

**Memorandum****To: Venessa Anich (Lands & Survey)****From: Michael Day, KDC Strategy, Policy and Governance Manager****Date: 16/03/22****Subject: Dargaville Racing Club Inc, Private Plan Change – Further Information request, pursuant to Clause 23 of Schedule 1, RMA**

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Kia ora Venessa

Thank you for lodging a request for a Private Plan Change on behalf of the Dargaville Racing Club Inc. This request was received by Kaipara District Council (Council) on 22/02/22.

Pursuant to Clause 23(1) of Schedule 1, RMA, Council has been assessing the request to determine if we require further information to enable us to better understand the potential adverse effects on the environment, the ways in which any adverse effects may be mitigated and the nature of any consultation undertaken or required to be undertaken.

I can now confirm that Council requests the following further information:

**1.1 Wastewater Disposal:**

It is noted at Appendix E to Appendix 4 (Civil Engineering Assessment) that discussions with the Maintenance Contractor indicate that:

*“..Wastewater process design rate 10ha conventional pond treatment (Primary/tertiary ponds) just domestic loading at 84kg BOD could process a population of 12000. We have industrial loading and the process will require an upgrade to achieve this, e.g.. screening, primary or activated sludge process...”*

While the maintenance operator indicates the Dargaville Wastewater Treatment Plant (WWTP) will require an upgrade, it is considered that a detailed assessment of the existing capacity of the WWTP and capability to accept the additional load generated by the proposed development is required.

**Further Information**

A detailed assessment of the existing capacity of the Dargaville WWTP and capability to accept the additional load generated by the proposed development is required.

**1.2 Wastewater Network:**

The construction of a rising main from the site to the wastewater treatment plant would require the proposed pipeline to be constructed in the public road reserve where available, and across private property where insufficient reserve space is available.”

### Further Information

Further information is required in relation to the potential number of affected private property by the construction of the proposed rising main. This request is to evaluate the feasibility of the proposal in light of ongoing future maintenance and potential additional cost due to land acquisition, easement and/or potential landowner compensation.

The above should be answered in light of the proposed bridge crossing and/or any other potential alternative route. Refer to further clarification below:

*“ ii) A crossing over Awakino River on State Highway 14 (entering Dargaville) would also be required. The bridge across the river currently hosts several services such as water, electrical cables, and comms as shown in figure 11. Specific approval for the crossing would be required from NZTA. It is recommended that this requirement be addressed together with access connections between Dargaville and the development...”*

There is no alternative way to connect the proposed development to the WWTP other than a crossing over/under the river.

Further information is required to establish if:

- The crossing over the existing bridge is actually feasible.
- If not, what would be the alternative available proposal to connect the development to the WWTP.

*“iii) A connection to Council’s “Pump Station 14” may also be possible, **subject to capacity, saving the construction of approximately 420m of the 3km rising main...**”*

Further information is required to establish:

- Capacity of the pumpstation should be undertaken to confirm potential for the saving.
- Alternatively, indicate the potential alternative route and impacts (in line with the above requested clarification).

## 2.1 Stormwater Management:

The following from the stormwater report is noted:

*“i) A review of the geology of the site and characteristics of the area, it is discovered that the permeability rate of the underlain soils is considered very low and negligible.*

***The site appears to be generally waterlogged.***

- *The groundwater table is ranging from 1.5m to 3.5m.*
- *Figure 101: Overland Flow Paths (Source: KDC Utility Services Maps)*

While the report focused on the detention/quantity management, no information is provided regarding:

- overland flow path risk and criticality. For example, is there any issue with a low-lying area, high groundwater table and adjacent risk of flooding? How this can be managed?
- clear identification of potential areas dedicated to stormwater flow management like swale corridors or low-lying areas

### Further information

Further information is required on stormwater flow management including as a minimum:

- High level stormwater flow management approach
- High level map indicating the planned major overland flow corridors.
- Potential interlink with the proposed detention system (see below)

Additionally, it is noted that:

*“ii) The deterministic model results indicate that 3 detention ponds totaling **11,884m<sup>3</sup>** storage is required for the respective sub catchments to ensure the post development discharge from the development is limited to the current pre-developed discharge.”*

- *The storage volume quoted above is based on storage device (pond) with a storage depth of approximately **1.2m** deep.”*

Thus, at high level this translate in an area of approx. 1,000m<sup>2</sup>. On *Figure 2b: The Proposal - Racecourse Masterplan of the Dargaville Racing Club Redevelopment - Landscape Assessment* the only visible detention pond is located on the northeast side of the proposed development.

This appears to be smaller than required and possibly not in line with the existing overland flow path, currently being on the north-east corner of the development.



### **Further Information**

In line with the above clarification, further information is required on stormwater flow management and use of detention systems.

