

HRFMP : Summary Sheet**Submitter:****J O’Kane****Submission number:****1****Submission Summary*****Issues Related to Consultation Draft:***

- 1.a Basic structure, content and information provided is fine. The language is not complicated and the Consultation Draft is easy to understand, helpful and will be useful.

Other Matters:**Relief Sought:**

- 1.1 The Consultation Draft is too long – it should be more concise.

Flood Protection Group Response:

- 1.a Self-explanatory.
- 1.1 Further editing, including guidance from a professional editor, will be used to help streamline the document. However, there is limited opportunity to compress the information contained in the Consultation Draft.

Recommended Relief to Deal with Issues Raised:

- 1.1 Consider streamlining the document where possible.

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Submitter: G Dixon

Submission number: 2

Submission Summary

Issues Related to Consultation Draft:

- 2.a Suggests that newsletter 6 should have provided a more detailed summary of the Consultation Draft.

Other Matters:

- 2.b Referred to repair works at Manor Park.

Relief Sought:

Note: Relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 2.a Acknowledged submitter's comments, explained the Flood Protection Group's approach to Newsletter 6.
- 2.b Work at Manor Park is complete and the submitter needs to be contacted to be advised of this.

Recommended Relief to Deal with Issues Raised:

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Submitter: A Pointon

Submission number: 3

Submission Summary

Issues Related to Consultation Draft:

- 3.a The technical matters in the Consultation Draft make sense and are represented in adequate detail, although the document lacks additional specific information regarding environmental improvements. Language is uncomplicated and information and graphics reasonably well presented. Engineering aspects of the draft are well presented.
- 3.b Main concerns regard proposed environmental improvements which may deny vehicle access to the river. Recreationally undeveloped areas should remain open and available to all forms of recreational pursuit, and vehicle tracks should be maintained.

Other Matters:

- 3.c Sites recently closed for vehicle access should be re-opened (including Pomare Bridge, Whakatikei, and Moonshine; with removal of 'concrete blocks, steel gates and other eyesore improvements').
- 3.d Also refers to education and prosecution for river berm car and rubbish dumping offenders; and vehicle track maintenance in the Akatarawa Catchment.

Relief Sought:

- 3.1 References to 'vehicle restriction' and 'rationalising vehicle access' to be removed from all text and policy (draft Plan and Environmental Strategy).
- Note: Additional relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 3.a The Consultation Draft is a strategy document based on feasibility design rather than detail. It refers to other documents where additional information on the selected measures and the Environmental Strategy is contained. Furthermore, much additional detail regarding specific measures, detailed design work or environmental enhancement projects is still to be developed, and requires public involvement. Finally, increasing overall detail in the Draft Plan may not be wise given the size of the present document.

Submitter: Submission number:	A Pointon 3
<p>Flood Protection Group Response cont.</p> <ul style="list-style-type: none"> • 3.b The Environmental Strategy has been developed in full consultation with the Hutt Valley community. The Strategy's long-term vision for managing and developing the Hutt River environment have been set, including general policy on river environment use. The vision requires a balanced approach to rationalising vehicle access, reflecting the views of the Hutt Valley community provided to WRC during consultation on the Strategy. Specific detail affecting localised vehicle access will be dealt with on a reach by reach basis as environmental enhancement projects are developed, or as appropriate. <p>The appointment of a river ranger to the Hutt in 2002/03 will enable effects of vehicle access to be more closely monitored. However, vehicle impacts on the riverbed and uses of this environment are issues requiring ongoing public discussion and improved monitoring information.</p> <p>Note: Concern was expressed by the Hutt Valley Angling Club in particular about the effects of vehicle activity in the river bed on the trout fishery. Alleged impacts include damage to the invertebrate community which provides a major food source for fish. These concerns relate not only to effects on recreational values, but also to the intrinsic value of the fishery itself. The Flood Protection Group's Environmental Code of Practice, endorsed by the Wellington Fish & Game Council and Department of Conservation, includes minimising vehicle crossings to avoid these effects.</p> <p>Furthermore, the long-term operations and maintenance consents for the Hutt River has also picked up on fish management issues, requiring a minimum number of pool-riffle-run sequences to be maintained as an indicator of trout habitat presence.</p> <ul style="list-style-type: none"> • 3.c Recently closed sites: this is a response to nuisance effects, of speeding vehicles and rubbish dumping. • 3.d Self-explanatory. • 3.1 We believe the Environmental Strategy document has the right balance with regard to vehicles and access. The Strategy is already in place. Relevant policy in the Draft Plan also needs to reflect a balanced approach to recreational use. 	
<p>Recommended Relief to Deal with Issues Raised:</p> <p>Accepting in part:</p> <ul style="list-style-type: none"> • 3.1 References in the Environmental Strategy to vehicle access restrictions and rationalising access should remain, but ensure that Draft Plan policy reflects: <ul style="list-style-type: none"> - appropriate balance between recreational uses, minimising adverse amenity, nuisance and ecological effects, and considering appropriate uses on a reach by reach basis. 	

Submitter:	A Pointon
Submission number:	3
Recommended Relief to Deal with Issues Raised cont.	
<ul style="list-style-type: none">- decisions regarding vehicle access to the riverbeds and river environment being determined on a reach by reach basis as enhancement projects are developed, and following further public discussion and gathering of monitoring information.- clarify Policy 29 to reflect the above comments.	

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Submitter: A Pope

Submission number: 4

Submission Summary

Issues Related to Consultation Draft:

- 4.a The Consultation Draft is well presented, useful and important, but requires further detail of intended works.

Other Matters:

- 4.b Supports exclusion of vehicles and motorbikes and establishing a high priority for commencing environmental enhancement works on the Avalon to Pomare reach.

Relief Sought:

- 4.1 Including a stopbank cross-section diagram, plus a comparison with existing banks (particularly relating to the Ava to Ewen reach).
- 4.2 Explanations of key terminology, like left and right bank, throughout the document.
- 4.3 Identify locations more clearly (e.g. Woollen Mills corner).

Flood Protection Group Response:

- 4.a The Consultation Draft is a strategy document based on feasibility design rather than detailed design. It refers to other documents where additional information on the selected measures and the Environmental Strategy is contained. Furthermore, much additional detail regarding specific measures, detailed design work or environmental enhancement projects is still to be developed, and requires public involvement. Finally, increasing overall detail in the Draft Plan may not be wise given the size of the present document.
- 4.b Avalon to Pomare will be considered under the Environmental Strategy but the structural works priority for this reach is not high.
- 4.1–4.3 are self-explanatory.

Submitter:	A Pope
Submission number:	4
Recommended Relief to Deal with Issues Raised:	
Accepting in part:	
<ul style="list-style-type: none">• 4.1 Including indicative stopbank cross-section diagrams, but not for each reach.	
Accepting:	
<ul style="list-style-type: none">• 4.2 Including more explanations of key terminology (like left and right bank), through the document on advice from a professional editor.• 4.3 Identifying locations more clearly (e.g. Woollen Mills corner).	

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Submitter:

B Bruce

Submission number:

5

Submission Summary

Issues Related to Consultation Draft:

Consultation Draft:

- 5.a The Consultation Draft makes sense, covering well the long-term maintenance and safety of the Hutt floodplain.

Other Matters:

- 5.b Plantings are making riverbanks attractive walking areas.

Relief Sought:

No relief requested.

Flood Protection Group Response:

- 5.a and 5b are self-explanatory.

Recommended Relief to Deal with Issues Raised:

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Submitter:	A Gibb
Submission number:	6

Submission Summary

Issues Related to Consultation Draft:

Other Matters:

- 6.a Passes thanks for flood damage repair works in the Ava to Estuary reach, and recent Ava to Ewen works public meeting.
- 6.b Concerned about state of stormwater outlets, and design.
- 6.c Requests 'dredging of river shingle' downstream of Ava bridge, and increasing stopbank height and strength in response to global warming.
- 6.d Recognise downstream impacts of the Ava to Ewen works.

