



5 December 2022

Name of applicant/Requiring Authority: Wellington City Council Service Request Number: 519248

Site address: 127 and 141 Stewart Duff Drive, Rongotai (Moa Point)

Proposal: The construction, operation and maintenance of a new Sludge Minimisation Facility (SMF)

Oral Submitter Details:

Organisation Name: Guardians of the Bays Incorporated

Contact person: Yvonne Weeber- Chair of Guardians of the Bays Postal Address: 143 Queens Drive, Lyall Bay, Wellington 6022 Email: guardiansofthebays@gmail.com Phone: 027 222 5390

Submission Introduction

Guardians of the Bays (GOTB) is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on an isthmus surrounded by either sea or predominately residential neighbourhoods. Our members and supporters have mixed views on the SMF proposal. Guardians of the Bays is therefore making a neutral submission.

The Guardians of the Bays were involved in consultation on the SMF early in 2022 and attended the consultation at Ruakawa Community Centre on Sunday 18 September 2022.

Oral Submission Statement

We are neutral on the application.

We believe a number of aspects of the application need to be improved with changes to the conditions of consent.

Building design and landscape of the SMF

The proposed SMF will be viewed by Strathmore Park, Rongotai, Lyall Bay and Melrose residents plus people traveling around Wellington Airport and on Stewart Duff Drive. This proposal will further change the environment that adjoins the WIAL's proposed changes of the Hillock removal and East Side Area development and future airport buildings are constructed.

This is a coastal environment has had many man made modifications but this proposal continues the dramatic modification of this coastal environment. The Wellington City Proposed District Plan has the Hue tē Taka Peninsula/Rangitatau Palmer Head- Outstanding Natural Feature as an outstanding natural feature and landscape. The WC153 Strathmore coastal shrubland, WC154 Moa Point Coast Platform and shrubland, WC175 Moa Point gravel dunes, and WC176 Lyall Bay dune as a significant natural areas. The relationship of these outstanding natural and significant natural features should be considered in greater detail in the project design.

With the flat landscape of an airport as the foreground the background hills and the proposed SMF buildings and structures will be visually prominent. Removal of the ridge behind the proposed SMF building and WIAL Hillock will further increase this prominence.

There is a cumulative effect of the SMF proposal and the existing Moa Point Sewage Treatment Plant, future Wellington Airport buildings and ongoing removal of geographic features. The receiving environment will become more industrial and less 'natural' environment.

As the SMF is a designed on a public budget it should be designed to the highest possible design standards. It is impossible to 'disguise' the size and random nature of the buildings and structures, but placement and overall design should include the materials, pattern and a full colour palette.

Limiting the palate of colours in the conditions is not appropriate to a landscape that turns parched yellow during summer months to bright green in spring conditions and where Strathmore Park and Miramar residents will see





the SMF with a background of the sky. (see power point photos). The design of the buildings and structures need greater design creativity rather than a 'painting it recessive colours and leaving it there'.

Artist finishes that do not include text are welcomed as one way of providing a story to the building and its environment. However the overall total picture of the buildings and their overall design should be considered.

The use of a large pallet of colours should be considered to provide to both connect with the seasonal hill landscape and the urban development that surrounds the airport. Monochrome recessive colours will in essence make this jumble of buildings look bigger, bleaker and stand out more from a variety of different viewpoints as per the landscape visual assessment photomontages.

The Airport (carparking building) and Lyall Bay (Lyall Bay Surf Club) are two buildings that use a tiled facade approach with combinations of coloured tiles to reducing the bulk and form of the buildings. These buildings don't just use recessive colours but a palette of colours to break down the bulk and provide interest as part of the design. While we are not proposing this as the only option we are pointing out the proposals of this bulk should look beyond using just the use of recessive colours. When the viewing audience see the buildings against the sky or with a background of seasonal changing landscape e.g. yellow parched hills of summer the use of recessive in grey, green and brown colour hues will actually increase the bulk of the buildings and structures.

Waste water plants throughout the world are designed with flair and more than a collection of 'utilitarian' building with no architectural merit. It is true there are no close neighbours to the plant who will view it across the road. But the building has a large visual catchment area and is an entrance to a major transport hub of Wellington. Its size and shapes of this SMF will mean everyone who views the SMF would benefit from advanced aesthetics e.g. quality architecture, design, materials and colour (See power point photos).

In respect to the concrete used on the retaining walls it is often better to let concrete age with the landscape rather than colour it in a way that will make it more visually prominent in the landscape.

Ecology-Landscape and Vegetation Management Plan

The Guardians of the Bays support the new condition 21.2 of a Landscape and Vegetation Management Plan and ongoing engagement with Predator Free Wellington.

