

**BEFORE THE KĀPITI COAST DISTRICT COUNCIL
TE URUHI TO KĀPITI ISLAND GATEWAY PROJECT**

Under the Resource Management Act 1991

In the matter of a resource consent application by Kāpiti Coast District Council under section 88 of the Act, to carry out the Te Uruhi to Kāpiti Island Gateway Project

**STATEMENT OF EVIDENCE OF REBECCA CRAY (LANDSCAPE, VISUAL,
AND NATURAL CHARACTER EFFECTS) ON BEHALF OF THE APPLICANT**

Dated: 19 September 2022

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TABLE OF CONTENTS

INTRODUCTION	1
EXECUTIVE SUMMARY	4
RESPONSE TO SUBMISSIONS	8
RESPONSE TO COUNCIL OFFICER'S SECTION 42A REPORT	19
CONCLUSION.....	20

INTRODUCTION

1. My name is **Rebecca Cray**.
2. I am a Senior Landscape Architect at Beca Limited and Registered Landscape Architect with the New Zealand Institute of Landscape Architects (**NZILA**). I have practised landscape architecture for 10 years, based in Rotorua, Wellington, Vancouver and now Auckland.
3. My experience primarily consists of parks and subdivision development projects, and over the last four years I have focused on preparing landscape and visual assessments for a wide range of development projects located across the North Island.
4. The following project experience is particularly relevant to my evidence as it includes the assessment of landscape and visual effects within in the coastal environment:
 - (a) **Kopu Marine Precinct, Thames Coromandel District Council, 2020 – 2021:** I prepared a landscape and visual assessment that accompanied the fast-track application for a new commercial wharf, haul-out facility, and carpark on the edge of the Waihou River, Thames. The assessment included the preparation of visual simulations, a Zone of Theoretical Visibility and full consideration of landscape, natural character, and visual effects.
 - (b) **Gisborne Port, Eastland Port, 2020 – 2021:** I undertook a landscape analysis and prepared preliminary landscape advice for the proposed twin berth extension of Eastland Port. The project included reclamation, a new seawall and breakwater on the edge of Poverty Bay and the Turanganui River, Gisborne. The preparation of the preliminary study included a Zone of Theoretical Visibility and included impacts on the historical Cooks Landing Site, which doubled as a site of cultural significance for mana whenua.
 - (c) **East Cape Road, Stage 2 Security Project, Gisborne District Council, 2020 – 2021:** I prepared a landscape and visual assessment for road stabilisation and widening works, including new sea wall rock revetments and coastal planting to secure the existing East Cape Road. The assessment included the preparation of visual simulations and a full consideration of landscape, natural character, and visual

effects on a wide range of key landscape features (including the coastal environment) and viewing audiences. It included impacts on regionally significant coastal rock formations and the wider Outstanding Natural Landscape.

Project involvement

5. My involvement in the Te Uruhi – Kāpiti Gateway Project (the **Project**) began in March 2020 when, following an initial site visit; I began preparing the landscape and visual effects assessment (**LVA**) that eventually accompanied the resource consent applications to Kāpiti Coast District Council (**Council**) and Greater Wellington Regional Council (**GWRC**) in July 2021.¹
6. Since the initial LVA there have been several changes and iterations to the Project. Most significantly, in November 2021 the 'Southern Carpark' (as I refer to it in my evidence – this is 'Area 2' referred to in **Megan Taylor's** evidence) was added, which required rework of and additions to the initial LVA. The updated version of the LVA, dated 11 April 2022, is Appendix 8 to the Assessment of Effects on the Environment (**AEE**) of the Project.
7. I have undertaken a number of visits to the site and surrounding local landscape since my involvement in the Project began, including:
 - (a) On 25 March 2020, I carried out an initial site visit to Te Uruhi visitor centre site, which included visiting the adjacent Paraparaumu Beach and dune lands, residences opposite and north of the site, and the area further south along Maclean Park. Private property was not entered into, and where relevant, residential views were assessed from the nearest publicly accessible point, such as the footpath. This proposal included the (then) additional carparking area proposed for Golf Road (not triggering a landscape assessment) and identification of the Project's visual catchment, potentially affected properties, and photography from key representative viewpoints.
 - (b) Later in 2020, due to concerns around level of effect, a second site visit was undertaken to the property at 5 Marine Parade, where I captured 50mm photography from Ms Knight's living room and front lawn, for the purposes of forming a visual simulation for Te Uruhi.

