

**BEFORE THE INDEPENDENT PANEL
OF KAPITI COAST DISTRICT COUNCIL**

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

AND

IN THE MATTER of Private Plan Change 4 ("PC4") to the Kāpiti Coast District Plan ("Plan") - 65 and 73 Ratanui Road, Otaihanga

**STATEMENT OF EVIDENCE OF ALEXANDRA KATHERINE GARDINER ON
BEHALF OF WELHOM DEVELOPMENTS LIMITED**

LANDSCAPE AND VISUAL

16 JANUARY 2026

**Russell
McLeagh**

D J Minhinnick / E M E Boister
P +64 9 367 8000
F +64 9 367 8163
PO Box 8
DX CX10085
Auckland

1. INTRODUCTION

1.1 My full name is Alexandra Katherine Gardiner. I am an Associate Principal Landscape Architect at Boffa Miskell Limited, a national firm of consulting planners, ecologists and landscape architects.

Qualifications and experience

1.2 I am a registered member (NZ, 2023) of the New Zealand Institute of Landscape Architects (NZILA) as well as a chartered member (CMLI) of the British Landscape Institute (Edinburgh, 2016). I hold a Bachelor of Design (2007) in Landscape Architecture from Victoria University of Wellington, as well as a Master of Resource and Environmental Planning from Massey University (2010).

1.3 I have worked on a wide variety of projects throughout my 18 years in professional practice. I have worked on numerous projects dealing specifically with rural and urban amenity matters (including outlook and visual effects) throughout New Zealand and in the United Kingdom, including solar, wind and battery storage projects, geothermal power station developments, wastewater treatment plants, reservoirs, subdivisions, plan change requests, and retirement villages.

1.4 I have also reviewed numerous landscape assessments on behalf of district councils across New Zealand, providing technical advice and feedback on assessments for a range of development types including wind farms, solar farms and medium density residential development. I am therefore qualified to provide landscape and visual evidence for this project.

Involvement in Welhom Developments Limited plan change request

1.5 My involvement on this private plan change request to Kāpiti Coast District Council ("KCDC") by Welhom Developments Limited was to undertake a technical evaluation of visual amenity and landscape effects in relation to the application to rezone the site at 65 and 73 Ratanui Road ("Plan Change Area") for residential development, including the provision to construct and operate a comprehensive care retirement village. The Landscape and Visual Effects Assessment (along with supporting Graphic Supplement) was prepared by

myself.¹ A copy is included with the Assessment of Environmental Effects as part of the Plan Change Request.

1.6 The Plan Change relates to an approximately 12.65ha tract of land located on the eastern edge of Paraparaumu. A Structure Plan was prepared as part of the Plan Change request which illustrates what the development of the Site could look like. I have visited the Site and surrounding area. I have been engaged on an ongoing basis to provide expert technical advice regarding landscape and visual concerns relating to the application.

Code of Conduct

1.7 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 will continue to comply with it while giving oral evidence before the Hearing Commissioners. 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.

2. SUMMARY OF EVIDENCE

2.1 PC4 proposes the rezoning of approximately 12.65ha of land at 65 and 73 Ratanui Road, Otaihanga, from Rural Lifestyle Zone ("RLZ") to General Residential Zone ("GRZ"), with provision for a retirement village. The Plan Change Area is located on the eastern edge of Paraparaumu and currently acts as a transitional area between established urban development and the smaller settlement of Otaihanga.

2.2 The Plan Change Area is currently rural in appearance, comprising modified undulating dune landforms, open grassed paddocks, and scattered mature vegetation. Current zoning provides for subdivision of 12 lots across the Plan Change Area (1ha in size) as a restricted discretionary activity. Once subdivided, 12 dwellings and 12 minor residential units could be established on the Site. The proposed PC4 will allow for a change in the current landscape character, shifting from a low density rural-residential setting to a medium density residential environment. In undertaking the landscape and visual assessment, I have considered the effects on landscape character, visual amenity, and natural character.

¹

Boffa Miskell 2024. Private Plan Change: Landscape Effects Assessment for Private Plan Change Request to the Kāpiti Coast District Plan. Report prepared by Boffa Miskell Limited for Welhom Developments Limited.

2.3 In my view, the proposed rezoning is appropriate in this location. The Plan Change Area is adjacent to existing residential development and is identified in KCDC's Growth Strategy - Te Tupu Pai as a medium-priority greenfield growth area.² From a landscape and visual perspective, the development can be assimilated into the existing landscape context, provided that the recommended mitigation and design control measures are implemented. These are set out in Paragraph 5.2 of my evidence.

2.4 The Plan Change Area is not identified by KCDC as an Outstanding Natural Feature or Landscape ("ONFL") or a Significant Amenity Landscape ("SAL"). It is located within the Coastal Environment but has low to very low levels of natural character, due to existing land use modifications. Effects from PC4 on the natural character of the Plan Change Area will be **very low**.

