

**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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**Reply on Hearing Stream 5 of Rose Armstrong, Landscape Architect, on behalf  
of Porirua City Council**

**Date: 27 July 2022**

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## **INTRODUCTION:**

- 1 My full name is Rose Armstrong. I am employed as a Senior Landscape Architect at Isthmus Group in Wellington.
- 2 I have read the evidence and tabled statements provided by submitters relevant to landscape matters and the Future Urban Zone (FUZ).
- 3 I have prepared this Reply on behalf of the Porirua City Council (**Council**) in respect of matters raised in oral evidence for Hearing Stream 5, with regards to the FUZ and the Panel Minute 44.
- 4 Specifically, this reply relates to the submission from Silverwood Corporation Limited (Silverwood team) seeking a zone change for Lots inside Special Amenity Landscape 004 Cannons Creek, (SAL004), from Rural to FUZ, and points arising in evidence during the hearing on 5 – 6 July 2022.
- 5 I am authorised to provide this evidence on behalf of Council.

## **QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT**

- 6 My Statement of Evidence<sup>1</sup> for Hearing Stream 5 sets out my qualifications and experience.
- 7 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2014.

## **SCOPE OF REPLY**

- 8 This Reply follows Hearing Stream 5 held on 5 and 6 July 2022.

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<sup>1</sup> Dated 20 December 2021.

- 9           The main topics addressed in this Reply include:
- Mapping requested by the Hearings Panel in Minute 44 (point 13(k)) to show the area identified in the hearing (by myself) where, (in my opinion), development on the Silverwood site should be avoided (as included in Appendix 1 to the Reply);
  - An additional point in response to a question from the Hearings Panel during the hearing, on landscape comparisons which could be made between SAL005 Belmont Hills and SAL004 Cannons Creek, (with SAL005 including FUZ in the notified PDP, and FUZ sought inside SAL004 by the Silverwood team);
  - A number of points raised by the Silverwood team in evidence, relating to:
    - The extent of development across the Silverwood site which will be able to maintain and enhance SAL values;
    - Development areas in the Silverwood draft Structure Plan identified by the Silverwood team during the hearing as being suitable for medium density zoning and development.
- 10           My Reply (in response to the Silverwood team evidence – as set out above), provides more detailed comments on the draft Structure Plan than included in my earlier Statement of Evidence and Supplementary Statement.<sup>2</sup>

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<sup>2</sup> As per the council brief, my Statement of Evidence focused mainly on possible risks to SAL values from the proposed FUZ zoning, and the potential demonstrated in the Silverwood team submission for inclusion of comprehensive and integrated development, rather than on the details of the draft Structure Plan in the submission.

11 I completed a site visit to parts of Waitangirua surrounding the site, and drove along the Waitangirua Link Road, (the location of proposed access roads to the site), for the mapping requested in Minute 44.<sup>3</sup>

## **MINUTE 44 – HEARING STREAM 5 FOLLOW UP (2)**

### **Mapping requested**

12 In Minute 44<sup>4</sup> the Hearings Panel made the request:

*"Can Ms Armstrong please provide a map showing the area she identified where development on the Silverwood site should be avoided".*

13 I have attached a broad-scale map as Appendix 1, showing those parts of the SAL I consider should be avoided in development of the site, to maintain SAL values.<sup>5</sup> In summary, these parts include much of the

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<sup>3</sup> The site visit was in addition to that completed for my Evidence Statement (dated 20 December 2021). I completed the second visit (to the context) as the requested mapping required a different "lense" or focus, to that needed for my Evidence Statement (relating to the Council brief for the Evidence).

<sup>4</sup> Minute 44, page 4, 13(k).

<sup>5</sup> The mapping is provided over the Silverwood draft Structure Plan, so it can be easily seen in relation to the development areas proposed by Silverwood. I have completed a visit to areas in Waitangirua surrounding the site, and have driven along the Waitangirua link road, for the mapping. However, the mapping should be considered as "high-level" – noting that I have not done a detailed analysis of the site natural features and contours, and that the mapping does not include input from Ngāti Toa Rangatira on the effects of development inside the IGL mapped area, on cultural landscape values. (Cultural landscape values form part of Shared and Recognised values. Input from Ngāti Toa would, therefore, be needed to confirm mapping of areas for development to avoid – taking all potential effects into account). The IGL mapping in Appendix 1 shows those parts of the site I consider most sensitive to development – being skyline parts, most highly elevated and visible slopes, very steep slopes, and distinct landform features within the SAL; and with high-level consideration of the extent of development across the site which will, in my opinion, maintain the integrity of the SAL in terms of the GWRPS qualitative tests (Policy 27). While the IGL mapping graphic does not include Significant Natural Areas (SNA) or wetter/drainage areas with potential for restoration, it is assumed that these areas would also be avoided.

