

08 May 2017

Proposed Plan Change 42
Level 1 Reception
Upper Hutt City council
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Upper Hutt

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Dear Sir/Madam,

Submission on proposed Plan Change 42: Mangaroa and Pinehaven flood hazard extents

Please find enclosed the Greater Wellington Regional Council's submission on proposed Plan Change 42: Mangaroa and Pinehaven flood hazard extents.

Please feel free to contact me on 06 826 1541 or caroline.watson@gw.govt.nz if you have any questions or concerns.

Yours sincerely

Caroline Watson
Policy Advisor, Environmental Policy
Greater Wellington Regional Council

Encl: Submission

Greater Wellington Regional Council: Submission

To:	Upper Hutt City Council
Submission on:	Plan Change 42: Mangaroa and Pinehaven flood hazard extents

1. Reason for submission

- 1.1 The Greater Wellington Regional Council (GWRC) wishes to make a supportive submission on proposed Plan Change 42 subject to Schedule 1 Section 6 of the Resource Management Act 1991 (RMA).
- 1.2 GWRC supports proposed Plan Change 42.
- 1.3 The primary reasons for supporting proposed Plan Change 42 are:
 - The identification of areas of flood and erosion hazard, and provisions to avoid inappropriate development in areas of high hazard risk; and
 - The inclusion of provisions to manage the flood risk.

2. Policy framework

- 2.1 In assessing proposed Plan Change 42 for consistency with the Regional Policy Statement (RPS), GWRC is particularly interested in how the plan change will support and contribute to achieving the sustainable management of natural and physical resources in the Wellington region.

Regional Policy Statement for the Wellington Region

- 2.2 The RPS gives guidance on the future direction for the sustainable management of natural and physical resources in the Wellington region. The RPS sets out objectives and policies to address regionally significant issues.
- 2.3 The first group of RPS policies are directive to local authorities and require provisions to be included in district or regional plans. The second set of RPS policies need to be given particular regard to when assessing and determining a resource consent, notices of requirements, or when changing, varying or replacing city, district or regional plans. Many of the regulatory policies will cease to have effect once the directive policies are given effect to through district or regional plans.
- 2.4 The provisions from the RPS which are relevant to this plan change are:
 - Policy 29 is directive to regional and district plans to identify areas at high risk from natural hazards and to avoid inappropriate subdivision and development in those high hazard areas.
 - Policy 51 is a consideration policy which requires the minimisation of the risks and consequences of natural hazards.

3. Comments

Our support for the plan change

- 3.1 Greater Wellington Regional Council supports proposed Plan Change 42 which addresses provisions for flood and erosion hazard areas in Pinehaven and Mangaroa.
- 3.2 Proposed Plan Change 42 is supported for a number of reasons including that this plan change gives effect to the RPS by identifying areas at high risk from natural hazards and introduces new objectives, policies and rules to manage land use and subdivision activities to address flood risk. This is consistent with RPS policy 29 which seeks that inappropriate subdivision and development is avoided in areas at high risk from natural hazards.
- 3.3 An aspect of the proposed plan change which is particularly supported is that it introduces planning measures to reduce flood risk from future development in the Pinehaven catchment, and it enables future structural infrastructure improvements to be undertaken in the Pinehaven Stream. These works are to be carried out in accordance with the Pinehaven Stream Floodplain Management Plan which seeks to proactively manage the risk of flooding in the Pinehaven catchment. The planning measures contained in proposed Plan Change 42 are essential to ensure that the proposed structural improvements continue to be effective in achieving the agreed reductions in flood risk to the community.
- 3.4 GWRC also supports Policy 9.4.8 in proposed Plan Change 42 which seeks that earthworks in identified flood hazard and erosion areas are designed to minimise erosion and sediment loss to streams and rivers. In particular, GWRC supports the text in the policy that “there are amenity, ecological and water quality benefits that are derived from controlling sediment runoff from earthworks”. This is consistent with RPS policies 15 and 41 which seek that district plans include provisions to control earthworks to minimise erosion and silt and sediment runoff to water to protect ecosystem health.
- 3.5 GWRC also supports the retention of existing policies and rules that support GWRC and UHCC undertaking the structural works signalled in the Pinehaven Stream Floodplain Management Plan.

4. Relief sought

- 4.1 Should the Upper Hutt City Council approve proposed Plan Change 42, GWRC requests that:
- 4.2 Our support is noted and proposed Plan Change 42 is approved as notified.

5. Further involvement

- 5.1 GWRC recommends that the points as outlined above be considered. We would also welcome the opportunity to clarify, provide support where required and further discuss the matters raised.
- 5.2 GWRC wishes to be heard in support of its submission.

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Matthew Hickman
Manager, Environmental Policy

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