2.5 My assessment concludes that PC4 will result in a change in landscape character, resulting in an adverse **low-moderate** effect. At the local scale, it would reduce the area of rural appearing (ie undeveloped RLZ) landscape between Paraparaumu and Otaihanga. At the district scale it would represent a logical change in land use by consolidating urban development within an existing envelope of development, rather than extending the town's edges further. Over time, the implementation and establishment of appropriate measures, including building setbacks, landscaping, street trees, boundary planting and restoration of wetland areas, will assist the development to integrate into its landscape setting and effects will reduce to **very low**. The proposed development is considered a logical tract of land in which to densify urban development into the existing urban area and which can be appropriately integrated into the surrounding context through sensitive design and mitigation.

2.6 As a consequence of the Plan Change Area's location and the limited visibility, adverse visual effects from public spaces are considered to be **low** or **very low**. The anticipated effects on neighbouring properties range from **neutral** to **low-moderate** adverse, depending on proximity and visibility.

2.7 These effects can be appropriately managed through the delivery of landscape buffers, sensitive earthworks, and planting plans. I support the inclusion of design controls to ensure that future development is integrated into the surrounding environment and that visual and amenity effects are mitigated.

²

The evidence of Mr Torrey McDonnell (Planner) provides further contextual information with regard to previous rezoning discussions in the Otaihanga area during Plan Change 2.

3. SCOPE OF EVIDENCE

3.1 This statement of evidence will:

- (a) provide a brief summary of the landscape and visual context of the proposed plan change;
- (b) summarise the key findings and recommendations from the Landscape and Visual Effects Assessment ("LVEA");
- (c) respond to the Council Officer's report; and
- (d) respond to the submissions received.

4. CONTEXT

4.1 The Plan Change Area is located on the eastern edge of the Paraparaumu conurbation and acts as an area of transition between this large urban area and the smaller settlement of Otaihanga (see **Image 1**, below and **Figure 1** in Appendix 2: Graphic Supplement of the LVEA). The Plan Change Area is located within the Coastal Environment, as defined by the District Plan. There are no other landscape related overlays associated with the Plan Change Area.



Image 1: Plan Change Area location on the eastern edge of Paraparaumu's urban area.

4.2 The 12.65ha Plan Change Area is somewhat rectangular, bordered to the north by paddocks, to the south by Ratanui Road and the boundaries of three rural residential properties, to the east by lifestyle farmland associated with

rural residential properties, and to the west by a mix of rural residential and residential properties which form the eastern edge of Paraparaumu.

4.3 The Plan Change Area is zoned Rural Lifestyle. The north western extent of the Plan Change Area adjoins the General Residential zone which extends across the built-up area of Paraparaumu (see **Image 2**, below and **Figure 2** within the Graphic Supplement that supported the Landscape Assessment).

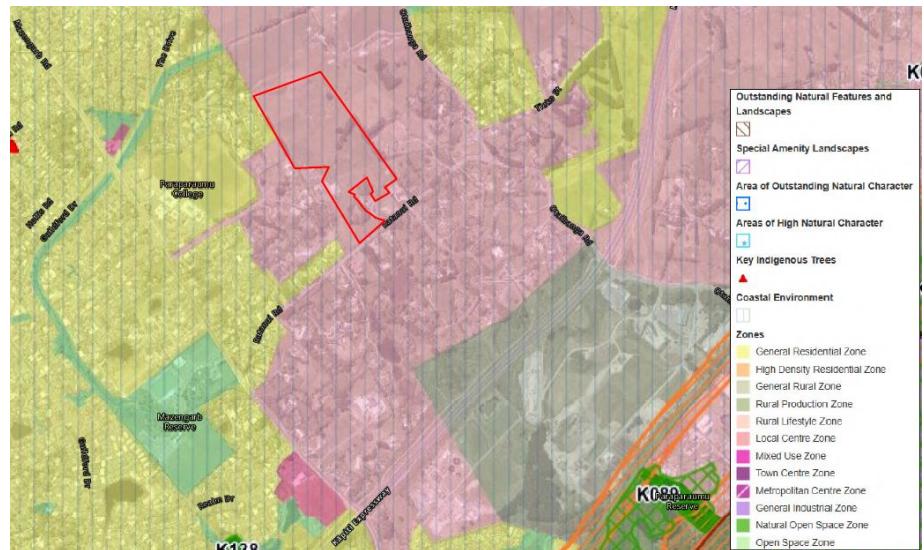


Image 2: Excerpt from the KCDC Online Planning Map amended to show the Plan Change Area in red.

4.4 The Plan Change Area comprises undulating topography reflective of the dunelands which characterise the Kāpiti coast landscape (see **Figure 5: Photographs A, B and C** within the Graphic Supplement that supported the Landscape Assessment). It is rural in appearance, comprising small fields used for grazing and individual trees or tree groups / belts scattered across the Plan Change Area and its boundaries. Paddocks are delineated by posts and wire fencing. Generally, the Plan Change Area is free of structures with the exception of one farm building located in the southwestern extent of the Plan Change Area, and farm related elements such as fencing and troughs etc. Current access to the Plan Change Area is from the south via Ratanui Road.

