

October 2013

Dear Sir/Madam,

Thank you for the opportunity to lodge feedback on the above. We have, where possible, aligned our comments with the questions in the feedback form.

Name and Contact Details

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Submission

WCC is to be congratulated for drafting this Guide. We feel it largely has the right focus and priorities and is logical and easy to follow.

Our Group have been working for more than 20 years restoring Trelissick Park in the Ngaio Gorge area to a native bush wilderness. The Korimako and Kaiwharawhara streams run through this Park and take all the stormwater from a huge catchment area stretching from Khandallah to Karori - about 20 km². Stormwater very quickly runs off hard surfaces such as roads, roofs and paved areas and the streams become brown, raging torrents. We watch in despair as stream banks get torn away, along with riparian plantings. Stream beds get covered in silt and gravel, smothering invertebrate life. We have also often witnessed significant pollution in the streams. The effect on fish life must be devastating.

Our Group has long been advocating for mandatory stormwater slowing provisions in new housing developments in the catchment to achieve neutral effect. We have also advocated for appropriate measures to counter sedimentation and pollution from such developments. The provisions of this draft Guide largely provide the mechanisms for achieving this. We have the following comments:

3.2 Infill Housing Potential Problem

We endorse the view of the Ngaio Crofton Downs Residents Association that infill housing could be a problem: some of the provisions of 3.2 may be difficult to achieve, through lack of space. This would then require upgrading of the WCC downstream stormwater system, such as provision of detention, swales or rain gardens.

Other Suggestions for Additional Provisions

(a) Fish Passage – Native fish migrate up and down streams during their life cycle. These streams often include culverted sections. There should be no drops/waterfalls to impede fish passage. “Daylighting”, with overhanging plants should be maximised, as further encouragement for fish life.

(b) Stormwater Exit Design - In Trelissick Park we have experienced serious erosion and land-slips caused by the stormwater exit from piping being well above the slope surface. All stormwater should be piped right down to the receiving stream, to avoid such problems.

(c) Filling-in Ephemeral Streams and Excavations by Developers – Ephemeral streams in the headwaters of a catchment are a vital part of the ecology, particularly for invertebrates. Developers have a penchant for removing all bush cover, then excavating the whole site. Yet the outstanding feature of Wellington is how the older houses have been designed to fit into the existing topography without excavation and bush removal. We strongly advocate for a return to this philosophy. Not only does this add to the uniqueness of Wellington, but it also minimises environmental effects and reduces the possibility of landslip from houses built on fill.

Education

Despite spasmodic attempts by WCC and GW to educate the public about not putting chemicals, paint, cement washings and detergents into the stormwater system this habit persists. Surely there must be more effective methods of getting the message across – eg starting with school children, also by radio, TV, Facebook, Twitter, local and national newspapers - the essence being repetition, stating reasons.

Council plans, policies, codes and standards

We would like to urge the Council to adopt the provisions of the draft Guide, subject to comments from submitters, and then ensure that they be incorporated into all relevant Council plans, policies, codes and standards as legal (not voluntary) requirements.

Regards,
Peter Reimann
(Chairman, Trelissick Park Group)