

NRA's Submission to Proposed District Plan Change 15

4.) Our submission is to oppose Proposed District Plan Change 15 (to zone two parcels of land at the Poto Road corner, Normandale, as *General Residential Activity Area* in the City of Lower Hutt District Plan). The reasons are given below.

4a.) Historical

4ai.) Heritage value

The land to be zoned, hereafter referred to as the Poto Road corner, is of historical significance to Normandale and Lower Hutt City. It was acquired by the Crown in July 1903 for the “*Normandale Settlement*”, was “*permanently reserved for a public school in 1906*”¹, and is part of the original site of old Normandale School which opened there in 1911.

It is argued that the Poto Road corner meets the *heritage* criteria as outlined in Hutt City Council’s *Reserve Land Acquisition/Disposal Policy and Guidelines* (2003). The original school building still exists on the 1911 school site and has been occupied by Normandale Playcentre since 1957. The land at the Poto Road corner is intrinsically and extrinsically connected to the almost 100-year old school site and is very much part of the historic landscape of Normandale.

4aii.) Almost half a century of community expectation for a reserve

After old Normandale school closed in 1937, due to a falling roll, the school building and its ground were used and maintained by the local community. By the 1960s, there was once again a demand for a new local school.

The old school site was deemed too small and discussions were had between Lower Hutt City Council and the Wellington Education Board to exchange land at the old school site (at Poto Road) with land at the new school site (at Martin Grove which was also a reserve at the time), with the understanding that Lower Hutt City Council would “*acquire the [old] school site for community purposes... as part of the deal in connection with the new school site*” (City Engineer, Lower Hutt City Council, 3 September 1976).

According to documents held at Hutt City Council Archives², “*the exchange proposal was initiated by the local community in 1961, supported by this Council and subsequently approved in principle by the Crown*” (R. H. Deal, Town Clerk/Chief Executive, Lower Hutt City Council, 10 July 1985).

These documents show that since 1961, there has been long-standing anticipation by the community that land at the old school site would be retained for community recreational purposes (refer to Appendices A and B). Moreover, since 1961, repeated requests have been made by the community for land at the school site to be maintained and beautified- neither of which has happened for almost half a century.

¹ Chin, L., & Clareburt, J. (2008). Preliminary Section 40 Report: Poto Road, Sites 1 and 2. Wellington: The Property Group.

² Refer to files: Arch 15524, Arch 53937, Arch 53938, Arch 55367, and Arch 71209 in the Town Clerk and Chief Executive Filing System held at Hutt City Council Archives.

The fact that part of the old school site (Poto Road corner) was bought by Lower Hutt City Council in 1983, does not detract from the fact that, historically, the land in question is part of the old school site; that the *original intention* for that land was for it to be used as a recreational reserve for the community (to replace the reserve the community lost at Martin Grove when the new Normandale School was built); and that there was a *common understanding*, between the community and the Lower Hutt City Council until recently as 1985, that the land would be used for community purposes.

4b.) Present day

4bi.) Community wants a reserve

In a community survey conducted by the Normandale Residents' Association (NRA) in November 2009, when residents were presented with the option of retaining the Poto Road corner as a reserve, or to have houses built on the land, the *most preferred* option chosen by 92% of residents (71 out of 77 respondents) was for the land to be kept as a reserve³.

As result of this feedback, the NRA launched a Save the Poto Road Reserve Campaign late last year, which included a petition opposing Hutt City Council's plans for the Poto Road corner. Attached to this submission are the signatures of **644** members of the local and wider community who oppose the disposal of the Poto Road corner and the 7-lot development plan; and ask that the Poto Road corner be classified as a recreation reserve (refer to Appendix E).

It should also be noted that in Council's consultation with the community in 2008, regarding the disposal of Poto Road corner, 10 out of 11 submissions received were opposed to the disposal⁴. Since then, the 7-lot development plan was adopted by Council on 6 May 2009 without further consultation with the community.

4bii.) Community needs a reserve

According to the 2006 Census, the Normandale suburb has a population of 2,085 persons in 753 occupied dwellings, and is a family orientated suburb whereby couples with children make up 47.2% of all families (cf. 42.4% Wellington Region)⁵. Moreover, 19.9% of its population is aged under 15 years. According to consultants Parks and Open Spaces Ltd (PAOS), this overrepresentation of families with young children in the suburb is "*significant when assessing reserve provision in the suburb, particularly open space for formal and informal recreation*" and that "*in the future... growth in the number of families living in Normandale... could provide further demand for playground or kick-a-ball spaces*" (PAOS, 2009)⁶.

