

Before the New Plymouth District Council

Independent Hearing Commissioners

PPC18/00048

Under the Resource Management Act 1991 (**RMA**)

In the matter of an application by Oakura Farm Park Limited to vary or cancel Condition 4 of Consent Notice Instrument No. 9696907.4 on Lot 29 DP 497629

And

In the matter of Proposed Private Plan Change 48 to the New Plymouth District Plan requested by Oakura Farm Park Limited for the proposed rezoning of land at Wairau Road, Oākura

Statement of Evidence of Peter Kensington

(Landscape and Visual Effects)

on behalf of:

Matthew Peacock; Richard Shearer; Steven Looney; and Wayne Looker

25 June 2019

1 INTRODUCTION

1.1 My name is Peter Noel Kensington.

1.2 I am a consultant landscape architect and planner engaged by Matthew Peacock, Richard Shearer, Steven Looney and Wayne Looker to provide landscape architectural professional services in relation to these matters. My landscape architectural evidence is provided to support their submissions and those submitter's supporting them (**Submitters**).

2 QUALIFICATIONS AND EXPERIENCE

2.1 My relevant qualifications include honours degrees in landscape architecture¹ and in regional planning².

2.2 I am a Registered member of the New Zealand Institute of Landscape Architects (**NZILA**) and a Full member of the New Zealand Planning Institute.

2.3 I have been an elected member of the national executive committee of the NZILA³, holding the office-bearing role of Treasurer. I was again appointed to the executive committee as a proxy member for twelve months between 2016-2017. I am on the judging panel for the current NZILA awards.

2.4 I have worked as a landscape architect and a planner for twenty-two years. I am currently a director of KPLC Limited (**KPLC**), a consultancy providing professional landscape architectural and planning services.

¹ Bachelor of Landscape Architecture, 1995, Lincoln University (Canterbury).

² Bachelor of Regional Planning, 1993, Massey University (Palmerston North).

³ During the 2011-2013 term.

- 2.5 My landscape architectural work is primarily focussed within the landscape planning speciality of landscape architecture, where an assessment of effects on natural character, landscape and/or visual amenity values is required to inform statutory or non-statutory processes.
- 2.6 Throughout my professional career, I have provided expert landscape architectural advice in relation to many matters where an assessment of the effects of proposed subdivision and development on the landscape, natural character and visual amenity values of rural and coastal environments is required⁴.
- 2.7 I have resided for ten years with my family in a modest bach within the Muriwai Beach community, which is a place that has many similarities to the Oākura village.

3 EXPERT WITNESS CODE OF CONDUCT

- 3.1 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2014.
- 3.2 I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the New Plymouth District Council (**Council**) independent hearing commissioners.
- 3.3 I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where I state I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

⁴ Refer **Appendix 1** for a list of my relevant experience.

4 EXECUTIVE SUMMARY

4.1 In my opinion, the consent notice which is imposed on Lot 29 DP 497629 should not be varied or cancelled. This legal instrument is successfully protecting the landscape (rural) character over the balance of the land which was subdivided for 'The Paddocks' thirty lot subdivision⁵, providing for twenty-six large lot residential properties. The consent notice is one of the key measures imposed on the resource consent, via conditions, which mitigates the actual and potential adverse landscape and visual effects of that subdivision.

4.2 In addition to the importance of the consent notice, the anticipated layout of urban development that would be enabled by Proposed Private Plan Change 48 to the New Plymouth District Plan will result in significant adverse landscape and visual effects and is, in my opinion, inappropriate because:

4.2.1 It will not successfully integrate seamlessly with the existing Oākura landscape;

4.2.2 It severs key landscape features of importance, including an esplanade strip and a Key Native Ecosystem (**KNE**) area;

4.2.3 It does not provide for a logical integration (physically or visually) with potential future urban development as anticipated under the Council's 2006 Oākura Structure Plan;

4.2.4 Significant adverse landscape and visual effects, at both a macro and detailed scale, will

⁵ As enabled through resource consent RC 45196 which was granted by the Council on 8 March 2011.

arise from the urban development that would be enabled; and

4.2.5 It has received considerable community opposition through submissions which raise issues relating to the potential for adverse landscape and visual effects to arise.

4.3 In addition to the above reasons, it is my opinion that the proposed rezoning will not achieve the purpose of the RMA and will not give effect to the relevant statutory provisions⁶ within the Regional Policy Statement for Taranaki (2010) or the New Plymouth District Plan (2005) which relate to the protection of the landscape and the avoidance of adverse landscape and visual effects from inappropriate subdivision and development.

5 INVOLVEMENT WITH THE PROPOSAL

5.1 In February 2019, I became aware of the application to vary or cancel Condition 4 of Consent Notice Instrument 9696907.4 on Lot 29 DP 497629 (**the application**) and the request for Proposed Private Plan Change 48 to the New Plymouth District Plan⁷ (**the request**).

5.2 The Submitters formally engaged KPLC in March 2019. At that time, I reviewed the documentation setting out the application and the request, including the supporting expert assessments. I also reviewed the submissions and further submissions made to the Council.

5.3 I am generally familiar with the New Plymouth district and the Taranaki region, however, for the specific

⁶ Refer those listed at **Appendix 2**.

⁷ New Plymouth District Council Reference 'Wairau Road, Oākura Rezoning – PPC18/00048'.

purpose of my involvement with this matter, I visited Oākura on 21 and 22 March 2019. During this visit, in order to gain an appreciation of the context for the application and the request, I spent time walking around the village, the beach and the Kaitake Ranges⁸. I also viewed the proposed rezoning area from Ahu Ahu Road, South Road (State Highway 45 (**SH45**)), Wairau Road and the track which provides existing public access between South Road (SH45) and ‘*The Paddocks*’ properties along the existing esplanade strip adjacent the Wairau Stream tributary and McKie QEII Covenant.

6 SCOPE OF EVIDENCE

6.1 My statement of evidence addresses a variety of matters, which are within my area of expertise and which all relate to the following key topics and issues:

6.1.1 The adverse landscape and natural character⁹ effects of the proposed urban development;

6.1.2 The adverse visual effects of the proposed urban development on the amenity values of people that have and experience an outlook towards the area of proposed rezoning; and

6.1.3 The adverse effects of the proposed urban development on rural character.

6.2 In preparing my evidence I have considered the:

⁸ I walked to ‘Goat Rock’ via the track from Wairau Road to experience the outlook.

⁹ In my opinion, the area of proposed rezoning is located within the coastal environment (New Zealand Coastal Policy Statement (**NZCPS**) Policy 1), however, given the area’s physical separation from the coast, I have primarily assessed the effects of the proposed urban development on natural features and natural landscapes (NZCPS Policy 15(b)).

- 6.2.1 Regional Policy Statement for Taranaki (2010) (**RPS**) and the interim review report (2017);
- 6.2.2 Regional Coastal Plan for Taranaki (1997) and the Proposed Coastal Plan for Taranaki (2018), including the regional landscape study of the Taranaki coastal environment (2015);
- 6.2.3 New Plymouth District Plan (2005)¹⁰ (**District Plan**);
- 6.2.4 Oākura Structure Plan (adopted by the New Plymouth District Council 15 August 2006), including associated text and map, plus the Implementation Plan (February 2008);
- 6.2.5 Request for Private Plan Change and Application to Vary Consent Notice 9696907.4 by Oakura Farm Park Limited, dated 15 March 2018, within report by Comber Consultancy, Version 7 dated 16 April 2018, with associated appendices, including in particular:
- (a) Appendix 5 – Landscape and Visual Impact Assessment, Revision A (September 2017), Addendum (24 February 2018) and Response to Peer Review (17 May 2019) prepared by Bluemarble Landscape Architects (**the Bluemarble assessments**);
- 6.2.6 New Plymouth District Council Rural Review, Landscape Assessment and Assessment of Coastal Strategy Actions (June 2010)

¹⁰ I am aware that the Council is currently preparing a Proposed District Plan for notification this year.

prepared by landscape architect Mary Buckland; and

6.2.7 New Plymouth District Council Rural Subdivision and Development Design Guidelines (May 2012).

6.3 I have reviewed the report and decision of the New Plymouth District Council dated 8 March 2011 granting subdivision resource consent, subject to conditions, which enabled '*The Paddocks*' residential development.

6.4 I have read the Council's section 42A recommendation report (dated 31 May 2019) on the application and the request, including the relevant specialist review input from landscape architect Emma McRae (memos dated 13 February 2019 and 30 May 2019) in Appendix 7.

6.5 I have read the expert evidence prepared on behalf of Oakura Farm Park Limited, including the evidence from landscape architect Richard Bain dated 17 June 2019.

6.6 I have not been involved in any expert conferencing with Ms McRae or Mr Bain to date, however, as directed by the hearing chairperson, this expert conferencing is scheduled to occur on 10 July 2019.

6.7 I have utilised a seven-point scale of effects ratings in my review assessment of the application and of the request – as set out in **Appendix 3**.

6.8 A number of maps and figures support my written statement of evidence and these are contained in **Appendix 4**. The maps on **Sheets A and B** in Appendix 4 are provided for context purposes and to confirm the location of various places and road names referred to in my statement of evidence.

6.9 In assisting with my assessment, I am relying on the Geographic Information System expertise of landscape architect Nikolay Popov for the preparation of the maps which are illustrated on **Figures 1-4** in Appendix 4 and the accompanying information set out on **Sheet C**.

6.10 I prepared the overlay drawing which is included in **Appendix 5** in order to illustrate the location and extent of the area proposed to be rezoned in the context of and in relation to the Council's 2006 Structure Plan.

7 IMPORTANCE OF THE CONSENT NOTICE

7.1 Amongst other restrictions imposed by the Council, Condition 4 of the consent notice¹¹ on Lot 29 DP497629 under CT 736913, being the larger balance farm property created when *'The Paddocks'* residential development was enabled, specifies no further subdivision while that land remains in the Rural Environment Area of the District Plan.

7.2 In my opinion, the importance of this consent notice condition is paramount for the protection of the landscape character of the rural land between South Road (SH45) and the Kaitake Range in the vicinity of the Wairau Stream. The opportunity to develop this land for residential purposes was, in my mind, lost when residential development was enabled on land at an elevated location (relative to South Road (SH45)) adjacent to and west of Wairau Road.

