BEFORE THE GREATER WELLINGTON REGIONAL COUNCIL AND HUTT CITY COUNCIL

EASTERN BAYS SHARED PATH PROJECT

Under	the Resource Management Act 1991
In the matter	of applications for resource consents by Hutt City Council under section 88 of the Act, to carry out the Eastern Bays Shared Path Project

STATEMENT OF EVIDENCE OF JULIA ANNE WILLIAMS (LANDSCAPE AND VISUAL EFFECTS) ON BEHALF OF THE APPLICANT

30 November 2020

BUDDLEFINDLAY
Barristers and Solicitors
Wellington

Solicitors Acting: **David Allen / Libby Cowper / Esther Bennett**
Email: david.allen@buddlefindlay.com / libby.cowper@buddlefindlay.com / esther.bennett@buddlefindlay.com
Tel 64-4-499 4242 Fax 64-4-499 4141 PO Box 2694 DX SP20201 Wellington 6140

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QUALIFICATIONS AND EXPERIENCE

1. My full name is **Julia Anne Williams**. I am a director at Drakeford Williams Ltd, Landscape Architects.

2. My evidence is given on behalf of Hutt City Council ("**HCC**") in relation to its applications under section 88 of the Resource Management Act 1991 ("**RMA**") for resource consents for the Eastern Bays Shared Path Project ("**Project**").

3. I have the following qualifications and experience relevant to the evidence I shall give:

   (a) I hold a Bachelor of Architecture degree (University of Auckland), a Postgraduate Diploma in Landscape Architecture (Lincoln College) and an Advanced Certificate in Tertiary Teaching (Wellington Polytechnic). I am a current certificate holder in the 'Making Good Decisions' Programme for RMA decision-makers.

   (b) I have over 35 years of experience as a landscape architect in design, assessment and landscape development projects. In my professional capacity I have been involved in a number of landscape assessments, site planning, and landscape management and strategy reports. I have prepared and presented landscape expert witness evidence at planning hearings, the Environment Court and Boards of Inquiry on behalf of applicants and in a section 42A capacity for councils.

   (c) Of particular relevance to this proposal, I have assessed effects for a proposed revetment structure on the natural coastal character of the Breaker Bay coastal marine area and on public open space and visual amenity for views within, to and from the coastal marine area. I reviewed a landscape and natural character assessment for Ministry for the Environment for proposed Marine Farm Sites in the Marlborough Sounds. I have also provided section 42A advice on projects in areas with high amenity and landscape character values including the proposed replacement Mangaweka Bridge, the Prince of Wales Reservoir in the Wellington Town Belt and Waverley Wind Farm on the South Taranaki coast.

   (d) I am a Fellow of the New Zealand Institute of Landscape Architects ("**NZILA**") where I hold current professional registration.

4. I have read the Code of Conduct for expert witnesses in the Environment Court Practice Note 2014 and I have complied with it when preparing this evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

BACKGROUND AND ROLE

5. In preparing my evidence I have:

   (a) undertaken a number of site visits over 2016 to 2019 for field work and to establish locations for visual simulations;

   (b) taken part in expert meetings and workshops;

   (c) reviewed proposal options; and

   (d) reviewed on-going design changes with regard to beach nourishment and safety structures.

6. I prepared the technical report *Landscape and Visual Assessment* dated 7 February 2019 in Appendix D to the Assessment of Effects on the Environment Report ("**AEE**") and Appendix 5 Supplementary Report to Landscape and Visual Assessment dated October 2019.

7. I was involved in the briefing and review of the visual simulations in Appendix O *Visualisations* to the AEE Report, which were undertaken by Stephen Drakeford, a director of Drakeford Williams Ltd.

8. I provided feedback on the bio-mitigation options provided by Eos Ecology and described in the Appendix A-1 *Intertidal Ecology* report.

9. My evidence draws upon a series of technical reports prepared for HCC, Greater Wellington Regional Council ("**GWRC**") and the Great Harbour Way Coalition. These include:

   (a) Boffa Miskell Limited 2009. *The Great Harbour Way - Te Aranui o Poneke Issues and Opportunities Analysis.* Report prepared by Boffa Miskell Limited for the Great Harbour Way Coalition;

(b) Boffa Miskell Limited 2016. *Wellington City and Hutt City Coastal Study: Natural Character Evaluation of the Wellington City and Hutt City Coastal Environment*. Report prepared by Boffa Miskell Limited for Greater Wellington Regional Council, Wellington City Council and Hutt City Council;

(c) Boffa Miskell Limited 2016. Hutt City Landscape Evaluation: Draft Technical Assessment. Report prepared by Boffa Miskell Limited for Hutt City Council; and

(d) Hutt City Council 1998. *Eastern Bays Marine Drive Design Guide.* Report prepared by Graeme McIndoe for Hutt City Council.

