the total impervious area of the carpark and access ways must be treated by an approved <u>approved-authorized</u> stormwater management device designed to accommodate and treat stormwater from the uncovered car park remove sediments and contaminants prior to discharge into the stormwater network, and or 3. The approved-authorized stormwater management device must be maintained in good working order for the life of the device; and 4. <u>The device or system must be sized and designed in accordance with 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'; or</u> 5. <u>Where alternative devices are proposed, the device the device must demonstrate it is designed to achieve an equivalent level of contaminant</u> <p><u>or sediment removal performance to that of 'Guidance Document 2017/001 Stormwater Management Devices in the Auckland Region (GD01)'. (GD01)'. except that Rule SW-R1 does not apply to the following activities:</u></p> <ul style="list-style-type: none"> i <u>Stormwater discharges from industrial or trade premises that are otherwise regulated by the Hawke's Bay Regional Resource Management Plan; and</u> ii <u>Activities that are otherwise excluded from the definition of redevelopment of impervious area as follows:</u> <ul style="list-style-type: none"> a. <u>Maintenance or repairs that do not increase the total impervious area of the site, or result in any additional contaminant discharge;</u> b. <u>Resurfacing that does not involve the re- direction of existing stormwater flows or drainage networks;</u> c. <u>Trenching and resurfacing associated with the installation, maintenance, repair and replacement of underground equipment, infrastructure or underground utility works</u> d. <u>Installation, maintenance, repair or upgrade of above ground network utilities, including electric vehicle charging facilities, having a gross floor area of no more than 3.5m2.</u> 	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Georgina McPherson	215.57	Amend	The Fuel Companies support the intent of this rule, however, seek that it be clarified that this applies to 'new' buildings, structure and earthworks. The wording of this rule currently has no distinction between new or existing buildings, so suggests that it captures existing buildings and structures which have been lawfully established.	<p>Amend SW-R3 as follows:</p> <p>SW-R3:NewBuildings, structures, and earthworks on sites with overland flow paths</p> <p>Activity status: Permitted Where:</p> <ol style="list-style-type: none"> 1. The existing entry and exit points of the overland flow path through the site are maintained and remain unobstructed, and 2. The <u>Any new</u> 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. 	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Georgina McPherson	215.58	Support	The Fuel Companies are supportive of SW-R4 and seek that it is retained as notified.	Retain SW-R4 as notified.	Open Submission

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SW - Stormwater /SW - Stormwater - Rules Table	Georgina McPherson	215.59	Amend	<p>As identified in relation to SW-R1, the Fuel Companies seek to ensure the threshold at which the trigger for implementation of hydraulic mitigation is set is reasonable and represents an efficient use of resources, particularly where it relates to retrofitting of mitigation measures to existing impermeable areas. As currently drafted, the rule will be triggered for any redevelopment of existing impervious surfaces, as there is no clear link to the defined term 'redevelopment of existing impervious areas', which provides some limited exclusions. As a minimum, the rule should be amended to clarify that activities that are excluded from the definition of redevelopment of impervious areas will not trigger the hydraulic mitigation requirements of Rule SW-R5 and SW-S1.</p> <p>Further, as currently drafted, SW-R1 will trigger a requirement to implement the hydraulic mitigation measures set out in SW-S1 for the creation of any new impervious surfaces, even as little as 1m2, across the entire district, or obtain a Restricted Discretionary activity consent where the hydraulic mitigation requirements of SW-S1 are not met. This threshold is considered too low and unduly onerous. It is also considered the rule should be amended to clarify whether or not it applies to the development of new or redevelopment of existing impervious surfaces associated with new or existing roads or state highways.