

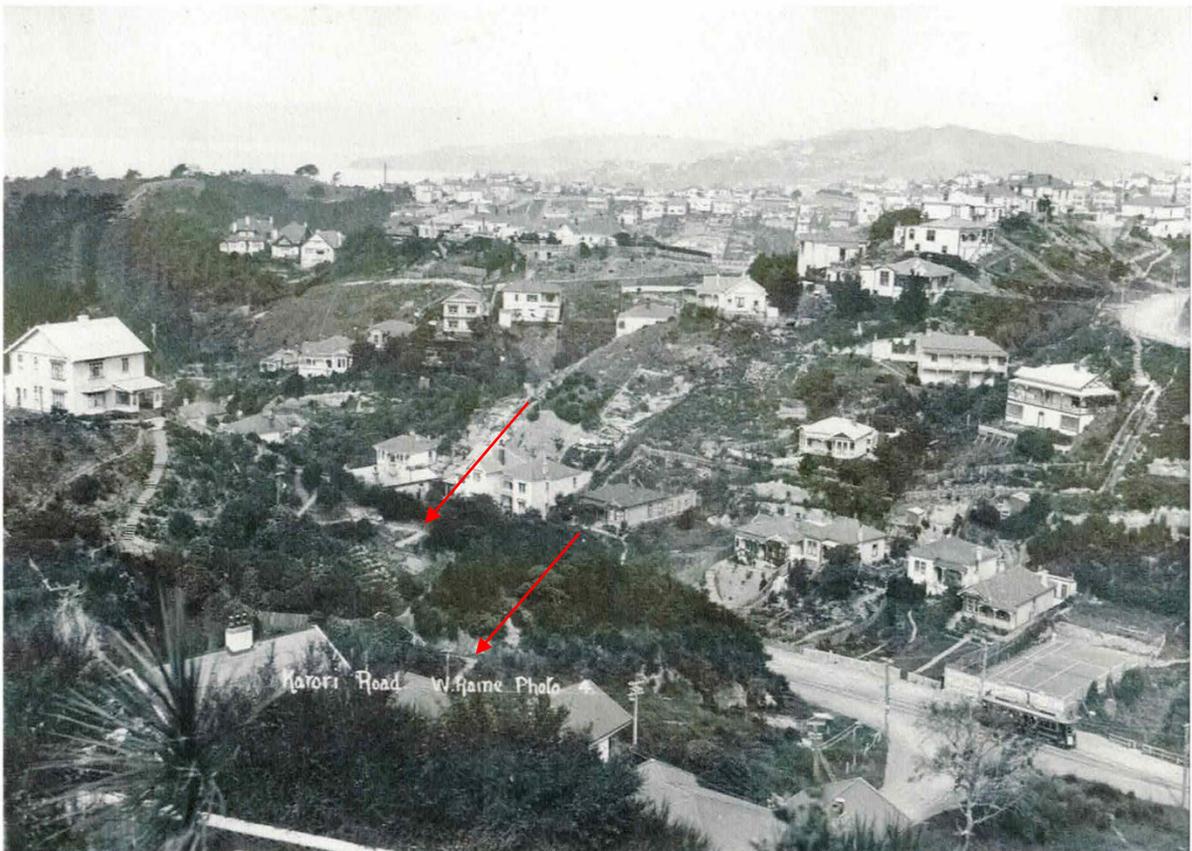
## Submission by David Edmonds on the Proposed WCC District Plan

There are two issues I wish to raise with the Panel:

### Issue 1: Vegetation Clearance Rules as they apply to Vacant Residential Lots

Since 1977 my name has been on the title of three contiguous residentially zoned lots (recently re-zoned medium density residential) in the suburb of Northland. In the recent past, the boundary between two of these lots was adjusted so that a house could be built on one of them (6 The Rigi) as a permitted activity, that is within the permitted activity building envelope.

