

**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

**Statement of evidence of Stephanie Louise Blick on behalf of Silverwood
Corporation Limited (Planning Evidence)**

Date: 20 June 2022

INTRODUCTION

1. Ko Stephanie Blick tōku ingoa. I am the Director and Principal Planner of Scope Planning Limited, based in Wellington. Prior to this, I was the Planning Manager at Egmont Dixon Limited.
2. I have prepared this statement of evidence on behalf of Silverwood Corporation Limited (**Silverwood**) in respect of the planning matters arising from its submission (Submitter Ref: 172) and further submissions (Further Submissions Ref: 34) on the Proposed Porirua District Plan (**PDP**).
3. Specifically, this statement of evidence addresses:
 - a) The appropriateness of the Silverwood and Landcorp sites for inclusion in the Future Urban Zone (**FUZ**);
 - b) Areas of disagreement with Council's reporting officer and experts, being:
 - i. Application of Policy FUZ-P1;
 - ii. Special Amenity Landscape characteristics;
 - iii. Density and extent of residential development;
 - iv. Cultural values; and,
 - v. Strategic directions and National Policy Statement for Urban Development.
 - c) Areas of clarification, being:
 - i. Support of the submission by Pāmu (Landcorp Farming Limited)
 - d) Greater Wellington Regional Council's further submission in opposition.
4. I was the author of the Site Evaluation and Rezoning Report that formed part of the Silverwood submission, and I was the author of the Silverwood further submissions document.

5. I am authorised to provide this evidence on behalf of Silverwood.

QUALIFICATIONS AND EXPERIENCE

6. I hold a Bachelor of Science Degree from Victoria University of Wellington and a Bachelor of Social Science Degree (with first class honours) in Resource and Environmental Planning from Waikato University.
7. I am an Associate member of the New Zealand Planning Institute, and I am also a member of the Resource Management Law Association.
8. I have over 15 years' experience in the field of resource management with extensive experience in land development projects. I am familiar with Porirua City, through my professional experience and having grown up in the area.
9. Recent experience within Porirua City includes:
 - a) Project planner responsible for the preparation of the site evaluation report and coordination of accompanying technical reports relating to the rezoning of the 'Plimmerton Farm' site in Plimmerton. The reports prepared for Plimmerton Developments Limited assisted in informing Porirua City Council's decision to include the site as a new growth area in the Porirua City Growth Strategy 2048. I was also involved in the preliminary stages of the development of the Plimmerton Farm Streamlined Plan Change before taking parental leave.
 - b) Project planner on behalf of KM and MG Holdings Limited responsible for the preparation and lodgement of resource consents for the Plimmerton Farm development.
 - c) Project planner on behalf of Te Rūnanga o Toa Rangitira (**Ngāti Toa**) for the Kenepuru Landing development in Kenepuru.
 - d) Project planner on behalf of Porirua Adventure Park Limited Partnership for the Porirua Adventure Park development.

- e) Peer reviewer of the Porirua City Council and Greater Wellington Regional Council land use, subdivision and discharge permit applications for the development of 'Silverwood Lot 3' (now named Talima Estate) on Navigation Drive in Whitby.
10. I am also currently engaged by Porirua City Council in a project coordination role on the Proposed Northern Growth Area Plan Variation to the PDP.
11. I am familiar with the site and its surroundings having visited various parts of the site several times during the preparation of the submission and this evidence.

Code of conduct

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

SUMMARY

13. I have been asked by Silverwood to provide planning evidence in relation to its submission and further submissions on the PDP. The submission requests that the following allotments between the Waitangirua and Te Ara Nui o Te Rangihaeata (formally The Transmission Gully Motorway) be re-zoned from General Rural Zone ("**GRZ**") to FUZ:
- a. Lot 6 North (Sec 9 SO475749, 1.5Ha),
 - b. Lot 6 South (Sec 10 SO475749, 42.3Ha),
 - c. Lot 1 South (Sec 7 SO475749, 8.3Ha)

- d. 90 Arahura Crescent or the “Landcorp site” (Lot 2 DP 389024 and Lot 34 DP 29428, 62.19ha)

14. My statement of evidence addresses:

- a. Application of Policy FUZ-P1;
- b. Special Amenity Landscape characteristics;
- c. Density and extent of residential development;
- d. Cultural values;
- e. Strategic directions and National Policy Statement for Urban Development;
- f. Pāmu support for the submission; and
- g. The GWRC submission in opposition to the Silverwood submission.

15. In summary, relying on the technical reports accompanying the Silverwood submission, and the evidence of Mr Thompson and Mr Hudson, it is my opinion that:

- a. FUZ is an appropriate zone for the site given site attributes and considerations as well as being identified as a growth area in the Porirua Growth Strategy 2048 (**the Growth Strategy**).
- b. The rezoning of the site to FUZ aligns with the purpose of the FUZ as set out in the PDP, and in particular in Objective FUZ-O1 and the criteria set out in Policy FUZ-P1.
- c. The future structure planning process, as enabled through the FUZ provisions and Appendix 11 of the PDP, will ensure that any adverse effects on the identified values of the SAL can be avoided, remedied or mitigated.
- d. The FUZ provisions and associated structure planning process does not imply a blanket rezoning to a residential zone. The

comprehensive structure planning process that addresses the matters set out in Appendix 11 can appropriately identify areas suitable for residential development, as well as associated open space, recreation areas / opportunities and roading connections.

- e. The matters set out in Appendix 11 will enable cultural values of the site to be identified and addressed as part of the future structure plan and plan change process.
 - f. If the site is rezoned to FUZ, a supply and demand assessment will be required to confirm whether or not the proposal would align with the NPS-UD at that time.
 - g. The rezoning of the site is consistent with the relevant strategic objectives of the PDP as well as the relevant objectives and policies of the NPS-UD.
16. It is my overall opinion that the proposed rezoning achieves the purpose and objectives of the FUZ, satisfies the criteria in Policy FUZ-P1 and is consistent with the strategic directions of the PDP, as well as the relevant objectives and policies of the NPS-UD.

SCOPE OF EVIDENCE

17. I discuss the purpose of the FUZ and provide an assessment outlining why FUZ is an appropriate zone for the site, drawing on the reasons why the site is consistent with the relevant PDP provisions and the Growth Strategy.
18. I have read the Council Section 42A Report in detail. While I acknowledge that, there are areas of disagreement concerning economic and landscape matters, these are part of an overall evaluation. Therefore, my evidence addresses the planning matters in response to Council's economics and landscape evidence and Ms Sweetman's assessment of this evidence. In addition, I briefly discuss Ms Sweetman's comments with respect to cultural values.
19. Specifically, my evidence addresses:

- a. Appropriateness of the site for FUZ.
 - b. Areas of disagreement with Council, being:
 - i. Meeting the criteria in Policy FUZ-P1 – Identifying Future Urban Areas;
 - ii. Special Amenity Landscape characteristics;
 - iii. Density and extent of residential development;
 - iv. Cultural values;
 - v. Consistency with the strategic direction objectives of the PDP and the National Policy Statement for Urban Development (**NPS-UD**).
 - c. Areas of clarification being Pāmu (Landcorp Farming Limited) support; and,
 - d. GWRC's further submission in opposition.
20. My evidence is accompanied by the following attachments:
- a. Attachment One: Pāmu letter of support
 - b. Attachment Two: Judgeford Hills Development Concept
21. In forming my planning conclusions, I have drawn on the assessments and evidence of Silverwood's other expert witnesses:
- a. Adam Thompson in relation to economics; and,
 - b. John Hudson in relation to landscape architecture.
22. Key documents that I have consulted or drawn on in preparing this evidence are:
- a. Silverwood's original submission;
 - b. Silverwood's further submissions;

- c. Council’s Section 42A Report prepared by Ms Gina Sweetman that includes recommended amendments to the FUZ chapter and Appendix 11;
- d. Council’s Section 32 Report on the Future Urban Zone;
- e. Council’s Part 1: Overview to s32 Evaluation to the PDP Report
- f. The following statutory planning instruments:
 - i. The Resource Management Act 1991;
 - ii. The National Policy Statement on Urban Development 2021;
 - iii. The Regional Policy Statement for the Wellington Region 2003; and,
 - iv. The Porirua Proposed District Plan.
- g. The following non-statutory planning instruments:
 - i. The Porirua Growth Strategy 2048 and associated implementation documents.
 - ii. The Wellington Regional Growth Framework 2021

EVIDENCE

Appropriateness of the site for Future Urban Zone

23. This section of my evidence summarises my original assessment that the FUZ is an appropriate zone for the site. First, I assess the proposed rezoning against the purpose of the FUZ as set out in Objective FUZ-O1, and then I assess the proposed rezoning against the criteria set out in Policy FUZ-P1. Policy FUZ-P1 sets clear direction and criteria for Council to rezone land to FUZ and specifically references the Growth Strategy.

Objective FUZ-O1 - Purpose of the Future Urban Zone

24. The National Planning Standard defines the FUZ as –

Areas suitable for urbanisation in the future and for activities

that are compatible with and do not compromise potential future urban use.

25. The Section 32 report for the FUZ chapter of the PDP describes this zone as –

“...a ‘holding’ zone where land can continue to be used for a range of rural activities in the interim but cannot be subdivided, used or developed for urban purposes until the land is rezoned in accordance with a structure plan prepared in accordance with approved guidance. The structure planning approach helps ensure that an optimal type and form of development is achieved, which is enabled through future re-zoning.”

26. And describes the purpose of the zone as follows:

The FUZ responds to a critical need to supply more land in the City for housing and business purposes. This need was confirmed by the Porirua Housing and Business Capacity Assessment Report (HBA) (2019) prepared in accordance with the National Policy Statement for Urban Development Capacity 2016 (NPS-UDC). The NPS-UDC directs councils to ensure that there is sufficient land available for housing and business purposes to help resolve a chronic shortage in housing supply including in the Wellington Region; address inefficiently operating land markets that lead to inflated land values.

27. The Part 1 – Overview to the Section 32 Report for the PDP, outlines how the PDP seeks to give effect to the NPS-UD and states that this includes [my emphasis added] -

- *Introducing a Future Urban Zone for greenfield sites which can be up-zoned following appropriate structure planning and infrastructure capacity becoming available. **As such, the FUZ is intended to help meet both shorter term housing needs and provides a buffer for future needs.***

- *Memoranda of understanding will be entered into with FUZ greenfield landowners to advance up-zoning of their sites. These determine roles and responsibilities for advancing plan changes or major resource consent applications, confirm programme timeframes and procedural matters, and confirm cost recovery mechanisms.*

28. Objective FUZ-O1 sets out the purpose of the FUZ as follows:

The Future Urban Zone allows for the continued operation of existing activities and the establishment of new primary production, rural use activities and development that does not compromise the potential of:

1. *The Judgeford Hills and Northern Growth Area to accommodate integrated, serviced and primarily residential urban development;*
2. *The Judgeford Flats area to accommodate integrated, serviced and primarily industrial urban development; and*
3. *Any other areas that have been subsequently included in the Future Urban Zone, and are able to accommodate integrated and serviced urban development.*

29. The Silverwood submission sought to include the site in clause one of this objective.

30. In the *Site Evaluation and Rezoning Report* I set out the rationale for rezoning the site as follows:

The Site is located within the Rural Zone of the District Plan and the Proposed Plan. The Rural Zone provisions in the Proposed Plan only permit the use of the site for rural based activities and does not provide for residential growth in this area that is envisaged in the Growth Strategy. Therefore, it is considered that the current and continued / proposed rural zoning is not appropriate for the city's growth aspirations, is not in line with the Growth Strategy nor is it

appropriate for the development aspirations sought by the landowners.

31. With respect to the rural based activities occurring on the Landcorp site, the site is farmed by GWRC with a significant area of the Belmont Regional Park. It is understood that this arrangement is only in place until the Crown sells the property, either to Ngāti Toa or on the open market.
32. With respect to Silverwood, most of the vegetation on the site are wilding pines and regrowth of the pre-1990 forest severely damaged by storms in 2003. Silverwood had engaged a company to harvest the balance of trees some years ago but, due to the construction of the Waitangirua link road limiting access, this was not undertaken.
33. The Site does not contain highly productive soils, being soils with a Land Use Capability class rating between 1 – 3.
34. Therefore, activities occurring on the site could be described as ‘holding activities’ until such time as the Site is rezoned and urban development occurs.
35. It is my view that, drawing on the technical assessments included in the Silverwood submission, urban development on the site is appropriate given the following site attributes and considerations:
 - a. Development can accommodate a variety of housing types and varieties including medium density, papakainga, large lot residential and rural lifestyle.
 - b. Through the construction and operation of the Waitangirua Link Road, new communities developed within the Site will be well connected with established neighbourhoods, the Porirua City CBD as well as the Waitangirua town centre. In this respect, the Site is two-kilometres from the Porirua CBD and is accessed from the Waitangirua Link Road which has been identified in the Growth Strategy as a future public transport route “Potential West-East Public Transport”.

