

BEFORE THE IHP

Proposed Plan Change 92 Enabling housing supply to the Western Bay of Plenty District Plan

UNDER the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (Enabling Housing Act)

IN THE MATTER OF submissions and further submissions

BETWEEN Bay of Plenty Regional Council
Submitter

AND Western Bay of Plenty District Council
Proponent

SUPPLEMENTARY EVIDENCE OF KATHLEEN THIEL-LARDON

ON BEHALF OF THE BAY OF PLENTY REGIONAL COUNCIL TOI MOANA

DATED: 29/9/2023

Topic: Stormwater and Flooding

INTRODUCTION

1. My full name is Kathleen Thiel-Lardon. I am employed by Bay of Plenty Regional Council (Regional Council) as a senior environmental engineer/environmental engineering team leader. I have held this role since September 2015. My area of expertise is stormwater and flooding.
2. I prepared a primary brief of evidence dated 25th August 2023. Due to sickness, I could not attend the hearing to present that evidence to the Panel, but I undertook to provide a written response to any queries the Panel had once I had recovered.

PANEL QUERY

3. I understand that the Panel inquired whether a sub-catchment assessment is still a reasonable request in light of the development that is already occurring or allowed to occur by District Council Consents.

RESPONSE

4. In my opinion, an assessment should still be completed for the N1 catchment to determine whether existing and future development in the area will likely contribute to stormwater volume-based problems.
5. I am aware that the development pressure within this catchment has resulted in some developments applying for consents from both Councils in advance of Western Bay of Plenty District Council (WBOPDC) having undertaken a catchment-wide assessment. I also know that earthwork consents have been granted by Regional Council for parts of this catchment (Ōmokoroa Country Club and Classic Developments 88 Prole Road).
6. However, what has been authorised or developed so far is still only a proportion of the wider development that will be enabled for the sub-catchment under PC92.
7. Sub-catchment N1 is approximately 44.2 hectares (ha) in size. The approximate catchment boundary, as defined in the structure plan, is shown in Figure 1 below in dark blue. Nine identified development areas contribute to sub-catchment N1 in the pre-development stage.

