

I N THE MATTER of the Resource Management
Act 1991

AND

I N THE MATTER of Proposed Plan Change 114
Landscapes to the Whangarei
District Plan.

STATEMENT OF EVIDENCE OF BRIDGET MARY GILBERT

1. INTRODUCTION

Qualifications and experience

- 1.1 I am a Landscape Architect and Director of Bridget Gilbert Landscape Architecture Ltd, Auckland. I hold the qualifications of Bachelor of Horticulture from Massey University (1985) and a postgraduate Diploma in Landscape Architecture from Lincoln College (1987). I am an associate of the Landscape Institute (UK) and a registered member of the New Zealand Institute of Landscape Architects.
- 1.2 I have practised as a Landscape Architect for twenty-five years in both New Zealand and England. I am currently a Panel member of the Auckland Urban Design Hearing Panel and an Independent Hearing Commissioner for Auckland Council.
- 1.3 During the course of my career I have been involved in a wide range of projects **relating to Outstanding Natural Features ('ONFs') and volcanic features**. Specific projects include:
 - a. Consideration of the effects of the Wiri **Men's** Prison on Matukutureia;
 - b. Consideration of the effects of a proposed plan change on Pukekohe East Tuff Crater;

- c. Consideration of the effects of urban development at Orakei Point on the Orakei Tuff Crater;
- d. Consideration of the effects of residential development on Mt St John (**Te Kōpuke**);
- e. Consideration of viewshaft infringements in relation to a range of the ONFs within the Auckland volcanic field; and
- f. Review and development of District Plan landscape policy for ONFs in the Waipa District.

Many of those projects involved a close liaison with the Auckland Volcanic Cones Society and iwi.

Involvement in the Project

- 1.4 I was engaged by Horticulture New Zealand to review the policy provisions for ONFs within Proposed Plan Change 114 (**'PC114'**) to the Whangarei District Plan, specifically in relation to Whatitiri.
- 1.5 I have visited Whatitiri and the local area and have met with many of the local growers. I have also discussed the provisions with Dr Hayward, which has assisted my understanding of the geological issues of relevance at Whatitiri.

Purpose and scope of evidence

- 1.6 The purpose of my evidence is to comment on the amended provisions proposed by Horticulture New Zealand (attached to Ms Wharfe's statement of evidence) specific to Whatitiri and from a landscape perspective.
- 1.7 My evidence will address the following matters:
 - (a) Aspects of the proposed PC114 Whatitiri provisions proposed by Whangarei District Council with which I agree (Section 3);
 - (b) **The need for a brief 'introductory sentence' explaining** the rationale for introducing a separate column for Whatitiri (Category A1) in the ONF Activity Table (Section 4);
 - (c) Artificial Crop Protection Structure provisions (Section 5);
 - (d) Earthworks provisions (Section 6);

- (e) The need for expansion of the Land Preparation definition to allow for standard ground preparation works associated with establishing an avocado or kiwifruit orchard (Section 7);
- (f) Buildings provisions (Section 8); and
- (g) Assessment Criteria (Section 9).

1.8 A summary of my evidence is set out in Section 2 below.

Expert Witness Code of Conduct

1.9 I have read the Code of Conduct for Expert Witnesses contained in the **Environment Court's 2014 Practice Note** and agree to comply with that Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2. SUMMARY OF EVIDENCE

2.1 I have reviewed the proposed provisions for Whatitiri (Category A1 Large Landform ONF) attached to **Ms Wharfe's statement of evidence and confirm that** they are acceptable from a landscape perspective.

2.2 The relatively limited visibility of the ONF from public places, together with the visually complex character of Whatitiri (deriving from its vegetation patterns) and gentle profile ensure that the proposed:

- a. increase in the height of farming related buildings to 8m as a permitted activity (subject to colour controls);
- b. increase in the level of earthworks associated with farming activities to 1,000m³ (subject to a 1.5m height control on cut faces with the requirement for screening by a building , grassing or mass planting);
- c. inclusion of artificial crop protection structures as a permitted activity (subject to external vertical structure colour controls); and,

- d. expansion of the Land Preparation definition to include mounding, stepping and drainage associated with land preparation for horticultural activities,

do not compromise the visual integrity or amenity values of Whatitiri.

3. ASPECTS OF AGREEMENT

LAN.5 Table 1: Activity Table with Separate Column for Whatitiri Large Landform ONF

- 3.1 The latest set of ONF provisions attached to the Council s42A Report proposes a separate column within the ONF Activity table for Whatitiri (identified as Category A1 Large Landform ONF).
- 3.2 I confirm that this is appropriate from a landscape perspective, as Whatitiri is the only Large Landform ONF within the district that is dominated by a working rural land use (in this case, horticultural land uses). The attached aerial mapping of each of the other Large Landform ONFs within the district and the mapping of avocado and kiwifruit orcharding on and around Whatitiri in Appendix A illustrates this point.
- 3.3 I also note that Whatitiri is the only Large Landform ONF in the district that is not an Outstanding Natural Landscape (ONL).
- 3.4 In my opinion, the quite different land cover and land management context associated with Whatitiri is deserving of a different ONF policy approach to that which might be appropriate for the other Large Landform ONFs that are typically dominated by regenerating bush cover (or water) and have limited rural production uses evident.
- 3.5 I also note that such an approach of treating ONFs that are dominated by rural production uses in a different manner to other ONFs is consistent with the policy approach adopted in the Auckland Unitary Plan: Operative in Part (AUP: OiP).

