

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE
WAIMAKARIRI DISTRICT COUNCIL**

IN THE MATTER OF

The Resource Management Act 1991
(**RMA** or **the Act**)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on the Proposed
Waimakariri District Plan (**PWDP** or
the Proposed Plan)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on Variations 1 and 2 to
the Proposed Waimakariri District
Plan

AND

IN THE MATTER OF

Submissions and Further Submissions
on the Proposed Waimakariri District
Plan by **Bellgrove Rangiora Limited**

**EVIDENCE OF TONY DOUGLAS MILNE
ON BEHALF OF BELLGROVE RANGIORA LIMITED
REGARDING HEARING STREAM 12E**

Dated: 30 April 2024

Presented for filing by:
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INTRODUCTION

- 1 My full name is Tony Douglas Milne, I am a Landscape Architect and founding Director of RMM Landscape Architects Ltd (**RMM**) which was established in 2010.
- 2 I hold a Bachelor of Arts degree from University of Canterbury, a Bachelor of Landscape Architecture degree from Lincoln University. I am a Registered Member and Fellow of the New Zealand Institute of Landscape Architects Inc.
- 3 I have experience in large greenfield developments across Greater Christchurch and wider New Zealand including district plan zoning reviews, plan changes and resource consents. Zoning review and plan change work includes projects in Nelson (PC28), Cromwell (PC14), Ravenswood (PC30), Queenstown (Homestead Bay and Ladies Mile), Ohoka (PC31), Mandeville, Kaiapoi and Rangiora along with Bellgrove North that have similar landscape and visual issues as Bellgrove South.

CODE OF CONDUCT

- 4 Although this is a Council hearing, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence.
- 5 Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

SCOPE OF EVIDENCE

- 6 I have been asked by Bellgrove Rangiora Limited (**Bellgrove** or **BRL**) to provide landscape and visual amenity evidence in support of their submission to the proposed Waimakariri District Plan (**pWDP**) to:
 - (a) Rezone the full extent of Bellgrove South Rural Lifestyle Zone (**RLZ**) to Medium Density Residential Zone (**MRZ**) in the pWDP. This excludes Lot 4 DP 25508 (100 Northbrook Road) which is already proposed to be zoned MRZ as part of Variation 1, this is an area of approximately 31.2 ha (**'the Site'**). Overall, it is the Site (inclusive of the Additional Land) which BRL seek to get rezoned MRZ and included within the SER-DA and SER-ODP;

- (b) Amend the South East Rangiora Development Area (**SER-DA**) overlay in the pWDP and the South East Rangiora Outline Development Plan (**SER-ODP**) to include an additional approximately 3.3 hectares of land (**Additional Land**) immediately to the east of the SER-DA; and
- (c) Amend the notified **SER-ODP** to include the Additional Land and various changes sought by BRL as shown on the following plans:
 - i. **'the Bellgrove South ODP'** focuses in on the Bellgrove South landholding (*Refer Sheet 9 of the Graphic Attachment*);
 - ii. **'the Revised SER ODP'** shows the overall SER-ODP and incorporates the changes sought by BRL (*Refer Sheet 10 of the Graphic Attachment*).

7 In my evidence I address the following:

- (a) The identification of the existing landscape values, visual amenity and rural character of the site and existing environment;
- (b) The landscape and visual effects of future development on the existing and anticipated landscape character and amenity of the site and its receiving environment from the following:
 - (i) having the full extent of the Bellgrove South Site rezoned from RLZ to MRZ;
 - (ii) the inclusion of the Additional Land (part of Lot 2 DP 452196) within the SER-DA; and
 - (iii) the amendments sought to the notified SER-ODP as shown on the Bellgrove South-ODP and the Revised SER-ODP.

SUMMARY STATEMENT OF EVIDENCE

8 The key landscape issue of the rezoning sought and the proposed extension to the SER-DA relates to potential effects on the amenity of the surrounding environment. This is because the change in density associated with MRZ scale development will alter the anticipated landscape characteristics associated with the proposed pWDP RLZ zoning, as experienced when travelling past the Site.

9 It is important to note, that the starting point for a landscape and visual assessment isn't the current open rural character of the Site. A reduction in current open rural

character is anticipated by the pWDP's rezoning to RLZ. Furthermore, there are several higher order planning documents, for example the Canterbury Regional Policy Statement (**CRPS**) and the newly endorsed Greater Christchurch Spatial Plan (**GCSP**), which have long earmarked most of this site for future urban development.

- 10 The alterations to landscape character that would result following a rezoning of the Site to MRZ are considered to be acceptable in the context of the wider existing development pattern due to the existing level of development that has and is occurring through the residential expansion of Rangiora.
- 11 The existing landscape values of the Site are based around the rural character that currently pervades. The Bellgrove South ODP provides a landscape framework relating to connectivity, blue and green space, and urban design opportunities for generating positive landscape outcomes.
- 12 It is my opinion that the proposed Bellgrove South ODP, and the proposed rezoning can be supported from a visual and landscape effects perspective. This is because the landscape effects of the proposal are similar to the notified SER-ODP and the proposed rezoning and the proposed ODP offers positive landscape effects through its comprehensive nature.
- 13 There are a number of potentially sensitive interfaces to be considered as shown on the Bellgrove South ODP and Revised SER-ODP. The landscape treatment along the residential boundary interface with the Cam/Ruataniwha River esplanade and reserve area, coupled with built form setbacks are also considered to be an appropriate response which will assist with integration of future development within Bellgrove South.
- 14 The extension of the SER-DA to include the additional 3.3 hectares of land, from a landscape perspective is a logical and rational extension, enabling the new urban area to be mostly bound by a natural landscape feature. The Cam/Ruataniwha River will provide an acceptable and positive edge to the SER-DA and as demonstrated by the Bellgrove South ODP, connectivity through this new edge to Rangiora can be attained with the River.

