



caring about you & your environment

11 May 2001

**Hutt River Floodplain Management
Advisory Committee**

**Meeting to be held on
Thursday 24 May 2001 at 9.30am**

Supplementary Order Paper

Schedule of Submissions

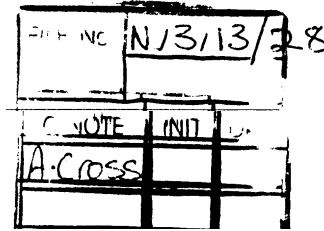
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| Submission 6..... | Angus Gibb |
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| Submission 8..... | Residents of Hathaway Avenue |
| Submission 9..... | Winstone Aggregates |
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Submission 1

Alistair Cross

From: Jack O'Kane [JACKOK@paradise.net.nz]
Sent: Monday, 2 April 2001 13: 15
To: alistair.cross@wrc.govt.nz
Subject: Submission- Consultation Draft



Alistair,
Regarding the letter addressed to Jack O'Kane, Kaumatua Tramping Club c/- 11 Moehau Grove, Trentham, Upper Hutt.

I have looked at the WRC web Site and from there got into the "Consultation Draft."

Considering the Items listed to assist in making a submission,

1. The Plan does make sense.
2. The Plan has all the information needed.
3. Is the Plan cohesive? The plan is very lengthy. Too long 243 pages. It brings to mind the WRC 10 year plan. This consisted of 2 volumes. Volume 1 had very little substance and one had to get into Volume 2 before you found worthwhile information.
4. The language is not complicated.
The information should have been presented in a more concise manner.
5. The information is easy to understand.
7. The maps and diagrams are helpful.
8. The plan will be useful.

I should point out the above comments are mine. The Kaumatua Tramping Club is involved as an organization, although many Club members will be interested on a personal basis.

In our situation we live close to the river and take comfort in the fact that there is a stop bank between us and the river.

I am grateful to the engineering staff of the WRC responsible for flood control
We cannot complain about not informed about what is going on!
The WRC have provided lots of information.

Yours Sincerely
Jack O'Kane

Submission 2

Hutt River **Floodplain** Management Plan: Consultation Draft

Submission Form

Name Grant Dixon Address 3 Kekeru Cr.
Lower Hutt
 Phone 569-3452

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- Is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful?
- Will the Plan be useful?

Contact Alistair Cross at the Regional Council for information: phone 384-5708
 email Alistair.Cross@wrc.govt.nz

Your Submission



In somewhat surprised to gain so little information from your Issue No.6. - Is this good use of money? Surely a 3 or 4 page 'summary' of the 'Consultation Draft' would be better than telling us what we already know! For instance I still don't know what's being done to repair the Mano, Park Golf Course, - the photo suggests something, but I've heard it has largely been untouched? This is an "information" opportunity - please give it next time. Thank You. Grant Dixon. ph 569-3452



See the flip side for Regional Council **FREEPOST ADDRESS**

3 Kekeru Cr., Lower Hutt.
 caring about you & your environment

Submission 3

Hutt River Floodplain Management Plan: Consultation Draft

Submission Form

Name Ashley Pointon Address 26 Fenchurch Grove
Stokes Valley
Phone 025 265 8395

These questions might help you consider a response:

- Does the Plan make sense? *The flip side does, severely lacking in specifics for the environment improvement*
- Does the Plan have all the information you need? *No*
- Is the Plan cohesive? *Technically, Yes*
- Is the language complicated? *No*
- Is the information well presented? *The info available is*
- Is the information easy to understand? *Depends on the age of the reader*
- Are the maps and diagrams helpful? *Spore so*
- Will the Plan be useful? *Who knows*

Contact Alistair Cross at the Regional Council for information: *phone* 384-5708
email Alistair.Cross@wrc.govt.nz

Your Submission *The engineering aspect of the draft management plan appears sound and well presented, my concern is regarding the so called environmental improvements which I believe is a subtle way of denying the public their vehicle access rights to their public estate.*

I would like the "vehicle restriction" and "controlling of vehicle access," to be removed from the plans, text and policy and the areas more recently closed off to be returned to full 24hr 7day right of access.

I accept the need to prohibit vehicles from riverbank that is open to golf links or sport fields but the few remaining portions of this floodway should remain open and available to all forms of recreational pursuit not for the select few.

There is also a need to maintain the vehicle tracks that

See the flip side for Regional Council FREEPOST ADDRESS



Submission 4

12 APR 2004

Hutt River Floodplain Management Plan: Consultation Draft,

Submission Form

Name ALAN POPE Address 6 MUDIE STREET
ALICE TOWN
LOWER HUTT
Phone 586 1258

N 313 28

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- Is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful?
- Will the Plan be useful?

| | | |
|-----------|--|--|
| TO DO | | |
| B. POPE | | |
| A. CROSS | | |
| | | |
| | | |
| | | |
| TO ACTION | | |
| | | |

Contact Alistair Cross at the Regional Council for information: phone 384-5708
email Alistair.Cross@wrc.govt.nz

Your Submission

After reading the draft plan I felt that it was well presented and informative. However I feel that some further detail of the intended works is required.

I would like to see a diagram showing the cross section of the size of the new stopbank, instead of the current footnote profile.

I would also like included drawings showing comparisons in size & shape of the new stopbanks in relation to the existing ones. (Ara to Ewen stretch).

I would have liked some of the terminology explained throughout rather than leaving it in a glossary, which was not listed.

See the flip side for Regional Council FREEPOST ADDRESS



Submission 5

12 APR 2001

Hutt River Floodplain Management Plan: Consultation Draft

S&mission Form

Name B. J. Bruce Address 116 Kaitiaki Rd
Palmerston North
Phone (04) 5891817

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- Is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful?
- Will the Plan be useful?

11/3/13/28

| | | |
|----------|------|----------|
| NAME | DATE | RESPONSE |
| S. PAUL | | |
| A. CROSS | | |
| | | |
| | | |
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| | | |
| | | |
| | | |

Contact Alistair Cross at the Regional Council for information: phone 384-5708
email Alistair.Cross@wrc.govt.nz

Your Submission

The plan does make sense, & seems to cover the long term maintenance & safety of the Hutt River floodplain.
The work as planned should take place.

Your plantings are making the river banks attractive as walking areas.

I do not wish to be heard

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Submission 6

N/3/1 3/28

TUE 17TH APRIL 2001

WELLINGTON REGIONAL COUNCIL
17 APR 2001

MR ANGLUS GIBB
16 TIRANGI RD
MOERA 6009
LOWER HUTT NZ.
TEL: 5687-309

| NAME | (N) | (S) |
|----------|-----|-----|
| B. Paul | | |
| H. Cross | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

TO: RIVERS DEPT & WRC
HUTT RIVER FLOODPLAN SUBMISSION
CONSULTATION DRAFT MANAGEMENT PLAN

P/S { Tirangi Rd - ~~STATION~~
have a separate
Stormwater Outlet!

Dear Councilors,

This is a "Mind" Submission in addition to my very large Submission; re 1998 Floods of October that Yr. Please "Lend me your Ears" thankyou.

First, thankyou very much for implimenting some of my suggestions in repair of flood damage, to part of the stopbanks in our area etc; near Estuary Bridge etc. I am still a bit concerned about the state of the Stormwater outlets into the Mutt River in our area (Outlets.) I do hope MCC will get more 'Flaggate Non Return', Secondary Manual Valves fitted etc; ASAP. I strongly feel that these Stormwater outlets should be angled into the direction of flow of the River etc; to help drainage of our area; especially in flood conditions. Backupe

It was very nice to meet some of you at Glen Iris Tennis Club Meeting RE: Ava to Ewan Project. I accept the Management Plan put forward for this area; & consider it to be a Priority, etc. Also, I would like to see some dredging of River Shingle done; just south of the Ava Train Bridge, towards the Sladden Park Boat Ramp Estuary; including the Estuary itself etc.

I understand that River Stopbank Alignment Work, outside Randwick Park Industries etc (Behind us); will be undertaken sometime in the future. Hope that will not make the Mutt River more dangerous for us; as at present; I think it gives us some protection. With accelerating Global Warming & large hole in Ozone Layer; I would like to see the height & strength of Stopbanks increased down our way; especially as the proposed work up river; will undoubtedly bring more water down our way; which will have no where to go, when the Tide comes in. (The Ave Train Bridge area is higher in Sea Level than Estuary Bridge Area.) TransRail should come to "The Party" & Modify their Bridge. What about "Self Aligning pontoons"?

YOURS SINCERELY, ANGLUS GIBB. (RATE PAYER.) ("JESUS IS LORD").

Angus Gibb

Submission 7

Submission 8

Three pages plus attachment

Date 10th April 2001

A submission on the WRC Consultation Draft – March 2001

By the Residents of Hathaway Ave bordering on the Boulcott Golf Course

There is a fundamental error in the approach that has been made in this document. There is a definite orientation to a COMPLETED plan when we have been assured time again that this is not so.

At the meeting held in the Hutt Golf Club rooms Brendan Paul stated the WRC would consider options for the works in this vicinity when it begins detailed design. He also stated that his preference was for a **stopbank** with flat batters to meander through the course and to be landscaped into the course. This preference was also stated by the chairman Stuart McCaskill at a WRC meeting Barry Jenness attended and again at a meeting held at the Belmont Memorial Hall on the 2nd April.

The maps shown in:

- Chapter 1,
- Chapter 2 following page 40 and page 66
- Chapter 5 Table 7
- Appendix 4 river corridor maps

all show an assumption that the protection will be hard on the east side of the Boulcott and Hutt Golf courses.

The language and maps all point to a plan that has supposedly been finalised in detail and certainly there are sections that speak about consultation but there is no indication that this applies to the Boulcott reach.

For instance:

The “Executive Summary” states under “What the Plan Does”

“ Putting it simply, the Plan records where we have come from in developing measures, and tells you where we are going in implementing them.”

and

Chapter 1 section 2.1 states

“Formulating and implementing this Plan follows 5 phases, described in fig 2.”

Combined with the information in chapters 2 and 5, and appendix 4 maps are stating that it has been done and also infers that preliminary design and costings have been done.

SUBMISSION

We would submit that the wording be modified in the document to state very clearly what we have been told and that maps be modified to show
the preferred option, that of a **stopbank** with fiat batters meandering through the golf courses and landscaped into the courses
and
a diagram modified from the original diagram. (copy attached)

We would also suggest making reference in the document that the option of a **stopbank** incorporating Harcourt **Werry** Drive has been considered by WRC, but until costing has been done a final decision cannot be made.

Also a table should be inserted into chapter 2.2.2 that gives the expected time frame for the final consultations, preliminary design work and resource consents for each section of the programmed works.

Other Comments

Glossary and-Definitions

The definitions of some of the terms used are not all covered in the Glossary. Chapter 4 – the two footnotes are not covered fully in the Glossary Page 2. The description given for the 2300 cumec flood is good but gives no comparison with a 1900 or 2800 flood. All this information is available in your publications but we found it confusing having to jump from one document to another and difficult to remember where we had read information that linked with flood levels. The Glossary on this subject needs to link back to Table 1 in chapter 1. See also the footnote Chap 4 page 106.

Refer also the footnote in Chap 2 page 34 not defined in the glossary.

Also the Interpretation of “Buffer”

“Executive Summary” and Chapter 1

The first section called “Executive Summary” on the second page needs an appropriate title, page viii moved to page i (page i thrown out). The pages numbered instead of Roman Numerals.

We would like to see the “Contents” at the back of the “Executive Summary” moved to the front and the Appendices added as part of the “Contents”

These two sections appear to be introductions, perhaps they should be merged.

We find Chapter 2.2.2 when related to the table following page 29 confusing. We have already discussed this with Alistair Cross.

Abbreviations

Chap 4 - Page 134 -what are LIMS and PIMS.

They sound like two versions of a drink. We would agree that the use of WRC, HCC and UHCC can be used as suitable abbreviations but we found, and we would think the general public also, that most abbreviations cause a halt in the reading flow and frustration of the readers.

As this document is for general public consumption, to make it easier to read we would suggest that apart from WRC, HCC and UHCC, abbreviations be eliminated completely.

Channel Management

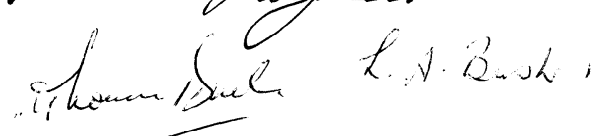
We are strongly supportive of the decision to proceed with gravel extraction in the Boulcott reach.

Finally we would like to compliment the WRC staff on the amount of work that has gone into this extensive document. It is not easy to gather information from many sources and produce a cohesive document.

Barry & Phyllis, 26a Hathaway Ave
567-0544



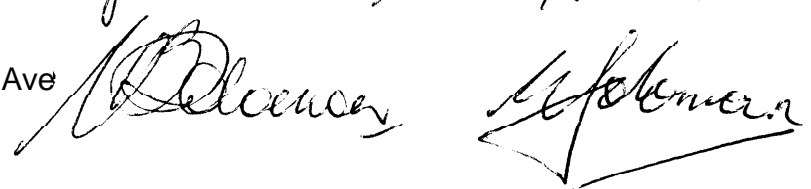
Richard & Lois Bush, 24a Hathaway Ave
567-9104



Andrew & Sue Colson, 28 Hathaway Ave
567-7239



Gary & Marlene Solomon, 22a Hathaway Ave
567-3888



Abbreviations

Chap 4 - Page 134 - what are LIMS and PIMS.

