

# WELLINGTON CITY DISTRICT PLAN – DPC77

## Submission form on publicly notified Proposed District Plan Change 77

### Curtis Street Business Area

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

#### SUBMISSIONS CAN BE

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

#### YOUR NAME AND CONTACT DETAILS

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#### TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

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

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

1. Background, site description and scope of plan change
2. Key resource management issue
3. High-order resource management considerations
4. Site specific resource management issues
5. Section 32 considerations
6. Definitions of activities
7. Purpose and piecemeal planning provisions
8. Objectives and policies
9. Rules and standards

## MY SUBMISSION IS THAT

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

### 1. Background, site description and scope of Plan Change

- a. The Section 32 Report omits that the landowner sought the rezoning of this site to "Suburban Centre" in DPC73 and Council officers determined that the site was not appropriate for "Suburban Centre", "Centre" or "Business 1" zoning and proposed rezoning the site to "Business 2" use. What is now proposed is very much more like a suburban centre than a "Business 2" use zone.
- b. It is not clear that the proposed zoning accurately describes 55-85 Curtis Street. 55 Curtis Street appears to be Part Lot 2 on DP1746. Rezoning of 55-85 Curtis Street would not include Part Lot 1 on DP1746 – the section immediately adjacent to the intersection of Old Karori Road and Curtis Street.

### 2. Key resource management issue – rationalisation of zoning

- a. The S32 Report refers to the legitimate expectation on the part of the landowner that the site can be developed. This legitimate expectation can only be based on the activities for which the site is zoned. The site was zoned for Outer Residential and Open Space B use when the landowner acquired it. These zoning decisions should be assumed to reflect a considered decision on the activities appropriate for this site. The price the landowner paid for the site will have been based on the limitations imposed by the zoning. If the landowner had a speculative expectation of substantial capital gains from a change of zoning, this was at his own risk.
- b. It is unclear why the decision of the previous landowner (a supermarket operator) not to become a speculative residential property developer on this site is interpreted as indicative of an unsuitability of the site for residential use. The site was one of the earliest within the valley settled by colonists to Wellington and contained residential dwellings for decades. The location and alignment of the site for shading is not significantly different from the rest of the valley immediately south of Old Karori Road, which contains a number of established residences.

### 3. High-order resource management considerations

- a. The S32 Report quotes the purpose of the RMA as "managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while:
  - (a) sustaining the potential of natural and physical resources ...; and
  - (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
  - (c) avoiding, remedying and mitigating any adverse effects of activities on the environment."
- b. This sustainable management appears to be interpreted entirely in economic terms, however, with development of the site being implied to have a direct correlation with the well-being of people and communities. It is not explained how the loss of open space would contribute to the social well-being of the community in Northland, Wilton or Karori.
- c. At 6.2 the S32 Report lists the key directions of the District Plan and asserts that DPC77 is "firmly founded on the District Plan policy direction of sustaining Wellington's economy, setting, character and compact urban form." It is not explained how DPC77 contributes to "Maintaining and enhancing important open space, natural features and habitats" or to "Maintaining and enhancing amenity values" or to "Maintaining and enhancing unique character" or to "Avoiding and mitigating the impacts of hazards" or to "Improving standards of accessibility within the city".
- d. At 6.4 the S32 Report lists relevant other documents. The list does not include Wellington's Outer Green Belt Management Plan May 2004, which specifically marks the site on two maps for future initiatives to enhance the ecological corridor of open and green spaces along the valley of the Kaiwharawhara Stream by including the site in Council controlled open space. The list also does not include the Biodiversity Action Plan 2007 which specifically refers to adverse "impacts on biodiversity by creating less green open space and more impervious surfaces" and to action to protect and maintain the Kaiwharawhara Stream, which passes under the site in a culvert and receives stormwater from the catchment that includes the site.