METHODOLOGY

Assessment Methodology

- 15 My evidence is tailored to suit the nature of the proposed rezoning and its context including the framework of the governing legislation. The statutory documents containing provisions relevant to the proposal are found in the Resource Management Act 1991 (**RMA**), National Policy Statements (**NPS**), Canterbury Regional Policy Statement (**CRPS**) and the pWDP. My evidence mainly focuses on the objectives, policies, and assessment matters under the pWDP that give effect to the higher-level statutory plans and documents.
- 16 The methodology and terminology used in my evidence has been informed by the *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*¹.
- 17 The Site was visited on 16th April 2024. The site visit was undertaken to assist in understanding the landscape character and values within the receiving environment including the outcomes anticipated by the pWDP and assessing the proposed ODP's actual and potential landscape and visual effects.
- 18 My evidence refers to a seven-point rating scale for assessing the proposed ODP's actual and potential landscape and visual effects. The scale is attached at **Attachment A** to my evidence.
- 19 My evidence is formatted as follows:
- (a) A description of the broad scale context of the Site, and a description of the receiving environment in terms of the existing landscape attributes and how these contribute to the existing landscape values of the receiving environment considering the proposed RLZ under the pWDP as the anticipated baseline.
 - (b) A description of the Site, in terms of its existing landscape attributes, and how these relate to the landscape values of the receiving environment.
 - (c) A description of the Bellgrove South ODP and the Revised SER-ODP, internal road network, landscape treatments on the road frontage and site boundary with the surrounding development, as well as enhancement of waterways within the Site.

¹ *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022.

(d) An assessment of the Bellgrove South ODP's actual and potential landscape and visual effects on landscape character and amenity values.

(e) An overall conclusion on the landscape and visual effects.

20 My evidence is accompanied by a Graphic Attachment (**GA**) at **Attachment B**, which includes site context plans, a photo-viewpoint location plan, the pWDP zoning map, site photographs, and the proposed Bellgrove South ODP and the Revised SER-ODP inclusive of the Bellgrove South ODP.

DESCRIPTION OF THE SITE AND RECEIVING ENVIRONMENT

Introduction

21 The Waimakariri District is one of the fastest growing districts in New Zealand. Rangiora has an estimated population of 21,400 and is the third largest urban area in Greater Christchurch (behind Christchurch and Rolleston). It experienced unprecedented population growth following the Canterbury earthquakes, and this is expected to reach 30,000 by 2048². Some 4,500 additional households are planned to the east and west of Rangiora existing residential zones, with the most significant opportunity in the northeast quadrant, due to its proximity to the town centre.³ The Site is located just south of the North-East quadrant at a distance of approximately 1km from the heart of High Street. (see Figure 1 below).

² Rangiora Town Centre Strategy Blueprint to 3030+ (published July 2020)

³ Ibid pg7



Figure 1: Future Residential Growth Areas in Rangiora shown in blue. Bellgrove Subdivision is central to the blue area on the right.

- 22 To prepare for the anticipated growth a Waimakariri District Development Strategy **(WDDS)** has been developed to outline 'broad growth directions for the main towns and acknowledges that further analysis will be required to determine the exact growth areas'⁴.
- 23 When considering the direction of expansion for Rangiora the strategy stated "For Rangiora, residential growth is anticipated to occur to the east and to some extent, the west. In addition to the identified constraints, focusing the majority of Rangiora growth to the east better positions Rangiora town centre in the middle of an overall settlement pattern, and provides close proximity for new residential land to existing and proposed community facilities in the east."⁵
- 24 The immediate surrounding area of the Site is generally flat, sloping gradually down to the south east as is revealed by the existing hydrology visible. Land use to the east and south comprises a mix of the rural open paddocks with associated framing infrastructure, and the more enclosed rural residential developments along the eastern edge of the Site. The eastern town boundary lies immediately west of the Site along Devlin Avenue and on the other side of Kippenberger Avenue to the north, the residential development comprising Bellgrove North is evolving.

⁴ Waimakariri 2048 District Development Strategy pg 3

⁵ Ibid pg19

The Site

- 25 The site is currently zoned Rural in the WDP, and it is proposed to be zoned RLZ in the pWDP. The Site is shown on *Sheet 7 of the GA* with the Additional Land to the immediate east also shown on *Sheet 7 of the GA*.
- 26 With the exception of the Additional Land, the Site is also subject to the South East Rangiora New Development Area overlay (*Refer to Sheet 8 of the GA*). The pWDP identifies four new development areas which are predominantly Rural Lifestyle zoned, on the outskirts of Rangiora and Kaiapoi, intended to provide for future growth (primarily residential) over the coming decades. These areas generally align with the Future Urban Development areas within the CRPS but are not already zoned either residential or commercial. The notified provisions of the pWPD identify a certification mechanism to release this land for urban development once a number of certification tests (namely technical and specific engineering requirements for servicing, as well as more general assessments for geotechnical and transportation issues) have been addressed.

Landform and Landcover

- 27 The Site comprises three titles owned by the submitter, with all currently used exclusively for farming and in particular cattle grazing and dairy farming. The part of the land sought to be rezoned covers just over 31.2ha, including the Additional Land and is outlined on *Sheet 5 of the GA*. I note that an additional 4.6 ha of land (Lot 4 DP 25508) located to the west of the Site is also owned by the submitter to be developed as part of Bellgrove South. It is excluded from this rezoning request given it is already zoned residential in both the WDP and pWDP.
- 28 The Site is wedged between Kippenberger Avenue and Rangiora Woodend Road north of the site and Northbrook Road to the south. The Site in part abuts Devlin Avenue (and associated existing residential development west) on its northwestern boundary and for the balance, residentially zoned land also owned by the Submitter. The Cam/Ruataniwha River flows north to south and forms part of the eastern boundary of the Site. The land beyond the river and the site, to the east, is all privately owned rural land.
- 29 As described, the Cam/Ruataniwha River flows north to south and forms part of the eastern boundary of the site. Here it follows its natural alignment, winding its way from

the north west to the south east and beyond the site. Along this length the Cam/Ruataniwha River is flanked in places by grass banks, a mix of exotic trees (including conifers, willow, and poplar) and some native riparian planting (*Refer to Sheet 11 and 13 of the GA*).

