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22 August 2016

Whanganui District Council
 PO Box 637
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 WHANGANUI 4540

File ref: RAI 0407
 2016
 LT:PT

Delivered via Email to
Leayne.Huirua@wanganui.govt.nz

Dear Sir/Madam

HORIZONS SUBMISSION TO PC52 (GENERAL PROVISIONS AND NZS4404:2010)

Please find enclosed Horizons Regional Council's submission to Proposed Plan Change 52. Please also find attached a copy of Horizons feedback letter to the draft version of this Plan Change (Annex A) and a copy of our suggested changes to the wastewater guidelines (Appendix 1 to Annex A).

Horizons wishes to be heard in respect to this submission.

We welcome the opportunity to work with the Wanganui District Council to resolve or narrow any issues raised in our submission prior to the Hearing.

Yours sincerely



Lisa Thomas
COORDINATOR DISTRICT ADVICE

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

Encls. Horizons Submission on Proposed Plan Change 52
 Annex A – Copy of Horizons feedback letter on the draft Plan Change
 Appendix 1 to Annex A – Tracked changes version of the Wastewater
 Guidelines

Resource Management Act 1991

Submission on a Publicly Notified Plan Change to the Wanganui District Plan

In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

To: Wanganui District Council
PO Box 637
Wanganui

Name: Horizons Regional Council

Contact Person: Lisa Thomas, Coordinator District Advice

Thank you for the opportunity to make a submission on Proposed Plan Changes 51 and 52 to the Wanganui District Plan.

1. We **could not** gain an advantage in trade competition through this submission.
 2. The specific provisions of the proposed plan change that our submission relates to are outlined below.
 3. Our submission points are detailed below.
 4. The decisions sought from Wanganui District Council are detailed below.
 5. We **do** wish to be heard in support of this submission.
 6. We would welcome any opportunity to attend informal or formal pre-hearing meetings with Wanganui District Council and other parties to discuss points of contention.
 7. If others make a similar submission we **would** be prepared to consider presenting a joint case with them to any hearing.
 8. **Address for Service:** Horizons Regional Council
Private Bag 11025
Palmerston North
- Day time phone No:** (06) 9522 908
Email: lisa.thomas@horizons.govt.nz

Signed:



Lisa Thomas

COORDINATOR DISTRICT ADVICE

Dated: 22 August 2016

BACKGROUND

1. Horizons' submission specifically relates to Proposed Plan Change 52 (Appendix 1 – NZS4404:2010 Update). We do not wish to make any comments in relation to Proposed Plan Change 51 (Miscellaneous Provisions). Horizons provided feedback on the draft version of the proposed plan change provisions in May 2016. A summary of the issues raised in our submission can be found on pages 7 and 8 of the Section 32 Report for Proposed Plan Change 52. A copy of our feedback letter is attached as Annex A to this submission.
2. Horizons supports the intention of Plan Change 52 (PC52), being to update the Engineering Document to ensure consistency with NZS4404:2010 and to remove duplications between the Standard and the Engineering Document. We do not wish to comment on the technical requirements of the Engineering Document, as this largely relates to reticulated services that Horizons does not have any responsibility for. However, the following feedback includes support for those provisions that relate to matters of interest to Horizons, and some suggested changes that we think would be useful for plan users.

PART 1 – GENERAL REQUIREMENTS AND PROCEDURES

3. Horizons supports the deletion of the note that referred to recognised datums (Moturiki 00 + City Datum 100.06 so Moturiki level + City level – 100.06) and new clause 1.8.2.5.2. The note that is proposed to be deleted is very ambiguous and the new clause is much clearer.

Decision Sought

- That proposed clause 1.8.2.5.2 is retained as drafted in PC52.

PART 2 – EARTHWORKS AND GEOTECHNICAL REQUIREMENTS

Section 2.5.1 – Plant Pest Management

9. We note that there is a typo in the Section 2.5.1 heading – “Plant” is missing the “t.”
10. Horizons supports the new paragraph in Section 2.5.1 as the reduction in potential for introduction of new weeds through good site biosecurity is consistent with the objectives of our Regional Pest Strategy and the Proposed Combined Pest Management Plan and Strategy 2015-2035, which is nearing completion following public consultation.

Decisions Sought

- That the spelling error in the heading is Section 2.5.1 is corrected from “Plan” to “Plant.”
- That the new paragraph proposed to be added to section 2.5.1 is retained as drafted in PC52.

PART 3 – ROADS

11. For the same reasons outlined in paragraph 10 above, we support proposed section 3.4.1.1.

Decision Sought

- That new paragraph 3.4.1.1 is retained as drafted in PC52.

