

Wellington City Council Ridgelines Hilltops Overlay Initial Review

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1.0 EXECUTIVE SUMMARY

- 1.1 Isthmus Group Limited (IGL) has carried out an initial “high-level” review of Wellington City’s Ridgelines and Hilltops Overlay (the Overlay) in the District Plan.
- 1.2 Council commissioned the work to clarify the relationship between the Ridgelines and Hilltops Overlay and the recently identified Outstanding Natural Landscapes and Features (ONFs and ONLs), and Special Amenity Landscapes (SALs) across the district - to determine the future role of the Overlay in the Plan.
- 1.3 Parts of the Overlay “cross-over” with the recently identified high-value landscape areas, particularly around urban areas. In the west and north of the district the Overlay appears more distinct from ONFs, ONLs and SALs.
- 1.4 Council is also seeking to understand the full range of natural science, sensory and shared and recognised values that are captured in the Overlay and how this might be relevant to growth planning.
- 1.5 In recent years parts of the Overlay have come under some development pressure, and this could continue, particularly where the Overlay is close to outer residential suburbs, as urban growth needs are met in line with district growth strategies. Parts of the Overlay also fall under areas identified in recent high-level re-zoning investigation work, as being suitable for further investigation, for possible future residential growth.
- 1.6 The IGL review has found that the Overlay and the recently identified higher-value landscape areas differ in their origin, and their purposes. It has also found that there will be value in retaining the Overlay within the District Plan, with an appropriate hierarchy of provisions to manage effects in its different parts.
- 1.7 The Overlay was introduced in 2009 in response to community submissions on a Proposed District Plan Change (notified in 1994) which consistently raised concerns on the effects of development on undeveloped and visually prominent ridgelines and hilltops across the district. A range of values was identified for the ridgelines and hilltops through assessment work (including natural, visual, heritage and recreation values), however, the Overlay was introduced by Council primarily to manage adverse effects on visual amenity (sensory values) in these areas, (a s7 (Other) matter under the Resource Management Act 1991), with the balance of values to be managed through other provisions.

- 1.8 ONFs, ONLs and SALs have been identified under RMA s6 (matters of national importance) and s7 (other matters), to manage effects on a full range of values identified in defined areas, in line with the Wellington Resource Policy Statement (RPS). These include natural science, and shared and recognised, as well as sensory (including visual) values.
- 1.9 The tests required to be met in relation to the identification of SAL and ONFL are set out in the RPS. They differ from the tests used to identify the Hilltops and Ridgelines. While all landscape areas, including the Ridgelines and Hilltops, have natural science, sensory, and shared and recognised factors that contribute to values, in most parts of the Overlay these do not meet the test to be identified as an SAL or ONFL. The Overlay has been defined to provide a landscape framework and visual “continuum” of relatively undeveloped, elevated landforms across the district. ONFs, ONLs and SALs are not necessarily visually prominent or connected to each other.
- 1.10 The Overlay has value in that it contributes to Wellington’s recognised landscape character and identity at a district scale with relevance to s7 matters under the RMA. Although not of ONFL/SAL status, it provides important guidance as a physical framework for development, promoting the best practice urban design principles sought in Wellington’s urban growth strategies – namely a compact urban form, connected to existing infrastructure.
- 1.11 A full summary of conclusions, with recommendations, is provided in the final section of this report.

2.0 INTRODUCTION

- 2.1 Wellington City Council (WCC) is undertaking a review of the Ridgelines and Hilltops Overlay contained in the Wellington City District Plan, in light of recent work completed to identify Outstanding Natural Landscapes and Features (ONFs and ONLs), Special Amenity Landscapes (SALs), and Significant Natural Areas (SNAs) across the district; and in light of future growth needs across Wellington district, and related development pressures on the Overlay.
- 2.2 Recently identified ONFs, ONLs, SALs, and SNAs will be incorporated into the Wellington City District Plan as part of the current Plan review, along with associated provisions.
- 2.3 Currently, the District Plan manages adverse effects on visually prominent ridgelines and hilltops across the district through a mapped Overlay, and associated provisions in zone chapters.
- 2.4 Council is seeking to clarify the relationship between the Ridgelines and Hilltops Overlay and the recently identified higher-value landscape areas - to determine the future role of the Overlay in the Plan.
- 2.5 Parts of the Overlay have been subject to development pressures in recent years. More extensive development has occurred in some areas (particularly east of Tawa/Linden). Development pressure on parts of the Overlay could continue, particularly where the Overlay is close to outer residential suburbs, as urban growth needs are met, in line with district growth strategies.
- 2.6 Council is currently undertaking growth planning work as part of the District Plan review, to update Wellington's Urban Growth Strategy 2015 with a new Spatial Plan.
- 2.7 Growth planning work is ongoing to identify prioritised (draft) areas in the Outer Residential zone for intensification. Small parts of the Outer Residential zone fall into the Overlay, in some parts of the City.
- 2.8 Recent growth planning work¹ has also identified several rural areas adjacent to the Outer Residential zone, as suitable for further consideration for possible re-zoning, to provide for new dwellings. Large parts of these areas are covered by the Overlay.
- 2.9 Considering the above, and with a particular focus on the tie-in between growth planning and protection and management of Wellington's valued landscapes, Council is seeking to understand:

¹ Wellington City District Plan Rural Land Study – Areas for Possible Re-zoning – Residential; The Property Group, 2019.

- the full range of natural science, sensory and shared and recognised values captured inside the Ridgelines and Hilltops Overlay;
- how these relate to values in recently identified ONFs, ONLs, SALs and SNAs;
- the extent to which management of the Overlay’s values should continue, and how this will interface with provisions relating to ONFs, ONLs SALs; and
- whether existing District Plan provisions have been successful in managing adverse effects on the Overlay’s values as anticipated; and, (should the Overlay remain), if a different mechanism will now be needed given inclusion of SAL and ONFL areas in the District Plan.

2.10 This report provides an initial “high-level” review of the Overlay, in relation to the above points. It follows on from an earlier initial IGL memo on the existing urban growth overlap with the Overlay and confirms/adjusts and expands on the initial findings of that memo.

3.0 METHODOLOGY FOR THE INITIAL REVIEW

- 3.1 This review has considered the technical landscape evaluations behind the identification of the Ridgelines and Hilltops Overlay, and more recent work to identify ONFs, ONLs, and SALs in the Wellington District. It has looked at the methodologies used to identify landscape boundaries and values; the values identified; and the tests applied to determine ONF/ONL and SAL status; and has considered the “cross-over” between the Overlay and the more recently identified higher-value landscape areas.
- 3.2 The District Plan review has also identified Significant Natural Areas (SNAs), relevant to s6 RMA matters.
- 3.3 As part of work to understand the development pressures on the Overlay², consideration has been given to District Plan zones in the Overlay; existing District Plan provisions relating to the Overlay; adopted growth strategies for Wellington City; and recent planning for growth work completed by Council (noting that the level of development provided for, through intensification and identified greenfield sites³, may influence the level of development sought (or needed to meet growth needs) inside the Overlay).
- 3.4 The following documents have been considered as part of this review:

² Further to the initial IGL Memo: Urban Growth Overlap - Part A of this review.