</p>	<p>Amend SW-R5 as follows: SW-R5: Any development of new or redevelopment of existing impervious areas where stormwater is <u>discharged to the reticulated stormwater network</u> SW-R5A Activity Status: Permitted Where: 1. <u>The activity involves development of new or redevelopment of existing impervious areas up to 50m2; or</u> 2. <u>The maximum impervious area standard for the relevant zone or precinct is met, and</u> 2. <u>Development of new or redevelopment of existing impervious areas greater than 50m2 meets standard SW-S1 except that Rule SW-R5 does not apply to the following activities:</u> i <u>Activities that are otherwise excluded from the definition of redevelopment of impervious area as follows:</u> a. <u>Maintenance or repairs that do not increase the total impervious area of the site, or result in any additional contaminant discharge;</u> b. <u>Resurfacing that does not involve the re- direction of existing stormwater flows or drainage networks;</u> c. <u>Trenching and resurfacing associated with the installation, maintenance, repair and replacement of underground equipment, infrastructure or underground utility works</u> d. <u>Installation, maintenance, repair or upgrade of above ground network utilities, including electric vehicle charging facilities, having a gross floor area of no more than 3.5m2.</u> Note: <u>For the avoidance of doubt, Rule SW-R5 applies to any development of new or redevelopment of impervious surfaces associated with new or existing roads or state highways.</u></p>	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Georgina McPherson	215.60	Amend	<p>The Fuel Companies have a number of concerns with SW-S1 (See full submission for more detail). The approach recommended in the Napier City Stormwater Master Plan 2020 Stantec report as fit-for purpose and consider Clause 2 should be amended to reflect this recommendation, noting that no technical justification is provided for the wording currently proposed in Clause 2. Clause 3 requirements don't provide for a comprehensive approach to managing stormwater, such as may be provided as part of a subdivision or integrated development, where stormwater runoff from a number of different properties is managed in a comprehensive manner. Clauses 4 ii), iii) and iv) all make reference to quality treatment. These requirements are inappropriate in the context of a standard that has the specific purpose of managing stormwater quantity and should be deleted. The requirement to register the ongoing maintenance and operation of stormwater management devices on titles is considered unnecessary and unduly onerous.</p>	<p>Amend SW-S1 to address the concerns raised by the Fuel Companies and provide greater certainty and clarity as to the purpose and effect of the standard. This could be achieved by making changes along the following lines:</p> <p>SW-S1: Hydraulic mitigation All sites with a connection to a public stormwater network 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 Stormwater runoff generated from development in a 1 in 10- year rainfall event with a 24-hour duration, should be detained on-site and discharged to the public stormwater network in a manner that it is limited to the pre-development peak runoff rate (refer to Figure 2). *Note: As at August 2021, the rainfall depth for the 10% AEP 24 hour duration event is 139 mm.</p> <p>3. All retention and detention to be provided: (i) within the site boundary; or (ii) <u>by an authorised off-site stormwater management device or system where the system is designed, constructed and operated to receive and manage stormwater from the impervious area of the site.</u></p>	Open Submission

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					<p>A copy of the authorisation (such as a discharge consent or subdivision consent notice on title) must be provided to the Council, along with confirmation from the operator of the device or system that hydrology mitigation requirements will be achieved for the additional stormwater from the site.</p> <p>4. Where stormwater management devices including stormwater detention and/or retention tanks are provided, 'as built plans' for the device or system together with an operation and maintenance plan is required to be lodged with, and approved by Napier City Council that addresses:</p> <ol style="list-style-type: none"> how the whole site and specific equipment/features are operated and maintained with respect to stormwater; personnel responsibilities, treatment method(s), treatment requirements; mitigation of pollutants (gross, soluble, and suspended); location(s) of retention and detention devices treatment and conveyance systems; the maintenance schedule for the specific equipment/feature included on the site; the design parameters and limitations of the specific equipment/features, and the design calculations for the specific equipment/features. <p>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. Any stormwater management device or system must be operated and maintained in accordance with best practice for the device or system.</p> <p>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.</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> Purpose of the standard; Public health and safety; Network efficiency and resilience; Receiving environment values, and Use of low impact design, and <u>The practicality and limitations of applying hydraulic mitigation to the site taking into account site and operational constraints, the requirements for other utilities or infrastructure.</u> 	