¹ The resource consent application was originally lodged on 20 May 2020. However, it was withdrawn on 1 July 2021 and a new application lodged. The date of the resource consent application and AEE to which my technical assessment was appended is 29 June 2021.

- (c) On 16 March 2022 I made a third site visit when the Southern Carpark was added as an alternative to the Golf Road carparking proposal. I visited the immediately adjoining the beach public reserve, and publicly accessible footpaths outside opposite residents. I undertook a visual assessment and captured 50mm photography.
 - (d) On 16 August 2022 I carried out a fourth site visit following receipt of submissions and in preparation of my evidence. I re-walked the visual assessment areas indicated for Te Uruhi and the Southern Carpark, and specifically analysed the relationship of the site to 54, 55, 56, and 58 Marine Parade.
8. My evidence is the culmination of this combined Project involvement and considers the NZILA's recently released *Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines*.
9. In preparing my evidence I have also reviewed various materials, including:
- (a) the section 92 request for further information, and the applicant's response to that request;
 - (b) the submissions on the application;
 - (c) the section 42A report, prepared by Mr Anderson (Council's processing planner) including memoranda prepared by Ms Julia Williams (Council's consultant landscape architect) dated 17 February and 13 April 2022; and
 - (d) in draft, the evidence of **Alison Law** (representing the applicant), **Ms Taylor** (on traffic-related matters), and **Emma McLean** (on planning and conditions).

Code of Conduct

10. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2014. This evidence has been prepared in compliance with that Code, as if it were evidence being given in Environment Court proceedings. Unless I state otherwise, this 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 I express.

Purpose and scope of evidence

11. The LVA sets out my methodology, records the relevant statutory context, and contains an assessment of the landscape, visual and natural character effects of the proposed Te Uruhi building and Southern Carpark. It considers the potential for effects on the physical environment, local residents, and the users of Marine Parade, Maclean Park, and Paraparaumu Beach.
12. I do not repeat the content of the LVA in my evidence, other than where I reaffirm key findings and/or highlight where my initial findings have changed.
13. Rather, the primary focus of my evidence is to provide comments on issues raised in submissions and respond to relevant commentary and recommendations provided in the section 42A report.

EXECUTIVE SUMMARY

Context

14. The Council is seeking consent for Te Uruhi – a new visitor centre and biosecurity facility building, including extensive decking and planting, a carpark, pedestrian bridge over Tikotu Stream, walkways, pou, ihuwaka, signage and lighting – and the Southern Carpark, 500 metres to the south, which will include new native coastal planting within and adjacent to the carpark area. These proposed developments sit within and adjacent to Maclean Park, in Paraparaumu Beach, on the Kāpiti Coast.
15. Under the Kāpiti Coast Operative District Plan 2021 the two sites are zoned Natural Open Space and are subject to Special Amenity Landscape and Coastal Environment overlays.
16. Divided lengthways, the seaward slither of dune land adjoining Maclean Park is recognised as an Area of High Natural Character (Area 4a) and corresponds with a coastal 'no build' line which is not exceeded by Te Uruhi or the Southern Carpark. In combination with the Coastal Environment Overlay these two overlays seek to identify, protect and restore areas of high natural character and avoid, remedy or mitigate the effects of inappropriate subdivision, use and development. It concludes: "*Inappropriate development does not result in further loss of coastal dunes in the area mapped as the coastal environment.*"²

² Kāpiti Coast Operative District Plan 2021, Natural Open Space Zone chapter, DO-O4, 5.

17. The Natural Open Space Zone seeks to manage landscape and conservation values, whilst providing active and passive recreation. Key characteristics are a low proportion of building coverage relative to land area, and typically being located on the coastal margin.
18. I understand that the Natural Open Space Zone plan change is at an early stage of the Resource Management Act 1991 (**RMA**) process and is unlikely to have a bearing on this application for consent.
19. For Special Amenity Landscapes; *Subdivision, use and development in special amenity landscapes will be located, designed and of scale and character that maintains or enhances the values of the landscape areas.*³

Effects

20. The Te Uruhi building will replace a modified area currently used as a carpark. The Southern Carpark will be established within what is currently a mown and organically revegetating back dune environment. Landscape and visual effects for each component have been assessed separately; being 500m apart, their respective physical receiving environments are different, and they will be experienced separately.
21. In terms of the existing environment, the Te Uruhi site is primarily an existing flat asphalt carpark, with mature pohutukawa specimens encasing its northern, western, and southern sides. It is connected to Maclean Park to the south through gently rolling lawns, developed play and skate features and pockets of vegetation connected by a central shared path.
22. Tikotu Stream abuts the site to the north, the immediate channel of which has been highly modified for flood control purposes. Coastal foredunes are to the south west and run contiguously along Paraparaumu Beach.
23. While both the Te Uruhi and the Southern Carpark areas have a mix of coastal attributes and park-like amenity, the degree of natural character associated with the Southern Carpark site is higher than that of the more modified Te Uruhi site. This is because it is relatively undeveloped in nature, has informal low vegetation, a rolling back dune formation and legible connection with the Paraparaumu Beach foredune and beach.

