

Before the Independent Commissioners appointed by the Waimakariri District Council

In the matter of the Resource Management Act 1991 (**the Act**)

and

In the matter of Proposed Private Plan Change 31 (PC31) to the
Waimakariri Operative District Plan by Rolleston Industrial
Developments Limited

**Statement of evidence of Kim Thomas Goodfellow on behalf of
Waimakariri District Council (as Submitter) - Landscape**

Dated: 21 July 2023

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Evidence of Kim Thomas Goodfellow:

Introduction

1. My full name is name is Kim Thomas Goodfellow.
2. I have been engaged by Waimakariri District Council as Submitter (“WDC”) to prepare this statement of evidence in relation to their submission on Private Plan Change 31 to the Waimakariri District Plan (“PC31” and “ODP”).

Experience and qualifications

3. I am a landscape architect and masterplanner and work in my own company; The Goodfellow Group Limited which was established in 2013. I hold a Bachelor of Landscape Architecture Lincoln University. I am a Registered Member of the New Zealand Institute of Landscape Architects.
4. I have more than 20 years' experience working in the areas of landscape architecture and urban development.
5. My work has included designing and leading a wide range of projects, including masterplans/development frameworks, large infrastructural projects, providing landscape peer review services through to comprehensive design packages for various project types. These projects include:
 - 5.1. Landscape Peer Review for Ohiwa Residential subdivision - Ōpōtiki District Council
 - 5.2. Masterplanner for Naval Point Redevelopment, Lyttelton – Christchurch City Council (with Richard Knott Limited)
 - 5.3. Urban design leader for the Christchurch Northern Corridor Alliance (CNC) – Waka Kotahi New Zealand Transport Agency
 - 5.4. Landscape architect for Papakura Town Centre - Papakura Local Board (with Richard Knott Limited)
 - 5.5. Landscape design leader for Christchurch Southern Motorway Stage 2 (CSM2) – Waka Kotahi New Zealand Transport Agency
 - 5.6. Designing and authoring a masterplan for Ōpōtiki Harbour and Wharf – Ōpōtiki District Council (with Richard Knott Limited)

- 5.7. Designing and authoring Waihou Bay Masterplan – Ōpōtiki District Council (with Richard Knott Limited)

Involvement in PC31

6. In 2022 I was appointed by Waimakiriri District Council to provide a review of the DCM landscape assessment as captured in the memo dated 23 July 2022 and which included visiting site (copy **attached** as **Appendix 1**).
7. In preparing this evidence I have reviewed the relevant landscape matters relating to PC31 to the Operative Waimakiriri District Plan (operative WDP) and reviewed the following material:
- 7.1. Ōhoka Plan Change Request, Novo Group June 2022
 - 7.2. Appendix E, Landscape and Visual Assessment, 535 Mill Road Plan Change, Ōhoka, DCM Urban, 21 February 2022
 - 7.3. Evidence of David Compton-Moen 7 July 2023
 - 7.4. Evidence of Hugh Anthony Nicholson June 2023
 - 7.5. Evidence of Tony Milne 7 July 2023
 - 7.6. Operative Waimakiriri District Plan
 - 7.7. Waimakiriri 2048 District Development Strategy 'Our District Our Future' (2018)

Code of conduct

8. 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. 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

9. My evidence will provide comment on the landscape evidence prepared on behalf of the plan change Applicant from Mr Compton Moen and Mr Milne, and also the landscape evidence from Mr Nicholson prepared on behalf of Waimakiriri District Council. Specifically, this will relate to;

- Effects on the rural character of Ōhoka
- Refinements and amendment to the PC31 proposal, and mitigation measures (MMs)
- Anticipated District Plan Development

Summary of evidence

10. In summary, I consider the proposed Plan Change which seeks to introduce 845 dwellings into this rural environment is of a density that is suited to residential subdivision in an urban setting, and is not consistent with the rural village character of Ōhoka. This proposal will not maintain but instead significantly reduce the rural character of this Ohoka settlement. In this regard I support my original assessment of the Plan Change.