Relief Sought:

Note: Relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 6.a Self-explanatory.
- 6.b Stormwater outlet design is the responsibility of the respective City Councils. The submitter's concerns will be forwarded to Hutt City Council.
- 6.c The management of gravel is a major issue recognised in the Consultation Draft. There are current proposals for extraction in the lower river. The effects of global warming is recognised in the design standard. Submission 9 covers this matter and recommends appropriate policy.
- 6.d Impacts of Ava to Ewen works will be recognised through the resource consent process.

Recommended Relief to Deal with Issues Raised:

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Submitter: Safeway Storage

Submission number: 7

Submission Summary

Issues Related to Consultation Draft:

- 7.a Insufficient detail in the Consultation Draft regarding structural measures proposed for the Boulcott reach, parties affected and alternatives considered.
- 7.b Concerned that Safeway Storage has not been adequately consulted on proposed works.

Other Matters:

- 7.c Had requested further information on works and affected land in the Boulcott reach (e-mail response from Alistair Cross: 28 March 2001), but feels the information provided is insufficient.

Relief Sought:

- 7.1 Including in the Draft Plan Safeway Storage land affected by structural works.
- 7.2 Provide detailed information regarding proposed works affecting the submitter's land, and the associated resource consent process.
- Note: Additional relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 7.a The Consultation Draft is a strategy document based on feasibility design rather than detailed design. It refers to other documents where additional information on the selected measures and the Environmental Strategy is contained. Furthermore, much additional detail regarding specific measures, detailed design work or environmental enhancement projects is still to be developed, and requires public involvement. Finally, increasing overall detail in the Draft Plan may not be wise given the size of the present document.
- 7.b Safeway Storage were sent newsletters on developing the design standard and associated measures. These newsletters invited response regarding issues of concern, and called for submissions in August 1999 on the design standard and measures. Safeway Storage did not make a submission. Safeway Storage needed to respond during this phase, to signal the Regional Council to enter into more detailed consultation with them.
- 7.c The information provided at the time represented the detail available.

Submitter: Submission number:	Safeway Storage 7
Flood Protection Group Response cont. <ul style="list-style-type: none"> • 7.1 and 7.2 The Regional Council does not anticipate any impact on the Safeway Storage property from proposed structural works, although road access may be affected. The Regional Council is happy to discuss any known detail with Safeway Storage. Detailed design work will only take place once preliminary design and resource consent investigations commence for this reach in 2006/07. These investigations will involve specific discussions with affected land owners. 	
Recommended Relief to Deal with Issues Raised: <p>Declining:</p> <ul style="list-style-type: none"> • 7.1 No Safeway Storage land will be affected. <p>Accepting:</p> <ul style="list-style-type: none"> • 7.2 Providing additional detail on proposed works as it comes to hand. 	

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Submitter:

Residents of Hathaway Ave

Submission number:

8

Submission Summary

Issues Related to Consultation Draft:

- 8.a Compliment WRC staff on work that has gone into this document.
- 8.b Concerned that the Consultation Draft seems to indicate a 'completed plan' and an agreed alignment for a stopbank through Boulcott and Hutt Golf Courses.

Other Matters:

- 8.c Strongly supportive of commencing gravel extraction in the Boulcott area.

Relief Sought:

- 8.1 Inserting a table into 2.2.2 providing for each set of works a timetable for preliminary design, resource consent processes and associated consultation.
- 8.2 Including reference that a stopbank option incorporating Harcourt-Werry Drive has been considered, but a final decision requires costings to be completed.
- 8.3 The two possible options discussed to date, including a preferred option of a 'stopbank with flat batters meandering through the golf courses', be incorporated into the Plan, with appropriate wording regarding the status of these options.
- 8.4 Providing description of 1900 and 2800 cumec flood, chances of the 100 year flood and stopbank profile in the glossary, and linking the glossary to Table 1.
- 8.5 Moving Executive Summary page viii ('Who Should Use This Plan') to page i, and using page numbers instead.
- 8.6 Moving the Contents to precede the Executive Summary, and the Appendices referred to in the Contents.
- 8.7 Improve links between section 2.2.2. and the revised priority schedule – pg 30.
- 8.8 Taking care with the use of abbreviations.

<p>Submitter: Submission number:</p>	<p>Residents of Hathaway Ave 8</p>
<p>Flood Protection Group Response:</p> <ul style="list-style-type: none"> • 8.a and 8.c are self-explanatory. • 8.1 Specific indications of the timing of structural works can only be provided for the present works programme established to 2010 in the current WRC Long-term Financial Strategy. • 8.2 The Harcourt-Werry Drive option is not desirable because it would reduce the floodway's buffering capacity, exposing Lower Hutt to a higher risk of stopbanks breaching, and be more expensive to construct. • 8.b, 8.3 Stopbank alignment between Rentokil property and Kennedy-Good Bridge is to be determined through the design and consent processes in consultation with Hutt and Boulcott Golf Clubs and affected residents. Given the uncertainties regarding alignment options, it is best to omit possible alignments from Section 2.3. • 8.4–8.8 are self-explanatory. 	
<p>Recommended Relief to Deal with Issues Raised:</p> <p>Accepting in part:</p> <ul style="list-style-type: none"> • 8.1 Section 2.2.2 (pg 28): Providing clearer statements about preliminary design and resource consent investigations preceding works for each reach, in Chapter 2. • 8.2 Section 2.3 (pg 39): Including statements regarding consideration of the Harcourt-Werry Drive alignment in accordance with the discussion above. • 8.3 Remove alignment shown in the Consultation Draft, and add a note reflecting Flood Protection Group's response discussion (8.3), under stopbank: Left Bank (pg 40). • 8.6 Moving the Contents to precede the Executive Summary – in accordance with editing / formatting decision on recommendation from typesetters. <p>Accepting:</p> <ul style="list-style-type: none"> • 8.4 Providing a description of 1900 and 2800 cumec flood, and the chances of flooding (1900–2800 cumec flood) in the Glossary. Linking Table 1 and footnote 19 to the Glossary. • 8.5 Moving Executive Summary page viii ('Who Should Use This Plan') to page i. • 8.7 Improving links between Section 2.2.2 and the Priority Schedule table (pg 29), drop column 1 (Item) and rearrange the reach order according to ranking. • 8.8 Ensuring all abbreviations are provided in full where they are used for a first time, or sporadically through the document. 	

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Submitter: Winstone Aggregates

Submission number: 9

Submission Summary

Issues Related to Consultation Draft:

- 9.a Policy 9 relating to management and protection of utilities and services in the river corridor does not cover the Hutt mouth extraction operation.

Other Matters:

- 9.b The Mouth to Estuary reach design alignment (right bank) cuts across Winstone Aggregates extraction site, passing through the existing processing site. The proposed alignment will 'significantly affect' the sand extraction operation (part of WRC current river management), with potential impacts including re-siting the plant, existing boat moorings and local utilities.

Relief Sought:

- 9.1 That reference to the Hutt mouth gravel extraction operation be made in Policy 9, covering changes to the site and associated funding required.

Flood Protection Group Response:

- 9.a–9.1 Policy 9 only relates to managing utilities and services in the river corridor. These include such entities as telecommunications, energy, water supply and waste-water. Gravel extraction operations are not intended to be covered by this policy, because it is a channel management issue.

Therefore, reference to the Hutt mouth gravel extraction operation in Policy 9 is not appropriate. However, discussions with the submitter regarding the implications of the hydraulic line for extraction operations should be continued. Furthermore, a general strategy covering the submitter's concerns needs to be developed. The strategy would work towards the achievement of the hydraulic line and may cover:

- managing potential changes to the site.
- cost share issues.

More specific detail would be signalled at the preliminary works design stages.

An additional policy needs to be added concerning the requirement to manage gravel in the Hutt River for flood protection, including the river mouth extraction operations.