³ Kāpiti Coast Operative District Plan 2021, Natural Features and Landscape chapter, NFL-P2.

24. The Project's adverse visual, landscape, and natural character effects are summarised in table form in section 5.4 on page 21 of the LVA.
25. The adverse effects of the Te Uruhi building on natural and landscape character are **low**. The resulting visual effects range from **very low** (from the residence at 3 Golf Road) to **moderate** (from 3 Marine Parade). I have since reconsidered my assessment of the degree of visual effect on 5 Marine Parade, in light of comments made by Ms Williams, and in my view the Project will have **moderate – high** visual effects from this property, as explained in more detail below.
26. The adverse effects of the Southern Carpark on the landscape and natural character values of the wider receiving environment are **low - moderate**, with localised effects being slightly higher. Visual effects on the identified residents resulting from that aspect of the Project are **low - moderate**. I have included an assessment of transient visual effects for these residents and conclude that there will be **low - moderate** visual effects overall, as I explain in more detail below.
27. The effects rankings given for Te Uruhi and the Southern Carpark have been assessed with mitigation, restoration, and amenity planting (as detailed in the Wraight and Associate Landscape Plans) being implemented in the planting season immediately following completion of construction.

Response to submissions

28. In respect of Te Uruhi, three submissions were received that raised issues with the LVA's findings, relating to increased traffic movements and a perceived lack of detail regarding lighting and signage. In summary, my response is as follows:
 - (a) The evidence of **Ms Taylor** is that the Project will not bring about a material difference in terms of traffic volumes or movements, or a loss of carparks, in the area. As such, in my view no adverse effects on residential amenity will arise in that respect.
 - (b) Conditions establishing limits and controls on the nature and extent of lighting have been proffered by the Council and I am comfortable that they will appropriately mitigate potential adverse effects on natural character and residential amenity, which range from **low-moderate to moderate-high** on the submitters in question.

29. In respect of the Southern Carpark, two submissions were received that raised issues around the visual and amenity impact of vehicles using the carpark, including campervans. Taken together, the **very low transient** visual effects and **low – moderate permanent** visual effects will result in an **overall low - moderate visual effect** on the identified residences.
30. Three submissions raised issues with the carpark's 'appropriateness' and the degree of effect on the natural character values resulting from the dune modification and carpark establishment. These concerns have not materially changed my assessment of natural character effects, summarised above, or my view that they are properly considered **low – moderate**.

Response to the section 42A report

31. I agree with Ms Williams' assessment and have reached the same effects conclusions, including a **moderate – high** visual effects rating for 5 Marine Parade, as described below in my evidence.
32. In response to Mr Anderson's determination of natural character effects⁴ I have provided clarifications around my assessment of this below in my evidence.
33. Conditions have been proffered by **Ms McLean** to address concerns around lack of detail relative to residential amenity effects of lighting and signage at Te Uruhi.
34. In summary, my assessment of the overall degree of landscape, visual and natural character effects of the **Te Uruhi buildings** site is:
- (a) **Low** landscape effects;
 - (b) **Low – moderate** visual effects for Manly Street, Kāpiti Road, and Golf Road residences;
 - (c) **Moderate** visual effects for 3 Marine Parade;
 - (d) **Moderate – high** visual effects for 5 Marine Parade; and
 - (e) **Low** natural character effects.
35. For the **Southern Carpark** site, my assessment is:

⁴ Paragraph 95 of the section 42A report.

- (a) **Low – moderate** landscape effects;
 - (b) **Low – moderate** visual effects on 55, 56, 57 and 58 Marine Parade;
and
 - (c) **Low – moderate** effects on the natural character of the wider coastal environment.
36. These effects are subject to the implementation of the proposed landscape plans prepared by Wraight and Associates, and adherence to the lighting and signage conditions (for Te Uruhi).

