

Friends of Taupo Swamp & Catchment (FOTSC)

NOTICE OF SUBMISSION TO PORIRUA CITY COUNCIL

RMA FORM 5 Submission on publicly notified Proposed District Plan Change Clause 6 of the First Schedule, Resource Management Act 1991

1 July 2020

Introduction:

FOTSC is a voluntary environmental group based in Porirua City. We exist in order to protect and enhance the special values of the Taupo Swamp, the Taupo Swamp wetlands, and the catchment it sits within.

We work with local, regional & national bodies, landowners & the community to advocate for this significant ecological site.

Our work includes community education & engagement through workshops, regular newsletters, our website and social media

<https://www.tauposwamp.org/>

We engage with the key parties who have an interest in future urban development within the catchment

We raise funds for, plan planting and manage the five+ year restoration of the Taupo swamp wetlands owned by Porirua City Council. We plan and manage the thousands of volunteer hours devoted onsite to this each year

We make timely submissions to local & regional bodies on concerns which may impact the FOTSC area

We manage a growing membership database which includes an advisory group across a range of fields of scientific expertise

This submission:

As the local 'go to' locally based group FOTSC has had an overwhelming interest and demand for information about the proposed Plan Change and its local, regional and national implications.

To cope with this we launched a dedicated page on our website, using just some of the questions which were coming our way <https://www.tauposwamp.org/plimmerton-farm-development>

It was clear to us that people were overwhelmed and daunted by the amount of information available via the PCC website and that the submission form was not very user friendly for some.

FOTSC is aware of many concerns coming from our members, so many in fact that we cannot address them all in this submission. They range across every issue raised in the PCC planning documentation. We are aware that other submitters will be covering points with more expertise and depth than FOTSC is resourced for at this point.

However, it is not only our members who have been approaching us - queries and feedback coming in from around New Zealand has been like an avalanche. There is widespread interest and concern felt about the proposed plan change and what it might mean for the development of that land now and into the future.

The FOTSC submission is concentrating on four overarching principles. *These are based around water, and around drainage systems within the Plimmerton Farm zone.*

Taupō Swamp and all wetland arms on Plimmerton Farm, along with Taupō Stream and all tributaries, are intricately connected as parts of a highly functioning ecosystem. Accordingly, for the purposes of this submission we refer to all these collectively under the term 'Taupō Swamp Complex'

Overview

The development of Plimmerton Farm and management of it will have effects on this system which in turn impact on the ecology of the area. All these effects will, in turn, affect the quality and ecosystem functioning of Te Awarua-o-Porirua Harbour. In our view, it is imperative that the downstream water and drainage effects from this development are positive and enhance the catchment and harbour ecosystem, especially the Taupo Swamp complex.

We note that strategic objective PFZ-O3 states that subdivision, use and development in Plimmerton Farm will contribute to high water quality of receiving waters including Taupo Swamp, Taupo Stream, Kakaho Stream and Te Awarua-o-Porirua. We applaud that objective however, community feedback is telling us that people want to see:

Our Points

1. All planning based on good information about the site in terms of its hydrology, biodiversity, flora and fauna. There are various studies and reports. Feedback tells us that they are inadequate for the purposes of evaluating possible impacts of the proposed development. We don't have enough good information. The Blaschke "Plimmerton Farm Plan Change- Ecological Assessment Report" formed the basis for the ecological and biodiversity provisions of the proposed plan change. We are hearing that it falls short in significant areas and is demonstrably inadequate for a development such as this. This is addressed in detail in submissions from Robyn Smith and QEII National Trust

FOTSC members tell us that:

- An acknowledgement of the regional significance of Porirua Harbour – not addressed in the above report
- Accurate delineation of wetlands in the Plimmerton farm zone – underestimated in the report
- The clearing of SNA's – this is not an option for FOTSC members, nor is any offsetting, nor is wetland creation to justify any such clearing.
- The proposed modification of wetland areas is unacceptable to members: some modifications in the plan are proposed for use to retain storm water, & to ensure storm water neutrality in the wider catchment. Some for roading (we hear, wide enough to take buses). We do not accept the inevitable loss of wetlands which will result, nor the resulting irreversible changes to connected water systems on that land
- Loss of spring fed seeps/streams at the top of valleys – these will be the most modified by development on the site. They are nationally recognised as endangered ecosystems

