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Glenside Progressive Association (GPA)

Supplementary Submission to the Wellington City Council Proposed District Plan for Wellington City – Focus on Glenside 25 November 2022

1 Summary

This submission should be read in conjunction with our earlier submission dated 24 September 2022. We take this opportunity to comment on three submissions made by Mr Rod Halliday on behalf of Stebbings Farmlands and other housing development companies, numbered Reference Number 19 of 25 August 2022, Reference Number 10 of 25 August 2022 and Reference Number 108 of 12 September 2022. The parts of Mr Halliday's three submissions we oppose and what we propose instead are specified in the relevant sections of our submission.

One of his submissions (Ref No 108) relates to the proposed development in Glenside West. We also take the opportunity to highlight parts of a report by Boffa Miskell, 2018 that has a lot of relevance to the proposed Glenside West development.

2 Submission Reference Number 19 - Three Waters / Policies

Mr Halliday submits that Rule R5 requiring hydrological neutrality for any new housing development should not apply to the Upper Stebbings Valley or Seton Nossiter catchments because both these catchments are protected by detention dams.

Serious flooding has occurred in the past from these catchments including some events after the detention dams were constructed. Stebbings detention dam was completed in 1994 and is designed to hold back water arising from a one on one-hundred-year flood event, a target that is now unlikely to be met due to the accelerating effects of climate change.

The photos below are of the upper side of Stebbings Dam taken during a flood event on 13 May 2015 which is well before any significant housing development had taken place in the Stebbings Valley catchment, i.e. before hard surfaces of any significance had been instated above the dam. They show that the water level has risen to well above the bottom of the dam. There have been several other similar flood events since the nationwide floods of 2004, including those in August 2016, July 2020 (Seton Nossiter catchment) and in July and December 2021.

Our Association represents residents who have been seriously affected by such flood events on many occasions.

Remedy we seek: We urge that Rule 5 be maintained for developments in these two catchments.

Also on this matter, our Association has asked Greater Wellington Regional Council on several occasions recently to implement electronic monitoring capable of measuring the maximum water level on the upper side of the dam during flood events.

It would be useful to combine this with maximum water velocity monitoring as well, bearing in mind that the hydrostatic pressure produced by a high-water level on the upside of the dam will increase water flow rates under the dam and hence the severity of flooding downstream of the dam.

We ask that WCC will discuss this proposal with GWRC and advocate that it be given a high priority.



Stebbings Dam 2015



Seton Nossitor 2020



Glenside 2021

3 Submission Reference Number 10 - Upper Stebbings and Glenside West

Point 10.1 Provision: Roads DEV3-APP-R5

Mr Halliday objects to being required to design an intersection connecting a road from the Development Area to Westchester Drive on the grounds that design specifications exist already. The points he makes are perhaps esoteric points. However our Association supports the development of Te Kaha road connecting the Reedy Block directly to Westchester Drive.

Currently construction vehicles drive several km out of their way to the Reedy block development site through urban Churton Park resulting in unnecessary wear and tear of Council roading, creating emissions which can be avoided and causing driver conflict at the Melksham-Westchester-New World intersections. We believe there are significant advantages in having this direct link constructed right away, and prior to any further development.

Remedy we seek: We would like to see Council make constructing this link a requirement in readiness for any further development within the Reedy Block and ultimately as a second more direct link to nearby suburbs and the motorway.

4 Submission Reference Number 108 – Upper Stebbings and Glenside West

Point 108.1 Standards / Built Areas / DEV3-S10 Permeable Surface Area

Mr Halliday asks for relief that the requirement for permeable surfaces in Glenside West be reduced from 30% to 20%.

Our Association represents residents who live below the proposed development and residents who live close to the Porirua Stream along Willowbank Road. They will all be seriously adversely affected by this relaxation. In fact, we believe any housing development on this slope should be hydrologically neutral. Because this is almost certainly unachievable, we oppose any high or medium density housing development in this area at all and have limited our support to Large Lot Residential only.

Remedy we seek: We would like this area to be limited to lower density development such as Large Lot Residential and, regardless of outcome, apply the appropriate standard for permeable surfaces that avoids any increase in flooding or risk of slips.

Point 108.4 Standards / Built Areas / DEV3-S15 Minimum Density

Mr Halliday asks for clarity around the rule requiring 20 housing units per hectare.

In our earlier submission we made the point that the Medium Density Residential Standards (MDRS) as defined in the Government's Policy Statement on Urban Development do not apply to areas such as Glenside West at all and should not be a factor to take into account in the District Plan for Glenside West. This is made clear in Policy 3 of the Statement where rural areas, hillsides and ridgelines are not included. Areas covered by Policy 3 are:

- 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

Remedy we seek: Acknowledgement by Council that the Government's Policy Statement on Urban Development does not apply to areas such as this.