- 30 The Site is generally flat, sloping gradually down to the south east as is revealed by the existing hydrology (open drains) visible. The soil type is generally Temuka deep silt over clay, with permeability being constrained by the clay layer below. The Site has a high water table related to its proximity to the Ashley/Rakahuri River to the north, the clay layer and historical overland flow paths.
- 31 As a farm the ground cover is predominantly grass paddocks and is almost devoid of any trees aside from a couple of *Eucalyptus* trees standing alone. A copse of conifer trees and a lone poplar occupy the northeastern corner of Lot2 DP394668. These are tall (up to approx. 25 metres), mature exotic specimens (poplar, pine, macrocarpa), and along with the *Eucalyptus* add mature rural character to this location but are not high value species or specimens in their own right.
- 32 A mature hedgerow of Hawthorn marks the boundary return with the existing residential development to the west and there is a short length of macrocarpa hedging to the south boundary along Northbrook Road. This appears to be maintained at a height of approximately 4-5 metres. Semi-mature oak trees grow alongside Kippenberger Avenue to the northern boundary of the Site (*Refer to Sheets 14 and 15 of the GA*).
- 33 The vegetation that follows the Cam/Ruataniwha River but located on neighbouring land restricts most views of the Site that are possible from the Rangiora Woodend Road. This vegetation is of value in this landscape both due to their species and as specimens (*Refer to Sheet 15 of the GA*).
- 34 The ecology of the site is described in the evidence of Dr Morgan Tracey-Mines with the vegetation on the site being described as *"highly modified"*⁶. Dr Tracey-Mines concludes that... *"Rezoning is not expected to result in any significant adverse effects on*

⁶ Statement of Evidence of Dr Morgan Tracey-Mines (Ecology) – Page 28

the ecology of the Site. Most of the site has a cover of exotic vegetation with few ecological values⁷.

Land Use, Structures and Existing Features

- 35 As noted, the Site is currently a farm. There are no support buildings present on the Site, although there is a small stock yards located on the Site adjacent to Northbrook Road. The Site 'wraps around' an existing residential dwelling at 23 Kippenberger Avenue and associated curtilage that will remain abutting Kippenberger Avenue. There are two dwellings and associated outbuildings adjacent to the eastern boundary of the Site.
- 36 There is an existing natural spring within the south east quadrant of the Site, with a further '*probable spring*' having been identified at the south end of 100 Northbrook Road, and shown at Figure One⁸ of Dr Tracey-Mines evidence.
- 37 Even though it only runs along the eastern boundary for a short length of approximately 270 metres the Cam/Ruataniwha River is the main landscape feature of the Site. Otherwise pasture grass dominates. Adjacent to the south west corner of the Site the existing stormwater management area with wetlands located south of Goodwin Street appears to be a well-used walking resource with extensive native planting.
- 38 To the east of the Site the landscape character of the receiving environment is one of familiar, pleasant rural countryside, as a result of farming. The finer grain rural residential land use is now an accepted and familiar part of this picture. These appear in locations such as Tuahiwi, Rangiora Woodend Road and lower Gressons Road. Another feature of this wider landscape, particularly further east of the site is the visibility of new townships in what were rural outlooks. This applies to Ravenswood viewed from Gressons Road and Pegasus viewed from State Highway 1.

The Additional Land

- 39 To the east of the Site (and outside of the notified SER DA) the landscape character of the additional 3.3ha of land is the same as that described above. It is quite simply a continuation of pasture covered paddock separated only by a typical post and wire farm fence (*Refer Sheet 18 of the GA*). There is a solitary Eucalyptus tree growing mid-way

⁷ Ibid – Page 29

⁸ Statement of Evidence of Dr Morgan Tracey-Mines (Ecology) – Page 13

along its western edge and the Cam/Ruataniwha River (as described in [37] above) provides an edge to this land at its northeast corner. Along the eastern boundary of the Additional Land the Site interfaces with an existing rural dwelling where mature oak, pittosporums and conifers mark this boundary. This dwelling is orientated to the north and away from the Additional Land. For the balance of the eastern boundary and as it returns along the south east edge of the Site a typical post and wire farm fence demarcates this interface. Beyond this, open paddocks lie.

- 40 There are no distinguishing landscape features on the Additional Land that mark it as any different to the balance of the Site. From all viewpoints the Additional Land appears as a logical extension of the balance of the Site to a well-defined landscape edge, which in part is marked by the Cam/Ruataniwha River.

Views to the Site (including Additional Land) and Description of Existing Edges

- 41 Given its current use, there is no public access onto the Site. Public views to the Site are primarily from Northbrook Road, within the roading and reserve network of the existing residential development to the west, from Kippenberger Avenue and fleetingly (and through trees) from Rangiora Woodland Road. The views (although mostly screened through existing vegetation) from private land are from the neighbouring properties along the eastern boundary of the Site (*Refer to Sheet 11, 13 and 15 of the GA*).
- 42 Northbrook Road allows one of the main views of the Site. From this road, and aside from the short length of macrocarpa shelter belt that blocks views, the Site is open to the road user (*Refer Sheet 12 and 13 of the GA*). The Site has an open character, although when looking west, back dropped by the residential edge of Rangiora.
- 43 Looking east from Devlin Avenue the Site also has an open character and is noticeably rural. A fleeting view of the Site is attained from Kippenberger Avenue, mostly when travelling west. This is through existing roadside oak trees and as one enters Rangiora township.
- 44 Views from those limited private properties to the east, and for the two properties to the south of Northbrook Road, views are primarily truncated by existing vegetation.
- 45 However, from all viewpoints this land, with the exception of the Additional Land, is already identified for future development, so the pertinent issue becomes one of the appropriateness of the proposed edge treatment (where the Site abuts roads and other zones) rather than the existing degree of visibility. Coupled with this is the

appropriateness of any potential visual effects from beyond the Site, arising from the Additional Land being included in the Revised SER ODP.

- 46 The above helps describe the existing edge interfaces within the SER-DA, along with the Additional Land. Essentially the north, south and west boundaries of the Site are defined by roads. To the west the edge is further defined by existing urban form. To the east, a mix of mature rural boundary plantings in associated with two dwellings, the Cam/Ruataniwha River and open paddocks characterise this edge of the Site, inclusive of the Additional Land.

Landscape Values of the Site (including the Additional Land) and Receiving Environment

Physical (natural and human influences)

- 47 The Site has varied physical landscape values centred around the open space, pasture and the presence of Cam/Ruataniwha River. Established trees within the surrounding landscape that contribute to the views enjoyed across the paddocks, are almost entirely located beyond the boundary of the various lots, but they contribute to the physical landscape values of the immediate area.
- 48 Natural character values of the Site would be considered low due to the modifications that have historically occurred, the absence of native vegetation, and the monocultural paddock landscape that now exists. Natural character values are considered moderate in association with the Cam/Ruataniwha River. On the other hand, Rural Character values would be moderate for the same reasons.

