

Fast-track Approvals Act 2024 – Delmore Substantive Application
Technical Addendum
FTAA-2502-1015 / BUN60444768

1.0 Technical Specialist – Stormwater Specialist

From: Martin Meyer

Date: 21st July 2025

2.0 Executive Summary / Principal Issues

Prior to the acceptance of the SMP by Healthy Waters and/or appropriate zoning to allow for discharge via the regionwide NDC, the proposal will need to be authorised by a private discharge consent. The proposed conditions do not ensure the maintenance and operation of the proposed stormwater discharge network prior to the vesting to council (at an unknown future date).

Geomorphic assessment of the catchment reach has not been undertaken, and therefore the risk to the river banks, and potentially future lots and homes is not adequately addressed.

3.0 Specialist Assessment – Previous Memo / Comments Overview

Summary of 25/06 Issues identified

- Conditions required on the operation and maintenance of stormwater network while it remains private.
- Unknown hydrological conditions of the 34 natural inland wetlands and the effects of the development on these have not been provided.
- Geomorphic assessment has not been provided to determine the capacity for the stream to cope with changes in hydrology by the proposed development.

4.0 Specialist Assessment – Material Reviewed

Review of 07/07 Updates

- *Proposed Conditions*
- *Erosion and Geomorphology Response Memo*
- *Healthy Waters Response*

- Updated AEE
- WW&LA Hydrology MemoUpdated Culvert and Wetland Removal Plans
- Response to Remaining Ecology Queries
- Culvert and Hydrological Suitability Memo
- Updated Draft SMP
- Updated Stormwater Report
- Updated Stormwater Plans (Stage 2AB and Stage 2CDE)

5.0 Specialist Assessment – Addendum – Outstanding Issues / Information Gaps

At the time of writing this Memo, and having reviewed the 7 July updates from the Applicant, I have identified the following outstanding information gaps:

Outstanding

The key outstanding issues are as follows:

- Geomorphic assessment of the streams and/or significant flow paths. Geomorphic assessment is required to ascertain the capacity of the receiving environment to cope with the changes in hydrological regime proposed. Without this assessment it is unclear how the streams and flow paths will adjust over time to the changes in hydrology, and may involve significant incisement and/or erosion and/or damage to land.
- It remains unclear the effects of the hydrological changes on some of the wetlands within the proposal (noting wetland offsets proposed have improved hydrological information provided).
- T-bar erosion issues, the applicant has provided a geomorphic response memo, and states that earth walls will provide sufficient mitigation and protection from t-bar maintenance issues in the future. A private condition on the operation and maintenance of private t-bars and assessment of the slopes and risk of failure should be provided.

Information gap (existing)	Nature of deficiency	Decision-making impact	Risk / uncertainty created
1. Geomorphic assessment of the streams and/or significant flow paths.	<i>The geomorphic nature of the streams and flowpaths within the site, susceptibility to erosion and geomorphic change especially by changes to hydrology and sediment flows in the environment.</i>	<i>Cannot assess the erosion risks</i>	<i>Potential for incisement, stream bank failure, high sediment discharges, significant sudden changes to hydrology</i>
2. Hydrological assessment of wetlands	<i>It is unclear whether the wetlands will maintain there status from the changes in the hydrology of the site. Significant areas will</i>	<i>Unknown effect on the wetlands hydrological function</i>	<i>Risk of species die off, reduction in wetland size and/or viability</i>

	<i>become impervious and pipe their flows to the stream, overland flow that may have previously taken place will reduce.</i>		<i>(refer to ecological memo)</i>
3. T-bar outlets for lots located next to streams have not been assessed for erosion to the stream bank.	Geomorphic assessment (per information gap 1.) would provide assessment on the stream banks ability to cope with a t-bar outlet on these steep sites. Of particular note is the risk in future if these t-bars become clogged and are not maintained correctly.	Unknown erosion risk	Risk of stream bank erosion, sudden discharge of sediment, destruction of stormwater assets