SW - Stormwater /SW - Stormwater - Standards Table	Georgina McPherson	215.61	Support	The Fuel Companies are supportive of SW-S2 and seek that it is retained as notified.	Retain SW-S2 as notified.	Open Submission
SW - Stormwater /Assessment criteria /SW-AC1: All activities requiring consent in this chapter	Georgina McPherson	215.62	Amend	The Fuel Companies support the intent of the Assessment Criteria under SW-AC1. However, the wording specifies that the criteria apply to all activities requiring consent in this chapter. It is important to ensure the wording of the assessment criteria does not require assessment against a criterion that is no relevant to the matter for which consent is required.	<p>Amend the wording of SW-AC1 to ensure activities requiring consent only need to be assessed against matters of relevance to the reason for consent. This could be achieved by making changes along the following lines:</p> <p>Assessment criteria SW-C1: All activities requiring consent in this chapter ...</p> <p>Effects on the values of the receiving environment</p> <ol style="list-style-type: none"> Whether The extent to which any and nature of contaminants generated from the an activity for which management of stormwater quality is required will: <ol style="list-style-type: none"> adversely affect the ecological, cultural and recreational values of the stormwater network's receiving environments, and/or affect the ability for Napier City Council to meet the conditions of its comprehensive stormwater network discharge consent. The extent to which the any stormwater management device(s) proposed will be effective in removing the anticipated contaminants from the activity. The proposed methods for operating and maintaining the any proposed stormwater treatment processes and devices to ensure their continued and ongoing effectiveness in removing contaminants. The proposed methods for monitoring and reporting on the effectiveness of the any proposed treatment process. 	Open Submission
SW - Stormwater /Issues /SW-I1: Providing for growth of the city while recognising constraints in the stormwater network	Murray and Elly Buchanan	237.3	Oppose	Opposes the introduction of medium and high density residential zones. The existing SW network cannot cope with current levels of development and the SW it generates. Notes that with the change of government the Acts are being repealed while the NPS, if not also withdrawn, the inclusion of medium and high density zones to satisfy the requirements of the National Policy Statement is to be made voluntary for Councils to adopt.	Delete all the medium and high density residential provisions and replace with the existing residential zones.	Open Submission

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /Objectives /SW-02: Network efficiency	Maryanne Macintosh	243.5	Oppose	<p>Many Schools within MRZ are already up to capacity, submitter states children need space. Has concerns of Medium Density Residential Zones (MRZ) impacting quality of life. Living in an attractive environment with greenspace is important to people's well-being.</p> <p>Infrastructure is another concern, with reference to stormwater during the cyclone. Notes, Singapore's requirements for greenspaces, flooding of streets, grass is needed for water drainage, and a geyser in Elbourne Street.Considers safety of elderly important, with reference to break ins. Submitter states MRZ and HRZ makes it harder to know neighbours, creating a loss of connection.</p>	Relief Sought is not included.	Open Submission
SW - Stormwater /Objectives /SW-03: Receiving environment	Ella Shields Carmen Taylor	246.25	Support	Supports Objective SW-03: Receiving environment as the outcomes sought by this objective, in terms of striving to improve the quality of receiving environments that receive stormwater from the city's reticulated stormwater network, in accordance with the requirements of the Council's comprehensive network discharge consent, are appropriate.	Retain Objective SW-03 as notified.	Open Submission
SW - Stormwater /Policies /SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network	Ella Shields Carmen Taylor	246.26	Support	Supports Policy SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network as in the context of the risks associated with rainfall, particularly heavy rainfall, requiring rainfall / stormwater attenuation as proposed by this policy is considered appropriate.	Retain Policy SW-P1 as notified in its entirety.	Open Submission
