

BEFORE THE AUCKLAND UNITARY PLAN (PAUP)  
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 016 RUB North

**STATEMENT OF REBUTTAL EVIDENCE OF**

**Di Lucas, landscape architect**

for The Long Bay - Okura Great Park Society  
and the Okura Environment Group

**the Okura RUB**

18 December 2015

## Introduction

1. My full name is Diane Jean Lucas. I am a landscape architect and the director of Lucas Associates, a landscape planning, design and management practice I established in Canterbury in 1979. I work throughout New Zealand.
2. I hold a Master of Landscape Architecture (planning) and a Bachelor of Science. I am a Fellow of the New Zealand Institute of Landscape Architects (1987), a Registered NZILA Landscape Architect, and, a certified Resource Management hearings commissioner and former NZILA President.
3. My landscape planning Masters thesis explored information systems, resulting in land typing, and explored public perceptions regarding %imits of Acceptable Change+, specifically addressing vegetation change in rural landscapes.
4. Through research and application, I have developed a number of landscape, ecological, natural character, cultural and heritage analysis and assessment approaches, including land typing as a planning and assessment basis. I have studied various coastal and marine environments. I have received the NZILA premier landscape planning award twice and the NZILA Landscape Planning Gold Award. The 2014 study the *Natural Character of the Marlborough Coast. Defining and Mapping the Marlborough Coastal Environment*, Boffa Miskell, Lucas Associates and Department of Conservation, for Marlborough District Council (320 pp.) was runner up in the 2015 NZILA Landscape Planning and Environmental Studies Award.
5. I have previously undertaken natural character and landscape assessments of coastal environments within Northland, Auckland, Waikato, Hawkes Bay, Wellington Tasman, Nelson, Marlborough, Canterbury, Otago, West Coast and Southland Regions. Earlier assessments, including the Canterbury Regional Landscape Study (Boffa Miskell & Lucas Associates, 1993) used a land typing framework and developed assessment factors that became known as the Pigeon Bay factors. These became recognised as professional best practice are referenced by Stephen Brown's evidence for 015 RUB North/West for AC, dated 15 October 2015 (para.11) and form the basis for NZCPS Policy 15. They are frequently grouped to address bio-physical, perceptual/experiential and associative aspects of landscapes.

6. I have been asked to provide evidence in relation to the appropriate location of the RUB proposed in the PAUP along Piripiri Ridge and Vaughans Road. I have previously assessed the area in relation to land use and landscape planning for Weiti, Okura and Long Bay, including facilitating public consultation, consulting with tangata whenua and undertaking management planning for Long Bay reserve lands, for both Rodney District and North Shore City Councils. I provided evidence to the Environment Court hearings that addressed development on lands around Okura (2002) and the Long Bay Structure Plan (2008). Those Courts supported limiting urbanisation to south of the Okura watershed and sought that any development toward the Okura had a rural character supportive of the natural character and landscape values of the catchment to the Okura Estuary. A few months ago I provided evidence for PAUP Topic 019 Natural Features, Landscape and Character regarding Long Bay - Okura.
  
7. I read the RUB (North & Northwest) Preliminary Landscape Investigation for Auckland Council (ENPAD August 2013). I note in addressing the broad Silverdale area, that Coastal Headland Hills were mapped across the South Okura lands: *Steep to moderately steep harbour hill country margins. Frames coastal margins. Important areas in regard to Natural Character.* These Okura lands being considered were recognised for their important natural character and coastal relationship. I address these south Okura lands as Okura East and Okura West, flanking Okura Village (Attachment 9).
  
8. I address the RUB as delineated in the PAUP along the watershed<sup>1</sup> between Long Bay and Okura. That is, the RUB located along Vaughans Road and Piripiri Ridge and out to Piripiri Point. To consider proposed delineations as per the PAUP, I have re-visited the area several times since notification. I have considered the PAUP and the evidence from Auckland Council experts, including from Stephen Brown re Topic 016 RUB North/West. Also the *Okura RUB Assessment of Landscape, Natural Character and Visual Effects* prepared by Boffa Miskell for Okura Holdings Limited (OHL) dated 20 November 2015. I have read other landscape, design and planning reports and evidence for OHL including of Rachel de Lambert, Studio Pacific and Karl Cook seeking urbanisation of East Okura. I have also read the landscape evidence of Rob Pryor for the Okura Rural

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<sup>11</sup> **Watershed:** *The topographical boundary, such as a ridge or a crest, dividing two adjacent catchment basins.*

Landowners Group seeking urbanisation of West Okura. I have considered the statutory framework, including Part 2 matters and the NZCPS 2010.

9. I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note December 2014. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

### **SUMMARY**

10. The PAUP proposes that urbanisation be excluded from the Okura Catchment through location of the RUB along Vaughans Road above the new Long Bay Structure Plan urban area. I assess the proposed urbanisation for East and West Okura, either side of Okura Village, as per submissions by OHL and the Okura Rural Landowners Group, Bin Chen and others.
11. The PAUP RUB location is along the southern watershed to the Okura Estuary. Draining to and enclosing the important and sensitive estuary, these southern slopes to the Okura Estuary, that reach up to Vaughans Road, are major contributors to the natural character, landscape, visual qualities and amenity values of the Okura. As per NZCPS Policy (1) (f) the landward extent to the Okura Coastal Environment includes the southern slopes up to the watershed, the ridgeline, that is, along Vaughans Road.
12. I note that the Okura Estuary is identified as of particular natural significance, being recognised in the PAUP as of High Natural Character (HNC), as Outstanding Natural Landscape (ONL), having significant ecological value, as well as being separately formally recognised for some 20 years as the Long Bay Okura Marine Reserve.
13. I have reviewed the coastal environment associated with the Okura Estuary with regard to the characteristics and attributes, particularly considering effects on natural character, landscape and amenity.
14. Boffa Miskell and Ms de Lambert assess that adverse effects will variously occur, of high to moderate to low significance from the proposed urbanisation of East

Okura. I concur with Boffa Miskell and Ms de Lambert that significant adverse effects will occur (Attachment 11).

