

Wellington City Proposed District Plan

Hearing Stream 6 Development Areas:

Development Area: Lincolnshire Farm

**Development Area: Upper Stebbings
and Glenside West**

Appendix 12 – Lincolnshire Farm Development Area

**Appendix 13 – Upper Stebbings and Glenside West
Development Area**

Section 42A of the Resource Management Act 1991

Document Information

REPORT FOR:

Independent Hearings Commissioners:

Trevor Robinson (Chair)
Robert Schofield
Liz Burge
David McMahon

SUBJECT:

**Wellington City Proposed District Plan –
Hearing Stream 6**

- Development Area: Lincolnshire Farm (DEV2)
- Development Area: Upper Stebbings and Glenside West (DEV3)
- Appendix 12 - Lincolnshire Farm Development Area (APP12)
- Appendix 13 – Upper Stebbings and Glenside West Development Area (APP13)

PREPARED BY:

Hannah van Haren-Giles

REPORT DATED:

19 January 2024

DATE OF HEARING:

20 February 2024

Executive Summary

- i. This report considers submissions received by Wellington City Council in relation to the objectives, policies, rules, definitions, appendices and maps of the Wellington City Proposed District Plan (PDP) Lincolnshire Farm Development Area (DEV2), Upper Stebbings and Glenside West Development Area (DEV3), Appendix 12 - Lincolnshire Farm Development Area (APP12), and Appendix 13 – Upper Stebbings and Glenside West Development Area (APP13).
- ii. There were 217 submission points received in relation to the Development Areas and Appendices 12 and 13 comprising 184 original submission points and 33 further submission points. The submissions received were diverse and sought a range of outcomes. The report outlines recommendations in response to the issues that have emerged from these submissions.
- iii. The following are the key issues in contention relating to both the Development Area chapters:
 - a. Whether greenfield development is sustainable and necessary to cater for future growth; and
 - b. Whether greenfield development can be undertaken in a truly sustainable manner within a carbon budget.
- iv. The following are the key issues in contention in the Lincolnshire Farm Development Area chapter and Appendix 12:
 - a. The suitability of the objectives, policies, rules and standards in this chapter;
 - b. The transport infrastructure required to support development in this area, including upgrades to existing infrastructure and future public transport and active modes of infrastructure;
 - c. Whether the PDP provides sufficient flexibility to respond to future detailed engineering and earthworks modelling in interpreting the Development Plan;
 - d. The location of roads and land use activities shown in the Development Plan; and
 - e. Whether specific requirements in relation to future school, community facilities and community park sites are reasonable.
- v. The following are the key issues in contention in the Upper Stebbings and Glenside West Development Area chapter and Appendix 13:
 - a. The suitability of the objectives, policies, rules and standards in this chapter;
 - b. Whether Glenside West should be included in the Development Area;
 - c. The protection of the Ridgetop from urban development and whether the Ridgelines and Hilltops Overlay from the ODP should apply within the Development Area;
 - d. The protection of natural features such as streams, gullies and native bush stands;
 - e. The transport infrastructure required to support development in this area, including the need for a new road connection between Upper Stebbings and Tawa;
 - f. The extent of the areas identified for residential activities in the Development Plan; and
 - g. Whether specific requirements in relation to a previously consented but unbuilt

intersection are reasonable.

- vi. This report addresses each of these key issues, as well as any other relevant issues raised in the submissions.
- vii. Appendix A of this report sets out the recommended changes to the Lincolnshire Farm Development Area, Upper Stebbings and Glenside West Development Area, Appendix 12 and Appendix 13 chapters in full. These recommendations take into account all of the relevant matters raised in submissions and relevant statutory and non-statutory documents.
- viii. Appendix B of this report details officers' recommendations on submissions, and whether those submissions should be accepted or rejected. The reasoning for these recommendations is set out in the body of this report.
- ix. For the reasons set out in the Section 32AA evaluation included throughout this report, the proposed objectives and associated provisions, with the recommended amendments, are considered to be the most appropriate means to:
 - a. Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
 - b. Achieve the relevant objectives of the Proposed District Plan, in respect to the proposed provisions.

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Interpretation

Table 1: Abbreviations

Abbreviation	Means
the Act / the RMA	Resource Management Act 1991
the Council	Wellington City Council
NSP-UD	National Policy Statement on Urban Development 2020
the Operative Plan/ODP	Operative Wellington City District Plan
the Proposed Plan/PDP	Proposed Wellington City District Plan
RPS	Wellington Regional Policy Statement 2013
Spatial Plan	Spatial Plan for Wellington City 2021
S32	Section 32 of the Resource Management Act 1991
S32AA	Section 32AA of the Resource Management Act 1991
DEV	Development Areas
DEV2	Development Area - Lincolnshire Farm
DEV3	Development Area - Upper Stebbings & Glenside West
FUZ	Future Urban Zone

1.0 Introduction

1.1 Purpose

1. This report is prepared under section 42A of the Resource Management Act 1991 (the **RMA**) to:
 - a. Assist the Hearings Panel in their role as Independent Commissioners in making their decisions on the submissions and further submissions on the Wellington City Proposed District Plan (the **PDP**); and
 - b. Provide submitters with information on how their submissions have been evaluated and the recommendations made by officers, prior to the hearing.

1.2 Scope

2. This report considers submissions received by the Council in relation to the relevant definitions, objectives, policies, rules, standards, and maps as they apply to the Lincolnshire Farm Development Area (DEV2), Upper Stebbings and Glenside West Development Area (DEV3), Appendix 12 - Lincolnshire Farm Development Area (APP12), and Appendix 13 – Upper Stebbings and Glenside West Development Area (APP13).
3. This report:
 - a. Discusses general issues;
 - b. Considers the original and further submissions received;
 - c. Makes recommendations as to whether those submissions should be accepted or rejected; and
 - d. Concludes with a recommendation for any consequential changes to the plan provisions or maps based on the assessment and evaluation contained in the report.
4. This report is intended to be read in conjunction with the Section 42A Assessment Report: Part A – Overview, which sets out the statutory context, background information and administrative matters pertaining to the District Plan review and PDP.
5. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report, or may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.

1.3 Author and Qualifications

6. My full name is Hannah Jane van Haren-Giles. I am a Senior Planning Advisor in the District Planning Team at Wellington City Council (the Council).
7. My role in preparing this report is that of an expert in planning.
8. I hold the qualification of Bachelor of Resource and Environmental Planning (First Class Honours) from Massey University. I am an Intermediate Member of the New Zealand Planning Institute.
9. I have five years' experience in planning and resource management, primarily as a consultant planner working for Hill Young Cooper Ltd. I have background in preparing and processing

district and regional resource consent applications, plan and policy development, reviewing and preparing submissions, and providing resource management advice to a range of clients including local authorities, industry groups, private sector companies, and individuals on various projects and planning processes.

10. My involvement with the Proposed Wellington City District Plan commenced in early 2020 when I was engaged to assist the Council with issues and options reports. I subsequently led the review and drafting of the Special Purpose Port Zone (including the Inner Harbour Port Precinct and Multi-User Ferry Precinct), Special Purpose Quarry Zone (including Kiwipoint Quarry Precinct), Special Purpose Stadium Zone, Hazardous Substances, and Contaminated Land chapters. I also authored the Section 32 Evaluation Reports for the Port Zone, Quarry Zone, Hazardous Substances, and Contaminated Land chapters.
11. Since joining the District Plan Team in July 2022 I have been involved in summarising submissions and further submissions, as well as developing the systems and database used to capture submissions and further submission points on the PDP.
12. I am also the reporting officer on the General Industrial Zone, Earthworks, Subdivision, Quarry Zone, Port Zone, Stadium Zone, Future Urban Zone, Natural Features and Landscapes, Hazardous Substances, and Contaminated Land chapters.

1.4 Code of Conduct

13. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court 1 January 2023. I have complied with the Code of Conduct when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
14. Other than when I state that I am relying on the evidence or advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
15. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.

1.5 Supporting Evidence

16. The expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report is as follows:

DEV2 Lincolnshire Farm

- a. [Lincolnshire Farm Structure Plan Open Space and Recreation Planning](#), PAOS, March 2021
- b. [Lincolnshire Farm Structure Plan Transport Review](#), Tonkin + Taylor, June 2021

DEV3 Upper Stebbings and Glenside West

- c. [Historic Heritage Study for the Upper Stebbings and Marshall Ridge Structure Plan](#),

- Elizabeth Cox (Bay Heritage Consultants), April 2018
- d. [Cultural Values Report – Upper Stebbings Valley and Marshall Ridge Structure Planning](#), Raukura Consultants, May 2018
 - e. [Upper Stebbings Valley Landscape and Ecology Analysis](#), Boffa Miskell, July 2018
 - f. [Stebbings Structure Plan - Upper Stebbings Concept Masterplan – Design Process and Thinking](#), Isthmus, February 2020
 - g. [Upper Stebbings and Glenside West Development Concept Transport Assessment](#), Tonkin + Taylor, October 2020
 - h. [Upper Stebbings and Glenside West – Glenside West Concept Masterplan – Design Process and Thinking](#), Isthmus, November 2020
 - i. [Upper Stebbings and Glenside West Development Concept](#), Wellington City Council, November 2020
 - j. [Upper Stebbings and Glenside West Engagement Summary](#), Wellington City Council, November 2020
 - k. [Upper Stebbings Valley Streams Extents – Existing, Lost and Piping](#), Orogen, 24 August 2021.
 - l. [Development Scheme Comparison of Common Metrics](#), Orogen, 12 April 2021
- Other
- m. [Statement of Expert Evidence](#) prepared by Dr Farzad Zamani (formerly Manager Urban Regeneration and Design), 26 May 2023

1.6 Key resource management issues in contention

17. Having read the submissions and further submissions, I consider that the following matters are the key issues in contention in the chapter:
- a. The suitability of the objectives, policies, rules and standards in each chapter;
 - b. The effects of greenfield development on the natural environment;
 - c. The alignment of the PDP provisions with the Proposed RPS Change 1;
 - d. The transport infrastructure required to support development in the Development Areas;
 - e. Whether the PDP provides sufficient flexibility to respond to future detailed engineering and earthworks modelling in interpreting the Development Plans; and
 - f. The suitability of Glenside West as a Development Area.

1.7 Procedural Matters

18. At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on the Development Areas.
19. A site visit to Lincolnshire Farm, Upper Stebbings and Glenside West was undertaken on 4

December 2023 to inform my understanding of the Development Areas' layout, topography, and surrounding environment. Mr Rod Halliday provided useful commentary and background on the Development Areas that helped me gain a better understanding of the submitter's position in determining appropriate recommendations in response to his submission. Upon my request following the site visit, Mr Halliday provided a detailed plan of his relief sought to amend the Glenside West Development Plan. This plan, prepared by Beca, is appended to my evidence and has informed my understanding of Mr Halliday's hand drawn plan of amendments to the Glenside West Development Area that was included in his submission.

20. There are not considered to be any other procedural matters to note.

2.0 Background and Statutory Considerations

2.1 Resource Management Act 1991

21. The PDP has been prepared in accordance with the RMA and in particular, the requirements of:
 - Section 74 Matters to be considered by territorial authority; and
 - Section 75 Contents of district plans.
22. As set out in the Section 32 Evaluation Report Part 1 – Context to Evaluation and Strategic Objectives, there are a number of higher order planning documents and strategic plans that provide direction and guidance regarding the preparation and content of the PDP. These documents and a comprehensive assessment of all relevant consultation and statutory considerations prior to public notification of the PDP are discussed in detail within the [Section 32 Report Future Urban Zone, Upper Stebbings and Glenside West Development Area and Lincolnshire Farm Development Area](#).

2.2 Schedule 1 and ISPP

23. As detailed earlier in the section 42A Overview Report, the Council has chosen to use two plan review processes:
 - a. The Intensification Streamlined Planning Process (ISPP) under Part 6 of Schedule 1 of the RMA for the intensification planning instrument (IPI). There are no appeal rights on ISPP provisions.
 - b. For all other PDP provisions and content, the standard Part 1 of Schedule 1 process of the RMA is used. Part 1 Schedule 1 provisions can be appealed.
24. For the Development Areas topic all the relevant provisions including APP12 and APP13 fall under the Part 1 Schedule 1 process.

2.3 Section 32AA

25. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA. Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or

a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

26. The required section 32AA evaluation for changes proposed as a result of consideration of submissions with respect to this topic is contained within the assessment of the relief sought in submissions in section 3 of this report, as required by s32AA(1)(d)(ii).
27. The Section 32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor, and consequential changes that improve the effectiveness of provisions without changing the policy approach have not been re-evaluated. Additionally, further re-evaluation has not been undertaken if the recommended amendments have not materially altered the policy approach.

2.4 Trade Competition

28. Trade competition is not considered relevant to the provisions of the PDP relating to this topic.
29. There are no known trade competition issues raised within the submissions.

3.0 Consideration of Submissions and Further Submissions

3.1 Overview

30. In total there were 217 points received in relation to the Development Areas (184 original submission points and 33 further submission points), as follows:
- a. 32 submission points received in relation to general points on Development Areas:
 - i. 8 original submitters who collectively made 24 submission points; and
 - ii. 2 further submitters who collectively made 8 further submission points in support or opposition to the primary submissions.
 - b. 50 submission points received in relation to DEV2:
 - i. 10 original submitters who collectively made 48 submission points; and
 - ii. 1 further submitter who made 2 further submission points in support or opposition to the primary submissions.
 - c. 102 submission points received in relation to DEV3:
 - i. 24 original submitters who collectively made 86 submission points; and
 - ii. 3 further submitters who collectively made 16 further submission points in support or opposition to the primary submissions.
 - d. 12 submission points received in relation to APP12:
 - i. 4 original submitters who collectively made 11 submission points; and
 - ii. 1 further submitter who made 1 further submission point.
 - e. 21 submission points received in relation to APP13:
 - i. 11 original submitters who collectively made 15 submission points; and
 - ii. 2 further submitters who collectively made 6 further submission points in support or opposition to the primary submissions.

3.1.1 Report Structure

31. Submissions on this topic raised a number of submission points that have been categorised in accordance with the general structure of PDP chapters as follows:
- a. General points on Development Areas
 - b. Development Area - Lincolnshire Farm – General points
 - c. Development Area - Lincolnshire Farm – Introduction
 - d. Development Area - Lincolnshire Farm – Objectives
 - e. Development Area - Lincolnshire Farm – Policies
 - f. Development Area - Lincolnshire Farm – Rules
 - g. Development Area - Lincolnshire Farm – Standards
 - h. Appendix 12 - Lincolnshire Farm Development Area
 - i. Development Area - Upper Stebbings and Glenside West - General points
 - j. Development Area - Upper Stebbings and Glenside West – Introduction

- k. Development Area - Upper Stebbings and Glenside West – Objectives
 - l. Development Area - Upper Stebbings and Glenside West – Policies
 - m. Development Area - Upper Stebbings and Glenside West – Rules
 - n. Development Area - Upper Stebbings and Glenside West – Standards
 - o. Appendix 13 - Upper Stebbings and Glenside West Development Area
32. I have considered substantive commentary on primary submissions contained in further submissions as part of my consideration of the primary submissions to which they relate.
33. In accordance with Clause 10(3) of the First Schedule of the RMA, the following evaluations have been undertaken for the purposes of this report:
- a. An issues and provisions, versus submission by submission, based evaluative approach, where a large number of similar submissions have been received.
 - b. A submission by submission evaluative approach, where a small number of submissions have been received.
34. Recommended amendments are contained in the following appendices:
- a. Appendix A – Recommended Amendments to the Development Area: Lincolnshire Farm (DEV2) Chapter, Development Area: Upper Stebbings and Glenside West (DEV3) Chapter, APP12 – Lincolnshire Farm Development Area, and APP13 – Upper Stebbings & Glenside West Development Area
 - b. Appendix B – Recommended Responses to Submissions and Further Submissions on the Development Area: Lincolnshire Farm (DEV2) Chapter, Development Area: Upper Stebbings and Glenside West (DEV3) Chapter, APP12 – Lincolnshire Farm Development Area, and APP13 – Upper Stebbings & Glenside West Development Area
35. Additional information can also be obtained from the [Section 32 Report Future Urban Zone, Upper Stebbings and Glenside West Development Area and Lincolnshire Farm Development Area](#), and the overlays and maps on the ePlan.
36. The following evaluation should be read in conjunction with the summaries of submissions and further submissions, along with the full submissions. Where there is agreement with the relief sought and the rationale for that relief, this is noted in the assessment section of the report, with the associated recommendation provided in the summary of submission table in Appendix B. Where a further evaluation of the relief sought in a submission(s) has been undertaken, the evaluation and recommendations are set out in the body of this report. A marked-up version of the Development Area chapters and appendices with recommended amendments in response to submissions is contained in Appendix A.

3.1.2 Format for Consideration of Submissions

37. The consideration of submissions has been undertaken in the following format:
- Matters raised by submitters;
 - Assessment; and

- Summary of recommendations.
38. The recommended amendments to the relevant parts of the PDP are set out in Appendix A of this report where all text changes are shown in a consolidated manner.
 39. The recommended acceptance or rejection of submissions (and accordingly further submissions) is set out in Appendix B.
 40. I have undertaken a s32AA evaluation in respect to the recommended amendments in my assessment that represent a material change from the policy direction in the proposed Development Area chapters.

3.2 General Points on Development Areas

3.2.1 Zoning matters

Matters Raised by Submitters

41. GWRC [351.315 and 351.316] recognises the efforts to mitigate potential environmental and cultural impacts of greenfield development through development planning, and to provide for SNAs, amenity, open space, bus services and mixed use activities (particularly in Lincolnshire Farms). GWRC seeks to ensure the Development Areas contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.
42. GWRC [351.317] questions whether greenfield development is necessary in the PDP at this stage and seeks that the following matters are considered:
 - a. the scale of intensification provided for within the existing urban footprint;
 - b. whether the proposed greenfield development areas can provide for well-functioning urban environments; and
 - c. the potential environmental and cultural impacts of greenfield development, for example the extensive earthworks required, and whether they can be appropriately mitigated while still providing appropriate amenities and density.
43. VicLabour [414.49] seeks that greenfield development be undertaken in a truly sustainable manner within a carbon budget.

Assessment

44. I acknowledge GWRC [351.315 and 351.316] seeking alignment with Objective 22 of the Proposed RPS Change 1, in my view the notified PDP provisions adequately address the characteristics and qualities of well-functioning urban environments (as defined in Objective 22), namely:
 - a. **Compact and well designed** – At a regional level, the two Development Areas support a compact urban form by providing development opportunities in reasonably close proximity

to the main employment centre for the region, the Wellington CBD. This reduces the need for greenfield expansion in the outer reaches of the region and in neighbouring regions. The Development Areas sit within the existing regional urbanised area and occupy a gap in the otherwise continuous urbanised corridor that stretches from the Wellington CBD to Porirua. The Development Areas are already connected to or adjoin the existing three waters and utilities networks; they are already served by the metropolitan rail network (at Takapu Road train station) and State Highway network and require no expansion of these networks. Closing the urban gap between Woodridge, Churton Park and Tawa is a logical location for urban growth and an efficient use of readily accessible land and existing infrastructure. At a local level, the notified PDP provisions require compact and well designed urban development including:

- i. **UFD-02** requires urban development in identified greenfield areas to make efficient use of land and to reinforce the City’s compact urban form.
 - ii. **DEV2-02** and **DEV3-02** (Activities and Development) require a compact urban form.
 - iii. **DEV2-03** and **DEV3-03** (Amenity and Design) require the creation of attractive and well-functioning urban environments that deliver compact urban form and a high level of accessibility and amenity.
 - iv. **DEV2-P1** and **DEV3-P4** (Coordinated Development) require all dwellings to be within walking distance of a neighbourhood park; connections to natural open spaces to be provided, and; safe and convenient access to well-connected transport network, including roads, public transport links and continuous walking and cycling routes, amongst others.
 - v. **DEV2-P5** and **DEV3-P5** (Amenity and Design) require new development to positively contribute to the creation of a well-functioning urban environment through the use of design guides and by adding visual diversity and interest through the overall street design and the form, landscaping, design and siting of buildings.
 - vi. **DEV2-S20** and **DEV3-S15** (Minimum density) support a compact urban form.
- b. **Sufficient development capacity** – The Development Areas provide development capacity in a location of known demand for residential and industrial activities.
- c. **Health, well-being and quality of life** – The Development Areas support this outcome through comprehensive, integrated development, including the provision of open spaces, public transport and active mode infrastructure and other facilities to support the local community. The provisions most relevant to this outcome are:
- i. **DEV2-P1** and **DEV3-P4** (Coordinated Development)
 - ii. **DEV2-P5** and **DEV3-P5** (Amenity and Design)
 - iii. For Lincolnshire Farm specifically: **DEV2-APP-R1** (Local centre), **DEV2-APP-R2** (School site), **DEV2-APP-R3** (Community facilities), **DEV2-APP-R4** (Open spaces) and **DEV2-APP-R6** (Bus services)
 - iv. For Upper Stebbings and Glenside West specifically: **DEV3-APP-R1** (Open spaces –

- Upper Stebbings), **DEV3-APP-R4** (Open spaces – Glenside West) and **DEV3-APP-R3** (Bus services)
- v. **INF-O5** (Transport network) which requires that the transport network supports the health and well-being of people.
- d. **Freshwater quality and quantity** – This outcome is addressed in the Three Waters chapter under **THW-O1** (Protecting water bodies and freshwater ecosystems).
 - e. **Management of air, land, freshwater, coast, and indigenous biodiversity** – These outcomes are addressed under a number of PDP chapters including: Ecosystems and Indigenous Biodiversity, Three Waters, Natural Features and Landscapes, Coastal Environment, etc.
 - f. **Low-emission and climate-resilient region** – The Development Areas at Lincolnshire Farm and Upper Stebbings and Glenside West are located within a short distance of the Wellington CBD, the largest centre of employment for the Wellington Region. The Development Areas are also in close proximity to existing and planned employment areas at Grenada North and Lincolnshire Farm. From a transport and accessibility perspective, the Development Areas thus provide a more sustainable location than more distant and less well-connected greenfield growth locations in the wider Wellington Region. The Development Areas sit on high grounds which are more climate-resilient locations than many low-lying or coastal areas in the region. The provisions most relevant to this outcome are:
 - i. **UFD-O2** requires urban development in identified greenfield areas to be well-connected to the public transport network.
 - ii. **DEV2-O2** and **DEV3-O2** (Activities and Development) require a compact urban form.
 - iii. **DEV2-P1** and **DEV3-P4** (Coordinated Development) require safe and convenient access to a well-connected transport network, including roads, public transport links and continuous walking and cycling routes that assist in reducing carbon emissions and traffic congestion. I note that the wording in relation to accessibility differs between these two policies and, later in this report, I recommend they are harmonised.
 - iv. **DEV2-S15** and **DEV3-S10** (Permeable Surface area) require at least 30% of the net site area is a permeable surface.
 - v. **DEV2-APP-R6** and **DEV3-APP-R3** (Bus services) require infrastructure be provided to support the extension of existing bus services within the Development Areas.
 - g. **Variety of home types, prices, and locations** – This outcome is addressed under **DEV2-P2** and **DEV3-P2** (Residential activities) which encourage a mix of detached and attached dwellings, including smaller one- and two-bedroom dwellings, and seek to avoid a pattern of homogenous housing types, sizes and densities.
 - h. **Māori values** – This outcome is addressed under the Sites and Areas of Significance to Māori chapter.
 - i. **Competitive land and development markets** – The Development Areas are located in areas

that have experienced sustained growth over the last decade and are anticipated to continue experiencing high demand. Enabling development in these locations supports the competitive operation of land and development markets in ways that improve housing affordability. The Development Areas are the only areas of greenfield land available for development in Wellington City. Without them, the land market would be limited in scale and type of development sites and would be less competitive.

- j. **Provide for commercial and industrial development close to where people live** – The Lincolnshire Farm Development Area contains land identified for General Industrial Activity which will provide local employment opportunities and contribute to the industrial land supply of Wellington City. The Lincolnshire Farm Development Area also includes a local centre where commercial activities (excluding integrated retail activities) are permitted (**DEV2-R19**). Upper Stebbings and Glenside West are within the catchment of an existing local centre (Churton Park) and consequently do not propose to enable commercial activities. This outcome is addressed under **DEV2-APP-R5** (General industrial activity area) which requires approximately 12 hectares of General Industrial land to be provided within the Lincolnshire Farm Development Area and **DEV2-APP-R1** (Local centre) which requires the local centre to provide for a supermarket and at least 6 commercial premises.
- k. **Multi-modal transport networks** – The Takapu Road train station is located close to the two Development Areas and provides a direct, frequent and quick (12 minutes journey time) public transport connection to the Wellington CBD – the main centre of employment, tertiary education, specialized health services and cultural establishments for the region – and to Porirua and other centres. The provisions most relevant to this outcome are:
 - i. **INF-05** (Transport network) requires the transport network improves connectivity, enabling people of all ages and abilities, and goods to move safely and effectively regardless of transport mode.
 - ii. **INF-P9** (Upgrading and development of the transport network) enables the upgrading and development of the transport network where, as far as practicable, it provides for high levels of connectivity within and between transport modes; provides for pedestrian, cycling and micromobility safety and connectivity; and provides transport corridors which allocate adequate space for walking, cycling, micromobility, public transport (including stops), loading and parking, vehicles movement, infrastructure and street trees.
 - iii. **TR-O1** requires that land use and development is managed to ensure that a range of transport modes are provided for; reliance on private vehicles is reduced; and new development provides appropriate on-site facilities for cycling and micromobility users.
 - iv. **DEV2-O3** and **DEV3-O3** (Amenity and Design) require a high level of accessibility.
 - v. **DEV2-P1** and **DEV3-P4** (Coordinated Development) require safe and convenient access to a well-connected transport network, including roads, public transport links and continuous walking and cycling routes. As previously noted, I address the discrepancy between the wording of these two policies later in this report.
 - vi. **DEV2-APP-R6** and **DEV3-APP-R3** (Bus services) require infrastructure be provided to

support the extension of existing bus services within the Development Areas.

