

9 November 2012

Friends of the Hutt River
c/o Pat van Berkel
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Pinehaven
Upper Hutt

1 CEX	UPPER HUTT CITY COUNCIL		8 PPM
2 ELMO	3790		9
3 DCOE	9 NOV 2012		10
4 DFRS	5 DCOM	6 DEB	7 11

35/12-015

Proposed Plan Change 15
Upper Hutt City Council
Private Bag 907
UPPER HUTT
Email: askus@uhcc.govt.nz

I/we cannot gain an advantage in trade competition through this submission.

Our submission relates to the proposed plan change as a whole.

The Proposed Plan Change 15 document is difficult to work with as it has no Contents, no Index, no page numbers and no Index Map.

Background

Friends of the Hutt River was established in 2011 following public recognition that the Hutt River was not in a healthy state. The vision of the group is that *the waters and margins of the Hutt River and tributaries are healthy and vital, for the benefit of all.* Our aims are to:

- Restore and protect the waters of the Hutt River and its tributaries to ensure their ecological integrity and intrinsic values
- Enhance the Hutt River and its environs for community enjoyment and life-supporting capacities
- Educate and inspire community members to be active caretakers of their local waterway

Reduce pollution

Plan Change 15 focuses on the floodplains of the Mangaroa River and the Hutt River between the confluence with the Mangaroa River and the Silverstream bridge. These areas are of great interest to the Friends. Through the work of Greater Wellington we know that the Mangaroa River contributes pollution to the Hutt River that, in turn, contributes to the growth of cyanobacteria in the river. **Plan Change 15 is an opportunity, while the attention is on the Hutt and Mangaroa River floodplains, to improve the quality of the rivers.** We would like to see considerable effort to improve the quality of the Mangaroa River. ***We request that Plan Change 15 be amended to incorporate requirements that reduce pollution of the Mangaroa River, such as keeping stock well away from the river and planting the banks of the river.***

Natural Hazards

Objective 14.3.1 and 14.4.2 have been modified to remove references to the environment. The environment is important. People and property need the environment ! Removing references to the environment misleads the public into thinking that protection from natural hazards only applies to people and property. But there are many environmental areas alongside the rivers that have intrinsic value and need protection from natural hazards. **Please revert the changes so that avoidance of adverse effects of natural hazards on the environment is clearly in the objectives, policies and methods of chapter 14.**

St Patricks Estate Area

Chapter 8 proposes to change the policies and methods for the St Patricks Estate Area Special Activity Zone. We are concerned that there is no clarity about the effects on the river of any possible development in the St Patricks Estate Area. If the Hutt River Corridor is diminished in size as proposed in 8.4.6 (eg, development to within 200m of the river) then this will channel the water into a narrower river channel causing more damage in a major flood from erosion and possible upstream and downstream effects. Subdivision should not be allowed in this area. It should be restricted to developments that enhance the river environs not negatively impact them. There is no explanation of how subdivisions will avoid the risk from flooding. **This needs to be explained in the document so that the public and Councillors know what it is implied by Chapter 8.**

The Natural Hazard Methods defined in 14.5 do not protect buildings and structures in the Flood Hazard Area. The Council lays itself open to future litigation as has occurred nationally over leaky buildings.

Permeability

The permeability of Upper Hutt has a significant effect on flooding in Upper Hutt and Lower Hutt. If rainwater can soak into the ground then it will not run off into the streams and rivers for quite some time. **We request that the Plan Change strengthen the requirements for permeability of properties.**

Waipango Wetland

The Waipango Wetland has been completely ignored in the document. It is not depicted in the rural planning maps or rural hazard maps. This is a significant floodplain area as during flooding the water ponds underground.

Friends of the Hutt River have a significant interest in the Hutt River and the Mangaroa River. We trust we will be invited to submit in the next round of submissions.

We wish to be heard in support of our submission.

Yours faithfully

Pat van Berkel

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