

BEFORE THE ŌPŌTIKI DISTRICT COUNCIL

UNDER the Resource Management Act 1991

AND

IN THE MATTER OF a resource consent application by G & S Stilwell for subdivision consent, and land use consent under the National Environmental Standard for Assessing and Managing Contaminants in Soil (NESCS), at 98C Ōhiwa Harbour Road (Onekawa Road), Ōhiwa

**STATEMENT OF EVIDENCE OF CHRISTOPHER PHILIP CAMPBELL
ON BEHALF OF G & S STILWELL**

LANDSCAPE ARCHITECTURE

10 AUGUST 2022

Introduction

1. My full name is Christopher Philip Campbell, I hold a Bachelors of Landscape Architecture from Lincoln University and currently hold the position of Senior Associate - Landscape Architect at Greenwood Associates. I have been practicing landscape architecture for seventeen (17) years and for the previous thirty-four (34) months I have been practicing in New Zealand. Prior to this I was practicing in the middle east. I am a member of the New Zealand Institute of Landscape Architects (NZILA). I am preparing to commence the process of registration in the NZILA within the next cycle. I have been preparing landscape and visual assessment reports since February 2020, during this time I have prepared approximately 15 landscape and visual assessment reports across both urban and rural environments.

Code of Conduct for Expert Witnesses

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

Scope of evidence

3. My evidence will cover:
 - (a) A summary of the existing environment.
 - (b) A summary of the landscape proposal across the nine proposed lots.

- (c) The potential impacts as a result of the physical changes to the contemporary landscape environment arising from the proposal.
 - (d) A summary of the applicant's proposed alternative layout with the overall number of proposed residential lots reduced from 9 to 7.
 - (e) Response to the officer's report.
 - (f) Response to officer's proposed conditions.
4. I can confirm that I have read and are familiar with the submissions, officer's report and proposed consent conditions.
5. I visited the site on 17th February 2022 in order to prepare the Landscape and Visual assessment report (subsequently dated 22 April 2022 - revision 2). During this site visit I visited both the site itself and the surrounding areas to determine the visibility of the site from within the wider environment. During this visit I obtained 21 photographs, 9 of which were utilised in the subsequent Landscape and Visual Assessment report. This site visit was also utilised to form the basis of the landscape plan, with particular attention to a proposed plant palette / strategy.

Executive summary

6. The change from a working orchard to a rural residential development can often be considered to be significant in terms of landscape character and visual effects. However, when considering the proposal within the context of the wider landscape, in my opinion there are notable positive changes in terms of landscape character values arising from the proposal. The most notable positive change is the removal of mass bodies of exotic planting and their replacement with native vegetation. In my opinion this will increase the

'naturalness' of the site and will be particularly evident when viewed from within the Ōhiwa Harbour and Ōhope.

7. The proposed native planting has been arranged so that when combined with the retained avocado trees and retained shelter belts, any future built form placed upon the proposed lots will not be viewed in its entirety, whilst still allowing future occupants of the site to enjoy views out to the wider landscape.

Existing environment

8. At a broader context the site sits upon a ridgeline that forms part of a wider network of hill and rolling pastoral landscape. The immediate land coverage (across the areas adjacent to the site) varies from pastoral grass, native forest remnants, and shelter belts and to blocks of horticultural planting with associated artificial canopy and wind protection. Clusters of residential built form can be observed at the lower reaches of the hill side upon which the site is located. Standalone dwellings are also visible throughout the landscape, with some situated at elevations upon or close to the ridgeline. Whilst the overarching character of the surrounding landscape can be considered to be semi-rural, the elements of built form within the landscape cannot be ignored as landscape elements and therefore I consider the characterisation of rural-residential as identified in the Greenwood Associates landscape and visual assessment remains correct.
9. The site sits atop a ridgeline that forms part of the eastern boundaries of the Ōhiwa Harbour. The areas immediately surrounding the site feature the land coverage patterns just described. An exception to this prevailing land coverage pattern is the Ōhiwa Cove subdivision, a residential subdivision which sits adjacent to the southern and western boundaries of the site and contains provisions for 5 rural residential lots. These 5 rural residential lots all currently contain dwellings under various stages of construction/development. The external finishes, bulk and form of these dwellings varies.