45. In response to GWRC [351.317] questioning the identification of greenfield Development Areas in the PDP, I disagree for the following reasons:
- a. **Regional direction:** Upper Stebbings and Lincolnshire Farm were both identified as *Future Urban Areas* in the Wellington Regional Growth Framework¹, a spatial plan that was developed by iwi partners and local, regional, and central governments in the Wellington-Horowhenua region under the leadership of GWRC, and the predecessor to the Future Development Strategy (FDS). The greenfield Development Areas in the PDP give effect to the spatial planning undertaken at the regional level and endorsed by GWRC. I note however, that Lincolnshire Farm, Upper Stebbings, and Glenside West have not been identified in the Draft FDS 2023² as priority or future development areas. At the time of writing this s42A Report, the FDS hearings were underway with decisions yet to be made.
 - b. **Housing supply and choice:** The Proposed RPS Change 1 gives effect to the WRGF and states (amongst other items) that well-functioning urban environments allow for a greater supply and choice of housing close to where people work or to public transport. The Proposed RPS Change 1 states: *'The region is facing growth pressure. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA), the Greater Wellington urban environment is expected to grow by around 195,000 people by 2051. As of May 2022, district plans within the Greater Wellington region, do not provide sufficient development capacity for the long term with a shortfall of more than 25,000 dwellings.'*³ The identification of greenfield Development Areas in the PDP is part of Wellington City Council's response to increasing housing supply and choice.
 - c. **Well-functioning urban environments:** I have addressed this point in detail above. I consider that the Development Areas, by their location and form, contribute to a well-functioning urban environment at the regional and city level. At the local level, I consider that the notified Development Area provisions, by requiring comprehensive, integrated development, including the provision of open spaces, public transport and active mode infrastructure and other facilities to support the local community, will create well-functioning neighbourhoods.
 - d. **Potential environmental and cultural impacts:** Environmental and cultural considerations have informed the masterplanning of the Development Areas and I consider that the effects of development in accordance with the Development Plans can be appropriately managed through the PDP provisions and other planning instruments.
46. In response to VicLabour [414.49], while I am not an expert in carbon emission calculations, I understand that a carbon budget would be complex to administer if accounting for embedded carbon in construction materials, carbon released during the construction phase and post-construction carbon emissions. It would not be possible to account for all carbon emissions at the resource consent stage as construction materials may not be confirmed until the building consent

¹ [Wellington Regional Growth Framework](#), July 2021.

² [Draft Wairarapa-Wellington-Horowhenua Future Development Strategy](#), September 2023.

³ <https://www.gw.govt.nz/assets/Documents/2022/08/Proposed-RPS-Change-1-for-the-Wellington-Region.pdf> page 78, accessed 2/06/2023.

stage and other critical details such as where materials may be sourced from and how they may be transported to the site would not be confirmed until a builder has been appointed. As such, I do not consider that assessing development proposals against a carbon budget at the resource consent stage is practicable. I therefore disagree with the relief sought.

Summary of Recommendations

47. **HS6-DEV-Rec1:** No amendments are recommended to the Development Areas in response to submissions on general points.
48. **HS6-DEV-Rec2:** That submission points relating to General Points on Development Areas are accepted/rejected as detailed in Appendix B.

3.3 General Points on DEV2

3.3.1 DEV2 Mapping

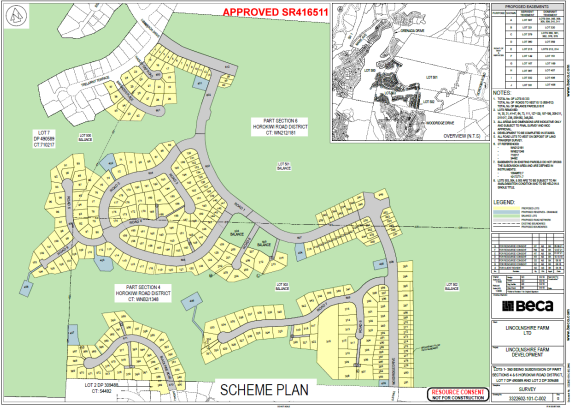
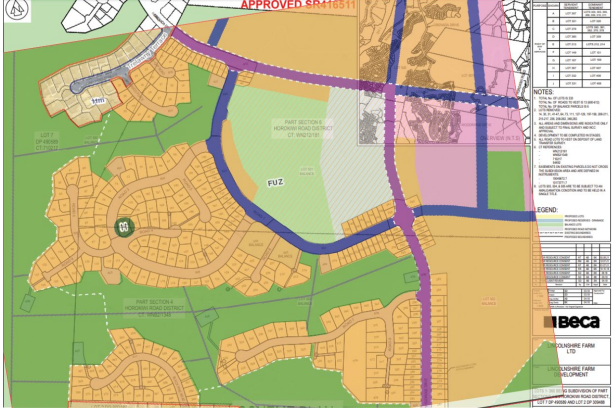
Matters Raised by Submitters



49. WCC [266] opposed by Panorama Property Limited [FS11.34, FS11.35, and FS11.37] seek changes to the Development Plan maps and legends for the purposes of clarification, and better cross-referencing and linkage to the related District Plan appendices, as follow:
 - a. [266.40] amend the Development Plan legend to add a letter reference that matches the letters shown on the maps i.e. A – J. The legend should state these letters relate to: ‘neighbourhood park catchment’.
 - b. [266.41] amend the Development Plan legend from ‘Neighbourhoodpark’ to ‘Neighbourhood park (approx. location)’ for the purposes of clarification; and
 - c. [266.43] amend the map so the location of the letters A – J are moved to be generally in the centre of the white dashed catchment areas.
50. Rod Halliday [submitter 25] has sought a number of amendments to the DEV2 planning maps. Given the volume of amendments sought, for clarity and ease of assessment, I have assessed Mr Halliday’s relief sought and my recommended response in Table 1 below.



Assessment


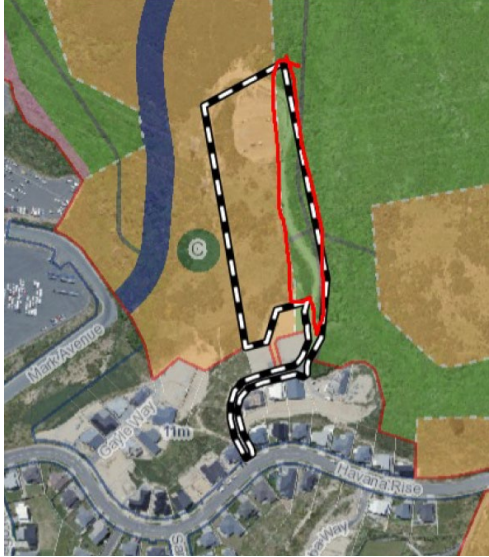
51. I agree with Wellington City Council [266.40, 266.41, and 266.43] that the minor amendments will make the PDP clearer.
52. Table 1 below summarises the relief sought by Mr Halliday to amend the DEV2 Development Plan maps and my assessment and recommended response.

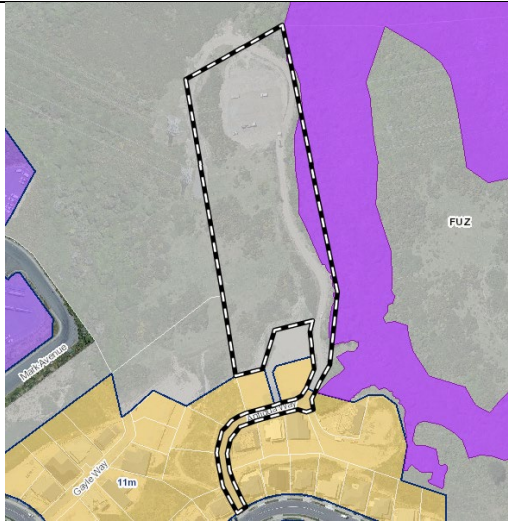

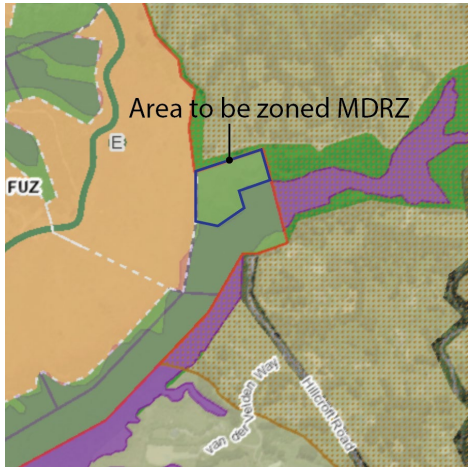
Table 1: DEV2 mapping assessment

Summary of Relief Sought	Assessment and Recommendation
<p>[25.5] Seeks amendments to the Development Plan so the road alignment reflects an approved 360 lot subdivision plans (SR No. 416511) and [25.6] seeks amendments to the Development Plan so the location of the Grenada Drive and Woodridge Drive intersection is extrapolated from the plan approved under resource consent SR No. 416511.</p> 	<p>I agree with the intent of the submission seeking road alignment in the Development Area with approved plans. However, I have overlaid the Development Plan and the consented subdivision and find that the two coincide perfectly (see figures below). Therefore, the current Development Plan already incorporates the consented roads and there is no need for any amendments.</p> 
<p>[25.8] Seeks amendments to the Development Plan so the location of the collector road in the vicinity of 160 Lincolnshire Road (see figure below) reflects an approved subdivision for three commercial lots (SR No. 479845).</p> <p>Point 21.3: We submit there is a better alignment/location for the collector road through this part of the development area. We currently have earthworks consent to development this area (SR479845) and these works will commence in Oct 2022. However, given this land is now proposed to be rezoned for residential use, and we now know from our earthworks design that the road (shown crossed) will terminate at a cut face, we believe the road would better be built higher up where it can get on top of the land and loop back onto Stony Hill Place. Whilst the first part of the road in its current location can be built on flat land, to continue this road on in the future will require cut batters either side, which given the recent slips in Wellington, will have result in resilience challenges. As such we proposed the new position.</p>	<p>I agree in part as to the amendments to the location of a collector road. I accept that the location of the road shown on the Development Plans may not be feasible and that, as indicated by Mr Halliday, if the road was to terminate at a cut face, it would not achieve the connectivity objectives of the Development Plan.</p> <p>I note that the Development Area anticipates that more detailed design is required to set the precise location of roads and provides flexibility accordingly. The road layout should be informed by detailed earthworks modelling and road engineering as part of a resource consent application where the proposed road layout, earthworks, drainage arrangements, walking and cycling arrangements, open spaces and other features can be considered together. I consider that there is not sufficient information at this time to amend the location of the road as suggested. However, I understand from visiting the site that detailed earthworks modelling was being progressed. If these plans are available and the alignment of the road as sought by Mr Halliday were able to be accurately identified on the Development Plan, this would be my preference.</p> <p>However, as an alternative to reduce future uncertainty at the consent stage, I recommend that the road Mr Halliday has identified as not feasible be deleted from the Development Plan. I also recommend that more detail be added to DEV2-P1 to clarify the expectations in relation to</p>

Summary of Relief Sought	Assessment and Recommendation
	<p>the road network, especially in relation to the creation of a connected street grid, with cross-roads, short block lengths and avoiding long cul-de-sacs as much as practicable given the topography.</p>
<p>[25.9] Considers that the edge of the Medium Density Residential Zone in the Development Plan should be amended to reflect the boundaries based on the plan approved under resource consent SR No. SR416511.</p> 	<p>I agree in part the amendment sought. Mr Halliday seeks to have part of a balance lot currently shown as Natural Open Space Area in the PDP shown as Medium Density Residential Area. I note that part of this balance lot is located within the National Grid (12m buffer from centreline of transmission line). I also note that lot 404 is identified as a “Proposed Reserve – Drainage” in the approved plans for resource consent SR 416511 (see figure below). I consider that refinements to the zoning are acceptable so a residential lot can be created (see figure below) outside the National Grid and the areas within the National Grid, including lot 404, are identified as Natural Open Space. My reasons for finding this amendment acceptable are:</p> <ol style="list-style-type: none"> a. The purpose of the small green spaces is to provide visual and pedestrian connectivity between the reserves network and the surrounding streets. The consented drainage reserve and adjacent land under within the National Grid can achieve equivalent connectivity outcomes to the small green space shown on the notified Development Plan. b. The area to be re-zoned for Medium Density Residential is relatively flat, does not contain streams or natural features of values and is not needed to achieve a minimum level of provision for open spaces due to the extensive areas of Natural Open Space identified throughout the Development Area. c. Enabling the creation of a residential lot west of the National Grid makes efficient use of greenfield land.

Summary of Relief Sought	Assessment and Recommendation
	 <p data-bbox="726 609 1380 676"><i>Extract from SR416511 showing lot 404 Proposed Reserve – Drainage.</i></p>  <p data-bbox="726 1160 1364 1227"><i>Figure 1 Extract from SR416511 showing National Grid in relation to balance lot and potential residential lot (in red)</i></p>
<p data-bbox="114 1281 678 1541">[25.11] Considers that 305 Mark Avenue (Lot 11 DP 544975) should not be shown as General Industrial as this is located over a stream and on steep, undevelopable land. Mr Halliday seeks amendments to the Development Plan so the majority of this area is identified as Natural Open Space.</p> <p data-bbox="114 1568 678 1675">[25.12] Seeks that a portion of the area by 305 Mark Avenue shown as Open Space be amended to Medium Density Residential.</p>	<p data-bbox="726 1281 1364 1388">I agree with Mr Halliday that the narrow sliver of land identified is unlikely to be developed for industrial activity and should therefore be identified as Natural Open Space.</p> <p data-bbox="726 1433 1412 1765">However, I disagree with Mr Halliday seeking amendments to the Development Plan so that some land in the vicinity of 305 Mark Avenue be rezoned from Natural Open Space to Medium Density Residential. I assume the intent of this submission is to ‘shift’ the proposed green corridor south and thus to extend the Medium Density Residential Area north of this green corridor. I do not agree that the green corridor can simply be moved southwards as suggested. The boundaries of the open space on the Development Plan were informed by:</p> <ul style="list-style-type: none"> <li data-bbox="774 1769 1412 1836">a. The location of streams as shown in the Council's GIS maps and <li data-bbox="774 1841 1412 1877">b. The location of overhead power lines. <p data-bbox="726 1881 1412 2020">Extending the residential area into the open space area may result in land being identified for housing that is in fact not suitable for this purpose due to the presence of streams. The precise boundary between Natural Open Space and Medium</p>

Summary of Relief Sought	Assessment and Recommendation
	<p>Density Residential areas should be agreed as part of a resource consent process on the basis of more detailed stream surveys. The Development Area provisions provide the flexibility for consenting development which differs from the precise lines contained in the Development Plan.</p>
<p>[25.16] Seeks that part of the lot at 15 Antigua Way shown in the PDP as Natural Open Space be shown as Medium Density Residential.</p> 	<p>I agree in part that more of the lot at 15 Antigua Way be shown as Medium Density Residential instead of Natural Open Space, however, I do not agree that the entire lot can be identified for Medium Density Residential. My reasons are:</p> <ol style="list-style-type: none"> a. The Development Area contains extensive areas which were identified as Natural Open Space due to the presence of streams, steep topography or Significant Natural Areas. The provision of Natural Open Space across the Development Area is more than adequate and therefore, land which is not affected by any such constraints should be identified for urban development. This makes efficient use of the limited greenfield land available in Wellington City. b. There is a Significant Natural Area running along and across the eastern boundary of this lot. Elsewhere in the Development Area, Significant Natural Areas are identified as Natural Open Space and this logic should be retained here. <p>Therefore, I consider that most of the lot at 15 Antigua Way can be identified for Medium Density Residential activity but the part of the site which sits under the Significant Natural Area overlay should remain as Natural Open Space.</p>

Summary of Relief Sought	Assessment and Recommendation
	
<p>[25.17] Considers that there is additional land in the north-east corner of the Lincolnshire Farm Development Area (see figure below) that does not contain high quality native bush, is suitable for residential development and should be re-zoned accordingly.</p> 	<p>I agree that it is appropriate to amend the area of land identified in the north-east corner of the Lincolnshire Farm Development Area as Medium Density Residential instead of Natural Open Space. My reasons are:</p> <ol style="list-style-type: none"> This area does not contain streams or natural features of value. The Development Area contains more than sufficient provision of Natural Open Space due to the extensive network of Significant Natural Areas present in this location⁴. Enabling development of this land for residential activity makes for efficient use of greenfield land. 

⁴ Lincolnshire Farm Structure Plan Open Space and Recreation Planning, PAOS (March 2021), Pages 2, 8 and 9 state that there are large ‘nature’ reserves surrounding Lincolnshire Farm (Caribbean Avenue Reserve, Seton Nossitor Park, Waihinahina Reserve, Hillcroft Road Reserve). These are in addition to the extensive nature reserves within the Development Area.

Summary of Recommendations

53. **HS6-DEV-Rec3:** That the DEV2 Development Plan map be amended as identified in Appendix D.
54. **HS6-DEV-Rec4:** That submission points relating to DEV2 mapping are accepted/rejected as detailed in Appendix B.

3.3.2 General Points on DEV2

Matters Raised by Submitters

55. VUWSA [123.62] support the Lincolnshire Farm Development Area.
56. Wellington City Youth Council [201.40] seek that **DEV2** is retained as notified.
57. Waka Kotahi [370.448 and 370.449] support **DEV2** but seek amendments to make development in **DEV2** conditional on infrastructure upgrades being completed, including access onto the Johnsonville Porirua Motorway (SH1) at the Grenada Drive intersection. Waka Kotahi also seek to include specific reference to all development within **DEV2** to facilitate multi-modal connections. In particular Waka Kotahi consider the following amendments are required:
 - a. *Access on to the Johnsonville Porirua Motorway (SH1) at the Grenada Drive intersection may require upgrades to ensure no level of service deficiency as identified in the “Lincolnshire Farm Transport Review – June 2021 Tonkin and Taylor Ltd”. Further investigation should be made into this. Development should be managed until such time that appropriate mitigation has been determined or funding identified.*
 - b. *Needs a specific to integrated transport including multi-modal connections needs to be provided for. DEV-O2 and DEV-O3 generally direct development to consider integration but it is not explicit to transportation.*

Assessment

58. I agree in part with Waka Kotahi [370.448 and 370.449]. I agree that the requirements for multi-modal connections are not sufficiently expressed in the current provisions and that multi-modal transport connections must be provided to support development within the Development Area. This matter is further addressed in response to submission points on DEV2-P1.
59. As part of this, in order to enable the provision of public transport, cycling and walking facilities in the Development Area and connectivity to the surrounding transport network, I consider that the classification of part of Grenada Drive (east of the Mark Avenue roundabout) and Woodridge Drive (north of the Cedarwood Street roundabout) should be changed from ‘Local Street’ to ‘Urban Connector’ (under the Road Classification layer in the PDP map) to reflect their intended future role as multi-modal corridors. In the Infrastructure Chapter, the ‘Urban Connector’ road classification sets minimum standards for footpaths and cycleways on each side of the road, and space for ‘build-outs’ for bus stops, loading bays, street trees, and active and micromobility transport infrastructure. I consider that the matter of road classifications is more appropriately addressed in Hearing Stream 9 as part of the Infrastructure chapter s42A Report, particularly as parts of Grenada and Woodridge Drive extend beyond the Development Area.

60. Turning to Waka Kotahi's [370.448 and 370.449] relief to require that planned development only occur once upgrades to the State Highway 1 and Grenada Drive intersection have been completed, I disagree. My reasons for this are:

- a. **Upgrade not warranted:** On my reading of the Tonkin and Taylor Lincolnshire Farm Structure Plan – Transport Review (June 2021), I understand that Grenada Drive (to motorway) in its current form has capacity for 3,000 vehicle movements per hour (vph) which is double the capacity of 1,500 vph anticipated to be required when the Lincolnshire Farm Development Area is fully developed, leaving 50% spare capacity⁵. Restricting growth in the Development Area prior to an upgrade being warranted is therefore, in my view, unjustified.
- b. **Sustainable transport modes:** WCC's transport strategy is to facilitate a shift away from travel by private vehicles through greater use of public transport and active transport modes. This is evidenced in the Long-term Plan⁶, the Sustainable Transport Hierarchy⁷ and Te Atakura First to Zero – Wellington's blueprint for a Zero Carbon Capital⁸. As such, the Council does not normally seek to increase existing road capacity for general traffic. It follows that the Council accepts that there may be some level of congestion and delays on certain roads at peak times. Road users have options to avoid congestion and delays by using other modes of transport or changing their choice of route or time of travel. The adverse effect of congestion on some road users does not, in my view, override the beneficial effects of additional housing supply in close proximity to existing areas of employment and local services.
- c. **Principal road:** The Lincolnshire Farm Development Area makes provision for a 'principal road' to connect the existing bus service in Woodridge with the planned local centre in Lincolnshire Farm and with Takapu Road train station, via Grenada North. Under **INF-S13** Design of Roads and Table 1 – INF: Design of Roads – One Network Framework, this road is classified as an "Urban Connector" and must include footpaths (2 X 1.8m minimum width) and cycle lanes (2 X 2.0m minimum width). The walking and cycling facilities along this 'urban collector' road, as well as tracks through reserves, are planned to provide convenient connections to the train station, bus stops, local centre and school. This 'principal road', by providing an alternative to the State Highway for accessing neighbouring areas to the north and south, and by providing access to train and bus services, should help reduce future pressure on the existing interchange. I note that the bus services are anticipated to run along the principal road, and not to travel along State Highway 1, as evidenced by **DEV2-APP-R6** which details bus infrastructure requirements for both principal and collector roads within the Development Area.
- d. **Already enabled growth area:** Development in the Lincolnshire Farm area is already underway as enabled by the Lincolnshire Farm Structure Plan which became operative in 2013. Requiring any further development in the area to be conditional on a State Highway

⁵ Tonkin and Taylor Lincolnshire Farm Structure Plan – Transport Review (June 2021), Table 14, page 44.

⁶ Tō mātou mahere ngahuru tau Our 10-Year Plan, Wellington City Council (Adopted June 2021), page 19.

⁷ Te Atakura First to Zero - 2022 Update, Wellington City Council (2022), page 15.

⁸ Te Atakura First to Zero – Wellington's blueprint for a Zero Carbon Capital, Wellington City Council (Adopted June 2019), page 34.

interchange upgrade would create a more restrictive planning regime under the PDP than under the ODP. This would be contrary the objectives of the NPS-UD in relation to supporting competitive land markets (objective 2), enabling more people to live in areas of an urban environment near many employment opportunities and where there is high demand for housing (objective 3), being responsive to proposals that would supply significant development capacity (objective 6), and supporting reduction in greenhouse gas emissions (objective 8).

- e. **Third party investment:** Delaying development until road upgrade(s) have been undertaken may lead to investment in any future transport upgrade(s) not being prioritised by Waka Kotahi. The lack of urban growth and transport demand would mean other transport projects would take priority. The developer(s) in the Development Area would be inhibited by investment decisions they and the Council do not influence.
 - f. **Blanket measure:** If Waka Kotahi provides new evidence of a demonstrable need for upgrading the Grenada Drive SH1 interchange to cater for the Lincolnshire Farm Development Area, the Panel may consider a requirement of limited notification to Waka Kotahi for when urban development exceeds a threshold. Waka Kotahi could then either oppose or seek conditions on resource consent applications as may be relevant at the time. This would be a more suitable approach to manage the effects on the State Highway network than a blanket postponement of development within an existing (under the ODP) and long-established Development Area. However, as stated in points a) to c) above, there is currently no evidence to support an upgrade based on the information available to the Council and no information has been provided by Waka Kotahi demonstrating the need for an upgrade.
61. In considering the submission of Waka Kotahi [370.448 and 370.449] I consider that in order to enable the provision of public transport, cycling and walking facilities in the Development Area and connectivity to the surrounding transport network, the classification of part of Grenada Drive (east of the Mark Avenue roundabout) and Woodridge Drive (north of the Cedarwood Street roundabout) should be amended from “Local Street” to “Urban Connector” (under the Road Classification layer in the PDP map) to reflect their intended future role as multi-modal corridors. In the Infrastructure Chapter, the Urban Connector Road classification sets minimum standards for footpaths and cycleways on each side of the road, and space for ‘build-outs’ for bus stops, loading bays, street trees, and active and micromobility transport infrastructure.

Summary of Recommendations

- 62. **HS6-DEV-Rec5:** No amendments are recommended to DEV2 in response to submissions on general points.
- 63. **HS6-DEV-Rec6:** That submission points relating to DEV2 general matters are accepted/rejected as detailed in Appendix B.

3.3.3 DEV2 Introduction

Matters Raised by Submitters

64. WCC [266.162] seeks to add a paragraph to the introduction of **DEV2** to provide for the construction of a new link road between Jamaica Drive and Mark Avenue, as shown in the Development Plan. This is *“to prevent unnecessary resource consenting impeding the progression of the road once this is ready for construction.”* The proposed paragraph is as follows:

The new roading connection between Jamaica Drive and Mark Avenue is essential infrastructure that is required to implement the Development Plan. This connection will ensure that the Lincolnshire Farm neighbourhood centre, school, and community hub will be accessible to the whole community and have a viable catchment; and the residents of Lincolnshire Farm will have public transport, cycling and vehicular access to Takapu Train Station. An alternative transport route to State Highway 1 and Willowbank Road / Middleton Road will add resilience to the road network.

65. Transpower [315.187] seek an amendment to the introduction of **DEV2** to reference the National Grid transmission lines to highlight their existence to plan users, as follows:

...

There are limited areas suitable for greenfield development in Wellington City so they must be used efficiently, providing medium density where practical and ensuring that there are a variety of housing types to suit different needs. It is crucial that the area is designed comprehensively so that infrastructure, services and facilities are provided in the most suitable location and are planned to service the entire neighbourhood. Existing transmission lines traverse the site, and any development must be appropriately managed to ensure the National Grid is not compromised. A local centre is intended to act as a focal point and meeting space for the neighbourhood and provide community services including local shops, hospitality venues, and a supermarket. An industrial business area is included to provide local employment opportunities and contribute to the industrial land supply of Wellington City. Bus, cycle, and walking infrastructure should be planned from the outset and integrated into the design of the earthworks and subdivision. Water sensitive design methods will be used which will benefit water quality and reduce impacts from runoff.

66. Rod Halliday [25.35, 25.36, and 25.37] generally supports **DEV2**, but seeks that the sentence *“The location of the map lines indicating boundaries between activity areas or location of roads and special features are not intended to be immovable”* in the introduction be highlighted.

Assessment

67. I agree with WCC [266.162] seeking the inclusion of a new paragraph to the introduction as this better reflects the notified Development Plan which shows the collector road.
68. I agree with Transpower [315.187] seeking an amendment to the introduction to note the presence of the National Grid transmission lines as this is a known development constraint. I also consider that acknowledgement of the National Grid in the introduction provides clarity to plan users and aligns with the NPS-ET’s objective of managing the adverse effects of the network and managing the adverse effects of other activities on the network as required by NPS-ET Policy 2 and Policy 10.

