

Plan Change 77 Submission - Trelissick Park Group

Thank you for the opportunity to lodge a submission, which is as follows:

1. Name and Contact Details:

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2. Trade Competition and Adverse Effects

We could not gain an advantage in trade competition through this submission.

Trelissick Park is directly affected environmentally.

3. The specific provisions of the Proposed Plan Change 77 that our submission relates to are as follows:

See 4 and 5 below.

4. Our Submission is that:

This site adjoins a significant ecological corridor for flora and bird/insect/stream life. Any development could affect the ecology of the whole Kaiwharawhara Stream valley. The vegetation within the corridor along the Kaiwharawhara Stream valley is regionally significant, as are the Kaiwharawhara Stream itself, the seepage wetlands above the site (with glow-worm community) and the buffer vegetation that extends into the site.

Our other concern is with monitoring. Experience with other developments has demonstrated lax monitoring during the work and subsequently, by Council officers.

Our submission is to provide greater recognition of the above, as follows.

Recommendations in Appendix 4 of the Ecological Report - We think the Plan Change does not take sufficient notice of the mitigation recommendations in Appendix 4 of the ecology report entitled "Ecological Assessment of 55-85 Curtis Street, Wellington, Stage Two" by Wildland Consultants. This report is in the Appendix of Section 32 Report of the Plan Change Documentation. We would like to see the Plan Change comply with these mitigation recommendations.

Showcasing a "Green" Business Area - The development presents a great opportunity for Council to showcase a "green" Business Area, in the spirit of its "Our Living City" project. This would benefit not only the ecology, but also enhance the standing of both the Council and the businesses with the public.

One of our concerns is with the cumulative effect of fast stormwater run-off during heavy rainfall from hard surfaces such as roofs, driveways and car parks. All stormwater in the catchment goes into the Kaiwharawhara stream. During heavy rain the stream quickly floods and destroys stream banks and riparian planting. This causes stream bed sediment build-up, affecting invertebrates and fish life. Mitigation methods are referred to on p.4 of the Landscape Report in the Appendix of Section 32 Report of the Plan Change Documentation, as follows: "Minimising impacts on Kaiwharawhara Stream by restricting

water run-off. This limits paving or roof areas or demands alternative solutions in the form of permeable

paving, green roofs and/or swales and storm water detention areas."

A wetland area, planted with native grasses, sedges and rushes, would also help slow/absorb stormwater before discharge into the Kaiwharawhara Stream and enhance the attractiveness of the area.

Monitoring and Sign-off - We are concerned about monitoring during the progress of the work and afterwards. It is suggested that a section be added covering periodic inspection, then sign-off at completion by a Council officer, certifying compliance with the resource consent conditions. Sometimes problems arise well after completion, so the added section should also cover subsequent monitoring.

5. We seek the following decisions from the Council:

Rule 35.1 Introduction

Add to end of 2nd last paragraph (see italics) so that it now reads: ".....the adverse effects of activities are avoided, remedied or mitigated, particularly with regard to effects on adjacent Residential Areas *and the ecology of the Kaiwharawhara valley.*"

Rule 35.2.3.3 (...residential character, landscape and ecological values....)

Replace:

"Encourage the retention of trees and vegetation along the western edge of the area adjacent to Old Karori Road."

with:

"Ensure native bush restoration and protection along the bank between the Curtis Street site and Old Karori Road, along the length of Old Karori Road, to establish a dense, self-sustaining forest plant community."

Rule 35.2.3.7 (...residential character, landscape and ecological values....)

Replace:

"Encourage the use of permeable surfaces to enhance visual amenity and reduce incidences of sudden, large volume discharges to the Kaiwharawhara Stream."

with:

"Ensure the use of the following to reduce fast stormwater run-off to the Kaiwharawhara Stream:

- permeable surfaces on all outside parking areas, driveways, service areas and paths
- stormwater piping with detention provisions
- a dedicated seepage wetland area."

Rule 36.6 (f) Landscaping and screening

Item iii: Insert "native" before "vegetative" (see italics), so that it now reads:

"Any earthworks and/or retaining structures within 10m of the western site boundary and involving vegetation removal must include *native* vegetative planting and landscaping."

Add new item iv (wording based on recommendations in the Ecology Report referred to in 4 above) as follows:

"Native bush restoration and protection must be applied along the bank between the Curtis Street site and Old Karori Road, along the length of Old Karori Road, to establish a dense, self-sustaining forest plant community, as follows:

- Mass planting of large specimens (PB45 or PB60 size)
- Select species that will seal the edge of the buffer at ground-level, others that will grow rapidly, and some that will be tall, long lived and will provide food for birds
- Apply fertiliser and deep mulch to improve the growth and health of existing trees
- Address any gaps from vegetation removal that planting can not remedy in the short term, eg by use of brush fence panels
- Remove plants listed in the Regional Pest Management Strategy. Replace weeds and exotic trees gradually as the replacement buffer planting becomes established. Poisoned exotic trees can be left standing as support for indigenous climbers such as *Muehlenbeckia australis*"

Add new item v as follows:

"To enhance visual amenity and reduce fast stormwater run-off into the Kaiwharawhara Stream, a dedicated seepage wetland must be planted with appropriate grasses, sedges and rushes to take all stormwater from the site before it is discharged into the Kaiwharawhara Stream."

Add new Rule 36.6 (p) "Stormwater" as follows:

Before discharge into the proposed wetland at the northern end of the area, the stormwater system shall incorporate detention provisions, such as increased piping volume, to slow stormwater flow during heavy rainfall."

Rule 36.7 Assessment Criteria

Section (d), 7th bullet point:

Add (see italics):

"Uses species and patterns of planting that are characteristic of the locality and enhance the development *and the Kaiwharawhara valley ecological corridor, all in accordance with Rule 36.6 (f)* .

Section (d), last bullet point:

Add (see italics):

" Maximises the use of permeable materials and surfaces *and stormwater detention provisions*".

Add new Section (k) as follows:

"(k) Monitoring

Periodic monitoring will be carried out by Council officers, including inspection during the work and sign-off at completion, certifying compliance with the resource consent conditions. Subsequent monitoring will extend over the following years."

6. We wish to be heard in support of our submission.

Regards,

Peter Reimann
(Chairman)

10 March 2013

Membership drawn from Highland Park Progressive Association Inc., Ngaio Progressive Association Inc., Onslow Historical Society Inc., Private Landowners Group, Royal Forest and Bird Protection Society (Wellington Branch), Wellington Botanical Society, Wadestown Resident's Association.