

Trent Sunich for QLDC – Hearing Stream 15 – Earthworks

1. My evidence relates to technical and environmental management aspects associated with proposed Chapter 25 Earthworks.
2. I consider that Chapter 25 provides an appropriate standalone chapter for the management earthwork activities, and that it properly recognises the unique set of effects from earthworks that need to be managed and that earthworks are an activity that can occur independently of other activities that may require resource consent.
3. Permitted activity earthwork volume thresholds should be set at a level which can reasonably be expected to accommodate most building or land use activities within respective zones without requiring a resource consent. I consider that the PDP earthwork volume thresholds reflect appropriate levels for the respective PDP zones. In relation to this issue, and in response to rebuttal evidence on behalf of the Millbrook Country Club, I have recommended an increase to the permitted activity volume threshold from 300m³ to 500m³ for the Millbrook Resort Zone, as documented in the rebuttal evidence of Mr Wyeth. I acknowledge that mixed land use occurs across the Millbrook development, including that proposed for the Village activity area (visitor accommodation, commercial activities) and Resort Services activity area (service and maintenance activities to support the resort). The PDP rule framework stipulating a volume threshold of 300m³ which better aligns with residential activities. Given the presence of mixed land use activities which are not always residential, I consider it appropriate to increase the maximum volume threshold to 500m³ for Millbrook Resort Zone, which aligns with the various town centre and mixed use zones listed in 25.5.5 of Table 25.2.
4. My evidence considers the new set of earthworks area thresholds proposed by Rule 25.5.11. I consider that the new area thresholds are appropriate in terms of setting the scale of earthworks that can be undertaken as a permitted activity, relative to the erosion and sediment runoff risks and the current earthwork practice in the district to mitigate those risks.
5. The PDP introduces a sediment standard (25.5.12) and several submissions challenge the ability of practitioners to comply with the notified standard because it centres on the use of the word 'prevent' in relation to sediment entering waterbodies, stormwater networks or going across the boundary of a site. I note that it is not possible to remove all sediment from the water column, as diminishing returns are observed in terms of cost and practicality relative to the marginal benefit in sediment removal efficiency of erosion and sediment control practices. My Wyeth has recommended a consequential change in his s42A report to this standard and I agree with this recommendation.
6. In relation to earthworks activities undertaken near water bodies (relevant to Standard 25.5.20), I agree that earthworks activities should be managed within the setback area. As notified, Standard 25.5.20 may unnecessarily result in minor activities being captured in a resource consent process based on the appropriately broad definition of earthworks which includes any disturbance of land. As a result, I have recommended a maximum permitted activity volume threshold of 5m³ so that minor activities will not be captured by the consenting requirement.