10. In conjunction with other technical experts and community representatives, I participated in three workshops over May - July 2017. These included:

(a) Workshop 1 where we discussed a design philosophy and mitigation for the preliminary design of the two options (2.5m and 3.5m path width) including sub-options of different wall types;

(b) Workshop 2 where we scored nine structure options (for beach and non-beach sections) by criteria to identify preferred wall types; and

(c) Workshop 3 where we collectively agreed on the placement of the preferred wall types for the full project extent for both the 2.5m and 3.5m path width options and the design rationale.

11. In September 2019, I participated in the consideration of a range of safety barriers for the coastal edge of the proposed new shared path ("**Shared Path**") with a focus on suitable railing options to meet the requirements of the Building Code and take account of the exposed coastal location.

SCOPE OF EVIDENCE

12. The purpose of my evidence is to describe and address the landscape, visual and natural character effects of the Project.

13. My evidence addresses:

(a) the methodology I used in assessing landscape, visual and natural character effects;

(b) the existing environment of the Project area as relevant to my evidence;

(c) the landscape, visual and natural character effects of the Project;

(d) steps taken to address potential adverse landscape, visual and natural character effects, including through the selection of the coastal edge option and with particular reference to the Landscape and Urban Design Plan ("**LUDP**") and Bay Specific Urban Design Plans ("**BSUDP**") required by the conditions;

(e) conclusions on effects taking into account the recommended mitigation; and

(f) responses to submissions and the section 42A reports.

EXECUTIVE SUMMARY

14. The Project includes Point Howard, Sorrento Bay, Lowry Bay, York Bay, Mahina Bay, Sunshine Bay and Windy Point, and is located in the Eastern Bays. The Project site essentially is a strip of land on the seaward side of Marine Drive that is 4.4km long and between 3.5m and 11m wide, with additional 10m bands of beach nourishment sand at Point Howard, Lowry Bay and York Bay.

15. The Eastern Bays have a distinctive landscape setting on the edge of Te Whanganui-a-Tara / Wellington Harbour. Given the coherence and naturalness of the wider landscape setting with the beech forest hill backdrop, the harbour foreground and the drama of the interaction of road and water, and in spite of the highly modified coastal edge, it is my opinion that the Project site's natural character (experiential) values are *Moderate*.

16. Considered over the length of the Eastern Bays, there is a small loss of local landform and the overall adverse biophysical effects are *Low*.

17. While it is an important component of the Eastern Bays landscape, the narrow fringe of land between the road and the water has a low visual prominence. Adverse effects of the proposal on natural character are considered to be *Low* for the wider Eastern Bays coastal landscape.

18. Adverse natural character effects on the coastal side of the Shared Path at a site-specific scale will be *Moderate - Low* but reduce to *Low* or *Very Low* as the structures weather and become more familiar elements in the local landscape.

19. In contrast the inland side of the Shared Path will become decidedly urban, although the new Shared Path will enable a wider range of people to experience the coast and access the foreshore.

20. The long term adverse effects on visual amenity across the Eastern Bays are considered *Low* to *Very Low*.

21. Effects at a local scale and on a bay-by-bay basis will be determined by the detailed design delivered through the LUDP and BSUDPs. These plans have the potential to provide benefits for the community through design that reinforces the individual character and local identity of each bay, as well as visual and recreational amenity. Visual effects have the potential to be adverse *Very Low* or may even be considered beneficial.

22. The visual impact of construction will be localised and short term. Adverse construction effects are considered to be *Very Low*.

23. Submitters have raised concerns with the inclusion of safety barriers (or railings) into the Shared Path design, and the section 42A reports discuss the lack of certainty on their inclusion in advance of the LUDP and BSUDP processes. My opinion is that safety barriers will create only a small increase in adverse effects on natural character and visual amenity in those areas where they are located. Where railings are required, they will be integrated into the Shared Path layout through the more detailed design. Overall, adverse effects on natural character in bays where safety barriers will be installed will be *Moderate - Low.*

24. The Project is a compromise between providing a resilient structure to respond to climate change and providing for safe cycling and pedestrian usage while minimising the effects on the coastal environment and the amenity of local residents and visitors to the Eastern Bays. In this regard, the proposed LUDP and BSUDPs are seen as the primary tools to ensure acceptable outcomes are achieved in respect of visual and experiential natural character effects.