- c. Development can occur on the site in a way that will recognise and protect the social, economic, cultural and environmental benefits of Te Ara Nui o Te Rangihaeata that is identified as regionally significant infrastructure.
- d. Development will not generate adverse reverse sensitivity effects on retained rural land. In this respect, the Site is not bound by any Rural Zoned land.
- e. Development can occur in such a way that does not require amendment to, or removal of, any of the PDP overlays including the identified SNAs and SAL. Rather, the Draft Structure Plan included with the submission sought to integrate these features with future development.
- f. Development has the potential to complement the Eastern Porirua Regeneration Project and there may be opportunities to resolve infrastructure issues associated with the regeneration project as part of the development.
- g. As detailed in the Infrastructure Report accompanying the Silverwood submission, development can be serviced by an extension of existing infrastructure and the installation of new on-site infrastructure.
- h. Development can occur on the Site without adversely impacting the national grid corridor and gas pipeline that spans the Site. In this regard it is noted that Transpower did not lodge a submission in opposition to the proposed rezoning.
- i. Development can align with the values that Ngāti Toa holds in relation to the Site, and more broadly, the Eastern Porirua area. These values are further detailed in their letter of support provided with the submission.
- j. Development will be adjacent to the Belmont Regional Park which will provide a key recreational opportunity to enhance access to this park for existing residents of Waitangirua and future residents

of the development. The Toitū Te Whenua Parks Network Plan 2020-2030 prepared for the park identifies opportunities to improve access from adjacent residential areas.

- k. Development can appropriately respond to the SAL located on the Site. Further refinement of the structure plan that incorporates the recommendations in the Landscape Evaluation, will seek to ensure the values of the SAL are maintained.
 - l. The assessments undertaken to date confirm that the Site can accommodate an integrated, serviced primarily residential urban development.
36. In summary, for the reasons identified above and outlined in detail in the submission, urban development is appropriate on the Site, and for this to occur, a change in zoning needs to occur, and the FUZ is the most appropriate zone to facilitate this.

Policy FUZ-P1 – Identifying Future Urban Areas

37. Policy FUZ-P1 is the most critical policy to consider with respect to the submission, because it sets a clear direction and criteria for Council to consider rezoning sites to FUZ.

38. Policy FUZ-P1(1) seeks to –

Identify areas for future urban development as the Future Urban Zone where these:

1. Are consistent with the Porirua Urban Growth Strategy 2048 (2019); and

a. Avoid significant adverse effects and avoid, remedy or mitigate any other adverse effects on the identified characteristics and values of any areas identified in SCHED9 - Outstanding Natural Features and Landscapes, SCHED7 - Significant Natural Areas, SCHED11 - Coastal High Natural Character Areas and SCHED10 - Special Amenity Landscapes; and,

b. Will not result in an increase in risk to people's lives and properties within any area located in a Natural Hazard Overlay or a Coastal Hazard Overlay; or

39. It is my view that the Site is subject to clause 1 of this policy as it is consistent with the Growth Strategy.
40. Silverwood lodged a submission on the draft Growth Strategy for the Site to be included as a future growth area and presented at the Council feedback meetings. Council accepted the submission and the Site was subsequently identified in the Growth Strategy as a *"Potential Residential Area – Medium Term"*. It is located adjacent to the Waitangirua Link Road which is identified in the Growth Strategy as a future public transport route *"Potential West-East Public Transport"*.
41. The other residential areas illustrated on the Spatial Framework are identified as *"New Residential Area – Medium Term"*. There is no explanation included in the Growth Strategy or background documents explaining the difference, if any, between *"Potential Residential Area – Medium Term"* and *"New Residential Area – Medium Term"*. The mere inclusion of the Site in this map means that the site is consistent with the Growth Strategy. In other words, it is my view that for a site to be 'inconsistent' with the Growth Strategy, the site would not be included on this map.
42. In addition, unlike the other residential growth areas, in the Residential Areas section of the Growth Strategy, the Site is specifically discussed [my emphasis added] –

*"Our urban boundary will be extended in the east from the Lanes Flat interchange in the north, to Kenepuru in the south and between Waitangirua/Cannons Creek to the Transmission Gully Motorway (TGM) (with the exception of Judgeford Hills). **This means land to the east of Whitby/Waitangirua and Cannons Creek up to Transmission Gully Motorway can be considered for residential zoning through the Proposed District Plan review.**"*

43. The above statement explicitly states that the Site (being land to the east of Whitby/Waitangirua up to Transmission Gully Motorway) can be considered for residential zoning through the District Plan review.
44. The Growth Strategy sets out six principles and associated directions. Relevant to the rezoning of Site to FUZ, the Growth Strategy includes the following key directions:
- *Plan for neighbourhoods that encourage a diverse range of living options for people that rent, and for people that own their own homes.*
 - *Integrate design principles that reflect the diversity of Porirua, including the place of Ngāti Toa.*
 - *Encourage development of homes that match our communities' changing preferences, with a range of options – including standalone, medium density and high-density housing.*
 - *Ensure sufficient land is available to meet the need for regeneration and for developing new communities and do this in a way that works with and enhances the health of our natural environment.*
 - *Make walking, cycling, and public transport choices for more people of varying abilities.*
 - *Improve safety for pedestrians and cyclists as well as other transport network users, to eliminate death and serious injury.*
45. As further detailed in the Silverwood submission, these directions were considered through the development of the Draft Structure Plan.
46. For the reasons outlined above, the rezoning of the site will be consistent with the Growth Strategy and is therefore subject to clause 1 of policy FUZ-P1.
47. With respect to clause 1(a), it is acknowledged that the rezoning of the

site may give rise to a number of different potential effects. The rezoning would result in the loss of rural land which is only partially used for land-based activities but would allow for the urban growth identified as necessary in the Growth Strategy (which gives effect to NPS-UD requirements). As such, there are also a number of positive economic and associated social wellbeing effects that the rezoning would give rise to.

48. Through the assessment and analysis work undertaken as part of the submission, the project team experts identified that there are also a number of actual and potential environmental effects anticipated from the rezoning including the ecological, landscape, amenity, infrastructure and servicing, stormwater management, geotechnical and land stability, transportation and urban design effects. Based on these assessments and the subsequent development of the Draft Structure Plan, the experts concluded that many of the potential significant adverse effects associated with development of the Site can be avoided, and where they are unable to be avoided, can be mitigated to an acceptable level.
49. With respect to the SAL that is located over a portion of the site, the Landscape Evaluation outlines the measures that have been incorporated into the Draft Structure Plan and further recommendations for the future structure planning process to ensure that adverse landscape, visual and amenity effects, are avoided or mitigated. The measures include the distribution of built development, density, retention of open space across valued landform and vegetation, location of roads and native vegetation restoration on retired land. Mr Hudson concludes in para 49 of his landscape evidence that –

With particular reference to Policy FUZ-P1, that sets out the criteria for identifying FUZ sites, for the reasons outlined in this evidence, it is my view that the future structure planning process as enabled through the FUZ provisions and Appendix 11 of the PDP, will ensure that adverse effects on the identified values of the SAL can be avoided, remedied or mitigated.

50. With respect to the SNAs located within the site, the Ecology Report that accompanied the submission concludes that –

Many of the constraints and potential adverse ecological effects identified above can be avoided, mitigated (minimised) or remedied, with any significant adverse residual effects remaining being offset through onsite restoration activities. General elements that should be considered in the further development of the structure plan to manage potential effects on ecological values include:

- 1. Permanent protection of SNAs and other ecologically important habitats by way of vesting in public agencies, joint private ownership through some type of body corporate or other communal ownership structure, or covenant registered against the titles of individual Lots;*
- 2. Pest and weed control measures;*
- 3. Planting using native species to establish shrubland and forest on priority areas, including watercourses and buffers surrounding SNAs; and*
- 4. Best practice stormwater design including incorporation of water sensitive design measures.*

51. And –

From our involvement in the preparation of the draft Structure Plan, and from our knowledge of the site and its ecological values, we are of the view that the development of the subject site can be undertaken at an appropriate level and layout that protects important ecological values.

The development of the site offers the opportunity to significantly enhance degraded ecological values, that may not occur under the current land use. Overall, there a range of accepted management tools, and available opportunities on the site to appropriately address, and where necessary offset, the potential adverse ecological effects associated with the proposed concept rezoning and Masterplan development designs.

52. Based on the assessment undertaken by RMA Ecology, it is my view that development of the site in a manner outlined in the Draft Structure Plan and as further refined taking into account the recommendations included in the Ecology Report has the potential to provide residential development at a range of densities that can avoid, remedy and/or mitigate potential adverse effects on the ecological values of the site.
53. With respect to clause 1(b), there are flood hazard inundation and overland flow-path areas located within the Pāmu Landcorp site. These areas have been identified as ‘drainage protection corridors’ on the Draft Structure Plan and the proposed development areas are located outside of these areas. Therefore, the draft structure plan avoids placing people / development in high-risk areas.
54. Subject to the risk-based natural hazard provisions of the PDP, any development will seek to avoid natural hazards, or where hazards can’t be avoided, reduce the risks associated with such hazards. With respect to the potential for climate change to cause or exacerbate natural hazard events, this will need to be taken into account in line with current NRP and building code requirements. The Site is far enough away from the coastal environment to not be susceptible to anticipated sea level rise.

Wellington Regional Growth Framework

55. While I note that the Wellington Regional Growth Framework 2021 (“**the Framework Plan**”) doesn’t include the Silverwood site, this plan specifically outlines that:

“the Framework includes developments with regional scale only:

- *Future Urban Area (greenfield) developments, generally over 1000 new dwellings.”*

56. Silverwood’s submission to the Porirua Growth Strategy relating to the Silverwood site only (i.e. not the Landcorp) site provided an indicative yield of 200 household units.
57. I also note that the Framework Plan does not state that it supersedes, or trumps growth strategies prepared by territorial authorities. To the

contrary, *Diagram 4: Relationship between the Framework and other documents* illustrates that both the Framework Plan and Council Growth Strategies contribute to the Future Development Strategy required under the NPS-UD.

Summary

58. On the basis of the above, and further detailed technical assessment included in the submission, it is my view that the proposed rezoning of the site to FUZ is consistent with the criteria set out in Policy FUZ-P1.

59. Further, the exclusion of the site from the Framework Plan should not preclude rezoning of the site.

60. If the Panel were to disagree with my view that clause 1 is applicable and that the rezoning is subject to clause 2 instead, I agree with the following conclusions reached by Ms Sweetman (para 328) -

“In respect of the criteria contained in FUZ-P1 for inclusion of additional sites as Future Urban Zone, I consider that generally the Silverwood site could be considered for inclusion”

61. For completeness, with reference to clause 2 of FUZ-P1, it is my view that the technical reports provided with the submission together with the evidence of Mr Hudson and Mr Thompson confirm that the site is of a size, scale and location which could accommodate comprehensive and integrated future development that -

- a. Is serviced by infrastructure that could be agreed via a formal agreement between the landowner and the Council;
- b. Is connected to the transport network;
- c. Avoids significant adverse effects and avoids, remedies or mitigates any other adverse effects on the identified characteristics and values of any areas identified in SCHED9 - Outstanding Natural Features and Landscapes, SCHED7 - Significant Natural Areas, SCHED11 - Coastal High Natural Character Areas and SCHED10 -

Special Amenity Landscapes; and

- d. Will not result in an increase in risk to people's lives and properties within any area located in a Natural Hazard Overlay or Coastal Hazard Overlay.

Areas of Disagreement

- 62. The following sections seek to address areas of disagreement with Council, being:
 - a. Meeting the criteria in Policy FUZ-P1 – Identifying Future Urban Areas;
 - b. Risks to Special Amenity Landscape Characteristics and Values;
 - c. Appropriateness of Urban Development;
 - d. Impacts on cultural values; and,
 - e. Consistency with the strategic direction objectives of the PDP and the NPS-UD.

Policy FUZ-P1 – Identifying Future Urban Areas

- 63. In para 180 of the s42A Report, Ms Sweetman sets out the process for identifying future urban areas as follows:

“FUZ-P1 sets out the criteria for identifying areas for future urban development as the Future Urban Zone. There are two ways land can be zoned as Future Urban Zone. The first is that it is consistent with the Growth Strategy and meets relevant criteria in respect to any Overlays on the land. The second is where the land is of a size, scale and location that could accommodate future development.”

- 64. In relation to the Judgeford Hills site, in para 180 of the s42A report, Ms Sweetman states that:

“Judgeford Hills sits in the first category. That is, it is identified in the Growth Strategy as a new residential area in the medium

term.”

