

**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 016 RUB North and West, and
Topic 17 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 STEPHEN KENNETH BROWN ON
BEHALF OF AUCKLAND COUNCIL (LANDSCAPE)**

17 December 2015

INTRODUCTION

1. My name is Stephen Kenneth Brown. I hold a Bachelor of Town Planning degree (majoring in sociology) and a post-graduate Diploma of Landscape Architecture. I am a Fellow and past president of the NZ Institute of Landscape Architects. I have practised as a landscape architect for 33 years. My qualifications and experience are described in my Evidence in Chief (**EIC**) for Topics 16 and 17 addressing proposed Rural Urban Boundaries North / West and South, and this rebuttal statement has been prepared in conformity with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014.
2. It addresses matters raised in relation to Topic 016 RUB North/West and Topic 017 RUB South and, more specifically, the evidence on behalf of submitters addressing the following locations:
 - **Crater Hill, Puhinui Peninsula RUB** – Self Family Trust and Lake Brunner Lodge: Ltd evidence prepared by Rachel de Lambert, Dennis Scott, Jonathan Maplesden and Rachel de Lambert.
 - **No.s 47, 51 & 57 Otanerua Rd, and part of 203 Weranui Rd, Hatfields Beach** – Otanerua Property Holdings Ltd, Soft Technology JR Ltd, Edward Henderson Family Trust and Kauri Orewa Ltd: evidence prepared by Jan Woodhouse, Jeffrey Brown and Stephen Skelton.
 - **Warkworth North (Sandspit Rd)** – ‘various ‘dairy farmers, beef and sheep farmers, rural lifestyle landowners on a variety of lot sizes, and landowners within or on the edge of FUZs located in Warkworth, Snells Beach and Sandspit’, as described by Karen Pegrume at section 2.1 of her statement (7371): evidence prepared by Karen Pegrume.
 - **124 Mahurangi East Rd and Brick Bay, Snells Beach** – Karen Bartlett and Brick Bay Trustee: evidence prepared by Karen Bartlett and Lance Hessel.
3. In the following sections I address the landscape evidence pertaining to these different locations. My statement does not cover submissions where Council and submitters are largely in agreement or where there has been either no response, or a very limited response, to my EIC.

CRATER HILL / NGA KAPUA KOHUORA

Evidence Of Dennis Scott

4. At paragraph 69 of his statement, third bullet point, Mr Scott asserts that:

“The quarrying as an existing land use does affect the current overall integrity of the Crater Hill landscape. It is nonsense to try and tease these elements as some sort of a now expressive engagement by passing motorists who, only receive a fleeting view into the Crater Rim and lake.”

5. At Bullet Point 7 he also states that:

“..... in my opinion, the SFT pastoral management regime is a critical factor in establishing and maintaining the current ‘aesthetic’ quality of the subject landscape. I emphasise this reference as Mr Stephen Brown idealises the ‘bucolic outlook’ from the Manukau Memorial Gardens In addition, the SFT has taken a high profile in both supporting and investing in appropriate research to assist with both geological and archaeological preservation measures.”

6. In response to these points, I can only reiterate the point made in my EIC that the view from SH20 is the main point of public interaction and engagement with Crater Hill / Nga Kapua Kohuora at present. This is clearly depicted in Annexure 5 of my EIC for Topic 17. Furthermore, the former quarry site occupies a key part of the visual field – embracing the tuff ring, its inner walls, lake area and crater floor – that are exposed to passing motorists. This is not “*nonsense*”; it is simple reality.

7. Turning to the issue of my ‘idealisation’ of the views from the Papatoetoe section of the Manukau Memorial Gardens, ‘bucolic’ simply refers to an outlook beyond the northern margins of the cemetery that remain ‘green and verdant’: combining the stream margins of part of the Waokauri Creek system with the rising slopes of the crater periphery and rim. In this respect, there is an attractive synergy between the Memorial Gardens and the rural aspect of Crater Hill. Mr Scott may not like my terminology, but I can’t find a suggested replacement for my description of this relationship. Instead, his evidence immediately turns to SFT’s

support of geological and archaeological investigations, which is quite a different matter.

8. Much of Mr Scott's evidence also focuses on comparison between my EIC and a 2001 statement that I prepared for the Environment Court addressing the fuller range of volcanic, coastal and landscape features stretching from Puhinui Creek to Puketutu Island. Yet, at that time:
 - I had not been involved with detailed evaluation of the Puhinui Peninsula landscape and Southern Gateway Consortium 'site', as I have been over the last two years;
 - I had not been involved with the mapping of cultural heritage links and associations for Te Akitai and Auckland Council, as I have over the last year;
 - and the Manukau Memorial Gardens – immediately south of Crater Hill – did not exist.
9. Looking at Mr Scott's commentary on my 2001 evidence, with the benefit of hindsight, I can only reiterate that many of the comments in that evidence highlighted by Mr Scott are still applicable and appropriate. Crater Hill is not a 'cone' in the sense that Mt Eden, One Tree Hill or even Mangere Mountain are. Yet it remains one of the 'lynch-pins' in an important sequence of volcanic features and remnants, most of which have been either lost or seriously degraded since the European occupation of Auckland (**Annexure 1**). Furthermore, the very subtlety of Crater Hill's landform makes conservation of its landform very problematic from both geomorphological and landscape standpoints.
10. It is also important to remember that Crater Hill / Nga Kapua Kohuora has been identified as an Outstanding Natural Feature (**ONF**): not because it is an outstanding visual feature or landscape, but – like most other proposed ONFs – because of its geophysical characteristics and gestation, and its related scientific and educational value. This does not preclude many features also enjoying a degree of public appreciation because of their prominence, value as local landmarks, and other landscape or amenity values, but these are not the primary reasons for identification of Crater Hill as an ONF. In addition, the cone has

important associations for Te Akitai: it is the site of former areas of habitation, gardening and food gathering, while both of the historic portage routes from the Tamaki River to the Manukau Harbour closely skirted the cone.

11. The sort of values that I have just described overlap with, but are not exactly the same as, those commonly associated with the identification of ONLs. Indeed, proposed RPS Policy 1 (Chapter B4.3.2) reinforces this by listing the following values and characteristics that are associated with ONFs:

- a. the extent to which the landform feature or geological site contributes to the understanding of the geology or evolution of the biota in the region, New Zealand or the earth, including type localities of rock formations, minerals and fossils*
- b. the rarity or unusual nature of the site or feature*
- c. the extent to which it is an outstanding representative example of the diversity of Auckland's natural landforms and geological features*
- d. the extent to which the landform, geological feature or site is a component of a recognisable group of geologically associated features*
- e. the extent to which the landform, geological feature or site contributes to the value of the wider landscape*
- f. the community association with, or public appreciation of, the values of the feature or site*
- g. the potential value of the feature or site for public education*
- h. the potential value of the feature or site to provide additional understanding of the geological or biotic history*
- i. the state of preservation of the feature or site*
- j. the extent to which a feature or site is associated with an historically important natural event, geologically related industry, or individual involved in earth science research*
- k. the importance of the feature or site to Mana Whenua*
- l. the contribution of the feature to the more publicly valued groups of landforms and geological sites associated with Auckland's volcanoes, coastlines, Hauraki Gulf islands, and the Waitakere Ranges.*

12. These are clearly not the same factors as the more commonly understood, WESI and Modified Pigeon Bay factors that are commonly applied to the identification of ONLs, although there are areas of convergence between the two. While the division between ONLs and ONFs has only become more apparent, at least in terms of statutory documents, over the last decade, it is nevertheless clear that the two have to be addressed in a manner that recognises their differences. A very clear example of this is Auckland's main volcanic cones: although sharing

the visual primacy and aesthetic characteristics associated with many ONLs, the Isthmus cones are simply too modified and afflicted by surrounding development to qualify as Outstanding Natural Landscapes. Quite simply, they are not sufficiently 'natural'. Yet, they remain outstanding examples of monogenetic volcanoes and, together, comprise an internationally recognised, field of such features.