10. The site sits within the 'coastal zone' of the Ōpōtiki District Plan.
11. The ridgeline upon which the site sits also represents the eastern extent of the 'coastal environment' as defined in the Bay of Plenty Regional Policy Statement.
12. The ridgeline, which forms the western portion of the site represents the apex of a hillside that borders the Ōhiwa Harbour. The Ōhiwa Harbour is considered to be an area of 'Outstanding Natural Character' and is identified within the Bay of Plenty Regional Policy Statement.
13. To the west of the site, two (2) 'outstanding natural features and landscapes' as identified in the Regional Coastal Environment Plan (hereinafter referred to as ONFL) are present, specifically ONFL 4 and 5. Whilst the site itself does not share any physical boundary with either of these two features, it is contained within the same overall visual catchment when viewed from Ōhope and the Ōhiwa Harbour.
14. Whilst the site itself does not sit within either ONFL described above. I acknowledge that the site's presence in occupying a highly visible ridgeline means that any modification to the landscape has the potential to affect the scheduled landscape / character values of the ONFL , and the 'Outstanding Natural Character Area' being the Ōhiwa Harbour.
15. The site contains an operating avocado orchard, an existing single level dwelling and open paddocks containing livestock. The avocado orchard sits across two levels, with a larger portion sitting at the lower part of the site and a smaller portion sitting atop the ridgeline. These two areas of avocado orchard are separated by a paddock which houses a batter slope to manage the level change between the two orchard areas.

16. The avocado orchard is currently encased in a series of cryptomeria shelter belts at its southern, western and eastern boundaries, with internal shelter belts present at the vehicular access to the existing dwelling, at the western edge (i.e. the high point) of the paddock that separates the two areas of avocado orchard and at the northern boundary of the existing shelter belt that separates the upper portion of the avocado orchard from the existing dwelling and its associated outdoor living space. A portion of the shelter belt that is located across the southern boundary sits outside the boundary of the site and is contained within the paper road that runs parallel to the southern and western boundaries of the site.

17. Within the Greenwood Associates landscape and visual assessment, the level of sensitivity of the site to absorb change was considered to be very low-moderate. As per the seven-point rating scale of the NZILA guidelines this rating is to be revised to low-moderate. This rating was ascribed by not only assessing what impact a change would have on the landscape, but also takes into account what positive changes can be implemented. I consider that a rating of moderate-high as noted by Mr Goodfellow in his peer review assessment assumes that any added proposal will not be able to adequately compensate for a perceived loss of character. I do not consider this to be the case for the proposed subdivision as there is opportunity to incorporate positive landscape outcomes through planting and allow for the retention of existing rural-residential character elements.

Landscape Proposal

18. The site is proposed to be subdivided into 14 lots. Of these 14 lots, 9 are proposed to be developed with the future erection of residential dwellings. These lots are identified as lots 1, 2, 3, 4, 6, 7, 10, 11 and 12. Of the remaining 4 lots, 2 are to be transferred to a neighbouring property, 1 will contain the existing dwelling upon site, 1 is to be a road to be vested and 1 will be planted entirely in native vegetation.