7.3 The landscape benefits of the restrictions that were placed on *'The Paddocks'* residential development (including in relation to building height, coverage,

¹¹ Refer Appendix 1.4 of the Comber Consultancy 16 April 2018 report.

materials and colour and the associated protection, enhancement and ongoing management of the Wairau Stream tributary) are clearly evident today¹², now that much of this development has been implemented. However, the landscape character of this developed elevated area of land adjacent Wairau Road has changed to become more clearly an urban residential land use, while the balance lot remains clearly rural.

7.4 I concur with the discussion in the Bluemarle 24 February 2018 assessment that the consent notice assists in preserving the views of the foreground and setting of the Kaitake Ranges Outstanding Landscape, particularly when viewed from South Road (SH45), and maintains rural spaciousness and character.

7.5 Mr Bain's assessment agrees with my own findings that development enabled by the proposed rezoning will see a permanent change from a rural (open green pastoral farmland) to an urban (predominantly residential) landscape. Mr Bain acknowledges¹³ that the purpose of the consent notice will not be achieved through the proposed plan change and the landscape benefits of that mechanism will be lost. In my mind, the developer¹⁴ would *'get to have their cake and eat it too'*.

7.6 From my involvement with the Tapuae Country Estate farm park subdivision (which is located 2-3 kilometres to the north-east of Oākura on South Road (SH45)), I appreciate how important it is that the balance farm lot remains in place as a functioning rural activity, in order

¹² Although I did observe a number of weed plants within the QEII Covenant area during my site visits.

¹³ Bluemarle Addendum, 24 February 2018, page 3, second sentence under sub-heading.

¹⁴ "Oakura Farm Park Limited" – I note that this name might have been reflective of the outcomes sought for *'The Paddocks'* subdivision, but is at odds with the outcomes that will result from this application and request. The key principle behind a *'farm park'* subdivision is to retain rural character.

for rural character to be maintained. It would be entirely inappropriate, for example, if the balance farm lot at the Tapuae Country Estate was further subdivided for additional residential lots.

7.7 In my opinion, the representative photographs contained within **Figures 5-15** in Appendix 4¹⁵, clearly illustrate that Lot 29 DP 497629, which comprises the majority of the area subject to the request, is rural in character. The interplay between this rural landscape, in the foreground of views, with the Outstanding Landscape, in the background, typifies the essence of the Oākura and Taranaki rural landscape character, in my opinion.

7.8 For the above reasons, it is therefore my opinion, that the application to vary or cancel the consent notice would result in very high (significant) adverse landscape and visual effects and the application should be refused by the consent authority.

8 PROPOSED STRUCTURE PLAN / DEVELOPMENT LAYOUT

8.1 I hold concerns over the anticipated layout of urban development that would be enabled by the proposed rezoning and the adverse landscape and visual effects which would result. My review of the following drawings¹⁶ has informed these findings:

8.1.1 Wairau Estate Oakura Structure Plan,
Revision PL18/00048 Rev: MC#1;

¹⁵ With viewpoint locations shown on **Figure 16** in Appendix 4

¹⁶ Noting however, after reading the Oakura Farm Park Limited evidence, that these drawings may now not be truly reflective of the likely development that might be enabled should the request be approved.

- 8.1.2 Wairau Estate Proposed Stormwater Retention Areas, McKinlay Surveyors drawings SW01 (sheets 1-4) dated 15/05/17; and
- 8.1.3 Staged Concept Plan - Wairau Estate, Oakura, McKinlay Surveyors drawing C-07, 24/01/18.
- 8.2 In my experience, a structure plan is usually prepared to illustrate how a large area of land, which is often in multiple ownership, can be progressively developed as separate components, over time, in order to achieve an overall vision where a seamless integration of existing and new development occurs in the landscape. In the above context, the Council's 2006 Oākura Structure Plan is an example of an effective structure planning document, in my opinion.
- 8.3 The structure plan which forms part of the proposed rezoning is, in my mind, more akin to a '*master plan*' for the development of one particular site¹⁷. In my review of the proposed development layout which would be enabled by this '*master plan*', I fail to see how future development will seamlessly integrate with the existing Oākura village and surrounding landscape.
- 8.4 With only one entry/egress point (at Wairau Road) for vehicular access and with limited pedestrian access, the development appears to seek the creation of a clearly separated, inward focussed, isolated and disconnected area of residential and business land.
- 8.5 In my opinion, the urban development enabled by the master plan will not be well integrated and will appear

¹⁷ Albeit being three separate properties, the majority being in one ownership.

as a *'tack-on'* to the existing Oākura village¹⁸ – including the proposed business land, which is in an isolated and remote location relative to the existing Oākura village with poor connectivity.

8.6 In addition, the proposed layout of development will sever the key landscape features of importance on the property, being the gully tributaries of the Wairau Stream – including the public access esplanade strip and the KNE area that also relates to the contiguous McKie QEII Covenant¹⁹.

8.7 I do not agree with Mr Bain²⁰ that the development enabled by this request will have similarities with the Matekai Park landscape in the existing Oākura village – that park has no vehicular crossings which sever the linkage of the vegetated gully landform.

8.8 I do not agree with the statements in the request documentation that the proposed layout of development represents a *"design led approach"*²¹; as I fail to see how the inherent opportunities and constraints of the site have informed the outcome being promoted.

8.9 In my opinion, putting aside the fundamental restriction on development of the land (i.e. Condition 4 of the consent notice), if residential expansion of Oākura village was to occur on this property (whether that be fully within the area identified as Future Urban Development, or to achieve a similar extent / outcome as anticipated under the Council's 2006 Oākura

¹⁸ Refer **Appendix 5** overlay drawing which illustrates the Wairau Estate Oakura Structure Plan within the Council's 2006 Oākura Structure Plan.

¹⁹ Permission may be required from QEII National Trust for proposed severance of this KNE.

²⁰ Refer paragraph 45 of statement of evidence by Richard Bain, dated 17 June 2019.

²¹ Comber Consultancy 16 April 2018 report, pages 12/112 and 70/112.

Structure Plan), a more logical approach would be to work in collaboration with future residential development on the western (seaward) side of South Road (SH45).

- 8.10 This would be consistent with the Council's 2006 Oākura Structure Plan and would enable an integrated solution (visually and physically). I also acknowledge that an option to access the site from South Road (SH45) has been suggested by Oakura Farm Park Limited, however the access from Wairau Road is still proposed to be utilised as well, as I understand it.
- 8.11 If such a scenario were to be developed (residential development on both sides of South Road (SH45)), I would anticipate that the '*city limits*' for Oākura would need to be relocated southward – placing the 50km/100km per hour road sign at a new southern '*gateway*' to Oākura (e.g. somewhere south of the Wairau Stream main channel, but north of the golf course property extent).
- 8.12 This scenario is speculative on my behalf and would of course require community involvement in order to determine the most appropriate location for this type of solution. By undertaking such a move, the speed limit on South Road (SH45) in the vicinity of the Oakura Farm Park Limited property would become 50km/hour, thus enabling direct vehicular access to the property, potentially avoiding the need for a noise attenuation bund, and the need for vehicular access to cross any gully tributaries of the Wairau Stream on the property.
- 8.13 I note, however, that the possible alternative option suggested by Oakura Farm Park Limited²², providing

²² Comber Consultancy 16 April 2018 report, page 23/112.

urban residential development only within the area defined as Future Urban Development within the District Plan is, in my opinion, fanciful and tarred by the same errors made in the design layout through the proposed master plan for the current rezoning development (with access via Wairau Road severing the tributary, esplanade strip and KNE area adjacent the contiguous QEII Covenant).

- 8.14 Having said the above, while I acknowledge that it may be possible to prepare alternative scenarios for accommodating appropriate urban residential development on the Oakura Farm Park Limited property, this move would be entirely inappropriate in my opinion because the land is simply not available for further subdivision because of the consent notice (and its underlying purpose) on the land.

9 ADVERSE LANDSCAPE AND VISUAL EFFECTS

- 9.1 Further to the concerns that I have raised above, I am of the opinion that future urban development which would be enabled by the proposed rezoning will inevitably result in very high (significant) adverse landscape and visual effects – at both a wider-scale and in terms of various requirements of enabling future urban development at a detailed localised-scale.
- 9.2 I agree with Mr Bain that the overall magnitude of landscape change will be significant²³ however, I disagree with Mr Bain that the landscape and visual effects of this change will be contextually appropriate because the area of future urban development is proximate to the existing Oākura settlement.

²³ Refer paragraph 22 of statement of evidence by Richard Bain, dated 17 June 2019.

- 9.3 I also agree with Mr Bain that significant visual effects are likely to be experienced by people viewing the landscape change from proximate private properties, including those people viewing the outlook from within *'The Paddocks'* properties²⁴.
- 9.4 However, I share the concerns expressed by Ms McRae in her technical specialist peer review memos of 13 February 2019 and 30 May 2019 and agree that Mr Bain's assessment (and subsequently his evidence) does not adequately address the key landscape issues that arise in relation to this application and request.
- 9.5 For example, Mr Bain has not addressed a recent issue which has arisen as a result of the limitation on available water supply. As I understand it, 68 of the anticipated high density residential properties, and all of the large lot residential properties, will require water tanks – which in themselves may create adverse landscape and visual effects as additional structures in the landscape.

Relevant statutory provisions

- 9.6 At a wider-scale, given the sensitivity of the landscape, being within the coastal environment, adjacent an Outstanding Landscape and on elevated land relative to the existing Oākura urban area, the relevant statutory direction (as I understand it and which has not been proposed for amendment through this request) requires development to avoid, remedy and/or mitigate adverse landscape and visual effects.
- 9.7 The relevant provisions of the RPS and the District Plan, as I understand them, seek to (paraphrasing):

²⁴ Refer Bluemarble September 2017 assessment, page 12.

- 9.7.1 Protect outstanding landscapes from inappropriate subdivision, use and development and appropriately manage natural areas, features and landscapes of value by having regard to the value, importance, significance and sensitivity or vulnerability to change of the landscape and the degree / significance of adverse effects, including cumulative and visual effects.
- 9.7.2 Provide for appropriate use and development which maintains and enhances amenity values while avoiding, remedying or mitigating adverse effects of inappropriate use and development on amenity values.
- 9.7.3 Ensure subdivision, use and development of land, including density of built form and intensity / scale of development maintains and is in keeping with the elements of rural character, being distinguished by a dominance of openness and rural practices over man-made structures not related to the primary use.