Land preparation definition

- 3.6 The latest set of ONF provisions proposed by Council **deletes reference to "sod sowing, ripping with mounding or direct drilling" as an exclusion in the Land Preparation definition.**

3.7 In my opinion, sod sowing, ripping with mounding, and direct drilling comprise relatively modest earthworks activities within the context of a rounded shield volcano landform that is dominated by a complex patchwork of orchards and shelterbelts.

3.8 Such activities will not compromise the visual integrity of the Whatitiri ONF and are therefore considered to be appropriate as permitted activities from a landscape perspective.

4. ONF LARGE LANDFORM CATEGORY A1: INTRODUCTORY EXPLANATION

4.1 I consider that it would be beneficial to introduce a brief statement in the ONF provisions explaining why there is a separate category for Whatitiri in LAN.5 Table 1 (i.e. Large Landform Category A1). This would assist plan users and decision makers in understanding the intention of the different policy provisions associated with ONF Category A1. I also note that such an approach has been included in the AUP:OIP ONF provisions, which (as mentioned above) also **identify a separate 'subcategory' for large landform ONFs in working rural environments.**

4.2 It is recommended that the following explanatory sentence is added at LAN 8.3:

The A1 Large Landform ONF relates to Whatitiri which comprises a Large Landform ONF in a working rural environment. The Whatitiri ONF is not an Outstanding Natural Landscape and is considered to be sufficiently large and robust to withstand appropriately scaled rural production related land disturbance or constructions without significant impact.

5. ARTIFICIAL CROP PROTECTION

5.1 It is my understanding that reference to Artificial Crop Protection Structures has been removed from the definition of Buildings and a separate definition included **in the Council's latest text.**

5.2 The amended provisions proposed by Ms Wharfe seek to include a separate item in the LAN.5 Table 1 activity table that provides for Artificial Crop Protection as a permitted activity at Whatitiri (only), subject to external vertical protection

structures comprising green or black windbreak cloth and a height control of 10m.

- 5.3 The proposed 10m height control derives from the height of live shelterbelts in the area and the permitted activity conditions in the RPE underlying zone.
- 5.4 The very limited visibility of Whatitiri from public places plays a role in the acceptability of such structures.
- 5.5 The mapping in Appendix B depicts the public areas from which the ONF is visible and Appendix C includes photographs of the typical character of such views (refer Appendix B for approximate photograph locations).
- 5.6 In summary, roadside vegetation and intervening plantings serve to obscure views of the landform from the majority of the surrounding road network. This includes views from the public walkways on the top of Maungatapere and from the reserve land at the crest of Whatitiri where bush vegetation serves to screen views.
- 5.7 Where Whatitiri is visible (refer Appendix B mapping and Appendix C Photographs), for the most part it reads as a complex patterning of shelterbelts and orchard plantings interspersed with the odd patch of pasture.
- 5.8 In the majority of views, the lower elevation of the viewer relative to the feature serves to amplify the screening effect of vegetation throughout the landform such that there is an extremely limited awareness of dwellings, sheds, tracks and the like throughout the orchards themselves. (I will return to this point shortly under my discussion of earthworks and buildings.)
- 5.9 The exceptions to this are the more elevated public vantage points to the east on Newton Road and Roose Rise, and from the public walkway on Maunu (to the north east), where there is a greater appreciation of the patterning of the landscape within orchards (due to the higher elevation of the viewer relative to the ONF). However, again the patchwork of orchard plantings and shelterbelts interspersed with areas of pasture gives rise to a highly complex visual landscape that has a high capability to absorb visual change.
- 5.10 For all of the views available of Whatitiri (including those from more elevated vantage points), it is my opinion that the introduction of 10m high green or black external vertical artificial crop protection structures will merge with the visually complex context, such that the structures will be barely discernible.

- 5.11 It is my understanding that high-value kiwifruit gold crops tend to favour the use of white horizontal crop protection structures. The horizontal crop protection is primarily required to prevent wind and hail damage and white fabric is required to enable adequate sunlight access. Refer Appendix D Photograph 5.
- 5.12 Such structures have the potential to be highly prominent, particularly on sloping land (as is the case with Whatitiri), and therefore suggest the potential to detract from the visual amenity and integrity of the landform feature.
- 5.13 The extent of kiwifruit orchards throughout the landform is limited. Field survey revealed that it is only from more elevated and distant public vantage points to the east/north east (Maunu and Newton Road), that the existing white crop protection structures are visible. Refer Appendix C Photograph 1.
- 5.14 In my opinion, the extremely limited extent of kiwifruit orcharding combined with its limited visibility from the surrounding landscape, largely due to the **'screening' effect** of shelterbelt and roadside vegetation patterning and the lower elevation of the majority of viewers, means that enabling white artificial crop protection structures as a permitted activity will not pose a threat to the visual amenity or integrity of the ONF.

