

BEFORE THE INDEPENDENT HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991 (**"the Act"**)

AND

IN THE MATTER of Private Plan Change 5 (**"PPC5"**) -100 and
110 Te Moana Road, Waikanae

**STATEMENT OF EVIDENCE OF SIMON LEIGH BUTTON ON BEHALF OF THE KĀPITI
COAST DISTRICT COUNCIL**

LANDSCAPE

2 July 2026

1. INTRODUCTION

Qualifications and Experience

- 1.1** My full name is Simon Leigh Button. I hold a BA qualification in landscape architecture with town and regional planning and a Masters' qualification in landscape architecture obtained from the University of Sheffield (United Kingdom). I am a registered member of the New Zealand Institute of Landscape Architects NZILA Tuia Pito Ora and an elected member of the board, where I currently hold the position of Vice President.
- 1.2** I am an Associate Landscape Architect at Isthmus Group Limited (**IGL**) with 14 years' experience. I have worked at IGL since March 2019 and prior to this I was a landscape architect in the United Kingdom.
- 1.3** Throughout my career I have worked with both private and public sector clients on a wide range of projects in both urban and rural landscapes across the United Kingdom and New Zealand. I regularly undertake landscape, visual and natural character assessments, and peer reviews, for projects of varying scales in the residential, industrial, commercial, renewable energy, recreational and infrastructure sectors. Of particular relevance, I have authored landscape assessments to support plan changes, including changes from rural to residential zoning; and have prepared landscape assessments to support resource consents for proposed subdivisions across both the north and south islands.

Involvement In Project

- 1.4** IGL undertook a high-level review of the draft Landscape & Visual Effects Assessment (Wayfinder, 25 February 2025) supporting PPC5 in June 2025, providing an initial landscape memorandum and Section 92 request for additional information to Council. I was not involved in the high-level review and became involved in the project at the instruction of Council in June 2026.
- 1.5** I undertook a site visit on 1st July 2026 to gain an appreciation of the site and the surrounding landscape context.

Code of Conduct

- 1.6** I confirm that I have read the Code of Conduct for Expert Witnesses¹ in the Environment Court Practice Note 2023 and that I agree to comply with it. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the Hearings Panel. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

2. PURPOSE AND SCOPE OF EVIDENCE

- 2.1** My evidence provides an expert review of the Landscape & Visual Effects Assessment (Wayfinder, 25 February 2025), prepared by Ms. McBain, which accompanies PPC5. In preparing my evidence, I have reviewed the following:

- Landscape and Visual Effects Assessment (Wayfinder, 25 February 2025) (**the Assessment**)
- Request for Further Information Response (Wayfinder, 24 June 2025) (**RFI Response**)
- Proposed Changes to the General Residential Zone Chapter
- Proposed Changes to the Urban Form and Development Chapter
- Concept plans which support PPC5 (Wayfinder, November 2024)
- Submissions (3.no) where relevant to landscape matters.

3. REVIEW FINDINGS

Assessment Methodology

- 3.1** The assessment methodology provided within the Assessment is consistent with Te Tangi a Te Manu and is appropriate, considering the matters relevant to the context and Plan Change nature and extent. The methodology (specific to the consideration of natural character effects) is expanded on within the RFI Response, with natural character being appropriately defined, assessed, and distinguished from landscape effects.

¹ <https://environmentcourt.govt.nz/assets/Practice-Note-2023-.pdf>

Potential Effects on the Natural Character of the Coastal Environment

- 3.2** The natural character values (abiotic, biotic and perceptual / experiential) of the site and its localised setting are well described within the RFI Response.
- 3.3** I agree that the site is modified, and overall exhibits **low** natural character values (on a 7 point scale). In my opinion, the coastal environment natural character values of the site, whilst modified and diminished, primarily relate to the dune landform in the southern part of the lot (Refer Appendix A) and the interdune wetland in the north western part of the lot. These unmodified dune landforms (rising to circa 15m in height) contribute to the wider pattern of dunes either side of the Waikanae River flood plain (some of which include residential development and roading infrastructure, however with the dunes generally remaining legible), and to the coastal landscape of the district.
- 3.4** When considering the combination of biotic, abiotic and perceptual / experiential effects, alongside the feasible application of the Medium Density Residential Standards (MDRS) within the site, I agree that, overall, adverse effects on the natural character of the coastal environment from rezoning the site to General Residential Zone would be **Low Moderate**.
- 3.5** As I understand, should the site be re-zoned to General Residential Zone, any residential development that does not comply with the permitted earthworks rules and standards would be a restricted discretionary activity under Rule EW-R5 and would require resource consent. The relevant earthworks standards to the site include a maximum disturbance of 50m³ of land per subject site in residential zones, and a restriction of the alteration to the original ground level by more than 1m (measured vertically)². Should these standards not be met, any subsequent resource consent application would be required to give consideration to Objective DO-04 which restricts the further loss of coastal dunes within the coastal environment, and Policy EW-P1 which requires earthworks to be managed to ensure adverse effects on natural landforms, residential amenity values and rural character values are remedied or mitigated.
- 3.6** In my opinion, when considering the permitted earthworks standards and the required considerations of any resource consent should those standards not be met, there is adequate protection of the sand dune in the southern part of the

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With the dunes being approximately 15m – 20m in height

lot to a degree which ensures that its overall legibility is maintained and that the natural character values are not unduly affected.

