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## **Glenside Progressive Association (GPA)**

### **Submission to the Wellington City Council Draft District Plan for Wellington City – Focus on Glenside 14 December 2021**

#### **Summary**

The GPA supports most of the proposals made in the Draft Plan for Upper Stebbings Valley but want to see major changes to the proposals for West Glenside. We also support the SNAs proposed for Glenside West but have concerns that they will not achieve the protection expected of them by Council.

These are the changes the GPA would like to see incorporated before the Plan goes out for final consultation next year.

- The road connection with Tawa should be reinstated.
- Glenside West should be reclassified as **Large Lot Residential** and any Built Area given an Activity Status of Discretionary.
- Earthworks should be kept to a minimum.
- The Ridgetop area should be widened to allow for meaningful vertical visual protection.
- The Subdivision Design Guide section G13 covering earthworks should be greatly strengthened.
- The Residential Design Guide, section on Build Form should be strengthened to include form, colour and light pollution for housing that is visually prominent.
- Note in the Plan that Number 246 Middleton Road now has Heritage Historic Reserve status.
- Include three historic features in the Plan, namely the railway survey peg, the milkstand and the area of the 1841 gravesite.

#### **Introduction**

Our submission is divided into three parts.

Part 1 relates to the new development in Upper Stebbings Valley. It also relates to the Glenside West Development Area where our focus is on what is proposed for Glenside West as described primarily in *Part 3 DEV3* and *APP13* of the Draft Plan. It includes a section on suggested additions to the design guides.

Part 2 deals with issues relating mostly to the preservation of SNAs.

Part 3 relates to historic sites and a notable view shaft within Glenside.

# **1 Upper Stebbings Valley and Glenside West**

## **1.1. Area Specific Matters for both areas**

We support most of the provisions outlined in Part 3 of the Draft Plan, *Area Specific Matters, DEV3*, in particular:

- The requirement specified in the Plan to limit housing to areas designated as Built Areas.
- The use of diverse and mixed housing.
- Adherence to the Subdivision and Residential Design Guides.
- The protection of natural streams as far as is possible.
- Maximum use of porous areas to offset the effects of hard surfaces so as to maintain hydrological neutrality and minimise downstream flooding and erosion.
- Good access to open spaces.
- Use of small neighbourhood and pocket parks to fill awkward spaces.
- We would like to see the above two Design Guides strengthened to cater particularly for housing on steep and high-altitude terrain (see below).

## **1.2 Upper Stebbings Valley Only**

We have previously supported developing Upper Stebbings Valley (Spatial Plan) and now reinforce our views below.

- The Primary Road proposed for Upper Stebbings Valley in the map in APP13 is well located and suited to a bus route that is within walking distance of all housing.
- The map in APP13 appears to protect ridgetops, native bush remnants and major streams reasonably well.
- It might be possible to protect some minor streams by using pocket parks or pocket spaces at the right locations within housing areas.
- Overall housing density is about right.
- Provision of some terrace and duplex housing is welcomed. These need to be located close to bus stops since some occupiers might not have cars.
- Proposed walkways are well located.
- We support the construction of housing supported by piled footings where appropriate to minimise earthworks on steep slopes.
- We would like to see provision for possible infill housing in future expressly prohibited. Later infill housing changes amenity for the worse, creates many problems for neighbours during construction and is expensive to build.
- We understand that the developer might have a different vision for the street layout than the one proposed but it is important that Council enforce the principles inherent in the proposed scheme, especially regarding the circular road (bus route), overall intensity, the protection of streams, bush and ridgelines, and minimisation of earthworks.

### **1.2.1 Connection with Tawa**

We strongly support making a road connection between Upper Stebbings Valley and Tawa which will provide a key bus link to Takapu Train Station and access to Tawa shops. It would also provide relief to traffic emerging from Westchester Drive to SH1 at the Glenside Interchange (which is already becoming overwhelmed during peak traffic) and for an alternative emergency route to the area.

The route we favour is a graded road through the upper half of Arohata Prison land currently in pine forest. This is a more direct route than other alternatives and would not be strongly opposed by Redwood residents. Additional quite desirable housing could be built on either side of the new road link.

The road link would then pass between Arohata's Driveway and Sunrise Boulevard without encroaching on either, and emerge onto Main Road. It may be necessary to relocate some small Arohata outer buildings for this option to be viable which would of course need to be at Council's expense.

