

**BEFORE THE HEARING PANEL**

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

**AND**

**IN THE MATTER** of Proposed District Review  
Plan for Lower Hutt

**& IN THE MATTER** of Hearing Stream 4 (HS4)  
Special Purpose Quarry Zone.

**SUBMITTER** Winstone Aggregates

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**STATEMENT OF LANDSCAPE REBUTTAL EVIDENCE OF DAVID COMPTON-  
MOEN ON BEHALF OF WINSTONE AGGREGATES**

**DATED: 17 July 2026**

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## **1. INTRODUCTION**

- 1.1. My name is David Compton-Moen. I am a Director of DCM Urban Design Limited. I am a Registered Landscape Architect and Urban Designer
- 1.2. My qualifications and experience are set out in my statement of landscape evidence dated 3 July 2026. I have approximately 25 years of experience in landscape architecture, urban design and planning in New Zealand and internationally.
- 1.3. This rebuttal evidence responds to the landscape and visual evidence of Ms Rose Armstrong for Hutt City Council, dated 14 July 2026, and to the related conclusions and recommendations in the rebuttal evidence of Mr Sean Bellamy, dated 15 July 2026.

## **2. SCOPE OF REBUTTAL EVIDENCE**

- 2.1. In preparing this rebuttal evidence I have reviewed my original evidence and appended Visual Amenity Assessment, Ms Armstrong's evidence, Mr Bellamy's rebuttal evidence, the section 42A report for the Quarry Zone, the proposed QUARZ provisions, and the 10-metre landscape strip illustrations dated 1 July 2026.
- 2.2. My rebuttal evidence addresses the following landscape matters:
  - the areas in which Ms Armstrong and I agree;
  - the existing receiving environment and the role of Area 3 within the wider landscape;
  - natural character under section 6(a) of the RMA and outstanding natural features and landscapes under section 6(b);
  - the visual catchment and the magnitude of landscape and visual effects;
  - the intended form and management of the 10-metre retained landscape strip; and
  - refined controls for new quarry structures, including recessive colours and an objective reduced-level limit to avoid skyline breach.

## **3. EXECUTIVE SUMMARY**

- 3.1. My principal conclusions are:
  - a. I agree with Ms Armstrong that Te Awa Kairangi / Hutt River and its recreational corridor are relevant landscape considerations, and that Area 3 presently provides some local screening and green edge, and that skyline

protection is appropriate.

- b. I do not agree that Area 3 has been demonstrated to be an outstanding natural feature or landscape (ONL), or that it is a defining or indispensable component of an outstanding natural landscape. The Quarry Amenity Protection Overlay is an amenity and vegetation control carried forward from the operative plan but is not an ONL identification.
- c. I do not agree with Ms Armstrong's preliminary Moderate-High effect ratings. Those ratings do not adequately distinguish between the substantial physical change that would occur within Area 3 itself and the effect of that change on the values of the much wider river corridor and western escarpment landscape. Her natural character comments expressly address perceptual matters only, without a full natural character assessment or natural science information, and her wider landscape and visual conclusions are high-level and rely in part on assumptions about quarry staging and methodology.
- d. Area 3 is a relatively small, peripheral and already modified component of the much larger western escarpment. It is embedded within and visually read as part of an established quarry and infrastructure setting containing a long-established quarry, exposed faces and plant, State Highway 2 / Western Hutt Road, the rail corridor, flood-protection and recreation infrastructure, urban development, electricity transmission infrastructure and the Haywards substation complex. These elements do not remove natural values, but they materially influence landscape sensitivity and mean the change would be perceived as an incremental extension of an existing activity rather than a new isolated intrusion.
- e. The proposed 10-metre strip is a retained landscape strip, retaining the existing topography and existing vegetation which would remain in situ, with supplementary planting added to strengthen the edge. It is not intended that the strip be excavated, flattened or removed and then replanted.
- f. I support a landscape plan, including surveyed topography, retained vegetation and supplementary planting, being incorporated into the Quarry Management Plan. I also support recessive, low-reflectivity colours and a fixed maximum top-of-structure RL, to be confirmed by survey, so that specified structures do not pierce the skyline in views from across the river.