#### 4. Site-specific resource management issues

- a. At 7.2 the S32 Report notes that the site is contiguous with land of regionally significant ecological value and that vegetation on the site protects some of these ecological values. Nevertheless the proposed objectives and policies are not described as “ensuring” retention of trees and vegetation, and the rules and standards address only mitigation, with no reference to avoiding or remedying removal of trees and vegetation. These deficiencies indicate a failure to provide measures to protect and maintain the ecological values in the wider area.
- b. At 7.5 the S32 Report refers to a heritage assessment by the Council’s heritage team that appears to have addressed only the location of the historic footbridge over the Kaiwharawhara Stream near the site. The heritage assessment does not address the fact that parts of the site appear to have been occupied prior to 1885 and significant occupation seems to have occurred in the late nineteenth and early twentieth centuries. A photograph of the site in the Turnbull Library taken between 1921 and 1928 shows extensive and established occupation with very little difference in the ground level at the most southern part of the site from what is present now. This suggests that the assumptions within the heritage assessment are invalid. The lack of any requirement for a heritage assessment prior to undertaking earthworks leaves the site without effective regulatory protection.
- c. At 7.6 the S32 Report lists the notable findings of the economic assessment as being that there has been no recent growth outside of the CBD, Karori “as a Centre” lacks business space and the retail spend of Karori is not confined to that suburb. This suggests that the provision of additional commercially zoned land at some remove from Karori Centre is essentially speculative. The need for additional business space at Karori town centre is not addressed by this proposal. There is no suggestion that the existing pattern of commercial activity in the present distribution of neighbourhood centres, town centre and CBD is inefficient or unsustainable, whereas it is implied that the proposed new Business Area could be significantly disruptive of the present centres, with short-term tenancies vacating the new business area to better locations as they became available. The economic assessment is explicit in saying this site is inferior for retail and commercial use to the existing centres for such activity, established on existing public transport routes. It is not explained how an increase in vacant retail or commercial premises, predicted to be a likely result of the proposal, is a more efficient or sustainable use of resources.
- d. At 7.7 the S32 Report refers to the transport assessment and reports that this identified some constraints on business activities from the effect of additional traffic on the safe and efficient operation of the Curtis Street/Chaytor Street intersection, the potential for on-street parking to disrupt traffic and cause a safety hazard, and the need to manage servicing the site by articulated vehicles.
- e. The transport assessment report itself indicates that only four intersections were considered for the assessment. The effect on streets or roads in Northland was not assessed, although potential adverse effects on two streets (Creswick Terrace and Randwick Road) were identified. The effect on Paisley Terrace, Seaforth Terrace or Rosehaugh Avenue were not assessed, nor on Karori Road and the streets accessed from it between the intersection with Chaytor Street and Marsden Village.
- f. The transport assessment identified that the vehicles most likely to be used to service commercial activities on the site cannot safely negotiate the intersections with Curtis Street at Old Karori Road and Whitehead Road at present, but that access to the site from either of these streets would be preferable to access to the site directly from Curtis Street. Although classed as a primary arterial by the Council, Curtis Street is 1.0m narrower than Whitehead Road and 2.5m narrower than Chaytor Street, and access to the site from Curtis Street could cause increased road safety risk.
- g. The transport assessment also noted that the site is poorly served by public transport. Only a limited service passes the site and there is no suitable place on either side of Curtis Street near the site for buses to stop safely. The present service passing the site stops 550m from the site.
- h. The S32 Report does not address these matters, but describes a “requirement for all vehicle servicing areas and car parking to be accommodated on the site” as a specific solution. The numerous safety concerns within the transport assessment are more than minor, but have not been properly resolved. The suitability of the site for the nature and scale of the activities being considered is called into question by the transport assessment.