19. Of the proposed 9 residential lots, 8 (lots 1, 2, 3, 4, 6, 7, 10, 11, 12) will be located within the portion of the site that currently operates as an avocado orchard. The remaining proposed residential lot (lot 7) is to be situated within an existing livestock paddock.
20. Of the proposed 8 residential lots within the existing avocado orchard, 3 will sit adjacent to the ridgeline at the western portion of the site. The remaining 5 will sit across the lower portion of the site, with the existing paddock that separates the 2 areas of avocado orchard incorporated into proposed lot 6.
21. The majority of existing avocado trees within the existing orchard are to be removed to accommodate building platforms with 34 trees across the 8 proposed lots within the orchard proposed to remain.
22. Of the existing shelter belts present at the site, the existing belt at the western edge of the site (currently adjacent to the upper reaches of the orchard), the shelter belt at the high point of the paddock separating the two areas of orchard and the existing shelter belt at the eastern boundary of the site will be removed. The internal shelter belts at the northern edge of the driveway to the existing dwelling (i.e.: the southern boundary of lot 7) and the shelter belt that separates the existing dwelling from the upper portions of the avocado orchard will be retained. The cryptomeria shelter belt located within the site at the southern boundary will be retained. The existing native shrub shelter belt at the western boundary of the existing paddock separating the orchard will be retained. It is proposed to maintain these retained shelter belts at 4-6m height.
23. The removal of these shelter belts will open views to the existing avocado orchard, which will in turn open views to any future built form within these areas. This will have some impact upon the ridgeline. As illustrated in the scheduled viewpoints of the LVA, elements of built form will be visible from

distances exceeding 1km from the east and will likely be visible from within the large parts of Ōhiwa Harbour. The level of visibility is represented in the landscape simulation package (VP6).

24. Those dwellings sited at a lower elevation at the eastern boundary of the site will not have the same level of visibility within the landscape although elements of built form will still be perceptible when viewed from the east on approach to the site. The level of visibility is represented in the landscape simulation package (VP6).
25. The presence of dwellings in relatively close proximity to one another could be perceived as detracting from a sense of 'ruralness' (that contributes to the prevailing landscape character) within the landscape, however as identified within the Greenwood Associates landscape and visual assessment and discussed earlier, clusters of built form are present throughout the surrounding landscape, particularly on portions that front Ōhiwa Harbour. Therefore the presence of built form in relative close proximity (in comparison to a traditional rural environment dominated by larger farms) cannot be considered a fully unexpected visual outcome within the local landscape. To reduce this potential perception of a loss of the prevailing character, the integration of future anticipated built form through on-site planting and controls over the external appearance of any future built form is required.
26. As this proposal relates to sub-division, no specific architectural designs have been put forward as a part of this proposal. Therefore I have recommended the following controls on built form to the applicant:
 - Colours of external finishes restricted to recessive colours which have reflective values below 20 percent as defined within the BS5252 colour palette. Figure 1 on page 20 of the earlier prepared landscape and visual assessment report indicates the colours that proposed dwellings would be restricted to.

- Height restriction of 7m. to highest point of roof profile (from proposed future ground level) within all residential lots at the eastern boundary of the site. (Proposed lots 1, 2, 3, 4, 6, 7).
 - Height restriction of 5m. to highest point of roof profile (from proposed future ground level) within all residential lots at the western boundary (i.e.: upon the ridgeline) of the site. (Proposed lots 10, 11 and 12).
27. These controls on future dwellings will restrict built form within the landscape to a smaller height than would currently be permitted (up to 9m). The reduces the height of buildings, and also allows for on-site planting to have a greater mitigating effect on built form through providing an element of screening. The proposed darker external finish colour palette ensures that any proposed built form will have a lower level of visibility when sited against both proposed and retained vegetation.
28. To absorb future anticipated built form, fragmented native planting (a combination of trees and shrubs) is proposed at both the external and internal boundaries of the proposed 9 residential lots and across lot 14. The arrangement of this planting is intended to appear naturalistic and provide a sense of contrast to the surrounding pastoral landscape as can be appreciated when viewing the surrounding landscape from afar from both the western and eastern sides of the site. A native plant palette has been proposed to reflect those native plant species currently present within the adjoining property to the east (Lot 2 DP555172). In total over 10,261 native trees and shrubs are proposed for the site.
29. A benefit of this proposed planting treatment is the introduction of a more naturalistic landscape approach to the eastern and western boundaries of the site. This will be particularly apparent at the western edge of the site wherein the existing shelter belt sits in contrast to the greater natural vegetation

coverage at ridgelines to the north and south of the site (a contrast can be best appreciated when viewed from afar) (refer viewpoints 6-9 of the landscape and visual assessment report). The planting of lot 14 also provides a naturalistic element to the eastern edge of site.

