

## Roxanne Davies

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**From:** Warren Hanley <warren.hanley@orc.govt.nz>  
**Sent:** Thursday, 4 March 2021 09:10 p.m.  
**To:** District Plan Submissions  
**Cc:** Anna Johnson; Emma Christmas  
**Subject:** ORC Submission on DCC Variation 2 to proposed District Plan (2GP) (A1450260)  
**Attachments:** ORCSUB~1.PDF

**Categories:** Roxy, To Do

Good evening,

Please find attached ORC's submission on DIS-2021-1 (2GP Variation 2).

We look forward to discussing this with you.

Regards,

Warren.



**Warren Hanley**  
SENIOR RESOURCE PLANNER LIAISON

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RMA Form 5  
Submission on a publicly notified proposed plan  
*Clause 6A of First Schedule Resource Management Act 1991*



**Otago Regional Council's Submission  
to the Dunedin City Council  
on Variation 2 to the  
Proposed District Plan (2GP)**

This is a submission on the Dunedin City Council's notified Variation 2 (DIS-2021-1) to the proposed District Plan (2GP).

The Otago Regional Council (ORC) lodged submissions on the proposed Second Generation District Plan(2GP).

Otago Regional Council could not gain an advantage in trade competition through this submission.

ORC represents a relevant aspect of the public interest and has an interest in the proposed plan greater than the interest that the general public has, as it is the regional authority for the Otago Region.

ORC's submission is that it supports, supports in part, opposes, and opposes in part specific aspects of Variation 2 and has identified the relevant sections, and any changes it requests within the body of this submission.

The Otago Regional Council wishes to be heard in support of this submission.

If others make a similar submission, the ORC will not consider presenting a joint case with them at a hearing.

Signature of submitter (or person authorised to sign on behalf of submitter):

A handwritten signature in black ink that reads "Sarah Gardner". The signature is written in a cursive, flowing style.

Sarah Gardner  
**Chief Executive**  
**Otago Regional Council**

4 March 2021

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Warren Hanley, Senior Resource Planner - Liaison

## **Introduction**

ORC supports in principle the DCC's purpose in proposing Variation 2 to respond to faster than anticipated city growth pressures, and acknowledges the need for additional residential land and residential opportunities.

ORC welcomes continuing to work constructively and positively with the DCC to discuss solutions to resolve the concerns raised in this submission.

### **1.0 Stormwater Package**

- 1.1. The stormwater package in Variation 2 is of critical importance to ORC.
- 1.2. ORC has statutory functions, powers and duties relating to land drainage, river management and flood protection.
- 1.3. Under the Resource Management Act it also has responsibilities for the quantity and quality of water in water bodies and for the coastal environment.
- 1.4. Subdivision, use and development of land necessarily impacts on these resources.
- 1.5. Subdivision, use and development, particularly of greenfield sites, creates additional stormwater discharges which need to be carefully managed.
- 1.6. Proper management of stormwater is necessary to avoid effects on people and property.
- 1.7. Ultimately stormwater discharges to rivers and drains either to the coast, or to rivers and drains, are managed by ORC.
- 1.8. The quality of water discharged can have adverse effects on the coastal environment.
- 1.9. The quantity and quality of water can have adverse effects in rivers.
- 1.10. The quantity and quality of water can have adverse effects on the capacity and operation of ORC land drainage and flood control infrastructure.
- 1.11. Subdivision, use and development can intercept existing flow paths or remove existing stormwater storage.
- 1.12. It is therefore necessary to have effective provisions in the District Plan to control stormwater.
- 1.13. In ORC's view any stormwater package must contain the following key elements:
  - a) Where a connection is available to DCC's stormwater network, that connection must be used;
  - b) Where a connection is not available, then, subdivision, use and development should not proceed without a stormwater management plan being approved through a resource consent process;
  - c) At a minimum, a restricted discretionary activity status should apply;
  - d) ORC should be recognised and treated as an affected party on any such consent application.
  - e) Implementation of the plan must be a condition of the consent;