- i. At 7.9 the S32 Report refers to a noise assessment undertaken by Council's environmental noise team. This assessment found that some properties would be directly affected by noise from the site, but concluded that there was no amphitheatre effect, because such an effect requires hard reflective surfaces. The purpose of this assessment was to assess the effect of the proposal, which is for "a range of commercial activities" to be undertaken within buildings able to be constructed with earthworks, retaining structures and car parking provided for that purpose, all of which might contribute acoustically reflective surfaces and replace acoustically absorbent vegetation on the site, whereas the assessment undertaken was of the current undeveloped condition of the site. The assessment of potential noise effects was not fit for purpose for a S32 Report.
- j. Before this site was vacated by the Council, prior to disposal in 1998, it possessed extensive areas of acoustically reflective walls and pavements, and the amphitheatre effect, where noise from activity within the site was clearly audible beyond the ridgeline and over 500m distant was frequently noticed.
- k. At 7.10 the S32 Report refers to correspondence between the Council and Transpower regarding the NPSET and the red and orange zones of Transpower's Corridor Management Policy (which are shown clearly on Figure 1 of the Landscape Report prepared by Drakeford Williams). The CMP appears to be misrepresented significantly in two ways: the nature of the "buffer corridor" and the area it affects.
- l. Transpower's published position is: *"It is Transpower's policy to protect the red zone from any development. It is best practice not to build within the transmission corridor. By setting development back from the lines, Transpower's rights to access the lines are provided for, safety risks are minimised and amenity outcomes are promoted."* Transpower's concerns regarding the transmission corridor are not accurately reported by the S32 Report. The Council has introduced a focus on "sensitive activities" that is entirely absent from the published rationale for the policy, which is to keep a corridor clear of buildings to have access to the lines for safe operation and maintenance.
- m. Similarly, Transpower is reported to support *"the rezoning of this site from residential to business land."* The report omits Transpower's position regarding rezoning the "Open Space" area, which would appear to be an appropriate land use zoning beneath transmission lines. In saying Transpower's support for rezoning is because the NPSET Policy 11 *"does not support sensitive activities within the identified buffer corridor"* the S32 Report appears to suggest that the entire site lies within the buffer corridor. Of the site's approximately 10,900m<sup>2</sup> area, approximately 1,500m<sup>2</sup> lies within the "red zone" within the "Open Space" area and approximately 2,600m<sup>2</sup> lies within the "red zone" within the "Outer Residential" area. It should be only the latter area that is affected by consideration of "sensitive activities", rather than the whole site.

## 5. Section 32 considerations

- a. At 9.1.1 the S32 Report speculates that the reason the "Outer Residential" area of the site was not developed for this use during the 2003-08 housing boom was the amenity constraints, being low ground level, shading and the overhead high voltage transmission lines. As these same features apply to nearby sections that are occupied by residences, including relatively recent structures and a child care centre still under construction, an equally valid reason might be that the landowner during the housing boom was not a residential property developer and had no interest in becoming one.
- b. At 9.1.2 the S32 Report notes that *Capital Coast Health Ltd vs Wellington City Council* provides useful guidance on any desire to rezone the "Outer Residential" part of the site to "Open Space B", but omits to note that this is not applicable to the situation where land already zoned as "Open Space" was knowingly purchased by the landowner and has been maintained regularly by the Council as public open space since purchase. Council contractors mow the grass on the north-eastern part of the "Open Space" zone and have done so regularly since the site was sold by the council in 1998. Council contractors also removed pine trees establishing within this zone only a two or three years ago.
- c. The S32 analysis recognises that the "Open Space" zoning provides for recreation, community use and contributing to values of residential character and landscape values. Against these benefits, the analysis asserts that there is no identified demand for additional open space in the area, it is not the most efficient use of the land and it does not allow the landowner to provide for his social, economic or cultural needs. This assertion is contrary to statements within the Council's own published plans, which clearly show a demand to increase the

