

**BEFORE THE INDEPENDENT COMMISSIONER**

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**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of a Notice of Requirement from the Palmerston North City Council for a designation of a new road connection between Abby Road and Johnstone Drive, Palmerston North

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**STATEMENT OF EVIDENCE OF CHANTAL WHITBY FOR THE REQUIRING  
AUTHORITY**

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Dated: 16 March 2021



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## **STATEMENT OF EVIDENCE OF CHANTAL WHITBY FOR THE REQUIRING AUTHORITY**

### **INTRODUCTION**

- [1] My name is Chantal Louise Whitby and I am a landscape architect at Hudson Associates. The practice consults on projects throughout New Zealand, with a particular focus on landscape assessment, subdivision, large scale design, and infrastructure. I am registered landscape architect member of the New Zealand Institute of Landscape Architects. I am also a core committee member of the New Zealand Association for Impact Assessment and an associate member of the Environment Institute of Australia and New Zealand, as well as a coordinator for their Far South branch. I have undertaken landscape character, natural character and visual amenity assessments for projects across a range of areas in New Zealand.
- [2] The following evidence addresses the landscape character, natural character and visual amenity effects of a Notice of Requirement (NoR) application by Palmerston North City Council (PNCC). Hudson Associates also wrote the assessment of landscape effects that accompanied the application for the NoR.
- [3] In preparing this evidence I have read and considered the following additional material:
- (a) Submissions.
  - (b) Section 42A report of Shannon Bray.
  - (c) Proposed conditions to apply to the Designation, at Appendix 1 of Ryan O'Leary's s 42A Report.

### **CODE OF CONDUCT**

- [4] I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

## THE PROPOSAL

- [5] [Slide 1](#): the application is for a Notice of Requirement (NoR) for a road designation within Palmerston North city in the Aokautere Development. [Slide 2](#): the site lies on the western side of the Manawatu River.
- [6] [Slide 3](#): the purpose of the application is to extend Abby Road to form a connection with recently constructed Johnstone Drive. [Slide 4](#): the Project will cross the upper section of Abby Road Gully.
- [7] [Slide 5](#): two alternative alignment options have been considered. [Slide 6](#): one being the Northern Alignment (Option 1) and the other being slightly south and called the Southern Alignment (Option 2).

## EXISTING ENVIRONMENT

- [8] [Slide 7](#): Aokautere is composed of a series of flat terraces, incised by a network of ephemeral gully and stream systems that feed into the Manawatū River, one of which is Abby Road Gully.
- [9] [Slide 8](#): there is an absence of development across most gullies within the area. [Slide 9](#): however, a small number of gully crossings exist. Together this pattern contributes to the character of the area.
- [10] [Slide 10](#): most of the northern boundary of the application site borders the Council managed Manga o Tane Reserve. [Slide 11](#): the landform of the pre-existing natural gully has been changed, however, Manga o Tane Reserve has now been replanted with native vegetation.

## LANDSCAPE AND NATURAL CHARACTER EFFECTS

- [11] [Slide 12](#): both roading alignment options will result in changes to the landform of Abby Road Gully as a result of necessary cut and fill. Option 1 is slightly longer which allows reduced road height in the middle section of the road and enables the road to more closely follow the contours of the gully, as well as creating the need for less fill.
- [12] [Slide 13](#): Option 2 has a slightly shorter road length, more fill, sits higher above the valley floor and is more distant from the Mango o Tane Reserve.

- [13] *Slide 14*: the designation intersects the area of the gully which has already undergone previous earthworks. Due to previous modifications, there is no existing vegetation other than weed species within the designation area.
- [14] *Slide 15*: Option 1 will directly abut Manga o Tane Reserve, enabling mitigation planting on the northern side of the road to integrate effectively with existing vegetation in the adjacent Reserve. Option 2 will not enable this connection and the mitigation this allows.
- [15] *Slide 16*: the Aokautere Structure Plan proposes a local centre south-east of the Project, as well as further residential development on the terrace adjacent Abby Road Gully. The proposed road contributes to enabling improved traffic circulation and connectivity, as addressed by my traffic engineer colleague.
- [16] *Slide 17*: overall, it is concluded that Option 1 and Option 2 will result in moderate adverse effects on landscape character and low adverse effects on natural character. While both designation options will result in the same level of effects, Option 1 is preferable as it will enhance the ability to mitigate adverse effects of the proposed road and to create an integrated buffer between the northern road edge and Manga o Tane Reserve. Option 1 is also more sympathetic to the natural contours of Abby Road Gully and, therefore, is more in keeping with the area's landscape character.

#### **VISUAL AMENITY EFFECTS**

- [17] The low profile of the road will ensure that rural vistas enjoyed by surrounding residents will not be interrupted. Additionally, the road extension will increase public views of, and access to, Abby Road Gully and Manga o Tane Reserve.
- [18] Overall, it is concluded that Option 1 and Option 2 will result in moderate adverse effects on visual amenity.

#### **SUMMARY OF MITIGATION FACTORS**

- [19] *Slide 18*: it is anticipated that if the recommended mitigation measures outlined in the landscape report are followed, then the Project will enhance ecological values for the top section of Abby Road Gully. While landscape character effects will remain moderate with the implementation of the proposed mitigation

measures due to the proposed earthworks, natural character effects will reduce from low to very low.<sup>1</sup>

- [20] *Slide 19*: it is expected that full revegetation of earthworks, embankments, and the area between the northern side of the road and Manga o Tane Reserve will significantly reduce any adverse visual amenity effects, with revegetation between the road and Reserve likely to increase visual amenity for nearby residents. Both options will have moderate-low<sup>2</sup> visual amenity effects if revegetation occurs on all cut and fill embankments and between the northern road edge and the boundary of the Reserve.

#### **S42A REPORT AND SUBMISSIONS**

- [21] The Council Officer generally agrees with the conclusions drawn in the landscape assessment and supports the mitigation planting between the road and Manga o Tane Reserve, concluding that with mitigation, effects for landscape and natural character will be low. The Council Officer provides further details on visual amenity effects from specific properties, overall, these confirm the description of effects concluded by Hudson Associates.
- [22] In addition, the Council Officer has recommended that a planting plan is provided as part of the Outline Plan, as well as a landscape maintenance plan. It is also recommended that the Project includes the use of directional LED lighting to reduce light spill beyond the designation boundary. These recommendations have been captured in the conditions outlined in Ryan O’Leary’s s42A Planning Report as part of the Landscape and Public Access Plan. I accept these recommendations and conditions, with the process for implementing these occurring after the designation has been granted.
- [23] Submitters Bo Yu and Lynne Bishop raised concerns regarding proposed earthworks, including the visual impact of earthworks and the infilling of Abby Road Gully. In response to these concerns, it is considered that with the implementation of mitigation measures landscape character effects will be

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<sup>1</sup> There is an error in the first bulletpoint of paragraph 92 in the landscape report, natural character effects should be recorded as very low after mitigation, as outlined in Table 6.0.