Evidence of David Compton-Moen

11. I have reviewed the landscape and visual impact assessment evidence prepared by DCM Urban (7 July 2023). My previous review (2023) of the PC31 landscape assessment requested more information such as a lot arrangement plan and visual simulations, which are considered useful tools to help communicate the Plan Change proposal in terms of landscape matters. The revised landscape package from DCM Urban (7 July 2023) included a lot layout (Illustrative Master Plan) and visual simulations of the proposed development. This additional information is acknowledged and appreciated and is referenced in my comments below.
12. Mr Compton-Moen's assessment of landscape effects can be summarised by the following statements:

'Any effects on landscape character and amenity effects on existing and future residents can be successfully addressed through the proposed mitigation measures'¹

'I consider that it is possible to maintain and enhance the rural village character of Ōhoka even with an increased size and population'².

¹ Evidence of Dave Compton-Moen - Page 4

² Evidence of Dave Compton-Moen - Page 16

Overall, I consider that the proposed extension to the Ōhoka settlement will contribute to a well-functioning urban environment with any adverse effects on landscape character and visual amenity successfully mitigated³.

13. I have also reviewed the proposed mitigation measures (MM1 to MM10). These MMs are largely the same as previously proposed, with the exception of an additional screen planting treatment (MM9) and road threshold treatment (MM10). Overall, I agree that these measures would enhance the landscape amenity of the overall proposal and also provide some visual screening. However, it is important to recognise that an important attribute of the rural character of Ōhoka is derived from its pattern of low density housing. This critical issue of the loss of character that will occur as a result of the proposed high density of dwellings has been raised as a significant concern in numerous submitters (502, 428, 590, 518, 242, 420) and highlighted in Mr Nicolson's evidence. The S42A report also clarifies that 500m² sections are not consistent with the surrounding context of a rural environment⁴. I concur with these findings.
14. While the proposed mitigation measures MM1 to MM10 help to enhance general landscape amenity, these measures will fail to mitigate the adverse effect on the Ōhoka settlement character from introducing 845 dwellings of an urban density into this rural environment.

Evidence of Tony Milne

15. On the subject of potential loss of rural character, Mr Milne's evidence includes two theoretical subdivision layouts (Anticipated District Plan Development) and states:

'...These lifestyle layouts simply demonstrate a continuation of the existing development patterns in the surrounding area, and the PWDP Lifestyle Zone maintains this pattern⁵.'

'In either of the indicative lifestyle concept scenarios the result will be the fragmentation of a larger land holding into a potential yield of 36 lifestyle lots, which in turn will add to the proliferation of "finely textured lot boundaries and shelter planting, mailboxes, mown roadsides, entrance gates, houses and buildings resulting

³ Evidence of Dave Compton-Moen, Page 16.

⁴ Section 42A report, Page 30

⁵ Evidence of Tony Milne (Landscape), Page 5.

in an enclosed landscape” that has already occurred in the vicinity⁶.

16. I agree this comparison with ‘status quo’ type developments might be used to draw attention to the enhancements of the PC31 proposal in terms of landscape amenity – i.e. less driveways, less letterboxes etc – however these theoretical enhancements are of marginal relevance given:

16.1. the theoretical subdivision layouts comprise of (minimum) 4 hectare sized lots, which is vastly different to the 500m² lots which are shown in the PC31 Masterplan (i.e. 20 times the density) which is of a density that would fail to protect the rural character of Ōhoka.

16.2. A 4 hectare lot may be able to practically incorporate rural activities (as required by PWDP Rural Lifestyle Zone) whereas 500m² lots as proposed by PC31 would not accommodate rural activities.

17. I totally agree with the comment of submitter 502 which summarises the PC31 proposal in terms of effects on the existing character in the following statement: *‘it is not possible to add 850+ small lot properties into the heart of an established and thriving semi-rural community while still remaining in keeping with the character of the village⁷’*. If granted, this proposal will completely transform the existing rural character of Ōhoka.

18. Mr Milne then presents the amendments to the PC31 application (WDC PC31 Refinement) in terms of landscape issues:

‘The WDS PC31 details have been refined to better integrate with the surrounding locality and also reduce adverse effects,.... and which have a positive influence on the landscape outcomes⁸’.

‘With the refinement of the PC31 ODP and Planning controls, I consider the overall landscape and visual amenity outcomes are consistent with the initial conclusions made by Mr Compton Moen and the further conclusion he draws in his evidence⁹’.

⁶ Evidence of Tony Milne, Page 5.

⁷ PC31 Section 42A Report, Page 29.

⁸ Evidence of Tony Milne (Landscape), Page 6.

⁹ Evidence of Tony Milne, Page 8.

