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To:

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From:

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**Comments on Resource Consent Application, Service Request No. 393294 - 128 Trelissick Crescent, Ngaio**

We received advice of the above application from a nearby resident. Trelissick Park lies directly below so would be directly affected. We are not in favour of this application for 17 units on the site. It is situated above the environmentally sensitive original forest remnant and is at the beginning of an exceedingly steep sided gorge, which continues down through the Park to the valley floor. We have the following comments.

**1. Opportunity to Become an Iconic Low Environmental Impact Development**

Wellington has been a Biophilic Cities Member since 10 October 2013 - see <http://biophiliccities.org/partner-cities/wellington/>. A development with fewer units than those proposed on this site provides an opportunity for it to become an example of the use of biophilic principles to neutralise any impact on the very environmentally sensitive area of Trelissick Park below and on the surrounding area. It could also be a promotion opportunity for the organisations contracted to do the work and for Council.

This can be used to show how much-needed urban development can exist in harmony with the unique environment that makes Wellington such a liveable city, with its hills and bush areas within the suburbs. Great efforts are ongoing by volunteer groups to restore bush areas, make Wellington predator-free, bring back the birds and stream life, in conjunction with Council and Zealandia. Urban development is possible in an ecologically sustainable way.

**2. The Plan**

The plan proposes the development of 17 town houses including associated driveways.

The developer notes that they can construct 4 x 2 storey buildings on the site as of right and that a 4 dwelling development would have a similar impact on neighbouring properties as the proposed 17 townhouse development.

However, the impact of a 4 dwelling development as compared to a 17 dwelling development on the wider neighbourhood and more specifically the Trelissick Park valley is much more severe.

**3. Assessment of the Plan against Council Planning Guidelines**

The assessment of the plan indicates that the proposed units do not meet the permitted standards with respect to parking, visitor parking, water bodies, open space, height, separation, decks, earthworks standards, structures on legal road and recession planes. It also requires unorthodox solutions with respect to discharge of stormwater and sewerage, because of the number of dwellings it is trying to squeeze on to a challenging site.

The proposed plan pushes outside the planning boundaries. A less ambitious plan would work within the planning guidelines and pose less of a risk to the Trelissick Park valley which the property overlooks.

**4. Stormwater**

The application states that there is no public stormwater service for the site. Stormwater from the driveway and houses would be split into different catchments and discharged into the gully via four proposed outlets, each 20 m<sup>2</sup> and with 1.5m deep excavation. The outlets would include rip-rap for erosion protection of the gully. It also states that on-site attenuation is not considered to be necessary as the discharge is to an open gully and existing stream network.

Currently there is one dwelling on the site. Dwellings plus yards and driveways with hard, impermeable surfaces, would introduce a significantly increased area of stormwater run-off from this site. If discharged into the gully this would significantly increase the stormwater discharge into the steep gully below the site and then into the Kaiwharawhara Stream.

The Kaiwharawhara Stream takes all stormwater from Karori up to Khandallah. It is heavily impacted by fast stormwater discharge from the hard surfaces of roofs, roads, driveways and parking areas in this huge catchment of around 20 km<sup>2</sup>. The stream quickly rises up to 2 m in heavy rain to become a destructive torrent, washing away stream banks and recently bank gabions and the foundations of two of Council's footbridges.

Local councils and the national government have all pledged to clean up our rivers and waterways. This application is counter to that imperative as it stands.

For any development on this site, we advocate for a neutral effect on stormwater run-off. Slowing provisions can be achieved by eg permeable pavers, provision of tanks to collect roof water, minimising bush removal and planting/landscaping, stormwater detention provisions, soak pits and 'green walls'. There is a good example of a green wall outside the main library at the entrance to Civic Square. WCC have also been writing 'Water Sensitive Urban Design (WSUD) Guidelines' and we would like to see this completed and implemented.

#### 5. Sewerage disposal

Although the plan is to connect the townhouse units into the existing sewer network it is noted that Units 8 - 17 (more than half the units) would need to operate on a shared private pressurised pumping system. Any mismanagement or failure of this sewer management system would impact directly on the watercourse that discharges into the Kaiwharawhara stream.