However, despite these changes in the demographic composition of the community, the resources available to meet these needs have remained unchanged for many decades. For example, in 1985, the Director of Parks and Recreation, of Lower Hutt

³ Cleland, A. (2009, December). Community chooses reserve over housing. Normandale Times, p. 1-2.

⁴ Hutt City Council (2008). Western Ward Land Review: Report on Submissions, 20.6.08. Lower Hutt: Author.

⁵ <http://www.stats.govt.nz/Census/2006CensusHomePage/QuickStats/AboutAPlace/SnapShot.aspx?id=3569301&type=au&ParentID=1000009&expand=2000046&scrollLeft=0&scrollTop=663&ss=y>

⁶ PAOS Ltd. (2009). Proposed plan change Poto Road, Normandale: Assessment of open space and visual amenity. Wellington: Author.

City Council, stated that there was a “*shortage of such open space areas for children to play in this part of Normandale...*” and that a “*park developed on this site would be a valuable facility for residents of upper Normandale*” (E. F. Butcher, Director of Parks and Recreation, Lower Hutt City Council, 9 August 1985). There were even plans to name this proposed park “*Centenary Park*”⁷. Sadly, however, none of this ever eventuated.

The possibility of developing Poto Road corner into a playground was again raised by Council officers during the Western Ward Land Review process in 2008⁸. The rationale given by Hutt City Council for not developing the area into a playground was due to “*current population densities and the locations of other playgrounds in the Western Hills*”⁹. However, the validity of this reasoning can be questioned as playgrounds in the Lower Hutt City were last reviewed by Council approximately 18 years ago in 1992¹⁰.

There also appears to be the perception by Hutt City Council that the community is well-resourced in terms of recreational facilities/opportunities for its members. In a summary of the “*recreation opportunities in and around Normandale*”, PAOS (2009) listed the following sites: the remainder of the old school site (which is now a Department of Conservation Recreation Reserve); Draper Reserve; the playing field below Martin Grove; the playground on Pekanga Road; Jubilee Park; Belmont Regional Park; and the playground in Banksia Grove (which is in Maungaraki).

The limitation of most of these sites is that they are either unsuitable or inaccessible to parents with young children and those who are physically infirm in the community. For example, parts of Draper Reserve, Jubilee Park, and Belmont Regional Park are not wheel-chair and stroller friendly. The playground at Pekanga Road is not accessible as there are no provisions for car-parking. Moreover, while there may be a playground at Banksia Grove, this is located in Maungaraki and is not a safe “*kick-a-ball*” space, as stated in PAOS (2009), because it is perched on a steep, unfenced cliff. The playing field at Martin Grove, while providing a “*kick-a-ball*” space has no playground. This leaves the old school site at Poto Road as the only area that has the potential to meet the community’s growing recreational needs.

In fact, part of the old school site (i.e., the Department Conservation land adjacent to the Poto Road corner) was identified by PAOS (2009) as being an “*appropriate space for an adventure playground*”. The only limitation with this though is that the use of the DoC-owned reserve alone would not result in a “*reasonably useable reserve*” (Tonkin & Taylor, 2009¹¹), but that a “*useable reserve*” could be achieved by re-integrating land at the Poto Road corner with the adjacent DoC-owned land, as per the original school site in 1911.

⁷ Refer to file: Arch 15524 in the Town Clerk and Chief Executive Filing System held at Hutt City Council Archives.

⁸ Hutt City Council (2008). Strategy and Policy Committee of Hutt City Council Tuesday 22 April 2008 at 5.30pm. Lower Hutt: Author.

⁹ Hutt City Council (2008). Western Ward Land Review: Report on Submissions, 20.6.08. Lower Hutt: Author.

¹⁰ Hutt City Council (2003). Hutt City Council Reserves: Strategic Directions. Lower Hutt: Author.

¹¹ Tonkin & Taylor (2009, March). Hutt City Council: Urban Development and Planning Assessments: Poto Road, Normandale. Wellington: Tonkin & Taylor Ltd.

Moreover, the perception that the community is well-resourced in recreational opportunities can be further challenged by statistics on the distribution of parks and reserves on the Western Hills. It should be noted that according to Hutt City Council's Parks and Reserves Network, the Western Hills is the only landscape identity area without any active recreation for its residents, and has the least amount of conservation reserve area (cf. the Hutt Valley, Wainuiomata, and Harbour identity areas)¹².