#### **4. AREAS OF AGREEMENT**

- 4.1. At paragraph 30, Ms Armstrong agrees that adverse visual amenity effects from the western berm, represented by Viewpoint 1, would be Low-Moderate at worst and therefore minor in RMA terminology. I agree that this is an appropriate upper-end description for that localised viewpoint, although my original assessment was Low.
- 4.2. I agree that natural character is relevant when considering views from and experiences within the Hutt River corridor. I also agree that the vegetated eastern face of Area 3 presently contributes some visual enclosure and screening when seen from parts of that corridor.
- 4.3. I accept that the six viewpoints in my Visual Amenity Assessment are representative rather than exhaustive. Additional locations in elevated parts of Stokes Valley, internal parts of north Taita, Manor Park and Eastern Hutt Road can be acknowledged when considering the broader visual catchment. The existence of additional viewing locations does not, however, affect my original findings.
- 4.4. I agree with Ms Armstrong that a structure which breaches the surrounding landform skyline can have a greater visual effect than a structure contained below it. I also agree that recessive colours would reduce the prominence of new structures if Area 3 is removed.
- 4.5. I agree that the 10-metre landscape strip should be described with greater certainty. I therefore support its mapped location and management being addressed through a landscape plan within the Quarry Management Plan, with clear requirements for topography, vegetation retention, supplementary planting, maintenance and any localised operational exceptions.

#### **5. EXISTING RECEIVING ENVIRONMENT AND AREA 3**

- 5.1. Belmont Quarry is an established and highly legible component of the western side of the Hutt Valley. The immediate setting includes exposed quarry benches and rock faces, quarry plant and buildings, stockpile and processing areas, haul roads, State Highway 2 / Western Hutt Road, the Hutt River corridor and urban development on the valley floor.
- 5.2. The wider landscape also contains the Hutt Valley rail corridor, bridges and arterial roads, flood-control works and recreation trails, electricity transmission lines and towers, and the Haywards electricity substation and related infrastructure to the north. Other quarrying and infrastructure activities form part of the broader western-hills and valley context.

- 5.3. I do not suggest that those modifications eliminate the natural and recreational values of the river or the vegetated western hills. Rather, landscape effects must be assessed against the environment that exists. The coexistence of natural landform, vegetation, urban development, quarrying and major infrastructure is a defining characteristic of this part of the Hutt Valley.
- 5.4. Area 3 presently provides a local vegetated foreground and screens some lower quarry activity. I accept that function. It is not, however, an intact or wholly unmodified natural spur. As Ms Armstrong records in her footnote to paragraph 30, its western face is already quarried and benched and is read in profile from Viewpoint 1.
- 5.5. Area 3 is relatively small and peripheral when considered against the extent of Belmont Quarry, the western escarpment and Belmont Regional Park. It is embedded within and visually read as part of the established quarry and infrastructure setting. It is immediately contiguous with extensive existing quarry disturbance and forms an edge between the active quarry and the modified State Highway 2 and river corridor. I therefore do not describe it as being literally surrounded by quarrying, but neither does it operate as an isolated natural feature.
- 5.6. The proposed 10-metre retained landscape strip at the front of Area 3 plays an important role in most views, highlighted in the attached illustration, **Appendix 1**. The area is regularly scanned using drone mapping (Propeller Drone Mapping and 3D Construction Data Analytics). The scan shows the existing topography of the site rising up steeply from the river, SH2 and Hebden Crescent. The quarry site boundary starts at ~RL48 with Area 3 starting at ~RL57 only ~4m into the site. Area 3 then extends ~75m back into the quarry site rising ~35m in elevation to ~RL92. The 10-metre retained landscape strip would retain the topography up to ~RL60.
- 5.7. Removal of Area 3 would materially change that particular landform and its vegetation. That physical change should not, however, be equated with an equivalent effect on the character, integrity or legibility of the wider landscape. The much larger western hills, ridge system and skyline would remain the dominant vegetated landform framework. The section 42A report also confirms that the mapped Area 3 control is an amenity and indigenous-vegetation control carried forward from the operative plan and not established through as an analysis of an Outstanding Natural Feature or Landscape.