Submitter: Submission number:	Winstone Aggregates 9
Flood Protection Group Response cont. <ul style="list-style-type: none"> • 9.b The Mouth – Estuary design alignment is the most appropriate for minimising potential flood hazard effects on the left bank river margin, and providing the optimum waterway to reduce backwater at the Mouth of Waiwhetu Stream. Its preference has been long established. This hydraulic line is marked on the ground by two red buoys and four white marker posts. It is also represented on Planning Map 6 in the Regional Coastal Plan, which was consulted on during the mid 1990s. It is the Flood Protection Group's understanding that Winstone Aggregates are aware of the hydraulic line and the Regional Council's desire to achieve the design alignment. 	
Recommended Relief to Deal with Issues Raised: <p>Accepting in part:</p> <ul style="list-style-type: none"> • 9.1 An additional policy be added concerning the requirement to manage gravel in the Hutt River for flood protection, including the river mouth extraction operations. Reference to the Hutt mouth gravel extraction will not be made in Policy 9. <p>Continue discussions with the submitter and form a general strategy as discussed in 9.a–9.1 above.</p>	

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Submitter:	Western Ward Committee, Lower Hutt
Submission number:	10

Submission Summary

Issues Related to Consultation Draft:

- 10.a Acknowledges 'professional and dedicated' consultation effort by WRC officers and Councillors.
- 10.b Provided a positive response to the planning approach and raised general questions regarding Consultation Draft structure, content, information and ease of use.

Other Matters:

- 10.c 'Commends' the Environmental Strategy.
- 10.d Requests immediate work repairing erosion at Carter and Owen Streets, and moderating vehicle access upstream of Belmont Flat, and property purchase near Belmont Hall.
- 10.e Reach 3: regarding inconvenience of flooding at Block Road - with solutions needing consideration by both Transit and WRC as part of the current upgrade of State Highway 2. Requests reassurances that these matters are being considered by both parties.
- 10.f Reach 4 and 5: supporting agreed measures.
- 10.g Reach 6: requesting remedies for houses most at-risk, including house raising and improved emergency management.
- 10.h Discusses timing of capital projects to lessen impacts on rate payers.

Relief Sought:

- 10.1 There is a need to deal with stormwater build-up including additional pumping, maintenance, and ensuring a higher level of emergency management in affected areas (e.g. Pharazyn Street).
- Note: Additional relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 10.a–c are self-explanatory.
- 10.d–h The Regional Council recognises that the Western Ward Committee is a useful and highly valued group to work with on a host of local flooding and river management issues including those raised in this submission. The issues raised here are already identified under operational elements in the Consultation Draft.

Submitter: Submission number:	Western Ward Committee, Lower Hutt 10
Flood Protection Group Response cont. <ul style="list-style-type: none"> • 10.1 There is yet no policy in Chapter 4 which deals with stormwater management issues. While there is an obvious connection with river flooding, stormwater management is the responsibility of the City Councils. While it is not appropriate for the Plan to address specific City Council stormwater network and maintenance issues, it is appropriate to discuss wider responsibilities and assessment as they may relate to river flooding. 	
Recommended Relief to Deal with Issues Raised: <p>Accepting in part:</p> <ul style="list-style-type: none"> • 10.1 Including new policy regarding stormwater management covering: <ul style="list-style-type: none"> - the split in responsibilities and areas of overlap between the Regional and City Councils. - assistance and information that WRC may provide the City Councils in assessing stormwater flooding issues. <p>New policy would be developed in consultation with Hutt City and Upper Hutt City Council officers.</p> <p>Set up a framework for ongoing community partnership in implementing the HRFMP.</p> <p>Consider adding the noted Belmont property (refer to 10.d) to the recommended property purchase schedule.</p>	

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Submitter:	Combined Horse Clubs of Upper Hutt
Submission number:	11

Submission Summary

Issues Related to Consultation Draft:

Other Matters:

- 11.a The submission relates to earlier submission on the Environmental Strategy regarding uses of river environment land (ref. subs 37: Environmental Strategy database).
- 11.b Concerned that horse riding and grazing does not enjoy the same level of consideration for land use in the river environment, as do other sports.
- 11.c Requests a 'small area' of land at Totara Park be permanently set aside for grazing in the river environment. This will enable 'long-term management plans' to be made for their continued use of the river environment. (Issue raised in former submission on Environmental Strategy).
- 11.d Should land be set aside for grazing, then the submitter wishes to work with WRC to establish improvements for that land. They would seek financial and logistical assistance to enable improvements to occur including weed control and fencing.
- 11.e Opposed to developing wetlands in the Totara Park area because of the potential threat of mosquito infestation.

Relief Sought:

- 11.1 Horse riding and grazing should receive the same level of consideration as do other sports.

Flood Protection Group Response:

- 11.a–11.b The Flood Protection Group's response to their earlier submission on the Draft Environmental Strategy noted the concerns raised.
- 11.c More detailed proposals of land for horse grazing are required, noting that the exclusive and permanent allocation of potentially high amenity public land for such use is unusual. It should be noted that the proposed use does not necessarily mix well with other public uses, such as walking. This area of the Whakatikei – Maoribank reach has been highlighted in the Environmental Strategy as having high potential for developing ecosystem values.
- 11.d Decisions regarding more permanent horse grazing and access requested at Totara Park requires, in the first instance, further discussion with the Regional and City Councils.
- 11.e Relevant pest management issues will need to be considered closer to the time.

Submitter:	Combined Horse Clubs of Upper Hutt
Submission number:	11
Recommended Relief to Deal with Issues Raised:	
<ul style="list-style-type: none">• 11.1 Ensuring the draft Plan policy reflects an appropriate balance between recreational uses, minimising adverse amenity, nuisance and ecological effects, and considering appropriate uses on a reach by reach basis.	

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Submitter: Wellington City Council

Submission number: 12

Submission Summary

Issues Related to Consultation Draft:

Other Matters:

- 12.a This submission's chief focus is the issue of costs and benefits in relation to funding policy, the approach used to derive the funding split for flood protection, and the funding proportions.
- 12.b The submitter endorses the 'Regional Council's response to local community concerns over flood protection in the Hutt Valley', and the Advisory Committee as the appropriate structure to represent beneficiaries and stakeholders. However, there are concerns that the Committee does not represent 'those paying most for the benefits of flood protection'. Wellington and Porirua Cities 'are not substantial beneficiaries and therefore should not bear substantial costs'.
- 12.c The way floodplain management for the Hutt will be funded 'has little relationship with the analysis of who benefits in the WRC Funding Policy and even less with the Floodplain Management Plan'. The Consultation Draft analysis of benefits from works are related almost entirely to the Hutt floodplain. The submitter suggests that the Consultation Draft is, therefore, at odds with WRC funding policy.
- 12.d States that Wellington City ratepayers funding of flood protection works (approx. 33%) 'is unfair, has no credible logic and has the appearance of opportunistic burden shifting', with a wealth transfer to ratepayers outside the floodplain. The City Council believe that 'in order to optimise people's location decisions, they should face the true costs of those decisions'. Otherwise, communities are encouraged to take on more risk, generating demands for flood protection.
- 12.e The submission provides a summary of the funding policy analysis process prescribed by s1220 of the LGA, and comments on the Regional Council's determination of step 1 to 3 cost allocation based on the distribution of benefit (s122E 1a). The method of determining benefit to the 'economic catchment', the proportion of total funding benefit (businesses located on the floodplain) is also challenged, as well as the 'confusing' step 1 to 3 cost allocation approach. The submitter suggests there is 'no evidence' that WRC assessed the ability of the regional community to pay in accordance with s1220(1)(d) (fairness and equity).

