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greater WELLINGTON  
REGIONAL COUNCIL

File No: X/26/05/123  
27 April 2007

Peter Match  
Porirua City Council  
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SUBMISSION

27 APR 2007

NO: 12

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Greater Wellington is the promotional  
name of the Wellington Regional Council

Dear Peter

**District Plan Change 6 To The Porirua District Plan (Judgeford Hills)**

I attach a copy of Greater Wellington's submission on the above plan change application.

If you have any queries please feel free to contact me.

Yours sincerely

**Ling Phang**  
Policy Advisor

Direct dial: (04) 382 7955  
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**Attachment:** Copy of GW's submission

WGN\_DOCS#423330-V1

Water, air, earth and energy: elements in Greater Wellington's logo that combine to create and sustain life. Greater Wellington promotes **Quality for Life** by ensuring our environment is protected while meeting the economic, cultural and social needs of the community.

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## GREATER WELLINGTON REGIONAL COUNCIL

### SUBMISSION

**To:** Porirua City Council  
**Submission on:** Private Plan Change 6 to the Porirua City District Plan  
(Judgeford Hills) – EQM Farming Limited

#### 1. Submission

Greater Wellington Regional Council wishes to make a neutral submission on the proposed plan change application at Judgeford Hills. In general, Council supports the approach to the development of the site but believes that there are a number of matters that should be addressed as part of the plan change proposal.

#### 2. Reasons for the Submission

Greater Wellington recognises and supports the effort that has gone into making plan change 6 an environmentally sensitive and innovative proposal. The use of structure planning as a framework to guide the development of the site by defining the future land use patterns, areas of enhancement and areas of protection, the roading network and infrastructure for managing the effects of development are all to be commended.

Many of the on-site aspects of the proposal have been carefully considered. However, Greater Wellington suggests that there are four broad resource management matters that should be further addressed to provide more integrated management of the environmental issues within the site.

##### 2.1 Open space network

Greater Wellington considers that access from the south-western corner into Belmont Regional Park would be particularly desirable. Access from the proposed new loop road within the subject site could occur through the 'environment enhancement area' (on the south-western corner) into the park.

The Overall Structure Plan shows the roading network within the subject site will be proposed public or private road (Drawing C905). However, page 14 of Boffa Miskell's report states that although the proposal includes a network of open space and trails, it is not proposed that the trails and paths would link to areas beyond the site.

Greater Wellington believes that it would be beneficial that public access be provided to the north western margins of the Belmont Regional Park to enhance both community

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connectivity & accessibility to public open space network. Additionally, in the future if Transmission Gully goes through it, the subject site can also link through to the park via an underpass about 1km away from the south-western corner of the subject site.

Greater Wellington also considers that any future access should be for the use of pedestrians, horses and cycles.

## 2.2 Transport

As the transmission gully designation runs through the north-west corner of the subject site, Greater Wellington recommends that the proximity of any building platforms within the development proposal should take into account potential reverse sensitivity impacts (noise, vibration, dust, vehicle emissions) associated with the future construction and use of Transmission Gully motorway.

## 2.3 Natural Hazards

Greater Wellington has responsibilities under the Resource Management Act 1991 for natural hazards. We note that there are two main hazard risks in this area: Earthquake hazards and slope failure risk.

The site is crossed by the Moonshine Fault and dextral strike-slip fault with an indeterminate recurrence interval. The exact location of this fault is unknown, therefore a hazard zone of 40 metres either side of the fault trace producing a total hazard zone of 80 metres wide is appropriate. This would allow sufficient distance to take account of uncertainty surrounding the fault location.

Greater Wellington supports the application of the precautionary principle of hazards management which is a key principle of sound land use planning. We recommend that no dwellings be built in this 80m hazard zone.

The site is situated in rolling hill country that has been incised by stream and gully erosion. Overall the area has a low to moderate risk of slope failure, but there are some steeper areas where the risk is higher.

The soils are classified as Makara Steepland Soils and Korokoro Hill Soils that are composed of loess and silty colluvium deposited over a jointed Greywacke bedrock. This type of substrate is prone to sheet and gully erosion in heavy rain. When saturated with water, such as during a wet winter period, it is also prone to slumping and slipping on steep ground. Severe ground shaking from an earthquake can also trigger slope failure in hilly terrain of this nature, especially when it is saturated.

Earthworks in loess soils are prone to causing silt runoff and slipping if not properly controlled. Earthworks are at high risk of failure if they are not *retained*, *compacted* and *drained* properly. Greater Wellington recommends that any cut and fill works in steep ground for roads and building platforms are carried out to recognised engineering standards. We also recommend that any building platforms, roads, and dwellings avoid the

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areas of steeper relief over 30° and that the steeper areas classified as 6e6 in the New Zealand Land Resource Inventory are not developed, but are kept vegetated or allowed to regenerate.

## 2.4 Ecological values & Pauatahanui Stream catchment

Greater Wellington acknowledges that the proposed design principles have been put in place to protect the areas of native forest, scrub, wetlands, streams and downstream to the Area of Significant Conservation Value - Pauatahanui Inlet. Greater Wellington supports the general intent of the principles. However, there is no clear statement of the proposed modification of the wetland areas in terms of sediment retention and polishing of stormwater. The impact of this modification on stream hydrology could be significant, particularly as it is upstream of the Inlet. This issue should be addressed as part of the proposal. This is further commented on, below.

