

BEFORE THE HEARINGS PANEL

Under: the Resource Management Act 1991

In the Matter of: the application by Soul Friends Pet
Cremations (Applicant) to the Palmerston
North City Council for resource consents

STATEMENT OF EVIDENCE BY

Chelsea Lee Kershaw

28 September 2021

INTRODUCTION

1. My full name is Chelsea Lee Kershaw. I hold the qualifications of Bachelor of Architectural Studies, Master of Landscape Architecture (with distinction) and Post Graduate Diploma of Environmental Studies, each from Te Herenga Waka (Victoria University of Wellington).
2. I am employed as 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 in the process of becoming a registered member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects (“NZILA”).
3. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and that I agree to comply with it. 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 except where I state I am relying on information provided by another party, the content of this evidence is within my area of expertise.
4. I have been engaged by Palmerston North City Council to provide expert evidence regarding the landscape and visual effects of the proposed pet crematorium, as assessed in my landscape report attached to the s 42A report. I have reviewed the Application for Resource Consent and the material relating to the landscape and visual effects, including the AEE and the Landscape and Visual Assessment¹ (“LVA”).

SUMMARY OF CONCLUSION

5. Council recognises that *“crematoria have the potential to adversely affect the amenity values of both adjoining and adjacent properties.”*² I conclude that landscape and visual effects are no more than minor, by virtue of the location, scale, design, colour and form of the new structures, and the proposed planting. In my opinion the proposal meets the objective of maintaining the quality and character of the rural environment and the policy of controlling the adverse visual effects on the rural environment.³

¹ prepared by WSP, dated 18 December 2020.

² PNDP Section 13 (Airport zone).

³ PNDP Section 9 (Rural Zone): Objective 3 and Policy 3.3.

METHODOLOGY

6. The landscape methodology used for the assessment follows the concepts and principles outlined in the NZILA Guidelines.⁴
7. Due to COVID-19 restrictions a site visit was unable to be undertaken at the time of assessment. However, co-author of the landscape assessment John Hudson, and myself, are familiar with the area. A digital site visit was completed using Google Earth, including appraisal of Google Street View to gain an appreciation of the broader context and localised area of the site.
8. Statutory documents were reviewed to help frame the landscape assessment.⁵ Under the PNDP Section 9 (Rural Zone), Objective 3 directs the maintenance and enhancement of the quality and natural character of the rural environment, supported by Policy 3.3. Under the RMA, consideration must be given to potential effects of the proposal on Section 6(b) outstanding natural features and landscapes (“ONLF”), Section 7(c) maintenance and enhancement of amenity values, and Section 7(f) maintenance and enhancement of the quality of the environment.
9. Consideration was also given to measures to avoid, remedy, and mitigate potential adverse effects, and these are included in the assessment ratings. The assessment used a seven-point scale to rate effects, which can be converted to RMA terminology as per NZILA guidelines⁶, see
10. [Table 1](#).

Table 1: Effects Rating.

very low	low	low-mod	moderate	mod-high	high	very high
less than minor	minor	more than minor	significant			

11. Noise effects were not considered in the landscape assessment. I defer to Mr Lloyd for the assessment of acoustic amenity effects.

⁴ Te Tangi a Te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (April 2021).

⁵ Resource Management Act 1991 (“RMA”), Manawatu-Wanganui Regional Council’s (Horizon’s) One Plan Operative Regional Policy Statement (“RPS”), and the Operative Palmerston North District Plan (“PNDP”).

⁶ Te Tangi a Te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (April 2021).

ASSESSMENT OF EFFECTS

12. The assessment of the planning provisions and the existing environment⁷, outlined in my Landscape Assessment⁸, identified that consideration must be given to the effects of the proposal on the area's landscape characteristics (i.e., ruralness and visual appreciation)⁹.

This includes:

- The landscape effects of landform modification.
- Compatibility of the activity with surrounding landuse.
- Extent to which the built form integrates with the landscape character, and the suitability of the proposed planting.
- Ability to appreciate vistas of the Tararua and Ruahine Ranges, and the Manawatū Gorge (Te Āpiti) which is a recognised ONFL¹⁰.

Landform Modification

13. The landform is already characteristically flat, separated from the nearby waterway by a stopbank. Additional flattening of the river terrace will be indiscernible, such that the terrain will be inconsequently changed. I consider this to be a **very-low** effect.