³ Stebbings Valley and Lincolnshire Farm

- Wellington’s Ridgetops and Hilltops, The Natural and Amenity Values; Boffa Miskell Ltd., 2001;
- Plan Change 33 – Section 32 Report – Part A: Ridgeline and Hilltop (Visual Amenity) Changes;
- Wellington City Landscape Evaluation, Draft Technical Assessment; Boffa Miskell Ltd., 2017;
- Wellington and Hutt City Coastal Study: Natural Character Evaluation of the Wellington City and Hutt City Coastal Environment; Boffa Miskell Ltd., 2016;
- Wellington City District Plan Rural Land Study, The Property Group (TPG), 2019;
- Draft Wellington Outer Suburbs Assessment and Evaluation, Beca & Studio Pacific Architecture (on-going work);
- Wellington Urban Growth Plan 2014 – 2043 (WCC, adopted 2015);
- Northern Area – Framework for Growth Management (WCC, 2003);
- WCC District Plan.

3.5 GIS mapping has been used to consider the relationships between the Overlay and ONFs, ONLs, SALs, SNAs, District Plan zoning, existing consented development in the Overlay, and growth planning.

4.0 RIDGELINES & HILLTOPS OVERLAY: DEVELOPMENT AND INTENT

- 4.1 The following provides a summary of main points to note on the development of/intent behind the Wellington District Plan’s Ridgelines and Hilltops Overlay (the Overlay).
- 4.2 The Overlay was developed from a study completed for Council in 2001⁴ (referred to in this report as “the study”) to assess the highly visible, relatively undeveloped ridgetops and hilltops across the Wellington District; with work from the study progressed through to the introduction of the Overlay through Plan Change 33 (PC33, 2009).
- 4.3 The main points to note from the 2001 study are:

⁴ Wellington’s Ridgetops and Hilltops: The Natural and Amenity Values, Boffa Miskell Ltd., June 2000.

- The study was commissioned by Council as a result of public submissions on the (at that time) Proposed Wellington City District Plan⁵, which consistently raised concerns on the effects of development on the district’s undeveloped ridges and hills;⁶
- The brief for the assessment reflected Council’s view that consideration of amenity values (RMA s7) was key to managing Wellington’s ridgetops and hilltops (in line with submissions received on the Proposed District Plan). The brief specified that the study should not “rank” ridgetops and hilltops, but should identify the intrinsic natural values and the amenity values of ridgetops and hilltops, and recommend a management regime;
- The 2001 study identified a range of values for the ridgetops and hilltops, including natural values, visual values, heritage values and recreation values;⁷
- The study identified main *ridgelines* and associated *landforms*, with associated values at two scales – importance to the district; and importance at a more localised community level;
- At the district scale, certain ridges and hills were noted as being particularly important in shaping the district’s settlement patterns and influencing the character of Wellington. The identified main ridges physically define broadscale areas so that Wellington is made up of a series of clearly recognisable geographic communities.

4.4 Work progressed from the 2001 study to map the Overlay as a “drape” over main ridges and hilltops, and include associated provisions, for introduction to the District Plan through Plan Change 33 (PC33). The main points to note from PC33 are:

- The Overlay was introduced primarily to manage effects on the visual amenity of the undeveloped ridgelines and hilltops. The PC33 section 32 report noted that while all values identified in the 2001 study were relevant (to varying degrees) to the extent of the Overlay⁸, Council considered that recreation, heritage and natural values were more appropriately dealt with by the policy/plans which specifically administer them.

⁵ Notified in 1994 (as referenced in the Plan Change 33 Section 32 report, pg. 1)

⁶ Public submissions consistently called for protection of natural skylines, natural backdrops, open space, ecology, vegetation and habitats, natural character, cultural heritage and views, and expressed concern about intrusive development and housing on ridgetops and hilltops - stressing a desire to retain undeveloped ridges and hills as a “natural backdrop to Wellington.” Submissions on the rural areas of the district echoed these views, highlighting the potential adverse effects on rural character of development on ridgelines, hilltops and spur crests. Refer to pgs. 1, 11 of the 2001 Boffa Miskell Wellington Ridgetops and Hilltops Study.

⁷ Values identified as criteria for the assessment were based on public feedback on the Proposed Plan.

⁸ PC 33 Section 32 report, page 2.

Addressing all values was seen as problematic within Overlay provisions, as it was not clear where some particular values applied;

- Mapping of the Overlay “drape” was based on district wide and local scale visibility, slope, and landform “continuum”.⁹ This means that visual continuity of ridgelines and hilltops landform was considered important, even if all parts of the Overlay did not hold equal visual values. The approach was described as being based on visual amenity (as opposed to “visibility” alone), and provided for whole landforms. It sought to avoid a patchwork of ridgeline and hilltop areas with controls relating only to “patchwork” areas;
- PC33 suggested that there could be variable permissibility across the Overlay¹⁰, influenced by likely visual amenity impact. (PC33 introduced the Overlay as three overlapping “layers” – High visibility within district; High visibility within community (with these two “layers” being subsets of the complete Overlay area); Identified ridgeline/hilltop).

4.5 The Ridgelines and Hilltops Overlay became operative in the District Plan in 2009.

5.0 RELATIONSHIP OF OVERLAY TO ONLS, ONFS, SALS, AND SNAS

- 5.1 In reviewing the studies to identify the Overlay (2001)¹¹ and the ONFs/ONLS/SALS (2017)¹², it has become clear that there are fundamental differences in the planning and policy directives behind each of the studies, as well as the methodologies employed.
- 5.2 There is some physical cross-over between the Overlay and some of the more recently identified higher-value landscape areas. This is to be expected as both studies considered natural science, sensory, and shared and recognised factors. However, there are also differences arising from the tests applied to evaluate these areas. ONFL and SAL are identified under tests set out in the RPS. The Hilltops and ridgelines are intended to capture continuous landforms with a range of landscape values that have district or community visual amenity.
- 5.3 Under the RPS, Outstanding areas must be:

- a. exceptional or out of the ordinary; and

⁹ Based on intervisibility and slope maps contained in the 2001 Ridgelines and Hilltops Study, Boffa Miskell 2001. (Refer also Plan Change 33 Section 32 report, para 2.1.)

¹⁰ PC33 Section 32 report; page 7.