4c.) Impact of peri-urban and piecemeal development on communities

4ci.) Key aspects of the Western Hills

The Western Hill suburbs, such as Normandale, form a peri-urban environment that melds the more conventional suburbs and urban landscape of the valley floor into the rural landscape of Belmont Regional Park. These suburbs, where development has been gradual over an extended period of years, retain an environment that is visually dominated by vegetation. Much of this vegetated area also provides the basis for a network of walking tracks, some officially maintained by HCC, many developed and maintained by local residents. Whilst some of this land is owned by HCC, much of the vegetation is retained on private land. In addition, much of the vegetation on both HCC and private land contains a complete forest profile ranging from mature secondary species, trees such as Tawa, and complementary undergrowth, a circumstance that does not prevail in many, if any, other wards of the City.

This aspect is a much valued contribution to the sense of place within these suburbs and contributes greatly to their desirability for residents. It is no coincidence that the Western Hill suburbs have the highest incidence of both academic qualifications and average income in the City.

We are also mindful of the Council's "*Urban Forest Strategy*" and the need to link through current valley floor Parks and Reserves to the Eastern Hills. Thus, a key aspect of our submission is the importance of retaining this visual and recreational environment within the peri-urban landscape, and the contribution that this landscape makes to the social, economic, physical and mental health of both residents and the City as a whole.

Specifically, research on the contribution of vegetation and non commercial forestry within a peri-urban environment to the overall welfare and sustainability of cities identifies a series of benefits, namely: *landscape enhancement, a sense of well-being, habitat for wildlife, and generation of microclimate*. These are discussed below.

(a) Landscape enhancement

Tree cultivation within urban areas to enhance their visual character extends throughout recorded history. Apart from the visual diversity provided, trees add coherence to an urban landscape, give a sense of civic pride, and directly contribute to the economic life of the City by attracting investment, particularly by high tech industries whose work force tend to be most environmentally aware.

¹² Hutt City Council (2003). Hutt City Council Reserves: Strategic Directions. Lower Hutt: Author.

(b) A sense of well-being

An increasing body of work identifies a sense of well-being from living, or partaking of recreation within, a tree-filled landscape that can be quantified for both psychological and physiological well being.

*“Views containing trees and other vegetation elicit preference or liking and can have positive influences on a range of other important feelings having a central role in psychological wellbeing....many scenes dominated by trees foster [psychological] restoration because they elicit positive feelings.”*¹³ and

*“[In a matched pairs trial] surgical patients assigned to rooms with windows looking out on a natural scene had shorter postoperative hospital stays, received fewer negative evaluation comments in nurses' notes, and took fewer potent analgesics than ... patients in similar rooms with windows facing a brick wall.”*¹⁴

It is this sense of well-being that we consider the most important aspect of the Western Hills, and the one that we are most anxious to preserve by preventing piecemeal degradation.

(c) Habitat for wildlife

Within the Wellington area, wildlife and bird life in particular is dominated by species that are margin dwellers. That is their preferred habitat is at the margins of treed areas that provide both cover and access to a wide variety of food sources. The maintenance of a wide diversity of flora, both endemic and introduced within the landscape ensures a broader supply of food sources, and the maintenance of reserve areas ensured continuance of the preferred habitat.

(d) Generation of microclimate

It is clear both from empirical experience and academic research that trees within a peri-urban landscape have a significant and quantifiable effect on the immediate local climate. Whilst the planting trees for wind shelter is the most common example within the Western Hills, their contribution to human comfort by shading dwellings, reducing glare and noise is well known and documented. However, the direct impact of vegetation on the comfort and sustainability of dwellings has been under-reported in New Zealand.

For example, “*vegetation can significantly affect building heating budgets. Windbreaks have been found to reduce home heating costs by 4 to 22 percent, depending on site windiness and how airtight the structure is*”¹⁵.

Similarly for noise pollution, “*trees and other vegetation in conjunction with landforms reduced highway noise by 6 – 15 dB*”¹⁶.

¹³ Ulrich, R. S. (1990). The role of trees in human well-being and health. In Proceedings of the Fourth Urban Forestry Conference, St. Louis, Missouri, USA, October 1989. Rodbell, P (Editor), p 25–30.

¹⁴ Ulrich, R. S. (1984). View through a window may influence recovery. Surgery's Science 224 (4647): 420–421.

¹⁵ Miller, R. W. (1988). Urban forestry planning and managing urban greenspaces. New Jersey, USA: Prentice Hall.

¹⁶ Cook, (1978).

We consider that the retention of the noted areas as Reserve is essential to maintain existing microclimates affecting both flora, fauna, and human habitation. We also consider that this contribution to the objectives in HCC's *Sustainability Strategy* should be noted and considered in any decision regarding disposal that could lead to a modification of the vegetative cover.

The land subject to this District Plan Change forms part of a ridge, prominent from within the suburb and from the valley floor, and constitutes a significant scenic amenity. The development of this site for housing, an inevitable consequence of the proposed change, would not only degrade the local environment visually, ecologically and socially, but would be contrary to HCC's espoused commitment to a sustainable strategy for the City's future.