Submitter: Submission number:	Wellington City Council 12
<p><i>Other Matters cont.</i></p> <ul style="list-style-type: none"> • 12.f The submitter maintains that a more refined level of flood hazard information now makes it possible to analyse benefits to floodplain residents to a more appropriate degree. The submitter also states that further fine-tuning of the rates burden should be possible, as demonstrated by the Stadium Rate and the Regional Transport Rates. Comments relating to environmental and amenity benefits, and sense of community, and a rudimentary assessment of economic benefit are also provided. • 12.g WCC agrees with the analysis of benefits, requesting that it be applied to flood protection in general. • 12.h Requests that: <ul style="list-style-type: none"> - Regional Council consider the Advisory Committee's own (Priority Schedule) analysis, and allocate costs in a way that is 'fair, transparent, efficient'; allocating costs to 'actual beneficiaries'. - Any discussion in the Plan of regional:local cost allocation needs to be clearer. 	
<p>Relief Sought:</p> <p>Note: Relief sought does not relate to the Consultation Draft.</p>	
<p>Flood Protection Group Response:</p> <ul style="list-style-type: none"> • 12.a–h The majority of the WCC submission covers funding policy issues and the corresponding S:122 analyses. In the current policy framework, the WRC covers these matters through its annual plan and Long-term Financial Strategy processes. Accordingly, response to this submission should not be dealt with by the Advisory Committee. Consequently, a letter was sent to Mr Poole, Chief Executive, WCC, identifying the annual plan process as the appropriate forum for discussing funding policy matters. 	
<p>Recommended Relief to Deal with Issues Raised:</p> <ul style="list-style-type: none"> • 12.1 No further action by the Advisory Committee. 	

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Submitter:	Transpower New Zealand Ltd
Submission number:	13

Submission Summary

Issues Related to Consultation Draft:

- 13.a Transpower has two major assets in the River Corridor, including Melling substation and Haywards–Melling B, 110kv transmission line.
- 13.b It is important that the Plan 'strikes a balance between 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'.
- 13.c Submitter generally supports the Consultation Draft's purpose, and the 'shift in responsibility' for managing non-structural measures to the City Council, but has concerns relating to proposed measures and policies.
- 13.d: Policy 9 (Chapter 4) – managing and protecting utility services in the river corridor: refers to guidelines (Section 4.2.4) which have not been included in the Plan.
- 13.e Policy 20 (Chapter 4) – developing balanced measures appropriate for the Hutt Valley: is supported.
- 13.f Non-structural measures should not 'unnecessarily restrict' the operation, maintenance and upgrading of the Melling substation. Transpower intends to generally upgrade new facilities at Melling to the 2800 cumec standard. Statements are also made regarding the definition of 'new development'.

Other Matters:

- 13.g It is inappropriate for planning of structural protection to ignore the Melling substation. The substation 'should not be penalised for being located within the stopbanks', and adapting structural works to protect the substation should be considered.
- 13.h The impact on the Melling site of proposed stopbank (Connolly Street) and retaining wall (Safeway Storage) works is unknown because detail on their exact nature and location is not provided.

Relief Sought:

- 13.1 More detailed information on the proposed measures.
- 13.2 Upgrading facilities at Melling should be considered as a permitted activity, because of Transpower's intentions to comply with the 2800 cumec standard.

Submitter: Submission number:	Transpower New Zealand Ltd 13
<p>Flood Protection Group Response:</p> <ul style="list-style-type: none"> • 13.a Self-explanatory. • 13.b The Flood Protection Group acknowledges Transpower’s desire for balance. Discussion and recommendations on 13.1 and 13.2 cover this matter in more detail. • 13.c Self explanatory. • 13.d The Draft Utilities and Services Policy will deal with this matter. • 13.e Self explanatory. • 13.f The proposed Non-structural outcomes references to any resource consent activity status is only indicative at this stage. The outcomes represent specific applications of the Non-structural Principles broad intentions. The Non-structural Principles and associated outcomes ultimately require further analysis to determine their feasibility. This will happen during the initial stages of considering appropriate objectives, policies, and methods earmarked for any district plan changes. <p>The intention of Non-structural Principles regarding 'new and redeveloped key facilities' is to target only new development or substantial redevelopment of existing facilities. The detail of definitions concerning redevelopment would need to be formed in consultation with utility service providers, to ensure that any controls were reasonable and practical.</p> <ul style="list-style-type: none"> • 13.g All utility service owners were consulted during the development of the design standard and associated structural measures. The feasibility of stopbank protection for Melling has been considered by the Regional Council. An alignment which protects Melling substation would result in a stopbank at risk from erosion, and a very limited waterway area. Given the design constraints, any stopbank would be costly to construct. The Regional Council has worked with Transpower to agree a strategy to minimise flooding effects at the substation. • 13.h The proposed stopbank alignment does not directly affect Transpower land. Detailed design and land purchase requirements for the Melling-Boulcott will be determined at the preliminary investigation phase. All adjacent landowners, including Transpower, will be involved in the investigations phases, and subsequent resource consent process. • 13.1 Self-explanatory. • 13.2 Transpower's request for a permissive stance towards the upgrading and associated flood proofing of the Melling infrastructure needs to be considered in the future development of non-structural measures and the Utilities and Services Policy. Regarding the latter, options relating to relocation have been considered and rejected by Transpower and the Regional Council. Furthermore, a proposed long-term upgrading strategy has been agreed with Transpower. The Draft Utilities and Services Policy includes Melling substation having a special status as an existing utility installation in the floodway. 	

Submitter:	Transpower New Zealand Ltd
Submission number:	13
Recommended Relief to Deal with Issues Raised:	
Accepting:	
<ul style="list-style-type: none">• 13.1 Providing Transpower the opportunity to be briefed on proposed structural works in the vicinity of the Melling site.• 13.2 Considering Transpower's request in the future development of non-structural measures.	

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Submitter: Hutt Valley Angling Club

Submission number: 14

Submission Summary

Issues Related to Consultation Draft:

- 14.a The Hutt River Floodplain Management Plan needs to recognise the river as a 'natural resource treasured for its intrinsic values as a living river ecosystem including a viable wild trout fishery'.

Other Matters:

Relief Sought:

- 14.1 Section 1.3.1 (pg 18) – add:
 - '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'.
- 14.2 Section 1.3.3: Enhancing Environmental Values (pg 19) – modify to: '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'.
- 14.3 Section 2.5.2 (pg 87) – modify to: 'Maintains and enhances the intrinsic value of the river environment'.
- 14.4 Section 2.5.4 (pg 88) – High Priority – add: 'to rationalise vehicle access and ban vehicle access to the river bed as required by Part III Section 9 "Restrictions on use of land" of the Resource Management Act'.
- 14.5 Policy 12 (pg 112) – add: 'monitoring the effects of the environmental performance standards and construction practices'.
- 14.6 Policy 16 (pg 115) – add:
 - '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'.
- 14.7 Section 4.3.6 (pg 133) – Voluntary Actions: Upper Catchment – add: 'monitoring and reporting water quality for class FS water as specified in the Resource Management Act'.
- 14.8 Section 4.4.3 (pg 137) first bullet point – modify to: 'Protect and enhance the intrinsic values of the ecosystems of the river and its ecology'.