13. In this context, it is particularly noteworthy that nearby Pukaki Crater is more expressive as a visual feature, but its value as both a legible feature and, to a certain extent, as a geomorphological feature, has been severely eroded by incremental residential development:
 1. around its north-western to north-eastern crater periphery;
 2. along the crest of the northern and western sides of the crater; and
 3. inside part of its eastern tuff ring.

14. Returning to Crater Hill, it is clear that it does not have the visual signature or degree of presence associated with the likes of nearby Mangere Mountain or any of Auckland's other major cones. Nevertheless, it remains a largely intact ONF, and its articulation as such is clearly assisted by the limited level of built development both within its crater and across its flanks (**Annexure 2**).

15. Looking therefore to the future of Crater Hill, Mr Scott starts to discuss the pattern of development that he sees as being appropriate for the ONF at his paragraph 74. In particular, he refers to his Attachments 16 and 17, which show roughly two-thirds of Crater Hill's crater area, lake, and rim retained as a future reserve, while a narrow strip of land next to Waokauri Creek is also identified as "*Potential Reserves*". However, the same plans also show most of the Crater Hill's external slopes and roughly one-third of its 'internal crater' – focused on the former quarry site – subject to development as "Potential Settlement". In effect, most of the ONF's external circumference would be subject to residential development, along with a sizeable proportion of the crater wall and floor.

16. Mr Scott further indicates at his paragraph 75 that the process of development would involve a "design-led programme" that is 'inclusive of consultation with Te Akitai (correct spelling) and application of the Te Aranga Principles.

17. Regardless of how 'design-led' this process is, it would effectively isolate the main tuff ring and inner crater from Waokauri Creek, Tidal Rd and the Memorial Gardens, while the internal area of the crater would be dominated by multi-level development across the southern third of the tuff ring floor. Mr Scott's proposals would fragment Crater Hill, both internally and externally – going beyond the sort of damage already wrought to Pukaki Crater (**Annexure 3**) by also covering a large proportion of Crater Hill's volcanic floor with residential development. Together with development across the southern crater rim, and around most of the tuff ring's circumference, this would effectively destroy Crater Hill as a geomorphological feature.
18. The location of residential development within an elongated triangle that follows SH20 would also isolate the volcanic feature from its main point of contact with the regional community. Although the reserve within the crater would clearly accommodate use and interaction with the ONF at a quite fine-grained level, most people's engagement with the feature would be via the 'fleeting views' that Mr Scott has referred to. In fact, the human mind is quite capable of assimilating large amounts of sensory information very rapidly, and even though Mr Scott is clearly disparaging of this public 'connection', it will remain highly important in terms of the wide community's exposure to Crater Hill for the foreseeable future.
19. For iwi, the proposed scope and pattern of development would also destroy any real sense of connection and association with both Waokauri Creek and Pukaki Marae. Although a 'design-led' approach to the ultimate development of Nga Kapua Kohuora includes the prospect of consultation with "Te Akatai", Mr Scott's Attachments 16 and 17 suggest that much of the conceptualising and design has already been completed. In this context, the narrow 'gateway' between Nga Kapua Kohuora's crater rim and Waokauri Creek – as foreshadowed by Mr Scott's Attachment 16 – makes no sense: it would achieve little in relation to the remnant cone's value to tangata whenua and it is meaningless in terms of the cone's integrity as an ONF.
20. South Auckland's wider network of volcanic features – including Puketutu Island, Otuataua, Maungataketake, Pukaki Crater, McLaughlins Mountain / Matukutureia, Matukutururu and Kohuroa (my EIC, Topic 17: Annexure 6) – has

been dramatically affected by post-colonial occupation, to the point where very few remnants still provide a sense of connection with this key aspect of the area's natural heritage. I therefore consider it absolutely critical that Crater Hill is protected from the scale and extent of development promulgated by Mr Scott. Such an approach can only exacerbate the fragmentation erosion of values that has so afflicted virtually all of South Auckland's volcanic field to date.

Evidence Of Jonathan Maplesden

21. At paragraph 7.2.3(a) Mr Maplesden states that “..... *No-one to my knowledge has ever suggested “housing or other development” within or even near the tuff ring ridge*”. In response to this statement, I have to say that I am somewhat confused. Mr Scott's Attachments 16 and 17 clearly show “*Potential Settlement (43.21 Ha)*” along the outer lip of the entire tuff ring, then traversing the crater rim near SH20 and the Manukau Memorial Gardens to accommodate development within the tuff ring next to SH20. This development would almost completely obscure current views into, and across, the crater from SH20 (my EIC, Topic 17: Annexure 5). A dark grey road or portion of the Area of Potential Settlement also appears to traverse the very crest of the crater rim. This appears to completely contravene Mr Maplesden's assertion.

Evidence Of Rachel De Lambert

22. Ms de Lambert's evidence, like that of Mr Scott, generally supports the idea of Crater Hill being brought within the RUB and at paragraph 1.9(b) of her statement, she states that:

“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.”

23. Before exploring those ideas a little further, it is also important to note that at paragraph 1.9(c) Ms de Lambert agrees that Crater Hill should be an ONL – a matter that Mr Scott seems to equivocate over. At paragraph 5.4 she therefore goes on to quote from my EIC (paragraph 9) where I explain the importance of

Crater Hill, both as a volcanic feature in its entirety, and also in terms of specific features, such as its intact external walls, Selfs Lava Cave and the Underground Press Lava Cave.

24. Turning, therefore, to the matter of future development in the vicinity of Crater Hill, Ms de Lambert supports the idea of light industrial development extending across the Tam land (her Appendix 3: Mapping of Crater Hill ONF). Thus, at her paragraph 6.3 (c) she expresses the view that:

“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....”

25. She supports this view by stating that the development will not impinge physically on the crater landform and the crater will remain visually on axis with Tidal Rd. I agree with Ms de Lambert in part. Referring to her Appendix 3, it is my opinion that:

- Firstly, the ONF is appropriately identified – extending to the hedgerow identified by Ms de Lambert that is aligned with Portage Rd.
- Secondly, as is apparent from looking at Ms de Lambert’s Viewpoint 3 photo and my **Annexures 2** and **4**, the profile of the ONF is quite ‘soft’ and low lying. It rises gradually from the margins of Waokauri Creek to a crater rim that is only 27m asl. This means that the profile of the crater is highly sensitive to any sizeable or bulky intervention and screening by buildings, signage and other structures close to the road corridor.
- Thirdly, the interface of new development with the existing residential area across Tidal Rd also needs to be acknowledged. Ideally, there should be some complementarity about that development – both in terms of the interaction between activities both sides of the road, but also bearing in mind the manner in which it frames views down the road axis to Crater hill (**Annexure 4**).
- Finally, the finger of Waokauri Creek that approaches Tidal Rd should retain some visual presence in relation to that road and the residential properties that line it.

26. Taking these various factors into account, it is my view that it would be appropriate for light industrial development to extend as far south as the creek finger that touches the edge of Tidal Rd's corridor, but that residential development would be preferable extending from that creek margin through to the ONF boundary. Portage Rd, and an extension to it, could provide the interface between this development and the ONF, as well as providing public access to both the crater reserve and Waokauri Creek's margins.