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Barry & Phyllis, 26a Hathaway Ave
567-0544



Richard & Lois Bush, 24a Hathaway Ave
567-9104

Richard Bush L.A. Bush

Andrew & Sue Colson, 28 Hathaway Ave
567-7239

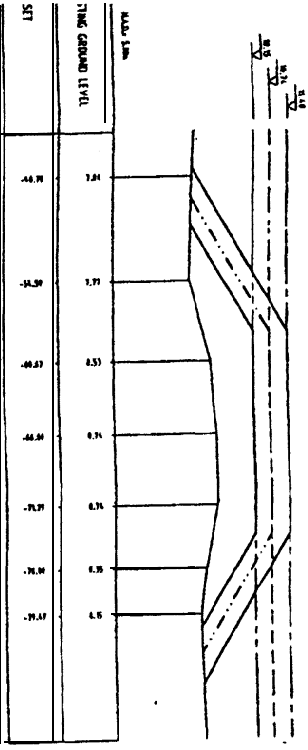
Andrew Colson *Sue Colson*

Gary & Mariens Solomon, 22a Hathaway Ave
567-3888

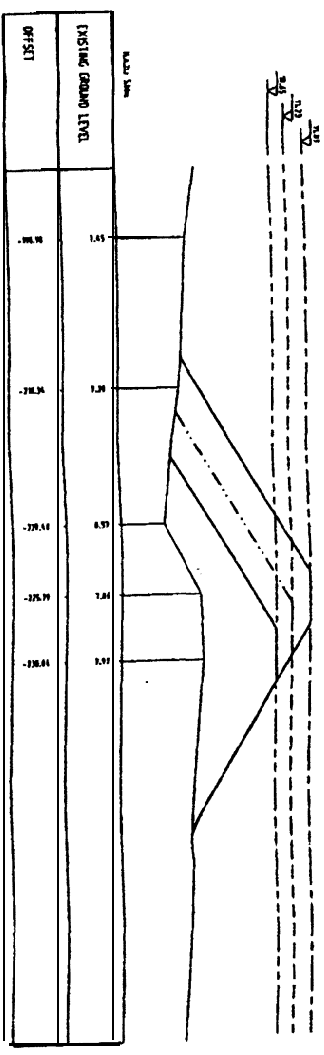
Gary Solomon *Mariens Solomon*

Bill & Pam Perkinson
30A Hathaway Ave.
00617 5537 8169

Bill Perkinson *Pam Perkinson*



SECTION 0520 A
DISTANCE 037470



SECTION 0550 A
DISTANCE 0284312

LEFT BANK
(GOLF COURSE)
CROSS SECTIONS

NOTE: SECTION 0550 ON THE SHADERS
ALTERNATE ALTERNATIVE THAT ARE
ALTERNATIVE TO THE SHADERS
SECTION.

FOR INFORMATION

| | | | | | |
|---|--------------------|--|----------------------|---|-----------------|
| Beca Carter Hollings & Ferner Ltd. Consulting Engineers | | HUTTY RIVER FLOODPLAIN MANAGEMENT PLAN | | UPGRADED STOP-BANK SOLUTIONS - SHEET 25 EVAN PARK - KENNEDY-GOOD BRIDGE | |
| PROJECT NO. 34016.72 / 0025 | DATE 30/01/2025 | DRAWN BY [Name] | CHECKED BY [Name] | SCALE AS SHOWN | SHEET NO. 25 |

Submission 9

Submission 10

Hutt River Floodplain Management Plan: Consultation Draft ,

Submission Form

Name Western Wood Committee **Address** Hutt City Council

Chair: Tu Berridge

Phone Home - (04) 566 8781

These questions might help you consider a response:

- Does the Plan make sense? ✓
- Does the Plan have all the information you need? ✓
- Is the Plan cohesive? ✓
- Is the language complicated? ✓ no
- Is the information well presented? ✓
- Is the information easy to understand? ✓
- Are the maps and diagrams helpful? ✓ yes
- Will the Plan be useful? ✓ yes

Contact **Alistair** at the Regional Council for information: *phone 384-5708*

email Alistair.Cross@wrc.govt.nz

Your Submission

as attached.

See the flip side for Regional Council **FREEPOST ADDRESS**



caring about you & your environment

SUBMISSION ON:

HUTT RIVER FLOODPLAIN

Management Plan

For the Hutt River and its Environment
2001

WELLINGTON REGIONAL COUNCIL

presented by the
Western Ward Committee
Lower Hutt

16 April 2001

Background

The Western Ward Committee wishes to further acknowledge the professional and dedicated manner in which the Wellington Regional Officers and Councillors have conducted themselves throughout the consultation phases of this project, thus far.

Introduction

The WWC commends the Environmental Strategy of enhancing the Hutt River's environment "over time, according to a preferred blueprint for its future use and development ." In its canvassing of residents, the committee discussed the plan with an engineer who appeared extremely satisfied with the quality of the plan overall.

Objectives (1. 3.3)

The plan's five objectives are agreed to in principle by the committee. However, there are areas concerning their implementation which are highlighted next in this submission and the committee would like to see these concerns addressed.

Flood Protection (2)

Reach 3 (2.3.3)

a. Stormwater Build-Up

a.i.As well as a physical protection of the river, there is a wider issue involving the transitional authorities, that is Hutt City Council, in that there is a need for the TA to deal with stormwater build-ups:

- ◆ this may require additional pumping, eg at Pharazyn Street.
- ◆ ensure there is a high level of emergency management in vulnerable areas

WWC looks forward to the completion of the bank edge near Block Road. If this bank edge is not protected, our access to an entrance to Hutt City will be at risk:

- WWC notes the discussion of a plan (in a consultation meeting) to put in secondary valves to prevent the **backflow** bubbling out in Pharazyn Street. This is presently causing concern to Pharazyn Street residents. The stormwater flapbacks block with debris in rainy conditions. This counter-measure does not appear to be written into the plan.

- The fact that Block Road closes in minor flooding is an inconvenience to residents of the city and it affects the Western Ward residents as a major thoroughfare for them.

a.ii. The current upgrading of State Highway 2 by Transit, particularly in Phase Two of the planning, needs to incorporate this problem and any solution designed needs to be formed by both WRC and Transit. As such it needs to be part of the design criteria in Transit's planning. WWC would like some reassurance that this communication has occurred between both parties.

WWC commends all other proposals in this Reach.

Reach 4 (2.3.4)

Boulcott Reach

Reach protection needs to be implemented and a **stopbank** built for Hathaway Avenue. We note the latter is currently under consideration.

Firth Park

WWC looks forward to the recreational and environmental improvements that will ensue from the removal of Firth Park.

WWC commends all other proposals in this Reach.

Reach 5 (2.3.5)

Belmont Flat

Good edge protection needs to be implemented, not **stopbank** protection as the residents have expressed this view. The piling of 2-3 houses is an option if the householders seek it.

WWC views as urgent, and a number one priority, to remedy, immediately, the riverbank erosion where it has occurred. Carter and Owen Streets in the Belmont Flat area need river edge protection at the Block Road end, where there is a gap in the flood wall protection.

WWC commends all other proposals in this Reach. A general observation was made that in the area next to Kennedy-Good bridge where people walk their dogs, that vehicles should not be permitted to access all areas. Some areas should be pedestrian only.

Another observation was made that the private land behind Belmont Hall should be purchased by WRC as a matter of priority.

*Reach 6 (2.3.6)*Manor Park

There are concerns for the houses in these areas:

- ◆ There is a need for survey work to identify the floor level of the houses most at risk, and a consultation with the affected residents should discuss remedies eg house lifting may be the cheapest option available in the case of the Manor Park area.
- ◆ the local authority must ensure it has adequate Emergency Management Planning for these areas
- ◆ that buildings are checked in relation to their degree of vulnerability to the flood threat

The stop bank system needs to be completed so that housing has the appropriate level of protection. This is proposed to be priority 29.

WWC commends all other proposals in this Reach.

Conclusion

As there is no financial difference for rating between the 24 or 28 cumecs, then it appears sensible to opt for the 28 cumec protection level, if the level of 24 cumecs is chosen. The committee continues to maintain that a better level of protection is always the better option in the long term.

As this involves a significant rating burden to the ratepayer, there should be careful co-ordination of rating costs with other projects, to ensure the ratepayer is not hit all at once.

There was general support for the planning approach and a commendation for the consultation process which has exceeded all professional expectations.

END

Submission 11

ADD 2004

Hutt River Floodplain Management Plan: Consultation Draft

Submission Form

Name Combined Horse Clubs
of Upper Hutt INC.

Address C/- 58 Ward St
Upper Hutt

Phone (04) 972-7786

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- Is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful?
- Will the Plan be useful?

Contact Alistair Cross at the Regional Council for information: phone 384-5708

email Alistair.Cross@wrc.govt.nz

N: 3 B: 28
 C N/3 13/28
 B. Paul
 A. Cross

Your Submission

attached is the submission from the Combined Horse Clubs of Upper Hutt.

We would be grateful if you give this your consideration.

As you will appreciate we are very concerned about the future of the land we use to graze our horses.

See the flip side for Regional Council FREEPOST ADDRESS



caring about you & your environment

COMBINED HORSE CLUBS OF UPPER HUTT INC

58 Ward Street
Upper Hutt

Phone 972-7786

April 16, 2001

COMBINED HORSE CLUBS OF UPPER HUTT INC - GRAZING LAND UPPER HUTT

When the Wellington Regional Council called for submissions **from** the Public for proposed uses for the river area, our club submitted what we would like to see for the **future** use of the area we **occupy**.

A copy is enclosed for your **information**.

As stated **in** the earlier submission., we are a Sports Club and as such deserve the same considerations as other sports **clubs**. **One** only needs to **look** across the other side of the road **from** our grazing land to **see** the **discrepancy** in the treatment our sport gets in comparison to others in Upper **Hutt**.

For us to continue our **sport**, which involves horses, we **require** land to be set aside for us to **graze** our horses.

The Upper **Hutt** City Council and Wellington Regional Council have very kindly set. aside land for Pony Club activities and Adult Riding Club, but these are riding facilities - not grazing which is as, if not more, essential.

We are keen to have our small area set aside for permanent horse grazing so we can make long term management plans for the area. At present maintenance etc is done in a patchy way because we have **no** permanency and as such are reluctant to outlay large financial sums. **If the** area could be considered permanent grounds for the Combined Horse Clubs of Upper Hutt inc then we would like to liase with **the** Wellington Regional Council to devise a management programme involving the application for grants for us to upgrade the facilities such as **fencing, upgrading** of paddocks, water reticulation etc.

The Combined Horse Clubs of Upper Hutt Inc was formed in 1980 by a group of horse enthusiasts who were concerned about the ever decreasing **amount** of grazing land available in Upper Hutt. They negotiated with the Wellington Regional Council for the lease of the land on the south side of the **Totara** Park Bridge - the **area** still used by the club. At this stage this land was covered in dense scrub which took a huge effort both financially and in time to clear. Today, thanks to the efforts of the first members (some of whom still graze their horses there) the land, while still not **perfect**, has been cleared, **fenced, and maintained** into **some quite** passable horse grazing land. **Today** members still work **very** hard to keep their **grazing** and **try** to make it into something to be proud of

All this work was, and is continued to be done **by** members with no help either financial or practical **from** any other party

Enclosed also is a copy of our Club Rules. As you will see the Club was set up with the idea of providing not only grazing for its members, but also as a place where horse activities could be arranged “to promote the interest of horse care and well being and general advancement of equestrian sport”

This aspect has unfortunately not been **persued** mainly through lack of facilities and funds to improve what facilities we have at present.

Once the area is permanently set aside for horse sport our club would like to work with the Wellington Regional Council to see the followong improvements:

To undertake a comprehensive clearing of all noxious weeds.

The club spends a great deal of time and money on sprays to keep the ever present blackberry, gorse, broom and ragwort at bay. This is at present done with each member responsible for the spraying of their own grazing area . We would envisage working with a representative of the WRC or with someone recommended by them to undertake this in a more organised and economical way.

To improve the quality of the grazing by upgrading the land on which our grass is growing.

It is no secret that the land we use is of very poor quality.

The club undertakes annual **fertilising alternated** with liming.. Proper analysis of the soil will enable us to apply the **fertiliser** best suited to the **requirements** of the soil.

I realise this could be a **costly** item and could be scaled to meet the requirements and the **finance** available. Consultation is required here.

To upgrade existing fences

Once again we maintain our fencing with each member responsible for their own fencing. This has led to a variety of fence standards. We would like to see at least our boundary fences replaced to a **high standard**

We would also like to see the **front** paddock near the **Totara** Park Bridge developed as more of an all weather riding area, much the same as has been done for the Adult Riding Club in Te **Marua**. With this we could expand on the area for use as a riding facility . There is already plenty of parking area and with its location near the State Highway, people **from** other areas would have no problem finding it.

We feel that with the development of the **Witoka** estate just on the other side of the Stop Bank our proposal would fit entirely with the character of the area - one which the Upper **Hutt** City Council seems keen to foster. It is interesting to note that the **opening** scene for a TV commercial advertising a new Upper Hutt Subdivision as a **lifestyle** choice, shows two people on horses, galloping over an open area typical of what is available in Upper **Hutt**.

Also with **ready** access to many miles of hill tracks, riders can **enjoy** a days riding without ever going near the bad. This is **certainly** something that should not be **taken** lightly as the **increasing** volume of traffic on our city roads puts horse riders at considerable risk.

We feel that this land is already serving a suitable and useful function and only needs enhancing **in** its present role to be an area Upper **Hutt** can take pride **in**. We have undertaken a **casual** survey

of people who use the area **reguarly ,not** only those involved in horses, but locals and those who actually drive there to walk their dogs in one of the last easily accessible unspoiled areas in Upper **Hutt**. The general opinion seems to be that they are **perfectly** happy with it being used as it is and would resist any change

We feel that we should comment on the idea of making the area into a “wet land” **With NZ** under threat **from** certain mosquito species, it would seem madness to create an environment perfect for the breeding of **mosquitoes** and **sandflys**. Surely the **people** of **Totara** Park and Witoka would not be very impressed with anyone who put this on their doorstep.

Our Club is growing, with new members joining all the time. For us to continue with our sport and in the interest of Horse Sport in Upper **Hutt**, we would ask that you give this submission some serious consideration. We look forward to working with you in the **future**.

Janine Weame
President
Combined Horse Clubs Of Upper **Hutt Inc**

1ST Submission

Combined Horse Clubs of Upper Hutt
C/-58 Ward Street
Upper Hutt
(04) 527-7786

Thursday, 9 December 1999

The Combined Horse Clubs of Upper Hutt lease a block of land adjacent to the Totara Park bridge. The area is approx 20ha and would otherwise be set aside as flood plain. We have cleared this land, fenced and maintained it as a club and provided grazing for approx 25 horses. For the owner of these horses, riding is their sport of choice and availability to grazing is imperative to their continued involvement.

From this area we have limited access to the forestry tracks of Cannon Point and the existing horse trail along the river reserve. We feel this is entirely in character with the recreational use envisaged by the WRC for the river reserve.

With the increasing development of Upper Hutt and therefore the reduction in areas to ride, it is becoming increasingly important that those in Upper Hutt who choose horse riding as their sport have access to safe and enjoyable spaces.

While the riding and access to suitable tracks is very important to us-continued access to grazing area is also imperative as the care of the horse is a large part of the leisure activity of horse sport.

