

**BEFORE THE HEARING COMMISSIONER
APPOINTED BY THE SELWYN DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER Private Plan Change Request 80
OF

STATEMENT OF EVIDENCE OF BRONWYN ELIZABETH FAULKNER

ON BEHALF OF SELWYN DISTRICT COUNCIL

LANDSCAPE (& VISUAL)

27 September 2022

Introduction

- 1 My full name is Bronwyn Elizabeth Faulkner. I am an independent consultant landscape architect, contracting my expertise to Councils and private clients.
- 2 I am a New Zealand Institute of Landscape Architects' ("NZILA") Registered Landscape Architect and have Bachelors degree of Landscape Architecture and Agricultural Science.
- 3 Prior to my current role, I worked as a landscape architect for Boffa Miskell in the Wellington office for 15 years and the Christchurch office for three years.
- 4 My previous experience includes providing landscape expertise on a wide range of projects, in particular large scale infrastructure projects, subdivisions and restoration projects. My work included the preparation of landscape and visual assessments to support resource consent and plan change applications as well as design and project management roles during the design and construction phases of projects.

Code of Conduct for Expert Witnesses

- 5 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2014 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, 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 that I express.

Scope of evidence

- 6 I have I have been asked by the Selwyn District Council (SDC) to carry out a peer review of the *Urban Design, Landscape and Visual Impact Assessment (the Assessment)* provided as Appendix C1 of the application for Plan Change 80 (PC80). My review also considered the Applicant's responses to the Requests for Further Information and the submissions received.
- 7 My review is restricted to the landscape and visual aspects of the Assessment and proposal and I do not comment on urban form or urban design matters.
- 8 In preparing this statement of evidence I have reviewed the following documents:

- Private Plan Change Request Including s32 report- Updated in response to RFI
 - Further Information Request Response
 - Attachment 2 Outline Development Plan (ODP) Updated in response to RFI
 - Appendix C1 Urban Design, Landscape and Visual Impact Assessment. Updated in response to RFI (Prepared by DCM Urban Design Ltd)
 - Appendix C2 Landscape and Visual Impact - Graphics
 - Appendix C3 Typical Section
 - Appendix B Integrated Transport Assessment - Updated in response to RFI
 - Submissions raising landscape/visual matters
- 9 I am familiar with the Application Site (the Site) and surrounding area, specifically visiting it in November 2021 for my initial review and again in August 2022 to prepare this evidence.
- 10 I have recently had discussions with the Applicant's landscape architect, Mr Compton-Moen regarding the mitigation proposed for the Two Chain Road boundary of the site. Following our discussions Mr Compton-Moen has provided an amended Typical Section (27 September 2022). I understand the PC80 application has not yet been formally amended to include the amended Typical Section, but I have been advised that this will be done through the applicant's evidence, and that as such, my review has been based on the amended version (attached as Appendix 1 to my evidence).

Purpose of the Peer Review

- 11 The purpose of this review is to appraise the Landscape Assessment, rather than be a parallel assessment. My review follows the principals set out in recently approved NZILA Assessment Guidelines¹. Using the following headings;

1 2022. New Zealand Institute of Landscape Architects, *Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines*

- Appropriate methodology
- Existing landscape
- Proposal details
- Statutory planning provisions
- Landscape effects (including visual)
- Design response / Mitigation measures
- Recommendations
- Conclusions.

Appropriate Methodology

- 12 The Assessment contains a method statement, and detailed section on the assessment methodology used. The Assessment itself was structured thus;
- Description of the existing environment
 - Effects on Urban and landscape Character
 - Effects on urban and Landscape Values
 - Effects on Visual amenity
 - Mitigation measures
 - Conclusions
- 13 The components of the Assessment are generally consistent with industry best practice, noting that the Assessment was prepared prior to the adoption of the recent NZILA Assessment Guidelines² and was appropriately based on the previous professional guidance.