Point 108.10 Planning Maps / Streams



Area of 395 Middleton Road showing bush gullies and SNAs, taken February 2022

Mr Halliday contends that ephemeral streams in the proposed development area have been incorrectly mapped. We are not in a position to comment on the veracity of this statement but if any development is to take place, it is important that the lie of the land including gullies is accurately mapped, that these are not filled in during earthworks and that roads are planned to avoid them. Refer to Boffa Miskell report, ***Upper Stebbings Valley Wellington Landscape and Ecology Analysis (2018)***, map of streams, refer to p 7 of this submission.



Area of 395 Middleton Road featuring the steep hilly farmland below Marshall Ridge proposed for development as part of Glenside West, taken March 2022

Remedy we seek: That any development in this area takes place with a minimum of earthworks and that natural gullies are not filled in.

Point 108.12 Planning Maps / Unbuilt Areas

Mr Halliday contends that the grey areas in the map (Fig 1) below to indicate Unbuilt Areas should be amended to allow building to take place.

Curiously, he concedes that *“Whilst it may transpire these areas are not suitable for building, then they can be left as unbuilt areas, and we prefer this approach as opposed to seeking to develop land shown as ‘unbuilt area’ that will be permanent and impossible to reverse.”*

Is he suggesting that the developers should take over the role of Council and decide for themselves what is suitable to build on?

We support unbuilt areas marked in grey remaining as 'no build' areas. We oppose any of these areas including the area marked in mustard/yellow (Fig 1 below) being used for medium density housing. Medium density housing would intrude into the hilltops and ridgelines, and any building platforms would require extensive earthworks causing sedimentation downstream and would fill existing deep gullies that contain and carry stormwater.

Filling gullies for building platforms and roading is not sustainable watershed management and does not follow UN Sustainable Development Goals for addressing Climate Change. Council should ensure any proposed development for Glenside West promotes smarter water management and climate change adaptation solutions. Additionally, Council should protect the landscape as supported by the Boffa Miskell report *ibid* (2018): p 63). Refer to p 7-9 of this submission.

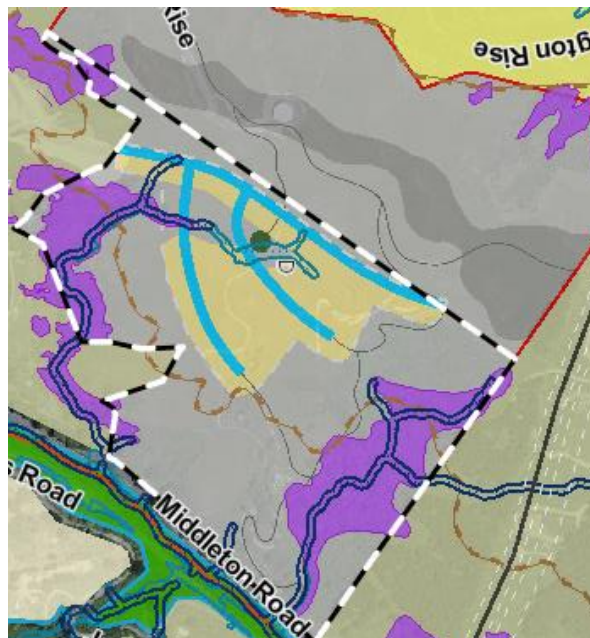


Fig 1 Map of Glenside West from the Draft District Plan

Remedy we seek: That the grey unbuilt area in Glenside West is unsuitable land for housing and that the whole area shown in mustard/yellow is limited to Large Lot Residential. Furthermore no housing is built above the current Glenside-Churton park suburb boundary in order that the ridgeline is offered at least some degree of visual protection.

Point 108.13 Planning Maps / Position of Roads

Mr Halliday asks that the positions of roads in Council's planning maps (Fig 1) be changed (Fig 2).



Fig 2 Alternative Map of Glenside West proposed by Stebbings Farmlands et al

The map (Fig 2) indicates alternative locations of roads preferred by Stebbings Farmland. It is possible that these follow gullies and ephemeral, intermittent and perennial streams. We strongly oppose a medium density housing development in this area including the roads required for this. The Boffa Miskell Report *ibid* (2018): p 10-11 identified this area as very steep. If roads are to be built, they should avoid gullies. Gullies should not be filled in to make way for them.

Remedy we seek: We strongly oppose the proposed extension of medium density housing into the areas marked with an orange hatch as not being sustainable development, and we also strongly oppose the area marked with a yellow hatch being used for Large Lot Residential housing because this area is too close to the Ridgetop.