Submitter: Submission number:	Hutt Valley Angling Club 14
<p>Relief Sought cont.</p> <ul style="list-style-type: none"> • 14.9 Policy 25 (pg 139) - modify heading: 'Ecosystems and Intrinsic Ecological Processes'. • 14.10 Policy 29 (pg 140) - modify to: 'Improve and extend passive recreational facilities and protect the fishery.' • 14.11 Adding policy to section 4.4 covering: <ul style="list-style-type: none"> - protecting and enhancing the existing fishery. - directing what is an appropriate activity within the river and its bed to maintain a viable fishery. • 14.12 Section 6.2, Anticipated Results: Measuring Performance of Measures: <ul style="list-style-type: none"> - modify existing clause to: 'The Environmental Strategy is Implemented and monitored in a manner acceptable to the community and tangata whenua'. - add: 'Monitoring and reporting environmental impacts'. • 14.13 Add 'Wild Trout Fishery', 'Intrinsic Values', and 'Sustainable Management' to the glossary. These terms are defined in the submission. 	
<p>Flood Protection Group Response:</p> <ul style="list-style-type: none"> • 14.a It is difficult for the Hutt River Floodplain Management Plan to explicitly provide mechanisms to protect and enhance intrinsic values. Instead, relevant references should be made to ecological and ecosystem values to maintain consistency with the Regional Policy Statement. Intrinsic values relate to the wider river ecosystem; they are perhaps best considered in relation to all activities and natural processes affecting river environments. <p>Any issues regarding the intrinsic values of the river ecosystem are more appropriately addressed through the resource consent process for structural works. The consent process is the correct forum for considering such matters in accordance with s.7(d) (other matters of importance), and s.104 (matters to be considered in determining consent applications) of the Resource Management Act 1991 (RMA), including objectives and policies in the Regional Policy Statement and Regional Freshwater Plan.</p> <p>Resource consent compliance requirements for current flood protection operations and other Regional Council activities, recognise the need to maintain certain ecosystem values. For instance, the Flood Protection Group's long-term operational and maintenance consents for the Hutt River has involved Wellington Fish & Game and resulted in a number of requirements for managing the trout fishery including:</p> <ul style="list-style-type: none"> - maintaining pool-riffle-run sequences. - trout spawning timing. <ul style="list-style-type: none"> • 14.1 Section 1.3.1 (pg 18) provides key floodplain management issues considered up until early 1999. Additional issues cannot be added if they were not considered as key matters at the time, regardless of their merit. 	

<p>Submitter: Submission number:</p>	<p>Hutt Valley Angling Club 14</p>
<p>Flood Protection Group Response cont.</p> <ul style="list-style-type: none"> • 14.2 The Plan Objectives (1.3.3) (pg 19) were set during the early stages of the Design Standard phase in 1999 to help determine subsequent processes and general Plan outcomes. The public were consulted at the time, and the draft objectives were subsequently modified and approved by the Advisory Committee. The addition of new objectives at this stage is not appropriate without wider public input, being best addressed during a Plan review. • 14.3 Section 2.5.2 (pg 87) quotes the Environmental Strategy's purpose, while 4.4.3 refer to its guiding principles. They cannot be amended without amending the Environmental Strategy itself. The Environmental Strategy was endorsed by the Regional Council in November 2000. • 14.4 Section 2.5.4 (pg 88) also quotes the Environmental Strategy. It would be premature to make more detailed statements in the draft Plan relating to vehicle access to the river environment. The Environmental Strategy proposes a balanced approach to determining vehicle access issues, and implies that such issues should be considering on a reach by reach basis over the life of the Plan. Furthermore, Rule 35 of the Regional Freshwater Plan treats vehicle entry to and passage across the bed of a river as a permitted activity, and does not assign any performance standards to it. However, s.17 (RMA) requires people to manage environmental effects arising from their activities. • 14.5 Policy 12 (pg 112) (Managing the River Environment) discusses the need to achieve sound environmental standards during works. It is reasonable to add a statement relating to the need to monitor construction practices and other physical works, both in the short and longer term. Monitoring requirements are likely to be tied into resource consent conditions. • 14.6 Policy 16 (Managing the Riverbed), pg 116: talks about improving public understanding and awareness of gravel extraction effects and riverbed monitoring information. Adding a reference to effects of gravel extraction on the river ecology is relevant to the public's wider awareness of effects. However, any monitoring information related to gravel extraction effects may ultimately aid understanding intrinsic values of the Hutt River ecosystem. There is no need to refer to monitoring in this policy should recommended amendments to Policy 12 be accepted. In addition, broad monitoring requirements are discussed in Chapter 7. • 14.7 Voluntary Actions (section 4.3.6), pg 133, are discussed at a more generic level. Therefore, it is reasonable to refer to monitoring environmental effects without needing to list the specific effects to be monitored. • 14.8, 14.9 The heading to policy 25 (pg 139) should not include intrinsic values for the same reasons of Environmental Strategy consistency and appropriateness provided in the discussions on issue 14.3 above. The same reasoning applies to requested changes to section 4.4.3. 	

<p>Submitter: Submission number:</p>	<p>Hutt Valley Angling Club 14</p>
<p>Flood Protection Group Response cont.</p> <ul style="list-style-type: none"> • 14.10 Policy 29 (pg 140) is aimed at promoting passive recreation, and is pitched at a general level. The explanation refers to as variety of activities including angling. Achieving this policy means minimising conflict between recreation activities. • 14.11 Recommended policy additions to Section 4.4 quite specific, whereas the policies for the Environmental Strategy are in fact reasonably broad. It is appropriate that the Policy should remain sufficiently broad to provide backing to the guiding principles and general intent of the Environmental Strategy. Specific matters will be addressed on a reach by reach basis. • 14.12 Section 6.2 (pg 163) provides anticipated results (ARs). These are the end results expected from implementing the Plan and automatically require monitoring so that they can be measured. Chapter 7 discusses requirements for monitoring ARs, so accordingly there is no need to add a monitoring requirement to specific ARs. Section 6.2.7 already covers ARs for environmental impacts of works. An AR covering monitoring impacts does not need to be replicated in section 6.2.1, which deals with broader aspects of adopting and implementing the Plan. • 14.13 Self-explanatory. 	
<p>Recommended Relief to Deal with Issues Raised:</p> <p>Declining:</p> <ul style="list-style-type: none"> • 14.1–14.2 Requested amendments to: key issues in 1.3.1, and Plan Objectives in Section 1.3.3. • 14.3 Requested amendments to Section 2.5.2. • 14.4 Requested amendments to Section 2.5.4. • 14.8, 14.9 Requested amendments to policy 25. • 14.10 Requested amendments to Policy 29. • 14.11 Requested amendments to Section 4.4. • 14.12 Requested amendments to Section 6.2.1 and Section 6.2.6. <p>Accepting in part:</p> <ul style="list-style-type: none"> • 14.5 Modifying Policy 12 with the following bullet point in the text: <ul style="list-style-type: none"> • 'monitoring the effects of physical works to improve practices where possible'. • 14.6 Modifying Policy 16 with the following bullet point in the text: <ul style="list-style-type: none"> • 'understanding how gravel extraction affects river ecology' • 14.7 Amending Voluntary Actions (Section 4.3.6) – Upper Catchment – bullet point 1 to include reference to the effects of vegetation clearance and soil excavation. <p>Accepting in part:</p> <ul style="list-style-type: none"> • 14.13 Requested additions to the glossary, providing these terms are used in the text. 	

HRFMP : Summary Sheet



Submitter: V W Smith

Submission number: 15

Submission Summary

Issues Related to Consultation Draft:

Other Matters:

- 15.a Concerned about 4wd and trail bike use on the river berms between Melling to Kennedy Good Bridge reach, particularly regarding use on grassed areas and in the stormwater outflow channels.
- 15.b Wishes to see the river environment further improved for walkers and cyclists in particular, and looks forward to the hiring of a river ranger.

Relief Sought:

No relief requested.

Flood Protection Group Response:

- 15.a, 15.b
Vehicle and trail bike access policy will be guided by the Environmental Strategy, on a reach by reach basis. This approach also applies to consideration of other recreational uses.

Recommended Relief to Deal with Issues Raised:

HRFMP : Summary Sheet



Submitter: F Allen

Submission number: 16

Submission Summary

Issues Related to Consultation Draft:

Other Matters:

- 16.a The submitter has concerns regarding implementing the Environmental Strategy by an engineering dept traditionally 'conditioned to planting and managing exotics'.
- 16.b Requests:
 - regular monitoring by the Environment Division of Plan implementation and particularly all aspects of construction works.
 - 're-orientation workshops' for Flood Protection staff and associated contractors, relating to planting.

Relief Sought:

Note: Relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 16.a All consented physical works activities will be monitored by the Environment Division in accordance with s.35 of the Resource Management Act 1991 (requirements to monitor and gather information). In addition, the Consultation Draft (chapters 6 and 7) discuss anticipated results and related self-imposed monitoring requirements. No additional monitoring requirements are necessary.
- 16.b Flood protection staff are informed of the advantages and disadvantages of planting exotics and natives in the river environment. The development of an Environmental Strategy for the Hutt River, the Environmental Code of Practice, and policy on native plantings reflect some of this understanding.