Existing Environment

- 14 Fully understanding the landscape context, character and values of the existing landscape is the foundation against which the potential effects of a proposal are assessed. The Assessment describes the urban and rural context of the wider area, local area and the Site itself in detail, including the rural and urban character concluding that *Overall, the receiving environment has a rural, semi-open character transiting to urban fringe/peri-urban (p11)*
- 15 The Assessment fully describes the existing environment's biophysical character including landform, landuse, buildings, vegetation, and

² *ibid.*

settlement patterns. However, it does not identify the settled nature of the adjoining rural area on Two Chain Road as being rural residential in character rather than simply rural. By my count there are 13 rural residential properties that front or have access onto Two Chain Road. A rural residential environment has a different character to open farmland and is potentially more sensitive to change of this nature and scale due to having a resident population.

Proposal Details

- 16 An accurate description of the future development scenario enables us to visualise the project and judge the nature and significance of the potential landscape effects and also assess the need for and effectiveness of any proposed mitigation measures.
- 17 The Assessment would have benefited from a more detailed description of the landscape related features/activity that would result from the changed land use such as building heights, density, setbacks, traffic entrances, heavy traffic movement, signage, lighting, noise, dust, and 24 hour activity. I acknowledge the Assessment relies on what the SDP provisions allow in Business 2A Zone to provide this, however given the potential effects are largely external to the Site it would help the Assessment process to fully visualise the changes that the proposal will introduce to the local area. I also acknowledge that some of the items listed above are beyond the scope of a landscape architect. However collectively they potentially impact on the rural amenity of the surrounding area.
- 18 The ODP shows two vehicle access points on Two Chain Road and one on Walkers Road. I understand that the Plan Change would enable three access points. SDC plans to widen Two Chain Road³ regardless of this Plan Change application. If the Plan Change is approved additional road widening will be required possibly including turning bays at the access points.

Statutory Planning Provisions

- 19 The Proposal has been assessed against the relevant provisions of the Township Volume of the SDP, recognising the Site's potential future zoning.

³ Item in the LTP 2028/2029

- 20 The rezoning proposal will effectively create a new industrial interface with adjacent areas along all but the short eastern boundary. To my mind the effects of the new activity on the relevant objectives and policies for the Rural Zone need consideration because these are still the outcomes sought for, and applying to, the adjoining areas, regardless of the rezoning of the plan change site. *Section B3.4 – Quality of the Environment*, in the Rural Volume deals with; *The effects of activities on the amenity values of the rural area – its character and quality of the environment and Reverse sensitivity effects*, effectively giving effect to s 7(c) and (f) of the RMA.
- 21 This matter was raised with the Applicant in the RFI. The Applicant confirmed that they did not consider the rural objectives and policies were relevant.⁴ Regardless, I consider that rural amenity and quality of the environment issues are pertinent to this Application and I discuss these below in my evidence.
- (a) Objective B3.4.1 *The District's rural area is a pleasant place to live and work in*. The explanation to this objective notes that it seeks to maintain the quality of the rural environment and is achieved by policies and rules to manage effects such as noise, vibration, outdoor signage; glare and odour.
- (b) Objective B3.4.2 seeks that a variety of activities are provided for in the rural area, and seeks to maintain rural character and avoid reverse sensitivity effects.

Assessment of Landscape Effects

- 22 The Assessment has considered the potential effects in terms of effects on rural character and visual amenity. As discussed previously I consider that the potential effects on the rural amenity (for Two Chain Road residents in particular), as addressed in the objectives and policies of Section B3.4 of the Rural Volume, are relevant to the assessment. While visual amenity has been assessed it is just one component of rural amenity.
- 23 I note throughout the Assessment the terminology *Magnitude of change*⁵ is used when defining the quantum of effects on visual amenity,

⁴ #10 in Response to RFI

⁵ refer page 7 in the methodology (based on the 7 point scale very low to very high)

landscape character, and nearby residents. I do not consider that magnitude of change is the same as the level of an effect on something. Change in itself is not an effect, effects are the consequence of change on landscape values, neighbours etc taking into account factors such as sensitivity/capacity to change, the nature and scale of the change and the condition of the existing environment.