15. Considering the 26 . 30 lots as the baseline for existing residential development on the OHL land, the experience of the Okura Estuary ONL would be transformed by urbanisation adding up to a thousand households.<sup>2</sup> The transformation would affect the ONL in terms of its natural science, its experiential and its associative attributes. As is recognised by the Boffa Miskell assessment, the urbanising of the East Okura lands would adversely affect the wider Okura landscape. That is, the urbanising would undoubtedly affect the ONL. Remedying and mitigating the effects, or balancing adverse effects against potential positive effects - such as good solar access and coastal access - are not methods to be undertaken in this situation. For, as per NZCPS Policy 15 (a), activities resulting in adverse effects on the ONL are to be avoided.
16. Considering the recognised High Natural Character of the lands of Piripiri Bay and the waters of the Estuary below, I have assessed the proposed urbanisation in East Okura. I assess, and, as has been recognised by Boffa Miskell, the urbanisation would significantly adversely affect the perceptual values associated with the naturalness of Okura Estuary. As per NZCPS Policy 13 (b), such effects are to be avoided, and not merely remedied and mitigated as proposed by Boffa Miskell. The Hill, Young and Cooper report (para. 5.21, page 18. August 2013), suggesting that mitigation of effects on the ONL was a solution, is out-dated.
17. My analysis does not support that of Mr Pryor regarding urbanising West Okura. The relocation of the RUB to allow urbanising of West Okura would have significant adverse effects on the outstanding natural landscape and also on natural character of the Okura Estuary.
18. I conclude that the RUB location on the Okura watershed is appropriate to avoid adverse effects on the Okura Estuary ONL<sup>3</sup>, and to avoid significant adverse effects on the High Natural Character.

## NATURAL LANDSCAPE

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<sup>2</sup> Refer Karl Cook Primary Evidence 27 November 2015, Para 6, Page 3

<sup>3</sup> Note. As per King Salmon decision (SC 82/2013 [2014] NZSC 38) where, following landscape architects assessing that a salmon farm proposed on coastal waters would adversely affect the ONL and ONC attributed to the land half a kilometre away, the proposal was to be avoided as per NZCPS Policy 13 (1) (a) and Policy 15 (a).

19. The PAUP addressed the estuary and the coastal edge, including the eroded cliffs and gullies, as an outstanding natural landscape, ONL 51 (mapped in Appendix 3.2 Natural Heritage Overlay). Whilst an estuarine environs, the cliff formations provide an important cue to the inherent instability in the surrounding lands. The landforms provide important legibility in this estuarine landscape.
20. The Okura Estuary ONL 51 laps onto the base of the OHL site on the South Okura slopes. This ONL adjoins ONL 54 which runs over the northern end of Long Bay Regional Park. The Society and OEG submitted that ONL 54 be expanded to include the lands in Piripiri Park as part of the ONL hearing heard several months ago (Attachment 15).
21. I address ONL 51 and note that as well as some of the biophysical and experiential attributes noted in the PAUP, there are important associative attributes that have not been addressed. The historic associations, the shared and recognised values, and the tangata whenua values are of significance and have not been recognised in the brief PAUP summary.
22. The East and West Okura lands that landowners seek be included within the RUB are substantially within the visual catchment of the ONL (map Attachment 13). They are the important southern lands of this estuarine landscape. The naturalness of these lands contributes importantly to the ONL.

## **NATURAL CHARACTER**

23. Both the East Okura and West Okura lands that submitter land-owners seek be included within the Okura RUB are all located within the Okura water catchment. Most of the lands are within the visual catchment of the estuarine waters (Attachment 14).
24. In East Okura adjoining the OHL site, Piripiri Park and Long Bay Regional Park lands to Piripiri Bay below are delineated as of High Natural Character in the PAUP. I recognise that adverse effects of activities on the natural character of the marine, freshwater and terrestrial environments of the coastal environment within the Okura catchment are to be avoided, remedied or mitigated. I also recognise

that significant adverse effects are to be avoided as per NZCPS 2010 Policy 13 (1) (b). I consider this in terms of the medium density urbanisation proposed in the Okura Structure Plan for East Okura and also the urbanisation sought via large lot residential for the lands of West Okura (Attachment 9).

25. I consider the natural character in terms of the terrestrial and marine, both their biotic and abiotic attributes, plus the experiential attributes that contribute to the high natural character and the permitted regime for development on the surrounding lands (Attachment 10).
26. Factoring in this developed baseline, I assess that both East and West Okura exhibit natural elements, processes and patterns that contribute importantly to the natural character of the estuary both in terms of their biophysical and their experiential attributes.
27. For naturalness is appropriately interpreted to include both the natural science dimensions and the dimensions experienced, that is, both a bio-physical and a socio-cultural context. Whilst the natural elements, patterns and processes of a site may be assessed somewhat in isolation in terms of identifying what exists, and its condition, the relationship of a site to surrounding lands, waters and peoples must be part of any assessment. The naturalness of the context or setting<sup>4</sup> for the Okura Estuary is assessed would be reduced through the urbanisation sought.
28. I assess that natural character attributes such as the natural darkness of the night sky<sup>5</sup> would be adversely affected by the urbanisation. Reduced natural darkness can affect natural science aspects associated with the biota associated with the estuary and surrounds, as well as significantly affect the experience of the naturalness of the environs.

## **EAST OKURA**

29. As identified in the Boffa Miskell report (20 November 2015), under the Okura Structure Plan involving removing lengths of streams, substantial earthworks and

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<sup>4</sup> NZCPS Policy 13 (2) natural character may include (h) their context or setting;

<sup>5</sup> NZCPS Policy 13 (2) natural character may include: (e) the natural darkness of the night sky.

residential urbanisation to a medium density on the promontories, notable landscape change would occur.

30. The OHL site extends from the Piripiri Ridgeline and Vaughans Road north to meet the Okura Estuary. It involves a series of spurs and valleys oriented primarily north-west. The Okura Estuary ONL 51 laps onto the base of the OHL lands. The eastern ridgeline boundary to the site adjoins Piripiri Park with lands identified as High Natural Character. Estuarine waters out beyond the site are also identified as High Natural Character.
31. The proposal includes addressing the landuse practices by the current owner that has allowed ongoing degradation of natural stream courses.
32. The proposed urbanisation would involve very substantial earthworks. As noted by Boffa Miskell, to achieve the suburban development the topography would be permanently altered. Some 1.5 km of stream channel would be removed and natural drainage patterns altered. These works would adversely affect the natural land surface and the estuarine environment below is vulnerable changes on the land.
33. Boffa Miskell assess the sensitivity to change and the level of change to be rated from moderate to high. In an effort to reduce the effects on the natural attributes associated with the site, the Structure Plan proposes substantial mitigation and enhancement works to enable the intensive urbanisation to be accommodated.
34. However, as identified by Boffa Miskell, and I agree, the adverse effects are of considerable significance with respect to the ONL and also the HNC. Hence, in terms of NZCPS Policies 13 (1)(a) and 15 (a), such effects are to be avoided, not mitigated.
35. The substantial disturbance involved will have enhancement and mitigation works to offset the effects. Even then, as identified by Boffa Miskell (e.g. para. 7.7), there will be residual adverse landscape effects.
36. Whilst the Structure Plan involves remedying existing adverse effects, such as the farm's effects on streams, and seeking to mitigate some of the additional effects caused by the substantial development proposed, such effects are not to be weighed to provide some form of balance through countering adverse effect. The

assessed need to remedy and mitigate effects is an indicator that the relocation of the RUB would not be appropriate.