- f) The plan must be prepared by a suitably qualified chartered engineer with qualifications and experience in hydrology, hydraulics, and stormwater management, design and construction;
- g) The objective of the plan must be to ensure there is no change in hydrological characteristics of the site;
- h) There must be no adverse effect on people, property, river levels and flows, land drainage schemes and flood protection schemes;
- i) The plan must address existing flow paths and on-site storage, whether natural or otherwise;
- j) The plan must provide for all stormwater from impermeable or semi-impermeable surfaces including roads, driveways, parks, access lots and the like;
- k) The plan must ensure that there is no change in the hydrological characteristics of the site as a result of subdivision, use and development;
- l) The plan must expressly anticipate and provide for climate change;
- m) Where ORC assets constitute, directly or indirectly, part of the receiving environment, the plan must ensure that there is no adverse effect on their capacity or the effectiveness and efficiency of their operation;
- n) There must be an ability to impose conditions to ensure the plan is implemented before subdivision, development or change of use;
- o) The stormwater assets must vest in the DCC to provide an ongoing assurance of maintenance and effective operation;
- p) The system must ensure good water quality; and
- q) The plan must provide for the contingency that the system fails to achieve its objective of ensuring there is no change in the hydrological characteristics of the site.

1.14 The stormwater management package in Variation 2 should be amended, to the extent necessary, to reflect these principles.

1.15 More detailed comments follow in Table 1 on specific provisions in the package.

## **2.0 Site Assessments**

2.1 ORC has reviewed the proposed zoning changes identified in the section 32 report '*Variation 2 Additional Housing Capacity Appendix 6 Site Assessments*' (*Site Assessments*). ORC has submitted on specific site assessments in Table 2.

## **3.0 General**

3.1 ORC requests DCC make all other amendments necessary and expedient to give effect to this submission and any consequential amendments.

**TABLE 1: ORC submission on DCC 2GP Variation 2 Plan Provisions**

Change ID		ORC Position/Comment	ORC Requests:
A1	Residential Zones (Management Zone 15 ) “Family Flats”	<p><b>Support in Part</b> There remain a number of references to ‘Family flats’ throughout Chapter 15, including an uncorrected 60m<sup>2</sup> limitation.</p> <p>ORC supports making it easier for smaller, ancillary dwellings to be created. Effects from these dwellings can be managed along with a main property dwelling.</p> <p>See for example including but not limited to Rules 15.5.2.1.(k), 15.5.2.2, 15.5.11.1.(v ).</p>	Any consequential amendments to the plan may be required for clarity and consistency.
C1	Social Housing Provisions	<p><b>Support in Part</b> ORC supports a more enabling framework for social housing. ORC also supports the intention to prioritise access to currently scarce infrastructure capacity for social housing developments, in effect by limiting access to the provisions from developments that are not ‘social housing’.</p> <p>However, the effect in terms of density standards (as noted elsewhere in the proposed Variation) can be controlled by other measures and any effects will occur irrespective of the person who ultimately resides in such developments.</p> <p>This Variation will assist give effect to Policy 4.5.3 (Urban Design) which requires:</p> <p>“Design new urban development with regard to:</p> <p>h) A diverse range of housing, commercial, industrial and service activities; i) A diverse range of social and cultural opportunities”</p>	The provisions should be clear that the prioritisation of access to the relaxed density rules apply to any development where infrastructure capacity constraints do not exist, enabling additional supply of generally smaller and more affordable dwellings for all potential residents.

D2	<b>Transport Connections in Subdivisions</b>	<p><b>Support</b></p> <p>This change promotes the requirements of the updated Otago/Southland Regional Land Transport Plans 2018-2021, specifically Policies 7, 8 and 13.</p> <p>It is important to consider and support options for alternative active modes of transport when considering urban design and infrastructure.</p>	This policy, and associated plan changes to support it, be implemented.
F1-1	<b>Service Connection Layout</b>	<p><b>Oppose</b></p> <p>This change is a significant element in the stormwater package. For example, under Rule 15.7.5, subdivision activities must comply with Rule 9.3.7. That means residential activities must provide service connections, in accordance with Rule 9.3.7, and now 9.3.7.AA, stormwater in new development mapped areas.</p> <p>However, 9.3.7.4.2 excludes reserves, access, network utilities and roads, many if not all, of which create impermeable surfaces which generate additional stormwater discharges. In new development mapped areas they ought to be included in the stormwater management systems required by 9.3.7.AA.</p>	Reserves, access, network utilities and roads should be included in stormwater management plans and systems required by this variation