This lot, which has an area of 733m<sup>2</sup>, is now entirely covered in native bush apart from a pathway leading through it from the road to the house at 8 The Rigi. This same pathway (arrowed) wending its way through scrub is shown in this 1920s photo from the Alexander Turnbull Library (Ref G-6690-1/2):



In the Draft District Plan, the three lots were partially covered by an SNA overlay. I did not oppose this proposal for two of these lots as they had been

cleared and developed (in the early 1900s) for a house (8 The Rigi) and garden (2 Governor Rd) respectively. However, I did make a Submission on the Draft Plan seeking removal of about 60% of the undeveloped (6 The Rigi) lot from the SNA overlay to permit the building of a house suited to the shape and topography of the lot, as shown in the following diagram:



10 Meters

- Property Boundary
- Current SNA Boundary (29/11/2019)
- Previous SNA Boundary (25/11/2019)

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In the event, the Proposed District Plan removes residentially zoned land from the SNA overlay. However, the Section 42A report recommends general restrictions on vegetation clearance such that in a residential zone a restricted discretionary activity consent would be required to build a house on this vacant lot (and that consent may contain onerous conditions or may not be granted).

The recommended vegetation clearance rule for lots in a residential zone relates to the clearance of more than 100m<sup>2</sup>, insufficient area to build even a small house. The vegetation clearance rule appears to have come from submissions by others on their perceived need to have a city-wide restriction on indigenous vegetation clearance (for example, the submission from Forest and Bird seeks a restriction on vegetation clearance of more than 200m<sup>2</sup>).

Even if the recommended clearance rule were to be changed to 200m<sup>2</sup>, which would make it possible to accommodate a house with a modest footprint, additional clearance may be needed for paths, corridors for underground services and clearance around the house to meet fire safety concerns.

I understand the tension between the desire to retain existing indigenous vegetation in the urban area and the need to provide additional housing close to the city. However, in my Further Submission on the Proposed Plan, I raised concerns about the introduction of general indigenous vegetation clearance rules proposed by others, as I consider putting a residential building on a residentially zoned lot should be a permitted activity.

The introduction of vegetation clearance rules in a district plan would have a disproportionate impact on a vacant lot as compared with a developed lot for the simple reason that clearance will have already been carried out as part of the development. The impact upon an undeveloped or vacant lot would depend upon the vegetation coverage. If the vacant lot is only partially covered by bush, a clearance rule may have no impact. However building a house on 6 The Rigi, or any other vacant, bush covered residential lot, will, of necessity, require removal of a considerable area of indigenous vegetation, in excess of any clearance rule.

My first preference would be to exempt all vacant, residentially zoned lots from any indigenous vegetation clearance rules. (I suspect there are very few vacant, bush covered, residentially zoned lots in Wellington, so an exemption of vacant lots from such rules would have little impact on the city overall).

My second preference is for 6 The Rigi to be exempt from any indigenous vegetation clearance rules. (In the case of this lot, some 40% of the lot would likely remain with bush covering following the building of a house).

## **Issue 2: SNA on Road Reserve in front of 6&8 The Rigi and 2&4 Governor Rd**

While the SNA overlay no longer includes residential lots in the Proposed District Plan, an SNA overlay on a thin strip of road reserve in front of four residential lots (6 & 8 The Rigi and 2 & 4 Governor Rd, Northland) remains. The integrity of this SNA overlay is called into question as it covers two garages, two driveways, pathways and a cable car landing but covers only minimal vegetation (of indifferent quality). I pointed this out in my Submission on the Proposed Plan, however the Section 42A report recommends that my submission be rejected as “the site was assessed by Wildlands through a desktop assessment as containing an SNA”.

On page 69 of the Section 42A report, it is noted that “now is the best time to ascertain if there are errors in identification” ...so that correction can be made ... ”before the Panel makes recommendations in respect of SNA extents”.

I have attached a few photos to support my submission that an error has been made in identification and this area does not warrant inclusion as an SNA, and should therefore be removed.