<sup>2</sup> There is an error in paragraph 83 in the landscape report, visual amenity effects should be recorded as moderate-low after mitigation, as outlined in Table 6.0.

moderate, natural character effects will be very low, and visual amenity effects will be moderate-low. These effects are not considered significant.

- [24] *Slide 20*: while the earthworks will result in the division of the gully and add additional fill, which will further interrupt the natural pattern of the gully, the designation intersects the area of the gully which had already undergone previous earthworks and has reduced natural values. In addition, as part of mitigation, PNCC will fully revegetate the fill batters on both sides of the road and the Abby Road Gully within the designation area. This will help maintain and increase the sense of naturalness and visual amenity within the area, as well as integrate the Project with Manga o Tane Reserve. Furthermore, mitigation planting will significantly reduce adverse visual amenity effects by screening and softening the road. Mitigation also includes facilitating the opportunity for a walkway connection through to the Reserve. Option 1 was selected as it required less fill than Option 2 (approximately a fill depth of 6m will be required in the middle of the gully for the Project) and because it followed the natural form of the gully more closely.
- [25] *Slide 21*: Aokautere Land Holdings Limited has also raised concerns regarding the Project. Namely the submitter questions the logic and necessity of a road in this location, the number of future lots the road will serve, and the width of the designation. The proposed road aligns with the Aokautere draft structure plan. One of the principles highlighted in the structure plan is increased connectivity and the avoidance of cul-de-sacs, with a network of streets that enable connected neighbourhoods and that offer a choice of pathways. The Project will transform a no-exit road into a connection road between neighbourhoods on either side of the gully.
- [26] *Slide 22*: the Project has allowed for a 19m wide corridor, this includes the carriageway, berms and footpaths. One of the mitigation measures includes providing pedestrian access along the road to add further amenity value and connectivity. The overall width of the designation ensures that required mitigation measures can be implemented, including necessary mitigation planting on all embankments/fill batters and between the proposed road and Manga o Tane Reserve within the designation. This necessary mitigation planting assists in reducing visual amenity and natural character effects. Furthermore, revegetation within the proposed designation area effectively integrates the road with existing

vegetation in the adjacent Reserve, contributing to existing land use patterns and allows walkway connectivity from the new road directly to Manga o Tane Reserve, thereby enhancing the recreational and pleasantness aspects of amenity values (as an aspect of mitigation for the new road).

## CONCLUSION

- [27] *Slide 23*: overall, it is considered that the Project delivers a road for which potential adverse effects can be effectively mitigated. Restoration and revegetation of Abby Road Gully within the designation will help maintain the sense of naturalness and amenity, which are contributing elements to the character of the area.
- [28] The road extension will provide increased connectivity between the existing residential area and future residential area located west of Johnstone Drive. It will also service further extension of residential development on the Abby Road terrace.
- [29] Of the two options, Option 1 is more sympathetic to the landform of the gully and reduces the amount of fill required. Option 1 will also enable necessary mitigation planting to be undertaken by connecting with the adjacent Manga o Tane Reserve.
- [30] With the recommended mitigation measures, the proposed development is considered appropriate both in scale and form, as well as in regards to the landscape character of the area.

Chantal Whitby  
NZILA  
Registered Landscape Architect



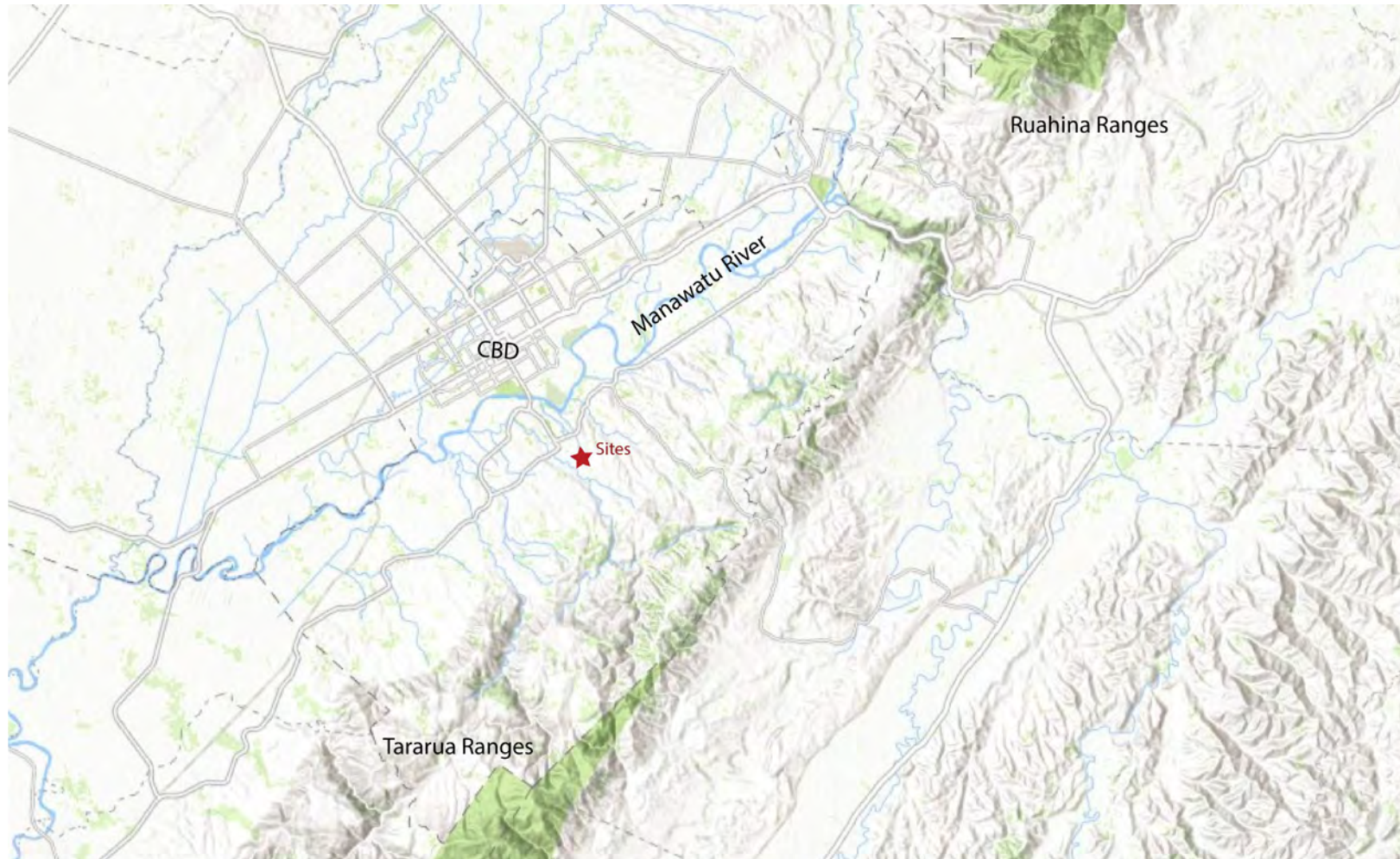
NoR for Abby Rd – Johnstone Dr Extension

