BEFORE THE INDEPENDENT HEARINGS PANEL
OF HUTT CITY COUNCIL

UNDER	the Resource Management Act 1991 ("**RMA**")
AND	
IN THE MATTER	of the Proposed Hutt City District Plan ("**Proposed Plan**")

STATEMENT OF EVIDENCE OF EMMA FRANCES MCRAE
ON BEHALF OF WASTE MANAGEMENT NZ LIMITED (HEARING STREAM EIGHT)

LANDSCAPE AND VISUAL EFFECTS

27 OCTOBER 2026

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1. EXECUTIVE SUMMARY

1.1 This statement of evidence addresses landscape and visual management matters relating to the proposed rezoning of 30 Benmore Crescent, Manor Park ("**Site**") from General Rural to General Industrial zone, with a Benmore Crescent Precinct, or to a Special Purpose Industrial zone in the Proposed Plan.

1.2 The Site is a highly modified area of land that has been substantially altered by consented earthworks and is physically separated from the wider rural environment by State Highway 2, the Wairarapa railway line and Te Awa Kairangi / Hutt River. Although zoned General Rural, its character is more accurately described as modified, open and undeveloped land rather than rural. It is located within a mixed-use landscape containing transport infrastructure, residential development, recreation areas and existing industrial activities. The Site is not within any identified outstanding natural feature or landscape. From a landscape and visual perspective, the Site does not exhibit characteristics that warrant retention of General Rural zoning and can accommodate industrial development under the provisions discussed in my evidence.

1.3 I accept that industrial development will change the appearance of the Site, which is currently open land. However, the Site can only be seen from a relatively limited area, because existing vegetation, road and rail embankments, stopbanks and the surrounding landform block or filter views. Views are generally intermittent, filtered, oblique or elevated, and Te Awa Kairangi / Hutt River, the Belmont Hills and the surrounding vegetated hills would remain the dominant landscape features. The ground level of the Site is currently screened from Mary Huse Grove by the railway embankment and its vegetation, although future buildings may be visible above it. The Wairarapa Line rail corridor provides further separation from those properties.

1.4 The most sensitive locations are therefore the adjoining Te Awa Kairangi / Hutt River corridor, Hutt River Trail, Dry Creek, and nearby residential properties at Mary Huse Grove. The General Industrial Zone provisions, together with the proposed site-specific provisions for the Site, as outlined below, provide an appropriate framework for managing effects at these locations through setbacks, landscaping, targeted planting, screening, control of building appearance, lighting management and enhancement of the Dry Creek corridor.

1.5 I support the recommendation in the Section 42A Report dated 12 October 2026 ("**Section 42A Report**") that the Site be rezoned General Industrial, together with the recommended Benmore Crescent Precinct, including the 10m building setback from all site boundaries and the requirement for resource consent for buildings exceeding 1,000m². I also support the proposed site-specific policy and standards, which will ensure that future development is integrated into its surroundings while protecting the ecological, recreational and amenity values of the adjoining river and residential environments. In my opinion, the proposed rezoning is appropriate from a landscape and visual perspective.

2. INTRODUCTION

2.1 My full name is Emma Frances McRae. I am a Senior Principal Landscape Architect with Boffa Miskell Ltd, a national firm of consulting landscape architects, planners, ecologists and urban designers. I have been employed by Boffa Miskell since 2018.

2.2 I hold a Bachelor of Design (Hons) in Landscape Architecture, and I am a Registered Member of the New Zealand Institute of Landscape Architects.

2.3 I have been a landscape architect for over 20 years, practising both in New Zealand and the United Kingdom, and have been based in Wellington for the last eight years, providing consultancy services for a wide range of clients around New Zealand, including local authorities, land developers, and the infrastructure and renewable energy sectors.

2.4 My experience includes practising landscape architecture in Cardiff, Wales, for over five years, during which time I became a Chartered Member of the United Kingdom's Landscape Institute.

2.5 I have been engaged by Waste Management NZ Limited ("**WM**") and Te Kārearea Ltd ("**TKL**") to assess landscape and visual effects relating to the proposed rezoning of the Site to General Industrial.

2.6 I have been involved in the project since 2022, as peer reviewer of the following reports in relation to the Site:

(a) Resource Recovery Park Proposal: Assessment of Landscape Effects. Prepared for Building Solutions dated 19 December 2022. (relates to Hutt City Council ("**HCC**") RM230019 – WM's resource recovery park).

(b) Te Rangihaeata Tenancy Development Assessment of Landscape Effects Prepared for Building Solutions Ltd, 19 January 2023. (submitted for HCC RM230018, which was approved on 27 January 2025).

(c) Landscape and Visual Effects Assessment Addendum to the December 2022 report, dated 31 March 2023, which reassesses the effects based on new building detail, landscape treatment and the potential for planting to screen the proposed development. (Update to HCC RM230019 – WM's resource recovery park (as notified)).

2.7 I was subsequently engaged by WM in June 2026 to provide landscape advice in relation to the resource consent application for the proposed resource recovery park at the Site, including responses to requests for further information, along with providing landscape advice in relation to this Proposed Plan hearing. The resource recovery park is subject to a separate consent process. Where I refer to it in this evidence, it is as relevant context illustrating the type of industrial activity the Site can accommodate, rather than as the basis for my assessment of the rezoning proposal.

2.8 In addition to this, Boffa Miskell Ltd ("**BML**") has also been involved with previous resource consents relating to the Site and has prepared a series of landscape plans in relation to these consents. These include:

(a) RM220258: Condition 12 requires a landscape plan of Dry Creek; BML "Dry Creek Planting Preparation, Implementation and Maintenance" dated 9 May 2023 was approved by HCC to satisfy Condition 12. This plan covers planting covering an area extending 10m outwards over both banks when measured from the centre of the Dry Creek channel. The objective of the planting plan is to enhance the natural character values of the riparian margin.

(b) RM230018: Condition 13 requires planting of Dry Creek and the site boundaries as per BML "Proposed Landscape Plan" (Map 3 Rev 0 dated 12 January 2023) ("**Proposed Landscape Plan**") and Condition 14 requires planting around the widened intersection as per BML BM210903, Revision E dated 17 June 2024.

2.9 Separate to the resource consent conditions and drawings, BML has prepared a planting plan relating to the walking path realignment and planting on Greater Wellington Regional Council ("**GWRC**") land, as agreed by the Applicant with GWRC.

2.10 I have visited the Site and the surrounding area on several occasions. My most recent visit to the Site was on 17 September 2026 and to the surrounding area was on 2 September 2026.

3. CODE OF CONDUCT

3.1 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I will continue to comply with it when giving oral evidence. Except where I state that I am relying on the evidence of another person, the issues addressed in this evidence are within my area of expertise, and I have not omitted material facts known to me that might alter or detract from my evidence.