30. Elements of the existing character are maintained through the site with the retention of avocado trees within the proposed rural-residential lots and the retention of the existing paddock that separates the two parts of the orchard and plateaus of the site. The retention of this paddock as a part of lot 6 will allow for the retention of livestock within the site.
31. The applicant has advised that retained avocado trees will require a basic light prune once a year or a heavier prune every 2-3 years. The applicant further advises that avocado trees are self-managing and that if unpruned they will grow up to 20 metres in height. The applicant has restricted the number of retained avocado trees on each site to ensure that the maintenance required of future lot owners is not overly onerous. At present 34 avocado trees are proposed to be retained across the site.
32. A landscape plan has been provided in Appendix 1 that outlines the above proposal. In response to the S42a report, the proposed heights of the shelter belts have been indicated on the supplied landscape plans.
33. The applicant has been actively engaged in the plant procurement process since the inception of this project. Initially the applicant advises that they approached 5 large commercial nurseries within the Auckland and BOP regions to provide trees for the site. The applicant subsequently approached Naturally Native nursery in Rotorua who agreed to supply native trees to this project. At present the applicant has 655 native trees available to install across the site in a single operation, which exceeds the number of trees currently indicated on the proposed landscape plans.

34. In response to the assertion in the S42a report that the proposed planting is more of a residential style of planting, I consider that the proposed planting is sufficient to provide naturalistic long-term mitigation and that due to the proactive plant procurement strategy of the applicant, the potential exists to install a greater density of trees at the critical boundaries of the site where on-site observations dictate that this would provide a greater level of absorption to future built form.

Assessment of effects

35. I have assessed the landscape effects of the proposal with regards to visual amenity which are assessed against the proposed landscape response. Whilst the application is for the sub-division of the site and not for individual dwellings, an assessment has been undertaken utilising anticipated built form as per the design controls discussed earlier.
36. Three landscape visual simulations have been prepared to demonstrate the effects of the implementation of built form within the site and any mitigating effect that the proposed planting will have both at installation and 5 years after installation.
37. Having reviewed the comments in the S42a report, I have remodelled the buildings with a 200m² footprint. In response, the following adjustments have been made to the simulations.
- Lines indicating positions of obscured dwellings have been removed.
 - The simulation entitled 'Viewpoint 10' has been remodelled using a 55mm photograph to be consistent with the other supplied simulations.

- Transparent blocks representing possible built form at the adjoining Ōhiwa Cove subdivision have been added. Whilst specific building plans are not known, these blocks are modelled at 5m height. These blocks have been added to provide a more accurate overview of the current receiving environment.
38. The visual simulations have been prepared on the basis that all future residential built form is installed at the same time, however as the lots will be individually developed such a scenario is not anticipated to occur in reality as it can be reasonably expected that dwellings would be constructed at varying times within the next 1 – 5 years. Therefore, the size of installed trees may be larger than demonstrated in the supplied simulations.
39. As identified through both the Greenwood Associates Landscape and Visual Assessment report and within the Officers S42a report, there will be an effect upon the character values of the Ōhiwa Harbour by introducing elements of built form (where limited built form currently exists) which will sit in contrast to the contemporary landscape elements (pastoral rolling landscape and fragmented native vegetation). At present the existing shelter belt sits in contrast to more 'natural' elements of the ridgeline. I acknowledge that the level of contrast to the existing landscape of the surrounding ridgeline will be greater from three elements of built form (being the future dwellings on proposed lots 10, 11 and 12) as opposed to a vegetative shelter belt.
40. I consider that as the landscape growth matures, the proposed planting will progressively integrate any future built form located upon the ridgeline by obscuring portions of the built form and providing a greater degree of 'naturalness' than what is currently afforded by the existing shelter belt. I acknowledge that during the interim period between plant installation (which the applicant confirms would be approximately 1-1.5m in height at the time of install) and maturity that the effects of built form upon the ridgeline of three elements of built form when viewed beside established and anticipated built