Assessment 'baseline'

- 9.8 In my review of the Bluemarble assessments, I caution that Mr Bain has relied too heavily on the objectives and policies of the District Plan's Future Urban Development (**FUD**) overlay as some form of 'development baseline'.
- 9.9 With all due respect, Mr Bain's assessment has incorrectly relied on a comparison with possible development in the FUD overlay for this property, because that development potential has effectively been 'transferred' to *'The Paddocks'* urban residential area.

The existing environment

- 9.10 Mr Bain's assessment also relies heavily on the description of the existing environment set out within the 8 March 2011 decision granting subdivision resource consent, subject to conditions, which enabled '*The Paddocks*' residential development.
- 9.11 While this description is useful, I find it, and the image on the cover page of Mr Bain's assessment, to be somewhat misleading, given that the description and image were captured prior to any construction taking place within '*The Paddocks*' subdivision. In my opinion, the existing environment now includes this development and the associated consent notice protection of Lot 29.
- 9.12 I suggest that a more appropriate image of the site's existing character is that which is on the cover page of the Council's section 42A recommendation report – this image captures the essence of the site's character.
- 9.13 On that note, I disagree with Mr Comber's assertion that this image is "unremarkable"²⁵. In my opinion, this image is one that precisely captures the essence of the site's landscape character, being a rural environment on elevated land at the edge of an Outstanding Landscape, with a predominance of open space and little evidence of built development that is not related to rural activities.

Proximity to the Outstanding Landscape

- 9.14 In my opinion, in addition to the beach environment, one of the defining landscape elements of Oākura, which provides a sense of place, is the visual connection

²⁵ Refer paragraph 125 of statement of evidence by Colin Comber, dated 17 June 2019.

people have with the very proximate Kaitake Ranges and the wider national park.

- 9.15 Whether people are travelling through the area, or playing golf, or viewing from their homes or the school playing fields – there is an awareness and connection with this Outstanding Landscape.
- 9.16 Part of the visual connection, in my opinion, is that the foothills foreground within views towards the dramatic and elevated bush clad ranges, comprise a rural character which provides for an open space that contrasts with and complements the view quality.
- 9.17 On the other hand, should this foreground change from rural to urban, the view would be forever compromised.
- 9.18 There may well be an appropriate solution which provides for some form of urban development to occur on the site, however it is my opinion that the extent of urban development which would be enabled by this request is inappropriate and would result in a predominance of urban residential activity being located on elevated land within close proximity to the sensitive Outstanding Landscape; compromising the quality of the views that are currently afforded towards this landscape.

Mitigation measures

- 9.19 In my opinion, Mr Bain's assessment²⁶ relies heavily on the success of mitigation measures which the request proposes to become part of the District Plan. These measures relate to the control of: building height; colours of buildings (external cladding / roofs); and

²⁶ Bluemarle Assessment, September 2017, section 8, pages 18-21.

fencing controls²⁷; plus, the creation of: the buffer equestrian zone; planting associated with the South Road (SH45) noise attenuation bund; and additional planting within the vegetated gully landforms.

9.20 In my opinion, however, no attempt has been made to avoid adverse landscape and visual effects through either the proposed layout of the '*master plan*', or the proposed changes to the text of the District Plan.

9.21 While it is proposed to plant and enhance the existing waterways and gully landforms on the site (as well as installing engineered stormwater management devices), in my opinion a stronger landscape framework, utilising these natural features, would be more appropriate. For example, strong ecological corridors which assist with the connection between the mountain and the sea.

9.22 I am surprised that the Council's parks and open space team have concluded that there will be sufficient provision for taking of esplanade reserves through future subdivision.

9.23 Rather, in my mind, the proposal simply seeks to maximise development potential on the property. In my opinion, the proposed mitigation measures will not address the relevant adverse landscape and visual effects issues that will arise at a macro scale.

9.24 If adopted, the proposed plan change will enable a high density²⁸ residential development that will fundamentally change this landscape from rural to urban.

²⁷ I note that the proposed plan change does not include any additional fencing controls. Indeed, the proposed changes to the District Plan in Appendix 11 of the Comber Consultancy 16 April 2018 report don't include all of the recommendations from the landscape, ecology or archaeology reports.

²⁸ Approximately 316 residential lots (with some at 300m²) and 14 'large lot' residential properties.

Effectiveness of 'buffer' area

- 9.25 I also do not share Mr Bain's optimism that the proposed "equestrian zone" will provide an effective buffer between the proposed high density residential development and the existing Rural Environment area to the south and south-west of the plan change area²⁹.
- 9.26 In my opinion, the proposed minimum lot sizes for the proposed "Rural Lifestyle" area (being promoted as predominantly 1.0ha in size) will, as a whole, have more of an urban than a rural appearance in the landscape. In my opinion, a minimum lot size of 4.0ha is required in order to allow for the continuation of any perception of rural character in the landscape. Having said this, I do not suggest that it would be appropriate in this instance that the proposed "Rural Lifestyle" area should include a provision for lots to be a minimum of 4.0ha in size as this would be inconsistent with the outcomes anticipated by the District Plan for the rural environment.
- 9.27 In my recent experience, lot sizes of 1.0-2.0ha in size within a rural environment might be acceptable as long as there was a significant net environmental benefit being realised, for example by legally protecting large areas of existing significant ecological areas. Or, for example, as was done to protect rural character when Lot 29 DP 497629 was restricted from further subdivision by the consent notice as a consequence of 'The Paddocks' subdivision.
- 9.28 I therefore disagree with the Oakura Farm Park Limited assertions³⁰ that rural character will prevail in this area. Indeed, I fear that if the request is approved, it would be

²⁹ Bluemarble Assessment, September 2017, section 8, page 20.

³⁰ Comber Consultancy 16 April 2018 report, page 38/112.

difficult for the Council to defend the rural-urban interface in this area (there is no clear landform constraints) from future subdivision of similar sized lots on adjacent properties to the south and south-west, with potential for a cumulative loss of rural character.

9.29 I therefore disagree that the “...*equestrian lifestyle area...[will] ‘bookend’ the further southward urban expansion of Oakura providing an effective planning mechanism for defining the urban limit of Oakura inland of SH 45 for many decades into the future*”³¹.

9.30 In my opinion, relying on a cadastral boundary line is not a reliable or defensible tool for defining the rural-urban boundary in this instance. For example, in my opinion the tributary of the Wairau Stream provides an existing effective natural boundary to the existing village.

Land modification to enable urban development

9.31 Major earthworks will be required to enable this high density urban residential and business development, including in relation to the construction of roading access from Wairau Road – with associated residential development in this vicinity. While Mr Bain anticipates³² that earthworks required for the creation of roads and allotments will avoid the gully systems – I do not share this optimism, particularly given the number of bridge (or culvert) crossings proposed.

9.32 For example, at the main vehicular entrance to the development site from Wairau Road, I anticipate the civil engineering requirements to enable this new road access will be complex. In my experience, the design

³¹ Comber Consultancy 16 April 2018 report, page 15/112.

³² Bluemarble Assessment, September 2017, section 6, page 14.

response will likely require the need for an extensive amount of earthworks, with bridge abutments or culverts, which will have a significant adverse effect on the amenity values experienced by people using the existing track through to the McKie QEII Covenant area³³ which has been, and continues to be, promoted as an important connection route.

- 9.33 The reasons for protecting, enhancing and promoting this native ecosystem through the covenant, as envisaged in the expert ecological assessment which formed part of *'The Paddocks'* application in 2010, will be undone, in my opinion.

Stormwater management bunds

- 9.34 In my opinion, from a landscape, natural character and visual effects perspective, the proposal to create engineered stormwater management bunds within and adjacent the stream corridors on site, is inappropriate. In my experience, it is difficult to design and implement these types of interventions and achieve an outcome which continues to be perceived as a natural landscape.

The underpass beneath South Road (SH45)

- 9.35 The proposal to create an underpass beneath South Road (SH45) to connect this existing track with the northern side of the state highway is another example of poor design thinking, which will likely create more problems than it seeks to solve in my opinion (for example, Crime Prevention Through Environmental Design related issues). I note from Mr Skerrett's

³³ I note that the plan change "site boundary" excludes all of the McKie QEII Covenant area and the adjacent esplanade strip near South Road (SH45). As such, most of the Proposed Open Space C area was created and protected/enhanced by *"The Paddocks"* subdivision. i.e. the Wairau Estate Oakura Structure Plan is potentially misleading and the environmental benefits should not be double-counted.

evidence³⁴ that there is likely to be quite an extent of built intervention within the stream environs in order to construct the underpass and the access tracks, including retaining walls. It also appears that the proposed design specification will not meet the minimum recommended height clearance of 3.4m.

- 9.36 In my opinion, this type of proposed underpass design might be appropriate, for example, if it were to be utilised for an activity such as for moving stock from one side of a busy road to another (such as to and from a milking shed), rather than for a public access route.

The bund to South Road (SH45)

- 9.37 In my opinion, the bund landform will create a visual and physical separation between the existing village, and the proposed urban residential / business development behind the bund. The new track (bridle path) which is to be located adjacent the proposed noise attenuation bund along South Road (SH45) is a further example of an inappropriate design response. While this is likely to be a well utilised track, it will result in a poor public amenity value outcome.

The roundabout

- 9.38 I also hold some concern over the public amenity value that will result from the proposed roundabout at the intersection of Wairau Road and South Road (SH45). Notwithstanding that an underpass option might exist, in my experience, the design of roundabouts cater more for traffic efficiency rather than providing enhanced connectivity, amenity value for pedestrians and cyclists negotiating intersections controlled by roundabouts.

³⁴ Refer paragraph 37 of statement of evidence by Andrew Skerrett, dated 17 June 2019.

10 CONCLUSION

10.1 To ensure the protection of the landscape and the avoidance of adverse landscape and visual effects, for the reasons outlined above, it is my opinion, that:

10.1.1 The application by Oakura Farm Park Limited to vary or cancel Condition 4 of Consent Notice Instrument No.9696907.4 on Lot 29 DP 497629 should be refused; and

10.1.2 The request by Oakura Farm Park Limited to rezone land at Wairau Road, Oākura, under Proposed Private Plan Change 48 to the New Plymouth District Plan, should be declined.

