

2 September 2024

Conniston Park Ltd
C/- David Harford Consulting Ltd
PO Box 603
Ashburton

Via Email: david@dhconsulting.co.nz

Dear David,

Private Plan Change Request (Ref: PC0003/23) – Coniston Park Ltd, Farm & Racecourse Roads, Ashburton

I am writing in relation to the above Plan Change request, and further to the further information requested on 27 February 2024. I acknowledge receipt of the information requested. The Council has reviewed the additional information received, and this letter sets out:

- The additional information requested relating to the Plan Change request, arising from the receipt of the information provided.
- Changes to the request that have been identified by Council officers as being appropriate
- Comments provided by Council officers on more detailed aspects of the information provided with the request, but which do not form part of the plan change itself.

PART 1 - Further information

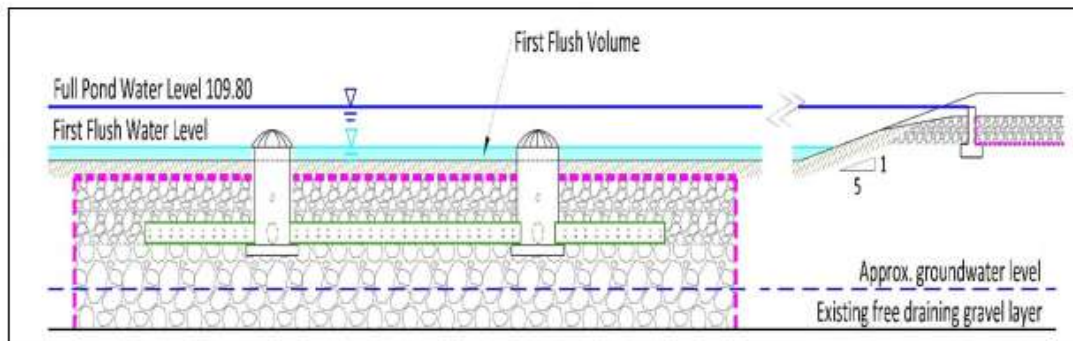
Part 1 of this letter sets out the additional information that is now requested in accordance with clause 23(2) of Schedule 1.

Management of Stormwater

While detailed design of stormwater management is not required at the plan change stage, sufficient certainty is required that the treatment and attenuation concept is feasible and will meet the conditions of the Council's global stormwater consent. It is also necessary to ensure that the Indicative Stormwater Management Areas (SMAs) proposed on the Outline Development Plan (ODP) are sufficiently sized to service the development anticipated by the rezoning. On this basis, the following is requested:

1. Assessment of a 1% Annual Exceedance Probability design for stormwater.
2. For stormwater neutrality calculations, assessment against 80% pre-development flow/volume, as per the Council's Stormwater Design Guidelines (see Section 7.2 / Eqn 8-1 / Eqn 8.4).
3. A full analysis of seasonal high-water table (SHWT) and historic highest groundwater. This is required to give confidence in a soakage design as the groundwater and soakage are concerns for this site and can be an issue around this area. The assumptions related to groundwater and available soakage directly relate to the size of the SMAs proposed. The Infrastructure Servicing report mentions a groundwater depth of 2.2m – 3.8m bgl, but this appears to be a moment in time snapshot from the soakage testing conducted.
4. Confirmation of the highest groundwater level across the site, especially in the areas of the proposed SMAs, how frequently do these highs occur, and for what duration.

5. Confirmation of whether the piezometers recommended in the servicing report been installed on site.
6. Confirmation of the separation between any soakage from the SHWT. (1m is likely required for the global consent, but a smaller separation could be accepted from the historically high groundwater level.) The current drawings show that the rapid soakage has existing groundwater level within the middle of the soakpit, which is effectively negative separation to groundwater.



7. Consideration of the following comments:
 - a. Soakage testing has been conducted with groundwater exposed. Based on the results, there is limited confidence that soakage with appropriate separation to groundwater is feasible and appropriate. The servicing report also notes: *"infiltration testing was undertaken at the end of summer (27 March). Significantly lower levels of infiltration would be expected when groundwater levels rise"*
 - b. Soakage and the potentially high groundwater raise concerns with soakage of roof water on the lots (the attenuation tanks will help) and the depth and suitability of the SMAs.
 - c. First flush treatment depth is 18mm for the Council's global consent – not 25mm.
 - d. Best practice for first flush and attenuation basins, especially for sites this big, is to separate the first flush and attenuation basins and for them to be managed via a splitter box.
 - e. If the swale from Coniston Park (which runs alongside Farm Road), which is used as the treatment and attenuation device from that subdivision, is removed due to the subdivision upgrades for the plan change site, the additional stormwater flow will need to be accounted for within the stormwater systems for the plan change site.
8. Taking into account the above, please consider whether changes are required to the ODP in relation to the size and location of the Indicative SMAs.