4. SCOPE OF EVIDENCE

4.1 This statement of evidence will:

(a) describe the existing Site conditions and surrounding landscape relevant to landscape, visual, and character matters, including the receiving environment once consented works are given effect to;

(b) outline the landscape, visual, and character management measures for the Site under the proposed General Industrial Zone and the proposed site-specific provisions for the Site, and confirm the appropriateness of those provisions;

(c) respond to landscape, visual, and character management matters raised in the Section 42A Report;

(d) respond to landscape, visual, and character management related matters raised in submissions; and

(e) provide an overall conclusion on WM's and TKL's proposed rezoning of the Site from a landscape, visual, and character management perspective.

4.2 In preparing this evidence I confirm I have read the following documents:

(a) the Section 42A Report as relevant to landscape and visual effects;

(b) Boffa Miskell, Resource Recovery Park Proposal: Assessment of Landscape Effects, 19 December 2022, and the Addendum dated 31 March 2023;

(c) Boffa Miskell, Te Rangihaeata Tenancy Development: Assessment of Landscape Effects, 19 January 2023; and

(d) the statement of evidence of Ms Angela Goodwin (planning) on behalf of WM for Hearing Stream Eight dated 27 October 2026.

5. SITE CONTEXT

5.1 The Site is located at 30 Benmore Crescent, Manor Park, approximately 7 km north of central Lower Hutt. It occupies a wedge-shaped area of 13.21 ha and lies between State Highway 2 and the Wairarapa Line rail corridor, immediately adjoining Te Awa Kairangi / Hutt River corridor. The Site is situated at the western edge of the Hutt Valley floor, where the valley narrows between the steep Belmont Hills escarpment to the north-west and the Stokes Valley hills to the east.

5.2 The Site forms a discrete area of open land contained by major transport and natural landscape features. State Highway 2 and Hebden Crescent lie to the north-west, with the railway corridor forming the eastern edge, and the Te Awa Kairangi / Hutt River corridor adjoins the Site to the south. Dry Creek passes along the Site's north-western boundary before joining the river near its south-western corner. Although the Site is zoned General Rural, it is physically separated from any other areas of rural landscape within the Hutt Valley, instead forming part of a complex valley-floor environment characterised by a mixture of transport infrastructure, residential development, recreation areas, industrial activities, waterways and vegetated hillsides.

5.3 The Site is not located within any Outstanding Natural Features or Landscapes ("**ONFL**") or Special Amenity Landscapes ("**SAL**"). However, two nearby potential SALs were identified in a Hutt City Landscape Evaluation Draft Technical Assessment in 2016 for Hutt City Council.[1] These were a Te Awa Kairangi / Hutt River SAL bordering the Site to the south, and a Belmont Hills

[1] Boffa Miskell, Hutt City Landscape Evaluation: Draft Technical Assessment (prepared for Hutt City Council, 2016).

SAL rising beyond State Highway 2 to the north-west. None of the SAL (or ONFL) areas identified within that study is proposed to be adopted as part of the District Plan review process and I therefore do not consider them further in my evidence.

5.4 The Site has been substantially modified by earthworks to enable a relatively level development platform under earthworks consent HCC RM230018. It therefore largely comprises areas of hardfill, with areas of stored hardfill at the southern end, with remaining vegetation present along the Dry Creek boundary area along with some weedy areas in the southern corner of the Site and a retained shelterbelt along the eastern boundary with the railway line. Two areas within the northern part of the Site are currently occupied as a service and storage yard (see Figure 1 below).



Figure 1: Aerial view of site illustrating areas of hardstanding and remaining vegetation along Dry Creek corridor

5.5 In addition to this, the roading and servicing consent (RM230018, granted 27 January 2025) forms part of the receiving environment. This consent includes formed roads, services and infrastructure which will urbanise the character of the site. Condition 13 of this consent requires the planting of Dry Creek and the site boundaries, as per the Proposed Landscape Plan. Planting within this plan covers a total area of over 3.95 ha and includes planting proposed for screening and revegetation along the Hutt River Trail and railway corridor, and riparian and revegetation planting along Dry Creek which formed part of Condition 12 required under RM220258. Plan BM210903_SK10 attached as **Attachment 1** illustrates this combined proposed planting, along with the

areas of agreed planting to be undertaken within the Hutt River corridor for GWRC. This planting is yet to be implemented but can be considered to form a part of the future existing environment.

5.6 The section of Dry Creek within the Site is also modified, with altered stream-bank gradients, changes to natural overland flows, and two existing culverts and bridge crossings providing access across the creek. As illustrated by historic aerial photography, the creek no longer follows a natural flow path through the Site.

5.7 The vegetation along Dry Creek is generally dense but variable in quality. It is dominated in places by exotic and weed species, including blackberry, willows and eucalyptus, with areas of regenerating native vegetation such as māhoe, kawakawa, karamū, tarata, pūahou, harakeke and tī kōuka, particularly beyond the south-western Site boundary (see Figure 1 above).

6. THE SURROUNDING LANDSCAPE

6.1 The surrounding landscape contains a visibly diverse mixture of land uses. Transport infrastructure is prominent in the immediate setting. State Highway 2 follows the base of the Belmont Hills escarpment, with an interchange approximately 100m north-east of the Site entrance providing access to Manor Park and Haywards Hill. The Wairarapa Line Rail corridor lies immediately east of the Site, with Manor Park Station and its pedestrian overbridge approximately 400m north-east of the Site entrance and the Pomare rail bridge crossing the river to the east.

6.2 Te Awa Kairangi / Hutt River corridor immediately to the south and east supports flood-management, ecological and recreational functions, including the popular Hutt River Trail. The Manor Park Golf Course occupies a large area to the north-east and contributes to the open-space and vegetated character of the river corridor.

6.3 Residential development occurs at Manor Park to the north and east of the Site, including the houses along Mary Huse Grove, which are tightly contained between the Wairarapa Line Rail corridor embankment and the river stopbank. Pomare lies beyond the river to the south, while further residential development overlooking the Site occupies parts of the Stokes Valley hills approximately 400m to 700m to the east and south-east. These residential areas occur as pockets of development separated or enclosed by the river corridor, golf course, transport infrastructure and steep vegetated hillsides.

6.4 Industrial and infrastructure-related activities are also evident nearby. These include Belmont Quarry, Allied Concrete and a paving business along Hebden Crescent, the Haywards Substation on Haywards Hill Road, a large industrial building and yard on the opposite side of the river to the south-east, and yard-based buildings, storage and manoeuvring areas near the Site entrance from Benmore Crescent. Consequently, the surrounding landscape has a mixed-use character rather than a consistently rural or wholly natural character.