3.7 The existing wetland areas of the site will be retained within a QEII covenant and protected within the lot, also noting that Rule EW-R2 of the District Plan contains a permitted activity standard that 'earthworks must not be undertaken within 20m of a waterbody, including wetlands'.

3.8 The plan change will provide for residential development, including the potential for medium density type housing on the site, with the indicative roading layout shown in the application documents. In my view, considering both the permitted earthworks, development provisions and the sites context, future housing will be able to be integrated such that there are no more than low moderate adverse natural character effects.

Potential Effects on Landscape Values

3.9 In my opinion, adverse effects on landscape values (as separate from natural character effects) can be considered in terms of the urban system and attributes contributing to landscape values, within the sites more immediate setting/context. I agree that a change in zoning from rural to residential will fit well into the wider urban patterns and setting of the site, which includes existing surrounding residential development, the State Highway 1 (SH1) corridor to the east and supporting residential infrastructure and amenities.

3.10 Overall, I agree that the rezoning of the site will result in **Low** adverse effects on existing landscape values noting the retention of mature Pohutukawa planting along the site frontage.

Potential Visual Amenity Effects

3.11 I broadly agree with the Assessment which finds that overall, PPC5 will result in **Low** adverse visual amenity effects. However, I disagree with the potential level of effect identified for those immediately adjacent / neighbouring properties along the site's western boundary, which in my opinion will experience a greater effect than the effect from other viewpoints in the broader context.

- 3.12** In my opinion, due to the openness of the outlook of some residences along the western site boundary (notably 4, 6, 8 and 10 Fairway Oaks Drive - which are at a comparable elevation to the site), the proposed zone change will enable a change in outlook which would be of a **Moderate** magnitude. While views of new dwellings will not be inappropriate, given that the wider context is residential and that the site itself is not inherently rural in character, the scale of development as permitted under the MDRS will allow for up to 11m high residential development which is 1m from the shared boundary. In my opinion, this will be a notable departure from the visual amenity values anticipated by the current zoning of the site (which enables 1 dwelling, 8m in height with a 5m setback from the boundary and a 2.1m high 45 degree height in relation to boundary plane).
- 3.13** The General Residential Zone includes provisions and rules which require development to include landscape treatments to enhance residential amenity and reduce the visual impact of large buildings (notably at GRZ-P10, GRZ-P12 and GRZ-R33 of the General Residential Zone Chapter of the District Plan). However, in my opinion, these provisions would not address the potential effect of the change in zone, rather they would seek to manage effects when considering the baseline of the General Residential Zone.
- 3.14** In my opinion, there is potential for adverse visual amenity effects resulting from the change in zone on neighbours which will need to be mitigated through design.
- 3.15** I acknowledge that the District Plan can not be more restrictive than the MDRS as a permitted standard unless relating to a qualifying matter (which, from a landscape perspective is not relevant to PPC5); however in my opinion, a setback in some form (to include native shrub and tree planting) along the north western boundary is required to appropriately manage effects. In my opinion, the below mechanisms are appropriate and would assist in ensuring that development is successfully integrated into the environment.
- The inclusion of a specific matter of discretion that applies to the site to require the assessment of visual effects through the consent process (required for the development of more than 3 units).
 - The provision of a Landscape Framework Plan

- Embedding a Structure Plan for the site into the District Plan, which could also address any other constraining factors relating to other disciplines (if required)

3.16 Should a development setback (to include native shrub and tree planting) along the north western boundary be implemented through one of the above mechanisms, then in my opinion, effects would be appropriately managed. In my opinion, the below setback distances would be appropriate to manage effects (as illustrated in Appendix A):

- Should development along the north western site boundary be up to 8m in height (the height enabled by the General Rural Zone), then a 5m development setback is to be applied along the boundary. The setback is to include native shrub and tree planting, the purpose of which is to filter views of development from 4, 6, 8 and 10 Fairway Oaks Drive, and to integrate the development into the receiving environment.
- Should development along the north western site boundary be upwards of 8m in height (with 11m high development enabled by the General residential Zone), then a 10m development setback is to be applied along the boundary. The setback is to include native shrub and tree planting, the purpose of which is to filter views of development from 4, 6, 8 and 10 Fairway Oaks Drive, and to integrate the development into the receiving environment.

3.17 Overall, while I disagree with the Assessment that effects for immediate neighbours will be no more than Low adverse, given the MDRS (and the permitted baseline of effects resulting) will apply across the General Residential Zone. The proposed Plan Change will enable a change in outlook to the east which will be Moderate adverse for a small number of properties, however, there is potential to manage these effects through the application of planning mechanisms.

