

**Before the Hearings Panel  
At Porirua City Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Porirua District Plan

**Between** **Various**

**Submitters**

**And** **Porirua City Council**

**Respondent**

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**Statement of evidence of Rose Armstrong, Landscape Architect, on behalf of  
Porirua City Council (Landscape Evidence)**

**Date: 20 December 2021**

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## **INTRODUCTION:**

- 1 My full name is Rose Armstrong. I am employed as a Landscape Architect at Isthmus Group Limited, in Wellington.
- 2 I have prepared this statement of evidence on behalf of the Porirua City Council (**Council**) in respect of technical related matters arising from the submissions and further submissions on the Proposed Porirua District Plan (**PDP**).
- 3 Specifically, this statement of evidence relates to Submission 172<sup>1</sup>, which is a proposal for part of the Cannons Creek Ridge Special Amenity Landscape (SAL) in the PDP to be re-zoned from General Rural Zone (GRZ) to Future Urban Zone (FUZ).
- 4 My evidence addresses whether the proposed re-zoning could accommodate comprehensive and integrated future development that avoids, remedies or mitigates any adverse effects on the SAL<sup>2</sup>; and whether that is demonstrated in the Landscape Evaluation<sup>3</sup> of the Draft Structure Plan<sup>4</sup> which accompanies the submission.
- 5 I am authorised to provide this evidence on behalf of the Council.

## **QUALIFICATIONS AND EXPERIENCE**

- 6 I hold the qualifications of Bachelor of Landscape Architect (Hons), from Lincoln University; and Bachelor of Arts from Victoria University.

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<sup>1</sup> Submission 172 - Silverwood Corporation Limited.

<sup>2</sup> FUZ-P1

<sup>3</sup> Appendix 6 to the Submission: Porirua City Council Proposed District Plan Submission, Landscape Evaluation - Silverwood Corporation; Nov 2020, Hudson Associates Landscape Architects.

<sup>4</sup> Appendix 1 to the Submission: Draft Structure Plan.

- 7 I am a registered member of the New Zealand Institute of Landscape Architects Tuia Pito Ora. I am also a member of the Resource Management Law Association.
- 8 I have 18 years professional experience, including undertaking district plan review work relating to landscape matters, and assessment of landscape, natural character and visual effects for development proposals. My work has included projects across Aotearoa New Zealand, but in recent times has been focused in the lower half of the North Island. Recent projects of relevance to the hearing include work to confirm Porirua's draft ONFL and SAL for inclusion in the PDP<sup>5</sup>; review of the Plimmerton Farm Structure Plan and related provisions; review of the Ridgelines and Hilltops Overlay in the Wellington City District Plan in relation to draft ONFL and SAL, and in relation to growth; and ongoing work in the Porirua District, including the Wi Neera to Onepoto Shared Pathway and Coastal Resilience Project, and the Bothamley Park Sewer Upgrade for Te Aranga Alliance.
- 9 I am familiar with the Porirua District, through my professional experience and having grown up in the area.

**Code of conduct**

- 10 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Environment Court. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have

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<sup>5</sup> The Final Porirua Landscape Evaluation 2020, Isthmus Group Ltd., completed for Porirua City Council.

not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

## **SUMMARY**

11 My name is Rose Armstrong.

12 I have been asked by the Council to provide landscape evidence in relation to Submission 172,<sup>6</sup> which is seeking for part of the PDP's Cannons Creek Ridge SAL to be re-zoned from General Rural Zone (GRZ) to Future Urban Zone (FUZ).

13 The Submission includes a Draft Structure Plan for the area, although its inclusion in the PDP is not sought, at this stage, by the submitter.

14 My statement of evidence addresses whether the proposed re-zoning could accommodate comprehensive and integrated future development that avoids, remedies or mitigates any adverse effects on the SAL; and whether that is demonstrated in the Landscape Evaluation<sup>7</sup> of the Draft Structure Plan<sup>8</sup> which accompanies the submission.

