

Robyn Burns

From: Philip McKay <Philip.McKay@mitchelldaysh.co.nz>
Sent: Friday, 8 October 2021 11:59 am
To: Jason Kaye
Cc: Robyn Burns
Subject: RE: RM210103 Springhill Subdivision - Other Matters
Attachments: RAP Review- Springhill Farm Development.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jason, receipt acknowledged.

My apologies for not attaching the Stantec peer review of the Draft Remediation Action Plan. Please find this attached.

Regards

Phil

 **Philip McKay**
Associate

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From: Jason Kaye <jason.kaye@developmentnous.nz>
Sent: Thursday, 7 October 2021 11:20 PM
To: Philip McKay <Philip.McKay@mitchelldaysh.co.nz>
Subject: RM210103 Springhill Subdivision - Other Matters

Dear Philip,

In addition to your request to commission a report, your letter of 16 September sought further clarification of several matters. Response to these points is provided in this email.

Demand on Aquifer

We have considered the suggested imposition of a consent notice preventing houses from forming water supply bores, but have difficulty accepting that the potential effects of domestic extraction for the proposed lots justifies such a restriction in the context of the rural aquifer demands of the surrounding area.

Domestic supply based on 312 six person homes at 200 litres per person results in a total domestic water demand of 136,656m³ per year. Alternatively, the Regional Resource Management Plan provides a permitted activity allowance for a domestic bore to draw 15m³ per week for "reasonable domestic needs". If all 312 homes were served by a bore drawing the maximum permitted volume for reasonable domestic needs, this would total 243,360m³ per year.

Based on our development experience across Hawke's Bay, we expect the water supply for the majority of homes on the lots to be served by roof fed tank storage. This is reinforced by the offered requirement for all homes to be

accompanied by a water tank. For the sake of a highly conservative assessment scenario, if half of the homes were served by water bores, this would result in a permitted extraction volume of 121,680m³ per year.

Across the surrounding area are a multitude of approved consents for ground water extraction related to rural production. A quick (and non-comprehensive) scan of the consents in proximity of the application site identified a dozen consents (attached) authorising a total groundwater extraction exceeding 12 million cubic metres per year. If 50% of the lots were served by water bores, this would represent around 1% of the permitted water extraction of 12 consents from the surrounding area.

The consented extractions have been accepted and approved by HBRC. An additional 1% water extraction would not appear to be of such significance to justify the imposition of bore restrictions on the proposed lots.

We also note Condition c of Rule 53 of the Regional Resource Management Plan, which requires that a permitted activity status water bore “shall not adversely affect any lawfully established efficient groundwater take, or any lawfully established surface water take, which existed prior to commencement of the take unless written approval is obtained from the affected person”. This limitation serves as a fall back in terms of effects on other aquifer users, preventing new bores being formed in circumstances where they will adversely affect existing bores. This condition alone would appear to obviate the need for the imposition of any bore restrictions.

On the basis of the insignificance of the volume of potential groundwater extraction of the development against the existing consented (and permitted activity status) groundwater extraction, and the fall back restriction of Condition c of Rule 53 of the Regional Resource Management Plan, we do not propose the imposition of a consent notice restriction preventing groundwater extraction.

Firefighting Water Supply

Attached are pdf copies of correspondence sent to Bob Palmer, FENZ Fire Risk Management Officer, explaining the development and seeking direction on requirements.

Mr Palmer advises that FENZ are somewhat watering down the requirements of 4509:2008 due to compliance difficulties, and will accept shared 30m³ tanks with a 100mm coupling, provided that all homes are within 90m of a shared storage tank.

We have applied this approach in other subdivisions, positioning communal storage tanks adjacent to the road boundary of lots and covered by easements for access and use.

The proposed large lot sizes and absence of restriction on building platform location of this development is such that very few lots could practicably share a road side firefighting water supply located within 90m of houses on adjoining lots. Such a supply arrangement would inevitably require location of buildings to be fixed prior to 224 certification and shared water storage tanks located on side boundaries with requirement for access formation.

As shared firefighting water storage is not an effective solution for the large lots of the development, we will continue with the firmer requirement for 4509:2008 compliance.

Mr Palmer has not stated the requirement for any further firefighting infrastructure to be provided within the development.

Street Lighting

As previously set out, we welcome a condition requiring the provision of street lighting to road intersections within the development. We have considered this matter and our position is based on the balance between road safety and the creation of a suburban glow within a rural setting.

If additional lighting is proposed, we would require further justification of this from Council’s engineering consultant.

We note that the statement of “... concern for safety and security of the subdivision as well as the transportation network” was provided in the original advice from Council’s engineering consultant. This seems to raise matters beyond traffic safety. Clarification of these additional concerns will also be of assistance.

Additionally, we note on further review of the roading comments from Council’s engineering consultant that reference is made to compliance with the “Hastings District Council Code of Practice for Subdivisions”. You will no doubt agree that this is an inappropriate reference for a resource consent with Central Hawke’s Bay District Council and that the HDC ECoP should not be referenced in consent conditions as a design standard.

Foot Path Removal

I can confirm that the development does not propose the inclusion of lime sand footpaths, consistent with the amended plan submitted 09 September 2021.

Draft Remediation Action Plan

Thank you for your confirmation of draft SRAP acceptability. Unfortunately the Stantec technical review, providing guidance of final SRAP requirements, was not attached as intended to your letter. We would welcome this being forwarded when you have an opportunity to do so.

Kind regards

Jason Kaye
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