

Comment on the Wooing Tree Estate project

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)		
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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 ORC science team has looked at the storm water management proposal for this application. It noted a concern that the intention to discharge to soakage holes with a capacity between 3.7 and 20 litres per second may have the potential to adversely effect on ground water quality as it will increase the potential for contaminants to be fast-tracked to the water table that would otherwise be immobilised by infiltration through soil. It would be preferable that Low Impact Design stormwater management principles are required to be incorporated within the development to ensure stormwater discharges do not adversely affect groundwater quality.

The ORC compliance team have noted that they would want to see appropriate sediment control and dust mitigation measures in place. For appropriate sediment controls please see the Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region 2016 (Auckland Council Guideline Document GD2016/005). During summer dust may

become an issue. The applicant may require water tankers or something similar to control dust from the site.

2) Possible Consent Requirements

A) Plan Change 8 to the Regional Plan: Water for Otago contains rules which relate to earthworks for residential development. The application states that *the earthworks on this site are relatively limited. This is a large flat site. There is no recontouring required. Earthworks will be those associated with:*

(a) earthworks associated with roading and other infrastructure; and

(b) eventual earthworks associated with foundations for housing (not part of this consent).

The volume of earthworks is minor, particularly in comparison to other comprehensive residential developments.

Standard erosion and sediment control measures are employed.

Earthworks associated with roading and other infrastructure that are for the purpose of a residential activity would be considered earthworks for residential development.

Rule 14.5.1 of Plan Change 8 provides the permitted activity criteria for earthworks for residential development. If rule 14.5.1 cannot be met then resource consent would be required for a restricted discretionary activity under rule 14.5.2.

Plan change 8 can be found here:

https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000045/Applicants-proposal-documents/Omnibus_Plan_Change_Plan_Change_8.pdf

B) The Regional Plan: Air for Otago contains rules which may be relevant during the construction phase of the subdivision, such as dust related to construction activities.

The Regional Plan: Air for Otago can be found here:

<https://www.orc.govt.nz/media/1412/regional-plan-air-for-otago.pdf>

C) The Regional Plan: Water for Otago contains rules which relate to the discharge of stormwater. It is noted in the application that there is no reticulated stormwater network in northern Cromwell and the intention is for inground soakage treatment of stormwater from all roads, buildings and properties. This could potentially meet permitted activity rules; however, ORC would expect good management practice in the treatment of stormwater before discharge, especially given the recent national direction on water quality.

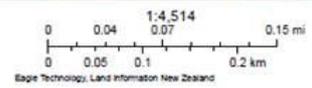
The Regional Plan: Water for Otago can be found here:

https://www.orc.govt.nz/media/8897/regional-plan_water-for-otago-updated-to-16-may-2020.pdf

D) The Regional Plan: Waste for Otago contains rules which apply to the disturbance of land at contaminated sites. It is noted in the application that *The National Environmental Standard on land contamination applies, but this proposal does not require a consent under the NES because the level of contaminants does not trigger relevant consents. This is confirmed by a Detailed Site Investigation (DSI) undertaken by Opus which will be provided as part of the consent application if the Minister refers this project.* However, under the Otago Regional Council HAIL Register (see below) we note that the site is identified as being partially investigated therefore consents will be required for earthworks.



May 26, 2021



The Regional Plan Waste for Otago can be found here:

<https://www.orc.govt.nz/media/1516/regional-plan-waste-for-otago.pdf>

3) Conditions of Consent

If consents are required for the activities discussed above, Council has a range of standard conditions that are typically applied; a copy of which are available upon request.