19. Similar to my comment in 8.2 above, while details of the amendment has features that will enhance visual amenity, these amendments are insufficient to mitigate the loss of character which will occur in seeking to introduce 845 dwellings into the rural environment of Ōhoka which are contrary to the following sections of the Waimakiriri District Plan:

Objective 14.1.1: 'Avoid subdivision and/or dwelling house development that results in any loss of rural character or is likely to constrain lawfully established farming activities'.

Policy 14.1.1.2: 'Maintain the continued domination of the Rural Zone by intensive and extensive agricultural, pastoral and horticultural land use activities'.

Policy 14.1.1.3: 'Maintain and enhance the environmental qualities such as natural features, air and noise levels, including limited signage and rural retail activities that contribute to the distinctive character of the Rural Zones, consistent with a rural working environment'.

Policy 18.1.1.9 of the operative WDP to 'maintain a rural village character comprising of low density living environment'.

20. The amendments which Mr Milne highlights will provide a high level of amenity and will also help to visually screen the development, however if granted the result will be a densely populated island with no rural character located in the mid Canterbury rural landscape.

Conclusion

21. The proposal has been constructed by an experienced team and the application includes a range of landscape design approaches that are positive and would provide amenity.
22. However, this is a high density suburban proposal that does not suit this rural area. The proposed amenity enhancements and rural features as proposed by PC31 – e.g. screen planting, perimeter landscape treatments, rural style entrances, permeable fence types, and streets without kerbs and channels - are insufficient to protect the rural character of the Ōhoka settlement.
23. I support my original assessment of the Plan Change and consider that the proposal will have an adverse effect on the character of Ohoka in the *moderate - high* range. If granted in its current form, the outcome of PC31 will be that the present character of the Ōhoka village will no

longer exist and will be replaced with a suburb of housing density that is normally found in urban centres such as Christchurch or Rangiora.

Date: 21 July 2023

Kim Thomas Goodfellow

LANDSCAPE AND VISUAL IMPACT ASSESSMENT – PEER REVIEW

WDC PC31 – ROLLESTON INDUSTRIAL DEVELOPMENTS LTD – 535 MILL ROAD, OHOKA.

PROPOSED PLAN CHANGE FOR RESIDENTIAL DEVELOPMENT IN OHOKA.

Kim Goodfellow - Registered Landscape Architect NZILA

The Goodfellow Group Ltd

23rd July 2022

INTRODUCTION

Rolleston Industrial Developments Ltd ('RIDL') have requested a Private Plan Change in relation to the Waimakiriri District Plan (WDP). The proposed Plan Change (PC31) seeks to provide a greater area and type of residential development in Ohoka. The proposal, covering an approximate area of 156ha, is currently zoned Rural under the WDP. The proposal seeks to establish an Outline Development Plan (ODP) for the area and will include:

- Residential Zone 3 (up to 700 new households),
- Residential Zone 4a (150 new households)
- Residential 8 (possible School or Retirement home or residential activities), and
- Business Zone 4

This RIDL proposal includes approximately 850+ new households. The Plan Change and ODP adopt three current zones from the District Plan, being Residential 3 & 4A and Business 4 with a proposed amendment to the Residential 4A Zone (in respect of the plan change site only) increasing the average density from a minimum 5,000m² per allotment to a maximum of 3,300m².

Appendix E of the PC31 request is a Landscape and Visual Impact Assessment dated 21st February 2021, prepared by DCM Urban Design (the DCM report) comprising of:

- Introduction,
- Methodology and definitions
- Assessment of Effects
- Mitigation Measures
- Conclusions
- Appendix One – Landscape and Visual Impact Assessment Figures

The DCM report and separate Plan Change document prepared by Novo Group (June 2022, prepared by Tim Walsh) has been reviewed.

The authorship of the DCM written report is presented as 'Dave Compton-Moen/Sophie Beaumont'. This is a departure from the norm of having a single author which is considered preferable so that future discussions can more reasonably occur with a single person.

This report is a peer review of the DCM material only. This peer review was prepared during July 2022 and included a site visit to the Ohoka area on 16th July 2022. The Ohoka area is a vicinity which the author is familiar with in general and has visited it on previous occasions.

The full findings of the DCM assessment are not set out in this report. This report gives review comments on the DCM report, discusses its methodology, findings and conclusions. For the sake of conciseness, this report does not repeat the aspects of the DCM report that are agreed with. More explanation is given in relation to where information is missing, matters that would benefit from further clarification or areas where there is disagreement.