4.5 A channelised stream passes through the central part of the Plan Change Area in a roughly east-west direction. Small areas of wetland and associated wetland vegetation are present throughout the Plan Change Area, and a large manmade pond is located within the Plan Change Area's southern extents (see **Figure 5: Photographs D and E**).

4.6 Overall, the Plan Change Area currently retains a rural appearance with rural amenity values but is influenced by rural-residential / residential development

along its boundaries, and in views from elevated locations within the Plan Change Area.

4.7 In addition, appraisal of the Plan Change Area also requires consideration of what could be developed under its current zoning. Within the RLZ, the Plan Change Area could be subdivided into 1ha allotments as a restricted discretionary activity, and then development of approximately 12 residential dwellings and 12 minor residential units across the Plan Change Area with a height maximum of 8m as a permitted activity. This scenario forms part of the baseline environment, as described in **Section 2.2 of the LVEA**.

4.8 The Plan Change Area is visually discrete from publicly accessible locations, screened in most views by topography, vegetation and other residential development, as indicated by the three viewpoints used in the landscape assessment (see **Figures 4, 7 and 8** in the Graphic Supplement for the LVEA). It is also located away from principal viewing corridors (such as the Kāpiti Expressway, Mazengarb Road and Otaihanga Road). It is visible from a short extent (approximately 300m) of Ratanui Road, as the road nears and passes by the Plan Change Area.

4.9 Views of the Plan Change Area are limited to those from directly neighbouring properties which are often orientated towards the Plan Change Area. A number of rural residential properties abut the Plan Change Area boundary along parts of its southern, eastern and western boundaries (see **Figure 3** in the Graphic Supplement for the LVEA). Many of these properties 'borrow' views into the Plan Change Area to extend the view from their property across the wider farmland (see **Figure 5: Photographs A, B and C**, and **Figure 6: Photographs F, G and H** in the Graphic Supplement for the LVEA).

5. KEY FINDINGS, EFFECTS AND RECOMMENDATIONS

5.1 The conversion of the 12.65ha Plan Change Area from a rural lifestyle zoned land use to residential development (including provision for a retirement village) will result in a change in the character of the landscape. The development will involve the removal of existing vegetation and modification of the undulating dune topography, leading to a shift from a predominantly open, rural landscape to a suburban residential environment.

5.2 The LVEA recommended that a Landscape Plan is provided at the time of a resource consent application for any residential development or retirement village within the Plan Change Area, and should include the following (see **Section 7** of the LVEA):

- (a) Street trees, structure and amenity planting, including proposed vegetated and landscape buffers along the northern, eastern and partial southern boundaries of the Site (as shown on the Structure Plan), should be implemented to soften the rural lifestyle / general residential interface as well as providing adequate and appropriate screening for existing neighbouring residential dwellings.
- (b) Planting species, species mixes, and planting arrangement should reflect the location of the Site, using indigenous species which are typical of the Kāpiti area.
- (c) In the southern extent of the Site, boundary planting arrangements should reflect the more wooded / parkland character of the rural residential properties along Ratanui Road;
- (d) Sensitive earthworks designed to ensure that the development platforms are sensitively and effectively integrated into the existing terrain along the edges of the Site, particularly at the northern and eastern edges;
- (e) Reserves / open space design;
- (f) Connection to the transport network (roads, pedestrian and cycle links); and
- (g) Stormwater basin and swale design to reflect the coastal location of the site, seeking to restore areas of natural character across the Site.

5.3 In terms of the effects on landscape character of the local area, the proposed development would not fundamentally alter the broader characteristics of the surrounding environment. The Plan Change Area is located adjacent to established residential areas in Paraparaumu and Otaihanga and is identified in KCDC's Growth Strategy as a medium-priority greenfield growth area. The Plan Change builds on this strategic direction and represents a logical extension to the existing urban development while preventing sprawl across the wider area.

5.4 While located within the Coastal Environment, the Plan Change Area has low to very low levels of natural character. The topography of the Plan Change Area is reflective of coastal processes, however due to its modified, pastoral nature there are little other abiotic, biotic or experiential qualities which reflect the landscapes natural state. Considering the Plan Change Area's already modified condition: the grazed dunes, channelled stream, low value wetland

areas and the current and historical use of the land for agriculture; the effect of the proposed development on the natural character of the Plan Change Area is **very low**.

5.5 The proposed residential development will result in **low-moderate**³ adverse landscape effects during the construction phase, as well as a perceptible change in character. At the local scale, it would reduce the area of rural landscape between Paraparaumu and Otaihanga. At the district scale it would represent a logical change in land use by consolidating urban development within an existing envelope of development, rather than extending the town's edges further. Over time, the implementation and establishment of appropriate landscaping, including street trees, boundary planting and restoration of wetland areas, will assist the development to integrate into its landscape setting and effects will reduce to **very low**. As planting establishes, the Plan Change Area will read as a legible extension to Paraparaumu's growing urban fringe.