SW - Stormwater /Policies /SW-P2: Stormwater management in greenfield growth areas	Ella Shields Carmen Taylor	246.27	Support	Supports SW-P2: Stormwater management in greenfield growth areas as this policy is likely to apply to stormwater management in the expanded industrial area sought by Ravensdown at Awatoto. It is appropriate as it recognises that onsite, or standalone, stormwater solutions can be established to support further development (Clause (b)(ii) of this Policy).	Retain Policy SW-P2 as notified.	Open Submission
SW - Stormwater /Policies /SW-P3: Overland flow paths	Ella Shields Carmen Taylor	246.28	Support	Supports Policy SW-P3: Overland flow paths as Overland flow paths are identified in the PDP as being associated with Ravensdown's Awatoto landholdings. In the context of the risks associated with rainfall, particularly heavy rainfall, requiring the maintenance of the capacity of these flow paths to pass stormwater flows safely is a sensible and appropriate approach.	Retain Policy SW-P3 as notified.	Open Submission
SW - Stormwater /Policies /SW-P4: Low impact design	Ella Shields Carmen Taylor	246.29	Amend	<p>Considers Policy SW-P4: Low impact design should be amended as there are two parts of this policy that need to be addressed further, namely Clauses (e) and (f) as discussed below.</p> <p>The policy relates to putting in place at source low-impact design solutions for stormwater. Clause (e), which refers to improving biodiversity and other values, is not consistent with the policy approach (or the structure of the policy). For this reason, this clause of the policy should be deleted. In relation to Clause (f), while supporting the proposed technique of providing for first-flush treatment of stormwater, via natural or engineered methods, the subsequent sole reference to discharging stormwater to a network does not reflect all of the options that available. As recognised by Policy SW-P2, the discharge of stormwater from a standalone system is also an option.</p>	<p>Amend Policy SW-P4 as follows:</p> <p>Where resource consent is required for subdivision, new buildings, and/or multi-unit development, manage stormwater run-off at source and through low-impact design techniques including:</p> <ol style="list-style-type: none"> minimisation of impervious areas; retention of natural vegetation and green spaces; selection of plant species appropriate for the climate; replication of natural processes such as the filtering properties of soils and vegetation; and improvement of biodiversity and other values, and treatment of first-flush through natural and/or engineered methods before discharge to the network <u>or from a standalone system.</u> 	Open Submission
SW - Stormwater /Policies /SW-P5: Roofs, car parks, and roads	Ella Shields Carmen Taylor	246.30	Support	Supports SW-P5: Roofs, car parks, and roads with an amendment as while supporting this policy, it is considered that the reference to discharging stormwater to a network does not reflect all of the options that are available. As recognised by Policy SW-P2, the discharge of stormwater from a standalone system is also an option.	<p>Amend Policy SW-P5 as follows:</p> <p>Minimise contaminants in stormwater being discharged to the reticulated stormwater network <u>or from standalone systems</u> by:</p> <ol style="list-style-type: none"> requiring inert roofing materials and restricting the use of inert and toxic materials and paints on roofs, and requiring treatment of run-off from new large-scale open car parks and roads designed to accommodate high volumes of traffic. 	Open Submission
SW - Stormwater /Policies /SW-P6: Operation and maintenance	Ella Shields Carmen Taylor	246.31	Support	The submitter supports Policy SW-P6: Operation and maintenance as it is agreed that where stormwater management methods are present within a site, they should be maintained and operational at all times, as required by this Policy.	Retain Policy SW-P6 as notified.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Ella Shields Carmen Taylor	246.32	Support	Supports SW - Stormwater - Rules Table Rule SW-R3: Buildings, structures, and earthworks on sites with overland flow paths as Overland flow paths are identified on the PDP's planning maps as being present on Ravensdown's landholdings at Awatoto. In this context, providing for development where overland flow paths are located as a permitted activity, subject to complying with the conditions proposed, is appropriate.	Retain Rule SW-R3 in its entirety as notified.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Ella Shields Carmen Taylor	246.33	Support	Supports Rule SW-R4: New buildings or any alteration to buildings as these provisions are an appropriate matter to consider when new buildings are being constructed or when existing buildings are being altered.	Retain Rule SW-R4 as notified.	Open Submission

SW - Stormwater

