

Appendix 4 - Memo from Mr Kemp on Stormwater Management

BEFORE THE

TIMARU DISTRICT COUNCIL HEARING COMMITTEE

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of the Proposed Timaru District Plan

STATEMENT OF EVIDENCE BY KEVIN THOMAS KEMP

Introduction

- 1 My name is Kevin Kemp. I hold qualifications of a Masters of Applied Geography in Resource and Environmental Studies from Texas State University – San Marcos and am currently studying towards a New Zealand Diploma in Civil Engineering from the New Zealand Institute of Highway Technology.
- 2 I am currently the Stormwater Team Leader at Timaru District Council (TDC). Prior to my current role I have held the roles of Infrastructure Planner and Subdivision and Compliance Officer at TDC. I have provided technical assistance on behalf of the Infrastructure Group at TDC to Mr Andrew Willis in his role as a s42A author as it relates to addressing submissions on the Energy and Infrastructure and Drinking Water Protection Chapters of the Proposed Timaru District Plan (PDP).
- 3 I confirm I have read the Code of Conduct for expert witnesses contained in the Environment Court New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of

expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

WSP Suggested Amendments in Response to Submissions

- 4 I have been asked by Mr Willis to provide comment on the technical evidence provided by WSP in response to the submissions received on the provisions of the PDP. I support the recommendations of WSP except for the suggested change to SW-S4 as outlined on page 20 and 21 of their evidence. Specifically, I do not support the proposed threshold area increasing to 500m².
- 5 TDC is actively seeking stormwater consents from Environment Canterbury, with the management of the wider urban networks needing to be completed in a manner that meets the consent conditions imposed. This requires Council to take a network wide approach to managing the impacts of stormwater discharge from individual sites, and Council has taken the approach of including provisions in the PDP.
- 6 The suggested increase in SW-4 to 500m² will mean that Council would be unable to capture hardstand increases that would be associated with many in-fill type developments in urban centres throughout the district. My experience is that infill developments throughout the district can be a driver for increased contaminant loading entering the network.
- 7 I would be comfortable with the area threshold increasing from the 30m² notified to 150m² as this would still allow for some development to occur for the likes of increased on-site carparking spaces or the installation of a new driveway and garage. This threshold would however capture site redevelopments that seek to achieve infill, which in my experience comes with additional vehicle movements and associated risks due to the increased number of households. My view is that when this threshold is reached there needs to be a mechanism to manage the associated impacts of the stormwater discharges from the site.
- 8 The stormwater discharge consents recently granted and currently in processing with Environment Canterbury includes Objectives within our Stormwater Management Plans to progressively reverse diminished ecosystem health of receiving water bodies and freshwater ecosystems.
- 9 In my experience, the targets set in the Stormwater Management Plans to achieve the objectives are best achieved where Council has an opportunity to ensure that non-point source pollutants from development are captured at the source rather than implementing global treatment systems within Council's stormwater infrastructure.
- 10 The direction pursued of a 150m² threshold aligns with the threshold set by Christchurch City Council's *On-Site Stormwater Management Guidelines (CCC OSSMG)*.

- 11 The CCC OSSMG set the 150m² threshold following an assessment of a condition from CRC090292, requiring treatment of car parking areas “with spaces for more than 10 cars.”
- 12 The threshold was then established where the development or re-development of a site increased the hardstand/impervious area by 150m² for 50% or more of the existing hardstand area.

Summary

- 13 Based on my experience and the direction set by Christchurch City, a threshold of 150m² to trigger the implementation of stormwater quality management under SW-S4 is a practical approach to ensure TDC can achieve the Objectives and Targets of our Stormwater Management Plans, without the need to implement significant capital investment on global treatment systems within Council’s stormwater infrastructure network.



Kevin Kemp

28 November 2024