form (it is noted that as per the prepared visual simulations that three elements of built form are unlikely to be viewed in their entirety from a single publicly accessible location), will have a temporary visual impact on the ridgeline that could detract from the prevailing landscape character. However, due to the proposed design controls including the proposed colour and height of the buildings, I do not consider this temporary impact to be to the extent that an adverse effect is created.

41. The potential for adverse effects upon the contemporary landscape character generated by anticipated built form at the eastern boundary of the site is less than the potential for adverse effects generated by future anticipated built form at the western boundary of the site. This is based upon the lower elevation of these lots within the wider landscape in comparison to those at the western boundary of the site that sit upon a ridgeline. Future anticipated built form at the eastern boundary will not be viewed in conjunction with existing built form to the same degree. The prevailing topography and alignment of publicly accessible accessways limit views to the eastern edge of the site. The removal of the existing on site shelter belt allows for the installation of native planting that will provide a visual continuation of the existing native planting located outside of the site and provide a degree of obscuration to any anticipated future built form.
42. Whilst the proposal sees the conversion of the site from an orchard to a rural-residential development, elements of existing character elements are retained throughout the site.
43. I have considered the effects of the proposal upon the scheduled ONFL 20 in the RCEP and have concluded that the proposal does not have any effect upon the scheduled values.
44. I have considered the effects of the proposal upon the scheduled ONC ('Ohiwa Harbour') in the RPS. I am of the opinion that the proposal does not adversely

detract from the scheduled natural character elements and that the proposal is consistent with scheduled land cover and land use elements. Furthermore, I am of the opinion that the proposal will not adversely impact the prescribed perceptual values.

45. Overall, I do not consider that the values and attributes that make the ONC/ONFL “outstanding” are diminished by the effects of the proposed development.

Applicant's proposed alternative layout

46. In response to submissions and the S42a report, and the above assessment of potential effects on the wider landscape character introduced by the anticipated residential built form, the applicant has put forth an alternative proposal to reduce the number of additional vacant lots from 9 to 7. A landscape plan incorporating this alternative layout is included in Appendix 2.
47. At the western edge of the site (i.e. atop the ridgeline) the proposed number of lots would be reduced from 3 to 2, with the proposed lot 11 removed and the proposed lots 10 and 12 annexing portions of this lot. Future built form within the proposed lots 10 and 12 remain in the same positions as currently proposed. This amalgamation of lots reduces the presence of any future anticipated built form at the most prominent point of the site.
48. The reduction in the level of future built form is positive in comparison to the current proposal as it reduces the level of built form upon the ridgeline and allows for a greater amount of planting to be installed at this ridgeline. The greater amount of planting allowed through this proposal would allow for greater positive effects in the long term through a greater degree of naturalness to be able to be achieved through native planting.

49. In addition to planting at the western edge of the proposed lots 10 and 12, the eastern edge of these lots would receive additional tree planting, which in conjunction with any retained avocado trees would provide a higher degree of visual absorption to a 5m dwelling.
50. The reduced amount of built form upon the ridgeline allows for greater “breathing space” between future structures and reduces the effect of any 'clustering' that could be perceived as being an urban outcome.
51. The existing paddock (that will form part of lot 6) is proposed to receive a higher level of planting, particularly trees. Portions of the paddock have been retained in pasture to allow for the grazing of livestock by the future occupants of proposed lot 6.
52. At the eastern boundary it is proposed to merge the proposed lots 1 and 2 into one lot, with the proposed building platform remaining as per lot 2. This amalgamation of lots eliminates the presence of any future anticipated built form at the most visually prominent point at the eastern edge housing the proposed lots 1, 2, 3, 4 and 6.
53. The removal of this lot allows for a greater retention of avocado trees, which can potentially reduce the potential for adverse effects within the short term. The greater amount of space afforded at this juncture also allows for a greater amount of planting to be installed at this interface.
54. Proposed lot 14, which sits in close proximity to the proposed lot 1 will be supplemented with additional tree planting in conjunction with the proposed native shrub planting. This will provide additional benefits to the overall screening and softening of the existing development to the west, when viewed from positions to the east of the site.

