

Before the Commissioner appointed by
the Selwyn District Council

Under the Resource Management Act 1991

In the matter of

Resource consent application for Foodstuffs (South Island)
Properties Limited to establish and operate a PAK'nSAVE
supermarket and associated access, loading, car parking,
signage, earthworks and landscaping at 157 Levi Road,
Rolleston (RC216016)

Statement of evidence of Fiona Anne Ambury

18 July 2022

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**anderson
lloyd.**

Qualifications and experience

- 1 My full name is Fiona Anne Ambury. I am a consulting engineer and Director of Whiterock Consulting Ltd. I hold a Bachelor of Engineering (Natural Resources) and I am a Chartered Professional Engineer in the technical areas of on-site stormwater and wastewater design and construction supervision. I have worked in the area of stormwater engineering design and consenting for 22 years.
- 2 My previous work experience includes consenting, design and construction supervision for small residential stormwater systems up to large commercial stormwater systems. I specialise in designing stormwater treatment and disposal systems to match the receiving environment.
- 3 My role in relation to Foodstuffs (South Island) Properties Limited's (**Foodstuffs**) application to establish and operate a PAK'nSAVE supermarket and associated access, loading, car parking, signage, earthworks and landscaping at 157 Levi Road, Rolleston (**Application and Application Site**) has been to provide advice in relation to determining the Regional Council consents and to assist in determining suitable stormwater treatment and disposal for the Site. I drafted the Memorandum on Regional Consenting Requirements, which appears at Appendix L of the Assessment of Environment Effects (**AEE**) accompanying the Application.
- 4 My assessment is based upon the proposal description attached to the evidence of Mr Mark Allan as **Appendix 1**.
- 5 In preparing this statement of evidence I have considered the following documents:
 - (a) the AEE accompanying the Application;
 - (b) the Civil Design Advice memorandum and Erosion and Sediment Control Plan prepared by Keegan Brogden and presented in Appendix G of the AEE;
 - (c) the statement of evidence on Civil Design Advice prepared by Keegan Brogden;
 - (d) regional council planning provisions relevant to my area of expertise;
 - (e) section 42A report

Code of Conduct for Expert Witnesses

- 6 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2014 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.

Scope of evidence

- 7 I have prepared evidence in relation to:
- (a) the existing groundwater and geological environment of the Application Site;
 - (b) the key findings of my Memorandum on Regional Council Consenting Requirements;
 - (c) matters raised by submitters to the Application; and
 - (d) matters raised in the Selwyn District Council's (**SDC**) report (report issued under s42A of the RMA).

The existing environment

- 8 The site is located to the south-east of the main Rolleston township. The Landcare Research soils mapping data base, SMaps, shows the surface soils, which are defined as up to one metre below ground, as being either a shallow loam or moderately deep to deep silt. These soils are described as either moderately well drained or well drained.
- 9 A review of the nearby bore logs available on Canterbury Maps shows the topsoil is underlain by sand or silt to 1.5 to 3 m below ground and then gravels to the base of the bore holes.
- 10 A review of nearby stormwater discharge consent applications available on Canterbury Maps to the south and south-west reported very rapid soakage from depths varying from 2.5 m to 4.5 m. All of the stormwater from the neighbouring developments discharge to land via ground soakage systems, such as soak pits.
- 11 I have undertaken soakage testing at several sites in Rolleston. The testing found soakage rates in excess of 6,000 mm/hr at depth varying from 2 to 4 m. This is considered to be very rapid and good for disposing of stormwater to ground using soak pits.
- 12 The piezometric contours on Canterbury Maps show groundwater in the area flows in a general south-easterly direction. A review of groundwater level data from nearby wells shows that the depth to seasonal high groundwater at the site is expected to be 8 m below ground.
- 13 There are two public supply wells, BX/0827 and BX/0508, located approximately 290 m to the south-west of the Application Site at its nearest point. These wells are

181m and 188m deep respectively and have 100 m well protection zones. The stormwater disposal locations at the Application Site will not be within the public supply protection zones.

- 14 There are no nearby surface waterways to the Application Site.

Activities on Site

- 15 I have assessed the following activities under ECan's operative regional plans, the Canterbury Land and Water Regional Plan (**CLWRP**) and Canterbury Air Regional Plan (**CARP**):

- (a) discharge of construction phase and developed phase stormwater to land. Construction phase stormwater will be managed on-site in accordance with the ECan Erosion and Sediment Control toolbox. Developed phase stormwater will be discharged via soak pits sized to contain stormwater from events up to and including the 2% AEP (50 year), 24 hour duration storms.
- (b) stormwater from the hardstand areas will be collected in sumps and treated using a proprietary filter, such as a Stormwater360 Stormfilter, providing a high level of treatment. Roof water is considered to be relatively free of contaminants and will be discharged directly to ground via soak pits (no treatment).
- (c) earthworks required for building foundations, reshaping for car parking and installation of services. The deepest excavation is expected to be 5 m bgl for stormwater soakage pits;
- (d) fuel storage (during construction stage); and
- (e) air discharge for fugitive dust during construction works.

Regional consenting requirements

- 16 Selwyn District Council (**SDC**) holds a global stormwater consent for Rolleston, but it does not include this Site. The Site is commercial and therefore a consent is required to discharge construction phase and developed site stormwater to land (5.94A-5.96, CLWRP).
- 17 The earthworks across the site will meet the conditions of the permitted activity rule 5.175 of the CLWRP. Therefore, a land use consent from ECan is not needed for earthworks.
- 18 The discharge of construction phase dust will be managed using a Site Management Plan in accordance with the permitted activity rule 7.32 of the CARP. Therefore, an air discharge consent from ECan is not needed.

- 19 I note that the Site is not on ECan's Listed Land Use Register and therefore not considered to be contaminated. However a Detailed Site Investigation will be undertaken by Pattle Delamore Partners Ltd to check for contaminants.

Matters raised by SDC staff report

- 20 The Officer's Report presents draft consent conditions and notes to the consent holder relating to stormwater consenting and SDC approvals. Recommended changes to these are covered in Keegan Brogdon's evidence. The discharge of stormwater to land at the site will be authorised by an ECan discharge consent. This consent will be held by Foodstuffs.

Conclusion

- 21 Under the CLWRP a resource consent is required for the discharge of both construction phase and developed stormwater as a discretionary activity. It is considered that design solutions are available to adequately mitigate any potential effects on the environment. Therefore, there should be no impediment to grant of the future necessary resource consents.

Fiona Anne Ambury

Dated this 18th day of July 2022