69. In response to Rod Halliday [25.35, 25.36, and 25.37] I note that the matter of flexibility is addressed under **DEV2-P1** (Coordinated Development) which provides flexibility for development and subdivision in the Lincolnshire Farm Development Area while among other matters, ensuring that *Development is undertaken in general accordance with the location and extent shown on the Development Plan in the Planning Maps*.
70. I acknowledge that the best location for roads and boundaries between activity areas will need to be informed by detailed earthworks modelling which may reveal that activities and special features i.e. neighbourhood parks, should be consented outside of where they are indicated in the Development Plan. While these features are not intended to be immovable, my understanding having visited the site and read Mr Halliday's submission, is that the Development Plan is well informed and reflective of development aspirations of both the Council and developer, and that there are detailed earthworks modelling and site investigations to inform this. Irrespective of this, in my view, the phrasing 'in general accordance' in **DEV2-P1** already provides a level of 'wiggle room'. In addition, the DEV2 rule framework allows for flexibility through the consenting pathway, albeit development in accordance with the Development Plan will have an easier consenting pathway. However, my new recommended rule **DEV2-R1.3**, as discussed in section 3.6.1, would enable consideration of activities that are not in general accordance with the Development Plan as a discretionary activity. For these reasons, I disagree with the relief sought.

Summary of Recommendations

71. **HS6-DEV-Rec7:** That the DEV2 introduction is amended as set out below and detailed in Appendix A:

...

There are limited areas suitable for greenfield development in Wellington City so they must be used efficiently, providing medium density where practical and ensuring that there are a variety of housing types to suit different needs. It is crucial that the area is designed comprehensively so that infrastructure, services and facilities are provided in the most suitable location and are planned to service the entire neighbourhood. Existing transmission lines traverse the site, and any development must be appropriately managed to ensure the National Grid is not compromised. A local centre is intended to act as a focal point and meeting space for the neighbourhood and provide community services including local shops, hospitality venues, and a supermarket. An industrial business area is included to provide local employment opportunities and contribute to the industrial land supply of Wellington City. Bus, cycle, and walking infrastructure should be planned from the outset and integrated into the design of the earthworks and subdivision. Water sensitive design methods will be used which will benefit water quality and reduce impacts from runoff.

The Development Plan and requirements in the Planning Maps and Appendix 12 shows the extent and location of each activity area, the requirements to be incorporated into design of aspects of the Development Area, as well as an indication of where special features should be located. The location of the map lines indicating boundaries between activity areas or location of roads and special features are not intended to be immovable. The best location for roads and building platforms will need to be informed by detailed earthworks modelling which may reveal that activities and special features should be consented outside of where they are indicated on the Development Plan. Extensive earthworks are anticipated to facilitate the Development Plan with earthworks minimised where practicable through subdivision and building design.

The new roading connection between Jamaica Drive and Mark Avenue is essential infrastructure that is required to implement the Development Plan. This connection will ensure that the Lincolnshire Farm neighbourhood centre, school, and community hub will be accessible to the whole community and have a viable catchment; and the residents of Lincolnshire Farm will have public transport, cycling and vehicular access to Takapu Train Station. An alternative transport route to State Highway 1 and Willowbank Road / Middleton Road will add resilience to the road network.

72. **HS6-DEV-Rec8:** That submission points relating to the DEV2 introduction are accepted/rejected as detailed in Appendix B.

3.4 DEV2 Objectives

3.4.1 DEV2-01, DEV2-02, DEV2-03, DEV2-04

Matters Raised by Submitters

73. WCC [266.163] seek to add a new objective to support the construction of the link road between Jamaica Drive and Mark Avenue, as shown in the notified Development Plan, and generally to support access and connection across the Lincolnshire, Grenada North and Woodridge areas, as follows:

DEV2-O5 Access and connection

New communities at Lincolnshire Farm are well connected with each other and with the adjoining communities in Grenada North and Woodridge to increase their resilience and accessibility.

Assessment

74. In response to WCC [266.163], I consider that the proposed objective reflects a key aim of the Lincolnshire Development Area and is consistent with the notified Development Plan. Good access and connection to adjoining neighbourhoods is necessary to ensure future community resilience and accessibility. The proposed objective would align with the Strategic Direction of the PDP, in particular UFD-O2 which directs that urban development in identified greenfield areas is well-connected to the public transport network and reinforces the City's compact urban form.

Summary of Recommendations

75. **HS6-DEV-Rec9:** That DEV2-O1, DEV2-O2, DEV2-O3, DEV2-O4 be confirmed as notified.
76. **HS6-DEV-Rec10:** That a new objective DEV2-O5 be added to DEV2 as set out below and detailed in Appendix A:

DEV2-O5 Access and connection

New communities at Lincolnshire Farm are well connected with each other and with the adjoining communities in Grenada North and Woodridge to increase their resilience and accessibility.

77. **HS6-DEV-Rec11:** That submission points relating to DEV2 objectives are accepted/rejected as detailed in Appendix B.

Section 32AA Evaluation

78. I have undertaken a single Section 32AA evaluation for all the objective and policy amendments in relation to the Lincolnshire Farm transport network in **section 3.5.1 below**. I have combined the evaluation due to the interconnected nature of these changes and to avoid repetition.

3.5 DEV2 Policies

3.5.1 DEV2-P1, DEV2-P2, DEV2-P3, DEV2-P4, DEV2-P5, DEV2-P6

Matters Raised by Submitters

79. The Ministry of Education [400.153] seeks that **DEV2-P1** (Coordinated Development) is retained as notified.

80. WCC [266.164] seeks to amend **DEV2-P1** (Coordinated Development) to reflect the new objective relating to the link road, as follows:

Provide flexibility for development and subdivision in the Lincolnshire Farm Development Area while ensuring that:

...

9. A continuous road connection is provided across the Lincolnshire Farm Development Area connecting Jamaica Drive to Mark Avenue and Grenada Drive to Woodridge Drive, in general accordance with the alignment shown on the Development Area Plan;

81. GWRC [351.318] seeks to amend **DEV2-P1** (Coordinated Development) to align with what is included in the DEV2 policies and signal the importance of including public transport and active modes in developments, as follows:

Provide flexibility for development and subdivision in the Lincolnshire Farm Development Area while ensuring that:

...

8. The road and access network provides high connectivity ~~key connections to a well-connected transport network, including roads, public transport links and walking and cycling routes that assist in reducing carbon emissions and traffic congestion and~~ provide a high quality street environment for people.

82. The Ministry of Education [400.154] seeks that **DEV2-P4** (Sensitive activities within the Industrial Area) is retained as notified.

83. Kāinga Ora [391.745 and 391.746] seek to amend **DEV2-P5** (Amenity and Design) to remove direct reference to the design guides (note: Kāinga Ora's relief only showed deletion of reference to the Residential Design Guide) and instead articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPS-UD, as follows:

DEV2-P5 Amenity and Design

Require new development, and alterations and additions to existing development in the Lincolnshire Farm Development Area to positively contribute to the creation of a well functioning urban environment by ensuring that it:

~~1. Fulfills the intent of the Residential Design Guide, Centres and Mixed Use Design Guide and Residential Design Guide; and~~ Achieves the following urban design outcomes:

- a. Provides an effective public private interface;
- b. The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;
- c. Provides high quality buildings.
- d. Responds to the natural environment.

2. Adds visual diversity and interest through the overall street design and the form, landscaping, design, and siting of buildings.

Assessment

84. In response to WCC [266.164] seeking the inclusion of a new clause in **DEV2-P1** relating to the link road, I consider this is consistent with the notified DEV2 Development Plan. In my view, a continuous road connection is necessary to support the extension of public transport services and the cycle network through the Development Area and to Takapu Road train station as anticipated by the Development Plan. The proposed new clause also responds to the new objective **DEV2-O5** sought by WCC and will provide a clear provision framework to support the Development Plan. However, it is worthwhile to note that while the policy sets this requirement for a road connection to be provided in general accordance with the Development Plan, the DEV2 chapter itself does not include any 'trigger' or requirement that the link road be constructed. This matter is expanded on further in section 3.6.1.
85. I also consider that the amendment sought by WCC responds to Waka Kotahi [370.449] seeking requirements for multi-modal connections to be made explicit in the Development Area. On this basis, I agree with WCC and recommend the proposed wording sought by WCC is expanded to include: *'and that caters for a future bus service and continuous walking and cycling networks linking Lincolnshire Farm with Woodridge and Grenada North.'*
86. In response to GWRC [351.318] seeking amendments to **DEV2-P1** to signal the importance of including public transport and active modes in developments, I agree. This is consistent with the strategic direction of the PDP namely UFD-O2 which requires 'urban development in identified greenfield areas is well-connected to the public transport network' and UFD-O7 which requires development 'supporting sustainable travel choices, including active and micromobility modes'. It is also consistent with INF-O5.3 (Transport network) which requires 'the transport network supports the health and well-being of people'. I recommend aligning the wording of DEV2-P1.8 with DEV3-P4.2, the equivalent clause in the Upper Stebbings and Glenside West chapter.
87. Turning to Kāinga Ora [391.745 and 391.746] seeking amendment to **DEV2-P5** (Amenity and design) to remove direct reference to design guides, I agree in part. I agree that reference to the Subdivision Design Guide be deleted on the basis of Ms Stevens and my recommendation to delete the Subdivision Design Guide in its entirety as part of the ISPP Wrap Up Hearing.⁹ Ms Stevens and I also recommended deletion of references to the Subdivision Design Guide in **DEV2-P2.4** and **DEV2.P5.1**.¹⁰
88. However, I disagree with Kāinga Ora [391.745 and 391.746] as to the removal of references to the Centres and Mixed Use Design Guide and Residential Design Guide in **DEV2-P5** for the following reasons:
- a. The suite of design guides (Centres and Mixed Use Design Guide and Residential Design Guide) cover a wide range of development activities. Each guide is specific to a type of development and articulates how higher level urban design outcomes apply in each situation. Replacing the guides with four generic outcomes, as suggested by Kāinga Ora, would remove this detailed framework for assessing the urban design aspects of resource consents. This would result in resource consent planners and urban designers needing to

⁹ [ISPP Wrap Up Hearing – Subdivision Design Guide Review Right of Reply](#), Paragraph 51.

¹⁰ [ISPP Wrap Up Hearing – Subdivision Design Guide Review Right of Reply](#), Paragraphs 74-75.

extrapolate from the generic outcomes to cover all the necessary aspects of good urban design (eg the placement of buildings on sites to maximum solar access, the creation of positive open spaces, the retention of existing trees that contribute to streetscape, the protection of privacy between dwellings, the appropriate location of waste storage, crime-prevention through environmental design (CPTED) considerations, etc). With their specificity, the guides provide a transparent, consistent and predictable assessment framework and remove the risk of different urban designers inferring different meanings under each urban design outcome.

- b. I note that the question of whether the various design guides should form a statutory part of the District Plan was addressed in Part 6 of the s42A Report prepared for Hearing Stream 2¹¹ and associated Statement of Evidence prepared by Dr Zamani¹². The ISPP Wrap Up Design Guides s42A Report¹³ also responded to submitter concerns as to issues relating to the statutory or non-statutory nature of the Guides, their relationship with District Plan provisions, their structure, and their content. The Council’s recommended approach is that Design Guides are retained as a statutory part of the PDP.

Summary of Recommendations

- 89. **HS6-DEV-Rec13:** That DEV2-P3 and DEV2-P4 be confirmed as notified.
- 90. **HS6-DEV-Rec14:** That DEV2-P1 is amended as set out below and detailed in Appendix A:

DEV2-P1 Coordinated Development

Provide flexibility for development and subdivision in the Lincolnshire Farm Development Area while ensuring that:

...

- 8. The road and access transport network provides safe and convenient access high connectivity, ~~key connections,~~ to a well-connected network, including roads, public transport links and continuous walking and cycling routes that assist in reducing carbon emissions and traffic congestion, and provides a high-quality street environment for people. The road network consists of a connected street grid, with cross-roads and short urban blocks, and avoids long cul-de-sacs as much as practicable given the topography;
- 9. A continuous road connection is provided across the Lincolnshire Farm Development Area connecting Jamaica Drive to Mark Avenue and Grenada Drive to Woodridge Drive, in general accordance with the alignment shown on the Development Area Plan and that caters for a future bus service and continuous walking and cycling networks linking Lincolnshire Farm with Woodridge and Grenada North;

- 91. **HS6-DEV-Rec15:** That references to the Subdivision Design Guide are deleted from DEV2-P2.4

¹¹ Hearing Stream 2 s42A Report - Part 6 Design Guides, section 3.2

¹² [Statement of evidence of Dr Farzad Zamani on behalf of Wellington City Council](#), Paragraph 17.

¹³ [ISPP Wrap Up Hearing – Design Guides s42A Report](#)

and DEV2.P5.1 as detailed in Appendix A.

92. **HS6-DEV-Rec16:** That submission points relating to DEV2 policies are accepted/rejected as detailed in Appendix B.

Section 32AA Evaluation

93. In my opinion, the addition of a new objective **DEV2-O5** (Access and transport connection), and associated policy clause **DEV2-P1.9** and rewording of existing clauses **DEV2-P1.8** as discussed above are more appropriate in achieving the objectives of the plan compared to the notified provisions. In particular, I consider that:

- a. The amendments give better effect to the NPS-UD directions, in particular Objectives 1 and 8, and Policy 1, by ensuring that all parts of the Lincolnshire Farm Development Area have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; that development in this area is resilient; and that it supports reductions in greenhouse gas emissions by creating continuous public transport, cycling and walking networks.
- b. The amendments will better achieve the Strategic Direction of the PDP, in particular objective **UFD-O2.3** *“Urban development in identified greenfield areas is well-connected to the public transport networks”* and **UFD-O7** *“Development supports the creation of a liveable, well-functioning urban environment that enables all people and communities to provide for their social, economic, environmental, and cultural wellbeing, and for their health and safety now and into the future. Development will achieve this by (1) being accessible and well-designed and (2) supporting sustainable travel choices, including active and micro-mobility modes.”*
- c. The amendments allow for greater consistency across the PDP as the continuous road connection linking Lincolnshire Farm, Woodridge and Grenada North was shown in the notified Development Plan.
- d. These changes are more efficient and effective than the notified provisions in achieving the objectives of the District Plan.

94. The environmental, economic, social and cultural effects of the recommended amendments, as they vary somewhat from the existing section 32 evaluation report, are below:

Environmental	As a new road connection across a large gully in the northern half of the Lincolnshire Farm Development Area was included in the notified Development Plan, the environmental effects of building this road are not considered to be greater due to the addition of a specific objective and policy clause. There will be positive environmental effects arising from the creation of connected public transport, walking and cycling routes, such as greenhouse gas emissions reductions, to a greater degree than under the notified PDP due to the clear directive for this road to cater for public transport, walking and cycling.
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Economic	As the new road was included in the notified Development Plan the cost
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of building this collector road will not differ due to the addition of a specific objective and policy clause. There will be direct costs associated with the construction of a continuous transport network in the wider Development Area including public transport, cycling and walking infrastructure and these may be higher than under the PDP as notified. There may be cost savings for public transport operators due the creation of a connected public transport route, including connection to Takapu train station.

Social	Positive social effects will arise from better accessibility for all transport modes and connectivity of the road network. These may be greater than under the notified PDP.
Cultural	There are unlikely to be any additional cultural costs or benefits compared to the notified proposal.

3.6 DEV2 Rules

3.6.1 All DEV2 rules: DEV2-R1 through to DEV2-R49

Matters Raised by Submitters

95. FENZ [273.346] seek that **DEV2-R3** (Emergency Service Facilities) in the General Industrial Activity Area is retained as notified.
96. Ministry of Education [400.155 and 400.156] seek that **DEV2-R4** (Sensitive activities not ancillary to a permitted activity) and **DEV2-R21** (Educational Facilities) in 'All Areas' are retained as notified.
97. FENZ [273.348 and 273.349] support **DEV2-R6** (Outdoor storage areas for commercial and industrial activities) in General Industrial Activity Area, with amendment to ensure screening of outdoor storage areas as a visual mitigation will not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves or other emergency response facilities. The amendment sought is as follows:

DEV2-R6 Outdoor storage areas for commercial and industrial activities

1. Activity status: **Permitted**

Where:

- a. The storage area is screened by either a fence or landscaping of 1.8m in height from any adjoining road or site.
- b. Screening does not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.

98. FENZ [273.347] seek that **DEV2-R23** (Emergency service facilities) in 'All Areas' is retained as

notified.

99. GWRC [351.319 and 351.320] support the permitted activity status for the demolition of buildings provided that building waste is properly disposed of, noting that this gives effect to Policy 34 of the operative RPS. However, they seek an amendment to **DEV2-R42** (Demolition or removal of buildings and structures) in 'All Areas' to include a rule requirement that permitted activity status is subject to building and demolition waste being disposed of at an approved facility.
100. Kāinga Ora [391.747 and 391.748] seek amendments to **DEV2-R44** (Construction, addition or alteration of residential buildings and structures including accessory buildings, but excluding multi-unit housing - Medium Density Residential Activity Area) to allow the rule to apply to all buildings not just those associated with no more than three residential units on a site, as follows:

DEV2-R44 Construction, addition or alteration of residential buildings and structures including accessory buildings ~~but excluding multi-unit housing – Medium Density Residential Area~~

1. Activity Status: **Permitted**

Where:

- a. There are no more than three residential unit on a site; and
b. Compliance is achieved with:

...

101. Kāinga Ora [391.749 and 391.750] also seek amendment to **DEV2-R44** to remove the reference to MRZ-P10 (Vegetation and landscaping) which it opposes.
102. Kāinga Ora [391.751 and 391.752] seek amendments to **DEV2-R45** (Construction of buildings, accessory buildings or structures for multi-unit housing or a retirement village, and additions or alterations to multi-unit housing or a retirement village – Medium Density Residential Activity Area) so it only applies to retirement villages (ie excludes multi-unit housing) and removes the reference to MRZ-P10.

103. Kāinga Ora [391.753 and 391.754] also seek amendment to **DEV2-R45** to preclude limited notification for developments that comply with the relevant standards. The amendments sought to **DEV2-R45** are as follows:

DEV2-R45 Construction of buildings, accessory buildings or structures for ~~multi-unit housing or a retirement village~~, and additions or alterations to ~~multi-unit housing or a retirement village~~ — ~~Medium Density Residential Activity Area~~

1. Activity status: Restricted Discretionary

Matters of discretion are:

1. The extent and effect of non-compliance with any of the follow standards as specified in the associated assessment criteria for any infringed standard:
 - i. DEV2-S6;
 - ii. DEV2-S7;
 - iii. DEV2-S8;
 - iv. DEV2-S17;
 - v. DEV2-S18;
 - vi. DEV2-S19; and
 - vii. DEV2-S20; and
2. The extent and effect of non-compliance with the requirements in Appendix 12;
- ~~3. The matters in DEV2-P1, DEV2-P2, DEV2-P5, MRZ-P6, and MRZ-P10 for multi-unit housing; and~~
4. The matters in DEV2-P5, and MRZ-P5, ~~and MRZ-P10 for a retirement village.~~

Notification status: An application for resource consent made in respect of rule DEV2-R45.1 is precluded from being publicly notified.

An application for resource consent made in respect of rule DEV2-R45.1 that complies with the relevant standards is precluded from public and limited notification.

Assessment

104. In response to FENZ [273.348 and 273.349], and consistent with my assessment in Hearing Stream 4¹⁴, I agree with that the amendment to prevent walls and structures from obscuring emergency or safety signage or obstructing access to emergency panels, hydrants, shut-off valves, or other emergency response facilities is appropriate as it will act to safeguard public and private safety in the event of a fire emergency.
105. I disagree with the amendment sought by GWRC [351.319 and 351.320] relating to the requirement for disposal of building waste at approved facilities. As I addressed in Hearing Stream 4¹⁵, it would be an impractical requirement to enforce given the difficulties of tracking waste from the many demolition projects that occur across the city. In addition, the Solid Waste Management

¹⁴ [General Industrial Zone s42 Report prepared for Hearing Stream 4](#), Paragraph 194.

¹⁵ [General Industrial Zone s42 Report prepared for Hearing Stream 4](#), Paragraph 186.

and Minimisation Bylaw 2020 deals with construction waste and all persons undertaking demolition are required to comply with this.

106. In response to Kāinga Ora [391.747 and 391.748] seeking amendments to **DEV2-R44** to allow the rule to apply to multi-unit housing and [391.751 and 391.752] seeking the exclusion of multi-unit housing from **DEV2-R45**, I disagree for the following reasons:

- a. **Standards under DEV2-R44 not suitable for multi-units:** **DEV2-R44** is intended for development up to 3 dwellings and does not include standards relevant to multi-unit developments. The standards referenced in **DEV2-R44.1** include all the equivalent 'sister' MRZ standards plus **DEV2-S7** (Height of an accessory building) and **DEV2-S15** (Permeable surface area). Managing multi-unit development under **DEV2-R44** would apply standards to these developments that are intended for smaller scale development of up to 3 dwellings. Matters of discretion would need to be added to **DEV2-R44.2** to manage issues specific to multi-unit development.
- b. **DEV2-R45 is better tailored to multi-units:** **DEV2-R45** references standards tailored for larger scale development including minimum residential unit sizes for multi-unit housing (**DEV2-S17**), reduced requirements for outdoor living space (**DEV2-S18**) and outlook space (**DEV2-S19**), and minimum density (**DEV2-S20**). **DEV2-R45** also requires larger scale development to comply with the site-specific provisions contained in Appendix 12, and requires an assessment under the Residential Design Guide (under **DEV2-P5**).
- c. **Same activity status:** The activity status for multi-unit development under **DEV2-45** is the same (Restricted Discretionary) as would be the case if Kāinga Ora's amendments were adopted.
- d. **Complex drafting:** Kāinga Ora's amendments would, in my opinion, result in more complex drafting. I note that Kāinga Ora sought similar amendments to the 'sister' MRZ rules MRZ-R13 and MRZ-R14, which Mr Patterson recommended rejecting. The only matter to note is that should DEV2 provisions be retained, I would recommend that DEV2 provisions be amended to be consistent with Mr Patterson's final recommendations, including:
 - i. Amending the title of DEV2-R44 to be more consistent with MRZ-R13 as follows:
'Construction, addition or alteration of buildings and structures where no more than three residential units occupy the site'.
 - ii. Amending the title of DEV2-R45 to be more consistent with MRZ-R14 as follows:
'Construction of buildings or structures for multi-unit housing or a retirement village'.

107. I disagree with Kāinga Ora [391.749, 391.750, 391.751, and 391.752] seeking to remove **MRZ-P10**¹⁶ (Vegetation and landscaping) as a matter of discretion from **DEV2-R44.2** and **DEV2-R45.1**. Consistent with Mr Patterson's assessment in Hearing Stream 2¹⁷, I note that **MRZ-P10** is not a 'requirement' for vegetation protection, but instead 'encourages' retention of vegetation. As such, I consider MRZ-P10 to be a reasonable matter of discretion and should be retained. I note

¹⁶ MRZ-P10: Encourage the retention of existing vegetation, particularly native vegetation and visually prominent trees that may not otherwise be protected, and where vegetation is proposed to be removed, seek new landscaping of equal or better quality to help integrate new development into the surrounding environment and minimise hard surfacing.

¹⁷ [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 362.

that this reference to MRZ-P10 would need to be updated to MRZ-P9 as per the recommended [Appendix A MRZ chapter](#).

108. I agree with Kāinga Ora [391.753 and 391.754] seeking amendment to **DEV2-R45** to preclude limited notification for developments that comply with the relevant standards as such developments are anticipated by the Plan. This amendment would make the notification status for **DEV2-R45** consistent with Mr Patterson’s recommended amendments to the ‘sister’ rule MRZ-R14 in response to a similar submission point from Kāinga Ora [391.383]¹⁸.

Consequential amendments to amend the DEV2 chapter

109. As evident from the assessment above, many of the amendments sought to DEV2 provisions can be linked back to their ‘sister’ MRZ, GIZ, or NOSZ chapter provisions. On this basis, and given my recommendation in response to Kāinga Ora [391.742] in the Future Urban Zone s42A Report to delete the FUZ, there are consequential options to consider.
110. Firstly, I consider that the notified DEV2 rules and standards are not efficient or effective for the following reasons:

The volume and duplication of DEV2 rules and standards

- a. In Appendix C to this report, I have undertaken an assessment of the DEV2 and DEV3 rules and standards. This assessment demonstrates there is considerable duplication with many DEV rules and standards being direct ‘twins’ of the ‘sister’ chapter rules and standards.
- b. There are 50 rules and 20 standards for DEV2 (and 30 rules and 20 standards for DEV3). This is a large number of rules and standards for a plan user to navigate, particularly when considering that most of these rules and standards directly duplicate the intended zone provisions – i.e. MRZ, GIZ, or NOSZ rules and standards.

No value added

- c. Since the majority of the DEV rules and standards duplicate the ‘sister’ zone provisions there is almost no value added by having those provisions duplicated in the DEV chapters.
 - d. More concerning is that there are no triggers or links in DEV rules for permitted activities to be in compliance with or a requirement to be in general accordance with the structure plans, DEV policies, Development Plans, structure plans, or requirements in APP12 or APP13. Therefore, with or without deleting the FUZ and upzoning, there is a need to ensure that development occurring in the Development Areas actually occurs in a manner consistent with structure plans, DEV policies, Development Plans, structure plans, and/or requirements in APP12 or APP13.
111. My preferred option and package of recommendations for the FUZ and Development Areas is as follows:
- a. Rezone the FUZ to its identified/intended zoning:
 - i. ‘Medium Density Residential Area’ of the FUZ be amended to Medium Density

¹⁸ [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 556.