37. I recognise that development *per se* is not proposed within the ONL.
38. However the ONL is experienced from the surrounding lands and shores. The OHL development would occupy important spurs that are closely associated with the estuarine landscape. Experienced from the adjoining parks (Attachment 2), from across the estuary, such as from the Okura Bush Walkway (Attachments 3 . 6), or from on the estuarine waters (Attachments 7 . 8), the development would transform the enclosing lands that are an essential attribute of the ONL. The estuary would not be a natural landscape if urbanised to close above its edge, behind a reserve strip.
39. To counter adverse effects the Structure Plan involves increased public space and access. The area of the site delineated as ONL would become coastal reserve and allow for public access, and linking to Piripiri Reserve and Long Bay Regional Park.
40. The site extends to MHWS and a coastal reserve is proposed to enable access. With perhaps a thousand households focussed around this estuarine shore, the potential for adverse effects on the estuarine ecology is significant. People, dogs and cats concentrated alongside the vulnerable ecosystems, moving around the mudflats and sandflats and into the pools and flows, a vastly increased concentration of people intruding into the important and vulnerable marine reserve and reducing the naturalness, is assessed as an adverse effect on the ONL and the HNC.
41. I considered the vulnerability of the shorebirds when roosting and during feeding; the vulnerability of the shallow saline habitats of the muds and sands and rocks to excessive disturbance. Rather than the estuary as a special place to visit, as it is now, it would become the front doorstep to a large community. It is likely a significant attraction for residents to invest or live in Okura. The waters will not be merely looked over, looked at or walked by above MHWS, I would expect the estuary would be explored in all sorts of ways. Whilst mud limits certain access, the shallowness of the waters and accessibility of the estuarine diversity makes this important resource vulnerable to concentrated and ongoing disturbance. As identified by Boffa Miskell (para. 7.21) the natural surroundings to the site are

highly sensitive to change. Yet they also identify (para. 7.20) that with suburbia arriving this environs would be subjected to *“a level of activity previously not experienced or provided for around the Okura River.”* Thus I seriously question the Boffa Miskell assessment (Table 1) that the urbanisation *“would not affect the estuarine environment.”* The limited public access currently available is assessed to assist in preserving the naturalness of the estuary, in terms of the biophysical, the experiential, and, the associative attributes.

42. Boffa Miskell identify (para. 7.22) that experiential attributes, the sensory aspects of landscape and natural character, would be adversely affected to a moderate degree. The memorability of the Okura Estuarine landscape is rated as high in the PAUP. I assess the response by Boffa Miskell to understate the effects of the urbanisation: *“The level of change proposed and its visibility from within the ONL would likely alter the balance between open space and development, which may have an effect on the memorability values”* (Table 1, page 19).
43. Considering the existing consented environment with the 26 . 30 rural houses spread across the several spurs of the site, and comparing that with several hundred houses on each spur, as per the Okura Structure Plan, this would considerably increase the evidence of development. The naturalness of the lands would be lessened. The highly evident development would reduce the naturalness experienced, its memorability, and its legibility.
44. Considering legibility, or expressiveness, I consider Boffa Miskell underrate the effects on this attribute in stating that *“Given the scale of the earthworks likely required, in addition to the level of development, it is likely that these values would be affected to a degree.”* The spurs projecting down from Piripiri Ridge are major contributors to the expressiveness of the lands enclosing the estuarine landscape. With the dispersed houses in rural lots (Attachment 10), the spursqland surface would retain considerable expressiveness. With urbanisation little land surface would remain evident on the spurs and their expressiveness would be very significantly adversely affected.
45. Surprisingly, Boffa Miskell assess that transient values of the ONL would remain unchanged with the urbanisation. From within the estuarine landscape, with the influx of people, their noise and movement would compete with those of nature.

The night-lit urban environs clothing the slopes to the estuarine environs, plus significant associated vehicle movement, would alter the experience of transient values from those currently experienced or those from the addition of only 26 . 30 rural houses. The natural dynamics of this landscape are very important attributes and the urbanisation would significantly affect the experience of these qualities.

46. Extending the Long Bay suburb over Piripiri Ridge and down to the Okura Estuary as is proposed by OHL would not preserve the natural character of the Okura Estuary natural landscape or natural character from adverse effects.
47. I concur with the Boffa Miskell statement para. 7.26) that *~~%The development would alter the ONL's sensory values (or "aesthetic values")~~*. Ms de Lambert identifies (para. 6.13) that in considering the sensory values, the shared values of this landscape, and the sensitivity to change, adverse effects may be ~~%low to moderate+~~. Whilst I consider this an under-rating, the rating of their adversity is irrelevant, as adverse effects are to be avoided.
48. As identified by Boffa Miskell (para. 8.7), the modification of the natural landform that is proposed would affect the perceived naturalness within and around the estuary, including within the nearby high natural character areas.
49. From my analysis, I agree that people within and around the estuary ~~%are likely to experience clear views of much of the development.~~" (Boffa Miskell para 8.7). This is easily evident when observing the lands of the site from within the estuary and across on the Okura Scenic Reserve Bush Walkway. (Photos at Attachments 3 - 6 ) The 1.5 m high hay bales currently dotted across much of the site are tiny in comparison to the houses that are proposed, yet they are clearly evident. The urbanisation will change this landscape from a rural to an urban context. Considering perceived naturalness, this is a highly significant effect. The assessment by Boffa Miskell (para. 8.8) that the change ~~%to suburban development would likely have a moderate to low effect on the perception of natural character associated with the Site~~" is in my opinion a serious under-statement. Nor do I agree ~~%that the development will remain a distant and distinctly separate part of the wider landscape to the estuary and its surrounds+~~.
50. The Boffa Miskell assessment (para. 8.8) is that the urbanisation will result in ~~%natural elements patterns and processes associated with the estuary remaining unchanged.~~" My analysis leads to a contrary view. There will be very substantial

effects on the natural patterns, the natural elements and the processes that intertwine these estuarine waters with the lands above. The extensive physical change to the land and freshwater management, as well as the population change and its direct effects within the estuarine environment, will significantly affect the natural character of and experienced in the estuary.

- 51. The experience of the naturalness of the estuary, whether in overview or from within, would be affected by the urbanisation close by. The wildness of this estuary would be affected. The plethora of structures would undoubtedly lessen the naturalness perceived.
- 52. Surprisingly Ms de Lambert contends (para. 6.21) that *any effect on the ONL will be confined to specific sensory attributes*". The effects biophysical effects and the effects on associative values have been ignored.
- 53. Boffa Miskell contend (para. 8.10) that any effects on the biophysical values of the High Natural Character areas would be avoided. I question this. Ms de Lambert identifies (para. 6.18) that the biophysical attributes would be enhanced, which is not of relevance.
- 54. The proposed urbanisation would undoubtedly significantly adversely affect the bio-physical, the experiential and the associative attributes of the Okura Estuary ONL.