5.6 With regards to visual effects, the visual catchment is contained due to the Plan Change Area's topography and established in the surrounding area which limit views to within the area immediately surrounding the Plan Change Area. Public views are limited to short sections of Ratanui Road and glimpses from Otaihanga Road and Kotuku Park. As a consequence of the Plan Change Area's location and the limited visibility, adverse visual effects from public spaces are considered to be **low** or **very low**.

5.7 The LVEA presents a detailed evaluation of visual effects on 26 individual residential properties surrounding the Plan Change Area (see **Table 1** of the LVEA). This assessment is based on Plan Change Area observations and desktop analysis. Each property is assessed according to:

- (a) nature of view (open, partial, glimpsed, or no view);
- (b) distance from the Plan Change Area;
- (c) existing screening (vegetation, topography, built form);
- (d) orientation of dwellings and primary living areas; and
- (e) contextual factors (eg surrounding residential development).

³

Boffa Miskell 2024. Private Plan Change: Landscape Effects Assessment for Private Plan Change Request to the Kāpiti Coast District Plan. Report prepared by Boffa Miskell Limited for Welhom Developments Limited at p 16.

5.8 Effect ratings range from **neutral** and **very low** to **low-moderate**, depending on the degree of visibility and proximity. Key findings include:

- (a) Properties directly adjoining the southern boundary (eg 81, 85, 91 Ratanui Road) are assessed as experiencing **low-moderate** adverse visual effects due to open views and proximity;
- (b) Properties with intervening vegetation or greater separation (eg 97 Ratanui Road, 153 Mazengarb Road, 36–40 Otaihanga Road) are assessed as experiencing **low**, **very low** or **neutral** effects; and
- (c) properties to the north and east, where topography and vegetation provide screening, are generally assessed as experiencing **very low** effects.

5.9 The proposed mitigation and design control measures are expected to reduce visual effects over time and ensure appropriate integration into the surrounding landscape.

5.10 The Plan Change will inevitably alter the zoning and character of the Plan Change Area, shifting it from rural lifestyle to general residential. Due to its position between an existing urban area and the residential area of Otaihanga, as well as its proximity to existing infrastructure, the Plan Change Area is well positioned to accommodate denser development than that which is provided for under the current zoning. The proposed rezoning aligns with the strategic planning direction of the district and supports the efficient use of land within the urban growth boundary.

5.11 I consider that the Plan Change is appropriate in this location. It will fit into the existing landscape context and is adjacent to similar types of development. The anticipated visual and landscape effects will result in change however the nature of this change can be appropriately managed through future resource consent processes, including the implementation of a Landscape Plan which delivers on the design control measures set out in the LVEA to ensure sensitive and appropriate integration into the surrounding environment.

6. **RESPONSE TO THE COUNCIL OFFICER'S REPORT**

6.1 I have read the Section 42A Report and appendices relevant to the LVEA (Appendix 7: Urban Design Report and Appendix 12: Landscape, Natural Character and Visual Amenity Report).

- 6.2 The review of the LVEA, prepared by Angela McArthur, is in general agreement with the descriptions and assessment presented within the LVEA. There are a small number of matters, specifically in regard to natural character, treatment of the northern dune landform and perimeter planting, where Ms McArthur disagrees or requests amendments to the Structure Plan.
- 6.3 The urban design review, prepared by Ms Deyana Popova, also raises recommendations around the treatment of the dunes in the north of the Site and perimeter planting. I address each of these themes, in turn, below.

Natural Character and Naturalness

- 6.4 Paragraph 19 of Ms McArthur's report states that she disagrees that the natural character of the Site, including the dunes, is of low value. Ms McArthur states that the dune landform towards the rear of the site appears to be unmodified and part of the larger dune system and could be retained.
- 6.5 Furthermore, in Paragraph 24 Ms McArthur suggests the Site has moderate levels of naturalness due to the northern dune landform "*remaining unmodified*".
- 6.6 In my opinion, a moderate rating overstates the natural qualities of the Plan Change area. It is a modified landscape with rural appearing qualities. While the physical landform remains largely intact, there is very little naturalness or natural character remaining across the Plan Change area. The landscape has been cleared of vegetation to facilitate grazed pasture and vegetation and what does remain within the boundary is largely comprised of exotic species. The original swampland has been drained and the stream which passes through the Plan Change area is channelised. There are a notable lack of natural patterns and processes or experiential qualities associated with the Plan Change Area. Further, the large pond on the site is understood to be a constructed pond. Based on this, I maintain my low naturalness rating.

