

WELLINGTON CITY DISTRICT PLAN – DPC77

Submission form on publicly notified Proposed District Plan Change 77

Curtis Street Business Area

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE

Posted to	District Plan Team Wellington City Council PO Box 2199 Wellington 6011
Delivered to	Ground floor reception Civic Square/101 Wakefield Street Wellington
Faxed to	801 3165 (if you fax your submission, please post or deliver a copy to one of the above addresses) Please use additional sheets if necessary.
Emailed to	district.plan@wcc.govt.nz
We need to receive your submission by 5pm, Monday 11 March 2013.	

YOUR NAME AND CONTACT DETAILS

Full name Sarah Holden		
Full address 18 Creswick Terrace, Northland, Wellington 6012		
Address for service of person making submission As above		
Email sarahholden@xtra.co.nz	Phone 04 4755574	Fax

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

I could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED DISTRICT PLAN CHANGE 77 THAT MY SUBMISSION RELATES TO ARE AS FOLLOWS *(Please continue on separate sheet(s) if necessary.)*

1. Presumption of commercial development for the whole site
2. Noise and lighting
3. Traffic and congestion
4. Environmental impacts including wider catchment impacts on water run-off, soil contamination, impacts on flora and fauna
5. Economic impacts
6. Status of the concept plan

MY SUBMISSION IS THAT

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

Presumption of commercial development for the whole site

1. The Section 32 report contains a number of errors:
 - When the site was sold by the council in 1998 it was advertised as a residential / open-use site, and the council advertisement made it clear that potential purchasers should submit tenders that were in keeping with that zoning. Several proposals were received for less intensive development such as a gymnasium and small motor home park.
 - The Council has acted with a large degree of bias towards the zoning of the site and has appeared to discount options for promoting recreational facilities for the site, despite the fact that when the council first sold the site it received at least two offers of purchase for recreational purposes, which would be in keeping with the neighbouring sports parks.
 - The Curtis Street Business Area is justified on the basis of meeting a need for increased commercial activity in the western suburbs (35.1). The Section 32 report does not provide clear evidence of a need to provide for increased commercial activity and does not properly address the impact on other suburban centres. While greater commercial activity within Karori might be an aspiration of the current property owner, there is no evidence provided that the present pattern of commercial activity is constrained by availability of commercial premises.
- a. The Section 32 Report promotes rationalisation of zoning entirely on the basis of economic use of the site, without consideration of residential amenity, landscape character or ecological values. It provides no evidence to support the argument that increased economic activity on the site would increase community social well-being.

2. Noise and lighting

- It will not be possible to baffle the noise from the site, and noise pollution will be inevitable. Therefore all noise levels, including fixed plant noise, should not exceed that set for residential areas.
- Lighting levels for the site should not exceed that of outer residential areas. More requirements for screening and limits on lighting are needed to protect the glow worm colonies and buffer planting and regenerating areas on the fringes of the site. Lighting limits should be in keeping with levels that do not detract from the character of the open space or of the ecological corridor adjacent to the site.

3. Traffic and congestion

- The plan should include adequate provision for maintaining public access to the City to Sea walkway and for walking and cycle access to and past the site, and for parking for existing approved activities in Old Karori Road once the child care centre is fully operational. None of these appear to have been provided for.
- The traffic plan should take into account implications for increased traffic through Creswick Terrace. This is already a difficult road to navigate, with no pavement for children to walk to school. Many residents avoid driving up the road, but extra congestion on Curtis St will increase traffic through Northland, with knock on effects for residents, many of whose children walk to Northland school. Restrictions should be placed on activities that generate significant increases in traffic volume and parking, beyond that previously incurred by the former Kaori Garden Centre.

4. Environmental impacts including catchment impacts of run-off, soil contamination, impacts on flora and fauna

- More provisions should be put in place to protect the seepage wetlands and buffer vegetation, which the technical assessment within the Section 32 Report identify as being "regionally significant". A significant part of

- The impact of parking provision on the site, which would significantly increase the area of impervious surface on the site, would have implications for run-off through the culvert into the Kaiwharawhara Stream. This does not seem to have been taken into account.
- There is a high likelihood of contaminated soil already on site. There is insufficient protections for soil removal and site works. Soil should be assessed for contamination with any application for a resource consent for earthworks.
- The plan change should identify the scale and intensity of development that is unacceptable on this site.

5. Economic impacts

- The Section 32 Report Economic Impact assessment does not provide adequate analysis of the likely impact on existing Centres – specifically Northland, Marsden Village and Karori – of development of a new Business Area on this site. Future development of the site could displace existing businesses within nearby centres and impact on the viability of those centres. Unoccupied retail sites make attract vandalism and detract from the appeal of current centres.

6. Status of the concept plan

- Given the significant challenges with developing the site, I would like to see a Concept Plan be developed for the site. This plan should be obligatory and publicly notified. Failure to require a comprehensive Concept Plan for development of the site opens the possibility for incremental development to achieve a gross floor area significantly greater than 500m² without being subject to proper controls.

I SEEK THE FOLLOWING DECISION FROM THE COUNCIL *(Please give precise details.)*

1. Withdraw the proposed District Plan Change 77 providing for increased commercial activity in the western suburbs until any need for such provision not already provided by DPC73 has been demonstrated.
2. Give effect to Council's existing plan for this valley, namely to enhance the ecological corridor, as indicated in "future initiatives" of the Wellington Outer Green Belt Management Plan May 2004.
3. If the DPC 77 is not withdrawn, any new zone for the site should:
 - Provide specific rules to control the permissible development on the site to protect and maintain the existing vegetation on the western and eastern boundaries and to control the permissible development on the site to avoid any increase in volume, velocity, contaminant load or temperature of stormwater entering Kaiwharawhara Stream from the site.
 - Ensure that all noise levels, including fixed plant noise, should not exceed that set for residential areas.
 - Limit lighting to be in keeping with levels that do not detract from the character of the open space or of the ecological corridor adjacent to the site. Lighting levels for the site should not exceed that of outer residential areas.
 - Place restrictions on activities that generate significant increases in traffic volume and parking, beyond that previously incurred by the former Kaori Garden Centre. Note that the child care centre will significantly increase traffic on the site.
 - Provide adequate provision for maintaining public access to the City to Sea walkway and for walking and cycle access to and past the site, and for parking for existing approved activities in Old Karori Road once the child care centre is fully operational
 - Ensure soil be assessed for contamination with any application for a resource consent for earthworks.
 - Identify the scale and intensity of development that is unacceptable on this site.
 - Require a mandatory and publically notified comprehensive concept plan for the site.

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

JOINT SUBMISSIONS

I will consider presenting a joint case with others at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature Sarah Holden

Date 11 March 2013

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.