## **WEST OKURA**

- 55. Mr Pryor assesses (para. 4.4) the RUB to be currently located on a ~~minor~~ ridge+. That it is a distinct landform unit (refer Attachment - Landform Components, Lucasq evidence Topic 019, Outstanding Natural Landscapes), that it had been previously assessed as a significant natural feature in itself (Brown for NSCC), and that it forms the watershed between the Okura Estuary and open coast catchments, all these factors appear to have been ignored.
- 56. Mr Pryor assesses (para. 4.4) the Okura Estuary ONL will not be adversely affected by urbanisation of West Okura from ridgeline to shore via 1 acre lots as per the map attached to submission #2235 from the Okura Rural Landowners

Group). Mr Pryor assesses (para. 4.6) whether, with the large lot urbanisation, the Okura area will remain a transitional landscape between more urban southern areas and more natural northern areas. In my opinion that is not the test. The Okura Estuary and its landscape have been identified as exhibiting outstanding natural values. The requirement is to avoid adverse effects on this landscape, including through any reduced naturalness. The densification of development, from 4 ha to 4000 sq.m. lots, thus a potential increase of hundreds of houses, would have significant adverse effects on the estuary ONL.

57. Mr Pryor assesses that the urbanisation of West Okura means the landscape values would not be ~~significantly diminished~~. However the lands he is assessing for urbanising are closely associated with the Okura Estuary ONL. The urbanising would change the experience of the inner estuary landscape. The tidal estuarine flats and marginal habitats, the river through, the Scenic Reserve immediately opposite are all core features of the ONL. Experiencing the estuary and the reserve involves experiencing the important naturalness of the Okura West lands that enclose to the south.
58. The complex terrain, vegetation and low density of existing buildings means that these western lands display considerable naturalness. The Okura catchment is experienced as having very considerable naturalness in the context of being increasingly close to urban lands over the ridge.
59. With a density of 4000 sq.m. sites in this complex terrain, urbanisation of these western lots would involve some land disturbance, increased built coverage, hard surfaces, run off and people would cumulatively affect the naturalness of this important estuarine landscape. Various houses would be ~~on show~~ to, around and across the inner estuary. As well as physically reducing the naturalness, the experiential and associative landscape attributes of the ONL would be significantly adversely affected by introducing a residential zone across these western lands. The degree of naturalness and ruralness would be significantly reduced. This would impact on the perceived naturalness of the ONL and of the natural character of this coast.
60. Mr Pryor's proposal (para. 6.3) that the estuary be used as a ~~natural transition~~ between the urban and the natural reserve lands to the north is contrary to the statutory mandate. Mr Pryor has discounted the natural values of the estuary and

ignored the High Natural Character and ONL that is recognised in this area he proposes as a transition to absorb the effects of urbanisation.

61. I assess that the western urbanisation sought would significantly adversely affect the experience of the High Natural Character that is recognised in the Okura Estuary. The RUB criterion of urban contiguousness cannot be considered in isolation of consideration of the identified natural character and landscape resource. The RUB criterion of a defensible boundary explicitly states *based on water catchment boundaries, visual catchment boundaries,...*. Mr Pryor (para 6.11) ignores these aspects that the proposal is entirely inconsistent with. The coastal margin boundary he suggests as the RUB is within the water catchment, and within the visual catchment, to an important and sensitive natural feature and landscape (see Attachments 13 and 14).
62. My Pryor ignores the importance and vulnerability of the Okura catchment, physically and experientially in proposing the actual estuary margin be the urban boundary (Attachment 14). In my opinion this would be inappropriate and contrary to s. 6 a, b and c; NZCPS Policies 13 and 15; and, the strategic planning intent of the PAUP.
63. The Okura River Estuary environment would be significantly adversely affected in terms of its natural landscape and natural character through urbanisation of these western lands.
64. Considering the Okura Estuary ONL, I assess that large lot residential development in the Okura West coastal environment would have adverse affects. As the ONL would be adversely affected, the potential for adverse effects to be mitigated is not the requirement. As per NZCPS Policy 15 (a), such effects are to be avoided. Due to the adverse effects on the ONL that would result, I assess the relocation of the RUB in the west to be inappropriate.

## CONCLUSIONS

65. The Okura Estuary is of considerable importance for natural landscape, natural character and ecology. It is a sensitive environs. The PAUP recognises the importance and the need to preserve and protect this resource from inappropriate activity. Appropriately recognised as an ONL, adverse effects on this outstanding natural landscape are to be avoided. With associated lands and waters recognised

as having high natural character, significant adverse effects on the natural character are to be avoided.

- 66.** The proposed relocation of the RUB to the Okura estuarine margin and resultant urbanisation of the east and/or the western lands, would have significant adversely effects on the Okura Estuary ONL, and on the high natural character.
- 67.** For such effects to be avoided, as is required by NZCPS Policies 13 and 15, the additional urbanisation would not be appropriate. In landscape and natural character terms, where currently proposed, the RUB on the watershed is a very appropriate location.