Treatment of the Northern Sand Dune

- 6.7 In her review, Ms McArthur considers the northern dune landform to be largely unmodified, recommending its retention and enhancement through indigenous planting where practicable. The review suggests that provisions should provide greater certainty around protecting the dune, noting that the current DEV3 policies only require "*sensitive integration*" rather than explicit retention.
- 6.8 Ms Popova's urban design review similarly identifies the northern dune as a characteristic feature of the Site's topography and recommends incorporating

it into the development layout to strengthen site identity and integration. The review suggests amendments to site-specific provisions to ensure retention, such as specifying a buffer or marking the dune on the Structure Plan. Both reviews highlight that, without explicit policy direction, retention at the resource consent stage would be uncertain.

6.9 The LVEA acknowledges that there are legible topographic patterns on the Site, such as the northern dune. The proposed DEV3 provisions require that development platforms be "*sensitively and effectively integrated into the existing terrain, particularly at the northern and eastern edges*". This approach enables earthworks to achieve practical development outcomes while maintaining a natural transition at the Site's edge. It does not preclude modification to the landforms, but rather promotes sensitive earthworks such as minimising abrupt level changes and favouring natural batters over retaining walls. This will achieve the intent of the LVEA by mitigating adverse effects on landform and visual character, without locking in an inflexible constraint that may not be warranted given the site's overall level of modification.

Perimeter Planting – location and extent

6.10 In a number of locations in their reports, Ms McArthur and Ms Popova suggest that the vegetated or landscaped buffer should be extended around the entire perimeter of the Plan Change Site in order to soften the transition from the RLZ to GRZ, mitigate construction effects and deliver a more coherent spatial and amenity outcome. A minimum of 5m is suggested to be included in the provisions.

6.11 I acknowledge and agree with the importance of providing a sensitive transition between the proposed GRZ and adjoining RLZ properties. The proposed vegetated and landscape buffers reflect this. However, I do not consider that a continuous buffer around the entire Site boundary is necessary or appropriate.

6.12 The intent of the LVEA recommendations is to deliver targeted mitigation where visual sensitivity is greatest, specifically along boundaries where neighbouring properties have direct views into the Site. Applying buffers indiscriminately would not deliver meaningful landscape outcomes and could create an artificial edge that is inconsistent with the evolving character of the wider area, which is anticipated to undergo further urban development over time. In this context, a site-wide perimeter buffer risks isolating the development rather than enabling its integration into the surrounding urban

fabric. This point is also highlighted in the Section 42A report where the reporter summarises a point made in the Urban Design review that:⁴

...should the wider area be rezoned in the future, the PPC4 site would appear somewhat segregated from its anticipated urban surroundings, due to the proposed boundary treatments.

- 6.13 In my opinion, a more nuanced approach, focused on areas of high visual sensitivity and informed by detailed design at the resource consent stage, will better achieve the intent of the LVEA to ensure sensitive and effective integration into the existing terrain and local context.
- 6.14 Similarly, there is discussion across the relevant Section 42A reports regarding the proposed width of the vegetated and landscape buffers. The Reporter has recommended amendments to two clauses in DEV3-P1 (clauses (c) and (e)) which require a minimum width of 5m for these buffers.
- 6.15 In my section 92 response, further information was provided on the nature of each of the buffers proposed. The vegetated buffer was intended in locations where more substantial screening or filtering of views into the Site was required from neighbouring residential properties. The landscape buffer was proposed to ensure an appropriate integration between the Plan Change Site and adjacent landscape. A 5m buffer width was indicated as it is considered that this would allow enough space for planting which would create a meaningful and effective screen.
- 6.16 In further consideration following the submission of the section 92 response, applying a uniform 5m width across the entire Site boundary would not reflect the varying levels of visual sensitivity around the perimeter. In some locations, such as where the Site adjoins land that is likely to be urbanised in the future, a narrower buffer or alternative treatment may be more appropriate and consistent with the intent of integrated urban form.
- 6.17 In my view, the plan change provisions should set out the principle of providing landscape and vegetated buffers to manage visual effects and soften transitions, leaving the detailed design, including minimum width buffer, to be determined at the resource consent stage and ensuring flexibility to respond to site-specific conditions and future context, while still achieving the outcomes anticipated in the LVEA.

7. RESPONSE TO SUBMISSIONS

7.1 Eighteen submissions and two further submissions were received on the proposed plan change. Of these, ten submissions specifically cite landscape and / or visual considerations.⁵ These relate to:

- (a) Visual effects on neighbouring properties;
- (b) Loss of Rural Character and Amenity; and
- (c) Delivery of proposed mitigation measures.