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /SW - Stormwater - Rules Table	Ella Shields Carmen Taylor	246.34	Support	Supports SW-R5: Any development of new or redevelopment of existing impervious areas as this Rule framework is supported, particularly given the definition of 'redevelopment of impervious areas', which clarifies that redevelopment of such areas includes the replacement or reconstruction of a site's lawfully established impervious area provided there is no increase in area, no additional contaminants or the re-redirection of existing stormwater flows or drainage networks.	Retain Rule SW-R5 as notified.	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Ella Shields Carmen Taylor	246.35	Support	Supports SW - Stormwater - Standards Table Standard SW-S1: Hydraulic mitigation as in relation to Rule SW-R5, this standard and the associated rule framework are supported.	Retain Standard SW-S1 as notified.	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Ella Shields Carmen Taylor	246.36	Support	Supports Standard SW-S2: Inert roofing as discussed above in relation to Rule SW-R4, this standard is supported.	Retain Standard SW-S2 as notified.	Open Submission
SW - Stormwater /Policies /SW-P4: Low impact design	Trevor Ellis	253.44	Support	Supports as SW-P4 gives effect to the NPS-FM and NPS-IB.	Retain as notified.	Open Submission
SW - Stormwater /Objectives /SW-O1: Public health and safety	Nichola Nicholson	264.12	Support	Supports the PDP's three stormwater-related objectives (SW-01, SW-02 and SW-03) and generally support the associated policies. As a consent authority, HBRC has granted discharge permits to the City Council for the collection, treatment and discharge of stormwater at various locations around the City. Wastewater contaminant overflows into the Ahuriri Estuary is particularly problematic. It is good to see that provisions in the PDP are aiming to support network improvements and better environmental outcomes for the highly valued Ahuriri Estuary.	No relief sought.	Open Submission
SW - Stormwater /Objectives /SW-O2: Network efficiency	Nichola Nicholson	264.19	Support	Supports the PDP's three stormwater-related objectives (SW-01, SW-02 and SW-03) and generally support the associated policies. As a consent authority, HBRC has granted discharge permits to the City Council for the collection, treatment and discharge of stormwater at various locations around the City. Wastewater contaminant overflows into the Ahuriri Estuary is particularly problematic. It is good to see that provisions in the PDP are aiming to support network improvements and better environmental outcomes for the highly valued Ahuriri Estuary.	No relief sought.	Open Submission
SW - Stormwater /Objectives /SW-O3: Receiving environment	Nichola Nicholson	264.20	Support	Supports the PDP's three stormwater-related objectives (SW-01, SW-02 and SW-03) and generally support the associated policies. As a consent authority, HBRC has granted discharge permits to the City Council for the collection, treatment and discharge of stormwater at various locations around the City. Wastewater contaminant overflows into the Ahuriri Estuary is particularly problematic. It is good to see that provisions in the PDP are aiming to support network improvements and better environmental outcomes for the highly valued Ahuriri Estuary.	No relief sought	Open Submission
SW - Stormwater /General /General	NZ Transport Agency Waka Kotahi Kelsey Watson	277.39	Amend	Acknowledges that Council seeks to manage the effects of land use development on the quality of the stormwater network, including discharge both into and out of this network. Notes that the state highway network across the region is extensive. The state highway stormwater infrastructure is designed for the capacity of this network only. Notes that its state highway stormwater network is therefore not designed to meet the demand of stormwater discharged from adjoining land use development. NZTA cannot accept responsibility for the discharge of contaminants by third parties into its network. Seeks for Council to ensure that stormwater is managed to ensure it does not compromise the state highway stormwater network.	Seeks for Council to manage land use development to meet the following requirement: <u>All stormwater runoff from impervious areas of adjoining property to a state highway is managed onsite at all times and does not enter the state highway network.</u>	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	NZ Transport Agency Waka Kotahi Kelsey Watson	277.40	Oppose	Opposes due to concerns over the implication of the application of this rule on the existing state highway network within Napier. NZTA have designations in place for maintenance and operations of the state highway network which would preclude us from this rule.	Excludes state highway urban carriageways where the runoff is discharged into the Napier City stormwater network.	Open Submission