## **6. SECTION 6(A): NATURAL CHARACTER OF THE RIVER AND ITS MARGINS**

- 6.1. I accept that section 6(a) of the RMA requires the preservation of the natural character of rivers and their margins and their protection from inappropriate subdivision, use and

development. Ms Armstrong acknowledges that she has not undertaken a full natural character assessment and does not have information about natural science values. Her comments and preliminary ratings concern perceptual aspects only. That is an important limitation when her evidence is relied on to support a Moderate-High natural character effect under section 6(a).

- 6.2. Visual screening can contribute to perceptual natural character, but screening is not synonymous with natural character. Natural character is derived from the condition, processes and experiential qualities of the river and its margins. Area 3 screens part of an existing quarry from some locations but that screening function does not by itself establish that Area 3 preserves the natural character of the river to the degree suggested. Area 3 is not contiguous with the active river channel. It is separated from the river by State Highway 2 / Western Hutt Road and associated transport-corridor land and infrastructure. Whether the more elevated quarry land falls within the statutory “margin” is a planning and legal question. Its visibility from the river corridor does not, of itself, establish that it is part of the river margin.
- 6.3. The perceptual natural character of this reach is mixed. Vegetated hills, the river and open floodplain contribute natural qualities, while the existing quarry, highway traffic, rail and bridge infrastructure, managed berms and trails, urban development and utilities are readily apparent. This modified context is evident in the character photographs and representative viewpoints appended to my original evidence.
- 6.4. In my opinion, removal of the bulk of Area 3 would create an adverse perceptual change in some localised, and very limited in my opinion, river-corridor views, particularly during the active extraction stage. With the retained 10-metre landform and vegetation strip, supplementary planting, staging and progressive rehabilitation, the enduring local effect would generally be Low. It could be Low-Moderate for limited periods and locations in the closest views during active works, however I do not consider a Moderate-High rating is correct.
- 6.5. At the wider Te Awa Kairangi / Hutt River corridor scale, Area 3 is only one small component of a mixed natural and infrastructural landscape. The retained strip would preserve a continuous vegetated toe and low-level landform edge, filter views of the quarry floor, processing area and vehicle movements, and maintain physical and visual separation from the public-facing corridor. In that wider context, I assess the adverse effect on landscape and perceptual natural-character values relevant to section 6(a) as Very Low to Low.

## **7. SECTION 6(B): OUTSTANDING NATURAL FEATURES AND LANDSCAPES**

- 7.1. Section 6(b) is a separate matter from section 6(a). It concerns the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development. An area can have natural or amenity value without meeting the “outstanding” threshold. Neither Ms Armstrong’s evidence nor the section 32 and section 42A material identifies Area 3 as an Outstanding Natural Feature or Outstanding Natural Landscape. The Quarry Amenity Protection Overlay is not an ONL schedule or classification. It is a site-specific vegetation and amenity control associated with a long-established working quarry.
- 7.2. I acknowledge that the wider western hills and Belmont Regional Park have important landscape, natural and recreational values. Area 3 can be seen as part of that broader vegetated backdrop from some locations, but it is a small, peripheral and already modified component. That visual association does not establish that Area 3 is a defining or indispensable part of the attributes and values of any wider outstanding landscape.
- 7.3. The physical change within Area 3 would be substantial, at a local level but the large-scale ridge and hill system, dominant skyline, broader vegetated backdrop and legibility of the western escarpment would remain. The newly visible quarrying would be contiguous with the extensive established quarry rather than a new or unrelated intrusion. A retained vegetated edge and progressive rehabilitation would further assist integration with the wider hills.
- 7.4. Accordingly, to the extent section 6(b) is engaged by an Outstanding Natural Feature or Outstanding Natural Landscape within the wider western hills, I do not consider removal of Area 3 would materially diminish the attributes and values that make that wider landscape outstanding. I assess the adverse effect on those wider landscape values as Very Low to Low.

