

23 September 2022

To Wellington City Council: consent.submissions@wcc.govt.nz

Serve copy of submission to the Requiring Authority: Paul McGimpsey Paul.McGimpsey@beca.com

Name of applicant/Requiring Authority: Wellington City Council

Site address: 127 and 141 Stewart Duff Drive, Rongotai (Moa Point)

Proposal: The construction, operation and maintenance of a new Sludge Minimisation Facility (SMF)

Service Request Number: 519248

Submitter Details:

Organisation Name: Guardians of the Bays Incorporated

Contact person: Yvonne Weeber- Chair of Guardians of the Bays

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- We are neutral on the application.
- We are not a trade competitor
- We would like to be heard in support of our submission.
- We would like to be involved in mediation on our submission especially the conditions of the consent.
- If others make a similar submission we will consider presenting a joint case with them at the hearing.

Submission Introduction

Guardians of the Bays (GOTB) is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on an isthmus surrounded by either sea or predominately residential neighbourhoods. GotB objectives are to reduce the adverse effects that arise from Wellington airport including proposed runway extensions, expansions, increased aircraft and land transport movements and other related activities on the environment. The adverse effects may include but are not limited to coastal reclamation, emissions, noise, stormwater, reduction of visual and landscape amenity and neighbourhood disruption.

Guardians of the Bays recently settled with Wellington International Airport Limited on their Main Site Area and East Side Area designations for Wellington Airport. We have made a submission on the Wellington City Proposed District Plan.

The Guardians of the Bays were involved in consultation on the SMF early in 2022 and attended the consultation at Ruakawa Community Centre on Sunday 18 September 2022.

While this is not a Wellington Airport Proposal it involves the purchase of Wellington Airport land to increase the size of the designation and an area for construction works within Wellington Airport e.g.

the Hillock. The SMF proposal is also directly next to the airports South Coast Precinct Development Area. As viewed from the surrounding environment the SMF will look like a continuation of Wellington Airport activities and it is part of the overall cumulative effects of the airport and sewage treatment processing facilities in this area.

Our members and supporters will have mixed views on the SMF proposal. While some will support the reduction of carbon emissions others will be appalled at the immense industrial scale of the SMF proposal in the coastal environment.

Guardians of the Bays is therefore making a neutral submission. Using the lessons learnt from the recent WIAL mediation on the Main Site Area and East Side Area we are focusing on the conditions of consent to make them appropriate for the scale of the building, in keeping with Wellington Airports designation conditions of their designations and enforceable.

The submission is therefore made on the following matters:

- Building design and landscape of the SMF
- Construction noise
- Access to Stewart Duff Drive (the WIAL private road) that acts as a through road between the coast and the Mirmar community.
- Transport planning of construction and ongoing management of the SMF
- A community liaison group for the construction of the SMF

Submission Statements

We are neutral on the application.

We believe a number of aspects of the application need to be improved with changes to the conditions of consent.

The reason for this submission are:

Building design and landscape of the SMF

The proposed SMF will be viewed by the same residents as Wellington Airport. This includes people living in Strathmore Park, Rongotai, Lyall Bay and Melrose plus people traveling around Wellington Airport and on Stewart Duff Drive. This proposal will change further the environment that adjoins the WIAL's proposed changes of the Hillock removal and East Side Area development and future airport buildings are constructed.

This is a coastal environment which has had many man made modifications but this proposal continues the dramatic modification of this coastal environment. The Wellington City Proposed District Plan has the Hue tē Taka Peninsula/Rangitatau Palmer Head- Outstanding Natural Feature as an outstanding natural feature and landscape. The WC153 Strathmore coastal shrubland, WC154 Moa Point Coast Platform and shrubland, WC175 Moa Point gravel dunes, and WC176 Lyall Bay dune as a significant natural areas. The relationship of these outstanding natural and significant natural features should be considered in greater detail in this design of this project.