Landscape evidence

Chantal Whitby

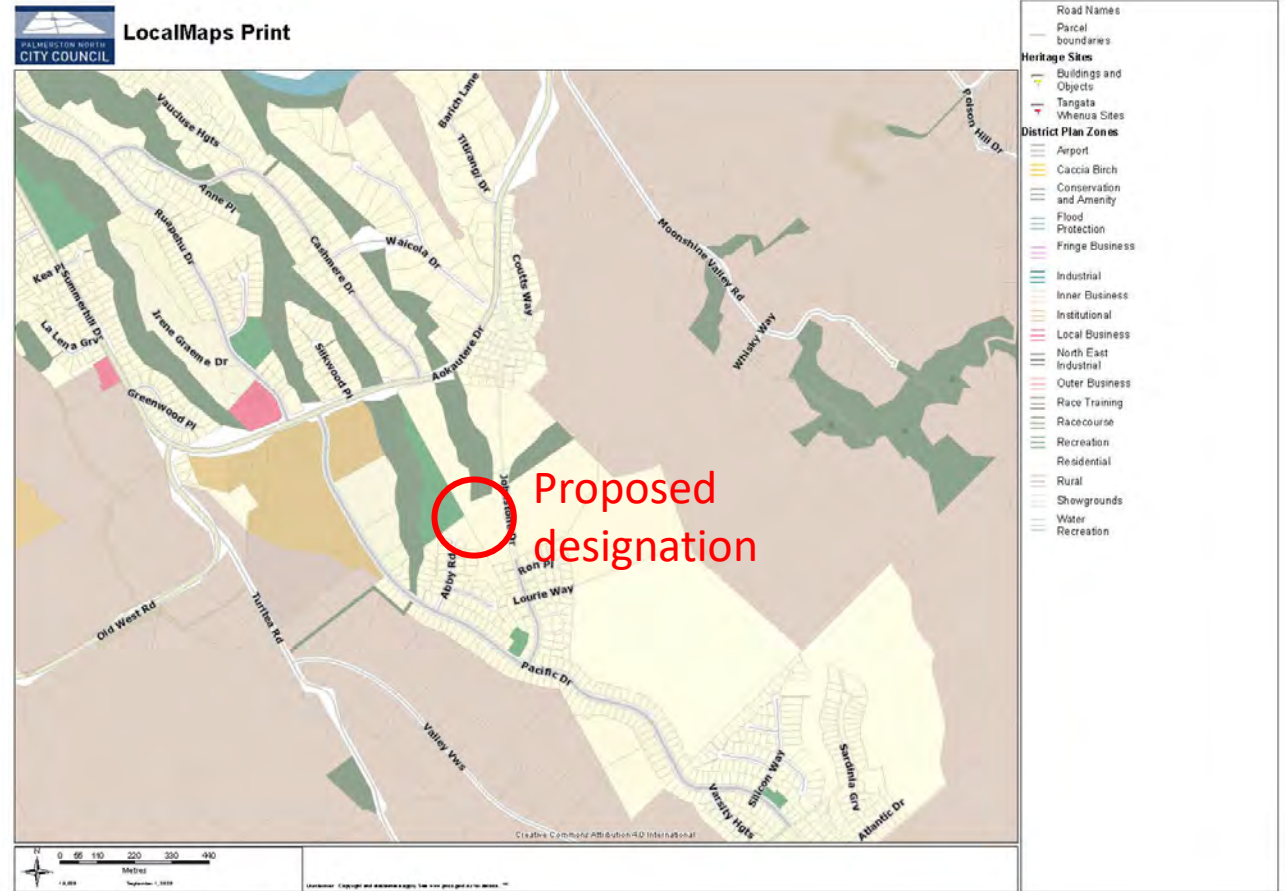


# Slide 1 Site location with wider context





# Slide 2 Site location





# Slide 3 Site location





# Slide 4    Aerial view of proposed intersection