4d.) Ecological value

4di.) Ecological assessment needed

When considering the different zoning options available for the Poto Road corner, Hutt City Council was of the opinion that the “*site does not have any particular ecological value*”¹⁷. However, the validity of this statement can be challenged because no publicly known ecological assessments have ever been conducted on the Poto Road corner. Even the assessment conducted by consultants PAOS, which reached the same conclusion, did not include any ecological assessment¹⁸.

4dii.) NRA's assessment of biodiversity and ecological value

When the old Normandale School reserve was released from grazing in 1947, natural processes began to take place that resulted in the predominantly native vegetation that clothes the area today. Grassland still persisted for some years and was utilised by the local community as an informal children's play area. Some of Normandale's long-term residents can still recall sliding down a grassy bank from the hilltop on a sheet of plastic. Progressively, however, much of the land was taken over by gorse and this soon provided shelter for native seedlings to establish.

Flora

The present afforestation of the site is the result of the growth of those seedlings over the intervening decades. The primary tree species are: Mahoe (*Melicytus ramiflorus*), Mapou (*Myrsine australis*), Kohuhu (*Pittosporum tenuifolium*) and Mamaku (*Cyathea medullaris*, the black tree fern) which is typical of local areas of regenerating bush. Altogether, however, the numbers of native plant species recorded are 24 trees and shrubs, 10 ferns, one climber and two orchids (**37 species**) - from a less-than-comprehensive survey (refer to Appendix C for a full list of flora at the Poto Road Reserve- which includes both the Poto Road corner and the Doc-owned reserve).

Growth has been slow and this can be attributed to little depth of topsoil, poor (or lack of) subsoil, dry summer conditions, and particularly to exposure to high winds on the south facing slopes. The land drops away steeply on the opposite (south) side of Poto Road, and when the wind is from that direction it accelerates up the slope to fierce velocities over this hilltop site. Thus, the height of trees on those exposed slopes

¹⁷Hutt City Council (2010). Proposed District Plan Change 15: Corner of Poto Road, Normandale. Zoning as General Residential Activity Area. Lower Hutt: Author.

¹⁸ PAOS Ltd. (2009). Proposed plan change Poto Road, Normandale: Assessment of open space and visual amenity. Wellington: Author.

ranges from about 1.5 m at the Poto Road edge to 3.0 m at the summit, while in the more sheltered areas, heights up to 6.0m are attained. There is a group of pines (*Pinus radiata*) just north of the summit and these extend above the general canopy to reach heights of 10.0m or more.

The progress of natural restoration is now entering a new phase as seedlings of further species establish in the protected environment of the sub-canopy. Seedlings of Pigeonwood (*Hedycarya arborea*) and Kohekohe (*Dysoxylum spectabile*) have already arrived and it may be expected that others such as Rewarewa, Hinau, Tarata, Kotukutuku, Ramarama, Heketara, Tawa and Nikau together with a further selection of ferns, will follow in the next decade. Some of these will grow contentedly in the sub-canopy while others will forge upwards with straight trunks through the canopy and then branch out, displacing some of the former growth and raising the canopy to a greater height. This will provide better living conditions and an extended larder for birds and insects.

Plantings to augment this process could include: Kohekohe, Nikau, Tawa, Totara and Miro. (These all provide fruit for the nationally declining Kereru.) Plantings in open areas (e.g. at a picnic site) could include: Kotukutuku (provides nectar for Tui and Bellbirds), *Cordyline australis* (fruit for Kereru), *Hebe stricta* (attracts Red and Yellow Admiral butterflies), *Coprosma lucida*, *C. areolata*, *C. rhamnoides* (these three produce berries for birds and lizards) and *Astelia fragrans*. The foregoing are all local native species which can aid the expansion of biodiversity.

There is a selection of pest plants on the site. These include Wild Cherry tree (featured as “bad berries”), which has a scattered presence over much of the area (particularly on the DoC-owned reserve) and Montbretia (*Crocosmia x crocosmiiflora*). The latter has infested a large area adjacent to private land at the western end of the DoC-owned land but also occupies other marginal areas. Montbretia forms very dense clumps of plants which prevent the growth of native seedlings. It is thus inhibiting the progress of natural regeneration in the vicinity.

If a subdivision was to proceed on the Poto Road corner, this would create another extensive front between private and reserve land where similar weed invasion would be likely (together with other common problems such as dumping of garden waste, litter and cutting of trees near the boundary), thus causing degradation of the remaining reserve area.

The problem of pest plants needs to be addressed in any management, upgrading or development of the area.

