

From: **Matthew Lillis** <Matthew.Lillis@hcc.govt.nz>  
Date: Thu, Dec 24, 2020 at 2:53 PM  
Subject: Mangakootukutuku ICMP Feedback - Response  
To: mangacare@gmail.com <mangacare@gmail.com>

Kia ora Kevin

Thanks very much for your detailed feedback on the Mangakootukutuku ICMP. Please see responses below.

### **High level comments**

**Point 1** - Emphasis on ecological outcomes in table 1 has been increased including habitat, hydrology and connectivity. Note that ecological objectives are given effect to throughout the ICMP document.

**Point 2** – The NPSFM (2020) came into effect at the end of the three year ICMP development process. A future action has been added to carry out a gap analysis of the ICMP against the NPSFM (2020).

A biodiversity offsetting framework is under development as a future action as part of the structure plan review project.

**Point 3** - The ICMP team carried out extensive MUSIC water quality modelling and compared MUSIC results against available event mean concentration data for two urbanised catchments in Hamilton, and monitored data in the Mangakootukutuku stream, in order to satisfy the WRC resource use directorate that the modelling was robust and reasonably reflective of actual conditions. Additional text on this has been added to section It was concluded that the benefits of providing an additional phase of treatment for roads from a water quality perspective has marginal benefit. Nevertheless, this is still currently required under the ICMP to provide quality treatment prior to retention of stormwater to ground. Further discussion between WRC and Hamilton City Council is required to determine whether additional retention on lot can be used to offset retention on roads.

In addition, the ICMP requires 10mm of stormwater to be retained to ground on-lot as a minimum in most of Peacocke (Tiireke sub-catchment), but does not allow downstream devices to be subsequently reduced in size to account for the additional storage, in order to provide a precautionary approach. Offsetting of any residual water quality effects is also required, as current limits of stormwater technology preclude complete removal of contaminants (even with multiple phases of stormwater treatment) and further research into strategic contaminant reduction and reducing contaminant generation at source has been put forward as part of the ICMP programme of works.

While TSS was not assessed in the same detail as other contaminants, subsequent assessment outside the ICMP indicated the ICMP treatment mechanisms would remove approximately 86% of suspended sediment in the developed condition, which represents a 77% reduction from the current condition.

**Point 4a** - This point is noted as a known issue with offset mitigation planting, but resolving it sits outside of the ICMP, and is the result of how the RMA is structured. I have passed the feedback on to planners at Council to address.

**Point 4b** – A biodiversity offsetting strategy is under development as part of the Peacocke Programme. The Hamilton City Council City Planning unit should be approached with questions on it.

**Point 5** - I have passed this on to the correct teams at Council to address.

**Point 6** - I have passed on a request to NIWA to provide access to MURB data to the Streamcare Group.

### **Detailed Comments**

We have reviewed your detailed comments and incorporated them into the ICMP where appropriate. Some are specifically addressed below.

- Construction stormwater management is generally managed outside the ICMP framework, and is subject to WRC guidance and individual consents.
- Compaction effects during development and remediation are addressed in the ICMP and Waikato Regional Stormwater Management Guideline. Catchpit filters are related to citywide policy and have not been addressed in the ICMP.
- Adaptive monitoring and follow-up actions are defined in the SREMP. For more information on the SREMP, speak with the City Waters Compliance Team.
- Perennial is defined by the Waikato Regional Plan section 3.6.3, and has been determined by Morphem through a site walkover. Classifications may be subject to refinement at the resource consenting phase.
- Work is currently underway outside the ICMP as part of the Peacocke Structure Plan Change process to define SNAs.
- Stormwater treatment wetlands are generally not used to provide aquatic habitat, as their function is to detain and remove contaminants which are harmful ecology. Ecological wetlands should provide aquatic habitat.
- The trigger values used in the ICMP are acute limits, and these are more appropriate to be compared against the continuous MUSIC simulation and patterns of contaminant load typical of stormwater than chronic limits.
- Sections of stream have been excluded from the esplanade assessment where the assessment considered they would not be triggered by the rule.
- Watercourse resilience refers to any works to stabilise the stream. Detail of those projects are in the Watercourse Assessment Report, which include measures such as toe protection, grade control, and restoration planting for stability.
- Maintenance of raingardens and wetlands is funded through Council operational budgets.

Please note today is my last day at Hamilton City Council. Please address further correspondence to [city.development@hcc.govt.nz](mailto:city.development@hcc.govt.nz)

Regards

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