

Presentation by James Fraser on behalf of:

Claire Nolan, James Fraser, Biddy Bunzl, Margaret  
Franken, Michelle Wolland, and Lee Muir

Submission #275

# Matters in our submission for stream 1:

1. that the lack of Three Waters infrastructure be regarded as a qualifying matter, given that the level of densification and the nature of that densification will seriously impact the quality of all 3 waters, but in particular will affect stormwater.
2. that our position takes heed of the fact that flooding, alongside earthquakes, is of national importance and concern under the RMA Section 6(h) re. **Natural Hazards**.
3. to express our concern at the Council response in Section 42A which suggests that the Council has neither the information nor capacity “to justify to a site specific level, an ‘other qualifying matter’ under NPS-UD 3.32(1)(h).”

## The Council do know that:

- There is a high level of concern about the poor current state of the city's three waters infrastructure and its capacity and ability to cope with current residents let alone the demands of expected population growth of 50,000-80,000 more people.
- “Wellington City's three waters infrastructure is ageing with many parts of the network in poor condition and deteriorating, . . . The network (some parts of which are over 100 years old) was designed for a much lower density development, with much higher areas of permeable surfaces, . . . compared to development that occurs now, which consists of smaller sections and higher areas of impermeable surface.”

(Three Waters Assessment Report to Council, March 2021)

## The Council do know that:

Newtown is rated:

**Red** (High; Significant/major network upgrades and investment required) in both **Waste and Stormwater**

**Orange** (Medium; Poor condition, under capacity infrastructure with suburb-wide or reasonable investment required) in **Drinking Water**

(Wellington Waters' *Three Waters Mahi Table*)



# The Council do know the Flood Zones in Newtown

Existing sources such  
as the Wellington  
City Council's Flood  
Zones

[https://gis.wcc.govt.  
nz/LocalMapsViewer  
/?map=5c3d903dc4c  
043e0953410033c5c  
0b3e](https://gis.wcc.govt.nz/LocalMapsViewer/?map=5c3d903dc4c043e0953410033c5c0b3e) show the  
extent of the flood  
risk in Newtown.





# The Council do know

## Owners' site-specific flood risk information

“This property has been identified as possibly at risk of flooding during severe storm events (1 in 100 year Annual Return Interval + 20% Climate Change Intensity). This risk has been identified from either historic flooding records or flood modelling compiled by Wellington Water. . . . **If new construction is contemplated on this property this flood risk information will be taken into consideration and may have implications on minimum floor levels and natural hazard assessments.**”

(Record from **WCC\_Flood\_Hazard\_Combined\_17122020**)

# The Council doesn't have in-depth information on:

- site by site water pipes in order to be able to say:  
**“If new construction is contemplated on this property . . .”.**
- “Wellington alone has 2500 or so kilometres of water pipes. They are underground and therefore invisible. Until recently, when fancy camera equipment has made it possible to examine bits of pipe underground, it's been almost impossible to know what state individual pipes are in. It's still difficult, labour-intensive and expensive.”  
(Nikki Mandow, Newsroom, Feb, 2021. <https://www.newsroom.co.nz/of-geysers-sinkholes-sewage-and-depreciation>)

## We have observed:

- Pipes leaking and bursting as a result of deterioration over time and damage (including earthquake damage)
- Aging pipes suffering from increased infiltration of both groundwater and salt water (in low lying areas) reducing their capacity to convey water.
- Overflow of wastewater during sustained or heavy rainfall events into streams, and coastal waters, not to mention streets.
- Newtown has a large catchment including springs and underground streams which contribute to an increased number and severity of flooding events because of increased stormwater discharges and a lack of stormwater network capacity.





## The Council has been advised:

The 2022 Wellington Regional Housing and Business Capacity Assessment Update (HBA) report of May 2022 comments:

- Upgrades “will need to be prioritised and will require a staged approach to increase capacity for housing.”
- There will need to be well targeted but extensive investment in new infrastructure to align with urban planning for future population growth.

## Since our initial submission, we have seen:

- unprecedented flooding and damage exacerbated by inadequate stormwater structures and impermeable surfaces in urban areas
- predictions that events such as this will increase, as will damage and costs associated with repair
- an increased interest in “spongey cities”

## We submit that:

- The management of Three Waters, particularly aspects related to flooding, falls within the purview of managing significant risks from natural hazards.
- In order to act in a way that will protect areas such as Newtown, we deem it critical that the Council avails itself of site by site:
  - flood risk information
  - the state of the pipe infrastructure
- Densification can be done well and selectively so as not to exacerbate the risks associated with climate change and unpredictable extreme weather events such as those recently experienced in Auckland.
- Densification must be carefully planned in areas that are not flood prone or in which there are fragile pipes, and/or where infrastructure upgrades are in train.

## We support:

- Live Wellington’s major tenet in their oral submission : **“Infrastructure [for the Wellington inner suburbs] needs to be in place first, before growth can occur”**.
- Newtown Residents’ Association in their concern in the written submission around the impacts of: **“specifying wide areas where developments of 6 stories [sic] must be enabled, without prior investigation of the development capacity”**
- Red Design Architects’ and (Martin Hanleys’) proposal to enable taller development in the Newtown character housing areas along Riddiford St where **infrastructure improvements must be focused and prioritised**.

## We oppose:

- Kainga Ora’s written submission to increase Medium Density Residential Zone heights by up to 5 storeys within 5 min/400m walkable catchments.
- Generation Zero’s written submission to extend the walkable catchment.



# Matters for our submission for stream 2:

Include but are not restricted to the following:

1. Extension of **character precincts** in Newtown,
2. Retention of the **demolition** rule in Newtown,
3. Evidence about the **character values** of Newtown.

Newtown has a rich history stretching from pre-European days when mana whenua used the area as gardens, and then subsequent European settlement.

There is evidence of early built heritage and character on the Thomas Ward Map of 1890 which we will present, as well as visual evidence of extensive areas of pre-1930s houses.