

Submission by Trelissick Park Group on WCC Proposed District Plan

From Peter Reimann 11 September 2022



Stormwater problems

Trelissick Park in the valley between Wadestown and Ngaio/Crofton Downs is at the lower end of a huge urban catchment stretching from Khandallah to Karori. All the stormwater from the catchment goes into the streams, which flow through the park. During heavy rain the stormwater from impervious surfaces such as roads and roofs causes the streams in the park to become raging torrents up to 2 m deep, which carry away stream banks and trees. One footbridge was recently carried away, and another undermined. Both had to be replaced. The sewer line foundations next to Korimako Stream were also undermined, requiring expensive remediation by Wellington Water.

With housing intensification and more extreme weather events due to climate change these problems are becoming worse.

Supported items

We are pleased to see stormwater hydraulic neutrality and water sensitive design covered in THW, THW-03, THW-P5, THW-P1 (with links in these to the Wellington Water Regional standards and Specification for Water Services), THW-R1, THW-R2, THW-R4, THW-R5, THW-R6, SUB-P3, and SUB-S4.

Requests

It is essential that all building developments, including infill housing, mandate at least neutral or lesser stormwater runoff, compared with pre-development.

We request that all Restricted Discretionary and infringement provisions for stormwater be deleted. See below for details.

Alternatives

We acknowledge that stormwater slowing provisions on steep sites or in cramped areas may be difficult to achieve, but there are innovative solutions such as roof water tankage, green roofs/walls, stormwater detention or creation of offsets* in the catchment nearby, such as planted swales or rain gardens.

Details of requests sought

THW-R1.2 Connection to existing three waters infrastructure – new residential buildings.

Activity status: Restricted Discretionary

Amend to:

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with requirements of THW-R1.1 for **Wastewater and Water supply** cannot be achieved.

Matters of discretion are:

1. The relevant sections of the Wellington Water Regional Standard for Water Services, v3.0, December 2021.

Notification Status: An application for resource consent made in respect of rule THW-R1.2 is precluded from being either publicly or limited notified.

THW-R2.2 Connection to existing three waters infrastructure – four or more residential units and non-residential development. Activity status: Restricted Discretionary

Amend to:

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with any of the requirements of THW-R2.1 for Wastewater and Water supply cannot be achieved.

Matters of discretion are:

1. The relevant sections of the Wellington Water Regional Standard for Water Services, v3.0, December 2021;
2. Design and effectiveness of an alternative solution;
3. Ownership, maintenance and operation arrangements; and
4. Any site constraints.

Notification Status: An application for resource consent made in respect of rule THW-R2.2 is precluded from being either publicly or limited notified.

THW-R4 Incorporation of water sensitive design methods – four or more residential units and non-residential activity. Activity status: Restricted Discretionary

Delete

THW-R5.2 Hydraulic neutrality – 1-3 residential units. Activity status: Restricted Discretionary

Delete

THW-R6.2 Hydraulic neutrality – four or more residential units and non-residential buildings.

Activity status: Restricted Discretionary

Delete

LLRZ-S8 Permeable area [in Large Lot Residential Zone]

60% permeable surface is too vague.

Amend to require neutral or lesser stormwater runoff, compared with pre-development.

Delete all words in right-hand column concerning infringement.

MRZ-P9 Permeable surface

HRZ-P9 Permeable surface

Too vague.

Amend to require neutral or lesser stormwater runoff, compared with pre-development.

SUB-P15 Protection of significant natural areas

SUB-P16 Subdivision in significant natural areas

Subdivision should not be allowed in significant natural areas.

Delete SUB-P15 and SUB-P16.

SUB-S4 Stormwater management

Delete all words in right-hand column concerning infringement.

THW Three Waters

Request: We are concerned about degradation of the streams in the Kaiwharawhara catchment from stormwater and slips like the recent Wilton Park slump, causing downstream silting. Mitigation following increasingly frequent storm water events needs to be a priority to maintain the stream ecosystem. We wish to highlight the importance of action to manage stream and bank damage following rain and storm events.

Schedule 8 Significant Natural Areas

Add Heke Reserve (in Ngaio).

* **Offsets:** Recognising the difficulty that some sites would have to achieve neutral or lesser stormwater runoff, compared with pre-development, the suggested offsets would need to be funded by the developer as a part of the consent.

Submission support

This submission is supported by *Zealandia Te Māra a Tāne* as an organisation.