

**Before the Western Bay of Plenty District Council's Hearing Panel**

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of Plan Change 93 to the Bay of Plenty District  
Plan (Te Puna Springs Estate Limited)

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**WRITTEN RIGHT OF REPLY  
FOR TE PUNA SPRINGS ESTATE LIMITED  
(IN RESPONSE TO  
BAY OF PLENTY REGIONAL COUNCIL SUBMISSION ONLY)  
7 JULY 2022**

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- 1.1 This Right of Reply is meant to be supplementary to the verbal right of reply given yesterday, and specifically responds to the submission and evidence filed by the Bay of Plenty Regional Council(BOPRC). Mr. Pairi tabled a three-page document of objectives, policies, and rules on behalf of the Regional Council during the afternoon of the Council Plan Change hearing on 6th July 2022.
- 1.2 I note these were provisions not provided with the briefs of evidence filed by the Regional Council which were the subject of timetabling directions from the Panel, nor are the matters covered in response to new matters arising during the hearing or through rebuttal evidence. To suggest that the lateness of providing them was due to the rebuttal evidence of the Applicant being filed the day before the hearing, is simply not factual. The suggested provisions cover matters that were in the BOPRC original submission and contain the very level of detail sought by the Council planner and Mr. Collier from the BOPRC prior to meeting with them several weeks before the hearing. This is not the level of professionalism or collaboration expected of a well-resourced Regional Council such as this one.

#### **RESPONSE TO BOPRC PLAN PROVISIONS**

- 1.3 The Panel provided the Applicant and Council staff an adjournment to advise our response to BOPRC submission and to provide our response to these suggested provisions:
- 1.4 Essentially the BOPRC witnesses have failed to limit their evidence to the plan change as proposed, and delved into matters that extend beyond the Section 32 and 32 AA evaluations, now seek additional relief to that sought in the submission, and extend their relief sought into matters that are squarely intended to sit within the discretion of the District Council as set out in the RPS, and seek to address i policy changes that are at odds with the rest of the District plan.
- 1.5 Neither a regional council nor a territorial authority has the power to make rules for purposes of falling within the functions of the other or for the purposes of carrying out its own functions. Regarding natural hazards there may be overlapping of powers, and overlapping of plans, but inconsistencies between controls are precluded by Section 75.
- 1.6 There are also clear expectations of integration and coordination by the Regional Council to the District Council regarding natural hazard policies and allocation of responsibilities set out in the RPS to avoid duplication and unnecessary inefficiencies and costs.
- 1.7 If one local authority is not happy with the objectives and policies and rules within another Councils plan, they can seek a plan change to that plan. This relief sought by the Regional Council is the proverbial “tail wagging the dog”.

- 1.8 None of the changes sought by BOPRC to the Te Puna Springs Area, nor the issues raised by BOPRC, are unique or specific to this 3-hectare piece of new developable land that will be enabled for new commercial zone forms of development in the district plan.
- 1.9 The Regional Council appear to be attempting inappropriately through a small private plan change, to attack and undermine the effectiveness of the operative WBOPDC District Plan and seek broad sweeping policy and plan provision changes to the operative plan approach that applies consistently across its District. Further BOPRC witnesses seeks to do so seemingly without experience in BOPRC own consenting team when dealing with Stormwater discharge consents and how those are processed, and without first dealing with its own 2018 stormwater guidelines that have not been updated since NPSFW 2020 has been enacted (currently under review).
- 1.10 The issues raised by the Regional Council submission sought the Structure Plan be amended to providing further detail as to the new developable areas enabled by rezoning to show the land has capacity to manage stormwater and flooding and avoidance of loss or damage to natural stream or wetland areas with an ecological assessment. This appears to have been addressed through the ecological assessment by Wildlands, evidence and rebuttal evidence, new plan provisions suggested, and the updated structure Plan.
- 1.11 The Regional Council planner Mr. Te Pairi advised at the hearing that despite this, the Regional Council continues to oppose the Plan change and seeks further changes that include:
- a) Suggested new objectives and policies specifically for this area are required to be included in the District Plan.
  - b) a natural hazard risk assessment be required.
  - c) specific series of additional objectives, policies and rule provisions in the District Plan for a “stormwater management plan” process New Proposed Water Quality Provisions.
- 1.12 The Regional Council have sought further objective, policies, and rules in relation to water quality. The Regional Council’s original submission and further submission do not mention or seek the inclusion of further objectives or policies. There has not been a Section 32 analysis provided to justify the necessity or efficiency of these provisions nor has any cost or benefit analysis been provided. When incorporating new plan objectives into a plan for a discreet area, it is important that Section 32 Analysis be undertaken to determine any such need for further objectives or policies into an operative plan, and whether these bests achieve the purposes of the RMA.
- 1.13 The further objectives and policies that the Regional Council seek are as follows:

## 1. New Objective – Water Quality

*Water quality is managed within the Te Puna Springs Structure Plan to avoid loss of values to the Oturu Creek.*

## 2. New Policy – Water Quality

*Stormwater effects are mitigated by ensuring any new buildings are constructed with inert roofing materials or require treatment via water quality treatment devices to be designed in accordance with BOPRC Stormwater Management Guidelines (Guideline document 2012/01, updated as of December 2015).*

- 1.14 Water quality itself is not a direct function or responsibility of the District Council under Section 15 of the RMA (this function and duty sits with the Bay of Plenty Regional Council). The Regional Natural Resources Plan notes on page 5 that the authorisations of discharges from stormwater systems to water (as defined in the Definition of Terms in the plan) are a Regional Council function under s15 and s30 of the Act unless the function is of transferred to a city or District Council.
- 1.15 The District Plan already contains District wide objectives and policies in relation to both the loss of ecological values (as sought through the suggested new objective) and mitigation of stormwater quality effects (as sought through the suggests new policy). These are as follows:

### Chapter 5 of the District Plan

**Objective 5.2.1.4** – Preservation of wetland and riparian areas and where practicable the enhancement or restoration of the values and function of degraded wetland and riparian areas.

### Chapter 12 of the District Plan

**Policy 12.2.2.7** – Subdivision and development practices that take existing topography, drainage, and soil conditions into consideration with the aim of minimising the effects of stormwater run-off.

- 1.16 The further new objective is proposed by the Regional Council in relation to stormwater management – Te Puna Springs Structure Plan as follows:

*Cumulative stormwater effects arising from increased volume and peak flows and water quality effects are managed in an integrated manner solely within the Te Puna Springs Structure Plan without the need to rely on upstream or downstream detention options.*

The District Plan already contains the following stormwater objectives in Chapter 12:

**Objective 12.2.1.6** - *Subdivision and development that minimises the effects from stormwater run-off; and*

**Objective 12.2.1.4** - *Sufficient infrastructure capacity is provided to ensure the efficient and equitable provision of services to all land in the catchment.*

The further objective provides no real value or purpose, with the existing Plan objectives and policies are adequate and sufficient.

- 1.17 The Regional Council has also proposed a new policy in relation to a Stormwater Management Plan as follows:

*Manage the cumulative stormwater quality and quantity effects within the Te Puna Springs Structure Plan and on the downstream environment through a Stormwater Management Plan (SMP) for the entire Structure Plan area. The SMP is to be certified by Western Bay of Plenty District Council prior to the applicant obtaining a discharge permit, and prior to any subdivision. Certification is to confirm that the SMP includes:*

The provision appears incomplete after the word “includes” and provides no further detail.

The reason given for this new policy by the Regional Council is that they consider that it will manage any cumulative flood risk arising from the plan change to the wider catchment, in an integrated manner at Structure Plan stage. As stated by Mr. Collier and Mr. Raynor, in their opinion is addressed through the Regional Council's discharge consent process in a robust manner.

- 1.18 The further provisions provided by the Regional Council are somewhat confusing because they introduce a series of provisions relating to a requirement for a Stormwater Management Plan process, the role and purpose of which is unclear.
- 1.19 The Regional Council have also sought new objectives and policy that requires the preparation of a comprehensive SMP -Stormwater Management Plan- to manage stormwater quality and quantity, before and prior to obtaining a discharge consent, and before subdivision occurs. It is unclear what this plan is to contain nor has any economic efficiency or cost vs benefit analysis been provided to support this suggested approach. Whilst this may have been proposed by Rotorua District Council as part of its the 74-hectare Pukehangi Heights Plan Change Mr. Te Pairi has referenced, this was a public plan change fast tracked process for approximately 1200 houses, the land area was approximately 25 times the size, with multiple land owners, part of a wider catchment that has known high- risk downstream natural hazard risks, significant cultural issues raised by TALT, Iwi and Hapu submitters, the wider catchment had a lapsed consent that is in process of being renewed and significant infrastructure assets to vest in the Rotorua District Council.
- 1.20 The primary purpose of the SMP in that situation was to coordinate and provide certainty for stormwater management when future development or consents were

going to be from multiple landowners. Even one of these factual circumstances would be enough to differentiate the appropriateness of its application to this site private plan change, but none of those facts apply here to justify a SMP rule in the District Plan for this site alone.