## Graphic Attachments

O K U R A

Di Lucas

*18 December 2015*



Aerial image from Google earth. Imagery date: 11/5/2015



- 1 Photopoint location
- PAUP RUB

## Attachment 1 Okura Photopoints

Di Lucas 18 December 2015



Okura Photopoint 1



Okura Photopoint 2

## Attachment 2 Views from Long Bay Regional and Piripiri Parks



Okura Photopoint 10



Okura Photopoint 7

### Attachment 3 Views across to East Okura

*Di Lucas 18 December 2015*



Okura Photopoint 8



Okura Photopoint 9

## Attachment 4 Views across to East Okura

*Di Lucas 18 December 2015*



Okura Photopoint 6



Okura Photopoint 5

## Attachment 5 Views across to East Okura

*Di Lucas 18 December 2015*



Okura Photopoint 4



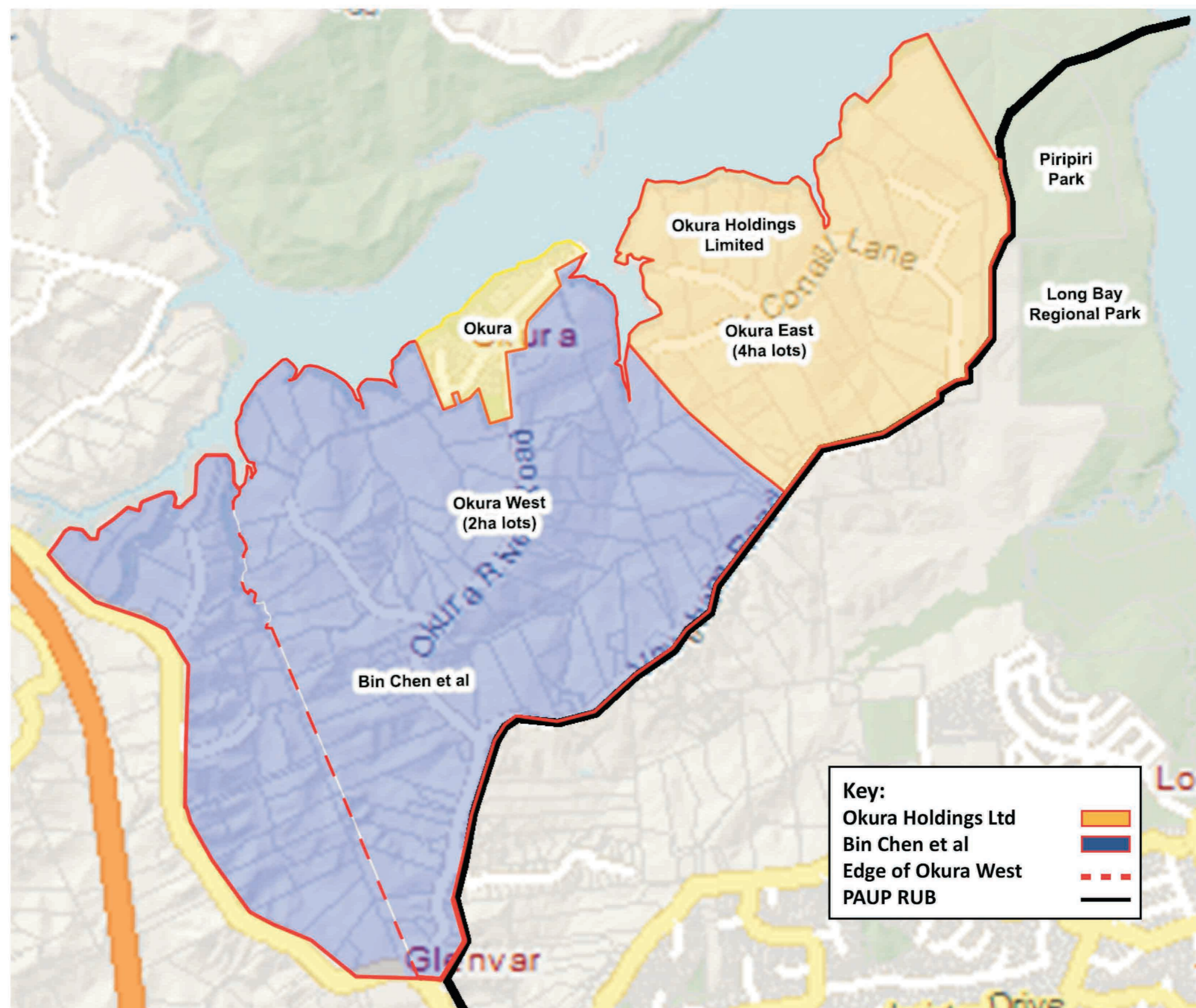
Okura Photopoint 3

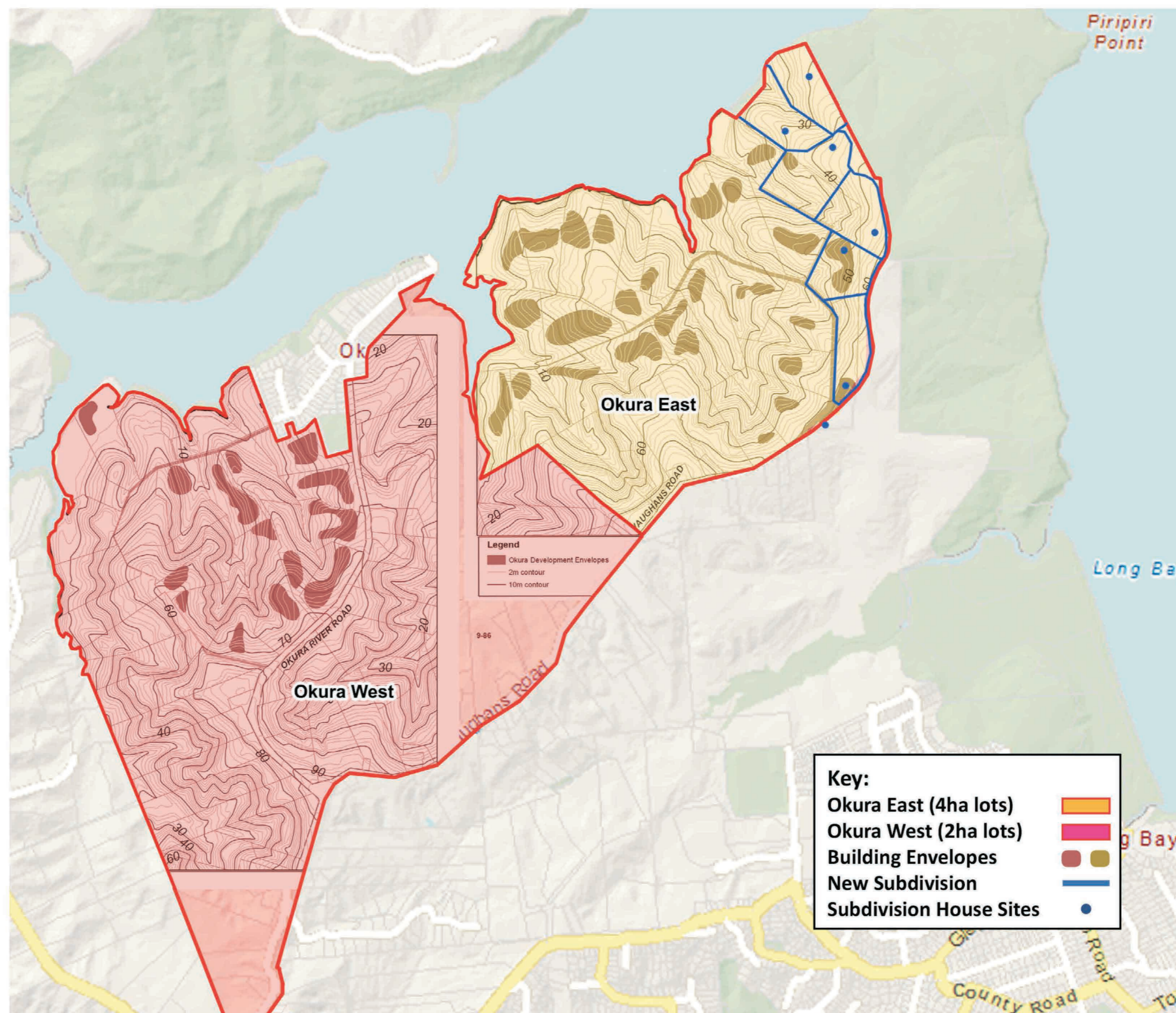
**Attachment 6 Views across to East Okura**