F2-1	<b>Performance standards</b>	<p><b>Oppose</b></p> <p>It is not clear to ORC why a requirement to connect to the DCC stormwater network, if it is available, should not be mandatory. This appears to be counter to the overall direction of the other stormwater management provisions.</p>	Amend the variation to require connections to DCC's stormwater network, if available.
F2-2	<p><b>Policy 2.2.2.Y</b></p> <p>"Enable and encourage on-site low impact design stormwater management through policies and assessment rules that require stormwater management in new development mapped areas."</p>	<p><b>Oppose in Part</b></p> <p>The policy should be more directive to achieve "low impact design stormwater management".</p> <p>The policy uses "on-site". Some solutions may be located on other land. The words "on-site" are limiting and should be removed.</p>	<p>Change "enable and encourage" to "require".</p> <p>Substitute "that require" with "for".</p> <p>Delete the word "on site"</p>
	Policy 2.2.5.2	<p><b>Oppose in part</b></p> <p>For reasons of integrated management, it is important the proposed district plan retains a strategic policy that recognises that development activities controlled by DCC have the potential to result in adverse effects on the groundwater resource and/or public infrastructure. It is appropriate to require as a performance standard, solutions which will not create adverse effects on the natural environment, nor infrastructure networks.</p>	The provision from 2.2.5.2 related to stormwater management is retained and any associated changes elsewhere in the plan are made. It is acceptable to ORC if it is merged into Policy 2.2.2

	Policy 2.7.1.2.X	<b>Support in part</b>	Subject to the deletion of “on-site” in this policy and elsewhere in the “stormwater package”, ORC supports this provision.
	<p>Policy 9.2.1.Y  <i>“Only allow subdivision activities in a new development mapped area where:</i>  <i>a. an on-site stormwater management system that is designed for the whole NDMA and is installed in full or in planned stages prior to development will ensure there is no increase in the pre-development peak stormwater discharge rate from the site into the stormwater public infrastructure (at any point); or</i>  <i>b. where this is not practicable, any adverse effects from an increase in discharge on the stormwater public infrastructure are no more than minor.”</i></p>	<b>Oppose in part</b>	<p>This policy needs to be revised:  To remove the limitation of “on-site”;</p> <p>To clarify the letters “NDMA” in paragraph a;</p> <p>To provide for no change in hydrological effect from the subdivision. The goal of no increase in the pre-development peak stormwater discharge is not sufficiently comprehensive. Other factors such as volume of runoff, duration, and time of concentration must be included. See further the submission on 9.9.X.</p> <p>The policy provides for discharges of stormwater only into the “stormwater public infrastructure”. The definition of “public infrastructure” as amended by Variation 2 (F2-3) suggests that this policy only applies to discharges into the DCC network. This will not always be the case. Further, the DCC network discharges to ORC drains and waterbodies managed by ORC. There are also implications for the efficient and effective operation of ORC’s flood protection works. There may not be any discharge at any point into the DCC stormwater system. Remove the words “into the stormwater public infrastructure at any point”.</p> <p>Add “integrated” before stormwater management system.</p> <p>There is uncertainty in 9.2.1.Y.(b).</p> <p>Paragraph (b) should be deleted</p>
	<p><b>Policy 9.2.1.X</b>  <i>“Require development in a new development mapped area that creates impermeable surfaces to be connected to the integrated communal on-site stormwater management system that meets Policy 9.2.1. Policy 9.2.1.Y.”</i></p>	<b>Oppose in part</b>	<p>“Require” must be replaced by “only allow”. A consent process is necessary to assess a stormwater management system for the whole of the development. The policy must be amended accordingly.</p> <p>There are differences in wording between 9.2.1.Y and 9.2.1.Z which is potentially confusing.</p> <p>The word “communal” does not appear in 9.2.1.Y. It should be deleted from 9.2.1.X. Stormwater systems should be vested in the DCC to achieve surety of effective and efficient operation and maintenance over time. There is a real risk that no one will take responsibility for a “communal” system and it will not be maintained and effective over time.</p> <p>The word “on-site” should be deleted to remove the limitations inherent in it.</p> <p>The word “integrated” does not appear in 9.2.1.Y but it does in 9.2.1.X. It should appear in both places.</p>