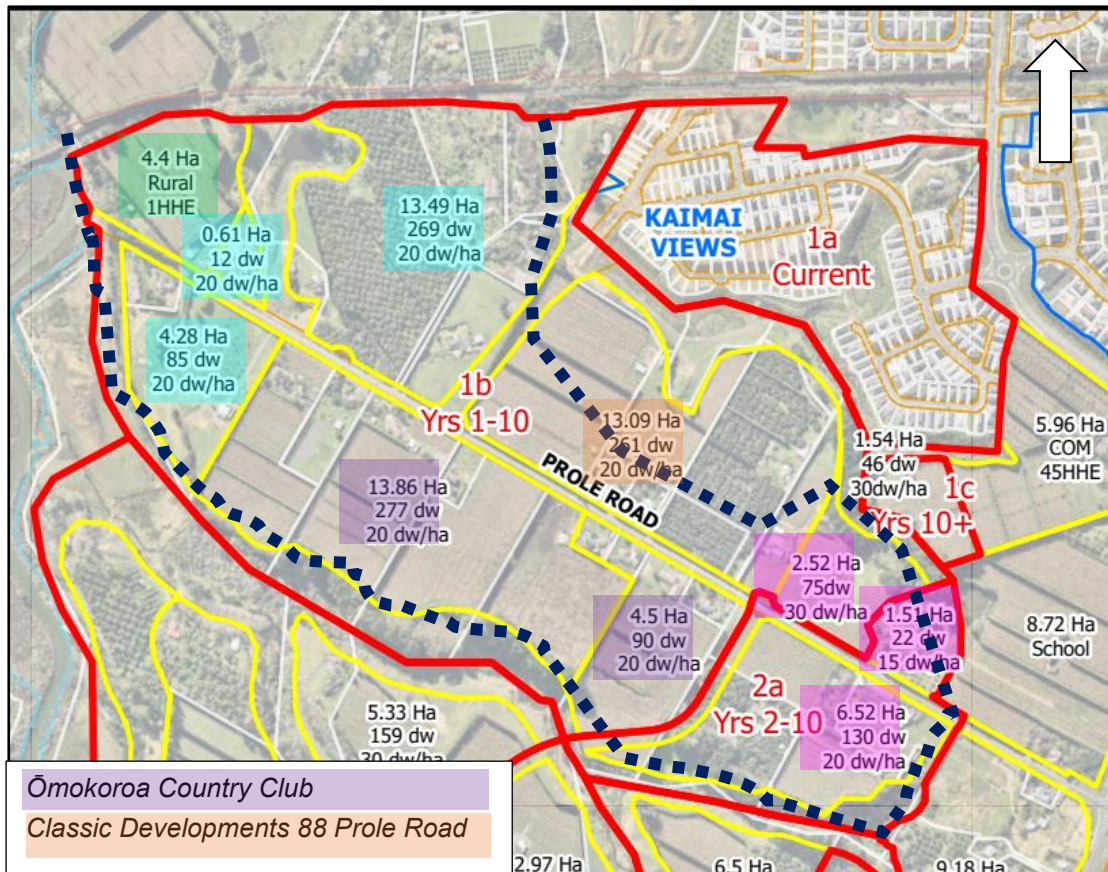


Figure 1: Extract from OMOKOROA STAGE 3 DEVELOPMENT SEQUENCING, INDICATIVE TIMEFRAMES, AND YIELD AREAS – overlaid with approximately catchment N1 boundary as per Structure Plan Map

8. The cyan highlighted areas in Figure 1 are areas we have yet to receive proposals for in sub-catchment N1 and are approximately similar in size to the Ōmokoroa Country Club site. Areas north of Prole Road will likely discharge towards the railway embankment. Areas to the south may be able to be discharged to the West. However, other site constraints must be considered before redirecting any sub-catchment flows.
9. The magenta highlighted areas in Figure 1 are also areas we have yet to receive proposals for in sub-catchment N1. Some areas may be able to be discharged to the South-West, but again other site constraints must be considered before redirecting any sub-catchment flows.
10. No permanent stormwater discharge consents have been granted by Regional Council in sub-catchment N1. Some of the developments (for example the Ōmokoroa Country Club) were proposed to be covered by the WBOPDC comprehensive stormwater consent, which was applied for in 2022. That consent has not yet been granted.

11. This is not a new issue. I have been involved in structure planning for Ōmokoroa since 2018 and have since that time raised the need to ensure there is no adverse effects on existing infrastructure downstream, that the gully system is not altered and used as ponding areas (i.e. for inline treatment) and that quality and velocity of discharges needs consideration.
12. Regional Council Engineers have provided technical advice on several occasions that recommends that WBOPDC assess further the suitability of the proposed measures, including the effects of the diversion of catchment flows into other catchments and the assessment of longer-duration events. This includes advice on district consent applications for Ōmokoroa Country Club and Classic Developments 88 Prole Road.
13. I cannot confirm whether WBOPDC has accepted the stormwater management proposed by the various developments in sub-catchment N1 (there are no decisions filed in Regional Council's system for the district consent applications).
14. Assuming there is a stormwater volume-based problem (which is not confirmed at present), solutions could include infrastructure upgrades, attenuation optimisation and volume reduction measures (such as limiting impervious areas) or a combination of these measures. These all need to be considered and planned for prior to allowing further development to ensure that cumulative effects are addressed in a proactive and integrated way, and not via a consent-by-consent approach, which Mrs Bosch covers in her evidence.
15. In my opinion, given that Regional Council has raised these issues previously and I understand that they remain unresolved, it is important to ensure that there is a clear requirement to address them prior to further development and in advance of stormwater discharge consent applications being lodged, so that cumulative effects can be considered and managed, and efficient mitigation options identified, in an integrated way. Several developments are still proposed to be enabled in the sub-catchment via PC92. The recommendation for an assessment prior to any further development being consented remains a reasonable one in my opinion.