- 24 I have assumed that the author has conflated the two terms and therefore, where reference to *change* is used in summary statements about the effects of the proposal, I have read *effect*.
- 25 It is also unclear why in relation visual amenity the terminology minor/less than minor is used⁶.
- 26 Permitted baseline activities have been taken into account when evaluating the effects of the proposal on visual amenity and rural character, for example;

Visual amenity effects- In determining the magnitude of change, activities which are possible in the Inner Plains Rural zone were taken into account to form the 'permitted baseline'⁷.

Rural character effects - For the rural properties on Two Chain Road, the rural character of the area will change with the Magnitude of Change considered to be Low-Moderate. This reflects the activities that are possible with the Inner Plains Rural area noting that large scale buildings up to 500m² in area and 12m in height are possible⁸.

- 27 Taking the permitted baseline into account is not really a relevant comparison in this situation particularly in regard to site coverage. Rule 3.11.1.1 limits site coverage in the Rural Inner Plains zone to 5% for sites larger than 1Ha. A development with large buildings occupying 5% of the Site will result in a very different type of built environment than could be constructed in a Business 2A zone, where there is no limit on density other than setback requirements. The existing industrial zone nearby demonstrates the scale and nature of the built environment possible in Business 2A zone, which is a much more intensive built environment than would be possible in the Rural Zone. I imagine that the Assessment's

⁶ Table 2 *Effects after mitigation*, and in summary of effects page 20

⁷ Refer 2nd para, 3.1.4 Landscape Assessment

⁸ Refer 2nd Para, section 3.2 p11 Landscape Assessment

apparent reliance on the permitted baseline comparison could have influenced (downplayed) the nature and magnitude of any effects resulting from the development of Business 2A zoned land.

Effects on Landscape Character

- 28 The Assessment states, *The proposed development will modify the landscape from one that is semi-open and agricultural in character to one that is characterised by large scale industrial warehouse buildings, large areas of hardstand and landscape planting.* I agree with this description of the changes that will occur within the Site. In addition to this, the proposal will have effects external to the Site that will impact on landscape character and rural amenity beyond all the boundaries of the Site. It is not clear to me that other than new buildings within the Site being visible, that other external effects of the proposal have been taken into account in the Assessment.
- 29 The Assessment concludes that *..For the rural properties on Two Chain Road, the rural character of the area will change with the Magnitude of Change considered to be Low-Moderate.*
- 30 I consider that the effects on the rural character of Two Chain Road would be greater than this when taking into account the significant changes the proposal will bring to its existing rural edge; namely the addition of multiple largescale buildings, signage, large scale road entrances, lighting, noise, 24 hour/day activity and the general bustle of increased movement and turning of heavy traffic.

Effects on Visual Amenity

- 31 The Assessment considers views from 14 locations (6 viewpoint photographs and 8 properties on Two Chain Road. (Refer table 2 of the Assessment). For some viewing locations the Assessment has considered 2 Visually Sensitive Receptors (VSR) who will experience the same view in differing ways. The 6 photo viewpoints have been selected as representative public locations from where the Proposal will be seen. I agree that the viewpoints are a good representation of locations.
- 32 The assessment concludes, in terms of visual amenity, *Adjacent residential properties overlooking the plan change area will have a mix of partial and screened views of the development. Changes experienced by these residents is considered Low given boundary treatment, existing width of Two Chain Road and the level of surrounding development which already exists.*

- 33 I agree that from the dwellings on Two Chain Road the Site is unlikely to very visible and the level of visual effects would be low. However, the change to the existing visual amenity in the Two Chain Road and Walkers Road corridors will be greater, in that the road environments will be more urban in character.