RESPONSE TO SUBMISSIONS

Introduction

37. Seven submissions were received on the application; six of them raise various concerns regarding the Project's visual and natural character effects, which I address in turn below (grouped by topic).⁵
38. Five submissions specifically commented on lack of detail around the lighting and signage proposed for the Te Uruhi. I acknowledge that this detail was not provided as part of the initial application (although there are various District Plan controls that apply, as discussed in **Ms McLean's** evidence). I have since provided further design parameters for the lighting and signage relative to landscape, visual and natural character matters, and coordinated across the relevant Project team disciplines with a view to developing appropriate conditions, which are discussed further below and in the evidence of **Ms McLean**.
39. Two submissions raised concerns regarding campervans potentially parking in the Southern Carpark. This issue was not specifically assessed within the LVA and has subsequently been addressed in my response below.

Assessment methodology

40. Dr Davey questioned the quantitative criteria used in the landscape assessment methodology on which the LVA was based. Quantitative conditions are used in the assessment process such as 'the degree of

⁵ Frederick Davey, Murray Guy, Clare Holden and Michael Wilson, Andrew and Leeana Burgess, Zena Knight, and Bruce Barnett.

modification of an area' and pertains to changes such as volume of earthworks (m³) or extent (m²) of vegetation removal.

41. The landscape and visual assessment process is not, however, reliant on quantitative criteria. Rather the methodology focuses on the complex associations between attributes and values of a landscape. Landscape assessment is fundamentally a qualitative exercise, and an element of subjectivity is inherent in the process.
42. This approach is in line with the NZILA's *Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines, 2021*. Page 52 of the Guidelines, Item 5.31 further explains:

*It is more credible to treat landscape criteria as **pointers** than part of a mathematical formula. Ultimately, reasons and explanation in support of professional judgement are more important than prescribed criteria.*

Effects of the Te Uruhi building and operations

Visual effects

43. Submissions from Ms Holden and Mr Wilson,⁶ Mr Barnett, Ms Knight, Mr Guy, and Dr Davey identify matters relating to visual effects and amenity impacts of Te Uruhi. The key issues raised were the visual impact of the building, loss of coastal views, additional traffic movements and lack of detail surrounding proposed lighting and signage.
44. The LVA considered the landscape, visual, amenity and natural character effects stemming from the massing, bulk, and location of the proposed building. It also specifically discussed the degree of change and resulting effects on visual amenity for the identified properties.
45. The visual effects for the identified submitters and the location of their residences are assessed as follows:

<i>Localised private residences</i>	Visual Effects	Submitter/ Property Owner
Manly Street, Kāpiti Road, and Golf Road	Low - moderate	Dr Davey (of 3 Golf Road)
1 Marine Parade	Very low	(none received)
3 Marine Parade	Moderate	Mr Barnett
5 Marine Parade	Moderate - high	Ms Knight

⁶ And Miklare Investments Limited.

46. Adverse effects on landscape character are assessed as **low**.
47. The submissions received from Ms Knight and Mr Barnett have both indicated that "*The size and location of the proposed Gateway will greatly and negatively impact on the natural environment and quality of life.*"
48. It is generally accepted that residential viewing audiences are more sensitive to changes in their receiving environment. This is because the changes are permanent and experienced every day.
49. The proposed building will be directly opposite Mr Barnett's property at 3 Marine Parade. The LVA assessed the likely impact on views from his property as "*Full, ground level and second storey views of and over the top of Te Uruhi. Some screening/softening by existing and proposed vegetation. For second storey users their direct lines of sight to Kāpiti Island and Tikotu Stream will likely be partially interrupted by the proposed building.*"
50. In my view these adverse visual effects are at a **moderate** level.
51. The location of Te Uruhi relative to Ms Knight's property at 5 Marine Parade will interrupt the visual connection to the coastal environment (wind, waves, skyline, and views of Kāpiti Island). The LVA identified **moderate** visual effects for this residence.
52. On reflection, in preparing this evidence I have concluded that a **moderate – high** degree of visual effect will be experienced from this property due to the interruption of views to Kāpiti Island and the coastal environment by the Te Uruhi building, additional consideration of amenity impacts and the inability to mitigate these.
53. In response to Mr Barnett's and Ms Knight's comment, "*The size and location of the proposed gateway will greatly and negatively impact on the natural environment and quality of life*", I acknowledge that the development will negatively impact Ms Knight's and Mr Barnett's enjoyment of the natural environment (Kāpiti Island, Paraparaumu Beach) however I do not agree that the building will have a significant adverse effect on the environment because the site is currently a sealed carpark. I agree that the Te Uruhi development will have an impact on the amenity these residents currently enjoy from their properties, with respect to their dominant west-facing coastal

aspect and current lower levels of development within the existing receiving environment at Maclean Park.

