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Glenside Progressive Association (GPA)

Oral Presentation on Wellington City Council Proposed District Plan -Hearing Stream 8

Natural Features and Landscapes

Ridgeline and Hilltop Overlay – Visual Amenity Supporting Notes, 1 May 2024

1 Summary

I am from the Glenside Progressive Association (PGA) and have been a committee member for many years. My presentation today focuses on DPC 33, The Ridgeline and Hilltop Overlay - Visual Amenity and its relevance to Marshall Ridge and the proposed subdivision in West Glenside. This should be considered along with the PGA's earlier submission under Hearing Stream 6, Future Urban Zone, 22 February, 2024.

I will cover the following areas:

- The evolution of the Overlay (DPC 33)
- Supporting evidence for retaining DPC 33 intact and Isthmus review.
- Is Marshall Ridge, West Glenside different?
- Past appeals to remove the Overlay
- Effect of earthworks close to the ridgeline. Stormwater runoff.
- Greenfield developments in Wellington.
- Conclusions

The Hearing Commissioners Report, April 2005 was unanimously accepted by Council at the time.

From p6 of their report:

The Panel recognises that Wellington will continue to grow, and the currently undeveloped ridgelines and hilltops will come under increasing pressure.

"We are of the view that the overlay provisions will provide an effective framework for controlling development in those areas."

2 Evolution of the Overlay

• Visual protection of ridgelines was first promoted by the 1985 District Scheme.

- DP 1994: Land to be visually protected: "....all land at the top of a ridge or a hill measured 50 metres vertically from the apex". This reflected the intent but difficult to administer.
- Boffa Miskell commissioned to resolve the issue resulting in their report of 2001.
- Proposed Plan Change 33 then drafted and received by Council, May 2004.
- Accepted unanimously by Council, 18 April 2005 following the recommendation of the Hearing Commissioners.
- Final version notified, Nov 2005.
- Variations (mostly Woodridge and Lincolnshire Farms) and appeals considered in next few years.
- Declared Operative in 2009, see Fig 1
- Isthmus commissioned to carry out a review, April, 2020.

3 Support for Retaining the Overlay Intact

The landscape studies for ridgelines and hilltops identified four key values (visual, natural, recreational and heritage) which were reflected in the mapping of the ridgeline and hilltop overlays. However, visual values played a predominant role when drawing the overlay lines.

'Higher' landscape features:

- ONL Outstanding Natural Landscapes
- **ONF** Outstanding Natural Features
- SAL Special Amenity Landscapes
- SNA Significant Natural Area

These were set aside for separate consideration.

From Isthmus Ridgelines and Hilltops Overlay, Initial Review, 2020

The following paragraphs from their review are of note:

1.9 (Summary), 5.2, 5.5, 5.7, 6.9, 6.10, 6.12 and 9.1 (Conclusions). These embody the ideas that the Overlay provides the means for achieving the following:

- continuous landforms.
- continuum of undeveloped highly visible landforms.
- Protects steep slopes from development.
- Provides visual continuity.
- continuum to provide a visible framework.
- links together the higher value landscapes.
- provides connectedness and cohesion.
- Helps protect delicate environmental features.
- Prevents upward urban sprawl.

The thrust of these concepts is that the Overlay would not achieve its purpose if treated as a piecemeal set of ridges and hilltops with no connectedness.

To remove any important part of the overlay would be to degrade the overlay as a whole.

A variety of submissions were received on the policy and rule provisions of proposed Plan Change 33 relating to aspects of Ridgelines and Hilltops, for example from the Decision Report:

Rule 15.1.10, p38 They [Truebridge Callender Beach and others] requested that the rules permit vertical cuts up to 2.5 metres as a Permitted Activity.

The Panel was of the view, however, that the proposed rule was appropriate and **that to allow larger** excavations could have significant effects on visual amenity, particularly if they were to occur on steeper areas within the identified ridgeline and hilltop areas.



Other points from their report:

- Para 7.1 Council has identified some areas [within the Overlay] suitable for growth:
 - Stebbings Valley
 - o Woodridge
 - Lincolnshire Farms

Glenside West was not mentioned.



4 Marshall Ridge - Visual Amenity

The importance of Ridgeline protection is also recognised by the Northern Reserves Management Plan, 2008 (NRMP) in which the significance of Marshall Ridge 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."