Peter Kensington
25 June 2019



Appendix 1: Peter Kensington – relevant experience

Employment history

I have worked for the Christchurch City Council (1995-1997), the Wellington City Council (1999), the Auckland office of Boffa Miskell Limited (1999-2012) and, prior to establishing KPLC Limited in 2017, the Auckland Council (2012-2017). At the Auckland Council, I was a Principal Planner in the Hearings and Resolutions team of the Resource Consents Department. In that role, I was responsible for the case management of appeals, direct referrals, judicial reviews, objections, hearings and independent duty and hearings commissioner processes. I also assisted with the interpretation and integration of the Auckland Unitary Plan (Operative in part) into the department's practices and procedures.

Recent relevant project work (within the last two-years)

Landscape and visual effects review advice to the Auckland Council, in relation the following applications for resource consent within rural, urban fringe or coastal locations:

- New visitor accommodation units, Vintage Lane, Waiheke Island (Wharetana Bay);
- Construction of a new dwelling at Nick Johnstone Drive, Matiatia, Waiheke Island;
- Authorising restaurant buildings/activities at Cable Bay Vineyards, Waiheke Island;
- Residential 48-lot subdivision, Waitakere foothills, Christian Road, Swanson; and
- Four stage, 31-lot rural residential subdivision with associated revegetation, Wainui.

Planning and landscape advice to the Auckland Council in relation to the resolution of an appeal against the council's decision to refuse resource consent for a four-lot subdivision within the Rural - Countryside Living zone, Dairy Flat Highway, Lucas Heights.

Preparation of an application and obtaining resource consents for the construction of: a minor dwelling in the Rural – Countryside Living zone, Old North Road, Riverhead; and a farm shed and associated dwelling in the Rural Coastal zone, Goudie Road, Te Pua.

Other relevant project work (prior to 2017)

Expert landscape evidence for the Auckland Unitary Plan Independent Hearings Panel in relation to the zoning of Pararekau and Kopuahingahinga Islands in Hingaia.

Expert landscape evidence for the Environment Court in relation to the future zoning of land (Rodney Plan Change 131) adjacent the Auckland Memorial Park cemetery in Silverdale.

Expert evidence for the Environment Court in relation to a development proposal at 55 Fairview Avenue, Albany involving an intensive residential and mixed-use development.

Landscape peer review services to the Rodney District Council - Riverhead South, Precinct 2 relating to subdivision in an area identified for residential expansion of Riverhead Village.

Preparation of an assessment of landscape and visual effects for the Ellerslie Racecourse Private Plan Change 168 for the redevelopment of land surplus to racing requirements.

Local Taranaki relevant project work (prior to 2012)

Preparation of an assessment of landscape and visual effects and expert evidence to assist with the resource consenting of the Tapuae Country Estate (farm park).

Undertaking landscape feasibility studies for locating potential industrial activities in the rural coastal environment at Motunui.

Appendix 2: Relevant statutory provisions

Regional Policy Statement for Taranaki (2010)

Section 10 – Natural features and landscapes, historic heritage and amenity value.

NFL Objective 1

To protect the outstanding natural features and landscapes of the Taranaki region from inappropriate subdivision, use and development, and to appropriately manage other natural areas, features and landscapes of value to the region.

NFL Policy 1

Nationally and regionally outstanding natural features and landscapes

Outstanding natural features and landscapes are to be protected from inappropriate subdivision, use and development, including protection of:

- (a) the special scenic, recreational, scientific and Māori cultural and spiritual values associated with Mount Taranaki;*
- (b) the volcanic landforms and features of regional significance on the Taranaki ring plain;*
- (c) the special scenic, recreational and scientific values associated with the coastal environment and coastal features of regional significance;*
- (d) the natural character and natural features and landscapes of regional significance associated with Taranaki's rivers and lakes and their margins;*
- (e) the rural features and landscapes of regional significance, including the scenic and landscape qualities of the raised marine terraces of south Taranaki and inland Taranaki hill country; and*
- (f) landscape features associated with areas of indigenous vegetation that are of regional significance.*

NFL Policy 2

Other natural areas, features or landscapes of value

Recognition shall be given to the appropriate management of other natural areas, features or landscapes not covered by Policy 1 above, but still of value to the region for one or more of the following reasons:

- (a) the maintenance of water quality and quantity;*
- (b) soil conservation;*
- (c) the avoidance or mitigation of natural hazards;*

- (d) *natural character amenity and heritage values and scientific and educational significance;*
- (e) *geological and geomorphological, botanical, wildlife and fishery values;*
- (f) *biodiversity and the functioning of ecosystems;*
- (g) *'sinks' or 'pools' for greenhouse gases; and*
- (h) *cultural features of significance to tangata whenua.*

NFL Policy 3

Appropriate subdivision, use and development

The protection of outstanding and where appropriate, other natural features and landscapes of value shall be achieved by having regard to the following criteria in determining appropriate subdivision, use and development:

- (a) *the value, importance or significance of the natural feature or landscape at the local, regional or national level;*
- (b) *the degree and significance of actual or potential adverse effects on outstanding natural features and landscapes or other important natural features and landscapes, including cumulative effects, and the efficacy of measures to avoid, remedy or mitigate such effects;*
- (c) *the benefits to be derived from the use and development at the local, regional and national level;*
- (d) *the extent to which the subdivision, use or development recognises or provides for the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga;*
- (e) *the need for use or development to occur in the particular location;*
- (f) *the sensitivity or vulnerability of a natural feature or landscape to change, and its capacity to accommodate change, without compromising the values of the feature or landscape;*
- (g) *the degree of existing modification of the natural feature or landscape from its natural character;*
- (h) *the degree to which financial contributions associated with any subdivision, use and development can be used to offset actual or potential adverse effects arising from those activities.*

AMY Objective 1

To recognise the positive contributions of appropriate use and development in terms of providing for the maintenance and enhancement of amenity values in the

Taranaki region, while avoiding, remedying or mitigating the adverse effects of inappropriate use and development on amenity values.

AMY Policy 1

Amenity values

The adverse effects of resource use and development on rural and urban amenity values will be avoided, remedied or mitigated and any positive effects on amenity values promoted. Any positive effects of appropriate use and development will be fully considered and balanced against adverse effects.

Those qualities and characteristics that contribute to amenity values in the Taranaki region include:

- (a) safe and pleasant living environment free of nuisance arising from excessive noise, odours and contaminants, and from traffic and other risks to public health and safety;*
- (b) scenic, aesthetic, recreational and educational opportunities provided by parks, reserves, farmland, and other open spaces, rivers, lakes, wetlands and their margins, coastal areas and areas of vegetation;*
- (c) a visually pleasing and stimulating environment;*
- (d) efficient, convenient and attractive urban forms; and*
- (e) aesthetically pleasing building design, including appropriate landscaping and signs.*

New Plymouth District Plan (2005)

Amenity, Health and Safety

Issue 1: The adverse effects of activities on the character of areas and on other activities

Objective 1

To ensure activities do not adversely affect the environmental and amenity values of areas within the district or adversely affect existing activities.

Policy 1.1

Activities should be located in areas where their effects are compatible with the character of the area.

Issue 1A: The adverse effects of activities on the future rezoning and development of areas identified as FUTURE URBAN GROWTH AREAS

Objective 1A

To ensure that activities within and adjacent to the Future Urban Development OVERLAY do not adversely affect the ability to rezone and subsequently develop areas identified as FUTURE URBAN GROWTH AREAS.

Policy 1A.2

Subdivision of land within the Future Urban Development OVERLAY should be located and undertaken in a manner that does not have any actual or potential adverse effects on the future rezoning and subsequent development of land identified as a FUTURE URBAN GROWTH AREA.

Issue 4: Loss or reduction of rural amenity and character

Objective 4

To ensure the subdivision, use and development of land maintains the elements of RURAL CHARACTER.

Policy 4.5

Ensure that the design of subdivision and development is sensitive to the surrounding environment. In particular the following design principles will be considered:

- (a) Ensure appropriate overall density by maintaining the level of built form expected in the rural environment.*
- (b) Ensure the intensity and scale of the development is in keeping with RURAL CHARACTER.*
- (c) Ensure that ALLOTMENTS and BUILDINGS are in context with the surrounding environment and are positioned to recognise natural features in the landform.*
- (d) Ensure that ALLOTMENTS and BUILDINGS are sited and designed in a manner that is integrated with the surrounding environment with minimal disturbance to the landform by considering:*
 - (i) softening with vegetation related to the area and treatment of boundary elements;*
 - (ii) BUILDING design of a form and scale that is in keeping with the landscape;*
 - (iii) the use of materials, that are in keeping with the environment, including consideration of colour and low reflectivity;*
 - (iv) low level INFRASTRUCTURE and services that is rural in nature.*

- (e) *Consistency of any full discretionary activity with design guidelines.*
- (f) *Consideration towards any recommendations from a design panel.*

Policy 4.6

Retain vegetation, particularly indigenous vegetation and require the planting of new vegetation to mitigate the effects of activities.

Issue 14: Adverse effects of subdivision, use and development on the natural character of the coastal environment, wetlands, lakes and RIVERS and their margins

Objective 14

To preserve and enhance the natural character of the coastal environment, wetlands, and lakes and RIVERS and their margins.

Policy 14.1

The natural character of the coastal environment should not be adversely affected by inappropriate subdivision, use or development and should, where practicable, be restored and rehabilitated.

Policy 14.2

The natural character of wetlands and RIVERS and lakes and their margins should not be adversely affected by inappropriate subdivision, use or development and should, where practicable, be restored and rehabilitated.

Issue 15: The potential adverse effects of inappropriate subdivision, use and development on OUTSTANDING LANDSCAPES and REGIONALLY SIGNIFICANT LANDSCAPES

Objective 15

To protect and enhance OUTSTANDING LANDSCAPES and REGIONALLY SIGNIFICANT LANDSCAPES within the district.

Policy 15.1

Subdivision, use and development should not result in adverse visual effects on, and should enhance, where practicable, the following OUTSTANDING LANDSCAPES: • Mount Taranaki/Egmont. • The Kaitake and Pouakai mountain ranges.

Issue 23: The need to comprehensively plan for future urban development

Objective 23

That land identified for future urban use is comprehensively planned to facilitate an integrated approach to land development while addressing site specific issues to provide for accessible, connected, efficient, liveable communities and coherent urban spaces.

