

**BEFORE AN INDEPENDENT HEARINGS COMMISSIONER
NEW PLYMOUTH DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER an application by **ALL GOOD PROPERTIES LIMITED** for resource consent to subdivide land at Tawa Street, Inglewood into 13 unit titles ("Proposal")

Council Ref: SUB21/47746 and LUC21/47723

STATEMENT OF EVIDENCE BY CARINA MAREE MCQUEEN

Dated 17 June 2022

Govett Quilliam
THE LAWYERS

Rebecca Eaton
Phone: (06) 768 3700
Fax: (06) 768 3701
Private Bag 2013/DX NP90056
NEW PLYMOUTH 4342
rebecca.eaton@gqlaw.nz

STATEMENT OF EVIDENCE BY CARINA MAREE MCQUEEN

1. INTRODUCTION

1.1 My name is Carina Maree McQueen. I am a Landscape Architect with McQueens Landscape Architects Ltd.

Qualifications and experience

1.2 I hold a Bachelor of Landscape Architecture degree from Lincoln University, Canterbury, New Zealand, graduating in 1999 with Honours.

1.3 I worked with an established Landscape Design company in Christchurch before establishing my own Landscape Architecture company in 2004, which has been based in Taranaki since 2008.

1.4 I have practiced landscape architecture in New Zealand for approximately 23 years. My work has included involvement in the design of landscaping and planting plans for various residential subdivision projects and the preparation of landscape assessment impact reports in the Canterbury, Queenstown and Taranaki regions.

1.5 I have also been involved in applications for large scale infrastructure, including the preparation of evidence in relation to a resource consent application for the establishment of an Oil and Gas Production facility in South Taranaki, and have been called on as an expert witness in the Environment Court.

1.6 My work has also involved the design and assessment of landscaping and planting plans for proposed developments in the Inglewood area. In 2019 I was engaged to prepare a Planting Plan to support the resource consent application for the Hodge Park development/subdivision in the Inglewood township.

1.7 My involvement in the Proposal has included:

1.7.1 Preparation of the Landscaping Plan for the Proposal.

1.7.2 Review of the Consent Application prepared by Bland & Jackson Surveyors Ltd (“the Application”).

1.7.3 Review of the submission made regarding the application; and

1.7.4 Review of the Section 42A Report ("Officer's Report").

1.8 I have visited the application site and the surrounding area on numerous occasions and am familiar with it and the surrounding environment, as this is also my local township.

Expert Witness Code of Conduct

1.9 I confirm that I have read, and agree to comply with, the Environment Court's Code of Conduct for Expert Witnesses (Environment Court of New Zealand Practice Note 2014). This evidence I am presenting is within my area of expertise, except where I state that I am relying on the evidence of another person. To the best of my knowledge I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

Involvement in the Proposal

1.10 In 2021 I was engaged by All Good Properties Limited to prepare a Landscaping Plan (including associated Planting Schedule) for the proposed 13 lot subdivision at 13 Tawa Street, Inglewood ("Proposal").

1.11 In June 2021, I provided a response to the Council's section 92 request for further information in relation to proposed tree planting near the unit title boundaries.

Scope of evidence

2. In my evidence I will comment on:

2.1.1 The Proposal;

2.1.2 Site and Surrounding Environment

2.1.3 Landscape assessment

2.1.4 Response to submitter;

2.1.5 Council Officer Report;

2.1.6 Conditions of consent; and

2.1.7 Conclusion

3. **THE PROPOSAL**

3.1 The Proposal is well described and outlined in the application documents, further information submitted by the applicant and the evidence of others and I do not propose to provide a further description.

4. **SITE AND SURROUNDING ENVIRONMENT**

4.1 The site and surrounding environment has been accurately described in both the Council's notification report (paragraphs 11 – 15) and in the s42A report (paragraphs 4.1 and 4.2).

4.2 In addition to the description included in the above documents, I note that there are a variety of both fencing and vegetation choices present on the surrounding residential properties particularly along the Tawa Street road boundaries. This provides a streetscape with a variation of design in both fencing and vegetation choices.

5. **LANDSCAPE ASSESSMENT**

5.1 The Landscape Plan features 1.8m high timber privacy fencing along the Tawa Street boundary (with a break for the Common Area and driveway for Unit 1), along the east, west and southern boundaries of the site, and between each proposed unit.

5.2 Both units 1 & 13 are set back 1 metre off the front Tawa Street boundary with a further step back on the corners of boundaries bordering the Common Area (ROW). These setbacks allow for additional areas of planting.

5.3 In addition to the timber fencing along the Tawa Street boundary, the Landscape Plan includes the spaced planting of plant species and Sweet Gum/ *Liquidambar styraciflua* 'Burgundy' trees.