65. However, in relation to the Silverwood site, Ms Sweetman states in para 310 of the s42A report:

“The Silverwood site is identified in the Porirua Urban Growth Strategy 2019 (Growth Strategy) as a “potential residential area – medium term”. The Growth Strategy does not address why this has been identified as potential. The Future Urban Zone section 32 evaluation report also does not address why this land was not included in the Future Urban Zone. Accordingly, in my opinion, it is not subject to clause 1 of FUZ-P1. I consider it is appropriate to evaluate the potential zoning of the site as Future Urban in accordance with clause 2 and recommended clause 3 of proposed FUZ-P1.”

66. I disagree with Ms Sweetmans’ view that the site is not subject to Clause 1 of FUZ-P1. There is no explanation in either the Growth Strategy or the s32 analysis for the distinction between “new” and “potential” residential areas. Indeed, no distinction at all may be intended, and as I have said above, the Site is discussed within the Growth Strategy as being suitable for development.
67. On the basis of the above, it is my conclusion that Policy FUZ-P1(1) is the relevant policy to determine whether the site shall be rezoned to FUZ. An assessment of the proposed rezoning against this policy is provided in paras 38-57 above.

Special Amenity Landscape Characteristics and Values

68. In para 19 of her evidence, Ms Armstrong states that, in her opinion, there would be risks to the SAL characteristics and values in re-zoning to FUZ as proposed.
69. Ms Armstrong then proceeds to state that *“it is unclear from the proposal what the intended future zoning would be, for the Structure Plan”*¹ and that *“it is logical to assume that the FUZ would preclude a zone change to*

¹ Para 20, Evidence of Ms Rose Armstrong

rural residential activities, given its primary purpose for urban/residential development”².

70. The evidence of Ms Armstrong was reviewed by Mr Hudson in his expert landscape evidence. In response, at para 30 of his evidence, Mr Hudson states that -

30 In my opinion, as outlined in my Landscape Evaluation, there is also potential for urban development in parts of the SAL while maintaining its characteristics and values. For example, the northern basin, and areas east of the ridgeline have potential as they are mostly screened by existing landform.

71. And in para 31 –

31. Enhancement of other values can also be achieved by protecting more sensitive areas and providing for open spaces, revegetation, recreation, and connectivity. This would be done at the rezoning stage with development of a structure plan but is not appropriate at this FUZ stage.

32. Mr Hudson then outlines that the Draft Structure Plan should be refined and finalised and the structure plan, together with associated provisions and siting of infrastructure, should aim to:

- *Maintain the prominent unmodified ridgeline, and ensure it is free from incongruous structures.*
- *Avoid development within deep gullies and promote revegetation of these waterways and wetlands.*
- *Encourage development that is low impact, integrated and designed sensitively in response to the existing terrain to limit prominence.*

² Para 21, Evidence of Ms Rose Armstrong

- *Maintain open space as a characteristic land use.*
- *Enable public access through networks across the site and along the ridge.*

33. In paras 37 – 42 of his evidence, Mr Hudson goes on to describe how the identified values of the SAL were considered in the development of the Draft Structure Plan and how these values can be appropriately reflected in the future structure plan. Mr Hudson concludes in para 49 of his evidence that -

49. I am confident that a bespoke layout with appropriate development densities, which maintain and enhance landscape and amenity values (as required in the NFL objectives and policies), can be achieved through the future structure plan and plan change process provided for FUZ land in the PDP. With particular reference to Policy FUZ-P1, that sets out the criteria for identifying FUZ sites, for the reasons outlined in this evidence, it is my view that the future structure planning process as enabled through the FUZ provisions and Appendix 11 of the PDP, will ensure that adverse effects on the identified values of the SAL can be avoided, remedied or mitigated.

50. Lastly, I note that Ms Armstrong stated that -

In my opinion, the proposed cluster approach, even with the inclusion of smaller lot sizes²⁰ than provided for in other SAL by the PDP, has potential to achieve a good landscape outcome for the SAL.

51. There appears to be agreement between Ms Armstrong and Mr Hudson that clustered development is an appropriate mechanism to maintain landscape values. As further detailed in Section 7.2 of the *Site Rezoning and Evaluation Report*, the clustered development approach led to the identification of five distinct development areas in the Draft Structure Plan. These development areas respond to the sites varying capacity for

accommodating development and this capacity was determined by a number of factors including:

- Topography/gradient
- Proximity (to existing urban area, transport infrastructure etc.)
- Visual/landscape sensitivity

52. Section 7.2 of the *Site Rezoning and Evaluation Report* goes on to state that clustered development will also ensure (my emphasis added):

- *The integration of built form and landscape*
- ***The protection of the landscape value of the elevated areas of the site***
- *The creation of a variety of residential and lifestyle options, including the provision of comprehensively higher density typologies and papakainga housing concentrates development in areas with the best aspect and least constraints by grouping dwellings together*
- ***Large ('residual') areas of natural open space are retained and can be utilised for public recreation***
- ***The sensitive placement of house platforms/clusters and landscape controls to promote visual integration***
- *Landscape values are maintained whilst achieving feasible development opportunities*
- *Capital costs are reduced through reduced infrastructure per lot/unit;*
- *Opportunities for social interaction, a heightened sense of community and sense of security are promoted.*

53. Lastly, I note that, in the cost benefit analysis of the FUZ objectives and policies in the Section 32 Report for the FUZ chapter, the author states

the following as an environmental benefit³ –

“Plan provisions relating to protection of SNAs, SALs and historic and cultural heritage will protect these values where they exist in FUZ areas”

54. Therefore, in my opinion, given the presence of SAL’s on proposed FUZ sites, together with the above statement, the mere presence of an SAL on a site should not preclude the site from being rezoned to FUZ.
55. In summary, in relation to the landscape related concerns raised by Ms Armstrong, I agree with Mr Hudson’s conclusion outlined above, and therefore disagree with Ms Armstrong’s view that there would be risks to the SAL characteristics and values if the Site was rezoned to FUZ.

Density and Extent of Residential Development

56. Ms Armstrong, in para 15.1 of her evidence states that –

“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”

57. It is unclear, based on my review of the FUZ chapter, Appendix 11 and relevant Section 32 reports, what provisions in particular have led Ms Armstrong to assert that the FUZ anticipates a *“comprehensive landscape character change”*.

58. In Ms Armstrong para 15.2 of her evidence states that –

“The Landscape Evaluation of the Draft Structure Plan¹¹ 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.”

59. Ms Armstrong also states in para 31 that *“smaller lot sizes are proposed than applying in other SALs.”*

60. In para 323 of the s42A report, Ms Sweetman agrees with the concerns

³ Page 55

raised by Ms Armstrong in that a full rezoning of the site to FUZ may “send” a message that it is overall suitable for future urban development.

61. While the name itself emphasises future use of the site for *urban* development, there is nothing in the FUZ policy framework, nor the Appendix 11 guidance, that compels or requires the full blanket rezoning of the site to a residential zone. To this end, and as I note above, the National Planning standard defines the FUZ as (my emphasis added) –

*‘Areas suitable for urbanisation in the future **and for activities that are compatible with** and do not compromise potential future urban use.’*

62. In Section 8 of the Section 32 Report for the FUZ chapter, the author states that the National Planning Standard “*accurately describes the purpose of the zone in the Porirua context*”⁴

63. In addition, *Section 4.2 – Section 7 of the RMA* of the Section 32 Report for the FUZ chapter states that (my emphasis added) –

*“The FUZ will enable residential areas **and other complimentary land uses such as open space** which typically feature amenity values that are appreciated by the community and contribute to their desirability as places to live.”*

64. And –

“FUZ areas feature SNAs and SALs, both of which protect environmental qualities that are valued by the community.”

65. Before agreeing with the concerns raised by Ms Armstrong, in para 323 Ms Sweetman notes that –

“..because the PDP currently only includes General Residential and Medium Density Residential does not mean that other residential zonings could not be more appropriate. For instance, the Large Lot

⁴ Page 45

Residential Zone may be considered appropriate”.

66. A recent example of this in Porirua is the development of the Plimmerton Farm Zone Precinct Plan. A comprehensive structure planning process led to the implementation of bespoke clustered and standard residential development provisions of land within the Kakaho Special Amenity Landscape located across a portion of that site. It is assumed, like other District Plans across New Zealand that have adopted a structure plan/development area approach to rezoning growth areas, that similar bespoke provisions can be introduced under the National Planning Standards framework.
67. Regarding, Ms Armstrong’s comment in para 31 that “*smaller lot sizes are proposed than applying in other SALs.*”. I note that the Judgeford Hills Development Concept that informed Council’s decision to rezone the site to FUZ, identifies development of approximately one third of the area that falls within the Belmont Hills Special Amenity Landscape. The concept also includes areas of land that don’t appear to be proposed for residential purposes but are still proposed to be zoned FUZ. Refer **Attachment Two**. Regarding the Northern Growth Area FUZ, I note that the Porirua City Northern Growth Structure Plan (2014) identifies potential rural residential, open space, and deferred rural areas that have now been included in the PDP as FUZ.
68. It is my view that the requirement to develop a structure plan for the site, in line with the Appendix 11 guidance, will ensure that appropriate zoning, coupled with bespoke provisions accompanying the structure plan could be applied to the site. Examples of Appendix 11 matters of relevance that will achieve this include:

Urban Growth

3. *The location, type and form of the urban edge, its appropriateness to the structure plan area and the surrounding area and how transitions between the area to be urbanised and other areas with different activities, building types and densities or levels of intensity are to be managed.*

Natural Resources

3. *The integration of green networks (such as freshwater and coastal water systems, and ecological corridors) with open space and pedestrian and cycle networks, showing how they reflect the underlying natural character values and provide opportunities for environmental restoration and biodiversity*

Use and Activity

4. *A mix and distribution of land uses within the structure plan area, as is appropriate to the area's size and location, to provide opportunities for business activities and employment, community facilities and open space close to where people live.*

Urban Development

2. *A desirable urban form at the neighbourhood scale including all of the following:*
 - a. *A layout providing pedestrian connectivity with a network of streets and block sizes which allow for a choice of routes, particularly near centres and public transport facilities;*
 - b. *Provision of a diversity of site sizes within blocks to enhance housing choice, accommodate local small-scale community facilities and, where appropriate, enable a range of business and mixed-use activities;*
 - c. *Provision of open spaces which are highly visible from streets and of a scale and quality to meet identified community needs;*
 - d. *Appropriate transitions within and at the edge of the structure plan area between different land use activities, intensities and densities; and*

e. The application of an integrated stormwater management approach within developments to reduce impacts on the environment while enhancing urban amenity.

69. Therefore, it is my view that the FUZ does not imply a blanket rezoning to a residential zone, and that a comprehensive structure planning process that assesses the matters set out in Appendix 11 can adequately assess areas suitable for residential development, as well as associated open space, recreation areas / opportunities and roading connections.

Cultural Values

70. Ms Sweetman identified in the Council s42A report that Ngāti Toa lodged a further submission in support of a submission to make the Waitangirua Hill a Site of Significance to Māori (**SASM**).

71. Related to this, in para 330, Ms Sweetman states that –

“There is also question as to whether there are cultural values associated with the site that have not yet been addressed, as raised by Richard Falkner and supported by TROTR.”

72. I am aware that Porirua City Council and Ngāti Toa are advancing a plan variation to identify SASMs. It may be through this process that the values that Ngāti Toa attribute to the Waitangirua Hill site will be determined. It is not appropriate for me to confirm whether or not SASM sites are available to be developed by mana whenua. I understand that a representative of Ngāti Toa will attend the hearing with Silverwood to discuss this further.

73. In direct response to the question raised by Ms Sweetman however, it is my opinion that, irrespective of whether or not Ngāti Toa own land within the FUZ in the future, the matters set out in Appendix 11 will enable cultural values of the site to be identified and addressed as part of the future structure plan and plan change preparation process. In particular, Appendix 11 includes a requirement to provide the following specialist document -

*b. Assessment of effects on the cultural wellbeing of Ngāti Toa
RaNgātira, including mapping of local history and whakapapa;*

74. Specifically in regard to SASM's I also note the following comment in the FUZ Section 32 Report –

There are recognised sites of significance to within and in close proximity to the NGA, and these areas will be managed by the Sites and Areas of Significance to Māori chapter of the PDP.

**National Policy Statement for Urban Development and Strategic Direction
Objectives of the PDP**

75. Ms Sweetman states in para 338 that –

“while there are many merits to rezoning the Silverwood site to Future Urban and some parts of FUZ-P1 are achieved, I consider on balance that its rezoning would be inconsistent with the relevant strategic objectives of the PDP and the NPS-UD.”