Fauna

Fauna at the site includes: birds, reptiles, insects and other invertebrates. There are also domestic animals that visit the area. Each of these is discussed below.

Most of the local bush and field birds have been observed at the site. Others, such as the Dominican Gull, Spur-winged Plover and Karearea pass overhead and may alight occasionally. The Karearea is based in Belmont Regional Park but includes the Normandale valley, Poto Road corner and other local bush areas in its hunting grounds. These areas provide prey in the form of other birds which the Karearea will

take in mid-air. Altogether, **16 species** of birds have been observed at this site (refer to Appendix C for the full list of birds).

Reptiles are represented by the Common Skink (*Oligosoma nigreplantare polychroma*). (Geckos may also be present but they are not often observed.)

The invertebrate fauna can only briefly be considered in this document. The following butterflies and weta are noted as samples:

- Butterflies: Red Admiral (*Vanessa gonerilla*); Glade Copper (*Lycaena feredayi* complex)- the caterpillar of this butterfly lives on Pohuehue (*Muhlenbeckia australis*) which is growing on the site; and White Butterfly (*Pieris rapae*).
- Weta: Wellington Tree Weta (*Hemideina crassidens*). There are many of these extraordinary insects here. A former neighbour on adjoining land used to provide weta hotels to encourage them. They feed at night on leaves and small insects but are themselves eaten by Ruru which also hunt at that time.

A cat seen recently near the summit on the site appeared very much at home. It obviously frequents the area from a nearby property or may be a stray that is living on the site. Cats are natural predators and will eat small birds, lizards, wetas, moths and cicadas. This also reduces the food supply available to birds. The introduction of housing onto the Poto Road corner would undoubtedly bring more of these predators into closer proximity with a reduced living space for the native fauna, thus multiplying the threat several times.

This area (including the Poto Road corner and DoC-owned reserve) contains an extensive and expanding biodiversity with ecological relationships both within and beyond the site. It should, therefore, be highly valued and considered for retention as a whole. Development of the site as a reserve should proceed in a sensitive manner to protect the diverse species and their relationships. It should then be possible to augment the biodiversity, enhance the natural beauty, and provide an exhilarating place where people are close to nature.

4e.) Meeting Reserves Key Directions

It is argued that the Poto Road corner meets a number of key directions and principles as outlined in Hutt City Council's *Reserves Strategic Directions*¹⁹ document, namely, *consolidation of existing reserve network; environmental enhancement; recreational access; and strengthening community relationships*.

4ei.) Consolidation of existing reserve network

One of the key actions underpinned in this strategic direction is that Council reviews its reserves land to ensure that “*important heritage and cultural sites are protected*”. The Poto Road corner is a historic site as it is part of the original 1911 Normandale school site. As mentioned in *Section 4ai*), the original school building still exists and because of this, the Poto Road corner is very much part of the historic landscape of Normandale and Lower Hutt City.

¹⁹ Hutt City Council (2003). *Hutt City Council Reserves: Strategic Directions*. Lower Hutt: Author.

4eii.) Environmental enhancement

Under this strategic direction, one of the key actions for the Western Hills is “*protecting regenerating bush gullies and developing ecological corridors to link with the bush areas of Belmont Regional Park*”. What is puzzling is that while PAOS (2009) acknowledges that an ecological corridor to Belmont Regional Park exists “*in the immediate neighbourhood along Draper Reserve*” (PAOS, 2009, p.6), it believed that zoning Poto Road corner as General Residential would “*be unlikely to detract from the existing ecological corridor*”.

The perplexing part is that if there currently is an existence of an ecological corridor to Belmont Regional Park at the Poto Road corner, then surely it needs to be protected. Moreover, it is argued that building houses at the Poto Road corner would in fact *disrupt* the existing ecological corridor from Belmont Regional Park to Draper Reserve, and that this would be contrary to the strategic direction for the Western Hills.

4eiii.) Recreational access

For this strategic direction, one of the key actions for the Western Hills is to “*link existing bush gullies and provide walking access from the Hutt River to Belmont Regional Park. Develop access to the Western Hills open space to provide pedestrian and cycle recreation opportunities*”. Moreover, a further key action identified was to “*improve access opportunities to reserves generally to cater for ageing and less mobile members of the community, including wheelchair and pushchair access*”.

Zoning the Poto Road corner as *General Recreation Activity Area* would meet the community’s expressed need for better recreational facilities/opportunities in the area, and to have improved access to such facilities/opportunities. At the moment, the needs of families with young children, and those who are aged in the community, are not being met.