Policy 23.1

To control the design and layout of future urban areas through structure plans to allow for the comprehensive development of the area by ensuring:

- a) The type, location and density of the development is suitable for the site;*
- b) Infrastructure is provided in a co-ordinated manner by considering location, type and staging;*
- c) The development considers topography and minimises changes to landform;*
- d) That the constraints are identified and managed to ensure resilient and safe communities.*
- e) Interfaces with surrounding land-uses are assessed and adverse effects are mitigated;*
- f) Open space, parks and esplanade reserves or strips are provided for;*
- g) Connectivity and accessible urban form is provided for; and*
- h) That special features are recognised and that those features of particular significance are protected.*

Definitions

OUTSTANDING LANDSCAPE - means those landscapes within the district having exceptional value or eminence or distinction on a national scale; and are identified as an OUTSTANDING LANDSCAPE on the planning maps.

RURAL CHARACTER - is the combination of elements that make an area 'rural' rather than 'urban'. Rural areas are typically distinguished by a dominance of openness and rural practices over man made structures not related to the primary use. RURAL CHARACTER includes the key elements of Spaciousness, Low density, Vegetated, Production Orientated, Working Environment, Rural Based Industry and Rural INFRASTRUCTURE. The elements of RURAL CHARACTER are further defined under these categories in the reasons to Issue 4.

RURAL ENVIRONMENT AREA - means that area of the district that is predominantly rural in character, where the elements of rural character include but are not limited to; spacious areas of pasture, low density and widely spaced built form, infrequent intensively developed industrial SITES, areas of vegetation or rural noise and smell. This area has a distinct level of amenity. It is identified on the planning maps as a RURAL ENVIRONMENT AREA. Note: A full explanation of these areas is given at the beginning of the RURAL ENVIRONMENT AREA chapter.

Explanation:

The RURAL ENVIRONMENT AREA within the New Plymouth District includes all the land outside of the 'urban ENVIRONMENT AREAS'. It incorporates parts of the Taranaki Ring Plain, eastern hill country, and coastal terraces near the northern entrance to the district. The elements associated with the rural environment include spaciousness, low density built form, vegetation (such as pasture, crops and forest), and distinctly 'rural' noises and smells. These elements are largely developed as a result of traditional 'rural' practices such as pastoral farming, horticulture, intensive farming activities and other rural industries, including the established activities of the PETROLEUM EXPLORATION and production industry.

REASONS

It is important that subdivision and development is designed so that it can fit into the rural landscape and maintain RURAL CHARACTER. The overall density of the subdivision or development will impact the level of built form. It is important that subdivision and development is designed in a way that maintains a level of built form that is anticipated in the rural environment. If the densities are too high the spaciousness and low density elements of RURAL CHARACTER may not be able to be maintained. The subdivision or development should be of an intensity and scale that is appropriate for the rural environment. It may be appropriate to design a smaller scale development (with few ALLOTMENTS, or a smaller scale activity or BUILDING) so that the intensity of use is more in keeping with RURAL CHARACTER. The subdivision and development should relate well to the surrounding environment. It is important that there is a relationship with the surrounding environment and that the subdivision or development recognises the natural contours of the landscape. The overall design of the ALLOTMENTS or BUILDINGS need to be integrated to the surrounding context, by considering the role of vegetation to soften the effects of development, the treatment of boundary elements, ensuring BUILDING design is of an appropriate form and scale and how materials can mitigate adverse effects. Consideration towards the role of colour should also be made. Colours that have low reflectivity more effectively contribute to maintaining RURAL CHARACTER. INFRASTRUCTURE that is required to service the development should be low level and rural in scale to maintain RURAL CHARACTER. The provision of information and design guidelines will assist in promoting the visual character of the rural area and encourage landowners to consider alternative design and/or location for development. Design panel processes will also provide the opportunity for comprehensive consideration of RURAL CHARACTER issues. Conditions on consent will also be able to consider relevant design issues.

Appendix 3: Scale of effects ratings

Seven-point scale of effects ratings based on NZILA³⁵ and Auckland Council³⁶ guides under the context of the Resource Management Act 1991 terminology³⁷.

Rating	Use / Definition	RMA
Extreme:	Total loss of the existing character, distinctive features or quality of the landscape resulting in a complete change to the landscape or outlook.	Significant
Very High:	Major change to the existing character, distinctive features or quality of the landscape or a significant reduction in the perceived amenity of the outlook.	Significant
High:	Noticeable change to the existing character or distinctive features of the landscape or reduction in the perceived amenity or the addition of new but uncharacteristic features and elements.	More than minor - likely unacceptable
Moderate:	Partial change to the existing character or distinctive features of the landscape and a small reduction in the perceived amenity.	More than minor - potentially acceptable
Low:	A slight loss to the existing character, features or landscape quality.	Minor
Very Low:	The proposed development is barely discernible with little change to the existing character, features or landscape quality.	Less than minor
Negligible:	The proposed development is barely discernible or there are no changes to the existing character, features or landscape quality.	Less than minor

³⁵ Best Practice Note 10.1 'Landscape Assessment and Sustainable Management' November 2010

³⁶ 'Information requirements for the assessment of landscape and visual effects' September 2017

³⁷ Where this is relevant in relation to notification considerations or non-complying activities

Appendix 4: Supporting graphic annexures

(A3-sized landscape format)

Land Information New Zealand – Topo 50 Map Series Extracts

Sheet A – Location of Oākura relative to New Plymouth and Kaitake Range

Sheet B – Enlargement of Sheet A illustrating local Oākura features / context

LAS Geographic Information System Maps

Figure 1 – Site location within wider landscape context

Figure 2 – Site location within local landscape context

Figure 3 – Site location within local landscape context (Land Cover)

Figure 4 – Site location within immediate landscape context

Sheet C – LAS data source information

KPLC Figures

Figure 5 – VP 1: Panorama from Ahu Ahu Road (looking east)

Figure 6 – VP 1: View from Ahu Ahu Road (looking east)

Figure 7 – VP 2: Panorama from South Road (SH45) (looking south)

Figure 8 – VP 2: View from South Road (SH45) (looking south)

Figure 9 – VP 3: View from esplanade strip walkway (looking south-east)

Figure 10 – VP 4: Panorama from west side of substation (looking south)

Figure 11 – VP 4: View from west side of substation (looking south)

Figure 12 – VP 5: Panorama from *'The Paddocks'* (looking west)

Figure 13 – VP 5: View from *The Paddocks'* (looking west)

Figure 14 – VP 6: Panorama from esplanade strip (looking east)

Figure 15 – VP 6: View from esplanade strip (looking east)

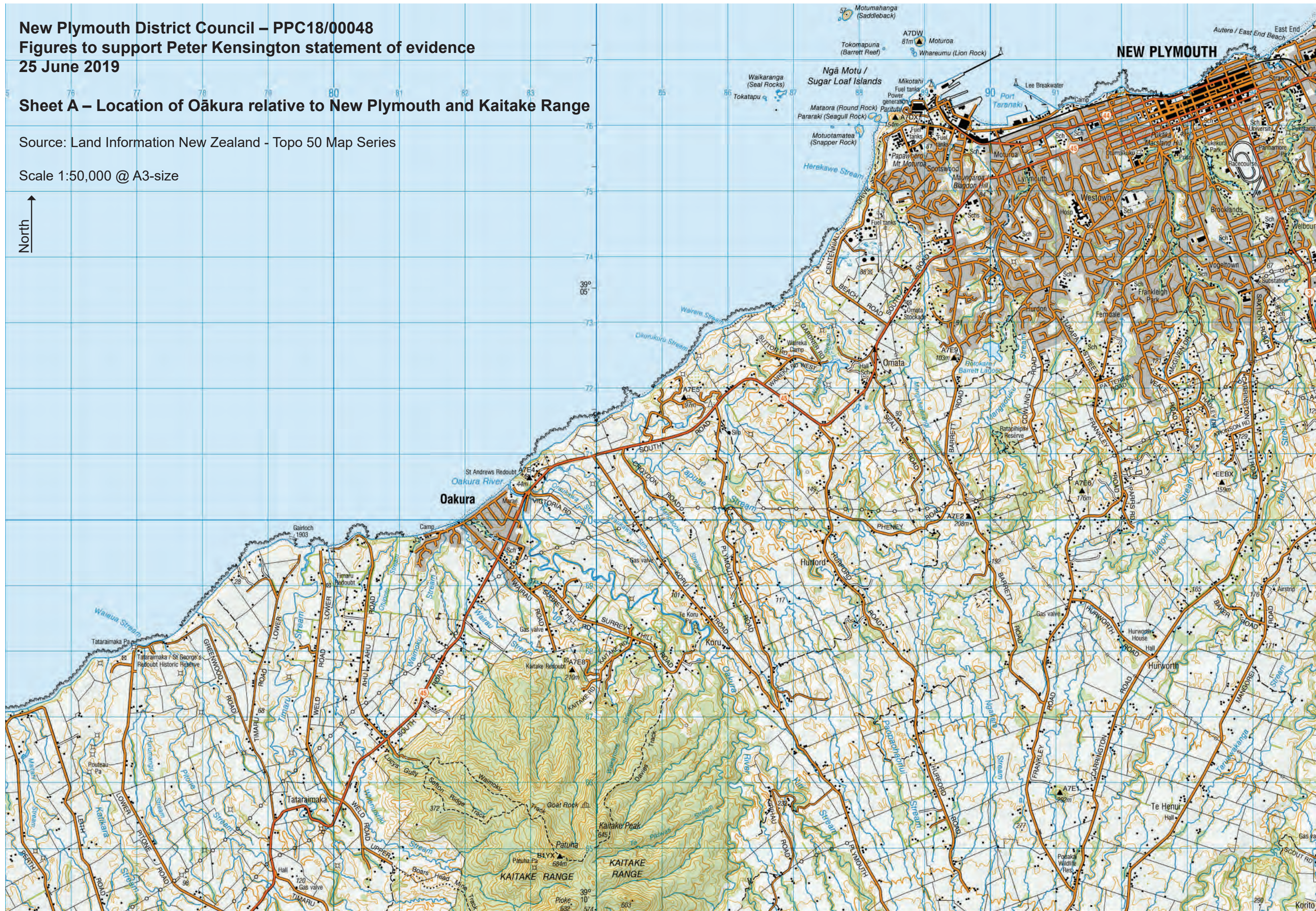
Figure 16 – Viewpoint Location Plan

New Plymouth District Council – PPC18/00048
Figures to support Peter Kensington statement of evidence
25 June 2019