¹¹ Wellington’s Ridgelines and Hilltops: The Natural and Amenity Values, Boffa Miskell Ltd., June 2000

¹² Wellington City Landscape Evaluation, Draft Technical Assessment; Boffa Miskell Ltd. 2017.

b. with natural components dominating over the influence of human activity.

(taking into account natural science, sensory and shared and recognised factors);

5.4 Under the RPS, SALs must contain:

a. highly valued, but not clearly exceptional landscape values, in an area where the natural components of landscape character dominate; or

b. highly valued, including exceptional landscape values, in an area where the modification of landscape by human activity is a dominant influence on landscape character.

5.5 The following table provides a comparison between the Overlay, and the ONFs, ONLs, and SALs:

| 2001 Ridgetops and Hilltops Study; PC33 Overlay | 2017 Landscape Study: ONFs/ONLs/SALs |
|--|--|
| Does not “rank” landscape areas, but identifies the amenity values (RMA s7) of prominent ridgelines and hilltops. | Undertaken to identify outstanding and special amenity landscapes, as required by RMA s6 and s7. |
| Methodology has considered similar information to factors outlined in the Wellington Regional Policy Statement (RPS), but is grouped differently (based on older methodology), and drawn from a more limited range of sources - primarily from the District Plan and council in-house information. | Methodology has aligned with the RPS and has been more comprehensive, with a wider range of technical information sources available and included. |
| Focused on (relatively) undeveloped, elevated ridgetops and hilltops only. | A district-wide study. |
| Defined to provide a “continuum” of relatively undeveloped, highly visible landforms across the district. | Defines areas which meet the tests for outstanding or special amenity status, in line with the RPS; these areas do not need to be highly visible or connected to each other. |

| | |
|---|---|
| <p>A range of values for elevated ridgetops and hilltops were identified, but District Plan Overlay provisions seek to manage effects relating primarily to visual amenity (with management of other ridgeline and hilltop values through other relevant parts of the Plan, such as the Heritage Chapter¹³).</p> | <p>ONFs, ONLs, and SALs contain values across the range of natural science, sensory and shared and recognised factors, which will all need to be recognised in provisions linked to the areas.</p> |
| <p>Boundary is defined by visibility, slope (steepness) and landform continuum (visual continuity). Boundary is not influenced by natural science factors contributing value.</p> | <p>For ONLs/ONFs, the RPS has been interpreted to give weight to natural science and sensory factors, to meet the “test” threshold (and areas of indigenous vegetation considered in some instances, when defining boundaries, although generally following a landform approach).</p> |
| <p>Identification of shared and recognised values is acknowledged in the 2001 Overlay study as being limited, due to a lack of input from iwi, and the scope of the study generally. Provisions focus on protecting visual amenity.</p> | <p>For SALs, the RPS has been interpreted to give weight to shared and recognised values. This means that while visual amenity is a consideration to determine SALs, it is considered less important than shared and recognised values.</p> |

- 5.6 In summary, ONFs, ONLs, and SALs have been identified for a range of factors, with areas defined by topography and vegetation extent to capture values that, in combination, meet the RPS tests.
- 5.7 The Overlay captures areas with a range of landscape values, with the boundary and provisions defined primarily to manage effects on visual amenity, and the boundary set through a consideration of visibility, slope and landform “continuum”¹⁴.
- 5.8 It is likely that the more recent ONFs, ONLs and SALs have captured some of the higher-value natural, heritage and recreation values identified in the ridgetop and hilltop areas by the 2001 study, with those values now mapped to specific areas, where they are concentrated enough to meet the RPS tests. These areas are likely to occur as the “cross-over” areas where both the Overlay and identified ONF/ONL/SAL are present.

¹³ This review has not considered provisions relating to all values, but an assumption is made that these are managed within the District Plan, as anticipated by PC33.

¹⁴ Plan Change 33 Section 32 report, para 2.1.

- 5.9 There will be a range of landscape values present in parts of the Overlay not identified as ONF/ONL or SAL. These values are not grouped together sufficiently in one area to meet the RPS tests.

6.0 CONTINUED VALUE OF THE OVERLAY

- 6.1 Large parts of the ridgelines and hilltops inside the Overlay may not meet the tests for classification as ONFL or SAL, but they do contribute to a district-wide landscape “framework” and spatially guide development. In that regard, the Overlay provides some protection to a “third-tier” landscapes across the district. These areas contribute to district-scale landscape character and identity in both rural and urban areas.
- 6.2 The value contributed by the Overlay appears to differ between rural areas to the west of the Outer Town Belt, and more urban areas to the east.
- 6.3 In urban parts of the district, the Overlay provides containment and “breathing space” between areas of development, to create a coherent landscape framework across the district. This serves to build up a district-scale natural and urban landscape character marked by distinct areas of urban development that is contained and distinguished by the most highly-elevated, less developed, surrounding landforms. This character is key to Wellington’s urban landscape ‘identity’.
- 6.4 The Overlay’s “landscape framework” also serves to promote best practice urban design principles, as sought by the district’s Urban Growth Plan.¹⁵ The Urban Growth Plan aims to build a compact, walkable city, supported by an efficient transport network, and “set in nature.”¹⁶
- 6.5 The Overlay has further relevance in parts of the district where elevated landforms do not include ONFs, ONLs or SALs. In these areas, visual amenity values of the surrounding relatively undeveloped ridgelines and hilltops are managed through the Overlay provisions.
- 6.6 Management of urban creep along the edges of the outer suburbs is also likely to be better served by the Overlay than SAL and ONFL provisions. Tawa/Linden provides an example of an area without ONFL or SAL identified in its surrounding ridgetops and hilltops, and is an area identified as a (draft) priority area for intensification.¹⁷

¹⁵ Wellington Urban Growth Plan 2014 – 2043 (WCC, adopted 2015). The plan seeks to keep Wellington compact and walkable, and to minimise the need for new infrastructure. Key outcomes sought are set out on pgs. 9-10.

¹⁶ Wellington Urban Growth Plan 2014 – 2043 (WCC, adopted 2015); pg 10.

¹⁷ Ongoing work being undertaken for WCC by Beca and Studio Pacific Architecture.