In accordance with *Aotearoa Landscape Assessment Guidelines (final version April 2021)* this peer review is structured under the following sub headings;

- Purpose, methodology and definitions
- Existing landscape
- Proposal
- Statutory planning provisions
- Design response
- Conclusions
- Overall Conclusions of the Peer Review

PURPOSE, METHODOLOGY AND DEFINITIONS

It is conventional for the presentation of landscape and visual assessments to be supported by visual simulations which is a useful tool to illustrate the points which have been identified and elaborated within the written report and to support any findings and conclusions. No visual simulations were included with the DCM report which is considered to be an omission within the assessment. Simulations are considered pertinent given the proposal to provide a residential development of considerable scale (156ha) and density into a historic rural settlement, and such visual material is requested to better furnish the written assessment and illustrate in sufficient detail the proposed development, and potentially help support the findings contained in the written assessment.

The methodology uses the 7-point scale as recommended in the *Aotearoa Landscape Assessment Guidelines* which is considered appropriate. However it is not clear what value is achieved by also including an alternative 6-point system from the Quality Planning website. This alternative system is considered unnecessary and confusing rather than benefit the landscape assessment.

EXISTING LANDSCAPE

The DCM report describes the existing site in a number of ways which requires further consideration. The opening paragraph suggests that the receiving environment for the project encompasses the entire area from the Southern Alps to the Port Hills. This is considered an overstatement which bears little relevance to the scope of the landscape assessment for the proposed development in Ohoka.

The descriptions include references to areas which have a higher suburban density including Kaiapoi township: *'...It is approximately 4.5km to the west of Kaiapoi where development has a typical medium density suburban character, and 2km northeast to Mandeville Village where development has a typical rural suburban character and density'*. Drawing such comparisons is considered irrelevant to the rural character of Ohoka.

The DCM report describes the existing site character with regard to topographical and physical character, waterways and vegetation patterns in sufficient detail. However no attention is given to present the sensory or perceptual qualities or character of Ohoka as a very small historic settlement (which is distinct to many other rural settlements in Canterbury) which are considered important attributes and qualities of the existing landscape character. Instead the DCM report describes the site character in generic terms such as *'...typical rural residential character...'*, and *'...the land surrounding the proposed site mirrors the overall character of the wider Canterbury region'*. This is considered to be an overly simplistic and inadequate interpretation of the landscape character of the Ohoka settlement.

The sensory/perceptual qualities, historic character and very small size of the settlement (e.g. the Ohoka Service Station is the only retail outlet in Ohoka) are considered pertinent to the landscape assessment given that approximately 850+ households are proposed to be inserted into this very small rural settlement setting. The description of the existing landscape is considered insufficient and additional assessment is required that more comprehensively identifies the character, attributes and amenity of Ohoka, and which will provide a more accurate basis for the landscape assessment.

PROPOSAL

The size and scale of the proposed development is an important consideration to be assessed in terms of the potential landscape and visual effects. This includes the physical extent of the development as depicted on the ODP. For example the DCM report does not explain why the proposed area of residential development does not stop at the locations of the natural waterways since these waterways might be interpreted as a suitable extent (i.e. limit) of development within the natural and rural landscape. Such issues are considered pertinent to the landscape assessment with regard to integrating the new development into its surroundings. Further explanation of this issue is suggested to better understand the scale and size of the development.

As mentioned above, inclusions of visual simulations are requested to communicate the proposal (and its potential landscape effects) in a clearer manner. Similarly, the proposal is not supported by a plan which illustrates the lot arrangement within the proposed site, which would be a useful landscape assessment tool in relation to the surrounding property sizes within the receiving environment of Ohoka. Without further detail provided on this matter within the DCM report, the reviewer anticipates the housing density of the proposal will be significantly higher than the surrounding density and possibly quite possibly out of character with the settlement of Ohoka.

STATUTORY PLANNING PROVISIONS

Section 2.7 of the DCM report specifically refers to Section 6 of the RMA and landscapes of **outstanding nature features, areas of significant indigenous vegetation and significant habitats of indigenous fauna**, however none of these resource types are found within the project site or relevant to the landscape and visual assessment.

Section 3.3 of the DCM assessment (Effects on Landscape Values) does not give any consideration to the relevant provisions of Section 7(f), and 7(c) of the RMA which relate to matters in respect to **‘quality of the environment’** and **‘amenity values’**. Such matters are considered important to the assessment when considering the attributes and amenity of the Ohoka settlement and therefore additional assessment is recommended. However the DCM report only mentions Section 7(c) in a superficial manner. Additional assessment in this regard is recommended.