The proposal is in a sub catchment of the Pauatahanui Stream, which is identified in Part B Appendix 2 of the Regional Freshwater Plan (RFP) as having a high degree of natural character.

Policy 4.2.10 of the RFP is: "To avoid adverse effects on wetlands, and lakes and river and their margins, identified in Appendix 2 (Parts A and B), when considering the protection of their natural character from the adverse effects of subdivision, use and development."

Reclaiming the bed of any river in this catchment is a non-complying activity (refer Rule 50 of the RFP).

Policy C4A.3.1.3 of the plan change application should better recognise the need to protect the Pauatahanui Stream from the effects of the development by improving requirements for sediment control and by making the stream planting requirements more explicit.

Greater Wellington supports the provision of an Environmental Management Plan (EMP) for the whole subdivision site. However, to ensure that the Environmental Enhancement Areas are managed in an integrated fashion, the EMP should also include additional matters listed of erosion and sediment control, and construction management, which are discussed in the subsections of this submission that follow.:

### 2.4.1 Section D4A1.2 Land use activities

Rule xv (page 31) categorises "the establishment and maintenance of wetlands, areas of native vegetation and walking tracks" as a Permitted Activity in all zones affected by plan change application. The plan change does not provide any clear mechanism to protect the wetlands from the effects of sedimentation. It is also not clear what "maintenance" actually means. There is also no distinction between whether this provision applies to both constructed and natural wetlands.

Rule xvi categorises earthworks in the primary production areas as a controlled activity. The Pauatahanui Inlet is sensitive to sedimentation from earthworks and vegetation

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disturbance in the catchment. All earthworks that do not comply with the minimum standards for earthworks should be a discretionary activity. All earthworks will require extensive controls to adequately manage and minimise the amount of sediment released. The inclusion of these amendments will ensure that these rules are consistent with Policy C4A.3.1.3.

#### 2.4.2 Section D4A.2 Standards for Permitted Activities & Section D4A.3 Standards for Controlled Activities

The standards do not include any requirement for sediment control. This is essential for any earthworks undertaken in the catchment. The threshold of 1,000 square metres in any 12 month period is too high for a permitted activity and the slope threshold is too steep for both permitted activities and controlled activities. Works that are unstable will occur below these thresholds.

The Pauatahanui Inlet is sensitive to sedimentation from earthworks and vegetation disturbance in the catchment. All earthworks that do not comply with the minimum standards for earthworks should be discretionary activities.

#### 2.4.3 Section D4A.3.6 (Setbacks)

The setback distances for buildings from watercourses are supported. This should also apply to rivers and wetlands. However, the term "watercourse" should be changed to "rivers and wetlands" to remain consistent with the Act.

#### 2.4.4 Section 5.2 Stormwater management

The plan change application proposes to add a fish friendly weir to the lower end of the large central wetland. Greater Wellington considers that the use of an existing wetland for stormwater treatment will not encourage a sustainable environmental outcome. However, we support the construction of a wetland as part of the stormwater infrastructure.

### 3. Relief sought

The Greater Wellington Regional Council requests that the above matters be addressed to better promote the integrated management of environmental effects. The relief sought for each matter as listed below should be considered as part of the plan change decision making process:

- As indicated "in the reasons for the submission", the benefits of providing public access to the north western margins of the Belmont Regional Park to enhance both community connectivity & accessibility to public open space network should be considered. Additionally, if the Transmission Gully goes ahead, linkages should be available to the park in the future by means of an underpass about 1km away from the south-western corner of the subject site. Any future access should also be for the use of pedestrians, horses and cycles.

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- Greater Wellington recommends that any cut and fill works in steep ground for roads and building platforms are carried out to recognised engineering standards. We also recommend that any building platforms, roads, and dwellings avoid the areas of steeper relief over 30° and that the steeper areas classified as 6e6 in the New Zealand Land Resource Inventory are not developed, but are kept vegetated or allowed to regenerate.
- D4.A.1.2 Rule xv - Explain what is meant by "maintenance" in terms of wetlands and areas of native vegetation i.e. whether it is referring to a naturally occurring wetland or a constructed wetland.
- D4.A.2.1 - All earthworks must be managed and the adverse effects minimised, at least to the extent recommended in the Greater Regional Council Erosion and Sediment Control Guidelines. The volume threshold should be no more than 100 cubic metres (and still include sediment control).
- D4.A.2.1 - The slope threshold should be no more than 22 degrees to reduce the risk of slips and soil loss.
- D4.A.1.2 Rule xvi: Make earthworks a discretionary activity.
- D4.A.3.6 – change "watercourse to "river or wetland".

#### 4. Involvement in the Hearing

The Greater Wellington Regional Council wishes to be heard in support of its submission. Greater Wellington would also welcome the opportunity, prior to any hearing, to clarify and discuss the matters raised.



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**Murray McLea**  
Acting Manager, Environmental Policy

27/04/07

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Date