Urban Design and Development Outcomes

3.18 In my opinion, PPC5 includes sufficient strategic direction to achieve urban design and development outcomes, with the exclusion of managing the effects on visual amenity values anticipated by the current zoning of the site in views from 4, 6, 8 and 10 Fairway Oaks Drive.

- 3.19** I am supportive of the retention of the QEII Covenant Area within the site and protection of the mature Pohutukawa trees along the frontage of Te Moana Road.
- 3.20** In my opinion, the proposed alignment of the internal spine road is generally sympathetic to the underlying landform and topography of the site, with the central road following the contour of the sand dune and the southern spur of the road extending across a localised saddle in the dune. Furthermore, the placement of the proposed north-east to south-west cul-de-sac in the northern part of the site is adequately spaced to ensure that development can front Te Moana Road, ensuring that good overall urban design outcomes can be achieved.
- 3.21** Overall, I am satisfied that the urban design and development outcomes (specific to subdivision design and residential amenity) can be addressed during any future resource consent process, should an appropriate planning mechanism be applied to address potential visual amenity effects from 4, 6, 8 and 10 Fairway Oaks Drive.

Reliance on Future Design and Mitigation, and Integration with the Planning Framework

- 3.22** In my opinion, the overall potential landscape effects arising from PPC5 can be appropriately managed by the current General Residential Zone District Plan provisions; however the inclusion of a planted development setback along the north western site boundary would be most appropriately addressed through one of the planning mechanisms listed at paragraph 3.15 of this evidence to ensure that the visual amenity values from 4, 6, 8 and 10 Fairway Oaks Drive anticipated by the current zoning of the site are appropriately mitigated.
- 3.23** In my opinion, should one of these approaches be adopted, then the consent processes are sufficient to provide effective safeguards to manage any potential adverse landscape effects arising from residential development within the site.

4. RESPONSE TO SUBMISSIONS

- 4.1** Landscape related matters raised in submissions are limited to the submission by the Fairway Oaks Drive Residents' Partnership. Rural Amenity and Character concerns are raised under Matter 5 of the submission and are outlined on page 8. The submission raises concern in relation to:
- The loss of a distinctive rural character within the Te Moana landscape.
 - The irreversible effects of urbanisation which will diminish the sense of place.
- 4.2** In my opinion, the rural character values of the site are Low. Whilst providing for a degree of rural amenity, notably due to the undeveloped outlooks (to the degree anticipated by the General Rural Zone) in some properties from Fairway Oaks Drive, the site itself is set within a broader residential context and adjacent to SH1, displaying peri-urban characteristics. I agree that PPC5 will result in a notable departure from the visual amenity values anticipated by the current zoning of the site to a Moderate degree; however, in my opinion this can be mitigated through appropriate design controls at the resource consent stage.
- 4.3** Whilst I agree that the Te Moana landscape (assumed to refer to the eastern settlement edge of Waikanae Beach) does have a distinctive character, in my opinion this is primarily informed by the undulating sand dunes; some of which already include residential development. In my opinion, PPC5 will not detract from the legibility of the dunes (noting the permitted earthworks standards in the District Plan) and the indigenous vegetation values (as wetland and surrounding areas of indigenous vegetation are retained within a QEII area) of the site will be protected.
- 4.4** The proposed Plan Change will result in a change from rural land-uses to a residential development within the site, however the plan change makes no provision to increase the density beyond that anticipated by the General Residential Zone, which is also applied to the wider residential area in Waikanae Beach (including Fairway Oaks Drive). In my opinion, PPC5 will not detract from a sense of place, beyond a departure from the visual amenity values anticipated by the current zoning of the site as experienced by 4, 6, 8 and 10 Fairway Oaks Drive.

5. CONCLUSIONS AND RECOMMENDATIONS

- 5.1** In my opinion, PPC5 will result in overall low adverse effects on landscape values including to characteristics that contribute to visual amenity, and low-moderate adverse effects on the natural character of the coastal environment. This assessment reflects the modified nature of the site and its location within an established urban context.
- 5.2** While I broadly support the findings of the Assessment, I consider that moderate adverse visual amenity effects may arise for a small number of properties along the north-western boundary, due to a departure from the visual amenity values anticipated by the current zoning of the site when considering the introduction of MDRS enabled development.
- 5.3** In my opinion, these effects are localised and can be effectively managed through the application of planning mechanisms to provide a planted setback (between 5 - 10 metres in width depending on the scale of proposed development) along the north-western boundary.
- 5.4** Subject to the incorporation of appropriate landscape mitigation measures, I am satisfied that the potential landscape and visual effects of PPC5 can be appropriately managed within the planning framework, and that the proposal is appropriate in landscape terms.

A handwritten signature in black ink, appearing to read 'Simon Button', with a stylized flourish at the end.

Simon Button

18 August 2026



Appendix A: Recommended setbacks, potential affected adjacent properties and approximate extent of dune landform