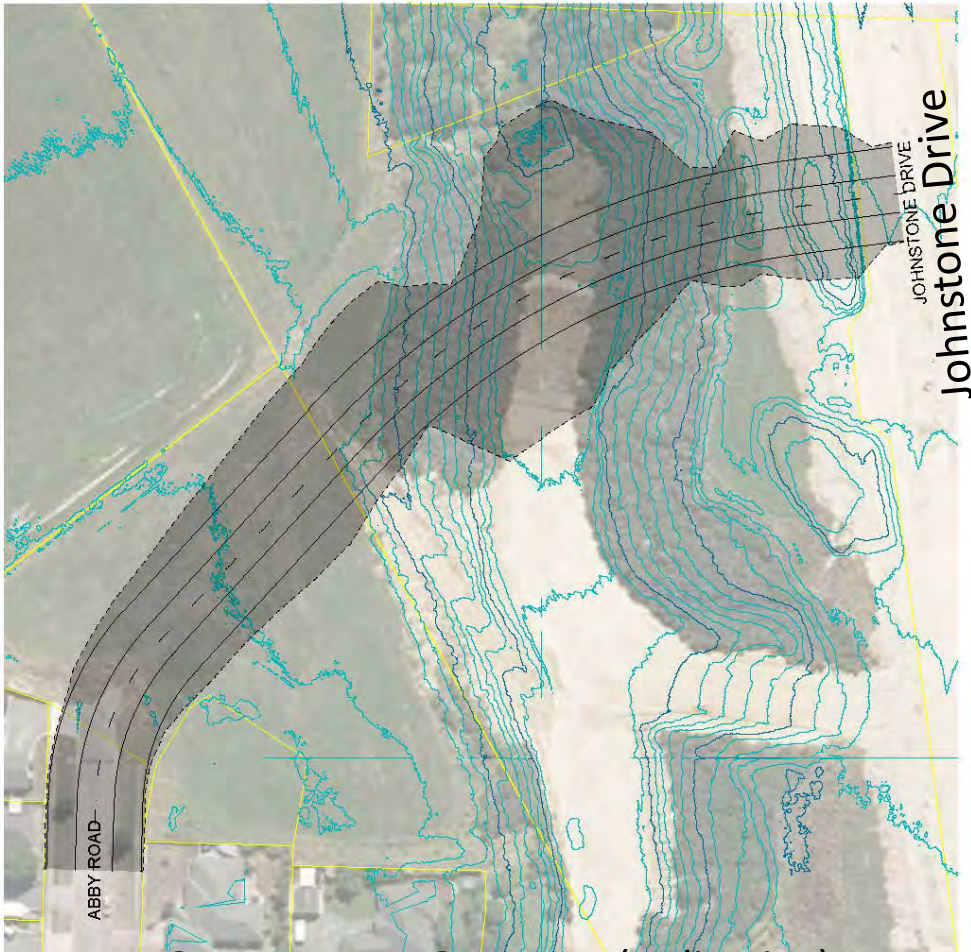


# Slide 5 Proposed alignments

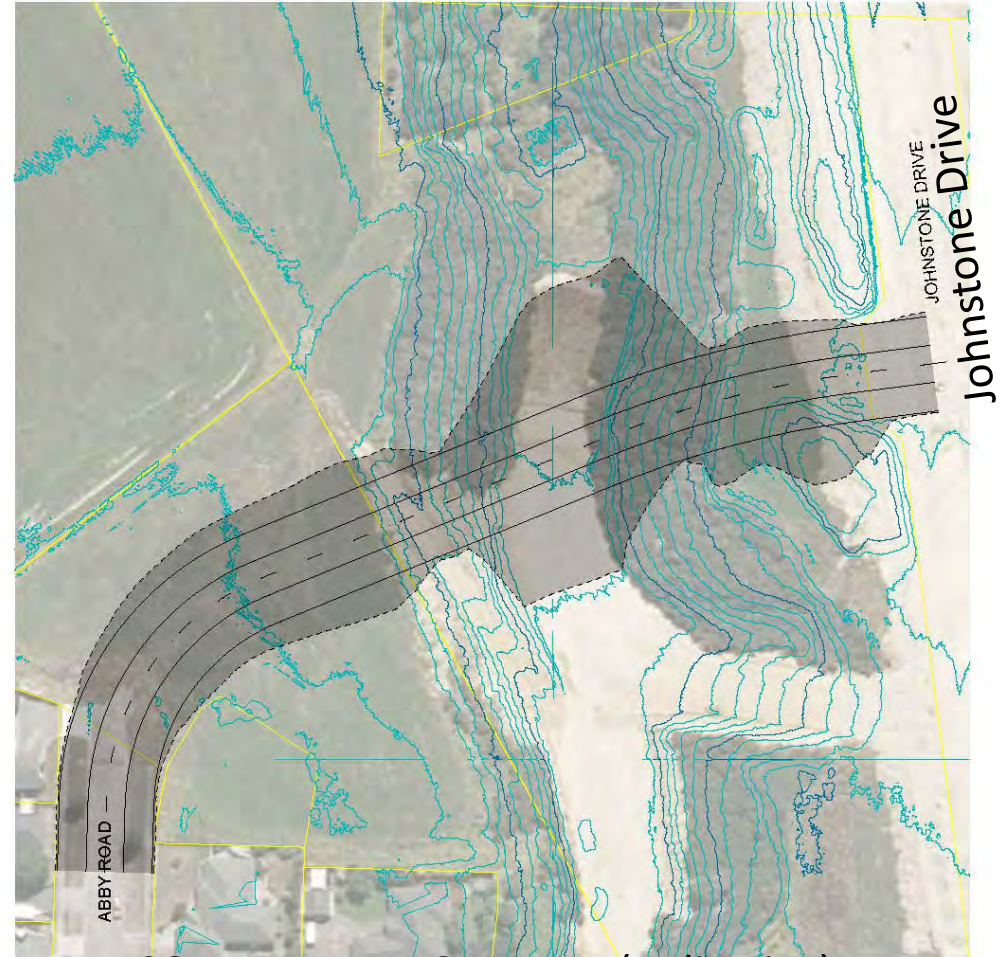




# Slide 6 Two alignment options



NORTHERN ALIGNMENT (Indicative)



SOUTHERN ALIGNMENT (Indicative)