HATFIELDS BEACH

Evidence Of Jan Woodhouse – General

27. Ms Woodhouse has prepared three statements of evidence that address the Hatfields Beach coastal area and physical catchment. All three statements contain material that overlaps to a considerable degree, with much of it addressing ONL44. Ms Woodhouse's application of the WESI / Modified Pigeon Bay criteria underpins much of this assessment and she is unstinting in her criticism of ONL44 as it applies to Hatfields Beach. Thus, in her statement on behalf of the Edward Henderson Family Trust (7029 and FS 139), she attacks 'my' identification of the ONL for a wide variety of reasons (paragraphs 98 – 108 in particular), including because of patches of pasture, gorse and – next to SH1 – revegetation and regrowth. The presence of kikuyu in the pasture below the bushline near ONL44 and the Otanerua Stream is also raised as an issue, while the potential for 'slips and slumps' on areas of pastoral management is mentioned at paragraph 105 as being problematic.
28. Many of the matters raised by Ms Woodhouse reflect changes that have occurred to the coastal landscapes of northeastern Auckland since the inception of the last regional landscape review in 2001. In fact, ONL44 was first identified by Rachel de Lambert and myself in either late 2003 or 2004, working in conjunction with Prof. Simon Swaffield, John Goodwin and others. Consequently, many of the modifications that Ms Woodhouse now rails against – including the decline in pastoral health, the incursion of the Northern Tollroad, and subdivision near Hillcrest Rd – have all occurred since that initial identification of ONLs across the

Auckland Region. Even so, issues like the exact composition of the forest canopy and grass sward, have probably not featured in too many strategic landscape assessments, while the regrowth around the Northern Tollroad / SH1 is such that I am now rather less concerned by that development than by the effects of more sporadic, rural-residential subdivision closer to both Hillcrest and Otanerua Roads. Moreover, the inclusion of a relatively small area of pasture south of the Otanerua Stream within ONL44 back in the mid 2000s simply reflected a logical connection between the greater bulk of ONL44 north of Hillcrest Rd and a small part of the same ONL south of that road – focused on the mature forest and escarpment landform of Alice Eaves Scenic Reserve.

29. In my view, Ms Woodhouse tends to focus on a number of quite fine-grained details in her ONL review, but loses sight of the bigger landscape picture. This can be more readily appreciated with reference to the description of ONL44 in Appendix 3.2 to the PAUP:

ONL Description				WESI Criteria							
Schedule	Name	Location	Landscape Type, Nature & Description	Elements, Patterns, Processes	Natural Science Factors			Aesthetic Values		Expressive ness	Transient Values
					Geological Topographical	Ecological	Dynamic	Memorability	Naturalness		
44	Mahurangi - Waiwera	North-east Rodney	<p>Hill country Wild nature/ cultured nature (Hill country) Wild nature/ cultured nature (Estuary) Wild nature (Coastal)</p> <p>A very distinctive, even 'signature', coastal landscape (at the regional level), combining the deep river valleys of the Puhoi and Waiwera Rivers, together with other enclosed coastal estuaries that feed into the Hauraki Gulf. Framed by a dramatic sequence of headlands, sedimentary cliffs, coastal ridges, and native forest extending well inland. Also includes mangrove colonies and a</p>	Coastal and hill country landforms with remnant indigenous vegetation and pattern of pasture reinforcing topography.	<p>Very high</p> <p>Very extensive sequence of incised stream valleys extending down to the Mahurangi Harbour, including a sequence of dramatically cliffed headlands and bays, together with forested ridges and slopes that strongly define the Waiwera and Puhoi River</p>	<p>High</p> <p>Extensive sequence of mature remnant native forest intermixed with pasture, together with stream corridors leading down to shallow bays and extensive mangrove colonies. Includes enclosed water areas of both rivers – culminating in Wenderholm Regional Park.</p>	<p>Very high</p> <p>Very dramatic sequence of terrain and extensive remnant forest interacting with, and framing both local stream valleys and the Puhoi / Waiwera Rivers, including the prominent headland of Wenderholm Regional Park and Mahurangi Heads.</p>	<p>Very high</p> <p>Very clearly articulated sequence of hill and river valley topography combined with forest remnants and natural coastal margins to create a very clearly structured and patterned hill country and harbour landscape. The whole landscape has a strong endemic signature.</p>	<p>High</p> <p>Amalgam of forest remnant stream corridors, coastal margins and mangrove colonies linked to harbour and the Hauraki Gulf. Very strong sense of structure and sequence both physically and perceptually.</p>	<p>Very high</p> <p>Signature Auckland landscape combining key elements of bush, coastal fringe, enclosed harbour with streams / river and bush clad escarpments.</p>	<p>High</p> <p>Interplay of land, estuaries and the open waters of the Hauraki Gulf, including variation resulting from atmospheric conditions, time of day / year, tide and wildlife. Wading and sea birds prevalent.</p>

			patchwork of open pasture.							
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30. Perhaps more important, however, is the layering of features that are described in my EIC, which Ms Woodhouse seems to dismiss, including:

- The main body of mixed broadleaf and kauri / tanekaha forest spread across the main (western) ridges that forms the primary backdrop to Hatfields Beach, in conjunction with the clearly defined, hill / ridge landforms that separate most of Hatfields Beach from both the SH1 / RAP21 and Waiwera River catchments (**Annexure 5**).
- The merger of that sequence of forest with a large body of mature forest on the south side of the Hillcrest Rd ridge and its escarpment together with an even more extensive forest catchment (RAP21) that extends towards Halls Hill, either side of SH1.
- The cliffed coastlines at both ends of Hatfields Beach that frame the main beach area next to the Hibiscus Coast Highway.
- The culmination of both coastal escarpment sequences in two major headlands: one separating Hatfields Beach from Orewa and the other merging with the Waiwera Hill Scenic Reserve to demarcate the southern edge of the Waiwera River and Estuary.
- The Hatfields Beach beachfront next to the Hibiscus Coast Highway, merging with a tidal estuary and both the Otanerua Stream and a second stream catchment that stretches northwards, towards Waiwera.
- The layering of coastal forest and open pasture across the slopes around both the estuary and streams that feed into it – extending towards both SH1 and Waiwera (**Annexure 6**).
- The increasingly steep and incised sequence of ridges – often crested by native bush – that also mark the climb towards the ridge crests separating Hatfields Beach from Waiwera.

31. Of these catchments and landscape features, it is the main spine of ridges and associated native forest framing Hatfields Beach from west to north (part of ONL44), together with the beachfront and sequence of northern coastal escarpments – culminating in the Waiwera Hill Scenic Reserve – that are most important from a landscape standpoint. I agree with Ms Woodhouse that the

recent residential development between Hillcrest Rd and Otanerua Rd has compromised the values of this catchment (her paragraph 23: evidence for Otanerua Property Holdings Ltd - 5832), but the sequence of landscapes otherwise described remains intact, legible and highly significant.

32. Consequently, in looking at Hatfields Beach as a whole, I stand by paragraph 37 of my EIC, where I stated as follows:

“37. Currently, Hatfields Beach offers the impression of being a gateway into the mixture of rural, coastal and natural landscapes of the former Rodney District. Sporadic development within the catchment would remove or seriously erode this gateway and the related sense of transition from ‘town’ into ‘country’. It would also compromise the values of the adjoining ONLs, both within and outside the coastal environment. The twin ‘arms’ of ONL44 would lose much of their current sense of naturalness, while their expressiveness, aesthetic value, even identity, would also be significantly compromised by the intrusion and encroachment of residential development in prominent locations that have a high degree of visual presence relative to the Hibiscus Coast Highway, main beachfront and small domain at the southern end of the estuary. Such changes and effects would have a direct bearing on the implementation of NZCPS Policies 13 and 15.”

33. I also note that none of Ms Woodhouse’s clients have challenged ONL44 under Topic 019, and even though she strongly criticises the ONL, Ms Woodhouse has avoided applying that criticism by way of a redefined or remapped ONL. In a related vein, she does not refer to Policy 15 of the NZCPS or assess the implications of further residential development on the Coastal Environment. In this context, I need to reiterate that my EIC identified those parts of Hatfields Beach considered to comprise part of the Coastal Environment, and it also identified an Area of High Natural Character value in the vicinity of Waiwera Hill. Mr Jeffrey Brown has criticised this delineation, stating at paragraph 3.14 that the Coastal Environment should be confined to:

- *“..... the Otanerua Stream tidal estuary and coastal wetland (with margins to the west of the old highway”*

- “ low lying land adjacent to the estuary area that would be at risk from coastal hazards, including coastal flooding, sea level rise and tsunami”
- an area of coastal vegetation defined by Mr Ussher; and
- other areas defined by Mr Skelton.