Recommended Relief to Deal with Issues Raised:

HRFMP : Summary Sheet



Submitter: Transit New Zealand

Submission number: 17

Submission Summary

Issues Related to Consultation Draft:

- 17.a Submitter requested a briefing on the Plan measures, prior to the Plan being finalised, which WRC agreed to. The submitter is disappointed that the briefing had not occurred.

Other Matters:

Relief Sought:

- 17.1 A briefing regarding any developing detail on Plan measures, and drafting of the Plan.

Flood Protection Group Response:

- 17.a WRC had involved Transit NZ in the Technical Liaison Group, which Transit NZ often did not attend. Following the approval of the Risk-Based 2300 Cumec Standard, Transit NZ requested a briefing, which the Flood Protection Group provided in September 2000. The understanding of the Flood Protection Group was that Transit NZ would request further briefings as required, providing tentative times.

Recommended Relief to Deal with Issues Raised:

- 17.1 The Flood Protection Group will brief Transit NZ staff on 21 May, and provide ongoing updates at their request.

HRFMP : Summary Sheet



Submitter: Hutt Golf Club

Submission number: 18

Submission Summary

Issues Related to Consultation Draft:

- 18.a The submitter states that the short period for submissions did not enable the Hutt Golf Club to 'fully grasp the implications'.

Other Matters:

- 18.b The submitter is looking to ensure that the Plan does not downgrade the facility, and also wishes to see the golf course remain as a separate entity.
- 18.c The Hutt Golf Club will be 'formulating its own plans to provide flood protection'. They envisage no cost for reconstruction work or consultation with WRC.

Other Issues:

- 18.d Issues relating to stormwater management, stopbank access during construction, maintenance, compensation for disruption during construction works.

Relief Sought:

- 18.1 That the logic behind applying varying standards under the Risk-based 2300 Cumec Standard be discussed in the Plan, particularly as it applies to 2800 cumec protection.
- 18.2 Maintaining discussions with WRC on specific design options affecting the Hutt Golf Club, and seeks clarification in the near future on specific issues raised in the Consultation Draft.
- 18.3 Assurances from the Regional Council and Hutt City Council that maintaining the present quality of the Golf Course will be enabled by the Plan measures.
- 18.4 Providing clear information in the draft Plan regarding stopbank alignment options affecting the Golf Club.

Flood Protection Group Response:

- 18.a The consultation and submissions period was constrained by the wider programme for drafting the Plan. However, the Flood Protection Group did extend the submission deadline and offered a briefing session to assist the submitter.
- 18.b The Regional Council acknowledges that the Golf Club wishes to maintain the present quality of the course, and will consider this matter with utmost care as design options are developed and discussed.
- 18.c, 18.d Concerns regarding potential disruption during works, future maintenance and other related matters need to be the subject of ongoing discussion between WRC and the Hutt Golf Club. Stopbank alignment between Rentokil property and Kennedy-Good Bridge is to be determined through the design and consent processes in consultation with Hutt and Boulcott Golf Clubs and affected residents. Given the uncertainties regarding alignment options, it is best to omit possible alignments from Section 2.3.
- 18.1–18.4 are self explanatory.

Recommended Relief to Deal with Issues Raised:

Accepting:

- 18.1 Clarifying further in Section 4.2.2 (pg 105), the application of varying standards to the Risk-based 2300 Cumec Standard.
- 18.2, 18.3 Continuing ongoing and regular discussions with the Hutt Golf Club on request, and as new design and alignment information is considered.
- 18.4 Providing in Chapter 2, information on stopbank alignment options affecting Hutt Golf Course. Remove the alignment shown in the Consultation Draft, and add a note reflecting Flood Protection Group's response discussion (8.3), under stopbank: Left Bank (pg 40).

HRFMP : Summary Sheet



Submitter: Keep Petone Beautiful

Submission number: 19

Submission Summary

Issues Related to Consultation Draft:

- 19.a Submitter congratulates WRC on the quality of the Consultation Draft, and the consultation process.
- 19.b Supports works required to achieve the flood hydraulic line on the true right bank downstream of Estuary Bridge.
- 19.c Opposes using 4WD vehicles in the river environment, believing that vehicle access should be limited to parking areas.
- 19.d Supports wheelchair walking and cycle access.

Other Matters:

- 19.e Wishes to support dredging where it is necessary, but requests environmental matters be considered ahead of economic benefits. The submitter believes that certain dredging at the Hutt River mouth has adverse environmental effects, including stability of Estuary Bridge.

Relief Sought:

Note: Relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 19.a Self explanatory.
- 19.b Achieving the hydraulic line in the Estuary reach will occur, but not immediately because:
 - the priority order for structural works assigns a low priority to the hydraulic line.
 - WRC needs to form a strategy with Winstone Aggregates for ongoing operation at the site. Discussion on the hydraulic line is also provided under Submission 9: Winstone Aggregates Ltd.
- 19.c and 19.d are self-explanatory.

Submitter:	Keep Petone Beautiful
Submission number:	19
Flood Protection Group Response cont.	
<ul style="list-style-type: none">• 19.e The hearings for the Hutt River Mouth gravel extraction application were completed in 1999. Riverbed monitoring results presented at the time revealed minor bed degrade downstream of the bridge. The degrade has been explained as localised bed scouring from floodwaters moving through a choke-point in the system. At the same time Hutt City Council completed an assessment of the bridge structure finding that the piers were only marginally founded. Since then Hutt City Council have carried out remedial works on the bridge piers, and WRC has ceased any extraction within 400m downstream of the bridge.	
Recommended Relief to Deal with Issues Raised:	

HRFMP : Summary Sheet



Submitter: Hutt City Council

Submission number: 20

Submission Summary

Issues Related to Consultation Draft:

- 20.a Notes that this submission is provisional until it has been ratified by Hutt City Council on 22 May 2001.
- 20.b Hutt City Council 'commends' WRC on the Consultation Draft, stating that it 'represents a practical approach to addressing the flood risk'.

Other Matters:

- 20.c Supports the proposed establishment of a joint management committee to oversee implementation of the Environmental Strategy, stressing the importance of having 'the ability to provide input to projects at an early stage'.
- 20.d Supports current WRC funding policy, and requests that any future review of the policy should not consider flood protection in isolation.

Relief Sought:

- 20.1 Costs and wider benefits (such as generating community interest) need to be considered in any priority order for the timing and implementation of proposed Environmental Strategy projects.
- 20.2 Policy 8 (removing services from stopbanks) (pg 110) needs to allow for 'a small number' of wastewater discharge outlets that normally operate during high flows or emergencies.
- 20.3 The Objectives and structural measures should address protecting essential trunk wastewater pipelines against scour and erosion.
- 20.4 Deleting last sentence on pg 66 (Section 2.4.3), relating to activities attaining permitted activity status, because of potential constraints on the District Plan variation process.
- 20.5 Support matters relating to non-structural measures, but reiterate that land-use controls proposed in Table 3 (Chapter 2), 'must at this stage be broad general guidelines' and may require amending after more detailed analysis. The district plan variation / change process should not be constrained by the land use controls specified.