It is rather disingenuous to say in the landscape assessment that viewing distances outside a 'receiving environment' have a 'negligible' effect. When you have a flat landscape of an airport as the foreground the views on to the hills and the proposed SMF buildings and structures are dramatic due to the industrial scale which includes the height, length and different industrial building and structure forms and the removal of existing land forms (hillock and ridge behind the SMF). These buildings, structures and removal of landforms mean this development will dominate the landscape of this part of the airport and coastal environment. This is not a small proposal due to the bulk -height, width and random nature of the building and structure placement combined with the removal of ridges and hillocks.

There is a cumulative effect of the SMF proposal and the existing Moa Point Sewage Treatment Plant, future Wellington Airport buildings and ongoing removal of geographic features such as the hillock and ridge behind the proposed SMF.

The disparity of the heights of the buildings and structures between the Landscape and Visual Assessment and the Conditions by up to 10 metres in height bring into question the visual representation of all the photomontages and the overall landscape and visual assessment of the proposal.

The buildings are considerably taller than the three storeys. In Appendix g Landscape and Visual Assessment they talk of 22m and 21m buildings and Odour Stack of 29m. However, in Appendix d Proposed Conditions of Lodgement the maximum height of the buildings could be up to 32m and 35.5m tall and the Digestors of 30m. If we take a generous 4.4m of one storey height the SMF buildings could be anything from 5 storeys to 8 storeys in height. This is considerably taller than 3 storeys. The conditions of consent do not list the height of the Odour Stack.

The 'Visualisations of Proposal' attachment 15, 16, 17, 18, 19, 20, 21 and 22 in Appendix G Landscape and Visual Assessment, do not provide a true representation of the height of the SMF proposal as described in Appendix D Conditions- 20.1 Layout and Height. This brings into doubt the both the visual and landscape assessment.

The visual effects generated by the SMF proposal, both buildings and structures, are clearly not acceptable for the receiving environment as there is the need to 'reduce' the impact of the buildings and structures with 'recessive colours'. The design of the buildings and structures needs greater design thinking and implementation rather than a 'painting it grey, green and brown and leaving it there'. At the very least the building form, textures and full pallet of colours should be considered in the conditions and provided in the visual representation of the proposal.

It should be noted that the Airport (carparking building) and Lyall Bay (Lyall Bay Surf Club) are two buildings that use a tiled facade approach with combinations of coloured tiles to reducing the bulk and form of the buildings. These buildings don't just use recessive colours but a palette of colours to break down the bulk and provide interest as part of the design. While we are not proposing this as the only option we are pointing out the proposals of this bulk should look beyond using just the use of recessive colours. The use of only recessive colours is considered by the Guardians of the Bays as bad

design. When the viewing audience see the buildings against the sky or with a background of seasonal changing landscape e.g. yellow parched hills of summer the use of recessive in grey, green and brown colour hues will actually increase the bulk of the buildings and structures.

In respect to the concrete used on the retaining walls it is often better to let concrete age with the landscape rather than colour it in a way that will make it more visually prominent in the landscape.

Ecology

The Guardians of the Bays support measures to undertake a Lizard Management Plan as the existing lizard populations which have increased due to the predator free activities of Predator Free Miramar and Wellington. There needs to be further work in the conditions to support the Predator Free aspects of the development through out construction and management.

Construction noise

The Guardians of the Bays are concerned that significant noise could be generated by the construction of this SMF. In particular we are concerned about noise from construction during the night airport curfew hours e.g. crane lifts of oversized equipment. We agree that residents need to be advised about the any activities within the curfew hours or that exceed night-time recommended noise limits. Consideration of compensation or alternative accommodation during these nights should be considered in the conditions.

Access to Stewart Duff Drive (the WIAL private road) that acts as a through road between the coast and the Mirmar community.