Compatibility of Activity

14. The proposal is a commercial land use activity being introduced in a rural zone, at the interface with both the industrial and residential zone. Given the proximity to commercial/industrial activities of a similar nature (e.g., Abattoir, Plant Nurseries, and the Ashhurst Transfer Station), the activity is not uncharacteristic of the surrounding landscape. The surrounding open space, because of rural zoning to the east, north, and west, ensures the landscape generally has the capacity to accommodate the proposed activity. Given these considerations, the activity will result in an indiscernible change in landuse. This is considered a **very-low** effect.

15. Due to the potential for negative connotations with a crematorium,¹¹ friction may arise between the proposed activity and residential landuse near the site. To avoid adverse effects of the crematorium on residential sensibilities, the crematorium building is located at the rear of the site, setback at least 190m from residential properties to the south.

⁷ characterised at two scales: the 'broader context' and the 'localised area'.

⁸ Hudson Associates (2021) *Landscape Assessment: Soul Friends Pet Crematorium*

⁹ PNDP Section 9 (Rural Zone): Objective 3 and Policy 3.3, and Objective 7.

¹⁰ PNDP Section 9 (Rural Zone): Objective 7.

¹¹ See submissions i.e., Ms Shannon.

Open space is proposed on-site, and the existing shelter belt trees are retained, providing a buffer between these potentially conflicting activities. This will reduce the visual amenity effects of the proposal during construction, and while the mitigation planting is being established. Given these considerations, the proposed commercial activity will be unobtrusive on residential landuse, but with stacks still remaining visible. I consider this to have an overall **low** effect. I allow that visual effects may be up to **low-moderate** in instances of heightened sensitivity.

Integration of Built Form

16. The scale and form of the proposed building is generally in-keeping with the rural context. Surrounding the site, the landscape displays a rural aesthetic. Structures are typically utilitarian, such as farms sheds, fencing, and powerlines amongst pervasive vegetation. The proposal building is a TotalSpan shed which is a built form anticipated in the rural zone. The proposed screening planting around the building will further integrate the built form into the broader and local rural environment. Over time the mitigation planting will visually blend with the bulk of the built form and enhance the sense of enclosure which is characteristic of this area. Additional mitigation measures reduce the dominance of the structure by using recessive colours with low reflectivity.

17. The visual dominance of four cremator stacks¹² will be less effectively mitigated, compared with the rest of the structures. An adverse visual effect arises due to the protrusion of the cremator stacks and smoke plumes above the mitigation planting, as perceived by some nearby residents. I am in support of the use of dark colours (i.e., Resene Karaka or Resene Flaxpod), with low reflectivity, which will generally minimise the bulk of the structures. Where the cremator stacks are backed by vegetation or terrain, these will blend into the landscape. In addition, tall and thin vertical elements are not uncharacteristic within the broad and localised context. As a result, this modification is limited to a **low** effect.

Landscape Appreciation

18. The application site is located so that from certain eastward facing viewpoints, the Tararua and Ruahine Ranges and Te Āpiti are seen as a backdrop to the site. Mitigation

¹² Soul Friends Management Plan states cremator stacks are 10.5 – 13m high. This is up to 4m higher than the 9m height often permitted in the rural zone. See R9.5.5 in the PNDP.

measures have been included in the proposal, i.e., planting and colour palettes, to blend structures into the surrounding landscape and minimise the prominence of the built forms. I agree with the applicant's Landscape Assessment, that the stacks will be seen below the ridgeline of the ranges and views of Te Āpiti will remain intact. Effects of any visible stacks will be mitigated by the dark and recessive colouring which will blend with the hillsides. I therefore consider the effect on appreciation of the ranges to be **very-low**.

EFFECTS SUMMARY

19. The proposal would cause very-low adverse effects to the landforms, vegetation, landuse, built forms, and general visual appreciations which are characteristic of the broader context. These adverse effects translate to less than minor in RMA terminology.

20. The greatest adverse landscape effects arise from the protrusion of the cremator stacks and smoke plumes above the mitigation planting, perceived by local viewers. These effects are limited due to the contained nature of the landscape causing limited visibility of the proposal, the mitigation measures which enhance the sense of containment and further limit visibility, the distance setback from roads and residential properties, and the open space buffers. These low to low-moderate effects translate to minor in RMA terminology.

CONCLUSION

21. The design measures provided in the proposal adequately control adverse landscape and visual effects. These measures include:
 - The form of structures (roof shape and pitch which has been designed to be in character with the rural landscape).
 - The scale of structures (compact footprint to allow retention of open space).
 - Screen planting (intended to blend the structures into the landscape).
 - Materiality (use of low reflective, dark green or black colour finishes intended to minimise the prominence of built forms).

22. As a result of these measures, effects are assessed as no more than minor after implementation of the mitigation measures proposed.

Chelsea Kershaw

28 September 2021