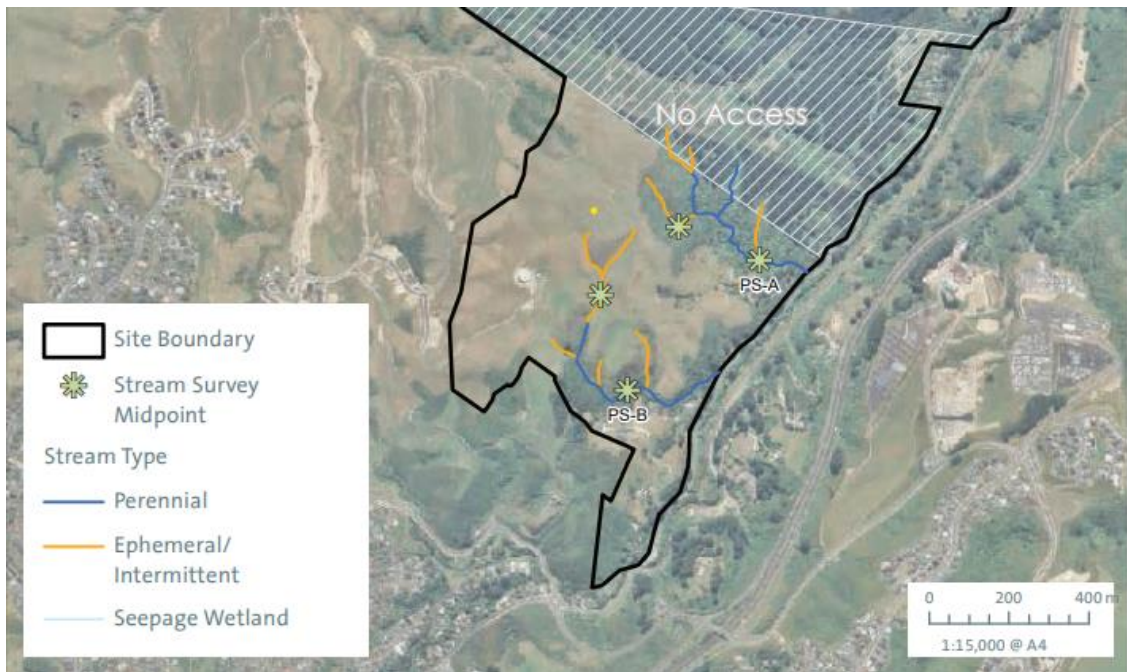
Landscape and Ecology

The Boffa Miskell report *ibid* (2018) is very pertinent when considering this development. This report identified Glenside West as having remnant forest of high ecological values, worthy of protection.

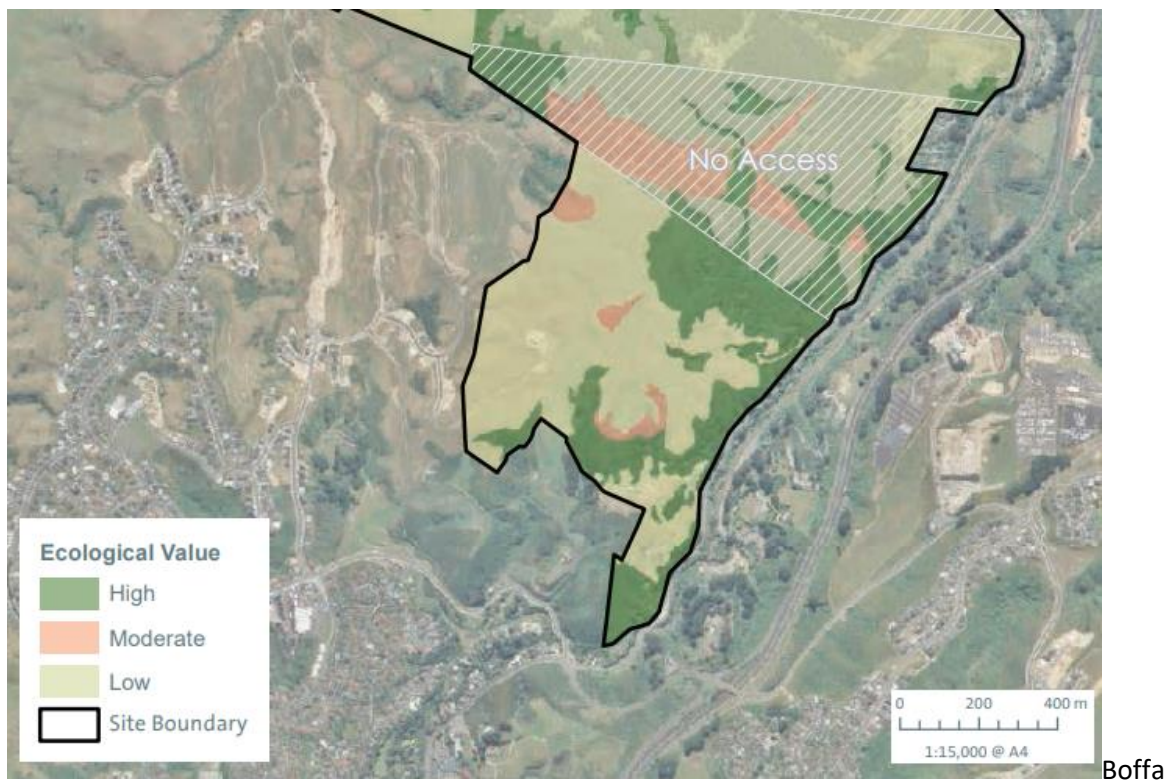
10.3 The areas of remnant forest within the site are all significant under the Regional Policy Statement. These forest types have suffered considerable loss historically and these remnants are of high ecological value which we believe supports their protection. Areas of seral scrub and low forest also occur. These have lower value currently, but provide opportunities for rehabilitation. (2018, p 63).