	<p><b>9.3.7.AA Stormwater:</b>  <i>“a. In a new development mapped area, all development that creates an impermeable surface must:</i>  <i>i. connect to a communal stormwater management system that services the new development mapped areas; except:</i>  <i>1. prior to the communal stormwater management system being installed, any development that creates less than 60m2 of impermeable surface is exempt from this standard.</i>  <i>b. Activities that contravene this performance standard are restricted discretionary activities.”</i></p>	<p><b>Oppose in part</b></p>	<p>This is a new standard for development in a NDMA. The standard could be better expressed: “in a new development mapped area with more than 60m2 of impermeable surface in total, all development must connect ...”.</p> <p>The word “communal” should be deleted.</p> <p>The word “integrated” should be added.</p> <p>The word “communal” should also be deleted from note A.</p> <p>Note A records the stormwater management system will be considered in the assessment of a subdivision application. It presumes that subdivision will precede development. That is not necessarily the case. The policy framework and rules must cover development without subdivision</p> <p>A stormwater management plan must be mandatory for new development mapped areas. If there is no subdivision consent providing for a comprehensive stormwater management system, then as a minimum, a restricted discretionary activity consent must be obtained for any development creating permeable surface area greater than 60m2. Add after “stormwater management system” the words “installed in accordance with a subdivision consent for the new development mapped area”.</p>
	<p><b>9.5.3.Z</b></p>	<p><b>Oppose in part</b></p>	<p>This assessment rule must be amended to give effect to the changes sought in this submission.</p>
	<p><b>9.6.2.X</b></p>	<p><b>Oppose in part</b></p>	<p>This assessment rule must be amended to give effect to the changes sought in this submission.</p>
	<p><b>9.9.X Stormwater management plans</b></p>	<p><b>Oppose in part</b></p>	<p>A stormwater management plan meeting the requirements of 9.9.X must be approved through a consent process in all the circumstances set out in Policies 9.2.1.Z, 9.2.1.Y and 9.2.1.X.</p> <p>These should have at least restricted discretionary activity status.</p> <p>ORC should be recognised as an affected party to any consent application requiring a stormwater management plan</p> <p>The objective must be to ensure there is no change in hydrological characteristics of the site (including peak flow, volume of runoff, duration, and time of concentration) in all situations (not limited to the 1% AEP event).</p> <p>The bottom lines must be no impact on the receiving environment, in particular people, property, river levels and flows, drainage schemes and flood protection schemes.</p> <p>Where the discharge will affect, directly or indirectly, ORC infrastructure, the plan must ensure its capacity will not be exceeded and that the ORC assets can operate effectively and efficiently in all situations, not just 1% AEP events.</p> <p>Provision must be allowed for climate change including more frequent and more intense rainfall events.</p>

			<p>The system must provide for stormwater runoff from all impermeable and semi-impermeable surfaces including roads, vehicles parks, access lots, driveways and the like.</p> <p>The stormwater plan must be prepared by a chartered engineer with qualifications and experience in hydrology, hydraulics, and stormwater management, design and construction.</p> <p>There are often swales or other flow paths which convey water or depressions which hold water that can disappear when a site is developed. These flows paths may originate on site, or off site. Development can cause water to be diverted or dammed into other property. These matters need to be addressed by the stormwater management plan and infrastructure. So, for example, water coming on to the site or ponding on site must be accounted for in the plan and accommodated by the new stormwater infrastructure.</p> <p>Stormwater quality must be, as a minimum, no worse post development than pre-development.</p> <p>Methods to achieve the prescribed quality of the stormwater discharged must form part of the infrastructure.</p> <p>Stormwater assets must vest in DCC. ORC is opposed to private or commercial schemes.</p> <p>The plan must provide for the contingency that the system fails to achieve its objective of ensuring that there is no change in the hydrological characteristics of the site.</p>
	<b>15.3.4.1</b>	<b>Oppose in part</b>	This rule may need to be amended to give effect to the other submissions made on the stormwater package.
	<b>15.6.X</b>	<b>Oppose in part</b>	<p>This rule may need to be amended to give effect to the other submissions made on the stormwater package. Assessment Rules 15.10.4.Y and 15.11.5.Y</p> <p>These rules provide for assessment of contraventions of maximum building site coverage and impermeable surfaces standards. In each case they cross reference Rule 9.5. However, that rule contains many provisions. Greater precision would be helpful.</p> <p>This rule may need to be amended to give effect to the other submissions made on the stormwater package.</p>

