

Before the Independent Hearing Commissioners
For Upper Hutt City Council

Private Plan Change 55

Under the Resource Management Act 1991 (**RMA**)

In the matter of Private Plan Change Request

Between Maymorn Developments Limited

Requestor

And **Upper Hutt City Council**

Respondent

STATEMENT OF EVIDENCE OF RACHAEL ANNAN

19 September 2022

Qualifications and experience

- 1 My name is Rachael Annan. I am employed by 4Sight Consulting Ltd as a Principal Landscape Planner. I am a registered member of Tuia Pita Ora, the New Zealand Institute of Landscape Architects (NZILA), and hold a Bachelor of Landscape Architecture Degree (Hons.) from Lincoln University.
- 2 My relevant experience involves twenty years of professional practice across the areas of landscape architecture, landscape planning and urban design. This experience is largely based in resource management design review; with involvement in resource consents and private plan change applications. I have been employed in both the private and public sector and presented evidence at council hearings and the environment court.
- 3 Of relevance to this application, and more specifically, I have prepared the following reports for Upper Hutt District Council to provide rural areas landscape advice for the Draft PC50:
 - (a) Rural Land Use Assessment, Landscape Report for PC50 (September 2019)
 - (b) Rural Metrics for PC50 (April 2021)
 - (c) PC50 Rural Provisions Report (June 2021)
- 4 This evidence should be read in conjunction with my PC55 landscape peer review memo (May 2022). However, this is with the acknowledgement that the applicant has made amendments to the proposed private plan change since that time.
- 5 In preparing this evidence I also have reviewed:
 - (a) The *'Gabites Block Private Plan Change – Landscape Report'* (March 2022), and;
 - (b) Landscape relevant matters planning matters of the proposed PC55 (as current at the time of writing).
- 5 I visited the Application Site on 13 September 2022 and have undertaken several visits to the surrounding area since 2019 (for the preparation of the Draft PC50 landscape reports for UHCC). I have also taken part in a series of recent discussions with the applicant, their planner and landscape architect regarding landscape matters for this private plan change application.
- 6 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with this, and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of evidence

- 7 I have been asked by Upper Hutt City Council to prepare evidence in response to landscape and visual matters of the plan change request. My evidence addresses area based (as set out below) and review of more general landscape matters of the application:
- (a) Northwest Area
 - (b) Valley Flats Area
 - (c) Station Flats Area
 - (d) Hilltops Area (including the ridgeline protection overlay area)
 - (e) Hilltops Basin Area
 - (f) Hillside Area
 - (g) Submissions

Northwest Area

- 8 As set out in my landscape peer review, I do not agree with the landscape assessment rationale in support of lots of a minimum of 400m² (and 600m² average) in this location.
- 9 However, with regards to the policy context I acknowledge that due to the NPS on Urban Development and Enabled Housing Act, development of up to three residential units of up to three storeys high (relevant metrics not withstanding), will be permitted for adjacent residentially zoned properties.
- 10 On this basis, the proposed plan change density for this northwest area will be more compatible with the adjacent future permitted residential density (when it is undertaken) than it is with that which currently exists in the adjacent residential area.

Valley Flats Area

- 11 I agree with the Landscape Report findings and relevant proposed provisions for this area.
- 12 For both this area and the Station Flats area, I consider that subsequent subdivision design should allow for public access to shared amenity areas, particularly alongside the unnamed tributary of Blaikie Stream (p. 27, 57 Landscape Report), and provide for effective multimodal circulation both internally and to the wider site and surrounds.

Station Flats Area

- 13 As noted in my peer review, I agree with the landscape capacity conclusions reached for this area. I acknowledge the servicing constraints in this regard and subsequent limitation of further development at this stage. However, given the proximity of this area to the train station, I would encourage the applicant to design the allotments in a way that would allow for further intensification at a later stage.

Hilltops Area

- 14 I acknowledge the discussion underway to date with the applicant and their agreement to review the plan change approach to landscape related matters of concern, which are primarily for this area.

- 15 Overall, this includes more effectively addressing landscape character as set out in DEV3-04:

'An open, green landscape including most of the main ridgeline interspersed with sensitively located rural residential development and sensitively located supporting network utilities.' ('DEV3-04 Character and Amenity Values of the Hilltops Area' wording at time of writing)

- 16 I support the updated requirement for a landscape assessment at the time of subdivision. This will help facilitate a more place responsive subdivision development approach.

- 17 Further to a 2,000m² minimum lot size, I support the additional requirement for a 4,000m² minimum average lot size across the hilltops area. This further recognises the variable landscape capacity and gradients through the Hilltops Area.

- 18 One recommendation of note from the Landscape Report for this area, is that steeper land areas should be in limited land ownership (p. 67, Landscape Report). I agree with this point I and consider that the minimum permitted size 2,000m² lots are better located on flatter areas than steeper slopes. Limited development on steeper aspects will reduce the associated volume of earthworks required for building platforms and site access, simplify landscape management (including revegetation) of these areas, and reduce the potential visibility of delineation along property boundaries. While it would be better to address this point specifically, I note the related matters of SUB-DEV3-P4 (at the time of writing) whereby:

'Building platforms are located to prevent the appearance of linear or urban development and are visually separated...' (provision #4) and that

'In the Hilltops Area, cumulative development is managed by a minimum average allotment size to achieve an overall rural residential pattern of development that responds to landform including highly sensitive areas' (provision #7)

These above provisions may help to address this matter.

- 19 Another point to still be confirmed is the use of building height restrictions through the ridgeline protection area, discussed with the applicant's team in the order of one storey or a given height limit to that effect.

Hilltops Basin Area

- 20 Having visited the application site, I can support the landscape related plan change provisions for this area.

Hillside Area

- 21 I support the plan change's landscape related provisions for this area, including the requirement for a landscape assessment at the time of subdivision as this will help facilitate the integration of future subdivision development within this landscape setting.

Submissions

- 22 I have reviewed the summary of submissions for PC55. In response to concerns arising related to increased density set out by PC55, I note the density provisions of the Draft PC50 (as at the time of drafting PC55) provide a starting point for the densities proposed by this application.
- 23 There is a relationship between the proposed Northwest Area with adjacent residential zoning, and of the 1,000m² lots with the established settlement area properties along Maclaren Street. While this street is not adjacent the site, it does inform a comparative density pattern for settlement development areas (i.e., the proposed Station Flats Area density within the PC55 Application Site). There is also an underlying driver to provide for a settlement area development in proximity to the Maymorn Railway Station.
- 24 Overall, I can support the PC55 provisions to integrate future subdivision development within this landscape setting.

Conclusion

- 25 I acknowledge the landscape amendments made by the applicant and their team to address landscape matters raised in my peer review and subsequent discussions. Although awaiting the finalised PC55, and the outcomes of matters for the Hilltops Area (specifically as noted at paragraphs 18 and 19 above), I can broadly support the landscape related matters of this plan change application.
- 26 PC55 policy framework updates have more clearly brought recommendations from the landscape report through to policy provisions (where relevant) and matters for subsequent subdivision landscape assessments to address.

Rachael Annan



19 September 2022