- d. Wellington's Outer Green Belt Management Plan May 2004 specifically marks the site on two maps for future initiatives to enhance the ecological corridor of open and green spaces along the valley of the Kaiwharawhara Stream by including the site in Council controlled open space. The Biodiversity Action Plan 2007 specifically refers to adverse "impacts on biodiversity by creating less green open space and more impervious surfaces" and promotes action to protect and maintain the Kaiwharawhara Stream.
- e. "Open Space" zoning avoids adverse effects on the environment, safeguards the life-supporting capacity of the ecosystems within the valley and sustains the potential of natural and physical resources while managing the use and protection of natural and physical resources in a way which enables local people and communities within the wider area to provide for their social, economic and cultural well-being, health and safety. The conclusion that this is not the most appropriate or efficient use of the land appears questionable. For the landowner, the position is one of *caveat emptor*; the purchase of land zoned "Open Space" with an intention to seek to achieve a substantial speculative gain by rezoning it for business use carried the normal risk of commercial failure.
- f. At 9.1.3 the S32 Report lists the reasons for not keeping the status quo as including difficulties in District Plan application from having two zones on one property. The site is not one property, but comprises seven separate certificates of title. Only Section 2 on Survey Office Plan 37014 would be affected by this difficulty and, as the zone boundary follows the nominal boundary between 71 and 73 Curtis Street, the difficulty would be a less than minor.
- g. At 9.1.4 the S32 Report identifies that creating a special Curtis Street Business Area zone would create additional complexity in the District Plan, impact on surrounding residential properties and impact on identified centres. The scale and nature of these impacts are not properly described. The impacts on open space, natural features and habitats, landscape and ecological values, residential character and amenity are omitted from this analysis. These omissions significantly diminish the credibility of this analysis as a valid consideration of alternatives, benefits and costs for what is being proposed.
- h. Similarly omitted, without explanation, is any assessment of the potential benefits, disadvantages, costs and risks for zoning the site for "Centre", "Business 1" or "Business 2" activities. As these activity zones were developed as a result of an extensive and thorough review of "Suburban Centres" rules within the District Plan and reflect a considered response by the Council to providing for commercial activities in suburban areas, this is a curious omission. This is particularly so as discussion of the potential zoning of the site has previously been in terms of a preference for "Centre" zoning on the part of the landowner and a conclusion by Council officers that "Centre" or "Business 1" zoning was not appropriate for this site.

## 6. Definitions of activities

- a. "Temporary activities" are permitted activities under 36.1(g). The scale, nature and duration of "temporary activities" permitted on the site are not defined.
- b. "Sensitive activities" previously identified in the S32 Report as being sensitive only within the context of the "buffer corridor" beneath the high voltage transmission lines are defined as sensitive for the whole site. This definition effectively extends the Transpower "red zone" for sensitive activities from only 12m either side of a centre line beneath the transmission lines to include the 20m wide "orange zone" on each side of the "red zone".

## 7. Purpose and piecemeal planning provisions

- a. The proposed plan change is to provide for increased commercial activity in the western suburbs. The provision for commercial activity in all suburbs was the specific consideration of Proposed Plan Change 73. DPC77 appears to be an attempt to propose a specific zoning change that was considered and rejected by DPC73. The range of commercial and limited retail activities under consideration in the proposal are not dissimilar from the activities of a "Suburban Centre" and the landowner sought, and the Council, rejected such a zoning for the site. It seems poor planning practice to seek to progress a matter considered by one proposed plan change in a new proposed plan change while the prior proposal remains before the courts.
- b. DPC77 introduces new rules for commercial activities specific to this site. DPC73 provides for new suburban

- c. DPC77 introduces piecemeal urban planning and local exceptions and added complexity, rather than a consistent and comprehensive set of objectives, policies and rules.

## 8. Objectives and Policies

- a. 35.2.1 suggests a causal relationship between commercial activity in the Curtis Street Business Area and the social needs of the western suburbs and wider city that has not been established. Furthermore, although “commercial activity” for the purposes of the proposal has been defined as excluding retail activity, retail activities appear to be contemplated.
- b. 35.2.2 refers to promoting an urban environment without reference to the suburban, residential and open space character of this site.
- c. 35.2.3.1 implies the consenting authority will “design” buildings and structures, whereas it is responsible for ensuring the design of buildings, structures and spaces will respect the integrity of the wider landscape and setting, which should include ensuring that reflective and brightly coloured materials are not used.
- d. 35.2.3.3 does not provide the level of protection indicated within the S32 Report for the trees and vegetation along the western boundary. The minimum protection would be to ensure the retention of these with specific reference to protection of the flora and fauna of the ecologically significant seepage wetlands adjacent to the site.
- e. 35.2.3.7 does not provide the level of protection indicated in the S32 Report for Kaiwharawhara Stream. The minimum protection would be to ensure the use of permeable surfaces and control the total permissible area of impermeable surface.
- f. 35.2.4.4 imposes a higher trigger for adverse effects from traffic on local residential streets by referring to “significant adverse effects” rather than to “less than minor” adverse effects. The minimum protection would be to ensure that traffic generated by development of the site imposes less than minor adverse effects on local residential streets.
- g. 35.2.5.2 refers to conditions that do not apply to the site in question. Multiple transport modes are not available. This site is described in the Transport Assessment as a “drive-to” site. This policy identifies the specific and significant deficiencies of this site for the activities being proposed.
- h. 35.2.5.5 refers to “appropriate servicing and site access”. This gives no guidance on the assessment criteria for appropriate site access. The minimum protection would be to ensure the provision of site access that creates no increased road safety risk.
- i. 35.2.5.6 refers to the scale, intensity and placement of signs, as does 35.2.4.5, but the two policies require signs to be managed to two different and potentially contradictory sets of criteria, without indicating which should prevail. 35.2.4.5 should establish the context within which 35.2.5.6 is applied.
- j. 35.2.6.1 refers only to managing adverse effects from noise, lighting, dust and discharge of contaminants on other activities within the site. The minimum protection should be to ensure activities are managed to avoid, remedy or mitigate adverse effects from noise, lighting, dust or discharge whether within the site or on the wider landscape and environment.
- k. 35.2.6.2 refers to discouraging sensitive activities, which are defined to include transport corridors to emergency services and facilities critical to emergency response and utility lifelines. Within the context of the site-specific commercial activity on the site, provision of such corridors and facilities would be necessary to provide a safe working environment.
- l. 35.2.7 does not require any proposed subdivision to be consistent with an already approved, notified concept