54. In the context of the broader setting (14 residential properties notified), seven submissions were received on the application and of those, two (3 and 5 Marine Parade) properties will have **moderate** and **moderate – high** visual effects respectively.
55. Dr Davey also raised concerns regarding visual impact on his property at 3 Golf Road, which will have partial visibility of Te Uruhi at a distance of approximately 120 metres: *"The Gateway would lie in the middle of our view, were it not partially concealed behind the trunks of phoenix palms."*
56. I acknowledge that Dr Davey's views of the site rely partially on offsite screening, and that the screening in question is offsite, owned and managed by the Council. The Council has not signalled any intent to remove this screening vegetation either as part of this application or any separate concurrent projects. Given the distance from the site and foreground existing roading environment I do not think removal of the palms will result in material changes to the identified **low - moderate** visual effects for this property.
57. Mr Barnett and Ms Knight also asked *"how [can] the building be tucked into a dune when it's raised about the ground?"* This statement within the LVA is not applicable to views from their properties; it was referring to the building's appearance from the identified view points on Paraparaumu Beach, and further demonstrated by the visual simulation (of viewpoint 13) prepared by U6 Photomontages.

Increased traffic movements (Ms Knight, Mr Barnett, Dr Davey)

58. Three of the submissions identify concerns with *"increased traffic congestion and greater vehicle movements"* and *"traffic movements and parking in the area associated with an increase in visitors."* I am able to comment on these submissions in terms of effects on visual amenity.
59. I refer to **Ms Taylor's** evidence which concludes no anticipated material increase in the volume and frequency of vehicles passing and no material effect on parking near their properties.
60. Dr Davey also comments on increased traffic and vehicle movements in his submission. Dr Davey's property is at 3 Golf Road, approximately 120 metres from the site, adjacent to the Kāpiti Road/Manly Street/Marine Parade

roundabout. **Ms Taylor's** evidence is that surrounding vehicle movements can be readily accommodated and that the roundabout does not need upgrading.

61. In terms of potential transient effects for these submitters, taken together, the reduction in carparks, relative relocation of entry/exit points and comparable or potentially reduced vehicle movements and volumes overall is, at worst, neutral in terms of degree of change from the existing activity and use. The resulting adverse transient effects on the identified properties, if any, are therefore negligible.

Lighting (Mr Barnett, Ms Knight, Dr Davey)

62. Three submissions raised issues regarding lighting and signage, focusing on a lack of detail in the application, which limited their ability to provide any relevant comment.
63. Standard district plan controls apply to signage and lighting, but in order to address these submission points I have considered the existing lighting within the vicinity of these properties and met with the applicant, lighting designer, and **Ms McLean** to discuss the proposed parameters for lighting.
64. Through desktop assessment and a subsequent daytime site visit, the baseline environment includes street lighting along Marine Parade. Heading 50m further south, it is likely to include the skate park lighting within Maclean Park which is on until 10pm each night (summer) and 9pm during winter. From 150 metres further south it is also likely to include business and private property lighting and light spill, associated with the town centre. The baseline lighting environment therefore reflects the urban nature of the Paraparaumu Beach township.
65. I have not undertaken a night-time assessment of the current lighting relative to the identified residents, beach, and site.
66. The outcomes sought to manage visual, amenity and natural character effects are:
 - (a) contained light spill within all site boundaries;
 - (b) avoidance of glare effects on neighbouring properties; and

- (c) restriction of lighting to the hours necessary to operate and manage the building and associated carpark safely, after which 'minimal' default lighting for safety should be used.
67. I have since worked with the applicant and **Ms McLean** regarding the intent of lighting, context of the site and potential ways in which to manage, reduce or avoid lighting effects on residents along Marine Parade, the intent being lighting that is fit for purpose, will deliver on the various constraints, and be practically achievable.
68. The resulting condition within **Ms McLean's** evidence has been formed on input from specialist lighting designers and is, in my view, appropriate for mitigating the potential adverse visual and natural character effects associated with lighting at Te Uruhi.

