

5 March 2024

To follow is my response to landscape relevant evidence tabled so far at the hearing, ending 5pm Monday 4 March 2024. Subsequent matters arising will be responded to verbally.

1 Applicant's landscape evidence (Amanda Anthony)

- 1.1 I agree with the amendments shown in the 'Revised Landscape Mitigation Plan'.¹
- 1.2 Ms Anthony also elaborates on what constitutes rural openness.² The focus of her discussion is on what can reasonably be expected to occur within the permitted baseline, citing farm accessory buildings and structures such as tunnel houses, crop protection supports and so on. Subject to setbacks none require additional mitigation. Forestry is also mentioned, as this too diminishes openness. I accept that, apart from forestry, the 110ha site coverage arising from the proposed physical activity would be unlikely for other permitted activities.
- 1.3 Notwithstanding how openness is delivered via the District Plan, current openness of the site would be lost through implementation of the proposal, as would any views across or through it. The loss of openness would arise from the physical presence of the solar array that in turn will be screened by the proposed and existing planting. So, I consider it a combined landscape and visual effect.
- 1.4 To reiterate my evidence, neither District Plan defines 'openness'. Instead, the rural standards determine what is expected – for the most part controls on site and building density. I understand the solar array is defined a utility rather than building, and so it would appear that with regard to the outcomes sought by the District Plans, openness will be maintained.

¹ Paragraph 3.6 and attached Figure B plan.

² Paragraph 10.3 (b)(c)(d)(d)

- 1.5 Regarding the occlusion of views by buildings, shelter belts, and other tree planting such as forestry, I note that the District Plans make no provision for the protection of views.
- 1.6 Buildings are generally permanent features, whereas utilities harbour the potential for removal. Therefore, the opportunity for reinstatement of open pasture or cropping land is not entirely lost, although I acknowledge that this may not occur for many decades.

2 Mitigation plant species

- 2.1 The issue here is whether exotic or native plants should be used for mitigation planting. Essentially it is a question of what plant type will achieve screening fastest? Ideally, while the native plants are preferable for their diversity and better ecological outcomes, the exotics will be faster growing and therefore will provide significantly quicker screening. They would also achieve complete screening from ground level up.
- 2.2 There may be scope to introduce native vegetation in addition to the exotics, but I believe this is an option that may not be practical due to site constraints.

3 Submitter's evidence

- 3.1 In addition to pre-circulated submitter's evidence, the evidence tabled by Mr **Clark Casey** identified a number of landscape matters meriting response. But firstly I want to respond to the planning evidence of **Mr Stewart Fletcher**.³
- 3.2 Regarding landscape amenity effects **Mr Fletcher** concludes that the '*The enclosing of the site itself creates an amenity different to that of the surrounding area, and it will stand out significantly within the surrounding environment.*'⁴ He observes that existing shelter belts in the area '*...are typically of a paddock based length breaking areas apart, compared to the entire length of a boundary.*' Consequently, this pattern enables '*...partial*

³ Planner for Brookside submitter's group

⁴ Paragraph 18

*views across rural areas.*⁵ He notes also that the site ‘...will eventually be replaced by thick hedging which will conceal the site.’⁶

- 3.3 My observation is that the extent and location of shelter belts in the area are variable, as are the views between them. And that many of them occupy the entire road boundary of rural properties. As far as I am aware, neither District Plan imposes restrictions on the location and extent of shelter belts. Additionally, there is no District Plan requirement to take into account the pattern of shelter belts in the rural zones as a factor meriting consideration of effects. In this regard they are a permitted activity (Partially Operative District Plan – GRUZ R25) that contributes to the landscape character of the existing environment. Therefore, it is my opinion that the shelter belt planting proposed by the applicant is entirely appropriate.
- 3.3 Also raised is the issue of amenity effects on local residents.⁷ As determined by the applicant’s landscape architect (Ms Amanda Anthony), there will be no more than minor adverse amenity effects beyond the site boundary due to the presence of existing and proposed vegetative screening. I agree that this will be the case.
- 3.5 Allied to the matter of shelter belt planting **Mr Casey** expressed concern that this will encourage birds and therefore subsequent crop damage. I accept that trees and shrubs do attract birds. As I have already noted, there is no District Plan restriction governing the location and extent of shelter belt planting. Nor is there any District Plan restraint on the establishment of forestry, woodlots, orchards and amenity planting all of which harbour the potential to attract birds. Consequently, all rural landowners enjoy the right (as a permitted activity) to plant such vegetation without restraint, in so doing will maintain rural landscape character and amenity.
- 3.6 A further matter raised by **Mr Casey** concerns the rate of growth of the proposed mitigation planting. The applicant’s landscape architect (Ms Amanda Anthony) informs me that the ground for the mitigation planting will be properly prepared and subsequently irrigated. Further, my research

⁵ Paragraph 17

⁶ Paragraph 18

⁷ Paragraphs 20 - 21

indicates that the proposed plant species (*Cupressus x ovensii*) is a very rapid grower, capable of more than one meter of growth per year. It is also extremely hardy and disease resistant. I am therefore very confident that the proposed 2m high plantings will achieve the desired height within two years and the PB3s (to be planted behind existing shelter belt) within 5 years.