Construction noise, dust and odour

The Guardians of the Bays are concerned that significant noise, dust and odour that could be generated by the construction of this SMF. In particular we are concerned about noise from construction during the night airport curfew hours e.g. crane lifts of oversized equipment. We agree that residents need to be advised about the any activities within the curfew hours or that exceed night-time recommended noise limits. Consideration of compensation or alternative accommodation during these nights should be considered in the conditions.

Access to Stewart Duff Drive (the WIAL private road) that acts as a through road between the coast and the Mirmar community.

Guardians of the Bays is concerned about the restrictions on access along Stewart Duff Drive. While we know this is a private road it should be considered as an essential access route for vehicles, cyclists and pedestrians. This access is also important for Moa Point residents to access higher ground in case of a Tsunami.

Transport planning of construction and ongoing management of the SMF

The Guardians of the Bays see that there is a conflict between construction times, especially in the evening and on Saturdays and the normal recreational practices of the Lyall Bay. Peak use at Lyall Bay ebbs and flows but is often between 3 and 6pm when construction traffic could be intensive from the site. This is particularly an issue as its all your heavy construction traffic that will be entering Lyall Parade via Moa Point Road where there is a convergence of surfers, dog walkers, general recreation users, shoppers, café users, general traffic movements, cyclists and pedestrians.

Route 1 Lyall Parade, Onepu Road and Evans Bay may be arterial vehicle route but at present the road surface of Lyall Parade is breaking up and requires a total reconstruction to get it to a manageable surface for the present





road users. With additional heavy vehicles this road surface will deteriorate further. In addition mitigation measures will be required with increased traffic such as concrete pours due to conflicts between trucks and all the other users of Lyall Parade, Onepu Road and Evans Bay. (Power point photos)

We propose a lower speed limit be considered during construction especially along the main access routes in Lyall Bay, Rongotai and Kilbirnie. This lower speed limit should be consideration due to the recreational users in Lyall Bay, and Evans Bay Parade (Kilbirnie Green), the commercial centres of Rongotai and Kilbirnie, the residential areas of Lyall Bay, Kilbirnie and Rongotai and schools in the area.

Community liaison group

The Guardians of the Bays supports the development of a Community Liaison Group and relationship to the construction phase of the SMF. Note this was never called a committee. This group should include Moa Point, Strathmore Park, Lyall Bay, Kilbirnie and Rongotai residents, schools and sports clubs. Yvonne Weeber (Chair of Guardians of the Bays) been part of the Community Liaison Group due to her long involvement with the Moa Point treatment Plant and she welcomes a refresh of the group. For the construction and the long term management of the Moa Point Sewage and Sludge Treatment site and output.

Communication

Communication is a two way process. Lyall Bay Community has a very good Facebook group which should be used to provide information to the Lyall Bay community. In addition there should be a 24/7phone line and email where residents can make enquiries and complaints related to noise, odour, traffic movement and a number of other issues and get a quick response during the SMF construction phase.

Proposed SMF designation conditions- from Mr McGimpsey's Planning Evidence 18 November 2022 pg 45-73 The Guardians of the Bays:

Definitions- Support the changes to definitions but would suggest any NZ standards used in these conditions should be recorded in the standard.

- 19.1 Support the inclusion of 'While providing for further development of the design and layout'
- 19.2 Support the inclusion of a 'Landscape and Vegetation Management Plan'.
- 19.6 Support the wording in relationship to the Hillock being in the WIAL Main Site Area Designation.
- 20.1 Support the information on the height to avoid confusion.
- 21.1 Support the design statement wording that removes the colour palate and concentrates on the reduction of height and bulk and would suggest that this occurs with what the design statement shall do:

All colours and materials applied to publicly visible parts of the SMF shall be selected from the blue, blue/gray, grey, green and brown hues of the a colour palette that relates to the natural environment, of either the hillside and its vegetation or the sky and seascape that surrounds it. excluding the gas bag(s).

- 21.2 Support the further information on the Landscape and Vegetation Management Plan.
- 21.3 Support the development of a Erosion and Sediment Control Plan but would suggest the conditions should include information on what should be provided in this in a similar way to the Landscape and Vegetation Management Plan.
- 24.5 Support that dust should be kept to a minimum during construction and the Erosion and Sediment Control Plan
- 24.6 Support the new run off conditions for water flow.
- 25.1 Support greater detail in the Construction Management Plan.
- 25.2 Support the inclusion of advance communication with residents.
- 25.5 Support the earthworks the inclusion of the Contaminated Soils Management Plan.
- 25A.1, 25.A.2 and 25.A.3 Support the Geotechnical Assessment Report, monitoring and construction review of earthworks
- 25.1, 25.2 Support the ecology conditions.
- 228.1 Support a Community Liaison Group.



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Hearing for the
Sludge Minimisation Facility
Presented by Yvonne Weeber

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Treatment Plan
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Canada





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