With the recent development of the Waitoka Estate on the other side of the stopbank, having the paddocks where they are fits the character of the area. As well as providing grazing for the horse owners, this area, in the form it is at present provides a wonderful leisure area for the residents of Totara Park who wish to let their dogs run in a safe natural place. Children play along the stream and have contact with animals and nature usually unavailable to 'city' children.

For these reasons we would like to see continued access to land set aside for grazing and a broader network of safe pleasant bridle paths running along the river reserve.

Thankyou for your time

Yours Sincerely

J Weame
President of Combined Horse Clubs Inc.

RULES OF COMBINED HORSE CLUBS OF UPPER HUTT SOCIETY INCORPORATED

NAME

1. The name of the Society shall be Combined Horse Clubs of Upper Hutt Society Incorporated, hereinafter referred to as the Society.

OBJECTS

2. The objectives of the Society shall be:-
 - (a) To promote the interest of horse care **and** well being and general advancement of equestrian sport.
 - (b) To purchase, lease or otherwise acquire land, clear, road and fence land for the keeping and grazing of horses.
 - (c) To borrow, raise money or secure the payment of money owing or the satisfaction or performance of any obligation or liability incurred or undertaken by the Society as the Society may think fit and in particular by the issue of debentures or by mortgage or charge or lien upon the whole or any part of the Society's assets (whether present or future) and to purchase redeem or pay off any such securities.
 - (d) To construct, maintain, alter, improve, enlarge, pull down , remove or place manage and control any lands likely to advance the Society's interest directly or indirectly.
 - (e) To effect insurance against risk of loss to the Society by fire or accident earthquake or otherwise howsoever.
 - (f) To invest the funds of the Society in real or personal property in such manner as the Society shall think fit: and
 - (g) To do all such things as are incidental and conducive to the attainment of any of the above objects.

MEMBERSHIP

3. Types of membership in the Society shall consist of
 - (a) *Ordinary Membership*. Individuals 18 years and over.
 - (b) *Family Membership*. Parents together with children under the age of 18 years.
(Children 18 years and over take out *Ordinary Membership*)
 - (c) *Junior Membership*. Individuals under the age of 18 years.

4. Every person wishing to become a member of the Society is to submit an application in writing to the Secretary. Such application is to be supported by an existing financial member of the Society.
5. The Executive Committee will consider all membership requests and will determine when each applicant may be accepted into the Society. The Executive Committee will also determine the fees payable on joining.
6. All financial members aged 18 years and over are to be counted when a quorum is being decided and all are entitled to vote on any motion put to a meeting of the Society. Members under the age of 18 years may participate in the deliberations of the Society but will not be eligible to cast a vote nor will be counted towards a quorum.
7. The Annual General Meeting of the Society shall have the power to expel any member from the Society for any cause that may appear to warrant action. Any person ceasing to be a member from any cause whatever, or any successors or representatives of such person, shall forfeit all interest in the property of the Society, and shall have no claim thereon.
- a> No member or person associated with a member of the organisation shall derive any income, benefit of advantage from the organisation where they can materially influence the payment of income, benefit of advantage.

FEES AND SUBSCRIPTIONS

ANNUAL SUBSCRIPTIONS

8. An Annual Subscription is payable by all members of the Society. The amount of this subscription will be fixed from time to time at an Annual General Meeting of the Society, and if not so fixed will be the amount payable for the previous year. The Annual Subscription will become due and payable on the first day of September.

| | | |
|----------------------------|---------------------|--------|
| <i>Ordinary Membership</i> | Annual Subscription | \$4.00 |
|----------------------------|---------------------|--------|

| | | |
|--------------------------|--|---------|
| <i>Family Membership</i> | Each parent, one Ordinary Subscription. | |
| | Each child, half any Ordinary Subscription | \$10.00 |

| | | |
|--------------------------|--|---------------|
| <i>Junior membership</i> | | \$2.00 |
|--------------------------|--|---------------|

9. Any member whose Annual Subscription is unpaid shall not be eligible to vote at any meeting of the Society nor will they be eligible to nominate or second members for office in the Society. Non -financial members will not be eligible for election to any office within the Society.
- 10 The Executive Committee may strike from the list of members any whose Annual Subscription is more than one year in arrears, and thereupon such person will cease to be a member of the Society.

GRAZING BOND

11. A refundable Grazing Bond is payable by members allocated grazing rights. The Bond is based on the number of grazing allocations granted. The Bond is \$50 (fifty dollars) per allocation. The amount of the Grazing Bond will be fixed from time to time at an Annual General Meeting and if not fixed shall be the amount previously fixed.
12. The purpose of the Bond is to provide the Society with working funds to maintain the property and equipment that is the collective responsibility of the Society.
13. The Grazing Bond will be refunded when a member leaves the Society, provided always that the Society reserves the right to reimburse itself from the Bond for any outstanding debts to the Society of the member.
14. Any member who owns a Grazing Bond on a paddock but does not graze it themselves at all for a period of two years ie a fully subleased paddock, is to give up the paddock. The member is to be approached three months before the time is up, to be asked their intentions regarding their future use of grazing.

GRAZING FEE

15. A monthly Grazing Fee is payable based on the assessed grazing capacity of the area allocated to members. The Grazing Fee is levied at the rate of twenty dollars (\$20) times the grazing capacity of the area allocated.
16. Grazing fees are to be paid to the Society by automatic bank transfer.
17. Any member whose Grazing Fees are three months or more in arrears shall not be eligible to retain membership of the Society.

TRANSFER OF GRAZING ALLOCATION

18. Recovery of the cost of any improvements made by a member to a grazing allocation is a matter for negotiation between the outgoing and incoming members.

SUB LEASING of GRAZING ALLOCATION

19. Members granted grazing rights may only sub-lease part of these rights with prior approval of the Executive Committee.
20. A sub-lessee is to be enrolled as a member of the Society. Any charges levied are not to exceed those which the lessor would normally pay for the same grazing.
21. Paddocks can be subleased for any length of time to the two year limit, **but** a long term sublease is to go to club members on the waiting list only. If you need to share your paddock for a short time only, such as when there is too much grass, you can share with

anyone as long as they are aware that it is short term. Short term is a maximum of six months,

WAITING LIST

22. Any person who is at the top of the waiting list who turns down a paddock twice, will rotate to the bottom of the waiting list.
23. Financial members on the waiting list will be offered paddocks ahead of non-members.

OFFICERS OF THE SOCIETY

24. The Officers of the Society shall consist of a President, Vice President, and Secretary, who may also hold the office of Treasurer. All officers shall be elected annually from amongst the members of the Society by a simple majority of the members at the Annual General Meeting.
25. Executive Committee. The Officers of the Society shall also be designated the Executive Committee. The Executive Committee shall be chaired by the President, (Vice President in his/her absence). The Committee shall have the power to co-opt other members to the Committee to assist with specific tasks or to form separate sub committees. The Executive will determine the voting rights of anyone co-opted from outside the Society.

VACATION OF OFFICE

26. An officer of the Society shall resign and vacate his/her office if he/she is expelled from membership under the provisions of these rules or if he/she becomes incapacitated or for any other reason is unable to attend to the duties of that office.

MEETINGS OF THE SOCIETY

27. Society Annual General Meeting (AGM). The AGM of the Society will be held as soon as practicable after the 31st August on a date decided by the Executive Committee. The date and place of the AGM is to be advertised in a newspaper circulating in the Hutt Valley, at least seven (7) days prior to the event.
28. Special General Meeting (SGM). The President may call a SGM at any time to discuss a specific issue that cannot wait until the AGM and is outside the authority of the Executive Committee to resolve. The President will also call a SGM when requested to do so by not less than 2/3rds of the membership. At any SGM or adjournment thereof, only the issue necessitating the meeting is to be deliberated.
29. Ordinary General Meeting Ordinary meetings of the Society are to be held at a frequency to be decided at the AGM. The purpose of such meetings is to transact the general business of the Society.

30. Quorum. At any AGM, SGM, OGM, sis financial members present shall constitute a quorum. If a quorum is not present within thirty (30) minutes of the time appointed for the meeting, the meeting shall stand adjourned to a date and time to be decided by a majority of those present, If at the adjourned meeting a quorum is not present within thirty (30) minutes of the time set for commencement of the meeting then the members actually present , provided that this number is not less than five (5), shall be deemed to constitute a quorum. In the event that five (5) financial members are not present then the meeting lapses and will be reconvened at a later date.
31. Voting. At meetings of the Society all questions will be decided by a majority vote or show of hands. Every financial member aged 18 years and over is entitled to one vote. The Chairman, in addition to a deliberative vote shall, in the event of equality of voting, exercise a casting vote.
32. Proxies. Members who are unable to attend a particular meeting may be represented by a proxy. The instrument appointing the proxy (who need not be a financial member of the Society) must be in the hands of the Secretary prior to the commencement of the meeting for which the proxy is required. (A specimen proxy form is attached).
33. Chairman. The President or in his absence, the Vice President, or in their absence, a financial member elected for the purpose or any person specially invited by resolution of members shall be the Chairman of the meeting.
34. Secretary/Treasurer. The Secretary may also hold the office of Treasurer. It shall be the Secretary's duty to keep the records and minutes; to attend all meetings of the Society; to receive all correspondence; to arrange all business for the consideration of the Executive Committee and meetings of the Society; to conduct the Society's correspondence under the direction of the President; to advertise or give notice of the meeting of the Society. As Treasurer, to receive moneys due to the Society and issue receipts; to keep the accounts and to assist in all matters connected with the affairs of the Society.
35. Petty Cash. The Treasurer is authorised to hold a Petty Cash float to a maximum of fifty dollars (\$50). Petty cash is to be used to cover routine administrative purchases of items with a one time price of up to thirty (30) dollars. Single item purchases in excess of this amount are to be approved at a full meeting of the Society.
36. The Secretary/Treasurer is to maintain a register of all monies spent from Petty Cash and where applicable obtain receipts. Petty cash will be replenished as required from the Society's bank account.

AUDITOR

37. One or more auditors shall be appointed at the Annual General Meeting **and his or their remuneration approved by the members.**

THE COMMON SEAL

38. The Common Seal of the Society shall remain in the custody of the Secretary and shall not be affixed to any Deed or other document without the authority of the Committee. The Common Seal shall be affixed in the presence of the Secretary whom shall attest to the affixing of the Common Seal by adding his/her signature. A register is to be maintained to record details of each occasion that the Common Seal is affixed.

ALTERATION OF RULES.

39. The members of the Society shall have full power at their Annual General Meetings to alter or annul any of these rules, and to make such other rules as they or the majority of those present at such meetings, shall judge proper and necessary for the better government and direction of the Society.

GENERAL.

40. The following general rules shall apply to the day to day organisation of the Society:

Recreation Paddock. This paddock exists for the use by members as an exercise paddock. Limited grazing for members horses for a period not in excess of 24 hours is available without request.

Members who for any reason require to graze for longer than 24 hours are to obtain the express permission of the President. Should the President not be available the Vice President is delegated the authority to approve such requests should circumstances warrant.

Members who require grazing in excess of 24 hours for sickness or injury of a horse are to advise the President on a regular basis, as to the animals condition.

In all cases, members who use the Recreation Paddock are to ensure the paddock is 'mucked out' and left in a clean and tidy condition.

Roading. The maintenance of access roads is shared jointly between the Wellington regional Council and members. Reasonable and appropriate speeds are to be maintained on all roads.

Fencing. Fencing is a members responsibility. All fences are to be constructed of approved permanent materials and maintained in a fully serviceable condition. When viewed from the river access road, members are responsible for the fences on the right hand side of their area.

Gates. are to be of an approved type and maintained in a serviceable condition. The minimum acceptable form of securing such gates is by chain and hasp with an approved staple. Members are, for reasons of security, recommended to use a suitable lock and chain.

Access to Paddocks. In accordance with the terms of the lease the Society is obliged to provide pedestrian access to and along the river. Such access requirements are satisfied by the provision of an unlocked horse/pedestrian gate in the fence adjacent to the Hutt River.

Members are to ensure that the main track gate is kept shut and locked at all times; irrespective of the numbers of members present, or the expected duration of the member's vehicle access.

Noxious Weeds. The control of noxious weeds is the members' responsibility. Members are to ensure that noxious weeds are controlled both within their grazing area and the road frontage of their area. If in the opinion of the Committee a contractor is required to clear **any area** of noxious weeds, the Committee will engage the contractor and recover all costs from the member or members concerned.

River Bank. Under no circumstances are horses to be grazed unattended on the river bank.

Assets. A register of Club Assets is to be maintained by the club Property Member. The Property Member shall be appointed by the committee from volunteer members.

Insurance of club assets will be arranged by the Executive Committee.

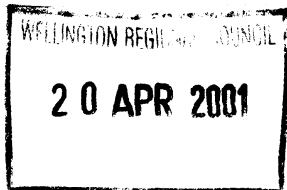
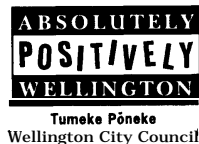
Members wishing to borrow Society equipment are to post a bond with the Property Member. This bond will be refunded on return of equipment in a satisfactory condition.

Submission 12

WELLINGTON CITY COUNCIL

PO Box 2199, 101 Wakefield Street, Wellington, New Zealand.

Ph 64-4-499 4444, Internet www.wcc.govt.nz



12 April 2001

N 3 13 28

B. Paul
A. Cross

Mr Alistair Cross
The Hutt River Floodplain Advisory Committee
Wellington Regional Council Flood Protection
FREEPOST 3 156
P O Box 11646
WELLINGTON

Dear Mr Cross

**HUTT RIVER FLOODPLAIN MANAGEMENT PLAN CONSULTATION
DRAFT**

SUBMISSION BY WELLINGTON CITY COUNCIL

I attach Wellington City Council's submission on the Hutt River Floodplain Management Plan Consultation Draft.

Your full consideration of the matters raised is appreciated.

Please inform me of any opportunity to speak to this submission at your May workshop.

Yours sincerely

Garry Poole
CHIEF EXECUTIVE

66094

Hutt River Floodplain Management Plan Consultation Draft.

Submission of Wellington City Council

1. INTRODUCTION

Wellington City Council (WCC) endorses Wellington Regional Council's (WRC) response to local community concerns over flood protection in the Hutt Valley. The makeup of the Hutt River Floodplain Management Advisory Committee (HRFMAC) is appropriate, in that it represents beneficiaries and stakeholders of the existing and proposed works.