- m. 35.2.8 includes specific reference to tino rangitiratanga and kaitiakitanga in relation to this site, rather than within the wider provisions of the District Plan, but no specific iwi or Maori association with this site has been identified.

## 9. Rules and Standards

- a. 36.1(b), (g) and (i) respectively permit car parking, temporary activities and vegetation removal with no clear indication of the maximum permissible limits for these activities, or how the permitted activities relate to the Objectives and Policies that specifically refer to impermeable surfaces, temporary activities and retention of trees and vegetation. Nor is it clear how 36.1(e) permitting retail activities relates to the Objectives and Policies described in 35.2.1 and 35.2.5 that appear to favour non-retail activities on the site.
- b. 36.2 limits Council's control in assessing concept plans to the layout of buildings, car parking areas, vehicle access ways and servicing areas, and landscaping. This excludes the design and external appearance of buildings and structures, including colour, reflectivity and brightness of materials, any consideration of size or location of signage, consideration of traffic, on-street parking or road safety effects, consideration of environmental hazards, consideration of the ability of the transmission line owner to operate, maintain and operate the transmission network, or consideration of the effect on the vitality of, and existing investment in infrastructure in, other "Centres". In addition to limiting the control of Council to give effect to many of its Objectives and Policies for the site in this way, 36.2 also excludes notification of concept plans. By so excluding early input by the community and by residents likely to be directly effected by development based on the concept plans the Council is acting against recognised best practice for sustainable resource management.
- c. 36.3 provides no signal on maximum gross floor areas for retail activities exceeding 500m<sup>2</sup> or commercial activities or integrated retail activities exceeding 2,500m<sup>2</sup> or supermarkets exceeding 1,500m<sup>2</sup> at which the scale and intensity of the proposed development is unacceptable. It is unclear why Council's discretion will be restricted to potential impacts on the vitality and economic viability of Centres Areas for supermarkets exceeding 1,500m<sup>2</sup> or integrated retail activities exceeding 2,500m<sup>2</sup>, but not for retail activities exceeding 500m<sup>2</sup> or commercial activities exceeding 2,500m<sup>2</sup>, or why traffic generation, circulation and safety, car parking and servicing provisions, and pedestrian access and safety would not be considered for integrated retail activities exceeding 2,500m<sup>2</sup> or supermarkets exceeding 1,500m<sup>2</sup>. Council's discretion should include both sets of criteria for each activity. It is also unclear why no mention is made of the present encumbrance on the title certificates preventing use of the site for a supermarket.
- d. 36.6 provides activities standards that appear to have trigger values that differ from those indicated for restricted discretionary activities at 36.3:
  - a. 36.6 (a)(i) and 36.6(b)(ii) set a maximum gross floor area for any building of 500m<sup>2</sup>.
  - b. 36.6(b)(i) sets a height limit of 114m above mean sea level, which provides absolute guidance, but unnecessarily adds "or 6m above ground level, whichever is the higher."
  - c. 36.6(e) fails to provide specific assessment criteria for any effect of earthworks on adjacent watercourses, which fails to meet Policy 35.2.3.6 and limits the regulatory protection it provides, and requires no assessment of the soil for contaminants in site-specific standards for a site with known contamination.
  - d. 36.6(f) implies a trigger of 700m<sup>2</sup> or 35 car parks for car parking that is not indicated in 36.1 or 36.3.
  - e. 36.6(g) does not address the site-specific requirements of the regionally significant flora and fauna immediately adjacent to the site in providing for minimal light intrusion onto the seepage wetlands beyond the western boundary.
  - f. 36.6(m) does not provide assessment criteria for permeable surfaces or run-off from impermeable surfaces to meet Policy 35.2.3.7.
  - g. 36.6(m)(vi) fails to provide site-specific rules to address the issues identified in the Transport Assessment for the site, specifically that activities on the site would be most likely to be serviced by semi-articulated vehicles, rather than medium rigid trucks.
  - h. 36.6(m)(x) fails to provide site-specific rules to address the issues identified in the Transport Assessment for the site, specifically that safe vehicular access to the site cannot be provided from the adjacent arterial street and should be only from Old Karori Road or Whitehead Road.