F2-3	Public Infrastructure definition	<b>Oppose in part</b>	<p>This definition is amended by adding the words “and in the case of stormwater infrastructure may include drains and open channels owned and managed by DCC”.</p> <p>The addition makes the definition uncertain. The word “may” leaves doubt about whether drains and open channels are included or not. Uncertainty in the definition of a term which forms part of policies and rules in the plan is not acceptable. Drains and open channels must either be in or out.</p> <p>Further, it must be made clear that the definition applies only to DCC infrastructure and does extend to ORC assets.</p>
	<b>Policy 9.2.1.2</b>	<b>Support</b>	<p>ORC does not oppose the deletion of this policy.</p>

	Policy 9.2.1.Z(b)	<b>Oppose in part</b> Subparagraph b is stated to apply any stormwater that will flow through ORC stormwater system at any point. ORC does not operate stormwater system as such. It does operate drainage networks and flood protection schemes which stormwater may enter. It also manages rivers into which most stormwater ultimately discharges	This paragraph should be amended to provide that if the stormwater flows into any ORC drain or any part of ORC flood management protection scheme, there must be capacity and no adverse effect on the drain or scheme. If the stormwater discharges into any river, there must be no change in flows or levels as a result of the activity.
	<b>Assessment Rules 9.4.1.1, 9.5.3.11, 9.6.2.2, 9.8.2.5 and 27.11.3.1</b>	<b>Support in part</b>	Amendments should be made to these assessment rules to align with new Policy 9.2.1.Z, if amended in accordance with this submission.
	<b>Various Rules – stormwater management in Residential Zone</b>	<b>Support in part</b>	<p>Rule 15.10.4.10C and D There is cross reference to 9.5. It is unclear which part of 9.5 is specifically intended to be referenced. This should be clarified.</p> <p>Rule 15.11.2.5.A This rule cross references Rule 9.6. The precise part of Rule 9.6 which is relevant should be specified.</p> <p>Rule 15.11.2.5.X ORC supports this provision.</p> <p>Rule 15.11.3.X ORC supports this new provision. The precise part of Rule 9.6 which is relevant should be specified.</p> <p>Rule 15.11.4.1.C The matters of discretion should include for subdivision activities, stormwater management. The precise part of Rule 9.6 which is relevant should be specified.</p> <p>Rule 15.11.4.1.X The matters of discretion should include for subdivision activities, stormwater management. The precise part of Rule 9.6 which is relevant should be specified.</p>

F1-6	<b>Policy 2.2.5.2 wastewater provisions</b>	<p><b>Oppose in part</b></p> <p>For reasons of integrated management, it is important the proposed district plan retains a strategic policy that recognises that development activities controlled by DCC have the potential to result in adverse effects on the groundwater resource. It is appropriate to require as a performance standard, solutions which will not create adverse effects on the natural environment, nor infrastructure networks.</p>	The provision from 2.2.5.2 related wastewater management is retained and any associated changes elsewhere in the plan are made. It is acceptable to ORC if it is merged into Policy 2.2.
F3-2	<p><b>Wastewater provisions</b></p> <p>Policy 2.7.1.2, Policy 9.2.1.BB, Note 9.3.7.A (b), Rule 9.6.2.Y, Rule 9.9.Y, Rule 15.11.5.Z</p>	<p><b>Oppose in part</b></p> <p>ORC supports in principle the provisions that will ensure appropriate consideration and management of wastewater within New Development Mapped area which must connect to the DCC's public wastewater infrastructure network.</p> <p>ORC is supportive of on-site detention of wastewater to manage flows in the NDMA so as to not create adverse effects on the public wastewater infrastructure network.</p> <p>However, as with ORC's submission on stormwater systems, wastewater systems should be vested in the DCC to achieve surety of effective and efficient operation and maintenance over time - particularly as it assists to ensure the network's capacity is not exceeded. There is a real risk that no one will take responsibility for "communal" system and it will not be maintained and effective overtime.</p>	<p>References to the word "communal" should be deleted in reference to stormwater detention systems.</p> <p>The word "integrated" should be added in place of "communal".</p> <p>Clarity added in the plan the detention system is to be vested with the DCC</p>
F2-5	<p><b>Impermeable Surfaces</b></p> <p>Rule 15.4.x</p>	<p><b>Support in part</b></p>	ORC supports this rule as far as goes but it should apply to both development and subdivision.