6.0 Proposed Conditions	
6.0 Stormwater Discharge Permit	Commentary
# 225, 226, 227, 228, 229 and 230	Accepted
<p>X.1 'Stormwater Management Works'</p> <p>Note this is a description of the stormwater management works table recommended: Specify each treatment device, outfalls, raingardens propose should be included within the private discharge consent, this should include the catchment area impervious proposed for each device, and the design requirements of these devices (eg GD01). It is recommended this table could also display the assets to remain private and those which aim to be vested in the future.</p>	<p>A stormwater management works table clearly outlines the devices used and authorised by the private discharge consent, this allows environmental monitoring clear guidance of the devices and their sizing and treatment specific to particular catchments or landuse.</p>
<p><u>X.2 An Operation and Maintenance Plan must be provided to and certified by the council 5 working days prior to the commencement of discharge authorised by this consent.</u></p> <p><u>The plan must include</u></p> <ol style="list-style-type: none"> <u>Details of who will hold responsibility for long-term maintenance of the stormwater management system and the organisational structure which will support this process;</u> <u>A programme for regular maintenance and inspection of the stormwater management system;</u> <u>A programme for the collection and disposal of debris and sediment collected by the stormwater management devices or practices;</u> 	<p>The operation and maintenance plan is the proposed conditions (Condition 228.) is for vested assets.</p> <p>The private stormwater discharge consent may authorise the devices used up to the length of the consent (35 years), where assets are not</p>

<p>d. <u>A programme for post-storm inspection and maintenance;</u></p> <p>e. <u>A programme for inspection and maintenance for the outfalls</u></p> <p>f. <u>General inspection checklists for all aspects of the stormwater management system, including visual checks;</u></p> <p>g. <u>A programme for inspection and maintenance of vegetation associated with the stormwater management devices.</u></p>	<p>vested. These still require an operation and maintenance plan.</p> <p>The following conditions are standard to allow for amendment, collection of maintenance records etc.</p>
<p><u>X.3 'Operation and Maintenance Plan implementation'</u></p> <p><u>The stormwater management system must be managed in accordance with the final Operation and Maintenance Plan prepared in accordance with Condition X.2.</u></p>	
<p><u>X.4 'Amendments to the Operation and Maintenance Plan'</u></p> <p><u>Any amendments alterations to the Operation and Maintenance Plan must be submitted to the the council for confirmation, in writing prior to implementation.</u></p> <p><u>The Operation and Maintenance Plan must be updated and submitted upon request to the council for confirmation.</u></p>	
<p><u>X.5 'Maintenance Record'</u></p> <p><u>Details of all Maintenance Records (including inspections, servicing and maintenance) for the stormwater management system must be retained by the</u></p> <p><u>consent holder for a minimum of the preceding three years.</u></p> <p><u>A maintenance record must be provided to the council on request.</u></p>	
<p><u>X.6 'Contents of maintenance record'</u></p> <p>a. <u>Details of any maintenance undertaken; and</u></p> <p>b. <u>Details of any inspections, servicing and maintenance completed</u></p>	
<p><u>X.7 'Maintenance Responsibility'</u></p> <p><u>At the time of issue of the Certificates of Title for the units, a Covenant or other legal instrument to the satisfaction of the Council shall be registered on the titles of the units requiring that the long-term operation and maintenance of the stormwater management devices will remain the joint responsibility of the owner of the units.</u></p>	<p>Assets that have join responsibility of multiple lots will require a body corporate or similar legal entity to manage</p>

<p><u>Advice Note:</u></p> <p>If a Body Corporate or similar legal entity is formed with responsibility for the ongoing operation and maintenance of the stormwater management system, consent DISXXXXXXX (final number to be inserted by planner) for the diversion and discharge of stormwater should be transferred to this entity as outlined in condition X.9.</p>	<p>the responsibility of maintenance.</p>
<p><u>X.8 ‘Maintenance Responsibility’</u></p> <p>At the time of issue of the Certificates of Title for Lots (to be specified), a Covenant or other legal instrument to the satisfaction of the Council shall be registered on the titles of Lots (to be specified), requiring that on-site stormwater management works shall be undertaken to comply with the following:</p> <p>a) The stormwater management devices on each of the individual lots, are to be maintained by the owners of the lots in accordance with the Operation and Maintenance Plan as outlined in Condition 2 (final number to be inserted by lead planner) above [to be attached, prepared in accordance with Auckland Council Consent DISXXXXXXX (final number to be inserted by planner)].</p>	<p>Lot owners should be aware of specific stormwater assets they the responsibility of maintenance (eg tanks)</p>
<p><u>X.9 ‘Future Ownership’</u></p> <p>At the time of issue of a Body Corporate, Resident’s Association, A Covenant, or other legal instrument to the satisfaction of the council, the following registration must be made requiring:</p> <p>a. The stormwater management systems are to be maintained in accordance with the Operation and Maintenance Plan as outlined in condition 2.</p> <p>The Consent Holder must notify the council in writing within 20 working days of the legal entity having been formed.</p>	

7.0 Recommendation

At this stage this proposal is not recommended for approval. The current stormwater management regime does not adequately assess potential effects to downstream flooding. Where downstream tertiary assets are proposed for use, these are not confirmed to have adequate capacity.