

**Before the Independent Hearings Panel  
At Wellington City Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Wellington City District Plan

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**Statement of evidence of Clive Anstey**

**Date: 26.3.2024**

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## **INTRODUCTION**

- 1 My full name is Clive Anstey. I have been self- employed as a Landscape and Resource Consultant since 1999. Prior to this I spent 31 years in the Public Service; the Forest Service, the Ministry of Forestry, and finally, the Department of Conservation.
- 2 I have prepared this statement of evidence on behalf of the Wellington City Council (the **Council**) in respect of technical related matters arising from the submissions and further submissions on the Proposed Wellington City District Plan (the **PDP**).
- 3 Specifically, this statement of evidence relates to matters raised by submitters in relation to the Natural Character of the Coastal Environment, Outstanding Landscapes and Features, Significant Amenity Landscapes, and Ridgelines and Hilltops.
- 4 I am authorised to provide this evidence on behalf of the Council.

## **QUALIFICATIONS AND EXPERIENCE**

- 5 I hold the qualifications of BSc Victoria University; BSc Forestry, Aberdeen University; Post Graduate Diploma in Landscape Architecture, Lincoln College. I am a member of the NZI Foresters and a Fellow of the NZI Landscape Architects. I am also a Registered Landscape Architect.
- 6 I have experience in Forest Management, Conservation Management, Landscape Planning, and Design. I was national manager of planning in the Department of Conservation with responsibility for overseeing the development of 14 Conservation Management Plans, and for conservation advocacy under the RMA. As a consultant my focus has been on landscape matters in relation to plans and policies prepared under the RMA, as well as landscape assessments and consenting processes. Until recently I held 'Making Good Decisions' certification.

## **CODE OF CONDUCT**

7 I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court, which came into effect on 1 January 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence. My qualifications as an expert are set out above. Except where I state that 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.

## **INVOLVEMENT WITH THE PROPOSED DISTRICT PLAN**

8 I was contracted to assist Council in November 2023. I am familiar with the legislation, policies, and assessment processes that support the 'Landscape Management', provisions in the Proposed District Plan. I am also familiar with the Wellington landscape and have been involved in a number of council projects over the past twenty years, notably the council's 'Rural Design Guide', the strategic management of the Outer Green Belt, and the management of council reserves.

## **SCOPE OF EVIDENCE**

9 My statement of evidence addresses the following matters:

- i. Submissions received in relation to Schedule 10
- ii. Submissions received in relation to Schedule 11
- iii. Extent of the Coastal Environment overlay
- iv. Submissions received in relation to Schedule 12
- v. Rezoning submissions on the extent of ONFLs and SALs
- vi. Rezoning submissions on the extent of the ridgelines and hilltops overlay.

## **SCHEDULE 10 – OUTSTANDING NATURAL FEATURES AND LANDSCAPES**

### **Matters raised by submitters**

#### General matters

10 Forest and Bird (345.413 [supported by Meridian FS101.186]) seek to include the values of each ONFL in Schedule 10 to give effect to the RPS and NZCPS.

Response:

11 I agree this would be of benefit. The detail of the values and characteristics is included in the Boffa Miskell 2019 Report<sup>1</sup>, and in my view this detail should be included in Schedule 10.

#### Raukawa Coast Cook Strait

12 Forest and Bird (345.414 [opposed by Meridian FS101.187]) seeks to include a new ONF Boom Rock/Pipinui Point Escarpment in the schedule. If the relief sought is not accepted, they seek to clarify in the planning maps whether Boom Rock/Pipinui Point Escarpment is instead contained within the Raukawa Coast Cook Strait ONL.

Response:

13 Boom Rock/Pipinui Point Escarpment was recognised as an Outstanding Natural Feature in Boffa Miskell Assessment published in 2017<sup>2</sup> but in the 2019 update Boom Rock/Pipinui Point Escarpment was treated as part of the Raukawa Cook Strait Coast Outstanding Natural Landscape. This is because the values within the Boom Rock/Papanui Escarpment ONF, and their rankings, were similar to those of the Raukawa Cook Strait ONL. It therefore made sense to amalgamate the units and have one set of values in Schedule 10. I would note that the high values of

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<sup>1</sup> Wellington City Landscape Evaluation. Prepared for Wellington City Council by Boffa Miskell, April 2019.

