

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 2 to the
Hamilton City District Plan – Te Awa Lakes
Private Plan Change

**SUMMARY AND STATEMENT OF REPLY EVIDENCE OF BRAD COOMBS ON
BEHALF OF
FONTERRA LIMITED**

URBAN DESIGN, LANDSCAPE AND VISUAL

1. INTRODUCTION

- 1.1 My name is Brad Coombs. I am a Principal at Isthmus Group Ltd (Isthmus).
- 1.2 I prepared a statement of evidence in relation to the urban design and landscape and visual effects of the Te Awa Lakes Private Plan Change 2 (PPC2), dated 18 November 2019. I have the experience and hold the qualifications set out in that statement.
- 1.3 I re-confirm my adherence to the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and I agree to comply with it.

2. EXECUTIVE SUMMARY

- 2.1 The Horotiu / Te Rapa North industrial area has been planned and provided for as part of the growth of Hamilton and Waikato through District and Regional planning processes over more than four decades. In urban design and landscape effects terms, it makes sense to plan for and to separate industrial activities from sensitive land uses, such as residential.

- 2.2 Heavy industrial activities and sites require a strategic approach to planning, at a whole of city scale, in order to manage the inevitable effects on sensitive land uses, such as residential areas.
- 2.3 The PPC2 site is less well connected than each of the planned residential growth nodes in Hamilton City.
- 2.4 The PPC2 site is disconnected from other residential communities and is the furthest location from the southern centre of the Hamilton City territory.
- 2.5 Heavy industrial activities generate effects on the amenity of residential communities that are not well understood by those communities and are therefore best separated from those sensitive activities by considerable buffering and distance.
- 2.6 The PPC2 proposal will have considerable internal amenity, however, when considered in the context of the existing and future SH1 and Te Rapa Road northern entrance experiences into Hamilton City, will not have a considerable bearing on entrance experience of the road journey from the north.

3. LOCATIONAL ISSUES

- 3.1 On Monday, in response to my statement of evidence, Mr Broekhuysen pointed out that I had stated that the location of PPC2 is inappropriate for residential land use. Ms de Lambert made similar assertions in her statement in reply and in response to questions.
- 3.2 I have checked my primary statement and I have qualified my statements in relation to the appropriateness of the PPC2 site for residential land use by comparing the location of the PPC2 site to the locations of the other urban growth nodes within the Hamilton City area. The Hamilton Urban Growth Strategy (HUGS) considers and plans for urban growth at a city-wide scale and promotes a compact city. Therefore, the territory of the city is the immediate comparison that I have for considering the allocation for residential growth within the boundaries of Hamilton City.
- 3.3 The land on the north west side of the expressway was highlighted by Mr Broekhuysen on Monday as being an adjacent land use which provides a like for like land zone context to the development of the PPC2 site. I note that this is a zoning within the Proposed Waikato District Plan and has some way to go before being re-zoned, or eventually developed.

- 3.4 I note in paragraphs 24 to 26 of the Joint Witness Statement on Economic and Strategic issues that the PPC2 site is not required to accommodate the future planned residential growth of Hamilton city as sufficient allocation is available in other areas.
- 3.5 Therefore, when I considered the PPC2 site in relation to the existing residential land available at Rototuna, Ruakura, Rotokauri and the Peacocke block in urban design terms, it is my opinion that the PPC2 site is the least appropriate location for residential development within the Hamilton City boundary, based on its' distance from the centralised services in the southern part of the city, it's location at the northern end of a long planned and protected industrial zone and the allocation of other residential land within Hamilton City¹.

4. GATEWAY EXPERIENCE

- 4.1 The other main area where Mr Broekhuysen and Ms de Lambert and I part company in terms of our opinion is in relation to the gateway experience that the Te Awa Lakes development would provide for road users entering the city from the north.
- 4.2 In response to questions on Monday, Mr Broekhuysen offered as the key components of the Te Awa Lakes proposal that contribute to the northern entrance experience from SH1;
- The Lakes;
 - The water adventure park;
 - The open spaces; and
 - The mixes of use and density.
- 4.3 I agree that these larger-scale landscape elements will have the greatest impression on the entrance experience, as they will become part of the large-scale landscape compositions that I described in my primary evidence. Finer grained residential scale streets and houses will have less of an impression.
- 4.4 While being promoted by Mr Broekhuysen as critical elements of the landscape gateway experience for southbound traffic, the lakes, the water adventure park and their key open space relationships recede back into the internal and

¹ See Attachment 1 to my primary statement.

southern parts of the site where they meet, away from the SH1 boundary². These large-scale landscape elements would have more of an impression on the gateway experience if they had been aligned with SH1, instead of residential area E³.

- 4.5 As set out in my primary statement of evidence, it is my opinion that the gateway and the linear entrance way experience into the north end of Hamilton will be dominated by the landforms and plantings associated with the SH1 and Te Rapa Road and the existing and future industrial development which is of a much larger scale, extending for much of the distance towards the centre and the residential periphery of Hamilton City on both sides of SH1 and Te Rapa Road.
- 4.6 The internal arrangement and design of the lakes, the water adventure park and the open spaces do not maximise their impression on visitors coming to the city from the north.
- 4.7 The main point from my primary evidence in relation to the suggestion that Te Awa Lakes will become a gateway to the city, is that the residential component of the Te Awa Lakes development proposal does not add any value to the gateway experience, in fact it is the non-residential components, as mentioned by Mr Broekhuysen that will become the critical elements.

Brad Coombs
27 November 2019

² See pages 22 and 25 of Mr Broekhuysens primary statement.

³ See Figure 4 in Mr Broekhuysen's primary statement of evidence.