Associative (Community, Cultural and Historical associations with the site)

- 49 The duration over which grazing has occurred on the Site establishes moderate associative values with agricultural land use. As I understand there are also mana whenua associations with the general area and in particular the Cam / Ruataniwha River which is identified as Ngā Wai in the pWDP. However, there are no silent files, statutory acknowledgement areas, wahi taonga, wahi tapu or other sites of significance to Māori as part of Bellgrove South.

Perceptual (experiential and sensory perception of the site)

- 50 There is currently no public access into the Site and so visibility of the Site is from locations beyond the Site, from public space and the residential sites west of the site,

except for the outlooks described from the private land along the eastern fringe of the Site.

- 51 The Site is experienced mainly via the partial views that are available from Kippenberger Avenue looking south over the northern portion of the Site (for a distance of approximately 100 metres) and then again when looking north from Northbrook Road over the southern portion of the Site.
- 52 In addition to the above, the Site is most prominent when viewed from Devlin Avenue and the existing houses that front the Site.
- 53 These views currently offer moderate perceptual landscape and rural values when looking over the Site.

THE RECEIVING ENVIRONMENT ANTICIPATED BY THE pWDP

- 54 Both the Site and the surrounding land is to be zoned as RLZ under the pWDP. This provides for 4.0ha lots to be developed as a controlled activity in accordance with Activity Rule SUB-R2, resulting in six to seven lots to be developed on the Site.
- 55 The built form standards of the RLZ comprise maximum dwelling heights of 8.0m above ground level and 12m for other buildings and structures, setbacks for dwellings of 20m from either a road boundary or internal boundary and a maximum limit on the floor area of any single building or structure of 550m² while not exceeding 20% of the net area of any allotment. There are no restrictions on boundary treatments and no requirements for landscape mitigation to be undertaken.
- 56 The site is also located within the SER-DA, which is an area specifically identified as an area suitable for future residential development. Sitting within the northern portion of the SER-DA the notified SER-ODP anticipates a future land use akin to that anticipated by the General Residential Zone (**GRZ**) of the pWDP (*Refer Sheet 8 of the GA*).
- 57 The built form standards of the GRZ comprise typically a single dwelling on each site with a maximum dwelling height of 8m above ground level and site a site coverage not exceeding 45% of the net area of any allotment. Boundary treatment must be as per GRZ-BFS8 which stipulates boundary fencing along road boundaries is to be a max height of 1.2m or if between 1.2 and 1.8m then 45% of the fence must be permeable.
- 58 Under both the operative and proposed district plans, the Cam/Ruataniwha River is required to have a 20m esplanade reserve on both sides of the river. This is to be vested

in WDC as Local Purpose (Esplanade) Reserve. The planning provisions in the WDP and pWDP require the esplanade reserve for the Cam/Ruataniwha River to be used for conservation and natural hazard mitigation purposes.

59 Under Scheduled Natural Character Freshwater Bodies (Schedule 2) of pWDP, the Cam/Ruataniwha River has been identified as a scheduled natural character freshwater body. An aerial plan in Schedule 2 shows the Cam/Ruataniwha River extending down part of the eastern boundary of the Site.

60 Notwithstanding the RLZ of the Site and surrounding land, various planning documents including the pWDP have ear-marked East Rangiora (including most of the Site) for future urban development. I have described this at paragraphs nine and 26 above and will not repeat that detail again here.

THE PROPOSAL

61 Bellgrove seeks to rezone the full extent of Bellgrove South from RLZ to MRZ in the pWDP. Excluding Lot 4 DP 25508 (100 Northbrook Road) which is already proposed to be zoned MRZ as part of Variation 1, this is an area of approximately 31.2 ha (the Site).

62 No actual land use change, subdivision or soil disturbance is proposed as part of the rezoning.

63 Included within this rezoning request is a 3.3ha area of 'Additional Land' currently located to the east of (outside) the notified SER-DA. This is part of Lot 2 DP 452196, a 14-ha lot held by Bellgrove and contained within Record of Title 577722. This title is partially included within the area identified as the SER DA in the pWDP.

64 BRL also seeks changes to the notified SER-ODP (*Refer Sheet 9 and 10 of the GA*) to provide a better development outcome with those of relevance to this evidence being:

(a) Inclusion of the area of Additional Land within the SER-ODP; The SER-DA and the notified SER-ODP do not cover a small 3.3ha triangular portion of the eastern extent of site (Lot 2 DP 452196 – 74 Northbrook Road) that extends beyond the SER-DA boundary towards the Cam/Ruataniwha River. It is proposed to extend the area identified as SER-DA to include this Additional Land on the basis that this would extend the boundary to a robust landscape or cadastral boundary;

(b) Identification of all the residential land as MRZ;

- (c) Changes to the indicative road layout to comprise a single north/south primary road and extend the two secondary east/west roads east into the area of Additional Land;
- (d) Changes to the open space network to include the provision of a stormwater management area (**SMA**) and associated reserve within the southern portion and south-eastern corner of Bellgrove South (approximately 6.5 ha in size) along with the extension of reserve space along the eastern boundary; and
- (e) Changes to the green link including the shift of the east/west green link shown on the notified SER-ODP southwards to connect with the Truman Road extension and SMA. This is coupled with an additional green space / link along the eastern boundary, both with the Cam/Ruataniwha River and as an interface with adjacent landowners beyond the Site.

65 Overall, as shown on the Revised SER-ODP the proposal will comprise medium density residential development, roadway connections to Kippenberger Avenue, Northbrook Road, and Devlin Avenue, along with Cassino and Truman Streets. Pedestrian and cycle connectivity, a central open space reserve, a Cam/Rutantiwha River open space reserve with associated green link, and a SMA in the south east portion of the site.

66 In addition, I note that whilst not shown on the Revised SER-ODP, I understand that future development of the Site would require lot levels to be raised up to approximately 1.0m higher than existing ground in the south of the Site. As I understand, this would gradually increase to this height from north to south across the Site. I do note from onsite observation that Northbrook Road sits approximately 800mm - 1.0m above the surrounding farmland. As currently proposed, siteworks and levels will have low visual effects for the residential lots when viewed from beyond the Site with the main reason for this being that the proposed raised site levels will generally correspond to existing levels immediately beyond the Site. In other words, the Site will not be sitting higher than adjacent land. This degree of effect can be effectively mitigated through landscape treatment and consideration as part of the overall design of future subdivision and road interfaces.