<sup>2</sup> Wellington City Landscape Evaluation. Prepared for Wellington City Council by Boffa Miskell, April 2017.

this section of Wellington's coast are further highlighted in their recognition as having High Natural Character.

- 14 Meridian (228.123 and 228.124) seeks to amend the Site Summary for the Raukawa Coast Cook Strait to acknowledge the visible presence of existing turbines and other built structures in the West Wind and Mill Creek wind farms which form part of the backdrop to the coastal escarpments.

Response:

- 15 The wind farms are not located within the ONL/F and therefore not part of the site summary.
- 16 Terawhiti Station (411.29) seeks to delete Raukawa Coast Cook Strait from the schedule as an Outstanding Natural Feature.

Response:

- 17 Terawhiti Hill is scheduled as an Outstanding Natural Feature within the wider Raukawa Cook Strait Coast Outstanding Natural Landscape. (The area between the coastal edge and the ridgeline is also scheduled as having a very high Natural Character.) The Outstanding Natural Feature and the Outstanding Natural Landscape designations are supported by the findings of the Boffa Miskell Assessment of the City's landscapes undertaken in 2017. This assessment was undertaken in response to a requirement of the Wellington Regional Policy Statement and carried out in accordance with direction provided by the Resource Management Act, the Wellington Regional Policy Statement, and related Environment Court decisions.
- 18 The 2017 Assessment was undertaken in a systematic manner and landscapes assessed according to recognised criteria, then ranked to establish their relative values and significance. The values assessed were ranked on a seven point scale with 'High' and 'Very High' being six and seven respectively. For both Raukawa Cook Strait Coast and Terawhiti Hill the rankings were 'High' or 'Very High'. They were ranked as being

some of the most outstanding in the City. To remove Terawhiti Hill or the wider coastal landscape of Raukawa Cook Straight from the schedules would undermine the integrity of the assessment's findings and the protection of the City's most spectacular landscapes. I am satisfied that the Boffa Miskell assessment was undertaken in accordance with policy guidance and best practice. My recommendation is therefore that the request be declined.

Te Rimurapa Sinclair Head/ Pariwhero Red Rocks; Boom Rock/ Pipinui Point Escarpment.

- 19 Barry Insull (32.16 and 32.17) seeks to amend the title of "Te Rimurapa Sinclair Head/Pipinui Point Pariwhero Red Rocks" by removing Pipinui Point. Mr Insull further seeks to amend the title to "Sinclair Head/Te Rimurapa".
- 20 Barry Insull (32.18, 32.19 and 32.20) seeks to amend the language in the Site Summary for Te Rimurapa Sinclair Head/Pipinui Point Pariwhero Red Rocks; to correct "Te Rimurapapa" to "Te Rimurapa" in the first sentence, and to amend "colonies" to "colony". Mr Insull also seeks to include a reference to the Historic Reserve in the area.

Response:

- 21 The 2017 assessment undertaken by Boffa Miskell identified Boom Rock/ Pipinui Point as one contiguous and Outstanding Natural Feature. The 2019 assessment amalgamated this feature with the Raukawa Cook Straight Coast Outstanding Natural Landscape. Rimurapa Sinclair Head/Parwhero Red Rocks was also assessed as a contiguous Outstanding Feature in 2017 and this should be made clear in the PDP. Mr Insull's submissions are supported.
- 22 The revised Schedule 10 includes additional detail from the 2017 Boffa Miskell Assessment. The Assessment notes the Scientific Reserve. The 'colonies' referred to in the assessment includes a range of species rather the 'colony' of a particular species. The revised schedule should make this clear.

## Terawhiti

- 23 Terawhiti Station (411.28) seeks to delete Terawhiti from the schedule as an Outstanding Natural Feature.

Response:

This request is not supported for reasons outlined in para 18 above.

## Taputeranga Island

- 24 Barry Insull (32.21) seeks to clarify the Site Summary for Taputeranga Island by listing threatened and rare species of birds and lizards that have been accurately identified in the area.

Response:

- 25 The natural science values from the 2017 Boffa Report will be added to the detail contained in Schedule 10. This detail includes reference to the species of concern to Mr Insull.