6. EARTHWORKS

- 6.1 The latest set of provisions proposed by Council allow earthworks up to 300m³ and the maintenance and construction of farm and public walking tracks (and the like) as a permitted activity. These provisions are supported from a landscape perspective. The relatively low profile of the landform feature, together with its relatively gentle contour, limited visibility from public places in the surrounding area and the complex vegetation patterning throughout, are such that earthworks of this scale will not detract from the visual amenity or integrity of the landform feature.
- 6.2 The amended provisions proposed by Ms Wharfe seek to increase the volume of earthworks allowed as a permitted activity from 300m³ to 1,000m³ provided that they are associated with farming activities, do not require a cut/fill face of greater than 1.5m height, and vertical faces are either screened by a building, grassed or mass planted.

- 6.3 Within a landform feature such as Whatitiri, adverse landscape and visual effects associated with earthworks are most likely to arise as a consequence of large scale cut (and fill) faces **as described in Dr Hayward's evidence**.
- 6.4 In my opinion, the restriction of earthworks cut/fill heights to 1.5m and the **requirement for them to either be screened or 'greened'** within a context that is dominated by a complex patterning of large scale vegetation, will ensure that earthworks faces do not adversely impact on visual amenity values.
- 6.5 The requirement for earthworks of this scale to be associated with farming activities can give Council confidence that this relaxation in the earthworks provisions will not be used for residential building purposes.
- 6.6 Further, the relatively limited visibility of the landform feature from the surrounding area and patchwork patterning of grazing land means that, were such provisions taken up on pastoral areas within the ONF, they would either have little or no influence on the visual integrity of the feature, or would be at **least partially obscured by 'neighbouring' vegetation patterns (predominantly shelterbelt patterning)**. Whilst I acknowledge that such vegetation features are not protected under the District Plan, the considerable investment associated with both avocado and kiwifruit orchards can give a degree of confidence that the majority of existing vegetation patterns will remain in place.
- 6.7 In coming to my conclusions with respect to the potential adverse landscape effects associated with the scale of earthworks put forward by Ms Wharfe, I have also **given careful consideration to Dr Hayward's comments** on the effects of earthworks of this scale on the integrity of the geological feature.
- 6.8 On balancing these considerations, it is my view that the earthworks provisions recommended by Ms Wharfe are acceptable from a landscape perspective.

7. LAND PREPARATION DEFINITION

- 7.1 As outlined earlier, I concur with the proposed amendment to the Land preparation definition proposed by Council.
- 7.2 In considering the earthworks rules, it has come to my attention that the earthworks limits proposed by Ms Wharfe may well trigger consent requirements for standard orchard practises such as mounding to grow avocados, **'stepping'** to form more gentle orchard profiles and the creation of drains or swales along the lower edge of each orchard block to improve ground conditions. From my

site visit, earthwork faces associated with each of these activities tend to range from approximately 600mm to 1m high and are not discernible from the wider area (including higher vantage points). Refer Appendix D Photographs 1-4, 6 and 7.

- 7.3 For these reasons, **I concur with Ms Wharfe's proposed amendment to the Land Preparation definition to include 'mounding, stepping and drainage associated with land preparation for horticultural activities'**.

8. BUILDINGS

- 8.1 The latest Council provisions allow buildings up to a height of 5.5m as a permitted activity.

- 8.2 The provisions recommended by Ms Wharfe enable buildings associated with farming activities up to a height of 8m, subject to colour controls:

a. maximum reflectance value of 30%.

- 8.3 In my opinion, the more permissive approach to buildings recommended by Ms Wharfe for Whatitiri is acceptable from a landscape perspective due to:

- a. the limited visibility of the landform from the surrounding area;
- b. the high visual absorption capability of the area as a consequence of the vegetation patterns;
- c. the diminutive scale of such buildings within a context dominated by 10m high shelterbelts and 6-8m high avocado trees; and
- d. the visually recessive appearance of the 'permitted' buildings due to the colour controls.**

- 8.4 The scale of building envisaged by Ms Wharfe's provisions as a permitted activity is very similar to the scale of farming (or in this case, horticulture) related buildings evident throughout the ONF. As mentioned earlier, field survey revealed that there is an extremely limited awareness of buildings throughout the orchards themselves from the surrounding area, suggesting the capability to absorb additional buildings of this scale without compromising the visual integrity of the landform feature.

- 8.5 The introduction of colour controls will ensure that where visible (for example on one of the small patches of pasture), such buildings will not draw the eye or

be visually intrusive, but rather read as part of the complex patterning of dark elements (i.e. vegetation) that dominate the visual appearance of the ONF.

- 8.6 It should be noted that such colour controls are applied to buildings in ONFs in the AUP:OIP. Further colour controls of this type are easily administered, as paint suppliers such as Resene, and roofing suppliers such as Coloursteel, have reflectance value ratings for all of their products.

9. ASSESSMENT CRITERIA

- 9.1 I confirm that the text amendments to the assessment criteria proposed by Ms Wharfe are supportable from a landscape perspective.

Bridget Gilbert
29 June 2017