Density

67 Rezoning the Site MRZ would enable a density of 15.6hh/ha with an anticipated yield of approximately 437 residential allotments to be realised based on an initial concept

lot layout plan. This is across all Bellgrove South (including the Additional Land and the already zoned land at 100 Northbrook Road that provides for 74 of the allotments). I note that this is a concept plan and that the final density will be affected by issues such as public space, road reserve configuration and the like.

Connections and Blue Green Networks

68 Connectivity essentially comprises the following:

- a) Single North South Primary Road: Retain the Devlin Avenue extension as a primary road with cycleway between Kippenberger venue and Northbrook Road as shown the notified SER-ODP.
- b) The second north / south road between Kippenberger Avenue and Northbrook further east is proposed to be a secondary road. As with the BRL submission it is requested that it be realigned slightly west than the north/south road shown on the notified ODP to improve setback distances from the intersection with Golf Links Road and ensure it is located within the Bellgrove South landholding.
- c) Secondary Roads: Retain the location of the two secondary east/west link roads (one an extension of the existing Gelatos Street / Truman Street and the other an effective extension of Casino Street) shown on the notified SER-ODP. The Bellgrove South ODP shows the inclusion an additional north/south connection to the east within the additional land area connecting the two secondary roads shown.
- d) The removal of the three shown green links on the notified SER-ODP, to be replaced with the inclusion of two new green links:
 - i. A new north-south green link adjacent to the Cam/ Ruataniwha River and eastern boundary extending south to Northbrook Road; and
 - ii. A new east-west green link from Truman Road extension road connection to the stormwater reserve

69 These connections provide opportunity for landscape development, and I recommended a comprehensive landscape framework for the Site be developed as part of subdivision consent to ensure appropriate landscape character is achieved and existing landscape values enhanced.

70 As shown on the Revised SER-ODP, the framework of pedestrian and cycle connections throughout the Site is partly based on the roading network and partly in relation to the

open space and stormwater reserve spaces proposed for the Site. This connectivity for pedestrians and cyclists will improve the experience, and hence the perceptual landscape values of the Site.

- 71 It is worth noting that additional cycleway connections will likely be established as part of subdivision consent (for example an east/west cycleway connection as part of the Cassino Street extension).

Blue Green Networks – Open Space and Stormwater Reserves

- 72 This network includes walkway reserves separate but complementary to the road network, green links within the road network, one proposed neighbourhood reserve, a SMA, and an esplanade reserve alongside the Cam/Rutaniwha River. As shown on the Revised SER-ODP this network comprises:

- a) Removal of the southern portion of the Recreation Reserve shown centrally on the notified SER-ODP and a relocation of this reserve directly south of the intersection of two secondary roads (a shift north to acknowledge the extent of stormwater reserve provided in the south of the Site).
- b) Inclusion of open space reserve along the length of the Cam / Ruataniwha River boundary and connecting through to the stormwater reserve location in the south.
- c) Inclusion of a stormwater reserve within the southern portion and south eastern corner of Bellgrove South.

- 73 From a landscape values perspective the blue green/ open space reserve network offers the opportunity to improve physical values through habitat creation, associative values through site identity and site narratives, and perceptual values through site experience i.e. recreating and prospect over these spaces.

Landscape Attributes and Sites of Significance

- 74 As discussed previously the landscape attributes of the Site are limited and it is devoid of any sites of significance. From a landscape perspective, aside from its existing open character and farming history (that are anticipated to change), the main existing attributes of the site are associated with the Cam/ Ruataniwha River.

- 75 The Cam/Ruataniwha River will be protected and have ecological opportunities and habitat values potentially enhanced under this proposal. While the trees along this river

contribute to the landscape character of the Site, they do this through association as they are not on the Site.

- 76 While the Cam/Ruataniwha River is identified as Ngā Wai in the pWDP, as I understand the cultural narratives are as yet uncharted because input has not yet been obtained from Mahaanui Kurataiao Limited (MKL). There may be opportunity to start that narrative and explore how that intertwines with the other values and features of the Site including the social and historical stories centred around past land uses.

RELEVANT PLANNING PROVISIONS

- 77 The statutory documents containing provisions relevant to the proposal are found in the Resource Management Act 1991 (**RMA**), National Policy Statements (**NPS**), Canterbury Regional Policy Statement (**CRPS**) and the Proposed Waimakariri District Plan (**pWDP**).
- 78 My evidence focuses on the statutory provisions under the pWDP, specifically, the objectives, policies, and assessment matters that give effect to the higher level statutory documents as relevant to landscape and visual character.

National Policy Statements

- 79 Regarding National Policy Statements, a discussion and assessment of those relevant to this proposal are contained in the evidence (Planning and Ecology) of others. In a nutshell the NPS on urban development, highly productive land, indigenous biodiversity, and freshwater are relevant.
- 80 Regarding landscape and visual matters, I do not intend to specifically address the proposal against the relevant National Policy Statements, except to note that the National Policy statement on Urban Development (**NPS—UD**) is relevant in that envisages changes to existing amenity values and Policy 6⁹ specifically provides for this.
- 81 Bellgrove South represents the opportunity for a comprehensively designed extension to Rangiora, as envisaged by several higher order planning documents including Our Space, Map A of the CRPS, the GCSP along with the SER-DA. Overall, even though this proposal will result in an increase in built form, this will appear logical in the context of

⁹ National Policy Statement on Urban Development – MfE and Ministry of Housing and Urban Development, updated 8 June 2023

its setting and will not unacceptably adversely affect the visual amenity experienced from surrounding public places and neighbouring properties.

Canterbury Regional Policy Statement

- 82 'Map A - Greenfield Priority Areas and Future Development Areas' within the CRPS identifies the Site (except for the area of Additional Land) for future development. Chapters 5 and 6 of the CRPS contain provisions focused on ensuring that development is consolidated around existing urban areas, achieves compact urban form, maintains the natural environment, that urban development is avoided outside existing or identified future urban areas, and maintains the character and amenity of rural areas and settlements.
- 83 The provisions relating to landscape within Chapter 12 of the CRPS are also considered relevant. While Chapter 12 focuses on Outstanding Natural Landscape/Features (**ONL/F's**) it also notes that other landscapes may be important in relation to amenity and District Plans may appropriately include provisions in relation to these.
- 84 When considering Objective 12.2.2 *Identification and management of other landscapes* and Policy 12.3.3 *Identification and management of other important landscapes* the key landscape and visual amenity matters to be addressed relate to the identification and management of natural character and/or historic cultural landscapes or historic heritage landscapes along with amenity landscapes which are important to local communities.
- 85 Overall, from a landscape and visual perspective the Bellgrove South proposal is considered to be consistent with the pertinent landscape and urban development guidance contained within Chapters 5, 6 and 12, while also being a development proposal which will not compromise the essence of the wider Lower Plains landscape.