Sheet A – Location of Oākura relative to New Plymouth and Kaitake Range

Source: Land Information New Zealand - Topo 50 Map Series

Scale 1:50,000 @ A3-size



New Plymouth District Council – PPC18/00048
Figures to support Peter Kensington statement of evidence
25 June 2019

Sheet B – Enlargement of Sheet A illustrating local Oākura features / context

Source: Land Information New Zealand - Topo 50 Map Series

Scale 1:25,000 @ A3-size

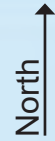
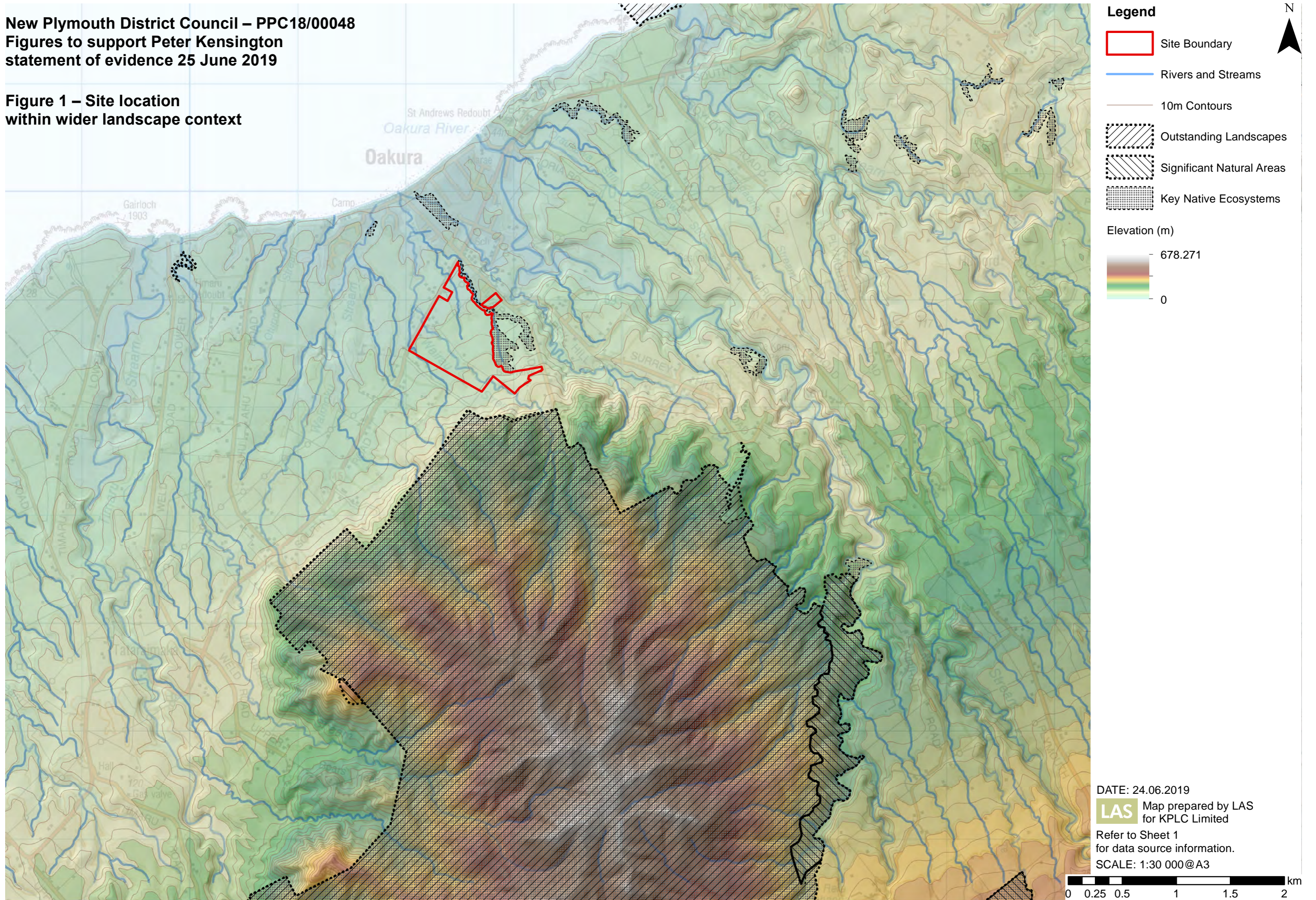


Figure 1 – Site location
within wider landscape context



- Legend**
- Site Boundary
 - Rivers and Streams
 - 10m Contours
 - Outstanding Landscapes
 - Significant Natural Areas
 - Key Native Ecosystems

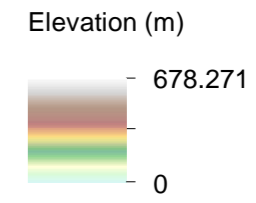


Figure 2 – Site location
within local landscape context

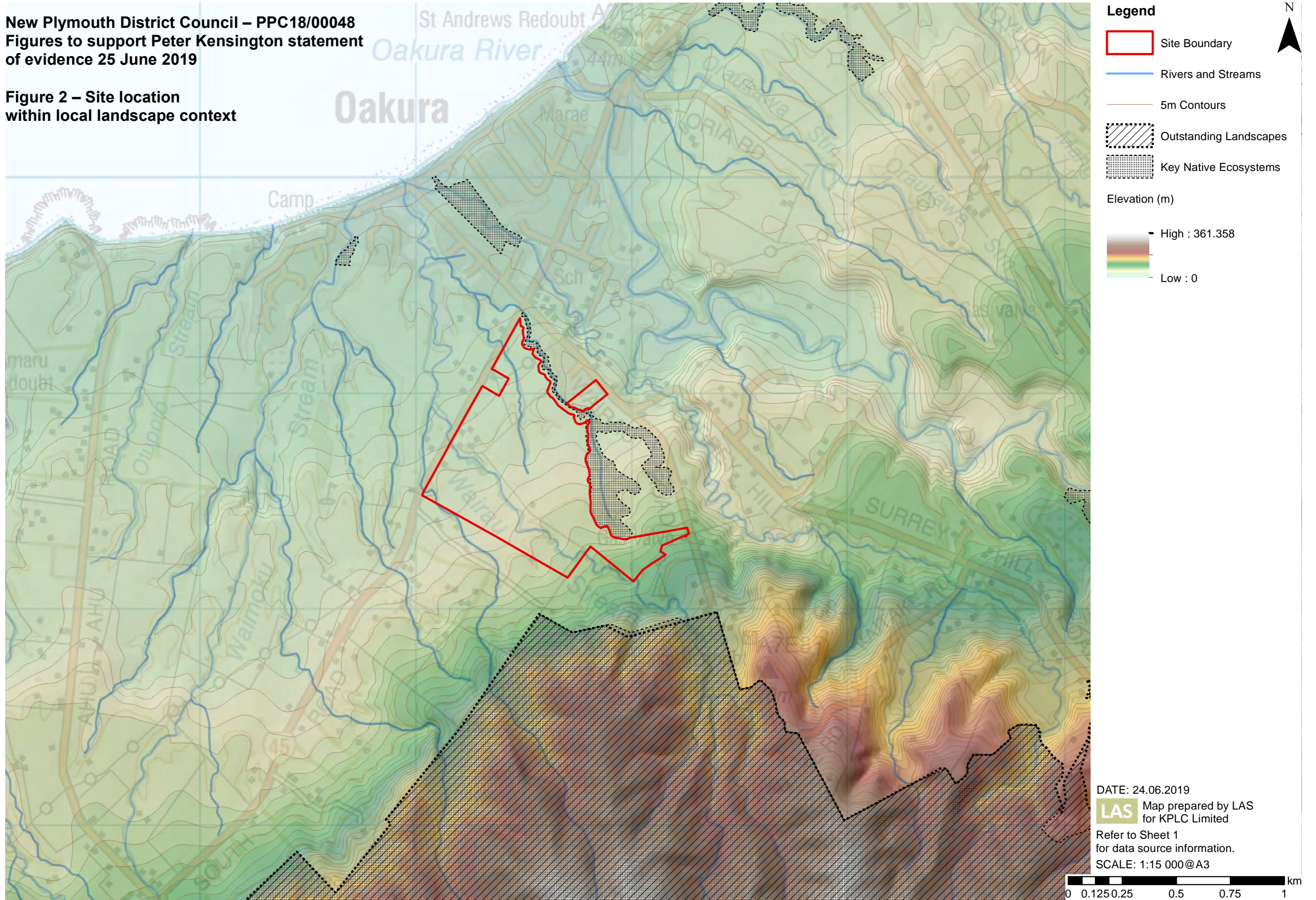
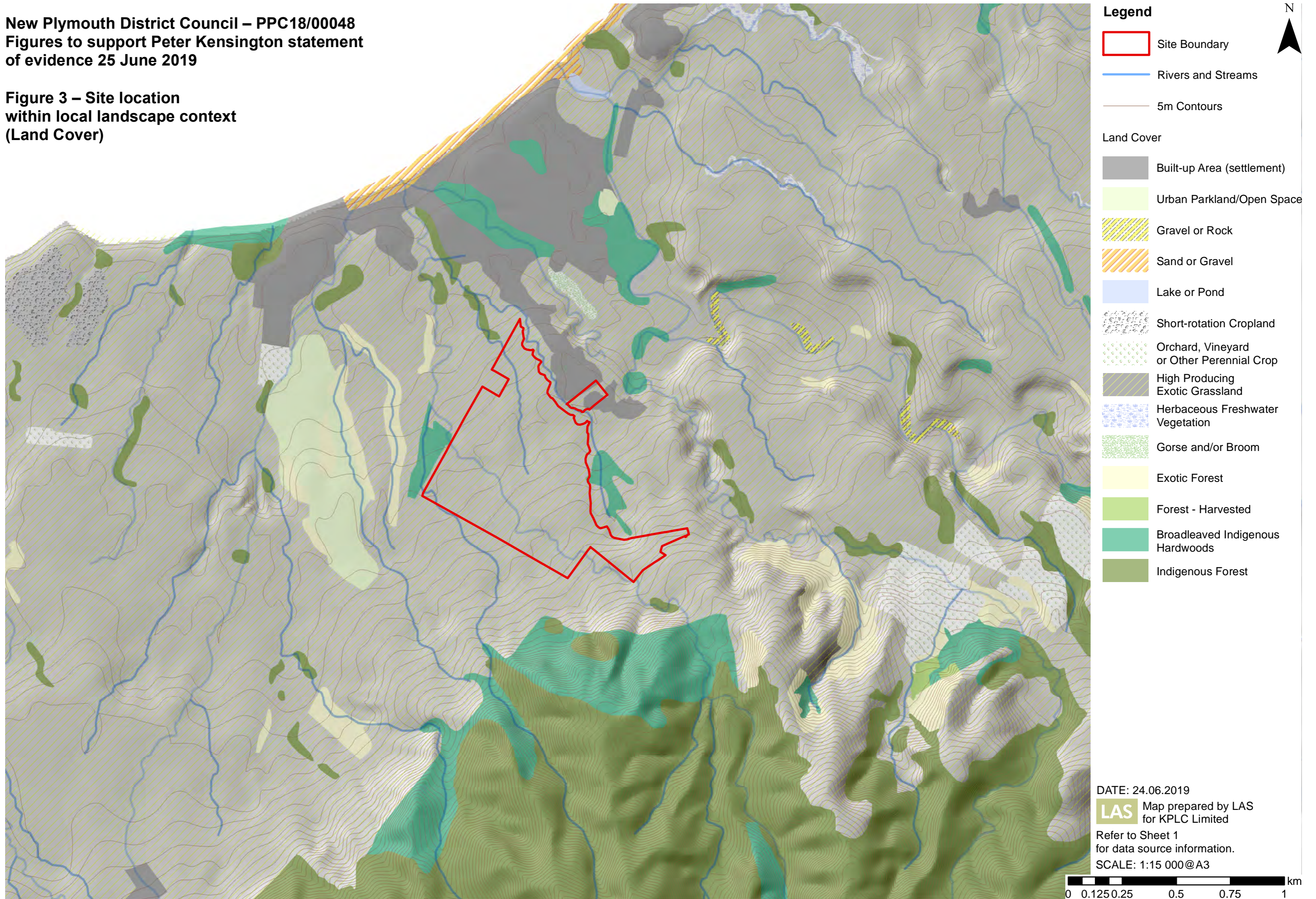