## **8. AREA 3 IN THE WIDER LANDSCAPE**

- 8.1. Ms Armstrong considers Area 3 to be large and elevated enough to contribute meaningfully to the western escarpment backdrop and to the character of north Taita. I agree that it has a positive local screening and green-edge contribution. I disagree that this local function makes Area 3 a defining or indispensable component of the much larger western escarpment, or that its removal would generate a Moderate-High adverse effect on the wider landscape. From north Taita and the river corridor, Area 3 is embedded within and visually read as part of an established, highly modified quarry and infrastructure setting. It is seen with existing quarry faces and plant, State Highway 2, the rail and river-management corridors, utilities, floodplain and urban edge. The change would therefore be experienced as an incremental extension of the established

quarry rather than as a new isolated activity in an otherwise unmodified landscape.

- 8.2. The removal of Area 3 would make the quarry more visible from some eastern viewpoints and would substantially alter the landform within the Area 3 footprint, noting the mitigation the 10-metre retained landscape strip will provide. The removal does not equate to an equivalent effect on the values of the wider landscape. The change would not remove the western escarpment, sever its continuous skyline, or make the wider vegetated hills illegible as the dominant backdrop to the valley. The elevated visual material similarly shows that the enclosing hills and broader skyline remain dominant after removal.
- 8.3. Ms Armstrong also considers that removing Area 3 would make eventual quarry integration more difficult and is unlikely to be addressed by staging or the Quarry Management Plan. I disagree. Quarry landforms necessarily evolve through extraction, and their landscape management is inherently progressive and staged (stripping, extraction and rehabilitation). A static, broad vegetation overlay does not respond to changing landform, access, safety, slope-stability and rehabilitation requirements. A retained edge with a detailed landscape plan is a more targeted way to maintain the specific screening function while allowing the finite aggregate resource to be worked and rehabilitated progressively.

## **9. VISUAL CATCHMENT AND VISUAL EFFECTS**

- 9.1. The six viewpoints used in my Visual Amenity Assessment were selected to represent the closest river-trail views, Taita residential and road views, cycle and recreation trails, elevated Stokes Valley residential context and longer-distance road/trail views. A representative viewpoint method does not require a photograph from every location where some part of a proposal might be visible. I have considered the viewpoints and additional locations identified by Ms Armstrong with the following assessment:
- a. Western berm / VP1 – close view but lower than the quarry frontage with partial and screened views. Ms Armstrong and I agree that effects in RMA terms are minor with the retained strip maintaining a low level screen. Effects are Low to Low-Moderate / Minor.
  - b. Taita Drive / VP2 – the existing quarry faces and frontal operations are already visible with the highway corridor, and I view the change as an extension of the already established quarry, not a new activity in an unmodified setting. Effects are Low / minor.

- c. Rimutaka and Taita Rock trails / VP3-4 – People moving along this corridor have partial views screened by intervening vegetation but always viewed in context with the existing quarry, road infrastructure and the river. Any localised active-work may be more apparent but the retained 10-metre strip will assist with softening views. Effects are Low-moderate during works reducing to Low / minor once removed.
- d. Elevated Stokes Valley – this view is from distance with broad panoramic views across existing urban development. I consider that the quarry is one element in a much wider view with any activities occurring in this zone to visually diminish with distance. Effects are Very Low to Low / Less than Minor.
- e. Internal north Taita – from locations within this catchment intermittent or framed views from streets, open spaces and upper floors maybe possible but will be viewed in context with the existing quarry and road infrastructure. Effects are Low / minor.
- f. Manor Park – the exact location of the viewpoint is not determined but in all views the proposal is viewed in context with the existing quarry and significant road infrastructure. The removal of Area 3 would have likely Very Low to Low effects where visible.
- g. Eastern Hutt Road – views along this corridor are experienced at speed, are typically brief and will be viewed in the context of the surrounding quarry. The 10-metre retained strip will be most effective for this viewer with any effects considered Low / Minor.

9.2. In my opinion Ms Armstrong's ratings overstate both the contrast and the dominance of the change in this already modified setting, and underplays the mitigation provided by the 10-metre retained landscape strip. The 10-metre strip's internal edge is at ~RL60 and with additional planting of 8-10m, it would create a total screen (softening) height of RL68-70. Area 3 extends up to ~RL92 with views from the valley floor (RL25-30) softened by the proposed mitigation.