Proposed Waimakariri District Plan (pWDP)

- 86 The following provisions are relevant to the proposed rezoning as they are contained within the pWDP. The pWDP Strategic Directions, Objectives and Policies are required to give effect to the higher order documents as required by the RMA.
- 87 The provisions pertinent to this submission within the pWDP related to district wide landscape matters are as follows:
- a) Subdivision Objectives and Policies
 - Subdivision Design (SUB-O1)

- Esplanade Reserves and Esplanade Strips (SUB-O3)
 - Design and Amenity (SUB-P1)
 - Integration and Connectivity (SUB-P4)
 - Density in Residential Zones (SUB-P5)
 - Criteria for Outline Development Plans (SUB-P6)
 - Access to, Protection and Enhancement of the Margins of Water Bodies (SUB-P9)
 - Esplanade Reserves and Esplanade Strips (SUB-P10)
- b) Strategic Directions Objectives
- Natural Environment (SD-O1)
 - Urban Development (SD-O2)
 - Ngai Tahu Mana Whenua/Te Ngai Tuahuriri Runanga (SD-O5)
- c) Urban Form and Development Policies
- Managing reverse sensitivity effects from new development (UFD-P10)

ASSESSMENT OF VISUAL AND LANDSCAPE EFFECTS

Potential Issues

- 88 The potential visual and landscape effects are the visibility of future medium density residential development when seen from Kippenberger Avenue and Northbrook Road as well as from Devlin Avenue and the change in character from existing rural to residential and the protection and enhancement of the existing landscape values.
- 89 An assessment of such effects must consider the context of the Site. The area surrounding the Site is currently undergoing change. The pWDP now proposes this wider area, including the Site to be rezoned RLZ. In response to demand and future planning strategies, the eastern fringe of Rangiora has also been identified as a preferred area for residential expansion and a SER-DA overlay covers this area.
- 90 Bellgrove North within the NER-DA north of the Site and to the other side of Kippenberger Avenue, is currently under development in accordance with the consent approved under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for 198 residential lots. Further, all of Bellgrove North is zoned MDZ under Variation 1 to the pWDP.
- 91 With the site and wider area zoned RLZ as part of the pWDP, this would allow for the subdivision of this area into 4.0ha lots as a controlled activity. However, the notified SER-ODP identifies most of the Site and the wider ODP area for medium residential

density development with the eastern triangular shaped Additional Land being excluded and remaining RLZ.

Assessment of Visibility, Visual and Landscape Effects

92 When considering the potential effects arising from the relief sought by BRL on the Site this assessment covers two broad categories, the visual effect¹⁰ and the landscape effect¹¹.

93 To aid with the comparison of effects and therefore being able to describe and assess the changes or differences, the various outcomes are discussed relating to the various viewing locations. Consideration is given to the potential effects of the Bellgrove South-ODP in comparison to the notified SER-ODP, as well as those potential effects arising from the MRZ sought by BRL across the full extent of Bellgrove South (inclusive of the Additional Land) when compared to the notified RLZ.

94 The GA includes a View Location Plan (*Refer Sheet 11 of the GA*) followed by a number of relevant site photographs (*Refer Sheet 12 – 19 of the GA*) that capture the primary views that would be possible of the Site.

95 The primary viewing locations would be;

- Kippenberger Ave
- Northbrook Road
- Devlin Avenue and associated residential lots and
- The rural land located east of the Site.

96 It is important to appreciate that change to the character of a landscape is not necessarily adverse. Whether effects are adverse or not depends largely on context of the site and the public expectation of what can be reasonably anticipated to occur in the landscape and the level of integration that can be achieved to make future

¹⁰ A visual effect is a kind of landscape effect. It is a consequence for landscape values as experienced in views. *Visual effects are a subset of landscape effects. A visual assessment is one method to help understand landscape effects.* "Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines". Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022.

¹¹ A landscape effect is a consequence of changes in a landscape's physical attributes on that landscape's values. Change is not an effect as landscapes are constantly changing. It is the implications of change on landscape values that is relevant." "Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines". Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022. Page 135

development appear 'appropriate' or, in other words, an accepted or supported part of a growing urban precinct.

The Effects of Rezoning to MRZ and Developing the Site in Accordance with the Revised SER ODP Proposed by BRL

97 The proposed residential zoning and residential intensification will alter the existing urban form and landscape of the South-East Rangiora area. However, in the context of the higher order planning documents and the SER-DA in the pWDP, that signal future urban development on the Site, albeit not on the Additional Land, I consider the rezoning of Bellgrove South as shown on the Revised SER ODP, will enable the comprehensive development within South-East Rangiora in accordance with these higher order planning documents.

98 Development on the Site in a manner that complies with the MRZ performance standards outlined in the pWDP constitutes a reasonable revision of the traditional or standard approach and this 'new look' development may initially receive mixed reactions but as this density of development becomes more common and familiar with time, it will become more accepted. It also aligns with the proposed MRZ as part of Variation 1 on Lot 4 DP 25508 (100 Northbrook Road) and MRZ proposed for Bellgrove North under Variation 1.

99 Under MRZ, development may include three storey units being developed in places and the new density stemming from sections as small as 200m². The MRZ is a departure from what would up to now be considered a 'normal' or traditional and familiar residential development for Rangiora and this difference in itself may create an effect some would consider to be adverse¹².

100 Policy 6 of the NPS-UD anticipates this scenario as it directs decision-makers to have particular regard to...." *that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*

- (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities,*

¹² The use the term medium to describe a development density of potentially 200m² can be misleading in the rural context of the site as traditional development (with sections around 600m²) is familiar and is already considered to be relatively dense.

and future generations, including by providing increased and varied housing densities and types; and

(ii) are not, of themselves, an adverse effect.