Guardians of the Bays is concerned about the restrictions on access along Stewart Duff Drive. While we know this is a private road it should be considered as an essential access route for vehicles, cyclists and pedestrians. This access is also important for Moa Point residents to access higher ground in case of a Tsunami.

Transport planning of construction and ongoing management of the SMF

The Guardians of the Bays see that there is a conflict between construction times, especially in the evening and on Saturdays and the normal recreational practices of the Lyall Bay. Peak use at Lyall Bay ebbs and flows but is often between 3 and 6pm when construction traffic could be intensive from the site. This is particularly an issue as its all your heavy construction traffic that will be entering Lyall Parade via Moa Point Road where there is a convergence of surfers, dog walkers, general recreation users, shoppers, café users, general traffic movements, cyclists and pedestrians.

Route 1 Lyall Parade, Onepu Road and Evans Bay may be arterial vehicle route but at present the road surface of Lyall Parade is breaking up and requires a total reconstruction to get it to a manageable surface for the present road users. With additional heavy vehicles this road surface will deteriorate further. In addition mitigation measures will be required with increased traffic such as concrete pours due to conflicts between trucks and all the other users of Lyall Parade, Onepu Road and Evans Bay.

We propose a lower speed limit be considered during construction especially along the main access routes in Lyall Bay, Rongotai and Kilbirnie. This lower speed limit should be consideration due to the

recreational users in Lyall Bay, and Evans Bay Parade (Kilbirnie Green), the commercial centres of Rongotai and Kilbirnie, the residential areas of Lyall Bay, Kilbirnie and Rongotai and schools in the area.

Community liaison group

The Guardians of the Bays sees the need for a community liaison group during the construction of the SMF and long term management of the plan. We understand the relationship to the Moa Point Wastewater Treatment Plant community liaison group but know that during construction a different group of community people is required that needs to include the residents of Moa Point, Strathmore Park and areas where the construction traffic will travel in Lyall Bay, Kilbirnie and Rongotai.

The community liaison group could be created from contacting specific groups such as schools, Lyall Bay Coast Care, local surf clubs, dog walkers, schools and board riders groups as well as the Strathmore Residents Association.

Yvonne Weeber (Chair of Guardians of the Bays) is part of the Community Liaison Group due to her long involvement with the Moa Point treatment Plant. It is her view it is time for it to have a refresh and expansion of membership of this Community Liaison Group with those that are concerned about the construction and the long term management of the Moa Point Sewage and Sludge Treatment site and output.

The decision we would like Wellington City to make is:

The Guardians of the Bays would like a revised set of 'Visualisations of Proposal' attachment 15, 16, 17, 18, 19, 20, 21 and 22 in Appendix G Landscape and Visual Assessment, to provide a true representation of the height of the SMF proposal as described in Appendix D Conditions- 20.1 Layout and Height.

The Guardians of the Bays believe the following changes should be made to the conditions

- [] - Information that needs to be supplied in the conditions
- ~~Strikethrough~~-- deletion of wording
- Underline – additional wording

20.1 Layout and Height

[Provide a full list of heights of all buildings and structures including the Odour Stack].

21 Design and Appearance

21.1 The Requiring Authority shall prepare a Design Statement to demonstrate how the development is consistent with the following requirements for the purpose of mitigating landscape and visual effects:

- Integration with the adjoining Moa Point Sewage Treatment Plant and adjoining Airport precinct.
- The building form, mass, colour and texture are used to reduce the apparent height and bulk of the SMF buildings and other structures (odour stack, odour control area, digestors and any

other structures) that minimise reflectivity and glare when viewed from adjoining public and residential areas.