34. I have also reviewed the Coastal Environment line proposed by Stephen Skelton (acting for Kauri Orewa Ltd) and it appears to largely accord with Mr Jeffrey Brown’s view of the Coastal Environment – with a strong focus on the edge of marine features, together with some cliff-lines. His boundary largely ignores the role of coastal processes in the formation of landforms that do not directly abut the CMA, even where they have clearly been shaped by coastal processes, and it affords little recognition to those headwaters and streams that feed into the Hatfields Beach estuary, even though they clearly exert a strong influence over that estuary, the beach areas across the Hibiscus Coast Highway and the open sea. In my view these ‘upper catchments’ clearly qualify as part of the Coastal Environment when factors (2) f) and h) of NZCPS Policy 1 are taken into account. Indeed, the Coastal Environment lines suggested by both Mr J Brown and Mr Skelton seems to accord more with the interpretation of that boundary under the 2004 NZCPS – not the current, 2010 version.

35. To be clear on this matter, the delineation of the Coastal Environment in 2013 was determined on the basis of Policy 1 of the NZCPS, translated into factors that are meaningful ‘on the ground’:

A. Areas Physically Linked to the CMA:

1. that are directly subject to wave action and tidal inundation / movement and which contain / define the inter-tidal margins of the CMA;
2. coastal drainage systems, including catchments and headwaters that feed directly into the CMA; and
3. landforms and vegetation cover that are directly affected / modified by exposure and proximity to the CMA – through wind action, wave action and salt exposure.

C. Areas Whose Character is Substantially Defined by their Proximity to the CMA:

4. areas within which the CMA is a dominant to significant visual entity;
5. locations whose landscape character and amenity is clearly influenced by

- proximity to, and a sense of connection with, the CMA; and
6. locations within which items of cultural and historic heritage are found that are linked to, or within the CMA.

Natural Character Values Criteria:

1. geomorphological / landform features and characteristics: headlands, peninsulas, cliffs, dunes, wetlands, reefs and ridgelines;
 2. vegetation type, cover & patterns;
 3. habitat / ecological values;
 4. water bodies and the movement of water & sediment: from the CMA to freshwater springs, tidal flows & surf breaks;
 5. experiential values: remoteness, wildness, scenic / aesthetic value, the sounds and smell of the sea;
 6. the natural darkness of the night sky; and
 7. the CMA & wider coastal 'context' or setting.
36. In my opinion, neither Mr J Brown nor Mr Skelton appropriately address the delineation of the Coastal Environment. They have misconstrued the intent and application of NZCPS Policy 1. As an aside, I also note that at paragraph 3.21 of his statement Mr J Brown has commented on the way in which current development at the southern end of Hatfields Beach has affected, presumably diminished, the existing natural character of its Coastal Environment. He appears to imply that this helps to 'set the scene' for the accommodation of further development. My own view on this is that such effects have already been taken into account in the identification of areas of High and Outstanding Natural Character around Hatfields Beach, and that the effects of new development still have to be assessed against the entirety of the current Coastal Environment. There should be no presumption that existing development at one end of Hatfields Beach helps to 'facilitate' development at the other end.
37. Turning to the implications of development for the landscape, natural character and amenity values of Hatfields Beach, Ms Woodhouse states at her paragraph 106 (Edward Henderson Family Trust) that:

"The idea of the ONL being a 'backdrop' to Hatfields Beach is incorrect. Very little of it is visible from the beach and very little is visible from HCH. The vegetation on the northern ridge, the vegetation on the western sides of the motorway (presumably this is mean to read the 'eastern' side), vegetation across the upper sections of the Otanerua Stream, vegetation along the middle and lower sections of the Otanerua Stream, vegetation up the gullies to the south of the stream and the vegetation on the ridge to the

south (presumably Alice Eaves Reserve) are all areas that are individually visible from various places in the catchment. However, the only place that they can be seen together as a contiguous area of bush is from the upper elevations of the residential area in Hatfields Beach”

38. I take issue with this assessment on two counts:
- Firstly, it is a bit like arguing that not being able to see all of Milford Sound or Mt Cook Aoraki in one go, from one vantage point, renders these iconic landscape features less than outstanding.
 - Secondly, it totally ignores **cumulative** exposure to any landscape. Such exposure can be simultaneous / concurrent – seeing two or more features from one viewpoint; but just as often it can be sequential – seeing multiple features / landscapes, or just one, from successive vantage points in the course of a journey.
39. In fact, Ms Woodhouse addresses the issue of ‘sequential exposure’ at paragraph 69 of her statement for Otanerua Property Holdings Ltd. Moreover, my photos (**Annexure 7**) demonstrate that ONL44’s combination of forest and hill country is clearly visible from the Hibiscus Coast Highway and the adjoining Hatfields Beach Reserve, and that it affords a strong backdrop / backcloth to much of the Hatfields Beach catchment – including the beach and estuary reserve areas both sides of the highway. In my assessment, the various components of ONL44 mentioned by Ms Woodhouse are exposed to four key audiences:
- Those travelling along the Hibiscus Coast Highway;
 - Those travelling along the Northern Tollroad / SH1;
 - Those using the beach, reserve and local roading network, ie. moving around, which some people are wont to do; and
 - Local residents – including those identified by Ms Woodhouse – who may well have a degree of attachment to their landscape surrounds.
40. Consequently, I cannot agree with the impression imparted by Ms Woodhouse that the pastoral areas across 51 and 57 Otanerua Rd (together with part of the Kauri Orewa Ltd landholding) are visually divorced from the native forest and hill

country at ONL44's core. In a related vein, I also disagree that some 3.0km of views across the Hatfields Beach catchment – most of them to ONL44 on and near the skyline – are “*brief and fleeting*”. Whilst acknowledging that modification of the catchment has changed the part of Hatfields Beach between the Otanerua Stream and Hillcrest Rd, it is my opinion that the same patterns and interplay of features that originally ‘drove’ the identification of ONL44 at Hatfields Beach in 2003 / 2004 are still largely evident today.

47 Otanerua Rd

41. I have reviewed Ms Woodhouse's statement in relation to 47 Otanerua Rd and disagree with her on a number of counts. The “*northern most stream in the Hatfields Beach catchment*” – as described at her paragraph 74 – is not particularly meaningful as a RUB: it bisects the Hatfields Beach catchment without providing a clear barrier to further development in the future and it would promote the subdivision of Hatfield Beach into two halves: one that is largely suburban in character and another that retains a predominantly rural character. Consequently, Ms Woodhouse's solution for a defensible RUB is no more defensible than the Otanerua Stream course and margins.
42. Ms Woodhouse confirms her views on this matter by further stating (paragraph 74) that: “*The Otanerua Stream bridge on HCH close to the beach is, in my opinion, the logical gateway to the ‘countryside’*”.
43. I do not agree with this assertion. The hill country, pasture, native forest and coastal estuary west of the highway, combined with the Hatfields beachfront, coastal cliffs, bush and open seas to the east, create a powerful impression when approaching the flats and causeway behind the beach. It imbues those using the highway with a strong feeling of leaving Auckland's metropolitan area behind and of entering northern Auckland's countryside. These feelings are amplified on nearby SH1 by the presence of the large RAP21 catchment below Halls Hill, feeding into the Otanerua Stream, while the visible patterning of pasture and bush remnants below Hillcrest Rd helps to at least support such impressions. Yet the ‘rolling back’ of this ‘gateway’ proposed by Ms Woodhouse – pushing residential development north of the Otanerua Stream – could not help but impact on impressions of Hatfields Beach from both the Hibiscus Coast Highway

and SH1. Its landscape would be bifurcated, as I have already explained and the meaningful nature of the current gateway experience would be eroded, if not substantially lost.

44. Finally, I note that at paragraph 39 Ms Woodhouse focuses on the visibility of 47 Otanerua Rd, commenting as follows:

“However, the site will not be seen from the beach and open space adjoining the beach or HCH as it will be screened by intervening landform.”