While it represents the beneficiaries and stakeholders, it does not, however, represent at all those paying most for the benefits of flood protection works in the Region, that is the residents of Wellington City. So whereas WRC has appropriately identified and included the beneficiaries of this particular flood protection project in the Advisory Committee, it has also decided to pass much of the cost burden to communities that it did not consider sufficiently affected by the projects outcomes to warrant inclusion. The point being made is not to include communities such as Wellington and Porirua Cities on the Advisory Committee, but that these communities are not substantial beneficiaries and therefore should not bear substantial costs.

Analysis reveals that Wellington City ratepayers will fund about one third of the total costs of WRC flood protection works each year. This is more than the residents of Hutt and Upper Hutt combined, who will only pay 27% of the annual costs. The proposed Hutt River Floodplain Management Plan will incrementally add to this burden.

Wellington City Council, on behalf of its citizens, wants to communicate to WRC that this is unfair, has no credible logic and has the appearance of opportunistic burden shifting to a captive community.

The Hutt River Floodplain Management Plan Consultation Draft analysis of benefits confines them almost entirely to benefits arising on the floodplain. WCC agrees with this analysis and asks that it be applied to Flood Protection in general. The Consultation Draft, however, is at odds with WRC's Funding Policy and how the Regional Council intends to fund the project. This is because the Advisory Committee does not ascribe significant benefits at the regional level in the Consultation Draft.

The purpose of this submission is therefore to appeal to WRC to consider the Advisory Committees own analysis and allocate costs in a way that is:

- Fair
- Transparent

- Efficient, in that those determining the level of investment do so in the knowledge that they will pay for the benefits they receive.

2. FLOOD PROTECTION AND WRC FUNDING POLICY

Page 143 of the Consultation Draft deals with funding the floodplain management plan. This, however, only summarises the current WRC Funding Policy, which says that 50% will be funded from the area adjacent to the works, as defined by their local authority borders, and 50% from the region as a whole. The Funding Policy must therefore be considered in dealing with flood protection funding.

Funding policies are a requirement of s122O of the Local Government Act. The act requires what has become known as the “three-step process” in making significant funding decisions, in order to make these decisions transparent. The steps are:

- i) To derive an allocation of costs based on the distribution of benefits, across the community and across time.
- ii) To apply any reasonable, relevant and lawful policy considerations, such as fairness and ability to pay, to modify the step-1 allocation.
- iii) To implement the step-2 allocation, using lawful, transparent, effective and efficient funding mechanisms.

WCC makes the following comments on WRC’s implementation of the 3-step process:

2.1 Step-1 Allocation

WRC’s step-1 (s122E 1a) cost allocation, based purely on distribution of benefits, is as follows:

| | | |
|-----------------------|------------|--|
| Floodplain Residents | 60%-70% - | Those whose properties are prone to flooding. Presumably residents and businesses near the river and spillways. |
| Infrastructure Owners | 15%-20% - | Those whose infrastructure is at risk from flooding, e.g utility companies, national and local road owners, local authorities. |
| Economic Catchment | 10%- 15% - | “Area adjacent to the floodplain”. Step-3 uses the immediate local authority as a proxy for this, i.e. Hutt and Upper Hutt. |
| Region | 0%-10% - | The Wellington Region. |

Floodplain Residents

The majority of the benefits (60%-70%) are ascribed to floodplain residents, presumably including businesses.

The Regional Council has the ability to assess levels of risk within the floodplain according to position on the river and altitude. This would identify the beneficiaries directly. WRC have stated, however, that this task is relatively difficult for what benefit it delivers. This position is based on advice received several years ago, that stated the cost of the analysis was too large compared with the sums to be allocated. WCC disagrees with this position, as it:

- i) Implies that WRC does not have a true picture of the benefits delivered by millions of dollars of flood protection.
- ii) Further implies that no thorough cost/benefit study has been carried out, otherwise WRC would know what properties are threatened by what level of flood.
- iii) Suggests that new topographical information is required. This information is available, relatively easy to obtain and does not need to be applied at a fine degree of detail to greatly improve the identification of beneficiaries.

If WRC maintains that this exercise is too difficult, WCC will willingly provide advice on how to do it.

WRC have acknowledged that flood protection works increase the value of properties they protect. When others, outside the protected area, pay for the works, a wealth transfer occurs from those paying to those benefiting. WRC acknowledge this also, but do not appear to let it affect their cost allocation. It is likely to be a contributing factor to why the locally based Hutt River Floodplain Management Advisory Committee recommended spending almost twice as much as the wider Regional Council finally approved.

Infrastructure owners

Infrastructure owners are allocated 15% to 20%. While many of these are not usually **rateable** under legislative settings, or due to their absence from the valuation roll, they are also correctly identified as beneficiaries. The lower percentage of benefits ascribed to this group is appropriately lower than that for floodplain residents.

Economic catchment

Benefits to the “economic catchment” (10% to 15%) are less obvious. Businesses located on the floodplain would be more at risk due to material losses, as well as interruption of supply of inputs, in comparison to those near the area, which might only have input supplies interrupted.

For this reason floodplain located businesses should be covered under floodplain residents above. Benefits to those in the economic catchment “adjacent” to the floodplain have also not been rigorously assessed.

At face value the WRC range of 10%-15% appears too high. Losses to businesses not directly affected by flooding will be interruptions to input supplies, e.g labour, materials and energy. Losses will equal lost profits, not lost turnover, as costs will also drop during the interruption. Depending on the amounts of fixed and variable inputs, these losses will vary. For example, if

the business has to pay labour costs (i.e. this cost is fixed) even though it is not producing, then losses will be higher than for firms that can vary this cost.

Regional community

Local Government boundaries were radically redesigned in 1989. The boundaries of Local Government regions in New Zealand were largely determined by geophysical characteristics such as floodplains.

Territorial local authorities (city and district councils), on the other hand, were designed to balance community of interest (where parochialism was leading to increasingly smaller units) with economies of scale (which suggested larger units).

The idea of a “regional community” is therefore dubious and appears, in this context, as something of a convenient device to diffuse costs while concentrating benefits.

2.2 Step-2 Allocation

Ability to Pay

The step-2 logic does not appear to be based on any explicit analysis. This is reason for concern, given such large transfers of cost from away from the obvious beneficiaries, to others with low levels of benefits, as identified by WRC’s own step-1 analysis.

On ability to pay, there is no evidence that the council analysed the ability to pay of regional residents. This is at odds with s 1220 of the Local Government Act, which requires:

“(b) The rationale, in terms of section 122C(1)(d) of this Act, for any allocation of costs including.. . the specific issues of fairness and equity taken into account.”

While Wellington City has higher household incomes than any local authority area in New Zealand, this does not mean that Hutt and other areas cannot afford to pay for flood protection. Average household incomes from the 1996 Census are detailed below

| Territorial Local Authority | Average Household Income 1996 | Number of Dwellings 1996 |
|-----------------------------|-------------------------------|--------------------------|
| Wellington | 58,409 | 59,250 |
| Porirua | 50,987 | 14,085 |
| Lower Hutt | 47,456 | 34,140 |
| Upper Hutt | 45,836 | 12,831 |
| Kapiti Coast | 39,013 | 15,415 |
| South Wairarapa | 35,354 | 3,411 |
| Masterton | 35,244 | 8,447 |
| Carterton | 35,064 | 2,514 |

Shifting, say \$3million of the burden back to the Hutt Valley will only increase average household regional rates by around \$55 per year. This is about one tenth of one percent (0.001) of average household incomes for Hutt and Upper Hutt residences.

Requiring Wellington City ratepayers to pay one third of total flood protection costs, while those living in this particular area of benefit pay only 27%, cannot be reconciled with this analysis.

WRC also acknowledges that shifting the cost to ratepayers outside the floodplain results in a wealth transfer. This is a tacit acknowledgement that benefits are largely contained within the floodplain. This point is then apparently ignored.

Other Regional Considerations

The Regional Council “values all residents and businesses.. . being safe from the risk of flooding.. .”. It is not apparent that this justifies shifting costs to other parts of the region. In fact, shifting costs is likely to promote living in flood-prone areas by shifting the costs of mitigation elsewhere. This is acknowledged, but also appears to be ignored. In order to optimise people’s location decisions, they should face the true costs of those decisions. Artificially lowering the cost, encourages communities to take on more risk and generate further demands for mitigation and remedial expenditures — most of which is to be paid for by other people. The Regional Council appears to ignore this important consideration.

Environmental and Amenity Benefits

This appears reasonable, but should be a mathematical exercise where those costs arising from environmental and amenity aspects of the investment are calculated separately and funded according to a reasonable “who benefits” analysis. The Regional Council has done this with the distribution of costs for the Stadium amenity.

Sense of Community

This is at odds with WRC’s actions where dedicated consultation and representation on advisory boards, in this particular instance, was limited to WRC, Hutt, Upper Hutt and iwi.

Confusion of Funding Policy Process

WRC has continued to assess benefit distributions at step-2 of the 3-step process. This is an incorrect application of the process. All benefits should be assigned at step-1 to form a benefit-based distribution of costs. Step-2 is for applying policy modifiers to that cost allocation. WRC’s approach reduces the transparency of the funding decisions and has the look of wanting to re-litigate what was essentially a reasonable analysis at step- 1.

2.3 Step-3 Allocations

The allocations for flood protection in total are confusing. For instance, 6 1% of the operating costs come from regional general rate. This is more than the 50%

the Funding Policy says should come from this source. The Regional Council has explained this anomaly as being due to:

- “1) *Some of the loans relate to a time before the adoption of the 50/50*
- 2) *Planning costs are included and are regionally funded”*

WCC does not accept this as a reasonable justification. If these are factors influencing the final allocation of costs, then the final allocation should be 60/40, not 50/50 as disclosed in the Funding Policy. This leaves the Regional Council three reasonable options:

- i) Amend the Funding Policy
- ii) Reduce the regional general rate funded portion from 61% to 50%.
- iii) Provide a clear explanation of what is really happening.

Please note; while this is an important transparency issue, rectifying it alone will not rectify the unfairness of the allocations.

Regional General Rate vs Regional Works and Services Rates.

The regional general rate should ideally be used to fund activities that deliver benefits evenly across the region. Examples are regional democracy and regional plans.

- The Rating Powers Act provides regional councils with specific funding mechanisms for activities delivering benefits at the sub-regional level, specifically “Regional Works and Services Rates” and “Catchment Board Rates”. These rates should fund services with sub-regional benefits.

WRC is clearly capable of fine-tuning the regional rates burden, as demonstrated by the “Stadium Rate” and the “Regional Transport Rates”. Using such imprecise logic and allocations for flood protection is highly inconsistent with these other practices.

Effectiveness Efficiency and Transparency

The objective of step-3 of a Funding Policy is to achieve the step-2 allocation with effective, efficient and transparent funding mechanisms. The current allocation fails in two out of three of these objectives.

- i) Efficiency, in that those receiving the majority of the benefits (and having considerable influence over how much is invested, via the Advisory Committee), bear a minority of the costs. This is evidenced by the Advisory Committee’s recommendation to opt for a much higher level of flood protection than the Regional Council finally proposes to fund.

The investment will encourage over-development on the floodplain at the expense of areas with cheaper overall cost structures.

- ii) Transparency, in that those who pay most, do not understand what they are paying for, while those receiving the benefit are less likely to understand the actual cost

2.4 Level of Investment and Benefit

“Benefit”, in the context of flood protection, is not specifically defined in the WRC Funding Policy. It can reasonably be taken to mean the value of avoidance of loss of life and material loss from uncontrolled flood events.

Placing a value on the avoidance of loss could then take a standard risk management approach where the value of the flood protection works = cost of potential material loss, multiplied by the probability of the flood event. It would also be reasonable to place a value on and add some intangible costs loss for such things as trauma due to flooding events.

WRC propose to build the improved flood protection works to cope, in general, with a 440-year flood event. This assumes a probability of 0.23% (1/440) of a flood event that would test the system to its maximum in any given year. If the operating cost for mitigating this risk \$3,000,000 per annum, it would need to be preventing material damage of \$1.32 billion to be worthwhile, in an insurance sense. This seems excessive as \$1.32 billion equals approximately 14% of the total capital value of Hutt and Upper Hutt cities.

3. CONCLUSION

The way that WRC intends to fund Hutt River floodplain management has little relationship with the analysis of who benefits in the WRC Funding Policy and even less with the more recent Hutt River Floodplain Management Plan.

WRC’s rationale for modifying the allocation of costs, so that Wellington City ratepayers pay one third, is weak, cursory and unfair.

WCC emphatically requests HRFMAC and WRC to allocate costs to the actual beneficiaries as they are described in the Consultation draft.

Submission 13

T R A N S P O W E R

Caroline Horrox
Tel: 04 495 7140
Fax: 04 472 0559
E-mail: caroline.horrox@transpower.co.nz

14 April 2001

Flood Protection Group
Wellington Regional Council
Freepost 3 156
PO Box 11646
Wellington

Dear Sir/Madam

Hutt River Floodplain Management Plan Consultation Draft – Transpower Submission

The following submission is made on behalf of Transpower New Zealand Limited.

Transpower is the owner and operator of the National Grid. Transpower's Melling substation and parts of the Haywards - Melling B transmission line are situated on land subject to the Hutt River Floodplain Management Plan Consultation Draft.

The attached submissions are intended to be constructive. Transpower is willing to discuss the submission with staff in order to clarify its intent. Please do not hesitate to contact me if you wish to discuss any of the issues raised in the submission.

Yours faithfully
TRANPOWER NEW ZEALAND LIMITED



Caroline Horrox
Environmental Advisor

23 APR 2001

N 31328

B. Powell
A. Cross

Submission by Transpower New Zealand Limited to the Hutt River Floodplain Management Plan Consultation Draft

To: Wellington Regional Council
Freepost 3 156
Wellington

Attention: Flood Protection Group

From: Transpower New Zealand Limited
PO Box 1021
WELLINGTON

1 Introduction

The following is a submission on behalf of Transpower New Zealand Limited to the Wellington Regional Council's Hutt River Floodplain Management Plan Consultation Draft.

Transpower New Zealand Limited is the owner and operator of the National Grid, which supplies people, communities and industry with electricity. Transpower has the following assets within the Hutt River corridor:

- Melling substation
- Haywards - Melling B, 11 0kV transmission line (towers 3 1, 32a and 32b)

Melling substation and the Haywards - Melling B transmission line are an essential part of the servicing infrastructure of the Wellington region. It is therefore very important to Transpower that appropriate measures are taken to protect the substation and associated transmission lines within the river corridor from flooding. Transpower is committed to the implementation of a long-term flood mitigation strategy for its assets located within the river corridor.