- 6.7 West of the Outer Town Belt the Overlay contributes to both natural and continued rural character with remnant and regenerating areas of vegetation and prominent landforms contributing to visual amenity. The character and amenity of these areas are important for the contrast they provide to more urban parts of the district, as the outer landscape framework for the 'urban belt'.
- 6.8 More remote, rural parts of the Overlay may not be seen frequently, or by large numbers of people at one time. However, these parts of the Overlay are likely to be viewed by people seeking out recreation or tourism experiences, in views from other elevated parts of the district (for example, in mountain biking or walking on the district's ridgetop/hilltop tracks). The contribution the Overlay makes to district-scale character is likely to be more apparent in these views, where there will be outlook over large parts of the district from a single viewpoint. At the district wide scale of the Overlay assessment, the more remote rural ridgelines and hilltops contribute to the overall landscape framework for Wellington. They make a significant contribution to the character of the district and its landscape identity. Removal of parts of this framework based on numbers of viewers, or individual viewpoints, would undermine the overall intent of the Overlay, to recognise a wider range of landscape character and identity values.
- 6.9 In both rural and urban areas, the landform "continuum" of the Overlay is central to its success in providing a visible landscape framework.
- 6.10 The Overlay "continuum" also "stitches together" the higher value ONFs, ONLs and SALs across the district, providing potential for a highly connected open space network and ecological corridors between high value SNA areas.
- 6.11 While draft SNAs in themselves are relatively connected in some areas, in other parts of the district they are more distinct from each other – but are generally connected by the Overlay (refer to **Map 3** in **Appendix A** to this report).
- 6.12 The 2001 ridgetop and hilltop study recognised the potential of the Overlay for "connectedness" across the Wellington's elevated, undeveloped ridgetops and hilltops. With regards to recreation values the study noted that the tops of ridges, hills and side spurs provide ideal recreational environments, because they are generally a more even gradient than the flanks and enable people to enjoy commanding views; and that public submissions on the Proposed District Plan specifically mentioned open space and views in the context of ridgetop and hilltop recreation.
- 6.13 While the introduction of provisions for higher-value landscape areas will manage effects in those areas, and effects on areas currently covered by the Overlay could, in principle, be managed

through the underlying zone, there will be value in maintaining the Overlay as a continuous landscape framework across the district. This will provide for a “whole of landform” approach to consideration of effects, with greater ability to manage against any gradual erosion of values from development on individual properties. (If management of ridgeline and hilltop values through the underlying zone is the preferred option, a further, more detailed review would be recommended to ensure that provisions are sufficient.)

- 6.14 Continued inclusion of the Overlay as a landscape “continuum” will also avoid the more complicated “patch-work” of ridgelines and hilltops with visual amenity value, identified as potentially problematic/complex by PC33. (Further comment on methods to manage adverse effects on the identified ridgelines and hilltops is provided in the section **District Plan Provisions**, further into this report).

Overlay as an “Other Landscape” under the RPS

- 6.15 In addition to ONFs, ONLs and SALs, the Wellington RPS refers to a third category of landscape - “all other landscapes”.¹⁸ These are described by the RPS as “landscapes that contribute to the amenity and character of the region and are managed through the general amenity provisions in local authority plans.” Impacts on these landscapes are not considered to be regionally significant.
- 6.16 While ‘all other landscapes’ are not required to be identified under the RPS, the definition helps to differentiate these landscapes from SALs.
- 6.17 The Overlay appears to provide such an “other” landscape, contributing to the overall amenity and landscape character of Wellington.

7.0 URBAN GROWTH

Existing Growth Overlay

- 7.1 Council has identified several areas across the district as suitable for growth, and these are provided for within the current planning framework. These include the following areas, covered (to varying degrees) by the Overlay:

¹⁸ Wellington RPS 3.7 Landscape

- Greenfield areas at Stebbings Valley (north of Churton Park), and Lincolnshire Farm (north of Grenada Village and Woodridge – zoned as Urban Development Area in the District Plan);
- Several rural areas east of the Outer Town Belt close to existing urban development - mapped in Appendices 4-6 of Rural Chapter 15: these are considered suitable for rural-residential development (some are substantially covered by the Overlay);
- Small parts of the Outer Residential Zone, at the edge of the Overlay. A number of these areas are mapped in Residential Appendices to the Plan. The District Plan accepts that these areas are suitable for residential development.

7.2 These areas are shown in **Map 3 in Appendix A: Graphic Attachment**. (Comment on District Plan provisions applying to these various areas is provided further into this report, under the heading **District Plan Provisions**).

Consented Development inside the Overlay

- 7.3 The District Plan provides for subdivision and development inside the Overlay, with adverse effects on visual amenity values managed through rules and assessment criteria aimed at siting development sensitively.
- 7.4 Consented development is particularly concentrated in the northern/north-eastern areas of the district, particularly east of Tawa and at Horokiwi. Development is also starting to occur inside the Overlay north-east of Woodridge and east of Newlands (on the top of the escarpment above State Highway 2 between Ngauranga and Petone); and there is some development interest from existing landowners starting to occur at Long Gully.
- 7.5 Development east of Tawa/Linden is outside those areas specifically identified and mapped in the District Plan as suitable for rural-residential development in Rural Chapter 15 Appendices (although still provided for by the Plan).
- 7.6 In the south and south-west of the district the Overlay appears to be currently largely undeveloped.
- 7.7 Desk-top analysis of development inside the Overlay in northern/north-eastern areas has suggested, that for the most part, development is positioned below most prominent ridgelines, to avoid impacts on skyline values, with effects on slopes in the Overlay reduced through use of

larger lots.¹⁹ Development does appear to have mostly avoided (or is less intensive in) those parts most highly visible (identified as High Visibility within District).

- 7.8 This has been confirmed by a visit to the area, although it is noted that the visual effects of development will differ depending on the viewpoint – there may appear to be greater impacts on ridgelines in closer, less-elevated views (for example in views towards development east of Tawa/Linden from State Highway 1), than from other more distant and elevated viewpoints (for example, from a dwelling on elevated slopes on the opposite side of the valley).
- 7.9 It does seem that the development pattern emerging on lower slopes of the Overlay (east of Tawa) is like that emerging on those more elevated parts identified as having High Visibility within Communities. PC33 appeared to provide for variable permissibility inside the Overlay²⁰, influenced by likely visual impact (with assessment against district-visibility/community visibility), but the extent to which this is occurring is not clear.
- 7.10 Lower slopes of the Overlay do appear to provide a “buffer” to the ridgelines. They provide for a degree of flexibility where development can be appropriately sited inside the Overlay, while limiting adverse effects on ridgeline and skyline values.

Example of adverse effects from development

- 7.11 One area has been identified (Trafford Terrace, Churton Park) which shows markedly different development patterning to the rest of the Overlay – with extensive residential-scale lots over a ridgetop in an area shown as High Visibility within Communities. In this area provisions have not been successful in managing adverse visual effects.
- 7.12 This ridgetop development appears in stark contrast to vegetated slopes immediately adjacent/below. Although other parts of Wellington City include development on ridgelines, where this continues across the slopes of a landform below the ridge, and is well-integrated into vegetation and landform, adverse effects on visual amenity are much reduced, and the result is a character which “fits” with that recognised as being “typical” for Wellington.
- 7.13 This ridge provides an interesting case to point to, in terms of more intensive patterning and the effects of development on elevated and steep ridgelines and hilltops, and may be particularly relevant for parts of the Overlay currently zoned Residential, where Council accepts that residential development can occur.