45. This statement is not strictly accurate. **Annexures 8** and **9** comprise viewshed analyses for 8m high structures within the lower half of the site and on a more elevated portion of it. These show the extent of the catchment exposed to such structures, but do not allow for the elevation – by 1.1 to 1.5m – of the average person’s eye when looking towards 47 Otanerua Rd from a car or while standing up. This would increase the extent of both viewshed catchments. Even without adjustment of the viewsheds to allow for this, they show that development on different parts of 47 Otanerua Rd would be exposed to a wide range of vantage points. These include much of the existing suburban area in the vicinity of Otanerua Rd, Hammond Ave and Sun Valley, but also a sizeable stretch of the Hibiscus Coast Highway and small segments of both SH1 and Hillcrest Rd. Even though development on the subject site would not be visible from the actual beachfront – screened by the elevated highway on its causeway – it would still be exposed to the sand / mud flats at the northern end of the beach during low tide, and it would be visible from both the Hibiscus Coast Highway and the western margins of the beach reserve (**Annexure 10**). I suspect that Ms Woodhouse’s impressions of the site’s visibility have been coloured by the vegetation across much of it, even though development of the site would inevitably strip most of that cover away.

46. Having said this, I agree with Ms Woodhouse that new development near the toe of No.47 would merge, relatively seamlessly, with the housing presently lining Otanerua Rd, Beachwood Drive and Seaview Crescent, and would be viewed in the context of that existing residential development: the extent and shape of the housing area would change slightly, but this would not greatly alter the overall composition and qualities of the wider landscape. In addition, vegetation flanking

the Otanerua Stream would continue to screen lower lying housing and their curtelage.

47. On the other hand, I am less comfortable with development on more elevated portions of the site. This is more likely to intrude into sequence of pasture and bush remnants draped over the Hillcrest Rd ridge and running down towards the Otanerua Stream. Instead of ‘reading’ as a logical extension to the existing Otanerua Rd development, it is therefore more likely to start projecting development westwards, up the Otanerua Stream valley in the direction of SH1, ONL44 and RAP21. Strategically, any such movement also raises the prospect of conflict with proposed RPS provisions which address ONLs:

	Identification and Protection of Outstanding Natural Landscapes
Policy 5	<p><i>Protect the physical and visual integrity of ONLs by:</i></p> <ol style="list-style-type: none"> <i>a. avoiding the adverse effects of subdivision, use and development within the ONL on the natural characteristics and qualities that contribute to the values of the ONL.</i> <i>b. making built elements subservient to the dominance of the features, patterns, processes and qualities that make the landscape an ONL</i> <i>c. avoiding activities that individually or cumulatively detract physically or visually from the values of the landscape</i> <i>d. maintaining the visual coherence and integrity of the landscape ONL</i> <i>e. maintaining natural landforms, natural processes and vegetation areas and patterns</i> <i>f. maintaining the visual or physical qualities that make the landscape iconic or rare</i> <i>g. maintaining high levels of naturalness in ONLs that are also identified as ONC or HNC areas.</i> <p><i>In implementing this policy the following matters should be taken into account:</i></p> <ul style="list-style-type: none"> <i>▪ the extent of man-made changes to the natural characteristics and qualities</i> <i>▪ the presence or absence of structures, and buildings or infrastructure</i> <i>▪ the temporary or permanent nature of adverse effects</i> <i>▪ the physical and visual integrity, and natural processes of the location</i> <i>▪ the physical, visual, and experiential values that contribute significantly to the natural feature’s values</i> <i>▪ the functional need for any proposed infrastructure to be located in the area.</i> <i>▪ the location, scale and design of any proposed development</i>
	Management of Natural Landscapes and Natural Features
Policy 7	<p><i>Manage subdivision, use and development on areas adjacent to an ONL or ONF by</i></p> <ol style="list-style-type: none"> <i>a. protecting visual and biophysical linkages between the site and the ONL or ONF</i> <i>b. avoiding adverse cumulative effects on the values of an ONL or ONF</i> <i>c. avoid adverse effects on Mana Whenua values</i> <p><i>In implementing this policy the following matters should be taken into account:</i></p> <ul style="list-style-type: none"> <i>▪ the extent of man-made changes to the natural elements, patterns, processes or qualities</i> <i>▪ the presence or absence of structures, and buildings or infrastructure</i>

	<ul style="list-style-type: none"> ▪ <i>the temporary or permanent nature of adverse effects</i> ▪ <i>the physical and visual integrity, and natural processes of the location</i> ▪ <i>the physical, visual, and experiential values that contribute significantly to the natural feature's values</i> ▪ <i>the functional need for any proposed infrastructure to be located in the area</i> ▪ <i>the location, scale and design of any proposed development</i>
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48. These provisions are aligned with the *King Salmon* decision and, as stated in my statement on Topic 019 and related RPS provisions (dated October 2014), focus on the **avoidance** of adverse effects on ONLs. In my opinion, it would be impossible to maintain the integrity of ONL44 (Policy 5e, especially) or the buffering effect of the pastoral open space near that ONL (Policy 7) if residential development were to start to encroach too close to its margins.

49. In my assessment, more intensive residential subdivision across the more elevated parts of 47 Otanerua Rd would lay the foundation for such encroachment. In particular, such development would be more continuously exposed to the Hibiscus Coast Highway and the duration of exposure to SH1 would also increase. Perhaps of most concern, however, it would signal a new direction for future residential development at Hatfields Beach, as I have already implied.

50. On the basis of these findings, I have reviewed the current proposals for 47 Otanerua Rd and agree with Mr Nathan Te Pairi that there is some room for realignment of the RUB to accommodate development on the lower sections of that property. However, it remains my view that such development should be limited to the 'bottom' of Otanerua Rd, so that it clearly registers as an extension of the current residential area. I do not support the relocation of the RUB to encompass all of the land owned by Otanerua Property Holdings Ltd and consider that boundary relocation should restrict development on higher parts of the site, as well as within the margins of the Otanerua Stream.

51 & 57 Otanerua Rd; 203 Weranui Rd

51. Many of the issues that I have just set out are also applicable to other properties subject to RUB submissions at Hatfields Beach. In particular, residential development on 51 Otanerua Rd – as depicted in Mr Hartley's Figure 3 – would bisect ONL44 north of Hillcrest Rd and the Otanerua Stream, close to SH1.

Although Ms Woodhouse supports this incursion into the ONL and has heartily criticised it, she has not suggested a new boundary for ONL44. Nor has she addressed exactly how residential development within the ONL might comply with the proposed RPS provisions.

52. In a similar vein, Ms Woodhouse has indicated that she has few problems with residential development spreading across the apron of open space between the Hatfields Beach estuary and the bushline of ONL44 (parts of 51 Otanerua Rd and 203 Weranui Rd, and all of 57 Otanerua Rd). In reply to my EIC on this matter, Ms Woodhouse responds with her reference to “*brief and fleeting views*” (paragraph 109 of her Edward Henderson Family Trust statement), which I have already discussed, and at paragraph 110 she commences by quoting from paragraph 36 of my EIC: “*If development were to be located between the estuary area and elevated forest above Otanerua Stream, or in the vicinity of the Hibiscus Coast Highway – either abutting the coastal escarpment (submission 4826; **Annexure 13**) or climbing towards the ridge crest that marks the edge of the Waiwera catchment (Submission 6623) – then it would have a very significant impact on the perceived values of ONL44, especially when viewed from the Hibiscus Coast Highway*”. Yet this is followed by inferred criticism of the inclusion of Alice Eaves Scenic Reserve in ONL44 and the statement that:

“None the less. Development adjacent to the estuary would be addressed by rules addressing land prone to inundation and development controls on the zone for this area.”

