

BEFORE THE AUCKLAND UNITARY PLAN INDEPENDENT HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991
and the Local Government (Auckland
Transitional Provisions) Act 2010

AND

IN THE MATTER of Topic 017 RUB South

AND

IN THE MATTER of the submissions and further submissions
set out in the Parties and Issues Report

**STATEMENT OF REBUTTAL EVIDENCE OF ALASTAIR ROBERT JAMIESON
ON BEHALF OF AUCKLAND COUNCIL**

(OUTSTANDING NATURAL FEATURE – CRATER HILL)

18 DECEMBER 2015

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1. SUMMARY

1.1 My name is Alastair Robert Jamieson.

1.2 I developed the Outstanding Natural Feature (**ONF**) overlay for the Proposed Auckland Unitary Plan (**PAUP**), and provided evidence on this matter for the hearing on Topic 019, Natural features, Landscape and Character. I also previously provided evidence regarding the extent of the Rural Urban Boundary (**RUB**) at Puhinui, specifically with regard to the Crater Hill volcano ONF, on behalf of Auckland Council (**Council**).

1.3 I have been asked by the Council to provide rebuttal on the evidence of Russell Gibb and Emma Bayly as it relates to ONFs.

1.4 In my opinion, the inclusion of the Crater Hill volcano ONF within the RUB would create an expectation that subdivision and development could be carried out that would have an unacceptable adverse effect on the feature. Therefore, I do not consider the RUB should be extended to include the site.

2. INTRODUCTION

2.1 My full name is Alastair Robert Jamieson. I am a Biodiversity Team Manager (Regional) at Auckland Council, a position I have held since October, 2012. Prior to that date, I was a consultant advisor to Auckland Council on natural features matters within the Proposed Auckland Unitary Plan (**PAUP**) in my position of Director, Wild Earth Media Ltd.

2.2 My qualifications and experience are set out in my primary statement of evidence.

3. CODE OF CONDUCT

3.1 I confirm that I have read the Code of Conduct for Expert Witness contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

4. SCOPE

- 4.1** I have read the statements of evidence of Russell Gibb and Emma Bayly on behalf of the Self Trust. I address their evidence as it relates to Outstanding Natural Features.

5. THE EVIDENCE OF RUSSELL GIBB ON BEHALF OF THE SELF TRUST

- 5.1** In Paragraph 1.2 of his evidence, Mr Gibb suggests that bringing the Self Trust property at Crater Hill within the RUB will not have an adverse effect on the archaeological and heritage values of the site and that reducing the size of the ONF overlay will not significantly affect these values.
- 5.2** In my view, it is important not to confuse the archaeological features and values of the site with the geological, landform and landscape values that are the reasons for its identification as an ONF. The spatial extent of the ONF is defined by the geological landform, and is not determined by the extent of archaeological features of the site.
- 5.3** For the reasons discussed in my primary evidence for this Topic, and for Topic 019, I consider that protection of the whole volcanic feature is warranted, including the outer slopes of the volcano, extending down to Waokauri Creek as mapped in the PAUP ONF overlay.
- 5.4** I consider that inclusion of Crater Hill within the RUB would signal that a greater level of development is suitable than what is currently provided for. I disagree that this would not lead to unacceptable adverse effects on the ONF, and consider that leaving the majority of Crater Hill volcano ONF outside of the RUB is necessary for the appropriate protection and integrated management of the important landform and geological values of the site. Exclusion from the RUB is also consistent with the ONF overlay mapping and provisions.
- 5.5** In Paragraphs 8.1 and 8.2 of his evidence, Mr Gibb identifies areas that he considers should be excluded from the ONF, including a heavily modified hillock to the northwest of the rim that was levelled by bulldozer, and archaeologically excavated area, and kiwifruit orchards on the eastern extent.

- 5.6** Portions of the volcanic feature that, in my opinion, have been destroyed or heavily modified are already excluded from the ONF extent (e.g. the road formation for State Highway 20, the quarry zone and main quarried area).
- 5.7** I do not consider the area of archaeological excavation or kiwifruit orchards to be modified in ways that detract from the values of the site. The landform is essentially intact in these areas, and they are in much better condition than many sites that warrant identification as ONFs in the PAUP.
- 5.8** Although the small knoll on the northern edge of the crater rim was levelled over 50 years ago, I consider it is still appropriate for this area to remain within the ONF as further modification such as earthworks or construction would detract from the physical and visual integrity of the surrounding ONF, particularly given the prominent position on the crater rim.
- 5.9** I consider that retaining these areas within the ONF is consistent with the approach taken for other ONFs in the overlay, many of which contain modified areas which still contribute to the integrity of larger landforms, such as on many of the volcanic cones.
- 5.10** At Paragraph 9.3 of his evidence, Russell Gibb suggests that the reduction of the ONF on the crater slopes would permit development of the slopes where the archaeological record is limited and any unrecorded archaeological sites are likely to have been significantly impacted upon by prior activities.
- 5.11** The extent of the ONF is not related to archaeological features that may be present. As canvassed in my primary evidence, I consider that the extent of the ONF proposed in the PAUP is necessary to appropriately manage this relatively unmodified volcanic landform. The crater slopes that Mr Gibb considers could be excluded from the ONF and developed are an integral part of the ONF that warrant protection in my opinion. I disagree that reducing the extent would be appropriate with respect to ONF values.

6. THE EVIDENCE OF EMMA BAYLY ON BEHALF OF THE SELF TRUST

- 6.1** In Paragraph 6.3 of her evidence, Ms Bayly contends that the natural, archaeological and mana whenua features of value “can be protected in a manner that still enables a significant area of the site (ie approximately 40-50 hectares) to be developed for urban purposes in a manner sensitive to its surroundings.” At Paragraph 6.12 of her evidence, Ms Bayly reiterates the opinion of Mr Gibb and Mr Scott that the extent of the

Outstanding Natural Feature should be limited to the central part of the site where the crater is located, as the surrounding land has been compromised.

- 6.2** I disagree, and consider that an approach of fragmenting the site any further to provide areas for development is not appropriate or consistent with protecting the values of the Crater Hill ONF. As discussed in my primary evidence, I consider the importance of this site as an ONF arises from its relative completeness as an example of an explosion crater with the surrounding tuff ring and outer slopes relatively intact, so protection of the entire ONF is important.
- 6.3** Emma Bayly notes at Paragraph 6.15 of her evidence that the ONF excludes land to the north of the submitter's land, which appears to her to be just as much a part of the volcanic feature as the lower flanks within the Self property.
- 6.4** I agree that the land in question does form part of the same volcanic landform as the area identified as ONF. However as explained in my primary and rebuttal evidence for Topic 019, in mapping the ONF for the PAUP, my brief was generally to refine the operative maps, rather than to start afresh and map what I considered to be the full geological extent of each landform or site. In this case the ONF mapping closely follows the corresponding extent mapped as a Regionally Significant Volcanic Features in Map Series 2a Sheet 4 in the operative Auckland Council Regional Policy Statement.

7. CONCLUSION

- 7.1** Section 6(b) of the RMA identifies as a matter of national importance "the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development".
- 7.2** I consider that the exclusion of most of the Crater Hill volcano ONF from the RUB is necessary to ensure its appropriate protection and management, and that no extension of the RUB in this location is warranted.

Alastair Jamieson
18 December 2015