

**Before the Independent Hearings Panel
Proposed Wellington District Plan**

**Opening Statement of Shannon Bray
2 May 2024**

Mōrena.

My name is Shannon Bray and I am a Registered Landscape Architect based in Hastings. I have provided evidence in regard to the coastal environment as it has been mapped by Council across the Horokiwi Quarry site.

Although I wasn't in attendance at the hearing this week, I have watched the recording of the panels questioning of Mr Anstey, and I have been briefed on some of the other aspects of the hearing relating to the quarry by Horokiwi's planner, Ms Pauline Whitney.

I understand that the panel requested I meet with Mr Anstey between his questioning and today. My apologies, I have attempted to contact Mr Anstey a few times yesterday but unfortunately, we have not been able to connect.

However, my understanding is that the panel are very aware of both my position and Mr Anstey's position. On this basis, I thought it would be useful to provide a summary of where I see us agreeing and disagreeing.

Firstly, I want to say I generally agree with the broad concepts about managing landscape that Mr Anstey promotes, and indeed I would like to say that Clive and I are old friends in talking about the challenges of landscape management, particularly in a legislative context. I agree with him when he says "landscape lines on a map are problematic" – landscape is, as he says, "a functioning whole" that has coherence.

Unfortunately, we live in a world that is defined by lines. The NZCPS and policies at regional and district level require us to define the Coastal Environment, and by default it means drawing a line even though as landscape architects we don't really want to.

I also fully appreciate the challenge Council's have at drawing such lines at a broad scale. At such a scale it's necessary to have a relatively simplistic methodology that can be applied without the need for very fine-grained assessment – because to assess every site across every area of the district is simply impractical.

But, in my experience, this is what a submissions process is for. It allows Council to undertake a broad scale assessment and then invite landowners and the community to question or challenge any assumptions. This is what we have done for Horokiwi.

However, both Mr Anstey and Mr Sirl appear reluctant to then consider such submissions because of a potential "knock on" or precedent effect. Mr Anstey suggests future developers could challenge where the line goes, and Mr Sirl suggests it could have implications for sites such as the Port or Airport. It is this concern that appears to be the key issue of concern, rather than the landscape values themselves.

Firstly, I would point out that such other parties or landowners have not submitted in this manner – we are talking about Horokiwi and Horokiwi only.



But, putting this to one side, as I have set out in my evidence, what matters most are the values being assessed. These are well covered by Policy 1 of the NZCPS – and Mr Anstey in his supplementary evidence noted “the approach applied in the 2014 Boffa Miskell report and that of Mr Bray are consistent with Policy 1”. He goes on to agree that the natural character in the area I have assessed across the Horokiwi site is low – which I believe you discuss with him on Monday. And I must admit I was interested that Mr Anstey admitted on Monday that he hadn’t actually assessed the values, rather he relied solely on the report – so essentially the generalist methodology – undertaken by Boffa Miskell.

Let’s just, for arguments sake, consider utilisation of my methodology across the airport or port – in other words, assess these sites against Policy 1. In your own words, sir, I don’t think you need me to say that both of these sites don’t need a landscape architect to define – there are certainly parts of both locations that are clearly within the coastal environment. Indeed, both have protruding features into the CMA. Adoption of my detailed methodology for these sites would be unlikely to change the outcome – it might just help guidance on how far back to set the line.

On Monday you talked about urban areas, such as Kilbirnie and some of the CBD being within the CE, and referred to the 2014 Boffa Miskell methodology which highlights the challenges associated with such situations. As you mentioned, this is often when you need expert assistance – to define the line we don’t want to define – and whilst I haven’t directly assessed these situations, I would generally agree that on the flatter areas, it is evident you are in the coastal environment even a couple of streets back from the coastal edge. This is displayed visually in vegetation choices around homes and seeing marine birds, but is also experienced in the feel, smell and sight of sea air. Recently I had coffee outside a café in Seatoun, and was joined by a couple of seagulls and a brisk, salty air. The name itself, Seatoun, also contributes. But the line is blurry and your experience could alter from one day to the next.

But Horokiwi is none of these situations. It sits behind a clear, defined ridgeline, and when you are within the working quarry behind this line there is little evidence of being near the coast. The activity of the quarry is all consuming, and its impacts have changed its landscape values. This hasn’t happened recently – it’s been operating for 90 years, and it will continue to operate beyond the life of this District Plan.

Mr Anstey argued that time is irrelevant – that 100 years ago Kilbirnie was a swamp and the coastal processes that created it remain evident. But I would argue ... couldn’t that apply to all of New Zealand? I regularly walk from my house up Te Mata Park in Hawke’s Bay – some 400m above sea level and 6km from the coast. On this walk there are many places where intact seashells are clearly evident in the paths and rock faces, and the morning easterly breeze has the bitterness of it having come from the sea. But this is not a coastal environment – it once was, but time has altered it.

This will happen at Horokiwi. As I set out in my evidence, it was once in the CE, but time – and activity – has changed this. It will likely change again sometime long in the future. These changes may mean it returns to the coastal environment in the future. District Plans, policies, and lines on a map change and adapt. This is why we need to fundamentally come back to values.

From what I have read and heard, Mr Anstey and I do not disagree about the values. In my opinion, he applies a more philosophical method to determining where the line exists – by his own words approximate and based on likely historical landform. Rather, my methodology is based on the values present today and the values likely to present for the life of this District Plan.

I welcome your thoughts and questions.

Shannon Bray
Registered Landscape Architect