Figure 3 – Site location
 within local landscape context
 (Land Cover)



Legend

- Site Boundary
 - Rivers and Streams
 - 5m Contours
- Land Cover
- Built-up Area (settlement)
 - Urban Parkland/Open Space
 - Gravel or Rock
 - Sand or Gravel
 - Lake or Pond
 - Short-rotation Cropland
 - Orchard, Vineyard or Other Perennial Crop
 - High Producing Exotic Grassland
 - Herbaceous Freshwater Vegetation
 - Gorse and/or Broom
 - Exotic Forest
 - Forest - Harvested
 - Broadleaved Indigenous Hardwoods
 - Indigenous Forest

DATE: 24.06.2019

LAS Map prepared by LAS
 for KPLC Limited

Refer to Sheet 1
 for data source information.

SCALE: 1:15 000@A3

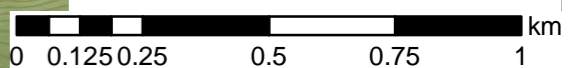
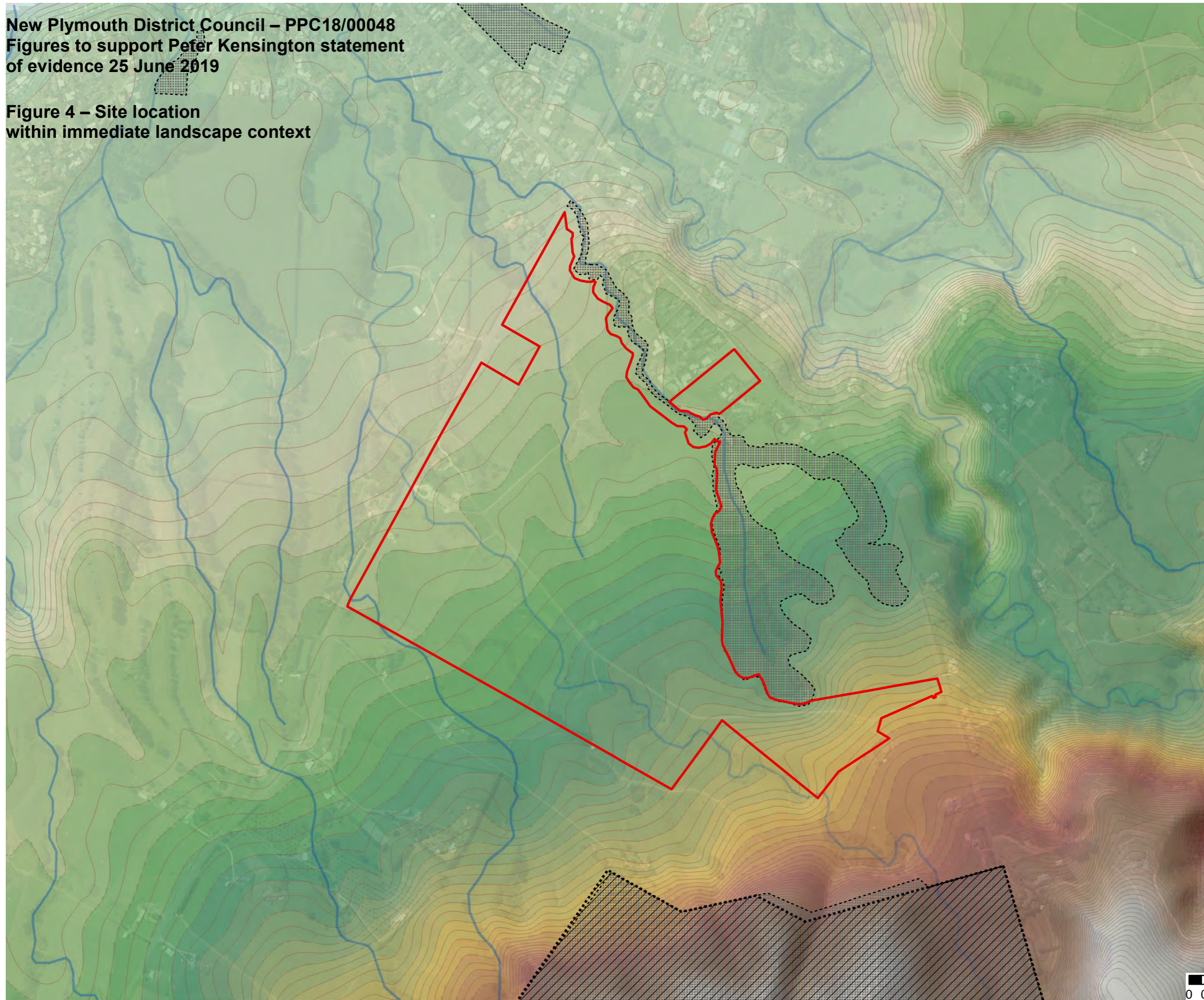



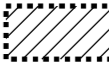
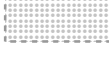


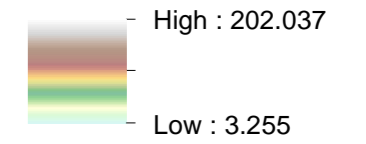
Figure 4 – Site location
within immediate landscape context



Legend

-  Site Boundary
-  Rivers and Streams
-  2m Contours
-  Outstanding Landscapes
-  Key Native Ecosystems

Elevation (m)

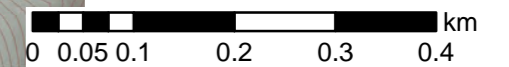


DATE: 24.06.2019

LAS Map prepared by LAS
for KPLC Limited

Refer to Sheet 1
for data source information.

SCALE: 1:7 500@A3



New Plymouth District Council – PPC18/00048
Figures to support Peter Kensington statement of evidence
25 June 2019

Sheet C – LAS data source information

Layer Name	Data Sources	Available From
NZ 8m Digital Elevation Model (2012)	Geographx (http://geographx.co.nz)	https://data.linz.govt.nz/layer/51768-nz-8m-digital-elevation-model-2012/
Taranaki 0.4m Rural Aerial Photos (2011-2012)	Taranaki Regional Council	https://data.linz.govt.nz/layer/51869-taranaki-04m-rural-aerial-photos-2011-2012/
NZ Topo50 Maps	Land Information New Zealand	https://data.linz.govt.nz/layer/50767-nz-topo50-maps/
LCDB v4.1 - Land Cover Database version 4.1	Landcare Research	https://iris.scinfo.org.nz/layer/423-lcdb-v41-land-cover-database-version-41-mainland-new-zealand/
Rivers and Streams	Taranaki Regional Council	http://data-trcnz.opendata.arcgis.com/search?tags=Rivers%20and%20Catchments
Key Native Ecosystems	Taranaki Regional Council	http://data-trcnz.opendata.arcgis.com/datasets/key-native-ecosystem
Significant Natural Area Polygon	New Plymouth District Council	http://data-npdc.opendata.arcgis.com/datasets/655295d53a0745b5b1831c1b4a54b663_66
Outstanding Landscapes (Natural Value Polygon)	New Plymouth District Council	http://data-npdc.opendata.arcgis.com/datasets/b6523aeb172d403984178fb176dca79d_69
Contours (2, 5, and 10m) – interpolated from DEM	LAS	
Hillshade – computed from DEM	LAS	

Extent of single frame image - refer Figure 6



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Extent of single frame image - refer Figure 8