## **SCHEDULE 11 – SPECIAL AMENITY LANDSCAPES**

### **Matters raised by submitters**

#### General matters

- 26 Forest and Bird (345.415) seek to amend the schedule to include values of each SAL to give effect to the RPS and NZCPS.
- 27 Horokiwi Quarries (271.95) seeks to clarify what characteristics of Special Amenity Landscapes are in the PDP, and in particular the Natural Features and Landscapes Chapter.

Response:

- 28 I agree that detail from the 2019 Assessment should be included in the schedule to provide a more comprehensive guide to those wishing to apply for resource consents. Forest and Bird request the detail so that the 'values' of each Significant Amenity Landscape in the PDP are clear and transparent. I support the requests of both submitters.

29 John Tiley (142.30 [opposed by Meridian FS101.188]) and Churton Park Community Association (189.30 [opposed by Meridian FS101.189]) seek that the 18 identified ridgelines and hilltops (and Marshalls Ridge) be listed in either Schedule 11 or Schedule 12.

Response:

30 Ridgelines and Hilltops are recognised primarily for their visual amenity values and in providing for a continuity in the character and quality of the city's wider landscapes. Ridgelines and Hilltops provide a framework within which Outstanding Natural Landscapes and Features, and Significant Amenity Landscapes are generally located; the Ridgelines and Hilltops overlay highlights a coherence and continuity across the Wellington landscape. The relationship between Ridgelines and Hilltops, Outstanding Landscapes and Features, and Significant Amenity Landscapes was clarified in a report prepared by Isthmus in 2020<sup>3</sup>. This report notes in relation to Ridgelines and Hilltops, *"The Overlay captures areas with a range of landscape values, with the boundary and provisions defined primarily to manage effects on visual amenity, and the boundary set through a consideration of visibility, slope and landform continuum"*. The provisions in the PDP are designed to contain adverse visual amenity effects on prominent ridgelines and hilltops across the city. The Isthmus report recommended that the Ridgelines and Hilltops overlay be retained. While recognising that other landscape provisions captured the values of Ridgelines and Hilltops in some areas, the Isthmus Report found they did not provide for the coherence of the wider landscape. I agree with the findings of the Isthmus Report and therefore recommend that the Ridgelines and Hilltops overlay be retained and that the areas it covers not be incorporated into Schedule 11. Schedule 12 deals with Natural Character in the Coastal Environment and does not address the wider landscape. Schedule 12 and the related planning provisions are designed to manage values in the coastal environment.

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<sup>3</sup> Wellington City Council Ridges and Hilltops Overlay- Initial Review; Isthmus, April 2020



### Outer Green Belt

- 31 Forest and Bird (345.416) seek to include a new SAL Outer Green Belt to the schedule.
- 32 Kilmarston Companies (290.75) seeks to retain the Outer Green Belt in the schedule as notified.
- 33 Penny Griffith (418.7) seeks to retain the schedule as notified with the inclusion of the Outer Green Belt locations.

### Response:

- 34 The Assessment undertaken by Boffa Miskell in 2017 was comprehensive, covering the whole of Wellington City. The report has an Appendix which outlines their methodology. In this they say: *“Drawing on feedback received from consultation with WCC officers, together with information contained within the 2014 Wellington Landscape Character Description, local knowledge, field investigation, and interrogation of GIS data sets, an initial list of ‘candidate sites’ was compiled for evaluation. To ensure overall consistency, sites contained within this list were assessed using a ranking system and qualifying thresholds.”* The candidate sites were assessed for their Natural Science Values, their Sensory Factors, and their Shared and Recognised Values. They were ranked on a seven point scale. Having read this report I am satisfied that the areas identified as Special Amenity Landscapes are the outcome of a thorough and even handed process covering the whole of the city. The 2019 report reiterated these findings.
- 35 In drafting the PDP Council resolved to extend the Special Amenity Landscape to cover virtually the whole of the Outer Green Belt. However, in concluding that only two sections of the Outer Green Belt, Mt Kaukau and Wrights Hill/Makara Peak, qualified as Special Amenity Landscapes, the Boffa Miskell assessment only lists values for these

areas. To list values for the extended Special Amenity across the wider Outer Green Belt Landscape a reassessment would be required.