5.4 These particular design features will help achieve the following;

5.4.1 Privacy values for both the future residents of the dwellings and for neighbouring properties

- 5.4.2 Increased amenity values by softening the consistent lines of the fencing and built development and;
- 5.4.3 Consistency with neighbouring properties and the wider Tawa Street streetscape that display both fencing and planting as a boundary feature.
- 5.5 Each unit has an impermeable surface driveway, front path to main entry door, a small area directly out from the service door and outdoor living patio space. Permeable surfaces such as gravel areas in service areas and lawn areas of garden have been chosen where possible to assist with rainfall dispersal and also to soften any hard landscaping features
- 5.6 The Landscape Plans (and associated Planting Schedules) for the Proposal provides for the use of various species of planting from lawn areas and lower shrubs to specimen trees. These particular species have been chosen to enhance the visual amenity values for the residents of the proposed dwellings and those who reside in the immediate area surrounding the site and to mitigate any potential adverse effects on residential character and amenity, as set out below.
- 5.7 The plant species that have been chosen display a rapid to moderate growth habit, suitable for the particular growing conditions of this site. Varying growth habits will assist in softening and breaking up the built development and hard surfaces. The species chosen will provide significant vegetative screening in a shorter period of time.
- 5.8 Shrub species on the planting plan are mainly evergreen in nature and New Zealand native species, with 2 types of exotic flowering species. The use of mainly evergreen species will ensure year round screening and privacy for residents of the proposed dwellings as well as those residing in the immediate area surrounding the site.
- 5.9 The tree specified in the Landscape Plan is solely that of *Liquidambar styraciflua* 'Burgundy'. This is a deciduous variety noted for its autumnal colour display, with a narrow upright growth habit. Being a deciduous variety, this species will ensure adequate sunlight levels are achieved in

winter to the proposed dwellings, while the growth habit will ensure no encroachment or nuisance to common areas in the proposed subdivision.

- 5.10 Planting density in the landscaping plan is concentrated along key boundaries, the Tawa Street road frontage boundary, common area driveway access and areas of the proposed dwellings' outdoor living spaces. This will mitigate any adverse effects by softening the visual appearance of the built development and will enhance the visual amenity values for both future residents of the proposed development and neighbouring properties.
- 5.11 While the Proposal does not strictly retain the current residential character of the site, for the reasons set out in my evidence, I do not consider that this will have an adverse impact on the residential amenity of the surrounding properties/those traversing Tawa Street.
- 5.12 I believe that any adverse effects of the Proposal on residential character and amenity would be no more than minor.

6. **RESPONSE TO SUBMITTER**

- 6.1 I understand that one submission has been received regarding the Application from Jessica and Dale de Jongh ("the Submitter").
- 6.2 I have reviewed the above submission.
- 6.3 The submission raises the following concerns regarding the Proposal:
- 6.3.1 The impact of the Proposal on residential character and amenity, in particular:
- (a) The intensity of the proposed number of dwellings;
 - (b) The impact of the Proposal on the current streetscape; and
 - (c) The proposed planting is too modern in design.
- 6.4 In response to the above concerns raised in the submission;
- 6.4.1 I believe that the proposed landscaping and planting in accordance with the Landscape Plan helps to mitigate the proposed density of built development by using higher density plantings in key visual areas, from both the surrounding properties and for future residents of the dwellings.

6.4.2 In addition, the proposed landscaping and planting will be of a consistent nature to the current streetscape using both timber screening/ privacy fencing and by using a varied mix of species (both native and exotic), of different heights, textures and seasonal interest to ensure a less monoculture or contemporary design.

6.4.3 Finally, I understand that the Submitter's property is directly across Tawa Street from the proposed vehicle access for Unit 1. Accordingly, the Submitter's aspect and view of the Proposal site is that of the road boundary frontage. As set out above, the proposed landscaping and planting along the Tawa Street frontage has been designed to mitigate the proposed density of built development and will be of a consistent nature to the current streetscape. I also understand the southerly aspect, that being the aspect looking across to Tawa Street, of the Submitter's property is currently primarily being used for vehicle access and parking.

6.5 For the reasons set out above, I therefore consider that the residential character and amenity effects of the Proposal on the Submitter's property are appropriately mitigated.

7. COUNCIL OFFICER REPORT

7.1 I have reviewed the Section 42A Report for the Application as it relates to my area of expertise.

7.2 I wish to clarify the following matters:

7.2.1 the reference at paragraph 10.13 of the Section 42A Report to 'sweet gum' and *Liquidambar styraciflua* 'Burgundy', should not be read as 2 different species; and

7.2.1 that consultation with experienced growers of the above specimen trees was carried out to confirm the appropriate planting distance of these tree specimens in relation to reticulation systems.

8. **CONDITIONS OF CONSENT**

8.1 I confirm that the proposed conditions of consent by the Council are appropriate in addressing landscaping/residential amenity matters, with the addition of the below condition.

8.2 I further recommend that an additional condition be included, with words to the effect of: "At such time that planting is undertaken in accordance with Condition 11, should those plant species listed in the approved landscaping plan become unavailable or are unable to be sourced, the consent holder shall consult with a landscape architect to recommend and approve a suitable variety substitute."

9. **CONCLUSION**

9.1 It is my opinion, for the reasons I have provided above in my evidence, that the proposed landscaping and planting, as set out in the Landscape Plans provided for the Proposal, in addition to the proposed conditions, will mitigate any potential adverse effects of the proposed subdivision on residential character and amenity and will enhance the visual amenity values for both future residents of the proposed dwellings and neighbouring properties.

9.2 Accordingly, for the reasons set out above, I consider that any effects of the Proposal on residential character and amenity would be no more than minor.



Carina McQueen
17 June 2022