Residential Zone

- ii. 'General Industrial Area' of the FUZ be amended to 'General Industrial Zone'
 - iii. 'Open Space' of the FUZ be amended to 'Natural Open Space Zone'
 - iv. 'No build Areas' of the FUZ be amended to 'Natural Open Space Zone'
- b. Delete the rules and standards for the Development Area 'areas' as detailed in Appendix C because those provisions will be covered by the rules and standards contained in the MRZ, GIZ, or NOSZ chapters. On the basis of my evaluation contained in Appendix C, I recommend all 'twin' DEV2 rules and standards be consequentially deleted as the upzoning/rezoning will mean that the MRZ, GIZ, or NOSZ rules and standards will directly apply. This will reduce duplication and provide a clear and concise planning framework for urban development in the Development Areas.
- c. Where there is a rule or standard that has no 'twin' i.e. addresses a matter over and above what is otherwise managed in the MRZ, GIZ, or NOSZ chapter than this should be retained within the Development Area chapter. This will ensure that the DEV2 chapter provides a more focused set of provisions to achieve the desired outcomes.
- d. Establish a new rule for the DEV2 chapter where any activity is permitted if it is: a. permitted in the underlying zone; and, b. in general accordance with the structure plan for the development areas and associated appendix (APP12); and c. complies with the DEV2 standards. Where the activity does not meet these conditions it would become restricted discretionary with matters of discretion being relevant DEV2 polices. This approach reflects what I consider to be a best practice approach (as discussed in paragraphs 83-86 of the Future Urban Zone s42A Report) for the following reasons:
- i. In my view the notified DEV2 rule framework lacks sufficient tie ins to the Development Plan and requirements of APP12 and my recommended approach rectifies this.
 - ii. By way of example, the permitted activity rule **DEV2-R19** (Commercial activities, excluding integrated retail activities) is compliant on the activity being '*Located in a building that forms part of the local centre in general accordance with the Development Plan on the Planning maps.*' This in my view underpins the purpose of the Development Area chapter in terms of ensuring development is carried out in accordance with the Development Plan. However, what is still missing is a link to the requirements of Appendix 12 – particularly **DEV2-APP-R1** which sets the parameters of what the local centre must provide, or any link to the matters in **DEV2-P6** (Local centre). As such, there is no requirement for development to actually occur in a manner that would achieve the requirements set out in Appendix 12 or **DEV2-P6**.
 - iii. The way the rules are framed in DEV2 under the heading 'Rules: Land use activities in all Areas' also raises concerns. By way of example under **DEV2-R8** (Residential activities), my reading of the rule is that so long as no more than three residential units occupy the site, this would be a permitted activity with no consideration as to be 'being in general accordance with the Development Plan' and therefore the activity could locate anywhere in Lincolnshire Farm and

not just those areas identified as 'Medium Density Residential Area'. In my view this is a drafting oversight because a. the DEV rule directly mirrors the MRZ rule; and b. it would not be appropriate for the activity to establish in the Industrial or Open Space Areas.

- iv. These concerns have informed by thinking in drafting a new DEV2 rule. Any activity permitted in the underlying zone would be permitted where the activity is in accordance with the Lincolnshire Farm Development Plan and Appendix 12, and DEV2 standards (as these address matters over and above what is otherwise addressed by provisions in the underlying zone).
- v. With respect to rules that do not have a permitted activity status i.e. **DEV2-R45** (Construction of buildings, accessory buildings or structures for multi-unit housing or a retirement village, and additions or alterations to multi-unit housing or a retirement village – Medium Density Residential Activity Area) and its 'sister' zone equivalent notified MRZ-R14, these also require consideration. These rules are restricted discretionary with 'twin' matters of discretion (see Appendix C). Relying on the currently-duplicated rules and standards in the underlying 'sister' zone chapters raises no concerns in my view about activity status' or assessment matters' (as detailed in Appendix C). In fact, the recommended approach will add value by ensuring that urban development in those areas is also considered within the context of the underlying zone policy framework. My recommended new DEV2 rule will ensure that the notified matters of discretion **DEV2-R45.1.2** and **DEV2-R45.1.3** which reference Appendix 12 and relevant DEV2 policies apply to activities that trigger the new rule.
- vi. Where an activity is not in accordance with the Lincolnshire Farm Development Plan and Appendix 12, I have introduced a new discretionary activity rule (recommended DEV2-R1.3). In my view this closes the gap and ensures that development occurs in a manner consistent with the Development Plan and Appendices, and helps to achieve the objectives of the Development Area chapters, which ultimately underpin the purpose of the Development Areas.

112. The above sets out my recommendation and detailed reasoning for my preferred option. However, if the panel were of mind to retain the FUZ, I have considered alternative options as follows:

- a. If the FUZ is to be retained, I recommend that DEV2 rules and standards be amended to be consistent with their 'twin' MRZ, GIZ, or NOSZ rules and standards. This will ensure consistent planning outcomes, especially given the intent is that the DEV2 'areas' are be developed in alignment with the relevant 'sister' zones and eventually rezoned.
- b. While this is efficient and effective in terms of consistency, there would remain a large amount of duplication between DEV2 rules and standards and the 'sister' zones. Nevertheless, I consider there is a need for the DEV provisions to be consequentially amended to reflect the recommended amendments made to the relevant 'sister' zone provisions.

- c. The issue arising here however, is that decisions on the MRZ and GIZ are not yet known, and for the NOSZ – the hearing has not commenced. Therefore, it is difficult to make consistent amendments as part of this hearing stream. I propose that necessary amendments could be recommended as part of the HS6 Right of Reply at which point decisions on the MRZ and GIZ chapters may be known. I note that the NOSZ chapter is to be heard in Hearing Stream 7, and as such, any consequential amendments applicable to DEV2 and DEV3 would need to be made following decisions on that chapter.
113. With or without deleting the FUZ and upzoning, if the panel were of mind to retain the duplicated ‘twin’ rules and standards within the DEV2 chapter then the matter of timing to make any applicable consequential amendments to the DEV2 chapters will need to be considered following the release of decisions on the ISPP and Hearing Stream 7.
114. If the panel were of mind to accept my recommendation to delete the FUZ and all ‘twin’ DEV2 rules then this timing matter will not be an issue because the relevant provisions would already be addressed in the ‘sister’ chapter and no longer duplicated in DEV2.

Summary and Section 32AA

115. In alignment and continuation of my recommendation to delete the FUZ in its entirety and upzone Lincolnshire Farm to the intended zoning, I consequentially recommend deletion of the DEV2 rules identified in Appendix C.
116. As set out in Appendix C, these DEV2 rules are a direct ‘twin’ of the relevant ‘sister’ zone rules. Therefore, I am of the view that these DEV2 rules add no additional value beyond what is otherwise addressed by the GIZ, MRZ, or NOSZ rules.
- a. Upon upzoning the ‘General Industrial Activity Area’ to GIZ - DEV2-R1, DEV2-R2, DEV2-R3, DEV2-R4, DEV2-R5, DEV2-R6, and DEV2-R7 will be superseded by GIZ rules as demonstrated in Appendix C.
 - b. Upon upzoning the ‘Medium Density Residential Area’ to MRZ - DEV2-S6, DEV2-S7, DEV2-S8, DEV2-S9, DEV2-S10, DEV2-S11, DEV2-S12, DEV2-S13, DEV2-S14, DEV2-S15, DEV2-S16, DEV2-S17, DEV2-S18, DEV2-S19, and DEV2-S20 will be superseded by MRZ rules as demonstrated in Appendix C.
 - c. Upon upzoning the ‘Natural Open Space Activity Area’ to NOSZ - DEV2-R32, DEV2-R33, DEV2-R34, DEV2-R35, DEV2-R36, DEV2-R37, DEV2-R38, DEV2-R39, and DEV2-R40 will be superseded by NOSZ rules as demonstrated in Appendix C.
117. While I recommend deletion of these notified DEV2 rules, I recommend the DEV2 rules without equivalent provisions in the ‘sister’ zones be retained as notified.
118. In my opinion, based on the above analysis and assessment, the recommendation to delete the Future Urban Zone and make amendments to upzone the Development Areas is the most appropriate way to achieve the PDP strategic directions, and higher order documents.
119. The environmental, economic, social and cultural effects of the recommendation to delete ‘twin’ Development Area provisions is set out below.

Costs	Benefits	Risk of Acting/Not acting
<p>Environmental and Economic</p> <p>There are limited new environmental or economic costs arising from the deletion of ‘twin’ provisions as upzoning/rezoning of the FUZ will mean that the equivalent ‘twin’ GIZ, MRZ or NOSZ provisions will become applicable.</p> <p>As assessed in Appendix C, the majority of the Development Area ‘Area’ provisions directly mirror the ‘sister’ zone provisions. Therefore, deletion of the identified DEV provisions makes no material difference to the rule framework because the same rule exists regardless, albeit in a different chapter. There is no change to activity status, except as identified in Appendix C.</p> <p>Social and Cultural</p> <p>There are unlikely to be any social and cultural costs.</p>	<p>Environmental</p> <p>A benefit arising from the deletion of the FUZ and DEV ‘twin’ provisions and instead reliance on the GIZ, MRZ or NOSZ provisions is that policies of the MRZ, GIZ, and NOSZ will become a relevant consideration. By way of example, if an activity were proposed within the ‘General Industrial Activity Area’ of DEV2, upon deleting the DEV2 rules and standards and instead relying on the GIZ chapter, the activity can be considered and assessed in accordance with the full GIZ policy and rule framework. The benefit being that there would be clear policy direction for industrial, residential, and open space activities in addition to the policy direction of the Development Area chapters.</p> <p>Economic</p> <p>An economic benefit is a significant reduction of duplication between the rules and standards of the Development Areas and the intended zone chapters. There will be benefit for plan users in having a clear and concise planning framework for urban development in the Development Areas with reliance on the activity and building rules in the zone chapters.</p> <p>Social and Cultural</p> <p>The proposed change will result in greater certainty for the community in terms of intended development of the Development Areas.</p>	<p>The benefit of acting now is that comprehensively planned urban development can proceed in a manner consistent with the intended zoning. This will create a well-functioning urban environment that delivers compact urban form and ensures sufficient land is available for housing and business purposes in accordance with the NPS-UD.</p> <p>I do not consider that there are any natural justice issues in making this recommendation because:</p> <ol style="list-style-type: none"> a. Irrespective of whether the ‘twin’ DEV rules and standards are deleted and superseded by the equivalent ‘sister’ zone provisions, the DEV2 rules and standards would be amended to be consistent with recommended amendments to their ‘twin’ GIZ, MRZ, or NOSZ provision. By way of example, if the ‘twin’ DEV provisions were to be retained in the DEV chapter DEV2-R6 would still need to be amended in accordance with recommended amendments to the ‘twin’ rule GIZ-R12. b. While I reject the submission points of submitters who sought that DEV provisions be retained as notified, in actual fact I accept their submissions in part because the ‘sister’ zone rule is directly applicable and therefore in a sense the relief sought to be retained as notified, I agree with.
<p>Overall Evaluation of Effectiveness and Efficiency</p>	<p>The recommendation continues to address the same matters as the notified Development Area rules and standards, albeit in different chapters that reduces duplication across the PDP.</p> <p>Given the above reasons, the recommendations are more efficient and effective at achieving the purpose of the Act and achieving the strategic objectives of the PDP than retaining the notified DEV rules and standards.</p>	

Summary of Recommendations

120. **HS6-DEV-Rec17:** That **DEV2** rules be deleted and DEV2 rules be retained as detailed in Appendix A and the associated assessment contained in Appendix C.
121. **HS6-DEV-Rec18:** That submission points relating to DEV2 rules are accepted/rejected as detailed in Appendix B.
122. **Alternative recommendation:** If the Panel were of mind to retain the FUZ, I recommend that the DEV2 rules be amended in a manner consistent with their ‘twin’ provisions. This would need to occur following receipt of decisions on the ISPP and Hearing Stream 7.

3.7 DEV2 Standards

3.7.1 All DEV2 standards: DEV2-S1 through to DEV2-S24

Matters Raised by Submitters

123. FENZ seeks amendments to exclude “*emergency service facilities up to 9m in height and hose drying towers up to 15m in height*” from the following standards:
 - a. [273.350 and 273.351] **DEV2-S1** (Maximum height - General Industrial Activity Area)
 - b. [273.352 and 273.353] **DEV2-S2** (Height in relation to boundary - General Industrial Activity Area)
 - c. [273.354 and 273.355] **DEV2-S6** (Building height - Medium Density Residential Area)
 - d. [273.356 and 273.357] **DEV2-S8** (Height in relation to boundary - Medium Density Residential Area)
124. Rod Halliday [25.38] (opposed by Glenside Progressive Association [FS4.8]) seeks amendments to **DEV2-S15** (Permeable surface area - Medium Density Residential Area) to reduce the minimum permeable surface from 30% to 20% of the net site area. Mr Halliday considers that 30% permeable surface is too high given the MDRZ allows for 50% site coverage and **DEV2-S14** (Landscaped area – Medium Density Residential Area) requires 20% of the site to be soft landscape.
125. Rod Halliday [25.39 and 25.40] seeks that **DEV2-S16.2.b** (Fences and standalone walls - Medium Density Residential Area) be amended to allow fences to be 1.5m before the 50% visually transparent requirement applies. In addition, the submitter seeks that retaining walls are excluded from the standard.
126. Rod Halliday [25.41, 25.42, and 25.43] seeks that **DEV2-S18** (Outdoor living space for multi-unit housing) is amended to add a clarification note relating to communal open space minimum area and dimensions. As it stands, the submitter interprets the standard as follows: that the minimum area of 10m² is cumulative, but that the minimum dimensions remain 8m.
127. Rod Halliday [25.44 and 25.45] (opposed by Glenside Progressive Association [FS4.9]) seeks clarifications to **DEV2-S20** (Minimum density) to specify that new roads, reserve areas, right of ways or easement areas (drainage, etc), hazard areas on a site (ponding/flood), SNAs or sites of

significance are excluded when calculating density.

Assessment

128. In alignment and continuation of my recommendation in response to Kāinga Ora [391.742]¹⁹ to delete the FUZ in its entirety and upzone Lincolnshire Farm to the intended zoning, I consequentially recommend deletion of the DEV2 standards identified in Appendix C.
129. As set out in Appendix C, these DEV2 standards are a direct ‘twin’ of the relevant ‘sister’ zone standards. Therefore, I am of the view that these DEV2 standards add no additional value beyond what is otherwise addressed by the GIZ, MRZ, and NOSZ standards.
 - a. Upon upzoning the ‘General Industrial Activity Area’ to GIZ - DEV2-S1, DEV2-S2, DEV2-S3, DEV2-S4, and DEV2-S5 will be superseded by GIZ standards as demonstrated in Appendix C. As a consequential amendment, I recommend that Lincolnshire Farm be added to GIZ-S1. This amendment ensures that the **DEV2-S1** maximum height for the ‘General Industrial Activity Area’ is retained.
 - b. Upon upzoning the ‘Medium Density Residential Area’ to MRZ - DEV2-S6, DEV2-S7, DEV2-S8, DEV2-S9, DEV2-S10, DEV2-S11, DEV2-S12, DEV2-S13, DEV2-S14, DEV2-S15, DEV2-S16, DEV2-S17, DEV2-S18, DEV2-S19, and DEV2-S20 will be superseded by MRZ standards as demonstrated in Appendix C.
 - c. Upon upzoning the ‘Natural Open Space Activity Area’ to NOSZ - DEV2-S21, DEV2-S22, DEV2-S23, and DEV2-S14 will be superseded by NOSZ standards as demonstrated in Appendix C.
130. While I recommend deletion of these notified DEV2 standards, I recommend the DEV2 standards without equivalent provisions in the ‘sister’ zones be retained as notified.
131. For completeness, and if the panel were of mind to retain the FUZ, I have assessed all submission points on DEV2 standards below.
132. In response to FENZ [273.350 and 273.351] seeking amendments to **DEV2-S1** (Maximum height - General Industrial Activity Area), I firstly note that emergency service facilities up to 9m would be within the permitted maximum height limit which allows for buildings and structure up to 12m. As such there is no basis for an exemption for emergency service facilities.
133. As to the height exemption sought for hose drying towers up to 15m, consistent with my assessment²⁰ in response similar submission points from FENZ [273.333 and 273.334] on the ‘sister’ standard GIZ-S1, I consider that potential adverse effects associated with any over height structures within this area would be appropriately considered through a consenting process. As the need for new hose drying towers will arise infrequently, I am of the opinion that any associated cost or delay to FENZ in applying for resource consent would be relatively insignificant overall. Where the maximum height of **DEV2-S1** is infringed, I consider that the assessment criteria identify suitable considerations to assess an over-height tower, including whether there is a functional need or operational need.

¹⁹ See Hearing Stream 6 Future Urban Zone s42A Report

²⁰ [General Industrial Zone s42 Report prepared for Hearing Stream 4](#), Paragraph 211.

134. Similarly, and consistent with my assessment²¹ in Hearing Stream 4 for the ‘sister’ standard GIZ-S3, I disagree with FENZ [273.352 and 273.353] seeking amendments to **DEV2-S2** (Height in relation to boundary - General Industrial Activity Area). I note that there is scope for hose drying towers to be located to comply with the standard, or alternatively considered through a consenting process where any noncompliance arises. I do not anticipate that the need for new hose drying towers would arise frequently so would not result in a significant cost or delay to FENZ.
135. For the same reasons, I disagree with FENZ [273.354, 273.355, 273.356, and 273.357] seeking amendments to **DEV2-S6** (Building height - Medium Density Residential Area) and **DEV2-S8** (Height in relation to boundary - Medium Density Residential Area) to provide for the same exemptions. I refer to the assessment of Mr Patterson in Hearing Stream 2²² where his assessment on similar submission points from FENZ on the ‘sister’ standards MRZ-S1 and MRZ-S3 came to the same conclusion - that the effects of an over-height tower are most appropriately considered through a resource consent process and, therefore, an exclusion is not warranted.
136. In response to Rod Halliday [25.38] seeking amendments to **DEV2-S15** (Permeable surface area - Medium Density Residential Area), I note that Mr Halliday made a similar submission point on the ‘sister’ MRZ standard MRZ-S10 [25.31]. In Hearing Stream 2, Mr Patterson recommended²³ that MRZ-S10 be deleted and relocated to the Three Water chapter as the more appropriate location for matters on permeable surfaces – to align with the approach under the National Planning Standards. I concur with Mr Patterson’s recommendation, and consider that **DEV2-S15** should be deleted.
137. In response to Rod Halliday [25.39 and 25.40] seeking amendment to **DEV2-S16** (Fences and standalone walls - Medium Density Residential Area), I note that Mr Halliday made similar submission points on the ‘sister’ MRZ standard MRZ-S11 [25.32 and 25.33]. I again refer to the assessment of Mr Patterson in Hearing Stream 2²⁴ where he referred to advice from the Council's urban design expert, Mr Zamani²⁵, which indicated that increasing the height of fences to 1.5m and requiring visual transparency to 2m would have an impact on CPTED/safety and result in a lack of connection between private and public space. I accept Mr Zamani's evidence on this matter. On this basis I reach the same conclusion of Mr Patterson and disagree with Mr Halliday’s relief sought.
138. As to Mr Halliday’s relief that retaining walls be excluded from **DEV2-S16**, I disagree there is a need to clarify that retaining walls are excluded from the standard. While not defined in the PDP, I consider that ‘stand-alone walls’ would not include ‘retaining walls’. I note that Mr Patterson did not recommend any amendment to the ‘sister’ standard MRZ-S11 in response to this submission point.
139. In response to Rod Halliday [25.41, 25.42, and 25.43] in relation to clarification on **DEV2-S18** (Outdoor living space for multi-unit housing), I note that Mr Halliday made a similar submission

²¹ [General Industrial Zone s42 Report prepared for Hearing Stream 4](#), Paragraph 230.

²² [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 652 and 715.

²³ [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 831-836.

²⁴ [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 844.

²⁵ Statement of evidence of Dr Farzad Zamani on behalf of Wellington City Council (Urban Design), 1 March 2023, Paragraph 38

point [25.34] on 'sister' standard MRZ-S13. I concur with the assessment of Mr Patterson in Hearing Stream 2²⁶ in response to this submission point, including advice from Council's urban design expert, Mr Zamani²⁷, that the minimum area of communal outdoor living space be increased to 64m² for 4-15 units and that each additional unit above 15 units adds 2m² to the minimum requirement. On this basis, I agree in part with Mr Halliday and recommend that **DEV2-S18** be amended to be consistent with the recommended amendments to MRZ-S13.

140. I disagree with Rod Halliday [25.44 and 25.45] seeking clarifications to **DEV2-S20** (Minimum density) for the following reasons:

a. The definition of 'Minimum density' in the PDP is as follows:

means the number of lots or household units per hectare (whichever is the greater). The area (ha) includes land for:

a. residential activities, including all open space and on-site parking associated with residential development;

The area (ha) excludes land that is:

b. public road corridors

c. public open space areas

b. The definition as notified already excludes new roads and public open space areas, and therefore no amendment is necessary.

c. In relation to the exclusion of hazard areas on a site (ponding/flood), SNAs, or sites of significance, these have generally been identified as open spaces in the Lincolnshire Farm Development Area as areas not being appropriate for residential activities, and therefore not applicable in the density calculation given the exclusion already provided for by way of the definition of 'Minimum density'.

d. There remains the issue of physical constraints or easements which could limit residential development and, therefore, densities. The plan anticipates such situations in the assessment criteria. Where the standard is infringed, I consider the assessment criteria of **DEV2-S20** provides appropriate consideration of these matters:

1. Whether there are physical or infrastructural constraints restricting compliance; and

2. Whether allotments contain undevelopable land (for example structural embankments or streams).

141. As such, I consider that the definition of 'Minimum density' and the **DEV2-S20** assessment criteria suitably address the matters of concern raised by Mr Halliday.

142. As evident throughout this report, I consider it important that the DEV2 standards, should they be retained, be consequentially amended to reflect the recommended amendments made to the GIZ and MRZ standards. This will ensure consistent planning outcomes, especially given the intent

²⁶ [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 868-872.

²⁷ Statement of evidence of Dr Farzad Zamani on behalf of Wellington City Council (Urban Design), 1 March 2023, Paragraph 35

that the DEV2 ‘areas’ are to be developed in accordance with the relevant ‘sister’ zone and eventually rezoned. I note that the NOSZ standards are to be heard in Hearing Stream 7, and any consequential amendments applicable to DEV2 should be made accordingly.

143. I draw on Mr Patterson’s recommendations for the MRZ standards and my own recommendations for the GIZ standards. By way of example, FENZ [273.189] made a submission point on MRZ-S11 seeking amendment to ensure walls and structures do not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities. In Hearing Stream 2, Mr Patterson recommended²⁸ accepting this submission point to ensure the safety of the public. Given that MRZ-S11 is the ‘sister’ standard of **DEV2-S16**, I suggest that **DEV2-S16** be consequentially updated to be consistent. While there were no submissions seeking this amendment to **DEV2-S16**, I consider that all DEV2 standards should be amended to be consistent with recommendations made to applicable ‘sister’ standards.

Summary of Recommendations

144. **HS6-DEV-Rec19:** That **DEV2** standards be deleted and DEV2 standards be retained as detailed in Appendix A and the associated assessment contained in Appendix C.
145. **HS6-DEV-Rec20:** That submission points relating to DEV2 standards are accepted/rejected as detailed in Appendix B.
146. **Alternative recommendation:** If the Panel were of mind to retain the FUZ, I recommend that the DEV2 standards be amended in a manner consistent with their ‘twin’ provisions. This would need to occur following receipt of decisions on the ISPP and Hearing Stream 7.

3.8 APP12 – Lincolnshire Farm Development Area

Matters Raised by Submitters

147. Claire Nolan et al [275.46] seek that Appendix 12 is retained as notified.
148. Transpower [315.195] support reference to ‘*integration of land underneath transmission lines into the open space network so it can be used by the public for recreation purposes*’ in **DEV2-APP-R4.b** and seek this be retained as notified.
149. WCC [266.173] seek amendments to **DEV2-APP-R4.i** (Open spaces) to provide better cross reference between the Development Plan maps and appendices, as follows:

The neighbourhood parks ~~required by DEV2-APP-R4.c to DEV2-APP-R4.e~~ must be constructed and accessible for public use at the time the 100th dwelling within the relevant neighbourhood park catchment area, shown on the Development Plan maps as catchment areas A to J, is constructed.

150. Rod Halliday [25.4] seeks notes be added to Appendix 12 to re-iterate that “The location of the map lines indicating boundaries between activity areas or location of roads and special features are not intended to be immovable”, as per the introduction in **DEV2**.

²⁸ [Part 3 \(Medium Density Residential Zone\) s42A Report prepared for Hearing Stream 2](#), Paragraph 845.

151. Rod Halliday [25.49 and 25.50] (opposed by the Ministry of Education [FS52.1]) supports the provision of a new school of 3ha in **DEV2-APP-R2** (School site) but seeks an amendment stipulating that this land must be purchased by the Ministry of Education.
152. Rod Halliday [25.51] considers that the requirement for the land provided for the new school in **DEV2-APP-R2** (School site) to be flat, as far as practicable, will be difficult and expensive and seeks an amendment so the land for the new school may be handed over in its original form and allow the Ministry of Education to obtain earthworks consents as a requiring authority.
153. Rod Halliday [25.52 and 25.53] supports the provision of a community facility in **DEV2-APP-R3** (Community facilities) but seeks to remove the requirement for the land to be flat, as far as practicable; and an amendment stipulating that this land must be purchased by Wellington City Council.
154. Rod Halliday [25.54 and 25.55] supports the provision of a new community park of between 4-6ha in **DEV2-APP-R4** (Open spaces) but seeks to remove the requirement for a minimum 3 ha of this land to be flat field space. Rod Halliday [25.56] also seeks to clarify that land for the new community park will be formalised through a Reserves Agreement.

Assessment

155. In response to Rod Halliday [25.4] seeking a note be added to Appendix 12 to emphasise the concept of flexibility, I agree with the intent but do not consider any amendment is necessary. I refer to my parallel assessment in section 3.3.3 where I respond to a similar submission point of Mr Halliday.
156. I disagree with Rod Halliday [25.49 and 25.50] seeking an amendment to **DEV2-APP-R2** (School site) that land for the school must be purchased by the Ministry of Education. Instead, I agree with the Ministry of Education's further submission [FS52.1] that: *'the purchase of land is not a District Plan matter as it requires an open and unfettered negotiation between the vendor and the purchaser in accordance with the requirements of the Public Works Act and Ministry guidelines. By requiring the purchase of the land as a District Plan matter the negotiations for the land would be constrained. For example, there may be alternatives to outright purchase that could be explored in those negotiations such as the Ministry acquiring a leasehold interest in the land.'*
157. In response to Rod Halliday [25.51] seeking an amendment to **DEV2-APP-R2** to remove the requirement for the school site to be flat, as far as practicable, I agree for the following reasons:
 - a. I accept that school sites in the northern suburbs of Wellington are seldom completely flat and that the requirements of the NPS-FM and other legislation constrain bulk earthworks.
 - b. However, the best opportunity to recontour the school site will be when bulk earthworks are undertaken to form the roads and adjoining development areas as cut and fill can be balanced on site over a wider area at that stage. Leaving the earthworks on the school site to be undertaken at a later stage and in isolation from the wider area will likely result in the need to move fill to or from the site, resulting in inefficiencies and compromised design outcomes.
 - c. I recommend that the wording of **DEV2-APP-R2.a** be amended to accept that the school site can comprise a number of relatively levelled platforms rather than require it to be one

single levelled platform.