Signage (Mr Barnett, Ms Knight, Dr Davey)

69. Three submissions commented on the lack of detail regarding signage.
70. The District Plan permits signs in the Natural Open Space Zone through Rule SIGN-R1. This rule covers sign measurement criteria, setbacks, signage for onsite activities and the use of electronic or digital signs.
71. I consider that the nature, intent, size, and number of signs, if unregulated, might have the potential for further cumulative visual effects on the residences at 3 and 5 Marine Parade. This is primarily due to signage orientating towards the Marine Parade road interface, and therefore the residents at 3 and 5 Marine Parade.
72. In saying this, based on my observations of signage that is present in and around the Te Uruhi site, Maclean Park (with the exception of the Boat Club) and the wider coastal landscape and the proposed condition pertaining to lighting, it seems unlikely that significant additional signage will occur.
73. I have worked with the applicant to understand the intent and nature of the signage proposed, in the absence of a signage location plan or signage concept designs.
74. Based on the applicant's intent to meet rule SIGN – R1, and my observations of the signage present in the surrounding area, the additional outcome sought to manage potential effects on residents is that the location, size, and

orientation of signage consider the potential for cumulative visual effects on the residences at 3 and 5 Marine Parade.

75. I refer to the proffered condition within **Ms McLean's** evidence which in my opinion suitably addresses the above sought outcomes.

Inaccurate representation of trees and associated adverse effects (Mr Barnett, Ms Knight, Dr Davey)

76. Architectural renders have not been relied on to assess landscape, visual and natural character effects within my assessment, and I am comfortable with the degree of consideration of proposed trees and retention of existing trees relative to the effects conclusions reached within the LVA.
77. Earlier within the LVA process, I had investigated the use of additional trees and higher vegetation to further screen and soften the views relative to 3 and 5 Marine Parade, however sight lines, traffic requirements and carriageway clearances relative to the garden configurations resulted in only one additional tree being reasonably accommodated relative to these residences.
78. I recognise that the trees will provide some height, amenity, softening and scale relative to integrating the building within the landscape and residents' views. However, the resulting tree locations and staggering are such that extensive screening and softening of the building relative to these residents is not achievable.
79. Their sporadic locations along the eastern boundary, in addition to the realistically achievable growth (height and span) within this timeframe are not sufficient to mitigate the visual effects generated by the building within the medium term (3 – 8 years).
80. The tree planting, retention and associated architectural representations have therefore not correlated to a reduction in effects ranking within the LVA for the identified residents.

Natural character effects (Ms Holden / Mr Wilson and Dr Davey)

81. Ms Holden, Mr Wilson, and Dr Davey have identified concerns around the building's appropriateness within the coastal environment, and its ability to preserve natural character.
82. To reiterate, I assess the adverse effects of the Te Uruhi building and surrounding activities on natural character to be **low**.

83. In my view the building is an appropriate use and development in natural character terms because it utilises an already developed site (existing carpark) and does not generate significant effects on the natural character values of the adjoining coastal environment, associated area of Area of High Natural Character or Tikotu Stream.
84. The Te Uruhi building also meets the relevant criteria for building height and coverage within the Natural Open Space Zone.
85. I also acknowledge that the building is being designed as a relocatable building for the purposes of being able to respond to future coastal and climate changes. However, my assessment of natural character effects does not materially rely on the ability of the building to be relocated.

Effects of the Southern Carpark

Landscape values, visual impact of carpark (Mr and Mrs Burgess, Ms Holden / Mr Wilson, Mr Guy)

86. Ms Holden and Mr Wilson have a property located at 55 Marine Parade and submitted that: *"the proposal will detract from the current high landscape values of the fore dune."* They consider themselves to be *"directly impacted by the proposed work because our outlook over the beach and sea will no longer be over a grassed dune but will instead be over a car park and rock wall. This is a significant reduction to the natural character of the coastal environment which we currently enjoy."*
87. The visual effects for the identified submitters and the location of their residences were identified within my assessment as follows:

<i>Localised private residences</i>	Visual Effects	Submitter/ Property Owner
55 Marine Parade	Low - moderate	Ms Holden, Mr Wilson
56 Marine Parade	Low - moderate	Mr Guy
58 Marine Parade	Low - moderate	Mr and Mrs Burgess

88. My assessment identified **moderate** visual effects for the residents at 55, 56, 57 and 58 Marine Parade, reducing to **low - moderate** visual effects on the basis that *"additional planting will provide height undulation and further screen and soften the straight edges of the carpark."* Taking into

consideration the coastal mitigation planting, landscape effects were also identified as **low - moderate**.

89. I refer to page 20 of the LVA where it says:

The carpark and landform changes to the dune form represent a partial loss or modification to the pre – development visual amenity. While carparking is not uncharacteristic within the view, it is uncharacteristic in the open space within the foreground of these residents' views. The native restoration planting is extensive and will enhance the integration of the carpark into Maclean Park, however it is not able to fully screen parked vehicles and the associated landform changes due to sightline, overhanging, safety, and maintenance reasons.