4eiv.) Strengthening community relationships

Should the Poto Road corner be zoned as a *General Recreation Activity Area*, the NRA would set up a “*working bee*” within the community to help beautify the reserve. Judging by the number of residents in the community who signed the petition, it is anticipated that there would be sufficient interest within the community for active “*community participation in the protection, restoration and improvement of bush areas, and historic and cultural sites*” as outlined in this strategic direction. It would also provide the community with an opportunity to take ownership of the community reserve and participate in its development. The NRA would be committed to work alongside Hutt City Council and the Department of Conservation to achieve this objective.

4f.) Meeting the Reserve Land Acquisition/Disposal Policy and Guidelines

In their assessment of the potential effects of the proposed zone change, the methodology used by consultants PAOS (2009), was to use “*good judgment and common sense*” (PAOS, 2010, p.10), to assess whether the Poto Road corner met the criteria set by Hutt City Council’s *Reserve Land Acquisition/Disposal Policy Guidelines*. The most obvious limitation of using such methodology is that it is highly subjective, non-empirical, and can be challenged.

Contrary to the findings of PAOS (2009), it is argued that the Poto Road corner has a number of high/medium significant features, when assessed against the criteria set by the Council's *Reserve Land Acquisition/Disposal Policy Guidelines*, namely: *landscape-visual; landscape-open space; landscape-natural site features; ecological; recreation- informal; and heritage*. These are discussed below.

4fi.) Landscape-Visual

If the Poto Road is to be zoned *General Residential Activity Area*, then this would have an impact on the visual landscape of Normandale. The land in question sits on a prominent bush-clad ridge in the suburb (refer to Figure 1 below), and as the photographs in PAOS (2009) show, the site is highly visible from a number of neighbouring properties and suburbs (such as Maungaraki, Harbour View, and Tirohanga). The Poto Road corner also provides a scenic "green" backdrop and reinforces Normandale's unique character. The location of the site also promotes "integration" between the "hard and soft environment" and contributes to the overall "harmony between the built and natural environment"²⁰.



Figure 1. The Poto Road corner is in the foreground. As the photo illustrates, the Normandale suburb has a uniquely 'green' skyline (photo courtesy of Grant Roberts).

4fii.) Landscape-Open space

Historically, the land at the Poto Road corner was set aside as a recreation reserve for the community, to replace the larger reserve the community lost at Martin Grove, due to the building of the second Normandale school in 1969. As mentioned previously in

²⁰ PAOS (2003). Reserve Land Acquisition/Disposal Policy & Guidelines: Hutt City Council. Wellington: Author.

Section 4e), it is argued that the land at the Poto Road corner meets a number of Hutt City Council's Reserves Strategic Directions (namely: consolidation of existing reserve network; environmental enhancement; recreational access; and strengthening community relationships), and that zoning of the land to General Activity Residential Area would result in the loss of open space for the community.

4fiii.) Landscape-Natural site features & Ecological

As mentioned in *Section 4dii)*, the Poto Road corner has ecological value. There is regrowth of native flora on the site, which is a *natural restoration project* that is almost 50 years advanced. The land is contiguous with, and naturally complements, the adjacent Department of Conservation reserve. The loss of this contiguous area would impact on the biodiversity that currently exists. PAOS (2009) supported this by stating that “zoning the sites General Recreation would allow the bush on the sites... to regenerate further, with a further range of native species developing on the sites”.²¹ It also needs to be considered that the clearance of vegetation would also open the site to severe winds, and that potential earthworks would effect the groundwater conditions.

4fiv.) Recreation-Informal

The Poto Road corner has the potential to meet the recreational needs as expressed by the community. If the land is zoned as *General Recreation Activity Area*, and the land is re-integrated with the adjacent DoC-owned reserve, then there is the possibility of making available a range of informal recreational opportunities for the community, namely cycling and walking. Moreover, because it is in close proximity to urban houses, this provides easy access to a natural environment for *all* members of the community to enjoy. The NRA's vision of the recreational potential of the *Poto Road Reserve* is expanded below in *Section 5a*).

4fv). Heritage

As mentioned in *Section 4ai)*, the Poto Road corner is part of the old Normandale school site, which is 99 years old. It is therefore considered to be of historic value and part of the historic landscape of Normandale. Moreover, the original school building still exists on the site, and because of this, it is considered essential that the original school site is preserved.

4g.) Maintaining Normandale's character

According to the *Hill Residential Activity Area* chapter of the City of Lower Hutt District Plan²², the “*hillsides of the City*” are characterized by “*steep slopes, difficult access, low density residential development, extensive areas of vegetation and native bush*”. It is argued that zoning the Poto Road corner as *General Residential Activity Area* would contravene a number of policies outlined in the District Plan for the Hill Residential Activity Area, namely, policies: (a) to minimize adverse effects from earthworks; (b) to avoid, remedy, or mitigate against adverse effects from the clearance of vegetation; and (d) to preserve the natural appearance of the skyline.