### 3.1 Water Treatment Plant Capacity

It is noted at Section 4.3.2 – Water Treatment Plan Capacity:

- *Feedback from Council’s maintenance contractor stated that Council’s “Potable water plant (settling/rapid sand filtration) design flow rate at 210 m<sup>3</sup>/hr, **will require consent renewals and favourable seasonal conditions to achieve this.***
- *The above result indicates that a total of 147.21 m<sup>3</sup>/hr must be produced by the plant to serve the network, with the proposed development included. **This theoretical demand is within the production design capacity communicated by Council’s contractor, however processing enhancements may be required to increase the production from the current 120-130m<sup>3</sup> per hour, as reported.***

As per the above wastewater consideration, the email with the maintenance operator can be considered only as a preliminary conversation rather than a detailed and robust assessment, given the importance of the proposal. Thus, no detailed assessment is available in relation to the ability of the existing Water Treatment Plant (WTP) of:

- accepting the additional load generated by the proposed development.
  - In positive case, what would be the spare capacity left at the WTP for future development across the Dargaville
  - In negative case, what upgrade the WTP would require to accept this proposed development and future growth.
- Impact on the current raw water supply in term of:
  - Additional raw water required for the proposed development;
  - Spare capacity for other future development;
  - Raw water distribution potential upgrade.

### 3.2 Further Information

A detailed assessment of the existing capacity of the WTP and capability to accept the additional load generated by the proposed development is required, including consideration on the following in relation to the ability of the existing Water Treatment Plant (WTP) of:

- accepting the additional load generated by the proposed development.
  - In positive case, what would be the spare capacity left at the WTP for future development across the Dargaville
  - In negative case, what upgrade the WTP would require to accept this proposed development and future growth.
- Impact on the current raw water supply in term of:
  - Additional raw water required for the proposed development;

- Spare capacity for other future development;
- Raw water distribution potential upgrade.

#### 4.1 Open Spaces

When looking at what new parks to vest, KDC would normally be guided by the direction in the Strategic Asset Management Plan, Spatial Plan, District Plan etc. However, this development is not envisaged by any of these documents. It is essentially a bubble of urban area in the rural area near Dargaville with no linkages to the rest of the urban parks and reserves network. It also does not adjoin a river, the coast or other area of natural amenity. Therefore, KDC may conclude that this development must meet its own needs for parks and recreation.

Except for some stormwater management areas, the development is proposing that the whole of the site's open space needs would be met by the hillside in the northeast corner. While this would offer views over the development, its steep nature would make it inappropriate for some forms of play, particularly involving balls. It's noncentral location also makes it less walkable for some residents. It does however allow the developer to make the most economical use of the land as this area would require the most earthworks to develop into housing.

Finally, the development appears short on lakes for stormwater attenuation. KDC would like to know whether the applicant has considered an alternative approach, such as creating a stormwater pond in the middle of the development, with a walking track and amenities around it (like Lakeside Drive in Orewa). This could give better walking access to all residents. A rough concept is shown here:



#### 4.2 Further Information

Further information is required in relation to the best practice approach and success factors for the planning, development and management of open space within the proposed development.

## **5.1 Planning:**

This application is lodged in terms of the Operative District Plan and falls outside of the Proposed development area of Dargaville

Whilst the requirements of s32(3)(b) are noted, it is considered that a more rigorous assessment of the Objectives of Chapter 3 of the Operative DP are still will required with specific reference to:

### **Objectives**

3.4.2 To minimise the ad hoc expansion of residential and business activities in the rural heartland, where such activities have the potential to give rise to adverse environmental effects and issues of reverse sensitivity

3.4.3 To restrict growth of residential and business activities in inappropriate locations where such activities have the potential to give rise to adverse effects on sensitive receiving environments.

3.4.4 To ensure emissions, discharges and effects of residential and business development are managed so that adverse effects on the surrounding environment, including existing settlement areas, are comprehensively addressed.

3.4.5 To provide appropriate infrastructure and servicing in advance of or alongside future residential and business development.

3.4.8 To provide adequate areas to accommodate future residential development which maximise the use of existing infrastructure.

### **Further information**

A more robust assessment of the Objectives outlined above is requested.

## **6.1 Mana Whenua:**

Dargaville Racecourse Private Plan Change

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Te Roroa are recognised as Mana Whenua in this area and it is necessary that the application has to take into account the Te Roroa Iwi Environmental Policy Document. Council requests that you to provide an assessment of the application as to how this Iwi Policy document has been taken into account.

Te Roroa are of the opinion that they, as the Tangata Whenua holding Mana Whenua status, have not been duly consulted and that matters ascribed to them are not fully substantiated.

Te Roroa have concerns with the Cultural Impact Assessment and certain statements that are not correctly recorded, such as the wishes of Parore/Te Kuihi whanaunga in gifting the land.

As per the Mana Enhancing Arrangement that Council has with Te Roroa, Council staff forwarded the private plan change application and supporting documents to Te Roroa. Council strongly suggests that the applicant/s undertake appropriate consultation with Te Roroa so that this information can be included in the further/additional information that is returned to Council following this request.

Nga mihi

**Michael Day**