*Di Lucas 18 December 2015*



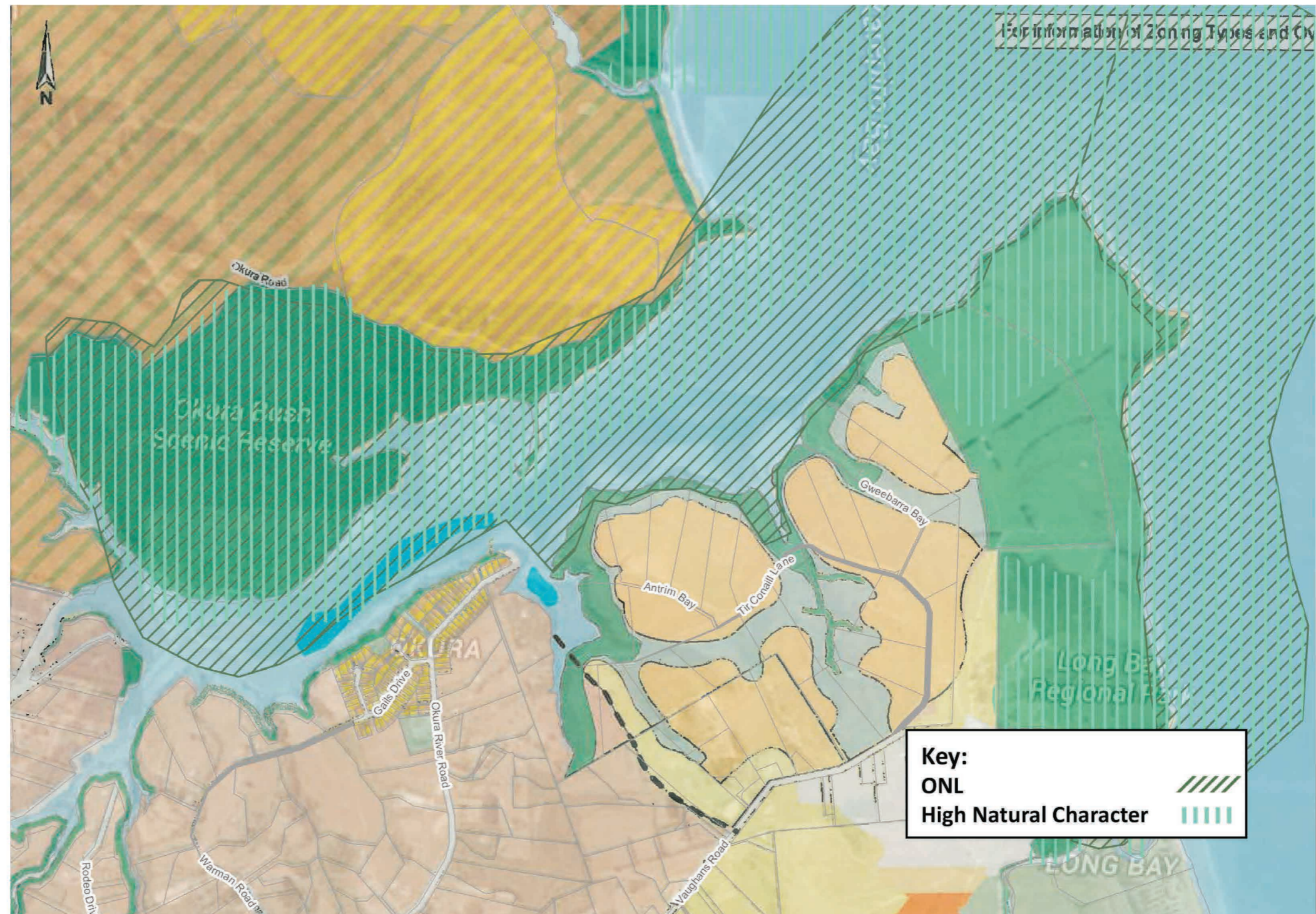




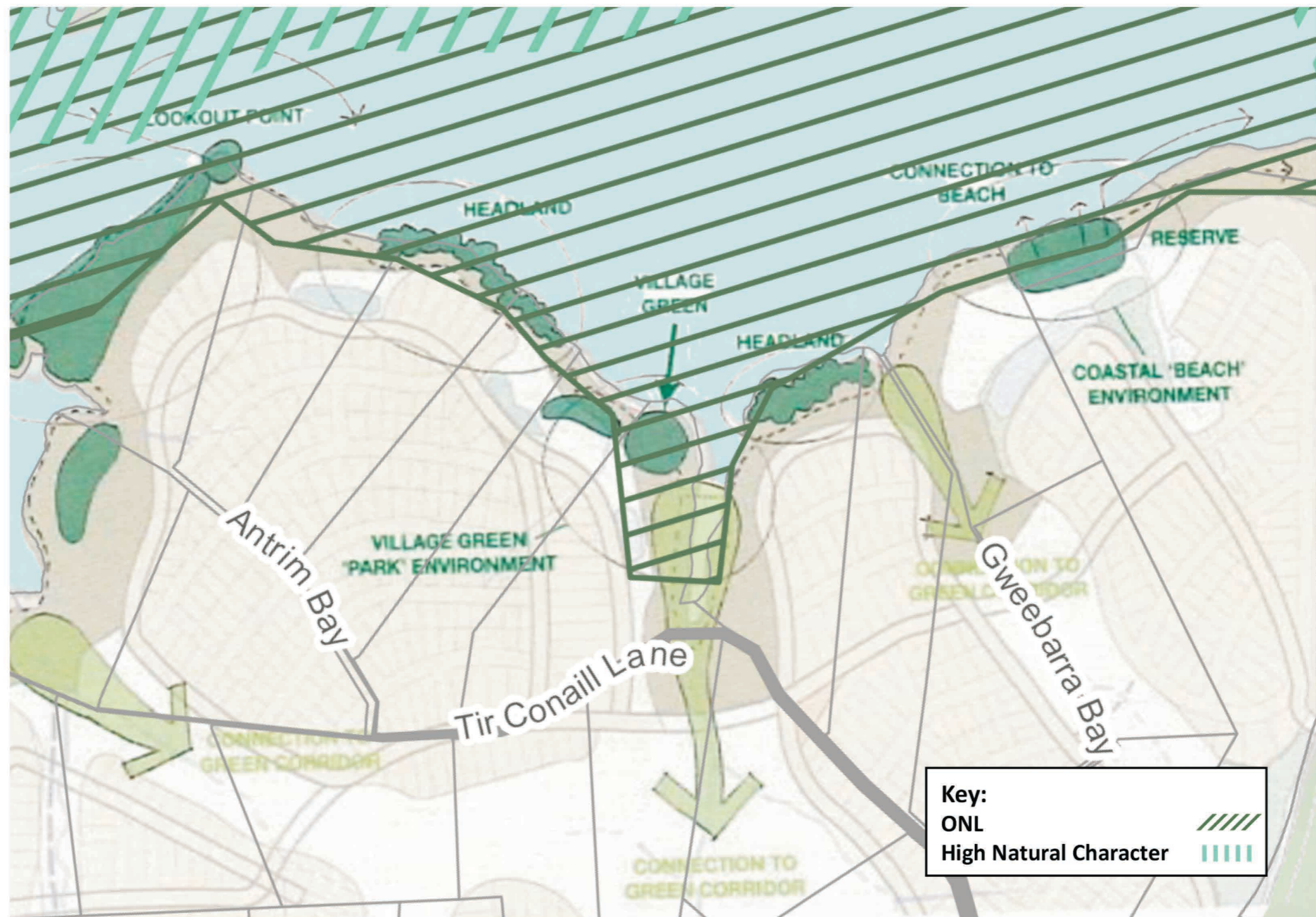