15 In summary, my evidence is that:

15.1 There would be risks to the SAL values in re-zoning to FUZ as proposed. This is because:

- The FUZ is a "holding zone" which anticipates an eventual comprehensive landscape character change, with the

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<sup>6</sup> Silverwood Corporation Limited.

<sup>7</sup> Appendix 6 to the Submission: Porirua City Council Proposed District Plan Submission, Landscape Evaluation - Silverwood Corporation; Nov 2020, Hudson Associates Landscape Architects.

<sup>8</sup> Appendix 1 to the Submission.

inclusion of urban (residential type) development on smaller lots<sup>9</sup>;

- While some parts of the Cannons Creek Ridge SAL may be able to accommodate smaller-lot residential type development, this would be limited, rather than comprehensive (for example, by the use of discrete clusters), to maintain SAL values;
- The maintenance and enhancement of SAL values would depend on the Structure Plan developed for the area; and the submission does not seek for inclusion of a Structure Plan in the PDP at this stage;
- While development of any Structure Plan would need to consider the NFL Chapter Objectives and Policies,<sup>10</sup> these appear to be at odds with the comprehensive character change provided for in the FUZ (urban development), which could pose a risk to SAL values;
- It is not clear what the anticipated permanent zoning being sought is. Urban zoning such as General Residential would make maintenance of SAL values difficult, even where this is managed through a Structure Plan. Rural Residential zoning would provide greater scope to maintain and enhance values, is seen as more appropriate, but may be precluded by the FUZ, which has urban development as its purpose.

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<sup>9</sup> Land in the FUZ is expected to eventually be re-zoned for urban development, once a Structure Plan for the land has been developed. Possible urban zoning could include the General Residential Zone or the Medium Density Zone. In the PDP the General Residential Zone has a minimum lot size of 400m<sup>2</sup>; the Medium Density Zone has a minimum lot size of 300m<sup>2</sup>.

<sup>10</sup> Particularly NFL-O2, NFP-P3 and NFL-P4, as advised by Council officers. In summary these require development inside SAL to be of a scale and type (including sensitive design measures) able to maintain SAL values.

15.2 The Landscape Evaluation of the Draft Structure Plan<sup>11</sup> shows that there is potential for inclusion of development in the SAL at a more intensive scale (lot size) than provided for in other SALs. In my opinion, to maintain and enhance SAL values across the extent of the SAL, this would need to be in a more limited way than shown in the Draft Structure Plan.

#### **INVOLVEMENT WITH THE PROPOSED PLAN**

16 I have been involved in the PDP since early 2019, when Isthmus was engaged by PCC to engage with mana whenua to confirm the boundaries of mapped ONFL and SAL, and the Schedules<sup>12</sup> of Characteristics and Values associated with each of those areas, for inclusion in the PDP.

17 In addition to responding to this submission, I have also provided a statement of evidence in relation to other submissions on the PDP on the mapped extents of the ONFLs and SALs, and the characteristics and values listed in their associated Schedules.

#### **SCOPE OF EVIDENCE**

18 My statement of evidence addresses the following matters:

18.1 Whether the proposed re-zoning could accommodate comprehensive and integrated future development that avoids, remedies or mitigates any adverse effects on the SAL; and

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<sup>11</sup> Appendix 6 to the Submission: Porirua City Council Proposed District Plan Submission, Landscape Evaluation - Silverwood Corporation; Nov 2020, Hudson Associates Landscape Architects.

<sup>12</sup> Schedule 9 for ONFL, and Schedule 10 for SAL, in Part 4 of the PDP.

- 18.2 Whether the Landscape Evaluation<sup>13</sup> of the Draft Structure Plan<sup>14</sup> included with the submission demonstrates the potential for such development to avoid, remedy or mitigate any adverse effects on the SAL (i.e. to maintain SAL characteristics and values).