¹⁹ Part A of this review considered the extent of consented development inside the Overlay, and whether provisions had been successful in managing effects as anticipated. Initial findings were provided to Council in a Memorandum dated 3 February 2020.

²⁰ PC33 Section 32 Report, Page 7.

Further case studies

- 7.14 Further, more in-depth analysis of the Overlay could be useful at Horokiwi, and at Long Gully.
- 7.15 A sizable part of the zoned Urban Development Area at Horokiwi is covered by the Overlay, which could result in pressures on Overlay values as this area develops. Examination of how provisions will provide for this area is recommended.
- 7.16 Development interest from existing landowners is also occurring at Long Gully. This area could provide a useful case study for consideration of effects from greater use of variable permissibility²¹ inside the Overlay.
- 7.17 The further work could also review the boundary of the Overlay in these areas, noting that technology and methodology has advanced since the Overlay was defined.

Recent Growth Planning Work

- 7.18 Recent work completed for Council by The Property Group (TPG)²² has identified 22 areas across the district as suitable for further investigation for potential development. Some of the areas identified for rural-residential development in Appendices 4-6 of Rural Chapter 15 are included. (The brief for the study was to identify areas for possible re-zoning to Residential).
- 7.19 Large parts of the 22 areas identified by TPG are covered by the Overlay.
- 7.20 Council has now indicated that it is not intending to substantially re-zone areas of the Overlay to Residential. However, it could be that the recent work has identified some areas which could be similar to those mapped in Appendices 4 – 6 of the Rural Chapter 15 – recognised as being particularly suitable for rural-residential development.
- 7.21 IGL recommends that a further “filter” be applied to the areas identified by TPG, based on slope (steepness), presence of SNAs and parks/reserves, to refine areas for possible further consideration. Servicing and transport constraints would be other relevant filters in line with urban growth strategies.
- 7.22 Work is also ongoing to identify and prioritise outer suburbs for intensification. Some small parts of the Outer Residential zone being considered by this work are covered by the Overlay.
- 7.23 There will be questions on suitability of/management of effects from residential intensification in those elevated and more visually prominent parts of the Outer Residential zone, covered by the

²¹ As outlined in PC33, Section 32 report, page 7.

²² Wellington City District Plan Rural Land Study – Areas for Possible Re-zoning – Residential; The Property Group, 2019.

Overlay. In these areas there appear to be some existing difficulties around management of visual effects from the inclusion of residential scale development with Overlay values (with provisions appearing complex). Intensification would be likely to compound those complications (refer below, to commentary on **District Plan Provisions**).

8.0 DISTRICT PLAN PROVISIONS

Existing Provisions

- 8.1 For the most part the underlying zone of the Overlay is Rural, although there are also areas zoned Open Space, and small areas zoned Outer Residential. Provisions managing the effects of subdivision, buildings and structures in the Overlay are contained in the chapters relating to the underlying zones. Specific provisions relating to earthworks in the Overlay are contained in Chapter 30 Earthworks.
- 8.2 In considering Overlay provisions this review has placed most scrutiny on those relating to the Rural and Residential zones, as these are the areas where threats to values from development are likely to be greatest.
- 8.3 In general, provisions relating to the Overlay in the Rural and Residential zones appear complicated. While the District Plan attempts to set up a hierarchy for the level of effects deemed acceptable within the Overlay and outside it, it is not clear to what extent provisions achieve that desired hierarchy.
- 8.4 Provisions raise the following questions:
- With regards to rural areas, it is unclear what extra protection is afforded to the Overlay, beyond provisions applying to the Rural zone generally, as assessment against the Rural Design Guide applies to development across the extent of the Rural zone²³, and extra provisions relating to development inside the Overlay appear to address matters already covered in the Rural Design Guide;
 - It appears that some parts of the Overlay may be subject to less scrutiny than the Rural zone generally – which raises a question on the hierarchy of provisions for management

²³ In its Rural Chapters Council is seeking for all subdivision and development of new dwellings in to be sensitively located and designed to respect the existing rural character, and to ensure that existing amenities will not be compromised. Resource consents are required for all subdivisions and most residential buildings in the Rural zone (Outside Makara Village, Makara Beach settlement, and the Overlay. Refer to R15.3.3a). Council states that it will be seeking a high standard of design through the assessment of proposals (as restricted and unrestricted discretionary activities) against the Rural Area Design Guide. Refer to the explanation for Policy 14.2.2.1, Wellington District Plan.

of effects. This relates to parts of the Overlay identified in Appendices 4 – 6 of the Rural Chapter 15, which map identified rural areas close to existing urban development, where Council considers that rural-residential development will be appropriate. Provisions appear to provide that assessment of discretionary activities against standards and the rural guide will be on a “case-by-case” basis in these areas, compared to “in all cases” in the general Rural zone.²⁴ While matters related to rural amenity will be less of an issue in these predominantly urban areas, the Overlay still contributes to the urban landscape character (and Wellington identity) in these areas, through its surrounding, relatively undeveloped, ridgelines and hilltops. While the Overlay may serve a slightly different role in these areas, its value is not necessarily lower than in rural areas (and therefore deserving of less regard);

- The Plan implies that there could be variable permissibility across the Overlay, influenced by likely visual impact (and this is referred to in the PC33 Section 32 report²⁵), with provisions referring to assessment against district-wide, community wide, and neighbouring views.²⁶ The extent to which this is occurring is unclear and would require a further ‘visual impact audit’ (although it does appear that development patterning inside the Overlay is protecting district-wide ridgeline values, but with little discernible difference in patterning across hilltops below those main ridgelines);
- Within parts of the Overlay covered by the Outer Residential zone, while residential development is seen as appropriate with design measures incorporated to manage effects, it is not easy to understand how provisions differ to provide for this, from other parts of the Overlay.

8.5 As part of this review discussions were held with Council’s consenting team, and several questions were raised by officers:

- There is a question on the extent to which provisions recognise different values across the Overlay, with some parts of the Overlay seen by consenting officers as possibly holding higher values than other parts. Parts of the Overlay in more urban contexts were

²⁴ The explanation for R15.4.5 states that in all cases the design and layout of all rural subdivision and including the proposed location of residential building sites, will be assessed against the criteria of the Rural Area Design Guide and relevant Overlay provisions. However, Objective 14.2.1, which relates to subdivision and development in rural areas east of the Outer Town Belt (inside areas identified in Appendices 4-6 of Chapter 15 as suitable for rural residential development), sets out that assessment against the Rural Area Design Guide will need to be made on a case by case basis. Large parts of these areas are covered by the Overlay.