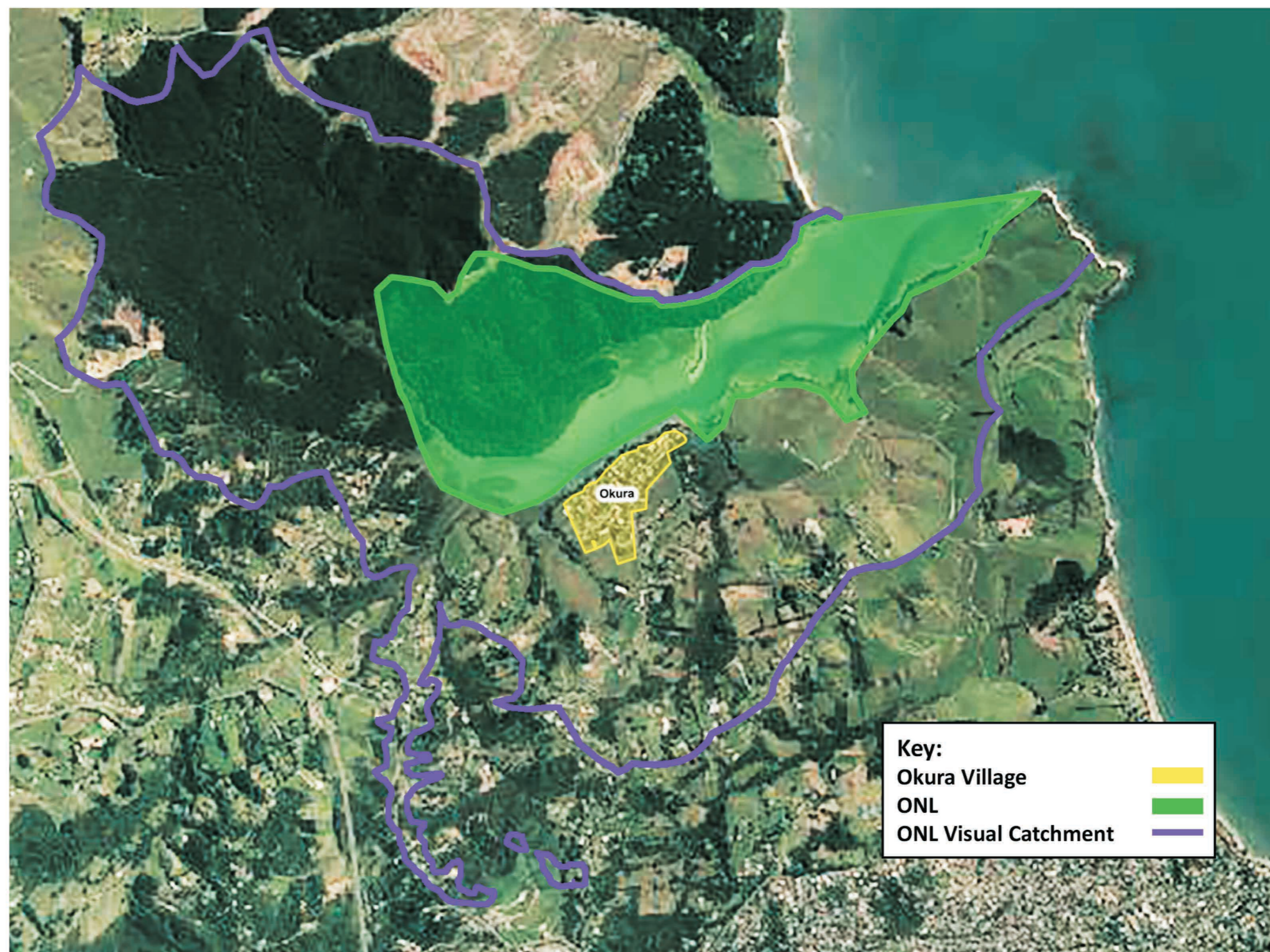
## Attachment 10 Operative Building Envelopes