9.3. The fact that a view already contains the quarry does not mean that any increase in visibility is automatically minor. It is, however, a component of the assessment context. The scale of change, distance, duration, backdrop, retained screening and the expected character of quarry activity must all be weighed. On that basis, my overall visual-effects conclusion remains Low / minor, with a possible localised Low-Moderate effect during active works in the closest river-corridor views.

## **10. THE 10-METRE RETAINED LANDSCAPE STRIP**

- 10.1. The 10-metre strip illustrated in Appendix 1 has been described as a “landscape buffer strip” or “vegetation strip”. To avoid misunderstanding, I now refer to it as the 10-metre Retained Landscape Strip.
- 10.2. The intended treatment is as follows:
- a. the existing ground surface, landform and topography within the strip are retained in situ;
  - b. existing vegetation is retained where practicable and consistent with access, safety and slope-stability requirements;
  - c. supplementary indigenous planting is added to infill gaps, strengthen screening and improve long-term continuity; and
  - d. the strip is maintained as a landscape edge throughout the relevant quarry stages and into rehabilitation.
- 10.3. For clarity, it is not proposed that the 10-metre strip be excavated or removed and then replanted on a new flat platform. The green line in the elevated illustration is an indicative location marker, not a representation of finished grading or a proposal to replace the existing landform. The principal function of the retained strip is to filter low-level views of the quarry floor, processing activities, vehicles and plant from State Highway 2 and the Hutt River corridor. It is not intended to screen every upper quarry face. Full screening is neither achievable nor necessary in the context of an established visible quarry.
- 10.4. I support the Retained Landscape Strip being shown and managed through a landscape plan within the Quarry Management Plan. This is consistent with QUARZ-S7, which already requires management of visual amenity including landscape plans, and requires quarrying and rehabilitation to be undertaken in accordance with the Quarry Management Plan.
- 10.5. At minimum, the landscape plan provided to Council for approval/certification should show:
- a. the surveyed site boundary and the 10-metre strip;
  - b. existing contours or spot levels / RLs sufficient to demonstrate retained topography;
  - c. existing vegetation to be retained, any vegetation requiring removal, and the

reason for removal;

- d. supplementary planting areas, species, grades, densities and planting method;
- e. quarry staging, access or service crossings, and any localised safety or slope-stability works;
- f. maintenance, weed and pest management, replacement planting and monitoring; and
- g. performance outcomes for vegetation cover, survival and continuity of the low-level screen.

- 10.6. Localised disturbance within the strip may be necessary for access, utilities, safety or slope stabilisation. Any such disturbance should be identified in the Quarry Management Plan and accompanied by an alternative treatment or reinstatement that maintains the overall screening function, subject to approval by Council.
- 10.7. I have previously used a similar management-plan approach as the landscape witness for the Woodstock Quarry and Landfill project in Oxford, Canterbury. In that project, the landscape concept and management plans were progressively refined, coordinated with ecological inputs and supported by planting, establishment and performance standards. I consider that approach is equally capable of providing certainty here while responding to an evolving quarry landform.

## **11. HEIGHT AND APPEARANCE OF QUARRY STRUCTURES**

- 11.1. My original evidence supported a targeted exemption from QUARZ-S1 for quarry operational structures located within the quarry floor, processing area, stockpile area or yard, provided they were not on ridgelines or external faces and did not form prominent skyline elements. I accept Ms Armstrong's concern that the word "prominent" could be subjective and provide insufficient certainty. I therefore support an objective maximum top-of-structure RL in NZVD2016 for any specified exempt structure, set below the controlling skyline when viewed from representative eastern viewpoints across the Hutt River.
- 11.2. The current QUARZ-S1 standard allows 24 metres above ground level where ground level is RL 45 metres or lower, and 12 metres above ground level above RL 45 metres. A fixed top RL of RL80 for specified operational structures would provide a direct and surveyable skyline control while still recognising the quarry floor's containing topography.
- 11.3. I also support new specified structures being finished in recessive, low-reflectivity

colours selected to reduce contrast with the quarry and vegetated backdrop. Bright white, highly reflective or highly saturated finishes should be avoided except where required for safety, identification or statutory markings. In my opinion, the combination of location controls, a fixed top RL and recessive finishes provide a more precise response to the identified landscape concern than either an unrestricted exemption or a requirement for every operational structure to proceed through resource consent.

