

Invitation for Comment on Northbrook Wanaka Retirement Village

Northbrook Wanaka Retirement Village is a Referred Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application name	Northbrook Wanaka Retirement Village
EPA reference	FTC000019
Applicant/s	Winton Property Limited
Comments due by	23 June 2021
Accessing the application	https://www.epa.govt.nz/fast-track-consenting/referred-projects/northbrook-retirement-village-wanaka/the-application/

An application has been made by Winton Property Limited (the applicant) under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the act) for resource consents for construction and operation of a retirement village.

To comment on the project application, please fill in the details on the attached form and:

- **Email** the form to northbrookwanakafasttrack@epa.govt.nz. Please mark in the subject line: "Comments on Northbrook Wanaka Retirement Village Fast Track Application (Your name/organisation) by **23 June 2021**"; or
- **Post** the form to Northbrook Wanaka Retirement Village Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the **23 June 2021**; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by **23 June 2021**. Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.

Comments must be received by the EPA, on behalf of the Northbrook Wanaka Retirement Village Expert Consenting Panel, no later than **23 June 2021**

If your comment is not received by the EPA by **23 June 2021** the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application, and choose to include comments from the hapū with any comments you may wish to provide.

Important information

Your personal information will be held by the EPA and used in relation to the project consent application process. You have the right to access and correct personal information held by the EPA.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

All comments received on the application will be available on the EPA website.

If you are a corporate entity making comments on this application, your full contact details will be publicly available. For individuals, your name will be publicly available but your contact details (phone number, address, and email) will not be publicly available.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

Your comment on the Northbrook Wanaka Retirement Village

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Otago Regional Council
*First name	Joanna
*Last name	Gilroy (Manager Consents)
*Email (a valid email address enables us to communicate efficiently with you)	Joanna.Gilroy@orc.govt.nz

2. *We will email you draft conditions of consent for your comment about this application

√	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages

Otago Regional Council (ORC) has the following comments:

1) General comments

The site is located approximately 400 metres from the Clutha River/ Mata-Au which contains a number of values listed in the Regional Plan: Water.

There is no discussion in the AEE on the extent to which the proposal complies with the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005). This is a key consideration of the rule in PC8. Council's Compliance Unit noted concerns with there being no dedicated erosion and sediment control documentation. This is an issue as the soils in this area are glacial till, highly erodible and mobilise very easily during rainfall events. Given the proximity to the Clutha River/ Mata-Au, good mitigation

measures to control stormwater mobilising any sediment should be required. During summer dust may become an issue. The applicant may require water tankers or something similar to control dust from the site.

The transport plan provided noted some planned provision for walking/ cycling which appear largely reasonable for the type of development. There is no mention of the Otago/ Southland Regional Land Transport Plans 2015-2021 (updated 2018) therefore there is no assessment against these policies.

There is no discussion in the application material about pest control or discussion around the relevance of the Regional Pest Plan. Rabbits in particular are a known pest issue in this area and the development will have responsibility for giving effect to the requirements of the Pest Plan. It is noted that rabbits could be a hazard for retirees if they are let in to dig holes in grassed areas for example.

2) Possible Additional Consents Required

The applicant has not discussed whether stormwater permitted activity rules will be complied with. These are outlined in Section 12.B of the Regional Plan: Water.

The site is located over the Wanaka Basin Cardrona Aquifer. Therefore, any drilling over the aquifer would trigger resource consent under rule 14.2.1.1 of the Regional Plan: Water.

Drilling is defined in the Regional Plan: Water as:

The process of creating a hole in the ground with a drill to a depth greater than 1 metre. This does not include hole creation for the purpose of:

- *The construction of a bore;*
- *The erection of fences or overhead utilities; or*
- *The placement of building foundations.*

In the draft EMP the applicant has noted procedures in place if contaminated soil is identified. If contaminated soil is identified, resource consent would be required under rule 5.6.1 of the Regional Plan: Waste. This rule states:

5.6.1 Hazardous wastes at contaminated sites

1. The disturbance of land; or
 2. The discharge of hazardous waste into water; or
 3. The discharge of hazardous waste onto or into land in circumstances that may result in that hazardous waste (or any other hazardous waste emanating as a result of natural processes from that hazardous waste) entering water; or
 4. The deposit of any hazardous waste, in, on or under land; or
 5. The discharge of hazardous waste into air at or from a contaminated site;
- is a discretionary activity.

