

## Heights Road Private Plan Change Request - Stormwater Opinion

<b>Date:</b>	6 November 2024	Carlaw Park
<b>Project name:</b>	Heights Road Private Plan Change	12-16 Nicholls Lane, Parnell
<b>Project no:</b>	IZ072701.106	Auckland 1010
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## Introduction

The purpose of this memo is to assist Council in identifying whether sufficient information has been provided with respect to stormwater matters associated with this plan change and providing assistance to Council around how to process the plan change, and whether to proceed to notification.

The Proposed Plan Change (PPC) is at 9, 33 and 49 Heights Road, Pukekohe. The PPC seeks to rezone 5.35ha of land from Future Urban Zone to Business – Light Industry Zone and apply the SMAF-1 control over the PPC area. A portion of the PPC area is currently vacant greenfield land and the remainder of the PPC area has business activities, which includes the Tractor Centre and BMC Engineering.

## Background

The applicant undertook early consultation with Healthy Waters around the stormwater management approach to support this PPC. In summary, Healthy Waters had advised the applicant that their Stormwater Management Plan (SMP) cannot be authorised under Auckland Council's Regionwide Network Discharge Consent (NDC) for the following reasons:

- The plan change proposes private drainage infrastructure, and
- Runoff from the plan change extent will discharge to a NZTA culvert under State Highway 22, therefore is not part of the Healthy Waters stormwater network.

A private discharge consent will need to be sought at resource consent stage, however the purpose of the SMP that has been prepared to support this PPC is as follows:

- Provide high level guidance around how stormwater can be managed for the PPC area, which considers existing impervious areas to be retained and future impervious areas.
- Demonstrate how the stormwater management approach meets the requirements set out in Chapters E1, E8, E9, E10 and E36 of the Auckland Unitary Plan.
- Identify flood risk areas and demonstrate that the PPC can be rezoned without creating or exacerbating adverse flooding effects at properties upstream or downstream of the development.

An Indicative Masterplan has been prepared by the Applicant to support this PPC to show a hypothetical development scenario as enabled by the Business – Light Industry Zone and to show how stormwater can be appropriately managed if the zoning of the PPC area changes from Future Urban Zone to Business – Light Industry Zone.

## Information Reviewed

With respect to stormwater management, the following information has been reviewed:

- Stormwater Management Plan titled: *Heights Road Plan Change - 9, 33 & 39 Heights Road for G Bar Properties – Final Clause 23 Revision*, dated 28/10/2024, Version 6, referenced P18-088 and prepared by Woods.

## Review of Adequacy of Information Presented in Updated Application

The following matters are considered to be fundamental gaps in information. Further information under Cl23 of Schedule 1 of the RMA is therefore still needed in order for Healthy Waters to understand the stormwater related effects of the PPC and assess the adequacy of the proposed mitigation measures:

- There is no information/assessment of the existing condition and needs (if any) of the immediate receiving environment (Whangapouri Creek). This information is needed to investigate whether there are known concerns which should guide the stormwater management approach on the site, in particular whether it is necessary to enforce the higher level of water quality requirements or whether the existing measures for water quality treatment are sufficient.
- Overland flowpath cross-sections have been taken at a location which receives half the flow as the critical point. This means that the depth of flooding could be deeper than what is shown and while the entry and exit points of the overland flows are not being altered, it does bifurcate the flows immediately within the site which may be challenging to implement, and, if not achievable, would further deepen the flooding on the roads.
- The flood modelling which demonstrates effects of the development potentially has less runoff from upstream in the post-development case, compared to pre-development, which would result in a more optimistic outcome (i.e., flooding effects could be worse than what is currently presented).
- There are also some minor points of clarification that need to be sought or confirmed to ensure understanding of how the stormwater management approach can be implemented and whether this is feasible. This includes:
  - Confirming what is happening to the existing raingarden serving the trafficable areas for the BMC Engineering building as this is not shown in the Indicative Masterplan
  - Seeking clarification around the text in Section 7.2.2 of the SMP and the flow chart in Figure 14 as this is somewhat misaligned, so it is unclear how water quality and retention and detention will be provided.

## Views on Approving, Adopting or Rejecting the Plan Change

Given the further information request needed under Cl23 of Schedule 1 of the RMA as noted above, Healthy Waters is not in a position currently to make a recommendation around whether the plan change should be approved, adopted or rejected.