158. In response to Rod Halliday [25.52 and 25.53] seeking amendments to **DEV2-APP-R3** (Community facilities), I disagree for the following reasons:

- a. A requirement for Wellington City Council to purchase the community facilities site is not supported for the same reason the requirement for Ministry of Education to purchase the school site is not supported. The land for community facilities could be vested with the Council as part of a Development Agreement or Reserve Agreement or could be purchased by the Council. These are not matters for the District Plan.
- b. The community facilities site is only 0.3ha in area (circa 55m X 55m if square in shape) so more readily capable of being recontoured to be 'flat, as far as practicable' than the 3ha school site. It is also more efficient to recontour the site as part of the bulk earthworks than at a later stage. I consider that the words 'flat, as far as practicable' in **DEV2-APP-R3** provide adequate flexibility for the resource consent planner to accept a community facility site that is not completely flat.

159. In response to Rod Halliday [25.54 and 25.55] seeking amendments to **DEV-APP-R4.g** (Open spaces) to remove the requirement for a minimum 3 ha of the 4 to 6 ha Community Sports and Active Recreation Reserve to be flat field space, I agree in part for the following reasons:

- a. I accept the submitter's view that creating a 3 ha flat field space in the Lincolnshire Farm topography may be a challenge and that the requirements of the NPS-FM and other legislation constrain bulk earthworks. However, as stated above, the best opportunity to recontour this reserve will be when bulk earthworks are undertaken to form the roads and adjoining development areas as cut and fill can be balanced on site over a wider area.
- b. I recommend that the wording of **DEV2-APP-R4.g.i** be amended to accept that the 3 ha area of field space can comprising one or more levelled platforms that enable a range of sports fields and surfaces.

160. In response to Rod Halliday [25.56], I consider that the land for Community Sports and Active Recreation Reserve could be vested with the Council as part of a Development Agreement or Reserve Agreement or could be purchased by the Council, however these are not matters for the District Plan.

Summary of Recommendations

161. **HS6-DEV-Rec21:** That **DEV2-APP-R2.1a** (School site) be amended as set out below and detailed in Appendix A:

1. A school site is provided in accordance with the following:

- a. A site ~~that is flat, as far as practicable,~~ of approximately 3 ha ~~that is flat, as far as practicable,~~ comprising one or more relatively levelled platforms capable of accommodating school buildings must be set aside for the purpose of a school;

162. **HS6-DEV-Rec22:** That **DEV2-APP-R4.g.i** (Open spaces) be amended as set out below and detailed in Appendix A:

g. One Community Sports and Active Recreation Reserve of between 4 to 6 ha must be provided in the approximate location on the Development Plan and must include:

i. Minimum 3ha, comprising one or more levelled platforms of flat field space that enables a range of sports fields and surfaces to complement provision at Grenada North and Alex Moore Park;

163. **HS6-DEV-Rec23:** That **DEV2-APP-R4.i** (Open spaces) be amended as set out below and detailed in Appendix A:

The neighbourhood parks ~~required by DEV2-APP-R4.c to DEV2-APP-R4.e~~ must be constructed and accessible for public use at the time the 100th dwelling within the relevant neighbourhood park catchment area, shown on the Development Plan maps as catchment areas A to J, is constructed.

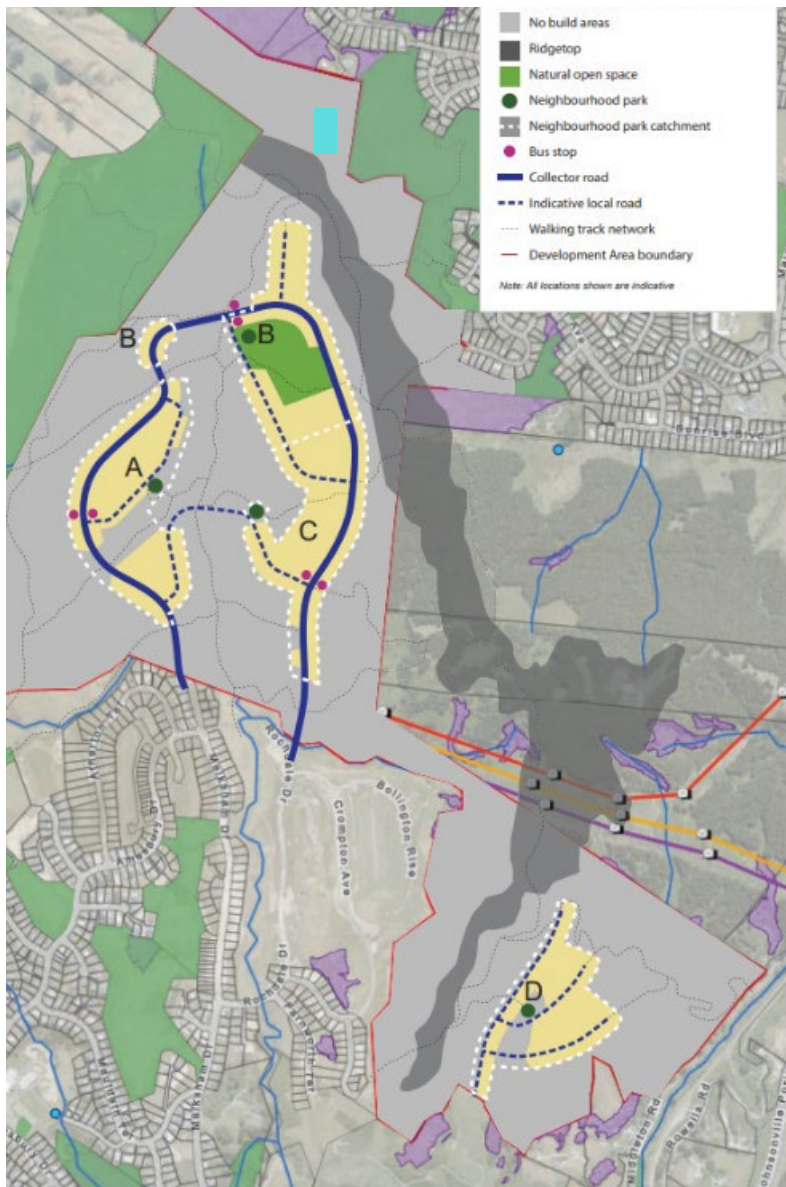
164. **HS6-DEV-Rec24:** That submission points relating to APP12 are accepted/rejected as detailed in Appendix B.

3.9 General Points on DEV3

3.9.1 DEV3 Mapping

Matters Raised by Submitters

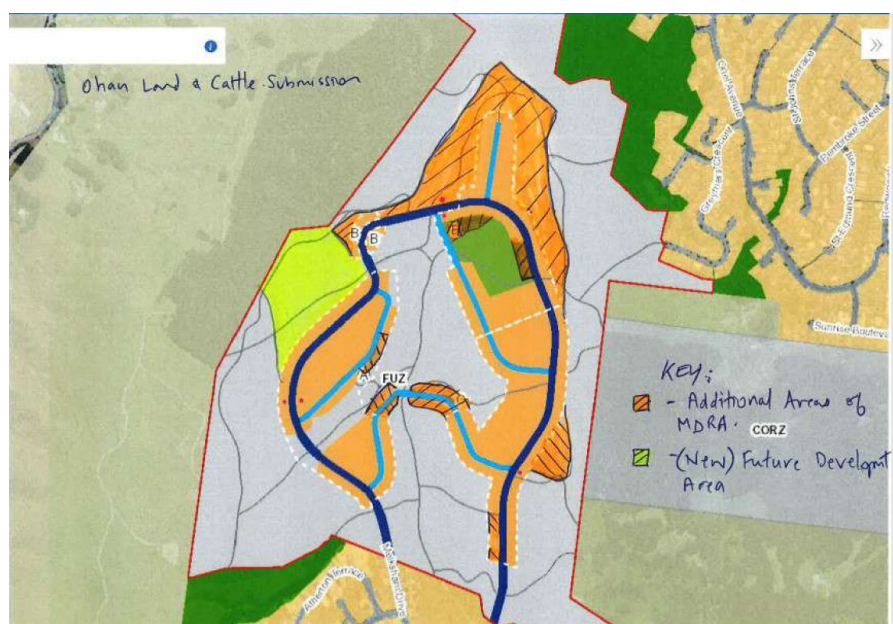
165. WCC [266.40] considers that the absence of the Ridgetop area in the PDP maps is an error and requests that the Ridgetop area be added to the Development Plan, as shown below, with an associated amendment made to the PDP map legend.



166. WCC [266] seeks changes to the Development Plan maps and legends for the purposes of clarification, and better cross-referencing and linkage to the related District Plan appendices, as follows. These points are opposed by Panorama Property Limited [FS11.34, FS11.35, FS11.36, FS11.37, FS11.38].

- a. [266.40] amend the Development Plan legend to add a letter reference that matches the letters shown on the maps i.e. A – D. The legend should state these letters relate to: ‘neighbourhood park catchment’.
- b. [266.41] amend the Development Plan legend from ‘Neighbourhood park’ to ‘Neighbourhood park (approx. location)’ for the purposes of clarification;
- c. [266.42] amend the Development Plan legend from ‘unbuilt area’ to ‘No Build Area’; and deletion of the parentheses that follows: (open space, cut and fill batters);
- d. [266.43] amend the Development Plan so the letters A – D are moved to be generally in the centre of the white dashed catchment areas.

- e. [266.44] amend the Development Plan for Upper Stebbings so the small catchment area currently with two “B” has one “B”.
167. In reviewing the submission of Rod Halliday I note that he has sought amendments to the Development Plan. These points in his original submission were not specifically identified as submission points in the summary of submissions, but for completeness I assess them here, using Mr Halliday’s own submission reference numbers:
- a. Under point 108.11 Mr Halliday seeks that land shown as No Build Area in Glenside West be amended to 1) reflect the areas to be vested as reserve under SR448621 and identified as Reserve Area 6 of the Reserves Agreement between the developer and Council and 2) reduce the extent of No Build Area as he considers that this land is suitable for *“some rural lifestyle dwellings in non-obtrusive locations”*. The relief sought in relation to the first point is to *“either rezone the approved reserve area to Natural Open Space and keep it within the Development Area or remove it and rezone it Open Space”*. The relief sought in relation to the second point is to identify the remainder/part of the Glenside West Development Area (outside the area identified for Medium Density Residential activity) as Large Lot Residential.
 - b. Under point 108.12 Mr Halliday supports the development plan for the Upper Stebbings area, noting there is general alignment with the plan worked on between WCC, the landowner and stakeholders. However, he considers that there are additional areas of land in Upper Stebbings that are suitable for development around the periphery of the Medium Density Residential areas. These are currently identified as No Build Areas in the Development Plan. Part of his rationale for this amendment is that the RM (Enabling Housing Supply and other Matters) Amendment Act 2021 requires additional housing capacity and it would be *“wasteful to identify parts of this land as No Build Areas”*. The relief sought in relation to this point is to amend the Development Plan to 1) identify additional areas of land suitable for Medium Density Residential activity and 2) identify a Future Urban Area that would provide for a connection point into Ohariu Valley in the future. The proposed amendments are shown below:



- c. Under point 108.13 Mr Halliday supports the creation of the Glenside West Development area but opposes the proposed form of development in Glenside West shown in the Development Plan. He considers that the current development plan does not reflect the logical and viable development pattern for the land based on its topography, and that streams have been incorrectly mapped. Mr Halliday also states that suitable dwelling sites have been identified by the developer outside the Medium Density Residential area (i.e. within the No Build Area). Mr Halliday's proposed amendments to the Development Plan also map where the agreed and future reserves are situated along with walking tracks, of which some are based on existing farm tracks. The relief sought is to 1) amend the Development Plan to reflect the submitter's marked up plan, 2) remove and review all indicative walking tracks to reflect the developer's plan, and 3) introduce Large Lot Residential zoning across part of the land, as per the developer's plan. The proposed amendments are shown below:



168. In reviewing the submission of Rod Halliday I note that he seeks to have an area of high grounds in Glenside West (including part of the Ridgetop area) identified as Open Space since this land is to be vested as reserve under the Reserves Agreement associated with SR448621. This point in his original submission (referenced 108.11 in the submission) was not specifically identified as a submission point in the WCC summary of submissions, but for completeness I have assessed this matter. The land to be vested as reserve is identified below.



Assessment

169. I agree with WCC [266.40, 266.41, 266.42, 266.43, and 266.44] as these minor amendments will make the PDP clearer.

Upper Stebbings

170. I agree with WCC [266.40] that the absence of the Ridgetop area in the PDP maps was an error. The absence of the mapped Ridgetop area is apparent in **DEV3-R33** (Construction of buildings and structures in the Ridgetop) which makes construction in the Ridgetop area a non-complying activity. This provision relies on the Ridgetop area being identified in the maps. The Ridgetop area also provides clarity for **DEV3-P4.6** *“Protects the natural ridgetop around the Upper Stebbings valley to provide a natural backdrop to Upper Stebbings and Tawa valleys and a connected reserves network.”*

171. I disagree with Mr Halliday [point 108.12 using the reference number in his submission] that some

of the land identified as No Build Area in Upper Stebbings should be converted to Medium Density Residential or Large Lot Residential. My reasons are:

- a. The Council's masterplanning process²⁹ for both areas under **DEV3** has been informed by earthworks modelling which demonstrated a balance of cut and fill³⁰; infrastructure assessments which confirmed the serviceability and viability of the development; ecological and hydrological advice including surveys of the streams to ascertain whether they were ephemeral or not and an assessment of the length of stream loss under various layout options³¹; as well as transport³², cultural³³, heritage³⁴ and landscape³⁵ reports. The resultant Development Plan takes into consideration the presence of streams, native bush, steep topography, areas of visual sensitivity, existing infrastructure, road geometry such as maximum gradient and radii, flooding issues, etc. The masterplanning process balanced the need to enable housing and to keep adverse effects on the environment to the minimum practicable.
- b. The draft Development Plan³⁶ was the subject of community engagement³⁷ and feedback³⁸ from the community helped inform the final Development Plan contained in the PDP. Changing the Development Plan as sought would deny the community the opportunity to have a say and would negate the feedback previously provided.
- c. The submitter and landowner were engaged with during the preparation of the Development Plan and several changes were made to take into consideration their views.
- d. Extending the Build Area as suggested would mean the footprint of development in terms of earthworks, vegetation removal and visual effects would be much larger than for the notified Development Plan. It would also mean more impacts on streams, SNAs, and the Ridgetop area.

172. In Upper Stebbings, the additional areas proposed for Medium Density Residential activity by the submitter were excluded in the Development Plan due to the impact of associated earthworks (in No Build Area) on nearby streams, SNAs or other features. The proximity of earthworks to the Ridgetop and Special Amenity Landscape (along the north-western boundary of the Development Area) also informed the extent of the Built Area in the Development Plan. Some conflicts between proposed development areas and streams or SNAs are circled in the image below:

²⁹ Stebbings Structure Plan - Upper Stebbings Concept Masterplan – Design Process and Thinking, Isthmus, February 2020 and Upper Stebbings and Glenside West – Glenside West Concept Masterplan – Design Process and Thinking, Isthmus, November 2020

³⁰ [Development Scheme Comparison of Common Metrics](#), Orogen, 12 April 2021.

³¹ See Orogen Option 5 – Streams extents (Existing, lost and piping), [W21005-OR5-SK701](#)

³² Upper Stebbings and Glenside West Development Concept Transport Assessment, Tonkin + Taylor, October 2020

³³ Cultural Values Report – Upper Stebbings Valley and Marshall Ridge Structure Planning, Raukura Consultants, May 2018.

³⁴ Historic Heritage Study for the Upper Stebbings and Marshall Ridge Structure Plan, Elizabeth Cox (Bay Heritage Consultants), April 2018

³⁵ Upper Stebbings Valley Landscape and Ecology Analysis, Boffa Miskell, July 2018

³⁶ Upper Stebbings and Glenside West Development Concept, Wellington City Council, November 2020

³⁷ <https://wellington.govt.nz/your-council/projects/proposed-upper-stebbing-valley-community>

³⁸ Upper Stebbings and Glenside West Engagement Summary, Wellington City Council, November 2020



Figure 2: Upper Stebbings – Areas of conflict between additional residential areas and streams or SNAs

173. The original yield of this Development Area was calculated based on lower densities than those enabled under the RM (Enabling Housing Supply and other Matters) Amendment Act 2021 and associated Medium Density Residential Standards (MDRS). This means that the potential yield of the Build Area within the Development Area has increased and consequentially, the capacity of wastewater and potable water infrastructure needs to be planned accordingly. It does not mean that additional land areas are required to achieve an increased development yield, as argued by the submitter.
174. Development in Ohariu Valley was considered in the precursor work to the Spatial Plan 2021 alongside other potential additional greenfield growth areas such as Takapu Valley. These options were put forward to the community for feedback. Extending the city’s footprint beyond the already identified greenfield growth areas (Lincolnshire Farm, Upper Stebbings and Glenside West) was not well-supported by the community and did not score well in multi-criteria analysis when assessed against other options such as intensification in existing urban areas. Consequently, urban development in Ohariu Valley is not part of Wellington City’s growth strategy as contained in the Spatial Plan³⁹ and echoed in the Wellington Regional Growth Framework⁴⁰. Therefore, I do not agree that it is suitable or necessary to amend the Development Plan by identifying a “Future Urban Area” to provide for a future connection to Ohariu Valley.

³⁹ <https://wellington.govt.nz/your-council/plans-policies-and-bylaws/policies/spatial-plan>

⁴⁰ <https://wrgf.co.nz/wp-content/uploads/2021/08/1320-Wellington-Regional-Growth-Framework-Report-JULY-2021-FINAL-LR.pdf>

Glenside West

175. I agree with Rod Halliday [108.11 using the reference number in his submission] that the area to be vested as reserve should be identified as Natural Open Space. I note that this reserve covers a large proportion of the land identified as Ridgetop area in Glenside West. I consider that identifying this land as Natural Open Space will provide certainty of outcome for the community and align the district plan with the Reserves Agreement. Note: Appendix D to this report shows the recommended amendments to DEV3 mapping which does not include delineating the identified reserve as 'Natural Open Space Area'. While this is one option, my preference is that the underlying zoning be amended to 'Natural Open Space Zone' noting that the reserve boundary extends outside of the Development Area towards Rochdale Drive and Crompton Avenue in an area zoned MRZ under the notified PDP.
176. I address the amendments sought to the Glenside West Development Plan (the second part of point 108.11) together with Mr Halliday's point 108.13 below.
177. Having undertaken a site visit, I can appreciate the topography of the site and that Mr Halliday and his team have progressed earthworks assessments since the Development Plan was prepared – as evidenced by the plan provided by Mr Halliday and appended to this report.
178. As I understand it, master planning for the Upper Stebbings and Glenside West was more focused on Upper Stebbings and as such it was more of a high-level concept and consultation that occurred for Glenside West. While I was not involved in the master planning process, I have reviewed relevant concept plans, consultation documents and engagement reports.
179. Of relevance I note that the Upper Stebbings and Glenside West Development concept, November 2020, identified *'The balance of the rural land in Glenside West (ie land not identified for residential, open space or Department of Corrections use) could either remain in rural use or be rezoned to enable the development of "lifestyle blocks".'* This establishes that 'Large Lot Residential' (LLRZ) was identified and considered to be appropriate within Glenside West, although not carried through into the PDP. Margaret Ellis [48.3] and Heidi Snelson et al [276.37] both sought that Glenside West be rezoned to LLRZ, noting I have responded to these submissions in section 3.9.2. On the basis of my parallel assessment in response to those submission points I do not agree with the submission of Mr Halliday seeking a large lot residential area in Glenside West. Particularly given the overlap with the Ridgetop area I do not consider it would be appropriate to enable housing in the location suggested, and therefore reject the relief sought. That said, I note that under **DEV3-R32** the construction of buildings in the No Build Area is a discretionary activity and could be considered through a resource consent process.

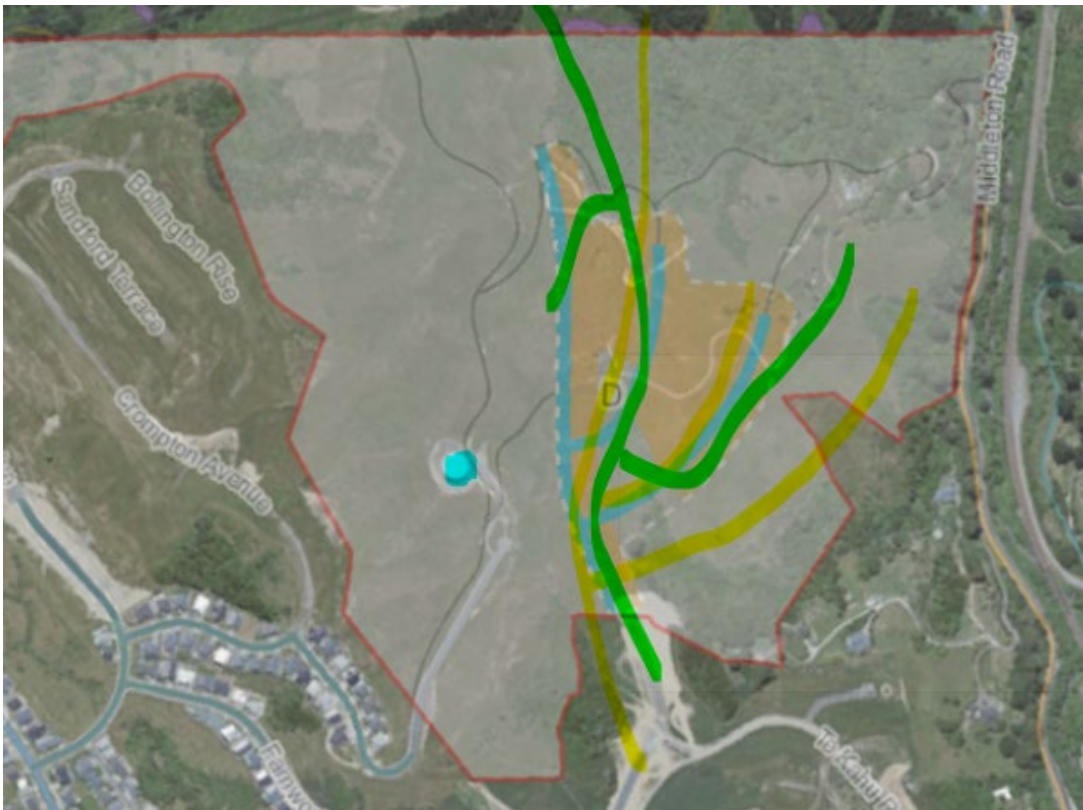


Figure 3: PDP Development Plan showing notified road layout (blue). Overlaid is the November 2020 concept plan (yellow) and Mr Halliday's road proposed road layout (green).

180. As evident in Figure 2 above, the road layout sought by Mr Halliday follows a similar alignment from what is/will be Farnworth Terrace, within what the PDP identified as Medium Density Residential Area. The November 2020 scenario modeling for Glenside West noted that *'further design work is still required to balance earthworks'*. This has now occurred, as per the plan Mr Halliday has provided, and therefore I consider that this is the most appropriate layout to include in the PDP. Noting that at the time of consent, the road layout and lots may be altered from the plan Mr Halliday provided. In this sense, similar to the notified Development Plan, the recommended amended version, still provides that flexibility for development to be 'in general accordance with'.
181. The only matter that is 'a more than minor' difference to the notified development plan is the location of the park/reserve. I have discussed this with Kate Brown, Senior Reserves Planner, WCC and note that the location of the park would only shift 100-150m from the indicative area of the notified Development Plan. The new reserve and neighbourhood park would be more connected to the SNA at the top of the development and connected to walking tracks. The disadvantage is that this park would be slightly further walking distance for residents in the lower section of the 'Reedy block'.
182. I note as well that the development in Glenside West is to occur 'in general accordance with' the Development Plan. While this provides for flexibility in terms of indicative road layout, and location of the neighbourhood park, I consider that given detailed earthworks planning has been undertaken it would be appropriate to update this in the PDP to provide clarity for the community on anticipated development. I have discussed Mr Halliday's relief sought with colleagues in the Reserves, Consents, and District Plan teams. Other than the matter of bulk earthworks, no

concerns were raised as to the refined Development Plan. On this basis, I am comfortable with amending the Development Plan for Glenside West as per Mr Halliday's relief sought, except in relation to large lot residential and discussed above.

Summary of Recommendations

183. **HS6-DEV-Rec25:** That the DEV3 Development Plan map be amended as identified in Appendix D.
184. **HS6-DEV-Rec26:** That submission points relating to DEV3 mapping are accepted/rejected as detailed in Appendix B.

3.9.2 General Points on DEV3

Matters Raised by Submitters

Support for DEV3

185. Wellington City Youth Council [201.41], Tawa Community Board [294.18], VUWSA [123.63], and Oliver Sangster [112.14 and 112.15] support DEV3 and that the Development Area is retained as notified.
186. Oliver Sangster [112.17] supports provision for medium density housing in the Upper Stebbings and Glenside West Development Area and opposes alternative density options (...) that would promote more low density development (e.g. 'lifestyle blocks') in this area as it is one of the last remaining viable greenfield development areas in the city.
187. Richard Herbert [360.5] generally supports DEV3, as it is directed towards providing for development of this new greenfield development area, safeguarding natural resources and green spaces and recognising that this area also adjoins the Outer Green Belt, with areas within the Ridgelines and Hilltops Overlay zone of the existing District Plan.

Road connections

188. Edwin Crampton [21.1], John L. Morrison [28.2], Richard H. Taylor [35.2 and 35.3], Brian Sheppard [169.4] and Heidi Snelson et al [276.41] consider that there is a need for a road connection to join Upper Stebbings with Greyfriars Crescent in Tawa. Heidi Snelson et al [276.2] also seeks that Middleton Road be protected.
189. Waka Kotahi [370.450 and 370.451] seek amendments to make development in DEV3 conditional on infrastructure upgrades being completed, including the intersection between Westchester Drive / Middleton Road / Westchester Drive East, prior to the approach onto State Highway 1. Waka Kotahi also seeks to include specific reference to all development within DEV3 to facilitate multi-modal connections.

Oppose DEV3

190. Margaret Ellis [48.1 and 48.3] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.10]) oppose Glenside West being identified as a Development Area and considers that LLRZ would be a more suitable use considering the topography of the

land.