90. Taking into consideration the submitters' issues and relevant sections of the LVA, I do not believe that there is cause for reconsideration of the assessment of permanent visual effects for the identified residences.

Vehicles and use by campervans (Ms Holden / Mr Wilson, Mr and Mrs Burgess, Ms Knight, and Mr Barnett)

91. Mr and Ms Burgess of 58 Marine Parade, and Mr Guy of 56 Marine Parade submitted on the "*adverse visual effects from vehicles of all sizes and associated noise,*" and the "*use of the carpark for campervans,*" as did Ms Holden and Mr Wilson.

92. The LVA did not assess the transient effects associated with the introduction of carparking; vehicle movements, campervan use, the associated noise, lights, and potential impacts on residential amenity. I turn to these matters now.

93. In terms of transient visual effects generated by vehicles, it is relevant to note that the existing environment is characterised by Marine Parade, existing vehicle movements and current provision for public shoulder parking along both sides. Additionally Mr and Mrs Burgess' property also adjoins public shoulder parking and the roading environment of Ocean Road.

94. The design of the Southern Carpark does not cater for campervans, for example, there are no allocated Freedom Camping spaces or turning radius and lane width design specifically catering for them.

95. Further, concerns regarding potential overnight stays should be considered in the context of other carparks along Marine Parade, which do provide

designated Freedom Camping spaces (six spaces), more space for manoeuvring, and better amenity through direct views of the coastal environment. They are also set back further from the busy Marine Parade and specifically the Ocean Road/Marine Parade intersection.

96. In their evidence **Ms Taylor** and **Ms Law** address campervan parking as an operational issue. I defer to their evidence regarding these matters.
97. In summary, the Southern Carpark will generate additional vehicle movements (including campervans) and associated transient changes; parking, decelerating, accelerating, manoeuvring, however in the context of the receiving environment, residual transient effects are considered to be **very low**.
98. Taken together, the **very low transient** visual effects and **low – moderate permanent** visual effects will result in an **overall low - moderate visual effect** on the identified residences.

Preserving natural character of coastal environment

99. Ms Holden and Mr Wilson, Mr Guy, and Mr and Mrs Burgess noted a concern in their submissions about the potential adverse effects on the coastal environment and natural character values resulting from the dune modification and carpark establishment.
100. Ms Holden and Mr Wilson specifically included; "*We are directly impacted by the proposed work because our outlook over the beach and sea will no longer be over a grassed dune but will instead be over a car park and rock wall. This is a significant reduction to the natural character of the coastal environment which we currently enjoy.*"
101. In responding to these submissions, it is important to note that there are both *physical* and *perceptual* effects for natural character.
102. The **physical** extent of the coastal environment is the entire dune system (up to the Marine Parade road edge) and the foredune extending along Paraparaumu Beach.
103. The natural physical attributes of this coastal environment are:⁷

Types of dune vegetation – low scraggly, mixed variety of exotic and native species are characteristic. Low-lying mixed vegetation are characteristic of

⁷ LVA, p 7.

less disturbed dune environments. The adjoining duneland (foredune) is recognised as important habitat and an area of conservation administered by the Department of Conservation.

104. The LVA assessed that the Southern Carpark will generate "very localised"⁸ **moderate** effects on natural character. This is due to the removal of vegetation and back dune landform modification. These are *physical* effects on the identified natural character values.
105. As I have mentioned above, the **physical** extent of the coastal environment and the attributes described above include the entire dune system (up to the Marine Parade road edge) and the foredune extending along Paraparaumu Beach.
106. In the context of this wider receiving coastal environment, the degree of effect on natural character is **low-moderate**.
107. In discussing perceptual natural character values, the LVA identified the residents' existing view as:⁹

Foreground road view and associated intermittent road edge carparking, with open space of Maclean Park primarily identifiable as a thin mown parallel grass strip, the ridge of which is peppered with coastal dune vegetation and rank grasses. To the rear of view Kāpiti Island can be seen silhouetted against the skyline. Modified urban character in foreground transitioning to more natural coastal character.

108. The degree of visual effect on these residents was identified as **low – moderate**, subject to the proposed coastal mitigation planting being implemented.
109. The Southern Carpark will impact the perceived natural characteristics experienced by these residents resulting from the introduction of hardstand and parked vehicles to their middle-ground views. Vehicle movements to and from the carpark will also impact these views (visual simulation VP13) and the existing degree of naturalness.
110. As acknowledged within the LVA, these perceptual effects are mitigated by the introduction of new native coastal planting. In addition, the planting further to the south enhances the natural character in this location. Localised

⁸ LVA, p 15. "Very localised" in this context means within 100 metres.