76. Earlier in para 333, Ms Sweetman states that -

“my concerns lie with achieving UFD-01 and UFD-02 of the PDP and Objectives 2, 3 and 6 of the NPS-UD, and whether its rezoning would result in an over-supply of Future Urban zoned land. This in turn may impact on housing affordability and competitive land and development markets, impacting on intensification, and being strategic”

77. Before turning to the economic assessment that led Ms Sweetman to this conclusion, I wish to comment on the emphasis that Ms Sweetman has placed on both the strategic directions of the PDP and the objectives of the NPS-UD in reaching her recommendation that the site should not be rezoned to FUZ.

78. The most relevant provisions relating to the submission are the FUZ objectives and policies. Policy FUZ-P1 in particular sets clear direction and criteria for Council to rezone land to FUZ.

79. I also note that, if the site is rezoned to FUZ, as part of any future rezoning plan change process a Section 32 report will be required that evaluates the proposed rezoning against sections 5-8 of the RMA, higher order statutory documents and all relevant objectives and policies of the district plan, including the strategic direction objectives. This view appears to be shared by the author of the Section 32 Report for the FUZ chapter who states in *Section 5.3 Summary of Issues Analysis* under 'Issue 7 - Development within FUZ areas needs to come forward in an environmentally sustainable manner' that-

“the district plan strategic directions set out clear aspirations with respect to climate change mitigation and adaptation, preservation of environmental attributes and values, efficient resource and energy use, and preventing further degradation of water quality in the Porirua Harbour and Catchment.

Future development within FUZ areas has the potential to impact on these attributes and values, and measures will need to be put in place to avoid, remedy or mitigate effects.”

80. And in response to this issue the author states [my emphasis added]:

Future development and re-zoning would be subject to assessment against the District Wide chapters of the PDP. These chapters cover relevant matters with respect to environmental sustainability (within the scope of PCC's functions and powers under the RMA).

81. I have reviewed the Section 32 Report for the FUZ Chapter and it does not appear that the assessment of the appropriateness of the FUZ rezoning for the NGA, Judgeford Hills or Judgeford Flats sites was considered under the strategic direction objectives of the PDP. Likewise, each of these sites' individual contributions to Council adhering to its obligations under the NPS-UD was not accessed in the HBA or Residential Capacity reports that Council have relied on to justify the rezoning to FUZ.

82. Irrespective of my views I have outlined above, and while significant

weighting shall be placed on the criteria in Policy FUZ-P1, I do maintain that the wider PDP provisions are a relevant consideration and therefore I have assessed the proposed rezoning against the strategic direction objectives and NPS-UD objectives below.

Oversupply of Future Urban Zoned Land

83. In Section 7 - *Quantification of Costs and Benefits* of the Section 32 Report for the FUZ chapter the author states -

There are significant economic and social benefits however associated with making more greenfield land available for housing, including growth of the housing market and personal wealth creation, GDP growth, short-term employment opportunities in construction and long-term employment opportunities in services. More greenfield areas will also lead to increased competition in land markets which will assist in moderating the price of land for housing. Greenfield development typically also delivers higher housing yields compared to infill, and coupled with brownfield development will help improve housing choice and affordability.

84. In Section 11.3 of the Section 32 Report for the FUZ chapter, the author states that –

There will be significant economic benefits associated with the ultimate development of FUZ areas in accordance with future rezoning processes. Making more land available for housing and industrial use will help resolve the chronic shortage in housing supply, address inefficiently operating land markets that lead to inflated land values and provide more business land to generate employment and wealth.

85. In order to assess whether or not the proposed rezoning would result in an over-supply of future urban zoned land, Ms Sweetman sought the advice of Mr Phil Osborne.

86. In his report, while identifying a number of positive attributes of the site

including that that its location makes “economic sense as a natural expansion area for Porirua City”, Mr Osborne concludes on page 36 that:

As outlined in the preceding report the current level of realisable capacity facilitated through the Porirua PDP is more than sufficient to meet the city’s projected demand over the longterm (30-year) period. Additionally, the provision of currently unnecessary residential land capacity in greenfield location is coupled with potential costs and risk to the key objectives of the PDP and the NPS UD from which these objectives are based.

As such this report would suggest that (given the information at hand) there is no strong economic grounds by which to rezone this land.

87. In response to this, in para 337 of the s42A report, Ms Sweetman states that she is concerned that the rezoning to FUZ would “open the door to Council receiving a plan change request and lead to the inefficiencies and the material economic costs and negative market outcomes identified in Mr Osborne’s report.”

88. I do not believe Ms Sweetmans concerns are warranted. This is because the Appendix 11 structure plan guidance sets out that the structure plan is to identify, investigate and address, among other things –

1. The future supply and projected demand for residential and business land in the structure plan areas to achieve an appropriate capacity to meet the requirements of the National Policy Statement for Urban Development 2020.

89. And Appendix 11 also sets out that the following specialist document is required:

B(c) Analysis of anticipated land use supply and demand informing the spatial allocation of areas for different activities, intensities and densities.

90. Essentially, as part of the future plan change, a supply and demand

assessment would be required to confirm whether or not the proposal would align with the NPS-UD at that time. Similarly, an assessment of the rezoning against the NPS-UD would be required in the assessment of higher order statutory documents in the Section 32 report that would accompany the plan change.

91. Notwithstanding these future analysis requirements, Adam Thompson was engaged by Silverwood to provide economics evidence in response to the Property Economics report prepared by Phil Osborne.

92. In summary, the findings of Mr Thompson include that:

- a. *The Porirua City Council housing capacity estimates, prepared by Property Economics Ltd, have been based on the incorrect assumption that the PDP and NPS-UD seek intensification as their objective. Instead, the PDP and NPS-UD require a diverse range of factors to be assessed when preparing land use policy. This incorrect assumption has led to the capacity estimates, and supporting analysis, not presenting an economic analysis of house prices under the PDP (para 76).*
- b. *The NPS-UD requires that the price of housing that is supplied and demanded is estimated⁵. This has not been completed and the PDP therefore does not meet the evidential requirements of the NPS-UD (para 77).*
- c. *The economic analysis of the housing market under the PDP can only be assessed by assessing the relationship between housing quantity and housing price, namely the supply and demand curve. This is an economic law that states as the price decreases the quantity demanded increases, and as the price increases the quantity demanded decreases. The PCC capacity estimates consider the quantity of housing however do not consider the price of housing. It is therefore not an economic analysis (para 78)*
- d. *The modelling provided by Mr Health and Mr Osborne confirms that*

⁵ NPS-UD: Objective 2, NPS-UD: Policy 1(a(i)), NPS-UD: Policy 1(d)

infill and development housing under the PDP will not be affordable and will not meet the demand of the majority of the population. This will mean the district will rely almost entirely on greenfield land to meet the future housing needs of the population (para 82).

- e. *A total of 256 dwellings were built each year, on average, over the March 2020-2022 period. This is approximately half (51%) of the 500 dwellings demanded per annum, indicating a further 244 dwellings per annum are required to keep pace with demand (para 83).*
- f. *Of the 256 dwellings built annually, 210 (82%) were on greenfield sites, and 46 (18%) were in infill/redevelopment sites. This shows infill/redevelopment construction has a minor role in dwelling construction, which is a typical infill/redevelopment ratio for small-medium cities. Infill/redevelopment typically only occurs to any significant extent in larger cities that have significant congestion and housing affordability issues (para 84).*
- g. *The construction of 256 dwellings per annum falls short of demand for 500 dwellings per annum (estimated by Porirua City Council) (para 85).*
- h. *Only 46 infill/redevelopment dwellings occurred annually over the past two-year period. Given the PDP does not materially increase the potentially for infill/redevelopment when compared to the ODP (i.e. the infill/redevelopment provisions are in large part the same under both plans) this means that greenfield land will need to account for approximately 454 dwellings annually to keep pace with demand (of 500 dwellings per annum) (para 86).*
- i. *A sample of infill/redevelopment feasibility assessments undertaken by Mr Thompson indicates that the infill and redevelopment properties have a low level of commercial feasibility, or that the price of these dwellings is higher than demanded. This is confirmed by the analysis of the actual builds that have occurred over the past two year, with only 46 infill and*

development dwelling being completed annually. This is also confirmed by the analysis completed by The Property Group in their 2019 report which evaluated the commercial feasibility of medium density housing (paras 87 and 88).

- j.* Objective 2 of the NPS-UD requires competitive land and development markets. The Herfindahl-Hirschman index analysis is considered to be the best tool in determining the competitiveness of market, and for example is used by the Commerce Commission. The H-H index analysis undertaken by Mr Thompson supports the conclusion that the PDP does not have sufficient residential land to enable affordable housing or a sufficient quantity of dwellings to meet demand. This will result in significant economic and social costs that become progressively worse over time. Most notably, the average house price would exceed \$900,000 or \$1 million within a few years and population growth will slow or start to decline (paras 89 – 91).
- k.* *The PDP does not meet the requirements of the NPS-UD which requires the demand for housing, by type and price, is met⁶ (para 94)*

93. In para 95 Mr Thompson concludes that -

“...the PDP does not have sufficient residential land to enable affordable housing or a sufficient quantity of dwellings to meet demand. This will result in significant economic and social costs that become progressively worse over time. Most notably, the average house price would exceed \$900,000 or \$1 million within a few years and population growth will slow or start to decline. The PDP does not meet the requirements of the NPS-UD which requires the demand for housing, by type and price, is met.”

94. The analysis and assessment undertaken by Mr Thompson therefore suggests that the rezoning of the site to FUZ would not lead to an over-

⁶ NPS UD Policy 1(a)(i)

supply of FUZ land. Therefore, it can be asserted that the adverse material economic costs to the community identified by Mr Osborne would not be realised. On the contrary, Mr Thompson identifies that the insufficient zoning of residential land that would enable affordable housing or a sufficient quantity of dwellings to meet demand would result in significant economic and social costs.

95. Therefore, it is my view that the proposed rezoning aligns with the NPS-UD. Specifically, Objective 2 requires that planning decisions improve housing affordability by supporting competitive land and development markets, Policy 1(a)(i) requires that planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum –

a. Have or enable a variety of homes that:

- i. Meet the needs, in terms of type, price, and location of different households*

And Policy 2 requires that *“Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term”*.

96. With respect to the strategic direction objectives of the PDP, the analysis and assessment undertaken by Mr Thompson supports the inclusion of the Silverwood site in HO-O3 that was requested in Silverwood’s original submission:

Recognise that the intended use of the Northern Growth Area, ~~and~~ Judgeford Hills and Silverwood is primarily for residential purposes, while Judgeford Flats is primarily for industrial purposes.

97. The rezoning would also be consistent with strategic objectives HO-01, UFD-01 and UFD-02.

Clarifications

98. In para 309 of the s42A report Ms Sweetman requests that Landcorp

support for the submission be addressed before or at the hearing. A letter of support has been provided by Pāmu Landcorp. Refer **Attachment One**.

Greater Wellington Regional Council Further Submission

99. Greater Wellington Regional Council submitted in opposition⁷ to the submission citing that –

- *The District Plan must give effect to the NPS-FM.*
- *additional areas of greenfield development will add to the contaminant load entering the environment; and*
- *the NPS-FM requires that urban development maintains or improves water quality.*

100. I agree with the points raised by Ms Sweetman in relation to this submission⁸.

Conclusion

101. Based on the assessment provided in this evidence, that has relied on the technical reports accompanying Silverwood submission, and the evidence of Mr Thompson and Mr Hudson, it is my opinion that:

- a. FUZ is an appropriate zone for the site given site attributes and considerations as well as identified of the site as a growth area in the Growth Strategy.
- b. The rezoning of the site to FUZ aligns with the purpose of the FUZ as set out in Objective FUZ-O1 and satisfies the criteria for rezoning sites to FUZ as set out in Policy FUZ-P1.
- c. The future structure planning process, as enabled through the FUZ provisions and Appendix 11 of the PDP, will ensure that adverse effects on the identified values of the SAL can be avoided, remedied or mitigated.

⁷ FS40.119, FS40.115, FS40.116, FS40.117 and FS40.118

⁸ Section 42A Report – paras 339 – 346

- d. The FUZ provisions and associated structure planning and plan change process does not imply a blanket rezoning to a residential zone and that a comprehensive structure planning process that assesses the matters set out in Appendix 11 can adequately assess areas suitable for residential development, as well as associated open space, recreation areas / opportunities and roading connections.
 - e. The matters set out in Appendix 11 will enable cultural values of the site to be identified and assessed as part of the future structure plan and plan change preparation process.
 - f. If the site is rezoned to FUZ, a supply and demand assessment will be required to confirm whether or not the proposal would align with the NPS-UD at that time.
 - g. The rezoning of the site is consistent with the relevant strategic objectives of the PDP as well as the relevant objectives of the NPS-UD.
102. Ultimately, it is my overall conclusion that the proposed rezoning achieves the purpose of the FUZ, satisfies the criteria in Policy FUZ-P1 and is consistent with the strategic directions of the PDP as well as the relevant objectives and policies of the NPS-UD. Therefore, it is appropriate that the site is rezoned to FUZ.