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /Policies /SW-P4: Low impact design	Vanessa Moon	282.5	Support	Supports Stormwater SW-P4 Low Impact Design in the PDP, emphasizing minimization of impervious surfaces, retention of natural vegetation, selection of climate-appropriate plant species, replication of natural processes, enhancement of biodiversity, and treatment of first flush before discharge to the network.	<p>Submitter proposes the following options</p> <ul style="list-style-type: none"> - Implementing a system of open stormwater ditches to increase stormwater holding capacity in Jervoistown, potentially planted with appropriate vegetation for water filtration. - Creating detention tanks with wetland plantings, possibly utilizing undeveloped sections like Napier Street. - Replacing asphalt roads with permeable surfaces and lowering speed limits to 40 kph within Jervoistown. - Encouraging property owners to install retention tanks, soak pits, replace hard surfaces with landscaped areas, and plant gardens with native and exotic plants for cooling, flood mitigation, and biodiversity. - Considering locations for community gardens and urban farms in Jervoistown. - Exploring alternative waste management methods, such as composting toilets, with a system for composting waste and utilizing resulting products for agricultural purposes. <p>Notes their vision for Jervoistown: Foster community, biodiversity, climate-resilient water management, green Napier, and local food source. No specific relief sought. Refer to original submission for full details.</p>	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Kainga Ora - Brendon Liggett	285.23	Amend	Support the use of engineering techniques and the attenuation of stormwater on-site to control the potential effects of development on the stormwater network and the surrounding environment. However, the requirement to provide for retention systems (SW-S1), fails to acknowledge that this is just one potential solution for attenuation.	<p>Amend so that any requirement for retention be included as one solution but not necessarily the solution; i.e. soakage and detention systems could also be utilised to address potential effects of development.</p> <p>Any consequential changes necessary to give effect to the changes highlighted above or in the appendices attached.</p>	Open Submission
SW - Stormwater /Policies /General	Son Nguyen	287.1	Amend	Consider drafting policies to 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.	<p>Amend to include new policy:</p> <p><u>SW-P6: Industrial and Trade Sites</u> <u>Minimize contaminants in stormwater being discharged to the reticulated stormwater network by:</u> <u>a. requiring treatment of run-off from new development or redevelopment of industrial and trade sites and</u> <u>b. requiring a Site Specific Stormwater Management Plan for industrial and trade sites with more than 1,000 m2 of impervious areas</u></p>	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table /General	Son Nguyen	287.2	Amend	Considers the addition of a new rule about stormwater discharge from industrial and trade sites	<p>Add rule:</p> <p><u>SW-R6: Any development of new or redevelopment of industrial and trade sites</u> <u>Activity Status: Permitted</u> <u>Where:</u> <u>1. The maximum impervious area is less than 1000m2</u> <u>2. Development of new or redevelopment of existing impervious areas meets standard SW-S3</u> <u>3. Stormwater run-off from the impervious area of the industrial and trade sites must be treated by an</u> <u>approved stormwater management device designed to remove sediments and contaminants prior to discharge into the stormwater network</u> <u>4. The approved stormwater management device must be maintained in good working order for the life of the device.</u></p>	Open Submission

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /SW - Stormwater - Standards Table /General	Son Nguyen	287.3	Amend	Consider including addition stormwater quality standards	<p>Add standard:</p> <p><u>SW-S3: Stormwater Quality</u> <u>All sites with a connection to a public stormwater network</u></p> <p><u>Purpose : to reduce contaminants entering the stormwater network at source.</u> <u>1. The diversion and discharge of stormwater runoff must avoid:</u></p> <p><u>a. Producing conspicuous oil or grease films, scums or foams, or floatable or suspended materials</u></p> <p><u>b. Causing any conspicuous change in the colour or visual clarity</u></p> <p><u>c. Emitting objectional odour</u></p> <p><u>d. Rendering of fresh water unsuitable for consumption by farm animals or</u></p> <p><u>e. Causing any significant adverse effects on aquatic life</u></p> <p><u>f. Causing any permanent bed scouring or bank erosion at or beyond the point of discharge</u></p> <p><u>g. Causing flooding of any property</u></p> <p><u>h. Containing hazardous substances</u></p>	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Son Nguyen	287.4	Amend	Considers there to be a typo	<p>Amend as follows:</p> <p>...</p> <p>The road or state highway is designed to accommodate less more than 5,000 vehicles per day;</p>	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table	Son Nguyen	287.5	Amend	<p>Considers alteration to title of rule to be more specific to development within overland flow paths.</p> <p>Opposes the permitted activity status, instead the activity status should be altered to "Restricted Discretionary"</p>	<p>Amend the title of the rule to read: <u>Buildings, structures, and earthworks on sites with within overland flow paths.</u></p> <p>Amend the activity status from permitted to restricted discretionary</p>	Open Submission