**Table 2: ORC submission on Site Assessment and Zoning Changes**

Map	Location	Zoning change	ORC Position/comment	ORC Request
GF 01	155 and 252 Scroggs Hill Road	RR1 to LLR1	<p><b>Oppose</b>  ORC is concerned at the density of development proposed under the rezoning and the effects of that development on water quality.</p> <p>This zone is within the Otokia Creek catchment which features an Intermittently closing and Opening Lagoon (ICOLL).</p> <p>The catchment is monitored and is known to be sensitive in terms of contact recreation standards – especially in the area behind Brighton Beach.</p>	Zoning is applied that permits much less density of development, or that a significantly higher quality on-site wastewater treatment solution is required under the proposed zoning.
GF02	Gladstone Road South	Rural to GR1	<p><b>Oppose in part</b>  While a lower risk hazard on a large section of the site, the section 32 report has assessed the mapped Hazard 3 alluvial fan as presenting no issues. ORC would expect the hazard, while low, would be acknowledge and what risk may or may not need to be mitigated , including from stormwater run-off etc. The section 32 site assessment notes Stormwater presents significant issues.</p> <p>ORC is also unsure why a majority of area was not rezoned to the same density of LLR1 as per neighbouring area. The section 32 report notes this will create some issues</p>	<p>The mapped alluvial fan risk is appropriately recognised and any mitigation that might be required in increasing the potential for relatively high residential activity on the site.</p> <p>Greater clarity as to why the significant increase in proposed density is deemed most appropriate in light of the effects this will create and/or need to be mitigated.</p>
GF15	Highcliff Road	RR2 to LLR1	<p><b>Oppose in part</b>  ORC's supports in part as the section 32 report has identified there are options which, subject to further investigations, will allow for managing post development flows appropriately. ORC interest is that the increased development could have adverse effects on water quality within the freshwater catchment and the coastal waters but this is not addressed in the s32 assessment.</p>	<p><b>ORC requests</b> that further information is provided to clarify how water quality will be managed in the downstream receiving environments.</p>
GF16	Highcliff Road	RR2 to T&S		
GF17	Highcliff Road	RR2 to Recreation		
RTZ2	Selwyn Street	RR2 to GR2	<p><b>Oppose</b>  As indicated elsewhere in this submission, ORC is opposed to any management of stormwater in the Lindsay Creek catchment using the proposed stormwater management provisions of Variation 2. ORC agrees with the section 32 report assessment for this zone that this rezoning could result in adverse effects from stormwater on downstream catchment area. Until an appropriate method for managing stormwater in this zone can be agreed to by ORC, the zoning must remain RR2.</p>	<p><b>ORC requests:</b>  The zoning is unchanged from Rural Residential 2.</p>

## Roxanne Davies

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**From:** Peter Rawson  
**Sent:** Wednesday, 14 April 2021 10:56 a.m.  
**To:** Roxanne Davies  
**Subject:** FW: ORC submission to Variation 2 - queries for clarification

**Categories:** Roxanne dealing with

Hi Roxy

The email below is from Warren Hanley of ORC and relates to the correction of minor errors in the Otago Regional Council submission (number 271) to Variation 2

Can you please add this email to G drive, Spoken and include in physical submissions folders for the Otago Regional Council submission

I will update the moderated submission in Spoken accordingly

Thanks

Regards

Peter

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**From:** Warren Hanley  
**Sent:** Wednesday, 14 April 2021 9:31 a.m.  
**To:** Peter Rawson  
**Cc:** Anita Dawe ; Alastair Logan  
**Subject:** RE: ORC submission to Variation 2 - queries for clarification

Thanks Peter for picking up on those. I've referred back to ORC's submission and the relevant variation 2 amendments proposed in the 2GP and provided our updated comments.

If you have any more questions, please feel welcome to drop me an email.

Warren.