- 36 In my opinion the values listed for the two areas the Boffa Miskell report identifies as Special Amenity Landscapes exist, to a greater or lesser extent, across the whole of the Outer Green Belt. The areas the Boffa Miskell assessment did not recognise as Special Amenity Landscapes presumably failed to reach the thresholds they set. I would therefore suggest that in assessing the effects of any proposed activity on the Outer Green Belt the values listed in the Boffa Miskell Report be assumed to exist across the whole Outer Green Belt.

### **THE COASTAL ENVIRONMENT**

- 37 Mr Jamie Sirl, Senior Planning Advisor with the council, has asked me to provide advice on matters relating to the location of the boundary of the Coastal Environment, and the identification of Natural Character of the Coastal Environment.

- 38 The spatial extent of the Coastal Environment and High Coastal Natural Character overlay mapped in the PDP are the outcome of a Landscape Assessments undertaken by Boffa Miskell, one in 2014 and a second in 2016.

- 39 The boundary of the Coastal Environment was determined in the 2014<sup>4</sup> assessment. This assessment was undertaken in accordance with best practice to satisfy the requirements of the NZCPS 2010, Policy 1, *'Extent and Characteristics of the Coastal Environment.'* The assessment determined the boundary of significant coastal influences which for most of Wellington's coast is along the first major ridgeline or along the top of a coastal escarpment. Where landform didn't clearly define the boundary the extent of significant coastal influences was determined in accordance with the nine criteria listed in the NZCPS 2010; Policy 1. These areas tended to be flatter, more accessible, and therefore more

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<sup>4</sup> Coastal Environment Wellington City; Prepared for Wellington City Council by Boffa Miskell, December 2014

developed. In my opinion the boundary identified is well supported by the assessment undertaken and the criteria adopted.

40 Horokiwi Quarries Limited Submission 271 requested a change in the location of the boundary of the Coastal Environment. This request was supported by an assessment undertaken by Shannon Bray, a Registered Landscape Architect. An onsite meeting was held with Mr Bray on the 7<sup>th</sup> November 2023 to clarify his position and discuss the boundary of the Coastal Environment on the ground. In my opinion the assumptions Mr Bray makes in undertaking his assessment are not consistent with those adopted in the 2014 Boffa Assessment.

41 It has generally been accepted by the profession, endorsed by the Environment Court<sup>5</sup>, that the boundary of the Coastal Environment should be located along the first significant inland ridge or at the limit of 'coastal influences'. The 2014 Assessment located the boundary across clear physical features such as ridgelines, hills, and escarpments where these were apparent. The boundary as shown on the PDP Coastal Environment overlay reflects this.

42 The Horokiwi Quarry is located above the escarpment on the Western Hills above Wellington Harbour. The boundary of the Coastal Environment along the Western Hills is consistent in its relationship to the existing topography except where it crosses the Quarry site. Here the landform has been radically altered; former ridges and hilltops have been removed by quarrying activities. The boundary on the mapped overlay is therefore an approximation of where the boundary would once have been. In my opinion this approximation is acceptable in being consistent with the methodology as well as the broader landform patterns of the harbours Western Hills.

43 Mr Bray adopts an alternative approach to establishing the boundary of the Coastal Environment. Mr Bray argues that the Coastal Environment

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<sup>5</sup> Kaupokonui Beach Society Inc and vrs V South Taranaki District Council 2008; Decision W30.

boundary should be defined on the basis of values rather than topography, and that to qualify as 'Coastal Environment' the area should have significant Biotic, Abiotic, and Experiential values. Mr Bray assesses all values within the quarried area of the Coastal Environment (as currently shown on the PDP overlay) as low and proposes that the boundary be moved to include only areas with significant Natural Character values; to the boundary of existing workings at the top of the coastal escarpment, the upper boundary of indigenous forest regeneration on the coastal escarpment.

44 In my opinion Mr Bray's approach is not consistent with that adopted in the 2014 Boffa Assessment which establishes the boundary of the Coastal Environment on the basis of physical, topographical, features. The 2016 assessment then undertakes an assessment within the Coastal Environment to identify areas with High, Very High, or Outstanding Natural Character. As the High Coastal Natural Character Areas overlay in the PDP illustrates, there are considerable areas within the Coastal Environment that fail to qualify, and the Horokiwi Quarry is no exception.