# Slide 7 View of terraces and gullies near the site





# Slide 8 Developable land within Aokautere





# Slide 9 Existing farm track crossing gully





# Slide 10 Application site

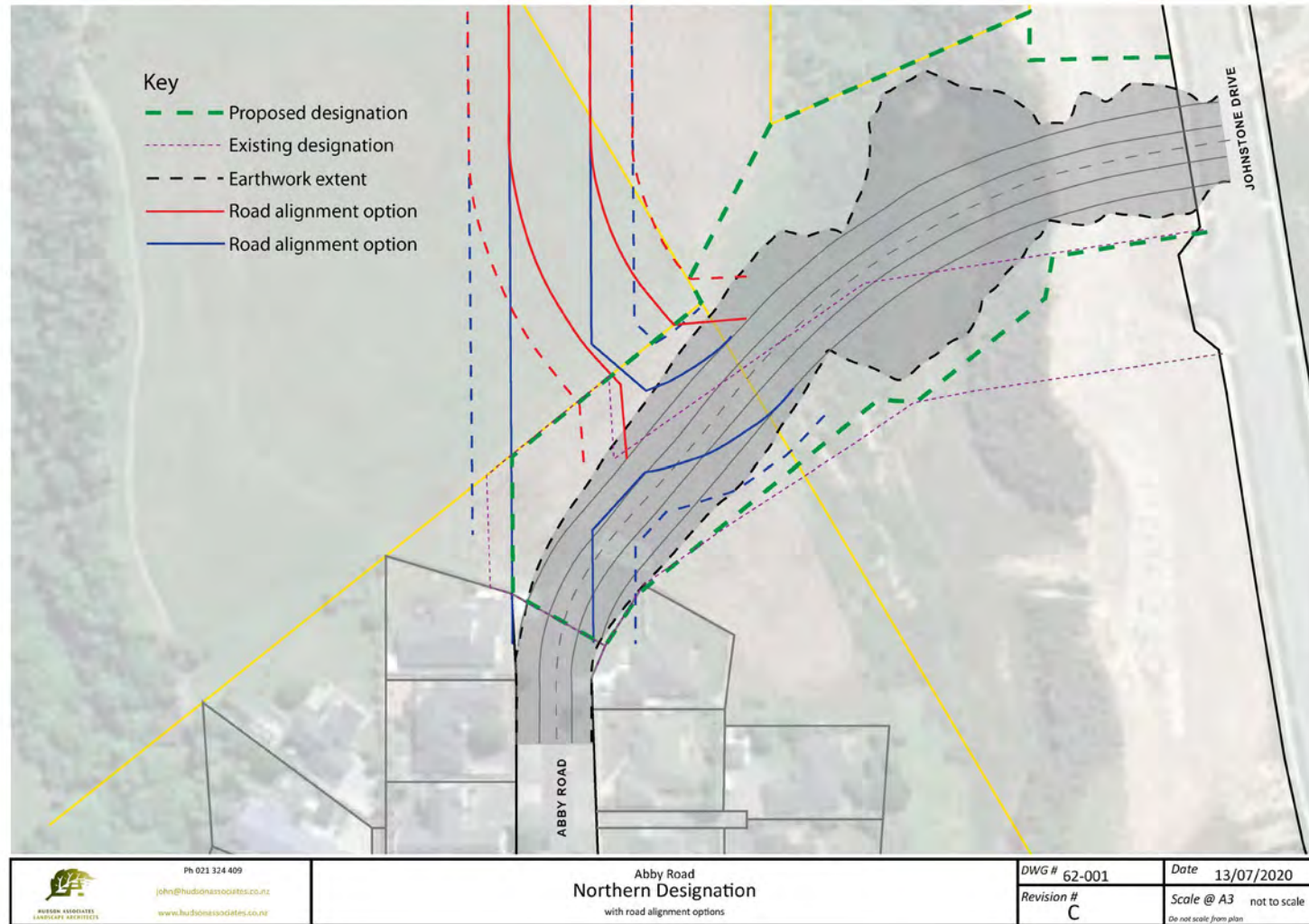




# Slide 11      Aerial view of Abby Road Gully

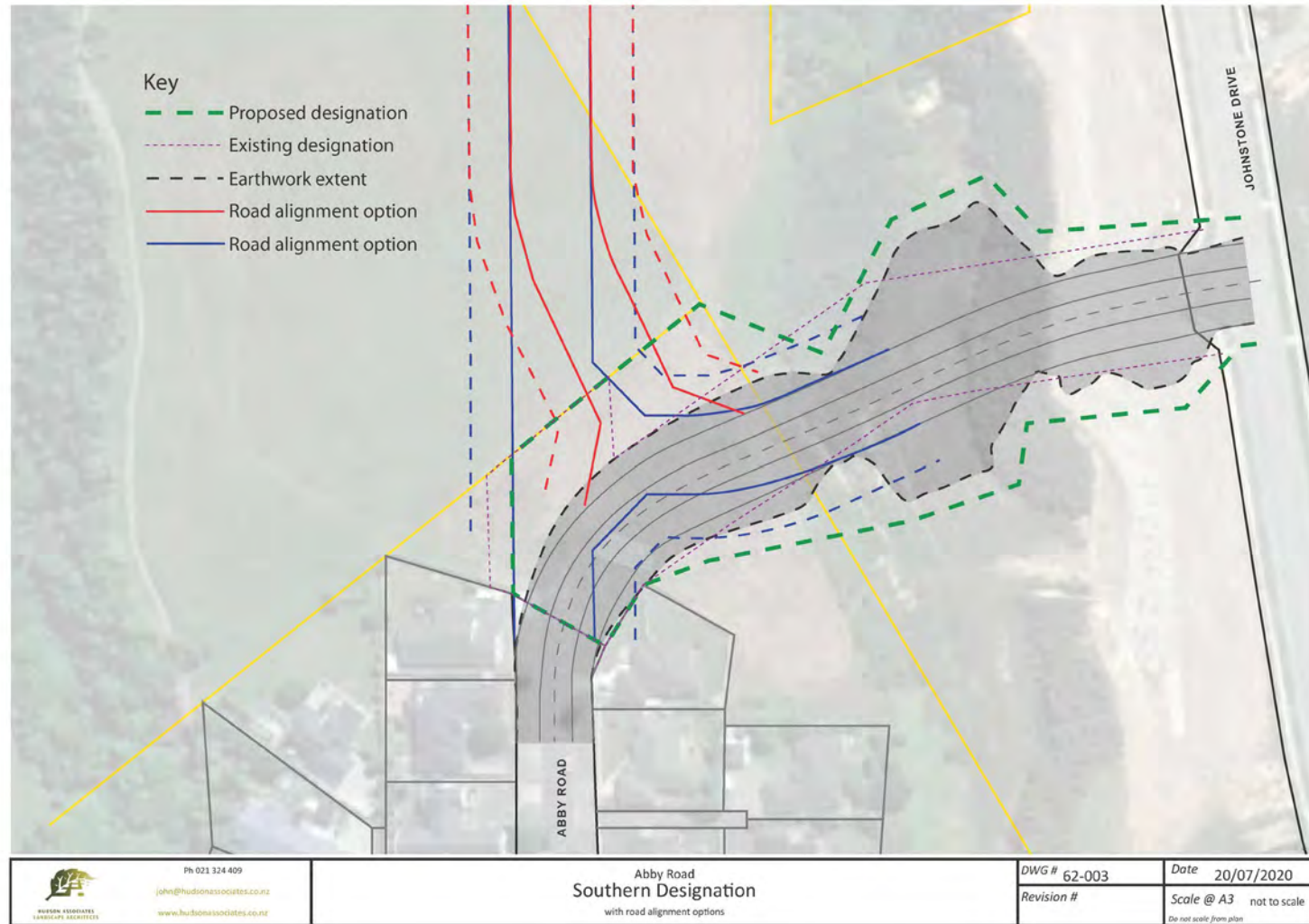