Waitangirua Hill<sup>6</sup> landform, (particularly west-facing slopes above Waitangirua), the main ridge through the SAL (with associated hilltop slopes below the ridgeline), and an area of very steep and complex topography above the Waitangirua Link Road to/from the Transmission Gully motorway.

- 14 The draft Structure Plan includes development across the Waitangirua Hill landform except at the knoll/trig area and immediately adjacent (lower) slopes. In my opinion, this level of development on the Hill would be likely to adversely impact identified Sensory and Shared and Recognised values of the SAL relating to the distinct and recognisable landscape “marker” the Hill/landform provides (being visually distinct from adjacent developed areas).
- 15 The proposed roading in the Draft Structure Plan (where it crosses the main ridgeline, and where it traverses the steep and complex topography in the northern parts of the SAL above the Waitangirua Link Road), could also, in my opinion, put SAL values at risk – by extending earthworks and development into these visually prominent and sensitive parts of the SAL, including at the skyline (on the main ridge, in some views<sup>7</sup>).
- 16 If roading across the main ridge is unavoidable for development of the site,<sup>8</sup> its design would (in my opinion) need to use an appropriate

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<sup>6</sup> This refers to the distinct hill landform in the SAL which backdrops Maraeroa Marae. As discussed in the hearing, there has been some difficulty in defining “Waitangirua Hill”, within the SAL. As advised in the hearing, in the absence of any other definition to date, I have taken Waitangirua Hill to mean the distinct landform at the north-western end of the SAL backdropping the Marae, as this landform is separated from the SAL’s main ridge and is visually distinct, and marked by a trig point in topographical maps (as also noted by Mr. Hudson, the Silverwood team’s landscape expert, in the hearing). The landform/Hill is mapped in Appendix 1 to this Reply.

<sup>7</sup> The main ridge is also identified as a sensitive part of the site, in the Silverwood submission.

<sup>8</sup> It may be possible to avoid the need for roading across the ridge if vehicular access can otherwise be gained to the “Waitangirua Community” development areas – such as from Arahura Crescent.

alignment and width to reduce earthworks including low cut and fill heights, avoid highly visible infrastructure components (such as lighting), and predominantly conceal the roading with vegetation, (integrated into planting in adjacent wider areas), in order to maintain SAL values.<sup>9</sup>

- 17 With regards to the middle access road proposed in the draft Structure Plan off the Waitangirua Link Road, it may be possible to alter the route to locate the road to the east of the main spur in this area. This would avoid the very steep and complex topography which sits above the link road and is highly visible from the road, on leaving the district.<sup>10</sup> Roading in this area would likely require substantial earthworks, and these could adversely impact SAL values. (An amended route for investigation is suggested in Appendix 1 to this Reply).

#### **Question from Commissioner Williams during the hearing – further response**

- 18 During the hearing Commissioner Williams asked a question about the landscape comparisons which could be made between SAL 004 Cannons Creek (the subject of the Silverwood team’s request for a zone change from Rural to FUZ) and SAL005 Belmont Hills (which includes the Judgeford Hills FUZ in the notified PDP).
- 19 With the benefit of further analysis post-hearing, a relevant distinction to consider is that the area identified for the Judgeford Hills FUZ in the PDP inside SAL005 Belmont Hills, will not require an access road through

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<sup>9</sup> Connectivity between east and west parts of the site across the ridge could be provided through walking tracks instead, as suggested during the hearing by Ms Black, urban design specialist for Council.