53. Ms Woodhouse then goes on to state that “*development across the rest of the Hatfields Beach catchment is entirely feasible from a physical perspective*”, and at paragraph 113 she asserts that “*... the ‘gateway’ can effectively be moved north without any loss of value to the ONL.*”

54. I’m really not sure what to make of this series of statements. There is no assessment of views from around the Hibiscus Coast Highway to ONL44’s forest areas on the western skyline, no reference to the importance of the foreground estuary / lagoon, and no discussion of the way in which the pastoral areas interposed between these features help to connect them to form a unified whole. Nor is there any real analysis of the way in which the highway, the reserve next to the estuary or pohutukawa-lined margins of Hatfields Beach provide a platform

for interaction and engagement with this landscape. The issue of Alice Eaves Scenic Reserve is simply not relevant to this discussion, while the issue of physical development feasibility has no bearing on the landscape effects of potential development directly ‘in front of an ONL’.

55. Indeed, apart from suggesting that views from the Hibiscus Coast Highway to ONL44 are of little importance and that it does not form the backdrop to Hatfields Beach, I can find nothing in Ms Woodhouse’s statement that directly addresses or refutes my concerns about the effects of development above the estuary on ONL44. Instead, at paragraph 108 Ms Woodhouse comes close to agreeing with the concerns that I have expressed. Quoting from paragraph 34 of my EIC as follows – *“the open pasture above Hatfields Beach’s estuary acts as the frontispiece and contextual frame for the forest closer to the skyline. This is reflected in the way that part of ONL44 actually extends beyond the confines of forest near Otanerua Stream to embrace some of the pastoral slopes that are visually linked to the main body of forest / bush”*. She then suggests that *“... this hypothesis may be partly correct*” before deviating off into a discussion about the slopes south of the Otanerua Stream.
56. From my standpoint, this implies that Ms Woodhouse can see the issue I have raised, but can’t confront it directly. The situation might be different if she and her clients had seriously challenged ONL44 as part of Topic 019, but, as I have already explained, this did not happen. In my opinion, the effects of residential development across the swathe of slopes between the Hatfields Beach estuary and native forest would be dramatic; it would sever these features from one another and isolate most of the ONL44 bush behind a dense layer of housing, roading and infrastructure clamouring for sea views. This would result in a fundamental change to the landscape character and values of Hatfields Beach.
57. Moreover, the resulting predominance of residential skyline on the slopes directly above the Hatfields Beach estuary must inevitably have an impact on the residual natural character values of that estuarine system. The estuary is already degraded by the presence of the motorway, nearby housing to the south and – to a degree – even the pastoral slopes that enclose it. Yet, the emergence of a broad swathe of residential development across its immediate backdrop represents and even more fundamental change to the estuary’s physical and

visual 'context'. The effects generated by such a change would almost certainly be significant to highly significant, with reference to NZCPS Policy 13 (1) (b):

“avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment.”

58. In addition, the encroachment of development on 51 Otanerua Rd westwards, might well maintain a shallow veneer of vegetation and revegetation down the eastern side of SH1. But, the massing of houses across slopes both sides of the Otanerua Stream would be hard to ignore for passing motorists. The current predominance of bush and pasture – together with some rural-residential development – would lose much of its cohesion and continuity, with housing sitting in the foreground of views towards the Hatfields Beach coastline and more distant, Hauraki Gulf. As a result, the unity and integrity of the current landscape leading towards both Halls Hill and the Waiwera Estuary would be appreciably eroded, and the intrinsic values of ONL44 and RAP21 – as a whole – would be appreciably compromised.
59. It is therefore my view that the RUB should not be relocated to accommodate more intensive residential development on the subject properties.

WARKWORTH

Evidence Of Karen Pegrume – Sandspit Rd FUZ

60. Ms Pegrume concentrates on two aspects of my EIC:
- The upper Mahurangi River near the Hill Rd Intersection; and
 - The potential crossing of the Mahurangi River to link in with the central Warkworth road network and provide access for residential living in the vicinity of Sandspit Rd.
61. Ms Pegrume also addresses the issue of broader development directions for Warkworth as a whole, although I have not been asked to specifically address this strategic issue. Turning firstly to the matter of the Hill Rd intersection, I agree

that the proposed intersection changes made public in August 2015, and comprising the following changes, could have a number of effects:

- Widening the southbound approach on SH1 and increasing the capacity of the left turn into Matakana Road by separating the left turn lane.
- Widening the northbound approach on SH1 and increasing the capacity of the right turn into Matakana Road by extending it back to the Shoemith Street intersection.
- Removing the southbound right turn from SH1 into Hill Street.
- Constructing a 3-metre wide shared pedestrian and cycle path between Hudson Road and Hill Street.
- Improving the connection between Sandspit Road and Elizabeth Street.

62. Yet, these changes do not necessarily require the removal of the totara and rimu trees near the intersection or complete removal of the Totara Reserve. In fact, that would be a truly severe outcome of the proposed changes.

63. Turning to the more important matter of a bridge crossing the Mahurangi River, Ms Pegrume states at paragraph 5.24 that both Shona Myers and I “*have taken the liberty of imagining an environmentally destructive and poorly located bridge as the inevitable outcome*” of a river crossing “*and assessed (the inevitably adverse) effects of that imagining.*” In reply to this comment, it is important to note that all resource management decision-making, planning, landscape architecture and indeed design, requires the use of experience, imagination and creativity to align images of what might be or should be with the mechanisms design to produce such outcomes. There is nothing preordained at all about a bridge design for the Mahurangi River, nor was a predetermined bridge location or design the foundation for my assessment of a river crossing over the Mahurangi River. On the other hand, I was fully cognisant of the likely range of locations for a future bridge over the river – given the preferred connection with the road network between Kapanui and Percy Streets, what the related topography of the mid-upper river channel is like, and the nature of the vegetation cover and activities that currently occupy both sides of the river corridor. These matters provided a sound, if less than absolutely complete, ‘picture’ of any such

proposal's effects. Moreover, I am also well aware of the statutory context for any such development, which is scarcely addressed at all by Ms Pegrume.

64. The important points to emerge from my EIC, regardless of any bridge's final design and location, are these:

- A bridge over the Mahurangi River is likely to be a substantial structure due to the scale of the river crossing and the various communities – from Warkworth and Snells Beach to Matakana and Omaha – that it would ultimately have to serve;
- The river fairway and northern channel margins are highly cohesive and attractive (**Annexure 12** and my EIC Annexures 21-23);
- This is reinforced by the mass of totara, then mixed broadleaf, forest that solidly covers most of the River's northern embankments;
- The southern river margins are covered in public reserve, a boardwalk cum promenade, a jetty lined with historic vessels, a children's play area, grassed banks that are used for picnicking and a mixture of car parks and lanes that act as conduits between the river bank and Warkworth's town centre;
- The river corridor is identified as part of ONL43, subject to the proposed policies already outlined; and
- The river corridor sits within the Coastal Environment, and its fairway and northern embankment are identified as being an Area of High Natural Character (No.58).

65. These matters are addressed in more depth at paragraphs 58-62 of my EIC, and her evidence has not changed my views on the likely implications of a bridge crossing over the Mahurangi River. At the very least, Policies 5 and 7 of the proposed RPS, Policies 13(1)(b) and 15(a) of the NZCPS pose a rigorous 'test' for any such proposal. However, I also remain of the view that any such crossing would have a divisive effect on the river corridor, splitting it in two, with a corresponding impact on key qualities, including its passive, aesthetic values; its naturalness – both physical and perceived; its recreational values; and its historic heritage values – both in terms of natural heritage and as a repository for cultural artefacts / vessels that remind the community of Warkworth's historic associations.

66. Consequently, much as Ms Pegrume evokes images of the bridge linked to the falls and walkway next to the river in the middle of the town centre, a structure over the main body of the Mahurangi River would inevitably have a quite different type and order of effects. In my opinion, the overall integrity of the river corridor would be substantially diminished by such a development.
67. In my assessment, this matter still has a significant bearing on the appropriateness of urban expansion and location of the RUB northeast of Warkworth's current town centre. I agree with Ms Pegrume that the terrain and landscape features north and east of the settlement limit expansion in both of those directions. However, I am less convinced that, in the long term, development across the Mahurangi River is a more efficient and less environmentally challenging prospect than further growth to the west – towards the Mahurangi Flats. Furthermore, the current location of the Ara Tuhono / Puhoi to Wellsford by-pass, well west of the current SH1 alignment, appears designed to accommodate precisely such expansion in the future.

