

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

AND

IN THE MATTER of Topic 017 RUB South

AND

IN THE MATTER of a submission pursuant to section 123 of the Local Government (Auckland Transitional Provisions) Act 2010 and Schedule 1 of the RMA in respect of the **PROPOSED AUCKLAND UNITARY PLAN**

**STATEMENT OF EVIDENCE OF RACHEL DE LAMBERT FOR DAVID TAM /
LAKE BRUNNER LODGE (2005) LIMITED (SUBMITTER 3821)**

IN RELATION TO TOPIC 017 – RUB SOUTH

16 NOVEMBER 2015

1. SUMMARY STATEMENT

- 1.1 I am providing evidence for Lake Brunner Lodge (2005) Limited (the submitter), being the successor in title to David Tam with respect to the site at 72 Tidal Road, Mangere (the Site). My evidence considers whether from a landscape and visual perspective, it is appropriate for the site to be brought within the Rural Urban Boundary (RUB) and made available for urban (light industrial) development under the proposed Auckland Unitary Plan (PAUP), as recommended by Council and sought by the submitter.
- 1.2 The Site is 14.8ha in area. It sits within a wider landscape which is lacking in coherence and has a lower sensitivity to change than many other coastal areas within the Auckland Region.
- 1.3 Under the PAUP, the Site is contiguous with land zoned Light Industry to the west and Single House to the east across Tidal Road. The site is also adjacent to an Outstanding Natural Feature (ONF) overlay related to the Crater Hill volcanic explosion crater geomorphological feature.
- 1.4 I consider Crater Hill to be an Outstanding Natural Feature (ONF) as identified in the PAUP. For completeness, I note it is also identified in Schedule 6E of the operative District Plan as a 'Geological Feature to Be Protected'. I further consider that the subject land, which has been highly modified through rural land-use including present day market gardening, is outside of the ONF and that it is appropriate for an urban form of development.
- 1.5 The detailed mapping of the Crater Hill ONF suggests that the mapped feature just extends into the Site along and parallel with its southern boundary incorporating the Macrocarpa shelter belt on this boundary. Council supports this alignment however in my opinion the shelter belt relates to the rural / horticultural land-use of the Site, rather than the values of the volcanic explosion crater feature. I consider this to be a fine grain mapping error and that the ONF boundary should more appropriately follow the legal title boundary of the Site.

- 1.6 The proposed light industrial land use is consistent with the surrounding area and it is my opinion that any potential adverse landscape or visual effects of development in respect of the adjacency to and potential impact on the ONF can be appropriately managed through design. I also consider that any potential effects in respect of the interface with residential development across Tidal Road can be avoided or mitigated.
- 1.7 It is my opinion that the future use of this large site for light industrial purposes can meet the provisions of the objectives and policies found in RPS Chapter B4.3.2 of the PAUP being those related to 'Landscape, Natural Features, Volcanic Viewshafts and Height Sensitive Areas.
- 1.8 In terms, therefore, of section 6(b) of the Resource Management Act – the protection of outstanding natural features and landscapes from inappropriate subdivision use and development – it is my opinion that the proposal to include this land within the RUB and zoned Light Industry will continue to provide for the protection of the Crater Hill ONF.
- 1.9 Overall, I support the Site being brought within the RUB from a landscape and visual perspective and being made available for urban (light industrial) development, for the following reasons:
- (a) The proposed Light Industry zoning is consistent with the established (and highly modified) landscape character of the locality, and would read together with that contiguous development including the existing Light Industry zoned land immediately adjacent to the west.
 - (b) The Site is large enough to accommodate light industrial development and associated activities, while still having sufficient land to provide the necessary landscape / amenity interface with the ONF and the residential area across Tidal Road to the northeast that would be required for such development.
 - (c) The Site can be developed without unduly impacting on the values which make Crater Hill an ONF (as outlined by Mr Brown, and with which I agree), or diminishing its presence as a key landscape and geomorphological feature, therefore being consistent with the requirements of section 6(b) of the RMA.