The proposed development removes this protection from Marshall Ridge (Fig 3A) which is very visible from nearby suburbs and from SH1, is unusual and visually stunning, **perhaps also qualifying as an ONL.**

Marshall Ridge is NOT inferior to the remainder of the Overlay. It is an integral part of the overlay and has a special character not widely seen in other Wellington ridgelines that demands it be preserved, see Fig 3A and 3B.





The proposed District Plan is for MDRH within the part of Marshall Ridge earlier designated as part of the Ridgeline and Hilltop overlay, Fig 2B. In both cases, housing is proposed to approach the crest of the ridgeline (Ridgetop) shown in dark grey. Housing constructed here will be very visible from nearby suburbs and SH1. Earthworks are likely to be extensive and gullies filled in. It is likely that the modified proposal by the Developer will result in more than 130 houses, ie 122 MDR houses plus eight houses on large lots and hence affect more land than Council's proposal which is for 122 houses.

5 Appeals to remove the Marshall Ridge Overlay

In 2009, Stebbings Farmlands mounted an appeal to lift the overlay on Marshall Ridge in exchange for offering a reserve along the ridgeline. As a partial relief, the western boundary of the proposed overlay was aligned with the western boundary of the proposed reserve. However, the eastern boundary of the proposed reserve remained undefined and the overlay was left in place.

In the Draft District Plan, Council proposed a narrow Ridgetop zone along the top of Marshall Ridge with the overlay remaining in place. However, the overlay was removed when moving to the Proposed District Plan in spite of universal support from participating members of the public attending the Stebbings Valley-Glenside West Spatial Plan Workshops for the overlay to be retained.

Our previous submission comments on the likely ineffectiveness of Ridgetop visual protection.

6 Effect of Earthworks

Intended earthworks plans have not been publicly notified yet, so our comments relate to nearby developments such as the Reedy Block. Here, earthworks have been used to create large flat areas on either side of new roads as housing platforms, leaving steep escarpments above and below the earth-worked areas. Figs 4A, 4B and 4C show recent examples by the same landowner developer within the Reedy Block.

Fig 4A Conversion of natural forms to large flat areas and steep escarpments – Reedy Block, Phase 3







Stormwater Runoff

Our previous submission highlighted the impact of flooding events in our area and the importance of Council's hydrological neutrality policy for all new developments in Wellington. The policy, *Reference Guide for Design Storm Hydrology, 2019*, prepared for Wellington Water by Cardno, stipulates a 30% minimum standard for permeability for new developments and makes it clear that this standard applies to flat land

(less than 5 deg in slope). Another useful reference is Wellington - Water Sensitive Urban Design – A Guide for Stormwater Management in Wellington.

Our contention is that this standard will not be able to be met for West Glenside and probably not for most MDR developments within the Ridgelines Overlay. Furthermore, there is no downstream detention dam offering some runoff protection for this site.

The effects of stormwater runoff are already seen from time to time as they affect the Reedy Block, see Fig 5



7 Greenfield Developments in Wellington

Building close to ridgelines can be costly and environmentally challenging, leading to erosion, damaging slips and uncontrolled storm water runoff. Ridgeline visual protection also acts as a constraint on such environmental impacts.

Wellington City places great importance in preventing urban sprawl. But this 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, and away from steep hillsides.

Wellington District has a severe shortage of greenfield space for new housing but this has been understood for many years. Good developments are still possible among Wellington's hills but they should preserve the

indigenous vegetation, respect natural landforms, minimise earthworks, and avoid high altitudes and steep slopes. Fig 6 illustrates what has been done in other parts of Wellington that meets these criteria.

Developments like this are in keeping with what Wellingtonians all aspire to – A city set in Nature.



7 Conclusions

The Council's proposal will place a pocket of urban housing in an isolated, elevated and unsuitable location, will involve the filling of gullies for building roads and housing platforms, will destroy an iconic landscape and is not in line with sustainable watershed management for minimising flooding and the impact of climate change.

We ask that Council value the Ridgelines and Hilltops Visual Overlay for providing coherence and continuity, restore Marshall Ridge to the Overlay, disallow pockets of medium density urban housing on steep terrain as proposed for Glenside West, protect the landscape and reclassify the area below the ridgeline (Fig 2B Orange) as Large Lot Residential. We trust that the Overlay will continue to provide a framework for controlling development as intended by Council when first adopted in 2005.

Thank you for the opportunity to make this submission.

Barry Blackett, M 027 244 5484 Glenside Progressive Association Inc. 1 May, 2024