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For: Felicity Boyd

Dear Felicity

Submission on proposed (Private) Plan Change 40 - Wallaceville

Please find enclosed the Greater Wellington Regional Council's submission on proposed (Private) Plan Change 40 - Wallaceville.

Please feel free to contact me on 04 8304034 or caroline.ammundsen@gw.govt.nz if you have any questions or concerns.

Yours sincerely

Caroline Ammundsen
Policy Advisor, Environmental Policy

Encl: Submission



Greater Wellington Regional Council: Submission

To:	Upper Hutt City Council
Submission on:	Proposed (Private) Plan Change 40 - Wallaceville

1. Reason for submission

1.1 The Greater Wellington Regional Council (GWRC) wishes to make a submission on Proposed (Private) Plan Change 40 pursuant to Schedule 1 Section 6 of the Resource Management Act 1991 (RMA). Under Schedule 1, section 3 of the RMA, there is a requirement to consult with local authorities that may be affected by an application.

1.2 GWRC supports proposed (Private) Plan Change 40.

2. Policy framework

2.1 In assessing the Proposed (Private) Plan Change 40 (proposed Plan Change) for consistency with the Regional Policy Statement 2013 (RPS), GWRC is particularly interested in how this proposed Plan Change will support and contribute to achieving the sustainable management of natural and physical resources in the Wellington region.

Regional Policy Statement for the Wellington Region

2.2 The RPS gives guidance on the future direction for the sustainable management of natural and physical resources in the Wellington region. The RPS sets out objectives and policies to address regionally significant issues.

2.3 Policies in the RPS need to be given particular regard to when changing, varying or replacing city or district plans. There are a number of policies in the RPS which are relevant to proposed Plan Change 40.

2.4 Policy 42 seeks that the adverse effects of stormwater run-off from subdivision and development is reduced by having particular regard to:

- (a) limiting the area of new impervious surfaces in the stormwater catchment;
- (b) using water permeable surfaces to reduce the volume of stormwater leaving a site;
- (c) restricting zinc or copper roofing materials, or requiring their effects to be mitigated;
- (d) collecting water from roofs for domestic or garden use while protecting public health;
- (e) using soakpits for the disposal of stormwater;

- (f) using roadside swales, filter strips and rain gardens;
 - (g) using constructed wetland treatment areas;
 - (h) using in situ treatment devices;
 - (i) using stormwater attenuation techniques that reduce the velocity and quantity of stormwater discharges; and
 - (j) using educational signs, as conditions on resource consents, that promote the values of water bodies and methods to protect them from the effects of stormwater discharges.
- 2.5 GWRC notes that the proposed development is taking a stormwater neutrality approach which is consistent with this policy. The use of stormwater attenuation devices such as wetlands/ponds in the design of the development is also an outcome sought by the RPS.
- 2.6 GWRC supports the use of a Stormwater Management Plan and the recommendation to use a suitable low impact design stormwater management approach for the Wallaceville Structure Plan Area. The use of roadside swales, rain gardens and rain tanks as well as constructed treatment trains to improve treatment efficiency are all supported methods of reducing the adverse effects of stormwater runoff.
- 2.7 Policy 55 seeks that a compact, well designed and sustainable regional form is maintained for urban development beyond the region's urban areas and that the proposed development is the most appropriate option to achieving Objective 22 of the RPS.
- 2.8 Proposed Plan Change 40 gives effect to Objective 22 in that it promotes a compact, well designed and sustainable regional form that is integrated with a safe and responsive transport network. It will contribute to maintaining the vibrancy and vitality of Upper Hutt (identified as a regionally significant centre), is an urban development that reinforces the region's existing urban form, and is well integrated with public transportation. This Wallaceville ex-Agricultural Research site has been identified in the Upper Hutt Urban Growth Strategy (September 2007) has an area for future development which is also consistent with RPS Policy 55.
- 2.9 Policy 57 promotes the achievement of the key outcomes of the Wellington Regional Land Transport Strategy (now called the Wellington Regional Land Transport Plan 2015). Policy 57 provides a number of matters to have particular regard when plan changes are being considered including:
- Whether traffic generated by the developed can be accommodated in the existing network,
 - The connectivity and access to public services, key centres of employment etc.,
 - Whether there is good access to the strategic public transport network,

- Whether new, or upgrades to existing, transport network infrastructure has been appropriately recognised and provided for.