Stephanie Blick

Principal Planner

Scope Planning Limited

Date: 20 June 2022



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07 June 2022

Peter Tiedeman
Silverwood Corporation Limited
Email: pect@xtra.co.nz

Dear Peter,

This letter has been drafted in response to discussions with Silverwood Corporation Limited and its consultants with regards to the proposed rezoning of their site, together with the site at 90 Arahura Crescent, Waitangirua (termed in the submission 'the Landcorp block').

The Landcorp block was originally owned and managed by the Department of Lands and Survey and transferred to Landcorp Farming Limited on its inception in 1987. Since 2008, Landcorp Holdings Limited (a subsidiary of the SOE Landcorp Farming Limited) has held the block, on behalf of the Crown, primarily for treaty settlement purposes.

The block was identified as a Deferred Selection Property ("DSP") in the Ngāti Toa Rangātira Deed of Settlement and, while Ngāti Toa Rangātira elected not to purchase the site through the DSP process set out in the settlement, the Crown has offered Ngāti Toa a right of first refusal over the block. Landcorp and Ngāti Toa are currently in discussions around the future ownership of the block.

Silverwood Corporation Limited engaged with Landcorp throughout the drafting of the submission and preparation of the structure plan but, at that time, Landcorp could not commit to providing formal support due to separate land disposal and settlement process discussions that were taking place.

Landcorp is in general support of the land being used for its highest and best use and therefore supportive of the proposal submitted by Silverwood.

Yours faithfully,

Mark Leslie
Chief Executive Officer



JUDGEFORD HILLS

Development Concept

SUMMARY DOCUMENT

Prepared by:

O'Callaghan Design, Orogen, RMA Ecology, Tim Kelly Transportation Planning, and Urbanismplus

AUGUST 2018

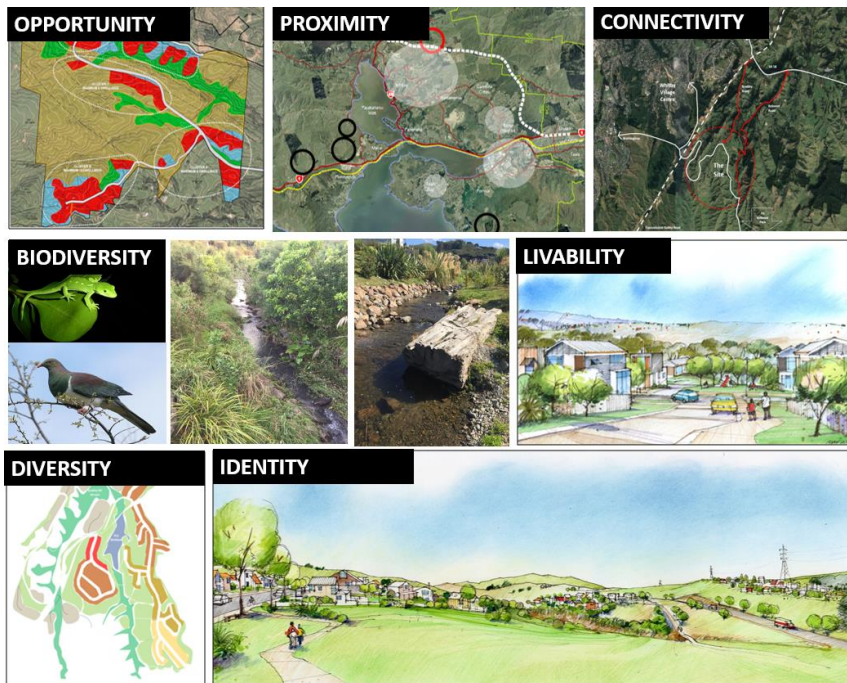
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1. EXECUTIVE SUMMARY

Porirua City Council are calling for candidate sites for urban growth to be considered for public consultation and potential inclusion into an Operative District Plan in 2020.

The Judgeford Hills site is seen as an ideal location for a residential development with a low density character which provides an opportunity for housing choice in an environment that is not offered elsewhere in the district and represents a sustainable and efficient use of the land. In summary, the proposal offers the following benefits:



Locational advantage

- Good proximity compared to alternative locations (approx. 2.3km as the crow flies from Whitby village centre).
- Connects Whitby with Belmont Regional Park.
- Biodiversity link from Pauatahanui Inlet to Belmont Regional Park.
- Less traffic through the local rural communities.
- Visible from very few adjacent properties.
- Facilitates a Whitby/Judgeford Water Reservoir.

An enhanced outcome

- Targeting groups that are less dependent on public transport, and those who may bring job or wealth creation to the community.
- High liveability with a range of housing, walking and cycling choices.
- Significant water quality gains.
- Revegetation will bring more native birds and lizards.
- Engineering will minimise earthworks.
- Responds to landform and avoids visual intrusion on the ridgelines.

Improvement on current zoning

- The Judgeford Hills Zone is limited to 43 lots and this scale of development cannot justify the costs to bring the revegetation benefits of this proposal, or a new road connection to Transmission Gully Road.
- Development within the current Judgeford Hills Zone will increase traffic on local roads and induce longer travel distances.

2. OVERVIEW

INTRODUCTION

- The purpose of the proposed Development Plan Change is to allow for the rezoning of 155 ha of rural residential land to residential land with subsequent peri-urban residential development within a coveted location.
- This Development Plan provides for approximately 450 households in new residential areas, open enclaves, and ecological corridors. It is intended as a high-level concept plan that provides an opportunity for residential development in a way that maintains and protects the landscape and restores ecological health and connectivity.
- A primary issue identified by Council through public consultation is the need to protect and contribute to the overall health of Te Awarua-o-Porirua Harbour. The values of this development plan recognise for this need and for growth that enhances the natural characteristics of the area, protects water quality, and develops connections to the harbour.
- The construction of Transmission Gully Motorway now provides a new development opportunity within Judgeford Hills, with road access to the James Cook Drive Interchange, Transmission Gully Motorway and the Whitby Link Road now an achievable prospect. Therefore, this development is not reliant on access through Bradey Road and a connection to Bradey Road is not envisaged.



Figure 1: The Site.

3. THE SITE AND ENVIRONS

- The land to which the Development Plan relates is located to the east of Transmission Gully and the suburb of Whitby. The Whitby Village Centre is located a distance of approximately 2.3km from the site as the crow flies.
- The Judgeford Hills site is located at 272 Belmont Road, Judgeford, and is comprised of several allotments all of which are owned by a single entity.
- The site is approximately 155 hectares in area (see Figure 2) and is located in the upper headwaters of a key tributary of the Pauatahanui Stream, which terminates in the Pauatahanui Inlet of Porirua Harbour. A multitude of small streams, watercourses and seepages within the steeply incised landform of site convey waters to two principal streams within the site.
- The site is presently undeveloped with grazed rolling hills and gullies, typical of the rural character for the region. The site was formerly a working farm and is now leased for pastoral grazing purposes with local livestock.
- The southern end of the site is dominated by steeper hill country which adjoin Belmont Hills and the Belmont Regional Park. The hill country is incised with gullies, natural streams and wetlands within low lying areas, although the ecosystem of the wetlands has been highly compromised by historical grazing practices. The neighbouring land to the north and to the east is rural in nature with lifestyle properties leading the landscape.
- The geology of the site is described by GNS Science webmap as alternating sandstone and mudstone; poorly bedded sandstone with minor coloured mudstone; conglomerate; basalt; chert. The Moonshine Fault bisects the site.

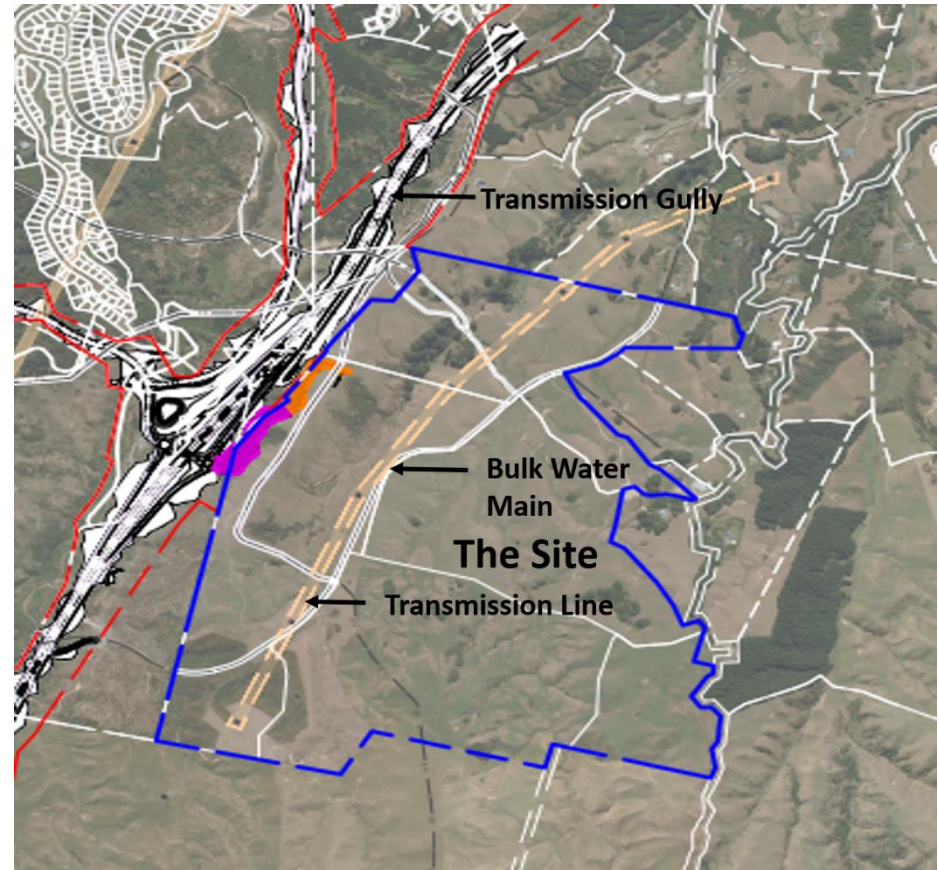


Figure 2: Site Location Plan

4. THE REGIONAL CONTEXT

The Wellington Region is unified with strong social linkages. The Judgeford Hills site provides an opportunity to develop greenfield land in a location which is ideally connected for travel around the region for social, education, retail, and employment purposes.

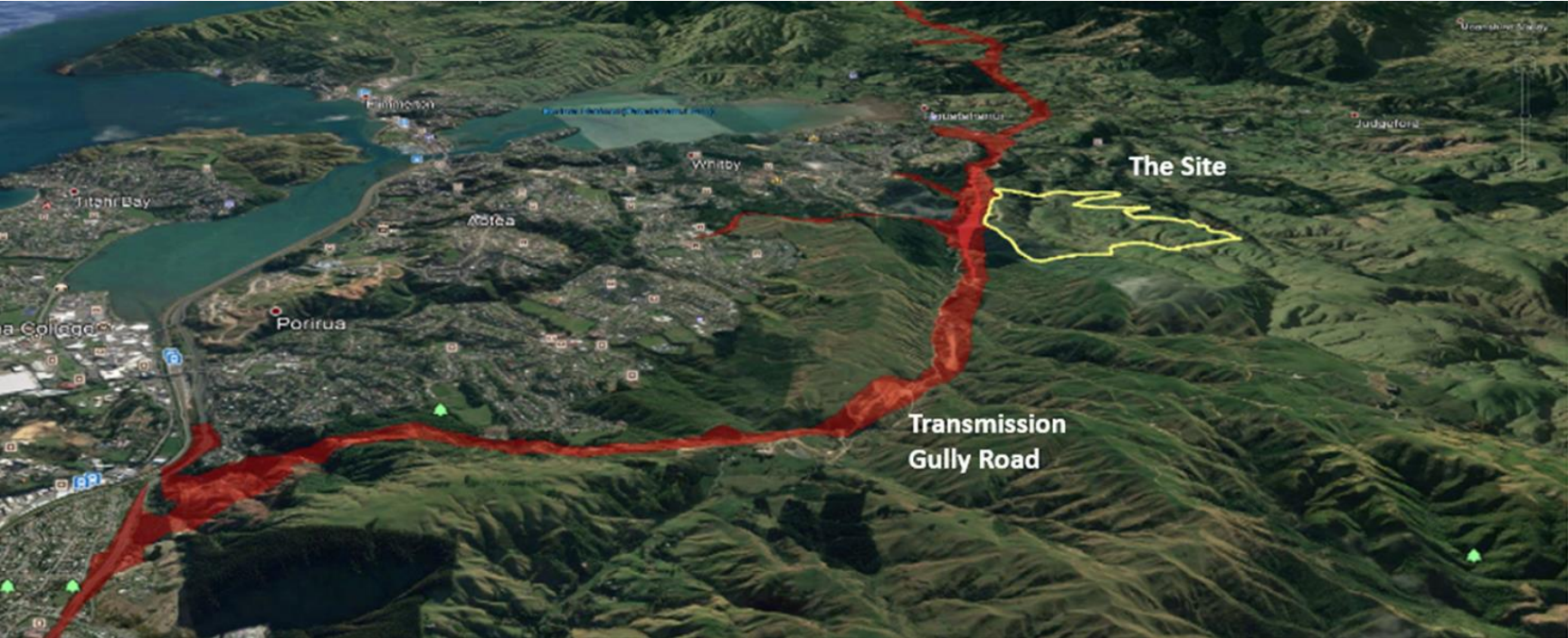


Figure 3: Regional Location Plan

Comparative proximity

The site is deceptively close to Whitby as illustrated below and its proximity to Porirua's key destinations compares well with other developable areas.