- All colours applied to publicly visible parts of the SMF shall have a light reflectance value (LRV) no greater than 42%.
- All colours applied to publicly visible parts of the SMF shall be selected from ~~the grey, green and brown hues of the colour palette~~ that best relates to the natural environment, of either the hillside and its vegetation or the sky and seascape that surrounds it. It should be noted that grey, green and brown hues may actually make the buildings stand out more when there the buildings only have sky behind them as viewed from Strathmore Park.
- Details of the concrete compound, surface finish or mixture to be used externally on the buildings demonstrating that it achieves an equivalent light reflective value (LRV) of 42% maximum.
- The SMF buildings shall not be clad in materials including stainless steel or unpainted galvanised steel, copper or polycarbonate translucent cladding.
- Any glazed areas shall use low-reflectivity glass.
- Any external lighting shall be shielded to prevent light spill. Any external lighting shall be for wayfinding and security reasons only.
- The SMF buildings shall not include any sign-writing or advertising. Any signage shall be low level, for way-finding purposes only, for the benefit of site users.
- Details of fences, gates and walls.
- Details of any engineered retaining features shall comprise of a mixture of natural and constructed elements, comprising enduring low maintenance materials that allow for such features to integrate with the surrounding environment and to be reduced in height as is practicably achievable without compromising structural stability or other safety or operational requirements
- Details of ~~any~~ the wire mattress system for stabilisation of cut slopes and the exact locations for any proposed shotcrete.
- Details of the façade treatment of any engineered retaining features over 1.5m in height to reduce the visual prominence of such structures and to add visual interest and be part of a total design of the buildings, structures and engineered retaining features.
- Details of any planting on the retaining features which shall be endemic species as far as practicable.
- To achieve an equivalent LRV of 42%, the concrete will need to be textured, coated or include an oxide in the mix, or both. Any texture applied to the concrete will also assist in reducing the material's reflectivity. The concrete's reflectivity will need to be approximately midway between Gull Grey (50% LRV) and Sandstone Grey (27% LRV).

In preparing the Design Statement, the Requiring Authority shall consult with the Council and a final draft shall be submitted to the Council for comment. In finalising the Design Statement the Requiring Authority shall take into account any feedback received from the Council.

~~Note – To achieve an equivalent LRV of 42%, the concrete will need to be textured, coated or include an oxide in the mix, or both. Any texture applied to the concrete will also assist in reducing the material's reflectivity. The concrete's reflectivity will need to be approximately midway between Gull Grey (50% LRV) and Sandstone Grey (27% LRV).~~

- 25.1 fa) a requirement to consult with Wellington City Council and seek agreement to impose a reduced speed limit along both Route 1 and Route 2 to access the site. In particular on Lyall Parade, Onepu Road, Rongotai Road, Evans Bay Road, Tirangi Road, Salek Street and Troy Street.
- g) Provide regular information on the traffic movements to the community the surrounds Route 1 and 2 so that they are aware of the type of construction traffic that is going to occur.
- 25.2 The Requiring Authority shall submit a Construction Noise and Vibration Management Plan (CNVMP) which shall be prepared by an appropriately qualified acoustic and vibration specialist. The purpose of the CNVMP is to provide a framework for the development and implementation of measures to avoid, remedy or mitigate adverse construction noise and vibration effects, and to minimise any exceedance of the criteria set out in Conditions 25.3 and 25.4.
- As required by Condition 23.1, the CNVMP shall also identify any construction work which cannot be reasonably undertaken during normal working hours and incorporate a plan of communication to affected local residents and ways to provide compensation or alternative accommodation.
- 28.1 The Requiring Authority shall ~~work with the~~ update the Community Liaison Committee with new members from Lyall Bay, Rongotai Kilbirnie and Strathmore Park community (as originally established in association with the Moa Point WWTP) and shall:
- [final bullet point of 28.1] Be responsible for a providing regular information to the local community through meetings and social media e.g.posting items in local Facebook community groups
- 28.3 e) This record shall be maintained on site and shall be made available upon, and it shall be available on the Sludge Treatment Plants website.
- f) Provide regular reports to the council on any complaints and steps to remedy or mitigate the complaint.

Ngā mihi nui



Yvonne Weeber
Chair of Guardians of the Bays