

**Before the Independent Hearings Panel  
At Wellington City Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** the Proposed Wellington City District Plan

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**Supplementary statement of evidence of Clive Anstey**

**Date: 19 April 2024**

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## **INTRODUCTION**

- 1 My full name is Clive Anstey. I have been self- employed as a Landscape and Resource Consultant since 1999. Prior to this I spent 31 years in the Public Service; the Forest Service, the Ministry of Forestry, and finally, the Department of Conservation.
- 2 I have prepared this statement of supplementary evidence on behalf of the Wellington City Council (the **Council**) in respect of technical related matters arising from expert evidence submitted by the people listed below to support the submissions and further submissions on the Proposed Wellington City District Plan (the **PDP**).
- 3 Specifically, this statement of evidence relates to the matters of the Coastal Environment and Natural Features and Landscapes addressed in Hearing Stream 8.

## **QUALIFICATIONS AND EXPERIENCE**

- 4 Paragraphs 5 and 6 of my Evidence-in-Chief sets out my qualifications and experience as an expert.
- 5 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.

## **SCOPE OF EVIDENCE**

- 6 My statement of evidence addresses:
  - i. The expert evidence of Shannon Bray
  - ii. The expert evidence of David John Compton-Moen

## RESPONSES TO EXPERT EVIDENCE

### Shannon Bray, Horokiwi Quarries Limited

- 7 I have read the evidence of Shannon Bray dated 12<sup>th</sup> April 2024. This reiterates his earlier position but in greater detail, and supported by additional evidence. Mr Bray's position is very clear; in his opinion the boundary of the coastal environment should be relocated to exclude the Quarry. Mr Bray has undertaken a comprehensive assessment of the quarry site and finds the Natural Character to be minimal; the site has been highly modified by the cultural activity of quarrying. On this basis Mr Bray argues that the quarry site does not qualify for inclusion within the Coastal Environment.
- 8 The visual material provided by Mr Bray is extremely helpful; the quarry site clearly retains little of its original coastal natural character and on this basis Mr Bray argues that the site should not be located within the Coastal Environment. While agreeing that the site retains little of its original character I continue to be of the view that the site is never the less within the Coastal Environment as defined by Boffa Miskell assessment and adopted by Wellington City Council in their Proposed Plan.
- 9 I do not believe there to be any benefit in traversing the nuances addressed by Mr Bray in interpreting Policy 1 of the NZCPS 2010 and the RPS Policy 4. Both of these policies, and the NZILA Guidelines, support Mr Bray's contention that defining the boundary of the Coastal Environment can be fraught. I believe that in undertaking their assessment of the coastal environment and in establishing its boundary Boffa Miskell have been clear in adopting Mr Brays 'contour approach', at least where topography makes such an approach appropriate. In my opinion this approach is appropriate along the western side of the harbour.
- 10 Mr Sirl sought my opinion on Policy 4 of the RPS, with respect to the point raised by Ms Whitney in her evidence that Council has neglected to undertake an assessment of the coastal environment as it relates to the Horokiwi Quarry site. In my opinion, the RPS Policy 4 is simply an

abbreviation of the NZCPS Policy 1. Both the approach applied in the 2014 report and that of Mr Bray are consistent with the Policy 1 of the NZCPS and Policy 4 of the RPS, that is not in dispute. However, the approach applied by Mr Bray in my view considers more than simply coastal 'influences' and seeks to reduce the landward extent of the coastal environment on the basis of relatively low natural character values which is inconsistent with the approach applied across the city. I note that in the executive summary of their 2016 Assessment Boffa Miskell say that their assessment "*has been undertaken to give effect to the requirements of the Regional Policy Statement and the NZCPS 2010.*" I accept both their interpretation and their application of these policies along the western edge of Wellington Harbour.