- 1.21 The introduction of a Stormwater Management Plan process is unnecessary and replicates an existing and robust Regional Council stormwater discharge consent process appropriate for a site of this scale.

### **WEIGHTING OF EXPERT WITNESSES EVIDENCE**

- 1.22 Some of the Regional Council's witnesses who presented yesterday did not seem to have experience with the Bay of Plenty Regional Council consents team and their discharge consent application processes.
- 1.23 Mr. Te Pairi appears from his statement of evidence to have limited experience as a Consents Planner, outside of the urban developments referenced to when he worked in London. His statement of evidence states he does not hold full NZPI membership, and his planning qualification is not stated.
- 1.24 Mr. Raynor and Mr. Collier in contrast have approximately 50 years of combined consenting experience in both large and small sites in the region in addition to considerable plan change experience. Mr. Collier is a full member of the NZPI. His experience extends to not only preparing applications for discharge consents, but also the processing of regional consents. In my submission, Mr. Collier's planning evidence should be preferred and given greater weight by the Panel, based on relevant qualifications and experience.
- 1.25 Te Puna Springs experts do not agree with Ms. Ira's comments on BOPRC consent processes that they have experienced over many years and reject the inference that they may not be sufficient to manage all effects, including cumulative effects). One can only surmise this may been her personal experience in Urban Auckland where Ms. Ira has considerable experience (in terms of how discharge consents are managed under the Unitary Plan). But this is not the case in the Bay of Plenty with the regional council's consents team and current NPS's, Natural Resources Regional plan, RPS and RMA Part 2 (most SW and earthworks consents for greenfield developments, especially near waterways, are either discretionary or non-complying). There are extensive and comprehensive set of objectives, policies, and rules which such consents are measured and assessed against.
- 1.26 Regional Council's consent staff require extensive stormwater modelling and analysis to be undertaken based on a complete and detailed design for each development. Conditions of consent can often require further modelling to incorporate all matters including footpaths, hardstand areas, patios, all pipework, as a belt and braces approach at the time of earthworks. According to Mr. Collier and Mr. Raynor, the modelling process itself can take between 6 and 18 months.

- 1.27 Mr. Raynor and Mr. Collier both reject any suggestion that the regional discharge consent process may in some way be inadequate as a process in determining stormwater and flooding effects. To suggest that the Regional Council consents team do not consider cumulative effects through full discretionary activity process and wide-ranging discretion including Part 2 matters as Ms. Ira did is incorrect.
- 1.28 To the contrary, regional consent applications regarding stormwater are extensive, thorough, robust and in most instances a highly challenging, time consuming and (increasingly) costly process that already involves unnecessary duplication. The Regional Council consents team implement the outcomes of regional guidelines District Council plans, Natural Resources Regional Plan, National Policy Statements, and National Environmental Standards.
- 1.29 A further point which is important to note for the Commissioner's is that regional consent processes completely ignore District Plan rules, structure plans and District Council requirements. These are rarely seen to be relevant, if at all.
- 1.30 A stormwater management plan contents and assessment may be overridden by regional consent processes and regional plan objectives, policies, and rules, particularly if done later or if the design detail of what is planned for the site changes which is often the case with commercial sites as site plans are strongly dependent on secured tenants on the sites that have specific building requirements.
- 1.31 The stormwater management plan process will simply add to further costs, delays and create an unnecessary process for a small site that will be held in single ownership at the time a regional discharge consent is sought which is required prior to any new development on site occurring.
- 1.32 The Regional council has also sought inclusion of the following provisions:
- (v) Consideration of the intended scale, nature, and form (including ground levels) of the commercial area and the interaction of the identified flood extents and proposed stormwater mitigation measures.
- (vi) *Specific information requirements for the design details of the stormwater measures. Details shall include:*
- a. *The size of detention, location, configuration of the outlet structures, discharge locations, and hydraulic performance of the on-site stormwater management devices; and*
- b. *The size of channels and the related erosion protection measures for primary, secondary, and overland flow paths (on-site and off-site) including for the receiving waterways immediately downstream.*
- c. *Design and sizing information to manage water quality treatment wetlands and associated devices in accordance with BOPRC Stormwater Management Guidelines (Guideline Document 2012/01, or any subsequent replacement guideline for at-source controls, and water recycling options in areas zoned Commercial in parallel to the preparation of the discharge consent.*