<sup>10</sup> The area is identified in the draft Structure Plan Constraints analysis as “very steep land, not suitable for development.” Refer to page 4 “Constraints” in Appendix 1 to the Silverwood team’s submission.

the most elevated parts of SAL005,<sup>11</sup> as is proposed by the draft Structure Plan for the Silverwood site in SAL004 Cannons Creek. This means there is likely to be less impact from roading on SAL values relating to natural landscape (such as on the predominantly unmodified landform) in SAL005 Belmont Hills, than in SAL004 Cannons Creek (with the draft Silverwood Structure Plan as currently shown). Noting that I was not involved in the decision to apply the Judgeford Hills FUZ to the Belmont Hills, and have not carried out a detailed assessment of effects on SAL values, I consider this distinction to be relevant. (I am aware from Ms Sweetman, however, that this area has been identified for development for some time.)

## **MATTERS RAISED IN ORAL EVIDENCE**

### **Extent of development likely in SAL004, with the FUZ as sought**

- 20 Mr. Dawson (as Barrister for the Silverwood team) suggested that there should be no concern that development will occur across the entire extent of the SAL, due to a change in zoning from Rural to FUZ.
- 21 I agree that it will be highly unlikely that development could occur across the entire extent of the SAL, due to the requirements of Appendix 11 (which requires assessment on effects on SAL values, as part of the structure planning process).
- 22 However, the level at which development will be possible inside the SAL while maintaining and enhancing SAL values will, in my opinion, be very different from development over the entire proposal area in the SAL,

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<sup>11</sup> The "Judgeford Hills Layout Plan - Concept Plan 2018" shows access to the Future Urban Zone from the west, off the Transmission Gully road, rather than from the south, through most elevated parts of the SAL (with the main ridge of SAL005 Belmont Hills being to the south of the Judgeford Hills FUZ). Refer to page 22 of the FUZ Section 32 report, for the Judgeford Hills Layout Plan.

(and as stated in my Evidence, in my opinion will need to be less than shown in the Silverwood draft Structure Plan).

- 23 Ms Blick (planning expert for the Silverwood team), stated in her evidence that the FUZ must be (or be able to become) “predominantly urban”, and there was some discussion as to the meaning of “predominant”, with a further comment made that that could sensibly be taken as comprising an urban coverage of 51% or more.
- 24 The Greater Wellington Regional Policy Statement “test” under which SAL004 qualifies as SAL is “*highly valued, but clearly not exceptional landscape values, in an area where the **natural components**<sup>12</sup> of landscape character dominate*”<sup>13</sup>. Predominant urban development in the proposal area inside the SAL could call into question the SAL overall – in terms of its notified boundary. This is because, while SALs can include different values in different parts, (as is true for all landscapes), predominant urban development at the proposal site would likely be at a sufficient scale (in relation to the SAL overall), to raise a question on the site’s continued contribution to SAL values. The proposal site occupies roughly one third of the SAL.
- 25 Dominance of built form over natural components will relate to both quantitative and more qualitative (perceptual) matters. While percentage cover will be a contributing factor, other design matters will also be relevant – such as bulk (height and footprint) of buildings or groups of buildings/clusters; location of buildings or clusters in relation to natural features (such as fit to landform, or location in more prominent parts of the site); and the design measures (such as methods

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<sup>12</sup> GWRPS emphasis.

<sup>13</sup> GWRPS Policy 27 Identifying special amenity landscapes – district and regional plans: “*special amenity landscapes .... will have, when assessed under the factors listed in Policy 25: (a) highly valued, but not clearly exceptional landscape values, in an area where the **natural components** of landscape character dominate; or (b) highly valued, including exceptional landscape values, in an area where the modification of landscape by human activity is a dominant influence on landscape.*”



to reduce earthworks, fencing types etc.) and level of mitigation proposed (such as planting). How these design matters are addressed in combination will influence the overall urban form achieved, and how this is perceived in relation to the site's natural context (ie the dominance of natural versus built components).

### **Parts of the site suitable for medium density zoning and development**

26 Ms White (urban design expert for the Silverwood team) provided advice on those parts of the draft Structure Plan she considers will be suitable for medium density development, in line with the National Policy Statement on Urban Design, and the associated Medium Density Residential Standards. In summary, Ms White identified the following development areas in the draft Structure Plan, for medium density development:

- Development area 2: Whitby Views: Ms White suggested medium density in this area would be suitable in a more limited way;
- Development area 3: Waitangirua Community; and
- Development area 4: Hilltop Clusters: Ms White identified these areas particularly for some inclusion of duplex or terrace typologies.