101 In this regard, while the proposed MRZ will give rise to a perceived denser fine grain of residential development when compared to a RLZ development, the revision sought to the SER-ODP related to the Site has been carefully designed to best integrate with the adjacent NER-DA and SER-DA's, as well as the residential/rural boundary. This has been achieved through:

- a) appropriate boundary treatment to the residential/rural boundary along the Sites eastern boundary. This includes an approximately 1.32ha green link/esplanade reserve at the Sites eastern most extent;
- b) an approximately 6.5ha of SMA within the south east corner of the Site that in effect continues the proposed green edge along the Sites eastern boundary which abuts Northbrook Road and in doing so provides a 'green outlook' for the users of Northbrook Road for approximately 50% of its length adjacent to the Site. It is worth noting that the notified SER-ODP did not include any stormwater reserve; and
- c) integration through co-located areas of medium residential density which provides sensible outcomes as the area develops.

102 When viewed from Kippenberger Ave and Northbrook Road as well as Devlin Avenue, visually the open rural landscape and the expansive long views that are currently enjoyed would be impacted on through development enabled by MRZ by replacing the open paddocks that currently exist.

103 It is noted that the higher-level planning documents anticipate a change to existing landscape character of the Site and change would occur in the context of the wider SER-DA and NER-DA also changing. Notwithstanding that MRZ will enable a greater intensity of built form development than envisaged by the notified pWDP, under the pWDP, the proposed RLZ anticipates the compartmentalisation of the landscape, introduces an increase in residential housing with a fragmented grain of rural residential development replacing existing open grazed rural land.

- 104 Furthermore, under the RLZ, there are no requirements to address any impacts that stem from a 4ha development. However, it is acknowledged that typically amenity arising from RLZ development is generally high resulting from the combination of open space and vegetation that develops overtime.
- 105 The source of amenity arising from a MRZ over the Site will be different and the anticipated character 'dynamic'¹³. This would arise through a combination of a variety of housing types, a MRZ policy framework that provides for *"high quality building and landscape design for multi-unit residential development with appropriate streetscape landscaping and positive contribution to streetscape character"*¹⁴, along with an opportunity for a comprehensive urban development that will afford opportunity for a blue green network and connection to the wider Rangiora urban development. Such connections aren't necessarily enabled by a RLZ.
- 106 From a landscape and visual perspective, the effects of a MRZ over the Site, as compared to a RLZ will be quite different. However, future development enabled by a MRZ will be viewed in the context of logical urban form extension to the existing urban fabric of Rangiora. The Site offers a sense of containment through its geographical location (wedged between the existing edge of Rangiora and the Cam/Ruataniwha River) and with appropriate interface treatments, coupled with the provisions of the MRZ in the notified pWDP, the effects can be appropriately managed.

The Effects Arising from the Inclusion of the Additional Land within the Revised SER-ODP and proposed rezoning to MRZ

- 107 The eastern extent of the notified SER-DA coincides with the eastern cadastral boundary of Lot 1 DP 80275 north of Cam/Ruataniwha River. To the south, the notified SER-DA boundary ignores both cadastral and visible landscape related boundaries across both Lot 2 DP 452196 (that forms part of the Site) and the neighbouring Lot 2 DP 306045 to the south.
- 108 This seemingly random boundary location excludes a 3.3ha triangle of balance land of Lot 2 DP 452196 zoned RLZ and BRL wish to include this Additional Land in Bellgrove South as shown on the Revised SER-ODP (*Refer Sheet 9 of the GA*). This balance area

¹³ PWDP – Medium Density Residential Zone (MRZ), Introduction, notified 22 February 2024

¹⁴ PWDP – MRZ -P3, Residential Character (3)

is sized below the permitted lot size for RLZ and for some reason, when one considers the landscape context, is not explicitly provided for as an area of identified future residential greenfield growth in the higher order planning documents.

- 109 The eastern boundaries of this portion of land are the Cam/Ruataniwha River boundary along its north-eastern boundary and an existing cadastral boundary forming its south-eastern boundary, both robust and definitive.
- 110 Considering the impact of development facilitated by the Bellgrove South ODP on the balance land of the Site, the implications of the inclusion of the Additional Land, and with a MRZ, would be similar to those as described above. The Additional Land is landlocked and is currently experienced (viewed) from beyond the Site as part of the Site. In saying that I mean there are no elements (hedgerows, landform, built structures) within the existing landscape setting of the Site that physically or visually separates the Additional Land from the rest of the Site when viewed from Kippenberger Avenue, Northbrook Road and from Devlin Avenue.
- 111 When consideration is given to the outcome of RLZ on the Additional Land and as compared to that shown on the Revised SER-ODP, a larger 3.3ha site will exist at the eastern extent of the SER-DA. This is likely to be developed as a rural residential development and would potentially provide a 'buffer', although somewhat dislocated and fragmented to the existing rural living to the east of the Site. In a way this would still visually extend development to the east and to existing natural or cadastral boundaries.
- 112 The Revised SER-ODP proposed by the submitter seeks to extend the boundaries of the SER-DA to include this small parcel of land and so take residential development enabled by MRZ to the cadastral and natural boundaries at its eastern end. Potential landscape and visual effects arising from this will be primarily associated with building height, reduced boundary setbacks and built form density.
- 113 Due to the limited potential that exists for viewing this isolated area of Additional Land from Kippenberger Avenue, Northbrook Road and Devlin Avenue, the implications of such an extension to the SER-DA boundaries and a MRZ, and in the context of the changes anticipated within the wider area, the effects of such an extension is considered to be low. Essentially it will not be seen from these aforementioned public viewing locations.

- 114 However, the key consideration in terms of potential landscape visual effects, is adverse effects on the surrounding environment to the east from the extension. In my opinion, as well as the Additional Land being 'visually tucked away' from most views from the east, potential adverse effects can be appropriately mitigated through the retention of existing vegetation where appropriate along the eastern boundary of the Additional Land in combination with the proposed open space zoning as shown the Revised SER-ODP.
- 115 The open space zoning over the Additional Land as shown on the Revised SER-ODP includes esplanade reserve provision, green links and to the south east corner part of the SMA. As shown, this open space will lie between future built form enabled by MRZ and the eastern boundary of the Additional Land, and thus the extended SER-ODP. At its minimum this 'green interface' will be 20 metres in width and will provide sufficient space for the establishment of vegetation, that will physically and visually separate future development from the rural land to the immediate east and in particular the one dwelling immediately adjacent to the eastern boundary of the Additional Land.
- 116 While the effects arising from the inclusion of the Additional Land in the revised SER-ODP will be different to those if this land was retained as RLZ, for the reasons outlined above these effects can be appropriately mitigated. Simply, from a land planning perspective this proposed extension makes sense in this location.