*All stormwater mitigation devices shall be designed, constructed, and operated in accordance with the BoPRC stormwater management guidelines (Guideline Document 2012/01; updated at as December 2015) and, shall be implemented as approved in the Stormwater Management Plan.*

- 1.33 These are a mix of provisions that simply replicate the requirements for regional consents, detailed design requirements already in the district plan, and/or read like resource consent conditions. They are completely inappropriate in the context of this plan change.
- 1.34 If the plan change is granted, the applicant's intention is to proceed straight away with detailed design for this site, buildings and the discharge and other regional consent matters as a single site in one ownership.
- 1.35 As indicated in the correspondence attached to Mr. Collier's rebuttal evidence, the suggestion of an additional provision to include inert roof materials as suggested in the provisions provided by Mr. Te Pairi, was already offered by the applicant as part of meeting with the Regional Council prior to the hearing.
- 1.36 The Applicant therefore has included (with the Reporting Planners agreement) a similar provision in the final set of stormwater performance standards that will apply for the Te Puna Springs Commercial zone.
- 1.37 Some of these provisions appear to relate to the Regional Council submission point covered in Mr. Te Pairi's evidence seeking a Natural Hazards Assessment.
- 1.38 This matter was covered comprehensively in Mr. Collier's evidence. and in the Section 42A Report for the plan change and is a matter which in my view requires no further consideration. The Natural Hazards Assessment Policy and criteria for when one is required is firmly related to scale and materiality in terms of this policy to apply as a requirement by the Regional Council. The Regional Council can and does have jurisdictions under Policy NH9B for where it can state a NHA must apply at the time of subdivision, change or intensification of land use, such as to greenfield sites of greater than 5 hectares of developable area. Mr. Te Pairi suggested interpretation that the policy apply to this site is legally incorrect. It is also inconsistent with NH13(c)(ii), which clearly sets out allocation of responsibilities for area based natural hazard risk assessments, that it is the districts responsibility to determine risks for this site. This is reinforced by Policy NH9B(b), and as discussed in my opening legal submissions, the threshold tests for exercising discretion, is a power that is meant to sit with the District Council. In these circumstances, it is highly inappropriate that the Regional Council is attempting through submission of opposition to step beyond the allocation of responsibilities as intended in its own RPS.
- 1.39 Here are all three of the Regional Policy Statement definitions related to development of land clearly that the policy requirement does not apply to this plan change land area where the new developable land, less the existing commercial zone land already developed, and the stormwater ponds and wetlands, is 21,720m<sup>2</sup> (northern



greenfield developable area) and 8,575m<sup>2</sup> (southern greenfield developable area), in total 3 hectares of greenfield/new developable land.

**Developable land:** (b) Excludes land that is: (i) Stormwater ponds and detention areas; (ii) Geotechnically constrained (such as land subject to subsidence or inundation); (iii) Set aside to protect significant ecological, cultural, heritage or landscape values; (iv) Set aside for non-local recreation or esplanade reserves or access strips that form part of a larger regional, sub-regional, or district network; (v) Identified or used for non-residential activity including business activities, schools, network utilities, health centres or other district, regional or sub-regional facilities.

**Development of land** means the process of subdividing land and/or changing or intensifying the use of land.

**Development site** means an area on which development of land is undertaken, or proposed to be undertaken, either in one stage or in multiple stages over time that is: (a) a parcel of land held in a separate Certificate of Title; or (b) a parcel of land held in multiple Certificates of Title that are contiguous; or (c) multiple-owned Māori land not necessarily held in a separate Certificate of Title.