Under the RPWaste a contaminated site is defined as:

*“For the purpose of this Plan, a contaminated site is a site at which hazardous substances occur at concentrations above background levels **and** where assessment indicates it poses, or is likely to pose an immediate or long term hazard to human health or the environment”.*

A site is classed as a contaminated site under the RPWaste if substance levels exceed relevant soil guidelines values **and** they are not naturally occurring. It is advised that resource consent is obtained on a precautionary basis if there is any suspicion that the site may be contaminated and if it is known that the site is contaminated, then consent must be required from ORC prior to any site disturbance.

3) Comments on consent conditions

It is recommended that you consider including the following conditions:

All earthworks for residential development must be carried out in accordance with the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005).

Prior to the commencement of earthwork activity on the subject site, an Erosion and Sediment Control Plan (ESCP) must be prepared and submitted to the Consent Authority for acceptance. The ESCP must contain sufficient detail to address the following matters:

- a) Specific erosion and sediment control works (locations, dimensions, capacity etc);
- b) Supporting calculations and design drawings;
- c) Catchment boundaries and contour information;
- d) Details of construction methods;
- e) Timing and duration of construction and operation of control works;
- f) Details relating to the management of exposed areas; and
- g) Monitoring and maintenance requirements.

Works must not commence until the Consent Authority has provided their acceptance of the ESCP in writing.

The operational effectiveness and efficiency of all erosion and sediment control measures specifically required by condition XX or by the XX Erosion and Sediment Control Plan must be maintained throughout the duration / each stage of earthworks activity, or until the site is permanently stabilised against erosion. A record of any maintenance work must be kept and be supplied to the Consent Authority on request.

The Consent Holder must undertake and document weekly and Pre and Post-Rain Event site inspections. A Rain Event is defined as any precipitation event that generates overland flow. Records of these inspections must be submitted along with the Monthly Environmental Report required by Condition X.

The Consent Holder must engage a Suitably Qualified and Experienced Person to monitor the site monthly to;

- a) Ensure that the site is complying with its EMP and ESCP; and
- b) Identify any new environmental risks arising that could cause an environmental effect and suggest alternative solutions that will result in more effective and efficient management.

The outcome of these inspections must be included in the Monthly Environmental Report referred to in Condition X.

During the exercise of this consent, the Consent Holder must complete and submit reporting to the Consent Authority in the form of a Monthly Environmental Report. The Monthly Environmental Report must be submitted within 5 working days of the end of each month. The Monthly Environmental Report must include reporting and statements actively addressing but not limited to the following that occurred during the reporting month:

- a) Updates to the EMP and the ESCP;
- b) Weekly Site Inspections – number of inspections completed, and summary of corrective actions undertaken;

c) Reporting on monitoring undertaken (including Pre- and Post-Rainfall Events as required by condition X and water quality sampling required by condition X) and whether non-conforming results were obtained;

Inclusion of an Archaeological Discovery Protocol

4) Policy considerations

The policy assessment provided has not discussed matters such as the National Policy Statement for Freshwater Management (NPS-FM), relevant Iwi Management Plans etc.

Thank you for your comments

From: [REDACTED]
To: northbrookwanakafasttrack
Subject: Northbrook Wanaka Retirement Village Consent Application - ORC Comments on Draft Conditions
Date: Friday, 16 July 2021 2:09:35 pm
Attachments: [image001.png](#)
[image004.png](#)
[Written comments from ORC to Consenting Panel for Northbrook Wanaka Retirement Village June 2021.docx](#)

Good Afternoon,

Thank you for your invitation to comment on the Northbrook Wanaka Retirement Village Expert Consenting Panel's draft conditions for the Northbrook Wanaka Retirement Village Consent Application.