SNELLS BEACH

Evidence Of Karen Bartlett

68. Karen Bartlett states at paragraph 7 of her EIC that she would like the zoning of her property at 124 Mahurangi East Rd changed from Countyside Living to Large Lot Residential or Single House Zone. She states at her paragraph 3 that this is largely because the amenity of Snells Beach has already been eroded by population increases, "large shopping complexes", The Warehouse and a number of large subdivisions – though these are unspecified.
69. I have visited the surrounds to the subject site and it is clear that it lies at a point of significant landscape transition – between the existing Snells Beach settlement and the hills and bush that traverse the peninsula landform to frame both the Mahurangi Harbour / River and Kawau Bay (**Annexures 13 - 15**). As motorists enter Snells Beach and descend down a quite steep slope south of the entry to Arabella Lane, Ms Bartlett's property becomes visible to the right of the road

corridor – for the most part, below it. As a result, the property’s patchwork of paddocks, shelterbelts, fencing, barns and housing – together with that of neighbouring properties – comes into view. It traverses a small scale, central ridge that is flanked by two shallow gullies and a slightly flatter area of land closer to the intersection of Lett and Muncaster Roads with Mahurangi East Rd.

70. Immediately north of the subject site, the terrain rears steeply up towards a well-defined ridgeline on which a solitary white house is located. This sequence of rising terrain, overlaid by pasture, shelterbelts, amenity planting, bush pockets and a rather subdued scattering of houses, acts as the ‘entry point’ to the hill country that frames and encloses Snells Beach – as a whole – to the north. Consequently, even though the subject site lies just outside this ‘bookend’ of coastal ridges, headlands and bush that clearly defines the end of the Snells Beach coastal terraces and settlement area, it still sits on the physical cusp of that hill country and contributes to the definition of the current ‘village’. Although a sequence of historic ‘single house’ type properties tracks down the eastern side of Mahurangi East Rd – clamouring for views to Kawau Bay – that development is quite historic and does not, in my opinion, set the scene for similar changes west of the road corridor.
71. The subject property and neighbouring rural-residential properties also contribute to the rural amenity of northern Snells Beach. In this context, it is notable that the site is exposed to other parts of Mahurangi East Rd – closer to the commercial centre – and a broad swathe of residential properties nearby, in the vicinity of Riverleigh Drive, Clifton Lane and Hewson Drive. Together with adjoining, and nearby, Rural Coastal properties that stretch from the Mahurangi River to Kawau Bay, it helps to clearly define the rural edge of Snells Beach.
72. In my assessment, some form of Countryside Living Zone is appropriate at this interface – to consolidate the village area, and to prevent vegetation clearance, earthworks and residential development from eroding its rural and natural qualities. Again, the issue of maintaining a ‘gateway’ – in this case to and from Snells Beach and Algies Bay – is also a consideration in relation to protection of this edge.
73. Taking these factors into account, it is my view that Countryside Living and Rural

Coastal zoning remains generally appropriate across, and on the margins of, the hill country that I have just described. At the same time, I consider that Single House residential zoning across the subject property would be a step too far. It would roll back the 'countryside' that currently provides an attractive and important frame for Snells Beach to an extent that I regard as being inappropriate.

Evidence Of Lance Hessell

74. Lance Hessell's statement on behalf of Brick Bay Trustees requests the rezoning of part of its property at 55 Arabella Lane from Rural Coast Zone to a Single House Zone, together with a smaller Public Open Space (Informal Recreation) Zone. The Brick Bay Trustees' property sits immediately adjacent to a site – at 57 Arabella Lane – that had previously been consented for residential development. That 18-lot subdivision would directly abut Arabella Lane and overlook it from the 'front' of a small ridge next to the road. The site at No.55 sits on that same ridge, but 'behind' most of No.57 when viewed from the direction of the existing Snells Beach settlement. Mr Hessell comments that, in looking at any extensions to the RUB, adverse landscape effects comprise one of the five key criteria assessed by Auckland Council.
75. I have now visited the subject site and viewed it from a number of locations, including the existing network of streets within the existing settlement, from the nearby beach and reserve, and from the full length of Arabella Drive (**Annexures 16 & 17**). In relation to views from most of these directions, it appears that the 18 lots of housing already consented on No.57 (to the immediate south) would obscure and visually absorb much of the development on subject property: indeed that consented development would be exposed to a number of residential areas west, south and east of Arabella Lane, and would dominate much of the small ridge at the edge of Snells Beach. In my opinion, additional development on the Brick Bay site would appear to be directly linked to that 18-lot site, and would roll over the ridge behind its consented housing.
76. As a result, development at 55 Arabella Lane would, by and large, be more visually recessive than the consented development and would have a largely incremental effect. It would not impact appreciably on the character and values of

the nearby beach and coastal reserve, nor would it be particularly, or excessively, prominent when approached from neighbouring residential areas and other parts of Arabella Lane. It would not alter the perceived extent of the existing settlement, nor would it impact on the primacy of the hills, ridges and headlands of ONL38.

77. Overall, it is my opinion that Single House residential development on 55 Arabella Lane, as proposed by Mr Hessel, is therefore acceptable from a landscape standpoint.

Stephen Brown

17 December 2015



annexure 1.

Overview of Crater Hill (foreground) and other still legible local volcanic features: Pukaki Crater / Lagoon, Mangere Lagoon, Mangere Mountain & Puketutu Island (from near to far)



annexure 2.

Approaching Crater Hill down Tidal Rd from the north (above) & entering the crater on the old quarry access road (below)



annexure 3.

Looking across Pukaki Crater & Lagoon from the margins of Pukaki Rd (above & below)



annexure 4.

Looking down Tidal Rd past the existing state housing and willows marking the near margins of Waokauri Creek to Crater Hill



annexure 5.

Looking towards the forest margins and hill country of ONL44 from near the intersection of the Hibiscus Coast Highway with Otanerua Rd (above) & from Hillcrest Rd (below)