- 11 In my opinion the boundary through the quarry site is consistent with the coastal boundary location along the wider coastal environment and there is no reason to suppose that the coastal influences would be any different at the quarry site, regardless of the sites degree of 'natural character'.
- 12 In his table at para 4 Mr Bray links his assessment back to Policy 1 of the NZPS. He concedes at 1.2i that; "*Where I land in my assessment is that **the active quarry site was likely to have once been in what we now define the coastal environment.** However over an extended period of excavation, its relationship to the coast has diminished significantly (as outlined in the points above).*" But has the relationship of the coast to the site changed? I suspect not.
- 13 At 1.2e of his table Mr Bray says; "*Overall, it is considered that **the active quarry site has very limited coastal vegetation and habitat.** The area with more significant coastal vegetation is the coastal facing hillside above SH2 at the base of the active quarry.*" Coastal vegetation extending beyond the escarpment makes intuitive good sense.
- 14 And at 1.2h Mr Bray says; "*Beyond the site, including the coast-facing hillside and unquarried areas above the site, **some coastal vegetation is retained.** As identified above, this has varying degrees of habitat significance, and other areas that haven't been quarried, are in various*

*stages of native vegetation regeneration through natural succession and re-vegetation planting.”*

- 15 In my opinion the notified extent of the coastal environment as it relates to the Horokiwi Quarry site is appropriate in being consistent with the western harbour boundary generally, and in having an environment subject to similar coastal influences. None of the western harbour coastal environment was assessed by Boffa Miskell as having High or Very High Natural Character and the quarry site is no exception. I agree with Mr Bray in assessing the Natural Character as low.
- 16 Coastal environments with High or Very High Natural Character within the Wellington City boundaries tend to be limited to the more remote and inaccessible parts of the coast. In the more developed areas of the Coastal Environment cultural activities have assumed dominance so that little, if any, of the Natural Character remains. This does not exclude such areas from being a part of the Coastal Environment and the quarry site is no exception.
- 17 I recommend that the boundary as notified be retained. If however the Hearings Panel is of a mind to shift the boundary to exclude the quarried area I would suggest that the area excluded be limited to worked areas. The areas that have not been subject to quarrying should remain within the coastal environment; these areas have a similar character and quality to those along the harbour edge to the south.

**David John Compton-Moen, Parkvale Road Limited**

- 18 I have read the evidence provided by David John Compton-Moen. I have also read the evidence provided by Mitch Lewandowski. With the benefit of having read the evidence they provided I visited the site on Tuesday 16<sup>th</sup> April.
- 19 In my opinion the evidence provided is comprehensive and I find the arguments in favour of the development “...based on an indicative concept plan for residential development of the site...” (Mr Compton-Moen’s evidence, para 10) compelling. Both Mr Compton-Moen and Mr Lewandowski do however acknowledge the potential visual and

landscape effects for the owners of 173 and 175 Parkvale Road, and for users of the Skyline Walkway. In my opinion these effects can only be adequately assessed on the basis of a comprehensive development proposal showing detail of earthworks, vegetation cover (retained and proposed), and building location (and design.) These effects will be significant regardless of where the boundary of the Ridgelines and Hilltops boundary is located, particularly the effects of *'type1 Proposed Units'*.

- 20 The question for me is whether the 'Landscape and Amenity' effects will be adequately addressed at the resource consent stage without the existing overlay. While not necessarily preventing development the presence of the overlay does provide a higher threshold when assessing the Landscape and Visual effects. The integration of development along the lower slopes of Karori's surrounding hills is a defining feature of its character. The proposed development is largely consistent with this character.
- 21 Residential development in Karori has traditionally been constrained by topography and the boundaries follow contours along steeper slopes. I therefore agree with Mr Compton-Moen in his acknowledgement of contours as appropriate boundaries to ensure that development is integrated into the natural landform. In my opinion however the boundary needs to reflect both landform constraints and the visual constraints to ensure that the integrity of the wider as well as the more immediate landscape is respected.
- 22 On balance I am inclined to recommend that the existing boundary be retained. However, I would support the suggestion of Mr Compton-Moen, subject to the 260masl boundary strictly following the contour so as to reflect the natural patterns of the landscape.
- 23 The Ridgelines and Hilltops Overlay recognises not only the significance of skylines but also the quality of the environment across lower slopes, particularly along urban edges. The importance of woody vegetation across steep slopes is being increasingly recognised for soil and water retention and management values. Resource management requires that

resources are recognised as having multiple values and these values often need to be managed in an integrated way.

**Date:** 19 April 2024

Clive Anstey