We question the recent opinion aired within Council that any route through Arohata land would be too steep to complete this link. The link may have to be constructed as a semi-loop or zigzag but this would provide more opportunity for housing and would still be a shorter more direct route to Main Road and Takapu Train Station than other options such as the Greyfriar link proposed in the past.

We encourage Council to work with central government to have this land released for roading to support the Upper Stebbings Valley housing development.

### 1.3 Glenside West

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

Due to the elevation and terrain of this area, we advocate that the whole area be reclassified as **Large Lot Residential** which would allow housing to be constructed on larger lots, thus reducing the impact of land clearance on natural vegetation, earthworks on sedimentation, hard surfaces on storm water runoff and the visual impact of a concentrated housing development in a high altitude and visually prominent position.

If the development is to proceed (under the **Special Purpose Urban Residential** category), we support the provisions of DEV3-APP-R4 related to open spaces and DEV3-App-R5 related to road connections, cycle ways and safety.

However, we are concerned that the development will allow a concentration of main buildings of height 8m plus 1m for rooftops (DEV3-S1) in this area which will have the adverse impacts mentioned above.


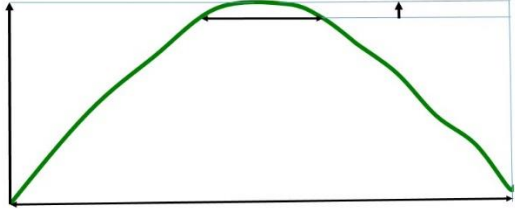
#### 1.3.1 Earthworks

Because the Built area has an activity status of Restricted Discretionary, earthworks of unlimited volume will be permitted and these earthworks will be allowed to spill over into the adjacent Unbuilt Areas as described on the map. The descriptor allows for cut and fill batters in these areas and recreational areas but not for buildings. It is unclear however whether a resource consent under the Activity Status (Discretionary) could later be obtained for constructing buildings in the Unbuilt areas as well.

Our minimum requirement for these areas is that earthworks are kept to a limited volume so that each house is required to be built on its own platform. The need for cut and fill batters encroaching on the Unbuilt areas will thereby be minimised. To achieve this outcome, it may be necessary to define the Activity Status of the Built area as Discretionary as well as the Unbuilt areas.

### 1.3.2 Ridgetops

The Ridgetop area marked in medium grey has an activity status of Non-Compliant which is appropriate for a ridgeline. 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 inadequate for much of the ridgetop.

	
<p>This photo shows the gentle rolling aspect of the ridgetop looking south.</p>	<p>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.</p>

We believe the Ridgetop Overlay should be at least 20 metres vertical in order to offer meaningful visual protection.

### 1.3.3 Ridgelines and Hilltops Overlay

Apparently, there will now be two overlays, a broad overlay as defined by ***District Plan Change 33, Ridgeline and Hilltops Visual Amenity, 2005*** (with an activity status of Discretionary) potentially offering good visual protection, and the narrow and much more limited Ridgetops Overlay as defined in the current draft District Plan Change with an activity status of Non-Compliant.

It appears that the intent of the draft District Plan Change is to remove the Ridgelines and Hilltops overlay protection in the Glenside West, Built Area (proposed as Discretionary Restricted) in order to allow the development and associated earthworks to occur. This however can only be done following a consultation process leading to a change to District Plan Change 33.

The current process is a complete revision of the District Plan which is of course a change but no express proposal has been made to remove the Glenside West Built portion of the Ridgelines and Hilltops Overlay in the Draft Plan or in any accompanying communications hence a consultation cannot be said to have occurred.

The alternative is to leave the Built area inside the Ridgelines overlay and reclassify it as Discretionary (Unrestricted) in keeping with its current activity status. This will impose desirable restraints on the earthworks that can be carried out and on the visible form of the built subdivision.

## 1.4 Design Guides

In the light of the above discussion, we propose an amendment to each of the design guides for housing developments.

### 1.4.1 Subdivision Design Guide

The desirability of minimising earthworks is briefly alluded to in G13.

“Minimise any earthworks disturbance to the natural ground form.”

In Churton Park and Glenside, most housing development appears to unnecessarily maximise the volume of earthworks involved.



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.