Building houses on the Poto Road corner will undoubtedly alter the visual amenity value of the Normandale suburb and alter its character. First, the 7-lot high-density

²¹ PAOS Ltd. (2009). Proposed plan change Poto Road, Normandale: Assessment of open space and visual amenity. Wellington: Author.

²² Hutt City Council (2004). District Plan- City of Lower Hutt. Lower Hutt: Author.

development plan proposed by Hutt City Council is inconsistent with the low density residential character of the suburb. Second, the clearance of vegetation and earthworks at the Poto Road corner will destroy the almost 50-year old ecosystem currently in existence in the Poto Road corner (refer to *Section 4dii*) and will negatively impact on the existing ecosystem in the adjoining DoC-owned reserve. Third, as the Poto Road corner sits on a prominent and highly visible ridge of the suburb, the building of houses at the site will result in the permanent loss of Normandale's characteristic "green skyline" (refer to *Section 4fi*).

It is also argued that since Hutt City Council's development plans for the Poto Road corner are incongruent with the policies outlined in its own District Plan, Council's actions are in breach of Section 84 of the Resource Management Act 1991 which states the following²³:

"84 Local authorities to observe their own policy statements and plans

(1) While a policy statement or a plan is operative, the regional council or territorial authority concerned, and every consent authority, shall observe and, to the extent of its authority, enforce the observance of the policy statement or plan.

(2) No purported grant of a resource consent, and no waiver or sufferance or departure from a policy statement or plan, whether written or otherwise, shall, unless authorised by this Act, have effect in so far as it is contrary to subsection (1)."

²³ <http://www.legislation.govt.nz/act/public/1991/0069/latest/DLM233830.html>

5.) We seek the following decision from Hutt City Council: to zone the two parcels of land at Poto Road corner, Normandale, as *General Recreation Activity Area*; for the land to be classified as a recreation reserve subject to the Reserves Act 1977; and for the land to be added to Hutt City Council's reserve network. Below is the NRA's vision for the Poto Road corner.

5a.) A useable recreational reserve

5ai.) Re-establishing the 1911 school site

The Poto Road corner is a unique piece of land. Not only is it of historic value, but also, the land sits on a prominent bush-clad ridge, is the last hilltop land in urban Normandale that is in public ownership, and has the potential to be turned into a useable recreational reserve as originally intended forty-nine years ago.

The irony is that the current vision of what the NRA has for the land is not so different from its predecessors in the 1960s, 1970s, and more recently in the 1980s. In the majority of submissions Council received (in their consultation with the community in 2008, regarding the disposal of the Poto Road corner), “*most submitters against the proposal [to dispose of the Poto Road corner] request that Council consider making the area into a children's play area or a park incorporating play equipment, bike and/or walking tracks, a BBQ and seating*”.²⁴ In response to this, Hutt City Council made provisions for a walking/biking trail and a picnic area on the adjacent Department of Conservation reserve in their latest Indicative Development Plan for Poto Road²⁵. While it is responsive of Council to propose this, it has to be remembered that the issue at hand is not about the Department of Conservation land.

If Hutt City Council is amenable to “*a limited development of the adjoining reserve land for a cycle track and picnic area as requested by the local community*”²⁶, then it would seem logical to extend this development to include the Poto Road corner, to ensure that the community is able to enjoy a larger and more useable recreation reserve. This is supported by Tonkin & Taylor (2009), who identified in their report that a “*reasonably useable reserve*” could be achieved by combining land at the Poto Road corner, with the adjacent recreation reserve currently owned by the Department of Conservation.

The re-integration of the land at the Poto Road corner with the Department of Conservation land would also effectively reinstate the almost 100 hundred year-old school site. This in itself is of historical significance to Normandale and Lower Hutt City.

5aii.) NRA's vision for the Poto Road Reserve

As mentioned earlier, the NRA would like to see land at the Poto Road corner integrated with the Department of Conservation land; for that land to be beautified; and for it to provide recreational opportunities that are accessible to *all* sectors of the community.

²⁴ Hutt City Council. (2008). Western Ward Land Review: Report on Submissions, 20.6.08. Lower Hutt: Author.

²⁵ Hutt City Council (2010). Proposed District Plan Change 15: Corner of Poto Road, Normandale, Zoning as General Residential Activity Area. Lower Hutt: Author.

²⁶ Hutt City Council. (2009). Resolution of meeting minutes held on Wednesday 6 May 2009. Lower Hutt: Author.