45 In an Appendix to their 2016 Assessment the authors say; *"When determining the overall natural character evaluation at the area scale, greater weighting has been given to natural science attributes, which encompass abiotic and biotic values, compared with experiential values. This recognises that natural character is a condition rather than a quality or value; it exists regardless of experiential attributes."* While the Quarry may not have values affording it High Natural Character status it is never the less located within the Coastal Environment. The fact that the quarry has low experiential values, as Mr Bray argues and I agree, does not exclude it from the coastal environment. In my opinion the boundary as notified has been established objectively and in accord with best practice. My recommendation is therefore that the boundary be retained as established by the Boffa Miskell Assessment.

46 WIAL [406.15, 406.16, 406.286, and 406.287] is concerned that the complex relationship between the Coastal Environment, Infrastructure and Airport Zone provisions creates an inefficient consenting pathway for airport and airport related activities. Consequently, they seek that the Coastal Environment Overlay is removed from the Airport Zone. For similar reasons to those set out above in response to Horokiwi Quarry, whilst acknowledging that the Airport is located in an areas of the Coastal Environment that is highly modified with limited 'natural' character remaining, I consider that the Airport is appropriately identified as being located within the Coastal Environment.

## **SCHEDULE 12- HIGH COASTAL NATURAL CHARACTER AREAS**

### **General matters raised by submitters**

47 Several submitters, notably Greater Wellington Regional Council and Forest and Bird, expressed the view that Schedule 12 should include a list of the values contributing to the natural character of the coastal environment generally as well as for each of the areas assessed as having High or Very High Natural Character. Their rationale was that for any person undertaking an activity in the coastal environment the values to be protected and sustained should be made explicit in the plan.

48 Royal Forest and Bird Society (345.417, 345.418, & 345.419) submissions request the clarification of values in areas of the Coastal Environment assessed as having High or Very High Natural Character, and their listing in Schedule 12. The submissions emphasise the need to identify the attributes outlined in Policy 13 of the NZCPS 2010. While the notified Schedule 12 provides a summary rating for each of biotic, abiotic, and experiential values in areas with High or Very High Natural Character, it does not include the level of detail provided in the Boffa Miskell report, detail deriving from the assessment of NZCPS Policy 13 attributes. I agree that this detail is essential in informing resource management generally and consenting processes in particular.

- 49 Greater Wellington Regional Council (GWRC) (351.351, 351.352, 351.353, 351.354, 351.355) submissions reflect the concerns of Forest and Bird in similarly requesting the inclusion in Schedule 12 of the attributes to which value attaches in the Coastal Environment. GWRC wish to see detail of Natural Character attributes for the whole of the coastal environment however, not just for areas ranked as having High or Very High Natural Character. The values of this wider environment need to be clear in the District Plan. I agree with the concern to the extent that there are values in addition to the key values included in Schedule 12 that need to be considered when assessing potential adverse effects on the coastal environment. Related to this submission:
- 50 GWRC seeks to change the title of Schedule 12 to 'Coastal Natural Character Areas' from the current 'High Natural Character Areas'. Their rationale for this is that activities need to be assessed for their effects on Natural Character across the Coastal Environment as a whole. I agree that the effects of an activity may extend across the wider Coastal Environment, however the purpose of the schedule is to highlight areas within the coastal environment that rank high or very high for the attributes assessed and are least modified by human activities; they are areas where natural systems and processes remain intact and dominate.
- 51 As a person with a long history of Resource Planning and Management it is my view that mapped information to guide management needs to provide a clear focus on what is to be managed, the particular attributes in the particular places. Terrestrial Area boundaries, while relevant to the assessment process, are not directly relevant to Resource Management. What is relevant is the clear depiction of areas within the landscape that have attributes requiring sensitive management. Such areas include not only those with High or Very High Natural Character but also Outstanding Landscapes and Features, Special Amenity Landscapes, Significant Natural Areas, and Ridgelines and Hilltops. The overlays capture these so they are able to be viewed in relation to one another across the coastal environment. This, at least to some extent, should address GWRC's concerns.