We already experience periodic breaches of the sewer system that runs along the Trelissick Park valley. Developments that over-optimize property development add unnecessary risks to this important waterway.

#### 6. Watercourse Management

The head of a side-stream of the main gully starts within the site and passes through the site. The topography of the Trelissick Park Valley supports a network of these watercourses, which are home for a wealth of flora, fauna and invertebrates. These watercourses all feed the Kaiwharawhara stream below, which also provide a home for eels, native fish and other aquatic life.

Details should be shown for what is planned to retain the watercourse that runs through this property should a development proceed.

#### 7. Stability of the Site

Given the recent land stability issues around the Ngaio Gorge area, we are very concerned about the wisdom of stripping the vegetation from a large section of this steep land just below two roads at the top of the Ngaio Gorge.

The Coffey Geotechnical Report in Attachment 10 expresses some concern about stability. It recommends a need for further geotechnical work. Surely this should be completed before this application is considered?

#### 8. Construction and Earthworks

The streams in Trelissick Park have been recently severely affected by siltation coming for many months from the housing development earthworks above Silverstream Road in Crofton Downs, so we are well aware of the importance of the integrity of earthworks.

Given the potential instability and the sensitive area of the Park below, the requirement in 5.1, Section 3, of the Earthworks Management Plan for it to be submitted to the Compliance Officer 10 days prior to the work commencing is far too short. There is no detail of stormwater detention and silt retention, except for passing mention of a silt fence around the gully at the eastern area of the site. We think details should be submitted before this application is considered.

Also, In 4.2 of the Coffey Geotechnical Report, there is a recommendation for a contractor "with a high level of experience of steep vegetated slopes". We support this recommendation, but worry about shortages of contractors and 'lowest price' mentality.

In 5.1, Section 14, it is noted that construction will take 2 years and landscaping will follow 3 months later. The planted trees will then take some time to mature and help to slow stormwater run-off. We suggest a temporary dam to retain stormwater and release it slowly.

Temporary fencing should also be provided along the lower boundaries to avoid building detritus from entering the watercourse and flowing down into the Kaiwharawhara stream.

We also note that there will be no construction in inclement weather. However, we are concerned that extended periods of bad weather may cause expensive delays and a temptation to over-ride this requirement.

We presume the excavation/fill work already done on the site was by another party outside the scope of this application. We would like to know what stormwater, sediment and landslip mitigating measures are being employed.

#### 9. Climate Change/Earthquakes

More extreme weather events due to climate change are inevitable, as are major earthquakes, with potential dire consequences for this development and the Park below.

10. Discharge Permit

When the applicant was filling out Form 9 at the beginning of the document, item 6 said...."Discharge permit under the Regional Freshwater Plan and Proposed Natural Resources Plan is required and will be applied for concurrently." It would be useful to have a copy of this application as it is pertinent to the issues we raise.

11. Positive Effects

Under 3.2 Positive Effects, the applicant makes the following two points:

"The proposal will help to achieve Council's objectives for new housing under the Wellington Housing Accord. "The proposal assists to achieve the aims of the National Policy Statement on Urban Development Capacity by providing sufficient development capacity to meet the needs of people and communities and future generations in urban environments."

Unless the applicant intends selling each of these units for \$400,000 or less this development will not assist with the current affordable housing shortage.

We do not believe this application for 17 units shows a helpful positive way of dealing with Wellington's housing problems.

It is argued that the effects of infill housing are 'less than minor', but many 'less than minors' become 'major' - insidious under the relentless pressure for infill housing.

12. Notification

With affected parties, such as the Trelissick Park Group, local residents and the many users of Trelissick Park, there is a clear case for this application to be publically notified.

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

Regards,

Peter Reimann  
Trelissick Park Group

Membership drawn from Highland Park Progressive Association Inc., Ngaio Crofton Downs Residents' Association Inc., Onslow Historical Society Inc., Private Landowners' Group, Royal Forest and Bird Protection Society Inc. (Wellington Branch), Wellington Botanical Society Inc., Wadestown Residents' Association.