# Slide 12    Option 1, northern alignment





# Slide 13 Option 2, southern alignment

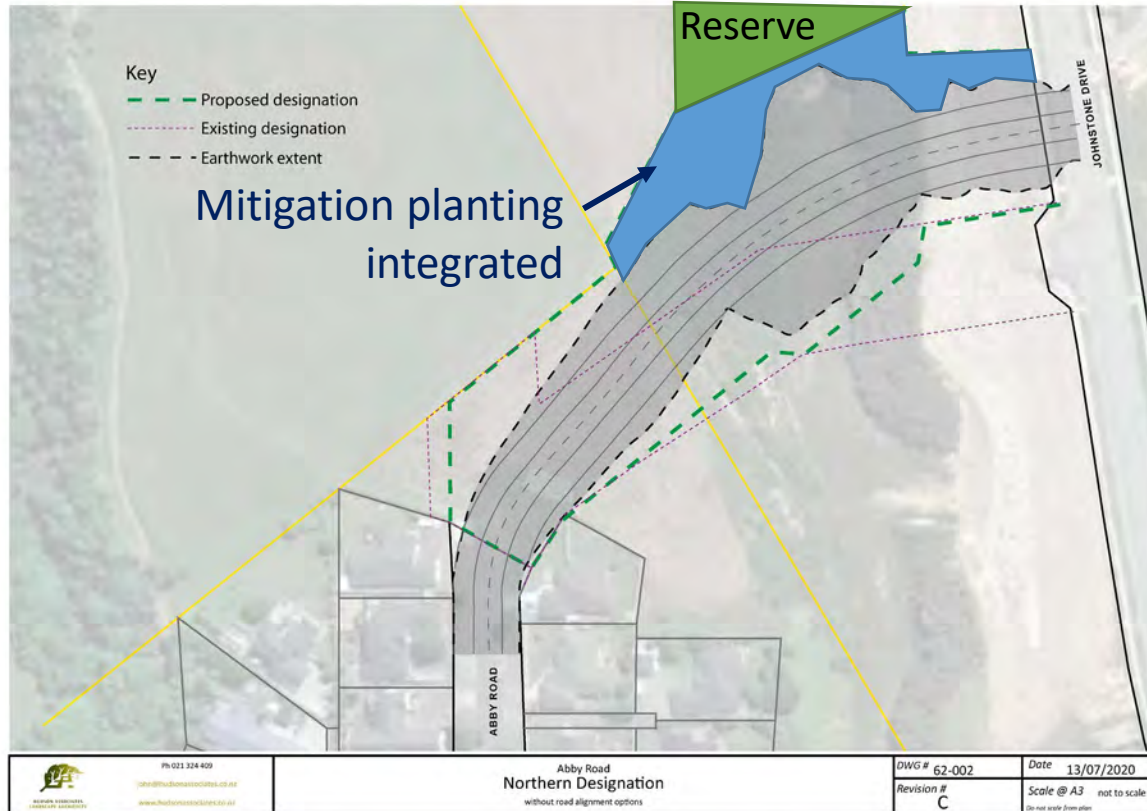


# Slide 14 Existing modifications within site

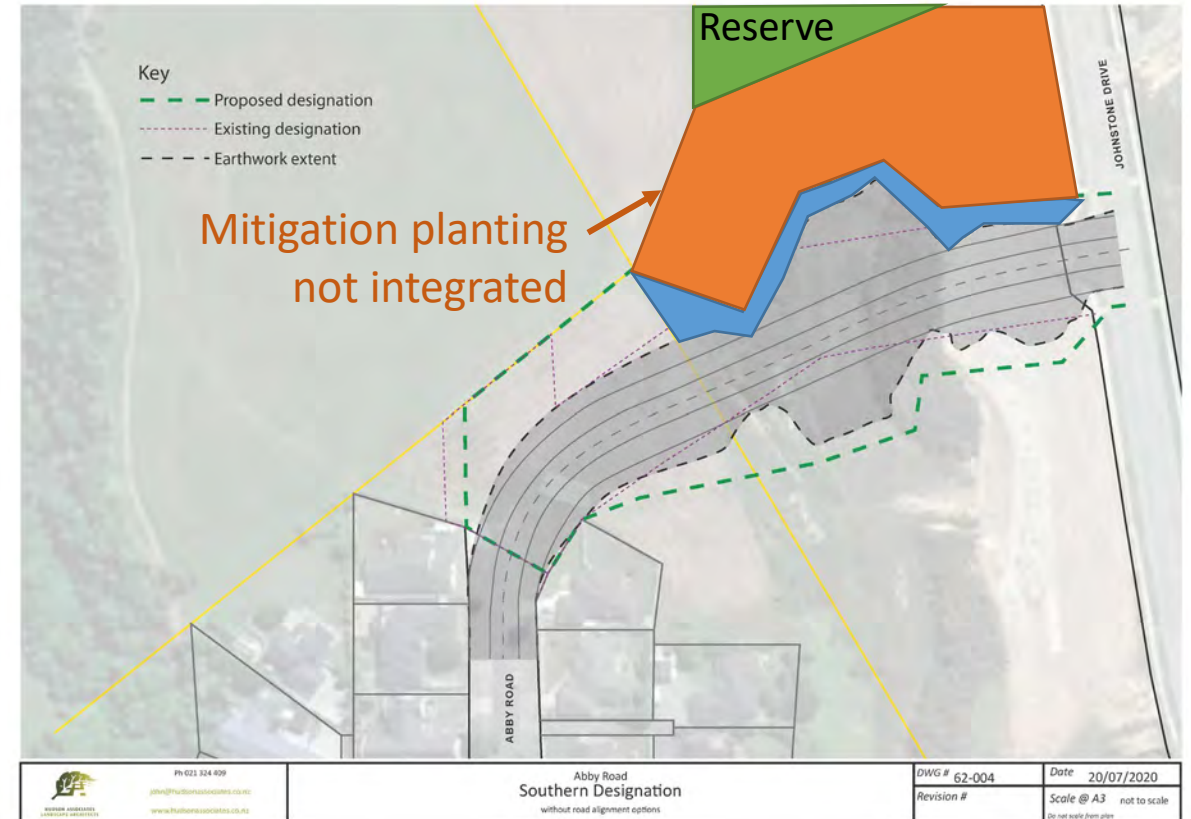