## **12. POTENTIAL CUMULATIVE EFFECTS**

- 12.1. Ms Armstrong raises the possibility of cumulative effects if the proposed Overburden Disposal Area within Belmont Regional Park and work in Area 3 operate concurrently. I agree that actual concurrent operations could be relevant to the assessment of a particular staging proposal. My understanding is that cumulative effects would only become relevant if the Fast Track consents were approved, or the Panel was minded to grant Winstone's rezoning request.
- 12.2. At present, the timing, overlap, working faces and combined visibility are not established in the evidence before this hearing. A speculative possibility of concurrent works does not justify permanent retention of the broad Area 3 overlay.
- 12.3. If concurrency becomes relevant, at a later stage of the district plan review hearings, I reiterate that the Quarry Management Plan is the appropriate mechanism to identify staging, temporary screening, progressive rehabilitation and monitoring measures.
- 12.4. The 10-metre Retained Landscape Strip would continue to provide low-level screening independently of that staging.

## **13. CONCLUSION**

- 13.1. There are several areas of agreement between me and Ms Armstrong, being:
  - a. The river and recreation corridor are relevant;
  - b. Area 3 provides some local screening;
  - c. additional viewpoints can be acknowledged;
  - d. skyline breach should be avoided;
  - e. recessive colours are appropriate; and
  - f. the 10-metre strip should be described and managed with greater certainty.
- 13.2. The principal disagreement concerns the significance attributed to Area 3 and the magnitude of effects. In my opinion Area 3 is a small, peripheral and already modified

component of an established quarry edge. It has a local screening and green-edge function, but it has not been identified or demonstrated as an Outstanding Natural Feature or Landscape and its amenity overlay is not an ONL control.

- 13.3. The physical change within Area 3 would be substantial. That change does not translate into a comparable effect on the values of the much wider river corridor or western escarpment. Ms Armstrong's Moderate-High natural character and landscape ratings are preliminary and high-level, her natural character assessment is limited to perceptual matters without natural science information, and her operational effects assessment includes assumptions about staging. Those matters, together with the modified receiving environment and the limited scale of Area 3 in the wider landscape, mean that the ratings should not be adopted.
- 13.4. My overall opinion is that any adverse landscape and visual effects would be Low / minor overall. Effects could be temporarily Low-Moderate in the closest localised river or trail views during active removal, but enduring local river-corridor landscape and perceptual natural-character effects would be Low. Effects on the wider section 6(a) and, to the extent engaged, section 6(b) landscape values would be Very Low to Low.
- 13.5. The refined package I support is:
  - a. removal of the broad Area 3 Quarry Amenity Protection Overlay;
  - b. a mapped 10-metre Retained Landscape Strip that retains existing topography and vegetation and includes supplementary planting;
  - c. a Quarry Management Plan landscape plan showing surveyed topography, retained vegetation, planting, staging, maintenance and performance outcomes;
  - d. recessive, low-reflectivity finishes for new specified quarry structures; and
  - e. a survey-confirmed maximum top-of-structure of 80RL in NZVD2016 so that specified structures do not pierce the skyline in views from across the river.

