

Appendix 8: Joint Witness Statement – FHH (Landscape)

**Before a Hearings Panel appointed
by the Selwyn District Council**

Under

the Resource Management Act
1991

And

In the Matter

of a submission (DPR-0097) on the
Proposed Selwyn District Plan by
Flock Hill Holdings seeking rezoning
of 10128 West Coast Road, Lake
Pearson, Selwyn District

Joint Witness Statement (Landscape)

Dated: 11 April 2023

INTRODUCTION

1. In accordance with the directions of the Chair of the Hearings Panel made by email on 27 March 2023 expert witness conferencing on landscape matters took place via Teams and in person at the Boffa Miskell Christchurch office on 6 April 2023.
2. While there is a significant degree of alignment between experts for Selwyn District Council (**Council**) and Flock Hill Holdings (**Flock Hill**), the Section 42A Report for Topic 30.9 raised some relatively minor points of difference and requested some further information.
3. Given this, Flock Hill and the Council agreed that it would be valuable and efficient for the relevant experts to work through any remaining points of difference prior to the hearing on 20 April 2023.
4. The following expert witnesses attended the conferencing session (together the **Experts**) and have jointly prepared this Joint Witness Statement (**JWS**):
 - (a) Paul Smith on behalf of Flock Hill;
 - (b) Elizabeth Stewart on behalf of Flock Hill;
 - (c) James Bentley on behalf of Council; and
 - (d) Jon Trewin on behalf of Council.
5. The Witnesses confirm that the session has been conducted in accordance with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and this JWS has been prepared in accordance with Appendix 3 to that document.

Issues Discussed

6. The focus of the landscape conference was on:
 - (a) an appropriate site coverage threshold; and
 - (b) controls on helicopter movements.

THE ISSUES

Summary of Matters Agreed

7. Agreement was sought on all matters concerning the Site Coverage Threshold and Helicopter Movements.

Site Coverage Threshold

8. The principal issue outlined within the evidence of Mr. James Bentley concerned the easternmost part of the FHSVZ (referred to as Area 3). This is the only part of the proposed zone that is yet to be developed.
9. In response to this, Mr. Paul Smith in his rebuttal evidence recommended a maximum 8,000m² site coverage for the FHSVZ, as opposed to the 5% site coverage as proposed within the s42A report. Mr. Smith preferred to use the m² measurement rather than the % form of measurement. Mr. Bentley agreed with this proposition, as it enabled the building footprints to be easily calculated.
10. Mr. Smith also commented that a 5% site coverage on this zone would enable a considerably greater level of built form to occur and recommended a reduced building footprint of 8,000m² as this would be the maximum that the proposed zone could absorb. Both Mr. Smith and Mr. Bentley agreed that the 8,000m² site coverage would be a better landscape outcome considering that the zone forms part of the broader Outstanding Natural Landscape.
11. To further 'test' the 8,000m² site coverage limit, Mr. Smith prepared a series of calculations of the built forms in each area (Area 1, Area 2, Area 3, Area 4 and the Homestead Area), to ascertain the relative density of built forms over open space. Within all areas, the density appeared low, with Area 2 reaching 2,215m² (or 5.66% of Area 2). If all future built form were within Area 3, it would receive 3,035m² (which would include the relocated spa building), resulting in a building coverage of 5.61%. Mr. Bentley supported this.
12. Mr. Bentley raised the issue of spatial arrangement/ distribution of built form in Area 3, noting that site coverage and building size alone could result in buildings being 'clustered' for example in one part of Area 3. Mr. Bentley was concerned that this would be at odds with the existing Master Plan.
13. To rectify this, some amendments to the provisions were suggested and agreed upon by Mr. Bentley and Mr. Smith. These changes included additional wording for Policy 4 and Rule Requirement 5 and are highlight and underlined below:

14. FHSVZ P4:

'Development shall protect the landscape character and visual amenity values of the surrounding outstanding natural landscape by controlling the colour, scale, density, building coverage and spatial distribution, design and height of buildings and structures, associated infrastructure, vegetation and landscape elements'.

15. And FHSVZ – REQ5

'1. Buildings shall complement existing buildings in terms of building materials, texture, colour, finish, reflectivity and spatial distribution'.

16. It was agreed by all that these minor amendments to the FHSVZ would satisfy the landscape density and site coverage concerns originally held by Mr. Bentley.

Proposed Controls on Helicopter Movements

17. Discussion was held around what constitutes a helicopter movement. It was confirmed that one helicopter leaving the FHSVZ would constitute one helicopter movement, and its return would constitute one further helicopter movement. A cap on four helicopter movements per day was considered appropriate by all, as it was noted that this was in accordance with the GRUZ provisions.

18. A weekly cap of up to 20 helicopter movements was also agreed upon, noting that the FHSVZ forms part of the broader Outstanding Natural Landscape.

19. Based on this, there was agreement with provision FHSVZ-R11 as outlined within the evidence of Ms. Elizabeth Stewart.

20. **Summary of Matters Disagreed**

21. No matters were noted of disagreement.



Paul Smith



Elizabeth Stewart

A handwritten signature in black ink, appearing to read "JBentley", with a horizontal line extending from the end of the signature.

James Bentley

A handwritten signature in blue ink, appearing to read "Jon Trewin", with a horizontal line extending from the end of the signature.

Jon Trewin