# Slide 15 Option 1 and 2 in relation to Reserve

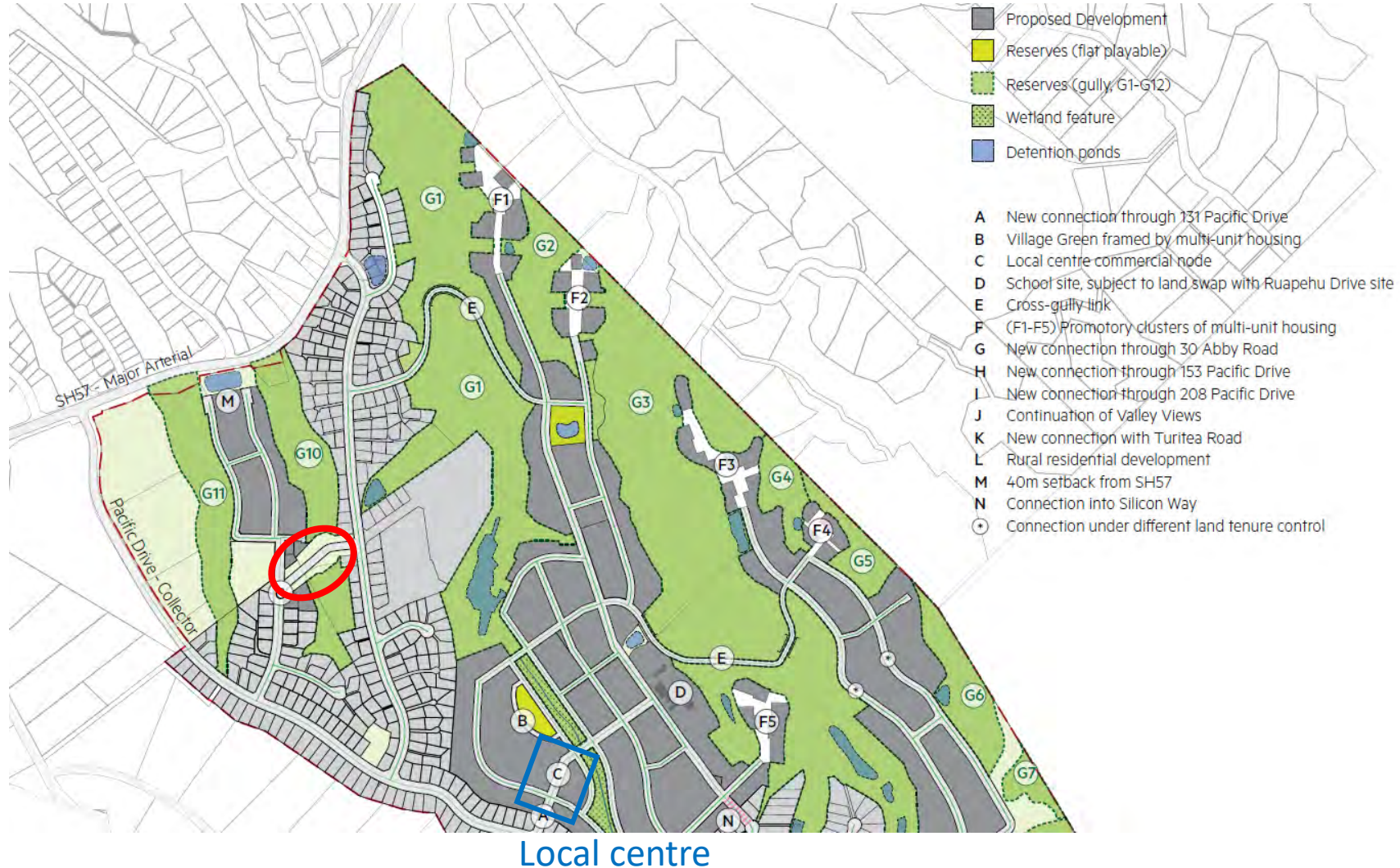


Option 1



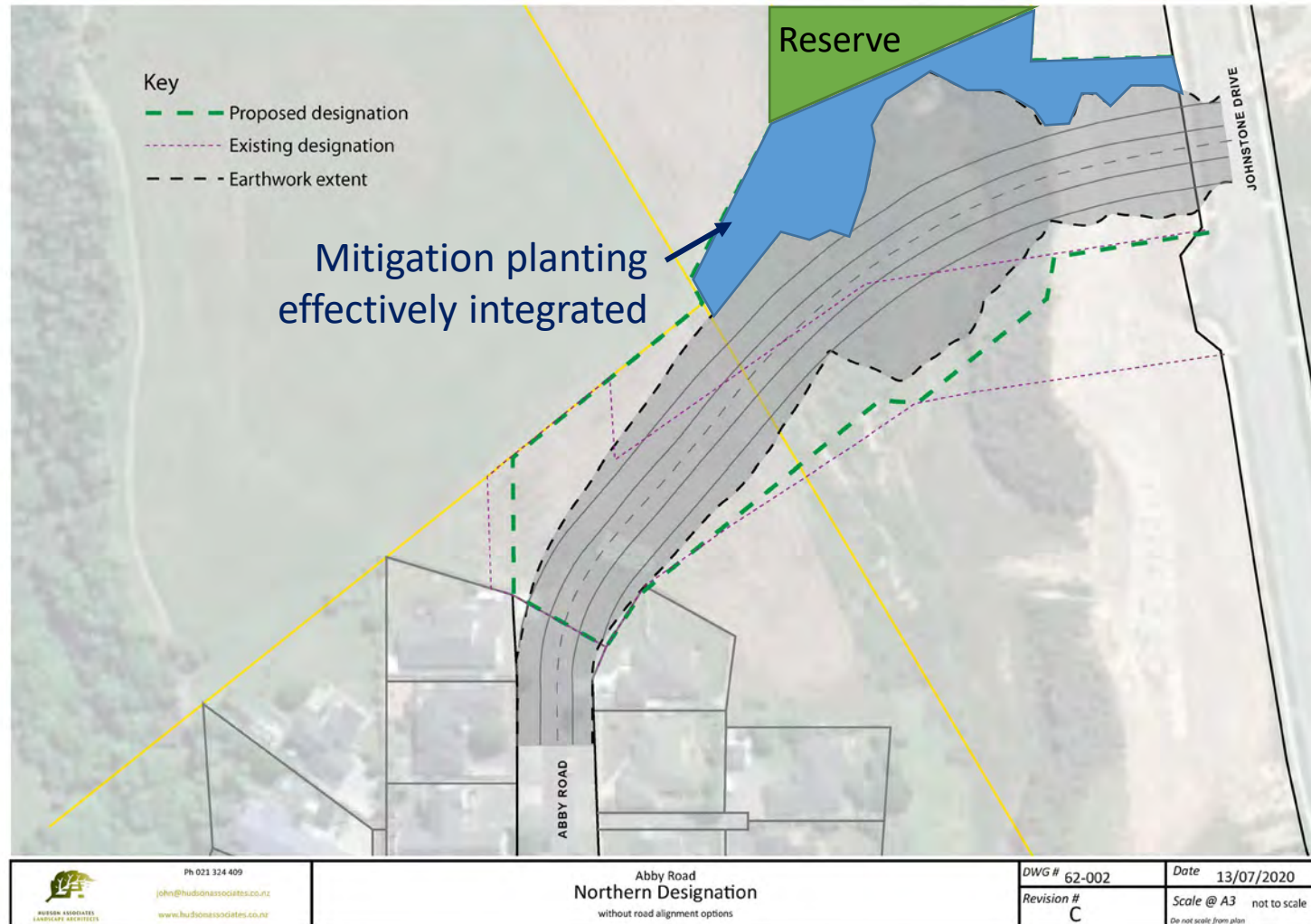
Option 2

# Slide 16 The draft Aokautere Structure Plan





# Slide 17 Preferred Option 1

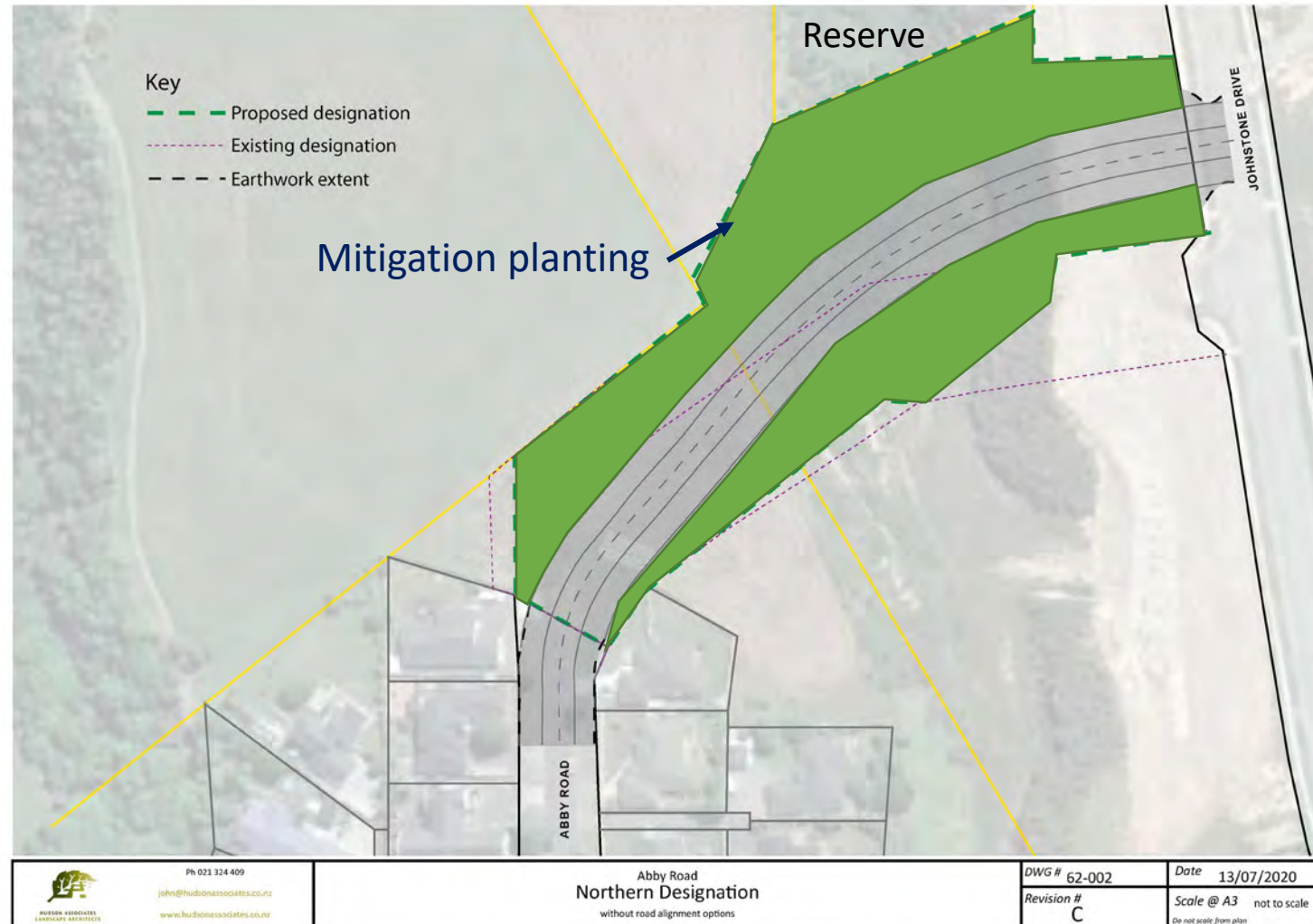


# Slide 18 Existing vegetation in Abby Road Gully