Transpower also has certain requirements to ensure the ongoing operation, maintenance and upgrading of the Melling infrastructure. It is therefore important that the Hutt River Floodplain Management Plan strikes a balance between the implementation of appropriate flood mitigation strategies, and enabling Transpower to provide for the operation, maintenance and upgrading of the Melling infrastructure in an efficient and effective manner.

Transpower generally supports the Hutt River Floodplain Management Plan's purpose; to implement flood mitigation strategies to improve the quality and security of the Hutt floodplain environment, and also a number of the plan's policies and proposed measures to achieve this purpose. However Transpower has some specific concerns relating to the appropriateness and efficiency of some of the plan's proposed policies and flood protection measures. Specific comments on the policies and proposed measures outlined in the Hutt River Floodplain Management Plan are provided below.

2 Hutt River Floodplain Management Plan - Comments on proposed policies and measures

2.1 Local body responsibility for implementation of non - structural land use measures

Transpower supports the shift in responsibility for implementing non-structural flood mitigation measures from the Wellington Regional Council to the Hutt City and Upper Hutt City Councils through their district plans. Transpower believes that this will allow for a more comprehensive approach to the management of activities within the river corridor and will complement the current responsibilities these councils have for managing activities within the river corridor.

2.2 Owner responsibility for flood mitigation measures

Transpower is committed to the implementation of a long-term flood mitigation strategy for the Melling site and the flood mitigation program at Melling is already under way. Transpower understands that it is primarily responsible for the implementation of flood mitigation measures for its assets within the river corridor. However Transpower considers it inappropriate for the planning of any major structural flood protection works (e.g. realigning or strengthening of the stopbank) to ignore Transpower's Melling assets. The Melling substation was established through a lawful process and is an essential service in the Hutt Valley, and should not be penalised for being located within the stopbanks.

In the instance that structural works planned by the Wellington Regional Council could reasonably be adapted to include the enhancement of flood protection for Melling substation, Transpower believes this should be legitimately considered.

2.3 Proposed Connolly Street Stopbank Strengthening and Property Purchase

Melling substation is situated within the section of the floodplain described as Boulcott Reach: Melling Bridge to Kennedy-Good Bridge. Transpower has concerns regarding the following measures proposed for this area:

- 1 The strengthening of the Connolly street (left bank) stopbank and the construction of a retaining wall adjacent to Safeway Storage (Melling substation's neighbour on the south side).*
- 2 The purchasing of private land to enable the Connolly street stopbank works to be accomplished*

The Hutt River Floodplain Management Plan does not provide details on the exact location or nature of these proposed works or which area of land the Wellington Regional Council proposes to purchase. Therefore Transpower is unable to determine their potential impact on Melling substation.

If the proposed stopbank strengthening and/or land purchase is to affect Transpower's Melling property, then it should be included in the Appendix 3 '*Property affected by river corridor boundary and structural works*' of the Floodplain Management Plan.

Transpower requests that the Wellington Regional Council provides it with more detailed information on these proposed measures. The Wellington Regional Council needs to consult with Transpower regarding any works or proposed land purchasing if it is likely to have an effect on Melling substation.

2.4 Proposed non structural land use measures - resource consent requirements

The Hutt River Floodplain Management Plan states that resource consent (for a non-complying activity) will be required to control "new and redeveloped key network facilities" in the primary and secondary river corridor to ensure they can operate in a 2800 cumec flood (on page 75).

The National Grid is a significant physical resource and it is consistent with the purpose of the Resource Management Act to promote the sustainable management of such a resource. While Transpower has committed to work towards the future upgrade of its Melling assets to comply with the 2800 cumec standard, this has to be balanced against its requirements to operate, maintain and upgrade the Melling infrastructure as required.

For this reason Transpower believes it is appropriate that any resource consent requirements applicable to Melling substation facilitate its sustainable management and does not unnecessarily restrict Transpower's ability to operate, maintain and upgrade these assets.

Transpower considers that maintenance or upgrading works (e.g. replacement of existing transformers with larger ones, or addition of new transformers, changes or additions to buses or gantries), occurring within the existing perimeter of Melling substation, should not be interpreted as "new" development or deemed to require a non-complying resource consent.

As future works at the substation will be designed to comply with the 2800 cumec flood level (where this is practical), this will have a positive effect on flood protection/mitigation. It therefore seems logical that these kinds of activities should be allowed to proceed as a permitted activity. This could be achieved by specific mention of the activity of the Melling substation, as it is unlikely that there will be any other type of activity that is so affected.

2.5 Managing and protecting utilities and services in the river corridor - guidelines

Chapter 4, Policy 9, states that the Wellington Regional Council will provide guidelines to enable service providers to better manage the location and installation of new services and the upgrading of existing services in the river corridor. It also states that upgrading relocated and new services will need to meet stringent installation standards that ensure that adverse effects on flood protection works will not result.

It states that the guidelines relating to these standards are provided in section 4.2.4 'Guidelines for Services and Infrastructure'. However there are no guidelines in this section. The only item in this section is Table 6 - Categories for Service Location. This talks about the *stopbank* but not the river corridor in general.

Transpower would like to receive a copy of these guidelines and the opportunity to provide comment on them, as they are likely to effect the management of Melling substation.

2.6 Developing Balanced Measures Appropriate to the Hutt Valley

Chapter 4, Policy 20 acknowledges that non-structural flood mitigation measures can potentially impose significant restrictions on land uses.

Transpower supports the Wellington Regional Council's promotion of a balanced approach to the development and implementation of flood mitigation strategies and emphasises that landowner rights need to be accounted for when formulating flood mitigation measures.

2.7 Sharing Responsibilities for Implementing Measures


As previously stated (2.1 - Local body responsibility for implementation of non structural land use measures) Transpower supports the shift in responsibility for implementing non-structural flood mitigation measures to the Hutt City and Upper Hutt City Councils via their district plans.

3 Summary

Transpower's Melling infrastructure is an important physical resource that provides an essential service to the Hutt Valley.

Transpower is committed to the implementation of a long-term flood mitigation strategy for its Melling assets situated within the Hutt Flood plain. This includes the upgrading of equipment at Melling substation to meet the 2800 cumec design standard, where this is practical. Transpower also has to provide for the ongoing operation, maintenance and potential upgrading of the Melling infrastructure in its present location.

Is therefore necessary that the Hutt River Floodplain Management Plan balances the provision of appropriate flood protection strategies with Transpower's requirements to operate, maintain and upgrade the Melling infrastructure.

| |
|---|
| Dated at Wellington this day of <u>19. April 2001</u> |
| Signature for an on behalf of Transpower New Zealand Limited  |
| <i>Caroline Horrox</i> |

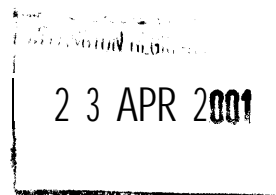
Submission 14

Hutt River Floodplain Management Plan: Consultation Draft

Submission Form

Name HuttValley Angling Club Inc
PO Box 40135
UPPER HUTT
Phone: 971 6696

D. L. Waechter
8 Crystal Gmve
UPPER HUTT
526 7236



Our Submission

The Hutt Valley Angling Club Inc would like to take this opportunity to congratulate the Flood Protection Group of the Wellington Regional Council for the "Consultation Draft of the Hutt River Floodplain Management Plan for the Hutt River and its Environment."

The Hutt Valley Angling Club recognise the need to provide flood protection for this river as has been detailed in the plan and request that full consideration be given to the fact that this river is a natural resource treasured for its intrinsic value as a living river ecosystem including a viable wild trout fishery.

We wish to speak to this submission at the public hearing.

Our views on the draft plan for the Consultation Draft of the Hutt River Floodplain Management Plan for the Hutt River and its Environment are as follows.

1.3.1 (P18) Add

- 0 recognising the intrinsic value of the river and its environments and actively maintain and protect these values.
- provide for monitoring of the river's ecology from the adverse effects of river management activities.

1.3.3 (P19) Enhance Environmental Values

- An Environmental Strategy that identifies measures necessary to maintain and enhance the *intrinsic value* of the river and its corridor is an essential component for the Plan.

2.5.2 (P87) This should read

- *Maintains and enhances the intrinsic value* of the river environment."

2.5.4 (P88) High priority

- to control vehicle access and ban vehicle access to the river bed as required in Part III Section 9 "Restrictions on use of land" of the resource Management Act.

Policy 12 (P112) Add to the policy

- monitoring the effects of the environmental performance standards and construction practices.

66191

Hutt River Floodplain Management Plan: Consultation Draft

Submission Form

Policy 16 (P115) Add to the policy

- **understanding** of natural process that contributes to the intrinsic values of the river ecosystem.
- monitor the **extraction** process to **determine** best practices in **protecting** the **natural** environment

Voluntary Actions (P133) Upper Catchment add

- Monitoring **and reporting water** quality for class **FS** water as specified in the Resource Management Act.

4.4.3 (P137) First bullet point should read

- a Protect **and enhance the intrinsic values of the ecosystem of the river and its margins.**

The Policies, issues should include

- Protect and **enhance the** existing fishery.
- Direct what is appropriate activity **within the** river and its bed to maintain **a viable fishery.**

Policy 25 (P139) Heading should read

Ecosystems and **Intrinsic Ecological Processes**

Policy 29 (P140) The Policy section should read

Improve and extend passive recreational **facilities** and **protect the fishery.**

6.2.1 Measuring Progress (P152)

- The **Environmental Strategy** is implemented *and monitored* in a manner acceptable to the community and **tangata** whenua.

Measuring Performance Add the following

- **Monitoring and reporting environmental impacts.**

Glossary

(P5) Add "Wild Trout Fishery"

Water system that supports breeding and the **natural** growth of trout.

(P7) Add "Intrinsic Values"

in relation to ecosystems, means **those aspects of ecosystem and their constituent parts which have value** in their own right, including --
(a) Their **biological and genetic** diversity; and
(b) The essential **characteristics** that **determine** an ecosystem's integrity, form, **functioning**, and **resilience.**

Hutt River Floodplain Management Plan: **Consultation Draft**

Submission Form

(P11) Sustainable Management

As defined by **Part 2 sections 5, 6 & 7** of the Resource Management Act ---.

Submission 15

Hutt River Floodplain Management Plan: Consultation Draft

Submission Form

Name Valerie W. Smith Address 26 Foster Crescent
Belmont
Lower Hutt
Phone 04 565 3430

N 3 28

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful?
- Will the Plan be useful?

b. Paul
A. Cross

Contact Alistair Cross at the Regional Council for information: phone 384-5708
email Alistair.Cross@wrc.govt.nz

Your Submission

I have watched your plan evolve with great interest and approve of it in every aspect.

As a regular dog walker, the stretch of river bank between meeting of Kennedy Road Bridges particularly concerns me, both in flood management & beautification.

While aware that who cannot walk for must have car access to the trees for picnics etc, I am extremely anxious that other vehicles - 4 wheel drives, trail bikes, hooners etc must be kept off the grass, & in particular the "creeflow" streams that cross it, to protect people and the environment.

As a frequent cyclist of the old Hill Drive trail from Petane to Alcatara Rd northward on both river sides, I wish very much these parts still rough, risky & requiring road use, are further improved for walkers and cyclists. This river has huge potential for tourism.



See the flip side for Regional Council FREEPOST ADDRESS to Tourism caring about you & your environment

We look forward greatly to having a River Ranger.

66035

Submission 16

23 APR 2001

Hutt River Floodplain Management Plan: Consultation Draft

Submission Form

Name MR Fred Allen

Address PO Box 37263 Stokes Valley
Lower Hutt Wgtn

Phone 04 934 0559

N/3/13/28

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- Is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful?
- Will the Plan be useful?

B. Paul
A. Cross

Contact Alistair Cross at the Regional Council for information: phone 384-5708

email Alistair.Cross@wrc.govt.nz

Your Submission

I read the 'Hutt River Floodplain Management Plan' will inform me of: the policy backing for all measures of the Environmental Strategy.

I have concerns about the implementation of the environmental strategy by an engineering dept. (Rivers Central) that has traditionally been conditioned to planting and managing exotics.

I therefore would like to suggest measures that may assist to ease the transition and wish to see other measures you deem will put in place also.

- Regular monitoring by the environmental division on integrity to plans and processes of implementation of Rivers Central engineering staff, employees and all subcontractors and suppliers of plant material.
- Re-orientation workshops for all Rivers Central staff, contractors and subcontractors in Theme Poplars, willows to Kanuka, manuka.



caring about you & your environment

See the flip side for Regional Council FREEPOST ADDRESS

CG137

Submission 17

Submission 18



FAXED

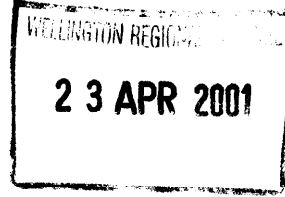
Hutt Golf Club

ALL CORRESPONDENCE
TO BE ADDRESSED TO
THE GENERAL MANAGER
PO BOX 30-113

TELEPHONE: 04-567 4722
FACSIMILE: 04-567 4260
EMAIL: admin@huttgolfclub.org.nz

MILITARY ROAD. LOWER HUTT

20 April 01



N/3/13/28

*B. Paul
A. Cross*

Wellington Regional Council
Flood Protection
Freepost 3 156
P O Box 11 646
Wellington

Attention: Mr Alistair Cross

Enclosed is a submission from the Hutt Golf Club Incorporated on the Hutt River Floodplain Management Plan Consultation Draft.

We have endeavoured to confine our comments to broad principles rather than specifics affecting the Hutt (and Boulcott) golf courses. The Club has been assisted in developing these comments by Mr Eric Ireland a (retired) consulting engineer who is a member of the Club.

The Club seeks to maintain discussions with the WRC on the specific designs for flood protection in the Boulcott reach as they may affect the Hutt (and Boulcott) golf courses.

We appreciate the extension of time allowed for us to make this submissions and would like an early opportunity to discuss our views with you.