- i. 36.6(n) fails to provide a standard for noise that meets Objective 35.2.3 and Objective 35.2.4 or Policy 35.2.4.3 to ensure that activities creating noise are managed to avoid, remedy or mitigate adverse effects on nearby residential areas.
- e. 36.7 fails to require a comprehensive concept plan for development of the whole site and so allows for incremental development potentially able to achieve an unco-ordinated development with a gross floor area of buildings on the site significantly greater than 500m<sup>2</sup> without being subject to proper control.

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

1. Reject proposed District Plan Change 77 providing for increased commercial activity in the western suburbs until any need for such provision not already provided by DPC73 has been demonstrated.
2. Retain the existing zoning of the site or alternatively amend DPC77 to give full effect to Council's existing plan for this valley such that the site is zoned and managed to be within Council controlled open space to enhance the ecological corridor as indicated in "future initiatives" of the Wellington Outer Green Belt Management Plan, May 2004.
3. If DPC77 is not rejected, undertake a full and proper Section 32 analysis of the economic, traffic, residential amenity (including noise and light), site contamination and ecological effects of the proposed zoning, and provide a properly qualified expert heritage assessment of the site; and
4. Amend the objectives, policies and rules (including notification provisions and assessment matters) to better avoid, remedy or mitigate the potential adverse economic, traffic, residential amenity, site contamination, ecological and heritage effects of commercial development on the site.
5. Without limiting the above general relief, make the following specific changes to DPC77:
  - a. Remove from the area proposed to be rezoned the Open Space B zoned area (marked by the red boundary on the map of the proposed rezoning); and
  - b. Provide specific rules to control the permissible development on the site to protect and maintain the existing vegetation on the western and eastern boundaries; and
  - c. Provide specific rules to control the permissible development on the site to protect and maintain a clear corridor beneath the high voltage transmission lines; and
  - d. Provide specific rules to control the permissible development on the site to avoid any increase in volume, velocity, contaminant load or temperature of stormwater entering Kaiwharawhara Stream from the site; and
  - e. Provide clear direction in the objectives, policies and rules as to the scale and intensity of development considered appropriate on this site; and
  - f. Provide specific rules to control the permissible development on the site to avoid more than minor adverse effects on the residential amenity, landscape character and ecological values within the wider landscape from activities within the site.
6. Amend DPC77 to incorporate (a) the specific relief sought above and/or (b) amendments which support the alternative approach to managing the site as Council controlled open space to enhance the ecological corridor as indicated in "future initiatives" of the Wellington Outer Green Belt Management Plan May 2004 and/or (c) any consequential and/or additional amendments that are necessary to address the concerns raised above and give full effect to the intent of this submission.

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

I wish to speak at the hearing in support of my submissions.

**JOINT SUBMISSIONS**

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

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

Yes, I have attached: a map of the scope of the plan change showing limit of 55-85 Curtis Street.

**SIGNATURE OF SUBMITTER**

*(or person authorised to sign on behalf of submitter)*

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

Signature F.F. Knight & W.D. Newman

Date 11 March 2013