# Slide 19 Mitigation planting, Option 1



# Slide 20 Existing modification of Abby Road Gully

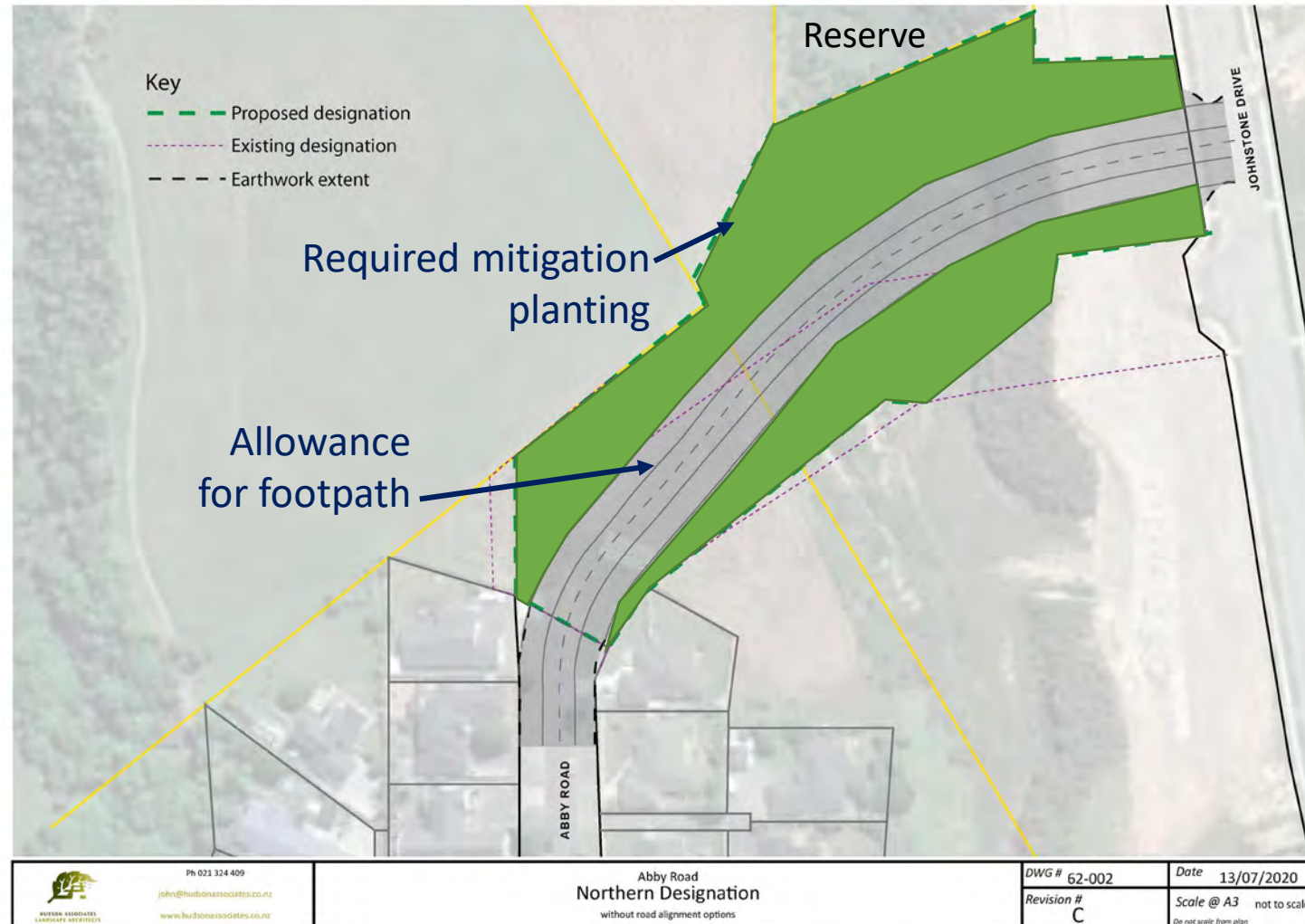




# Slide 21 Connectivity with proposed development



# Slide 22 Option 1 designation area





# Slide 23 Preferred Option: 1- northern alignment

