

Before the Hearings Commissioners at Wellington City Council

---

*under:* the Resource Management Act 1991

*in the matter of:* an application by Ryman Healthcare Limited for resource consent to construct, operate and maintain a comprehensive care retirement village at 26 Donald Street and 37 Campbell Street, Karori, Wellington

*between:* **Ryman Healthcare Limited**  
*Applicant*

*and:* **Wellington City Council**  
*Consent Authority*

Summary Statement of **Ajay Anilrao Desai** on behalf of Ryman Healthcare Limited

---

Dated: 13 September 2022

---

Reference: Luke Hinchey (luke.hinchey@chapmantripp.com)  
Nicola de Wit (nicola.dewit@chapmantripp.com)

chapmantripp.com  
T +64 9 357 9000  
F +64 9 357 9099

PO Box 2206  
Auckland 1140  
New Zealand

Auckland  
Wellington  
Christchurch



**SUMMARY STATEMENT OF AJAY ANILRAO DESAI ON BEHALF OF RYMAN HEALTHCARE LIMITED**

1 My full name is Ajay Anilrao Desai. My qualifications and experience are set out in my statement of evidence dated 29 August 2022.

**Earthworks**

2 The potential for sedimentation and erosion effects will be managed via compliance with the "Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region" (February 2021). An Erosion and Sediment Control Plan will be prepared for certification by the Wellington City Council (*Council*) prior to the commencement of each stage of earthworks. In my opinion, sedimentation and erosion effects will be appropriately managed.

3 I consider appropriate dust control on the Site can be achieved by limiting the area of earthworks exposed at any one time and using water (either via water tankers or a sprinkler / irrigation system) over the exposed areas of the Site.

4 The Council earthwork engineer agrees with this approach.<sup>1</sup>

**Stormwater**

5 The stormwater strategy for the Site was agreed with Wellington Water.<sup>2</sup> The strategy is to develop an onsite stormwater solution that will ensure flood neutrality upstream or downstream of the Site for the 100-year Climate Change storm event by:

5.1 Not increasing flooding upstream or downstream along the overland flow paths/flood extents of the Site compared to base case in terms of flood levels and/or flood extents; and

5.2 Providing for flows to the stormwater network that would not result in increased flooding downstream with manholes spilling more than base case in terms of flood levels and/or flood extents.

6 To achieve those outcomes, a private flood attenuation device will be provided to store approximately 1,400 m<sup>3</sup> of stormwater flow.

**Flooding**

7 Based on the flood modelling, I consider there is no flood risk to the Proposed Village within the Site for all the scenarios modelled. I also confirm the Proposed Village will not increase flood risk to properties upstream or downstream of the Site for all the scenarios

---

<sup>1</sup> Council Officer's Report, Appendix 8 – Earthworks – John Davies, paragraph 18.

<sup>2</sup> Council Officer's Report, Appendix 12 – Wellington Water Limited – David Wilson, paragraph 18.

modelled and will decrease flood risk at some properties. The stormwater design for the Site will provide significant benefits for properties along Donald Street and minor improvements for properties along Campbell Street and Scapa Terrace in terms of flood depth. The evidence of Mr David Wilson for Wellington Water confirms the Proposed Village will achieve the agreed flood hazard management requirements.<sup>3</sup>

**Stormwater quality effects**

- 8 Stormwater runoff from the Proposed Village has a very low risk of contamination. I have adopted a Best Practicable Option (*BPO*) to manage water quality and treatment. Rain gardens are not practicable on this Site, but proprietary treatment devices that comply with Wellington Water’s “Water Sensitive Design for Stormwater: Treatment Device Design Guideline” will be provided. In my opinion, stormwater quality to the receiving environment will be appropriately treated to required standards.

**Stormwater quantity effects**

- 9 The Proposed Village will increase the total impervious area of the Site by approximately 17.5%, which will result in an increase of runoff from the Site. To assess the changes in flows, I used the flood model to run smaller higher frequency rain events. My assessment confirmed that the baseflows to the Karori Stream along the northern boundary of the Site will increase by 0.1 m<sup>3</sup>/s (from 0.2m<sup>3</sup>/s to 0.3m<sup>3</sup>/s) as a result of the proposed upgrades to the stormwater bypass with negligible increase in peak velocities (0.3m/s). All flows are contained with the stream banks.
- 10 The reuse tanks proposed within the Site for irrigation purposes will provide a combined storage of approximately 45 m<sup>3</sup> that will perform a retention and detention function. Using the stormwater device sizing tool provided by Auckland Council,<sup>4</sup> I have confirmed this volume is sufficient to manage the stormwater quantity effects from the increase in imperviousness within the Site. In my opinion, the Proposed Village will not result in adverse water quantity effects in more frequent smaller rainfall events.

**Potable water**

- 11 There is sufficient capacity in the water supply network to accommodate the Proposed Village. The Proposed Village will meet the firefighting water supply requirements in SNZ PAS 4509:2008.

---

<sup>3</sup> Council Officer’s Report, Appendix 12 – Wellington Water Limited – David Wilson, paragraphs 21-22.

<sup>4</sup> I explain at paragraph 107 of my evidence why this tool is considered to be appropriate in the absence of any similar tool for Wellington.

The evidence of Mr Wilson confirms that the Site has access to water supplies sufficient for potable water and for firefighting.<sup>5</sup>

### **Wastewater**

- 12 The Proposed Village will have less demand on the downstream network compared to the previous use of the Site. In addition, the flows are below the peak flow allowances for the Site within the Wellington Water model. I therefore consider it is not necessary to provide any wastewater storage onsite. The evidence of Mr Wilson confirms that the local wastewater network has sufficient capacity for the Proposed Village.<sup>6</sup>

### **Response to submissions**

- 13 I consider all of the infrastructure-related issues raised by submitters have been addressed in the design of the Proposed Village infrastructure and in discussions with Wellington Water.

### **Updated drawings**

- 14 I confirm that I have reviewed the updated drawings and descriptions of the changes to the drawings lodged in the memorandum dated 11 September 2022. There is a minor change to the impervious area shown on drawing RCA08 (70.98% impervious rather than 70.6% impervious as originally assessed), but it does not alter my previous assessment and conclusions. I am also comfortable that the final village design and the actual imperviousness of that design will be used for the final infrastructure design.

### **Draft conditions**

- 15 I have reviewed the Council's draft conditions and I consider a small number of amendments are required for the reasons set out in my evidence. In summary, these amendments are:
- 15.1 Conditions 70 and 72: to accurately acknowledge the stormwater strategy agreed with Wellington Water;
  - 15.2 Condition 73: to apply to uncovered carpark areas only, as there is no runoff from covered carparks;
  - 15.3 Condition 74: to refer to the specified proprietary devices, as rain gardens are not a practicable option for the Site;
  - 15.4 Condition 80: to remove the requirement to assess alternatives, as the optioneering process has already been

---

<sup>5</sup> Council Officer's Report, Appendix 12 – Wellington Water Limited - David Wilson, paragraph 87.

<sup>6</sup> Council Officer's Report, Appendix 12 – Wellington Water Limited - David Wilson, paragraphs 85-86.

completed and the proposal is the preferred alternative; and

- 15.5 Condition 82: to delete the reference to the Code of Practice for Land Development, as that document relates to infrastructure that will be vested in Council.
- 16 I conclude that there are no civil engineering issues that would preclude the granting of consent for the Proposed Village.

**Ajay Anilrao Desai**  
**13 September 2022**