

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of proposed Plan Change G: Aokautere Urban
Growth to the Palmerston North City Council
District Plan

**SUPPLEMENTARY STATEMENT OF JOHN HUDSON ON BEHALF OF PALMERSTON NORTH CITY
COUNCIL**

LANDSCAPE

Dated: 11 March 2024

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SUPPLEMENTARY STATEMENT OF JOHN HUDSON

A. INTRODUCTION

- [1] My full name is John Hudson.
- [2] I prepared a s 42A report dated 15 September 2023 (**s 42A Report**) and reply evidence dated 28 November 2023 (**Reply**) on Landscape matters for PCG.
- [3] My experience and qualifications are set out in my s 42A Report.
- [4] I repeat the confirmation given in my s 42A Report that I have read and will comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023, and that my supplementary report has been prepared in compliance with that Code.

B. SCOPE

- [5] My supplementary statement responds to a number of matters raised by the Hearing Panel as part of the hearing in the week of 4 December 2023. These include:
- (a) Zoning of a portion of land on Turitea Road ('Area A');
 - (b) Zoning of the small portion of land at the southeastern corner of the Green block ('Area B');
 - (c) An alternative alignment proposed for the Turitea Valley Link Road;
 - (d) An alternative alignment proposed for the Gully 9 road crossing; and
 - (e) Potential effects on landscape values and natural character of proposed works in the Conservation and Amenity Zone.

C. ZONING OF LAND ON TURITEA ROAD (AREA A)

- [6] There is a portion of land on Turitea Road (referred to as 'Area A') that is currently zoned rural. I understand that submitter PNIRD (S45) has requested that it be zoned rural-residential.
- [7] I have reviewed the plan provided by Resonant dated 15 January 2024 .

[8] I do not support the full extent of the submitter’s proposed rural residential zoning because the low lying northwestern portion of their proposed rural-residential area contains a natural inland wetland. Dr Forbes recommends the wetland and its associated hydrologically connected areas be zoned Conservation and Amenity, which I support. It is important for landscape character that remnants of natural processes, and natural wetlands and water features are retained.

D. ZONING OF SOUTHEASTERN CORNER OF THE GREEN BLOCK (AREA B)

[9] There is a portion of land on the southeastern corner of the Green Block (referred to as ‘Area B’) adjacent to the northeastern corner of the Waters Block, that is currently zoned rural. I understand that submitter PNIRD (S45) has requested that it be zoned rural-residential. I have reviewed the plan provided by Resonant dated 15 January 2024, which includes an indicative lot configuration and building platforms.

[10] From a landscape perspective, I support the proposed lot layout on the plateau south of gully 9. It represents a continuation of the development pattern that underlies the whole PCG area i.e., houses on the plateau and preservation of the gullies. With the existing extent of proposed housing encompassed by PCG, this small additional area will have no more than a minor landscape impact.

[11] I understand Dr Forbes has recommended Conservation and Amenity zoning of the adjacent gully (gully 19). In my view this is positive. It reinforces recognition of the varying landforms of the area, with its flat tops and incised gullies, with the plateau areas zoned as residential, the gullies as Conservation and Amenity Zone and the balance areas as rural-residential. From a landscape perspective, this plateau/gully contrast is the key characteristic of the area. Therefore, I consider extending the same zoning pattern to this part of the plan change area to be appropriate.

[12] I further consider the recommended zoning will have a positive impact on Natural Character in the adjacent gully (gully 19), through the proposed Conservation and Amenity zoning for the gully area providing for protection of this gully area, and through the provisions relating to stormwater design on the plateau.

E. TURITEA VALLEY LINK ROAD

- [13] I understand the submitter PNIRD (S45) is seeking an alternative alignment for the road linking the upper terraces with the Turitea Valley floor.
- [14] I have reviewed the plan provided by Resonant dated 01 February 2024, which shows the latest proposed alignment (the **Resonant Alignment**).
- [15] The Resonant Alignment (and related calculations) show that a road can go straight up the hill to the Aokautere plateau and link in with one of the planned streets on the plateau. In comparison the notified alignment involved a sharp switchback halfway up the hill.
- [16] If the proposal is feasible from a engineering and traffic viewpoint, I am comfortable with the alignment moving up the hill. The alternative, as shown in the notified alignment, would have resulted in necessary cut and fill on the sharp switch back corner. The Resonant Alignment avoids that cut and fill. I consider this outcome to be preferable from a landscape perspective, given it reduces the adverse landscape effects associated with the extent of cut and fill that would be required otherwise. However, I do not support the southern section of this road from Valley Views Road to Turitea Road. This is because it is proposed to be routed through the natural wetland.

