



31 July 2024

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RM240327, RM240328 & RM240329 - Richmond South Low Level Reservoir - Response to Request for Further Information

5-G3445.59

Dear Kate and Saskia,

Thank you for your Request for Further Information letter dated 15 July 2024. Please see our response to your questions below.

Question 1: *The notice of requirement indicates that flexibility is sought to provide for a future pumping station and the designation is for “water supply purposes”. Details of the size and likely location of the pump station are included in plans, but this is not assessed in the Landscape Assessment. Please provide an addendum to the landscape assessment or memorandum which considers any potential landscape effects associated with this pump station, and whether any further mitigation planting, colour restrictions etc are required.*

Answer: If constructed, it is anticipated that the potential future pump station will be located on the front portion of the property, as indicated on the Site Layout plan submitted with the application and included in Figure 1 below. This anticipated location is below the mapped ridgeline, as shown in Figure 2 below, meaning that the pump station could be constructed in this location as a permitted activity under Tasman Resource Management Plan Rule 16.6.2.1 (Network Utilities and Public Works).

Any adverse landscape and visual amenity effects will be less than minor due to:

- The relatively small size of the pump station – The pump station is anticipated to have an approximate footprint of 5m x 3m and, if above ground, a maximum height of 3.5m.
- The location and elevation of the pump station – Based on the contour mapping available on Top of the South Maps, the anticipated pump station location is at an elevation of approximately 55m, and is well below the ridgeline which has an elevation of approximately 63m.
- The proposed vegetation – It is anticipated that the potential future pump station will be able to be partially screened by vegetation. This has been confirmed with our landscape architect, who has provided revised renders showing the potential pump station (Figures 3 and 4 below).

It is also important to note that an Outline Plan will be submitted for the future pump station – if built - prior to its construction. Pursuant to s176A(3), this would show provide details of the pump station, including the landscaping proposed . Given the above, we

do not consider it necessary or appropriate to provide a landscape assessment for the potential pump station at this stage.



Figure 1: Site Layout Plan

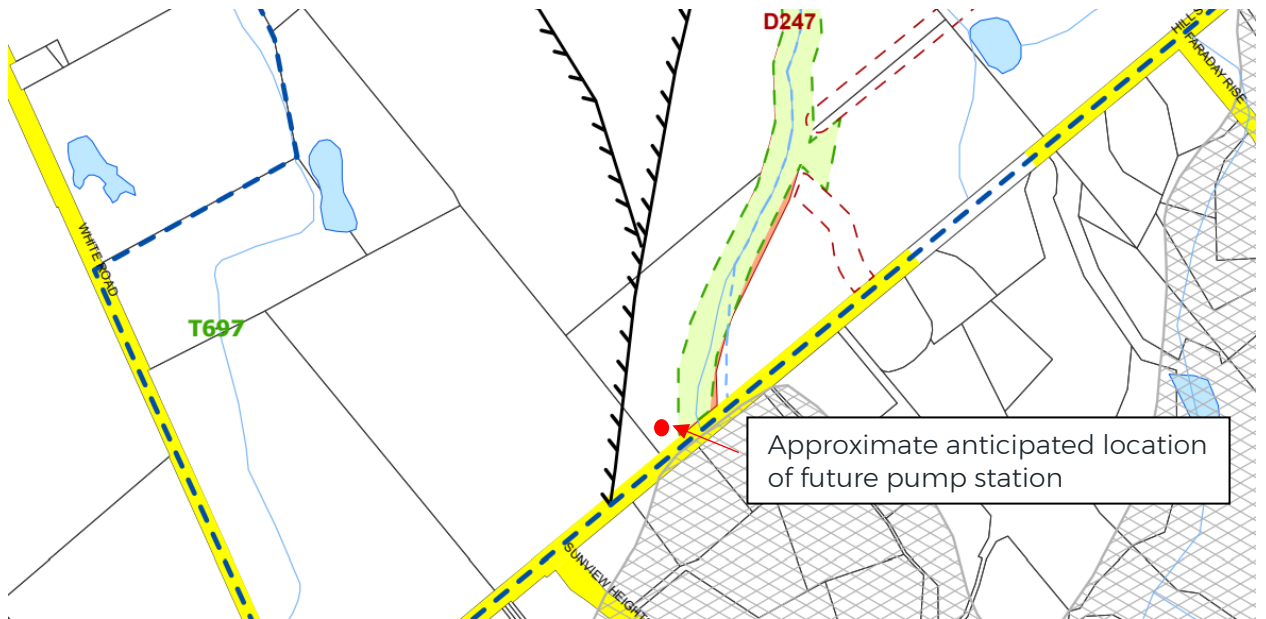


Figure 2: Excerpt from TRMP Area Map 133 showing mapped ridgeline



From Viewpoint 1

Figure 3: Viewpoint 1 Landscape Render with Potential Pump Station Included



From Viewpoint 1

Figure 4: Viewpoint 1 Landscape Render with Potential Pump Station Included and Vegetation Screening