SW - Stormwater /Assessment criteria /General	Son Nguyen	287.6	Amend	Considers the need to add additional assessment criteria	<p>Add</p> <p><u>SW-AC3: Overland Flow Paths</u></p> <p><u>For any earthworks, buildings or structures including retaining walls located within an overland flow path:</u></p> <p><u>1. the effects of flooding on the activity proposed, including whether it is a more or less vulnerable activity;</u> <u>2. the effects on the location of habitable rooms;</u> <u>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</u> <u>4. the effects on people during a flood event and the ability to avoid, remedy or mitigate these.</u> <u>5. the obstruction of flows; and</u> <u>6. any change to location and capacity; and</u> <u>7. any changes in depth and velocity of flow; and</u> <u>8. any change to overland flow on other properties.</u> <u>9. the provision of alternative overland flow paths;</u> <u>10. the extent of any associated earthworks and</u> <u>11. the extent to which methods for long term maintenance of areas affected by flooding, such as easements, are provided</u></p>	Open Submission

SW - Stormwater

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /SW - Stormwater - Rules Table	Son Nguyen	287.7	Amend	Consider providing an exemption for hydraulic mitigation for small increase in impervious area that complies with the maximum impervious area standards.	Amend rule to include permitted standard: SW-R5A Activity Status: Permitted Where: 1. The maximum impervious area standard for the relevant zone or precinct is met, and 2. <u>Development of new or redevelopment of existing impervious areas are less than 50m2</u> 3. Development of new or redevelopment of existing impervious areas meets standard SW-S1	Open Submission
SW - Stormwater /SW - Stormwater - Standards Table	Son Nguyen	287.8	Amend	Consider amending standard to only apply to new or redevelopment of existing impervious areas that are more than 50m2	Amend standard as follows: <u>For development of new or redevelopment of existing impervious areas that are more than 50m2</u>	Open Submission
SW - Stormwater /Objectives /SW-O3: Receiving environment	Dr. Chantal Pagel Natasha Sitarz	289.5	Amend	Supports the recognition in the plan of the adverse effects of stormwater discharges on the receiving environment, and in particular Te Whanga (the Ahuriri estuary), together with the recognition that improving stormwater quality, including to meet the requirements of the NPS-FM 2020 and Te Mana o te Wai, "... can be most easily required as part of the development process". Supports SW-O3 but submits that stronger policies need to be included to achieve this objective, together with rules and standards to put these policies into effect.	Seeks a policy for stormwater treatment, utilising the concept of Green Infrastructure. Considers the criteria for permitted activities rely heavily on "approved stormwater management devices", and seeks more detail to be provided in the plan to ensure that the criteria for approving such devices are consistent with SW-O3. Seeks that the activity status for SW-R1 to SW-R5 should be restricted discretionary where these activities are likely to result in increased stormwater discharges, and the matters of discretion should include low-impact design techniques and green infrastructure. Seeks that the Rules Table in the Stormwater chapter should state that it is subject to any rules in the Ecosystems and Indigenous Biodiversity chapter that place greater or additional restrictions on activities with adverse effects on receiving environments.	Open Submission
SW - Stormwater /General /General	Dr. Chantal Pagel Natasha Sitarz	289.35	Amend	Considers the overlap between these chapters makes it very confusing to understand which infrastructure activities are addressed and in which chapter(s) they are addressed. The overlap between provisions in these chapters also makes it unclear how effects are managed and to understand implications for how the ECO provisions may or may not apply to these activities.	Seeks clarification of what activities are addressed in which chapters. Include provisions for infrastructure that is not a "network utility", "renewable energy generation", "Stormwater" or "transport". Rename the section heading or change section names to Energy, Infrastructure and Transport.	Open Submission