Joins left hand side of image below













Extent of single frame image - refer Figure 13



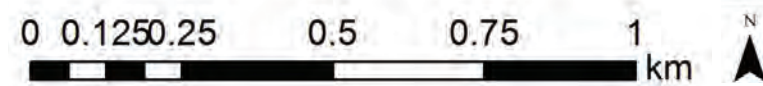
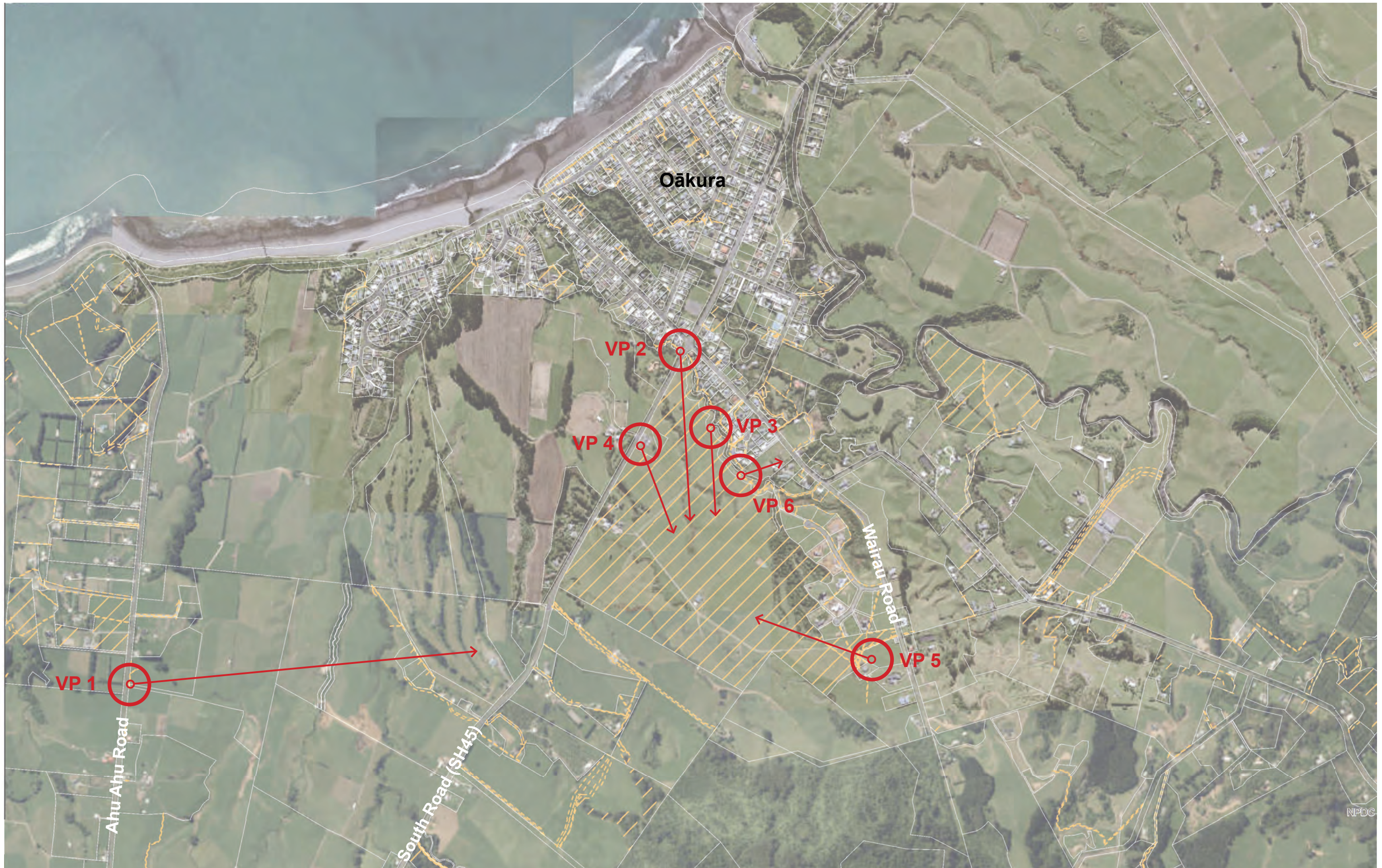
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Extent of single frame image - refer Figure 15







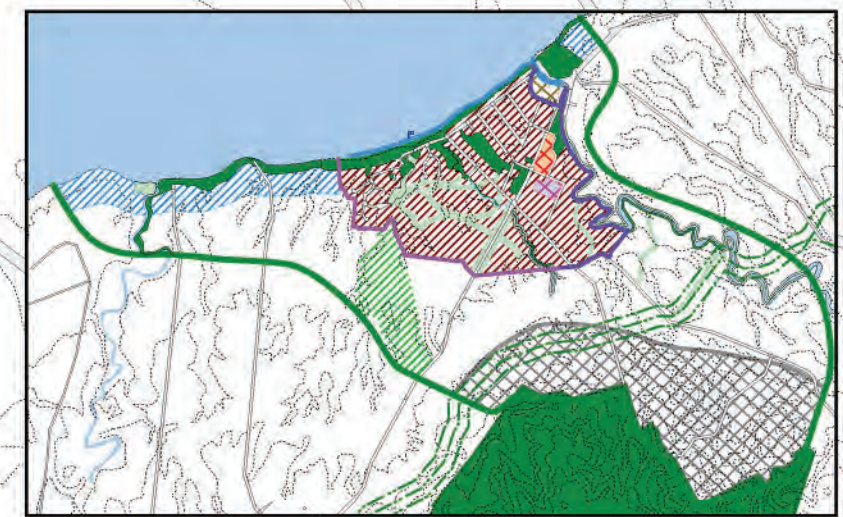
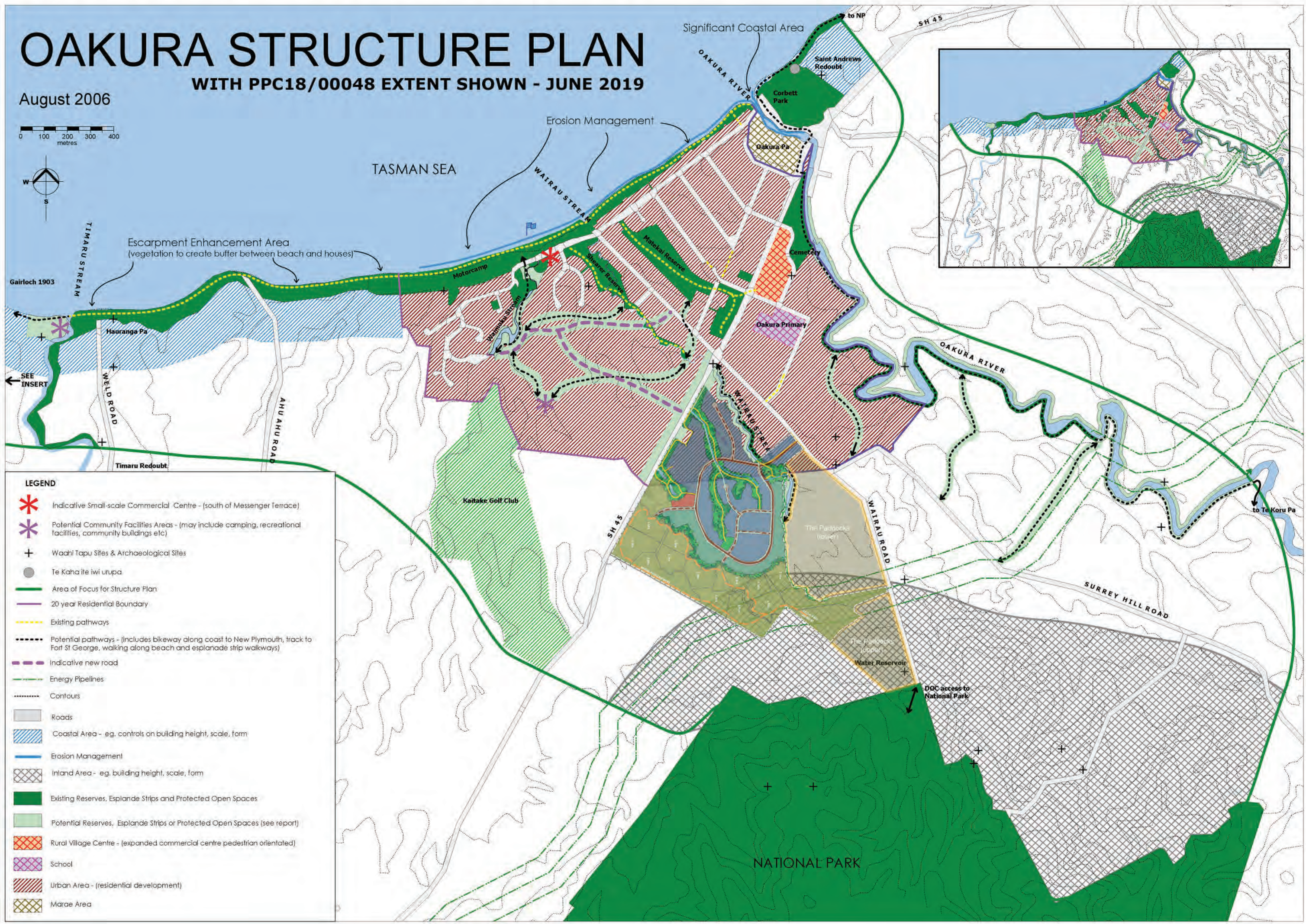
Appendix 5: Oākura Structure Plan (August 2006)
Overlay with PPC/18/00048 extent shown – June 2019

(A3-sized landscape format)

OAKURA STRUCTURE PLAN

WITH PPC18/00048 EXTENT SHOWN - JUNE 2019

August 2006



LEGEND

- Indicative Small-scale Commercial Centre - (south of Messenger Terrace)
- Potential Community Facilities Areas - (may include camping, recreational facilities, community buildings etc)
- Waahi Tapu Sites & Archaeological Sites
- Te Kaha ike iwi urupa
- Area of Focus for Structure Plan
- 20 year Residential Boundary
- Existing pathways
- Potential pathways - (includes bikeway along coast to New Plymouth, track to Fort St George, walking along beach and esplanade strip walkways)
- Indicative new road
- Energy Pipelines
- Contours
- Roads
- Coastal Area - eg. controls on building height, scale, form
- Erosion Management
- Inland Area - eg. building height, scale, form
- Existing Reserves, Esplanade Strips and Protected Open Spaces
- Potential Reserves, Esplanade Strips or Protected Open Spaces (see report)
- Rural Village Centre - (expanded commercial centre pedestrian orientated)
- School
- Urban Area - (residential development)
- Marae Area