- 52 The Boffa Miskell Assessment of Coastal Natural Character covering the Wellington Region was completed in 2016<sup>6</sup>. The report identified nine 'Coastal Terrestrial Areas' within Wellington City. Of these only the Terawhiti Area was assessed as having a 'High' level of Natural Character overall. There were however a further five Coastal Terrestrial Areas which, although not assessed as having High Natural Character overall, did have specific (component scale) areas within them that ranked as having High Natural Character. I have read this report and in my opinion the assessment process and report findings are clear and evidence based. The assessment process reflects professional best practice and is consistent with the NZI Landscape Architects 'Landscape Assessment Guidelines'<sup>7</sup>
- 53 Schedule 12 includes a summary ranking for abiotic, biotic, and experiential values for areas within the coastal environment with 'High' or 'Very High' Natural Character. These areas are shown on the mapped overlay in the PDP.
- 54 Three Coastal Terrestrial Areas (Evans Bay, Wellington City, and the Western Harbour.) were assessed as having no areas of High or Very High Natural Character. The schedule as notified in the PDP does not provide a description of values for these more urbanised coastal areas of the city.
- 55 In my opinion the outcomes of the Boffa Miskell Assessment are difficult to grasp in isolation of the methodology that generated them. All areas of the coastal environment were assessed in accordance with Policy 13 of the NZCPS 2010. This then directed attention to areas where natural character values were concentrated. A ranking process was used to identify areas deemed to have High or Very High natural character values. Their report provides an overview of Abiotic, Biotic, and Experiential values for each of the nine Terrestrial Areas of the coast with

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<sup>6</sup> Boffa Miskell Limited 2016. Wellington and Hutt City Coastal Study: Natural Character Evaluation of the Wellington City and Hutt City Coastal Environment. Report prepared by Boffa Miskell Limited for Greater Wellington Regional Council, Wellington City Council and Hutt City Council.

<sup>7</sup> TeTangi a te Manu; Aotearoa New Zealand Landscape Assessment Guidelines; 2022

a table summarizing these values, and their rankings. For areas with High or Very High Natural Character (those shown on the overlay in the PDP) summary rankings and a brief description of the values is provided. It is these summaries that are currently included in the PDP as notified.

56 Schedule 12 is designed to focus attention on coastal environment values generally, and areas where these values rank sufficiently high to qualify them as outstanding. The schedule cannot provide all of the information an applicant for a resource consent might need. In my view the Boffa Miskell report provides the comprehensive overview needed to ensure that effects are assessed with a full appreciation of the extent of Natural Character across the coastal environment and its relative significance. The structure of the Boffa Miskell report and the methodology provide useful cues to an assessment of effects.

#### **Individual Submissions**

57 Barry Insull (32.24) recommended that "Sinclair Head/ Te Rimurapa" replace "Sinclair Head" in the PDP Schedule 12 to acknowledge the Maori name. This recommendation is accepted and I note that the joint place names, as suggested by Mr Insull, appear on the PDP maps.

58 John Tiley (142.31) and the Churton Park Residents Association (189.31) express the view that Ridges and Hilltops and Significant Amenity Landscapes should be afforded the same level of protection as areas in the Coastal Environment with High Natural Character. Both submitters request that the 18 ridgelines and hilltops (and Marshalls Ridge) be listed in either SCHED11 - Special Amenity Landscapes and/or SCHED12 - High Coastal Natural Character Areas. This request is not supported.

59 The PDP seeks to guide and constrain development in accordance with the values of the particular landscape. Some of the city's landscapes are wild and remote with a minimal cultural presence and are deemed to have a High Natural Character while others are highly developed and dominated by cultural structures and patterns. Between these two extremes the PDP provides for various degrees of development. While the Ridgelines and Hilltops and Special Amenity Landscape overlays



constrain development, some development can occur subject to conditions. Schedule 12 clearly differentiates areas where natural values and natural processes are predominant and where 'protection' is the appropriate planning objective. Ridgelines and Hilltops in the Coastal Environment are already identified and protected.

- 60 Terawhiti Farming Co Ltd (Terawhiti Station) (411.30, and 411.31) This submitter requests the removal of the High Natural Character overlay from the Terawhiti Hill property while accepting that views of the property from out on the water are of value and worthy of acknowledgement. Terawhiti Hill is in fact recognised as an 'Outstanding Natural Feature', within an 'Outstanding Natural Landscape'. Terawhiti Hill is further recognised as having significant 'Ridgelines and Hilltops'. The Terawhiti property is clearly recognised as one of Wellington City's most spectacular landscapes as assessed in accordance with a broad range of criteria. One of the many benefits of having a systematic Regional Assessment of Natural Character undertaken by a team of experts, and as one comprehensive exercise, is that judgements are made in a consistent manner across the landscape. This means that values are ascribed objectively and transparently and that differences in values and vulnerabilities from place to place are afforded credibility. The overlays on Terawhiti Station have been determined through a thorough and systematic process of analysis, and relative to other landscapes within the city, if not within the Wellington Region, the Terawhiti landscape is special with the Natural Character of the Coastal Environment ranked as Very High. My recommendation is that the overlay be retained.

## **OUTSTANDING NATURAL FEATURES AND LANDSCAPES CHAPTER**

### **Rezoning matters related to ONFL and SAL**

- 61 Thomas Brent Layton [164.1, 164.2, 164.5, 164.6, 164.8, and 164.8] seeks to remove the SAL overlay from 183, 241, 249 and 287 South Karori Road.

Response:

- 62 Mr Layton questions the visibility of the Ridges across the four properties of interest to him as well as the validity of the Special Amenity overlays across the properties of interest to him. The objective in having the Ridgelines and Hilltops overlay is to recognise and protect the quality and coherence of views across the ridges and hilltops of the City's landscape. Amenity of importance to residents and visitors is recognised in the Significant Amenity Overlay. This overlay captures the more intimate and immediate relationships people share with their environments. Development within the areas identified by Mr Layton must have regard not only to visual effects but also effects on Natural Science Values, Sensory Factors, and Shared and Recognised Values.
- 63 Development in the South Karori Road area tends to be on flatter areas along the valley floor or along lower hill slopes. Areas of high visibility tend to be steeper, more inaccessible, land to which access is difficult and currently limited. In my view 'visibility' is a minor constraint on development and can be addressed by the careful location of structures and good design; there are other constraints of far greater significance such as earthworks and the need to protect water quality in streams. In my view the Special Amenity Overlay as notified should be retained as notified.
- 64 Kilmarston Companies (290.73, 290.76, 290.77, and 290.78 [opposed by Andy Foster FS86.63, FS86.64, FS86.65 and supported by Orienteering Wellington FS32.2]) seeks to amend the schedule to remove Special Amenity Landscapes overlays from the submitter's land which is zoned Medium Density Residential Zone (16 Patna Street, 109A Awarua Street, and 76 Silverstream Road).

Response:

- 65 The properties are located on the lower slopes of the Mt Kaukau Special Amenity Landscape. Mt Kaukau is one of the most visible high points in the Wellington Landscape and a defining feature on the Outer Green Belt. The identified SAL extends along the skyline and down steep slopes to Ngio and Khandallah, providing containment for residential dwellings and views across recovering indigenous regrowth. This Special landscape

is ranked High for both its Sensory Values as well as its Shared and Recognised Values. Its Natural Science Values rank Medium-High. The land within which the submitters land is located forms an integral part of the identified landscape and to remove this land from the overlay would create an inconsistency in the boundary of the SAL which currently reflects the natural edge of development. I would also note that the area of naturally regenerating native forest is recognised as a Significant Natural Area. The vegetation cover performs an important role in ensuring soil stability and the regulation of water runoff. I recommend that the current overlay be retained as notified.

### **Rezoning matters related to ridgelines and hilltops**

66 As an introductory comment, I note that activities within the Ridges and Hilltops overlay must have regard to visual effects; within the Significant Amenity Landscapes overlay any effects on people's experience of and/or relationship to the landscape must also be considered. This is graphically illustrated on the 'Interactive Map'. Significant Amenity Areas are generally located on the boundaries of, or within, built areas. The more elevated, more visible, parts of Significant Amenity Areas may also be captured within the Ridges and Hilltops overlay. However the Ridges and Hilltops overlay extends beyond the more developed parts of the city and out to rural areas and the coast where their visibility is a defining feature in the unique character and quality of the city's landscapes. Ridges and Hilltops extend across the whole landscape, giving emphasis to a coherence across urban and rural areas of the city.