27 While I agree with Ms White that it could be possible to provide some denser development in these areas, including development to 2-storeys (and possibly 3 storeys), such development would need to be limited and carefully located, to maintain SAL values. This is due to the typically steep topography, and the extent of earthworks which would likely be required (altering natural landform), to accommodate clusters<sup>14</sup> of medium density Lots, and duplex or terrace typologies;<sup>15</sup> and because

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<sup>14</sup> As shown in the draft Structure Plan.

<sup>15</sup> As suggested by Ms White in the hearing.

of the more prominent visual effects which will likely result from the required earthworks and multi-storey built form.<sup>16</sup>

- 28 In general, (in comparing buildings with the same footprint, location and materiality), buildings at 2 or 3 storeys will be more visually prominent than single-storey buildings, and with more potential for dominance over natural landscape values. This is due simply to increased height/bulk (and noting that integration into the natural landscape through concealment by vegetation could be more difficult with the increased height). Duplex and terrace typologies will have more impact than single-dwellings due to increased bulk, (with footprints being larger), and with larger building platforms likely to be required on the typically steep topography (to accommodate the larger building footprints).
- 29 Further, in my opinion the increased density in some parts would need to be balanced with less development in other parts of the SAL than shown in the draft Structure Plan, in order to maintain SAL values, (for example, development in “Bush Living” areas<sup>17</sup> could be removed or greatly reduced, to address the built form/natural landscape balance across the site.)
- 30 Overall (and in summary), while I consider that there is potential for urban development inside the SAL, development to the extent shown in the draft Structure Plan – and particularly with the inclusion of medium density development to the proposed Medium Density Residential

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<sup>16</sup> Recognising that the Structure Plan is in draft form only - I note that some areas shown as “Whitby Views” appear to be inconsistent with the constraints analysis (as shown on page 4 of Appendix 1 to the submission). (The areas referred to are included in the IGL mapping in Appendix 1 of areas best avoided to maintain SAL values.)

<sup>17</sup> Dwellings in these more elevated and highly visible parts of the site (“Bush Living” in the draft Structure Plan), will require earthworks across slope-faces for access (driveways), in addition to those needed for public access roads and building platforms – adding to the extent (and visibility) of development across the SAL. While planting can be included to conceal development, it will likely take some time to achieve concealment, as slopes are currently in pasture, and (typically) are fairly exposed.

Standards, would risk creating an area inside the SAL with an overall character more recognisable as “residential” than “natural”. Given the size of the proposal area relative to the size of the SAL, this could well call into question the qualifying status of the notified boundary for SAL004 Cannons Creek, as identified in accordance with the GWRPS.