Conclusions about the Assessment of Effects

- 34 Overall, I consider the landscape and visual effects of the proposal would be more significant than the Assessment has found. As discussed previously the Plan Change will introduce new industrial built form and activity into the local area that would unavoidably impact on the rural character and amenity of surrounding area. I believe the Assessment's lower rating of effects relates to the fact that;
- (a) There is no evidence that the Assessment has considered all of the internal and external effects of the proposal that could impact on rural amenity and character;
 - (b) The Assessment clearly relies on the assumed the permitted baseline in weighing up the magnitude of the effects. If the basis of the permitted baseline assumptions overestimates the nature and extent of development permitted on the rural Site then this will have affected the outcome of the Assessment.
 - (c) The assessment has not considered the relevant Rural objectives and policies in terms of whether the effects of the rezoning will align with the outcomes sought for the rural zone.
- 35 I agree with the Assessment that the residents on Two Chain Road will be the most affected parties and therefore the proposed mitigation measures are focussed on reducing the effects for this community.
- 36 I consider that existing character and amenity along the Walkers Road and SH1/rail boundaries will also be impacted. While these adjoining areas may not be as sensitive to change as Two Chain Road, due to their more developed/less rural character, the effects of a new Business zone still need to be managed to ensure the amenity values of the adjoining areas are maintained.
- 37 Walkers Road will certainly become more urban in nature through the combination of road and intersection upgrades, more traffic and the ability to access to individual properties in the Site. Based on this I agree that the 3m wide planted strip provided for in rule C16.1.2.1 is appropriate for this road frontage.

Design Response / Mitigation measures

- 38 Three mitigation measures are proposed⁹ *to either avoid, remedy, or mitigate any potential effects on Urban Design, Landscape Character, Landscape Values and/or Visual Amenity from the proposed Plan Change* in summary they are:
- (a) MM1- Landscape Treatment along the Two Chain Road boundary, detailed in Appendix 3C Typical Section. Mr Compton-Moen has provided me with an amended Typical Section (refer Appendix 1 to this evidence), which as noted earlier, I understand will be formally provided through the Applicant's evidence. This includes a 15m wide mitigation strip, comprising the existing row of trees, space on the south side of the trees for maintenance and a 2.5m high planted bund. I have commented below on this version, rather than that contained in the original application.
 - (b) MM2- The number of public roads/access points off Two Chain Road is limited to three.
 - (c) MM3- A shared pedestrian cycle path is formed along the Two Chain Road and Walkers Road frontage to provide connectivity.
- 39 **MM1-** The value of the existing trees along the Two Chain Road boundary as effective mitigation cannot be overstated. Their scale and capacity to screen views into the Site are proportional to the nature and scale of the development that would occur within the Site. I agree that this existing vegetation should be both retained and enhanced. Enhancement will require that the gaps that currently exist be planted with trees of similar stature to the existing species (pine, macrocarpa, and cypress).
- 40 In the amended Typical Section a 5.0m wide strip is shown to contain the existing trees and *sufficient space for the maintenance of the existing trees/hedges*. Given the species and size of the existing trees, I anticipate that maintenance would involve regular trimming to manage the width of the tree canopy. I question whether the 5.0m width in the Typical Section is sufficient to accommodate both the existing trees and access for a mechanical hedge trimmer. I therefore recommend that either additional space is required or the bund be somehow amended to provide suitable access for a hedge trimmer.