2. INTRODUCTION

2.1 My name is Rachel Virginia de Lambert, Landscape Architect and Technical Leader / Design for Boffa Miskell.

Qualifications and experience

2.2 My qualifications and experience are set out in the evidence in chief I gave before the Independent Hearings Panel (IHP) with respect to Topic 032.

Purpose and scope of evidence

2.3 I have been asked by the submitter to provide evidence as to whether it is appropriate from a visual and landscape perspective for the Site to be brought within the RUB and given an urban (Light Industry) zoning, as recommended by Council and sought by the submitter.

2.4 My evidence is structured as follows:

Section 3 – Wider Landscape Character and Context

Section 4 – Site Character

Section 5 – Planning and policy context

Section 6 – Proposed Light Industry Zoning and inclusion within the RUB

Section 7 - Conclusion

2.5 A summary of my evidence is set out in Section 1 above.

Expert Witness Code of Conduct

2.6 I have been provided with a copy of the Code of Conduct for Expert Witnesses contained in the Environment Court's 2014 Practice Note. I have read 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.

3. WIDER LANDSCAPE CHARACTER AND CONTEXT

- 3.1 The Site is located within the suburb of Mangere in south Auckland and currently forms part of a wider undeveloped area which exists between the urban fringes of Mangere, Papatoetoe and Manukau and the Manukau Harbour.
- 3.2 Although undeveloped in an urban sense, this landscape has been highly modified by a myriad of human uses which include market gardening, horticulture, and dry stock pasture. Other uses include the Aviation Country Club (golf course) and the Manukau Memorial Gardens. Figures attached at **Appendix 1** show the site in relation to its wider landscape context.
- 3.3 This wider area is enclosed by a number of highly urbanised and industrialised land uses which include the Auckland International Airport, the business centres at Mangere and Wiri, and the major transportation corridors of State Highway 20, 20A and 20B. Additionally, two quarries are located within the wider context of the Site, including the Crater Hill quarry which is situated approximately 150m from the eastern Site boundary, within the volcanic explosion crater. In combination, this diversity of land use has led to a wider landscape which is lacking in coherence, and has a notably lower sensitivity to change than many other coastal areas within the Auckland region.
- 3.4 A small business area is located to the north of the Site. This comprises a number of warehouses and light industrial activities, including a manufacturing building with a 25,000m² footprint – the ‘Temperzone’ Quality Air Conditioning facility. This industrial area also includes the Malaeola Community Centre (Church) at the end of the Waokauri Place cul de sac, which occupies a former theme park (adapting the former commercial building to its new use).
- 3.5 Directly east of the Site lies an area of housing located between Tidal Road and the South – Western Motorway (SH20). This residential area comprises a row of residential lots of around 600m² lining the eastern edge of Tidal Road, with rear lots (generally of a larger size) also accessed from this one road frontage. The street front lots typically

accommodate single storey dwellings, set back approximately 10m from the road boundary.

- 3.6 In terms of relief, this wider coastal area replicates the topography of the Mangere suburb, with little elevation variance. Nevertheless, the area includes a distinctive incised coastal edge, formed from a sequence of coastal inlets and channels which include: Tautauoa Creek, Pūkaki Creek, Otaimako Creek, and Waokauri Creek. The latter extends close to the Site's southern boundary and connects to an unnamed watercourse which runs parallel to the Site's western boundary.
- 3.7 These coastal inlets infold two notable geomorphological features, being the volcanic explosion craters of Crater Hill and Pūkaki Lagoon/ Te Pukai Tapu o Poutukeka, both of which are identified as Outstanding Natural Features (ONF) within the PAUP.
- 3.8 Pūkaki Lagoon / Te Pukai Tapu o Poutukeka remains in public ownership and has experienced little modification by human uses, although housing is present on its north and eastern flanks. Crater Hill is largely in private ownership, with a small area of publicly owned land around the crater lake. The tuff ring associated with the volcanic crater of Crater Hill forms an elevated ridge alongside part of the Site's southern boundary. A high point upon this ridge (39 metres above mean sea level (MSL)) is used for a beaconed trig station.
- 3.9 The Site is located within the Manukau Ecological District. It adjoins an extensive area of coastal mudflats in the western and southern Manukau Harbour that are subject to a Significant Ecological Area (Marine 2) overlay under the PAUP.