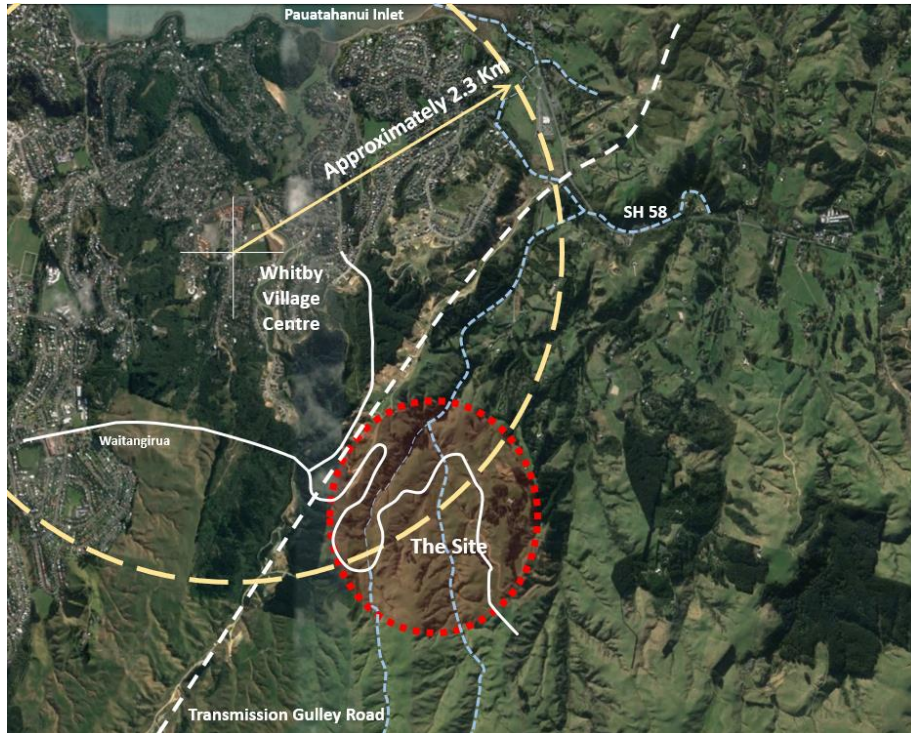


Figure 4: The site is deceptively close to Whitby, approximately 2.3 kilometres as the crow flies from the village centre.

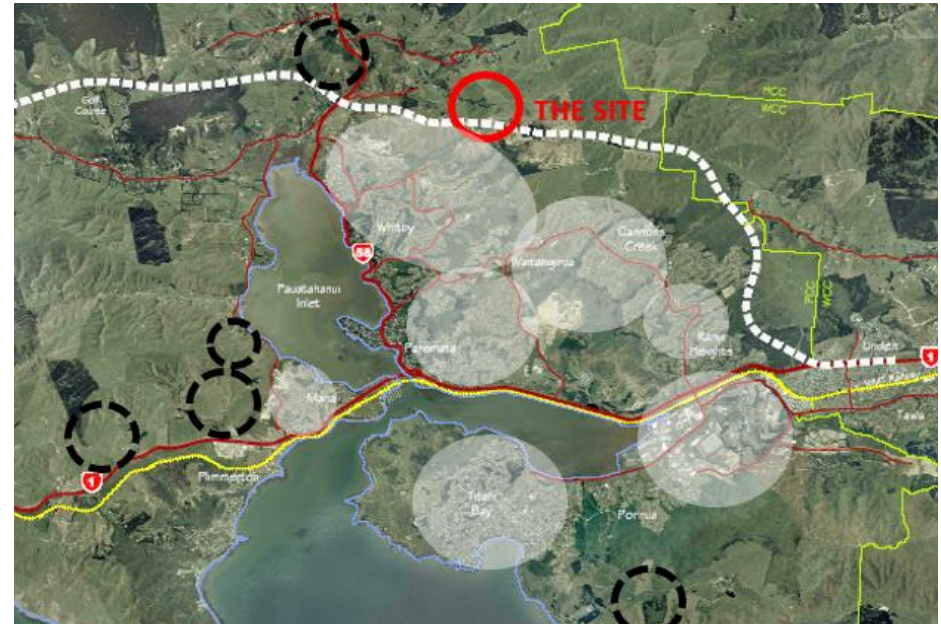


Figure 5: The proximity of the site compares well with several other developable areas.

5. THE PLANNING CONTEXT

Urban Growth

The National Policy Statement on Urban Development Capacity ranks the Wellington Region as a medium growth area. There is a need to provide a range of housing choice within the city to provide for peoples' social and economic means. The Judgeford Hills proposal aims to provide a unique offering with a development design that is high quality and visually complements its surroundings.

Regional Policy Statement

On a regional scale, the Judgeford Hills site is located in close proximity to the existing urban environment and can be provided with a rational connection to the Transmission Gully Motorway. In this regard the development of the site is considered to maintain a compact, connected and well designed regional form.

Existing Zones

The site is located within the Judgeford Hills Zone, and to a small extent, the Rural Zone, of the operative Porirua City Council District Plan (see Figure 7). The Judgeford Hills Zone provides for Cluster Residential Development and identifies 43 lots and a maximum of 40 dwellings as a Controlled Activity within the zone provisions. The Structure Plan of the Judgeford Hills Zone (see Figure 5) envisages access through Bradey Road and not through Belmont Road or Transmission Gully. This road access within the Structure Plan is also the general alignment of Greater Wellington Regional Council Bulk Water Pipeline.



Figure 6: Operative District Plan Zoning

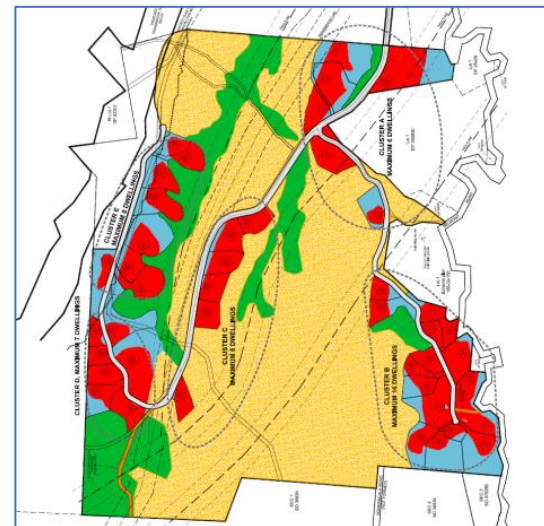


Figure 7: Judgeford Hills Zone – Overall Structure

6. ENVIRONMENTAL OPPORTUNITY

Connecting Belmont Regional Park with the Pauatahanui Inlet

With the completion of Transmission Gully motorway, the Judgeford Hills site will provide a key wildlife and green linkage between the Regional Parkland to the south and the Pauatahanui stream, riparian margins and inlet to the north. Without this linkage, the ecological connectivity of the landscape, especially once Transmission Gully bisects and isolates landscapes to the west, will be fragmented and reinforce patterns of habitat discontinuity and loss that are occurring throughout the local area.

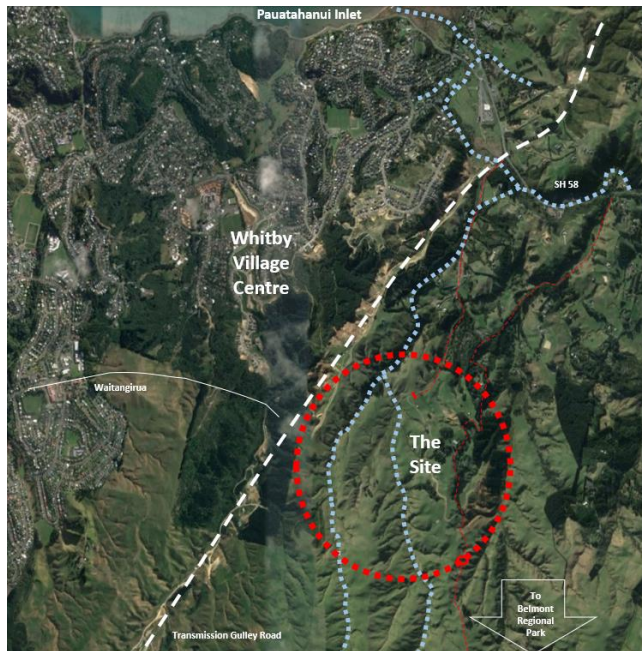


Figure 8: The environmental context.

The Judgeford Hills land is intended to be developed in a way, and to a state, that is sympathetic with the surrounding landform and which builds upon and restores the local ecology, including restoring and reinforcing wildlife links and ecological flows.



Figure 9: The corridors connecting Pauatahanui Inlet to Belmont Regional Park through the site.

Protect, Restore and Sustain

The Concept Development Plan for the site has three key foundations in relation to environmental management – Protect, Restore and Sustain.

At a landscape level, those foundation elements are expressed in the Concept Plan as follows:

Patterns

The landform of the site is naturally steep with multiple incised gullies and prominent spurs and ridges. The Concept Plan avoids development within all of the mainstem watercourses. The clustered nature of the proposed lot layout seeks to avoid, minimise, or mitigate effects on headwater flow paths and watercourses, rather than dispersing the development footprint widely across the site. The predominant patterns of the landform will therefore be preserved and reinforced through appropriate ecological restoration or enhancement.



Figure 10: Views of the site with Bradey Road stream bottom left.

Connectedness

The green spaces on the Concept Plan layout comprise more than half of the site and are intended to function as sequences of ecosystems that are connected in a natural way and which flow through the site. The two mainstem permanent streams provide the backbone of the connections between the Regional Parkland to the south, through the Judgeford Hills land and into the lower parts of the Bradey Road tributary (off-site).

Revegetation of these principle watercourses will provide connections between riparian margins and instream eco-functions and biodiversity – through shading of the watercourses, providing suitable margin habitat for fish spawning, organic inputs into the stream from bankside vegetation, and terrestrial habitat for stream life that have life phases in and out of the water.

Ecological flows through the site are currently compromised where road culverts are perched, and therefore prevent passage by some native fish species to upstream areas. Upgrading of these culverts to provide for unimpeded fish passage will return a significant portion of streams within the Judgeford Hills land and the adjoining Regional Parkland to usable fish habitat. This has the potential to provide a considerable local ecological gain for native fish that have been excluded from these upper catchment areas for many decades.

Connectedness extends beyond only the streams and margins. Wherever possible, margins of lesser watercourses – intermittent streams, ephemeral flow paths and headwater seepages will also be retired and planted to support appropriate indigenous vegetation. In combination, this will provide swathes of woody vegetation that are sufficient to provide biodiversity corridors in

themselves and encompass a range of topographic habitats from ridgelines to valley bottoms.

Parts of the site not actively planted will be retired from grazing to allow grass swards to develop, which will provide habitat for smaller wildlife in the short term and areas for natural or future revegetation plantings in the long term.

In combination, re-connecting the site will restore sequences of ecological communities that have been lost for many generations. Ridgeline, and slope forest and shrublands will be connected to toe-slope and riparian margin vegetation and waterways. Several parts of the site support degraded floodplain or wetland environments, and the Concept Plan also intends to restore these, providing a complete sequence of interconnected habitats throughout the length of the property.

On-site restoration

The restoration approach for the site is generally to build on the resources that are already present – namely the mainstem waterways and the regenerating native forest fragments across parts of the site.

Protection of existing natural features therefore plays a cornerstone role in providing the framework for restoration. The key features proposed for protection are the two permanent streams that bisect the property and the valleys that support those streams. Contributing minor watercourses will be preserved where practicably feasible – while acknowledging that development of parts of the site will result in the loss of some areas of these headwater gullies and watercourses.