7.2 I respond to these submissions thematically below.

Visual and Amenity Effects on Neighbouring Properties

7.3 Six submitters specifically refer to matters relating to visual and amenity effects on neighbouring properties as a reason for opposition to the plan change, raising concerns about building height, density, and proximity to boundaries, particularly where properties have open views and limited screening.⁶

7.4 Submitter 6 requested clarity on how the effect rating was determined in relation to their property (81 Ratanui Road) and whether this could be changed. The visual effect for 81 Ratanui Road was assessed as **low-moderate** (adverse) in the LVEA. This rating identifies that there would be a discernible change to the view from this property as a result of the proposed development but takes into account what is permitted in the underlying zone, the anticipation of change as set out in KCDC's 2022 Growth Strategy – Te Tupu Pai, and the ability to deliver effective mitigation which will reduce the visual effect. Higher effects on this property are able to be mitigated through the landscape design controls set out in the LVEA, which intend to "soften the rural lifestyle / general residential interface as well as providing adequate and appropriate screening for existing neighbouring residential dwellings".⁷

7.5 Submitter 6 also highlighted that they had not been engaged with regarding approval to enter the property for the purpose of confirming the visual assessment. Submitter 15 also notes that no access was requested from neighbouring properties during the assessment process.

⁵ Samuel Day (Submission #1); Lang Family Trust (Submission #2); Stephen Alexander and Linda Parsons (Submission #6); Derek and Helen Foo (Submission #7); Sarah and Dane Coles (Submission #8); Montcalm Family Trust (Submission #10); Alan Kelly (Submission #11); Hayden Mihaila-Milburn (Submission #14); Paul Coggan (Submission #15); and Roy and Meryl Opie (Submission #18).

⁶ Submission #6, Submission #7, Submission #8, Submission #10, Submission #14 and Submission #15.

⁷ See Section 7, bullet point 1 of the LVEA.

7.6 No photography or assessment has been undertaken from within any neighbouring properties. The assessment has focused on the anticipated change in character and amenity resulting from rezoning, rather than on specific building layouts, as no detailed design for a retirement village or residential subdivision has yet been proposed. At this stage, the location, form, and appearance of future development remain indicative only. The LVEA has evaluated the likely effects of a shift from Rural Lifestyle to General Residential zoning, including the introduction of higher-density built form and associated changes to landform and vegetation. This provides a robust basis for understanding the scale and nature of potential visual and character effects. Once a detailed layout is prepared, a resource consent application will include refined assessments and visual simulations to illustrate the actual change in views from neighbouring properties.

7.7 Submitter 7 disagrees with the assessment presented in the LVEA for their property, presenting a range of reasons for this difference in opinion which includes the scale of the change (density increase, building height increase), the currently open views to the development area, and the changes to the primary outlook from the dwelling. Submitter 7 also questions whether mitigation can be relied upon given there is no guarantee that mitigation will work.

7.8 The LVEA sought to assess the effects resulting from the change of land use (ie rural residential to general residential within an area highlighted by KCDC for future residential growth), rather than responding to a specific change in view, as the detail of the change is still unknown. It considered the existing view, the wider context, the anticipated outcome for the Plan Change Area in relation to relevant policy documents and the ability for appropriate mitigation to reduce effects.

7.9 A detailed landscape design and landscape management plan would be prepared as part of any resource consent application. These drawings and reports will include information on planting densities and plant sizes, and maintenance regimes and the approach to ensuring successful plant establishment. The landscape design and landscape management plan would be created and delivered to ensure effects on adjacent neighbours are appropriately mitigated while also ensuring that development is well integrated into the surrounding context. Any plant failure would require replacement during the maintenance period.

7.10 Submitter 7 proposes a number of amendments to the plan change request, including 5m widths of buffers along the shared southern boundary, extensions

to the buffers proposed on the structure plan, use of native species endemic to the Kapiti Region, maintenance of mitigation planting and building heights along the shared border.

- 7.11 The proposed vegetated buffers would use a mix of predominantly native species with varying heights, ranging from shrubs and undergrowth species to larger trees (in appropriate locations – an indicative list was provided in the section 92 response). The buffer seeks to tie into existing vegetation, while species selection, planting density, and plant height would be managed to ensure that the vegetated buffer provides effective visual screening without materially reducing daylight or creating adverse shading effects. As outlined in Paragraphs 6.13 to 6.16 above, the width of landscape and vegetated buffers should be determined at the resource consent stage, allowing flexibility to tailor screening and interface treatments to site-specific conditions and areas of greatest visual sensitivity. This approach ensures that mitigation is effective and proportionate, rather than applying a uniform standard that may not be necessary across the entire site.
- 7.12 All landscape boundary treatments proposed as part of the final Plan Change Area design will be designed to encourage biodiversity and improve habitat for native species. Species to be planted within the landscape buffers at the edges of the Plan Change Area will be selected based on their suitability to the Kapiti region and take into account those recommended in Greater Wellington Regional Council's Native Plant Guide. As described in Paragraph 7.10, a detailed landscape design and landscape management plan would be prepared as part of any resource consent application to ensure planting success.
- 7.13 Submitter 10 supports the plan change in principle but raises concerns about multi-storey buildings being located close to their boundary, particularly with only a 5m buffer. They consider this incongruous with the current Rural Lifestyle zoning and note that such proximity could affect privacy, amenity, and future development potential if their property is rezoned. The submission requests that height restrictions be imposed along the perimeter of the Plan Change Area and that an appropriate landscape buffer be provided post-construction to mitigate visual and amenity impacts.
- 7.14 Submitter 8 had similar concerns in regard to minimum setbacks, requesting that no buildings be permitted within a minimum setback distance of 10 metres from existing rural boundaries (in particular their property) to preserve privacy and reduce visual impact; that only single-storey homes be permitted along the boundary of existing rural properties to minimise loss of outlook, light, and

character; that the density be reduced to a maximum of 150 dwellings; that privacy planting of ideally 2 metres, maximum of 6 metres in height be installed by the developer along affected boundaries prior to construction, to soften visual impacts and maintain the semi-rural feel. The submitter noted that planting exceeding 6m in height would affect the long-lasting sun on the submitter's property.