PART 5 – WASTEWATER

12. Horizons Environmental Scientist, Harold Barnett, reviewed Part 5 (Wastewater) of the WDC Land Development and Subdivision Engineering Document 2012. A copy of his recommended changes was attached as Appendix 1 to Horizons' feedback on the draft Plan Change. These changes were requested to ensure that the standards align with the wastewater standards set out in One Plan Rule 14-14 (new and upgraded discharges of domestic wastewater) and the Manual for Onsite Wastewater Systems Design and Management (Horizons Regional Council, 2010). All of Mr Barnett's recommended changes have been shown as underlining and strikethrough in Sections 5.6.1 and 5.6.2 of the amended version of Part 5 of the Engineering Document. We request that all of Horizons' recommended changes to Part 5 (Wastewater) (refer to underlining and strikethrough) are accepted.

Decision Sought

- That Horizons' recommended changes to Sections 5.6.1 and 5.6.2 in Part 5 of the Engineering Document, shown as underlining and strikethrough, are accepted.

PART 6 – WATER SUPPLY

13. The One Plan contains rules which set the permitted activity limits for surface water and ground water takes (Rules 16-1 and 16-2). We understand that Part 6 of the Standard primarily manages new connections to the reticulated water supply. However, new clause 6.6 refers to rural settlements and areas on restricted water supply. Properties in these areas are required to have 24 hours on-site storage. Based on the water storage volumes required for domestic purposes in clause 6.7, it is likely that water takes for storage will be within permitted activity limits. However, in our feedback on the draft version of the Plan Change we suggested the inclusion of an advice note that refers plan users to Horizons Regional Council for advice on water takes and any conditions that may apply.
14. We note that our recommended advice note has been included in the amended version of Part 6 of the Engineering Document (refer to Section 6.6). We support the inclusion of this advice note and request that it be retained as drafted.

Decision Sought

- That the advice note in Section 6.6 of the amended Engineering Document be retained as drafted in Proposed Plan Change 52.

PART 7 – LANDSCAPE

15. Horizons supports the new paragraph in Section 7.2.4. While we recognise that subdivision landscaping and planting is primarily for the purpose of improving aesthetics, any environmental enhancement that this planting provides is encouraged by Horizons.
16. The proposed paragraph in Section 7.3.5 is supported by Horizons. In particular, we support the reference to the need to consider alternative planting techniques to ensure the integrity of swales, given their importance for stormwater management.

Decisions Sought

- That the new paragraph proposed to be added to section 7.2.4 is retained as drafted in PC52.
- That the new paragraph proposed to be added to section 7.3.4 is retained as drafted in PC52.

APPENDIX I – TECHNICAL SPECIFICATIONS

17. Horizons supports clause b) and c) in Section 1.7 of Appendix I which require the developer to provide details of the management of fuel and hazardous substance storage. Horizons has an interest in the management of such substances to ensure that they are not discharged onto or into land, including where contaminants may enter water or become entrained in stormwater. Any deliberate or accidental discharge of contaminants would require a discharge permit from Horizons, and depending on the nature of the discharge, may be subject to compliance action and remedial requirements.
18. Horizons supports the new paragraph proposed to be added to Section 2.6 of Appendix I (Temporary Drainage and Erosion Control). One Plan Rule 13-1 requires the installation and maintenance of erosion and sediment control measures for any small-scale land disturbance (involving a land area of up to 2,500m² per 12 month period). One Plan Rule 13-2 requires the applicant to submit an erosion and sediment control plan to Horizons as part of a Controlled Activity consent for any large-scale earthworks (exceeding 2,500m² per 12 month period). The proposed requirements in Clause 2.6 of Appendix I are considered to be consistent with Horizons' requirements for small and large-scale land disturbance in One Plan Rules 13-1 and 13-2.

Decisions Sought

- That the proposed addition to Section 1.5 in Appendix I be retained as drafted in PC52.

- That clause b) and c) in Section 1.7 of Appendix I be retained as drafted in PC52.
- That the new paragraph proposed to be added to Section 2.6 of Appendix I be retained as drafted in PC52.

Please feel free to contact me (email Lisa.Thomas@horizons.govt.nz) if you wish to discuss any of the matters raised in this submission.



Lisa Thomas
Coordinator District Advice
HORIZONS REGIONAL COUNCIL

20 May 2016

Leayne Huirua
 Whanganui District Council
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 WHANGANUI 4540

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 2016
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Dear Leayne

BY EMAIL ONLY

leayne.huirua@wanganui.govt.nz

WANGANUI DISTRICT PLAN REVIEW – PROPOSED PLAN CHANGE 54 – ENGINEERING DOCUMENT 2016

Thank you for notifying us of the Whanganui District Council's intention to update Appendix I of the District Plan – Engineering Document 2012.