Riparian re-vegetation will follow good practice as outlined in the planting guidelines published by the Regional Council, with planting palates and zones reflecting the variety of natural habitats that exist between the valley bottoms and ridgelines.

Overall, it is envisaged that within the two principle stream gullies, revegetation will focus on providing a diverse mix of coloniser and long-lived native plants to create diverse shrubland and, over time, establish diverse mature podocarp/ hardwood forest. Where planting is located near to development clusters, the final community type may focus on shrubland or lower height planting mixes. Where restoration areas intersect with sightlines for amenity or safety reasons, plantings will concentrate on creating low-stature vegetation cover, such as low stature plant communities and unmanaged grasslands.

The low-lying land on the eastern-most arm of the tributary stream (above the confluence of the two mainstem waterways) offers a fantastic opportunity to develop habitat for special species and to contribute to catchment-wide water quality and regulation services. The floodplain at this confluence is extensive (approximately 1.5 ha in area) and supports very degraded wetland vegetation. If the downstream road culvert is managed appropriately, this confluence area could be restored as an ephemeral (seasonally wet) wetland. Planting with appropriate native wetland sedges and grasses would provide dense, low cover favoured by several native birds (such as pukeko, crane and bittern – and perhaps fernbird if the recent translocation and release into Pauatahanui Wildlife Reserve is successful). Providing such an extensive floodplain area at this location would assist with regulating flood flows from the Belmont Regional Park and adjoining Judgeford Hills land, and ultimately better protect the Pauatahanui Inlet as the receiving environment, by reducing flood flows and potential for sediment discharge downstream.

At this site, vegetation will be dominated by thick swards of raupo, carex grasses and rushes that will form a dense sward up to 1.5m tall. Clusters of cabbage tree and fringe plantings of kahikatea and other appropriate wetland woody plants will also be undertaken.

Biodiversity

Indigenous biodiversity on the site is only a small portion of what would have originally lived there. The loss of forests, wetland vegetation, stock access to streams and the passage of time as a working farm have removed many of the elements typical of a healthy, functioning native ecosystem.

The restoration programme proposed will return many of these elements back to the site. Revegetation at the scale and of the type proposed has the ability to attract and sustain a diverse range of forest birds, such as fantail, tui, bellbird, kereru, silver-eye and others. Shrubland and forest areas will increase in natural diversity once birds start to bring in seed of native trees and shrubs from the neighbouring Regional Parkland and surrounding bush areas.

Native lizards (such as copper skink, common skink and, if present, ornate skink) will move out from refuges within the site to inhabit the new habitats, and forest and shrublands will offer opportunities to reintroduce iconic native geckos such as the Wellington green gecko and forest gecko.

The restored wetland offers the opportunity for rare and threatened wetland birds to feed, breed and establish a permanent presence.



Figure 11: Native birds.



Figure 12: Native lizards.

Water quality

Key consideration for the site, given the steep landform the development of hard surfaces and point sources of discharge from development areas. Water quality will be protected and improved through the use of:

- Swales alongside roads to pre-treat and retain water
- Stormwater detention basins in headwater catchments to further detain and clean storm flows from roads and built areas.
- Appropriate treatment of water at development clusters and intermediate treatment with detention basins will protect receiving waterways and wetlands such that there are no discernible effects.



Figure 13: Examples of stream regeneration



Figure 14: The location of the dry wetland.

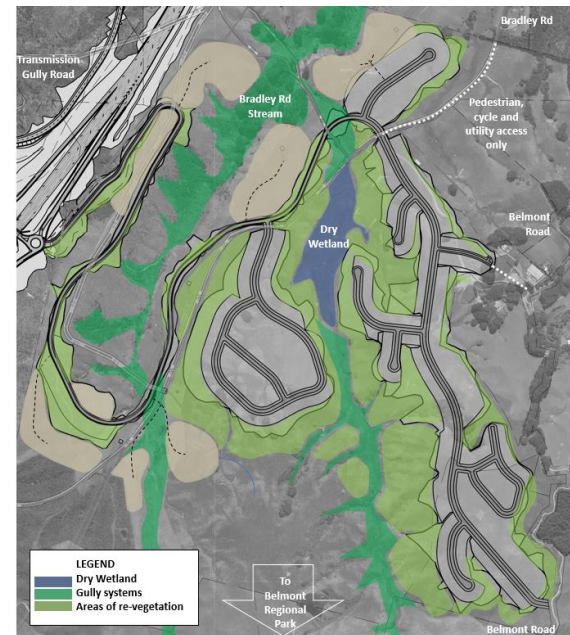


Figure 15: The Environmental Concept.

7. ENGINEERING OPPORTUNITY

TRANSPORT AND ROADING

Access

Development of this land is founded upon the provision of direct road access from the new James Cook intersection on Transmission Gully (TG). The availability of immediate access to the strategic road network from this point means that vehicular accessibility will be very good including the Porirua CBD as illustrated below.

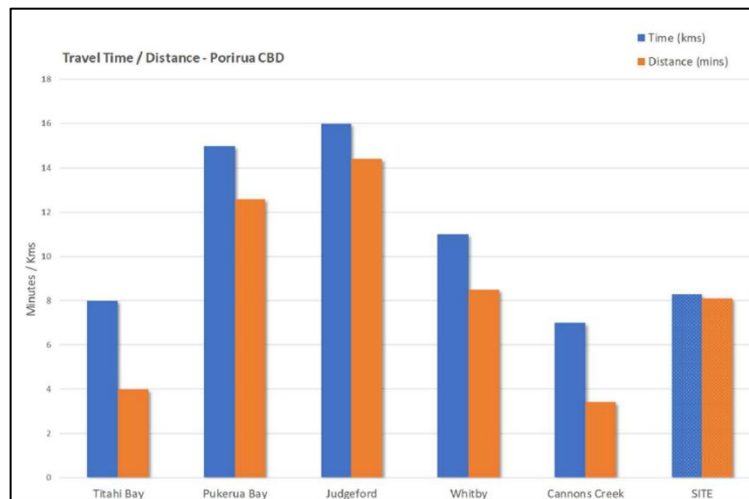


Figure 16: Travel/Time to Porirua CBD comparison between the site (far right) and other locations

Easy access will also be available to:

- The Porirua CBD via TG and the Kenepuru link road
- The south (Tawa & central Wellington) (via TG to the south and the existing State Highway 1)
- The north (Kapiti, Horowhenua and beyond) (via TG, the Kapiti Expressway, the Peka- Peka to Otaki expressway)
- The Hutt Valley (via TG to State Highway 58 and State Highway 2)
- Local facilities in Whitby and Porirua (east) (via the Whitby / Waitangirua link roads).

Kindergartens

- Adventure Kindergarten, Longitude Place (6.4 kms, 9 mins)
- Mana Montessori Pre-School, Albatross Close (5.8 kms, 7 mins)
- Adventure Educare, Resolution Drive (5.5 kms, 7 mins)

Primary Schools

- Pauatahanui School (3.8 kms, 4 mins)
- Adventure School, Longitude Place (6.4 kms, 9 mins)
- Discovery School, Pullen Lane (7.3 kms, 10 mins)

Secondary Schools

- Samuel Marsden Collegiate School, Starboard Lane (5.6 kms, 7 mins)

- Porirua College, Driver Crescent, Cannons Creek (6.7 kms, 9 mins)
- Aotea College, Okowai Road, Papakowhai (8.0 kms, 11 mins)
- Bishop Viard College, Kenepuru Drive (10.2 kms, 10 mins)

In general, primary schools are located within the established urban parts of the district and for this reason are more accessible in these areas. The site would be similar to other more rural parts of the district where there is a reliance upon private vehicle use or school bus services.

Accessibility comparisons with other parts of the district are of little value, since many children do not attend the closest available secondary school. The location of the site means that any travel by walking / cycling / public transport would be precluded (unless public or school bus services were to be provided) and the use of private vehicles would be necessary.

Transmission Gully

Modelling work undertaken by Jacobs (using the traffic model developed for the TG assessments) has concluded that the traffic activity associated with a 500-dwelling development scenario would not impact upon the operational performance of the James Cook intersection by the year 2048.

Public Transport

Greater Wellington (GW) has responsibility for the provision of public bus services throughout the region, while Porirua City Council (PCC) is responsible for the provision of the associated infrastructure (bus-stops, signage, etc). The configuration of the proposed development area, with a lack of a through route and

several cul-de-sacs, means that this would be a less attractive proposition for a bus company.

Rail Services

The location of the development area would not preclude the use of the rail network, especially for commuter travel. Census statistics indicate that 10.1% of Whitby residents identified 'train' as their main means of travel to work in 2013, despite being similarly distant from the rail network. The existing 'park and ride' facility at the Porirua central railway station would be the most convenient for this development area, being accessed by means of the Kenepuru link and Mungavin interchange. Alternatively, use might be made of the Paremata railway station and parking, accessed by means of the Whitby link road, James Cook Drive and State Highway 58.

Walking and Cycling

Walking/cycling paths and bridle paths can provide safe and attractive environments for recreational and commuting access (e-bikes) both within the site and externally to the wider existing urban areas and adjoining Belmont Regional Park.

OTHER SERVICES

This section outlines the approach to providing essential infrastructural services to the development area. It is worth acknowledging that the economic viability of the servicing options is dependent on the total lot numbers and development densities proposed for the area.

There is no water reticulation or wastewater reticulation to service the area. The capacity of the existing Porirua City Council water and wastewater infrastructure in the nearby suburb of Whitby is also limited but we note there are water supply opportunities to benefit this area from the site.

Water

The water service to the development area would be supplied from a new reservoir in the southern part of the site, as indicated by Figure 17. The reservoir would be supplied from the bulk water mains within the site. The distribution mains, from the reservoir, would supply houses within the site and could be extended to the wider Whitby area if desired by Council. They could also be extended to Bradey Road and the Pauatahanui area beyond, if desired by Council.

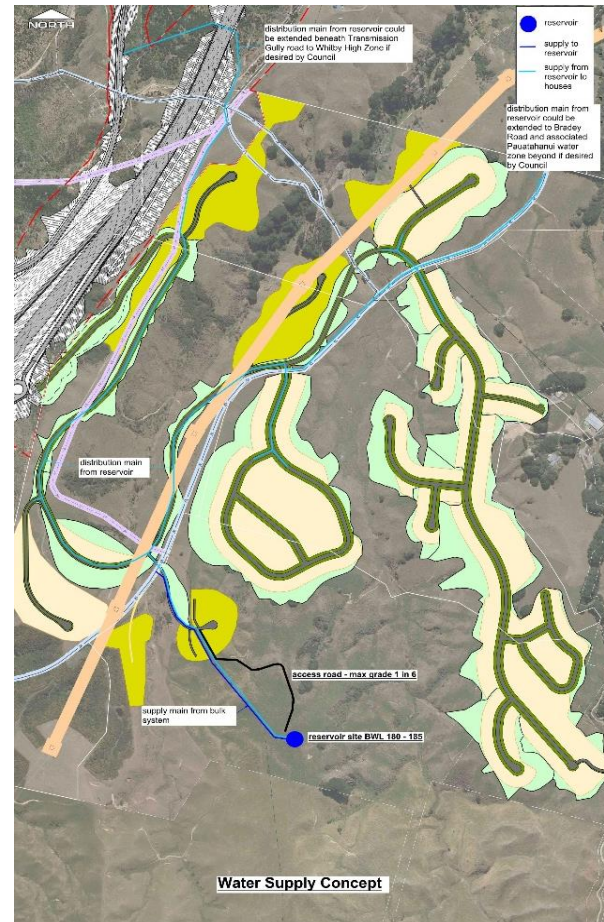


Figure 17: Water Supply Concept

Wastewater

The wastewater service to the development area would be connected to the Council's wastewater reticulation system in James Cook Drive. This will require a pump station within the site to pump the wastewater over the hill, down to, and under,

Transmission Gully Highway to the reticulation in James Cook Drive Link Road. Storage will be required on the site to manage peak flows pumped from the site during wet weather. It is also anticipated other solutions within the site will be implemented to avoid significant increases in flow during wet weather.

Stormwater

The management of stormwater would be an integral component of protecting, restoring and containing the environmental outcomes on the site and beyond. The dry wetland will provide a final treatment component of the stormwater discharges from the site and will provide storage during rainfall events to buffer peak flows from the site.

Stormwater runoff from the roads will be discharged to grassed swales, which will discharge to a piped system, where feasible. Where it is not feasible to use grassed swales the runoff from roads will be directly to the piped system. Houses will be discharged to the piped system.

