

HEARING STREAM 8

Speaking Notes – John Tiley

Regarding the PDP provisions for Marshall Ridge I wish to call the Commissioners' attention to two Technical Reports prepared for the Council:

1. Upper Stebbings Valley, Wellington. Phase 1 – July 2018
2. Ridgelines and Hilltops - Initial Review Report - April 2020

Note: Report 1 above does not appear under the “all reports” link on the Hearing Stream 8 web page.

I wish to put to the Commissioners that these reports should be treated as “expert evidence”, provided by the Council, and the reports' approach to the amenity value of ridges should therefore be appropriately reflected in the PDP.

The use of the phrase “ridgelines and hilltops” in the PDP I consider misleading. The Ridges are not recognised as requiring a “whole landform” approach, as these reports emphasise. When considering the value of ridges and the extent of development intrusion, if any, that is to be permitted, the side slopes are inseparable from the ridgetop.

Report 1

The report comments on many Ridges, noting their value as features and backdrops to communities. Marshall Ridge is described (map p32) as:

- *Central feature in Porirua Stream Valley*
- *Open space backdrop to urban areas*

The map colour coding shows the Ridge as having “high visibility within communities”. Section 9 of the report comments on levels of visibility of ridges in the area, referring throughout to **lower, mid, and upper slopes as well as the ridgeline**, seeing these as a single entity making up the landform feature that is a ridge.

Section 10.7 describes Bests Ridge and Marshall Ridge:

*The major ridgelines forming the Site, Bests Ridge and Marshall Ridge, provide a sense of enclosure to the lower lying areas of the site and are highly visible from the suburban areas of Churton Park, Tawa, and State Highway 1. Accordingly, **areas of higher landscape and visual value are the upper mid slopes and ridgetop areas**, which are not only highly visible, but also distinctive landscape features in themselves. These areas currently form a very strong definition between the neighbourhoods of Churton Park and Tawa, and an important backdrop to these communities.*

Report 2

I refer to various quotes which demonstrate that “landform”, not “ridgeline and hilltop” is the essence of a Ridge.

Mapping of the Overlay “drape” was based on district wide and local scale visibility, slope, and landform “continuum”. This means that visual continuity of ridgelines and hilltops landform was considered important, even if all parts of the Overlay did not hold equal visual values. The approach was described as based on visual amenity (as opposed to “visibility” alone) and provided for whole landforms. It sought to avoid a patchwork of ridgeline and hilltop areas with controls relating only to “patchwork” areas.

Boundary is defined by visibility, slope (steepness) and landform continuum (visual continuity).

In urban parts of the district, the Overlay provides containment and “breathing space” between areas of development, to create a coherent landscape framework across the district. This serves to build up a district-scale natural and urban landscape character marked by distinct areas of urban development that is contained and distinguished by the most highly elevated, less developed, surrounding landforms. This character is key to Wellington’s urban landscape identity. (JRT underlining)

.....provides a basis for consideration of effects on a landform “continuum” that provides visual continuity and cohesiveness across the district.

.....retention of the Overlay as a landscape “framework” will provide for continued recognition of values associated with more elevated areas, and effects of development on these; and will recognise the importance of the landform and visual continuity of these elevated, relatively undeveloped landscapes.

Summary

I maintain the PDP does not place amenity value on the city ridgelines in a manner that could reasonably be expected given the expert evidence on such value in Technical Reports commissioned by the Council.

The PDP struggles with language in dealing with ridges, recognising the inadequacy of “ridgeline” as a manageable concept and reverting to “ridgetop” as an alternative. NFL Appendix A page 2, in referring to the Upper Stebbings and Glenside West Development Area, resorts to “Ridgetop Area” which does not appear elsewhere.

To give effect to any substantial measure regarding a ridge, a clear definition of the area being dealt with is essential and must include side slopes to the degree necessary to retain an undeveloped ridge as a valued city or community feature.

Marshall Ridge

The Development Area Chapter provides an opportunity to assess Marshall Ridge differently from other ridges (perhaps not unlike the way REG is addressed), excluding the wider provisions of the NFL chapter. The ridge has limited length and will be

surrounded by residential development, meaning it has no attraction for wind farm development. Wellington Water has a reservoir carefully inserted into an upper slope and will need access for maintenance. That apart, I suggest there is no need for intrusion on the slopes which are currently undeveloped.

The need for separate consideration is illustrated by reference to the Section 42A Report NFL, para 94, which states there is protection under the Development Area Chapter. In that chapter the sole reference to the Ridge is in DEV3-R33, stating construction of buildings and structures in the ridgetop has non-complying status. That leaves open the possibility of “buildings” on the ridgetop, inappropriate given the setting of Marshall Ridge. To find the Council using the word “protection” is notable. Whether DEV3-33 comprises “protection” is open to question; within the PDP “protection” is conspicuous by its absence.

Part 3 Area Specific Matters Upper Stebbings and Glenside West. The introduction includes a paragraph beginning “*The Development Plan is divided into ‘build’ and ‘no build areas’ due to the topography of the area*” (see Footnote). Rather than seeking balance regarding undeveloped areas, the paragraph creates an expectation for a license to develop. Residential buildings are not anticipated in no-build areas. A moderate scale of (facilitating) earthworks are anticipated in no-build areas. Whose anticipation? No provision is made should the stated anticipations prove groundless and permission for buildings and significant earthworks is requested. It is easy to foresee any significant earthworks in no-build areas intruding onto an ill-defined ridgetop area.

Conclusion

I contend Marshall Ridge should have a status separate from that of other ridges and accordingly needs protection under the Development Area chapter with provisions of the NFL chapter being inapplicable.

In relation to development in a ridgetop area, a clear definition of the area including side slopes is essential to allow the provisions of the PDP to have effect without doubt.

I request that the PDP be amended to give full effect to the two preceding points.

Footnote: [The Development Plan is divided into ‘build’ and ‘no build areas’ due to the topography of the area. The build areas are intended as the areas where [buildings](#) will be located. This will be predominantly residential [buildings](#) with the potential for a [community facility](#) should one be found necessary in the future. The no build areas are intended to contain a mix of natural open space and the balance of residential lots. [Land](#) located under existing transmission lines is also in ‘no build’ areas and part of the open space network. While no residential [buildings](#) are anticipated in the no build areas, 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. A moderate scale of [earthworks](#) are anticipated to enable development in the build areas.]