**Date:** 27 July 2022



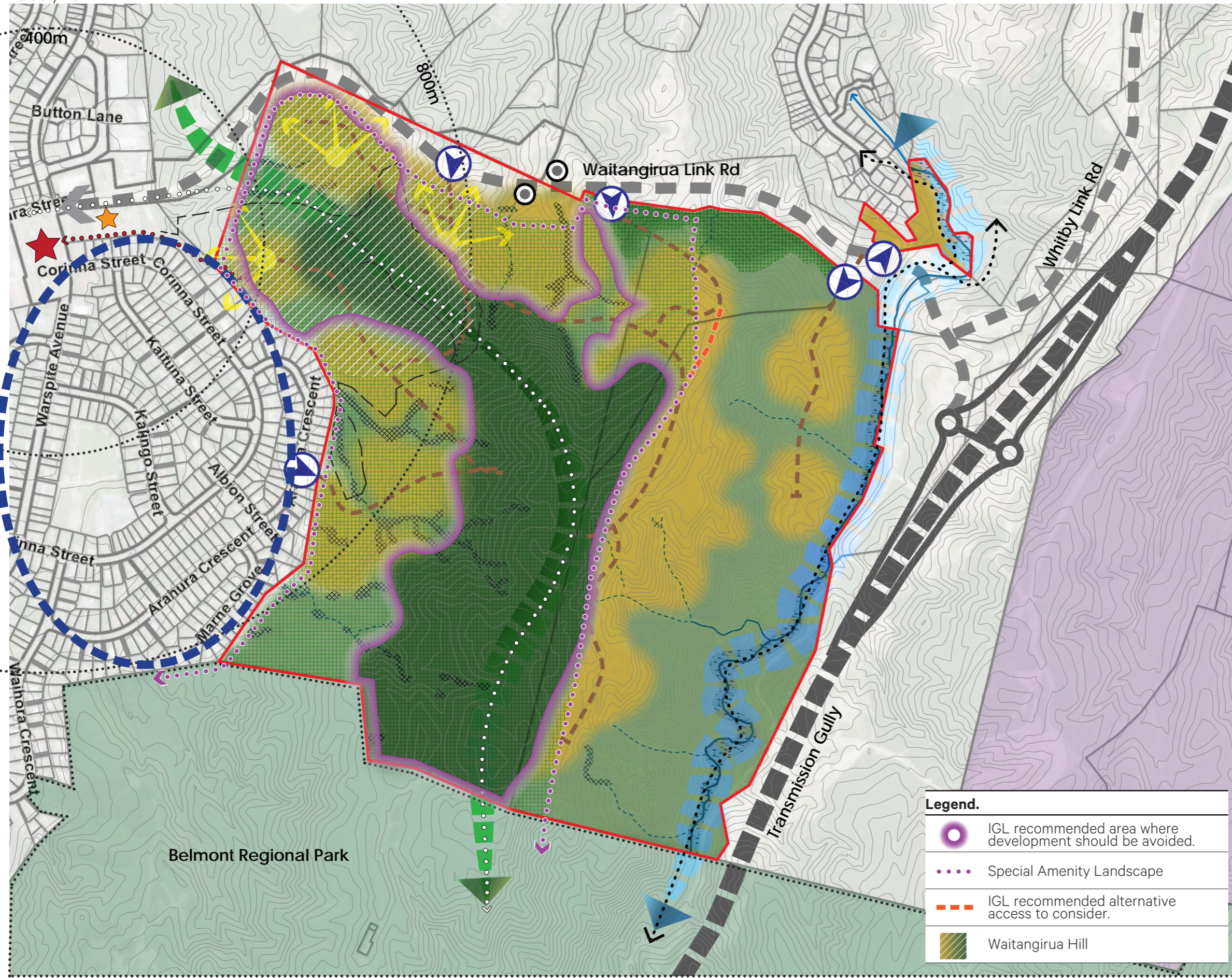
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# Appendix 1 - Reply to Hearing Stream 5 of Rose Armstrong -IGL.

26 July 2022

PCC - Submission Number - 172

## opportunities



- ★ Marae
- ★ Waitangirua local centre - expanded and revitalised
- ⊙ Porirua Development - Kainga Ora - revitalising Eastern Porirua
- Public Reserve
- Future Urban Zone
- protect landscape value of ridgeline
- protect wetland/riparian areas or leave steep slope to regenerate as native bush
- potential development areas
- internal connectivity - driving/walking/cycling
- link to marae and Waitangirua town centre
- ⊙ potential access points
- potential bus stop
- ↕ northern/western aspect, providing good solar gain and coastal views
- ▬▬▬▬ Belmont/Cannons Creek Ridge/Whitby West native bush corridor
- ○ ○ ○ ridgeline walk, potential to connect to Bothamley Path
- ▬▬▬▬ Belmont/Duck Creek/Porirua Harbour ecological corridor
- Duck Creek to Porirua Harbour pedestrian and cycle link
- protected drainage corridor - stormwater treatment
- ▬▬▬▬ establish riparian margin
- existing farm tracks
- ▬▬▬▬ potential access route

**Legend.**

- ⊙ IGL recommended area where development should be avoided.
- Special Amenity Landscape
- ▬▬▬▬ IGL recommended alternative access to consider.
- Waitangirua Hill



Client: Silverwood Corporation Limited  
Project No: 20-014

Scale: NTS @ A3  
Date: 20 November 2020

Dwg No: 20-014-05102020-04  
Revision: 03

**DRAFT FOR DISCUSSION**

**Silverwood Rezoning**  
Porirua



Disclaimer: This is a desk top concept sketch only, engineering, traffic and planning advice is required to confirm development yield, compliance and feasibility.