(My emphasis added)

## CONCLUSION

- 1.40 The applicant has provided to the Council today a tracked changed version of recommended plan provisions, and updated structure plan, which has responded to submissions and evidence, where those amendments sought have been accepted by the Applicant as part of its plan change.
- 1.41 There is only one of the suggestions put forward by Mr. Te Pairi, that is accepted by the Applicant and recommended to be adopted in principle. This has been subject to minor wording amendment but is now included as a permitted performance standard 8.4 relating to inert roofing materials to avoid contaminants as discussed in evidence of Mr. Ira.
- 1.42 District Plans must provide certainty and must not contain unnecessary or replicated existing plan provisions or processes.
- 1.43 Te Puna Springs oppose the inclusion of any of the other suggested BOPRC provisions based on the legal evaluation tests as set out for First Schedule processes and caselaw, set out in the applicant's legal submissions. Mr. Collier has prepared a table setting out a summary of BOPRC's proposed provisions and response to them, which is attached to these submissions.
- 1.44 The matters related to natural hazard risks on this site squarely sit within the discretion of the District Council to determine as to the management of risks which

the reporting planner and District Council engineers have stated in their opinion are addressed in the proposed PPC 93 provisions.

A handwritten signature in black ink, appearing to read 'Kate Barry -Piceno', with a long horizontal line extending to the right.

**Kate Barry -Piceno**

**Counsel for Te Puna Springs Ltd PPC 93 applicant**

**Dated 7 July 2022**

## Bay Of Plenty Regional Council Proposed Provisions and Applicant response

Provisions	Comments	Accept / Reject
<p><b>Objective - Water quality:</b> Water quality is managed within the Te Puna Springs Structure Plan to avoid loss of values to the Oturu Creek.</p>	<p>This matter is already addressed by plan provisions including: <b>Objective 5.2.1.4</b> – Preservation of wetland and riparian areas and where practicable <u>the enhancement or restoration of the values and function of degraded wetland and riparian areas.</u></p>	Reject
<p><b>Policy - Water quality:</b> Stormwater quality effects are mitigated by ensuring any new Buildings are constructed with inert roofing materials or require treatment via water quality treatment devices to be designed in accordance with BOPRC Stormwater Management Guidelines (Guideline Document 2012/01, updated as at December 2015).</p>	<p>This matter is already addressed by <b>Policy 12.2.2.7</b> – Subdivision and development practices that take existing topography, drainage and soil conditions into consideration with the aim of <u>minimising the effects of stormwater run-off</u></p>	Reject
<p><b>Rule – Inert roof materials:</b> All new Buildings shall be constructed with inert roofing materials or require treatment via water quality treatment devices to be designed in accordance with BOPRC Stormwater Management Guidelines (Guideline Document 2012/01), updated as at December or future equivalent.</p>	<p>This matter is addressed by the further structure plan provision 8.4:</p> <p style="padding-left: 40px;"><b>8.4 Stormwater management</b> <i>At the time of building or subdivision consent (whichever occurs first) stormwater management measures shall be implemented (where appropriate) as follows:</i></p> <ul style="list-style-type: none"> <li><i>i) The use of rain gardens and similar systems for water quality treatment</i></li> <li><i>ii) Stormwater detention tanks in parking and roading areas for stormwater attenuation.</i></li> <li><b>iii) <u>The use of inert roofing</u></b></li> </ul>	Accept in Part.

Provisions	Comments	Accept / Reject
<p><b>Objective: Stormwater Management – Te Puna Springs Structure Plan</b></p> <p>‘Cumulative stormwater effects arising from increased volume and peak flows and water quality effects are managed in an integrated manner solely within the Te Puna Springs Structure Plan without the need to rely on upstream or downstream detention options’.</p>	<p>The District Plan already contains objectives and policies in relation to both the loss of ecological values (as sought through the new objective) and mitigation of stormwater quality effects (as sought through the new policy). These are as follows:</p> <p><b>Objective 5.2.1.4</b> – Preservation of wetland and riparian areas and where practicable the enhancement or restoration of the values and function of degraded wetland and riparian areas.</p>	Reject
<p><b>Policy: Stormwater Management Plan</b></p> <p>Manage the cumulative stormwater quality and quantity effects within the Te Puna Springs Structure Plan and on the downstream environment through a Stormwater Management Plan (SMP) for the entire Structure Plan area. The SMP is to be certified by Western Bay of Plenty District Council prior to the applicant obtaining a discharge permit, and prior to any subdivision. Certification is to confirm that the SMP includes:</p>	As above	Reject
<p>(a) A Natural Hazard Risk Assessment that complies with Regional Policy Statement: Appendix L – Methodology for Risk Assessment which shall demonstrate that a low level of risk will be achieved within the Te Puna Springs Structure Plan without increasing the flooding risk downstream including Armstrong and Borrell Roads;</p>	<p>This matter already sits as a policy under the RPS and has been canvassed in evidence and is at the District Councils discretion under the RPS. It is not appropriate to be included in District Plan</p>	Reject