67 Thomas Brent Layton [164.1, 164.2, 164.5, 164.6, 164.8, and 164.8] seeks to remove the Ridgelines and Hilltops overlay from 183, 241, 249 and 287 South Karori Road. Mr Layton considers that the application of the overlay is inconsistent with the policy intention to preserve the visible ridgelines and hilltops being natural. The ridgelines on these properties are not visible or prominent and there are no hilltops.

Response:

68 Mr Layton questions the visibility of the Ridges across the four properties of interest to him. While not particularly visible from public roads and

surrounding dwellings the ridges are prominent when viewed from high ground in the wider area, including places such as Wrights Hill which is an important public viewing point. The objective in having the overlay is to recognise and protect the quality and coherence of views across the ridges and hilltops of the city. More local amenity of importance to residents and visitors is recognised by having the Significant Amenity Overlay.

69 Areas of high visibility tend to be across steeper, more inaccessible, land to which access is difficult and currently limited. In my view 'visibility' is a very minor constraint on any development; there are others of far greater significance such as earthworks and the protection of water quality in streams. I recommend that the Ridgelines and Hilltops overlay be retained as notified in the PDP.

70 Taranaki Whānui [389.81] (opposed by Enterprise Miramar Peninsula Inc [FS26.11], Buy Back the Bay [FS79.11, FS79.28, and FS79.47], Lance Lones [FS81.13], and Andy Foster [FS86.17]) seek that the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford is removed, specifically at the Section 1 SO 477035, Part Section 20 Watts Peninsula DIST.

Response:

71 Taranaki Whanau seek to have overlays removed from parts of Watts Peninsula, land associated with the prison site. In my opinion to do so would create an unacceptable inconsistency; the ridgeline is highly visible and part of the wider city landscape. Similarly, the area is a Significant Amenity Landscape, visually prominent from the coastal edge and up to the ridgeline. The area also has very high experiential and associative values. Adding weight to the significance and sensitivity of Watts Peninsula is the presence of areas of Significant Natural Vegetation and Heritage sites, both European and Maori. The area is zoned as Natural Open Space

72 The peninsula is not pristine. There are existing structures within the overlays and exotic vegetation covers much of the land; conifers are a

prominent feature. While the Zoning and overlays would constrain any development of land not controlled by the Crown or by the Wellington City Council, the current plan would allow development of an appropriate scale and density. In my opinion the current overlays should be retained as notified.

- 73 Parkvale Road Limited [298.4 and 298.5] (opposed by Forest and Bird [FS85.42] and Andy Foster [FS86.70 and FS86.71]) seek to remove the Ridgelines and Hilltops overlay within 200 Parkvale Road or if relief is not given, seek the amendment of the provisions relating to the Ridgelines and Hilltops overlay.

Response:

- 74 Parkvale Road Limited seek to have the Ridges and Hilltops overlay removed from their property or the provisions altered. In my opinion the inclusion of this property in the overlay is appropriate as the visibility of the landform makes it an integral part of the wider landscape and contributes to its coherence and special character. I would also note that much of the property is captured within the Special Amenity Landscapes overlay and there are Significant Natural Areas. The property is very visible both from within the immediate Parkvale Road area as well as from surrounding elevated land.
- 75 In my opinion the provisions are appropriate. In the Rural Zone the subdivision of land within the Ridgelines and Hilltops must ensure that:
- a. The integrity of the ridgeline is protected; and
  - b. The subdivision is designed to minimise the adverse effects of future use and development on the visual amenity and landscape values.
- 76 These requirements are consistent with those for the Rural Zone in general. Any development of the Parkvale property would tend to be on the easier lower slopes where visibility would be limited and could be managed; structures can be integrated into the landform and their impacts softened with planting.

**Date:** 26 March 2024

Clive Anstey

A handwritten signature in black ink, reading "Clive Anstey". The signature is written in a cursive style with a large initial 'C' and a distinct 'A'.