Yours sincerely

Brian Gillespie
Chairman

66157



Hutt Golf Club

ALL CORRESPONDENCE
TO BE ADDRESSED TO
THE GENERAL MANAGER
PO BOX 30-113

TELEPHONE: 04-567 4722
FACSIMILE: 04-567 4260
EMAIL: admin@huttgolfclub.org.nz

MILITARY ROAD . LOWER HUTT

**SUBMISSION TO WELLINGTON REGIONAL COUNCIL
ON
HUTT RIVER FLOOD PLAIN MANAGEMENT PLAN, CONSULTATION DRAFT**

1. The Hutt Golf Club takes this very limited opportunity to confirm its very great interest in the draft plan and in the consultation process which will follow.
2. The Hutt Golf Club wishes to be consulted on any move which in any way affects its course or buildings.
3. The Hutt Golf Club was established in 1892 and has owned the present site since 1909. Since that time it has improved the course and is still improving the course which is acknowledged as one of the regions best courses and is known nationally as a good test of golf. The members have made a huge investment in the facility over time and take great pride in their club.
4. The Golf Course is an important and significant part of the recreation facilities of Lower Hutt. It is used seven days each week by people of all ages for the whole year and is in great demand from members as well as from users from outside Lower Hutt. It hosts provincial, national and international events. The Club is looking to ensure that this facility is not downgraded by any implementation of the Plan.
5. The Hutt Golf Club, being mindful of the pressure on golfing facilities in Lower Hutt, also wishes to see that the Boulcott golf course is retained as a separate facility.
6. In the short time available to us it has not been possible to fully grasp the implications of the Plan as presented. We realise it contains all the information indicated in the past but this has now been put together in a tight package with quite specific proposals. We will need further discussion with you to clarify some aspects and then debate these.
7. The Club can understand a flood flow of 2300 cumecs but does not understand the logic of flood protection to a floodlevel of 2800 cumecs. The Plan is not clear on this. This is of great significance for the course.
8. The Plan makes clear that the location of stop banks on the golf courses is a matter for discussion with the Clubs but the Plan makes no reference to options or parameters for this. The Club will be seeking to maintain a golf course of at least the present quality within its boundaries and wants the assurance of the Wellington Regional Council and the Hutt City Council that this will be the outcome of the flood protection now proposed. One option discussed previously raises the question of why the Golf Course should, in 2001, still be regarded as inevitable flood plain.

6/2

9. The Hutt Golf Club will be formulating its own plans to provide for flood protection once the agreed level of protection has been established. The Club will do everything possible to maintain the quality of the course while at the same time work closely with the Regional Council in incorporating the Council's requirements. We envisage no cost to the Hutt Golf Club for the work of reconstruction or for consultation with and advice from the Regional Council.
10. Some issues which HGC believes must be addressed in the short term:
 - a. The course is not to become a receptacle for HCC stormwater as a result of the stopbank location, formation or upgrading.
 - b. Access to the stopbanks is to be controlled. They are not to become public thoroughfares at any time and particularly during any construction phase.
 - c. Maintenance of stopbanks.
 - d. Compensation for disruption during the carrying out of any earthworks.
11. The Club acknowledges the very considerable work which has gone into the Plan. In almost every respect it deals with flood protection issues but is silent when it comes to the Hutt Golf Course. The course and the neighbouring property of the Boulcott Golf Club are significant contributors to the overall scheme and consultation with both is of the utmost importance to the retention of these facilities.

April 20 2001

Submission 19

WELLINGTON REGIONAL COUNCIL
26 APR 2001

25 April, 2001

Submission from: Keep Petone Beautiful
To: Flood Protection Group, Wellington Regional Council
Subject: Hutt River Floodplain Management Plan for the Hutt River and Its Environment and the Hutt River Environmental Strategy

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| FILE NO | N/3/13/2 | |
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| A. Cross | | |
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Members of Keep Petone Beautiful have had a long involvement with planning issues relating to the Hutt River and its floodplain. They also attended recent meetings where the documents for comment were presented to the public for discussion.

We wish to congratulate the Flood Protection Group for the quality of the draft plan, and also thank the Wellington Regional Council for their consultation process. The time constraint for comment has been too short for us to meet the deadline given to us, so we hope you will accept our comments which are later than your advertised date for comments to be received for consideration.

Usually we restrain our comments to those areas within our Petone boundaries. In consideration of dredging, however, we wish to support dredging where this is considered necessary up to the Ewen Bridge. The effects of shingle buildup have been shown to be very important when we consider flood mitigation. In all cases where dredging is to be undertaken, we want environmental considerations to take precedence over economic benefits. There is a real cost to flood mitigation that must be costed and agreed to by our elected representatives. We believe that some of the dredging that is currently permitted at the mouth of the Hutt River has had adverse effects on the environment and on the stability of the piles of the Waione Street Bridge.

For many years we have had engineers from Regional Council emphasising the importance of the model hydraulic line for the western side of the southern end of the Hutt River. If the ideal shape for the river mouth is as we have been told for many years, we want to see the Wellington Regional Council implement this design. With most of the reshaping to take place on land owned by the Wellington Regional Council, this seems a very suitable situation for us to see flood mitigation taking place now.

Our final concern for this submission relates to vehicle access to the river. We oppose the use of 4WD vehicles in this fragile environment and we believe that limited vehicle access in visible constrained parking areas is all that should be provided. From what we have seen, most of the dumping along the river takes place where vehicles have easy access. We support wheelchair walking access as has been developed in the Hutt River Trail and trails for cycling.

Thanks and regards
Maureen Burgess
43F London Road
Korokoro
for Keep Petone Beautiful

66688

26 April 2001

Submission 20

AD35-18-11FT

Chairperson and Members
Wellington Regional Council

**SUBMISSION ON DRAFT HUTT RIVER FLOODPLAIN
MANAGEMENT PLAN**

Thank you for the opportunity to make the following submission on the draft Hutt River Floodplain Management Plan. Please note that this submission is provisional until it has been ratified by Hutt City Council. This is expected to be at the meeting scheduled for 22 May 2001.

1. Hutt City Council commends Wellington Regional Council on the draft Hutt River Floodplain Management Plan. We believe that it represents a practical approach to addressing the flood risk associated with the Hutt River.
2. We are pleased that the plan recognises that as well as representing a major flood risk, the Hutt River also represents an amenity for Hutt City and that the plan seeks to enhance this amenity value.
3. We support the establishment of the proposed joint management committee to oversee the implementation of the environmental strategy. As the Hutt River forms an important part of the environment of the city it is important that Hutt City and Upper Hutt City have the ability to provide input to projects at an early stage. At its meeting on 5 September 2000 Hutt City Council formally endorsed the vision and guiding principles set out in the Draft Hutt River Environmental Strategy.
4. The environmental strategy in the management plan incorporates a list of proposed activities ranked from urgent to low in priority. Cost and wider benefits to the community should also be taken into account in determining the timing of these activities. For example while the establishment of a heritage trail is shown as having a low priority it may also have a relatively low cost. It would also be likely to promote greater interest in the river by the community and visitors in which case earlier implementation may be justifiable than its low priority ranking would suggest.
5. Policy 8 in the Plan provides that “Apart from exceptional circumstances, only new or rationalised stormwater outlets and lighting for public security or safety, will be laid in or through stopbanks” and that “Formal crossing points beneath stopbanks for all other services will be developed

in consultation with all service providers.” In addition to stormwater outlets there is a continuing need for a small number of wastewater discharge outlets to be provided to operate during abnormally high flows or emergencies as part of contingency and disaster planning measures. As with stormwater outlets there is no practical alternative to these outlets passing through the stopbanks. The policy should recognise these outlets in a similar manner to the way it recognises the need for stormwater outlets.

6. The objectives and structural measures proposed in the Plan for the Hutt River and its stopbanks should directly address the protection of essential trunk wastewater pipelines against scour and erosion. Failure of these services could have serious public health risks.
7. The current Regional Council Funding Policy for flood protection is supported. While the Hutt River is a potential liability with respect to the flood risk it is also the source of the Hutt Valley artesian water supply. In order to achieve a reasonable balance any review of the funding policy should not consider flood protection in isolation but needs to cover all water activities including bulk water supply and distribution.
8. We are generally supportive of the matters raised in the Management Plan as it relates to non-structural matters. However, it is necessary to reiterate our comments made to a previous draft that the land-use controls proposed in Table 3 must at this stage be broad general guidelines and may well have to be amended after more detailed consideration. The District Plan variation process should not be constrained by the land-use controls specified in Table 3: In this respect it is considered that the last sentence on page 66 - “Finally, any activity not covered by these tables would automatically be permitted without having to meet permitted activity standards” should be deleted. That statement could potentially constrain the District Plan variation process.

Submission 21

Alistair Cross

From:
Sent:
To:
Subject:



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| FILE NO | N/3/13.28 | |
| NOTE | NIT | DATE |
| ACROSS | | |
| | | |

13:51

26 APR 2001

.rtf
Giddy Alistair,

with this mail I send an rtf-file with some comments about the FMP. I fear that all you already have been discussing similar ideas, but these have been my first impressions when I read the plan.