191. Glenside Progressive Association [374.5 and 374.6] oppose DEV3 in its current form on the basis that the two areas combined is misleading and confusing as to what development is proposed for Upper Stebbings and what is proposed for 395 Middleton Road, Glenside West.
192. Donna Sherlock [384.3] considers that the land is too steep to support 120-150 dwellings, and does not think the water for this catchment can be managed sensitively without harm downstream, with erosion and sediment and flooding.
193. Niki Yosha [178.1] opposes the development of Marshall Ridge in Glenside West, or if development proceeds, amend plans to greatly reduce the number of planned dwellings and to ensure that no house built encroaches in the visual amenity of those living along Rowells and Middleton Roads, and ensure that no gullies are filled, and no streams piped or covered in order to protect current wildlife populations and native bush stands.
194. John Tiley [142.3, 142.21 and 142.23] and Churton Park Community Association [189.3, 189.21 and 189.23] (opposed by Kāinga Ora [FS89.51]) consider that while the map of the Upper Stebbings and Glenside West is grey and bounded as unbuilt, the future intentions attached to the area, revealed by the label "FUZ", suggest residential construction in the future. They seek clarity over where residential development can occur in the FUZ in the Upper Stebbings and Glenside West Development Area.
195. Claire Bibby [329.2] seeks that an archaeological field survey be required for any development in the Glenside West Development Area.

Topography

196. Barry Ellis [47.3 and 47.4] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.8 and FS75.9]) consider that WCC used a flawed survey, and should provide the relevant data that justifies filling in gullies and building over natural streams and springs.
197. Oliver Sangster [112.16] seeks that any development in the DEV3 be done in a way that is sensitive to the environment (particularly with regard to the stream/gully network which feeds into Porirua Stream and ultimately Porirua Harbour).

Assessment

198. In response to Edwin Crampton [21.1], John L. Morrison [28.2], Richard H. Taylor [35.2 and 35.3], Brian Sheppard [169.4] and Heidi Snelson et al [276.41] seeking a new road connection be included in the Development Area to join Upper Stebbings with Greyfriars Crescent in Tawa, I do not consider this to necessary or realistic. As stated in the Future Urban Zone S32 report⁴¹: "*A connection between Upper Stebbings and Tawa was investigated during the initial scoping and investigation work in developing the Upper Stebbings and Glenside West masterplan. A road connecting the two was not feasible for a number of reasons including steep topography, insufficient Tawa connection (only local roads to connect to), impacts on SNA and impact on*

⁴¹ Section 32 Evaluation Report Part 2: Future Urban Zone, Upper Stebbings and Glenside West Development Area and Lincolnshire Farm Development Area, page 117.

skyline / ridgetop." I agree with this statement, particularly as to the steep topography. Given the number of submissions on this matter, I wish to expand on the reasons a road connection between Upper Stebbings and Tawa was considered and dismissed:

Steep topography

- a. The Tonkin and Taylor Upper Stebbings and Glenside West Transport Assessment (October 2020) states that as part of the early optioneering process, a number of alternative road connections were considered but discounted. One such alternative was a connection between Upper Stebbings and Oriel Avenue in Tawa. This would have required a connection via Greyfriars Crescent to reach Oriel Avenue. The report concludes that: *"A road connection would require excessive cuts to achieve the required elevation changes (approximately 140m) to cross over this ridge between the roads on either side. The volume of earthworks required, Significant Natural Areas to be crossed and the restriction on the Development Concept area for residential development through the [Ridgetop] area also means that this road may not achieve commercial viability or be consentable."*⁴²
- b. The upper end of Greyfriars Crescent sits at circa 130m Above Mean Sea Level (AMSL). The ridgeline nearest Greyfriars Crescent sits at between 190m and 200m AMSL. The maximum gradient for secondary roads in the Wellington Code of Practice for Land Development⁴³ is 1 in 10. For a new road to comply with this maximum gradient, the ridgeline would likely need to be significantly lowered through cut. This would have several implications: a) it would create a "notch" in the skyline and undermine the protection of the Ridgetop which the local community has expressed support for; b) it would create a large gap in the Significant Natural Area that separates Churton Park and Tawa and require the removal of considerable areas of established native bush; c) it would require the removal of large amount of cut material off-site with associated transport and environmental effects; d) it would be expensive without creating any additional developable areas to help pay for it. The maximum gradient of 1 in 10 means that the length of the road would be at least 10 times the vertical distance climbed. This would result in a long winding road, not a direct connection.

Lack of suitable road connection on the Tawa side

- c. According to the Wellington Code of Practice for Land Development, Greyfriars Crescent is a "Local Road - Residential cul-de-sac (long)"⁴⁴. Such roads are typically designed to serve a maximum of 40 dwellings with traffic volumes of less than 250 vehicle movements per day. They have a 15m wide road reserve including a 9m carriageway, 1.5m footpaths and berms.
- d. While Greyfriars Crescent has a 15m wide road reserve, its 7.8m carriageway does not comply with the minimum requirements for such roads in the Code. A reduced carriageway

⁴² Upper Stebbings and Glenside West Development Concept Transport Assessment, Tonkin + Taylor, October 2020, page 15.

⁴³ Code of Practice for Land Development, Wellington City Council, 2012, Section C Road Design and Construction, page 12.

⁴⁴ Code of Practice for Land Development, Wellington City Council, 2012, Section C Road Design and Construction, pages 9 and 12.

width would have been considered adequate when the road was built but is not sufficient to support additional traffic. Greyfriars Crescent is a narrow cul-de-sac at the outer edges of the urban area which was not designed to cater for through traffic.

Convoluting connection

- e. The upper end of Greyfriars Crescent is 2km from the Takapu Road Station and involves a convoluted route requiring right turns on Oriel Avenue, Redwood Avenue and Main Road. The upper end of Greyfriars Crescent is 2km from Tawa town centre and involves an equally convoluted route via Oriel Avenue, Larsen Crescent, Ngatitooa Street and Lyndhurst Road.
- f. Allowing through traffic from Stebbings Valley to connect to Greyfriars Crescent would result in additional vehicle movements on all these local residential streets. Residents of Upper Stebbings wishing to drive to the train station or Tawa town centre should be encouraged to use higher order roads, not local residential streets.

Community opposition

- g. During precursor work to the masterplanning process, the Council explored the idea of connecting Upper Stebbings and Takapu Road train station via Sunrise Boulevard. This was strongly opposed by residents of Sunrise Boulevard. This road has similar dimensions to Greyfriars Crescent with a 15m road reserve and 7.8m carriageway. The Sunrise Boulevard residents stated that the narrow width of the road makes it difficult for two vehicles to pass each other when cars are parked on the street and this would be exacerbated by additional traffic. They also felt that they had elected to live in a quiet cul-de-sac and valued the amenity this provides.
 - h. It is reasonable to assume some residents of Greyfriars Crescent would feel the same way as residents of Sunrise Boulevard about a potential increase in traffic on their street. I understand that a connection to Greyfriars Crescent was proposed many years ago, and drew strong opposition from its residents at the time.
199. Turning to Waka Kotahi [370.450 and 370.451] seeking development in DEV3 to be conditional on road upgrades being completed, I disagree for the following reasons:
- a. **Transport strategy:** As stated in section 3.4.1 WCC's transport strategy is to facilitate a shift away from travel reliance on private vehicles through other transport choices including greater use of public transport and active transport modes.⁴⁵ This strategy aligns with the Regional Land Transport Plan 2021–2030 which targets a 35% reduction in transport-generated carbon emissions, and a 40% increase in active travel and public transport mode share⁴⁶. As such, the Council does not normally seek to increase existing road capacity for general traffic. Road capacity improvements focus on bus and active transport infrastructure that moves more people with fewer vehicles. It follows that the Council accepts that there may be some level of congestion and delays on certain roads at peak

⁴⁵ The [Wellington City Spatial Plan \(Key Influences\)](#) states "We want our transport system to: Safely and efficiently move more people with fewer vehicles; Help Wellington achieve the goal of net zero carbon emissions; Give convenient, safe, and accessible choices for people to travel without using cars; Make city streets more attractive and safer places to be; Support urban growth and regeneration.

⁴⁶ [Wellington Regional Land Transport Plan 2021](#).

times. Road users have options to avoid congestion and delays by using other modes of transport or changing their choice of route or time of travel. The adverse effect of congestion on some road users at peak hour does not, in my view, override the beneficial effects of additional housing supply in close proximity to existing areas of employment and local services.

- b. **Sustainable transport modes:** The Council has worked with GWRC / Metlink to ensure that the Development Areas will be serviced by public transport in the future. The Council has also identified a comprehensive network of walking tracks and requires cycling facilities be provided along the new road network to serve the Development Area. On-demand bus services currently being trialed in Tawa may provide a convenient connection to Takapu Road train station for future residents of Upper Stebbings and Glenside West.
- c. **Planned upgrades:** The Council is working on the Tawa to Johnsonville project which aims to improve cycling, walking, public transport and safety by all modes along the Middleton Road / Willowbank Road corridor, including the four roundabouts at Westchester Drive, Main Road, Helston Road, and Moorefield Road, as well as a cycle connection from the Westchester Drive roundabout to Amesbury Drive. Once this project has been implemented, there will be a continuous cycle network connecting Churton Park to Tawa and Johnsonville and beyond. Safety issues identified at any of the four roundabouts included in the project (including the Westchester Drive/ Middleton Road / Westchester Drive East roundabout) are expected to be addressed as part of these works. The Tawa to Johnsonville project is expected to be fully implemented by 2027. As such, it is considered that the corridor and roundabouts will be suitable to support future development from the Development Area.

200. In response to Waka Kotahi [370.450 and 370.451] seeking that all development within DEV3 should facilitate multi-modal connections, I consider that **DEV3-P4.2** already adequately addresses multi-modal connections as follows: *‘Provides safe and convenient access to a well-connected transport network, including roads, public transport links and continuous walking and cycling routes that assist in reducing carbon emissions and traffic congestion’*. I therefore agree in part with the relief sought.

201. Turning to the submissions of Margaret Ellis [48.3], Heidi Snelson et al [276.41], Glenside Progressive Association [374.5 and 374.6], Donna Sherlock [384.3], and Niki Yosha [178.1] opposing Glenside West being identified as a Development Area, I disagree for the following reasons:

- a. I agree with the further submission of Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.10] that:

“The proposed development areas of Upper Stebbings Valley and Glenside West represent logical and planned extensions to the existing urban areas that they adjoin. Infrastructure can be extended to serve these areas including roading, water and drainage as well as power and fibre that has been reticulated to the boundary of these areas. Hydraulic neutrality is also required unless a detention structure provides this attenuation. These new areas are important to accommodate the growing needs of the City and can be well served by public transport (including the #1 Bus). As with all greenfield areas in Wellington, some

earthworks are required to provide access roads and building areas and this is the reality of developing land in Wellington. It has also been necessary to review how much of the ridgelines can be protected to accommodate this growth.”

- b. I also consider that the gullies, streams, Significant Natural Areas, ridgetops, steep topography, archaeology and proximity to existing residents were considered as part of the masterplanning process and have informed the "No Build Areas" within the Development Area⁴⁷. The remaining areas are considered suitable for urban development.
- c. I also refer to my assessment in section 3.2.1 as to why I consider it appropriate for the PDP to identify greenfield Development Areas.

202. I disagree with Margaret Ellis [48.1] suggesting Large Lot Residential would be a more suitable use the land in Glenside West and instead agree with Oliver Sangster[112.17] opposing lower density developments in Upper Stebbings and Glenside West for the following reasons:

- a. Objective 3 of the NPS-UD requires district plans to enable more people to live in areas of an urban environment where there is high demand for housing relative to other areas within the urban environment.
- b. The part of Glenside West proposed for residential development is adjacent to a 98 lot residential subdivision off Farnworth Terrace (SR416389) and within a short distance of the Lower Stebbings (200 lots in East Stebbings and 378 lots in West Stebbings) residential area currently under development. There is high demand for housing in this general location due to the proximity to the Wellington CBD and other urban centres.
- c. Zoning Glenside West for Large Lot Residential would result in the inefficient use of limited greenfield land suitable for development within Wellington City.

203. While I acknowledge the intent of Barry Ellis [47.3 and 47.4] and Oliver Sangster [112.16] seeking the protection of natural features (streams, springs, gullies, native bush stands), I consider that:

- a. The masterplanning process that led to the Development Plan appropriately considered all natural features and these are generally reflected in the No Build Area.
- b. Native bush stands in the Development Area are identified as Significant Natural Areas and managed under the Ecosystems and Indigenous Biodiversity chapter of the PDP.
- c. The protection of water bodies and freshwater ecosystems in the Development Area are managed under the Three Waters provisions of the PDP as well as under the NPS-Freshwater Management and NES-Freshwater. **THW-O1** (Protecting water bodies and freshwater ecosystems) requires that *‘Subdivision and development contributes to an improvement in the health and wellbeing of water bodies and freshwater ecosystems’* and **THW-P1** (Water sensitive design) requires the use of water sensitive design in new subdivision and developments.
- d. The layout of the Development Plan has been planned to generally avoid steep gullies. Bulk earthworks, changes to topography and any potential filling of gullies are managed under

⁴⁷ See Upper Stebbings and Glenside West: Glenside West Concept Masterplan – Design Process and Thinking, Isthmus, November 2020.

the Earthworks chapter of the PDP, by way of example **EW-P3** (Maintaining stability) and **EW-P5** (Effects on earthworks on landform and visual amenity), as well as provisions in regional RMA documents. There is also a policy specific to earthworks in development areas – **EW-P20** which directs that the design of earthworks *‘Incorporates functional overland flowpaths, stream corridors and ponding areas that are capable of conveying flood waters in a manner that minimises risk to existing and new residential properties downstream’*.

- e. Overall, I consider the above provisions are adequate to manage the effects of urban development on natural features in the Development Area.
204. In response to John Tiley [142.3, 142.21 and 142.23] and Churton Park Community Association [189.3, 189.21 and 189.23], I agree in part. I agree that the ‘unbuilt area’ of the Development Plan overlaid with the Future Urban Zone raises confusion as to the future intent. As detailed in paragraph 54 of the Future Urban Zone s42A Report, I recommend that the ‘No build Areas’ of the FUZ be upzoned/rezoned to ‘Natural Open Space Zone’. In my view this will reflect the intent that these areas which comprise SNAs, streams, and the ridgetop area are not envisioned for urban development. This aligns with the directive in **DEV3-P1.2** and **DEV3-R32** that the construction of buildings and structures in the No Build and Natural Open Space Activity Areas are a discretionary activity.
205. In response to Claire Bibby [329.2] seeking that an Archaeological Field survey be required for any development in the Glenside West Development Area, I disagree for the following reasons:
- a. The “Historic Heritage Study for the Upper Stebbings and Marshall Ridge Structure Plan” (Bay Heritage Consultants, 2018) identifies a number of historic heritage items in Glenside West. These items are located near the bottom of the Porirua Stream valley and along the Old Porirua Road that closely followed the stream (now Middleton and Willowbank roads).
 - b. No historic heritage item was identified in the area proposed for development within Glenside West. I therefore consider the requirement for Archaeological Field Surveys for any development in the Glenside West Development Area unjustified.
206. Notwithstanding this, I note that accidental discovery protocol is regularly applied to resource consents, and that explicit reference to this protocol detailed within [APP1 – Historic Heritage Advice Notes](#) was recommended to be made to the Earthworks chapter Introduction (**HS5-EW-Rec57**).⁴⁸

Summary of Recommendations

207. **HS6-DEV-Rec27**: No amendments are recommended to DEV3 in response to submissions on general points.
208. **HS6-DEV-Rec28**: That submission points relating to DEV3 general matters are accepted/rejected as detailed in Appendix B.

3.9.3 Ridgelines and hilltops

⁴⁸ [Earthworks s42A Report](#) prepared for Hearing Stream 5, Paragraph 338.

Matters Raised by Submitters

209. John Tiley [142.1 and 142.22] (supported by Andy Foster [FS86.24, FS86.30, and FS86.31]) and Churton Park Community Association [189.1 and 189.22] (supported by Andy Foster [FS86.35 and FS86.41]) consider the wording ‘to provide a natural backdrop to Upper Stebbings and Tawa valleys and a connected reserves network’ is typical of dealing with all ridgelines and seek a new objective is provided regarding preservation of significant ridgelines, most particularly Marshalls Ridge.
210. Richard Herbert [360.6] and Glenside Progressive Association [374.9] (supported by Andy Foster [FS86.23] and opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.5]) seek to protect the areas designated within the Ridgelines and Hilltops Overlay zone of the Operative District Plan.

Assessment

211. In responding to John Tiley [142.1 and 142.22] and Churton Park Community Association [189.1 and 189.22] seeking greater protection of Marshalls Ridge, I agree. I note the submission of WCC [266.40] identified the absence of the Ridgetop area in the PDP map as an error, and my assessment and recommendation in section 3.9.1 above to include the Ridgetop area in the Development Plan. I also refer to my recommendation in section 3.9.1 that a large part of the Ridgetop area (and adjoining land) in Glenside West be identified as Natural Open Space as it is to be vested with the Council as reserve under an existing Reserves Agreement.
212. I consider that these two amendments, in conjunction with notified policy **DEV3-P4.6**⁴⁹, provide adequate protection of the Ridgetop area in Upper Stebbings and Glenside West and resolves the concerns of the submitters as relevant to the Development Areas chapters. As to the relief sought for a new objective, I agree in part. I address this in section 3.10.1 in response to a similar submission from Heidi Snelson et al [276.42 and 276.43] seeking amendments to **DEV3-O4**.
213. Further to this, and also in response to Richard Herbert [360.6] and Glenside Progressive Association [374.9] seeking to protect the areas designated within the Ridgelines and Hilltops Overlay zone of the Operative District Plan. I firstly consider that the matter of the Ridgelines and Hilltops Overlay is more appropriately addressed in Hearing Stream 8. However, directly applicable to the Development Areas is Marshalls Ridge which I address below.
- a. The mapping approach to Ridgelines and Hilltops taken in the Operative District Plan (based on analysis from Boffa Miskell dated 2001) was high level and generalised over large areas.
 - b. In order to obtain more site-specific information for Upper Stebbings and Glenside West, the Council commissioned Boffa Miskell in 2017 to undertake a more detailed assessment. Figure 3 below, extracted from the Boffa Miskell July 2018 report shows that, on closer examination, some areas of Upper Stebbings and Glenside West identified under the Ridgelines and Hilltops Overlay did not have high visibility either within the communities

⁴⁹ DEV3-P4: Ensure that land development and subdivision in the Upper Stebbings and Glenside West Development Area is undertaken in an integrated and coordinated manner and: ... 6. Protects the natural ridgetop around the Upper Stebbings valley to provide a natural backdrop to Upper Stebbings and Tawa valleys and a connected reserves network;

or within the district.⁵⁰

- c. The No Build Area within the Upper Stebbings and Glenside West Development Plan includes (but is not limited to) the area identified as Ridgetop in the 2018 Boffa Miskell report. Development within the No Build Area is managed under **DEV3-R32** which makes the ‘construction, alteration of and addition to buildings and structures in the No Build and Natural Open Space Activity Areas’ a discretionary activity.
- d. In addition to being included in the No Build Area, the Ridgetop area is subject to more stringent development provisions under **DEV3-R33** which makes the ‘construction of buildings and structures in the Ridgetop’ a non-complying activity.

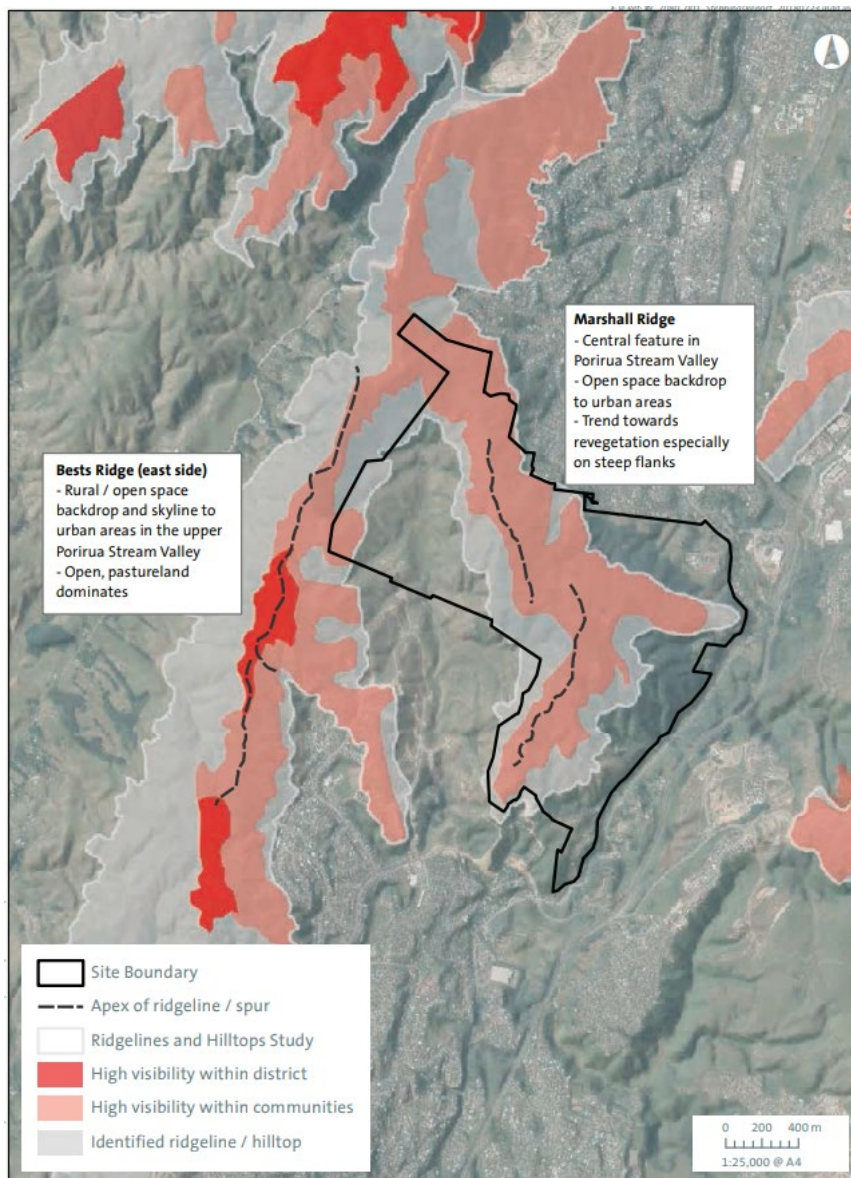


Figure 3: Map comparing areas of high visibility with Ridgelines & Hilltops overlay (Boffa Miskell, Upper Stebbings Valley Landscape and Ecology Analysis, July 2018)

- e. Both the No Build Area and Ridgetop area provide a higher level of protection than would be afforded under the Ridgelines and Hilltops overlay where, under **NFL-R10**, the

⁵⁰ Upper Stebbings Valley, Landscape and Ecology Analysis, Boffa Miskell, July 2018, page 30.

‘Construction of, alteration of and addition to, buildings and structures within the ridgelines and hilltops’ is a permitted activity where ‘compliance can be achieved with the underlying zone provisions and district wide provisions.’

- f. Under the notified PDP, earthworks were more strictly managed within the Ridgetop area than under the Ridgelines and Hilltops overlay. **EW-P20.5** (Earthworks in Development Area) states that earthworks are enabled in Development Areas “*where the design of those earthworks protects Ridgetop areas from inappropriate earthworks.*”⁵¹ Under **EW-R15** (Earthworks within the Ridgetop in the Upper Stebbings and Glenside West Development Area) and **EW-S13** (Earthworks within outstanding natural features and landscapes, within special amenity landscapes and within ridgetop area in the Upper Stebbings Glenside West Development Area), to be considered a Permitted activity, earthworks within the Ridgetop area must not exceed a maximum height of 1.5m and a maximum area of 200m² in total per site in any 5-year period. In contrast, under the notified plan, there were no specific earthworks rules applying to the Ridgelines and Hilltops overlay so **EW-R6** (General earthworks), **EW-S1** and **EW-S2** applied.
- g. Earthworks within the Ridgetop area is a topic that was addressed during Hearing Stream 5 where I recommended that similar provisions apply to both land within the Ridgelines and Hilltops overlay and within the Ridgetop area (expanding the scope of **EW-R15** and **EW-S13** to cover both), with one important difference. I recommended that earthworks within the Ridgetop area only be considered a permitted activity under **EW-R15** (Earthworks within the ridgelines and hilltops overlay or within the ridgetop area of the Upper Stebbings and Glenside West Development Area) if the earthworks are for the purpose of constructing public footpaths or tracks.⁵² Where earthworks within the Ridgetop area are for any other purpose, I recommended that they be considered as a Non-complying activity. This is a stricter regime than for land under the Ridgelines and Hilltops overlay where earthworks are permitted for any purpose, subject to standard EW-S13.
- h. I note that the management of subdivisions within the Ridgetop area was also addressed during Hearing Stream 5 where I recommended⁵³ strengthening the language of **SUB-P17** (Subdivision of land within ridgeline and hilltops overlay or within the ridgetop area of the Upper Stebbings and Glenside West Development Area) so subdivisions are only allowed ‘*where the integrity of the ridgeline is protected*’ and adding a new rule⁵⁴ **SUB-RX** (Subdivision of land within ridgeline and hilltops overlay or within the ridgetop area of Upper Stebbings and Glenside west Development Area) making such subdivision a restricted discretionary activity.
- i. The landscape character assessment contained in the 2018 report considers the local landscape at a fine scale and identifies four sub-characters for the Stebbings Valley: the valley floor, the toe slopes, the mid slopes and the ridgetops. It is the latter sub-character area which has been used as the Ridgetop overlay in the PDP.⁵⁵ The extract below from the

⁵¹ Section 42A Report – Earthworks, paragraphs 566 and 575; HS5-EW-Rec118.

⁵² Section 42A Report – Earthworks, paragraphs 579, 585, 586 and 595; HS5-EW-Rec120.

⁵³ Section 42A Report – Subdivisions, paragraphs 459 and 462; HS5-SUB-Rec87.

⁵⁴ Ibid, paragraphs 461 and 462; HS5-SUB-Rec88.

⁵⁵ Upper Stebbings Valley Landscape and Ecology Analysis, July 2018, Figure 18, page 41.