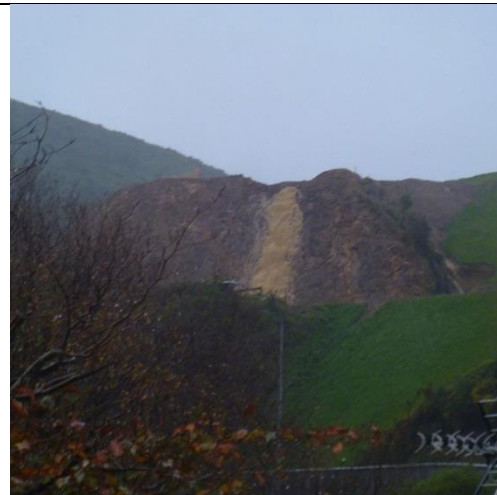
This practice is environmentally damaging, alters the natural landform, adversely affects visual amenity and creates hazards such as steep and unstable escarpments.



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.



2018 Sediment caused by earthworks on 28 Westchester Drive



2020 May. Waterfall on 28 Westchester Drive resulting from poor water run-off management

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.

	
<p>2018 Example of Council and developer not managing the dust on the Reedy block, 28 Westchester Drive</p>	<p>2020 Unmanaged dust from Reedy block on trampoline in Glenside Village</p>

We ask that G13 be greatly strengthened and rewritten to better manage the above impacts.

We advocate that all earthworks that are more than superficial are reclassified from Restricted Discretionary to Discretionary and that the two Wellington councils enforce this activity status rigorously.

#### 1.4.2 Residential Design Guide

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.

The section on lighting includes the following

G72. Direct lighting away from windows in neighbouring buildings.

Other than this, there is no reference to 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. G72 needs to be strengthened to minimise long distance and cross valley light pollution.

### 1.4.3 Special Purpose Housing Developments

As pressure to find green field sites for housing in Wellington continues to mount, it is likely that areas above the Ridgelines and Hilltops Overlay in other suburbs will come under scrutiny. There may be some support among Wellingtonians for allowing **special purpose** housing developments of limited scale to proceed above the overlay. If such support exists, Council might like to 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.

## 2 Significant Natural Areas (SNAs)

### 2.1 Significant Natural Areas (SNAs) in Glenside West

We support the identification of bush remnants within Glenside as Significant Natural Areas (SNAs) which should be protected and retained. However, it would appear that the proposed SNA's at 395 Middleton Road are for only part of the native bush remnants. All of the bush should be included in the SNA.



**Area of 395 Middleton Road showing land proposed for development between two bush blocks.  
Photo taken 2021**

On block 395 Middleton Road, the draft plan proposes that the land between two SNA's (see photo above) is **Special Purpose Future Urban Zone**. The Council proposes an urban road be built across an area marked as an SNA (the bush block shown left in the above photo), and that the hilltops are to be cut down and rammed into the gullies and ephemeral streams flowing into this SNA block.



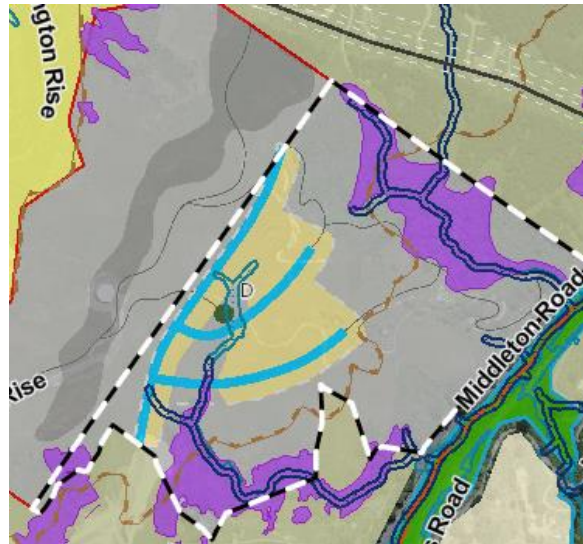


Image above shows roading in bright blue across SNA and epherimal streams.

There is already a current issue with streams originating on 395 Middleton Road, overflowing in storm events, eroding and carrying sediment onto Middleton Road resulting in road closures. Middleton road is the only alternative road, apart from the motorway, between Johnsonville and Tawa.

By filling in the epherimal streams of the upper catchment in the SNA designated area, and above the SNA designated area, the water dispersal will be made worse. Water run-off will deposit silt and destabilise trees in the SNA block. This will cause washouts and sediment flows onto the property 375 Middleton Road, which is immediately below 395 Middleton Road, and onto Middleton road and impact properties downstream to Willowbank and Tawa.