Kind regards

Gerold

Wellington

~~~~~  
**Regional Council SECURITY WARNING**

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## Some comments about the Hutt River Floodplain Management Plan

### *Formal aspects*

The plan as part of a long planning procedure resp. process explains in a very clear and understandable manner the problem of floodings and how this problem is going to be solved. Compared with the German flood protection plan I now it is the plan document really exemplary: Everybody can read and understand which measures will be implemented, when this will happen, what it will cost and – most important – who will be affected in which way.

This positive effort I would like to underline as such a clear procedure seems – for me – a good example for a democratic way of planning.

### *Protection standards*

The 1 in 100 year flood-standard for isolated buildings or small urban areas, which will be halved by the climate change to 1 in 50 years can be compared to German and Suisse standards which are the same ones. But for urban areas the Hutt River standards are a bit higher than in Germany or Switzerland. In these two European countries first damages and **stopbank** overflow are accepted for floods with a probability of less than 1 % /a. Only very important infrastructure gets a higher protection – comparable to the bridge protection standard in the Hutt-River Valley.

Therefore the 1 in 440 years -goal gives is quite a good protection.

### *Maori values, sustainability*

- The integration and consideration of Maori values is a noteworthy part of the FMP. Concerning the priority schedule I asked myself if the Maori values are compatible to weighted values in the schedule - with economy 60%, social aspects 20% and environment 10%. But, of course, this is a matter of definition and discussion. Sustainable development could be defined as a development with economy, social aspects and environment having the same weight - as e.g. a underdeveloped environment causes economical and social damage and should have therefore the same attention and weight. But this discussion seems to be very crucial – as the end of the Kyoto process in the U.S. shows.

### *Structural measures*

With stopbanks and the raising of buildings in very hazardous areas exactly the two measures have been chosen which can only be applied in the steep valley of the Hutt River. Theoretically a deviation channel for a part of the whole river flow during floods could have eased the situation at the river mouth. The channel could resp. could have followed the old river channel **hading** existed before the last big earthquake. But there is no space for such a channel in Petone, I fear – at least following the maps of the FMP.

The retention of water in a steep valley is difficult, too. High dams cause various damages within the ecosystem and the FMP consequently avoids them. And – by the way – they hardly can be paid.

As areas of minor infrastructure like golf courses are integrated within the river flood corridor, possible space and volume for flood retention is reserved and used. So no further structural measures seem possible.

26 April 2001.

### *Non-Structural measures*

Concerning non-structural measures there seems – for me – to be the possibility for additional actions. Some examples which perhaps could be considered:

The linear-park is a very good idea to connect bank protection and use of the river-channel as ecological link between different river segments and the need for recreational areas and the need to conserve the river to be used in a traditional Maori way. But I couldn't find attempts in the plan to connect the linear-park with the urban environment. To strengthen the environment within the urban areas strengthens also the river channel and its ecology. This idea leads to the next aspect:

The urban sewer systems are not mentioned in the FMP (or perhaps only I couldn't find and haven't read it). They should be integrated, to reduce surface overflow and so the pollution of the flood water. Additionally a urban rainwater management (retention, infiltration) could reduce flood peaks. If this reduction could be reached at Upper Hutt, in Stokes Valley and Silverstream Valley this may reduce the Hutt River flood peak at Lower Hutt about a few percent (?).

Earth works and land use outside Urban Areas should not only be monitored but integrated in a complex flood prevention. Similar to the urban areas the actual use of land should be accepted as »regular«. But a further change should only be accepted in case any negative implications concerning run-off and the Hutt River flood situation is excluded. During regular discussions with farmers and forest-owners there should be developed ways of land use which expand the water retention capacity of soils. New urban areas should have to implement a rigid rainwater management so no additional run-off is caused. This type of measure never is very popular. But the long time-period of the FMP should be used to integrate long-term politics in favour of a strengthened environment and so higher water retention capacities of plants and soils.

## Alistair Cross

**From:** Gerold Caesperlein [gerold.caesperlein@okay.net]  
**Sent:** Thursday, 5 April 2001 11:41  
**To:** Alistair Cross  
**Subject:** Re: Hutt River Floodplain Management Plan

Giddy Alistair

First I would like to thank you very much for your prompt and friendly answer to my request. I really agree, the internet is quite terrific and gives sometimes an amazing variety of opportunities. And by the way, flood problems are a real global topic, so international exchange of data and concepts can help to learn from each other and to avoid mistakes being done somewhere else.

Concerning your deadline - in case the copy will arrive before Easter, I will have right the time to read your propositions and will surely try to find out if there's any advice which may help you in your efforts to find the best solution.

Perhaps some words about my work and the situation I have to deal with: Flood control gets a more and more important topic for daily planning. First, only always the same rivers like Rhine and Mosel had caused some very high flooding. But within the last years, there **occured** floodings along a hundreds of rivers, and often with peaks nobody could remember having heard about. Especially here in the Munsterland in the North of Dortmund along little rivers and creeks.

But - between declarations and the daily local practice there is still a very wide gap. It is now two years that the authorities of the »Land« (= province, state) Nordrhein-Westfalen are permitting further settlements only within areas which are not affected by floodings **occurring** one time in 100 years (flood proof areas). Here you have the similar effort to keep people out of flood prone areas.

But, or I should write: **BUT:**

With this guideline the problems are not banned. The communities here in the Munsterland are facing a high demand for new areas for settlements by people looking for a own house in a »green« environment. Of course the communities want to offer these areas and so they try to proof that areas are not flood affected or are willing to invest in floor retention facilities like dams etc.. Additionally, storm water retention in new urban areas has only to keep the **10-year-rainfall**. That leads to slightly higher flood peaks during heavier rainfalls - depending on the specific situation of the river basin.

And: Farmers are not willing to prevent floodings: River banks are minimized and reduced down to only several metres, the way of farming leads to rising runoff - all problems which are not included in flood prevention plans yet.

The public opinion is also split about flood control. Along some rivers, especially Rhine and Mosel, people try to arrange themselves with almost yearly floodings. Some communities invest in mobile flood **protection** walls and things like that and some people are cleaning and drying there homes without any further anger or protest. On the other hand - and that is the actual case I have to deal with - there are people living in non-urban areas very near to creeks claiming nevertheless a flood protection for the 100 to 200-years-flood and try to get this - even with a little help of their lawyers.

Concerning this case with isolated buildings are in danger to get flooded but because of a very flat landscape without any danger of damages by erosion I think about some kind of **accomodation**: The highest flood peaks reach only cellars and the ground-floor, so with a slight elevation of the surrounding garden it is possible to get safe islands within the wide-spreading floodings. With a additional pump system to keep groundwater inflow under control these houses can be **accomodated** to floodings. At the moment this seems to be an adequate solution. Dams or the widening of the creek profiles would reduce flooded areas but would lead to a faster runoff and higher flood peaks at lower river sections.

More details - I think - within the next weeks.

Kind regards

Gerold Caesperlein  
Lentstr. 19  
D-44143 Dortmund  
ph +49 231 591 957

P.S.: Quite funny that you were cycling »**just** round the **corner**«. I hope that you weren't hit by the poor weather we had last summer. But not without reason we have to think about flood protection.....

>  
>  
> Giddy Gerold  
>

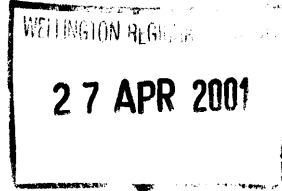
# Submission 22

# HUTT VALLEY TRAMPING CLUB INCORPORATED

P.O. Box 30 883 Lower Hutt

21 April 2001

Flood Protection  
Wellington Regional Council  
P.O. Box 11-646  
Wellington



|           |           |      |  |
|-----------|-----------|------|--|
| FILE NO   | U/3/13/26 |      |  |
| NOTE      |           |      |  |
| A. Aitken | AM        | 30/4 |  |
| B. P. ... | R         | 15/4 |  |
| DA -      |           |      |  |
|           |           |      |  |
|           |           |      |  |
| ACTION    |           |      |  |
| AC        |           |      |  |
|           |           |      |  |
|           |           |      |  |

## Hutt River Floodplain Management Plan - March 2001

Hutt Valley Tramping club members participate in a number of outdoor activities on the floodplain, particularly walking and mountain biking.

We would like to see particular emphasis put on stopbanks and other structures so that they are of a design standard that allows them to be traversed by walkers and cyclist.

We would also like to see walkways and cycle ways on both sides of the river and bridges.

The early planting of native plant species to enhance the riverbanks would also be appreciated.

Yours Sincerely

for Margaret Aitken  
Environmental Convenor  
Hutt Valley Tramping Club

- Hutt FRMP submission

30/4

66349

# Submission 23

WELLINGTON REGIONAL COUNCIL  
30 APR 2001

|         |            |
|---------|------------|
| FILE NO | N/13/13/28 |
| DATE    |            |
| NAME    |            |
|         | S. PAUL    |
|         | A. CROSS   |
|         | DA         |
|         | DSW        |

Hutt River Floodplain Management Plan: Consultation Draft  
Submission Form

Name Clear Communications Ltd Address C/- Harrison Gieson Consultants Ltd  
P.O. Box 11-048, Wellington  
Attn: Jenny Gummert  
Phone 04-385-0005

These questions might help you consider a response:

- Does the Plan make sense?
- Does the Plan have all the information you need?
- Is the Plan cohesive?
- Is the language complicated?
- Is the information well presented?
- Is the information easy to understand?
- Are the maps and diagrams helpful? *none contained in Draft Policy.*
- Will the Plan be useful?

Contact Alistair Cross at the Regional Council for information: phone 384-5708  
email Alistair.Cross@wrc.govt.nz

Your Submission

Thank you for the opportunity to participate in the submission process. At this stage we have no further comments to make.  
We look forward to the next stage of the process.

*[Signature]*  
26.4.2001



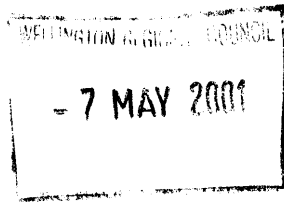
caring about you & your environment

See the flip side for Regional Council FREEPOST ADDRESS

66422



# Submission 24



|         |           |  |
|---------|-----------|--|
| REF NO. | N/3/13/28 |  |
| DATE    | 8/5/01    |  |
| BY      | B. Paul   |  |
| FOR     | A. Cross  |  |
|         |           |  |
|         |           |  |
|         |           |  |
|         |           |  |
|         |           |  |
|         |           |  |

Civic Administration Building  
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Private Bag 907, Upper Hutt  
Tel: (04) 527-2169  
Fax: (04) 528-2652  
Email:uhcc@uhcc.govt.nz  
Website:www.upperhuttcity.com

Wellington Regional Council  
Flood Protection  
Freepost 3 156  
PO Box 11 646  
WELLINGTON

ATTENTION: Mr Alistair Cross

File: 308/7/2

1 May 2001

Dear Alistair

**SUBMISSION ON DRAFT HUTT RIVER FLOODPLAIN MANAGEMENT PLAN**

Thank you for the opportunity to make the following submission on the draft Hutt River Floodplain Management Plan. The Plan has been considered by a sub-committee of our Councillors and the following is their comment on the proposed Plan.

With the qualifications noted below Upper Hutt City Council generally supports the draft Hutt River Floodplain Management Plan. We are pleased to see a planned approach to the management of the river which has considered not only the structural protection afforded by stop banks but also the preparation of an environmental strategy, channel management and consideration to non-structural measures focussed on keeping people away from flood waters and preparing the community to cope when flooding occurs particularly in those areas that do not have physical protection.

However, whilst we are generally supportive of the non-structural measures concept we are concerned that land use controls proposed in table 3 may constrain the district plan variation process. Land use controls proposed in table 3 must at this stage be considered as broad guidelines that may well be amended after more detailed consideration at the local level. The comment at the top of page 66 does suggest that non-structural measures as presented in the plan should only be read as a general guide however, the next sentence on that page "finally any activity not covered by these tables would automatically be permitted without having to meet permitted activity performance standards", should be deleted as should any other reference in the draft plan stating that Upper Hutt City Council "will" carry out some particular operation.

Specific comments on the Plan are as follows:

**Executive summary:**

- At the bottom of page 3 under the heading Bridge Replacement, the draft states that all bridges will be upgraded to 2800 cumec standard upon replacement and that replacement will be funded solely by bridge owners. Replacing of bridges to pass a 2800 cumec flood is also again inferred on page 27.

Our understanding from the Advisory Committee meetings was that the 2800 cumec flood did not necessarily have to pass under the bridge, the flood way could also be used. This is supported by the amended pages issued for table 3, page 76 where the words "and the associated flood way" have been inserted.

66757

We also believe that the statement on replacement being funded solely by bridge owners is incorrect as allowance has been made within the budgets for a contribution towards both the Ava Rail and Moonshine Road bridges.

Amended table 3 also refers to upgraded bridges being required to pass a 2800 cumec flood. As noted, table 3 can only be taken as a guideline at this stage, however, we would not agree with the requirement that upgraded bridges be required to pass a 2800 cumec flood. The upgrading may be solely related to strengthening for earthquake reasons, e.g. Silverstream Bridge and the additional cost to provide a 2800 cumec flood capacity may be enough to prevent the project proceeding and thus the main objective, i.e. strengthening not being achieved.

- On Pages 4 and 5 of the Executive Summary under the heading “Types of Non-Structural Measures” the inference is that decisions have already been made on the non-structural rules to be included within District Plans. As previously stated, we are generally supportive of the non-structural measures approach but the Plan must make it clear that the measures shown within the Plan are guidelines subject to change as a result of further investigation prior to consideration for and as a consequence off District Plan variations. Similarly, at the top of page 5 the reference to increased spending by the three Councils is premature. Until such time as the non-structural measures are considered in detail, reference to additional spending is inappropriate.

### Chapter 1:

- On page 9 under the heading “Predicting Floods” reference is made to “ following flood extent maps” which show the likely extent of flooding with the existing flood defences compared to flooding with completed structural works proposed by the plan. The extent of flooding under the existing flood defences has been modelled by simulating breaches at every kilometre of stop bank. For the reach between Moonshine Bridge and **Norbert** Street, some channel work is proposed but except for the left stop bank in the vicinity of the Moonshine Bridge no major work appears to be proposed for the remaining stop banks. Therefore, it is reasonable to imply that the current defences may fail but the upgraded defences, which are essentially the same, will not.
- On page 21 under the heading “Soils Conservation and Rivers Control Act 1941” it is stated “in the Wellington region only rivers and larger urban streams are managed by the Wellington Regional Council. City and District Councils handle smaller streams and stormwater channels”.

The extent of Upper Hutt City Council’s responsibility needs to be further clarified. Upper Hutt City Council does not manage streams in the rural areas and only maintains those considered public in the urban areas.

- The flow chart on page 24 again refers to the District Plan recognition of non-structural measures. Again such statements need to allow flexibility in developing the non-structural measures that will be included in District Plans.

### Chapter 2:

- On page 28 the list of programmed works until 2010 is shown. We support the proposed programme of works but consider that investigations for Ava Rail and Moonshine Bridge which are also proposed within this time-frame should be shown in the table.
- On page 29 under the heading “Modifying works priorities”, reference is made to Section 2.3 containing an original order of works set out in the structural measures priority schedule. The original reports to the Advisory Committee included a table which showed

the extent of work. We consider that for ease of reference such as a table, should be included.

- From page 30 to page 61 structural measures by reach are described. Comments are:
  - o The legend needs to be shown on each reach for ease of reading.
  - o Is the legend consistent? Heavy broken lines are supposed to represent major works but in some areas these seem to have been used to show existing stop banks.
  - o Some sites are described in the wording but not shown on the photos of the reach. For example Woollen Mills site, Whirinaki Crescent stop bank.
  - o No mention is made of the Silverstream Bridge. Given its restriction on flow, it should be noted.
  - o On Page 34 under the heading Ava Rail Bridge it is noted that the Regional Council and Transrail together will define an acceptable bridge upgrade strategy by June 200 1. Given the current desire by Transrail to get out of passenger rail and possibly the associated infrastructure, a mechanism needs to be in place to ensure that potential buyers are aware of the need to upgrade the Ava Rail bridge.
  - o For the Totara Park reach commencing page 54, no mention is made of the impact of protection works on Awakarangi Park. Given its importance as a sports field in Upper Hutt it should be included under the description of this reach identifying the changes that may occur.
  - o On page 57 the Norbert Street footbridge to Gemstone Drive reach is described. On page 28 the Gemstone Drive stop bank upgrade and the Akatarawa Road flood defences are identified as occurring before 2010. However, on page 57 under this reach, they are both identified as beyond 2010. Our understanding was that this work was as per the table on page 28, i.e. prior to 2010. On page 58 under the heading "Right bank" it is stated that no stop banks will be provided although assistance for house raising to the 1900 design standard will be available. We agree with this, however we also understood that edge protection to a 1900 cumec standard would be provided through the area behind Bridge Road.
- For Section 2.4 on non-structural measures from page 62 through to 84 we again emphasise that it must be quite clear to any reader of the plan that the proposed measures are guidelines only and have not been considered by Upper Hutt City Council for inclusion in their District Plan. There are areas where the guidelines could impact upon development of greenfield areas within the City and closer examination of the consequences is required before the City could consider adopting the guidelines for inclusion in the District Plan.
- On page 85 there is a general recommendation for major projects under the heading of "Emergency Management Measures". Each task within the table has been given a priority and the foot note has suggested completion dates. The tasks have not been considered by Council and many of them require funding or other resources. When considering funding and resources the City has to consider other obligations and therefore the inclusion of the foot note with recommended target dates should be deleted.