4. SITE CHARACTER

- 4.1 The Site itself comprises approximately 14.8 ha and includes sloping land around an unnamed stream gully. The Site rises towards the tuff ring of Crater Hill to a high point of 26.2m MSL in the south eastern corner and falls to a low point of 1.8m MSL in the south western corner on the banks of the unnamed stream. An engineered pond is located at the head of the stream gully.

- 4.2 The Site is currently utilised for market gardening purposes and is either cultivated, or covered in herbaceous fallow species. Woody vegetation cover is largely confined to the Site's periphery and around the existing watercourse. A stand of tall mature macrocarpa trees is located along the southern boundary, and a single specimen demarcates the eastern corner of the Site.
- 4.3 An existing dwelling and three small sheds are located within the Site, all of which appear to be in a relatively rundown condition – with the uninhabited dwelling set amongst an overgrown garden area.
- 4.4 Attached at **Appendix 2** are a series of photographs, along with a plan showing the viewpoint locations that illustrate the Site and its immediate landscape context. These show the established nature of the Site as experienced from public viewpoints as well as the surrounding land uses.
- 4.5 The mix of existing small and large scale industrial buildings in the adjacent area are shown in Photograph Viewpoints 4 (right), 5 (left and right), 6 (left), and 7 (left and right). The housing lining the northeast side of Tidal road is illustrated in Viewpoint 1 (right).

5. **PLANNING AND POLICY CONTEXT**

- 5.1 The site is currently zoned Rural under the operative Manukau Section of the Auckland District Plan ("District Plan"). Under the PAUP it has a Rural Production zoning and adjoins land zoned Light Industry to the north, Rural Production to the south (albeit separated by an unformed section of Portage Road (a legal paper road)) and Single House to the east across Tidal Road.
- 5.2 In terms of relevant overlays, the site is not within an Outstanding Natural Landscape, or High / Outstanding Natural Character Area. The site does not have any height sensitivity overlays.
- 5.3 The site is adjacent to an Outstanding Natural Feature overlay (ONF) related to the Crater Hill volcanic explosion crater geomorphological feature.

- 5.4 Mr Stephen Brown in his evidence on behalf of Auckland Council provides the following description of the Crater Hill ONF with which I concur:

“Crater Hill lies at the strategic nexus of the upper Waokauri Creek – abutting both the northern edge of Manukau Memorial Gardens and the western margins of SH20. At its core, Crater Hill is one of the two most significant remaining explosion craters and tuff rings within the former Manukau City (the other crater is nearby Pukaki Crater / Te Pukai Tapu o Poutukeka – see Annexure 1). Crater Hill’s form is complex, with a large, embayed tuff ring that is some 600m in diameter enclosing a partly quarried, scoria cone and small lava flow. Uniquely, within the wider Auckland volcanic field, Crater Hill contains the cooled remnants of a lava lake that filled the maars (explosion crater), and then largely withdrew back down the volcanic vent. Furthermore, it is the only remaining explosion crater within the field that retains external walls around the crater rim, which are almost entirely intact and unmodified (Annexures 2 & 3). Two lava caves are also present: Selfs Lava Cave is approximately 48m long, loosely following the circumference of the tuff ring, while the 40m long Underground Press Lava Cave contains a large main chamber that was reputedly used for the clandestine, subversive publishing during WWII – hence, its name. Although the Crater Hill quarry faces and exposures clearly disfigure part of the internal crater, they also have educational value as they display successive layers of lithic tuff, basaltic lapilli, areas of crater rim collapse and a thin layer of rhyolitic tephra from the Central North Island volcanic emissions.”