The Effects Arising from the Bellgrove South-ODP in Comparison to the Notified SER-ODP

- 117 In addition to the transport planning, ecological and environmental support given to the rezoning and SER-ODP revisions sought provided by other expert witnesses, essentially the revised SER-ODP has been designed as a 'best practice' example of MRZ development with strategies proposed to ensure that integration into its existing context is assured (albeit with evidence of change).
- 118 In addition, the wider locality will benefit from an improved and integrated open space and green network connections as shown on the Bellgrove South ODP and the Revised SER-ODP. These mesh well with and extends those adjacent. The proposed blue green network will combine well with pedestrian cycle networks and stormwater connections.
- 119 By doing this a better connection with the Cam/Ruataniwha River is afforded as there was no connection shown on the notified SER-ODP. The notified SER-ODP shows a

green link to the north of the one shown on the Bellgrove South ODP, and in that location connects with a centrally located open space and Devlin Avenue to the west.

- 120 The Bellgrove South ODP proposes a green link to an eastern boundary green link/reserve that leads to the Cam/Ruataniwha River and associated esplanade reserve. As shown on the Bellgrove South ODP this link also connects with the proposed SMA and at its western end provides a connection with Truman Road and the associated stormwater reserves and co-located walkway. This provides a greater walking and cycling opportunity as compared to the notified SER-ODP.
- 121 As compared to the notified SER-ODP the Open Space Reserve as shown on the Bellgrove South ODP is further north and more centrally located within Bellgrove South. In this location it is more equitable in distance for future users.
- 122 In summary, in my opinion the Bellgrove South ODP and the Revised SER- ODP is a logical development from the notified SER-ODP with several effective improvements and opportunities in terms of landscape values.

Summary of Effects on the Landscape Values of the Site

- 123 In terms of addressing the physical, associative, and perceptual values of the Site, the following summary is provided:
- (a) The existing physical values are found principally in the rural and natural character which are expressed by an open pastoral character, and existing water courses that also contribute to the perceptual values particularly found in the north east part of the site.
 - (b) The revised SER-ODP will afford protection and enhancement to these landscape values, incorporating blue green network links combined with recreational opportunities.
 - (c) The associative values can potentially be captured through consultation with Mahaanui Kurataiao Limited prior to subdivision development. This may provide an opportunity to highlight a cultural narrative over the site to maintain and or benefit associative values.
- 124 Changes to rural and natural character are inevitable on any proposal of this nature. Landscape change is not an effect in itself as landscapes are always changing. It is the effects of the change that are important. In the overall context, they are appropriate.

ASSESSMENT AGAINST THE RELEVANT PLANNING PROVISIONS

- 125 The relevant provisions for the proposed rezoning are under the pWDP Part 2 – District Wide Matters that relate to Strategic Directions, Historic and Cultural Values and Subdivision.
- 126 With regards to subdivision, the pWDP encourages best practice subdivision design that is illustrated by an ODP that shows;
- The subdivision achieves an integrated pattern of land use, development and urban form that consolidates urban development and maintains rural character except where the area is identified by WDC as being required for urban development.
 - The provision of esplanade reserves that contributes to the protection of conservation values, public access along rivers and enables public recreational use where this is compatible with conservation values and uses landscape to manage reverse sensitivity effects.
 - Recognises, protects and maintains the district’s historic heritage.
 - Provides best practice urban development including recognising existing character and amenity values.
 - Provides a net gain in indigenous ecosystems and habitat, and
 - Recognises Te Ngai Tuahuriri Runanga’s role in the management of natural and physical resources.
- 127 The MRZ shown on the Bellgrove South ODP are largely contained within the boundaries of the site by Devlin Avenue along its western edge, Kippenberger Ave and the Cam/Ruataniwha River down the north and north-eastern boundary and the approximately 6.5ha extent of SWA forming the bulk of the south eastern boundaries of Bellgrove South. All these elements will provide good separation and/or buffering to adjacent areas, particularly to the east that will provide mitigation to the effects resulting from the increase in both density and allowable heights of new dwellings.
- 128 The Revised SER-ODP conforms with the requirements of the pWDP. This particularly relates to roading, management of stormwater systems, environmental or landscape protection and enhancement, identification of existing features, pedestrian and cycle ways and minimisation of reverse sensitivity.

- 129 The Revised SER-ODP also provides opportunities along the Cam/Ruataniwha River corridor that caters for the enhancement of indigenous ecosystems and habitat. The transport network is efficient, is looking to accommodate public transport, connects well both internally and externally and prioritises walking and cycling. The existing character and amenity are recognised in the Revised SER-ODP and augmented or protected.
- 130 Te Ngai Tuahuriri Runanga's role in the management of natural and physical resources, while not recognised yet, can be through MKL. This potentially provides the opportunity to create a narrative based on mana whenua input, further respecting and illustrating the character and landscape values of the site.

CONCLUSION

- 131 I consider that the visual and landscape effects of future residential development in accordance with MRZ and the Revised SER-ODP are in line with the notified SER-ODP or are well mitigated and offer landscape benefits in connectivity, urban quality, and protection of existing landscape features. In general, the proposal is consistent with the landscape provisions of the pWDP.
- 132 The inclusion of the Additional Land in Bellgrove South provides a rational and logical basis for the completion of the future urban form of the eastern edge of Rangiora in this location. The potential adverse effects arising from this can be appropriately managed and this is provided for by the Revised SER-ODP.
- 133 Overall, I conclude that the Site (including the area of Additional Land) can be appropriately rezoned MRZ from a landscape and visual character perspective.
- 134 Thank you for the opportunity to present my evidence.

Tony Milne

30 April 2024

APPENDIX A:Table 1: Landscape and Visual Effects Rating Scale¹⁵

Very Low	Low	Low to Moderate	Moderate	Moderate to High	High	Very High
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¹⁵ The seven-point scale of very low to very high is in accordance with the New Zealand Institute of Landscape Architects Te Tangi a te Manu – Aotearoa New Zealand Landscape Assessment Guidelines, April 2021.

APPENDIX B:

Refer A3 Bellgrove South Graphic Attachment, dated 30 April 2024.