7.15 I acknowledge the submitters' concerns regarding the potential visual impact of taller buildings and outdoor spaces near shared boundaries. The LVEA recommends managing these effects through sensitive earthworks and landscape integration, rather than through prescriptive height controls. Specifically, it advises that development platforms should be sensitively and effectively integrated into the existing terrain, with retaining walls minimised in favour of natural batters where practicable, and that vegetated buffers be provided to soften transitions and screen sensitive views. Where outdoor spaces are located near boundaries, layered planting can further reduce visual intrusion and maintain amenity and sunlight. This approach allows flexibility to respond to site-specific conditions while achieving the outcomes anticipated by the LVEA. Imposing fixed height limits, density limits, or rigid buffer dimensions at the plan change stage would unnecessarily constrain design options and is not considered required to achieve these landscape outcomes.

7.16 Submitter 14 raises concern that the application's justification, that buildings up to 10m are permitted in the current RLZ and therefore the visual impact of GRZ buildings is the same, is insufficient, particularly given the increased density.

7.17 I acknowledge that while the permitted height under the RLZ is comparable to that of the GRZ, the visual impact of development is not determined by height alone. The LVEA does not rely solely on permitted height comparisons to assess visual effects. Instead, it considers this in the context of the number and proximity of buildings, the orientation and nature of views from neighbouring properties, the presence or absence of screening vegetation or topography, and the anticipated change in character from rural lifestyle to suburban residential.

7.18 The LVEA acknowledges that the proposed development will result in a perceptible change in character, and that properties which directly adjoin the Plan Change Area will experience adverse visual effects. These effects are not dismissed as equivalent to RLZ outcomes but rather they are assessed in context and mitigated through recommended design controls.

7.19 Submitter 15 raised concerns that:

...the impact on 27a Ratanui Road is incomplete, the well mature tree mentioned in the landscape and visual assessment are predominantly deciduous in nature, old and planned for removal. The proposed 2–3-storey walls and roof-heights up to 10 m will loom over remaining lifestyle blocks. The small, vegetated buffer strips proposed along some of the edges cannot fully mitigate the sense of enclosure and loss of openness valued by adjoining residents. The proposal should be amended to require a landscaped and planted buffer along the entire perimeter of the site.

7.20 The LVEA was undertaken based on the existing environment observed at the time of assessment. This included describing the trees, shelterbelts, and areas of vegetation that were present during the site visits and desktop review and taking account of the screening or filtering these provided. The assessment does not speculate on the potential removal or failure of vegetation on adjacent properties, as such changes cannot be reliably predicted. In addition, the mitigation proposed within the Structure Plan, such as the vegetated buffer along site boundaries, has been designed to provide effective screening and visual softening independent of vegetation on adjoining properties. While existing planting on neighbouring sites currently contributes to visual integration, the proposed buffer planting will achieve the same outcome if adjacent vegetation is removed, ensuring that landscape and visual effects are appropriately managed.

7.21 The recommendations presented in the landscape assessment seek to ensure that, when any developed design proposals are lodged as part of a resource consent application, interfaces with the Plan Change Area edges are sensitively designed to soften the rural lifestyle / general residential interface as well as providing adequate and appropriate screening for existing neighbouring residential dwellings. Any application will be required to show how these recommendations are delivered by the proposals.

7.22 While fully surrounding the Plan Change Area with a vegetated buffer would certainly assist with screening the proposed development in views from neighbouring properties, the design response also needs to ensure that the proposed future residents of this area do not live within an 'island' and instead are well integrated into the broader context.

Loss of Rural Character

7.23 A number of submitters have expressed concern that the proposed rezoning and development would erode the semi-rural character of Otaihanga and Ratanui Road. In their submission, Submitter 1 notes:

Ratanui Road is the beginning of the semi-rural area of Otaihanga. It has significant natural beauty and an established semi-rural character. Building a retirement village on such a large plot of land would destroy that.

7.24 Submitter 8 states:

The proposed development of a large-scale retirement village fundamentally alters the rural feel of Ratanui Road and its surrounds. My husband and I purposefully purchased 91 Ratanui Road to build our forever home for our young family, specifically because of the area's rural zoning and the minimum 4000sqm lot sizes, which promised privacy, space, and a peaceful environment. This development contradicts what we and others in the area were told when we bought here - that the land would remain low-density and rural in nature. The proposal introduces high-density housing and increased building height, which is incompatible with the existing character and landscape.