Officer's report

55. I have read the planning officer's report and comment on the following points / issues raised by the planning officer with regards to the supplied visual simulations.
56. The applicant was requested, by Council on June 30th 2022, to provide visual simulations to obtain greater clarification on the proposal. Following discussions, 2 viewpoints from the Greenwood Landscape and Visual Assessment report were agreed upon, with a 3rd viewpoint agreed from within the Pā site reserve to the north of the site.
57. The three simulations were prepared and submitted to the C council on Friday 22nd July. There was a discrepancy between the focal lengths of 2 of the viewpoints (55mm) and the 3rd (35mm). This has been rectified in the current submitted set.
58. A fourth simulation was requested from an additional viewpoint at Ōhiwa spit on Monday 25th July. In my opinion this requested simulation would not provide significant additional information in terms of the appearance of the proposal within the landscape and would not greatly assist with assessing visual impacts of the development due to the level exposure of the site not being considered to be significantly varied from the supplied simulation from the Pā site, this decision was based on the aspect of the site visible within the scheduled viewpoint 9 of the landscape and visual assessment report, which sits at the same approximate bearing (albeit at a further distance from the site). Accordingly, it was not prepared.
59. As I have noted previously, a revised landscape visual simulation set has been prepared that addresses concerns in the S42a report over dotted lines of houses, height of buildings, base photo, focal lengths. and building footprint size and is attached at Appendix 3.

60. The previously submitted visual simulation package has been included to provide a comparator to what was supplied to council on 28th July and is attached at Appendix 4.

Conditions

61. I reviewed the consent conditions have the following response to those conditions that pertain to the landscape proposal.
62. I am agreement with the proposed condition 8 under the heading 'Stage 1 conditions'
63. I am in agreement with the proposed conditions 30, 33(i), (v), (vii), (viii), (x), (xii), (xv) under the heading 'Stage 2 conditions'
64. I am in general agreement with the proposed conditions 28, 33 (ix) and (xi) subject to the below:
- With regards to condition 28 I am in agreement with the majority of the condition with the suggestion that a provision be included that where eco-sourced plant stock is not available non eco-sourced stock may be used, this is to ensure the full implementation of all proposed plants in a single operation and to avoid any potential delays due to lack of eco-sourced supply.
 - With regards to 33 (ix) it is proposed to amend the minimum height to 4m, as this will absorb the majority of any future built form as per the suggested height restrictions.
 - With regards to 33 (xi) it is proposed to amended as per the proposed amendment for condition 28 outlined above.

65. With regards to condition 34 (xxi) it is proposed that 'X' be modified to 4-6m.

Conclusion

66. I acknowledged that the erection of built form has the potential to detract from the prevailing landscape character. The genesis of these effects is the future introduction of built form that will replace readily recognisable existing character elements in the form of shelter belts and the visible presence of built form in relative close proximity (in comparison to a traditional rural environment).
67. These effects will be more readily appreciated at the western edge of the site where the position of future anticipated built form upon the ridgeline will be more readily visible from within the wider landscape. I note that any proposed built form will be visible against the adjoining developments eventual built form.. Whilst these introduced effects will result in a change in the short term, the benefits in the long-term of establishing native vegetation over the site can be considered a net positive effect by introducing a greater naturalistic element to this portion of the ridgeline and to the wider landscape.

Christopher Philip Campbell

10th August 2022