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Glenside Progressive Association (GPA)
Submission to the Wellington City Council
Proposed District Plan for Wellington City – Focus on Glenside
12 September 2022

1 Summary

The GPA supports most of the proposals made in the Proposed District Plan (PDP) for Upper Stebbings Valley but want to see major changes to the proposals for Glenside West.

These are the changes the GPA would like to see incorporated in the final plan.

- The road connection with Tawa should be reinstated.
- That part of Glenside West which is currently protected as a ridgeline (Marshall Ridge) should be retained as open space under the continued protection of District Plan Change 33 (DPC33).
- Earthworks should be kept to a minimum.
- DPC33 covering Ridgelines and Hilltops, and rural areas should be respected.
- The Subdivision Design Guide covering earthworks should be greatly strengthened.
- The Residential Design Guide, section on Built Form, should be strengthened to include form, colour and light pollution for housing that is visually prominent.

2 Glenside West



Area of 395 Middleton Road showing land proposed for development as part of Glenside West, taken 2021

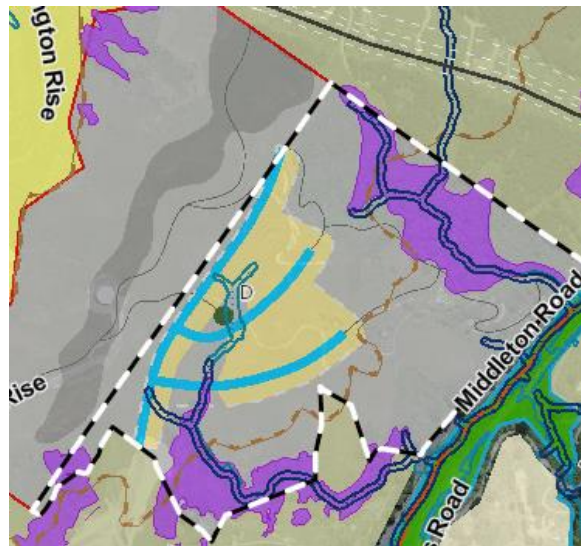


Fig 1 Map of Glenside West from the Draft District Plan

Glenside West is a high altitude section of rolling farmland. The area marked Built Areas (light yellow in the APP13 map) lies within the *Ridgeline and Hilltops Overlay Visual Amenity, 2009* (District Plan Change 33, 2005, Map 26) as shown by the brown hatched line. The area is visually prominent from SH1 and Grenada Village.

Due to the elevation and terrain of this area, we strongly prefer that the protection offered by the *Ridgeline and Hilltops Overlay, Visual Amenity, 2009* be maintained.

2.1 Ridgelines and Hilltops Overlay

According to the **Draft District Plan** for Glenside West, there two overlays open for discussion, a broad overlay as defined by ***District Plan Change 33, Ridgeline and Hilltops Visual Amenity, 2009*** (DPS 33), with an activity status of *Discretionary*) potentially offering good visual protection, and the narrow and much more limited **Ridgetops Overlay** as defined in the Draft District Plan with an activity status of *Non-Compliant*.

However, according to the **Proposed District Plan (PDP)** for Glenside West, there are no Ridgelines and Hilltops overlay for this area and no Ridgetops overlay either. Therefore it appears that there will be no visual protection for the ridgeline in this area at all.

The only two changes to the Draft District Plan released in 23 June 2022 relevant to the proposed Glenside West Development and supported by Council are as follows:

Para 61 (p18). The Upper Stebbings and Glenside West areas have been signalled for urban development since the early 2000s (the Northern Growth Management Plan). Upper Stebbings and the southern part of Glenside West will be re-zoned for residential purposes. This follows extensive engagement on the development of a masterplan. The remaining land on the western side of Marshall Ridge will be zoned rural area, with SNA and 'Ridgelines and Hilltops' landscape overlays protecting large areas from development.

Notes: Residential Note 2

Residential Zones p32 (bottom paragraph) states “The Hilltops and Ridgelines areas are not being retained in the residential zones due to the need to incorporate the MDRS* and insufficient grounds for them to be treated as a qualifying matter under the NPS-UD. They are retained in the other zones (primarily over open space and rural zones).”