2.10 Details on how this proposed Plan Change addresses Policy 47 and Policy 57 of the RPS is provided in Sections 3.1, 3.2 and 3.4 below.

3. Comments

3.1 Public Transport (operations)

3.2 Public transport access is integral for the vitality and success of any community be it either residential or commercial. Public transport helps the local community access both employment and community facilities such as medical centres, libraries and education.

3.3 The area proposed for development is within 500m or 5 minutes walk of excellent public transport services. Wallaceville Railway Station is approximately 700m or 7 minutes walk. A frequent train service operates here on average every 20 minutes in the peak and 30 minutes in the inter-peak giving customers access to all rail stations along the Hutt Rail line. The Wellington Regional Rail Plan 2013-2035 details future plans for our region's rail network. These plans include an increase in peak trains from Wallaceville Station to Wellington Station from 3 trains per hours currently to 4 trains per hour.

3.4 Adjacent to the Hutt Rail line within approximately 2 to 3 minutes walk on Ward Street there is a pair of bus stops. These bus stops are serviced by the bus route 115 which operates Monday to Friday from 6.30am to 6pm with a 20 minute peak frequency and 60 minutes in the off-peak. This service travels from Upper Hutt Railway Station to Pinehaven via Silverstream Railway Station.

3.5 As access to both bus and rail services will be a relatively short walk from the development GWRC would like to emphasise the need for good pedestrian links to Wallaceville Railway station and the bus stops on Ward Street.

3.6 If patronage increases to a sufficient level it could be necessary to increase the level of service and infrastructure at Wallaceville Railway Station and the bus stops on Ward Street. To enable conscientious use of funds GWRC has a set of process which categorises public transport infrastructure according to factors such as patronage and location, and identifies service gaps. Then the gaps are assessed against a prioritisation framework in order to strategically allocate funds for potential improvements across the region.

3.7 In summary the proposed plan change could potentially contribute positively to the use of public transport in the vicinity as it will give those living or working at the development good access to the public transport network.

Strategic transport

3.8 The subject site for the proposed Plan Change is supported as it is located directly adjacent to the existing urban areas to the north and east.

- 3.9 Wallaceville Rail Station is also located a short distance (approx. 200m) from the eastern Ward Street entrance to the site, and around 800m from the western edge of the site. This means the site is considered to have good accessibility in relation to a core rail service (refer 'Transportation Assessment Report' page 8, section 2.6.2).
- 3.10 GWRC supports the higher density residential developments that are to be located at the eastern Ward Street part of the subject site, closer to the railway station and the Upper Hutt town centre to the north-east (refer Structure Plan map) as this creates easy accessibility to public transport for those living in these houses.
- 3.11 GWRC supports the structure plan that provides for mixed uses and local retail around the Ward Street entrance (refer Structure Plan map) as well as the good connectivity provided through the site and with adjacent areas through the use of paths for pedestrians and cyclists.

Speed reduction on Alexander Road

- 3.12 GWRC would like to specifically support the proposal to reduce the speed limit on Alexander Road to 60 kph (or to 50kph), to recognise the need for appropriate safe speeds adjacent to the proposed new residential area, and to support wider urban design outcomes. It is noted that 50 kph would be safer and more encouraging for walkers and cyclists, and is consistent with speed limits in the adjacent urban area.
- 3.13 We have also included several detailed comments regarding road layout design that we would like given consideration. The Regional Land Transport Plan 2015 (RLTP) includes objectives, outcomes and targets aimed at increasing cycling use, safety and attractiveness. The Cycling Network chapter of the RLTP identifies the need for the cycle network to be developed to provide options for both less experienced cyclists through to experienced cyclists who wish to travel at greater speeds. Best practice guidance is provided in New Zealand by the 'Cycle network and route planning guide' and 'Pedestrian Planning and Design guide' available on the NZ Transport Agency website.