⁹ refer section 4, p 20 of the Landscape Assessment, Appendix C1

- 41 A 15m wide mitigation strip will result in a 55m wide separation between the Two Chain Road property boundaries and the built edge of the Site (combined width of 40m wide road corridor, 15m boundary setback). The mitigation strip will provide two lines of vegetation and a 2.5m high bund which will combine to visually screen views into the Site from Two Chain Road, and also reduce impacts on rural character from activities within the site.
- 42 **MM2-** Minimising the number of access locations onto Two Chain Road is a key mitigation measure. The activity of more vehicles and heavy traffic accelerating, decelerating and turning in and out of the Site will have a significant impact on the rural character and amenity for the local community, more so than if traffic was just passing traffic.
- 43 I recommend that there be only one vehicle access point onto Two Chain Road, at the eastern end close to the existing industrial area. This would effectively internalise the traffic within the Site and reduce the effects on rural amenity that multiple entrances would have on the adjacent rural residential properties.
- 44 **MM3-** The addition of a cycleway will have connectivity benefits for the community but does not provide any direct mitigation of the effects resulting from the Plan Change on the local landscape.

Additional Mitigation Measures

- 45 In addition to the proposed mitigation on Two Chain Road I consider there is also a need to minimise adverse impacts on other adjacent communities and ensure any new industrial development on the Site provides a long-term and positive contribution to the Rolleston townscape. I recommend that mitigation, in the form of planting and retaining existing trees, should be undertaken along the boundaries with, Rail/SH1 corridor and at the eastern end of the Site.
- 46 **Boundary with Railway/SH1-** There is a 40m wide buffer, including the railway, between the Site boundary and SH1. Between Walkers Road intersection and Rolleston Drive the buffer is relatively densely populated with trees between SH1 and the railway. Further north between Rolleston Drive and the end of the Site the buffer width reduces to about 20m and there are no trees between the Site and SH1. I consider mitigation planting should be established on the Site along this boundary to visually screen the approximately 2km long interface with the road/rail corridor. This section of SH1 is a gateway approach to Rolleston and as such the long-term visual amenity of the corridor should be maintained or enhanced. In addition, once the Walkers Road/SH1 intersection is

upgraded, the new roundabout will effectively become a threshold to Rolleston for traffic from the south, and the traffic will be travelling slower.

- 47 Given the nature and scale of the potential buildings and structures on the Site I consider that at least Landscape Treatment 4¹⁰ requiring a minimum 5m width of planting with mature height of 8m would be appropriate and could also include the retention of the existing trees. Gaps in the planting may be required to provide rail sidings to the in the future, but these would be relatively short sections of the 2km long boundary.
- 48 **Eastern end boundary.** The existing row of eucalyptus trees along the short curving eastern boundary are highly visible from SH1 and provide a strong natural contrast to the otherwise built environment. If the Site also becomes an industrial area, established substantial trees such as these will become all the more important in the urban setting. If retained they will provide further visual screening of the new industrial area and provide a green visual break in a 3.0 km long stretch of industrial development between Walkers and Hoskyns Roads.

Recommendations

- 49 Restrict Site access on to Two Chain Road to one entrance, located at the eastern end of the Site. I consider this is an essential measure to minimise the adverse impact for the residents on Two Chain Road.
- 50 Two Chain Road landscape treatment;
- (a) The following notes should be added to the amended Typical Section in relation to the existing trees/hedge to ensure they provide effective mitigation in the long term.
- (i) Gaps in the existing treeline should be planted with species of the same stature (eg. macrocarpa, cypress, pine).
- (ii) The trees need to be managed and maintained to provide dense visual screening of at least 8m in height.
- (iii) Dead or dying trees should be replaced as required.

¹⁰ Rule C24.1.3.13 Township Volume

- (b) Revise the Typical Section to demonstrate how the width of the existing trees and access for a mechanical hedge trimmer can be accommodated.

- 51 Rail/SH1 boundary landscape treatment - Landscape Treatment 4¹¹
- 52 Eastern boundary landscape treatment - retain and maintain the existing trees on the curved boundary, replace as required with same species or similar stature trees.
- 53 The above detail should be included in the ODP =.
- 54 Regarding my recommendations - I recognise the practicality and logic of using existing SDP provisions where possible. However, to achieve effective mitigation landscape treatments need to be designed to be specific to their location and purpose.