Question 2(a): *The notice of requirement has been made for “water supply purposes”. Details have been provided for the initial public work, which is the water reservoir, however it is indicated that the notice of requirement will likely, in future, include other water supply infrastructure such as a pump station. The proposed conditions relate solely to the construction of initial public work, and do not provide any parameters for future works/structures that may be placed on site under a designation for “water supply purposes” in future (with the exception of operational noise). Please consider whether there are any appropriate conditions which should be applied to the designation to provide some parameters for future works/structures on the site, in particular the future pump station, or consider modifying the proposed conditions to address this matter.*

Answer: We are seeking to designate the site to ensure that the applicant has the required flexibility to construct necessary and important water infrastructure as needed in the future.

We have included details of the water reservoir and associated conditions within the Notice of Requirement to ensure that a separate Outline Plan is not required for this initial public

work (pursuant to RMA s176A(2)(b)). However, details of the potential future pump station are not yet confirmed, meaning that we are unable to volunteer conditions related specifically to this at this stage.

An Outline Plan will be submitted for the pump station prior to its construction. This will provide the opportunity for Council to make recommendations that are specific to the pump station when more detail is known. Given this, we do not consider it necessary or appropriate to volunteer designation conditions related specifically to the pump station.

Question 2(b): *The construction conditions require the development of a Construction Methodology Plan (CMP) to be submitted for certification, however the conditions do not require any details of what is required to be included in this CMP, making enforcement of this condition unworkable. Please consider revising the condition to include a list of requirements for the CMP to enable to Council to certify that the CMP is sufficient.*

Answer: We propose to amend our volunteered CMP condition as follows:

At least 10 working days prior to works commencing on site, a Construction Methodology Plan (CMP) drafted by a suitably qualified person(s) (which may include the lead contractor) shall be prepared and submitted to the Council's Team Leader - Monitoring & Enforcement for certification. The CMP shall include:

- a) Details of the construction methodology, including construction noise management, and timing of the works*
- b) The hours of work at the site*
- c) The roles and responsibilities of key personnel*
- d) A contact (mobile) telephone number(s) for the on-site manager, where contact can be made 24 hours a day/ 7 days a week*
- e) A communication and complaints procedure for adjoining property owners/ occupiers and the public*
- f) A requirement for a pre-construction meeting between the Requiring Authority, the contractor undertaking the works and, should they wish to attend, Council's Monitoring Officer.*

It is noted that a separate condition for an Erosion and Sediment Control Plan has been volunteered and that this could be incorporated into the CMP, if this is your preference.

Question 2(c): *The proposed conditions relating to the notice of requirement require compliance with the relevant TRMP noise limits. Please consider whether it would be more appropriate to stipulate the noise limits specifically in the conditions, because the TRMP may be superseded and the reference to a specific rule may be lost.*

Answer: We recognise that stipulating the specific noise limits will provide clarity and consistency in the event that the TRMP noise limits are amended or superseded in the future. We have considered the following two general possibilities, should the applicable district plan noise rule change:

- The applicable district plan noise rule becomes more onerous – In this case, operational noise should be allowed to continue to occur in accordance with limits that applied at the time of the designation becoming operative as per RMA s10(1)(b). Stipulating the specific noise limits will provide for this.

- The applicable district plan noise rule becomes more permissive – In this case, the noise limits in the designation condition, if stipulated, would be more onerous than what can occur as a permitted activity, which is not best practice. We consider that the designation condition should therefore allow for noise in accordance with any future applicable standard that is more permissive.

Given that above, we would like to amend our volunteered operational noise condition to the following:

~~Operational noise shall comply with the relevant TRMP noise limits detailed in rule 17.5.2.1 e) when measured at or within the notional boundary of any dwelling in a Rural Zone or Rural Residential Zone.~~

Operational noise shall not exceed the more permissive of (a) the relevant TRMP noise limits detailed in TRMP rule 17.5.2.1(c); or (b) any applicable standard which may supersede this.