### Legend

Section S42A:  
Removed areas of  
SNA



SNA in Residential  
Areas (Not  
recommended to  
be included)

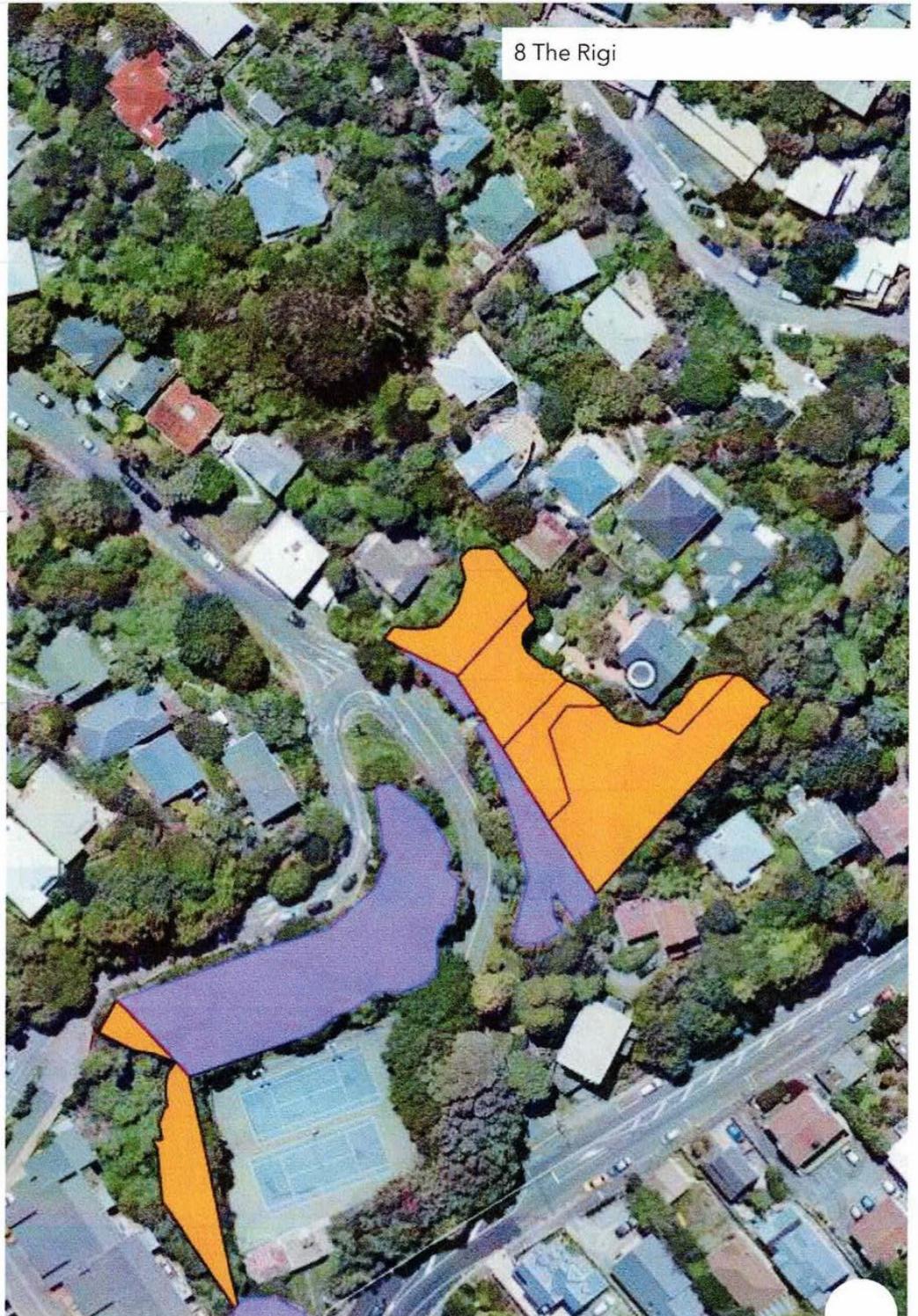


SNA Proposed  
District Plan 2022



Suburbs

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Road Reserve in front of 2&4 Governor Rd and 6&8 The Rigi