



## **COMMENTS ON MINISTRY FOR ENVIRONMENT DISCUSSION DOCUMENTS ON ACTION PLAN AND POLICIES FOR HEALTHY WATERWAYS**

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### General Response to the Proposals

The Ministry for the Environment is to be congratulated on the discussion document 'Action for Healthy Waterways', with input from advisory groups and the associated 'Draft National Policy Statement for Freshwater Management'.

The Trelissick Park Group is restoring the Ngaio Gorge area in Wellington to a native bush wilderness. It is part of the ecological corridor, which runs from the harbour to the outer green belt. Kaiwharawhara Stream, which runs through the Park, has a huge catchment, with large urban areas, and steep hillsides, so suffers from:

- fast stormwater runoff from hard surfaces (roads, roofs, footpaths, pavers, parking areas)
- sedimentation from earthworks and stream-banks getting washed away
- pollution (sewer leaks, paint and cement washings, detergents, landfill leachate, oil/rubber from roads, litter and plastic of all sizes down to 'micro').

Zealandia's 'Sanctuary to Sea' project is also trying to address these problems with all participants in the catchment.

It will be a formidable task to obtain agreement on the action plan and policies, then implement them. A good management structure in collaboration with local authorities, industry, the community and all participants - with adequate funding - are key. A major worry is future governments reigning in environmental provisions of the Resource Management Act and limiting expenditure on the action plan and policies. A further worry is the processes getting bogged down by sector interests.

We can only comment on some of the details from an urban catchment perspective and we can only answer some of the associated questions. We support the intent of the urban catchment proposals and the idea of a National Policy Statement for Urban Development in 11.2.

### Questions (p.19)

1, 2, 3 - Regarding urban catchments we think the proposals will stop further degradation, although with uncertainty about the time-frames and subject to our comments below.

4 - Actions on urban catchments: city and regional councils and in our case, also Wellington Water.

5 - Funding for fish passage would help - see comment under 5.5.

7 - An independent national body to provide oversight of freshwater management implementation appears logical, in view of the number of parties involved - see comments in our general response above.

### 5.2 to 5.3 - Holistic Ecosystem Health Monitoring

The extreme variability of stream flow, contaminants and aquatic life, with maximum flows in heavy rain caused by fast stormwater run-off from hard surfaces in the catchment, present difficulties for monitoring and setting limits. Other urban catchments would have similar problems, so continuous monitoring would be necessary in these cases.

### 5.5 - Providing for Fish Passage

Wellington City Council has surveyed the Kaiwharawhara catchment for barriers for fish passage and prioritised actions. However, nothing happened subsequently due to lack of funding - apart from upgrading a ramp installed early this century. Fish surveys have been carried out and there is a need for improvement.

### 5.9 - Reducing Sediment

City Council consents for new developments require sediment run-off mitigation measures - but not always effective, we have found.

However, the origin of sediment in our urban catchment is mainly from stream bank erosion when the streams are in spate (see comment under 7.3). Riparian planting helps but sometimes gets swept away. Sediment build-up in beds is variable due to the stream changing course and changes of flow. Therefore, see comments above under 5.2 to 5.3 concerning monitoring due to variability.

Questions (p.52)

20, 21 - We are not qualified to comment on attributes, but the aquatic health in our urban catchment will only improve by making 'Water Sensitive Urban Design' mandatory (not just guidelines - see comments on 7.3), also by more planting and by improving fish passage.

22 - We support any measures to protect threatened indigenous species.

23, 24 - We support the fish passage requirements - see also comments on 5.5.

27, 28, 29 - We support the proposal to limit stream loss, which should also include ephemeral streams. We prefer streams to be left 'as is', avoiding any need for offsetting.

### 7.3 - Stormwater

Fast runoff - As previously mentioned, Kaiwharawhara Stream, which runs through the Park, has a huge catchment, largely urban, so suffers from fast runoff from hard surfaces and because of the steep hillsides. During heavy rain the stream level rises up to 2 metres and becomes a dirty raging torrent. We have advocated with the City Council for mitigating measures on stormwater over the years and some Council consents now incorporate provisions, but we would like to see Council's 'Water Sensitive Urban Design Guide' made mandatory for all new developments, with neutral effect on stormwater run-off. This should also apply to infill housing. Offsets could be from green roofs, roof rainwater collection, stormwater detention or a rain gardens in the vicinity. We suggest this be applied across the whole country.

Paint and cement washings, detergents and plastic of all sizes down to 'micro' - More education and waste minimisation are necessary. Most people do not realise that stormwater flows into local streams, with potential environmental effects. Education in schools should start from early childhood, giving biodiversity and the environment equal importance to e.g. 'numeracy and literacy'.

Pollutants - Can be mitigated to an extent by use of rain gardens and planting of grasses.

Sewer leaks and landfill leachate - Local authority problems, with limits to funding for infrastructure upgrades.

Questions

48 (p.62) - National stormwater policy - see comments above.