

IN THE MATTER of the Resource Management Act 1991

AND

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

**STATEMENT OF REPLY EVIDENCE OF RACHEL VIRGINIA DE LAMBERT FOR THE
APPLICANT**

(LANDSCAPE AND VISUAL)

23 NOVEMBER 2019

1. INTRODUCTION

- 1.1 My full name is Rachel Virginia de Lambert. My qualifications and experience are as set out in section 1 of my primary statement of evidence dated 29 October 2019.
- 1.2 I reconfirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and to the extent that I am giving expert evidence, have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

2. SCOPE OF EVIDENCE

- 2.1 I have been asked to respond to the primary evidence of Brad Coombs for Fonterra Ltd in support of its submission on Proposed Plan Change 2 to the Operative Hamilton City District Plan: Te Awa Lakes (PPC2).
- 2.2 I respond below to those matters raised by Mr Coombs in relation to my landscape and visual effects assessment. A response to Mr Coombs' comments on the urban design effects of the proposal are covered in the reply evidence of Mr Broekhuysen. Drawing on my considerable practical experience and recognised urban design roles including on Auckland's Urban Design Panel, I also comment in respect of a number of urban design matters to provide my particular opinion in response to matters raised by Mr Coombs.

3. RESPONSE TO SUBMITTER EVIDENCE

Fonterra – Brad Coombs

- 3.1 In his statement of evidence, Mr Coombs makes a number of points which require a response.
- 3.2 I respond to each of those by reference to the relevant paragraph number in that statement.

Paragraph 2.2

- 3.3 At paragraph 2.2, in his Executive Summary, and repeatedly throughout his evidence Mr Coombs provides an opinion that PPC2 is an inappropriate location for residential

development due to its distance from the Hamilton CBD (11.4km). I consider this to be flawed analysis for two reasons:

- a) Firstly, I do not consider Hamilton as a city functions on the basis of radial distance from the historical CBD. In fact, this is seldom if ever a present day consideration as to the appropriate location for urban growth. As Mr Coombs notes, the Waikato University lies to the south of the city, not in its centre, and the city's main retail destination now lies to the north at Te Rapa in Te Awa / The Base.
- b) Secondly, this analysis ignores the wider context of urban growth including residential growth immediately to the north in Waikato District and the entire Hamilton to Auckland (H2A) growth corridor. It is a convenient argument for Mr Coombs to suggest there is some constraint on distance from the CBD as a factor in determining whether a location for residential development may be appropriate but in a rapidly growing urban region it is not, in my opinion, a relevant factor.

Paragraphs 4.10 – 4.16

- 3.4 At paragraphs 4.10 to 4.16 Mr Coombs discusses the 7 'c's' of the Urban Design Protocol (UDP), much of this lies within the realm of Mr Broekhuysen's urban design evidence. However, in discussing **Context**, at paragraph 4.12 Mr Coombs states "the UDP emphasises urban design builds on existing landscape context and character and supports development that fits within and enhances its surroundings". He suggests that the "residential component of PPC2 would be completely out of context with the existing and future landscape context for the site". The landscape context of the PPC2 site includes a long frontage to the Waikato River, a significant landscape and cultural feature of the city and region. Across the river, the land use is lifestyle residential in character and across the Expressway to the north in Waikato District, the land is zoned for residential development. Furthermore, there is additional future residential zoned land / growth cells (HT1) across the River, which in the long term will be included within the Hamilton metropolitan boundary. It seems Mr Coombs is choosing to only consider part of the site's context.

- 3.5 In addition, I do not consider, given the opportunity to reconsider past zoning, that industrial landuses provide an appropriate contextual interface with the Waikato River. It is my opinion that PPC2 will enable a far better landscape response to the important Waikato River landscape context.