## **EVIDENCE**

### **Proposed Re-zone from GRUZ to FUZ in part of the Cannons Creek Ridge SAL**

- 19 In my opinion there would be risks to the SAL characteristics and values in re-zoning to FUZ as proposed. This is because:

19.1 The FUZ is a “holding zone” which anticipates an eventual comprehensive landscape character change, with the inclusion of urban (residential type) development on smaller lots<sup>15</sup>;

19.2 While some parts of the Cannons Creek Ridge SAL may be able to accommodate a type of residential development, this would be limited, rather than comprehensive, to maintain and enhance SAL values. For example, there could be an appropriate development pattern that integrates discrete residential clusters and roading/connections, and with other areas remaining undeveloped;

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<sup>13</sup> Appendix 6 to the Submission: Porirua City Council Proposed District Plan Submission, Landscape Evaluation - Silverwood Corporation; Nov 2020, Hudson Associates Landscape Architects.

<sup>14</sup> Appendix 1 to the Submission.

<sup>15</sup> The areas currently identified in the FUZ have residential scale development as a primary purpose. Further areas identified in the FUZ have “serviced urban development” specified as the purpose. Refer FUZ-O1. Land in the FUZ is expected to be re-zoned for urban development, once a Structure Plan for the land has been developed. Possible urban zoning could include the General Residential Zone or the Medium Density Zone. In the PDP the General Residential Zone has a minimum lot size of 400m<sup>2</sup>; the Medium Density Zone has a minimum lot size of 300m<sup>2</sup>.

- 19.3 The maintenance and enhancement of SAL values would depend on the Structure Plan developed for the area;
- 19.4 The submission does not seek for inclusion of a Structure Plan in the PDP at this stage;
- 19.5 While the Structure Plan development would need to consider the NFL Chapter Objectives and Policies,<sup>16</sup> these appear to be at odds with the comprehensive character change provided for in the FUZ;<sup>17</sup>
- 19.6 The competing intentions of the FUZ and the NFL Chapter could open a risk to SAL values. At best there is a question on the value of the proposed FUZ change. To avoid, remedy and mitigate it is likely that the Structure Plan would need to limit urban type development in the SAL areas, which would erode the relevance of the FUZ change.
- 20 It is unclear from the proposal what the intended future zoning would be, for the Structure Plan.
- 21 It is logical to assume that the FUZ would preclude a zone change to rural residential activities, given its primary purpose for urban/residential development.
- 22 Rural residential zoning, with a structure plan in place, provides a greater opportunity to provide for an appropriate development type, that would maintain and enhance SAL values. In contrast, urban zoning, such as

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<sup>16</sup> Specifically, NFL-O2, NFP-P3 and NFL-P4, as advised by Council officers. In summary these require development inside SAL to be of a scale and type (including sensitive design measures) able to maintain SAL values.

<sup>17</sup> Appendix 11 of the PDP (Future Urban Zone Structure Plan Guidance) sets out the matters to be identified, investigated and addressed in a Structure Plan. These include areas of Outstanding Natural Features and Landscapes, areas of Coastal High Natural Character Areas and Significant Natural Areas, but do not include SAL values as a matter to be addressed – although council officers have indicated that this may be an oversight.



General Residential Zone (GRZ), would introduce significantly greater risk to these values, even when managed through a Structure Plan.

### **Landscape Evaluation of the Draft Structure Plan/Draft Structure Plan**

- 23 In my opinion the Landscape Evaluation of the Draft Structure Plan (“the Evaluation”) attached to the submission does demonstrate that there is potential for inclusion of urban development in parts of the SAL, while still maintaining SAL characteristics and values, and with enhancement of some values in remaining, undeveloped parts.
- 24 There is potential for this to be achieved through the inclusion of sensitive, clustered development inside less sensitive parts of the SAL,<sup>18</sup> with inclusion of well-located and considered roading and connections (also in less sensitive parts),<sup>19</sup> and with remaining parts of the SAL left undeveloped and managed to maintain and enhance SAL values in those parts.
- 25 In my opinion, the proposed cluster approach, even with the inclusion of smaller lot sizes<sup>20</sup> than provided for in other SAL by the PDP, has potential to achieve a good landscape outcome for the SAL. An appropriate development, with smaller lot sizes, can provide for large parts of the SAL (including more sensitive parts) to be free of earthworks and development patterning; and the values in those undeveloped parts can be enhanced.