Reserves

9. For the proposed reserve area adjoining Wakanui Creek, please provide cross sections of the creek and esplanade reserve (near Lots 26 and 48 on the Subdivision Layout Plan) so that the appropriate width for this reserve can be determined and agreed prior to the finalisation of the ODP.

Please provide the requested information or provide written confirmation if you do not agree to provide the requested information. However, if the requested information is not provided, Council may reject the request or decide not to approve the plan change request, if it is considered that there

is insufficient information to enable Council to consider or approve the request (clause 23(6) of Schedule 1).

Once all requested information is provided, Council will consider its adequacy and within 15 working days of receiving the information may require additional information relating to the request (clause 23(2) of Schedule 1) and/or commission a peer review report of any aspect of the request (clause 23(3) of Schedule 1).

PART 2 – Changes Requested by the Council

Part 2 of this letter sets out changes to the ODP that have been identified by Council officers as being appropriate. Please consider these requests and amend the ODP accordingly:

- a. The way that 'green areas' are described and displayed on ODPs can create expectations around what reserves are required by the Council and which ones are eligible for reserve contribution credits. Utility reserves (i.e. local purpose reserves) should be distinguished from esplanade reserves. With respect to recreation reserves, the Council does not consider that any such reserves are appropriate for this development and therefore should not be included in the ODP. To provide certainty for future development, the size of these areas should also be provided on the ODP. Please amend the ODP so there is clear delineation between the various types of reserves proposed. The areas and the widths of these areas should also be included, consistent with the specific requests below.
- b. The proposed "Local purpose reserve with indicative pedestrian link to Wakanui Creek" (Lot 302 on the Subdivision Layout Plan) is supported, as this provides an important pedestrian linkage to the Ashburton Lyndhurst Irrigation area. This linkage should be increased to a minimum 10m width to improve its visibility and to be consistent with CPTED principles. It should be labelled as 'Local Purpose Reserve (Walkway)' and its width increased to 10m.
- c. The proposed open green space beneath the above reserve (Lot 301 on the Subdivision Layout Plan) is not supported and should be removed from the ODP. The rationale for this reserve is not clear. It is considered too small for a neighbourhood park and as it is located within the 400m distance from Argyle Park it is considered unnecessary. Please remove this as an open space area on the ODP.
- d. The proposed green space (Lot 305 on the Subdivision Layout Plan) is not supported as a reserve area. It is noted that this space is labelled as "potential link to neighbouring land" but the Council does not consider this to be necessary as either a pedestrian or roading link. Please remove this as an open space area on the ODP.
- e. The primary purpose of the proposed green space link connecting streets (Lot 304 on the Subdivision Layout Plan) appears to be to drain stormwater. The provision of a pedestrian link through this reserve by the developer is supported, but the primary purpose should be reflected through labelling this area as 'Local Purpose Reserve (Drainage)' and details of its width should be included on the ODP.
- f. For the proposed indicative stormwater management areas (Lots 300 and 303 on the Subdivision Layout Plan):
 - a. the proposed pedestrian cycle link/route provided by the developer through Lot 303 is supported. Lot 300 should have a similar pedestrian link/path on its western boundary connecting the road to the pedestrian link along Wakanui Creek. Please amend the ODP to include this additional pedestrian link.
 - b. these are shown as stormwater management areas but with reserve areas around the perimeters. As the primary purpose of these lots are for stormwater management they should be shown on the ODP in entirety as either 'Indicative Stormwater Management' or 'Local Purpose Reserve (Stormwater Management)', with the entire area shaded blue.

