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**Date:** 21 June 2024

**To:** Environmental Protection Authority

**From:** Te Awa-o-Porirua Catchment and Community Trust

**Contact:** Michael Player

**Submission: Plimmerton Farm Stage One Fast Track Consent Application**

Note: This submission is supported by the **Guardians of Pāuatahanui Inlet**.

**The Organisation**

The Te Awarua-o-Porirua Harbour and Catchments Community Trust (PHT) was formed to advocate for and foster understanding of the sustainable management of the harbour and its contributing catchments.

**Background**

PHT made a submission on the predecessor to this application: Plan Change 18 to the Porirua District Plan.

In it we made submissions on issues relating to stormwater, drainage and related attenuation mechanisms such as swales and wetlands, and on identification and management of natural features, such as wetlands. We observed that the urban development of Plimmerton Farm and the related management of it will have effects on the water and drainage systems and the ecology of the area. All these effects will, in turn, have potential adverse downstream effects on the quality and ecosystem functioning of Te Awarua-o-Porirua Harbour - a taonga to Ngāti Toa and a marine ecosystem that the Greater Wellington Regional Council deems to have high ecological and cultural values. In between the proposed Plimmerton Farm Stage 1 development and the harbour lies the ecologically and nationally significant Taupō Swamp. We understand that some of the Stage 1 development will drain into the swamp. In our view, it is therefore imperative that the downstream water and drainage effects from this

development are positive and enhance the catchment and harbour ecosystem, especially the Taupō Swamp. Cumulative effects caused by construction, especially earthworks, and subsequent development and use need to be carefully managed and monitored in order to avoid and minimise adverse effects on the catchment and harbour ecosystem.

These key issues are at the centre of this submission.

## **1 Wastewater Management**

It is vital that this source of potential contamination is carefully managed and closely monitored.

We note that (4.6.2) there is no public wastewater drainage on the site and the existing pump station at the Plimmerton Roundabout has limited capacity. Clearly the effective collection, disposal and treatment of sewage is of critical importance and we ask that proposals for this are closely scrutinised both technically and financially.

## **2 Stormwater Management**

4.6.3 notes that stormwater from the site discharges across SH59 through various culverts. The origins, treatment and eventual discharge of stormwater from the site is critical to the condition of both the Taupō Swamp and, ultimately, the harbour.

We strongly support the application of Water Sensitive Urban Design, as proposed in the application and, with it, hydraulic neutrality. We support the proposals in 625 and note that these include streetscape bioretention. This will enable swales to be developed.

We further support the system of rainwater storage tanks at a property level and consider these must be mandatory and, of course, be complemented by environmentally compatible downstream mechanisms such as swales to intercept residual run off and ensure the remaining water is appropriately treated, including filtering through restored wetland areas, before any discharge off the site.

## **3 Wetlands and Ecological Values and Issues**

Section 3.4 of the Ecology Assessment points out the network of streams and, especially wetlands, and points out the importance of water quality and quantity entering the downstream Taupō Swamp complex, the Taupō Stream and the Te Awarua-o-Porirua Harbour.

We understand that barely 2% of the original wetlands and seeps remain in the region and these support remnant flora and fauna. It is therefore critical that wetlands and seeps on the site are fully protected both during and after development and their gullies are not used as fill for earthworks.

We consider that all remnant wetlands and their contributory seeps not only need protection but must have bordering buffer areas to add to that protection. Pest and weed control are also essential to maintain these areas as is stock management while development areas are still in pasture.

The remnant wetland areas and indeed any remnant bush areas need to be supported by a programme of planting and managing suitable native vegetation, along of course with appropriate pest and weed control.

We have some reservations about the proposed dam for flood retention and the development of a wetland. While we support such measures in principle, we consider that this proposal needs careful engineering and hydrological assessment before anything is finalised, much less approved. In the event of overtopping and failure, the 7-metre-high dam poses risks to the downstream urban catchment and hydrology.

#### **4 Earthworks and Disposal**

8.3.4 says that Stage 1 development will produce 2 million cubic metres of earth over 60 hectares of land. This large movement of spoil poses risks to the site and downstream catchment. Its careful management and, especially, consistent compliance monitoring and appropriate enforcement is vital to reduce this risk.

Unfortunately, our experience of earthworks management and compliance in the Transmission Gully project was abysmal, with poor management and inadequate compliance and enforcement leading to thousands of tonnes of sediment entering the Pāuatahanui Inlet.

We cannot risk a repeat of this debacle on this site given its proximity to the Taupō Swamp and Catchment. Therefore, and while we understand compliance and enforcement is not a matter that cannot of itself be a consent condition, we urge the resulting decision ensures that earthworks and spoil disposal conditions are carefully and clearly specified so as to ensure any sediment and contaminants do not adversely affect wetland and water systems, their ecology and their environments.

We assume compliance monitoring and related enforcement will be the responsibility of GWRC and PCC and we urge the Panel to ensure those organisations commit to close and consistent compliance monitoring especially earthworks and spoil disposal which will principally be the responsibility of GWRC.

**Michael Player**

Chairperson

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