The land above and surrounding the SNA is not suitable for the Special Purpose Future Urban Zone density housing proposed in the draft Plan.

We ask that the zone is changed from **Special Purpose Future Urban Zone** to **Large Lot Residential Zone** with less invasive roading and minimal cut and fill. This will reduce the impact on the SNA areas and enable all of the bush to be included in the SNA area.

265 Middleton Rd in 2016	281 Middleton Rd 17/07/21	11 Willowbank Rd 23/07/21
Storm water damage		

### 2.1.1 How will SNA sites be protected?

SNA's need better protection than an aerial map in a District plan that has no defined boundaries or GPS points.



**2016 Spray damage at 395 Middleton Road**

We recommend that the SNA's include a buffer zone to reduce the impact of herbicide on the Glenside West bush fringes and in creek valleys, well in advance of any development. There is a risk that the SNA's in Glenside will be continually eroded and made smaller by landowners using spray, by felling bush and crushing bush and by grazing. The above photograph illustrates damage to regenerating scrub/bush by spraying.

The example below is the result of earthworks replacing bush at 28 Westchester Drive, which under the proposed District Plan, would likely have been a site included in an SNA.



2018 28 Westchester Drive, the Reedy bock during earthworks, covered in bush



2021, June. Reedy block, 28 Westchester Drive streams filled, covered in gorse

The SNA's in Glenside should be fenced so that their boundary is clearly marked to prevent developer encroachment before any earthworks take place.

### 2.1.2 Extend SNA concept

We want to see the concept of SNAs (or equivalent) extended in future to areas that were previously not significant but have been restored to the level where they justify being classified as significant noting that a lot of community effort is being put into weed removal, native planting and restoration of some ecologically important areas.

In particular, we include the Lower Stebbings Stream Restoration area as a candidate for consideration under this heading in due course.

## 3. Heritage

### 3.1 Glenside Reserve being Lots 246, 248 and 250 Middleton Road



Three lots form the larger block of the Glenside Reserve but only lot Number 246 is referred to in the Draft District Plan. 248 and 250 should be included in the search feature as Open Space. In 2013, number 246 Middleton Road (circled in red above) was gazetted as changing from Recreation Reserve to Heritage Historic Reserve status however this not reflected on the plan and probably should be, as it changes the activities permitted on the site. Reference below:

*Pursuant to section 24 of the Reserves Act 1977, the Wellington City Council hereby gives notice that: Following a resolution dated the 28th day of August 2013, the classification of the reserve described in the Second Schedule to this notice is hereby changed from recreation reserve to historic reserve for the purposes specified in section 18 of the Reserves Act 1977.*

### 3.2 Historic Sites

#### 3.2.1 New heritage sites

The Association has recently made submissions to the Heritage Unit asking them to list two new heritage sites in Glenside. These are:

- **A survey marker** for the centre line of the railway tunnel, and view shaft on property 395 Middleton Road. Support for this heritage nomination is attached in Appendix A, B, C, from Glenside Progressive Assn. Inc, the Tawa Historical Society and the Rail Heritage Trust. Part of Lot 2 DP76164. Approximate location of marker 41.197092, 174.820693
- **A concrete milkstand** on road reserve. Approximate location 41.20574 174.81178. Appendix D refers.



We would like these sites to be included on the proposed District Plan.

### 3.2.2 Burial site 28 Westchester Drive

There is a well-recognised but unmarked **burial site at 28 Westchester Drive**.



In 1841, a woman was buried on block 28 Westchester Drive in the vicinity of the red dots on the map above. It is possible the corrugated shed on the site was built over her. A significant memorial has been constructed by Council on Westchester Drive nearby but the actual burial site was not found at the time.

Council planners need to be aware that the actual site is not the Gravesite Memorial so that earthworks are not mistakenly approved and her bones disturbed. We ask that the general site be marked in some way on the District Plan.

## Conclusion

Revising the District Plan is an opportunity to update and fill gaps in earlier plans, and set new standards.

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. It is timely that walking tracks are created giving accessibility to the area and that SNAs are recognised. These 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 the Stebbings Valley and Glenside West housing developments proceed.

We have also made some proposals for documenting and protecting heritage in our suburb.

Thank you for the opportunity to comment.

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Glenside Progressive Association Inc.