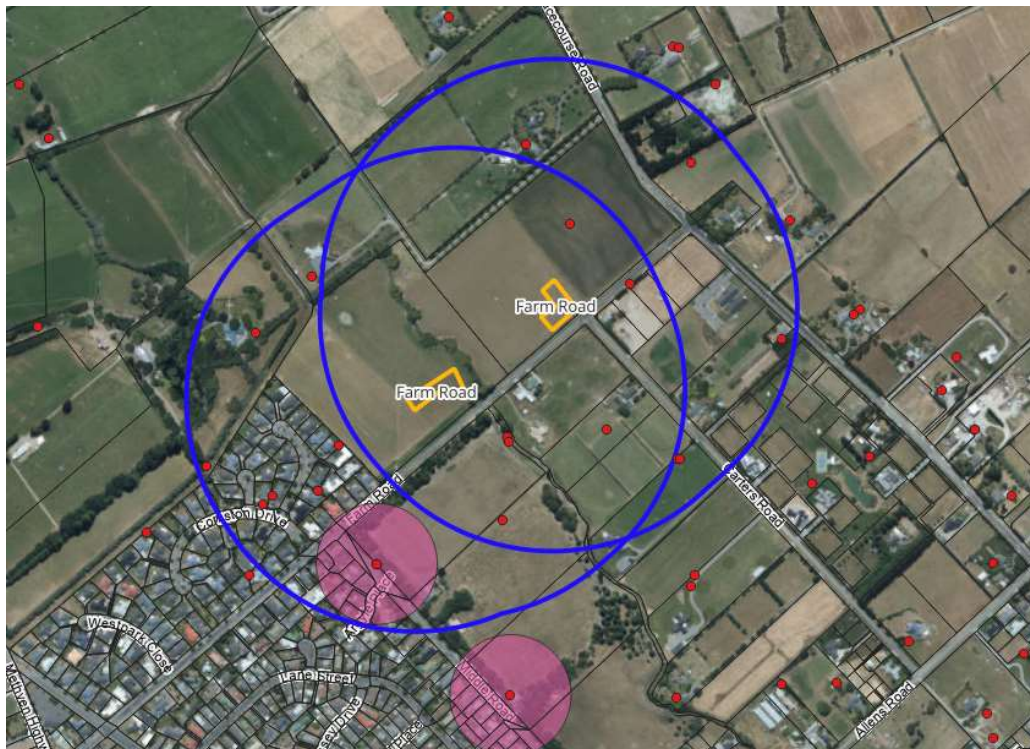
- g. The proposed reserve area adjoining Wakanui Creek should be labelled as an 'Esplanade Reserve' and details of its width should be included on the ODP (noting this links to the earlier request to provide cross sections in order to determine appropriate width for this reserve before the ODP is finalised).

PART 3 – Comments Provided by Council Officers for Future Reference

Part 3 of this letter sets out comments which have been provided by Council officers on more detailed aspects of the information provided with the request, but which do not form part of the plan change itself (including the Concept Subdivision Scheme Plan and Engineering detail contained in Annexure 4 to the Request). These comments are provided on a without prejudice basis and are intended to assist the applicant in planning for development of the site, should the plan change request be approved. It should be noted that the Council's comments are preliminary only and should not be taken as full and final comments on the proposed subdivision shown in the concept plan.

Engineering Matters

- Future design for the waterway will need to look at culvert(s) crossing the Wakanui Creek and the flood capacity of the waterway.
- A consent from ECan will be needed for construction-phase stormwater discharges, as the site is 16.3 ha and includes Wakanui Creek, and the Council do not accept these high-risk sites into the global consent where it relates to construction-phase stormwater (even if all stages are less than 2ha).
- The orifice for the rain tanks seems quite large; tanks need to be full throughout the critical/overflow portion of the event to be considered appropriate for storage offsetting. Additionally, first flush and therefore time at which rapid soakage start should not include the volume of the roofs that are being captured by the rain tanks.
- The Council's global consent requires a 'capture zone' analysis, as described in the consent conditions. A 365m buffer is required for rapid soakage systems, which is approximately shown below.



Reserve Matters

- It is expected that the proposed "Local purpose reserve with indicative pedestrian link to Wakanui Creek" (Lot 302 on the Subdivision Layout Plan) will be vested as Local Purpose Reserve (Walkway) and provided by the developer at their cost as part of providing pedestrian linkages through the subdivision.
- The proposed green space link connecting streets (Lot 304 on the Subdivision Layout Plan), proposed indicative stormwater management areas (Lots 300 and 303 on the Subdivision Layout Plan) and proposed reserve area adjoining Wakanui Creek are not eligible for reserve contribution credits.
- The construction of all pathways within reserve areas should be at the developers' expense.

Roading Matters

- As part of future subdivision of the area, Farm Rd and Racecourse Rd frontages will need to be upgraded (to include kerb and channel, footpaths and streetlights). No swales are to be located on the roadside. If needed for stormwater treatment from this or existing subdivisions, then provision to connect to the retention/treatment areas of the new subdivision will be required.
- 11 m wide kerb to kerb on both roads (Farm Rd and Racecourse Rd) i.e. 5.5m from centreline.
- Underground power will be required on Racecourse Rd and discussion with EA Networks will be required.
- Internal roads are to have AC rather than chip seal.
- No kerb and channel to separate traffic lane from parking lane on main road.
- No pavers or exposed aggregate at intersections and no trees near intersections that restrict visibility of Give Way or Stop signs.

Other Matters

- Only one species of street tree per street should be used. Street trees are required on both sides of roads.
- Fencing covenants restricting the height and permeability of fences and limiting the Council's liability for construction and maintenance costs will be required for all lots with common boundaries along reserves.
- Entrance features such as walls and signs will need to be on private lots so Council is not liable for their ongoing maintenance.

Please do not hesitate to contact me if you have any questions or concerns regarding the above request or further processing of the request.

Yours sincerely



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