7. VISUAL CATCHMENT

7.1 The Site has a relatively contained visual catchment. Visibility is restricted by existing vegetation along Dry Creek and the river corridor, State Highway 2 and railway embankments, river stopbanks, and the surrounding rising landform. Close views are generally intermittent, filtered or oblique, rather than continuous and open. More open views are available only from elevated, distant locations in the Stokes Valley hills, where the Site forms a small part of a wide outlook.

7.2 The most immediate public views are available from sections of the Hutt River Trail on both sides of Te Awa Kairangi / Hutt River. Intermittent views toward the Site occur over an approximately 500m section of the trail, including areas between Taita Rock and the Pomare rail bridge and near Craigs Crossing, as well as from the Hutt River stopbank adjacent to High Street. Views are filtered by riverbank willows, other riparian vegetation, and local topography. In sections of the trail the Site is not visible at all, while more open views are available near and beneath the Pomare rail bridge and from portions of the trail closest to the Site.

7.3 Short-duration, oblique views are available from State Highway 2 and Hebden Crescent over a distance of approximately 500m. These views are generally experienced by vehicle travellers and are partly filtered in some locations by taller vegetation along Dry Creek. The Site is also visible from the Manor Park railway corridor and from the pedestrian overbridge at Manor Park Station.

7.4 From Mary Huse Grove, the ground level of the Site is screened, but views toward the Site are available from the intersection with Manor Park Road, the local play area and river connection path, and from nearby residential properties. The Wairarapa Line Rail corridor embankment, which is approximately 4m higher than the adjoining land, and its associated vegetation provide foreground containment, with views generally directed toward the

Belmont Hills beyond. The upper parts of future buildings may be visible above the embankment.

7.5 More distant and elevated views are available from parts of the Stokes Valley hills, particularly from residential properties and roads around Aldersgate Grove (approximately 600m to 690m away) and Whitechapel Grove (approximately 400m away). From these locations, the Site forms a relatively small and visually contained component of broad views across the Hutt Valley floor. Te Awa Kairangi / Hutt River, the Belmont Hills and associated skyline remain the dominant landscape features, with residential development, road and rail infrastructure, Belmont Quarry and the Haywards Substation also visible within the wider outlook. More limited or glimpsed views may be available from the Eastern Hutt Road area through intervening vegetation.

7.6 Views outward from the Site are framed by the Belmont Hills escarpment to the north-west, the Stokes Valley hills to the east and south-east, and the vegetation associated with Dry Creek and the river corridor. The road and rail corridors, overhead rail infrastructure, nearby residential development and other valley-floor activities are also evident. These outward views reinforce the Site's position within a contained, mixed-use valley setting rather than as part of an extensive rural landscape.

8. LANDSCAPE AND VISUAL MEASURES

8.1 Under the proposed General Industrial Zone, the planned urban environment is one that would meet the operational needs of industrial activities and research activities while still providing a safe, functional, and attractive environment for workers and visitors.

8.2 In terms of landscape and visual provisions proposed, Objective **GIZ-O4** (Planned character and planned urban built environment of the zone) requires the built character of the zone to balance industrial operational needs with the needs of employees and visitors, including by creating an environment that is healthy, safe, attractive, accessible, and integrated with surrounding neighbourhoods and infrastructure. **GIZ-O5** (Character – main through routes) further requires identified main through routes to be attractive and to assist the city's sense of place and identity, while **GIZ-O6** (Adverse effects) requires adverse effects to be effectively managed both within the zone and at interfaces with other zones.

8.3 Policy **GIZ-P10** (Urban design outcomes (other than industrial activities and research activities)) requires built development for activities other than

industrial and research activities that exceeds an identified scale threshold to be managed to achieve specified urban design outcomes, through an approach demonstrated in a resource consent. Those outcomes include **GIZ-P10.4**, which requires any on-site landscaping that is proposed, or required by **GIZ-S5** (Existing activities), to retain healthy and mature vegetation, use planting appropriate to the climate and environment within the site, and provide one or more of functional, aesthetic, stormwater-management, ecological or urban heat-mitigation benefits. **GIZ-P10.5** also requires public and communal outdoor spaces to be designed and landscaped to be comfortable for users in different climatic conditions.

8.4 In terms of visual management measures, under **GIZ-S1** (Height), buildings and structures must not exceed 22m in height. If this standard is breached, the matters of discretion include the relevant urban design outcomes in **GIZ-P9**, including the contribution of the building's form and scale to visual amenity in public space, sunlight and daylight effects, privacy, and effects on adjoining residential sites and public open space.

8.5 The 22m height standard recognises the scale anticipated in an industrial zone. At a zone-wide level, a building complying with that standard is not required to be visually recessive. In particular, **GIZ-P11(e)** (Urban design outcomes (exclusions)) states that the Proposed Plan does not seek to limit the height, scale, or density of development where the height, setback, site coverage, height-in-relation-to-boundary, and density standards are met. **GIZ-P11(f)** also states that modulation of building form or variation in building materials is not anticipated as mitigation solely to reduce perceived building scale where the relevant height, setback, and height-in-relation-to-boundary standards are met.

8.6 This means that, at a zone-wide level, visual management should primarily focus on site layout, sensitive boundaries, public frontages, entrances, circulation areas, and screening of operational activities. Architectural articulation may still be beneficial, particularly on prominent elevations, but would not necessarily be required solely to make a compliant industrial building appear smaller.

8.7 **GIZ-S2** (Height in relation to boundary - Adjoining zones) requires buildings and structures to comply with the height-in-relation-to-boundary standard of an adjoining Residential, Rural, Mixed Use, or Marae Zone. This manages the visual dominance, shading, daylight, and privacy effects of industrial buildings where they adjoin more sensitive zones.

8.8 **GIZ-S3** (Setbacks - Adjoining zones) requires buildings and structures to be set back at least 5m from boundaries adjoining a Residential, Rural, Mixed Use, Marae, or Open Space and Recreation Zone. Boundary fences no more than 2m high are exempt. The Section 42A Report recommends increasing this setback to 10m from all site boundaries within the Benmore Crescent Precinct. I address this further at paragraph 11.14 below.

8.9 **GIZ-S4** (Overlooking - Adjoining zones) requires opaque privacy glazing where a window overlooks an adjoining Residential, Rural, Mixed Use, Marae, or Open Space and Recreation Zone, the top of the window is more than 2m above ground level, and the window is within 10m of the boundary. This measure manages overlooking and privacy effects at sensitive interfaces without preventing industrial buildings from being located near those boundaries where the other bulk and location standards are met. The control is specifically directed at windows and privacy, rather than general views of the building or Site.