The NRA, however, is also aware that there would be costs to Council associated with our vision for the *Poto Road Reserve*. We, therefore, propose that the development of the reserve would be a community-driven initiative, led by the NRA, and with assistance provided from the Hutt City Council and the Department of Conservation.

In terms of the recreational opportunities that the reserve would provide, the NRA has a number of alternative proposals for the *Poto Road Reserve*. Below is an example of one such proposal. Other proposals will be presented at the *submission hearing*.

One alternative proposal is for the recreation reserve to have: two-looped interconnected cycle/walking track(s); two defined picnic areas with picnic benches, where families can enjoy having picnics in natural settings; look-outs at two different vantage points on the reserve, so that *all* members of the community will be able to enjoy the panoramic views offered by the reserve (refer to Appendix D); and provisions for car-parking, to facilitate access to the reserve (refer to Figure 2 below).

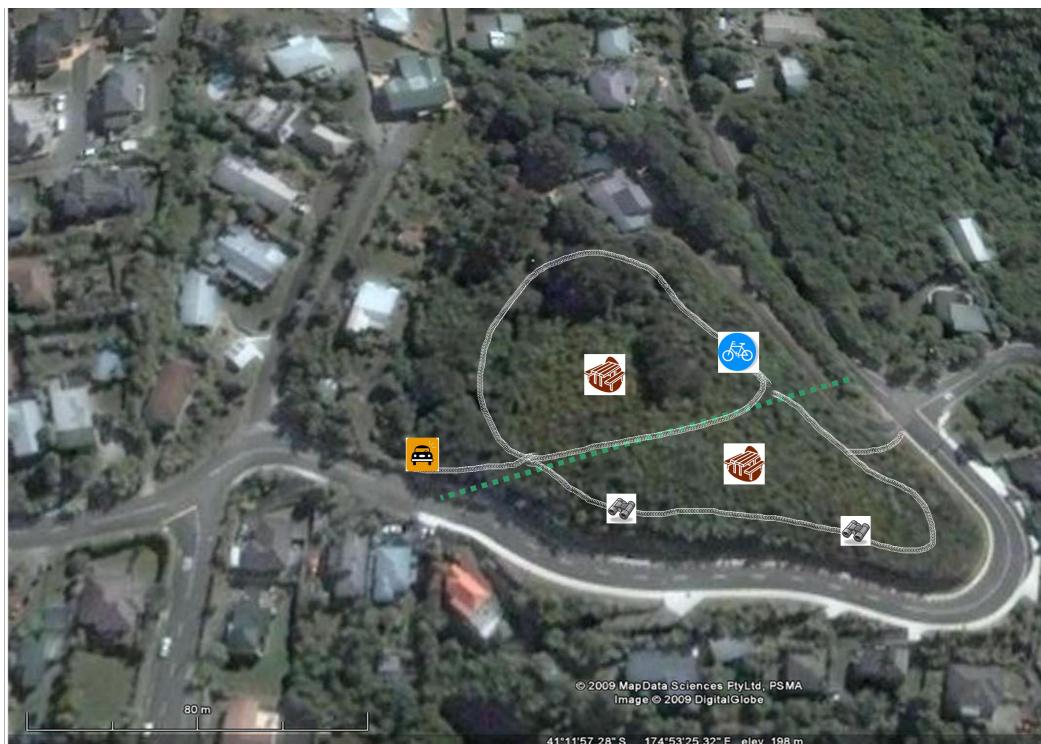


Figure 2. The NRA's alternative proposal for the *Poto Road Reserve*. The white line indicates the proposed walking/cycle track which loops throughout the reserve.

The provision of “picnicking”, “panoramic viewing”, and “mountain-biking” opportunities are all congruent with the recreational facilities the Western Hills can offer its residents, and is also consistent with Hutt City Council’s strategic direction to “develop access to the Western Hills open space to provide pedestrian and cycle recreation opportunities” (Hutt City Council- Reserves Strategic Directions, 2003, p.12).

It also has to be remembered that the addition of a useable reserve would not only be of benefit to the local community but also to those in the wider community, including those living in Lower Hutt City. For example, it is not uncommon to see organized walking and cycling groups who frequently walk/cycle Normandale road (and pass the Poto Road corner) as they enjoy the challenging terrain and the unique character that the Normandale suburb has to offer. These groups would no doubt benefit from an additional off-road recreational opportunity in the area.

In summary, the NRA is opposed to the zoning of Poto Road corner as *General Residential Activity Area* and requests that the land is zoned as *General Recreation Activity Area*.

We conclude with a quote from a resident in the community who had the following to say, in the recent community survey conducted by the NRA about the Poto Road corner:

“A plea to HCC to please retain this green oasis. Have a look back at it from further up Normandale Rd and see how very precious this area is now.”