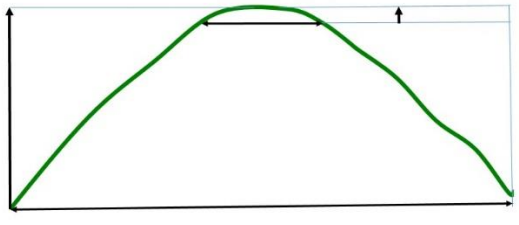
*MDRS = Medium Density Residential Standards.

It appears that the intent of the PDP is to remove the Ridgelines and Hilltops overlay protection in the Glenside West in order to allow the development and associated earthworks to occur, using the requirements of the NPS as justification for this.

2.1.2 Ridgetops

In the Draft District Plan, there was a ridgetop area marked in medium grey which had an activity status of *Non-Compliant* which will prevent most types of buildings being constructed within the zone and is appropriate for a ridgetop. This appears to have been removed in the PDP. There do not appear to be any submissions seeking its removal.

If this proposal is still in place, our concern is that the ridgetop area is such a narrow width. It fails to reflect the topography of the ridgetop, particularly the northern half, which is gently rolling. As a result, the vertical height down from the crest of the ridge that is intended to be visually protected will be of the order of 2 -3 metres only and totally inadequate for much of the ridgetop.

	
This photo shows the gentle rolling aspect of the ridgetop looking south.	Diagram shows vertical protection offered by the Ridgelines and Hilltops Overlay (Left arrow) and by the Ridgetop Overlay (Right arrow). The ridgetop overlay protection is tiny.

We believe the Ridgetop Overlay would need to offer at least 20 metres of vertical protection in order to offer meaningful visual protection from afar.

2.1.3 Comments in Relation to DPC33 and the National Policy Statement - Urban Development (NPS)

After DPC33 was introduced by Council in 2005, several appeals were made and settled over the next few years. Some changes were made to the original proposals and the final form of DPC 33 was accepted by Council in 2009. There were appeals lodged relating to other parts of Marshall and

Ohariu ridges at the time but no appeal was lodged relating to the area covered by Glenside West so this area remains protected by DPC33 which means that only structures such as water tanks which need to be elevated qualify for being constructed in this zone.

The importance of visual protection of the 19 ridges that make up Wellington's major ridgelines and hilltops, totalling about 50 square km cannot be overemphasised. Their importance is recognised by the Northern Reserves Management Plan, 2008 (NRMP) in which the significance of Marshall Ridge in particular is alluded to several times (paras 8.3.1.1, 8.3.2.1 and 8.4.1.1), eg from para 8.3.2.1

"Marshall Ridge is valued as a critical reserve, contributing to landscape coherence and amenity, providing part of a unifying space framework and offering extremely important views to the Grenada- Newlands area, with slopes providing vital linkages and coherence across the landscape."

Visual protection is not the only benefit offered by DPC33. Most ridgelines are steep. Building on the upper slopes of ridgelines and providing adequate infrastructural services can be costly and environmentally challenging, leading to erosion, damaging slips and uncontrolled storm water runoff.

Wellington City has placed great importance in recent years in preventing urban sprawl. But urban sprawl can occur upwards as well as outwards. Both DPC 33 and NPS-UD provide mechanisms for containing and concentrating urban development within city centres and major suburban centres.

Policy 3 of the NPS lists the areas that Central Government expect will be open to housing intensification in the future as follows:

- a) city centre zones
- b) metropolitan centre zones
- c) town centre zones
- d) mixed use zones
- e) high density residential zones
- f) medium density residential zones
- g) general residential zones

Absent from the list are, ridgelines, hillsides and rural areas. This is because Central Government does not support housing intensification in these types of areas or any housing development at all other than lifestyle or large lot residential, these being at the discretion of the territorial authority. Contrary to **Residential, Note 2** in the PDP, the DPC33 **is in fact** a qualifying condition to NPS-UD and needs to be respected as such.

To reiterate the point above, Qualifying Matters are matters that might provide exemptions to NPS requirements. These only apply in built up areas. There is no need to apply a qualifying exemption in a rural area or an unbuilt ridgeline (see NPS-UD para 3.3.7, sub clause 1, Appendix 2). This issue might qualify for challenge and clarification on points of law.