²⁵ Refer to page 7.

²⁶ For example, District Plan R15.4.2.2.

seen as differing from those in more remote areas. A comment was made that provisions applied a “one size fits all” approach to development inside the Overlay;

- While values relating to different parts of the Overlay are shown on Maps 56 – 61 of the District Plan, it was unclear whether these Maps are being used by all consenting officers, or if the Maps provide enough information on values (although it is noted that the intention of PC33 was that Overlay values other than visual ones should be managed by other relevant parts of the Plan);
- There was a comment from officers that provisions may not include sufficient controls on proposals for new infrastructure within the Overlay.

Overlay Provisions in relation to ONFs/ONLs/SALs

8.6 With incorporation into the District Plan of ONFs, ONLs and SALs, there will need to be an appropriate hierarchy of provisions between the Overlay and higher-value landscape areas, with regards to permissibility of adverse effects.

8.7 Removal of parts of the Overlay covered by higher-value landscape areas is not recommended. The Overlay should be retained as currently identified, to recognise the importance of its visual continuity over landforms, with provisions relating to ONFs, ONLs or SALs simply “trumping” any Overlay provisions, where they apply.

8.8 Other possible methods to simplify and clarify hierarchy between landscape areas could be:

- Simplification of Overlay provisions in relation to assessment against Design Guides. Assessment against the relevant Design Guide may be enough, without the need for further similar (or the same) provisions being listed in the Plan chapters;
- Clarification on when landscape expertise is required/could be appropriate (for example, this might be appropriate to determine the effects from a discretionary proposal on ONF/ONL or SAL areas and not Ridgelines and Hilltops Overlay);
- Use of variable permissibility inside the Overlay, related to visibility rather than officer discretion – less scrutiny on parts of the Overlay outside those identified as High Visibility within the district or High Visibility within Community, could be appropriate. (As indicated earlier, this was implied in PC33, which introduced the Overlay).

9.0 CONCLUSIONS AND RECOMMENDATIONS

9.1 Based on the analysis in this report, the following conclusions have been reached:

- The Ridgelines and Hilltops Overlay boundary has been defined based on visibility, slope angle, and landform continuity, with provisions adopted with the purpose of managing adverse visual amenity effects on prominent ridgelines and hilltops across the district (to address consistent concerns raised by Wellington communities on the effects of development);
- These areas also capture a range of other landscape values, with an approach to manage these through other parts of the district plan;
- The Overlay differs from identified Outstanding Natural Landscape and Features (ONFs/ONLs) and Special Amenity Landscapes (SALs), as these have been identified based on the range of values (natural science, sensory and shared and recognised) exhibited in a defined area, at a level which meets the tests in the Wellington Regional Policy Statement. These areas may not be elevated, highly visible, or connected to each other;
- The Overlay recognises a “third-tier” of landscapes across the district, relative to ONFs, ONLs and SALs. Such landscapes are provided for in the Wellington Regional Policy Statement as “landscapes that contribute to the amenity and character of the region, managed through the general amenity provisions in local authority plans”;
- There is value in continued inclusion of the Overlay in the District Plan, in addition to recently identified ONF, ONL and SAL areas. The Overlay provides a visually continuous landscape framework for the district, to guide development. It contributes to the recognised urban landscape character and identity of Wellington as a whole (without needing to be visible in its entirety, from all viewpoints, at any one time). It promotes good urban design principles and achievement of urban growth planning objectives related to compact urban form, linked to existing infrastructure and transport planning. Its inclusion, without an ‘overlap edit’ to remove areas covered by ONFL and SAL, provides a basis for consideration of effects on a landform “continuum” that provides visual continuity and cohesiveness across the district;
- The Overlay provides value in different ways to its urban and rural contexts. In rural areas west of the Outer Town Belt, the Overlay serves to maintain a strong natural or open character and amenity, with development managed in highly visible areas. In areas

east of the Outer Town Belt, the Overlay contributes to Wellington’s recognised urban landscape character (compact urban form enclosed within highly-elevated, relatively undeveloped ridges and hilltops), and contributes to the visual amenity of urban areas by providing visual and physical breaks from more intensive development;

- While the visual effects of development could in principle be managed through provisions for the underlying zone (and the relevant Design Guide), retention of the Overlay as a landscape “framework” will provide for continued recognition of values associated with more elevated areas, and effects of development on these; and will recognise the importance of the landform and visual continuity of these elevated, relatively undeveloped landscapes;
- Retention of the Overlay will provide for a connected open space network across the district and ecological corridors between Significant Natural Areas (SNAs).

Recommendations

9.2 The following recommendations are made:

- It is recommended that the Overlay be retained in the District Plan;
- Work is recommended to simplify provisions relating to the Overlay, and to ensure that an appropriate hierarchy (in terms of permissibility of effects) is achieved between its parts, and in relation to recently identified ONFs, ONLs and SALs; as well as in relation to other more general landscape areas outside the Overlay;
- Further consideration could be given to adjusting the boundary of the Overlay in some areas – particularly in small parts covered by the Outer Residential zone (for example, where values are compromised, and adjustment would still provide for protection of Overlay values “on the whole”). A landform approach would be recommended for any boundary adjustment (rather than an adjustment to cadastral boundaries);
- That a further “filter” be applied to the areas identified by TPG in recent growth planning work, based on slope (steepness) and presence of SNAs and/or parks/reserves - to refine areas for possible further consideration;
- That council consider undertaking further case-study work in particular parts of the Overlay (Horokiwi and Long Gully) where there is development interest and overlap with Urban Development planning This would consider how provisions will provide for

development in the Urban Development Area at Horokiwi; use case study areas to consider the effects of using variable permissibility within the consenting process – linked to more detailed, proposal specific landscape and visual amenity assessment rather than officer discretion; and confirm the continued appropriateness (or otherwise) of the Overlay boundary in these areas.

Isthmus

March 2020

Appendix A: WCC Ridgelines and Hilltops Overlay Initial Review

Isthmus.