The following documents describe the overall vision for strategic growth in the Canterbury Region and Waimakiriri District:

- Waimakiriri Rural Residential Development Strategy (2019)
- Our Space – Christchurch Settlement Pattern Update 2018-2048 (2019)
- Our District, Our Future (2018)

These documents are considered important since they have a statutory background formed under the Local Government Act and are persuasive and have been consulted on.

‘Our District, Our Future’ seeks to limit future growth in small settlements including Sefton, Ashley, Cust, Tuahiwi and Ohoka, stating:

‘...Community feedback sought to limit further growth in these settlements to protect their unique character and avoid natural hazard impacts for beach settlements. These comments reflect policies within the operative District Plan that seek to maintain the compact form of the settlements’ (underline added).

Similarly, in the interest of maintaining rural character, the ‘Waimakiriri Rural Residential Development Strategy’ plans to limit development in small settlements which includes Ohoka, and instead confirms Swannanoa, Oxford, Ashley/Loburn and Gressons Road as the areas which are planned for growth within the Waimakiriri District.

The Applicants proposal to provide for 850+ new households to the settlement of Ohoka appears to be in conflict with the strategic vision contained in these documents to control or limit rural residential development in Ohoka. However the discussion within the DCM report does not mention or respond to this Regional and District-wide development strategy. Further assessment in regard to landscape character and, in particular rural character, is considered relevant to this statutory framework to help underpin the the landscape assessment and its findings.

LANDSCAPE AND VISUAL EFFECTS

Effects on Landscape Character

The introductory section of the DCM report appropriately defines landscape character as the “.. *combination and composition of biophysical elements such as topography, vegetation, built form and sensory qualities perceived by humans. Landscape character is also spiritual, cultural, and social associations*”.

It is considered that the sensory, cultural or social characteristics of the Ohoka settlement includes specific attributes such as its very small settlement size, historic aesthetic, rustic and quiet atmosphere, minimal services. Also to be included are the attributes that make up the central core or ‘heart’ of the settlement in the general vicinity of the the Ohoka Service Station, Ohoka Domain and Ohoka Hall.

The central area of Ohoka is focused on Mill Road which exhibits a very rural character. This area will be irrevocably changed as a result of the proposal which will transform a 600m long section of Mill

Road with residential development, however the DCM report does not identify or discuss the potential landscape and visual effects on the landscape character of this core zone of Ohoka.

These attributes form an important part of the landscape character of Ohoka, however the DCM report does not acknowledge such attributes and character or address any potential issues which might arise on this character as a consequence of the additional 800 new households and associated infrastructure of the overall development. It is considered that the discussion on landscape effects should be expanded to acknowledge this character further and confirm if the nature and magnitude of effects on the specific landscape character of Ohoka remains consistent with Table 2 of the DCM report.

The DCM report also states: *“Overall, the character and land use of the area will shift from semi-open and agriculturally focused to a more compartmentalised character, high amenity urban development. Through several mitigation measures, the village-like urban character will be retained and enhanced, where possible”*.

Given the sensory attributes and character of Ohoka as described above, further discussion is required within the DCM report which explains how potentially adverse landscape effects on this existing rural character can be addressed following a change to the rural fabric and small scale character of the Ohoka settlement.

The section on Effects on Landscape Character does not conclude with a determination of the level of effects (e.g. very low, low, moderate etc). Further assessment is warranted.

Effects on Landscape Values

The following section considers the various Objectives and Policies of the District Plan;

With regard to **Objective 14.1.1**, the DCM report states, *‘The proposed plan change... will help retention of the open and spacious rural character’*. This determination is not considered plausible given the size and scale of the proposed new development within Ohoka and the likely effect on the existing rural character, spaciousness etc.

A concluding statement within the DCM report is *‘Aspects of rural character are to be maintained on the proposed Plan Change site and through design and mitigation measures along the boundaries adjoining land will not be adversely effected by the proposal’*. This statement is not supported with any further discussion to explain more specifically what aspects of rural character would be maintained. It does not seem plausible that no adverse effects at all will result.

With regard to **Policy 14.1.1** the DCM report has a focus on the boundary treatments of the proposal, however it is considered a deeper assessment of the effects on rural character is warranted in providing 850+ new households in Ohoka.