Paragraphs 5.9 – 5.14

- 3.6 Mr Coombs discusses Reverse Sensitivity and Compatibility of Landuses at paragraphs 5.9 – 5.14. He notes, and I agree, that in addition to visibility, reverse sensitivity can be generated as a result of effects such as “odour, noise and the visibility of particular activities (eg venting), that would have more specific effects on the amenity of local residents than just the visibility of a building or development.” Setting aside that fact that the Fonterra site already interfaces with more proximate residential neighbours across the River in the Countryside Living zone in the Waikato District, I remain of the view that future residents within the PPC2 area will be alerted to the presence of the Fonterra factory as experienced from Te Rapa Road and a wider catchment in respect of the prominent dryer building. That building will have some visibility in the distance from the PPC2 area. There can be no suggestion that someone considering living in this residential area could claim that they were unaware of the Fonterra factory up the road before they purchased or decided to live in the area.

- 3.7 Given this, and the intent to address the potential for reverse sensitivity effects, the layout of PPC2 has increased the buffer and screening between residential activities and Fonterra, with the proposed Business Zone land along Hutchison Road enabling taller (10m) development which will have both visual and acoustic screening effects. I remain of the opinion that reverse sensitivity effects arising from lawful attributes of the Fonterra factory, including ephemeral effects, visual effects and acoustic (to the extent that I understand buildings will mitigate potential noise) effects will be largely avoided, and if not avoided, then certainly minimised.

Paragraphs 5.15 – 5.21

- 3.8 Mr Coombs discussed the ‘gateway’ concept of PPC2 at paragraphs 5.15 to 5.21. He considers the current arrival into / out of Hamilton on this stretch of the Waikato Expressway to comprise large scale ‘landscape compositions’ / large scale landuses. However, I note that the land on the opposing side of SH1 from Te Awa Lakes in Waikato

District is zoned for residential development such that with PPC2 there would be a symmetrical framing of the highway between the Waikato River bridge with its Pou and the Te Rapa Road interchange.

- 3.9 Furthermore, Mr Coombs rather fails to see the wood for the trees. He focuses on the 'fine-grained' nature of residential development rather than the very distinctive urban form of development proposed which is centred around waterbodies, connected wetlands and open space that structure the form of the future residential community. It is this larger scale form of development that will be most evident for people travelling on the Expressway. I am in no doubt that the framework plan associated with PPC2 and its blue and green open space attributes will lead to a very distinctive, quality gateway entrance as part of the arrival into Hamilton coupled with the transitional marker point of crossing the Waikato River.

NZTA – Robert Swears

- 3.10 At paragraph 11.2 Mr Swears sets out his opinion that "to screen the Lake and Adventure Park from close visibility it may be necessary for screening to be provided along the Waikato River boundary of the Site as well as along the Waikato Expressway boundary to the Park". Mr Apeldoorn has responded to the need for such screening in his evidence in reply, however, from a landscape and visual perspective I consider what essentially amounts to the entire screening of the site to be an over-reaction.
- 3.11 The Waikato River is also visible from the Expressway and boats use the river for water transport. All nature of rural, roadworks and industrial activities are visible from the SH1 corridor, but these activities are not required to be fully visually screened.
- 3.12 Whilst I accept some screening of water based activities within the Adventure Park may be appropriate I consider it entirely unnecessary and inconsistent to suggest that the lakes and amenity landscape they contribute to the site / Expressway experience should be required to be visually screened completely.
- 3.13 As a frequent driver of this Expressway I also consider visual interest is essential to the driving experience and enhances the travel experience.

4. CONCLUSION

- 4.1 In conclusion, it remains my opinion that PPC2 will achieve the long term enhancement of the landscape character and qualities of the 62ha Te Awa Lakes site resulting in the enhancement of the visual amenity of the site and its relationship with the Waikato River, SH1 Waikato Expressway and wider surrounding area. I consider the landscape and visual effects resulting from the implementation of PPC2 will be largely beneficial in nature with generally low, if any, adverse effects. Nothing presented in the evidence of Mr Coombs for Fonterra Ltd has given me cause to reconsider that position.

Rachel Virginia de Lambert

23 November 2019