8 April 2020

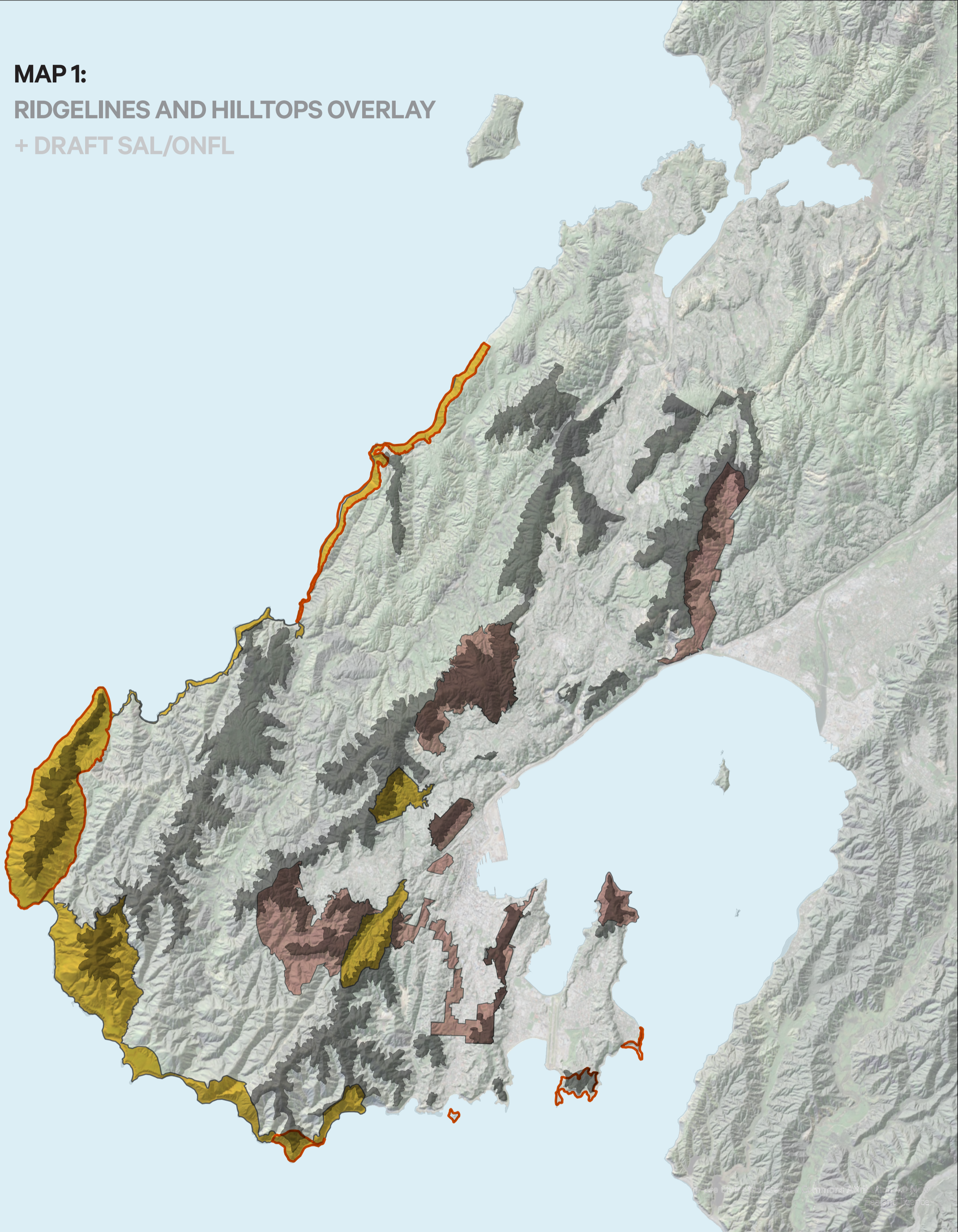


Land.
People.
Culture.
Isthmus.

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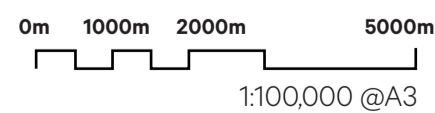
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| MAP 2: RIDGELINES AND HILLTOPS OVERLAY + DRAFT SNA | 4 |
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| MAP 3: RIDGELINES AND HILLTOPS OVERLAY + FUTURE URBAN GROWTH | 5 |

MAP 1: RIDGELINES AND HILLTOPS OVERLAY + DRAFT SAL/ONFL

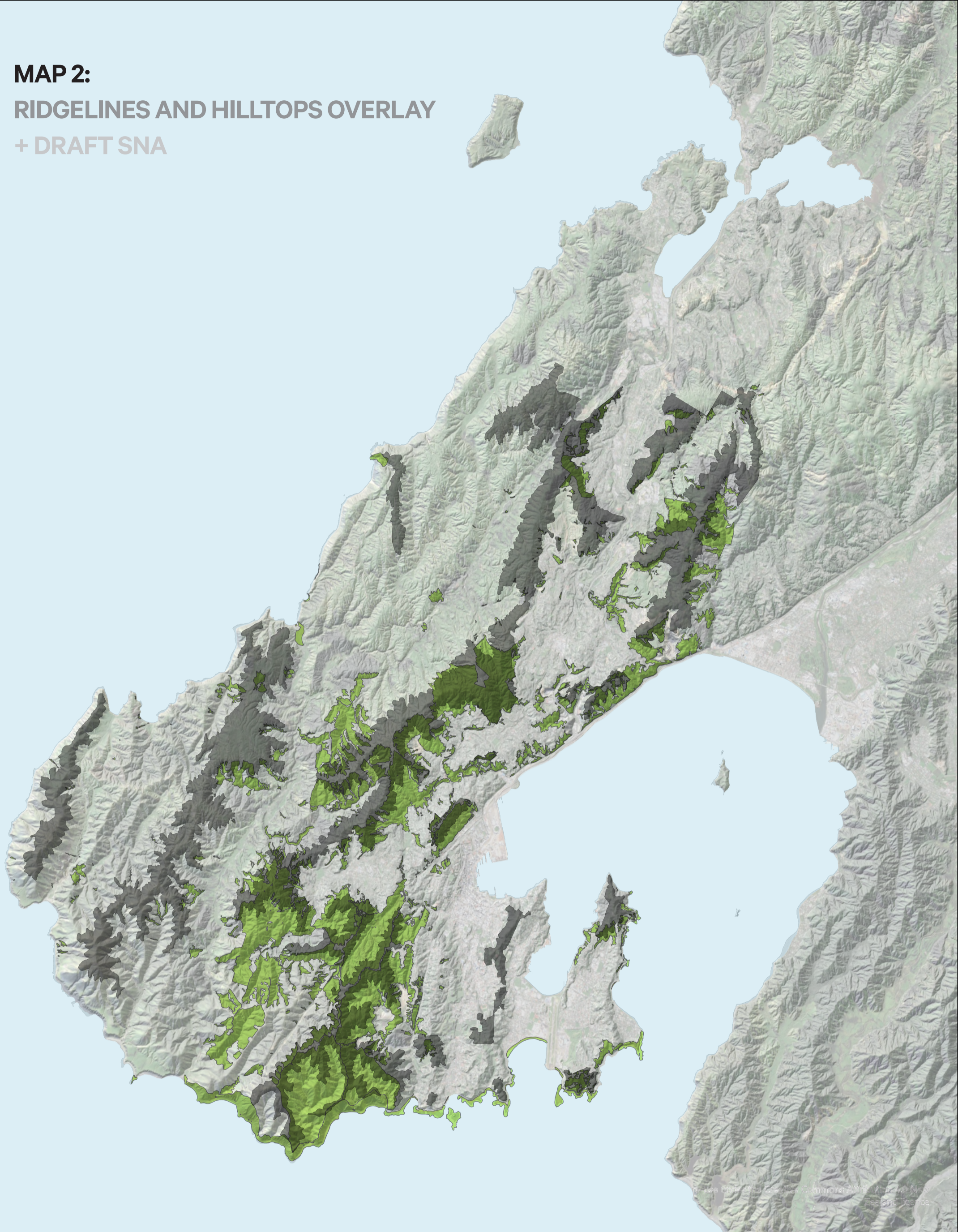


Legend.



| | |
|---|-------------------------------|
|  | Draft ONL |
|  | Draft SAL |
|  | Draft ONF |
|  | Ridgelines + Hilltops Overlay |

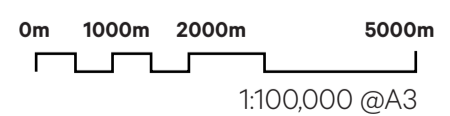


MAP 2: RIDGELINES AND HILLTOPS OVERLAY + DRAFT SNA

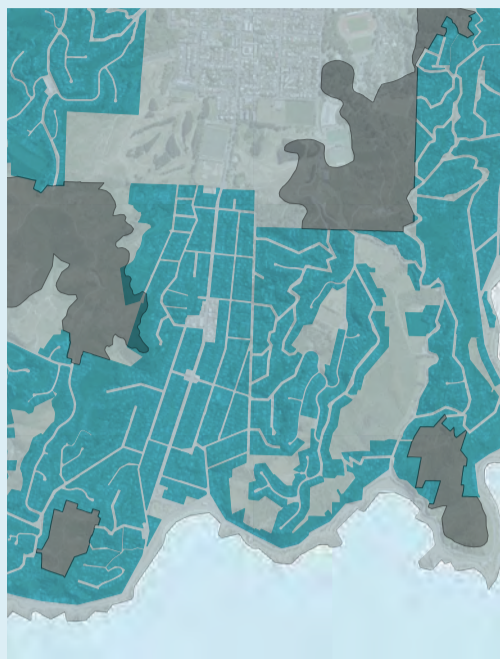


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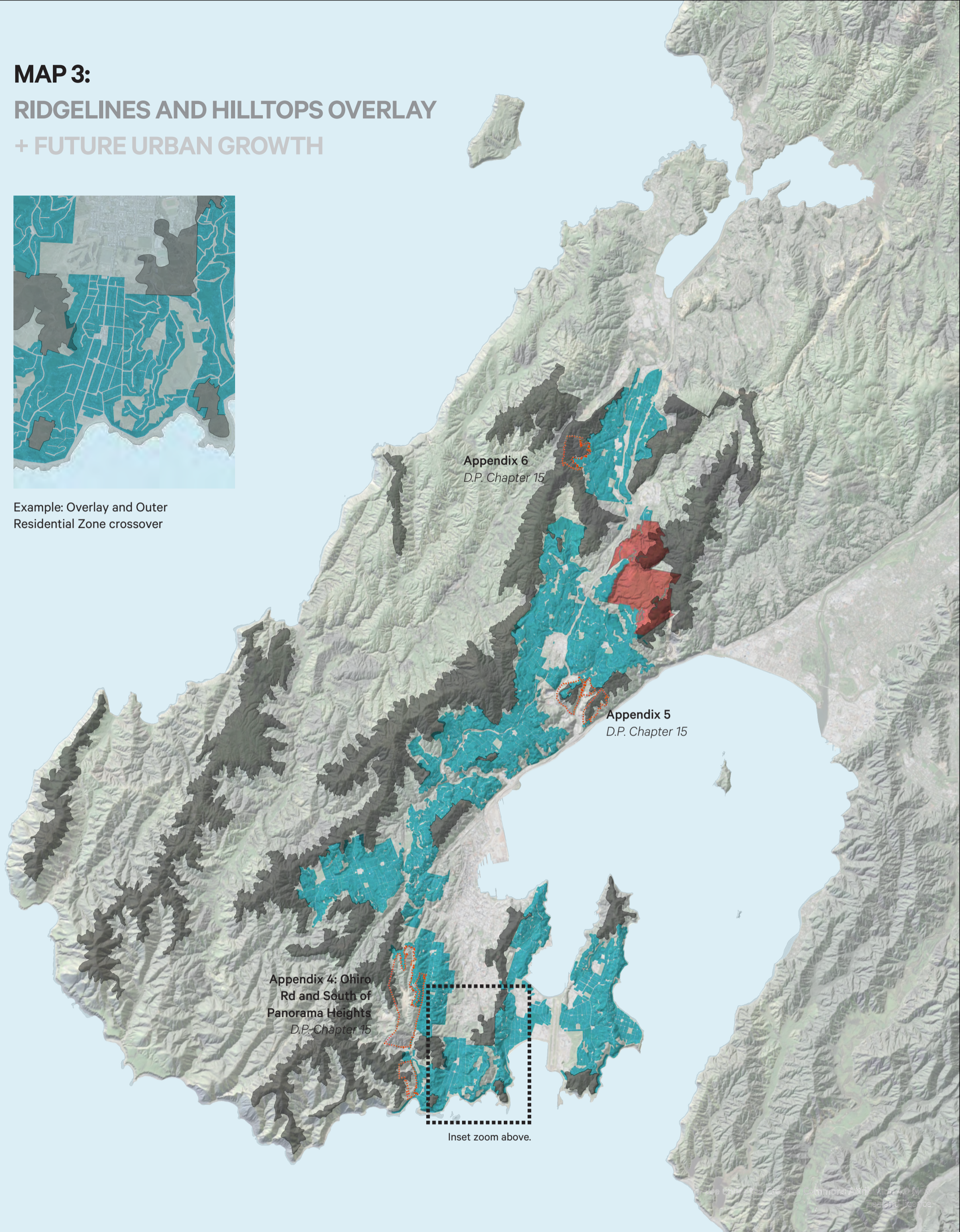
| | |
|---|-------------------------------|
|  | Potential SNA |
|  | Ridgelines + Hilltops Overlay |



MAP 3: RIDGELINES AND HILLTOPS OVERLAY + FUTURE URBAN GROWTH



Example: Overlay and Outer Residential Zone crossover



| Legend. | |
|---------|---|
| | Urban Development Zone |
| | Outer Residential Zone |
| | District Plan Chapter 15, Appendices 4-6 (Rural Residential Growth) |
| | Ridgelines + Hilltops Overlay |