2018 report shows the 'ridgetop' sub-character area around Marshall Ridge, identified as area 10 in Figure 4:

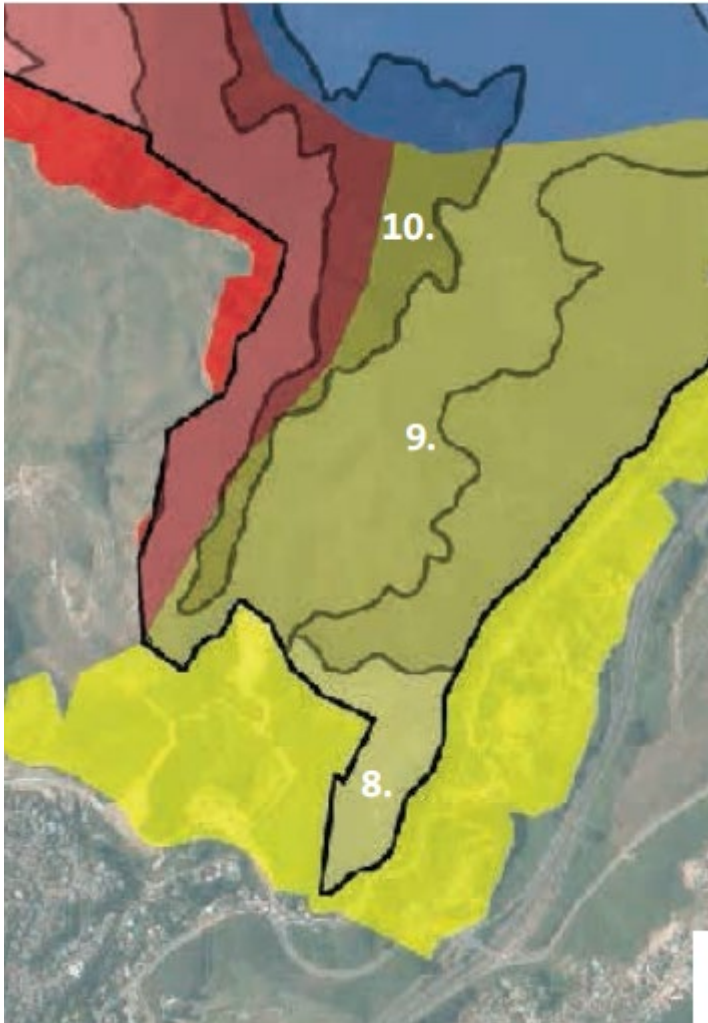


Figure 4: Sub-character areas: area 10 is the "Ridgetop" (Boffa Miskell, Upper Stebbings Valley Landscape and Ecology Analysis, July 2018)

214. Overall, I consider the notified rule framework, as well as amendments recommended as part of Hearing Stream 5, and recommended amendments to **DEV3-O4** address the concerns of submitters as to the protection of Marshall Ridge.

Summary of Recommendations

215. **HS6-DEV-Rec29:** No amendments are recommended to DEV2 in response to submissions on general points.
216. **HS6-DEV-Rec30:** That submission points relating to ridgelines and hilltops are accepted/rejected as detailed in Appendix B.

3.9.4 DEV3 Introduction

Matters Raised by Submitters

217. Transpower [315.188] seek to retain the introduction as notified.

218. Glenside Progressive Association [374.7 and 374.8] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.4]) oppose the statement in the introduction that “*The [Upper Stebbings and Glenside West] areas have been identified for urban development since the 1970s*” and seek that the introduction be amended as follows:

Introduction

The Upper Stebbings and Glenside West developments are some of the final stages of urban development in the northern suburbs. Stebbings Valley was identified for Urban Development after it was sold to a developer in 1979 but Glenside West was only recently decided for development and notified to the public in 2021. ~~The areas have been identified for urban development since the 1970s.~~

219. John L Morrison [28.3] and Richard H. Taylor [35.1] consider the introduction misleading, as Upper Stebbings and Glenside West “do not have easy access to the NIMT railway or the Tawa Town Centre”. They consider that easy access to NIMT railway or Tawa Town Centre would only be available if a connection was provided to Greyfriars Crescent in Tawa. They seek (unspecified) amendments to the introduction.

Assessment

220. In response to Glenside Progressive Association [374.7 and 374.8], I consider that the statement in the notified introduction is correct as it reflects the identification of Glenside (and a new Glenside train station) as a development area in the 1976 Churton, Bridgetown, Grenada Development (Wellington City Corporation) plan. Glenside West is circled in Figure 5 below. That said, I do not consider that the sentence adds materially to the Chapter and, to remove a point of contention, I recommend the sentence be deleted.



Figure 5: Churton, Bridgetown, Grenada Development (Wellington City Corporation, 1976)⁵⁶

221. I agree in part with John L Morrison [28.3] and Richard H. Taylor’s [35.1] seeking clarification to the introduction in relation to access between the development area and the railway spine and town centres. I recommend amendments to the wording in relation to the railway line. I also note that Churton Park and Tawa are zoned Local Centre in the PDP and recommend this terminology is used instead of the reference to ‘town centres’.

Summary of Recommendations

222. **HS6-DEV-Rec31** That the DEV3 introduction be amended as set out below and detailed in Appendix A.

Introduction
 The Upper Stebbings and Glenside West developments are some of the final stages of urban development in the northern suburbs. ~~The areas have been identified for urban development since the 1970s.~~ At a regional level they contribute to a compact urban form by developing greenfield areas within the existing urban extent. They are also strategically located with easy access to State Highway 1 ~~and the railway spine~~ and not far from existing ~~town~~ local centres, and facilities and the railway line.

⁵⁶ Extract from the [s32 Report for Plan Change 45 \(Urban Development Area and Structure Plans\)](#), Page 25.

223. **HS6-DEV-Rec32:** That submission points relating to the DEV3 introduction are accepted/rejected as detailed in Appendix B.

3.10 DEV3 Objectives

3.10.1 DEV3-01, DEV3-02, DEV3-03, DEV3-04

Matters Raised by Submitters

224. Ministry of Education [400.157 and 400.158] seek that **DEV3-01** (Purpose) be amended to explicitly recognise and provide for educational activities as follows:

DEV3-01 Purpose

Upper Stebbings and Glenside West are well-connected neighbourhoods that accommodate new residential growth supported by educational facilities, community and open space activities.

225. Heidi Snelson et al [276.37] oppose **DEV3-01** (Purpose) as they consider that Glenside West is not well-connected, as the plans for the development of this area do not include any link roads to the neighbourhoods of Churton Park, Glenside or Tawa, and the area is not connected to any public transport or local parks. They seek '*reclassification of the area of Glenside West (...) to Large Lot Residential instead of Medium Density Housing. Reducing the number of homes, and instead creating in this area, environmentally low impact lifestyle properties and open public green space and reserves encapsulating and further protecting the two larger and two smaller SNA's within 395 Middleton Road.*'
226. Heidi Snelson et al [276.38, 276.39, and 276.40] oppose **DEV3-02** (Activities and development) and consider that clarity is needed around adherence to 'development AND protection' as follows:

DEV3-02 Activities and development

Activities are carried out in a responsible integrated and coordinated way in adherence to the objectives, policies, rules and standards of the PDP entire.

227. Heidi Snelson et al [276.41] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland [FS75.11]) oppose **DEV3-03** (Amenity and Design) as they consider that the development of 395 Middleton Road is not "well-functioning" because it does not comply with points d, f and g in the definition of "well-functioning urban environment" within the PDP.
228. Heidi Snelson et al [276.42 and 276.43] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland [FS75.12]) seek amendments to **DEV3-04** (Natural environment) to include absolute protection of Marshall Ridge and the steeper ridges and spurs descending into Stebbings Valley and Middleton Road, and to include protection of Significant Natural Areas in Glenside West.

Assessment

229. In response to the Ministry of Education [400.157 and 400.158] seeking to add reference to

educational facilities in **DEV3-O1**, I disagree for the following reasons:

- a. I understand that the Ministry of Education was consulted at the time of the masterplanning and indicated that Amesbury School and other existing schools would accommodate school age children from the Development Area and, therefore, no new schools were required in Upper Stebbings and Glenside West.
- b. Amending **DEV3-O1** as proposed would suggest that new education facilities are expected to be provided within Upper Stebbings and Glenside West. However, based on the feedback from Ministry of Education received during the masterplanning process, no land was set aside for such a purpose.
- c. I note that under **DEV3-R6** educational facilities are a permitted activity and therefore, should the need for a school in **DEV3** arise in the future, the PDP already enables this activity.

230. I disagree with Heidi Snelson et al [276.37] opposing **DEV3-O1** on the basis that Glenside West is not well-connected to public transport or local parks, for the following reasons:

- a. A new neighbourhood park is required to be constructed as part of development in Glenside West and to be accessible for public use at the time the 50th dwelling is constructed (Appendix 13 **DEV3-APP-R4.3**).
- b. Two roads are planned to connect Glenside West to adjoining urban areas: Farnworth Terrace and Te Kahu Road (the link to Westchester Drive). Glenside West is approximately 2km away from the supermarket and other services in Churton Park via Farnsworth Terrace and 1.5km via Te Kahu Road.
- c. Walking tracks are proposed to connect Glenside West with Middleton Road and Melksham Drive (via Prestwich Rise) which are both served by bus routes.
- d. On-demand bus services are currently being trialed in Tawa and Porirua and may in the future provide a convenient connection from Glenside West to local destinations such as Takapu Road train station and Churton Park centre. The On-demand service doesn't have a set route and has flexible pick-up and drop-off points. It allows for quick and efficient shared trips without inconvenient fixed routes and schedules. It also doesn't rely on public transport infrastructure.⁵⁷
- e. I do not consider that lifestyle blocks or Large Lot Residential is a suitable land use activity for the area, for the following reasons:
 - i. It does not make efficient use of the limited supply of greenfield development land in Wellington City – the two greenfield Development Areas are considered to be the last large areas of greenfield land suitable for urban development and should not be used for low density development;
 - ii. I do not agree that Large Lot Residential would necessarily result in 'environmentally low impact lifestyle properties' as significant earthworks would

⁵⁷ Source: <https://www.metlink.org.nz/getting-started/ondemand/> accessed 27/01/2023.

be required to form roads to access these large lots, to create platforms for houses and to accommodate septic tanks. These earthworks would likely have visual, landscape and environmental impacts not dissimilar to those required for medium density housing; and

- iii. SNAs would receive the same level of protection irrespective of the adjoining land use activity.

231. I disagree with Heidi Snelson et al [276.38, 276.39, and 276.40] seeking amendments to **DEV3-O2** to stipulate the need to adhere to the entire PDP, for the following reasons:

- a. The RMA anticipates that some developments will not satisfy every applicable standard in a District Plan. The DEV3 chapter, and other potentially relevant chapters, as listed by the submitter, contain matters of discretion and assessment criteria, in addition to the objectives, policies, rules and standards, to guide resource consent planners assessing applications for such developments. When the PDP is read as whole, I consider there is suitable directive and protections in place contained within for example, the Three Waters, Infrastructure, Earthworks, and Ecosystems and Indigenous Biodiversity chapters.
- b. Every chapter of the PDP includes “Other relevant District Plan provisions” which states that: *‘There may be a number of provisions that apply to an activity, building, structure or site. Resource consent may therefore be required under rules in this chapter as well as other chapters.’* For these reasons I disagree with the relief sought to **DEV3-O2**.

232. I disagree with Heidi Snelson et al [276.41] opposing **DEV-O3** on the basis that Glenside West will not result in a “well-functioning urban environment” and instead agree with the further submission of Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland [FS75.11]. I respond to Heidi Snelson et al’s detailed submission points below:

- a. **Good accessibility for all people between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport:** I have addressed the issue of accessibility in relation to **DEV3-O1** above.
- b. **Supports reduction in greenhouse gas emissions:** Compared to residential development further out in the Wellington region, development in Glenside West is well-located to reduce greenhouse gas emissions from transport. Future residents of Glenside West will be a short distance away from employment opportunities in Grenada North and Lincolnshire Farm and a short train commute away from the largest hub of employment in the region - the Wellington CBD. They will be closer to the universities, hospitals, cultural venues and other regional facilities located in Wellington City than residents in more distant locations, thus resulting in the potential for fewer kilometres travelled and lower emissions.
- c. **Resilient to the current and future effects of climate change:** The areas in Glenside West identified for future development are not at risk of rising sea levels and coastal erosion, as is common in other parts of the city and region. Other likely impacts of climate change are heavier rainfall and associated flooding and erosion – this is reflected in the need for hydraulic neutrality and water sensitive design (under the Three Waters Chapter) and the design of earthworks (under the Earthworks Chapter and GWRC’s plans and policies).

233. I agree with the intent of Heidi Snelson et al [276.42 and 276.43] seeking protection of Marshall Ridge. The matter of the Ridgetop area, and more broadly ridgelines and hilltops, is further discussed in section 3.9.3. In summary, Marshall Ridge is part of the Ridgetop area in the Development Plan. This was omitted from the PDP by error and I support WCC’s amendment to include it in the District Plan. Under **DEV3-R33** the ‘Construction of buildings and structures in the Ridgetop’ is a non-complying activity with supporting policy direction in **DEV3-P4.6**: ‘Protects the natural ridgetop around the Upper Stebbings valley to provide a natural backdrop to Upper Stebbings and Tawa valleys and a connected reserves network’. I consider that the policy and rule framework for the Ridgetop area, as detailed in section 3.9.3, is sufficient to protect Marshall Ridge from inappropriate development.
234. However, given the ridgetop area sits separately to the ‘ridgelines and hilltops’ overlay that is addressed in the Natural Features and Landscapes provisions, there is no specific objective to support the DEV3 policy or non-complying activity status. I consider that an objective similar to NFL-O3 would be appropriate to recognise the value of the Ridgetop to the community and seek that the natural green backdrop is maintained. I therefore recommend that **DEV3-O4** be amended to include reference to the ridgetop area.

Summary of Recommendations

235. **HS6-DEV-Rec33**: That DEV3-O1, DEV3-O2, and DEV3-O3 be confirmed as notified.
236. **HS6-DEV-Rec34**: That DEV3-O4 is amended as set out below and detailed in Appendix A:

DEV3-O4 Natural Environment

The natural green backdrop provided by the ridgetop and Aaccess to and within natural open space is maintained and enhanced as part of the comprehensive urban development of the area.

237. **HS6-DEV-Rec35**: That submission points relating to DEV3 objectives are accepted/rejected as detailed in Appendix B.

3.11 DEV3 Policies

3.11.1 DEV3-P1, DEV3-P2, DEV3-P3, DEV3-P4, DEV3-P5

Matters Raised by Submitters

238. John Tiley [142.24, 142.25, 142.27, and 142.29] and Churton Park Community Association [189.24, 189.25, 189.27, and 189.29] consider that **DEV3-P2** to **DEV3-P5** (excluding **DEV3-P4.6**) focus entirely on development without regard for adverse effects and seek that these policies are amended to not just focus on development but show regard for the adverse effects of development.

DEV3-P1

239. John Tiley [142.23] and Churton Park Community Association [189.23] seek that **DEV3-P1** (Activities) is amended to provide a clear statement that a No Build Area means no building without compromise.

240. Heidi Snelson et al [276.44 and 276.45] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland [FS75.13]) consider that the policy is too softly worded suggesting 'non-build spaces' are available predominantly for facilitating construction or residential facilitation, and seek that **DEV3-P1** be amended to clarify that construction of residential buildings is contained entirely within Build Areas, and to give No Build Areas protection.

DEV3-P2

241. Heidi Snelson et al [276.46 and 276.47] oppose **DEV3-P2** (Residential activities) on the basis that weak language could signal a minimal need to adhere, and consider that the terms 'encourage' and 'intent' are weak and should be replaced by 'require' and 'requirement' respectively to signal the need for strict adherence to policies, principles and guidelines within the PDP.
242. Heidi Snelson et al [276] seek a number of amendments to **DEV3-P2** in relation to 395 Middleton Road, as follows:
- a. [276.48] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.14]) seeks to *'amend residential build guidelines to specify low impact design requirements, around colour, form, visual impact, noise and light pollution'*.
 - b. [276.49] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS75.15]) seeks that *'Guidelines also need to require hydraulic neutrality with comprehensive storm water infrastructure to mitigate against hard surfaces in an area prone to heavy rainfall impacts and with Porirua Stream and Te Awarua-o-Porirua directly impacted by 'downstream effects.'*
 - c. [276.50] raises concerns that *'The area is also prone to high wind impacts. Considered planting of native species will be required to protect housing and associated activities from the high wind impacts associated with the area and the altitude and exposure.'*

DEV3-P3

243. Heidi Snelson et al [276.51] considers that the wording 'adverse effects are appropriately managed' is too weak and seeks an amendment to **DEV3-P3** (Potentially compatible activities) to indicate that activities can occur only if protections (of natural contours, water courses, landforms, SNAs and no build areas) are in place.

DEV3-P4

244. FENZ [273.358] and Richard Herbert [360.7] seek that **DEV3-P4** (Coordinated development) is retained as notified.
245. John Tiley [142.26, 142.27, and 142.28] (supported by Andy Foster [FS86.32]) and Churton Park Community Association [189.26, 189.27, and 189.28] support **DEV3-P4.6** but seek that **DEV3-P4.6** is amended to include regard for the adverse effects of development, and the Stebbings Valley ridgelines, including Marshalls Ridge (not restricted to just Upper Stebbings Valley ridgelines).
246. Heidi Snelson et al [276.52] (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd and Stebbings Farmland [FS74.16]) seek that **DEV3-P4** is amended to include absolute protection of Marshall's Ridge consistent with the intent of the ODP Ridgelines and Hilltops overlay introduced by Plan Change 33. Heidi Snelson et al [276.54] also seek to include Marshall Ridge as

a consideration under **DEV3-P4.6**.

247. Heidi Snelson et al [276.53] also oppose **DEV3-P4** as they consider that 395 Middleton Road is not well connected.

DEV3-P5

248. Kāinga Ora [391.755 and 391.756] seek that **DEV3-P5** (Amenity and design) is amended to remove direct reference to the design guides (note: Kāinga Ora’s relief only showed deletion of reference to the Residential Design Guide) and instead articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPS-UD, as follows:

DEV3-P5 Amenity and Design

Require new development, and alterations and additions to existing development in the Lincolnshire Farm Development Area to positively contribute to the creation of a well functioning urban environment by ensuring that it:

1. ~~Fulfils the intent of the Subdivision Design Guide and Residential Design Guide~~
Achieves the following urban design outcomes:
 - a. Provides an effective public private interface;
 - b. The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;
 - c. Provides high quality buildings.
 - d. Responds to the natural environment.
2. Adds visual diversity and interest through the overall street design and the form, landscaping, design, and siting of buildings.
3. ...

Assessment

249. In response to John Tiley [142.24, 142.25, 142.27, and 142.29] and Churton Park Community Association [189.24, 189.25, 189.27, and 189.29] I consider that the masterplanning process for Upper Stebbings & Glenside West⁵⁸ has taken into consideration the potential effect of development on ridgetops, significant natural areas, streams, gullies, ecology, flooding, landform, transport networks, three water infrastructure, historic heritage and Māori values. The resultant Development Plan balances the potential adverse effects of urban development with the positive effects of providing housing in an area of high demand. I therefore disagree with the relief sought and do not consider that any amendments are necessary.

250. DEV3-P1

251. I agree with John Tiley [142.23], Churton Park Community Association, [189.23], and Heidi Snelson et al [276.44, 276.45] in relation to the intent of the No Build Areas, however I do not consider that amendments to **DEV3-P1** are necessary.

⁵⁸ Upper Stebbings & Glenside West – Glenside West Concept Masterplan – Design Process & Thinking, Isthmus, November 2020 and Stebbings Structure Plan - Upper Stebbings Concept Masterplan – Design Process & Thinking, Isthmus, February 2020

252. Firstly, I note that the introduction of DEV3 is clear about the types of activities anticipated in the No Build Area. These include *“a mix of natural open space and the balance of residential lots”* as well as *“land located under existing transmission lines”*. It states that *“while no residential buildings are anticipated in the no build area, it is expected that earthworks to facilitate the Development Plan layout and residential building platforms will be required in the no build area, for example for access and creation of building platforms in the build area. It is also expected that residential lots will encompass both build and no build areas.”* The policies and rules follow on from the explanatory comments in the introduction.
253. Under **DEV3-R32** the ‘Construction, alteration of and addition to buildings and structures in the No Build and Natural Open Space Activity Area’ is a discretionary activity. In assessing a resource consent for such an activity, the processing planner would need to consider the relevant objectives and policies, including **DEV3-P1** which in my view is clear that the activities enabled under **DEV3-P1.2** are only those to facilitate residential development within the Build Areas (i.e. earthworks) and would not include residential buildings outside the Build Areas.
254. I consider it acceptable that an accessory building or structure ancillary to a residential activity (i.e. garden shed) in the No Build Area could be considered through a consenting process. I note that overlays apply to the No Build Areas including the Ridgetop and Significant Natural Areas which provide protection of specific features located within the No Build Areas.
255. While residential buildings are to be contained in the Built Area, I consider that ‘activities that facilitate residential activities’ i.e. fences and standalone walls (**DEV3-R29**) are appropriate to be constructed in the ‘No Build Area’ as a permitted activity were compliance is achieved with DEV3-S13. I therefore disagree that **DEV3-P1** should be amended or there is a need for further restrictions on activities within the No Build Area.

DEV3-P2

256. In response to Heidi Snelson et al [276.46 and 276.47] seeking more directive wording in **DEV3-P2** (Residential activities), I disagree for the following reasons:
- a. The policy uses the word ‘encourage’ rather than ‘require’ because it would not be reasonable to expect every resource consent application for residential activity within the DEV3 area, irrespective of the scale of development, to 1) provide a mix of housing types, sizes and density, 2) comprise a mix of detached and attached dwellings including smaller one- and two-bedroom dwellings and 3) cater for people of all ages, lifestyles and abilities. Developments comprising a small number of dwellings may not have much scope for providing a mix of attached and detached units, or to cater for people of all lifestyles. Requiring these features would mean deterring, for example, a development comprising half a dozen townhouses or a small apartment building on the basis that they do not meet all clauses of the policy.
 - b. Turning to the policy wording *‘fulfil the intent of the Subdivision Design Guide and Residential Design Guide’* and the suggestion that the word ‘intent’ be replaced with ‘requirement’, I disagree. I firstly note that reference to the Subdivision Design Guide should be deleted on the basis of Ms Stevens and my recommendation to delete the

Subdivision Design Guide in its entirety as part of the ISPP Wrap Up Hearing.⁵⁹ Reference to *‘Fulfil the intent’* is consistent with how the Design Guides are referenced throughout the PDP and aligns with recommendations in the Wrap Up Hearing to make this policy wording consistent.⁶⁰

257. I disagree with Heidi Snelson et al [276.48] seeking amendments to **DEV3-P2** to include low impact design guidelines for Glenside West for the following reasons:

- a. The wider environment within which Glenside West sits is urbanised with existing and planned residential and industrial activities nearby. Glenside West is located within proximity of the North Island Main Trunk Railway Line, State Highway 1, the consented 100 lot development off Farnworth Terrace (SR416389), the 10,700m² NZ Post Wellington Sorting Centre and existing subdivisions at Lincolnshire Farm, to name a few urban features of the area.
- b. The visibility of future houses from existing houses is a normal situation in an urban environment and not something the PDP needs to avoid or mitigate, as directed by the NPS-UD.

Objective 4 of the NPS-UD states:

‘New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.’

Policy 6 of the NPS-UD states:

‘When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (...) (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

- (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
- (ii) are not, of themselves, an adverse effect’*

- c. The Residential Design Guide includes relevant and appropriate guidelines in response to the submitters concerns including by way of example guidelines pertaining to designing with topography, design coherence and integration, and visual privacy. These guidelines, in addition to other provisions of the PDP, including provisions within the Noise and Light chapters, in my view appropriately respond to the matters raised. In particular, NOISE-P1 (General management of noise) *‘enables the generation of noise from activities that: 1) Maintain the amenity values of the receiving environment; and 2) Do not compromise the health, safety and wellbeing of people and communities.’* I also note that the effects of light

⁵⁹ [ISPP Wrap Up Hearing – Subdivision Design Guide Review Right of Reply](#), Paragraphs 51, and 74-75.

⁶⁰ [ISPP Wrap Up Hearing – Design Guides s42A Report](#), Paragraphs 204-211.

on neighbouring properties through light spill or glare is managed under the Light chapter, and that LIGHT-P2 (Design and location of outdoor artificial lighting) *'requires outdoor artificial lighting to be designed, located and oriented to maintain amenity values, traffic safety, aviation safety and to minimise effects on wildlife in coastal margins.'*

258. I agree with the intent of Heidi Snelson et al [276.49] seeking a requirement for hydraulic neutrality, however hydraulic neutrality and water sensitive design are required under the Three Waters chapter and need not be repeated in the Development Area chapter. On this basis I reject the relief sought.
259. I disagree with Heidi Snelson et al [276.50] seeking **DEV3-P2** be amended to include high wind protection. The Wind chapter of the PDP is concerned with the adverse effect of wind on public spaces and applies to larger scale buildings (20m or higher). In suburban areas where buildings are less than 20m high, wind is primarily a consideration at the building consent stage and informs the structural requirements and weather tightness requirements. I do not consider that there is a need for specific provisions in relation to high wind in Glenside West.

DEV3-P3

260. In response to Heidi Snelson et al [276.51], I disagree that amendments to **DEV3-P3** are necessary as I consider that the chapeau to the policy 'Only allow activities...' provides a strong directive. In addition, when the PDP is read as whole, I consider there is suitable directive and protections in place contained within the Three Water, Infrastructure, Earthworks, and Ecosystems and Indigenous Biodiversity chapters. This however raises the matter of the introductory comment to the DEV3 chapter which states *'Where there are any inconsistencies between provisions for the underlying zoning or district wide matters and the provisions in this Development Area chapter, the provisions in this chapter shall prevail'*.
261. In considering the submission of Ms Snelson, my view is that development within Development Areas should not take precedence over provisions in district wide matters or underlying zone chapters. While the Development Area chapters have been prepared with consideration to the potential effect of development on ridgetops, significant natural areas, streams, gullies, ecology, flooding, landform, transport networks, three waters infrastructure, historic heritage and Māori values, I consider that provisions in the district wide matter chapters should still be a relevant consideration. I therefore recommend that this statement in the Introduction be deleted.

DEV3-P4

262. I disagree with Heidi Snelson et al [276.53] opposing **DEV3-P4** (Coordinated Development) on the basis that Glenside West is not well connected for the reasons set out in section 3.10.1 where I respond to a similar submission point of Heidi Snelson et al in relation to **DEV3-O4**.
263. Turning to John Tiley [142.26, 142.27, and 142.28], Churton Park Community Association [189.26, 189.27, and 189.28], and Heidi Snelson et al [276.52 and 276.54] seeking amendments to **DEV3-P4.6** to specifically protect Marshall Ridge. I do not consider that specific mention of Marshalls Ridge is necessary to include given the directive of the policy to 'protect the natural ridgetop' in conjunction with the rule framework (**DEV3-R33**), and amendment to identify the Ridgetop area in the Development Plan. The matter of the Ridgetop area, and more broadly ridgelines and hilltops, is further discussed in section 3.9.3.