The Otago Regional Council (ORC) has the following comments on these draft conditions:

- It is unclear whether the reporting requirements including providing plans for review and acceptance are expected to be sent to ORC as well. This is something ORC would want to be provided with.
- A number of proposed conditions were recommended in the feedback provided by ORC in June 2021 (see attached). Many of these have not been incorporated and it is still our recommendation that these are strongly considered, particularly the inclusion of a Monthly Environment Report.
- There are no requirements to monitor surface water quality as a result of the works. Given the proximity to the Clutha River/ Mata-Au this should be considered.
- ORC would suggest incorporating the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005) into the Consent Document. As mentioned in our previous comments the soils in this area are glacial till, highly erodible and mobilise very easily during rainfall events.

Kind Regards,



Leah Day

CONSENTS OFFICER – PUBLIC ENQUIRIES

[REDACTED]
leah.day@orc.govt.nz

www.orc.govt.nz

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This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you.

From: northbrookwanakafasttrack [mailto:northbrookwanakafasttrack@epa.govt.nz]

Sent: Thursday, 15 July 2021 7:58 a.m.

To: northbrookwanakafasttrack <northbrookwanakafasttrack@epa.govt.nz>

Subject: Northbrook Wanaka Retirement Village Consent Application - Process Update - Invitation to Comment on Draft Conditions

Importance: High

Tēnā koe

You are receiving this email as you provided comment on the Northbrook Wanaka Retirement Village Consent Application under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act).

Information Requests

On 13 July 2021, the Environmental Protection Authority (**EPA**) received a response to an information request from the applicant. Their response can be viewed on the EPA website here:

<https://www.epa.govt.nz/assets/Uploads/Documents/Fast-track-consenting/Northbrook-Wanaka/FTC19-Applicant-response-to-second-information-request.pdf>

Also on 13 July, Queenstown Lakes District Council (QLDC) provided a response to further information requested. This can be viewed here:

https://www.epa.govt.nz/assets/Uploads/Documents/Fast-track-consenting/Northbrook-Wanaka/Reports-and-advice/QLDC_Response-to-further-information-request-re-Northlake-Northbrook-application.pdf

For ease of reference, all information requests issued by the EPA, as well as the responses to those requests can be viewed on the EPA website here:

<https://www.epa.govt.nz/fast-track-consenting/referred-projects/northbrook-retirement-village-wanaka/reports-and-advice/>

Minute of the Panel

On 14 July 2021, the Northbrook Wanaka Retirement Village Expert Consenting Panel (**the Panel**), issued Minute 3 of the Panel. This Minute is **attached** to this email.

This Minute contains discussion around the draft conditions, including some alternate wording to some of the conditions contained in the draft conditions.

Invitation to Comment on Draft Conditions

The Panel now invites you to comment on its draft conditions for the Northbrook Wanaka Retirement Village.

In accordance with clause 36(1)(b) of Schedule 6 of the Act, the Panel must invite comments on its draft conditions from every person or group that commented on the application when invited by the Panel.

The draft conditions are **attached** to this email in pdf form.

Should you require a word version of the draft conditions, these can be provided to you.

The draft conditions should be read in conjunction with Minute 3 of the Panel, as there are a number of matters in the Minute for consideration and comment. The Minute also provides alternate wording to some of the conditions contained in the draft conditions, which the Panel also invites you to comment on.

Please note, this is an invitation to comment on the draft conditions and your comments should be focussed on the draft conditions.

Comments on draft conditions must be received by the EPA no later than **21 July 2021**.

If you have any questions, please contact the Project Leader, Alex Erceg by email at northbrookwanakafasttrack@epa.govt.nz, or by phone on [REDACTED].

Ngā mihi maioha

Alex Erceg ([he/him](#))

Northbrook Wanaka Retirement Village Project Leader

[REDACTED]



[REDACTED] us on [Facebook](#), [Twitter](#), [Instagram](#), and [LinkedIn](#).

Our New Zealand Business Number is 9429041901977.

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