For further discussion of this topic, see Appendix 1

Another matter of great concern to all Wellingtonians is whether the non-observance of ridgeline protection of parts of Marshall Ridge is a one off occurrence or a precedent for the erosion of ridgeline protection everywhere and the demise of DPC33 altogether?

2.2 Earthworks

In the Draft District Plan, Built (yellow) and Unbuilt (Light Grey) areas were defined within the proposed development area, see Fig 1. In the PDP, this differentiation appears to have been removed and the whole area now has an activity status of *Discretionary Restricted*. Earthworks of unlimited volume will be permitted over the entire area.

Our minimum requirement for these areas, should some form of development take place, is that earthworks are kept to a limited volume so that each house is required to be built on its own platform. We strongly advocate that the whole area be given an Activity Status of *Discretionary*.

2.3 Runoff and Storm Water

The PDP requires that the proposed built area within Glenside West is to be hydrologically neutral, ie that the runoff during storms will be no more intense than it is now despite the hard surfaces that go with housing development. We believe, though well intentioned, this policy is impractical. Some rain water will be captured from house roofs and directed into water tanks but this won't deal with all runoff. It also requires land owners to monitor and release water from their tanks promptly and controllably after rain. Once a tank is full it will do nothing to abate runoff.

It goes without saying that we now live at a time where storms and the damage they are causing is unprecedented and getting worse. At Wellington City Council's behest, we have a Climate Emergency to deal with the effects of climate change. But we have seen recently the damage to properties along the Porirua Stream for example in Willowbank despite the fact that much of the runoff into Porirua Stream is controlled by three detention dams, two on Stebbings Stream and one on Belmont Stream. The runoff from Glenside West will not be controlled at all which will make matters even worse and not in keeping with Council's Climate Emergency provisions.

3 Design Guides

We propose an amendment to each of the design guides for housing developments specifically in elevated areas of high visibility as follows:

3.1 Subdivision Design Guide and Earthworks

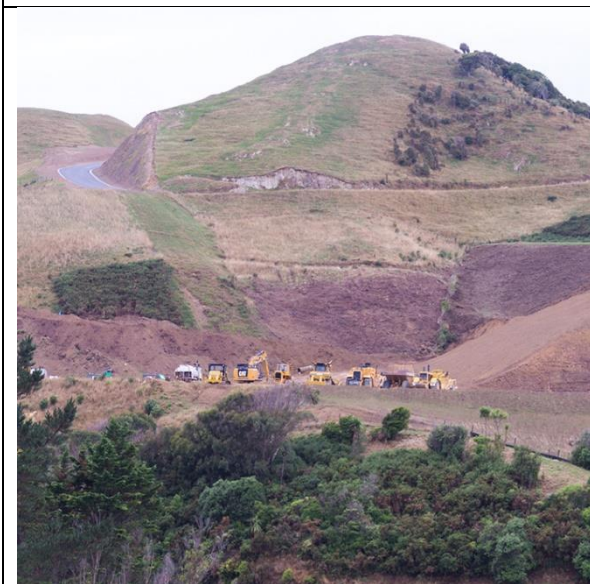
The desirability of minimising earthworks is briefly alluded to in the current Design Guide.

"Earthworks should be minimised to prevent disturbance to the natural ground form."

In Churton Park and Glenside, most housing development appears to unnecessarily maximise the volume of earthworks involved as shown in the photographs below.



Above: 2018 Cut and fill unnecessarily maximising the volume of earthworks



Above: 2018 detail of permanent visual cuts on the southern Marshall Ridgeline. Visible from most of Churton Park



Above: 2020 Steep escarpment on Reedy block, visible from north Johnsonville and most of Churton Park and Glenside village.

This practice is environmentally damaging, alters the natural landform, adversely affects visual amenity and creates hazards such as steep and unstable escarpments. Most escarpments are visible for several miles, or are right on and beneath the boundaries of neighbouring properties, and some create problems for storm water runoff.

3.1.1 EW-P20 Earthworks in Lincolnshire Farm and Upper Stebbings-Glenside West Development Areas

We don't support any earthworks in the Glenside West area as it is meant to be a protected area under DPC33.