F. GULLY 9 ROAD CROSSING

I understand Submitter PNIRD (S 45) also proposes an alternative road crossing for Gully 9, to enable roading access to be delivered without crossing into another landowner's property. Again, I have reviewed the plan provided by Resonant dated 01 February 2024, which shows the latest proposed alignment.

- [17] Dr Forbes states in his ecological Supplementary Statement that:¹

One of the proposed links would cross Gully 9 near the gully's upper extent. In this location there are few ecological sensitivities. The proposed crossing point as drawn avoids direct effects to intermittent stream habitat as the location contains only an ephemeral waterway.

¹ Supplementary Statement of Dr Adam Forbes (11 March 2024), at [18].

[18] I am of the view that the gully crossing is appropriate in this location. It should be accompanied with a road crossing design that mimics the dip in landform as the road crosses the gully, plus minimal footprint (as much as engineering standards allow).

[19] In my view, the crossing will have a less than minor effect on landscape values.

G. LANDSCAPE & NATURAL CHARACTER VALUES - CONSERVATION AND AMENITY ZONE

Landscape Values

[23] Work within the gullies are subject to a number of operative and proposed objectives, policies and Assessment Criteria in Sections 7, 7A and 15 of the Plan. These provisions are designed to protect the gullies from adverse effects associated with earthworks, development, and stormwater.

[24] I understand through discussions with Ms Copplestone, and my review of the updated provisions, that the policy framework and Assessment Criteria have been further amended to give greater recognition to character, landscape, amenity and cultural values. In my view, the policies and assessment criteria are appropriate to address the effects of works which may occur in the gullies.

Natural Character

[25] It is my opinion that, over time, there will be a moderate improvement in natural character within the gullies, as a result of the proposed Stormwater Management Strategy and active ecological management of the gully reserves. This includes the proposed PGC controls specifying thresholds for impervious surfaces on-site, construction of the perimeter swale on gully edges to prevent direct discharge of stormwater over the gully edges, and detainment of stormwater in ponds on the plateaus. Given the geological make-up of the soils, erosion in these gullies is on-going, regardless of development.² I understand this erosion would continue if these streams were left untouched,³ so the proposed mitigation, which prioritises avoidance and

² See s 42A Report – Stormwater (15 September 2023) at paragraph 45.

³ See s 42A Report – Stormwater (15 September 2023) at paragraph 48.

nature-based solutions,⁴ will not only address these effects, but also provide for an improvement.

[26] Taking the gullies into public ownership and actively managing these areas to stabilise the gully sides and halt erosion - through planting native forest species and pest and weed management, will assist the natural process of succession to native riparian forest. While that process will take time, I understand, based on the reporting of Dr Forbes, that these areas would once have supported diverse and highly valuable biological communities, and with active management, have potential to reattain similar levels of biodiversity and ecological integrity to what they once had. I understand the benefits of re-establishing this forest will include shading, overhead cover, and reinstatement of habitat, and that this will benefit the health of the gully streams⁵.

[26] Therefore, I expect the result to be a moderate improvement in natural character of the stream margins in the gully reserves.

[27] I note that planting for riparian and ecological offsetting and mitigation also contributes to and enhances natural character. While the subject of future resource consent processes, any mitigation and/or offsetting associated with necessary stormwater management in the gullies will increase the naturalness of the stream corridors, further assisting with restoration and rehabilitation of the naturalness of wetlands, waterways, and their margins.

11 March 2024

John Hudson

⁴ See s 42A Report – Stormwater (15 September 2023) at paragraph 54.

⁵ See s 42A Report – Ecology (15 September 2023) at paragraphs 32-33.