

***Summary of Submissions
Proposed District
Plan Change 46 -***

**Subdivision Design
Guide Review**

Proposed District Plan Change 46

Subdivision Design Guide

Summary of Submissions

Submission Number	Name	Address for Service	Wishes to be heard
1	The Architectural Centre Inc	PO Box 24178 Wellington Attn: Christine McCarthy	Not Specified

Submitter supports the improvements made to the Design Guide, but also queries whether all or some of the material included should be incorporated into the District Plan as rules to raise the level of subdivision development – much of which does not address or engage with the key issues outlined in the Design Guideline.

Also wishes to iterate that subdivisions can be created without side yards and front yards if housing is well designed. Additionally, the submitter urges Council to disallow Greenfield site development while there are valid options for intensification and available brownfield sites – and stresses the necessity for situating new subdivisions near sources of public transport.

Decision Requested:

To approve the proposed plan change with consideration given to above comments.

2	Hendrika I Walshe	42 Hall Street Newtown Wellington	Yes
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Submitter makes a number of requests for Council to raise environmental awareness & to promote sustainability. Additionally, makes reference to the need for bike paths/lanes to accommodate for slower forms of transportation.

Decision Requested:

That the plan change be modified as follows:

- amend G2.1 to include cycleways as an alternative to vehicle traffic;
- amend G3.1 (2nd paragraph) to read “Designed elements such as ~~avenues~~ groves of trees...” to support and reintroduce distinctive local vegetation;
- add ‘stands of trees’ as another contributing factor to sense of place under G3.3;
- amend G3.4 to include cycle paths and groves of trees to enhance streetscape and amenity;
- add statement to G3.5 to suggest lining major routes with groves of trees;
- amend O4.1 to read, “maintain, enhance, and add to the distinctive...”
- add statement in O4.2 to remedy ‘earth damaging’ activities (street lights, roads, traffic volume, high energy usage) by implementing ‘earth repair’ activities (tree planting, lower energy use, etc...);
- amend G4.1 to include a statement ensuring “sites are planted with vegetation native to Wellington is such a way as to adequately support heritage trees;”
- add statement in G4.2 to allow for the conservation of soil structure for individual plots;
- amend G4.3 to read, “ and protect aquatic...vegetation, or improve to former natural state;”
- amend G4.6 to read, “ Retain, integrate, and create more areas of...”
- add further objective to Section 5 (Public Space Design) to achieve environmental sustainability through offsetting ‘earth damaging’ activities with ‘earth healing’ activities (i.e. tree planting to offset road construction and high

automobile use);

- amend G5.1 to utilise groves of trees in lieu of street trees in order to better enhance the sense of place & natural environment for wildlife, and to mitigate adverse effects such as runoff;
- amend G5.2 to read, "Express...hierarchy with larger groves for more frequently-used roads..." – and further, to leave the groves open for planned views to enhance visual amenity;
- amend G5.3 to read, " Provide...pedestrian and separate cycle access..."
- add statement to G5.7 to ensure 1/3 of adjoining properties share a common grove of trees to enhance sense of community, manage stormwater effects, etc...
- site groves of trees as positive mitigating features for stormwater discharge and runoff under G5.8;
- add statement in Application section to promote the application of cycleways and tree groves for all subdivision; and
- add statement in Intention section to promote sustainability by assessing earth damaging activities and offsetting them with earth healing activities.

3	Transpower NZ Ltd	C/- Burton Planning Consultants Ltd Attn: Yana Bosseva PO Box 33-817 Takapuna Auckland	Yes
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Submitter states that the interface between the National Grid and subdivision needs to be properly managed to ensure that minimum safe separation distances are maintained for public safety and the security of electricity supply. The Subdivision Design Guide is an opportunity to address such issues early. In order to ensure good amenity outcomes for the Wellington District, and promote good practice.

Where developments are proposed near high voltage transmission lines, the following two aspects need to be considered:

- Adverse effects of the National Grid;
- Adverse effects of others' activities on the National Grid;

It is important that subdivisions are designed to comply with NZ regulations, in terms of location of buildings and structures, earthworks and landscaping, as well as the operation of mobile plant during construction.

Decision Requested:

That the Design Guide be amended to include the following:

- a) Insert a new paragraph after paragraph 4 of the Guild's Introductions, as follows:

In the case where land subject to subdivision and development proposals is located near, or traversed by, high voltage electricity transmission lines, please refer to Appendix 2 of this Guild, which contains guidelines on acceptable location and design.

- b) Insert a new Appendix 2 – Subdivision near High Voltage Transmission Lines, as follows:

APPENDIX 2 – SUBDIVISION NEAR HIGH VOLTAGE TRANSMISSION LINES

High voltage transmission lines traverse a number of zones in the Wellington District. In accordance with the Mandatory New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001), there are minimum safe separation distances that need to be maintained from these lines, for buildings, structures, earthworks and mobile plant operation. Additionally, in accordance with the Electricity (Hazards from Trees) Regulations 2003, vegetation needs to be located away from transmission lines, to ensure it does not interfere with these lines and cause a hazard.

The maintenance of safe separation distances from high voltage transmission lines is vital in ensuring the security of the National Grid and continued electricity supply, and in maintaining public safety. Transpower New Zealand Ltd should be consulted to provide details on the separation distance requirements in each Particular situation.

Objectives

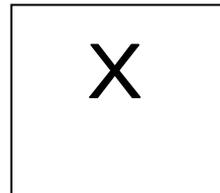
- A2.01 To maintain safe separation distances from high voltage transmission lines, for buildings, structures, earthworks activities, mobile plant operation, and vegetation planting and to ensure access to support structures is maintained.
- A2.02 To minimise adverse effects of the interface between high voltage transmission lines and proposed Developments on amenities.

Guidelines

- A2.G1 Design structure plants and subdivisions by ensuring that high voltage transmission lines are sufficiently protected and that public safety is maintained.

The design stage of subdivisions, including structure plans, is the time to think about the location of any Transmission lines (and support structures) traversing the land subject to development proposals. The requirements for minimum safe separation distances for buildings, structures and landscaping should be incorporated into the design, to ensure public safety and the protection of the National Grid. Additionally, access around transmission line support structures must be maintained, to ensure that Transpower can carry out maintenance and emergency works unfettered.

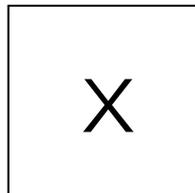
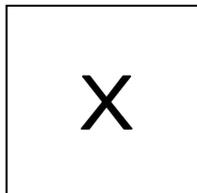
Insert picture from example 2 on page 26 of Transpower's design guide



- A2.G2 Ensure earthworks and mobile plant maintain adequate separation distances from transmission line conductors and support structures.

NZEC 34:2001's requirement for earthworks to be kept a certain distance away from transmission line support structures (and the security of the National Grid and electricity supply) is maintained. Refer to the NZEC 34:200, or contact Transpower New Zealand for details on the exact distances required.

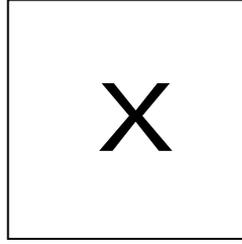
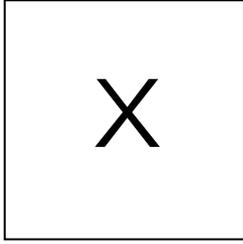
Additionally, the NZEC 34:2001 requires that 4-metre minimum safe separation distance be maintained between transmission line conductors, and mobile plant. The breach of this safety buffer may lead to mobile plant becoming live, which is extremely dangerous.



Insert pictures on pages 17 and 29 of Transpower's design guide.

- A2.G3 Locate and orientate dwellings, and landscape planting, to ensure that the adverse effects of any high voltage transmission lines present are minimised.

Planting should be kept away from transmission line support structures and conductors, but can be planted near dwellings to ensure that the transmission lines are screened and out of view from the dwellings and/or outdoor living areas.



Insert pictures on pages 6 and 7 of Transpower's design guide.

4	Pauatahanui Inlet Community Trust	George McMillan Convenor, Catchment Issues Group 17 Samwell Drive Porirua	No
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The submitter strongly supports the objectives set out in O4.1 and O4.2, and the guidelines in G4.3, G4.4, and G5.8. The Trust's concerns primarily tie around the adequacy of measures to control construction runoff and on-going stormwater discharge.

Decision Requested:

- That there be no question of moving away from the stated Objectives or from the guidelines to achieve these as set out in the proposed Plan Change; and
- that there is a need for close liaison between the Council and Greater Wellington regional Council both in relation to Consent investigation and subsequent monitoring of Consent conditions; and
- that Council retain O4.1, O4.2, G4.3, G4.4, and G5.8 as currently written.

5	Ohiro Properties Ltd	C/- MWH (NZ) Ltd PO Box 9642 Wellington	Yes
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Submitter believes that the blanket presumption against intensive development of sites with slopes greater than 30 degrees is inappropriate where land is close to the city centre and is able to be developed in a way that meets our guidelines – with particular regard to comments on remnant bush & local vegetation.

Decision Requested:

That the Council:

- add the words “generally on” before “sites” in G4.1, and at the end of the 1st paragraph of explanation add the following sentence – “However, development on steep slopes is also part of the character of Wellington, and may be acceptable where there are no important landscape features and where runoff can be managed, geotechnical stability ensured, and satisfactory living environment achieved;”
- add to G4.2 at the end of the explanation: “where landform modifications are made to facilitate more intensive development, to achieve better connectivity, or for other reasons, cut faces should be concealed behind development, or finished to present as natural an appearance as practicable;” and
- Change the word “possible” to “practicable” in G4.5, and add a further sentence at the end of the explanation: “Where it is not practicable to protect existing bush, consider reinstating areas of bush of ecological variety and creating corridor effects using street planting and planting in parks and gardens.”

6	Housing New Zealand Corporation	c/- Tonkin and Taylor Ltd PO Box 2083 Wellington	No
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The submitter generally supports the proposed Plan Change as it reflects the principles and processes advocated by HNZN's own Urban Design Guide. In particular, HNZN supports the overall intent of the Subdivision Design Guide (as expressed on page 3 of the proposed plan change). Additionally, HNZN supports certain specific provisions and also calls for amendments to

<p>be made to other areas of the plan change.</p> <p>Decision Requested:</p> <ul style="list-style-type: none"> To provide further, more specific guidance as to the applicability of the SDG on smaller sites not considered 'significant'; To retain the O1-4 objectives as currently written; To retain Guidelines G1.1 - G1.9 wording as currently written; To retain Objective O2.1 wording as currently written; To retain Guidelines G2.1 – 2.3 wording as currently written; To retain Objectives O3.1 and 3.2 wording as currently written; To retain Guidelines G3.1 – G3.5 wording as currently written; To retain Objectives O4.1 and 4.2 wording as currently written; To retain guidelines G4.1 – 4.6 wording as currently written; To retain Objectives O5.1 and 5.2 wording as currently written; To Retain Guidelines G5.1-5.8 wording as currently written. 			
7	Trelissick Park/Ngaio Gorge Working group	24 Orari Street, Ngaio	Yes
<p>The Submitter makes the following points with respect to the proposal:</p> <ul style="list-style-type: none"> We support all references to protection of natural features and open spaces, including native bush, hillsides and ephemeral streams, although some of the text could be strengthened to ensure such protection actually takes place; Some of the wording of the guidelines is subjective which leaves doubt in our minds as to what will occur, who will make the decisions. There needs to be more teeth in the text to make some things mandatory. There should be reference to the policies outlined in WCC's "Wet and Wild" which are so relevant. The guide should apply to small 'infill' not just "significant..." Fish passages should be included in the section regarding streams Additional wording regarding storm water is needed, eg. minimising hard surfaces, effects on stream banks etc There is no reference to new native vegetation planting <p>Decision Requested:</p> <p>That the proposal be amended to include the encompass the suggestions raised above.</p>			
8	Woodridge Estate Ltd	c/- Ian Prentice Truebridge Callender Beach Ltd PO Box 12 142 Wellington 6032	Yes
<p>Overall, the submitter supports the revised subdivision design guide. However, the indicated approach to earthworks in relation to the retention of the landform is overly restricted and does not recognise building trends of the last 10 years.</p> <p>Woodridge disagrees that stepping and terracing should be avoided as stated in G4.2. It is a temporary change to the landform that allows for the easy construction of buildings with maximum outdoor usage and the easy maintenance of lots.</p> <p>Additionally, the submitter believes that G4.3 is unreasonable as it would be impossible to maintain all watercourses, particularly given the City and Regional Councils interpretation that any landform depression is an ephemeral watercourse.</p> <p>Decision Requested:</p> <p>That section 4 of the proposed subdivision design guide be re-written so as to recognise and accommodate the issues raised in this submission as being accepted subdivision and land development practice for greenfield subdivision in the Wellington area.</p>			
9	Lincolnshire Farm Ltd	c/- David Gibson Truebridge Callender Beach Ltd PO Box 12 142	Yes

		Wellington 6032	
<p>Overall, the submitter supports the revised subdivision design guide. However, the indicated approach to earthworks in relation to the retention of the landform is overly restricted and does not recognise building trends of the last 10 years.</p> <p>Lincolnshire disagrees that extensive earthworks should be avoided. It is a temporary change to the landform that allows for the easy construction of buildings with maximum outdoor usage and the easy maintenance of lots.</p> <p>Additionally, the submitter believes that G4.3 is unreasonable as it would be impossible to maintain all watercourses, particularly given the City and Regional Councils interpretation that any landform depression is an ephemeral watercourse.</p> <p>Decision Requested:</p> <p>That section 4 of the proposed subdivision design guide be re-written so as to recognise and accommodate the issues raised in this submission as being accepted subdivision and land development practice for greenfield subdivision in the Wellington area.</p>			
10	Truebridge Callender Beach Ltd	c/- Ian Prentice Truebridge Callender Beach Ltd PO Box 12 142 Wellington 6032	Yes
<p>Overall, the submitter supports the revised subdivision design guide. However, the indicated approach to earthworks in relation to the retention of the landform is overly restricted and does not recognise building trends of the last 10 years.</p> <p>TCB disagrees that stepping and terracing should be avoided as stated in G4.2. It is a temporary change to the landform that allows for the easy construction of buildings with maximum outdoor usage and the easy maintenance of lots.</p> <p>Additionally, the submitter believes that G4.3 is unreasonable as it would be impossible to maintain all watercourses, particularly given the City and Regional Councils interpretation that any landform depression is an ephemeral watercourse.</p> <p>Decision Requested:</p> <p>That section 4 of the proposed subdivision design guide be re-written so as to recognise and accommodate the issues raised in this submission as being accepted subdivision and land development practice for greenfield subdivision in the Wellington area.</p>			
11	Ngaio Progressive Association	c/- 199A Cockayne Road Ngaio Wellington 6035	Yes
<p>The submitter conditionally supports the proposal and the associated objectives and guidelines of each of the five sections. Additionally they seek that Plan change 46 should have been extended to cover small scale infill to ensure public and private amenity of suburban Wellington is not adversely affected or reduced.</p> <p>Decision Requested:</p> <ul style="list-style-type: none"> • That Council add new objectives and guidelines to cover small scale suburban infill; • That Council address road and parking standards in change 46 to address sustainable development of the wider community, cater for public transport and make reference to street widths; • That Council should cite that vegetation and trees should be of a scale appropriate to a residential areas, especially in infill situations. A balance should be struck between protecting and retaining existing mature trees and ensuring new planting of vegetation and trees is of a scale appropriate to a residential area; • To strengthen clause to cover protection of existing vegetation, especially the mature trees and areas of bush that give character to the suburb; • Add new clause to cover new planting of vegetation; • Refer to "Wet and Wild" policy in the overall design guide; and • Extend the intent of the design guide into rules within the District. 			
12	Wellington Conservancy	PO Box 5086	No

	Department of Conservation	181 Thorndon Quay Wellington	
<p>The submitter supports and opposes certain aspects of the plan change and requests that certain amendments be made.</p> <p>Decision Requested:</p> <ul style="list-style-type: none"> • That Objective O4.1 and guidelines G4.1 – 4.4 are approved for inclusion in the Subdivision Design Guide. • That the <u>Intention</u> of the Design Guide be amended to read: "To facilitate neighbourhoods that are liveable, sustainable (both socially and environmentally), well connected, safe, that have a strong sense of place and which respect existing landscape and natural features." • That Objective O4.2 is amended to read: "O4.2 To provide for the long term sustainability of ecosystems and habitats". • That Guideline G4.5 is amended to read: "G4.5 Protect remnant areas of native bush which have high ecological value, as priority". 			
13	Greater Wellington Regional Council	Ling Phang Greater Wellington Regional Council PO box 11646 Wellington	Yes
<p>Greater Wellington generally agrees with the provisions under section 2 (access and interconnections). However, section 2 should be more explicit about the need for street layouts to accommodate public transport services such as direct bus linkages through new subdivisions without the need to 'double back' and ensure most households will be within 500m of a public transport route wherever possible (ie. a walkable distance).</p> <p>Decision Requested:</p> <p>That the plan change be amended with the following:</p> <ul style="list-style-type: none"> • To include reference to 'public transport' in the Access and Interconnection section (draft wording supplied) • Guideline G2.1: to include the phrase "and more direct links to existing or proposed public transport services" at the end of the guideline (draft wording supplied). • Guideline G2.2: To provide reference to 'public transport services' within the guideline (draft wording supplied) and add the following sentence at the end of the explanatory text "Where practicable, new residential development should be located within 500m of a public transport route." 			
14	New Zealand Fire Service Commission	c/- Sean Grace Beca Carter Hollings and Ferner Ltd PO Box 3942 Wellington 6140	Yes
<p>The Submitter believes that future proposed subdivisions, as guided by the proposed Subdivision Design Guide, should take into account the operational and property requirements of the Fire Service Commission to adequately provide for fire-fighting activities within a subdivision in a safe, effective and efficient manner, as required by the Fire Service Act 1975.</p> <p>Decision Requested:</p> <p>To amend the design guide as outlined below (strike out text to be deleted, underlined text to be added):</p> <ul style="list-style-type: none"> • Objective O1.1: to provide convenient access to local neighbourhood services, and facilities, <u>and any emergency services.</u> • Guideline G1.1: Provide for service, retail, <u>emergency services</u> and community facilities at neighbourhood centres.... • Public space design objectives to have a third objective added, as follows: <u>O5.3 To provide adequate infrastructure to allow emergency services to respond in a timely manner to emergencies.</u> <p>Public space design guidelines to have a ninth guideline added, as follows: <u>G5.9 Provide sufficient water for fire fighting purposes within close proximity of every new habitable dwelling. To ensure the safety of the community in fire emergencies, the New Zealand Fire Service requires easy access to water supply. This is applicable whether the water is provided by way of hydrants connected to the local mains network supply, or by on-site storage. Refer to the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice for specific engineering criteria.</u></p>			