SW - Stormwater /Objectives /SW-O3: Receiving environment	Dr. Chantal Pagel Natasha Sitarz	289.53	Amend	Considers that the Objective needs to support the protection of the coastal environment from the adverse effects of stormwater run-off, in accordance with the NZCPS. Further, the plan should reflect an intention to consider alternative discharge points. Discharging stormwater into one of the most ecologically important areas in the district is questionable.	Seeks to add to SW-O3 as follows: <u>d. Ensure that all stormwater discharges avoid adverse effects on areas of significant biodiversity in the coastal environment, and avoids significant adverse effects on other areas of biodiversity in the coastal environment.</u> Seeks to add a new objective, or incorporate into O3 the following or similar provision, and policy to support that objective as follows: <u>Investigate alternative discharge points that would reduce adverse effects on the coastal environment, in particular Te Whanga.</u>	Open Submission
SW - Stormwater /Policies /General	Dr. Chantal Pagel Natasha Sitarz	289.54	Amend	Supports the concept of green infrastructure but notes that this concept has not been utilised consistently throughout the plan.	Seeks to include a new policy for stormwater treatment, utilising the concept of green infrastructure, and requiring this to be used in all appropriate situations.	Open Submission
SW - Stormwater /Policies /SW-P1: Onsite detention in existing urban areas with a connection to a public stormwater network	Dr. Chantal Pagel Natasha Sitarz	289.55	Support	Support.	Retain.	Open Submission
SW - Stormwater /Policies /SW-P2: Stormwater management in greenfield growth areas	Dr. Chantal Pagel Natasha Sitarz	289.56	Support	Support	Retain.	Open Submission
SW - Stormwater /Policies /SW-P3: Overland flow paths	Dr. Chantal Pagel Natasha Sitarz	289.57	Support	Support	Retain	Open Submission
SW - Stormwater /Policies /SW-P4: Low impact design	Dr. Chantal Pagel Natasha Sitarz	289.58	Support	Support	Retain	Open Submission
SW - Stormwater /Policies /SW-P5: Roofs, car parks, and roads	Dr. Chantal Pagel Natasha Sitarz	289.59	Support	Support	Retain	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table /General	Dr. Chantal Pagel Natasha Sitarz	289.60	Amend	Considers that the criteria for permitted activities rely heavily on "approved stormwater management devices".	Seeks to provide a definition of "approved stormwater management devices", to ensure that the criteria for approving such devices are consistent with SW-O3	Open Submission
SW - Stormwater /General /General	Dr. Chantal Pagel Natasha Sitarz	289.61	Oppose	Opposes the whole chapter, including Introduction, Objectives, Policies and Rules. Arising from late notification of ECO-chapter	Seeks to add: <u>"The Ecosystems and Indigenous Biodiversity chapter includes provisions which relate to stormwater. Where there is a conflict between the Stormwater chapter and the Ecosystems and Indigenous Biodiversity chapter, the provisions that place greater or additional restrictions on activities with adverse effects on the natural environment will apply".</u>	Open Submission

SW - Stormwater

Section / Sub-section / Provision	Submitter Name	Submission number / Point Number	Position	Summary of Submission	Relief Summary	Link to Submission (click to open)
SW - Stormwater /General /General	Dr. Chantal Pagel Natasha Sitarz	289.62	Amend	Considers that the Coastal Environment chapter should also include provisions relating to stormwater, for example to avoid adverse effects on indigenous ecosystems and habitats, biodiversity and threatened or at-risk species.	Seeks to add: <u>"The Coastal Environment chapter includes provisions which relate to stormwater. Where there is a conflict between the Stormwater chapter and the Coastal Environment chapter, the provisions that place greater or additional restrictions on activities with adverse effects on the natural environment will apply"</u> . Seeks to ensure that the CE chapter makes clear that its provisions apply to all activities effecting the CE.	Open Submission
SW - Stormwater /SW - Stormwater - Rules Table /General	Dr. Chantal Pagel Natasha Sitarz	289.63	Oppose	Considers that the class of permitted activities in the Stormwater chapter is too wide. Further, the PA standards do not appear to require that there is no increase in SW discharge. This permissive approach is contrary to the SW Issues, Objectives and Policies.	Seeks to amend the rules for Stormwater as follows: Alter activity status for SW-R1 to SW-R5 to restricted discretionary where these activities are likely to result in increased stormwater discharges, with matters of discretion to include low-impact design techniques, green infrastructure, and improved outcomes for indigenous biodiversity.	Open Submission