8.10 **GIZ-S5** (Landscaping and screening) requires landscaping on any boundary with an adjoining site in the Residential Zone, Rural Zone, Mixed Use Zone, Marae Zone, or Open Space and Recreation Zone, unless the site is screened with a solid or close-boarded fully opaque fence on the boundary of at least 1.8m in height above ground level. Landscaping must extend across the full site width except for vehicle crossings and walkways. It must include at least one tree per 15m of frontage or boundary, and those trees must have a minimum stem diameter of 40mm at the time of planting.

8.11 **GIZ-P12.1** (Managing adverse effects at zone interfaces) requires outdoor work, storage, loading, and parking areas to be screened from level view from Residential, Mixed Use, Rural, Special Purpose, and Open Space and Recreation Zones. This is the principal policy direction for managing the visibility of operational components of industrial development at zone interfaces. It is implemented by **GIZ-R23.1** (Outdoor storage and work areas), which permits outdoor storage and work areas only where they are screened from those adjoining zones by a building or a solid or close-boarded fully opaque fence at least 1.8m high.

8.12 For activities other than industrial and research activities that exceed the relevant scale threshold, **GIZ-P10.1** to **GIZ-P10.3** additionally seek visible and accessible building entrances, clearly designed and lit public and private spaces, avoidance of spaces with unclear functions, Crime Prevention Through Environmental Design measures, and safe and efficient pedestrian circulation. **GIZ-P10.6** requires development to display aesthetic value and

positively contribute to place and local identity, particularly at prominent corners and terminated vistas.

9. BESPOKE PROVISIONS IN RELATION TO 30 BENMORE CRESCENT

9.1 Further site-specific provisions are proposed in the submissions by TKL and WM for the Site.

9.2 Proposed **GIZ-PREC1-P1** is the principal site-specific policy. It requires activities at 30 Benmore Crescent to be managed by:

(a) maintaining values of Dry Creek and Te Awa Kairangi and their margins;

(b) maintaining and enhancing a predominantly vegetated corridor along Dry Creek;

(c) integrating buildings, structures, outdoor storage, work areas, loading areas and lighting into the site through building siting, recessive colours and comprehensive landscape treatment;

(d) managing effects at the interface with the recreational area adjoining Te Awa Kairangi and the residential area at Mary Huse Grove;

(e) managing the overall level of development to ensure the safe and efficient operation of the transport network; and

(f) maintaining access required for river management, flood protection and recreational functions within the Te Awa Kairangi corridor.

9.3 A new rule, **GIZ-PREC1-R4**, is proposed for resource recovery and waste management facilities (such as WM's proposed resource recovery park, or any similar future facility) with matters of discretion proposed in relation to:

(a) the visibility and screening of outdoor storage and waste handling;

(b) the adequacy, timing, establishment and long-term maintenance of landscape mitigation;

(c) firefighting and prevention measures;

(d) measures to manage dust and odour; and

(e) measures to manage pests and likely effects on the surrounding environment.

9.4 New standards are proposed in relation to the Site, including:

(a) proposed GIZ-PREC1-S1, additional landscaping requirements for the Site;

(b) proposed GIZ-PREC1-S2, building colour, signage and lighting requirements for the Site;

(c) proposed GIZ-PREC1-S3, requiring setbacks of at least 10m horizontally from the centreline of Dry Creek and from site boundaries; and

(d) proposed GIZ-PREC1-S4, requiring that the gross floor area of any building, other than a building associated with a resource recovery park, must not exceed 1,000m².

9.5 Proposed GIZ-PREC1-S1 would require a landscape plan, prepared by a suitably qualified landscape architect and certified by the Council, before construction of any new principal building at the Site. The plan standard is intended to establish a coordinated and enduring landscape framework for the Site, including a continuous buffer along the boundary with the Te Awa Kairangi recreational corridor, screening between buildings within 50m of that boundary and the Hutt River Trail, and screen planting along the eastern boundary with the railway corridor to mitigate public views from Mary Huse Grove. It would also establish a predominantly indigenous planted corridor along Dry Creek of at least 20m in total width (10m either side of the centreline) and require tall canopy species capable of screening or visually integrating principal buildings. The 20m Dry Creek corridor is consistent with the planting already required under the earthworks consent.

9.6 The plan must also show river-management access, paths, fences, bunds, batters, stormwater devices and services, together with establishment, maintenance and replacement measures to ensure the mitigation remains effective over time.

9.7 Proposed GIZ-PREC1-S2 would manage the visual prominence of development through controls on building colour, reflectivity, signage and external lighting. The exterior walls and roofs of principal buildings visible from Te Awa Kairangi recreational corridor or Mary Huse Grove would be required to use recessive brown, green or grey colours with a light reflectance value of

no more than 30 percent, except for minor architectural elements or where required for operational safety. Illuminated, digital and third-party advertising signs, and building-mounted signs over 2m², would not be permitted on façades facing or visible from these areas, although identification, health and safety, emergency and statutory signage would remain enabled. Lighting controls would require exterior lighting to be directed downwards and shielded to minimise light spill into the river corridor, Hutt River Trail and nearby residential properties. Overall, the intent is to visually integrate industrial development into its river-edge setting and protect the amenity of adjoining recreational and residential environments without preventing the Site's industrial use. Along with the proposed setbacks from Dry Creek and the site boundaries, and the restricted discretionary maximum building size, I consider these provisions as drafted to be appropriate to manage landscape and visual related interface effects.

10. RESPONSE TO THE SECTION 42A REPORT

10.1 The Section 42A Report recommends that the Site be rezoned from General Rural Zone to General Industrial Zone. The reporting officer supports the submissions by TKL and WM to that extent, finding that the Site is highly modified, physically separated from the District's main rural areas, has limited demonstrated rural productive value, and is well connected to strategic transport infrastructure.[2] The officer also considers that industrial zoning would contribute to the identified demand for business land and better give effect to the National Policy Statement on Urban Development.[3] The officer does not support the request by Te Rūnanga o Toa Rangatira for a Special Purpose Industrial Zone, considering that the General Industrial Zone, supplemented by a precinct, provides an adequate planning framework.[4] The adjoining railway corridor is also recommended to be rezoned from Medium Density Residential to General Industrial.[5]

10.2 The Section 42A Report recommends rejecting submissions by the Manor Park and Haywards Residents Community Incorporated Society ("**Residents**

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2 Section 42A Report at [242]. See also Statement of Evidence of Angela Goodwin (Hearing Stream Eight) dated 28 October 2026 at [1.4], [5.10], [5.12] and [6.6]-[6.8]; and Statement of Evidence of David Gibson (Hearing Stream Eight) dated 27 October 2026 at [5.3]-[5.6].