Horizons supports the intention of this Plan Change, being to update the Engineering Document to ensure consistency with NZS4404:2010 and to remove duplications between the Standard and the Engineering Document. We do not wish to comment on the technical requirements of the Engineering Document, as this largely relates to reticulated services that Horizons does not have any responsibility for. However, the following feedback includes support for those provisions that relate to matters of interest to Horizons, and some suggested changes that we think would be useful for plan users.

PART 1 – GENERAL REQUIREMENTS AND PROCEDURES

1. Horizons supports the deletion of the note that referred to recognised datums (Moturiki 00 + City Datum 100.06 so Moturiki level + City level – 100.06) and new clause 1.8.2.5.2. The note that is proposed to be deleted is very ambiguous and the new clause is much clearer.

PART 2 – EARTHWORKS AND GEOTECHNICAL REQUIREMENTS

Section 2.5.1 – Plant Pest Management

2. We note that there is a typo in the Section 2.5.1 heading – “Plant” is missing the “t.” Horizons supports the new paragraph in Section 2.5.1 as the reduction in potential for introduction of new weeds through good site biosecurity is consistent with the objectives of our Regional Pest Strategy.

Section 2.6.2 – As-built drawings for earthworks and drainage

3. The note at the bottom of section 2.6.2 references district wide aerial photography held by Horizons. This photography dates from 2011, but is being updated in the current year.

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

4. For the same reasons outlined in paragraph 2 above, we support proposed section 3.4.1.1.

Part 5 – Wastewater

5. Horizons Environmental Scientist, Harold Barnett, has reviewed Part 5 (Wastewater). His recommended changes are in red text on the attached document (Appendix 1). These changes are requested to ensure that the standards align with the wastewater standards set out in One Plan Rule 14-14 (new and upgraded discharges of domestic wastewater) and the Manual for Onsite Wastewater Systems Design and Management (Horizons Regional Council, 2010).

Part 6 – Water Supply

6. One Plan Rules 16-1 and 16-2 set the permitted activity limits for surface water and ground water respectively. We understand that this standard primarily manages new connections to the reticulated water supply. However, new clause 6.6 refers to rural settlements and areas on restricted water supply. Properties in these areas are required to have 24 hours on-site storage. Based on the water storage volumes required for domestic purposes in clause 6.7, it is likely that water takes for storage will be within permitted activity limits. However, we suggest the inclusion of an advice note referring plan users to Horizons Regional Council for advice on water takes and any conditions that may apply. Possible wording is as follows:

Note:

Rules 16-1 and 16-2 of Horizons One Plan set out the permitted activity limits and conditions that relate to the take and use of surface water and groundwater. If you have any questions regarding water takes please contact Horizons duty consents planner on Freephone 0508 800 800.

Part 7 – Landscape

7. Horizons supports the new paragraph in Section 7.2.4. While we recognise that subdivision landscaping and planting is primarily being for the purpose of improving aesthetics, any environmental enhancement that this planting provides is encouraged by Horizons.
8. The proposed paragraph in Section 7.3.5 is supported by Horizons. In particular, we support the reference to the need to consider alternative planting techniques to ensure the integrity of swales, given their importance for stormwater management.

APPENDIX I – TECHNICAL SPECIFICATIONS

9. Horizons supports the proposed inclusion of a requirement in clause 1.5 that the construction access be of a condition to ensure that no debris is deposited onto adjacent roads from the site during the construction period.
10. Horizons supports the requirement in clause 1.7 that the developer provide details of the management of fuel and hazardous substance storage. Horizons has an interest in the management of such substances to ensure that they are not discharged onto or into land, including where contaminants may enter water or become entrained in stormwater. Any deliberate or accidental discharge of contaminants would require a discharge permit from Horizons, and depending on the nature of the discharge, may be subject to compliance action and remedial requirements.
11. Horizons supports the new paragraph proposed to be added to clause 2.6 (Temporary Drainage and Erosion Control). Horizons requires the installation and maintenance of erosion and sediment control measures for any small-scale land disturbance (involving a land area of up to 2,500m² per 12 month period – Rule 13-1). Applicants are required to submit an erosion and sediment control plan to Horizons as part of a Controlled Activity consent for any large-scale earthworks (exceeding 2,500m² per 12 month period – Rule 13-2). The proposed requirements in Clause 2.6 of Appendix I are considered to be consistent with Horizons requirements for small and large-scale land disturbance in One Plan Rules 13-1 and 13-2.

Please feel free to contact me (email Lisa.Thomas@horizons.govt.nz) if you wish to discuss any of the matters raised in this letter.

Yours sincerely



Lisa Thomas
COORDINATOR DISTRICT ADVICE

5.6 On-Site Wastewater Disposal System

5.65.1 Process

If on-site treatment and disposal of sewage is necessary in areas where there is no available connection to the WDC sewerage system, then design shall be undertaken as follows, based on an actual assessment of conditions on the site.