7.25 The Plan Change Area lies within the Coastal Environment. The Plan Change Area has not been identified as an Outstanding Natural Feature of Landscape ("ONFL"), or as a Significant Amenity Landscape within the Kapiti Coast District Plan. The LVEA acknowledges that the Plan Change Area is currently rural in character, with undulating topography, open paddocks, and scattered vegetation. Due to its character and location, the Plan Change Area is considered to have rural amenity values, however, it is a modified landscape with few natural qualities remaining. Water courses have been channelised, vegetation cleared from the dunes and replaced with exotic grassland and earthworks have altered the topography in places.

7.26 I agree that there would be a change to the rural character of the Plan Change Area, with the loss of the undulating topography, rural fields and currently open character. The Plan Change Area is surrounded by areas of urban/residential development (Paraparaumu / Otaihanga) and is already zoned for residential development (which can allow for up to 12 dwellings and 12 minor residential units). The Plan Change Area is a logical location for residential growth in this part of Paraparaumu - consolidating and infilling existing development, utilising existing infrastructure and the road network and would ensure the efficient use of land.

7.27 This approach is supported in the Kāpiti Growth Strategy 2022, where the Plan Change Area lies within the 'Medium Priority Greenfield Growth Area',

indicating that extensions to the current urban area will occur in this area over the medium term. Growth Areas have been identified to ensure that progressive urban development can occur while safeguarding valued green spaces, natural ecosystems and highly productive land which has not already been impacted by fragmentation.

Delivery of Proposed Mitigation

7.28 Submitter 18 stated that "*landscape needs to be completed to keep the rural appearance at the entrance of the retirement village*". As already noted, the recommendations presented in the landscape assessment seek to ensure that interfaces with the Plan Change Area edges are sensitively designed to reflect the character of the area.

7.29 Submitter 8 noted that, in the area around their property, the land "*includes established mature trees that are home to a wide range of native birds, including kererū, tūī, ruru (morepork), quail, and fantails. These birds are an everyday part of life for our children, and their habitats are at risk of being lost or irreparably damaged by large-scale earthworks and construction*".

7.30 I will defer on the subject of habitat loss to Dr Keesing of BlueGreen Ecology. However, the landscape recommendations within the LVEA and the section 92 response require that all landscape boundary treatments proposed as part of the final Plan Change Area design will be designed to encourage biodiversity and improve habitat for native species. Species to be planted within the landscape buffers at the edges of the Plan Change Area will be selected based on their suitability to the Kapiti region.

7.31 Submitter 11 specifically requested protection and planting of the shared sand dune along the northern boundary. The LVEA supports this, recommending "*Sensitive earthworks designed to ensure that the development platforms are sensitively and effectively integrated into the existing terrain along the edges of the Plan Change Area, particularly at the northern and eastern edges*⁸."

7.32 As identified by the submitter, the LVEA recommends that future development be sensitively integrated into the existing terrain, particularly along the northern and eastern edges of the Site. While this does not preclude earthworks, it requires that any modifications are carefully designed to maintain a natural transition at the Site's edge and avoid abrupt changes in topography. The intent is to achieve a visually cohesive outcome that responds to the landform, consistent with the recommendations in the LVEA. Detailed design at the

⁸

See Section 7 of the LVEA.

resource consent stage will provide the opportunity to demonstrate how this integration can be achieved while enabling development.

7.33 The Structure Plan includes for a landscape buffer across the northern boundary. The purpose of the landscape buffer is to deliver an appropriate design response to ensure the integration between the new development and adjacent Plan Change Areas / land use. The landscaped buffer is not necessarily seeking to fully screen or filter views from neighbouring properties / viewers, but it instead would ensure that future development across the Plan Change Area is successfully and sensitively integrated into the landscape and wider context. Therefore, the landscaped buffer may not only be implemented through planting, but could be delivered through appropriate fencing treatments, landscape bunds and earthworks design (or a combination of these) to ensure integration with the wider landform etc.

8. CONCLUSION

8.1 The proposed rezoning of the Plan Change Area from Rural Lifestyle Zone to General Residential Zone is appropriate in this location and aligns with the strategic growth direction of the Kapiti Coast District. While the change will result in a shift in landscape character and amenity, these effects are anticipated and can be appropriately managed through the design controls and mitigation measures outlined in the LVEA.

8.2 The Plan Change Area is well positioned to accommodate residential development, given its proximity to existing urban areas and infrastructure. The landscape and visual effects identified, which range from neutral to low-moderate adverse, are not significant and will reduce over time as planting establishes and the development integrates into its context. Sensitive earthworks, vegetated and landscaped buffers, and detailed planting plans at the resource consent stage will ensure that the interface with adjoining properties and the adjacent landscape is appropriately managed and that the development responds to the existing landform and character.

8.3 For these reasons, I consider that the application should be approved.

Alexandra Gardiner

16 January 2026