Submitter: Submission number:	Hutt City Council 20
<p>Flood Protection Group Response:</p> <ul style="list-style-type: none"> • 20.a and 20.b are self-explanatory. • 20.c Indications from each Council are, at this stage, that they would like to see continuity of the Advisory Committee in its current format. This matter will be reported to the 12 July Advisory Committee meeting. • 20.d Self explanatory. • 20.1 It is reasonable to expect that the wider costs and other benefits are considered in prioritising proposed enhancement projects, however, they must also be accommodated within budget and programme constraints. • 20.2 Policy 8 (pg 110) promotes the rationalising of service crossing points, which is critical to improve the integrity of the stopbanks. However, ultimately practical considerations need to be factored into any rationalising including the selection of crossing points for specified wastewater discharge outlets. • 20.3 The Plan Objectives (Section 1.3.3) were finalised in 1999 through a public process, and should not be altered at this stage. Policy 9 (pg 111) already make provision for special agreements and that is the most appropriate way to manage this issue. Some historic arrangements have been made in this regard relating to the main trunk sewer. • 20.4 Self-explanatory. • 20.5 Section 2.4: It is entirely appropriate that the discussion of non-structural measures in the Plan does not pre-judge the outcome of any district plan variation / change process. Non-structural measures included as principles and outcomes for the draft Plan require flexibility to be developed in a way that enables matters such as legal validity, practicalities of implementation, annual planning priorities, and fairness and balance, to be appropriately considered. Importantly, the process of developing and refining non-structural measures to achieve the intent of the principles, will rely on the continuing good faith between the Regional and City Councils. 	
<p>Recommended Relief to Deal with Issues Raised:</p> <p>Accepting:</p> <ul style="list-style-type: none"> • 20.1 Considering costs and wider benefits. • 20.2 Amendments to Policy 8. • 20.4 Deleting final sentence – pg 66 (Section 2.4), referring to permitted activity performance standards, and replacing it with the following: 'Table 3 only covers activities that reflects the Non-structural principles in Chapter XX'. • 20.5 Modify text in accordance with the discussion above regarding developing non-structural measures. <p>Declining:</p> <ul style="list-style-type: none"> • 20.3 Modifying Plan Objectives. 	

HRFMP : Summary Sheet



Submitter: G Caesperlein

Submission number: 21

Submission Summary

Issues Related to Consultation Draft:

- 21.a The submitter is employed as a flood protection engineer for a local authority in the Nordrhein-Westfalen region of Germany.
- 21.b The Consultation Draft is clear and understandable with good information – 'a good example for a democratic way of planning'.
- 21.c The consideration of Maori values is 'a noteworthy part of the FMP'.
- 21.d Issues of sustainability, the weighting in the priority schedule, stormwater management and structural options are discussed. It appears that no additional structural approaches would be available.
- 21.e Applauds the Environmental Strategy, although links between the Linear Park and the urban environment appear minimal.
- 21.f New development should avoid introducing additional run-off to the river, and efforts should go into encouraging good practice in upper catchment areas that improves water retention.
- 21.g The submitter compares protection standards between NZ and Europe noting that important infrastructure often receives protection greater than the 100 year standard.

Other Matters:

Relief Sought:

No relief requested.

Flood Protection Group Response:

- The Flood Protection Group wishes to acknowledge the constructive comments provided by the submitter.

Recommended Relief to Deal with Issues Raised:

HRFMP : Summary Sheet



Submitter:	Hutt Valley Tramping Club
Submission number:	22

Submission Summary

Issues Related to Consultation Draft:

Other Matters:

- 22.a Requests that stopbanks and other structures are designed so they can be traversed by cyclists and walkers
- 22.b Walking and cycleways should be provided on both sides of the river and bridges.
- 22.c Early planting of native species on river berms.

Relief Sought:

Note: Relief sought does not relate to the Consultation Draft.

Flood Protection Group Response:

- 22.a Stopbank crests will be 4m wide enabling easy passage for walkers and cyclists. Access will be maintained to any stopbank located on public land, and paved surfaces on existing stopbanks will be reinstated where they are affected by stopbank works.
- 22.b The Environmental Strategy provides the framework for passive recreation including accommodating any additional trails.
- 22.c Incorporating native species forms a significant part of the Environmental Strategy's recommended enhancement projects. The majority of enhancement projects will track the progress of structural works along the River, therefore plantings would probably be undertaken on a regular basis throughout the 40 year life of the Plan.

Recommended Relief to Deal with Issues Raised:

HRFMP : Summary Sheet



Submitter: Clear Communications

Submission number: 23

Submission Summary

Issues Related to Consultation Draft:

- 23.a Registers thanks for being involved in the process and looks forward to the next stage of the process.

Other Matters:

Relief Sought:

No relief requested.

Flood Protection Group Response:

Recommended Relief to Deal with Issues Raised:

HRFMP : Summary Sheet



Submitter:	Upper Hutt City Council
Submission number:	24

Submission Summary

Issues Related to Consultation Draft:

- 24.a Pleased with the 'planned approach to the management of the river' which has considered a full range of measures and an environmental strategy.

Other Matters:

Relief Sought:

- 24.1 Delete inferences to non-structural measures requiring additional spending and the finality of rules in district plans, on pgs 4 and 5 of the Executive Summary.
- 24.2: In section 1.1.4 (pg 9) comparisons between existing and upgraded system flood extents are confusing for the Upper Hutt situation. They imply that the differences in potential flood hazard are significant when the proposed upgrading to the flood defences is minor.
- 24.3 Clarify Upper Hutt City Council's responsibilities for managing small streams in urban versus rural areas, discussed in section 1.4 (pg 21).
- 24.4 Modify figure 4 (pg 22) to reflect flexibility required for developing non-structural measures to be included in District Plans.
- 24.5 Modify Section 2.2.1 (pg 27) bullet point 4 to include the words 'and associated floodway'.
- 24.6 Modify all statements referring to bridges being funded solely by bridge owners.
- 24.7 Including Ava Rail and Moonhine Bridge investigations in Section 2.2.2 (pg 28), which are signalled by the WRC's Long-term Financial Strategy.
- 24.8 Including the full original structural measures priority list in Section 2.3.
- 24.9 Editorial changes covering the structural measures reach diagrams in Section 2.3.
- 24.10 On pg 54, including information regarding the possible changes to Awa Kairangi Park due to structural works.

Submitter: Submission number:	Upper Hutt City Council 24
<p>Relief Sought cont.</p> <ul style="list-style-type: none"> • 24.11 Amending pg 57 so that work programmed to occur before 2010 is correctly identified; and pg 58 to include bank edge protection to the 1900 cumec standard at Bridge Road. • 24.12 Delete last sentence, pg 66 (Section 2.4): 'Finally any activity not covered by these tables would automatically be permitted without having to meet permitted activity performance standards.' • 24.13 The submitter wishes to ensure that land-use controls proposed in Table 3 (pgs 72-81) do not constrain the district plan variation process. These controls at this stage must be considered as 'broad guidelines' that may be amended 'after more detailed discussion at a local level'. • 24.14 Modify Table 3 relating to Bridges passing the 2800 cumec flood. • 24.15 In Section 2.4.5 (pg 85), delete references to completion dates for recommended emergency management projects. • 24.16 Reword Section 2.4.6 (pg 86) to ensure that possible district plan changes are not signalled for immediate action. • 24.17 Policy 8, Section 4.2.3, pg 110 (Removing services from stopbanks): Recognising emergency overflow wastewater discharge outlets, and water and sewer mains which must pass under stopbanks. • 24.18 Policy 14, Section 4.3.3, (Clarifying floodplain management roles), pg 114 – should recognise that the primary floodplain management planning function is with the Regional Council. • 24.19 Policy 19, Section 4.3.4 (Providing flexibility for agreed non-structural principles), pg 120 – the first paragraph implies that the proposed non-structural measures are final measures, which should not be the case. • 24.20 Policy 24, Section 4.3.4 (Using flexible mitigation methods), pg 123, should not refer to 'pressure on resources' as a reason to constrain development. • 24.21 Section 4.3.6 (pg 124): Measures for the Upper Catchment (rate of earthworks) – delete references to a WRC submission on the District Plan, since UHCC are still considering submissions on the Proposed District Plan. • 24.22 Correcting anomalies on pgs 130 and 131 referring to Critical Facilities relating to key network utility facilities in the River Corridor, and healthcare and emergency management facilities in Higher Risk Floodplain Areas. • 24.23 A mechanism needs to be in place to ensure future owners of rail transport infrastructure are aware of the need to upgrade Ava Rail bridge. 	