There are several Significant Natural Areas (SNAs) on this site. It is important that these are preserved and not impacted by development, if any development is to take place.

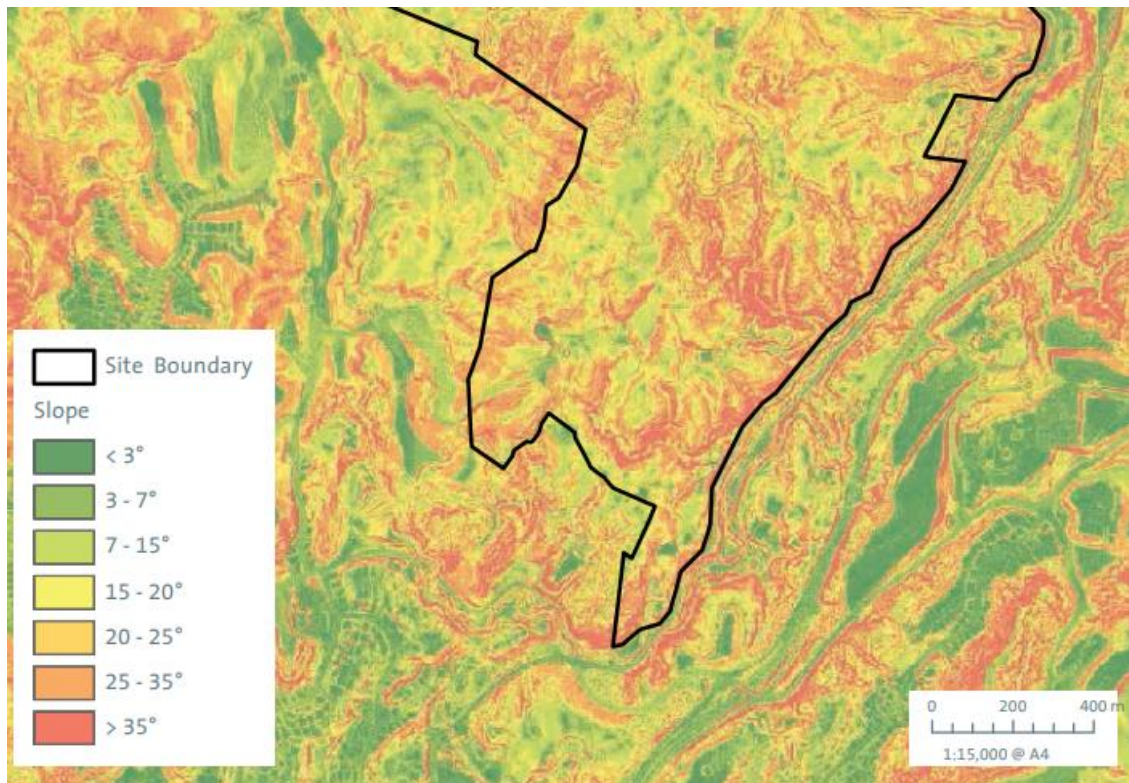
We reproduce three maps from their report to illustrate some of our points.



Boffa Miskell map showing streams in Glenside West. (2018, Fig 11. p.23).



Boffa Miskell map showing areas of high ecological value in Glenside West (2018, Fig 13. p.29).



Boffa Miskell map showing area proposed for development in Glenside West as very steep terrain (2018, Fig 13. p.11).

5 Conclusion

We believe Council should discourage medium density housing on steep terrain as proposed for Glenside West and protect this landscape as supported by the Boffa Miskell (2018) report.

This proposal which will involve the filling of gullies for building platforms and roading is old fashioned development and not in line with sustainable watershed management for minimising the impact of climate change.

We encourage Wellington City Council to manage development to protect stream ecology and native bush remnants in areas proposed for development instead of permitting developers to continue the colonising approach of filling in gullies and ephemeral, intermittent and perennial streams and felling bush for housing, which has follow-on downstream erosion and flooding impacts to roading and housing.

Thank you for the opportunity to comment.

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