3 Section 42A Report at [242]. See also Statement of Evidence of Angela Goodwin at [1.3] and [5.33]-[5.35]; and Statement of Evidence of David Gibson at [7.18]-[7.19] and [11.3].

4 Section 42A Report at [157]-[158].

5 Section 42A Report, Appendix 2.

Society") and numerous individual submitters seeking retention of the General Rural Zone, alternative residential, mixed-use, light-industrial, open-space or split zoning, or the outright exclusion of industrial and waste-related activities.[6] It also recommends rejecting requests to make cleanfills, landfills and solid waste transfer stations non-complying within specified distances of residential zones.[7] While the officer acknowledges concerns regarding residential amenity and visual effects, he concludes that these matters can generally be managed through the General Industrial Zone provisions, the separation provided by the rail corridor, regional regulation and future resource consent processes.[8]

10.3 Overall, the Section 42A Report considers the General Industrial Zone to be the most appropriate zoning, subject to a Benmore Crescent Precinct containing additional site-specific controls. These include a 10m building setback from all site boundaries and restricted discretionary assessment of buildings exceeding 1,000m² gross floor area, which the officer accepts as additional mitigation responding to submissions seeking buffers between the zones. Further provision is anticipated for the protection and enhancement of Dry Creek and for stormwater management, which the officer accepts subject to further details being provided before the hearing.

10.4 I support these measures. Ms Goodwin addresses the provisions further in her evidence.[9]

11. RESPONSE TO SUBMISSIONS

11.1 The Section 42A Report records approximately 243 submission points from 141 submitters in relation to the Site, including approximately 134 submissions using a common template (referred to in the Section 42A Report as "Submitter Group A"). I have not reviewed every individual submission, and have focused on those raising landscape and visual matters, as summarised below.

11.2 Several submissions support the retention or application of General Rural zoning at the Site.[10] Their reasons include protecting rural and natural character, avoiding incompatible industrial and waste management activities near the Manor Park residential community, and managing effects including

6 Section 42A Report at [246].
7 Section 42A Report at [250].
8 Section 42A Report at [244].
9 Statement of Evidence of Angela Goodwin at [4.2], [5.4] and [5.20]-[5.22], and Attachment 1. See also Statement of Evidence of David Gibson at [10.2] and [11.3].
10 For example, submissions PDP/201 and PDP/377.

noise, vibration, dust, odour, traffic, vegetation loss, stream modification and visual change. Other submissions support the environmental and amenity outcomes associated with rural zoning, although their relief is more accurately characterised as opposition to industrial and waste development than as a request to retain the General Rural Zone.[11]

11.3 Other submissions do not expressly support or oppose the General Rural Zone, but consider that a resource recovery or waste transfer activity at the Site would conflict with its rural setting, adversely affect the character and amenity of the nearby Manor Park residential community, and create an inappropriate interface between industrial and residential activities. The recurring landscape matters raised by submitters are:

(a) perceived inconsistency of the resource recovery park with the General Rural Zone;

(b) the Site being considered more suitable for residential, commercial, mixed-use or light industrial activities;

(c) waste transfer development being considered unsuitable for the character of the area;

(d) the Proposed Plan provisions being considered insufficient to manage the use, development and protection of the Site;

(e) loss of rural character; and

(f) proximity to residential areas and incompatibility of activities.

11.4 Each of these matters is summarised and responded to below.

Perceived inconsistency of the resource recovery park with the General Rural Zone

11.5 Several submitters consider that a waste transfer station or resource recovery park is an industrial-type activity inconsistent with the purpose, character and anticipated environmental outcomes of the General Rural Zone.[12] The principal landscape concern is that enabling such an activity will replace an open or "rural" setting with an industrial landscape and undermine the natural character and ecological qualities expected in the General Rural Zone.

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11 Submissions PDP/036, PDP/223 and PDP/250.

12 For example, submissions PDP/036, PDP/045, PDP/201, PDP/223, PDP/250, PDP/353, PDP/377, PDP/382 and PDP/389.

11.6 A particular comment from a submitter on this matter notes that "Rural zones, by their very nature, are intended to preserve the natural environment and protect the rural character of the land." And that "Industrial activities like land transfer stations should be confined to areas specifically zoned for industrial use."[13] The Residents Society states that "Cleanfills, landfills and waste transfer stations are not compatible with nearby established residential activities."[14]

11.7 Submitters are correct that a resource recovery park or waste-transfer activity is industrial in character and would not maintain the Site as open, undeveloped land. The same is true of industrial activities generally, and my assessment is not confined to that particular proposal. However, this does not provide a landscape basis for retaining the General Rural Zone. The Site is physically separated from other rural land by State Highway 2, the Wairarapa Line Rail corridor, Te Awa Kairangi / Hutt River and surrounding urban and infrastructure-related activities. It is not currently used for rural production and does not form part of a wider coherent rural landscape. Its present character is more accurately described as modified and undeveloped or open land within a mixed-use valley-floor environment.

11.8 The Site is also outside any identified ONFL. The key landscape issue is therefore not whether the Site should remain visually or physically rural, but whether industrial development can be appropriately integrated into the receiving environment and whether effects on the adjoining river corridor, recreational areas and residential community can be adequately managed.

11.9 The proposed General Industrial Zone responds to the industrial nature of the anticipated activities more directly than the General Rural Zone. At a zone-wide level, **GIZ-O4** seeks an industrial environment that is healthy, safe, attractive and accessible, has good access to surrounding neighbourhoods, and is integrated with existing and planned infrastructure. **GIZ-O6** requires adverse effects to be effectively managed within the zone and at interfaces with other zones. These objectives recognise that industrial development will alter the Site's current open appearance, while requiring the resulting environment and its external effects to be appropriately managed.

11.10 Proposed policy **GIZ-PREC1-P1** is a bespoke policy for the Site. Among other things, it requires activities at the Site to be managed by protecting the ecological and amenity values of Dry Creek and Te Awa Kairangi, maintaining

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13 Submission PDP/036.

14 Submission PDP/377.

a predominantly vegetated corridor along Dry Creek, integrating buildings and operational areas through siting, recessive colours and landscape treatment, and managing effects at the interfaces with the adjoining recreational area and Mary Huse Grove. **GIZ-PREC1-P2** also recognises the Site's importance for industrial activities requiring substantial areas of land, including resource recovery and waste management facilities.

Site considered more suitable for residential, commercial, mixed-use or light-industrial activities

11.11 Several submitters accept that some development of the Site may be appropriate, but favour activities that are more compatible with Manor Park's perceived residential character.[15] Suggested alternatives include residential development, mixed use, light commercial or light industrial activities, rural-lifestyle development, recreation and open space. The common landscape rationale is that these uses would better adjoin the established community. The Residents Society states that the alternative zone should contemplate "a mix of open space, rural-lifestyle, residential, and commercial mixed-use activities."[16]

11.12 From a landscape and visual perspective, use of the Site for residential, mixed-use, commercial, rural-lifestyle, recreation or light industrial activities may produce different built forms and patterns of use, but would not necessarily retain the Site's existing openness or result in fewer effects. Residential or mixed-use development could introduce a fine-grained pattern of buildings, roads, fences, domestic lighting and vegetation throughout the Site.