Provisions	Comments	Accept / Reject
<p>(b) The same range of criteria which must be at least as conservative as those used in the stormwater modelling report titled “Western Bay of Plenty Flood Mapping; Model Build Report: dated February 2021”. Including an assessment of:</p> <ol style="list-style-type: none"> <li>1. potential effects of stormwater (velocity, flood depth, flood extent) as well as related erosion effects on the downstream catchment.</li> <li>2. the potential for effects related to flood duration including: <ol style="list-style-type: none"> <li>a. holding up stormwater discharges to the streams due to elevated and longer duration backwater;</li> <li>b. increased stream bank erosion and channel instabilities from extended periods of elevated flows;</li> <li>c. increased length of time buildings, roads, footpath, and structures might be flooded above the key flood hazard threshold for depth and velocity (DxV &gt;0.3);</li> </ol> </li> </ol>	<p>District Plans should not set stormwater modelling parameters. The matters below will need to be designed and consented through a resource consent process and are not matters to be included in a District Plan</p>	<p>Reject</p>
<p>(iv) Verification that if model platforms other than those used in the report titled “Western Bay of Plenty Flood Mapping; Model Build Report: dated February 2021” are used for the SMP to predict downstream flooding effects, that the alternative model platforms produce results that are consistent with the empirical data for the catchment at the appropriate gauged location to the satisfaction of the Western Bay of Plenty Council;</p>	<p>This matter has been confirmed by Council staff . Will be further reviewed as part of consent process, based on most up to date modelling at the time of the consent.</p>	<p>reject</p>

Provisions	Comments	Accept / Reject
<p>(v) Consideration of the intended scale, nature and form (including ground levels) of the commercial area and the interaction of the identified flood extents and proposed stormwater mitigation measures. This includes consideration of any necessary earthworks and intended subdivision within the Structure Plan area;</p>	<p>These are detail matters for a stormwater resource consent process and are not appropriate to be included in a District plan</p>	<p>Reject</p>
<p>(vi) Specific information requirements for the design details of the stormwater measures. Details shall include:</p> <ul style="list-style-type: none"> <li>a. The size of detention, location, configuration of the outlet structures, discharge locations, and hydraulic performance of the on-site stormwater management devices; and</li> <li>b. The size of channels and the related erosion protection measures for primary, secondary and overland flow paths (on-site and off-site) including for the receiving waterways immediately downstream;</li> <li>c. Design and sizing information to manage water quality treatment wetlands and associated devices in accordance with BOPRC Stormwater Management Guidelines (Guideline Document 2012/01, or any subsequent replacement guideline for at-source controls, and water recycling options in areas zoned Commercial in parallel to the preparation of the discharge consent;</li> </ul> <p>All stormwater mitigation devices shall be designed, constructed and operated in accordance with the BoPRC stormwater management guidelines (Guideline Document 2012/01; updated at as December 2015) and, shall be implemented as</p>	<p>These are matters for detailed design and are specific Regional Discharge consent considerations. They have been drafted to read like resource consent conditions</p> <p>District Plans should also not have rules requiring compliance with Regional requirements. Such an approach is unlawful</p>	<p>Reject</p>

Provisions	Comments	Accept / Reject
approved in the Stormwater Management Plan.		
<p><b>Stormwater Management Plan (SMP) Compliance</b></p> <p><b>Performance standards:</b></p> <p>(i) Stormwater management solutions for subdivisions must be consistent with the SMP approved by Western Bay of Plenty District Council for the Te Puna Springs Structure Plan to ensure an integrated approach is taken to stormwater management; and</p> <p>(ii) Stormwater management solutions for subdivisions must be prepared by a suitably qualified and experienced practitioner.</p>	<p>This approach introduces a further step which is not defined by either the District or Regional Plan and will result in inefficient outcomes, unnecessary cost and process and uncertainty. Normally SMPs are adopted for very large scale catchment consents (as part of a Regional Stormwater discharge consent process) where future development may be unknown at the time of the Discharge consents approval and/or further work is required to manage specific effects following the granting of a Regional discharge consent</p>	<p>Reject</p>