Submitter: Submission number:	Upper Hutt City Council 24
<p>Flood Protection Group Response:</p> <ul style="list-style-type: none"> • 24.a Self-explanatory. • 24.1 Self-explanatory. • 24.2 The first set of flood extent maps in Chapter 1 (pgs 11 and 12) should be re-titled and annotated to show the envelope of flooding if there were breaches in the upgraded system. The second set of maps (pgs 13 and 14) show the situation with no breaches reflecting the ultimate desirable performance of the upgraded system. It should be noted that the current maps do not reflect the relative-risk, at any particular location, they are generic maps. The maps also do not necessarily reflect the existing standard of current protection along the river, or the amount of upgrading work required. • 24.3–24.5 are self-explanatory. • 24.6 WRC has made provision to carry out investigations and meet its responsibilities for flood protection at Ava and Moonshine. References to financial contributions for all bridge works should in fact be removed from the Plan. Relevant statements in Section 2.3 need to refer to bridge investigations and provisions to meet the design standard. • 24.7 Self-explanatory. • 24.8 The original structural measures priority list was replaced at the March 2001 Advisory Committee meeting by the revised schedule. However, the first 10 years of the original list are included in the Long-term Financial Strategy. Also the works contained in the original list are included under their respective reaches. Only the current schedule should be included in Section 2.3, and all other references in Section 2.3 to the original priority order, in addition to those listed above, should be deleted. • 24.9–24.11 are self-explanatory. • 24.12 The final sentence on pg 66 had been intended to provide some certainty to readers that the guidelines dealt with a limited range of activities and affected areas. • 24.13 Section 2.4: It is entirely appropriate that the discussion of non-structural measures in the Plan does not pre-judge the outcome of any district plan variation / change process. Also City Council expenditure on any non-structural measures should not be pre-determined. Non-structural measures included as principles and outcomes for the Draft Plan require flexibility to be developed in a way that enables matters such as legal validity, practicalities of implementation, annual planning priorities, and fairness and balance, to be appropriately considered. Importantly, the process of developing and refining non-structural measures to achieve the intent of the principles will rely on the continuing good faith between the Regional and City Councils. • 24.14 Self-explanatory. 	

<p>Submitter: Submission number:</p>	<p>Upper Hutt City Council 24</p>
<p>Flood Protection Group Response cont.</p> <ul style="list-style-type: none"> • 24.15 Footnote 14, Section 2.4.5 (pg 85), states possible completion dates for projects. It is not appropriate to provide pre-set dates which have not been programmed by the participating councils Long-term Financial Strategy or annual plans. However, a discussion of possible timeframes is reasonable providing the Councils financial planning processes are also flagged. While this discussion is provided in Chapter 5, it should also be covered to some extent in Section 2.4.5. • 24.16 Section 2.4.6 (pg 86) should refer to commencing development of actual measures, rather than giving impressions that changes to district plans will occur immediately. Furthermore, the formation of all measures from the Non-structural measures principles will take place throughout the life of the Plan: for instance certain voluntary actions could be developed relatively quickly. • 24.17 Policy 8 (pg 110) promotes the rationalising of service crossing points. This is critical to improving the integrity of the new stopbanks, however practical considerations ultimately need to be factored into any rationalising including the selection of crossing points. • 24.18 Policy 14, Section 4.3.3 (pg 114), discusses shared responsibilities, while recognising the Regional Council's primary role to facilitate floodplain management planning. The issue and explanation parts to this policy discuss the Regional Council's role, but perhaps could be strengthened. If so, then modifying the policy as well is not necessary. • 24.19 Policy 19, Section 4.3.4 (pg 120), discusses the need for flexibility in developing non-structural measures. The policy must not imply that measures have been actually finalised. While the principles will be eventually finalised within the adopted Plan, the development of actual measures and their ultimate acceptance by the City Councils requires ongoing flexibility. • 24.20 Self-explanatory. • 24.21 Section 4.3.6 (pg 124), Measures for the Upper Catchment: it is not appropriate for any statements to refer to submissions on Proposed District Plans that are yet to be determined. • 24.23 The eventual replacement of Ava Rail bridge is critical to the security of the neighbouring floodplain and agree a mechanism needs to be in place to ensure future owners of rail transport infrastructure are aware of the need to upgrade this bridge. 	
<p>Recommended Relief to Deal with Issues Raised:</p> <p>Accepting:</p> <ul style="list-style-type: none"> • 24.1 Executive Summary – modifying non-structural options references on pg 4 and 5. • 24.2 Section 1.1.4 – Annotate and re-title the flood maps as discussed, and clarify the relative differences between the two flood scenarios in terms of breaching and overtopping. 	

Submitter: Submission number:	Upper Hutt City Council 24
<p>Recommended Relief to Deal with Issues Raised cont.</p> <ul style="list-style-type: none"> • 24.3 Section 1.4 – clarifying UHCC responsibilities for managing small streams. • 24.4 Figure 4 (Section 1.4) – modifications to non-structural references. • 24.5 Section 2.2.1 – adding floodway references. • 24.7 Section 2.2.2 – including references to Ava and Moonshine bridge investigations • 24.9–24.11 Section 2.3 – general intent of all requested editorial changes to structural measures reach diagrams, and associated information. • 24.12 Deleting final sentence – pg 66 (Section 2.4), referring to permitted activity performance standards, and replacing it with the following: • 'Table 3 only covers activities that reflect the Non-structural principles in Chapter XX'. • 24.13 Modify text in accordance with the discussion above regarding developing non-structural measures. • 24.14 Modify Table 3 (Section 2.4, pgs 73-81) references to bridge replacement passing 2800 cumec flood events, to also include 'associated floodways'. • 24.16 Modify Section 2.4.6 so that the immediate implementation of measures is not implied. • 24.17 Modify Policy 8 and relevant Utilities and Services Policy to include provision for specified wastewater discharge outlets and other mains where no viable alternatives exist. • 24.18 Modify the Issue and Explanation sections to Policy 14 (Section 4.3.3) to emphasise the Regional Council's primary role to facilitate floodplain management. • 24.19 Delete references to the finality of measures in the Issue section to Policy 19 (Section 4.3.4). • 24.20 Delete bullet point 6 in Policy 24 (Section 4.3.4). • 24.21 Delete references to a WRC submission on the UHCC Proposed District Plan, on pg 124. • 24.22 Requested amendments. • 24.23 Statements regarding a mechanism for any future owners to be advised of bridge upgrade needs. <p>Accepting in part:</p> <ul style="list-style-type: none"> • 24.6 Clarify any statements referring to funding bridge replacement as discussed above. • 24.15 Delete footnote 14 (Section 2.4.5) and replace it with text referring to possible timeframes, that are also subject to Council long-term financial and annual planning requirements. To provide leeway for these processes, the <u>suggested</u> timeframes should be set back by one year. <p>Declining:</p> <ul style="list-style-type: none"> • 24.8 Section 2.3 – including the original structural measures priority list. 	

HRFMP : Summary Sheet



Submitter: Environment Division, WRC

Submission number: 25

Submission Summary

Issues Related to Consultation Draft:

- 25.a These are detailed comments covering general matters, editing changes and queries relating to specific issues in the Consultation Draft. No substantial material changes are recommended.
 - The first part is a general comment on the Consultation Draft itself which is supportive of its approach, its content, level of detail, and the integration of environmental management and flood protection issues.
 - The second part presents impressions of the various parts of the Consultation Draft, highlighting possible amendments.
 - The third part discusses chapter 3, Nga Tikanga Maori, questioning aspects of its future implementation.
 - The fourth part provides specific suggested amendments.

Other Matters:

Relief Sought:

- Relief sought relates to editing and structural changes.

Flood Protection Group Response:

- 25.a Recommend working with Environment Division staff to incorporate suggested modifications to the Consultation Draft where appropriate, relevant and feasible.
- It should be noted here, that Chapter 3 is the tangata whenua's chapter representing their aspirations. Tangata whenua are the first port of call in dealing with the issues raised, and they will guide the Regional Council in determining the final content and expression within this chapter.

Recommended Relief to Deal with Issues Raised: