

**OFFICER'S REPORT FOR:** **Independent Hearings Commissioner:  
Robert Schofield**

**SUBJECT:** **Proposed District Plan Change 15 –  
Poto Road**

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Division, Hutt City Council**

**REPORT DATE:** **13 August 2010**

**DATE OF HEARING:** **24 August 2010**

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### **EXECUTIVE SUMMARY**

The purpose of Proposed Plan Change 15 is to zone a Hutt City Council (hereafter referred to as Council) owned parcel of land on Poto Road, Normandale as General Residential Activity Area in the City of Lower Hutt District Plan (referred to as the District Plan).

This Plan Change is the result of a review undertaken by Council looking at all the land it holds in fee simple throughout the City. The objective of this review is to ensure all Council owned land is being used for its best purpose. The site was included in the review as it was no longer required for the purpose it was acquired for (roading). As a result of this review and further assessments it is the intent of Council to declare the land surplus subject to the outcomes of this Plan Change.

Plan Change 15 was notified on 02 February 2010, with submissions closing on 05 March 2010. The summary of submissions was notified on 06 April 2010, with further submissions closing on 23 April 2010.

A total of 10 original submissions and 4 further submissions were received as well as a petition signed by 644 members of the local and wider community who oppose the disposal of the Proposed Plan Change site (attached to one of the submissions).

The submissions and further submissions seek various forms of relief, including but not limited to:

- Rezoning of the land as General Recreation Activity Area;
- Resolving all access and parking issues relating to the Normandale Playcentre.

A hearing of submissions received to Plan Change 15 is scheduled to be held on 24 August 2010.

The following report recommends that the Council accept or reject the submissions and further submissions for the reasons as outlined under section 5 of this report.

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## **1. INTRODUCTION**

This report discusses and makes recommendations on submissions received in relation to Plan Change 15 – Poto Road (hereafter referred to as the Plan Change).

The intention of Plan Change 15 is to rezone a Council owned parcel of land on Poto Road as General Residential Activity Area. The site is situated on the northern side of Poto Road at its intersection with Normandale Road. It is just over 4000m<sup>2</sup> in size and is made up of two parts, both parts now being fee simple titles owned by Council. One of the sites was classified as legal road until the road stopping procedures were completed in November 2009.

Although this report is intended as a stand-alone document, a more in-depth understanding of the Plan Change, the process undertaken, and related issues may be gained by reading the Section 32 Evaluation and associated Plan Change documents as publicly notified in August 2010.

## **2. BACKGROUND**

Since 2007 Council has been undertaking a review of all the land it holds in fee simple throughout the City. The objective is to ensure all Council owned land is being used for its best purpose. The review includes an assessment of the open space contribution each site is making to the community and city along with an assessment of the development potential of each site.

This site was included in the review as it was no longer required for the purpose it was acquired for - roading. The initial assessment deemed the land to have low open space/recreation potential and a further assessment of its development potential concluded it could be developed for residential purposes under the provisions of the District Plan for the General Residential Activity Area. Consultation under the Local Government Act followed.

It is the intent of Council to declare the land surplus (to be used for residential development) subject to the outcome of this proposed plan change process. In order for the land to be used for residential purposes it is first necessary to zone the land as part of the General Residential Activity Area.

Consultation with local groups and organisations, residents and others who may be affected by any decision to develop the land has been undertaken. This is in addition to the statutory processes required under the RMA. In addition, discussions have taken place with the Department of Conservation, in respect of the land to the north which is held by the Department as reserve. In addition, and because they were more affected than other adjoining owners the pre-school facility to the northeast were advised and separately consulted.

In accordance with the provisions in the Local Government Act for considering the disposal of park land formal consultation was carried out over the period 6 May 2008 to 18 June 2008. This included the following actions:

- Formal advertisement in the Hutt News of 6 May 2008 regarding possible disposal of park lands.

- Article on the proposals for possible disposal or part disposal of six properties was published in the Hutt Views on 6 May 2008.
- Letter and reports sent to 14 organisations (including resident associations) identified as having a possible interest in the proposals.
- Letter sent to adjoining land owners/tenants of land identified for possible disposal.
- Information posted on the Council's website.

In preparation of the Plan Change Council sought advice from a landscape and open space expert (Assessment of Open Space and Amenity by PAOS Ltd.). Experts advice has also been sought on the geotechnical suitability (Preliminary Geotechnical Suitability Assessment by Tonkin & Taylor Ltd.) and on the existing infrastructure in the area (Assessment of the impact of indicated subdivision on the existing services in Poto Road by GHD Ltd.). The assessments have been attached to the proposed plan change documents.

Plan Change 15 was notified on 02 February 2010, with submissions closing on 05 March 2010. The summary of submissions was notified on 06 April 2010, with further submissions closing on 23 April 2010.

A total of 10 original submissions and 4 further submissions were received with regard to the Plan Change. Furthermore one of the submissions had attached a petition signed by 644 members of the local and wider community who oppose the disposal of the Proposed Plan Change site.

### **3. DESCRIPTION AND HISTORY OF THE SITE**

The site is situated on the northern side of Poto Road at its intersection with Normandale Road. The land is covered in a mixture of gorse and regenerating native vegetation. The vehicle access to the Normandale Playcentre runs across the site. The site is elevated above the properties on the southern side of Poto Road. A Department of Conservation (DoC) reserve (held under the provisions of the Reserves Act) and the Normandale Playcentre are situated immediately north of the site. The wider surrounding properties are within the General Residential Activity Area and are largely used for residential purposes.

The site is made up of two parts:

- Site a. part of the site is a fee simple title owned by Council and legally described as Pt Sec 93 Normandale Settlement (SO33438), title ref 26B/735 (1055m<sup>2</sup>). This land currently has no zoning and is identified as road in the District Plan.
- Site b. the remainder of the site (2993m<sup>2</sup>) was held by Council since 1983 as legal road. The area has not been used as road. After a resolution of Council and through the provisions of the Public Works Act the road has now been stopped (Gazette Notice 5/11/09, No. 161, p. 3894). The land is now also held in fee simple and the legal description is Sec 1 SO 33438. It currently has no zoning and is identified as road in the District Plan.

A search of previous district plans and schemes reveals the following:

1964 City of Lower Hutt District Scheme:

Both parcels were part of a larger parcel (including the land to the north) which was zoned residential

1978 First Review of the District Scheme:

The larger parcel had been divided into two parts, a northern part designated for Primary School (today DoC Reserve and Playcentre) and a southern part (sites a. and b. of the proposed plan change) zoned General Residential with an indication of a future road

1983 Second Review of the District Scheme

The northern part was designated for Education Purposes with an underlying General Residential zoning while the southern part was identified as 'proposed road'.

1995 Proposed District Plan

The northern part is zoned partially as General Recreation (today: DoC Reserve) and partially as General Residential (today: Normandale Playcentre) while the southern part (sites a. and b.) is identified as road (note: site a. was not 'road' in legal terms).

It is noted that as a result of this development the land is currently left without zoning in the District Plan which is very unusual.

A research of the ownership shows that both sites were acquired by Council in 1983 under the Public Works Act 1981:

Site a. was described as 'land acquired in connection with roads' while site b. was 'land acquired for road'. This explains the difference in legal status of both sites. Though both sites were purchased for roading related purposes site a. was held in fee simple by Council while the status of site b. has only recently been changed after the road stopping procedures were completed in November 2009. It is now held in fee simple as well.

#### 4. LIST OF SUBMITTERS

The following submitters have lodged submissions on Plan Change 15:

Submission Number	Name of Original Submitters	Submission Reference
DPP12-5-15-001	Sandra Greig	1.1
DPP12-5-15-002	John Barnett	2.1
DPP12-5-15-003	Helen Lukes	3.1
DPP12-5-15-004	Normandale Playcentre	4.1
DPP12-5-15-005	Jenny Grimmett	5.1, 5.2
DPP12-5-15-006	Rosemary McLennan	6.1
DPP12-5-13-007	Normandale Residents Association	7.1
DPP12-5-13-008	Wellington Tenths Trust	8.1
DPP12-5-13-009	Melvin Galletly	9.1
DPP12-5-13-010	Leanne Killalea	10.1

<b>Further Submission Number</b>	<b>Name of Further Submitters</b>	<b>Further Submission Reference</b>
DPP12-5-15-011	Lower Hutt Historical Society Inc.	11.1
DPP12-5-15-012	Grant Roberts	12.1, 12.2
DPP12-5-15-013	Normandale Residents Association	13.1, 13.2, 13.3
DPP12-5-15-014	Normandale Playcentre	14.1

## 5. ANALYSIS OF SUBMISSIONS AND RECOMMENDATIONS

The following sections of this report provide a brief summary of each submission and a recommendation in response to each of the decisions sought.

The submissions are addressed by submitter. In the heading the submission number, the name of the submitter and the submission reference are printed in bold. Then the decision sought by the submitter is outlined and specific comments made by the submitter are summarised. This is followed by a discussion of the issues raised and the officer's recommendation. Where a submitter seeks more than one decision the submission has been split into parts with different submission references (e.g. 5.1, 5.2). This is followed by the further submissions that refer to that submission. Here the submission number, the name of the further submitter and the submission reference and whether the further submission is in support or opposition are printed in bold italics.

With respect to determining the scope of a submission, reference is made to Clause 6 of the First Schedule to the Resource Management Act 1991 (referred to as the Act) which states:

*"6. Making submissions*

*Any person, including the local authority in its own area, may, in the prescribed form, make a submission to the relevant local authority on a proposed policy statement or plan that is publicly notified under clause 5."*

A submission on a plan change is therefore limited in that it must be "on" the plan change.

In the case of Plan Change 15 the purpose of the Plan Change was to address the intention to zone a Council owned parcel of land as General Residential Activity Area.

Accordingly, for a submission to be deemed to be within the scope of Plan Change 15 the submission must relate to any one of the issues addressed in the Plan Change.

A further submission is limited to a matter in support of, or opposition to, an original submission. It cannot raise new issues that haven't been addressed in one of the original submissions.

Submission:

## **DPP12-5-15-001 - Sandra Greig - 1.1**

### **Request of Submitter**

The submitter supports Hutt City Council in selling the land for Residential Activity.

### **Specific Comments**

The submitter thinks selling the land and building homes is the right thing to do as long as the driveway is not shared with the Playcentre (for safety reasons). The submitter has no worries with sun, privacy or building codes and states that new housing is needed to help populate the suburb, which could result in the opening of the link to Harbour View. Furthermore the submitter states that the suburb has the Belmont Regional Park right on their doorstep and therefore won't lack clean and green even if the Plan Change goes ahead.

### **Discussion**

It is considered that the zoning of the site as general residential is appropriate. First assessments commissioned by Council as part of the process confirm the position of Council that the rezoning of the land will not have any significant adverse effects on the environment. This has been supported by further assessments undertaken as part of the plan change process. An ecological assessment finds that although the site has some ecological value these values of the site are low because of its small size, poor conditions, the likelihood of succession to vegetation that is not representation of forest in the area and vulnerability to edge effects. Therefore the assessment comes to the conclusion that even the total loss of vegetation if it were rezoned for residential development would represent a minor adverse ecological effect.

The District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City. The main objectives for General Residential Activity Areas with relevance to this plan change are:

#### *4A 1.1.1 Residential Character and Amenity Values*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City; and*

#### *4A 1.2.1 Building Height, Scale, Intensity and Location*

*To avoid remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

To achieve these objectives the District Plan has established several policies such as

#### *4A 1.1.1 Residential Character and Amenity Values*

*(c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.*

*(d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.*

*(e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.*

*(f) That the clearance of vegetation be managed to avoid, remedy or mitigate any adverse effects on the intrinsic values of ecosystems.*

#### *4A 1.2.1 Building Height, Scale, Intensity and Location*

- (a) *To establish a minimum net site area and maximum site coverage requirement to ensure medium density development is achieved.*
- (c) *To ensure all new development is of a height and scale, which is compatible with surrounding residential development.*
- (e) *To manage the siting of all buildings so as to minimise detraction from the character and visual attractiveness of the surrounding residential activity area.*
- (f) *To manage the siting of all buildings so as to minimise detraction from the amenities of adjoining properties.*

These objectives and policies result in a set of rules which aim at retaining the amenity values and achieving the objectives outlined before including (but not limited to) a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and limitations regarding the removal of vegetation. The proposed zoning as General Residential Activity is considered to be in keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties.

It is important to keep in mind that the subdivision plan shown in the plan change document is just an indicative plan reflecting the site development parameters of the District Plan. The plan is presented as no more than an example of how the land might be developed and there could well be other feasible means of subdividing the land. This plan change does not determine the actual pattern or shape of any future subdivision, it just determines the parameters and framework for future residential development.

The attached indicative 7 lot subdivision plan demonstrates that the site can be subdivided in a way that does not affect the driveway/access to the Normandale Playcentre but would create the opportunity for additional carparking for the playcentre off the existing driveway. A Traffic Assessment undertaken by Barclay Traffic Planning comes to the conclusion that the land can be feasibly developed as shown in the indicative subdivision plan with access from the southern boundary and that this access can be expected to operate safely.

Any actual subdivision plan would be subject to the requirements of Chapter 11 – Subdivision of the District Plan. Under Chapter 11 any subdivision in a General Residential Activity Area is a controlled activity.. This means that any subdivision needs resource consent and that resource consent must be granted if the subdivision complies with all standards and terms specified in the chapter. The standards and terms outlined in the subdivision chapter include but are not limited to the following subjects: allotment design, access, stormwater, wastewater, earthworks. As soon as the subdivision does not comply with any of the standards and terms it becomes either a restricted discretionary activity or a fully discretionary activity. As a result of the very limited quantity of permitted earthworks with a maximum volume of 50m<sup>3</sup> per site, it is most likely that any subdivision application in this area would become a restricted discretionary activity.

Furthermore Council is currently in the process of granting a right of way to the Playcentre over the current formed access. The next step in the process will be the registration of the easement. As part of this separate process the Ministry of Education has been consulted with and is cooperative to the proposal.

### **Recommendation**

It is recommended that the submission lodged by Sandra Greig be **accepted** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.



*Further Submission:*

**DPP12-5-15-013 - Normandale Residents Association - 13.3 - Opposition**

**Purpose of Further Submission:**

The further submitter opposes the submissions of Sandra Greig.

**Specific Comments**

The further submitter is in disagreement with the following arguments raised in the submission:

- The land was once “residential”;
- The need for “new housing”;
- Normandale doesn’t “lack clean and green”;
- The development of the Normandale to Harbour View Link Road.

**Discussion**

Please refer to discussion above (submission 1.1 by Sandra Greig).

**Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

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*Submission:*

**DPP12-5-15-002 – John Barnett – 2.1**

**Request of Submitter**

The submitter requests that Council creates a reserve.

**Specific Comments**

The submitter encourages Council to provide the maximum opportunity for recreation by creating a reserve that is generous in size, not spoilt by too much nearby housing and suitable for an evening walk from home.

**Discussion**

The option of creating a reserve on the sites covered by the proposed plan change has been taken into account but not been found to be the most appropriate use of the site. An early assessment of the open space contribution of the site along with an assessment of the development potential has been undertaken as part of the land review process in 2007. These early reports concluded that the site has good development potential and due to its location within an existing General Residential Activity Area it would be appropriate to zone the site General Residential as well. This zoning would fit well within the context of the surrounding land uses and would be an efficient use of the existing utilities and infrastructure. It was also established that the overall level of significance of the site was low regarding criteria as landscape, ecology and recreation.

As part of the actual plan change process Council commissioned a further more detailed report which also concluded that zoning the sites as general residential is appropriate in the context of the existing residential character of the area.

It needs to be kept in mind that at the moment neither the site of the proposed plan change nor the adjoining DoC Reserve to the north are used for formal recreational purposes or offer any recreational opportunities, neither having any formal tracks or facilities. An informal track across site a. seems not to be used anymore and appears to be completely overgrown.

While the actual development of the sites is not subject of the proposed plan change the indicative subdivision plan provided as part of the plan change documents shows that there is the opportunity to develop access to the Recreation Reserve immediately to the north of the sites and to provide a short walking/biking trail along with a picnic area, viewing points and a small 'adventure playground' within that reserve. Aside from that there are other reserves in the surrounding area (see PAOS Assessment of Open Space and Visual Amenity, page 11) which provide opportunities for informal recreation and walking connections and these connections will not be altered as part of the plan change.

### **Recommendation**

It is recommended that the submission lodged by John Barnett be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### **DPP12-5-15-012 - Grant Hector Roberts – 12.1 - Support**

#### **Purpose of Further Submission:**

The further submitter supports the submission of John Barnett and requests that the submission be allowed in its entirety.

#### **Specific Comments**

The further submitter argues that the site at Poto Road is an element of the essential character of Normandale and of the Western Hills in general and that it is part of the history and heritage of Normandale. He lists existing intrinsic and amenity values (Green Backdrop, Natural Skyline, Ecological Importance, Wildlife Corridor and Recreational Amenity) and points out that the indicative development (or any other development) would compromise the existing DoC-owned Reserve in several ways (impact on views, biodiversity, erosion, rubbish dumping, groundwater conditions etc).

The further Submitter then refers to the heritage value of the site for it was part of Normandale's original School Reserve and argues that when the new Normandale School was established it was agreed that in exchange for the new school being built on reserve land the old school site would be made reserve.

The further submitter states that the development provided for by the plan change would have damaging effects, one of them being to obscure the view from the hilltop.

#### **Discussion**

Please refer to discussion above (submission 2.1 by John Barnett).

#### **Recommendation**

It is recommended that the further submission lodged by Grant Hector Roberts be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

**DPP12-5-15-013 - Normandale Residents Association – 13.1 - Support**

**Purpose of Further Submission:**

The further submitter supports in whole the submission of John Barnett and agrees with all the arguments put forward.

**Specific Comments**

The further submitter declares that he is in agreement with the following arguments raised in the submission:

- Retention of the land as a community recreation area;
- Failure to address residential amenity matters.

**Discussion**

Please refer to discussion above (submission 2.1 by John Barnett).

**Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

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*Submission:*

**DPP12-5-15-003 – Helen Lukes – 3.1**

**Request of Submitter**

The submitter requests that Council creates a recreation area for children to play, dog walking and relaxation.

**Specific Comments**

The submitter opposes the intention to destroy a green area of Normandale's heritage.

**Discussion**

The option of creating a reserve on the sites covered by the proposed plan change has been taken into account but not been found to be the most appropriate use of the site. An early assessment of the open space contribution of the site along with an assessment of the development potential has been undertaken as part of the land review process in 2007. These early reports concluded that the site has good development potential and due to its location within an existing General Residential Activity Area it would be appropriate to zone the site General Residential as well. This zoning would fit well within the context of the surrounding land uses and would be an efficient use of the existing utilities and infrastructure. It was also established that the overall level of significance of the site was low regarding criteria as landscape, ecology and recreation.

The District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City. The main objectives for General Residential Activity Areas with relevance to this plan change are:

#### *4A 1.1.1 Residential Character and Amenity Values*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City; and*

#### *4A 1.2.1 Building Height, Scale, Intensity and Location*

*To avoid remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

To achieve these objectives the District Plan has established several policies such as

#### *4A 1.1.1 Residential Character and Amenity Values*

- (c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.*
- (d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.*
- (e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.*
- (f) That the clearance of vegetation be managed to avoid, remedy or mitigate any adverse effects on the intrinsic values of ecosystems.*

#### *4A 1.2.1 Building Height, Scale, Intensity and Location*

- (a) To establish a minimum net site area and maximum site coverage requirement to ensure medium density development is achieved.*
- (c) To ensure all new development is of a height and scale, which is compatible with surrounding residential development.*
- (e) To manage the siting of all buildings so as to minimise detracting from the character and visual attractiveness of the surrounding residential activity area.*
- (f) To manage the siting of all buildings so as to minimise detracting from the amenities of adjoining properties.*

These objectives and policies result in a set of rules which aim at retaining the amenity values and achieving the objectives outlined before including (but not limited to) a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and limitations regarding the removal of vegetation. The proposed zoning as General Residential Activity is considered to be in keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties.

As part of the actual plan change process Council has commissioned a further more detailed report which also concluded that zoning the sites as general residential is appropriate in the context of the existing residential character of the area.

The Assessment of Open Space and Visual Amenity also finds that the site of the proposed plan change is not suitable for a playground because the site lies above the road on two sides, with a steep drop to the road below making a play space for young children potentially unsafe.

An ecological assessment commissioned by Council to address concerns raised by submitters during the plan change process comes to the conclusion that the site has some ecological value as animal habitat and therefore the loss of the site would have some adverse ecological effects. However the habitat and the other ecological values of the site are low because of its small size, poor conditions, the likelihood of succession to vegetation that is not representation of forest in the area and vulnerability to edge effects. Therefore even the total loss of vegetation if it were rezoned for residential development would represent a minor adverse ecological effect.

It needs to be kept in mind that at the moment neither the site of the proposed plan change nor the adjoining DoC Reserve to the north are used for formal recreational purposes or offer any recreational opportunities, neither having any formal tracks or facilities. An informal track across site a. seems not to be used anymore and appears to be completely overgrown.

While the actual development of the sites is not subject of the proposed plan change the indicative subdivision plan provided as part of the plan change documents shows that there is the opportunity to develop access to the Recreation Reserve immediately to the north of the sites and to provide a short walking/biking trail along with a picnic area, viewing points and a small 'adventure playground' within that reserve.

### **Recommendation**

It is recommended that the submission lodged by Helen Lukes be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### **DPP12-5-15-012 - Grant Hector Roberts – 12.1 - Support**

#### **Purpose of Further Submission:**

The further submitter supports the submission of Helen Lukes and requests that the submission be allowed in its entirety.

#### **Specific Comments**

The further submitter argues that the site at Poto Road is an element of the essential character of Normandale and of the Western Hills in general and that it is part of the history and heritage of Normandale. He lists existing intrinsic and amenity values (Green Backdrop, Natural Skyline, Ecological Importance, Wildlife Corridor and Recreational Amenity) and points out that the indicative development (or any other development) would compromise the existing DoC-owned Reserve in several ways (impact on views, biodiversity, erosion, rubbish dumping, groundwater conditions etc).

The further Submitter then refers to the heritage value of the site for it was part of Normandale's original School Reserve and argues that when the new Normandale School was established it was agreed that in exchange for the new school being built on reserve land the old school site would be made reserve.

The further submitter states that the development provided for by the plan change would have damaging effects, one of them being to obscure the view from the hilltop.

#### **Discussion**

Please refer to discussion above (submission 3.1 by Helen Lukes).

#### **Recommendation**

It is recommended that the further submission lodged by Grant Hector Roberts be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

**DPP12-5-15-013 - Normandale Residents Association – 13.1 - Support**

**Purpose of Further Submission:**

The further submitter supports in whole the submission of Helen Lukes and agrees with all the arguments put forward.

**Specific Comments**

The further submitter declares that he is in agreement with the following arguments raised in the submission:

- Historically the land was designated for recreational use;
- Retention of the land as a community recreation area;
- Protection and preservation of the biodiversity; flora and fauna; and “green area”;
- Failure to address residential amenity matters.

**Discussion**

Please refer to discussion above (submission 3.1 by Helen Lukes).

**Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

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*Submission:*

**DPP12-5-15-004 – Normandale Playcentre – 4.1**

**Request of Submitter**

The submitter seeks to zone the two parcels of land on Poto Road corner as General Recreation Activity Area.

**Specific Comments**

The submitter provides information that during an internal survey amongst the members of Normandale Playcentre all 34 members voted to keep the land as a reserve.

**Discussion**

The option of creating a reserve on the sites covered by the proposed plan change has been taken into account but not been found to be the most appropriate use of the site. An early assessment of the open space contribution of the site along with an assessment of the development potential has been undertaken as part of the land review process in 2007. These early reports concluded that the site has good development potential and due to its location within an existing General Residential Activity Area it would be appropriate to zone the site General Residential as well. This zoning would fit well within the context of the surrounding land uses and would be an efficient use of the existing utilities and infrastructure. It was also established that the overall level of significance of the site was low regarding criteria as landscape, ecology and recreation.

As part of the actual plan change process Council has then commissioned a further more detailed report which also concluded that zoning the sites as general residential is appropriate in the context of the existing residential character of the area.

The District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City. The main objectives for General Residential Activity Areas with relevance to this plan change are:

*4A 1.1.1 Residential Character and Amenity Values*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City; and*

*4A 1.2.1 Building Height, Scale, Intensity and Location*

*To avoid remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

To achieve these objectives the District Plan has established several policies such as

*4A 1.1.1 Residential Character and Amenity Values*

- (c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.*
- (d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.*
- (e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.*
- (f) That the clearance of vegetation be managed to avoid, remedy or mitigate any adverse effects on the intrinsic values of ecosystems.*

*4A 1.2.1 Building Height, Scale, Intensity and Location*

- (a) To establish a minimum net site area and maximum site coverage requirement to ensure medium density development is achieved.*
- (c) To ensure all new development is of a height and scale, which is compatible with surrounding residential development.*
- (e) To manage the siting of all buildings so as to minimise detraction from the character and visual attractiveness of the surrounding residential activity area.*
- (f) To manage the siting of all buildings so as to minimise detraction from the amenities of adjoining properties.*

These objectives and policies result in a set of rules which aim at retaining the amenity values and achieving the objectives outlined before including (but not limited to) a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and limitations regarding the removal of vegetation. The proposed zoning as General Residential Activity is considered to be in keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties.

The Assessment of Open Space and Visual Amenity also finds that the site of the proposed plan change would not be suitable for development as a kick-a-ball/playground space because the sites lie above the road on two sides with a steep drop to the road below, making the a play space for young children potentially unsafe. Any development of a play area on these sites would not only necessitate the removal of most of the existing vegetation but would also require safety fencing above the steep drop to the road below on the southern side of the site.

An ecological assessment commissioned by Council to address concerns raised by submitters during the plan change process comes to the conclusion that the site has some ecological value as animal habitat and therefore the loss of the site would have some adverse ecological effects. However the habitat and the other ecological values of the site are low

because of its small size, poor conditions, the likelihood of succession to vegetation that is not representation of forest in the area and vulnerability to edge effects. Therefore even the total loss of vegetation if it were rezoned for residential development would represent a minor adverse ecological effect.

It needs to be kept in mind that that the site of the plan change is currently not zoned as reserve or recreational area in the District Plan and that at the moment neither the site of the proposed plan change nor the adjoining DoC Reserve to the north are used for formal recreational purposes or offer any recreational opportunities, neither having any formal tracks or facilities. An informal track across site a. seems not to be used anymore and appears to be completely overgrown.

Concerns of the submitter raised during earlier consultation regarding their driveway and the possibility of the driveway being used as access to the residential development have been addressed and as a result a new indicative subdivision plan has been developed. This adapted indicative subdivision plan moved the access to the southern boundary of the plan change site. A traffic assessment undertaken by Barclay Traffic Consulting comes to the conclusion that the land can be feasibly developed as shown in the indicative layout with satisfactory visibility characteristics and that there could be other layouts which could also be considered. Overall the assessment confirms that access to a potential development from the southern boundary could be achieved in a feasible and safe way.

Council is currently in the process of granting a right of way to the Playcentre over the current formed access. The next step in the process will be the registration of the easement. As part of this separate process the Ministry of Education has been consulted with and is cooperative to the proposal.

### **Recommendation**

It is recommended that the submission lodged by Normandale Playcentre be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### ***DPP12-5-15-012 - Grant Hector Roberts – 12.1 - Support***

#### **Purpose of Further Submission:**

The further submitter supports the submission of Normandale Playcentre and requests that the submission be allowed in its entirety.

#### **Specific Comments**

The further submitter argues that the site at Poto Road is an element of the essential character of Normandale and of the Western Hills in general and that it is part of the history and heritage of Normandale. He lists existing intrinsic and amenity values (Green Backdrop, Natural Skyline, Ecological Importance, Wildlife Corridor and Recreational Amenity) and points out that the indicative development (or any other development) would compromise the existing DoC-owned Reserve in several ways (impact on views, biodiversity, erosion, rubbish dumping, groundwater conditions etc).

The further Submitter then refers to the heritage value of the site for it was part of Normandale's original School Reserve and argues that when the new Normandale School



was established it was agreed that in exchange for the new school being built on reserve land the old school site would be made reserve.

The further submitter states that the development provided for by the plan change would have damaging effects, one of them being to obscure the view from the hilltop.

#### **Discussion**

Please refer to discussion above (submission 4.1 by Normandale Playcentre).

#### **Recommendation**

It is recommended that the further submission lodged by Grant Hector Roberts be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

#### **DPP12-5-15-013 - Normandale Residents Association – 13.1 - Support**

#### **Purpose of Further Submission:**

The further submitter supports in whole the submission of Normandale Playcentre and agrees with all the arguments put forward.

#### **Specific Comments**

The further submitter declares that he is in agreement with the following argument raised in the submission:

- Retention of the land as a community recreation area.

#### **Discussion**

Please refer to discussion above (submission 4.1 by Normandale Playcentre).

#### **Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Submission:*

#### **DPP12-5-15-005 – Jenny Grimmett – 5.1**

#### **Request of Submitter**

The submitter requests that Council approves the plan change and apologises to the residents for incorrectly giving them the impression that seven residential sites could be developed as of right on the plan change site.

#### **Specific Comments**

The submitter considers that the Proposed Plan Change is not necessary because the District Plan rules allow a general residential zoning to apply without the need for a plan change. Furthermore the submitter considers the information provided not suitable to justify the Proposed Plan Change and assumes the plan change process should at least be stopped until the missing information can be addressed more satisfactory. The submitter criticises that Council gives the false impression that as a result of the plan change the subdivision shown

in the indicative subdivision plan could be undertaken as of right. Furthermore it is criticised that the ecological assessment is not substantiated, a traffic assessment is missing and residential matters are ignored.

### **Discussion**

The site subject to the proposed plan change is made up of two parts:

Site a. covers the southern part of the plan change area and is legally described as Pt SEC 93 SO 33438. It is a fee simple title owned by Council.

Site b. is the northern part of the plan change area and is legally described as SEC 1 SO 33438. It was held by Council as legal road since 1983 but has never been used as road. After a resolution of Council and through the provisions of the Public Works Act the road has been stopped. The road stopping procedures were completed in November 2009 (Gazette Notice 5/11/09, NO. 161, p.3894) and is now held by Council in fee simple as well.

The district plan map B3 indicates Poto Road in white and both these sites are within the white area, which indicates road. However, this indication on the Map does not make these sites legal road and it is clear the sites are not being used as road either. The submitter refers to Rule 14A (a) of the District Plan. This rule only refers to the status of roads (ie, roads take on the adjoining zoning). Site a. was never held as legal road and after the completion of the road stopping process for site b. both sites are no longer legal road and therefore rule 14A (a) does not apply. Accordingly, both sites have no zoning under the District Plan and therefore any use of the land, including residential development, would have to be considered non-complying. Accordingly, a plan change is required to ensure that rather than remaining unzoned, the sites are given an appropriate zoning.

Council has always pointed out that the indicative subdivision plan attached to the plan change document is only one possible option of developing the land under the intended zoning as General residential Activity Area and that any subdivision proposal would be the subject of a separate resource consent process (pages 8 and 9). The main purpose of the indicative subdivision plan was to provide an example of how the land might be developed applying the district plan rules for general residential areas. Council consciously chose to present an indicative subdivision plan that showed what is in theory the maximum possible development under the general residential rules without anticipating the results of a resource consent process.

Although the Assessment of Open Space and Visual Amenity covers some ecological aspects it is agreed that it can't replace a full ecological assessment. Therefore an independent ecological assessment of the site and the potential zoning as General Residential Activity Area under the District Plan has been commissioned by Council. The assessment comes to the conclusion that the site has some ecological value as animal habitat and therefore the loss of the site would have some adverse ecological effects. However the habitat and the other ecological values of the site are low because of its small size, poor conditions, the likelihood of succession to vegetation that is not representation of forest in the area and vulnerability to edge effects. Therefore even the total loss of vegetation if it were rezoned for residential development would represent only a minor adverse ecological effect.

Furthermore the lack of a traffic assessment has been criticised by the submitter. As a result Council has commissioned a report to consider the implications of the proposed plan change. The report covers the areas of access safety, road safety, traffic generation and access standards and comes to the conclusion that the land can be feasibly developed as

shown in the indicative layout with satisfactory visibility characteristics and that there could be other layouts which could also be considered. Overall the assessment confirms that access to a potential development from the southern boundary could be achieved in a feasible and safe way.

It is agreed that zoning the sites as General Residential Activity Area would alter the visual amenity of the area, however the type of development provided by a general residential zoning is considered appropriate in the context of the existing residential character of the area. Extending the residential along the ridgeline would fit with the existing pattern of development in the 'Western Hills Identity Area', where residential properties are generally situated on ridgelines, with regenerating gullies and escarpments maintained as reserve land.

### **Recommendation**

It is recommended that the submission lodged by Jenny Grimmett be **partially accepted** to the extent that Council proceeds with the plan change process and the provisions of Proposed Plan Change 15 remain unchanged.

It is recommended that the submission lodged by Jenny Grimmett be **partially rejected** to the extent that Council does not consider it has given incorrect information about the possible development of the site.

#### *Further Submission:*

#### ***DPP12-5-15-012 - Grant Hector Roberts – 12.2 – Support in part***

#### **Purpose of Further Submission:**

The further submitter supports in parts the submission of Jenny Grimmett and seeks that the submission be allowed in part, i.e. as regards the insufficiency or incorrectness and poor reasoning in the documentation, ecological, stormwater and traffic assessments and the lack of any real assessment of the amenity values enjoyed by residents of the area.

#### **Specific Comments**

The further submitter agrees with the submission of Jenny Grimmett to the extent that he considers the documents provided are in conflict/flawed, that insufficient and/or incorrect information is being given, that residential amenity matters are being ignored and that there is a desk top study reporting approach.

#### **Discussion**

Please refer to discussion above (submission 5.1 by Jenny Grimmett).

#### **Recommendation**

It is recommended that the further submission lodged by Grant Hector Roberts be **rejected** to the extent that Council does not consider it has given incorrect information about the possible development of the site and therefore proceeds with the plan change process and the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

**DPP12-5-15-013 - Normandale Residents Association – 13.2 – Support in part**

**Purpose of Further Submission:**

The further submitter supports in part the submission of Jenny Grimmett and agrees with the arguments put forward that are in accord with their submission.

**Specific Comments**

The further submitter is in agreement with Jenny Grimmett considering the limitations of the PAOS report which include:

- Lack of ecological assessment;
- Lack of traffic assessment;
- Lack of stormwater assessment;
- Failure to address residential amenity matters;
- Failure to address access to Playcentre;
- Inclusion of incorrect plans.

**Discussion**

Please refer to discussion above (submission 5.1 by Jenny Grimmett).

**Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that Council does not consider it has given incorrect information about the possible development of the site and therefore proceeds with the plan change process and the provisions of Proposed Plan Change 15 remain unchanged.

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Submission:

**DPP12-5-15-005 – Jenny Grimmett – 5.2**

**Request of Submitter**

The submitter seeks to resolve all access and parking issues relating to Normandale Playcentre so there are no problems with this if the two sites are on-sold.

**Specific Comments**

The submitter states that the Proposed Plan Change does not provide for the maintenance and protection of the existing access for the Playcentre. The submitter addresses the need to establish some kind of right of way or other easement prior to the sale to avoid the Playcentre becoming landlocked.

**Discussion**

Parallel to the plan change process, Council is currently in the process of granting a right of way to the Playcentre over the current formed access. The next step in the process will be the registration of the easement. As part of this separate process the Ministry of Education has been consulted with and is cooperative to the proposal.

Concerns raised by the Normandale Playcentre during earlier consultation regarding their driveway and the possibility of the driveway being used as access to the residential development have been addressed and as a result a new indicative subdivision plan has

been developed. This adapted indicative subdivision plan moved the access to the southern boundary of the plan change site. A traffic assessment undertaken by Barclay Traffic Consulting comes to the conclusion that the land can be feasibly developed as shown in the indicative layout with satisfactory visibility characteristics and that there could be other layouts which could also be considered. Overall the assessment confirms that access to a potential development from the southern boundary could be achieved in a feasible and safe way.

### **Recommendation**

It is recommended that the submission lodged by Jenny Grimmatt be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

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Submission:

**DPP12-5-15-006 – Rosemary McLennan – 6.1**

### **Request of Submitter**

The submitter requests that Council goes ahead with the proposal.

### **Specific Comments**

The submitter supports that the land was intended for roading, not a park and that if the roading plans would have been put through the old road would have been developed into sections.

### **Discussion**

It is considered that the zoning of the site as general residential will allow the site to be developed in an appropriate efficient manner. The site is presently un-used and the use for which it was acquired (roading) is no longer considered necessary. The assessments commissioned by Council as part of the process confirm that the rezoning of the land will not have any significant adverse effects on the environment. The General Residential Activity Area zoning is therefore considered appropriate given the size, character and location of the site in relation to other General Residential Activity Area land.

The District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City. The main objectives for General Residential Activity Areas with relevance to this plan change are:

*4A 1.1.1 Residential Character and Amenity Values*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City; and*

*4A 1.2.1 Building Height, Scale, Intensity and Location*

*To avoid remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

To achieve these objectives the District Plan has established several policies such as

#### 4A 1.1.1 Residential Character and Amenity Values

- (c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.
- (d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.
- (e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.
- (f) That the clearance of vegetation be managed to avoid, remedy or mitigate any adverse effects on the intrinsic values of ecosystems.

#### 4A 1.2.1 Building Height, Scale, Intensity and Location

- (a) To establish a minimum net site area and maximum site coverage requirement to ensure medium density development is achieved.
- (c) To ensure all new development is of a height and scale, which is compatible with surrounding residential development.
- (e) To manage the siting of all buildings so as to minimise detracting from the character and visual attractiveness of the surrounding residential activity area.
- (f) To manage the siting of all buildings so as to minimise detracting from the amenities of adjoining properties.

These objectives and policies result in a set of rules which aim at retaining the amenity values and achieving the objectives outlined before including (but not limited to) a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and limitations regarding the removal of vegetation. The proposed zoning as General Residential Activity is considered to be in keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties.

#### **Recommendation**

It is recommended that the submission lodged by Rosemary McLennan be **accepted** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### **DPP12-5-15-013 - Normandale Residents Association - 13.3 - Opposition**

#### **Purpose of Further Submission:**

The further submitter opposes the submission of Rosemary McLennan.

#### **Specific Comments**

The further submitter is in disagreement with the following argument raised in the submission:

- That the "old road would have been sections".

#### **Discussion**

Please refer to discussion above (submission 6.1 by Rosemary McLennan).

#### **Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

Submission:

**DPP12-5-13-007 – Normandale Residents Association – 7.1**

**Request of Submitter**

The submitter seeks to zone Poto Road corner, Normandale, as General Recreation Activity Area; to classify the land as a recreation reserve subject to the Reserves Act; and for the land to be added to Hutt City Council's reserve network.

**Specific Comments**

The submitter gives the following comments:

Historical

The submitter states that the land to be zoned is part of the former Normandale School site which itself is part of the historic landscape of Normandale and that the Poto Road corner meets the heritage criteria as outlined in Hutt City Council's 'Reserve Land Acquisition/Disposal Policy and Guidelines' (2003).

The submitter states that there has been a historic community expectation for the site becoming a reserve. Also, it would be of historical significance to Normandale if the site was re-integrated with the Department of Conservation land and there is a common understanding that the land would be used for community purposes.

Present Day

The submitter states that the community wants a reserve: A survey conducted by the submitter in November 2009 had 71 out of 77 respondents wanting the land to be kept as reserve and Council consultation in 2008 regarding the site received 11 submissions, 10 of which were opposing the disposal of the site.

The submitter then states that the community needs a reserve because there are changes in demographics in Normandale, but resources available to meet community needs (e.g.: a playground) have remained unchanged and because the existing recreational sites in and around Normandale are either unsuitable or inaccessible to parents with young children and those who are physically infirm.

The submitter further states that the Western Hills is the only Landscape Identity Area identified in the Council's Reserves Strategic Directions without any active recreation for its residents and having the least amount of conservation reserve area.

Impact of peri-urban and piecemeal development on communities

The submitter believes that it is important to retain the sense of place and the visual and recreational environment within the peri-urban landscape of Normandale and the contribution that this landscape makes to the social, economic, physical and mental health of residents and the city as a whole. The benefits from vegetation and non-commercial forestry within a peri-urban environment are being landscape enhancement; a sense of well-being; a sense of place; habitat for wildlife; and generation of microclimate.

Ecological Value

The Submitter criticises the lack of an ecological assessment and provides its own assessment of biodiversity and ecological values of the site. This assessment undertaken by the Normandale residents Association found that the Proposed Plan Change site has a wide range of flora and fauna which was not recognised by the Proposed Plan Change document.

### Meeting Reserve Key Directions

The submitter argues that the Poto Road corner meets a number of key directions and principles outlined in Hutt City Council's 'Reserves Strategic Directions' document, namely the consolidation of existing reserve network; environmental enhancement; recreational access; and strengthening community relationships.

### Meeting the Reserve Land Acquisition/Disposal Policy and Guidelines

The submitter argues that the Poto Road corner has a number of high/medium significant features, when assessed against the criteria set by the Council's Reserve Land Acquisition/Disposal Policy Guidelines, namely: landscape-visual; landscape-open space; landscape-natural site features; ecological; recreational-informal; and heritage.

### Maintaining Normandale's Character

The submitter argues that zoning the Poto Road corner as General Residential Activity Area would contravene a number of policies outlined in the District Plan for the Hill Residential Activity Area and that building houses on the Poto Road corner will alter the visual amenity value and character of the suburb for the following reasons. The proposed development plan is inconsistent with low density residential character of the suburb; the clearance of vegetation and earthworks will destroy the existing ecosystem; and the building of houses on the site will result in a permanent loss of the characteristic 'green skyline'.

Finally the submitter argues that Hutt City Council's development plans for the site are incongruent with the policies outlined in the District Plan and therefore Council's actions are in breach of Section 84 of the RMA.

A petition of 644 members of the local and wider community who oppose the disposal of the Proposed Plan Change site is attached with the submission.

## **Discussion**

### Historical

The submitter suggests that the site of the plan change is of historical significance to Normandale and Lower Hutt for it being part of the original site of the Normandale School opening in 1911. Although the old Normandale School closed in 1937 the original school building still exists and is used by the Normandale Playcentre since 1957. After the closure of the school in 1937 the site was leased for grazing while the building was used for local events. Although the old school building is undoubtedly of historical value to the community it can be questioned that actual site is of the same heritage significance. Today the southern part of the school site is completely overgrown and it is hard to see the connection of this site to the original school site and the old school building.

The fact that both lots were acquired by Council in 1983 for the purpose of road or in connection with road leaves room for the interpretation that both lots were not seen as sites of significant heritage value. The purpose under which both sites were purchased as well as the zoning through the different phases of District Schemes and District Plans does not reflect any intention of Council to create a recreational reserve at the site. It can therefore be assumed that the idea of creating a reserve has been given up at some point. Although the original intention for the site may have been to use it as a recreational reserve at some stage, this intention has never been reflected by the District Scheme/Plan. As mentioned under '3. Description and History of the Site' the plan change site has gone through a couple of different zonings through the different stages and plans. It was first zoned residential (1964 – City of Lower Hutt District Scheme), then general residential with an indication of a



future road (1978 – First Review of the District Scheme), then as proposed road (1983 – Second Review of the District Scheme) and finally as road (1995 – Proposed District Plan). None of these zonings reflects any intention of using the land as a recreational reserve.

When assessed against the criteria outlined in the Council’s Reserve Land Acquisition/Disposal Policy and Guidelines the sites have a low level of heritage significance. The heritage criteria in the Council’s Reserve Land Acquisition/Disposal Policy and Guidelines states that an area has medium or high level of significance if it is registered Category I or II under the Historic Places Act and where “acquisition of the land for reserve purposes is considered essential” or “are complementary to wider reserve objectives”. This is not the case with the sites. Heritage value is considered to be low where a feature is present and may be of immediate local value but of little significance to the wider area, and therefore has lower priority.

#### Present Day

It needs to be kept in mind that the sites of the plan change are currently not a recreation reserve. While the land abutting the plan change site to the north is classified as a reserve the plan change site has no such classification. At the moment both lots have no zoning at all under the District Plan. This is a result of the road stopping process for site b. which was completed in November 2009. Both sites are now held in fee simple by Council and although shown as road in the District Plan have no zoning at all.

At the moment neither the site of the proposed plan change nor the adjoining DoC Reserve to the north are used for formal recreational purposes or offer any recreational opportunities, neither having any formal tracks or facilities. An informal track across site a. seems not to be used anymore and appears to be completely overgrown.

While the actual development of the sites is not subject of the proposed plan change the wish of the community to establish a useable and accessible recreation area which was expressed throughout the different phases of consultation has been taken into account and the indicative subdivision plan provided as part of the plan change documents shows that there is the opportunity to develop access to the Recreation Reserve immediately to the north of the sites and to provide a short walking/biking trail along with a picnic area, viewing points and a small ‘adventure playground’ within that reserve.

Zoning the plan change sites as General Recreation Activity Area would provide the opportunity to develop the sites for a play area but would have to include extensive safety fencing and removal of vegetation. Overall the Assessment of Open Space and Visual Amenity comes to the conclusion that the impact on the provision of informal recreation by zoning the sites General Recreation is likely to be low due to the number of other existing reserves in the area. Apart from Draper Reserve most of these parks and reserves provide parking and have accessible areas (see “Response to Submissions on Open Space and Visual Amenity”, pages 15+16).

The submitter is correct when quoting Council’s Reserves Strategic Directions which finds that the Western Hills is the only Landscape Identity Area “without any active recreation for its residents and has the least amount of conservation reserve area”. The main reason for the lack of active recreation facilities (like sports grounds and sports facilities) is the steep topography of the Western Hills which makes this area unsuitable for sports fields. The plan change site would not be suitable for the introduction of active recreation due to its size and layout and would therefore not bring any relief to this problem if zoned General Recreation.

It would most likely be developed for some form of passive recreation - the Reserve Strategic Directions also identifies the Western Hill as the area with the second highest area available in terms of passive recreation.

Regarding the amount of conservation reserve area in the Western Hills it needs to be explained that the Reserve Strategic Directions only included Council owned land. Due to that fact the Belmont Regional Park (mostly owned by Greater Wellington Regional Council) was excluded from the Strategic Directions. When including the Belmont Regional Park the Western Hills has clearly no lack of conservation reserves.

#### Impact of peri-urban and piecemeal development on communities

Western Hill suburbs have been developed gradually over an extended period of years. All of the surrounding residential areas are zoned General Residential under the District Plan. Though most of the surrounding lots are larger than the minimum lot size allowed for in the District plan there are several examples of existing lots in the area with a size ranging from 450m<sup>2</sup> to 550m<sup>2</sup>.

It is important to keep in mind that the subdivision plan shown in the plan change document is just an indicative plan reflecting the site development parameters of the District Plan. The plan is presented as no more than an example of how the land might be developed and there could well be other feasible means of subdividing the land. This plan change does not determine the actual pattern or shape of any future subdivision, it just determines the parameters and framework for future residential development.

Any actual subdivision plan would be subject to the requirements of Chapter 11 – Subdivision of the District Plan. Under Chapter 11 any subdivision in a General Residential Activity Area is a controlled activity. This means that any subdivision needs resource consent and that resource consent must be granted if the subdivision complies with all standards and terms specified in the chapter. The standards and terms outlined in the subdivision chapter include but are not limited to the following subjects: allotment design, access, stormwater, wastewater, earthworks. As soon as the subdivision does not comply with any of the standards and terms it becomes either a restricted discretionary activity or a fully discretionary activity. As a result of the very limited quantity of permitted earthworks with a maximum volume of 50m<sup>3</sup> per site, it is most likely that any subdivision application in this area would become a restricted discretionary activity.

It is agreed that the zoning of the plan change sites as General Residential Activity Area and any resulting residential development would change the appearance of the site and result in at least partial removal of vegetation. Nevertheless the District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City and to make sure that any development fits into the area and has no adverse affects. The main objectives for General Residential Activity Areas with relevance to this plan change are:

#### *4A 1.1.1 Residential Character and Amenity Values*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City; and*

#### *4A 1.2.1 Building Height, Scale, Intensity and Location*

*To avoid remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

To achieve these objectives the District Plan has established several policies such as

*4A 1.1.1 Residential Character and Amenity Values*

- (c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.*
- (d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.*
- (e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.*
- (f) That the clearance of vegetation be managed to avoid, remedy or mitigate any adverse effects on the intrinsic values of ecosystems.*

*4A 1.2.1 Building Height, Scale, Intensity and Location*

- (a) To establish a minimum net site area and maximum site coverage requirement to ensure medium density development is achieved.*
- (c) To ensure all new development is of a height and scale, which is compatible with surrounding residential development.*
- (e) To manage the siting of all buildings so as to minimise detracting from the character and visual attractiveness of the surrounding residential activity area.*
- (f) To manage the siting of all buildings so as to minimise detracting from the amenities of adjoining properties.*

These objectives and policies result in a set of rules which aim at retaining the amenity values and achieving the objectives outlined before including (but not limited to) a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and limitations regarding the removal of vegetation. The proposed zoning as General Residential Activity is considered to be in keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties.

Ecological value

Although the Assessment of Open Space and Visual Amenity covers some ecological aspects it is agreed that it can't replace a full ecological assessment. Therefore an independent ecological assessment of the site and the potential zoning as General Residential Activity Area under the District Plan has been commissioned by Council.

The assessment comes to the conclusion that the site has some ecological value as animal habitat and therefore the loss of the site would have some adverse ecological effects. However the habitat and the other ecological values of the site are low because of its small size, poor conditions, the likelihood of succession to vegetation that is not representative of forest in the area and vulnerability to edge effects. Therefore even the total loss of vegetation if it were rezoned for residential development would represent only a minor adverse ecological effect (see Appendix 2).

Meeting Reserves Key Directions

Consolidation of existing reserve network:

As mentioned above the plan change site does not meet the heritage criteria outlined in the Council's Reserve Land Acquisition/Disposal Policy and Guidelines (Registration under the Historic Places Act) and therefore the sites have a low level of heritage significance.

Environmental enhancement

Open space and vegetation corridors are provided for in this area and therefore the loss of small area of vegetation such as Poto Road Corner is unlikely to have an impact on biodiversity of Normandale Area or detract from any existing ecological corridors. The area

itself is small with large edge area and small interior and would therefore be unlikely to sustain ecological integrity if left alone.

#### Recreational access

Developing recreational tracks on the site would not contribute greatly to the wider track network of the Western Hills as any tracks would not link to existing tracks in the network, as is the aim of the Reserves Strategic Directions. Developing tracks in conjunction with the neighbouring Recreation Reserve would provide a greater area for track development, but this would also be limited as the Recreation Reserve also does not connect to any further land areas in the reserve network. Zoning the land General Residential would not prevent pedestrian through access (which formerly existed over the site) from being developed as shown in the indicative subdivision plan.

#### Strengthening community relationship

The Recreation Reserve immediately to the north of the sites is not currently developed as a reserve for recreation. While there is currently no easy access to the reserve, there is opportunity to develop a short access track through the reserve for local resident walking, viewing and picnicking, and a small 'adventure playground' among the trees, as shown in the Indicative Development Plan and the local community could be involved in the planning and realisation of this recreational facility.

#### Meeting the Reserve Land Acquisition/Disposal Policy and Guidelines

##### Landscape-Visual

The sites form part of a ridgeline running from near the end of Wilson Grove to the beginning of Panorama Grove. This ridgeline has been developed for residential purposes as the suburb of Normandale has grown and an open green ridgeline no longer remains. Rather, residential properties appear to be nestled into the surrounding bush. This is the view from parts of the valley floor such as from Woburn Road, where the site is viewed with the regenerating green escarpment of Jubilee Park in the foreground. The sites are separated from this green area by housing along the ridgeline, periodically broken by vegetation on private properties. Extending the residential zone further up the ridgeline would fit with the existing pattern of development in the 'Western Hills Identity Area', where residential properties are generally situated on ridgelines, with regenerating gullies and escarpments maintained as reserve land. The Recreation Reserve to the north of the sites would remain as a green hilltop, preserving the highest and therefore most prominent point of the ridge as green open space.

##### Landscape-Open space

As mentioned before it is considered that although the zoning of the plan change sites as General Residential Activity Area and any resulting residential development would change the appearance of the site and result in at least partial removal of vegetation the District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City and to make sure that any development fits into the area and has no adverse affects. Furthermore the retention of some of the vegetation would mitigate some of the visual effects of a subdivision and development of the site and any actual subdivision plan would be subject to the requirements of Chapter 11 – Subdivision of the District Plan.

#### Landscape-Natural site features & Ecological

An ecological assessment commissioned by Council to address concerns raised by submitters during the plan change process comes to the conclusion that the site has some ecological value as animal habitat and therefore the loss of the site would have some adverse ecological effects. However the habitat and the other ecological values of the site are low because of its small size, poor conditions, the likelihood of succession to vegetation that is not representation of forest in the area and vulnerability to edge effects. Therefore even the total loss of vegetation if it were rezoned for residential development would represent only a minor adverse ecological effect.

#### Recreation-Informal

Zoning the plan change sites as General Recreation Activity Area would provide the opportunity to develop the sites for a play area but would have to include extensive safety fencing and removal of vegetation. Overall the Assessment of Open Space and Visual Amenity comes to the conclusion that the impact on the provision of informal recreation by zoning the sites General Recreation is likely to be low due to the number of other existing reserves in the area. Due to the small size, the lack of flat land and the proximity to the road the sites would be unsuitable for development for active recreation.

#### Heritage

As mentioned above the plan change site does not meet the heritage criteria outlined in the Council's Reserve Land Acquisition/Disposal Policy and Guidelines (Registration under the Historic Places Act) and therefore the sites have a low level of heritage significance. Furthermore neither the school building itself nor the original school site is protected under the District Plan or listed by the New Zealand Historic Places Trust. Though it is recognised that the old school building is of heritage value to the local community it needs to be acknowledged that the original school site has been subdivided several times and parts of it have gone through a couple of different uses and zonings (including being leased out for grazing and zoning as legal road).

#### Maintaining Normandale's character

The sites form part of a ridgeline running from near the end of Wilson Grove to the beginning of Panorama Grove. This ridgeline has been developed for residential purposes as the suburb of Normandale has grown. All of the surrounding residential areas of Normandale are zoned General Residential under the District Plan. Though most of the surrounding lots are larger than the minimum lot size allowed for in the District Plan there are several examples of existing lots in the area with a size ranging from 450m<sup>2</sup> to 550m<sup>2</sup>. It needs to be emphasised that the 400m<sup>2</sup> net site area for general residential activities provided under the District plan is a minimum size and that there are plenty of circumstances that might prevent the site from being developed to this extent. As mentioned earlier any actual subdivision plan would also need to comply with the requirements of Chapter 11 – Subdivision of the District Plan. This means that any subdivision needs resource consent and that resource consent must be granted if the subdivision complies with all standards and terms specified in the chapter. The standards and terms outlined in the subdivision chapter include but are not limited to the following subjects: allotment design, access, stormwater, wastewater, earthworks. As soon as the subdivision does not comply with any of the standards and terms it becomes either a restricted discretionary activity or a fully discretionary activity. As a result of the very limited

quantity of permitted earthworks with a maximum volume of 50m<sup>3</sup> per site, it is most likely that any subdivision application in this area would become a restricted discretionary activity.

It is considered that extending the general residential zone further up the ridgeline would fit with the existing pattern of development in the 'Western Hills Identity Area', where residential properties are generally situated on ridgelines, with regenerating gullies and escarpments maintained as reserve land. The Recreation Reserve to the north of the sites would remain as a green hilltop, preserving the highest and therefore most prominent point of the ridge as green open space.

The proposed zoning as General Residential Activity is considered to be in keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties. Those of most relevance are 'to maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City' (Objective 4A 1.1.1 Residential Character and Amenity Values) and 'to avoid, remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area' (Objective 4A 1.2.1 Building Height, Scale, Intensity and Location). The Proposed Plan Change is considered to be the most appropriate option for achieving these objectives and therefore not therefore not considered to be in breach of Section 84 of the Resource Management Act 1991.

### **Recommendation**

It is recommended that the submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged and the land be zoned General Residential Activity Area.

The classification of the land as a recreation reserve subject to the Reserves Act 1977 does not fall within the scope of this plan change. Nevertheless it needs to be recognised that the zoning of the land as General Residential Activity Area would consequently disqualify the land from being classified as a reserve.

#### *Further Submission:*

#### ***DPP12-5-15-011 – Lower Hutt Historical Society – 11.1 - Support***

#### **Purpose of Further Submission:**

The further submitter supports the submission of Normandale Residents Association (submission reference 7.1) and requests to retain the zoning as "General Recreation Activity Area" as a Reserve.

#### **Specific Comments**

The further submitter supports the Residents Association's request because of the historic significance of the area and endorses their submission to see the re-integration of the land at Poto Road corner with the Department of Conservation land which would also effectively reinstate the almost 100 year old school site because this in itself is of historical significance to Normandale and Lower Hutt City.

#### **Discussion**

Please refer to discussion above (submission 7.1 by Normandale Residents Association).

## **Recommendation**

It is recommended that the further submission lodged by Lower Hutt Historical Society be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

### **DPP12-5-15-012 - Grant Hector Roberts – 12.1 - Support**

#### **Purpose of Further Submission:**

The further submitter supports the submission of Normandale Residents Association and requests that the submission be allowed in its entirety.

#### **Specific Comments**

The further submitter argues that the site at Poto Road is an element of the essential character of Normandale and of the Western Hills in general and that it is part of the history and heritage of Normandale. He lists existing intrinsic and amenity values (Green Backdrop, Natural Skyline, Ecological Importance, Wildlife Corridor and Recreational Amenity) and points out that the indicative development (or any other development) would compromise the existing DoC-owned Reserve in several ways (impact on views, biodiversity, erosion, rubbish dumping, groundwater conditions etc).

The further Submitter then refers to the heritage value of the site for it was part of Normandale's original School Reserve and argues that when the new Normandale School was established it was agreed that in exchange for the new school being built on reserve land the old school site would be made reserve.

The further submitter states that the development provided for by the plan change would have damaging effects, one of them being to obscure the view from the hilltop.

#### **Discussion**

Please refer to discussion above (submission 7.1 by Normandale Residents Association).

#### **Recommendation**

It is recommended that the further submission lodged by Grant Hector Roberts be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

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Submission:

### **DPP12-5-13-008 – Wellington Tenths Trust – 8.1**

#### **Request of Submitter**

The submitter supports the Proposed Plan Change

#### **Specific Comments**

The submitter states that the land Hutt City proposes to re-zone is in Council ownership and therefore outside of the Settlement process but nonetheless it is within the rohe of Settlement Trust and Wellington Tenths Trust.

#### **Discussion**

With respect to Section 8 of the RMA, the principles of the Treaty of Waitangi have been taken into account and local iwi were consulted on this matter early in the land review process.

It is considered that the zoning of the site as general residential will allow the site to be developed in an appropriate and efficient manner. The General Residential Activity Area zoning is therefore considered appropriate given the size, character and location of the site in relation to other General Residential Activity Area land.

#### **Recommendation**

It is recommended that the submission lodged by Wellington Tenth Trust be **accepted** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

#### **DPP12-5-15-013 - Normandale Residents Association - 13.3 - Opposition**

#### **Purpose of Further Submission:**

The further submitter opposes the submission of Wellington Tenth Trust.

#### **Specific Comments**

The further submitter is in disagreement with the following argument raised in the submission mentioned above:

- The need for “new housing”.

#### **Discussion**

Please refer to discussion above (submission 8.1 by Wellington Tenth Trust).

#### **Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

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Submission:

#### **DPP12-5-13-009 – Melvin Galletly – 9.1**

#### **Request of Submitter**

The submitter requests Council to reconsider the zoning and evaluate best options for the site in its entirety

#### **Specific Comments**

The submitter suggests that Hutt City Council swaps land with the Department of Conservation to achieve a more flexible utilisation of site and put the decision making process on hold until this consultation is fully explored. The submitter then proposes two alternative options for the development of the site which consider the site design-development in its entirety and present a compromise. Both options suggest a 5 lot development as well as playgrounds, picnic areas and lookouts and would necessitate the swapping of DoC reserve land for HCC land.



The submitter then addresses his concerns about numbers of children enrolled with Normandale Primary School and argues that the development of additional residential building site could attract young couples and families and therewith help to maintain or increase the number of students.

## **Discussion**

It is considered that the zoning of the site as general residential will allow the site to be developed in an appropriate efficient manner. The site is presently un-used and the use for which it was acquired (roading) is no longer considered necessary. The assessments commissioned by Council as part of the process confirm that the rezoning of the land will not have any significant adverse effects on the environment. The General Residential Activity Area zoning is therefore considered appropriate given the size, character and location of the site in relation to other General Residential Activity Area land.

The District Plan provides a range of objectives, policies and rules to protect the residential character and the amenity values of General Residential Activity Areas throughout the City. The main objectives for General Residential Activity Areas with relevance to this plan change are:

### *4A 1.1.1 Residential Character and Amenity Values*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City; and*

### *4A 1.2.1 Building Height, Scale, Intensity and Location*

*To avoid remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

To achieve these objectives the District Plan has established several policies such as

### *4A 1.1.1 Residential Character and Amenity Values*

- (c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.*
- (d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.*
- (e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.*
- (f) That the clearance of vegetation be managed to avoid, remedy or mitigate any adverse effects on the intrinsic values of ecosystems.*

### *4A 1.2.1 Building Height, Scale, Intensity and Location*

- (a) To establish a minimum net site area and maximum site coverage requirement to ensure medium density development is achieved.*
- (c) To ensure all new development is of a height and scale, which is compatible with surrounding residential development.*
- (e) To manage the siting of all buildings so as to minimise detracting from the character and visual attractiveness of the surrounding residential activity area.*
- (f) To manage the siting of all buildings so as to minimise detracting from the amenities of adjoining properties.*

These objectives and policies result in a set of rules which aim at retaining the amenity values and achieving the objectives outlined before including (but not limited to) a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and limitations regarding the removal of vegetation. The proposed zoning as General Residential Activity is considered to be in

keeping with the objectives specific to this activity area of the District Plan, and therefore the objectives sought for the surrounding residential properties.

It is important to keep in mind that the subdivision plan shown in the plan change document is just an indicative plan reflecting the site development parameters of the District Plan. The plan change does not determine the actual pattern or shape of any future subdivision, it just determines the parameters and framework for future residential development.

Any actual subdivision plan would be subject to the requirements of Chapter 11 – Subdivision of the District Plan. Under Chapter 11 any subdivision in a General Residential Activity Area is a controlled activity. This means that any subdivision needs resource consent and that resource consent must be granted if the subdivision complies with all standards and terms specified in the chapter. The standards and terms outlined in the subdivision chapter include but are not limited to the following subjects: allotment design, access, stormwater, wastewater, earthworks. As soon as the subdivision does not comply with any of the standards and terms it becomes either a restricted discretionary activity or a fully discretionary activity. As a result of the very limited quantity of permitted earthworks with a maximum volume of 50m<sup>3</sup> per site, it is most likely that any subdivision application in this area would become a restricted discretionary activity.

The attached indicative 7 lot subdivision plan demonstrates that the site can be subdivided in a way that does not affect the driveway/access to the Normandale Playcentre but would create the opportunity for additional carparking for the playcentre off the existing driveway. A Traffic Assessment undertaken by Barclay Traffic Planning comes to the conclusion that the land can be feasibly developed as shown in the indicative subdivision plan with access from the southern boundary and that this access can be expected to operate safely.

The realisation of the recommendation of the submitter to swap some Doc land for HCC land to achieve a more flexible utilisation of the site appears unlikely to be successful. In the past Council has considered the option of a land swap (initiated by local residents) and approached the Department of Conservation to discuss this option but did not find any support. The Department of Conservation looked at the matter on two occasions and declined. To reinstate this process would create reasonable additional administrative costs (e.g. negotiation with Department of Conservation, additional assessments and expert's advice, legal advice, costs for surveying etc.) with only very limited chance of success. The advantages of the alternative options presented as part of the submission appear to be minor and outweighed by a number of disadvantages apart from additional administrative costs.

The options presented by the submitter would interfere with an established reserve while the proposed plan change only affects land currently held as road reserve where ecological values are not particularly high. The two alternative designs both appear to be creating residential areas similar in size to the actual plan change area, so there would be no real compromise regarding the size but only regarding the location of development. Both alternative options include the building of at least one additional road to provide access to the newly created reserve, while Option B suggests the addition of another road to create access to the proposed residential development separate from the Normandale Playcentre driveway.

Overall both options would create high additional costs for building legal roads to access the residential development as well as the reserve, and land currently protected and zoned as reserve would need to be used for road.

The concerns raised by the submitter over the small number of children enrolled with Normandale Primary School and an overall ageing population would be addressed by creating new potential for residential development through the plan change.

#### **Recommendation**

It is recommended that the submission lodged by Melvin Galletly be **partially accepted** to the extent that Council has obtained further expert's advice regarding the best options for the site and **partially rejected** to the extent that the plan change process be pursued and the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### ***DPP12-5-15-013 - Normandale Residents Association – 13.2 – Opposition***

#### **Purpose of Further Submission:**

The further submitter opposes the submission of Melvin Galletly.

#### **Discussion**

Please refer to discussion above (submission 9.1 by Melvin Galletly).

#### **Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### ***DPP12-5-15-014 – Normandale Playcentre – 14.1 - Opposition***

#### **Purpose of Further Submission:**

The further submitter opposes the submission of Melvin Galletly and seeks that the development plans provided in Mr Galletly's submission be disallowed.

#### **Specific Comments**

The further submitter declares that they wish to retain and maintain exclusive use of their driveway and is therefore opposed to any suggestions of shared access and housing along the driveway. The primary concerns for the further submitter are the safety of the children, the availability of parking for their members, potential damage to the driveway and the increase of vehicular traffic in general as a result of the introduction of any housing. Furthermore the further submitter reinforces their opposition to any residential and support for the retention/development of a recreation reserve.

#### **Discussion**

Please refer to discussion above (submission 9.1 by Melvin Galletly).

## Recommendation

It is recommended that the further submission lodged by Normandale Playcentre be **accepted** to the extent that the development plans presented by Melvin Galletly are not relevant to the proposed plan change process.

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Submission:

**DPP12-5-13-010 – Leanne Killalea – 10.1**

### Request of Submitter

The submitter requests Council to reconsider the proposal and seeks that the area remains as green space in perpetuity.

### Specific Comments

The submitter objects the Proposed Plan Change because of the increased disturbance of:

- Neighbourhood including young children attending the Playcentre;
- Local flora and fauna;
- Environment and aesthetics;
- Traffic.

Furthermore the submitter points out that local history in this area never included residential activity, that the developments should concentrate on surrounding suburbs where development of subdivisions and residential zones is occurring and ongoing and disturbance is focused and ongoing and that increased traffic and disturbance with development will affect all local users. The submitter mentions the high biodiversity on the site as a result of the site being undisturbed for 15 to 20 years and the significance of the site as a link/corridor between rural areas. Finally the submitter raises her concerns over increased water runoff and potential flooding in catchment areas as a potential result of removal of vegetation and cutting into hillside.

### Discussion

#### Traffic

As a result of concerns raised by the Normandale Playcentre during earlier consultation regarding their driveway and the possibility of the driveway being used as access to the residential development a new indicative subdivision plan has been developed. This adapted indicative subdivision plan (that is attached to the proposed plan change document) moved the access to the southern boundary of the plan change site. A traffic assessment undertaken by Barclay Traffic Consulting comes to the conclusion that the land can be feasibly developed as shown in the indicative layout with satisfactory visibility characteristics and that there could be other layouts which could also be considered. Overall the assessment confirms that access to a potential development from the southern boundary could be achieved in a feasible and safe way. The Traffic Assessment also comes to the conclusion that the additional traffic that will be generated can easily be accommodated on Poto Road and the roading network and that no significant adverse effects on road safety are expected.

### History

As outlined in the introduction the site of the plan change was first zoned residential (1964 – City of Lower Hutt District Scheme), then general residential with an indication of a future road (1978 – First Review of the District Scheme), then as proposed road (1983 – Second Review of the District Scheme) and finally as road (1995 – Proposed District Plan).

Both sites were acquired by Council in 1983 for road or in connection with road under the Public Works Act 1981 which clearly shows the intention to use the land as road not as reserve/recreation.

### Ecology/Flora&Fauna

An ecological assessment commissioned by Council to address concerns raised by submitters during the plan change process comes to the conclusion that the site has some ecological value as animal habitat and therefore the loss of the site would have some adverse ecological effects. However the habitat and the other ecological values of the site are low because of its small size, poor conditions, the likelihood of succession to vegetation that is not representation of forest in the area and vulnerability to edge effects. Therefore even the total loss of vegetation if it were rezoned for residential development would represent a minor adverse ecological effect.

### Environment/Aesthetics

The Assessment of Open Space and Visual Amenity carried out by PAOS Ltd. finds that zoning as residential would be appropriate and that extending the residential zone further up the ridgeline would fit with the existing pattern of development in the ‘Western Hills Identity Area’, where residential properties are generally situated on ridgelines, with regenerating gullies and escarpments maintained as reserve land.

It is agreed that zoning of the sites as General Recreation will alter the visual amenity of the area, still it is considered that the type of development allowable under a General Residential zoning is appropriate in the context of the existing residential character and urban form of Normandale and the Western Hills. The Assessment finds that further steps to mitigate the effects of residential development may be appropriate, such as the development of lot sizes larger than the minimum allowable under the District Plan to allow retention of vegetation between houses, continuing the appearance of houses nestled in the surrounding bush.

If zoned as General Residential Activity Area under the District Plan this zoning would allow for a minimum lot size of 400m<sup>2</sup>, a maximum site coverage of 35% and there would be restrictions regarding the removal of vegetation and earthworks. It also needs to be kept in mind that any future subdivision of the sites would need to apply for resource consent and as part of the resource consent process the applicant would most likely be asked to provide full ecological and geotechnical assessments. The subdivision chapter of the District Plan requires that all allotments must be able to contain a rectangle measuring 10m by 15m and that such rectangle must be clear of any yard or right of way and have a suitable building platform. Furthermore there are provisions in the District Plan restricting the permitted amount of earthworks and the removal of vegetation. All these factors will influence the design and actual lot size of any future residential development.

### Infrastructure

A first expert’s assessment of the existing infrastructure, commissioned as part of the plan change process (‘Assessment of the impact of indicated subdivision on the existing services

in Poto Road' by GHD Ltd.), has shown that the expected increased stormwater runoff should be covered by the existing stormwater pipes. Apart from that, any future subdivision would have to go through the process of applying for resource consent and as part of this process the issue of water, stormwater etc. would need to be addressed and solved.

In accordance with the relevant regional policy statements and regional strategies the general focus within Hutt City Council is on infill housing to achieve an integrated sustainable management of the region's natural and physical resources and avoid further spreading of urban development outside of existing urban areas. The zoning is therefore consistent with the basic principle of making efficient use of land and the infrastructure already in place.

### **Recommendation**

It is recommended that the submission lodged by Leanne Killalea be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

#### *Further Submission:*

#### **DPP12-5-15-012 - Grant Hector Roberts – 12.1 - Support**

#### **Purpose of Further Submission:**

The further submitter supports the submission of Leanne Killalea and requests that the submission be allowed in their entirety.

#### **Specific Comments**

The further submitter argues that the site at Poto Road is an element of the essential character of Normandale and of the Western Hills in general and that it is part of the history and heritage of Normandale. He lists existing intrinsic and amenity values (Green Backdrop, Natural Skyline, Ecological Importance, Wildlife Corridor and Recreational Amenity) and points out that the indicative development (or any other development) would compromise the existing DoC-owned Reserve in several ways (impact on views, biodiversity, erosion, rubbish dumping, groundwater conditions etc).

The further Submitter then refers to the heritage value of the site for it was part of Normandale's original School Reserve and argues that when the new Normandale School was established it was agreed that in exchange for the new school being built on reserve land the old school site would be made reserve.

The further submitter states that the development provided for by the plan change would have damaging effects, one of them being to obscure the view from the hilltop.

#### **Discussion**

Please refer to discussion above (submission 10.1 by Leanne Killalea).

#### **Recommendation**

It is recommended that the further submission lodged by Grant Hector Roberts be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.

*Further Submission:*

**DPP12-5-15-013 - Normandale Residents Association – 13.1 - Support**

**Purpose of Further Submission:**

The further submitter supports in whole the submission of Leanne Killalea and agrees with all the arguments put forward.

**Specific Comments**

The further submitter declares that he is in agreement with the following arguments raised in the submission:

- Historically the land was designated for recreational use;
- Protection and preservation of the biodiversity; flora and fauna; and “green area”;
- Lack of traffic assessment;
- Lack of stormwater assessment.

**Discussion**

Please refer to discussion above (submission 10.1 by Leanne Killalea).

**Recommendation**

It is recommended that the further submission lodged by Normandale Residents Association be **rejected** to the extent that the provisions of Proposed Plan Change 15 remain unchanged.





**Appendix 1:**  
**Traffic Assessment**  
**Barclay Traffic Planning, Mr. Bill Barclay**





## Barclay Traffic Planning

1st Floor , 72 Queens Drive - P.O.Box 31531 - Lower Hutt 5040  
Phone: 04-939 0823 Fax: 04-939 3546 Email: barclay@barclaytraffic.co.nz  
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2 August 2010

Ms Corinna Tessendorf  
Senior Policy Analyst  
Hutt City Council  
Private Bag 31912  
LOWER HUTT 5040

Dear Ms Tessendorf

### PROPOSED PLAN CHANGE 15: TRAFFIC ASSESSMENT

As arranged I have considered traffic implications of the proposed plan change, and report as follows.

1. Background

On 2 February 2010 Hutt City Council (HCC) notified Proposed Plan Change No. 15 which provides for two properties on Poto Road, Normandale, to be included in General Residential Activity Area of the District Plan. One of the lots is held in fee simple, the other was formerly road but I understand is now in fee simple. The properties are currently shown as having legal road status, with no land use zoning.

If the plan change is confirmed, the land will be made available for subdivision and sale.

Submissions on the plan change have now closed, with ten initial submissions and four further submissions being received.

2. Scope

This assessment considers traffic matters relevant to the plan change evaluation under Section 32 of the Resource Management Act 1991 (RMA), in particular the ability to form safe access to and from lots in possible subdivision of the two properties.

3. Description

At present the two properties which are the subject of the plan change are undeveloped. It is enclosed on two sides by Poto Road.

Poto Road is approximately 8.0 metres between kerbs, and is subject to a parking prohibition on the northern side. The speed limit is 50 km/h. Poto Road is classified as a Local Distributor Road in the District Plan roading hierarchy, indicating that the predominant function is to provide for through traffic.

Plan change documents include an indicative subdivision proposal prepared by Tonkin and Taylor (Drawing 84909.003-01, Revision 3). The plan shows seven residential lots, all of which obtain access from Poto Road at two separate points. In addition to vehicular accesses, a pedestrian walkway across the lots is shown.

It needs to be emphasised that the plan is presented as no more than an example of how the land might be developed. There could well be other feasible means of subdividing the land.

4. Access safety

The Tonkin plan shows two access points, one at the western end of the Poto Road frontage serving Proposed Lot 1, the other a right of way near the eastern end of the frontage for the other six (Proposed Lots 2-7).

If the two accesses are to operate safely, it is important for them to have adequate visibility. District Plan rules do not set minimum sight distances for residential driveways, but do require “... *vehicular access to new developments from the public street network shall be located and designed in such a way as to ensure convenient and safe movement to and from the site with minimal interference to other traffic, to pedestrians and to on street parked vehicles*” (from Rule 14A(ii)2.1(a)).

In determining whether adequate sight distances are available, recognised references include *RTS 6: Guidelines for Visibility at Driveways* (Land Transport Safety Authority, 1993) and Australian / New Zealand Standard 2890.1 *Parking Facilities Part 1: Off-street Car Parking* (Standards Australia and Standards New Zealand, 2004).

Table 1 below compares measured sight lines against recommended minimum sight distances in the two documents. The assessment is based on an operating speed of 50 km/h and recognises Poto Road’s hierarchy status of Local Distributor Road, equivalent to Collector Road status in RTS 6. For AS/NZS 2890.1, the Lot 1 access serves fewer than three potential households and can therefore be treated as a Domestic property access.

Sight line	RTS 6 (m)	AS/NZS 2890.1 (m)	Measured (m)
Access to Proposed Lot 1			
Sight line to west	45	40	76
Sight line to east	45	40	45
Access to Proposed Lots 2-7			
Sight line to west	45	45	75
Sight line to east	45	45	43

**Table 1: Sight distance assessment**

Sight distances meet recommended minimums in all cases except for the sight line to the east from the proposed right of way. For this the available visibility is 43 metres instead of the recommended 45. I note however that traffic approaching from this direction will be constrained by a tight curve to speeds well below 50 km/h, and will be on the opposite side of the road to the access. In addition the uphill grade will reduce stopping distances slightly. For these reasons I believe the small shortfall in meeting the recommendations can be accepted. The accesses can be expected to operate safely.

5. Road safety

I have checked the New Zealand Transport Agency crash database for the ten-year period 2000-2009, finding that no crashes are recorded on Poto Road between Normandale Road and Pokohiwi Road. While there could well be minor accidents which have not been reported, the database provides no evidence of an existing safety problem. Parts of Poto and Normandale Roads have been reconstructed in recent years, and while they do not meet HCC design standards in every respect they have what I consider to be good safety characteristics.

I believe there can be confidence that the accesses will function safely.

6. Traffic generation

At present the subject land is undeveloped, generating little or no traffic.

Residential properties typically generate between five and ten vehicle movements per day per household. Once the land is developed with up to seven dwellings, generation of between 35 and 70 movements per day can be expected. This compares with traffic flows in the order of perhaps 1,000 to 2,000 veh/day on Poto Road. The additional traffic will add little to total flows, which will remain well within the capacity of Poto Road. Once on Poto Road traffic is able to use Normandale Road, Pokohiwi Road, Miromiro Road or Dowse Drive as it accesses the wider network.

I have no concerns about effects of potential additional traffic.

7. Access standards

Both accesses are considerably more than 8.0 metres away from the nearest intersections and therefore comply with District Plan separation requirements.

As accesses do not cross a footpath, District Plan requirements in relation to width or number do not apply.

8. Conclusion

In my opinion the subject land can be feasibly developed as shown in the Tonkin indicative layout with satisfactory visibility characteristics. There could well be other layouts which could also be considered.

Some additional traffic will be generated but it can be easily accommodated on Poto Road and the roading network.

The crash record provides no evidence of an existing safety problem. I would not expect a significant adverse effect on road safety.

Yours faithfully



Bill Barclay

c:\data\jobs\j454\j454002.docx



**Appendix 2:**  
**Ecological Assessment**  
**Blaschke and Rutherford Environment and Ecology Consultants,**  
**Dr. Paul Blaschke**





**Proposed Plan Change 15**  
**Ecological Assessment for unzoned land at Poto Road,**  
**Normandale, Lower Hutt**

**Report for Hutt City Council**

**August 2010**

**Introduction**

1. Hutt City Council (HCC) has proposed a Plan Change in respect of currently unzoned land close to Poto Road, Normandale.
2. In its original assessment, HCC suggested that the land concerned had “no particular ecological value”. However, submissions to the proposed plan change have suggested that the land may have ecological values and that these ecological values should be documented and assessed.
3. According, HCC asked me (7 July 2010) to carry out an assessment of possible ecological effects of rezoning of land at Poto Road (the site) for residential use, as part of the plan change process.
4. To this end I have examined relevant documents, including:
  - o Plan Change application and section 32 report, including assessment of open space and visual amenity by PAOS Ltd (December 2009)
  - o Submissions on the notified plan change that dealt with ecological matters, notably that of the Normandale Residents Association
  - o Aerial photos of the site and surrounding areas, and various unpublished reports and field notes from parts of Hutt City.
5. I made a site inspection on 29<sup>th</sup> July, 2010, crossing the site twice, and examining it from around its road boundary. I also examined the neighbouring Department of Conservation recreation reserve and other nearby bush reserves. I was accompanied on my inspection by my colleague Ms Frances Forsyth.
6. This assessment is made in the context of my general knowledge of the vegetation of Hutt City, the Western Hutt hills and the Belmont Regional Park.

**Site description**

7. The general features of the site have been fully described in other documentation of the site, and in submissions to the proposed Plan Change, and here I will only summarise the features that are relevant to the ecological assessment.
8. The site is about 4000m<sup>2</sup> in area and sits over a rounded spur above Poto Road, Normandale, within the generally southeast-facing hill and gully landforms of the Western Hutt Hills. There are few remaining stream sections within these landforms.
9. Most of the area is zoned as General Residential and used for suburban residences. HCC staff provided me with a list and map of 172 Lots on five roads in the vicinity of Poto Street.

Excluding the 5% of smallest and largest lots, the size of these residential lots ranges from 245-2119m<sup>2</sup>, with an average size of 948m<sup>2</sup> and a median size of 847m<sup>2</sup>.

10. Bordering the lots subject to the proposed Plan Change is a Department of Conservation reserve which is approximately 6600m<sup>2</sup> in area. It is named as Poto Road Recreation Reserve in the Wellington Conservation Management Strategy, and described as “park beside playcentre” but otherwise undocumented.
11. Neither the HCC-owned land nor the DOC reserve appear to receive any active management. There are a number of small informal tracks cut through the area, including one leading to a survey mark, and several leading to small clearings in the bush.

## **Vegetation**

12. I would describe the vegetation on the subject lots as regenerating native scrub<sup>1</sup>, with emergent introduced trees. The vegetation is mainly 3-5m high, with lower shrub-dominated vegetation at the exposed edges of the site, and the occasional taller tree.
13. The vegetation canopy over the largest part of the area is dominated by mahoe, hangehange, kohuhu and tree ferns (mainly mamaku). The canopy is fairly continuous, in places over a sub-canopy of old (dead or senescent) gorse, which would have previously formed the canopy of the vegetation.
14. There are many flowering cherry trees emergent from the canopy, especially in the northeast part of the site (close to the kindergarten drive) and on the fringes of the site.
15. On the eastern end of the site (within the sharp bend on Poto Road) the vegetation is lower and probably younger, and compared to the rest of the site there is more gorse, fewer tree ferns and a number of emergent ngaio trees up to more than 6 meters high.
16. The understorey is generally dense, and there are prolific seedlings and young saplings in patches. The main understorey species are hangehange, rangiora, karamu, mapou, kanono, fivefinger, and *Pseudopanax* hybrids.
17. The main seedling and small sapling species I noted were hangehange, porokaiwhiri, karamu and montbretia.
18. There were many weedy species growing throughout the site, both as canopy and emergent species and as seedlings and small saplings. The most significant of these was flowering cherry, which is highly invasive and has the potential to dominate the entire canopy, and is also growing prolifically as seedlings. Some of the introduced species are non-Wellington New Zealand native species such as pohutukawa and *Pseudopanax* hybrids. Other weed species noted included ginger plant, gorse, ragwort, veldt grass, and wandering willie.
19. Some native species seen at the edges of the bush area are probably planted, such as kowhai, and possibly the fine specimen totara tree by the kindergarten.
20. I did not investigate vegetation succession in detail, nor examined old aerial photos. My observations suggest, however, that the vegetation on the site is typical of Western Hutt Hills bush regenerating from former pasture that has been abandoned from grazing and initially overgrown by gorse, and now slowly changing to bush that is somewhat more natural in character]. It is likely that most of the native vegetation on the site is not much more than 20 years old. However, the weed species present have the potential to dominate the vegetation on this site, as discussed below.
21. The submission of the Normandale Residents Association (NRA) describes the site in detail including a valuable description of the vegetation and fauna, together with species lists of

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<sup>1</sup> I define scrub as “Woody vegetation in which the cover of shrubs and trees in the canopy is > 80% and in which shrub cover exceeds that of trees”. Shrubs are woody plants less than 10 cm in diameter.

vegetation and birds. The submission lists a total of 37 vegetation species from the wider old Normandale School site (including the DOC reserve).

22. I did not attempt to replicate NRA species list, nor did I observe all the species listed in that list, but I would not expect to see all species on a single visit. I should note, however, that I did not see the large tree species totara or kohekohe in the canopy on the site, and it is possible that the totara referred to is a single large totara growing adjacent to the kindergarten building.
23. The NRA submission also includes notes on birds, reptiles and insects at and around the site, including a list of bird species. According to this list, a relatively wide range of bird species have been seen at and near the site, reflecting the proximity of the site to sizeable areas of mature forest in the Belmont Regional Park (the park boundary is less than one km away from the site).

### **Values of the Vegetation**

24. Neither my observations nor those of the NRA record any distinctive or threatened plant species present on the site. I confirm that the site is not part of any Significant Natural Resource Areas identified in the District Plan.
25. The vegetation is generally typical of early regenerating vegetation on the Western Hutt Hills. However the abundance of several of the weed and non-native species noted suggests that these species may dominate the vegetation in future, to the extent of it no longer being typical of indigenous forest of the area.
26. Flowering cherry is the most significant of these weed species. Other species which could dominate the stand in future include pines (from the DOC reserve), pohutukawa, and Pseudopanax hybrids. Weeds such as montbretia, wandering willie and flowering ginger also have the potential to increase in cover and become more of a nuisance in the site, as they are in some other places in the Wellington region and Western Hutt Hills.
27. In addition, the small size and shape of the site mean that it is particularly vulnerable to the “edge effect”. The edge effect is the greater adverse effects of wind, frost, weeds and other disturbances on the edges and exterior portions of a forest area compared to its more intact core. Generally, the significance of the edge effect increases as the size of the remnant decreases. In this case, no part of the site is free of a significant edge effect (in New Zealand five ha is often considered a size threshold below which forest ecological processes are dominated by the edge effect).
28. The combination of small size, the prevalence of introduced weeds which have the potential to dominate the stand, and the proximity of all parts of the reserve to the edge effect and human disturbance, leads me to conclude that the site is not ecologically significant. If left in its present state, as it matures over the next few decades it is likely to become dominated by species that are not typical or representative of forest of the area. In other words, its ecological significance will not increase over time.
29. The statement above does not mean that the site has no ecological values. Its main ecological value is as habitat for birds (and to a lesser extent, insects). This is confirmed by the NRA’s documentation of a relatively rich variety of native birds seen in the vicinity of the site, which is a consequence of the proximity of the site to other larger bush reserves in the suburb and in particular to the relatively large forest areas within the eastern edges of Belmont Regional Park.
30. On its own, however, the habitat value of the site would be low, because of its small size and few large trees. The habitat value of the site occurs as a relatively minor contribution to the matrix of open spaces including forest remnants, in the general area.

31. I consider that the habitat value of the site is general, i.e. as part of a matrix of vegetated areas in the suburb, rather than a specific value as a “stepping stone” within a defined corridor from Belmont Regional Park.
32. None of the bird species listed from the site in the NRA submission is rare or threatened, with the exception of the New Zealand falcon (*Falco novaeseelandiae*) which is regarded as Nationally Vulnerable<sup>2</sup>. However, the falcon is listed only as a species passing overhead.
33. I do not consider that the vegetated site has a significant beneficial effect on microclimate in the immediate neighbourhood, as suggested in the NRA submission. Other submissions mention the benefits of the vegetation for carbon storage. While vegetation contributes to carbon storage and can certainly have a beneficial effect on local climate and human comfort through wind shelter, shading, etc, the position of the vegetated site relative to all nearby houses<sup>3</sup> suggests to me that such effects would be insignificant. If there were positive effects such as shelter from wind, these would only partly be lost through loss of the current vegetation, as some shelter would also be provided by houses, garden trees, etc, that replaced this vegetation, while some carbon storage can be provided by planted vegetation.
34. The vegetation also undoubtedly has amenity values, as documented by the PAOS assessment of open space and visual amenity, and in the submissions on the plan change.

#### **Assessment of effects of re-zoning the land as General Residential**

35. The principal adverse ecological effect of re-zoning this land would be the loss of bird habitat resulting from any loss of vegetation that would be expected from clearance for residential development.
36. Not all vegetation would necessarily be cleared for residential development, as shown by the current pattern of residential use in the suburb, which retains a relatively well-vegetated character. However, I have assumed that if the site was developed to the maximum extent envisaged, i.e. seven lots, that the loss of vegetation would be more or less total and that any remaining fragments would be so small that they would have practically no ecological value. If fewer than seven lots were subdivided and developed, some of the remaining areas may retain some habitat values, particularly if they were on the edge of the DOC reserve.
37. I note that the average lot size under the indicative development plan is about 485m<sup>2</sup>, significantly less than the current average lot size in the vicinity, of about 900m<sup>2</sup>.
38. As stated above, the main ecological value of the site is as bird habitat. Therefore the critical question in regard to ecological effects of rezoning would be “If this vegetation is lost as a result of rezoning, would the total bird habitat of the Normandale area and the wider Western Hutt Hills be significantly decreased?”
39. In my opinion, the answer to this question would undoubtedly be “no”. The cumulative value that this site adds to the total habitat available for birds in the Western Hutt Hills would be very small. Even if the site is considered in addition to the neighbouring DOC reserve, the total size of the combined area is only approximately 1 ha, considerably smaller than the area normally regarded by New Zealand ecologists for a forest remnant to be viable and to offer significant habitat to native birds.
40. The topographic position of the site (i.e. a spur) makes it slightly more valuable than an equivalent-sized site within a gully, because on the Western Hutt Hills vegetated spurs are relatively scarcer than vegetated valley sites. However, the factors discussed above which

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<sup>2</sup> Kereru (*Hemiphaga novaeseelandiae*) has been regarded as threatened in the past but has been taken off the threatened list in the latest Department of Conservation evaluation.

<sup>3</sup> Except for the kindergarten building; but the shelter provided by vegetation for this building comes from the DOC reserve rather than the council-owned site.

lower the ecological condition and value of the site, mean that even as a spur site, the ecological habitat values are low.

41. The site not unique within Western Hutt Hills in being situated on a spur. For example there are several forested spur sites in the Tirohanga/Harbour View suburbs.
42. There are two potential ecological effects of re-zoning on the regenerating scrub and forest in the neighbouring DOC reserve forest. The first is the impact of weeds from new gardens established as a result of subdivision in the site; the second is an increased "edge effect" if there are cleared areas immediately adjacent to the DOC reserve.
43. I consider that these are both relatively minor adverse effects, mainly because the DOC reserve is also a very small site and appears to have low ecological values (although I did not assess this site specifically). I also note that most of the weed species seen on the site (current HCC land) are garden escapes, so that most of the garden weed species that I would expect in this area are already present.
44. Both these effects could be reduced by the creation of a vegetated buffer strip between the DOC reserve and any new subdivided lots on the current HCC land. A vegetated strip could be achieved by means of a boundary adjustment adding to the DOC reserve, or by covenants for vegetation protection placed adjacent to the DOC reserve boundary of any new lots created as a result of subdivision. Both these methods would probably result in fewer lots being possible after re-zoning, and would still result in a very small protected area.
45. Finally I note that many submissions suggest that the site should be added to the DOC reserve to become one larger reserve. These suggestions would presumably add to the amenity values of the site; however assessment of these is beyond my brief. Several of these submissions, however, suggest that the biodiversity of the enlarged site should be augmented by a restoration project. In my opinion, any restoration of the site or enlarged site, while having undoubted amenity values, would not result in significant biodiversity gains for the area, because of the small size and other constraints discussed above. I consider that the resources necessary for such restoration would be more effectively used in other restoration or biodiversity projects elsewhere in the Western Hutt Hills.

### **Conclusion**

46. Within almost any New Zealand suburb, all forest remnants have some ecological value. I consider that this site has some value as animal habitat. Therefore the loss of this site would have some adverse ecological effects, even if these are only cumulative effects from the progressive loss of smaller or lower value sites.
47. However, as I have discussed above, in this case, the habitat and other ecological values of the site are low, because of its small size, poor condition, likelihood of succession to vegetation that is not representation of forest in the area, and vulnerability to edge effects. This means that even total loss of vegetation resulting from re-zoning for residential development would represent a minor adverse ecological effect.



Dr Paul Blaschke

6 August 2010

## Appendix: Scientific names of species in text

Fivefinger	<i>Pseudopanax arboreus</i>
Flowering cherry*	<i>Prunus serrulata</i>
Ginger plant*	<i>Hedychium gardnerianum</i>
Gorse*	<i>Ulex europaeus</i>
Hangehange	<i>Geniostoma ligustrifolia</i>
Kanono	<i>Coprosma grandifolia</i>
Karamu	<i>Coprosma robusta</i>
Kohekohe	<i>Dysoxylum spectabile</i>
kohuhu	<i>Pittosporum tenuifolium</i>
Kowhai	<i>Sophora microphylla</i>
Mahoe	<i>Melycytus ramiflorus</i>
Mamaku	<i>Cyathea medullaris</i>
Mapou	<i>Myrsine australis</i>
Montbretia*	<i>Crocasmia x crocosmiiflora</i>
Ngaio	<i>Myoporum laetum</i>
Pine*	<i>Pinus sp.</i> (possibly <i>P. ponderosa</i> (western yellow pine))
Pohutukawa**	<i>Metrosideros excelsum</i>
Porokaiwhiri	<i>Hedycarya arborea</i>
Ragwort*	<i>Senecio jacobaea</i>
Rangiora	<i>Brachyglottis repanda</i>
Totara	<i>Podocarpus totara</i>
Veldt grass*	<i>Ehrharta erecta</i>
Wandering willie*	<i>Tradescatia fluminensis</i>

\* Introduced species to New Zealand

\*\* Native to New Zealand but not to Wellington region

**Appendix 3:**  
**Response to Submissions on Open Space and Visual Amenity**  
**PAOS Ltd, Mrs Cheryl Robilliard**





# **Plan Change 15 Poto Road, Normandale**

## **Response to Submissions on Open Space and Visual Amenity**

**PREPARED FOR:  
Hutt City Council**

**PREPARED BY:  
PAOS Ltd**

August 2010

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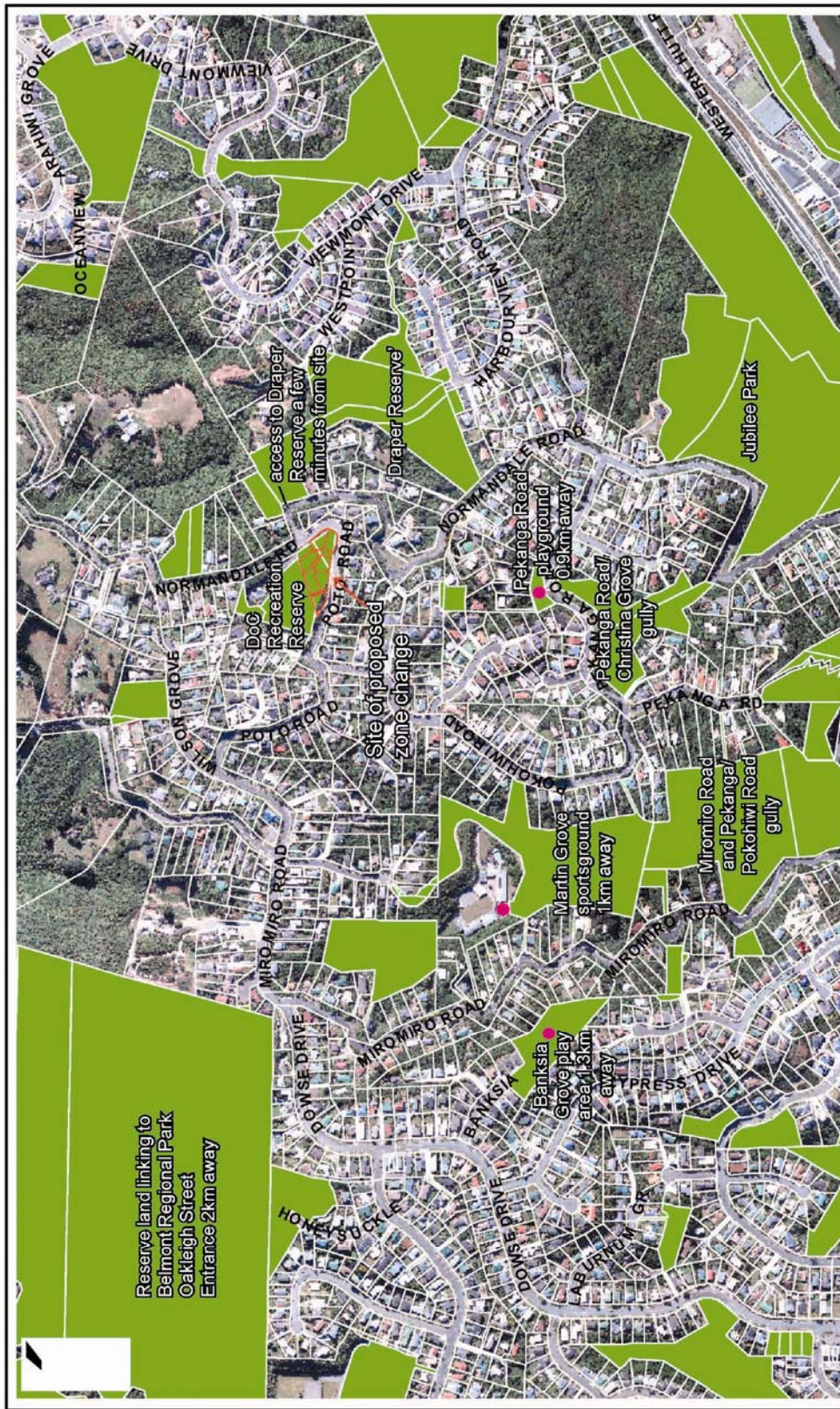


## INTRODUCTION

1. The purpose of this report is to assist the hearings committee by considering submissions on Plan Change 15 concerning open space and visual amenity.
2. Plan change 15 proposes zoning lands at the corner of Poto Road, Normandale to General Residential Activity Area. The lands concerned are two areas of Council-owned land on Poto Road, Normandale (refer Map 1 on the following page):
  - Site held by the Council in Fee Simple with a frontage immediately off Poto Road - Pt Sec 93 Normandale Settlement SO 33438 (CT 26B/735)
  - Adjacent site to the north of this also described as Pt Sec 93 Normandale Settlement. Formerly held as legal road, it is now held in Fee Simple - Sec 1 SO 33438.
3. The sites are a sloping regenerating bush covered area located on a sharp bend in Poto Road, opposite the intersection of Poto Road with Normandale Road. The surrounding area is zoned General Residential. To the north of the two sites and immediately adjacent to Pt Sec 93 is a small Crown-owned Recreation Reserve which the Council has been appointed to control and manage, and the Normandale Playcentre. Vehicle access to the playcentre runs along the eastern side of the sites.
4. The sites form part of a ridge running from near the end of Wilson Grove to the beginning of Panorama Grove. This ridge has been developed for residential purposes, which is the general pattern for development in the Western Hills, including Normandale i.e. developed ridges separated by undeveloped, bush clad gullies. The sites and the neighbouring reserve are the only part of the ridge that have not been developed for residential use. The related gully to the east is undeveloped - this is the area between Panorama Grove and Normandale Road known as Draper Reserve. Formerly the sites would have been viewed as part of the ridges defining this gully, but the two sites, along with the neighbouring recreation reserve, are now separated from this larger bush clad gully by roads and residential properties.
5. The sites are located within the 'Western Hills Landscape Identity Area' as identified in the Hutt City Council's Reserves Strategic Directions, where "steep bush clad gullies, prominent hilltops and escarpments"<sup>1</sup> are a key feature.

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<sup>1</sup>Hutt City Council Reserves Strategic Directions, October 2003, page 17.



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Although this information has been prepared with care and in good faith, the Council does not accept any liability for any loss, injury or damages of any kind, whether direct or indirect, arising from the use of this information. This map is based on the New Zealand Topographic Map projection. Cadastre information sourced from Land Information New Zealand data. Open Copyright Reserved.

**Legend**

- Playgrounds
- Parcel boundaries
- Reserves

**Map 1 Overview Map**  
 Area of proposed Zone change in relation to lands managed as reserve by Hutt City Council

200 100 0 200 400  
 Meters

Compiled : Matthew O'Riley  
 Investigated : Emma Corbett  
 Job Ref : 4112  
 Date : 07/12/2009

**HUTT CITY**  
 Land Information Services

## BACKGROUND

6. I first visited the sites as part of a review of all Council lands managed as reserves. The aim of the review was to consolidate the existing reserve network to “ensure all lands contribute effectively to the Council’s core parks and reserves services and activities now, and in the future”<sup>2</sup>.
7. The principle that guided the review was to assess the “contribution each land parcel makes towards protecting and preserving the city’s important natural, cultural and landscape features and/or the community’s use and enjoyment” in order to ensure that “only lands of value are retained in the reserve network”<sup>3</sup>.
8. In order to review the contribution each area makes to the reserve network, review criteria were approved by Council in 2003<sup>4</sup>. Since that time, all lands managed as reserve in Hutt City have been reviewed. During that process, the majority of lands were identified as contributing to the reserve network. The review also identified a number of areas that were an important part of the reserve network but that had no protection as public lands. Many of these areas were in the regenerating gullies of the Western Hills, which the Reserves Strategic Directions emphasises “should be managed and extended to ultimately form ecological corridors and a network of tracks leading from the Hutt River corridor through the Western Hill’s suburbs and on to the Belmont Regional Park hilltops”<sup>5</sup>. These lands have now been protected as reserve.
9. A small number of lands were identified as contributing less to the reserves network. Reasons were principally that they did not provide high quality park facilities and services (focussing on where there is greatest overall benefit for the city and its environment - Key Direction 3 of the Reserves Strategic Directions), did not protect and strengthen important landscape, cultural, ecological and historic features (Key Direction 4), did not improve linear recreational opportunities (Key Direction 5), or did not develop stronger ties with the community to ensure effective and efficient targeting of resources and greater ownership of reserves (Key Direction 6).
10. The two lands at Poto Road were identified during the review as having an overall low to medium level of reserve significance over five criteria with attribute weightings

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<sup>2</sup> Key Direction 1, *Hutt City Council Reserves Strategic Directions*, October 2003, page 9

<sup>3</sup> *Ibid*, page 9

<sup>4</sup> *Reserve Land Acquisition/Disposal, Policy and Guidelines*, August 2003.

<sup>5</sup> *Hutt City Council Reserves Strategic Directions* October 2003, page 17

(Landscape Visual, Open Space, Natural Site Features, Ecological and Informal Recreation), and not meeting any of the Key Directions. At the time of the review these lands were in Fee Simple and Legal Road.

## GENERAL COMMENTS

11. The sites were assessed against the attributes of the criteria. As established in the Reserve Land Acquisition/Disposal Policy and Guidelines, attributes were assigned in the context of the wider reserves network, in this case the reserve network of Normandale and the wider Western Hills.
12. As well as using the attributes to assess, the following were also taken into account<sup>6</sup>:
  - Long-term potential of the site and merit in addition to those assessed using the attributes
  - The number of attributes the land has and whether it has multi-values or opportunities for multi-use
  - Whether the land increases the value of neighbouring reserve land.
13. The lands were assessed as having potential as a neighbourhood reserve, but that the existing Recreation Reserve could fulfill this role; that even when combined with the neighbouring Recreation Reserve the lands could not be described as having multi-values, nor do they offer opportunity for multi use; and that while combining the land with the neighbouring Recreation Reserve would increase the overall size of the reserve, the steep sides onto Poto Road, exposed edges, small interior, isolation from the wider ecological and track network and corresponding lack of opportunities to develop ecological and recreational linkages, reduces the lands' value as reserve, even when combined with the neighbouring recreational reserve.

## SUMMARY OF CONSIDERATION OF SUBMISSIONS

14. Three submitters support the proposed plan change. Reasons for support include that the land was intended for roading use, not as a park, new housing is required to populate the suburb/city which would lead to opening up the link to Harbour View, open space in the area is provided by Belmont Regional Park; and finally that the land proposed to be rezoned is outside the Treaty settlement process but within the rohe of the Wellington Tenth Trust, who support the plan change.

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<sup>6</sup> Reserve Land Acquisition/Disposal, Policy and Guidelines, page 14



15. Two submitters partially support the plan change. One supports the plan change so long as the driveway is not shared with the playcentre, the other submits two alternative options to the development proposed.
16. Submissions which oppose the plan change do so for a number of reasons. A summary of my response to submissions is outlined below, grouped under reasons submitters give for opposing the plan change.

**Zone as General Recreation Activity Area, develop and classify as reserve**

17. Overall, the impact on the provision of informal recreation by zoning the sites General Residential is likely to be low. This assessment is based on current provision of open space for informal and formal recreation in the Normandale area. Five reserves and one regional park are within two kilometres of the site. Three playgrounds with play equipment are .9 to 1.3 kilometres from the site, within walking distance and for those who prefer to drive, with opportunities for parking (see Map 1 on page 6). Furthermore, the existing neighbouring Recreation Reserve allows for future development for informal recreation such as a short loop walk, picnicking area, viewpoints and natural adventure play. Once access is developed and the reserve appropriately developed, it would provide local amenity.
18. Zoning the corner sites General Recreation and clearance of vegetation would potentially allow for the development of a play area. Safety fencing at the top of the road escarpment along Poto Road would be necessary because of the steep drop to the road. Resources spent on developing these sites for informal recreation would need to be balanced against existing informal recreation provision in the area and the potential to develop the existing Recreation Reserve.
19. It is my understanding that it is unlikely that the loss of vegetation on the sites would have an impact on the biodiversity of the Normandale area or detract from any existing ecological corridors leading to Belmont Regional Park. This is primarily because the sites are separated from the original gully and ridgeline pattern.
20. If left alone, the native vegetation on the sites would continue to mature. But the area is small even when considered alongside the neighbouring Recreation Reserve, with a large exposed edge and small interior and would not, as I understand it, be of a size that sustains ecological integrity.
21. The points that submitters raise about the value of trees and the impact of the loss of vegetation in this area are valid. Retaining some of the existing vegetation on the sites

and making trees a feature of residential properties may be possible. Existing vegetation on the sites could be more easily retained or trees more easily planted once building work has been completed by creating larger lot sizes than the minimum allowed in the District Plan in General Residential Activities Areas.

#### **Sites are part of a prominent ridgeline**

22. The sites form part of a ridgeline running from near the end of Wilson Grove to the beginning of Panorama Grove. This ridgeline has been developed for residential purposes as the suburb of Normandale has grown and an open green ridgeline no longer remains. Rather, residential properties appear to be nestled into the surrounding vegetation.
23. Extending the residential zone further up the ridgeline would fit with the existing pattern of development in the 'Western Hills Identity Area', where residential properties are generally situated on ridgelines, with regenerating gullies and escarpments maintained as reserve land.
24. The site can be viewed from a number of locations within the suburb, from parts of the neighbouring suburb of Harbourview and from parts of the valley floor. The green hilltop of the Recreation Reserve would preserve the highest and therefore most prominent point of the ridge as green open space. The creation of larger lot sizes to allow retention of vegetation on the sites would help to mitigate the view of the residential properties and retain the pattern of development in the Western Hills where houses appear to be nestled into the vegetation.
25. Currently the sites are not used for informal recreation due to the thick vegetation and lack of access. Other reserves in the surrounding area provide opportunities for informal recreation and walking connections and these connections will not be altered as part of the proposed plan change. The Indicative Development Plan shows a shortcut through the sites and opens up access to the neighbouring Recreation Reserve.
26. Developing recreational tracks on the site would not contribute greatly to the wider track network of the Western Hills as any tracks would not link to existing tracks in the network, as is the aim of the Reserves Strategic Directions. Developing tracks in conjunction with the neighbouring Recreation Reserve would provide a greater area for track development, but this would also be limited as the Recreation Reserve does not connect to any further land areas in the reserve network.

27. Zoning the land General Residential would not prevent pedestrian through access (which I understand existed before Poto Road was widened) from being developed and the Indicative Development Plan suggests how this could occur.

#### **Loss of views out from the Recreation Reserve**

28. With development of the existing Recreation Reserve, the area could be opened up and easier access provided to viewing areas. Residential development on the sites would be in the foreground, but views from the Recreation Reserve could be directed to view south towards the harbour and vegetation could be retained or planted as a visual buffer between houses and the reserve.

#### **Issues of visual or 'residential' amenity**

29. While zoning of the sites as General Residential would alter the visual amenity of the area, the type of development allowable under a General Residential zoning seems appropriate in the context of the existing residential character and urban form of Normandale and the Western Hills. Further steps to mitigate the effects of residential development would be appropriate, such as the development of lot sizes larger than the minimum allowable under the District Plan to enable retention or planting of vegetation between houses, continuing the appearance of houses nestled in the surrounding vegetation.

#### **The sites' ecological importance**

30. Zoning of the sites as General Residential will result in the loss of regenerating vegetation. However, this would be unlikely to detract from the existing ecological corridor to Belmont Regional Park in the immediate neighbourhood along Draper Reserve, or any other existing significant ecological corridors within the Normandale area.
31. If left alone, native vegetation on the sites would most likely continue to develop. However, the area is small even when considered alongside the neighbouring Recreation Reserve, and would not be of a size that sustains ecological integrity. It has a large edge area and small interior. The loss of this small area of vegetation is unlikely to have an impact on the biodiversity of Normandale or detract from any existing ecological corridors, due to its separation from the original gully and ridgeline pattern by roads and residential housing.

### **Compromising the existing DoC Recreation Reserve**

32. The site and the existing DoC Recreation area are already separated from the surrounding natural areas by Poto Road and residential properties to the east. The potential for increasing the ecological sustainability of the sites as part of the wider area is low as the sites, even when assessed in conjunction with the neighbouring Recreation Reserve, are separated from the wider contiguous gully area of Draper Reserve by roads and residential properties to the north and east of the sites. The feeling of freedom and 'away from it all ambience' would still exist in other nearby, currently more accessible sites such as Draper Reserve. Developing access to the existing Recreation Reserve would also provide this experience.

### **Issues with access to the Playcentre**

33. The Council is currently in the process of granting a right of way to the Playcentre over the current formed access and registration of the easement. Access to the Playcentre will therefore be protected.

### **Heritage Criteria**

34. The sites do not meet criteria in Hutt City Council's Reserve Land Acquisition/Disposal Policy and Guidelines for medium to high levels of heritage significance. To meet medium or high significance, the sites would need to be registered Category I or II under the Historic Places Act and be essential or complimentary to wider reserve objectives

## **CONSIDERATION OF SUBMISSIONS**

### **Support for Plan Change 15**

The following paragraphs summarise submissions which support or partially support Plan Change 15.

#### **Reasons for supporting the plan change:**

35. The land was intended for roading use, not as a park. If a road had been put through this area as intended, the adjacent land would have become residential sections (Submitter 6).
36. New housing is required to populate the suburb/city which would lead to opening up the link to Harbour View and therefore access to the hospital and City (Submitter 1).

37. The Plan change will not result in a loss of open space as the suburb has Belmont Regional Park right on the doorstep (Submitter 1).
38. The land proposed to be rezoned is outside the Treaty settlement process but within the rohe of the Wellington Tenth Trust, who support the plan change (Submitter 8).

**Partial support of the plan change:**

39. Supports so long as driveway is not shared with the playcentre (Submitter 1)
40. Submitter 9 supports the idea of development on the site to “ensure the school’s long term viability” by attracting “younger couples to the suburb ... small to medium housing development would assist this”.
41. Submitter 9 submits two alternative options to the development proposed.

**Discussion:**

42. The Indicative Development Plan was drawn up as an example of how the land might be developed under General Residential zoning. The indicative plan shows vehicle access from the southern side of the site on Poto Road. A pedestrian access point is suggested between lots 4 and 6 and the playcentre driveway on the northern side of the site to allow pedestrians access through the site. The playcentre vehicle access remains separate from the proposed subdivision access.
43. The options proposed by the submitter both protect the corner site as reserve, extending the development into the neighbouring Department of Conservation Reserve. As I understand it, the option of a land swap with the neighbouring DoC Reserve was considered by Council, but not supported by the Department of Conservation.

**Submissions which oppose Plan Change 15**

44. Submissions which oppose Plan change 15 have been broken down into the reasons for opposing the plan change. Individual submitter’s comments may cover more than one reason for opposing the change so submitters may be referred to several times.

**Zone as General Recreation Activity Area, develop and classify as reserve**

45. Submitter 2 encourages the council to “provide the maximum opportunity for recreation by creating a reserve...which is generous in size and not spoilt by too much housing”.

46. Submitter 7 states that the community wants a reserve, citing a November 2007 survey conducted by the Normandale Residents Association where 92% of respondents opted for retention of the land as reserve as opposed to development for housing. The submitter refers to the 2006 Census which shows that Normandale is a family orientated suburb and quotes the PAOS assessment that “growth in the number of families living in Normandale...could provide further demand for playground or kick-a-ball spaces”<sup>7</sup>. The submitter refers to an historic plan to create a playground on the sites in 1985, and how this option was again raised during the Council’s Land Review process in 2008, but was not pursued due to the “current population densities and the locations of other playgrounds in the Western Hills”<sup>8</sup>.
47. The submitter goes on to state that the Council believes the community is well-resourced in terms of recreational facilities and opportunities. The submitter does not believe this is the case, and states that the 2009 PAOS summary of other recreational opportunities in and around the Normandale area is limited due to the fact that the existing sites are either “unsuitable or inaccessible to parents with young children and those who are physically infirm in the community”.
48. The submitter states that parts of Draper Reserve, Jubilee Park, and Belmont Regional Park are not wheelchair and stroller friendly, that the playground at Pekanga Road is not suitable as it does not provide carparking (further submitter 14 also states this), the playground at Banksia Grove is unsafe due to this site being “perched on a steep, unfenced, cliff”, and the playing field at Martin Grove has no playground. The submitter concludes therefore that the Poto Road sites are “the only area that has the potential to meet the community’s growing recreational needs”.
49. The submitter states that combining the sites with the neighbouring recreation reserve would create a ‘usable reserve’ and that by doing this there is the “possibility of making available a range of informal recreational opportunities for the community, namely cycling and walking”.
50. The submitter further states that the Western Hills is the only Landscape Identity Area identified in the Council’s Reserves Strategic Directions “without any active recreation for its residents and has the least amount of conservation reserve area.”

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<sup>7</sup> PAOS report p.12.

<sup>8</sup> Hutt City Council, 2008. Western Ward Land Review: Report on Submissions 20.6.2008.

51. Submitter 4 and further submitters 12 and 14 support submitter 7's interest in developing the sites in conjunction with the neighbouring recreation reserve as a recreational area. Submitter 4 and further submitter 14 also quote a survey by the Normandale Playcentre which shows that all 34 members of the playcentre would prefer the sites to be retained as reserve.

**Discussion:**

**Potential for development of the two sites for recreational purposes**

52. The Recreation Reserve immediately to the north of the sites is not currently developed as a reserve for recreation. While there is currently no easy access to the reserve, there is opportunity to develop a short access track through the reserve for local resident walking, viewing and picnicking, and a small 'adventure playground' among the trees, as shown in the Indicative Development Plan.
53. Zoning the corner sites General Recreation, and clearance of vegetation on the sites would create a 'more usable reserve' as stated by submitter 7, and would potentially allow for the development of a play area. General Recreation Activity Area zoning states that "formal and active recreation activities should be encouraged in those areas where visual and amenity values will not be affected ... and topography is suitable"<sup>9</sup>. It would be possible to develop the lower site directly next to Poto Road for a play area with safety fencing above the steep drop to the road below on the sites' southern side. This would mean removing vegetation.

**Existing recreational opportunities**

54. The impact on the provision of informal recreation by zoning the sites General Residential is likely to be low. This assessment is based on current provision of open space for informal and formal recreation in the Normandale area. There are six existing reserve areas within 2km of the site:
  - Draper Reserve (a few minutes walk from the site) provides recreational access in the form of a walking track through a bush reserve between Harbourview Road/Panorama Grove and Normadale Road
  - Jubilee Park on Normandale Road is located within a short distance of the sites and provides recreational access between Normandale and Harbourview and open grassed areas among historic garden sites suitable for informal recreation

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<sup>9</sup> Hutt City Council. District Plan – City of Lower Hutt, page 7A 1-2.

- Belmont Regional Park is close to the sites. The Oakleigh Street entrance is 2km away
  - The playground at Pekanga Road (0.9km away from the sites) does not have separate parking facilities as this playground is considered to be a 'neighbourhood playground' accessible within walking distance. Parking is available on the street
  - The playing field at Martin Grove (1km from the sites), is an open grassed area with plenty of open space for kick-a-ball activities. Normandale School has a playground with play equipment on the site adjacent to the playing fields which is accessible to the public, with parking available on Martin Grove
  - The playground at Banksia Grove is located 1.3km away at Maungaraki. A relatively large, flat area at the entrance to the reserve at the end of Banksia Grove is suitable for kick-a-ball activities as this end of the reserve is fenced and a safe distance from the road. Although unfenced at the eastern end which slopes steeply down to the back of properties on Miro Miro Road, the slope is thickly vegetated, providing some protection. Parking is available on Banksia Grove.
55. Submitter 7 states that "parts of these areas are not wheelchair and stroller friendly". While this unlikely to change in Draper Reserve due to its steepness, Jubilee Park and Belmont Regional Park do provide accessible areas, including picnic areas at Jubilee Park and picnicking facilities and an easily accessible 'Stream Walk' suitable for mountain buggies<sup>10</sup> at the Stratton Street entrance to Belmont Regional Park (approximately 3 kilometres away).
56. The neighbouring Recreation Reserve could be developed for informal recreational activities such as small loop track, picnicking, viewing/lookout and small adventure playground within the trees.
57. The submitters comment that the Western Hills is the only Landscape Identity Area identified in the Council's Reserves Strategic Directions "without any active recreation for its residents and has the least amount of conservation reserve area".
58. The Western Hills was identified by submitter 7 as having a lack of active recreation facilities. Active recreation in this sense is defined as sportgrounds or other outdoor

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<sup>10</sup> <http://www.gw.govt.nz/Walking-and-tramping-tracks/>



- sports facilities. The reason for this deficit is largely due to the steep topography of the Western Hills which makes it unsuitable for sportsfields due to lack of flat open areas and drainage issues with areas that are available. The Reserves Strategic Directions states that “the Hutt Valley, Harbour, and Wainuiomata areas contain all of the active recreation reserves because they are on flat land and most suited to sportsfield development.”<sup>11</sup>
59. The Poto road sites would be unsuitable for development for active recreation due to their small size, lack of flat land and proximity to the road. They would be suitable for some forms of passive recreation, although the Reserve Strategic Directions identifies that the Western Hills has the second highest area available in terms of reserves for passive recreation.<sup>12</sup>
60. The Council’s Reserve Strategic Directions took into account Council owned land classified or managed as reserve when analysing the types of reserves present in each Identity Area.<sup>13</sup> It did not include lands that are privately owned under covenant or owned by another body. In this case, although the Western Hills has the smallest proportion of what are defined as ‘conservation reserves’, the extensive conservation area of Belmont Regional Park was excluded from the Strategic Directions as much of this land is owned by Greater Wellington Regional Council. When you take these lands into consideration, the Western Hills has large areas of ‘conservation reserves’.
61. Furthermore, should the Council seek to obtain more land to contribute to the conservation reserves in the Western Hills, priority would go to those lands which contribute to achieving the outcomes of the Reserves Key Directions. In the case of the Western Hills, this would be lands which are “protecting regenerating bush gullies and developing ecological corridors to link with the bush areas of Belmont Regional Park”<sup>14</sup> or which have the potential to “link existing bush gullies and provide walking access from the Hutt River to Belmont Regional Park” or which provide “pedestrian and cycle recreation opportunities”<sup>15</sup>. The two sites would not contribute to any of these due to their small size and isolation from the existing gully and ridgeline pattern.

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11 Hutt City Council.:*Reserves Strategic Directions*.,October 2003. page 21

12 Ibid page 20.

13 Ibid page 20.

14 Ibid page 11.

15 Ibid page12.

## **Opposition to Plan Change 15 due to the loss of green open space /removal of vegetation on the site**

62. Submitter 3 opposes "the intention to destroy a green area of Normandale's heritage".
63. Submitter 7 states that zoning the land General Residential Activity Area would "result in the loss of open space for the community". The submitter states that trees create "visual diversity" and coherence to the urban landscape, give a sense of civic pride and directly contribute to the economic life of the city". The submitter further states that trees provide a "sense of well-being" which the submitter considers "the most important aspect of the Western Hills".
64. Submitter 10 opposes the plan change and asks that the Council retain this area as "green open space in perpetuity", further stating that the removal of vegetation "lessens the Hutt Valley's contribution to the world's carbon sink".

### **Discussion:**

65. I agree that trees provide value in the urban landscape. Retaining some of the existing vegetation on the sites would go some way to mitigating the effect of new residential development and continue to make trees a feature of residential properties in the Western Hills. Existing vegetation on the sites could be retained by creating larger lot sizes. The proposed plan change to General Residential Activity area allows for a minimum lot size of 400m<sup>2</sup> with maximum site coverage of 35%. All lots in the Indicative Development Plan exceed this lot size, with the smallest lot being 450m<sup>2</sup> and the largest 518m<sup>2</sup>. This is similar to existing lots in the surrounding area, including 151 Normandale Road (450m<sup>2</sup>), 149 Normandale Road (501m<sup>2</sup>), 21 Poto Road (481m<sup>2</sup>), several properties in Eastview Grove (508m<sup>2</sup> - 521m<sup>2</sup>) and properties at St Elizabeth Heights off Poto Road. Number 1 Poto Road opposite the sites is 538m<sup>2</sup>.
66. However, other residential lots in the immediate area are generally larger than this and therefore allow for more vegetation on the site, with lot sizes being around 800m<sup>2</sup>. I therefore suggest that a subdivision which proposed larger lots would be more in keeping with the surrounding area and allow for the retention of vegetation on the lots, or alternatively the ability to plant vegetation once building work has been completed. This retention of vegetation would also mitigate some of the visual effects of subdivision.
67. Open space and vegetation corridors in this area are provided for, so it is unlikely that the loss of this small area of vegetation would have an impact on the biodiversity of

the Normandale area or detract from any existing ecological corridors leading to Belmont Regional Park, due to their separation from the original gully and ridgeline pattern.

68. If left alone, the native vegetation on the sites would continue to mature and eventually cover the site. But the area is small with a large edge area and small interior even when considered alongside the neighbouring Recreation Reserve, and would be unlikely to sustain ecological integrity.

#### **Opposition to Plan Change 15 as the sites are part of a prominent ridgeline**

69. Submitter 7 states that the land is “prominent and forms part of a ridge ... and constitutes significant scenic amenity” and development of the sites for residential use would “degrade the local environment” and “result in the permanent loss of Normandale’s characteristic ‘green skyline’”.
70. Further submitter 12 states that the site is a “prominent bush covered hilltop visible from many directions”, and that the ridgeline is “essentially unmodified”. The submitter states that this is the only hilltop land in urban Normandale which is in public ownership and therefore has a “significant contribution” to the “essential character” of the area. The submitter states the prominence of the area is demonstrated by the existence of a geodetic survey mark on the site.

#### **Discussion:**

71. The sites form part of a ridgeline running from near the end of Wilson Grove to the beginning of Panorama Grove. This ridgeline has been developed for residential purposes as the suburb of Normandale has grown and an open green ridgeline no longer remains. Rather, residential properties appear to be nestled into the surrounding bush. This is the view from parts of the valley floor such as from Woburn Road, where the site is viewed with the regenerating green escarpment of Jubilee Park in the foreground. The sites are separated from this green area by housing along the ridgeline, periodically broken by vegetation on private properties.
72. Extending the residential zone further up the ridgeline would fit with the existing pattern of development in the ‘Western Hills Identity Area’, where residential properties are generally situated on ridgelines, with regenerating gullies and escarpments maintained as reserve land.
73. I agreed with submitters that the ridge can be viewed from parts of the valley floor. The creation of larger lot sizes to allow retention of vegetation on the sites would help

to mitigate the view of the residential properties, particularly when viewed from a distance, and retain the pattern of development in the Western Hills where houses appear to be nestled into the vegetation. I note that the Recreation Reserve would remain as a green hilltop, preserving the highest and therefore most prominent point of the ridge as green open space.

#### **Submissions that oppose Plan Change 15 due to issues of recreational amenity**

74. Further submitter 12 states that even though the area is undeveloped it “makes life pleasant for the people of Normandale and visitors”. The submitter goes on to states that the adjacent Poto Road area is popular with walkers.
75. Submitter 7 states that zoning the sites General Recreation Activity Area would meet the community’s express need for better recreational facilities and opportunities in the area and would help to meet the Councils Reserves Strategic Directions, in particular to “link bush gullies to provide walking access from the Hutt River to Belmont Regional Park”, to “provide recreation and cycle opportunities” and to “cater for aging and less mobile members of the community”.

#### **Discussion:**

76. Currently the sites, along with the neighbouring recreation reserve, are not used for informal recreation, possibly due to their lack of access and thick vegetation. The adjacent Draper Reserve, along with other areas discussed in paragraph 58, provide opportunities for informal recreation and walking connections and these connections will not be altered as part of the proposed plan change. Access could be developed on the neighbouring Recreation Reserve for informal recreation.
77. The Indicative Development Plan shows how recreational access could be improved by creating a shortcut through the sites and opening up access to the neighbouring Recreation Reserve.
78. Developing recreational tracks on the site would not contribute greatly to the wider track network of the Western Hills as any tracks would not link to existing tracks in the network, as is the aim of the Reserves Strategic Directions. Developing tracks in conjunction with the neighbouring Recreation Reserve would provide a greater area for track development, but this would also be limited as the Recreation Reserve also does not connect to any further land areas in the reserve network.

79. Further, zoning the land General Residential would not prevent pedestrian through access (which formerly existed over the site) from being developed and the Indicative Development plan suggests how this could occur.
80. As already discussed, a short loop track in the existing recreation reserve could provide a pleasant environment for local residents with viewpoints, picnic area and opportunity for children to explore a natural environment close to home. Developing access to this reserve would increase local amenity.

### **Opposition to Plan Change 15 due to loss of views out from the Recreation Reserve**

81. Further submitter 12 asserts that the resulting development from the proposed plan change would obscure the view currently available from the existing high point on the sites. Submitter 7 provides photographs of this view in the Appendix to their submission. It is not clear from either submission from where the photographs have been taken, but it is stated that the area lies just within the existing Recreation Reserve.

#### **Discussion:**

82. On the site visits, no photographs were taken looking out from the sites towards the city, as views at ground level were obscured by the vegetation on the site.
83. There is potential to mitigate views of the residential development from the existing Recreation Reserve, by designing the picnic area to view south towards the harbour. This could be achieved by retaining vegetation on the Recreation Reserve side of the boundary with Lots 1, 2 and 4, blocking views towards the development and directing views southwards to the harbour.

### **Opposition to Plan Change 15 due to issues of visual or 'residential' amenity**

84. Submitter 5 states that residential amenity matters are ignored and that there would be a loss of "existing amenity values, and associated safe roading environment".
85. Further submitters 12 and 13 support submitter 5 on this matter.
86. Submitter 7 states that "building houses on the Poto Road corner will undoubtedly alter the visual amenity value of the Normandale suburb and alter its character." The submitter goes on to state that the subdivision proposed in the Indicative Development Plan is "inconsistent with the low density residential character of the suburb."

**Discussion:**

87. A General Residential Activity Area allows for a minimum lot size of 400m<sup>2</sup> with maximum site coverage of 35%. The District Plan states that 'within the General Residential Activity Area, medium density residential development is encouraged to preserve the overall open character'.<sup>16</sup> In this part of Normandale, older properties tend to be situated on larger lots, allowing the development of vegetated areas between houses. More recent development is largely on smaller lot sizes e.g. Eastview Grove and St Elizabeth Heights. Potentially, maximum coverage of 35% would allow for trees, continuing the appearance of houses nestled into the surrounding vegetation. Retaining the adjacent area of Recreation Reserve as open space would further add to this appearance. Lot sizes larger than the minimum allowed under the District Plan would increase scope for vegetation between properties.

**Opposition to Plan Change 15 due to the sites ecological importance**

88. Submitter 5 states that assessment of ecological values is not substantiated and "devalues the ecological status of mahoe and black mamaku tree ferns".
89. Further submitter 12 states that the area supports a range of native wildlife and is contiguous with, and naturally complements the adjacent recreation reserve, forming with it a viable habitat for expanding biodiversity.
90. Submitter 10 also believes the site has ecological importance, as does Submitter 7. Submitter 7 states that the Poto Road corner is "contiguous with and naturally complements" the adjacent Recreation Reserve and is part of the ecological corridor through Draper Reserve leading up to Belmont Regional Park and needs to be protected as is identified in the Council's Reserves Strategic Directions. The submitter states that the loss of this area would "impact on the biodiversity that currently exists".
91. Further submitter 12 and Submitter 10 state that the area provides a link or green corridor for bird movement to Belmont Regional Park.

**Discussion:**

92. An initial assessment of the sites' ecological values was determined by criteria from the Hutt City Council's Reserve Land Acquisition/Disposal Policy and Guidelines, approved by Council in August 2003.

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<sup>16</sup> *Hutt City Council. District Plan – City of Lower Hutt page 4A 5.*

93. The criteria defines a site as having high ecological value and 'significant vegetation' when it is listed as a Significant Natural Resource Area in the District Plan, or when there are trees identified as significant in the District Plan on the site.
94. The criteria defines an area as having potential to increase ecological sustainability if the land is of sufficient size to retain/improve ecological integrity on its own (over 2 hectares), or is physically connected to a wider area which would provide this. As stated above this is not the case, and the sites and the adjacent Recreation Reserve area are further separated from the adjacent gully area of Draper Reserve by roads and residential properties to the north and east of the sites.
95. If left alone, the native vegetation on the sites would continue to develop. However, the area is small and has a large edge area and small interior, and even when considered alongside the neighbouring Recreation Reserve, would not be of a size that sustains ecological values.
96. In addition, reserve provision protects large areas of vegetation in Normandale, and it is unlikely that the loss of this small area of vegetation would have an impact on the biodiversity of the Normandale area or detract from any existing ecological corridors leading to Belmont Regional Park due to their separation from the original gully and ridgeline pattern.
97. The existing ecological corridor runs up the gully which starts at Jubilee Park, through private land to Draper Reserve, then through more private land to Belmont Regional Park. The Poto Road sites are separated from this corridor by roads and residential housing, and development of the sites as residential is unlikely to detract from this existing ecological corridor.

**Opposition to Plan Change 15 because it would compromise the existing DoC  
Recreation Reserve**

98. Further submitter 12 states that the proposed Plan Change 15 development would compromise the existing DoC owned recreation reserve by surrounding the reserve with housing, isolating it from other natural areas, and destroying the feeling of freedom and 'away from it all' ambience.

**Discussion:**

99. The site and the existing DoC Recreation area are already separated from the surrounding natural areas by Poto Road and residential properties to the east. The potential for increasing the ecological sustainability of the sites as part of the wider area is low, as the sites, even when assessed in conjunction with the neighbouring Recreation Reserve, are separated from the wider contiguous gully area of Draper Reserve by roads and residential properties to the north and east of the sites.
100. The feeling of freedom and 'away from it all ambience' would still exist in other nearby, accessible sites, such as Draper Reserve. Developing access to the existing recreation reserve would also provide this experience.

**Oppose due to issues with access to the playcentre**

101. Submitter 5 states that the proposed plan change will alter the access to the playcentre by zoning the area at the bottom of the entrance driveway as General Residential Activity Area, and that issues of right of way or easement need to be addressed.
102. Further submitter 14, Normandale Playcentre, wishes to retain and maintain exclusive use of their driveway, and is therefore opposed to any suggestions of shared access and housing along the playcentre driveway as proposed by Submitter 9.

**Discussion:**

The Council is currently in the process of granting a right of way to the Playcentre over the current formed access and registration of the easement. Access to the Playcentre will therefore be protected. The Indicative Development Plan does not show any of the proposed lots impeding this access. Not does it suggest any shared vehicle access with the playcentre driveway.

**Heritage**

103. Submitter 7 states that the "Poto Road corner meets the heritage criteria as outlined in Hutt City Council's Reserve Land Acquisition/Disposal Policy and Guidelines".

**Discussion**

104. When assessed against the criteria, the sites have a low level of heritage significance. The heritage criteria in the Council's Reserve Land Acquisition/Disposal Policy and Guidelines states that an area has medium or high level of significance if it is registered Category I or II under the Historic Places Act and where "acquisition of the land for



reserve purposes is considered essential” or “are complementary to wider reserve objectives. This is not the case with the sites. Heritage value is considered to be low where a feature is present and may be of immediate local value but of little significance to the wider area, and therefore has lower priority.

## **Other matters**

### **Images provided under-represent the extent of the site.**

105. Further submitter 12 states that figures provided in the PAOS report - Figures 1,4,5,6,8 (1st), 8, (2nd) and 9 “consistently under represent the extent of the site and hence its impact on the environment”.

### **Discussion:**

106. The figures are a single photo or in some cases series of photos, taken from selected viewpoints as described in the captions below the figures. Pictures were taken with a digital SLR camera with a 50mm equivalent lens. This lens was used as this is considered the standard procedure for taking photographic representations of the landscape for use before the Environment Court of New Zealand. Figure 8 (2<sup>nd</sup>) was taken at 100mm as this formed a better representation of what the eye sees when looking at the site from this point. This image shows a more ‘zoomed in’ and therefore larger representation of the sites than would be shown with a 50mm lens.