Submissions

- 55 I have reviewed the seven submissions that raised matters relating to quality of the environment and reverse sensitivity.
 - Ara Poutama (PC80-0002) Department of Corrections - Rolleston Prison
 - S. Scott (PC80-P0003) 1/316 Two Chain Rd
 - New Zealand Defence Force (PC80-0005) Burnham Military Camp
 - Oranga Tamariki (PC80-0006). Te Puna Wai o Tuhinapo
 - D & H Fraser (PC80-0008) #156 Two Chain Road;
 - D. Middleton (PC80-0010)) Joint submission from 11 Two Chain Road residents.
 - J. Horne (PC80-0011).
- 56 The submissions raise similar and overlapping issues relating to the quality of the environment including; Impacts on surrounding lifestyle properties (particularly on Two Chain Road), effects on the rural character and amenity of the surrounding area, visual effects of industrial buildings being located opposite rural zoned Site, and the change the development

¹¹ Rule C24.1.3.13 Township Volume (minimum 5m width of planting with mature height of 8m)

will have on the current rural outlook and environment, visual effects of traffic, glare and light pollution.

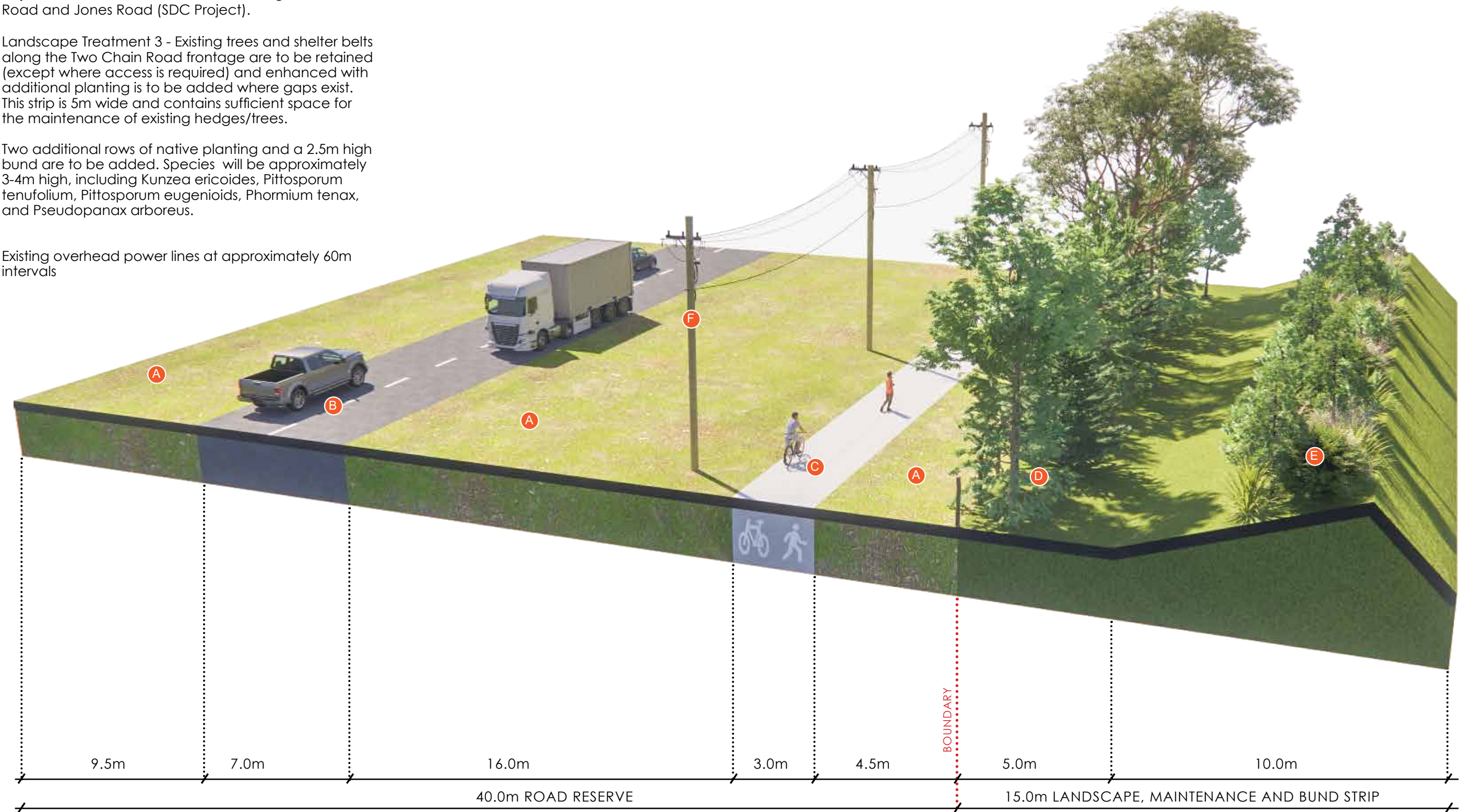
- 57 I have addressed these effects above, including my recommendations for additional mitigation that would further reduce the effects of the Plan Change.
- 58 The submission from D & H Fraser, requests additional mitigation measures in relation to Two Chain Road, including an increased landscape strip, greater controls and/or a cross section applied within that strip, an earth bund and acoustic fence and a 75m road boundary setback.
- 59 The submission requests a wider landscaping strip along Two Chain Road. The amended Typical Section shows a 15m wide strip to accommodate the existing trees, a bund and a secondary row of planting. I consider the amended Typical Section improves the effectiveness of the originally proposed mitigation.