2. Our group wants to see evidence of the very best DETAILED plans as to how adverse effects of earthworks, loss of natural systems etc are going to be managed if the change to Residential and Commercial zoning is accepted by the Minister for the Environment

- We have already noted that strategic objective PFZ-O3 states that subdivision, use and development in Plimmerton Farm will contribute to high water quality of receiving waters including Taupo Swamp, Taupo Stream, Kakaho Stream and Te Awarua-o-Porirua. Community feedback tells us that people rate this very highly. Community discussion is telling us that people are not assured of this outcome given the questions they have about the clarity of mitigation and prevention measures seen in planning documents
- We are hearing concerns that there is lack of any detail on the required earthworks for development. We are also told that the extent of hard surfacing and change to the hydrological regime means the short and long term downstream effects on the Taupō Swamp Ecosystem cannot be quantified - and therefore it is not currently possible to determine the nature, scale and adequacy of preventative or remedial measures.

3. We want assurance that any consents / conditions set down for this development are not only at an optimum level, but that they are rigorously enforced at every step of the way by PCC and GWRC. With insights gained from current Porirua developments FOTSC sees non-compliance with agreed conditions as the major threat to the unique ecological systems within Plimmerton farm

- The development plans show no protection for the ongoing management of any infrastructure associated with newly build waterways ie culverts, stormwater retention ponds, flood attenuation ponds. Nor do they address the issue of the long term ownership & management of the structures associated with waterways. Feedback tells us that the community is very wary of these issues based on current observed development and consent practices in Porirua.

- Community and member feedback tells us that it is critical that any provisions around earthworks, and especially the sign off and application of Erosion and Sediment Control Plans, are followed, monitored and enforced by the Porirua City Council. Any non-performance to these requirements will have severe and possibly irreversible consequences on the wetland ecosystems in the Plimmerton Farm zone and, especially, on the Taupō Swamp Complex. We continue to hear & see worrying incidents of failures of sediment mitigation during construction and following rain events (Transmission Gully, Whitby, Kenepuru Landing, Aotea). Monitoring and enforcement services are ‘starved’ of resources which has meant that every major development in Porirua over the past 30 years has poured sediment into the harbour
- We are hearing that people want to see the freshwater management measures that are recommended in the Te Awarua-o-Porirua Whaitua Implementation Programme (WIP) implemented in the development planning where they fall within the jurisdiction of Porirua City Council and Greater Wellington Regional Council
- There is huge concern about a number of issues, based on current development practices in Porirua - the clearance of vegetation, modifying landforms by earth-working with associated discharges of sediment, and modifying hydrological characteristics of the catchment with hard surfacing, along with infilling and potential diversion of ephemeral and intermittent watercourses . Add to that the need for proven water sensitive design, and hydraulic neutrality that really does the job on that site. The community wants assurance that we get 21st century development, not 19th century thinking. They want the consent process to reflect that – from start to finish, and in perpetuity. They want the local environment to be a priority not a casualty of any development on Plimmerton Farm
- Community feedback tells us that no new development should be approved unless Porirua’s 3-waters’ infrastructure can accommodate it. There is community wide confusion about this issue, and real concern not only about the current ‘close to capacity’ infrastructure but who will pay for 2000 more households to connect to it

4. We have walked over that land. We want to be assured that the planning process will ensure that wetlands and streams, along with all agreed natural areas are protected in perpetuity, and enhanced where possible. We want to see the establishment of clear responsibilities for the ongoing care and management of such areas at the outset and into the future

- The development concept plans give no guarantee that important ecological sites will be protected. Nor is there any statement about the longevity of covenants, consents, or the long term stewardship of important sites. FOTSC has received a lot of concerned feedback about this.
- The long term lack of commitment of developers and ineffective conditions / serious monitoring of conditions imposed by Council means that any protection of ecological sites can often fail. How can a cash- strapped city like Porirua reassure us about the ongoing management of these?

FOTSC supports the submissions of Robyn Smith, QEII National Trust, PHACCT/GOPI.

**Judy McKoy (FOTSC project management)
& Bill McAulay (FOTSC Chair)**