**Signature** \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'Alwe', followed by a period and a horizontal line.

**Dated** 17 July 2026





-RL 95 - TOP OF SAA

-RL 80 - TOP EDGE OF 10M RETAINED LANDSCAPE STRIP

HERDON CRES  
STATE HIGHWAY 2

QUARRY BOUNDARY VARIES BETWEEN -RL30 AND -RL50

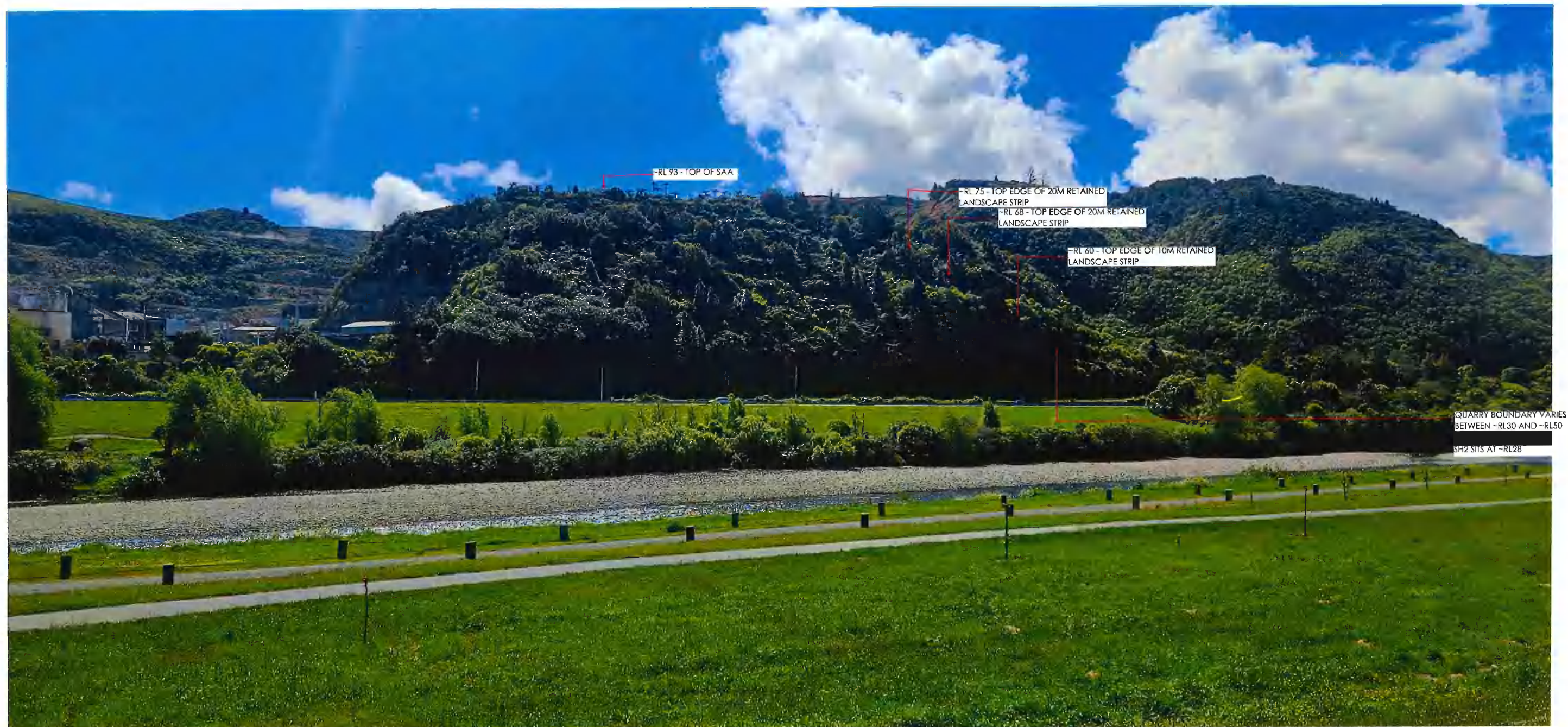
SH2 SITS AT -RL28

VIEWS FROM THE VALLEY FLOOR ARE TYPICALLY -RL25-30 AT GROUND LEVEL