- 60 A building setback of 75m is requested in the submission. From a landscape perspective a wide setback is desirable to provide green open space, physical buffers between activities, and space for bunds, planting and other community benefits. The Applicant now proposes a 15m wide setback, together with the road corridor this will separate the industrial activity from the Two Chain Road properties by 55m and also includes two rows of planting and an earth bund. In addition, I have recommended there be no vehicle access to the site opposite these properties, as I discuss above, round the clock activity associated with traffic entering and leaving an industrial area will significantly impact on the rural amenity and character of the road corridor and adjoining properties.
- 61 The submission from D & H Fraser challenges the validity of the comparison of permitted development between the Rural zone and Business 2A zone as used in the Assessment. I agree with the points raised in the submission and I have discussed above how reliance on an unrealistic permitted baseline could influence the findings of the Assessment.

Bronwyn Elizabeth Faulkner

Dated this 27 day of September 2022

LEGEND

- A Existing grass berm within the road reserve
- B Existing formed road (Two Chain Road) with a speed limit of 100km/h
- C Possible Shared pedestrian and cycle path running adjacent to Two Chain Road, connecting to Walkers Road and Jones Road (SDC Project).
- D Landscape Treatment 3 - Existing trees and shelter belts along the Two Chain Road frontage are to be retained (except where access is required) and enhanced with additional planting is to be added where gaps exist. This strip is 5m wide and contains sufficient space for the maintenance of existing hedges/trees.
- E Two additional rows of native planting and a 2.5m high bund are to be added. Species will be approximately 3-4m high, including Kunzea ericoides, Pittosporum tenuifolium, Pittosporum eugenoides, Phormium tenax, and Pseudopanax arboreus.
- F Existing overhead power lines at approximately 60m intervals



A. TYPICAL ROAD RESERVE SECTION AND LANDSCAPE TREATMENT

TWO CHAIN ROAD FRONTAGE - TYPICAL SECTION

ROLLESTON INDUSTRIAL DEVELOPMENTS LIMITED - TWO CHAIN ROAD (PC8) PLAN CHANGE