The piped system will discharge to a several pre-treatment first-flush dry basins. These will provide some settlement and separation of contaminants prior to the flow being discharged to the main gullies. The flow from the eastern main gully will pass through the dry wetland. The flow paths and first-flush dry basins are indicated on the stormwater concept figure.

The pre-treatment of stormwater with both the first-flush dry basins and the dry wetland area will result in benefits including:

- Reduction in suspended solids in stormwater that is discharged into streams, waterways and the harbour.

- Reduction in contaminants within stormwater that is discharged into streams and waterways and the harbour.
- Reduction in erosion and scouring of land and stream banks.

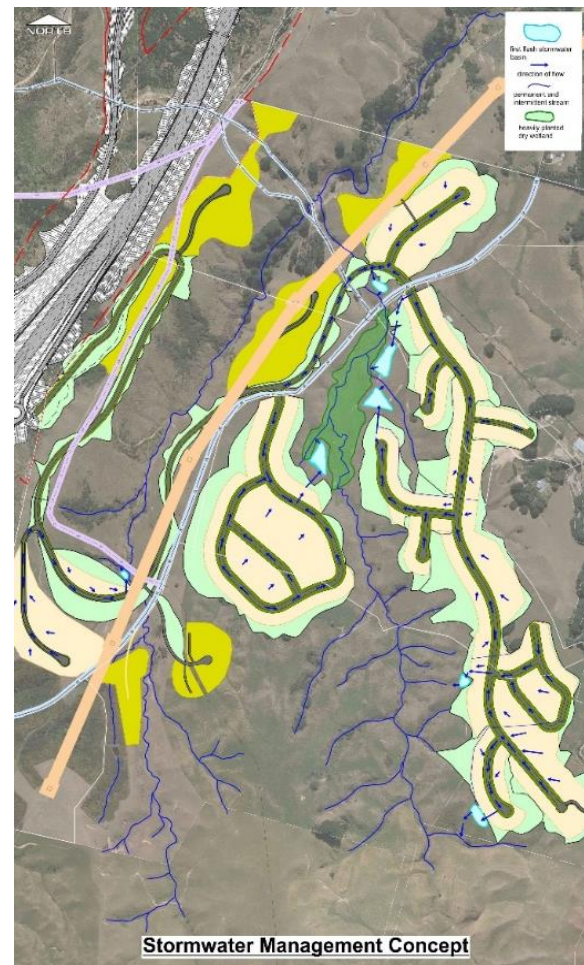


Figure 18: Stormwater Management Concept

Earthworks

The primary sources of sedimentation in Porirua Harbour is from terrestrial sources originating from erosion prone rural land, stream bank erosion and earthworks associated with land development and major infrastructure (roading) projects.

Development of the site can be carried out in a manner that controls sediment runoff from the site to an acceptable level and in accordance with environmental best practice. The concept for the site is strongly structured around protecting, restoring and containing the environmental health of the site.

Earthworks required on the site to form the roads and house development areas within the site would utilise all the erosion and sediment control solutions to meet the environmental needs and objectives of the site.

Replanting on earthworked areas, to protect the exposed soils and to achieve the desired re-vegetation on the site would be a key final step in protecting the streams from potential sediment runoff.



Figure 19: Earthworks approach works with the land form.

8. THE URBAN DESIGN OPPORTUNITY

Justification of the site location

In an ideal world urban expansion is either contiguous with the existing settlements or of a scale that supports an autonomous new community. Neither of these options are available, at scale, for Porirua. Yet the imperatives to increase the housing stock and offer wider housing choices compel the city to consider the opportunities that do exist. When considering these two criteria are paramount, how do they compare in terms of locational proximity to existing communities, and which extraordinary benefits do they offer. The public transport shortcoming will be addressed by targeting residents that are not reliant on needing public transport within walking distance.

The preceding sections illustrate the comparative proximity of this site, how close it is to Whitby Village Centre, public transport facilities, and a wide range of educational and community services. Its location facilitates a major biodiversity link between Pauatahanui Inlet and the Belmont Regional Park, it also facilitates a public movement link from Whitby to the Park. Traffic will reduce in existing rural roads.

Opportunity for extraordinary benefit

The site itself offers a range of extraordinary benefits with regards water quality security, and the reintroduction of native plants, lizards and birds. The opportunity is to create an exceptional living environment close to nature, with a variety of housing choices, and with good recreational experiences. The hope is that some of the future residents will be of a calibre that create employment and support local jobs.

“We will build our roads on the ridges, live on the slopes, and play in the valleys”

The conceptual approach was somewhat informed by this Roman maxim. The design works with the landform. Roads are kept out of the ecologically sensitive valleys, houses nestle on the slopes, and the streams are revegetated and lined by walking and cycling tracks. The diagram below hints at the geometric sensibilities that merge urbanism with land form.



Diagram 20: Concept diagram

Design attributes

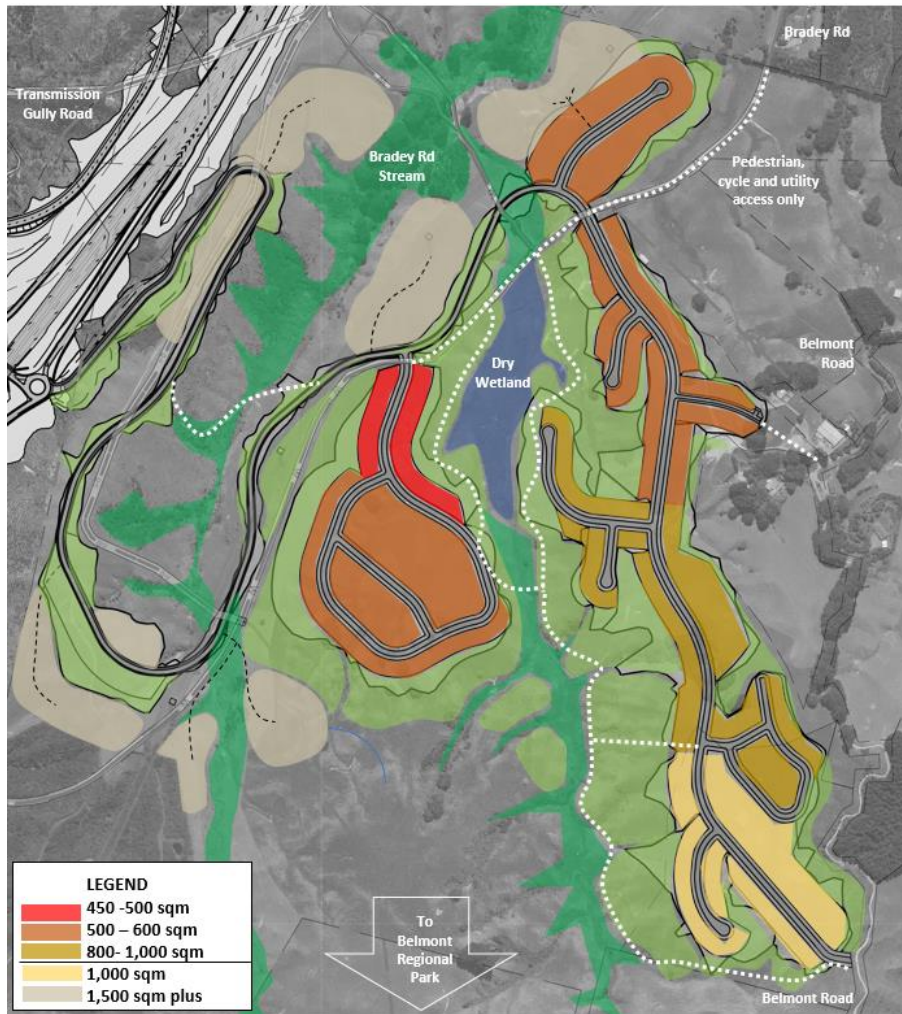


Figure 21: Layout plan and residential mix

Morphology

While the urban design preference of delivering a connected network of streets with perimeter development is not achievable on this undulating site, the safety and connectivity objectives can still be addressed. The ‘backs’ of houses on the downward slopes will be managed with landscaping provisions to avoid jarring walls. The steep areas between houses and stream will be highly visible from elsewhere, attending to security concerns.

A variety of open space experiences

A range of open spaces and ecological areas will allow environmental enhancement and recreational activity by walking, cycling and horse riding. A small public park could also be developed on the site.

High quality of liveability

The living environment will offer opportunities for social interaction by ensuring strong visual connections between street and house, good solar gain, and well defined private outdoor areas.

A distinctive Identity

The distinctive identity of the settlement will be one of a residential community ‘nestled’ in a large undulating landscape. The transition between urban and natural environment will be managed with revegetation planting which is additionally of ecological value.

Good diversity of housing choice

The development will provide for a wide range of housing choice with approximately 450 houses and section sizes, ranging from 450m² – 1500m² plus, as well as some rural residential sections that absorb much of the surrounding rural landscape.



Figure 22: Visual character of housing on the smaller lots.

Landscape

A detailed landscape assessment will ensure those areas identified as being of significant landscape value will be carefully controlled for visual amenity. In a visual sense, the proposed development area is relatively confined and visible from very few adjacent properties. While the development will introduce ‘built forms’ and thus change the current rural landscape and visual ‘open space’ characteristics of the site, the urban design will ensure a high amenity environment with extensive open space.

Natural Hazards

Any development will seek to avoid natural hazards and recognise the potential for natural hazards management.

Historic and Cultural Heritage

There are no known sites of significance for their historic or cultural heritage, however if any such sites are discovered, they will be protected from development. Consultation with iwi will occur throughout the development process.

Proposed Zoning

In accordance with The Draft National Planning Standards (MFE Publication Number ME 1364, dated June 2018), we recommend the site be incorporated into the proposed District Plan as a Development Area. Conceptual plans would determine future land use and/or development. The Development Area is likely to consist of residential areas and/or open space areas as proposed within this summary document.

A sensitive response to the land form

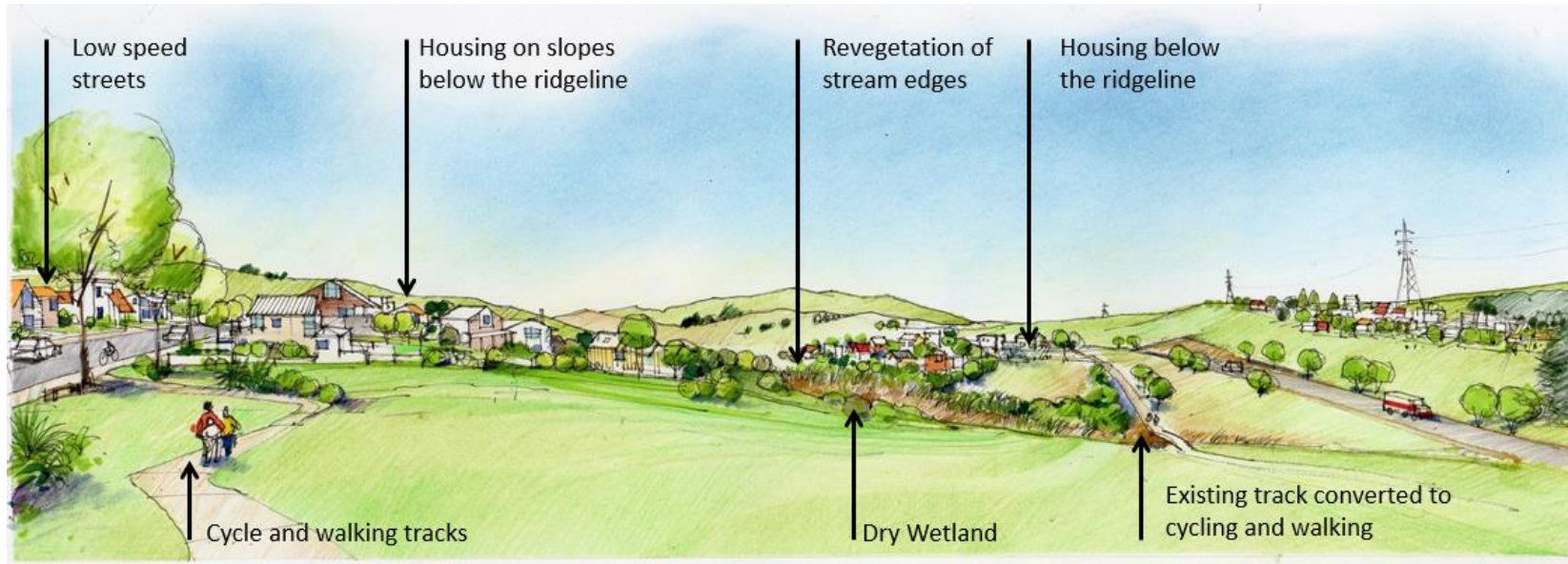


Figure 23: Views of the existing land form and how the new settlement will respond to the land form.