Alexander Road cyclist provision:

- 3.14 It is noted that Alexander Road is popular with road cyclists as part of much longer commute trips and recreational rides. The existing Alexander Road layout in the vicinity of the subject site provides a good sealed shoulder for on road cyclists and no on-road parking. The proposed Alexander Road cross section provides a new 2.5m 'shared path' facility which is likely to be used by less experienced cyclists and children together with pedestrians, but is unlikely to be used by existing road cyclists along this route.
- 3.15 GWRC recommends that the Alexander Road design provides safety for road cyclists by continuing an adequate on-road shoulder or cycle lane through to Ward Street. The currently proposed Alexander Road cross section suggests two 4.2m wide lanes with a 3m flush median and on-street parking on one side of the road. Given the risk associated with cycling in the door zone, a buffer zone or cycle lane between parked cars and cyclists could be provided (at the expense of a portion of the generous flush median for example).

- 3.16 It is also noted that the proposed provision of pedestrian islands as part of the Alexander Road cross section will create a pinch point at pedestrian crossings. Good practice (as described in Figure 15.8 of the LTNZ Pedestrian Planning and Design guide) recommends that the road lane width be 4.5 m where pedestrian islands are provided, to safely facilitate cars and cyclists together.

Safety as part of other local road layouts

- 3.17 GWRC notes that the proposed ‘heavily planted’ boulevard and local streets could obscure visibility at driveways and intersections, and create safety risks for pedestrians and cyclists. It is important that consideration be given to safety impacts alongside the visual amenity and storm water benefits of this approach as part of the final landscape design.
- 3.18 In order to further encourage safe vehicle speeds, more self-explaining road features might also be used (specifically to limit straight line visibility).

3.2 Flood Protection

- 3.3 It is noted in the ‘Wallaceville Stormwater Management Principles’ that “flood attenuation for the overall site will be achieved through the use of wetlands/ponds, underground storage devices and increased onsite ponding/flooding. The proposed storage must cater for the storage required for flow attenuation for the increased runoff resulting from development of the site for all storms up to the 1% AEP event”. It is also noted that the Stormwater Technical Report states “determination of increased run-off volumes at the time of Detailed Design, also needs to take into consideration, the effects of climate change”.
- 3.4 GWRC supports the approach of stormwater neutrality for the development, as there are existing flooding issues downstream in the Heretaunga Drain/Hulls Creek catchment. The stormwater neutrality design should allow for appropriate climate change, which although appears to be in the technical document isn’t reflected in the principles.
- 3.5 Esplanade reserve and stream/drain setbacks for development should be sufficient to allow for watercourse migration, maintenance access (machine) and recreational use into the future. The effects of flash flooding and debris flows (if applicable) may also need to be investigated. Sufficient width should be provided along watercourses to allow for sustainable management into the future, with the potential for structural works required to protect assets or private land being avoided through setbacks and riparian management.
- 3.6 GWRC recommends that in carrying out development and setting building floor levels for development, all flooding (i.e. the Probable Maximum Flood or PMF, which is the 0.0001% Annual Exceedance Probability (AEP) event) should be avoided not just the 1% Annual Exceedance Probability (AEP) event. GWRC notes that for the Maymorn Structure Plan Area, avoiding the flood hazard was the approach taken by UHCC.
- 3.7 GWRC supports the restoration of riparian areas within the Wallaceville area.

3.8 Biodiversity

3.9 Overall, GWRC considers that the management of ecological effects associated with the development at the Wallaceville site is achievable. For instance, the proposed Plan Change recognises areas protected for conservation purposes and provides some opportunities to connect remnants of indigenous forest. However, in line with provisions in the RPS, it is recommended that habitats of threatened species are identified and protected and provisions are made to protect and enhance significant indigenous vegetation. This is necessary to ensure the adverse ecological effects are adequately managed and significant indigenous biodiversity values are protected from inappropriate subdivision, use and development.

(a) Protection of threatened species

3.10 In order to adequately manage adverse effects, GWRC suggest that further work is needed to identify whether the proposed Plan Change adversely affects the habitats of threatened species. Policy 23 of the RPS provides criteria to identify habitats and ecosystems with significant indigenous biodiversity values. These criteria include rarity, which recognises species that are scarce or threatened.