11.13 The Site's contained visual catchment is relevant to the appropriateness of industrial zoning. Existing vegetation, railway and road embankments, stopbanks and surrounding landform limit visibility. Views from State Highway 2 and Hebden Crescent are generally short-duration and oblique, while the Site forms a small component of wider elevated views from the Stokes Valley hills. The most sensitive views are from parts of the Hutt River Trail, where views are intermittent and filtered but occur at closer range and are experienced by slower-moving recreational users.

11.14 The proposed provisions for the General Industrial Zone aim to regulate the external effects of industrial development. **GIZ-S1** applies a maximum building height of 22m. **GIZ-S2** applies height-in-relation-to-boundary controls where

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15 For example, submissions PDP/045, PDP/063, PDP/075, PDP/353, PDP/377, PDP/382 and PDP/389.

16 Submission PDP/377.

the Site adjoins specified sensitive zones, while **GIZ-S3** requires a minimum 5m building setback from boundaries adjoining Residential, Rural, Mixed Use, Marae, or Open Space and Recreation Zones. The Section 42A Report recommends that this be increased to 10m from any site boundary within the Benmore Crescent Precinct, which I support. **GIZ-S4** manages overlooking by requiring opaque privacy glazing in specified circumstances.

11.15 In addition, the industrial zone incorporates landscaping provisions to address potential effects on neighbouring zones. **GIZ-S5** requires a 3m landscaped buffer along specified sensitive-zone boundaries unless the boundary is screened by a solid or close-boarded fully opaque fence at least 1.8m high. Where landscaping is provided, it must extend across the relevant boundary, except where access is required, and include at least one tree per 15m, with a minimum stem diameter of 40mm at planting and capable of reaching at least 5m at maturity. **GIZ-P12.1** and **GIZ-R23.1** require screening of outdoor work, storage, loading and parking areas from adjoining sensitive zones. These provisions directly address the aspects of industrial activity most likely to appear visually untidy or incongruous when viewed from residential or recreational areas.

Waste transfer development considered unsuitable for the character of the area

11.16 Some submitters describe Manor Park as a quiet, established residential community with a rural or semi-rural setting, proximity to the river, recreational trails, the golf course and regional open-space features.[17] They consider a waste transfer facility to have an industrial character that would be incongruous with these attributes. Noise, dust, vibration, odour, heavy vehicles, vegetation removal and large-scale operational areas are repeatedly identified as factors affecting character and amenity.

11.17 A particular comment from a submitter on this matter states that "Implementing a waste transfer park is not ideally suited to the characteristic of this beautiful community."[18]

11.18 As described in Section 6, the character of the surrounding landscape is of mixed use. Natural features in the surrounding landscape include Te Awa Kairangi / Hutt River, Manor Park Golf Course and surrounding vegetated hills. Those features contribute positively to the wider setting and are relevant to the

17 Submissions PDP/036, PDP/045, PDP/057, PDP/075, PDP/165, PDP/201, PDP/221, PDP/223, PDP/250, PDP/356, PDP/377, PDP/382 and PDP/389.

18 Submission PDP/075.

sensitivity of the receiving environment. However, the surrounding area is not consistently rural or natural. It also contains State Highway 2, the Wairarapa railway line and overhead rail infrastructure, Belmont Quarry, Allied Concrete, other yard-based activities, the Haywards Substation and existing residential development.

11.19 The proposed provisions address character effects by concentrating management on the Site's external interfaces and the visibility of operational activities. The general provisions are proposed to be supplemented by **GIZ-PREC1-P1**, which specifically identifies the Te Awa Kairangi recreational interface and Mary Huse Grove as locations where effects must be managed. This provides an appropriate policy basis for locating visually intensive activities away from those interfaces, using buildings to screen service and storage areas, and providing planting where industrial buildings and operations may otherwise appear prominent.

11.20 Proposed **GIZ-PREC1-S1**, described at paragraph 9.5, would require a certified landscape plan establishing a landscape framework for the Site. This includes a continuous buffer along the Te Awa Kairangi recreational corridor, screening between buildings and the Hutt River Trail, targeted planting to mitigate views from Mary Huse Grove, and a predominantly indigenous planted corridor at least 20m wide along Dry Creek, together with establishment and maintenance requirements.

11.21 Proposed **GIZ-PREC1-S2**, described at paragraph 9.7, would control building colour, reflectivity, signage and external lighting at the Site.

11.22 The submitters also refer to noise, dust, odour, vibration and heavy-vehicle effects. These matters contribute to people's overall perception of an area, but their technical assessment is outside the scope of landscape expertise. They are more appropriately managed through the relevant noise, transport, air-quality, operational and management-plan provisions, and, for the resource recovery park, through its separate consent process. From a landscape and visual perspective, the relevant issues are the appearance of buildings and operational areas, visibility of vehicle and waste-handling activities, lighting, and the quality of the Site's edges, whether associated with the resource recovery park or other industrial activities. Those matters are addressed in principle by the proposed General Industrial Zone provisions, with the site-specific standards above addressing potential effects at the Site.

Proposed Plan provisions considered insufficient to manage use, development and protection of the Site

11.23 A large number of submitters, including the approximately 134 Submitter Group A submissions identified in the Section 42A Report, use the same wording to contend that the Proposed Plan lacks appropriate objectives, policies, rules or methods to manage development at the Site.[19] They seek stronger provisions to avoid adverse effects on the natural environment and the existing Manor Park community. The Residents Society provides the most detailed requested amendments, including a strategic objective protecting residential communities, compatibility policies, stronger waste-activity classifications, and revised noise and vibration provisions.[20]

11.24 The submitters state that "The PDP does not include the most appropriate objectives, policies and rules / methods to manage the use, development, and protection of natural and physical resources."[21] And that development should occur in a way that "avoids adverse effects on the natural environment and the existing residential Manor Park community."[22]

11.25 The Residents Society further states that "The strategic objectives do not provide a specific outcome about ensuring existing residential areas are protected from incompatible activities nearby."[23]

11.26 In my opinion, the zone-wide General Industrial Zone provisions provide a generally appropriate framework for the development of the Site, through the 22m height limit, sensitive-boundary setbacks, height-in-relation-to-boundary controls, privacy glazing, boundary landscaping and requirements for screening of outdoor work and storage areas. These controls respond to building scale, visual dominance, overlooking and the appearance of operational areas.

11.27 The bespoke provisions proposed by TKL and WM will strengthen this framework. In particular, **GIZ-PREC1-P1** identifies Dry Creek, Te Awa Kairangi, the adjoining recreational area and Mary Huse Grove as specific receiving environments requiring management. Proposed **GIZ-PREC1-S1** would introduce additional site-specific landscaping requirements, proposed

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19 For example, submissions PDP/036, PDP/057, PDP/063, PDP/075, PDP/078, PDP/165, PDP/201, PDP/223, PDP/250, PDP/356, PDP/377, PDP/382 and PDP/389.

20 Submission PDP/377.

21 Submission PDP/057.

22 Submission PDP/223.

23 Submission PDP/377.

GIZ-PREC1-S2 would control building colour, signage and lighting, the proposed Dry Creek setback would keep buildings and operational areas at least 10m from the creek centreline, and the proposed building size standard would manage building scale at the Site. Non-compliance with GIZ-PREC1-S1 or GIZ-PREC1-S2 is proposed to require consent as a discretionary activity, allowing the landscape and visual effects of non-compliance to be considered.

11.28 These provisions respond directly to submitters' concern that the standard General Industrial Zone framework does not sufficiently recognise the Site's context. They establish a bespoke landscape planning response rather than treating the Site in the same way as industrial land that does not adjoin a major river and recreational corridor or sit close to an established residential area.

Loss of rural character

11.29 Several submitters are concerned that industrial development would erode the rural or semi-rural qualities of the Site and wider Manor Park setting.[24] The cited values include openness, peacefulness, vegetation, wildlife, streams, the relationship with Te Awa Kairangi, the golf sanctuary and the absence of intensive industrial activity. Existing earthworks and tree removal are also described as having already changed the Site. As an example of some submissions, one submitter states that industrial zoning "eliminates the rural character";[25] another submitter states that rural zones "protect the rural character of the land";[26] and two submitters oppose the rezoning due to "impacts on rural character of community and wildlife restoration efforts".[27]

11.30 I agree that industrial rezoning and development would change the Site from modified open land to a developed industrial environment. It is therefore not suggested that the existing open character of the Site would be retained. The relevant issue is the importance of that change at the Site and wider landscape scale, and whether the important characteristics of the receiving environment would remain legible and dominant.

11.31 The Site does not form part of an extensive rural landscape. It is separated from other rural land, is not presently used for rural activities and has already been substantially modified by consented earthworks. Its physical context is defined by the highway, railway, river corridor, residential development,

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24 For example, submissions PDP/036, PDP/201, PDP/223, PDP/250, PDP/377, PDP/382 and PDP/389.

25 Submission PDP/292.

26 Submission PDP/036.

27 Submissions PDP/382 and PDP/389.

recreational land and infrastructure-related activities. The Site's existing openness contributes to local views, but openness alone does not establish a coherent rural character or provide a landscape reason for retaining General Rural zoning. The proposed provisions do not purport to avoid the change in Site character. Instead, they seek to contain and integrate that change.

Proximity to residential areas and incompatibility of activities

11.32 Proximity of the Site to a residential area is one of the most consistently raised matters. Submitters consider that lighting, traffic and the industrial appearance of the development would create an incompatible interface with the established residential activity. The Residents Society (PDP/377.2) seeks a strategic objective in UDSD-O2 protecting existing residential communities from incompatible land use, stating that "it is appropriate, in some locations such as Manor Park, for residential character to be protected from nearby land uses".

11.33 The Proposed Plan does not seek to prohibit certain land uses from operating in adjacent zones. Rather, it provides controls to ensure that effects at interfaces between different zones are suitably managed.

11.34 Physical proximity of a residential zone to an industrial zone does not necessarily result in unacceptable landscape or visual effects. The degree of effect depends on visibility, separation, intervening landform and vegetation, the orientation and scale of buildings, the location of operational areas, and the effectiveness of screening and landscape mitigation.

11.35 The ground level of the Site is screened from Mary Huse Grove. Views towards it are available from the intersection with Manor Park Road, the local play area and river connection, and some residential properties, and the upper parts of future buildings may be visible above the railway embankment. The railway embankment and associated vegetation provide foreground containment, and the Site is seen within a wider outlook that includes the Belmont Hills and transport infrastructure.

11.36 The zone-wide provisions respond to this residential interface through **GIZ-S2**, which applies height-in-relation-to-boundary controls at specified sensitive boundaries; **GIZ-S3**, which requires a 5m building setback (this is proposed to increase to 10m from any site boundary within the Benmore Crescent Precinct); **GIZ-S4**, which manages overlooking; and **GIZ-S5**, which requires landscaping or an opaque boundary fence. **GIZ-P12.1** and **GIZ-R23.1** also require outdoor work, storage, loading and parking areas to be screened from adjoining sensitive zones.

11.37 The bespoke **GIZ-PREC1-P1** goes further by expressly requiring effects at the interface with the residential area at Mary Huse Grove to be managed. Proposed **GIZ-PREC1-S1** can give practical effect to that policy through screen planting along the eastern Site boundary with the railway corridor, including tall canopy species capable of screening or visually integrating principal buildings, on bunds or batters. Proposed **GIZ-PREC1-S4** can provide a resource consent threshold for larger buildings, allowing their scale, location and appearance to be assessed in relation to relevant viewpoints.