## A. PROPOSED 10M RETAINED LANDSCAPE STRIP

Base Image source: Google Earth Pro

## 10M WIDE LANDSCAPE STRIP - VISUAL SCREEN



**A. EXISTING VIEW**

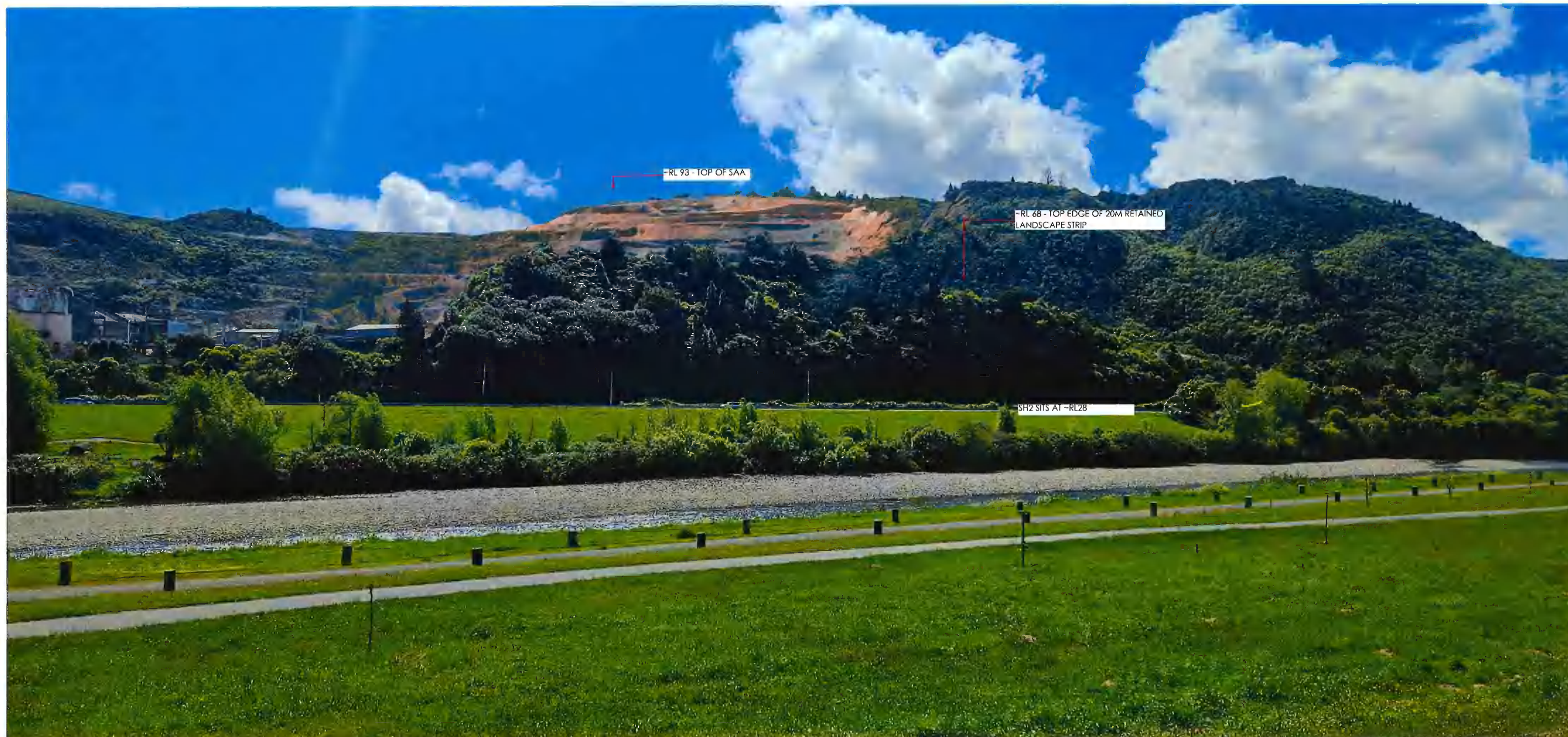
VIEWS FROM THE VALLEY FLOOR ARE TYPICALLY ~RL25-30 AT GROUND LEVEL

## VIEW FROM TOP OF STOPBANK - TAITA DRIVE - EXISTING



A. PROPOSED VIEW

## VIEW FROM TOP OF STOPBANK - TAITA DRIVE - 10M RETAINED LANDSCAPE STRIP



A. PROPOSED VIEW

## VIEW FROM TOP OF STOPBANK - TAITA DRIVE - 20M RETAINED LANDSCAPE STRIP