- 5.5 Attached at **Appendix 3** is a Figure showing the mapping of the Crater Hill ONF relative to the Site. This shows that, at a detailed mapping level, the ONF is defined to include the Macrocarpa shelterbelt along the Site’s southern boundary. In my opinion, the ONF boundary should logically follow the legal title boundary in this location, as the Macrocarpa shelter belt is more strongly related to the use of the site for rural activities and market gardening than it is to the geomorphological features of the explosion crater and in particular to the *“external walls around the crater rim, which are almost entirely intact and unmodified”* (from Mr. Brown’s quote in paragraph 5.4 above).

- 5.6 A Significant Ecological Area (“SEA”) extends into a very small area (approximately 56 m²) of the south western corner of the Site. This SEA reflects the importance of the mudflats extending out from Puhinui, Pūkaki, and Waokauri Creeks as foraging and roosting habitat for wading birds.

6. APPROPRIATENESS OF PROPOSED RUB RELOCATION AND REZONING

- 6.1 In its evidence for Topic 017, Council has recommended (consistent with the Submitter’s request) that the Site be brought within the RUB, and thus made available for urban development. I understand that once inside the RUB, the Site is likely to be zoned Light Industry.
- 6.2 The Light Industrial zoning provides for a range of activities which include light manufacturing, production, logistics, storage, transport and distribution activities. Both the notified provisions, and the proposed Council amendments through the IHP process, include objectives which relate to managing effects on the natural environment and adjacent amenity values. Buildings up to 20m in height are provided for within this zone, and the general impervious area provisions allow for 80% coverage, reduced to 10% within a riparian yard (10m from the edge of permanent and intermittent streams). There is a 25m yard in respect of Coastal Protection, defined in respect of MHWS.
- 6.3 From a visual and landscape perspective, I support the Site being brought within the RUB and being made available for urban (light industrial) development, for the following reasons:
- (a) The proposed Light Industry zoning is consistent with the established (and highly modified) character of the locality, including the existing Light Industry zoned land immediately adjacent to the west, as outlined in section 3 above.
 - (b) The Site is large enough to accommodate light industrial development and associated activities, while still having sufficient land to provide the necessary landscape / amenity interface with the ONF and the residential area across Tidal Road to the northeast that would be required for such development. From a visual and landscape perspective, I therefore do not consider that zoning the Site Light

Industry (once inside the RUB) will create conflict with residential uses along the northern end of Tidal Road as suggested in Attachment C¹ of Mr Wong's evidence (regarding RUB Assessment Criteria 11).

- (c) The Site can be developed without unduly impacting on the values which make Crater Hill an ONF (as outlined by Mr Brown, and with which I agree), or diminishing its presence as a key landscape and geomorphological feature, therefore being consistent with the requirements of section 6(b) of the RMA. Importantly in this regard, I note that:
 - (i) Any development of the site will not impinge physically on the Crater Hill volcanic landform (the ONF) leaving the outer western flank / external wall of the crater rim landform intact. Such development would sit adjacent to rather than 'on' the volcanic feature / ONF, thereby retaining the integrity of its crater rim landform.
 - (ii) When driving down Tidal Road toward Crater Hill the crater rim will remain on axis with its outer flank intact, as illustrated in Photograph 1 below. Furthermore views to Crater Hill from SH20 (which Mr. Brown considers to be the most important) would not be affected by development of the site.
 - (iii) Whilst it remains my opinion that the boundary of the Crater Hill ONL should logically follow the southern legal boundary of the Site, rather than the adjacent (parallel) Macrocarpa shelter belt, future light industrial development of the Site can in my opinion be achieved to avoid adverse landscape or visual effects on the adjacent ONL as currently mapped in the PAUP.

¹ Statement of evidence of David Wong on behalf of Auckland Council (Planning – Puhinui) for Topic 017 RUB South, 16 October 2015.



Photograph 1: View looking southeast down Tidal Road toward the Crater Hill landform.

7. CONCLUSION

- 7.1 Overall, I consider bringing the Site within the RUB (and its subsequent rezoning to Light Industry) to be appropriate from a visual and landscape perspective, for the reasons outlined above. In particular, providing for urban (light industrial) development on the site will not physically impinge on, or detract from the existing values of, the Crater Hill ONF.

Rachel de Lambert

Boffa Miskell

16 November 2015