The design of an on-site wastewater treatment and disposal system shall be carried out by a suitably qualified and experienced professional, based on a specific assessment of the site conditions and the number of bedrooms in the dwelling (office, rumpus and media rooms count as a bedroom). An assessment report and design must be submitted to the format set out in the accompanying guideline (to be developed). The guide sets out the following:

- factors to be addressed in the site assessment
- information to be provided in support of any building consent application
- example site plan showing proposed building location, levels, and location of treatment and disposal system including any reserve area
- high level information on soils and other site specific constraints for on-site wastewater treatment and disposal in the Wanganui District

For any subdivision for which on-site disposal is proposed, proof of the ability to provide a suitable wastewater system compatible with building consent requirements for each lot shall be submitted. This will be a preliminary design based on field assessment and design to the standards outlined in clause 5.5.2. 5.65.1 Process

If on-site treatment and disposal of sewage is necessary in areas where there is no available connection to the WDC sewerage system, then design shall be undertaken as follows, based on an actual assessment of conditions on the site.

The design of an on-site wastewater treatment and disposal system shall be carried out by a suitably qualified and experienced professional, based on a specific assessment of the site conditions. An assessment report and design must be submitted to the format set out in the accompanying guideline (to be developed). The guide sets out the following:

- factors to be addressed in the site assessment
- information to be provided in support of any building consent application
- example site plan showing proposed building location, levels, and location of treatment and disposal system including any reserve area
- high level information on soils and other site specific constraints for on-site wastewater treatment and disposal in the Wanganui District

For any subdivision for which on-site disposal is proposed, proof of the ability to provide a suitable system compatible with building consent requirements for each lot shall be submitted. This will be a preliminary design based on field assessment and design to the standards outlined in clause 5.5.2. The preliminary design shall provide the following information as part of an overall subdivision plan:

- preliminary design based on household occupancy of at least 5 persons
- location and extent of the wastewater treatment system and disposal area
- location and extent of the required reserve area
- location of any water or drainage courses, water bodies, water sources, high groundwater level and fixtures

Prior to approval under section 224 of the Resource Management Act 1991 the Developer shall submit to, and have approved by WDC, a report by a suitably qualified person acceptable to WDC.

If this assessment determines that secondary treatment of effluent is required for any lots, a Consent Notice shall be placed on the title for that Lot which provides the following:

‘The owner of the Lot, prior to the occupation of any dwelling on the Lot, shall install an on-site secondary treated ~~septic tank~~ wastewater system approved by the Council and certified by a suitably qualified professional person engaged by the owner’.

Note: Horizons One Plan rules require secondary treatment plants with a disposal field comprising subsurface drip line and a wastewater loading rate of no more than 3mm/day.

A final on-site system design must be carried out for the Building Consent once the house and site development is known. This will be the responsibility of the Building Consent applicant, and is to be noted in the design documentation submitted to the WDC.

5.65.2 Requirements for Design Compliance

The design must comply with the following:

- All systems shall comply with the requirements of Horizons Regional Council’s One Plan Land and Water Regional Plan and the rules contained there-in.
- AS/NZS 1546 On-site domestic wastewater treatment units
- AS/NZS 1547 On-site domestic wastewater management

In addition WDC require the following and these requirements shall have precedence over NZS provisions (for septic tanks):

- all dwellings shall install a minimum 4500 l capacity septic tank
- all septic tanks shall be fitted with a proprietary outlet filter to prevent solids carryover to the disposal system
- all sites assessed to have category 1 soils (AS/NZS 1547:2000 - Table 4.2A1 - gravels and sands - free draining) shall be required to provide a pumped dosing system to distribute effluent evenly over the entire disposal system. Traditional gravity trench and beds systems shall not be acceptable.
- all sites assessed as having category 5 or 6 low permeability soils, shall be required to provide an alternative design (secondary treatment plant with land application via subsurface pressure compensating drip line~~to be defined~~) for disposal of wastewater, as traditional gravity trench or bed disposal systems shall not be acceptable.

- all sites with high or fluctuating water tables, or where there is potential for environmental contamination and/or the sites do not meet the conditions set out in Rule DL 2, shall be required to install an advanced on-site wastewater treatment and disposal system.
- A passive reserve area shall be provided on the lot, either adjacent to the disposal area or located downstream of it. Reserve area requirements shall be as follows¹:
 - 100% of the disposal area for septic tank and trenches
 - ~~105~~50% of the disposal area for septic tank and pumped dosed systems
 - ~~5033~~% of the disposal area for advanced wastewater treatment systems

5.65.3 Maintenance and Ownership

On-site systems shall be designated on the plan. Systems are to remain the maintenance responsibility of, and in the ownership of, the property owner/developer.

Note: See wording in HRC One Plan regarding ongoing Council compliance certification for The preliminary design shall provide the following information as part of an overall subdivision plan: