

Comments: 122 Churchill Drive Application

From: Peter Reimann
Sent: Tuesday, January 24, 2017 9:53 AM
To: planning@wcc.govt.nz
Cc: Andy Foster ; Simon Woolf ; Diane Calvert ; Peter Gilbert ; Ngaio Crofton Downs Residents
Subject: Comments - 122 Churchill Drive Application - Trelissick Park Group

In the email below, Nicole Heron of WCC City Planning and Design has advised that we are unable to make a formal submission due to the Planner determining Trelissick Park Group is not an affected party, but that any comments would be welcome. We have reviewed the documentation you kindly sent by email and our comments are as follows.

1. Trelissick Park is Potentially Affected - The Park lies in the valley directly below the proposed development and is potentially affected by sediment/silty run-off during earthworks/construction. This affects aquatic life in the streams running through the park and down to the harbour. Further comments are in 2 – 6 below.

2. Silt Retention - We know that 'super silt fences' below filled slopes are intended, together with a sediment pump pit to convey treated water to the stormwater pipe (p.2 of the Earthworks Management Plan in Attachment 5). This stormwater ends up in the streams in the Park.

There have been recent failures of the silt mitigation scheme at the 131 Silverstream Road development in Crofton Downs, which is causing major siltation in the Trelissick Park streams. This leads us to doubt reassurances from developers and resource consent assessors. How confident is the developer that the fences/pump will always work satisfactorily during prolonged heavy rain?

3. Risk of Erosion/Slips from Working on Steep Slope above Railway Facing the Park - We are concerned for the following reasons:

- *Partial vegetation removal* - The Landscape and Visual Assessment in Attachment 2 refers to partial removal of vegetation along the boundary (p.9). This will include some of the steep slope at the SE (south-east) corner.

- *Added fill* - Some fill will be added on the steep slope at the SE corner (Earthworks Management Plan in Attachment 5 Drawing 21772 EWMP "Preliminary Design Earthworks Management Plan").

- *Pile drilling spoil* - Pile foundations 5 m deep are proposed in p.12 of the Geotechnical Report in Attachment 6 on the eastern perimeter slope above the Park. This will result in spoil around each drilling location.

- *Marginal stability* - The Geotechnical report in Attachment 6 mentions marginal slope stability and evidence of an old slip (p.8, p.10).

Although the Earthworks Management Plan refers to earthworks areas to be stabilised (p.2), there appears to be a risk of erosion and further slips along those slopes for the above reasons, more than could be handled by the silt fences. This could lead to sediment/silty runoff into the streams in Trelissick Park.

4. Notification Decision Report Omissions

- *Effect on Aquatic Life Ignored* - The “Effects on the Open Space Area (Trelissick Park)” on p.8 addresses only minor shading and the experience of park users. The effect on aquatic life of sediment/silty run-off from the development is ignored. We also note the concluding statement on p.11 under “Earthworks” that “no persons are considered adversely affected by the earthworks” – ignoring the potential effects on the aquatic life in the streams below.

- *Sediment Run-off into Park* - There is mention of sediment run-off onto KiwiRail land on p.10 due to “adverse stability and erosion, dust and sedimentation effects”, but no mention of this carrying on to the Park below. From 2 and 3 above, we are wary of the reassuring statement on p.11 that the “proposal satisfactorily addresses the potential stability issues within the site” and that “the effects of erosion and sediment loss can be adequately managed during earthworks”.

5. New Planting at Boundary above Railway – We are pleased to see that the Landscape Concept in Attachment 7, Appendix C proposes only NZ natives endemic to the area to be planted along the boundary above the railway. Trelissick Park has a lot of trouble from exotics growing as a result of seeds migrating from adjacent land. However, could you please delete *Corynocarpus laevigatus* (karaka) from the Native Tree Species illustrations on the last page. Although karaka exists in the Park it is a native alien and we are trying to eliminate it where possible.

6. Green Walls – There is much local concern about the size of the development. The effect could be softened by use of green walls for the building. WCC have been writing ‘Water Sensitive Urban Design (WSUD) Guidelines’, employing the biophyllic principles now being used in various cities around the world. There is a good example of a green wall outside the main library at the entrance to Civic Square. We would like to see this employed here – good for the residents, neighbourhood and environment (eg stormwater run-off slowing).

We look forward to your advice on how you will address these concerns.

Regards,

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