⁹ LVA, p 12.

perceptual natural character effects relative to the identified residents are **low - moderate**.

111. Perceptual natural character effects relative to the defined wider coastal environment are **very low**.
112. Taking the physical and perceptual effects on the natural character of the (local) and wider coastal environment together, in my assessment overall effects on natural character are **low - moderate**.

Inappropriate use and development of the coastal environment

113. The modification of the dune was also specifically raised by Ms Holden and Mr Wilson as an "*inappropriate (and unnecessary) use and development of the coastal environment and fails to preserve the natural character of the coastal environment.*"
114. As I mentioned previously, the entire dune system provides the context in which the appropriateness of the proposed carpark should be considered, because it is within this context that the carpark site derives its value regarding natural character.
115. The carpark is considered appropriate because the natural character is not of a sufficient quality (such as to merit an 'outstanding' or 'high' classification) that it requires full protection from any development, and what is proposed is a minor modification that avoids any specific or significant impacts on the defined wider coastal environment being considered.
116. The Project also provides for substantial additional coastal dune planting in excess of vegetation quantities being removed which will positively connect and support the adjacent significant foredune habitat identified by DOC, providing a positive contribution to the natural characteristics of the reserve.
117. **Ms McLean's** evidence provides further comment on this submission point, from a policy and planning perspective.

RESPONSE TO COUNCIL OFFICER'S SECTION 42A REPORT

118. I agree with Ms Williams' assessment and have reached the same effects conclusions, including a **moderate – high** visual effects rating for 5 Marine Parade, as described above.

119. I also agree with Ms Williams' note in paragraph 93 "*the proposal will have minimal effects on what they consider to be an area of High Natural Character to the west, and the effects from the proposal are localised.*"
120. With regard to Ms Williams' advice notes dated 17 February 2022 and 13 April 2022¹⁰ and to clarify signage matters, I understand the three fixed advertising banners outside Te Uruhi are no longer being sought for consent.
121. Ms Williams recognised the absence of a landscape lighting and signage plan as likely controversial for residents. I believe the applicant's signage and lighting conditions proffered in **Ms McLean's** evidence suitably address any residual concerns regarding these matters.
122. Mr Anderson's natural character effects conclusion in paragraph 95 of the section 42A report states:
- Based on this advice, there is at least a minor adverse natural character effect on 55, 56, 57 and 58 Marine Parade, as well as a minor natural character effect on the wider environment.*
123. I have addressed natural character effects previously in my evidence (paragraphs 109,110), concluding that perceptual effects on properties adjacent to the proposed carpark will be **low**.
124. Natural character effects will be **low** in relation to the Te Uruhi building site and **low-moderate** in relation to the Southern Carpark site and in the context of the wider coastal environment. **Ms McLean's** evidence deals with these effects from a policy / planning perspective.

CONCLUSION

125. In my assessment the overall degree of landscape, visual and natural character effects of the **Te Uruhi** site will be:
- (a) **Low** landscape effects;
 - (b) **Low - moderate** visual effects for Manly Street, Kāpiti Road, and Golf Road residences;
 - (c) **Moderate** visual effects for 3 Marine Parade;

¹⁰ Memoranda from Ms Williams (Drakeford Williams) to Tom Anderson dated 17 February 2022 and 13 April 2022, item 2, appended to section 42A report as Appendix D.

- (d) **Moderate – high** visual effects for 5 Marine Parade; and
- (e) **Low** natural character effects.

126. These effects are subject to the implementation of the proposed landscape plan prepared by Wraight and Associates, retention of remaining pohutukawa trees identified within their plan, and the signage and lighting design meeting the detailed criteria suggested in the draft conditions.

127. In my assessment the overall degree of landscape, visual and natural character effects on the **Southern Carpark** site will be:

- (a) **Low – moderate** landscape effects;
- (b) **Low - moderate** visual effects on 55, 56, 57 and 58 Marine Parade; and
- (c) **Low – moderate** effects on the natural character of the wider coastal environment.

128. These effects are also subject to the implementation of the proposed coastal peripheral carpark planting and extensive additional coastal enhancement planting being undertaken, as per the landscape plan prepared by Wraight and Associates.

Rebecca Cray

19 September 2022