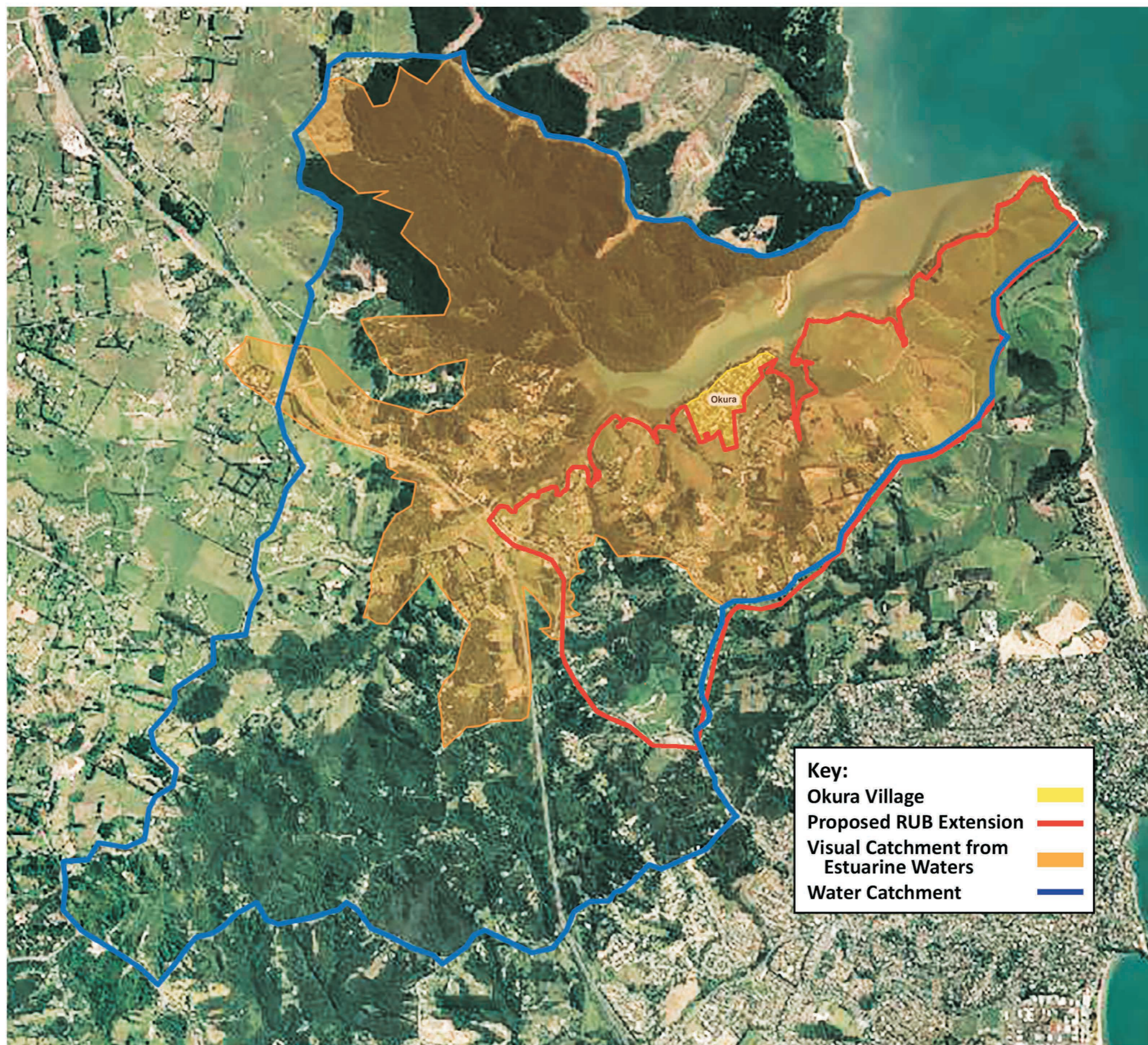
Di Lucas 18 December 2015



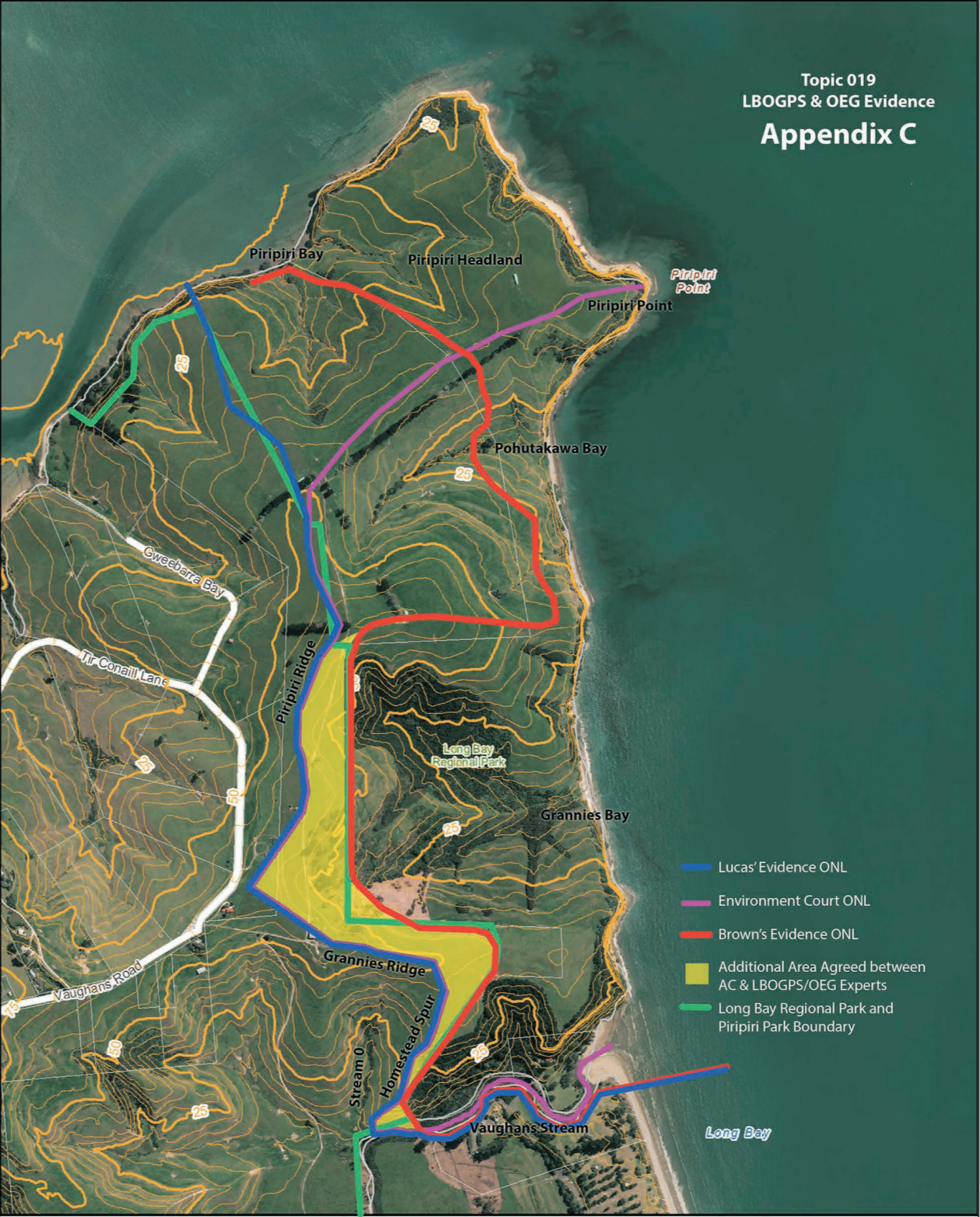
## Attachment 11 OHL Proposed Development and ONL & High Coastal Character Areas







**Attachment 14** Visual Catchment from Estuarine Waters



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Long Bay Contours



**Auckland Council**  
Te Kaunihera o Tāmaki Makaurau

Created: Tuesday, 9 June 2015, 8:55:05 p.m.

Scale @ A3 1:8000