DEV3-P5

264. In response to Kāinga Ora [391.755 and 391.756] seeking amendment to **DEV3-P5** (Amenity and design) to remove direct reference to design guides, I refer to my parallel assessment in section 3.4.4 where I respond to similar submission points [391.745 and 391.746] in relation to **DEV2-P5**. For the same reasons, I disagree with deletion of reference to the Residential Design Guide. However, I agree that reference to the Subdivision Design Guide be deleted on the basis of Ms Stevens and my recommendation to delete the Subdivision Design Guide in its entirety as part of the ISPP Wrap Up Hearing.⁶¹ Ms Stevens and I also recommended deletion of references to the Subdivision Design Guide in **DEV3-P3.4** and **DEV3.P5.1**.⁶²

Summary of Recommendations

265. **HS6-DEV-Rec36:** That DEV3-P1, DEV3-P2, and DEV3-P4 be confirmed as notified.
266. **HS6-DEV-Rec37:** That references to the Subdivision Design Guide are deleted from **DEV3-P3.4** and **DEV3.P5.1** as detailed in Appendix A.
267. **HS6-DEV-Rec38:** That submission points relating to DEV3-P1, DEV3-P2, DEV3-P3, DEV3-P4, and DEV3-P5 are accepted/rejected as detailed in Appendix B.

3.12 DEV3 Rules

3.12.1 All DEV3 rules: DEV3-R1 through to DEV3-R33

Matters Raised by Submitters

268. Ministry of Education [400.159] seek that **DEV3-R6** (Educational Facilities) is retained as notified.
269. FENZ [273.359] seek that **DEV3-R7** (Emergency Service Facilities) is retained as notified.
270. GWRC [351.321 and 351.322] support the permitted activity status for the demolition of buildings provided that building waste is properly disposed of, noting that this gives effect to Policy 34 of the operative RPS. However, they seek an amendment to **DEV3-R26** (Demolition or removal of buildings and structures) to include a rule requirement that permitted activity status is subject to building and demolition waste being disposed of at an approved facility.

⁶¹ [ISPP Wrap Up Hearing – Subdivision Design Guide Review Right of Reply](#), Paragraph 51.

⁶² [ISPP Wrap Up Hearing – Subdivision Design Guide Review Right of Reply](#), Paragraphs 74-75.

271. Kāinga Ora [391.757 and 391.758] seek amendments to **DEV3-R27** (Construction, addition or alteration of residential buildings and structures including accessory buildings, but excluding multi-unit housing - Built Areas) to allow the rule to apply to all buildings not just those associated with no more than three residential units on a site, as follows:

DEV3-R27 Construction, addition or alteration of residential buildings and structures including accessory buildings ~~but excluding multi-unit housing – Built Areas~~

2. Activity Status: **Permitted**

Where:

- a. There are no more than three residential unit on a site; and
b. Compliance is achieved with:

...

272. Kāinga Ora [391.757 and 391.758] also seek amendment to **DEV3-R27** to remove the reference to MRZ-P10 (Vegetation and landscaping) which it opposes, however their relief sought seeks reference to GRZ-P8 be corrected to MRZ-P8 (Residential buildings and structures).
273. Kāinga Ora [391.759 and 391.760] seek amendments to **DEV3-R28** (Construction of buildings, accessory buildings or structures for multi-unit housing or a retirement village, and additions or alterations to multi-unit housing or a retirement village – Built Areas) so it only applies to retirement villages (ie excludes multi-unit housing) and removes the reference to MRZ-P10.

274. Kāinga Ora [391.761 and 391.762] also seek amendment to **DEV3-R28** to preclude limited notification for developments that comply with the relevant standards. The amendments sought to **DEV3-R28** are as follows:

DEV3-R28 Construction of buildings, accessory buildings or structures for ~~multi-unit housing or a retirement village~~, and additions or alterations to ~~multi-unit housing or a retirement village~~ — Built Areas

2. Activity status: Restricted Discretionary

Matters of discretion are:

5. The extent and effect of non-compliance with any of the follow standards as specified in the associated assessment criteria for any infringed standard:
 - i. DEV3-S1;
 - ii. DEV3-S2;
 - iii. DEV3-S3;
 - iv. DEV3-S4;
 - v. DEV3-S5;
 - vi. DEV3-S12;
 - vii. DEV3-S13;
 - viii. DEV3-S14; and
 - ix. DEV3-S15; and
6. The extent and effect of non-compliance with the requirements in Appendix 13;
- ~~7. The matters in DEV3-P2, DEV3-P4, DEV3-P4, MRZ-P6, and MRZ-P10 for multi-unit housing; and~~
8. The matters in DEV3-P2, DEV3-P5, and MRZ-P5, and MRZ-P10 for a retirement village.

Notification status: An application for resource consent made in respect of rule DEV3-R28.1 is precluded from being publicly notified.

An application for resource consent made in respect of rule DEV3-R28.1 that complies with the relevant standards is precluded from public and limited notification.

Assessment

275. In alignment and continuation of my recommendation in response to Kāinga Ora [391.742]⁶³ to delete the FUZ in its entirety and upzone Upper Stebbings and Glenside West to the intended zoning, I consequentially recommend deletion of the DEV3 rules identified in Appendix C. I refer to my parallel assessment, recommendation, and s32AA evaluation contained in section 3.6.1 in relation to DEV2 rules.

276. As set out in Appendix C, these DEV3 rules are a direct ‘twin’ of the relevant ‘sister’ zone rules. Therefore, I am of the view that these DEV3 rules add no additional value beyond what is

⁶³ See Hearing Stream 6 Future Urban Zone s42A Report

otherwise addressed by the MRZ and NOSZ rules.

- a. Upon upzoning the 'Medium Density Residential Area' to MRZ - DEV2-S6, DEV2-S7, DEV2-S8, DEV2-S9, DEV2-S10, DEV2-S11, DEV2-S12, DEV2-S13, DEV2-S14, DEV2-S15, DEV2-S16, DEV2-S17, DEV2-S18, DEV2-S19, and DEV2-S20 will be superseded by MRZ rules as demonstrated in Appendix C.
 - b. Upon upzoning the 'Natural Open Space Activity Area' to NOSZ - DEV2-S21, DEV2-S22, DEV2-S23, and DEV2-S14 will be superseded by NOSZ rules as demonstrated in Appendix C.
277. While I recommend deletion of these notified DEV3 rules, I recommend the DEV3 rules without equivalent provisions in the 'sister' zones be retained as notified.
278. For completeness, and if the panel were of mind to retain the FUZ, I have assessed all submission points on DEV3 rules below.
279. I disagree with the amendment sought by GWRC [351.321 and 351.322] relating to the requirement for disposal of building waste at approved facilities. As I addressed in Hearing Stream 4⁶⁴, it would be an impractical requirement to enforce given the difficulties of tracking waste from the many demolition projects that occur across the city. In addition, the Solid Waste Management and Minimisation Bylaw 2020 deals with construction waste and all persons undertaking demolition are required to comply with this.
280. I agree with Kāinga Ora [391.757 and 391.758] that reference to GRZ-P8 be amended to MRZ-P8 (Residential buildings and structures) in the matters of discretion for **DEV3-R27**. This is a drafting error which should be corrected.
281. In response to all other amendments sought by Kāinga Ora [391.757, 391.758, 391.759, 391.760, 391.761 and 391.762] to **DEV3-R27** and **DEV3-R28** I refer to my parallel assessment and reasoning in section 3.6.1 of this report related to **DEV2-R44** and **DEV2-R45**. My recommendation being that, if these rules are to be retained, that DEV3-R27 and DEV3-R28 should be amended in a manner consistent with Mr Patterson's recommendations for the 'sister' rules MRZ-R13 and MRZ-R14.

Summary of Recommendations

282. **HS6-DEV-Rec39:** That **DEV3** rules be deleted and **DEV3** rules be retained as detailed in Appendix A and the associated assessment contained in Appendix C.
283. **HS6-DEV-Rec40:** That submission points relating to **DEV3** rules are accepted/rejected as detailed in Appendix B.
284. **Alternative recommendation:** If the Panel were of mind to retain the FUZ, I recommend that the **DEV3** rules be amended in a manner consistent with their 'twin' provisions. This would need to occur following receipt of decisions on the ISPP and Hearing Stream 7.

3.13 DEV3 Standards

⁶⁴ [General Industrial Zone s42 Report prepared for Hearing Stream 4](#), Paragraph 186.

3.13.1 All DEV3 standards: DEV3-S1 through to DEV3-S19

Matters Raised by Submitters

285. FENZ seeks amendments to exclude “*emergency service facilities up to 9m in height and hose drying towers up to 15m in height*” from the following standards:
- a. [273.360 and 273.361] **DEV3-S1** (Building height)
 - b. [273.352 and 273.353] **DEV3-S3** (Height in relation to boundary)

Assessment

286. In alignment and continuation of my recommendation in response to Kāinga Ora [391.742]⁶⁵ to delete the FUZ in its entirety and upzone Upper Stebbings and Glenside West to the intended zoning, I consequentially recommend deletion of the DEV3 standards identified in Appendix C.
287. As set out in Appendix C, these DEV3 standards are a direct ‘twin’ of the relevant ‘sister’ zone standards. Therefore, I am of the view that these DEV3 standards add no additional value beyond what is otherwise addressed by the MRZ and NOSZ standards.
- a. Upon upzoning the ‘Medium Density Residential Area’ to MRZ - DEV2-S6, DEV2-S7, DEV2-S8, DEV2-S9, DEV2-S10, DEV2-S11, DEV2-S12, DEV2-S13, DEV2-S14, DEV2-S15, DEV2-S16, DEV2-S17, DEV2-S18, DEV2-S19, and DEV2-S20 will be superseded by MRZ standards as demonstrated in Appendix C.
 - b. Upon upzoning the ‘Natural Open Space Activity Area’ to NOSZ - DEV2-S21, DEV2-S22, DEV2-S23, and DEV2-S14 will be superseded by NOSZ standards as demonstrated in Appendix C.
288. While I recommend deletion of these notified DEV3 standards, I recommend the DEV3 standards without equivalent provisions in the ‘sister’ zones be retained as notified.
289. For completeness, and if the panel were of mind to retain the FUZ, I have assessed all submission points on DEV3 standards below.
290. In response to FENZ [273.360, 273.361, 273.362, and 273.363], I disagree with the relief sought for the reasons set out in my parallel assessment in section 3.6.1 of this report where I respond to similar submission points from FENZ in relation to **DEV2-S6** and **DEV2-S8**. I reach the same conclusion here, that the effects of an over-height tower are most appropriately considered through a resource consent process and, therefore, an exclusion is not warranted.

Summary of Recommendations

291. **HS6-DEV-Rec41:** That **DEV3** standards be deleted and **DEV3** standards be retained as detailed in Appendix A and the associated assessment contained in Appendix C.
292. **HS6-DEV-Rec42:** That submission points relating to **DEV3** standards are accepted/rejected as detailed in Appendix B.
293. **Alternative recommendation:** If the Panel were of mind to retain the FUZ, I recommend that the

⁶⁵ See Hearing Stream 6 Future Urban Zone s42A Report

DEV3 standards be amended in a manner consistent with their ‘twin’ provisions. This would need to occur following receipt of decisions on the ISPP and Hearing Stream 7.

3.14 APP13 – Upper Stebbings and Glenside West Development Area

Matters Raised by Submitters

294. Claire Nolan et al [275.47] seek that Appendix 13 is retained as notified.
295. Transpower [315.196] seek that **DEV3-APP-R1** (Open Spaces) is retained as notified.
296. WCC [266.174] seek amendments to **DEV3-APP-R1.5** to provide better cross reference between the Development Plan maps and appendices, as follows:

The neighbourhood parks ~~required by DEV3-APP-R1.5~~ must be constructed and accessible for public use at the time the 100th dwelling within the relevant neighbourhood park catchment area, shown on the Development Plan maps as catchment areas A to C, is constructed.

297. John L Morrison [28.4], Colin Roy Miller [34.1], and Richard H. Taylor [35.4] consider that **DEV3-APP-R2** (Roads) does not include an acceptable road connection and seek that **DEV3-APP-R2** be amended to specify ‘*A local road shall be constructed to connect Melksham Drive/ Rochdale Drive in Upper Stebbings Valley to Greyfriars Crescent Tawa*’. Edwin Crampton [21.2] and Brian Sheppard [169.5] also seek a new road connection to Greyfriars Crescent.

298. WCC [266.175] seek amendments to **DEV3-APP-R4.3** to provide better cross reference between the Development Plan maps and appendices, as follows:

The neighbourhood park ~~required by DEV3-APP-R4.3~~ must be constructed and accessible for public use at the time the 50th dwelling is constructed within catchment area D shown on the Development Plan map.

299. Richard Herbert [360.8 and 360.9] supports ‘*the direction to provide for development of this new greenfield development area and the safeguards taken to protect the natural resources and green spaces and recognising that this area also adjoins the Outer Green Belt and has areas within the Ridge Lines and Hilltops Overlay zone of the existing District Plan.*’ However, he seeks ‘*amendment of the Development Area and Appendix as appropriate to retain the areas designated within the Ridge Lines and Hilltops Overlay zone of the existing District Plan.*’

300. Glenside Progressive Association [374.10] seek that **DEV3-APP-R5** (Roads) is retained as notified.

301. Rod Halliday [25.57, 25.58, and 25.59] (opposed by Glenside Progressive Association [FS4.4, FS4.5, and FS4.6] and Heidi Snelson [FS24.11, FS24.12, and FS24.13]) seeks amendments to **DEV3-APP-R5** as he considers that the planned intersection designed to link the Glenside West Development Area and Westchester Drive has already been approved as part of subdivision consent SR No. 416389 and, therefore, the multi-modal safety audit to assess the safety of the intersection required under **DEV-APP-R5.2** is not necessary. Similarly, he considers that the requirement for cycling and pedestrian connections through the intersection are no longer possible due to the design being approved and the plan being part of the approved documents. In their further submission Glenside Progressive Association seeks for the intersection to be built

now, ahead of development.

Assessment

302. I agree with WCC [266.174 and 266.175] that the amendments sought will provide clarity and better cross referencing between the Development Plan maps and appendices. I recommend that both clauses be amended with consistent wording.
303. In response to Richard Herbert [360.8 and 360.9], I refer to section 3.9.3 where I address the matter of ridgelines and hilltops. By way of summary, I consider that Marshall Ridge is adequately protected through the Development Area provisions. The broader matter of how the protection of ridgelines and hilltops compares to protections in the ODP will be addressed in Hearing Stream 8.
304. In response to John L Morrison [28.4], Colin Roy Miller [34.1], Richard H. Taylor [35.4], Edwin Crampton [21.2], and Brian Sheppard [169.5], I have addressed the road connection between Upper Stebbings and Greyfriars Crescent in section 3.9.2. I refer to my assessment and reasoning in response to similar submission points on this matter where I conclude that the suggested road connection is not necessary or realistic.
305. I disagree with Rod Halliday [25.57, 25.58, and 25.59] seeking the removal of the requirement for a safety audit from **DEV-APP-R5** and instead agree with the further submission of Heidi Snelson et al [FS24.11]. My reasons are:
- a. The original intersection design was associated with a subdivision for circa 100 residential lots under SR416389 (Reedy Stage 2 subdivision). At the time of this subdivision (2018), the Council had not started detailed investigations in relation to further development in Glenside West and, therefore, the intersection would not have been designed to accommodate further growth.
 - b. Further, the Council is currently investigating cycling, walking, public transport and safety improvements between Johnsonville and Tawa, including a cycle connection along Westchester Drive to Amesbury Drive. As the intersection has not yet been built, it is logical and prudent to ensure its design reflects changes in the adjoining transport network and adequately caters for active modes.
306. I also disagree with the further submissions of Glenside Progressive Association [FS4.4, FS4.5, and FS4.6] seeking that the intersection of Te Kahu Road and Westchester Drive be built now, ahead of development. **DEV3-APP-R5** states: *‘Prior to the construction of any dwellings in the Glenside West Development Area, an intersection connecting a road from the Development Area to Westchester Drive must be constructed.’* I consider this to be adequate and sufficient to support development within the Development Area.

Summary of Recommendations

307. **HS6-DEV-Rec43**: That **DEV3-APP-R1.5** be amended as set out below and detailed in Appendix A:

The neighbourhood parks ~~required by DEV3-APP-R1.5~~ must be constructed and accessible for public use at the time the 100th dwelling within the relevant neighbourhood park catchment area, shown on the Development Plan maps as catchment areas A to C, is constructed.

308. **HS6-DEV-Rec45:** That **DEV3-APP-R4.3** be amended as set out below and detailed in Appendix A:

The neighbourhood park ~~required by DEV3-APP-R4.a~~ must be constructed and accessible for public use at the time the 50th dwelling within the relevant neighbourhood park catchment area, shown on the Development Plan maps as catchment area D, is constructed.

309. **HS6-DEV-Rec46:** That submission points relating to APP13 are accepted/rejected as detailed in Appendix B.

4.0 Minor and inconsequential amendments

310. Pursuant to Schedule 1, clause 16 (2) of the RMA, a local authority may make an amendment, without using the process in this schedule, to its proposed plan to alter any information, where such an alteration is of minor effect, or may correct any minor errors.
311. The following minor and inconsequential amendments relevant to this report are identified below and proposed to be corrected, as set out in Appendix A.
- a. For consistency with the mandatory direction 26 of the National Planning Standards I recommend a minor correction to the DEV2 chapter name as follows:
Development Area: ~~-~~ Lincolnshire Farm
 - b. As discussed in the report, I recommended deleting all references to the Subdivision Design Guide in **DEV2-P2.4**, **DEV2.P5.1**, **DEV3-P3.4**, and **DEV3.P5.1** given Ms Stevens and my recommendation to delete the Subdivision Design Guide in its entirety.⁶⁶
 - c. The Development Plans and legends refer to “Collector Roads” and “Principal Roads”. Under Waka Kotahi’s One Network classification, and as reflected in the Transport chapter and Road Classification overlay of the PDP, these types of roads should be referred to as “Urban Connectors”. All references to a “Collector Road” or a “Principal Road” in the Development Area chapters, appendices and maps should be amended to “Urban Connector”. The DEV3 Development Plan also refers to “Indicative local road”. In order to align with the Road Classification overlay, this should be changed to “Indicative Local Street”.
312. Given my recommendation in response to Kāinga Ora [391.742]⁶⁷ to delete the FUZ in its entirety and upzone Upper Stebbings and Glenside West to the intended zoning, there will need to be amendments to the PDP maps. My preference is to firstly ensure that the Development Area PDP maps accurately reflect the realistic and feasible development aspirations for Lincolnshire Farm and Upper Stebbings and Glenside West. In his submission Mr Halliday sought minor amendments to the planning maps to amend the Development Areas – primarily to align the Development Plan with what he knew to be realistic from his latest earthworks and engineering plans. I therefore consider there is scope to make amendments to ensure that the PDP be updated with the most accurate and up to date information. The detailed plan of Glenside West

⁶⁶ [ISPP Wrap Up Hearing – Subdivision Design Guide Review Right of Reply](#), Paragraphs 74-75.

⁶⁷ See Hearing Stream 6 Future Urban Zone s42A Report

that Mr Halliday has provided reflects minor amendments based on a detailed assessment of earth working constraints, and preferences to balance cut and fill on site.

313. The second step is to then ensure that the amended underlying zoning aligns with the Development Plans. In my view it is a worthwhile exercise to ensure that the recommended zonings are appropriate and realistic from both the Council and developers perspective. To my mind there is a sufficient evidence base from Councils perspective to support the 'upzoning' as the matter of ensuring development is appropriate to site topography, ecology, gullies, streams, SNA's etc has already been undertaken. If Mr Halliday has undertaken detailed earthworks and engineering assessments for other parts of the development area, I consider it would be advantageous for all parties to ensure the PDP delineates the most accurate development plans. I suggest that this occur in a timeframe as directed by the Panel.
314. Having undertaken the review of provisions in Appendix C it is apparent what the intended underlying zoning of each area should be on the basis of the 'twin' provisions. In my view this makes it clear what rules can be deleted where there is an equivalent provision in the underlying zone chapter. However, one area that is less clear, and where further clause 99(2)(b) amendments may be necessitated, are the provisions that apply to 'All Areas' within the Development Areas. I can appreciate the intent is to allow flexibility for community facilities, educational facilities, sport and recreation, etc to locate within the Development Area. While it is clear that for example, the DEV2 'Land use activities in the General Industrial Activity Area' section of rules reflect the GIZ chapter provisions, the 'Land use activities in all Areas' section of rules seems to bring through rules from the NOSZ, MRZ, and LCZ zone.
315. There would also be a need for consequential amendments to the MRZ and GIZ chapters to ensure that the provisions in the underlying zone chapters take into account the Development Areas i.e. to identify the Lincolnshire Farm Development Area in Height Control Area 1 in GIZ-S1.

5.0 Conclusion

316. This report has provided an assessment of submissions received in relation to the Lincolnshire Farm Development Area, Upper Stebbings and Glenside West Development Area, Appendix 12, and Appendix 13 of the PDP.
317. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix A of this report.
318. For the reasons set out in the Section 32AA evaluation included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
 - a. Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and

- b. Achieve the relevant objectives of the PDP, in respect to the proposed provisions.

5.1 Recommendations

319. It is recommended that:

- c. The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in Appendix B of this report; and
- d. The PDP is amended in accordance with the changes recommended in Appendix A of this report.

6.0 Appendices

Appendix A: Recommended Amendments to the Development Area: Lincolnshire Farm (DEV2) Chapter, Development Area: Upper Stebbings and Glenside West (DEV3) Chapter, APP12 – Lincolnshire Farm Development Area, and APP13 – Upper Stebbings & Glenside West Development Area

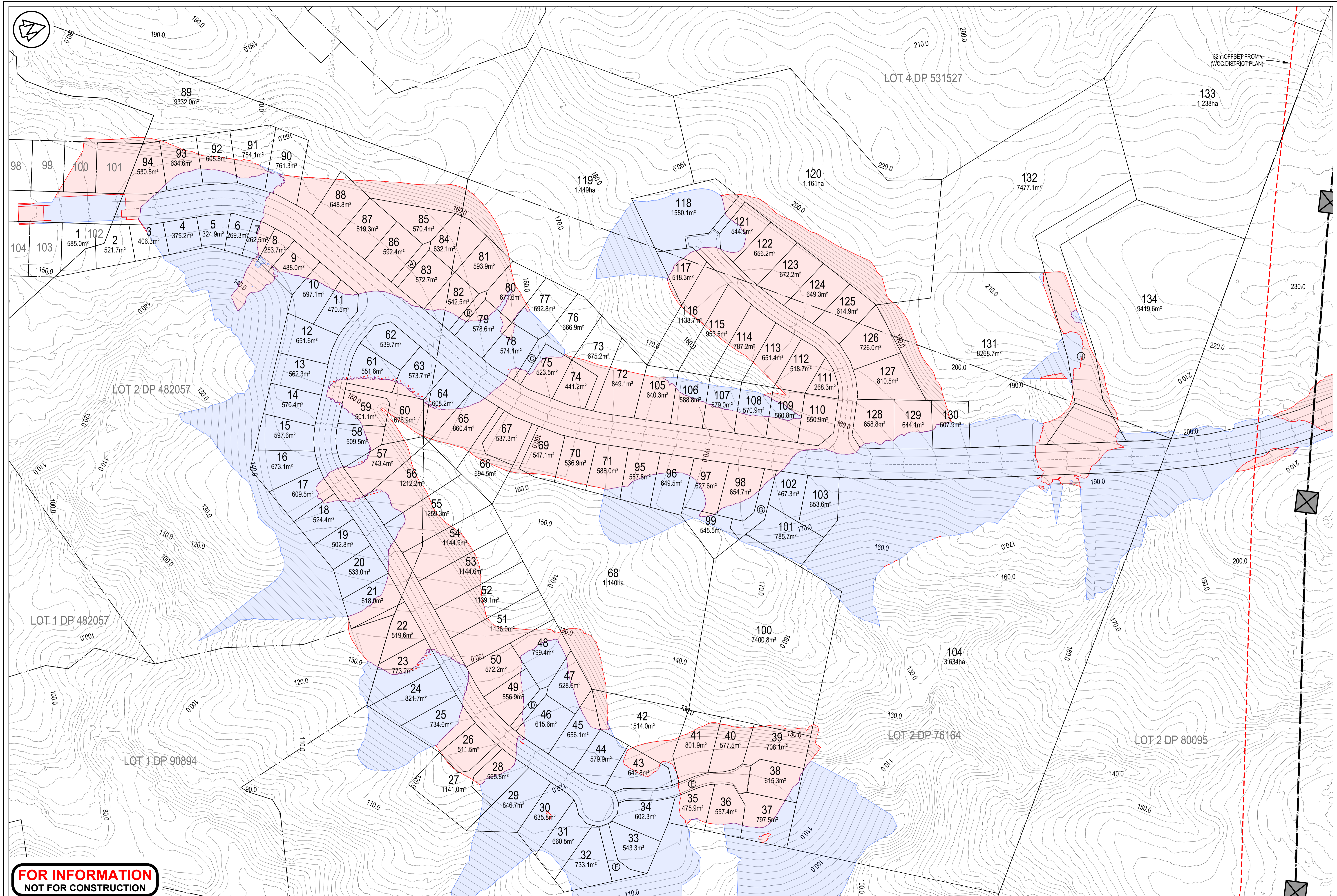
Where I recommend changes in response to submissions, these are shown as follows:

- Text recommended to be added to the PDP is underlined.
- Text recommended to be deleted from the PDP is ~~struck through~~.

Appendix B: Recommended Responses to Submissions and Further Submissions on General Points on Development Areas, Development Area: Lincolnshire Farm (DEV2) Chapter, Development Area: Upper Stebbings and Glenside West (DEV3) Chapter, APP12 – Lincolnshire Farm Development Area, and APP13 – Upper Stebbings & Glenside West Development Area

Appendix C: Comparison Tables of provisions in the Development Area: Lincolnshire Farm (DEV2) Chapter and Development Area: Upper Stebbings and Glenside West (DEV3) Chapter with provisions in the GIZ and MRZ chapters

Appendix D: Recommended amendments to the Lincolnshire Farm and Upper Stebbings and Glenside West Development Area PDP maps



FOR INFORMATION
NOT FOR CONSTRUCTION

No.	Revision	By	Chk	Appd	Date
A	FOR INFORMATION	SD	AB	BK	08.06.20



Original Scale (A1)	1:1000	Surveyed	R.McLEAN	06.20	Approved For Issue*
Reduced Scale (A3)	1:2000	Drawn	R.McLEAN	06.20	Date
		Checked	A.BARBOUR	06.20	Date

Client:	BEST FARM LTD
Project:	MATHER BLOCK

Title:	MASTER PLAN CONCEPT EARTHWORKS
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Discipline:	CIVIL
Drawing No:	3322432-1000-WS-0006
Rev:	A