We advocate that all earthworks in Lincolnshire Farm and Upper Stebbings-Glenside West are reclassified from Restricted Discretionary to Discretionary and that the two Wellington councils enforce this activity status rigorously.

Earth working creates noise over a wide area for long periods outside of the winter months whilst the layers of soil are being laid and compressed, and involves the unnecessary use of large quantities of diesel to power the machinery required. The CO2 produced creates an unnecessary adverse climate change impact. It also creates a dust hazard affecting people's health.

3.2 Residential Design Guide

3.2.1 Visual Appearance

There is little in this design guide that refers to the outward visual appearance of houses or other buildings. The following is located under the heading *High Quality Buildings*.

Built form Buildings are well designed, safe and provide good amenity for inhabitants and utilise materials and details that will age well over time, irrespective of style.

Where houses are visually prominent, attention needs to be paid by the architect and builder to the form, shape and colour of the building. This is especially important for houses **in high altitude locations or houses which are visible from a distance**. Where concentrated housing developments are located high on hillsides or close to ridgelines, we suggest the Design Guide refers to the preferred use of forms that harmonise with the landscape including the use where possible of natural materials, and colour schemes selected from a palette of subdued natural colours that vary from building to building.

3.2.2 Light Pollution

Light pollution is of special concern when the light arises from new, visually prominent housing developments. Light pollution from a new housing development in Glenside West will adversely affect the Glenside Valley unless measures are taken to ensure that outside lighting including street lighting is diverted downwards and shielded.

The provision on Light needs to be strengthened to minimise long distance and cross valley light pollution.

3.2.3 Future Urban Zones

As pressure to find green field sites for housing in Wellington continues to mount, it is likely that highly visible elevated areas in suburbs will come under scrutiny. There may be some support among Wellingtonians for allowing **Future Urban Zone** housing of limited scale to proceed in such areas. If such support exists, Council should consider drafting a Code of Practice for such housing developments which would include but not be limited to the elements we propose below:

- Earthworks to be redefined as Discretionary in these areas and severely limited in volume.
- New elements for house design to be mandatory including height, shape, form and colour.
- Minimisation of light pollution from such sites where they overlook rural or outer suburban areas.

6 Conclusions

Our largest current concern relates to the proposed development in Glenside West and how this should proceed in a visually prominent and environmentally sensitive location.

- We totally disagree that the NPS on housing requires council to create housing areas in highly visual and steep land close to ridgelines such as the proposed development in Glenside West and then use this as a justification for removing the visual protection offered by DPC33 in Glenside West or any other part of Wellington. We are very concerned that the justification given by Council for this to occur misinterprets the NPS with the result that one particular ridgeline is left unprotected with further ridgelines perhaps under threat in the future by the precedent that this unjustifiably sets.
- It is timely that walking tracks are created giving accessibility to the area.
- We understand that two SNAs are to be retained in this area and it is very important to us that this is the case since this will help protect native bush and streams which could otherwise be damaged by the development.
- It is timely to strengthen the Design Guides governing earthworks and housing before any developments in Upper Stebbings Valley-Glenside West or other elevated areas in Wellington proceed.

Thank you for the opportunity to comment.

Barry Blackett, M 027 244 5484

Glenside Progressive Association Inc.

Appendix 1

Comments relating to Glenside West in the Proposed District Plan are as follows:

Para 61

The Upper Stebbings and Glenside West areas have been signalled for urban development since the early 2000s (the Northern Growth Management Plan). Upper Stebbings and the southern part of Glenside West will be re-zoned for residential purposes. This follows extensive engagement on the development of a masterplan. The remaining land on the western side of Marshall Ridge will be zoned rural area, with SNA and 'Ridgelines and Hilltops' landscape overlays protecting large areas from development.

Note 2 Residential Zones

The Hilltops and Ridgelines areas (sic) are not being retained in the Residential Zones due to the need to incorporate the MDRS and insufficient grounds for them to be treated as a qualifying matter under the NPS-UD. They are retained under the other zones (primarily open space and rural zones.)

