

Dear Sir/Madam,

1 April 2014

**Submission on Application for Resource Consent - 55-85 Curtis Street - SR Number 282346**

**Submitted by**

Peter Reimann  
On behalf of: Trelissick Park Group  
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**Reasons for Submission**

To oppose the application for earthworks and vegetation clearance for the following reasons:

1. Application should not be considered in isolation from appeals on DPC77, ie before decisions made on these appeals.
2. Our concern is with the Kaiwharawhara Stream ecology. This stream flows through Trelissick Park further down-valley. Section 4.5 of the November 2012 Report 297b "Ecological Assessment of 55-85 Curtis Street, Wellington, Stage Two" by Wildlands is relevant and is copied in the Appendix to this submission.

The Council Notification Decision Report Service Request No. 282346, File Reference 1057263 effects assessment on "Dust and Sediment Run-off" states "In regards to sediment run-off the applicant has set out that [an] Erosion and Sediment Control Plan will be implemented. This plan will be designed to ensure that erosion and sediment run-off are adequately managed". Given that 4,000 truck movements are required, the addition of fill and subsequent earthworks will cover several weeks/months. It is inevitable that there will be substantial rain storms during this period. We are concerned that the run-off will overwhelm the sediment management methods during these storms and aggravate the sedimentation in the Kaiwharawhara Stream, to the detriment of stream life.

3. We are also concerned about any removal of bush cover. This site is at a very narrow part of the ecological corridor extending from the harbour along the Kaiwharawhara valley up to Zealandia.
4. We are surprised that seemingly little or no consideration is given to the views of WCC Parks staff, which should be an important part of this process.

I do not wish to present my views at a Council meeting.

Regards,  
Peter Reimann  
(Chairman  
Trelissick Park Group)

## **Appendix**

Section 4.5 of the November 2012 Report 297b “Ecological Assessment of 55-85 Curtis Street, Wellington, Stage Two” by Wildlands is copied below:

### **“Kaiwharawhara Stream**

“Kaiwharawhara Stream is open and flows in a natural channel for most of its length, which is unusual for an urban stream. It is forested along much of its route (Figure 3) and teems with indigenous fish, eight species in all, including six with the national threat status of At Risk-Declining. It is rare for an urban stream to support such a wide diversity of fish species. Kaiwharawhara Stream is piped beneath 55-85 Curtis Street and the closed landfill to the north but still receives all of the stormwater from the land above.

“The headwaters of Kaiwharawhara Stream within Zealandia have good water quality (Kingett Mitchell 2002). However, water quality deteriorates as the stream flows through the catchment in response to a combination of historic pollution, and inputs from closed landfills, the rail corridor and the City Council-owned stormwater network (Kingett Mitchell 2004).

“There are signs that the cumulative effects of stormwater discharge are adversely affecting aquatic biodiversity in the Kaiwharawhara Stream and that a trigger point for adverse effects on ecological values may already have been reached. A trigger point is reached when populations fall to such low levels that recruitment fails. Without intervention local populations can then decline into extinction. Signs that the trigger point might have been reached include poor macroinvertebrate sampling scores (Milne and Perrie 2006), blow-outs of fish passes, and downward trends in freshwater fish recruitment, as discussed at a recent inter-agency meeting held at Greater Wellington Regional Council on 29 March 2012.

“Perrie et al. (2012), found no significant change in the macroinvertebrate scores or any of the other water quality parameters monitored three kilometres downstream from Curtis Street over the period 2004-2011. This indicates that water quality in the downstream reaches is neither improving nor deteriorating.”