Advice Note: At the time of this designation being approved, TRMP rule 17.5.2.1(c) requires that noise shall not exceed the following limits when measured at or within the notional boundary of any dwelling in a Rural zone (other than any dwelling on the site from which the noise is being generated), Rural Residential, Papakainga or Tourist Services zone, or at or within any site within a Residential Zone:

	<u>Day</u>	<u>Night</u>
<u>L_{eq}</u>	<u>55 dBA</u>	<u>40 dBA</u>
<u>L_{max}</u>		<u>70 dBA</u>

Question 2(d): *The proposed conditions require a surface treatment for the reservoir to reduce the reflectivity of the concrete. Please consider revising this condition to include a specific oxidation/colouration (note Figure 4 shows 'Permeon' colouration/oxidation applied to another tank and appears to be the basis for assessment), as well as including the landscape assessment recommendation to paint the balustrade Colorsteel 'Grey Friars'.*

Answer: We have revised our volunteered condition to specify the colours used in the landscape assessment. Note however that we would also like the condition to make an allowance for alternative colours to be used with the prior agreement of Council. This avoids frustrations in the event that the specified colours are unavailable in the future. Our proposed approach and amended wording are in keeping with Council's standard building colour condition.

Our revised condition is as follows:

~~The exterior of the reservoir shall have a surface treatment (colouration/oxidation process) applied to reduce the reflectivity of new concrete.~~

The exterior of the reservoir and the balustrade shall be finished in the following colours, or alternative colours approved by Council's Consents Planner, Richmond:

<u>Structure</u>	<u>Finish Material</u>	<u>Colour</u>
<u>Water reservoir</u>	<u>Concrete with surface treatment to reduce reflectivity</u>	<u>'Permeon' colouration/oxidation</u>
<u>Balustrade</u>	<u>Colorsteel</u>	<u>Grey Friars</u>

Where an alternative colour is used, the Requiring Authority shall submit details of the finish material, manufacturer, colour, and reflectance value (for paint finish) to Council's Consents Planner, Richmond for prior approval.

Question 3: *Please clarify why the commissioning being carried out in part 3 of Section 3.5.2 is not being dechlorinated prior to being discharged? Why is the water being discharged to the sewer rather than to Upper Borck Creek during this stage of the commissioning?*

Answer: All water from cleaning operations will be dechlorinated, however, is deemed to be Tradewaste and will therefore be discharged to the sewer.

Question 4: *I note that a Cultural Health Indicator program was identified by iwi during early consultation. Please clarify whether this program will be carried out or has already been carried out?*

Answer: A Cultural Health Indicator program has not yet been developed or implemented. The Requiring Authority is currently working with iwi to provide the opportunity for Cultural Health Indicator monitoring to be undertaken prior to any discharge from the new water reservoir to the river, in conjunction with TDC's other work programs within this stormwater catchment (e.g. the Richmond South greenway programme).

The following designation condition is volunteered:

The Requiring Authority shall provide the opportunity for Te Tau Ihu iwi to undertake Cultural Health Indicator (CHI) monitoring prior to any discharge from the new water reservoir to the river. Should iwi choose to take up this opportunity, the recommendations from the CHI monitoring shall be taken into account where this is possible and practicable. All costs of this monitoring shall be met by the Consent Holder.

Note: For the avoidance of doubt, the Requiring Authority is not required to cover the costs of any more than one Cultural Health Indicator monitoring assessment for the site.

Question 5: *Please clarify whether planned discharges will occur during high rainfall events. Alternatively, please confirm whether the applicant has proposed any mitigation to reduce the impact of the planned discharges during high rainfall events.*

Answer: The weather forecast will be considered when scheduling planned discharges to reduce the likelihood of a planned discharge coinciding with a heavy rainfall event. In the event that a planned discharge coincides with an unforeseen heavy rainfall event, the discharge will be able to be postponed if needed. We volunteer the following condition to this effect:

The Requiring Authority shall ensure that planned discharges from the water reservoir do not take place during heavy rainfall events.

Question 6: *Please confirm whether the culvert located immediately downstream of the site will be sized appropriately for up to 40 L/s plus any residual flow in Upper Borck Creek.*

Answer: The system downstream is currently sized for a Q10 level of service, which exceeds the demand from our planning commissioning activities. In other words, the downstream culvert can accommodate the 40 L/s plus residual flow.

Question 7: *Please confirm what measures (if any) will be implemented during an emergency overflow to reduce the risk of chlorinated water being discharged directly to Upper Borck Creek. A Tasman District Council Ecologist has identified that constructing a holding tank and a grassy swale to contain the spill would reduce potential impact on Upper Borck Creek.*

Answer: The pump control system will limit reservoir filling to operational levels preventing overflow to Borck Creek. The likelihood of an emergency overflow is an extremely rare event, in such an event, any water would be directed to Borck creek via a vegetated and erosion protected swale before entering the stream channel.

I trust that this letter your questions, however, please let me know if you have any further questions or comments.

Regards


Susi B. Solly
Senior Planner