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**From:** Peter Rawson <[Peter.Rawson@dcc.govt.nz](mailto:Peter.Rawson@dcc.govt.nz)>  
**Sent:** Friday, 9 April 2021 10:56 a.m.  
**To:** Warren Hanley <[warren.hanley@orc.govt.nz](mailto:warren.hanley@orc.govt.nz)>  
**Subject:** ORC submission to Variation 2 - queries for clarification

Hi Warren

I am summarising the ORC's submission on Variation 2 and had a few queries that it would be helpful to have clarification on.

Below I have created a table which replicates the ORC submission, with a column to the right with my question.

I would appreciate it if you could email me back with answers to my questions, to ensure I have summarised the ORC submission correctly.

You will note I have added a column to the table below titled 'ORC response' where you can respond

Change ID		ORC Position/Comment	ORC Requests:	DCC Query	ORC response
F2-2	Policy <a href="#">2.2.5.2</a>	<b>Oppose in part</b> For reasons of integrated management, it is important the proposed district plan retains a strategic policy that recognises that development activities controlled by DCC have the potential to result in adverse effects on the groundwater resource and/or public infrastructure. It is appropriate to require as a performance standard, solutions which will not create adverse effects on the natural environment, nor infrastructure networks.	The provision from <a href="#">2.2.5.2</a> related to stormwater management is retained and any associated changes elsewhere in the plan are made. It is acceptable to ORC if it is merged into <a href="#">Policy 2.2.2</a>	The reference to 'Policy 2.2.2' (which I have highlighted in yellow). This policy does not exist – policies are 4 numbers long. Does this instead mean a policy underneath Objective 2.2.2, for example new Policy 2.2.2.Y, Objective 2.2.2 itself (or both Objective 2.2.2 and its underlying policies)?	Agree with the reference error, it should read ' <i>It is acceptable to ORC if it is merged into Objective 2.2.2 and any consequential policy amendments of that Objective</i> )
F1-6	Policy <a href="#">2.2.5.2</a> wastewater provisions	<b>Oppose in part</b> For reasons of integrated management, it is important the proposed district plan retains a strategic policy that recognises that development activities controlled by DCC have the potential to result in adverse effects on the groundwater resource. It is appropriate to require as a	The provision from <a href="#">2.2.5.2</a> related wastewater management is retained and any associated changes elsewhere in the plan are made. It is acceptable to ORC if it is merged into <a href="#">Policy 2.2.</a>	Similar to the above query – there is no Policy 2.2. What policy (or objective) is being referred to?	Agree, the reference should be to the proposed Objective 2.2.2 (which includes 'Environment Performance)



		performance standard, solutions which will not create adverse effects on the natural environment, nor infrastructure networks.			
F3-2	<b>Wastewater provisions</b> Policy <a href="#">2.7.1.2</a> , Policy 9.2.1.BB, Note 9.3.7.A (b), Rule 9.6.2.Y, Rule 9.9.Y, Rule 15.11.5.Z	<b>Oppose in part</b> ORC supports in principle the provisions that will ensure appropriate consideration and management of wastewater within New Development Mapped area which must connect to the DCC's public wastewater infrastructure network. ORC is supportive of on-site detention of wastewater to manage flows in the NDMA so as to not create adverse effects on the public wastewater infrastructure network. However, as with ORC's submission on stormwater systems, wastewater systems should be vested in the DCC to achieve surety of effective and efficient operation and maintenance over time - particularly as it assists to ensure the network's capacity is not exceeded. There is a real risk that no one will take responsibility for "communal" system and it will not be maintained	References to the word "communal" should be deleted in reference to <b>stormwater</b> detention systems. The word "integrated" should be added in place of "communal". Clarity added in the plan the detention system is to be vested with the DCC	Because Variation 2 change ID F3-2 relates to 'Wastewater provisions' should the reference to 'stormwater' (which I have highlighted in <b>yellow</b> ) detention systems instead be 'wastewater' detention systems?	Agree, reference should be to 'wastewater detention systems'  Also our reference to 'Note 9.3.7.A (b) [I've highlighted in red] I believe should be 'Note 9.3.7.ZA (b)'

		and effective overtime.			
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Thank you

I will give you a call to discuss.

Regards

Peter

Peter Rawson

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CITY DEVELOPMENT**

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