3.11 Further, when considering plan changes, RPS policy 47 directs councils to determine whether the proposed activity is inappropriate with regard to: “seasonal or core habitat for indigenous species”. If habitats of threatened species are identified within the development area, the proposed development may need to be amended to provide for their protection. Depending on the results of the surveys, this may involve designing the development to avoid effects on the habitats of threatened species or to restore the habitat in another location within the development area to mitigate any losses.

3.12 GWRC recommends that surveys be carried out to determine the presence of native fish in waterways or drains and of birds in areas with mature trees. The Wallaceville Ecological Assessment undertaken by Morphem Environmental Ltd (Ecological Assessment) does not include surveys to establish the presence or absence of threatened indigenous species likely to be affected by the proposed development.

3.13 The waterways or drains described in section 3.3.2 of the Ecological Assessment were assessed as being of little ecological value. Though rural drains do not typically support high levels of biodiversity, this type of habitat does potentially support threatened fish species, such as the brown mudfish (*Neochanna apoda*), classified as ‘At Risk, Declining’. If this or other threatened species are present, the structure plan will need to make provisions within the design of the development to appropriately manage effects on this habitat.

3.14 A sighting of a New Zealand falcon (*Falco novaeseelandiae*) at the south end of Alexander Road is noted in the Ecological Assessment (section 3.4). There are also previous records of this species in the area which is classified as ‘Threatened, Nationally Vulnerable’ and is known to use pines and emergent trees as roosting and breeding sites. The Ecological Assessment recommends

the removal of mature pines on the lower slopes of the Southern Hills area next to Alexander Road (section 4.3).

- 3.15 GWRC recommends that no mature trees are cleared before a bird survey of the development area has been carried out to determine whether threatened species are using these trees as roosting or breeding habitat. If threatened bird species are present, effects on their habitat will need to be appropriately managed within the proposed development. Depending on the outcomes of the survey, habitat of threatened bird species would need to be protected by designing the development to avoid these areas or its loss otherwise mitigated.

(a) Providing for protection of significant indigenous vegetation

- 3.16 RPS policy 24 directs the protection of ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. This protection is to be achieved through policies, rules and methods in district and regional plans and until these are operational, policy 47 applies. Policy 47 requires councils to determine whether a proposed activity, such as a plan change, is appropriate by considering its potential effects. Most relevant to this case is that particular regard must be given to “avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats”.

- 3.17 The area for proposed development is an acutely threatened environment type described by the LENZ classification. This classification is applied to ecosystem types that have lost at least 90% of their indigenous vegetation and where relatively little is legally protected across New Zealand. RPS policy 23 recognises the ecosystems with less than 30% remaining to be of significant indigenous biodiversity value on grounds of their representativeness.

- 3.18 The proposed Plan Change identifies two areas designated as conservation covenants in the development area (section 3.1) and the proposal involves some changes to these areas. In general, GWRC supports the legal protection of areas with indigenous biodiversity values as an effective mechanism for ensuring these values persist in perpetuity. While the alteration of boundaries might be achievable without direct adverse effects, GWRC recommends that the total area of legally protected indigenous vegetation is at least maintained.

4. Relief sought

- 4.1 Should the Upper Hutt City Council approve proposed Plan Change 40 - Wallaceville, GWRC requests that:

1. The Alexander Road design provides safety for road cyclists by continuing an adequate on-road shoulder or cycle lane through to Ward Street. The currently proposed Alexander Road cross section suggests two 4.2m wide lanes with a 3m flush median and on-street parking on one side of the road. Given the risk associated with cycling in the door zone, a buffer zone or cycle lane between parked cars and cyclists could be provided (at the expense of a portion of the generous flush median for example).
2. In carrying out development and setting building floor levels for development, all flooding (i.e. the Probable Maximum Flood or PMF,

which is the 0.0001% Annual Exceedance Probability (AEP) event) should be avoided not just the 1% Annual Exceedance Probability (AEP) event.

3. Habitats of threatened indigenous species likely to be affected by the proposed Plan Change are assessed and provisions made for their protection as described above in section 3.26.
4. Further loss of an acutely threatened environment type is avoided by at least maintaining the overall area currently protected under conservation covenant.

5. Further involvement

- 5.1 GWRC recommends that the points as outlined above be considered. We would also welcome the opportunity to clarify and further discuss the matters raised.

GWRC does not wish to be heard in support of its submission.

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