In our view, **Para 61** is misleading because it suggests the Glenside West area has been proposed for development for many years and this is not true. It was only purchased by a developer less than 15 years ago. Prior to that the previous owners (farmers) did not want to develop it. Furthermore:

1. The Northern Growth Management Plan was superseded and adopted by Council in 2004 as the Northern Growth Management Framework.
2. Glenside West was not signalled for development in the NGMF or in the Spatial Plan 2021 which is now said to supersede the NGMF.
3. There was recent engagement on development of a Spatial Plan for Upper Stebbings Valley and Glenside West but no mention was made of a Glenside West housing development encroaching on the Ridgeline and Hilltop Overlay.
4. The first time a plan was presented by Council for this development was in the Draft District Plan, October 2021.
5. There was however a hint that such a development was being proposed when plans for developing Glenside West (Reedy Block) were released in 2017.

Note 2 Residential Zones puts forward several invalid arguments as follows:

1. **"The Hilltops and Ridgelines (sic) areas are not being retained in the Residential Zones..."** makes no sense. The Ridgeline and Hilltop areas in Wellington total over 50 square km and were notified in 2005 as District Plan Change 33, Visual Amenity and adopted by Council in 2009. The particular contiguous ridgeline area surrounding Upper Stebbings Valley and Glenside West consists of Ohariu Ridge, Marshall Ridge and Spicer Forest. It is about seven square km in total. It was never part of a residential zone or retained within a residential zone. The residential zone in question, namely Glenside West doesn't yet exist. It is only proposed. No appeal was lodged between 2005 and 2009 for this area to be excluded from DPC 33.
2. The statement argues that the reason for not retaining the Ridgelines and Hilltops overlays in the residential zones is **"due to the need to incorporate the MDRS (Medium Density residential Standards) and insufficient grounds for them to be treated as a qualifying matter under the NPS-UD"**. This statement seems to suggest that DPC33 can just be discarded when housing becomes a priority. Unfortunately, it is part of the current District

Plan and was created to protect our ridgelines should they come under pressure for housing development in the future. If the intention is to modify or discard DPC33 and the visual protection that it offers to 50 square km of ridgelines within the Wellington District, this will need to be the subject of a detailed and defended proposal by Council followed by a public consultation before Council can amend it.

3. **The purpose of DPC33 is to protect our ridgelines from urban development, especially when there is a lot of pressure to develop.** The only exceptions normally considered are structures that **must** be constructed in the ridgeline zone such as water storage tanks, radio masts and cell phone towers.

4. **Notes on National Policy Statement – Urban Development**

The thrust of the NPS-UD for Tier 1 territorial authorities such as Wellington is intensification in **already urban areas (Policy 3)**.

Qualifying Matters are matters that might provide exemptions to NPS requirements. These only apply in built up areas. There is no need to apply a qualifying exemption in a rural area or an unbuilt ridgeline (see NPS-UD para 3.3.7, sub clause 1, Appendix 2).

Furthermore, Para 3.3.7 Sub clause 3 (Appendix 2) implies that, if Council wishes to declare an area within the Ridgelines and Hilltops Overlay as defined by the existing District Plan (DPC33) as a (medium density) housing area (MDHA), then Council must change the relevant provision of the District Plan, ie modify DPC33 by following the proper procedures for such a change, not just ignore it.

Appendix 2 Extract from the National Policy Statement - Urban Development

Para 3.3.7 Monitoring development outcomes

1 Every tier 1 territorial authority must monitor the extent to which development is occurring in each of the following zones as anticipated by the development outcomes included in the objectives for the zone:

- a) city centre zonesmetropolitan centre zones
- b) town centre zones
- c) mixed use zones
- d) high density residential zones
- e) medium density residential zones
- f) general residential zones.

2 If monitoring under this clause indicates that development outcomes are not being realised, the territorial authority must, as soon as practicable:

undertake an assessment to identify whether provisions of the district plan (individually and cumulatively), or any other factors (and if so, what factors), or both, are contributing to the failure to realise development outcomes; and give public notice (as defined in the Act) of the results of the assessment.

3 If the assessment indicates that provisions of a district plan are contributing to the failure to realise development outcomes, the territorial authority must change its district plan to address the deficiency.

4 If the assessment indicates that other factors are contributing to the failure to realise development outcomes, the territorial authority must consider alternative methods to improve the rate of realisation (such as the use of incentives for site amalgamation).

5 Any plan change required under sub clause (3) must be notified as soon as practicable, and no later than 12 months after the assessment is publicly notified.