12. CONCLUSION

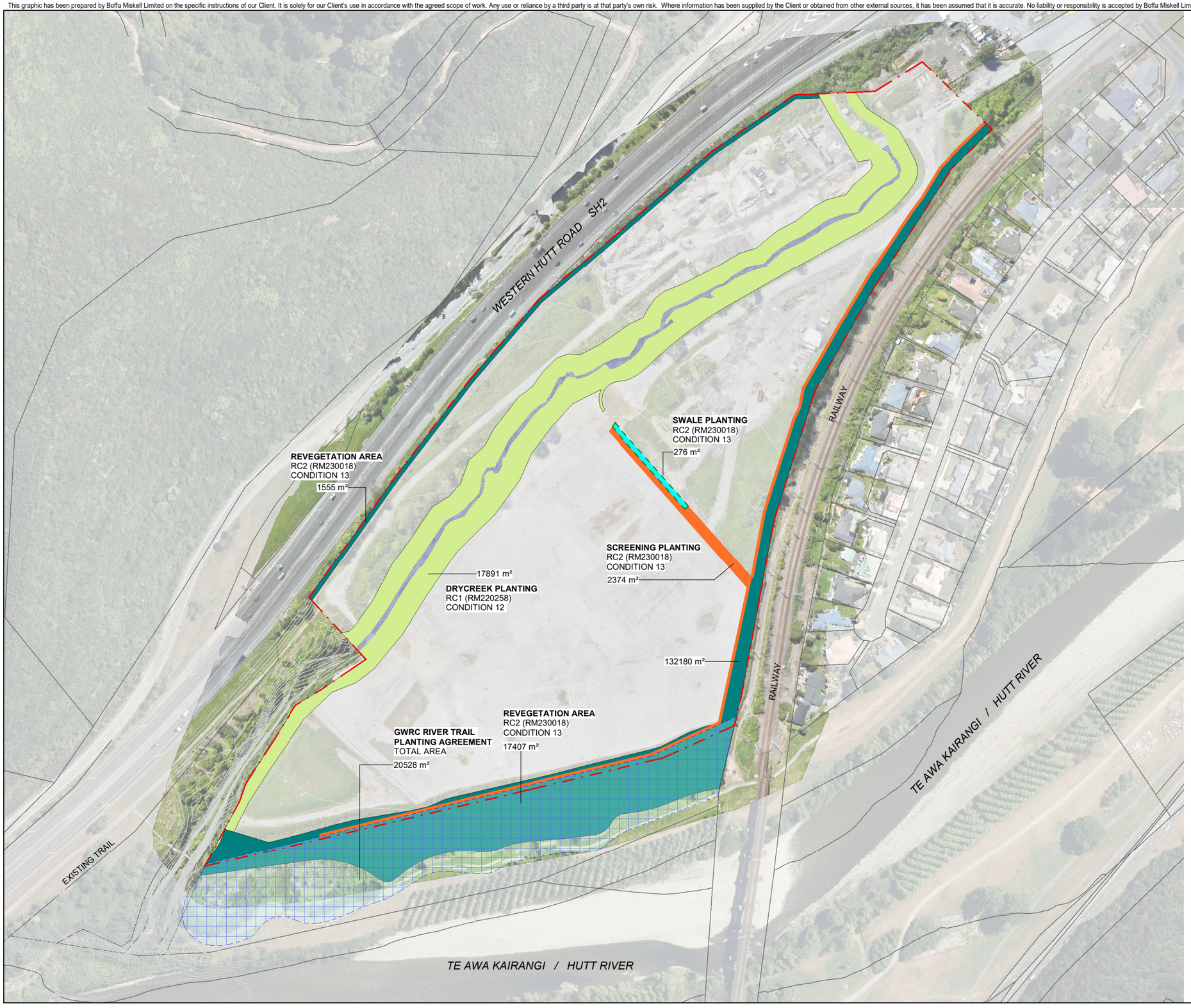
12.1 In my opinion, the proposed rezoning of the Site from General Rural Zone to General Industrial Zone is appropriate from a landscape and visual perspective. That conclusion does not depend on the resource recovery park proceeding; it relates to industrial use of the Site more generally. While industrial development will change the Site from its current open appearance, the Site is already highly modified, physically separated from other rural land, and forms part of a wider mixed-use valley-floor environment influenced by transport infrastructure, residential development, recreation areas and existing industrial activities. The Site does not make a significant contribution to a broader rural landscape, nor is it located within an identified outstanding natural landscape or feature.

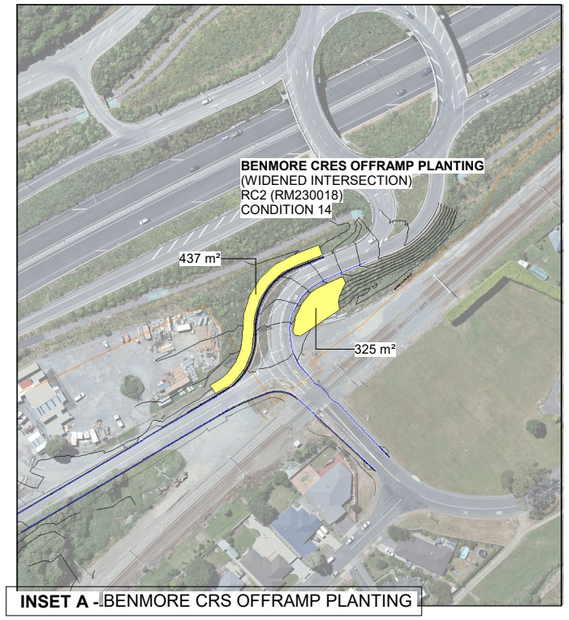
12.2 The key landscape and visual matters arising from future industrial development relate to effects on Te Awa Kairangi / Hutt River corridor, the Hutt River Trail, Dry Creek and the nearby residential community at Mary Huse Grove. In my view, these matters can be appropriately managed through the combination of the General Industrial Zone provisions and the proposed site-specific provisions for the Site. In particular, the proposed policy and standards relating to landscape treatment, protection and enhancement of Dry Creek, screening of development, building appearance, lighting and management of sensitive interfaces provide a robust framework for integrating future development into its surroundings.

Emma Frances McRae
27 October 2026

ATTACHMENT 1

This graphic has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use in accordance with the agreed scope of work. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.





INSET A - BENMORE CRS OFFRAMP PLANTING

RC1 (RM220258) - CONDITION 12		Area m² (Total)
	DRYCREEK PLANTING	**17891 m²**
RC2 (RM230018) - CONDITION 13		
	SWALE PLANTING	**276 m²**
	SCREENING PLANTING	**2374 m²**
	REVEGETATION PLANTING	**18962 m²**
RC2 (RM230018) - CONDITION 14		
	BENMORE CRES OFFRAMP PLANTING (WIDENED INTERSECTION)	**762 m²**
GWRC PLANTING AGREEMENT		
	RIVER TRAIL PLANTING **NOTE:** *AREA OVERLAPPING WITH REVEGETATION PLANTING AT SOUTHERN SIDE OF THE SITE*	**20528 m²**
	PROPERTY LINE	

0 m 14 m 28 m 56 m

ORIGINAL IN COLOUR

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NOTES

CONTRACTORS TO VERIFY ALL DIMENSIONS ON SITE PRIOR TO COMMENCING WORK;

CONTRACTORS ARE RESPONSIBLE FOR CONFIRMING THE LOCATION OF ALL UNDERGROUND SERVICES ON SITE PRIOR TO COMMENCING WORK;

FIGURED DIMENSIONS TO BE TAKEN IN PREFERENCE TO SCALED DIMENSIONS.

REV	DATE	DESCRIPTION	APr

CLIENT

CONSULTANTS

FOR INFORMATION

Te Karearea
Business Park

Overall PlantingTreatment Plan

Design	BML	Scale	Date
Drawn	SSr	1:1400 @ A1	23.10.2026
Check	EMc	1:2800 @ A3	

DRAWING NO. BM210903_SK10

REVISION

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