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<sup>18</sup> Such as on gentle slopes, avoiding waterways and rooflines above the ridgeline, (use of less elevated areas), and where buildings are kept clear from landmark features within the SAL.

<sup>19</sup> For example, it may be possible to provide a connection from adjacent areas at Waitangirua, as a method to reduce roading earthworks, visibility, and the extent of roading needed.

<sup>20</sup> As proposed by the Draft Structure Plan.

- 26 The proposed approach differs from that permitted in the PDP for other SALs,<sup>21</sup> but has potential to provide for inclusion of a more sustainable lot-size in the SAL, (in less sensitive areas), and development which is well-connected into the local community and existing infrastructure.
- 27 A key consideration would be how remaining undeveloped parts of the SAL would be managed, and by whom, to enable values to be maintained or enhanced (as proposed by the Draft Structure Plan). The Landscape Evaluation recommends that protective covenants, reserve management plans or open space covenants be applied.
- 28 In general, with intensification of existing urban areas at Eastern Porirua (re-zoned in the PDP for Medium Density Residential development), the value of the Cannons Creek Ridge SAL as an undeveloped backdrop and visual break for local communities from development, will become increasingly important.
- 29 In my opinion, there would need to be less development in some parts of the SAL than proposed in the Draft Structure Plan, to maintain SAL values.
- 30 This relates in particular to the level of development proposed at Waitangirua Hill, at the northern end of the SAL, which provides the undeveloped backdrop for Maraeroa Marae.<sup>22</sup> (The Landscape

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<sup>21</sup> Development in SALs in Porirua is predominantly provided for in the PDP in the Rural Lifestyle Zone (RLZ), with a 5ha minimum lot size and design measures (e.g. to minimise earthworks and the visual impact of buildings), used to maintain SAL values. While this approach will be successful to maintain values, and will achieve a less intense level of development inside SALs than in other parts of the underlying zone (RLZ), it could result over time in a patterning (although fairly sparse) of development across the extent of SAL areas.

<sup>22</sup> Further SAL values have been identified for Waitangirua Hill through the submission process, with a submission received proposing Waitangirua Hill as ONFL (Submission 147). There is support from Ngāti Toa for the submission (Further Submission 70). While I have not recommended that Waitangirua Hill be included as ONFL in response (due to the Hill's not meeting a high enough level across the natural science, sensory and shared and recognised factors), in my opinion there would likely need to be less development in this area, to maintain SAL values.

Evaluation also recommends particular further consideration in this area.)

- 31 As indicated by the Landscape Evaluation, there would need to be considerable further work to the Draft Structure Plan, including further consideration of requirements for design measures to mitigate adverse landscape effects, in developed parts of the SAL. These would need to address design of clustering, proposed lot sizes in the different development areas,<sup>23</sup> and matters such as minimised earthworks for roads, building platforms and accessways; as well as built form design. A high level of control would be appropriate in all parts of the SAL, particularly as smaller lot sizes are proposed than applying in other SALs (even if this is to incentivise enhanced values in undeveloped parts).<sup>24</sup>

Rose Armstrong

Senior Landscape Architect/Design Planner

**Isthmus**

**Date:** 20 December 2021

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<sup>23</sup> For example, the Draft Structure Plan suggests roughly 1.5ha - 2ha lots immediately adjacent to Waitangirua (Development Area 3 Waitangirua Community), in lower elevated areas. There could be potential in this Area for a smaller lot size, with appropriate design.

<sup>24</sup> Note: The Landscape Evaluation and Draft Structure Plan have been reviewed at a high level only for this evidence, with a focus on consideration of the potential indicated for inclusion of development appropriately. The Draft Structure Plan as it stands is not proposed for inclusion in the PDP. Comments made in this evidence on further work needed to the Draft Structure Plan are not exhaustive.