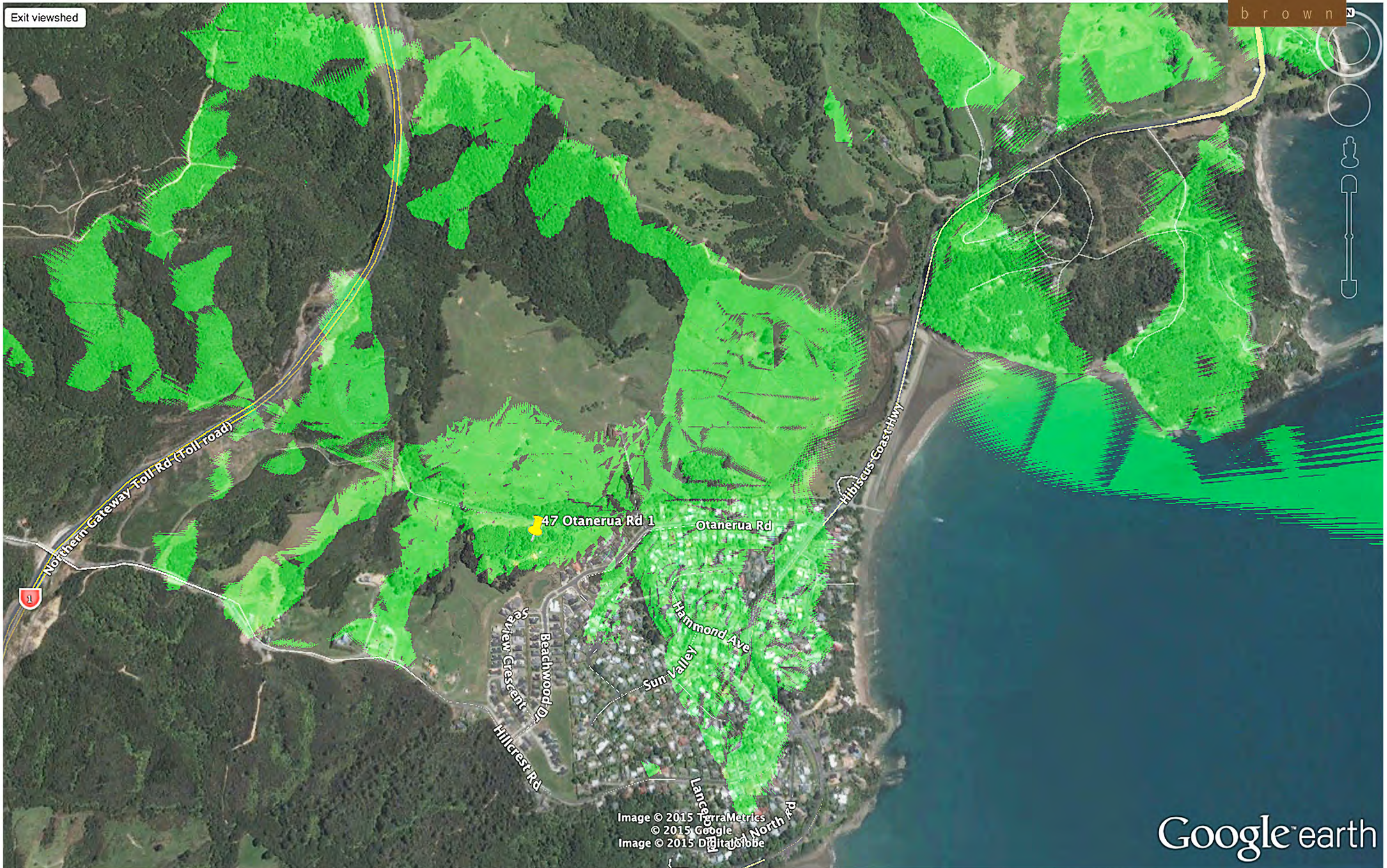
annexure 6.

The Hatfields Beach estuary / lagoon and some of the pockets of bush & pasture that frame it



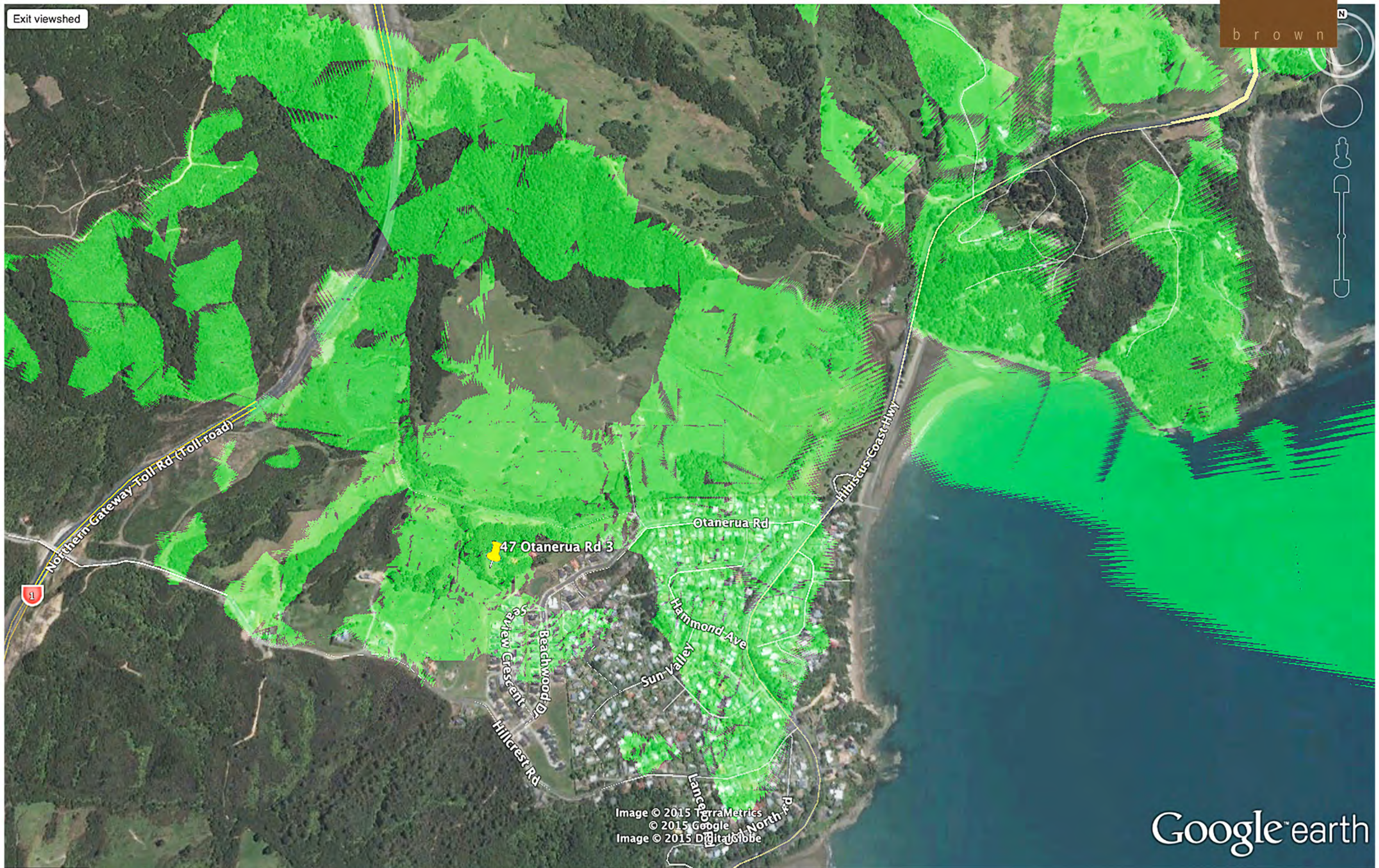
annexure 7

Looking from the Hibiscus Coast Highway (above left) & from the Hibiscus Beach Reserve (centre & below) towards the hills & native forest of ONL44



annexure 8

Viewshed analysis of an 8m high structure on the lower part of 47 Otanerua Rd - with the green overlay showing those areas that would be exposed to that structure at ground level



annexure 9

Viewshed analysis of an 8m high structure on the upper part of 47 Otanerua Rd - with the green overlay showing those areas that would be exposed to that structure at ground level



annexure 10

Looking from the Hibiscus Coast Highway next to the bridge over the estuary mouth and over the beach reserve to 47 Otanerua Rd - with the red roof of the current house in the centre of that site visible. Future development (including vegetation clearance & earthworks) on the site below that house would be much less visible than development higher up the property



annexure 11

Looking from the gravel car park next to the Hibiscus Coast Highway bridge towards 47 Otanerua Rd - with the red roof of the current house in the centre of that site visible



annexure 12

Looking up and down the Mahurangi River from the river reserve next to Warkworth's town centre



annexure 13.

Looking towards 124 Mahurangi East Rd & neighbouring rural-residential properties from Mahurangi East Rd as it descends towards Snells Beach (above) & looking towards the subject site from the intersection with Muncaster Rd & Lett Rd (below)



annexure 14.

Looking down Lett Rd and into 124 Mahurangi East Rd (above) & looking down Muncaster Rd - the dividing line between 'town & country' at present (below)



annexure 15.

Looking from Mahurangi East Rd within the Snells Beach settlement towards the line of rural-residential properties and hill country north of it



annexure 16.

Looking down Arabella Lane towards No.55 Arabella Lane (above) & from Schooner Avenue on the edge of Snells Beach (below)



annexure 17.

Looking down Arabella Lane from Hampton Mews - behind the Snells Beach beachfront (above) & from the beachfront reserve (below)