With regard to **Policy 14.1.2** the DCM report explains *‘While the receiving environment is zoned Rural, there has been a significant shift from high amenity productive land to one that has a higher density of dwellings’*. The described ‘shift to a higher density of dwellings’ is also not in accordance with this policy to **maintain the continued dominance of the Rural Zone by extensive and intensive agricultural, pastoral and horticultural land use activities**. Further assessment is suggested.

Effects on Visual Amenity

The missing visual simulations, mentioned earlier in this review, is considered of particular importance to help interpret and represent the visual effects section of the landscape assessment.

The section on *Effects on nearby residents* (page 16 of the DCM report) states: *'The bulk and density of the proposal is consistent with the character of the adjacent urban environment'*. It is not agreed that Ohoka settlement can be reasonably defined as an urban environment so further discussion would be helpful to better understand the meaning of this statement, and given that the earlier section of the DCM report (page 8 Existing Site Character) describes Ohoka in terms of its rural character, not urban.

This review disagrees with a number of findings contained within *'Table 2: Assessment of Effects on Visually Sensitive Receptors'* of the DCM report:

- 'Sensitivity of VSR': a number of visually sensitive viewpoints are located zero metres from the Proposal. Given the size and scale of the residential development it is expected that such viewpoints would more consistently attract a High level of 'Sensitivity of VSR', however the DCM report gives findings of only Low or Very Low.
- 'Magnitude of Change': it is considered that these findings would be closer to a High, as opposed to the Low or Very Low findings.
- 'Effects after mitigation': All findings are Minor or Less than Minor, when it is considered that Moderate to High levels of adverse effects are more likely.

CONCLUSIONS

The DCM report concludes that the landscape effects of the proposed residential development on Ohoka will be low.

OVERALL CONCLUSIONS OF THE PEER REVIEW

This review has highlighted significant issues that have been overlooked or missing within the DCM report. Additional assessment is recommended which should include visual simulations to better furnish the assessment.

It is also considered that the findings of the DCM report understate the likely landscape and visual effects of the proposal. It is considered that the proposal of 850+ new households in the rural environment of Ohoka will likely have an adverse effect on the landscape character in the Moderate to High range. Photographs taken during the site visits are inserted below which portray the existing rural landscape character of Ohoka.

Photo 1 below: view looking westward up Mill Road which is the central area/main street of the Ohoka settlement, showing a predominant rural landscape character.



Photos 2 and 3 below: views looking northwest from Whites Road across the proposed site, showing the rural landscape character, agricultural landuse pattern and expansive views.

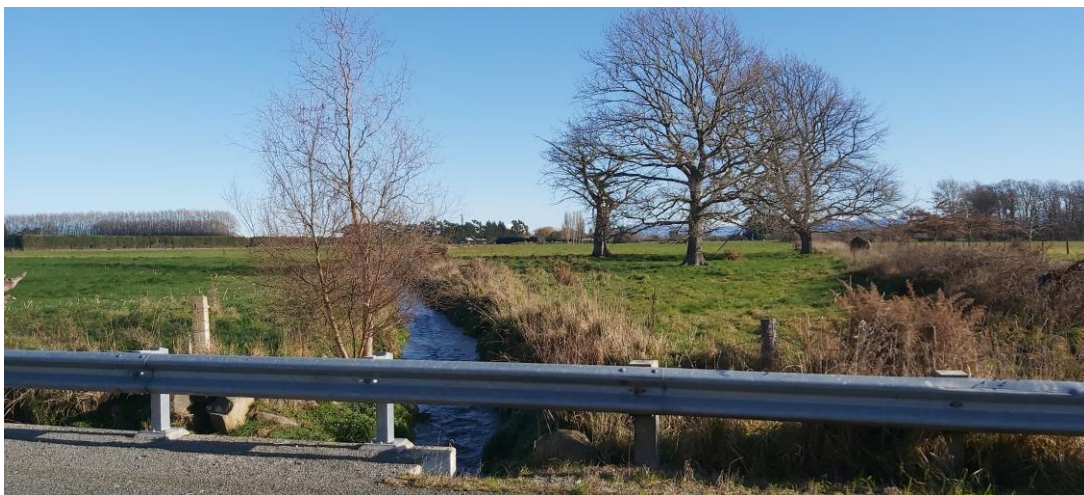


Photo 4 below: views looking northeast from Bradleys Road across the proposed site, showing the rural landscape character, agricultural landuse pattern and expansive views.



Kim Goodfellow

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23rd July 2022