- On page 86 Clause 2.4.6 heading "Implementing Non-Structural Measures". The current wording gives the impression that changes to the Upper Hutt City's District Plan will occur immediately. We again emphasise that we consider the non-structural proposals within the plan, as guidelines, which will need to be carefully considered

and therefore implying that District Plan changes will occur immediately could be misleading.

- Environmental strategy. Council has previously advised the Wellington Regional Council that it endorses and supports the vision and principles set down in the draft Hutt River Environmental Strategy.

### Chapter 3:

- No comment.

### Chapter 4:

- Policy 8- "Removing services from stop banks" - page 110. We agree with the need for stop bank integrity but this has to be balanced against practical considerations. In places water and sewer mains have to pass through the stop bank to service areas on the other side of the river. There are also a number of wastewater discharge outlets required as emergency overflow from pumping stations. The policy must recognise **these** services in a similar manner to the way it recognises for need for stormwater outlets.
- Policy 14 clarifying floodplain management planning roles, page 114. The policy states that the Wellington Regional Council will, together with the Hutt and Upper Hutt City Council's facilitate floodplain management planning for the Hutt Valley. This sentence should be reworded to make it clear that Upper Hutt City Council supports the Regional Council in its floodplain management planning but the primary responsibility is with the Wellington Regional Council.
- Policy 16 - Managing the River Bed, page 115. Council is pleased to note that the Regional Council will produce riverbed level management guidelines for the Hutt River. The public are concerned at build-ups of gravel in the river and the possible impact on adjacent infrastructure. For example, in the reach of the river downstream of **Totara** Park Bridge it appears that gravel build-up has caused flood levels to extend closer to the River Road.
- Section 4.3 Non-structural measures, page 119.
  - o Again, the general statement needs to be included that the proposed measures are guidelines to the Upper Hutt City Council and not final measures as implied in the first paragraph to Policy 19. The rest of Policy 19 does refer to the need for flexibility in considering the non-structural measures and this is the theme that should flow right through any discussion within the Plan on non-structural principles.
  - o An example of our concern on the non-structural measures is policy 24. We would agree with the proposal of using flexible mitigation methods however, the policy goes on to list some constraints, particularly the last bullet point, which should not be a restriction on development.
  - o Under clause 4.3.6 land use measures, reference is made to the rate of earthworks and the Upper Hutt City Council having the ability to control the rate of earthworks as requested in the Wellington Regional Council submission on the Upper Hutt City Council proposed District Plan. This statement is premature. Council is still considering the submissions to its proposed District Plan.
  - o Page 130, Critical Facilities. The encouragement of alternative siting for Health Care Facilities and Emergency Services refers to being sited away from higher

and moderate risk floodplains. However, on page 131 under the heading “Moderate and Lower Risk Floodplain Hazard Areas” both these activities have been accepted within moderate floodplain hazard areas. Similarly, for the Key Network Utility Facilities presumably the alternative siting being promoted should be away from both the river corridor and the higher risk floodplain hazard area.

**Chapter 5:**

- Council supports the current Regional Council funding policy for flood protection.

**Chapter 6:**

- Council supports the retention of the Hutt River Floodplain Management Advisory Committee as outlined on page 159, Section 7.5.1.

If it is intended to hold hearings on the submissions to the draft Hutt River Floodplain Management Plan, then Council would like to be heard in support of its submission.

Yours faithfully



Lachlan Wallach  
**DIRECTOR, OPERATIONS**

# Submission 25




*caring about you & your environment*

## MEMORANDUM

26 April, 2001  
File: Env 5/1/1  
Reference?

*Andrew  
looks good -  
well done!*



**To:** Andrew Annakin  
**Copy To:** Alastair Cross  
**From:** Jane Bradbury  
**Subject:** Draft Hutt Valley Floodplain Management Plan

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| <b>For Your:</b> | <b>Action</b> | <b>Comment</b> | <b>Information X</b> |
|------------------|---------------|----------------|----------------------|
|------------------|---------------|----------------|----------------------|

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Thank you for the opportunity to comment on the draft Hutt Valley Floodplain Management Plan.

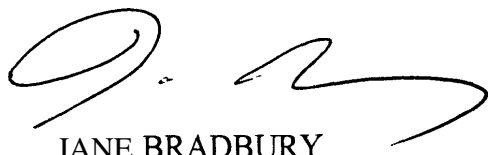
The draft Plan is a very impressive document that is a credit to the staff involved in its preparation. A number of qualities distinguish the Plan, including:

- The benefits of following a good process for preparing the Plan are evident in its contents
- The Plan does a very effective job of integrating broad environmental management with flood protection
- the details of floodplain management and operation are made accessible to the people who may be affected.

Sure, there is scope for change and improvement, but the high standard of the draft Plan will be a good document to build on.

My response to the Plan is also reflected in the feedback I received from staff in the Environment Division. Murray McLea has co-ordinated comments from departments in the Division. These are attached. Murray will also provide you with a marked up copy of the plan that includes some typos and minor editorial changes.

I think there is a lot to be positive about over the way this plan is evolving. We look forward to commenting on the next stage.



JANE BRADBURY





*caring about you & your environment*

## MEMORANDUM

27 April, 2001

File: Env 5/1/1

Reference?

**To:** Jane Bradbury  
**Copy To:** Alastair Cross  
**From:** Murray Mclea  
**Subject:** **Draft Hutt Valley Floodplain Management Plan**

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| <b>For Your:</b> | <b>Action</b> | <b>Comment</b> | <b>Information x</b> |
|------------------|---------------|----------------|----------------------|
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Here are some comments on the draft Hutt Valley Floodplain Management Plan (the Plan) that I have collated from staff in the Environment Division. I will also provide Alistair Cross with a “marked up” copy of the Plan that includes typos and minor editorial changes.

Overall, our feedback is very complimentary. The Plan is very comprehensive and detailed, which befits an operational plan of this type. I think the draft is a step forward from the earlier floodplain plans for the Otaki and Waikanae because of the operational detail that is included. It is a good stepping stone for public consultation that will lead to a final plan.

### **The Environmental Strategy**

The environmental strategy looks as if it will work in very well with the flood protection measures proposed. The will lead to a well integrated plan. You are achieving something that others are finding very difficult to do.

We are currently running a number of projects in the Environment Division that will be able to help implementation of the environmental strategy, eg. riparian management, freshwater ecosystems investigation and enhancement, and education initiatives.

### **Nga Tikanga Maori, tangata whenua aspirations for the River**

The input of Maori into Plan development will be vital to its success. Iwi will need to be closely involved and consulted over many aspects of implementation of the Plan, eg. sites of significance, establishment of native flora and fauna for cultural harvesting. A good start has been made in Chapter 3. It would be helpful to acknowledge the Charter of Understanding as the document that underpins the relationship between the Council and Maori.

### **Floodplain Mangement Planning Issues**

In terms of the way we develop issues in our regional plans we would not consider the issues on page 18 to be statements of issues because they do not identify “problems” that need to be addressed. This contrasts with the issues in section 4 of the Plan, which we would regard as statements of issues.

### **The Use of Figures**

The use of figures such as those between pages 7 to 15 and between 31 and 72 are particularly effective. The more information that can be presented in this way, the better.

### **The Mandate for Floodplain Management Protection**

Greater clarity could be provided on pages 21 and 22 about the status of the Floodplain Management Plan. I found the “legal” status of the Plan a bit uncertain. Floodplain management plans are mandated more by the RFP than the RPS. Saying that “The RPS states that the Regional Council is responsible for producing floodplain management plans” is not quite correct. My concern is that people reading the Plan get the correct picture of where the Plan fits. Further clarification is provided in Appendix 2 but it is important to be clear about the role and status of the Plan on pages 21 and 22. Figure 4 is not very clear. I notice that you intend to include references to the Plan in regional and district plans, which will help.

One important thing that is missing is the identification of regional and district council responsibilities for land use that are directed in section 11.7 of the Natural Hazards Chapter of the RPS. This section of the RPS is the basis for the Council relying on district plan provisions for implementing many of the non-structural options in the Plan. The underlying reasons for our reliance on district plans should be outlined because we could otherwise make the desired land use provisions in our regional plans.

### **Outcomes for the River Corridor Hazard Area**

The table that begins on page 72 identifies action that district council planners will need to take to implement the Plan. We encourage you to provide as much detail as possible in the column “regulate/control”. If you are not able to identify conditions or standards for rules, then district councils will have problems also. Just selecting a few examples may not be sufficient. It is often not until you try and identify the precise contents of rules that you recognise whether a particular approach is feasible or not.

Non complying activities are referred to in the table as a way of controlling activities. You should bear in mind that non-complying activities are determined in the context of the policies that refer to activities. Their successful use in district plans is dependent on the policies that guide activities. Non-complying activities may not exist when the current amendment to the RMA is enacted.

### **By-laws Protecting Flood protection assets**

This matter is a moving target as we continue to work on the TRP. Strictly speaking, the by-laws that protect flood protection assets are regional rules.

|                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------|
| <p style="text-align: center;"><b>Comments on chapter three – Nga tikanga Maori, tangata whenua aspirations for the river</b></p> |
|-----------------------------------------------------------------------------------------------------------------------------------|

### 3.2.2 - Partnership

- The following underlined words could be added

“A good relationship with . . . . . Maori interests and values in managing and providing: input into the Hutt river and its environment.

- You may want to acknowledge the charter of understanding because this further outlines our relationship with iwi of this rohe.
- Does the following cover acceptance of manawhenua and tino rangatiratanga of Iwi to be able to effectively exercise kiatiakitanga, ie partnishop?

“The Plan will take into account . . . incorporating kaitiakitangi into the rivers management”

### 3.2.3 – Aspirations of Tangata Whenua

- Will you be outlining specific areas for re-establishment of native flora and fauna for cultural harvesting? If so will these be consistent with what was there previously and how much input will iwi have in its management?

### 3.3 – Policy outcomes

- What term will you be using to address Te Ati Awa in this document? Will it be;
  - Te Ati Awa or;
  - Te Ati Awa – Taranaki ki te Upoko o te Ika a Maui?
- Is there funding set aside for the review of management of existing sites and cultural significance by Iwi?
- Who will decide where information boards go along river margins outlining information about the area? (ie around sites of significance)
- Would you be looking at plotting any of the information about waahi tapu etc on a GIS mapping system?

### 3.4 – Methods to implement the vision

- Is cultural harvest significant in issues important to Iwi?
- Will heritage orders enable Maori to exercise their tino rangatiratanga over areas protected by this mechanism? Would you look at section 33 of the RMA (transfer

of powers), as an option for management of specific areas, say for cultural harvest?

### 3.5 -- Implementation project

- What kind of management role will iwi be under taking for this project?
- Will your timetable to achieve methods take into account Maori consultation processes? Eg; hui.
- Will their be indicators developed that will address the needs of mana whenua? If so who will develop these?

Keriana Wilcox

## Hutt River Floodplain Management Plan – Consultation Draft

Comments by Rosalind Groves, Hazard Analyst

I think the Draft is a good start. It provides a good indication of what the final Plan will look like. The information presented is comprehensive and I support the overall approach, ie what the Plan is trying to achieve in terms of risk reduction and hazard management.

### General Comments

1. Substantial editing is required to tighten and tidy the Draft (e.g. consistency between ‘this Plan’ and ‘the Plan’), but I’m sure this is part of the general process ahead.
2. Terms used throughout the document such as ‘cumecs’ and ‘risk-based design standard’ need to be properly introduced at the beginning of the Draft and if possible, replaced with a more commonly understood or non-jargon term.
3. Is there consistency between the Regional Policy Statement (‘acceptable risk’) and the Draft (‘residual risk’)?
4. Text boxes should be linked to the main text.
5. Flood hazard maps are very good – clear and nicely presented.
6. ‘Linear Park’ is not explained very well. Is this an existing term from literature or has it been created for the Environment Strategy? If it has been newly created, can a more familiar term be used?
7. The design standard needs better explaining – if it is a 2300 cumec standard, then why are a range of 1900 and 2800 measures included? Clarify.
8. Try to avoid unnecessary acronyms such as ‘ARs’ for ‘anticipated results’.
9. Does the Plan have an associated communication strategy or plan? What about an assessment of risks (e.g. risks to the public, political risks, professional risks) if the Plan doesn’t go ahead as scheduled, or if a major flood happens before some of the works are implemented? (Obviously these are not part of the public Plan)
10. Has the *Risk Management Standard (AS/NZS 4360: 1999)* been used?

### Specific comments

1. The Policy Framework (p24) does not include the Regional Policy Statement (although this is mentioned in the text) and the Regional Civil Defence Plan.

2. P29 – ‘reasonably objective’ sounds a bit iffy. Either the process was objective or it was not. Clarify.
3. P32 onwards – put a legend (or key) on each figure. Flicking back to Reach 1 is distracting.
4. Always put ‘danger to people’ etc BEFORE ‘damage to structures’ (e.g. text box p64).
5. P73-81 explain ‘new property titles tagged’ – what does this mean? Is this under the RMA or s32(b) of the Building Act?
6. P83 Explain what ‘disaster insurance’ means, ie the WRC and City Councils do not provide this, so what is it? I assume it refers to EQC insurance that residential homeowners or occupiers get when they have home and contents fire insurance. Note that flood damage is covered by EQCover, but erosion is not, nor are commercial properties.
7. P85 consider rewording ‘simple enough to provide to the public’ as this sounds condescending.
8. P86 correct ‘Emergency Management Bill 2000’ to ‘Civil Defence Emergency Management Bill 2000’.
9. P88 explain or define ‘kite-flying’.
10. P104 explain the significance of the 100-year flood – why is this important (e.g. historical use around the country, legislative requirement?). Explain how often these different flood types occur – ie the 100-year flood does not occur every 100 years, so what does this mean to the non-flood protection professional?
11. Policy Section does not flow very well and is interrupted by principles and guidelines etc. ‘Accessory building and ancillary structures’ – is it possible to use one term (e.g. accessory OR ancillary) or are these special terms from legislation?
12. P132 as before, explain ‘tagged’ – does this refer to the Building Act at all?
13. Appendix 1 p2 – note that ‘recovery’ goes beyond the scope of civil defence or emergency management and into the realm of Council funding (ie beyond the resources of individual Emergency Management Departments).
14. P4 – correct ‘Ministry for Emergency Management’ to ‘Ministry of Civil Defence and Emergency Management’. Correct ‘National Civil Defence Headquarters’ to ‘National Emergency Operations Centre’, which is in the sub-basement (not the basement) of the Beehive.
15. Note that the Ministry does not ‘provide funding’ for emergency expenditure – this funding comes from a separate appropriation administered by the Department of Internal Affairs. Any proposal will be assessed against the criteria for funding. If a claim is for an amount larger than that in the appropriation then the Ministry

will put up a recommendation to Cabinet (on behalf of the Government, not the local authority) for additional money. There is also a process for recovery funding – a local authority puts forward a proposal for funding to the Ministry (according to criteria outlined in the National Civil Defence Plan). The Ministry will assess the proposal and put up a recommendation for funding (or not) to Cabinet (on behalf of the Government, not the local authority).

16. Appendix 2 – should this mention the Civil Defence Act or s32 of the Building Act? Sections 221 and 224 of the RMA are not discussed – should they be?

## Flood Warning System

*Just a few changes  
to be made to Appendix 1.  
Mike H.*

### Existing System

The flood warning system for the Hutt River consists of rainfall recording stations and river level recorders. These recorders send data through to the Regional Council flood base, located at the Regional Council Centre. Flood forecasts and flood warnings are generated and passed on to people who are potentially affected. Figure 3 provides an overview of this process.

### Flood Detection

*Seven*

There are nine rainfall recording stations relevant to the Hutt River. ~~Five~~ of these stations are telemetered.

Rainfall recording stations trigger alarms at certain intensities of rainfall.

|                                                |                         |
|------------------------------------------------|-------------------------|
| <i>Cemetery (Akatarawa Valley)</i>             | <i>20mm/2hr</i>         |
| Phillips Station (Kaitoke headwaters):         | 20mm in a 2 hour period |
| Warwicks Station (Akatarawa Hill Road summit): | 15mm in a 2 hour period |
| Centre Ridge Station (Rimutaka Incline):       | 20mm in a 2 hour period |
| Te Marua Station (Treatment Plant):            | 20mm in a 2 hour period |
| TVL Station (Mangaroa Valley):                 | 20mm in a 2 hour period |
| <i>Maber Rd (Avalon)</i>                       | <i>20mm/2hr</i>         |

These alarms are automatically transmitted back the Regional Council flood base. The information is then fed into a flood-forecasting model which forecasts the river heights for a period of up to 12 hours.

Nine river level recorders measure the height of the river, and ~~six~~ *seven* of these are telemetered. The telemetered river level recorders are located on the Hutt River at Kaitoke, Te Marua, Birchville and Taita Gorge, as well as on the Akatarawa and Mangaroa rivers. Non-telemetered recorders are located on the Whakatikei River, Pakuratahi River, and ~~Waiwhetu Stream~~ *Waiwhetu stream is now telemetered*.

The Birchville river level recorder is backed up by an alternative interophone system.

### Flood Warning Time

The flood warning time is how long a person subject to a flood has to react. The warning time is determined by the time taken to detect flooding, recognise its characteristics, and issue warnings.

The approximate warning times for the Hutt River once a rainfall alarm has been activated are:

|               |            |
|---------------|------------|
| Kaitoke:      | 1:30 hours |
| Birchville:   | 3:00 hours |
| Tai ta Gorge: | 3:45 hours |
| HCC Car Park: | 4:30 hours |
| Harbour:      | 5:00 hours |