25. Provided that the design plans are prepared and implemented as set out in the proposed conditions of consent LV1-7,[1] the adverse landscape and visual effects of proposal will be no more than *Moderate -Low*, which is no more than minor.

[1] As appended to the evidence of **Caroline van Halderen**.

26. In my opinion, the Shared Path and seawall structure is an appropriate development in this location and the proposed conditions of consent appended to **Ms van Halderen's** evidence will ensure a satisfactory level of landscape and visual effects.

METHODOLOGY

27. A seven-point scale is recommended in the NZILA best practice note[2]. This scale was used for the Eastern Bays landscape and visual assessment, with *'Moderate --Low'* considered being equivalent to *'minor'* effects in RMA terminology. This is illustrated in Figure 1 below.

Very Low	**Low**	**Moderate - Low**	**Moderate**	**Moderate - High**	**High**	**Very High**

Figure 1: Assessment scale

28. The assessment of effects on natural character evaluates experiential attributes including: legibility (geomorphology); legibility (way-finding and orientation); visibility (public and private views); picturesqueness; coherence (heavily influenced by visual perception); and other experiential attributes such as sounds, smell of the sea and their context or setting.

29. Criteria for effects on visual amenity included: the visual impact of the structure with a preference for views of natural foreshore rather than built structures; changes to views of/closeness to (versus separation from) the water's edge; the visual dominance of structure with regard to dominant versus recessive colour and geometric/manmade versus organic form; and visual consistency with a preference for elements and structures that are consistent with or similar to existing elements and structures.

EXISTING ENVIRONMENT

Landscape Context

Wider setting

30. The cluster of bays known collectively as the Eastern Bays have a distinctive landscape setting on the edge of Te Whanganui-a-Tara / Wellington Harbour. While it is an important component of the Eastern Bays landscape, the coastal edge has a low visual prominence and its natural character has been modified over time by road widening and retaining structures.

[2] NZILA: 6.0 Practice Support Documentation. Best Practice Guide - Landscape Assessment and Sustainable Management. Index Number: 10.1.

31. The bays are backdropped by the Eastbourne Hills, identified[3] as a special amenity landscape ("**SAL**") largely because of the distinctive landscape setting provided by the hill landform, the indigenous beech forest cover, and the absence of roads, structures, and introduced vegetation. However, no SALs, outstanding natural landscapes ("**ONL**") or outstanding natural features ("**ONF**") are currently identified in the Regional Coastal Plan for the Wellington Region ("**RCP**") nor the decisions version of the Proposed Natural Resources Plan ("**PNRP**"), and the 2016 draft technical assessment did not identify any ONFs, ONLs or SALs within the Project area.[4]

32. Marine Drive is the main access to the Eastern Bays. The road is contained on a narrow strip of flat land between residential development on the lower hill slopes and the harbour. As the Eastern Bays population has grown, the road has been progressively upgraded and widened by extending it out over the rocky outcrops and foreshore, and extending it inland by cutting into the escarpment and headlands.

Bay-by-bay

33. The Project includes Point Howard, Sorrento Bay, Lowry Bay, York Bay, Mahina Bay, Sunshine Bay and Windy Point. These are described in my technical report *Landscape and Visual Assessment* (Appendix D to the AEE) at 3.3 and 3.4, and in greater detail in 12.1.

34. Each bay has a narrow, moderately steep beach, a rocky foreshore and rock outcrops extending out into the harbour. Each bay has its own community of interest and a unique landscape identity arising from the curvature of the bay, its orientation and exposure to the prevailing winds, the steepness of the local hills, proximity to the coastline and the pattern of residential settlement.

The site

35. The Project site essentially is a strip of land on the seaward side of Marine Drive that is 4.4km long and 3.5m to 11m wide, with additional 10m bands of beach nourishment sand at Point Howard, Lowry Bay and York Bay. In more recent times, there have been limited opportunities to extend inland into established residential development and the road has been widened into the foreshore. Consequently, the carriageway is edged by a variable width footpath (or no path at all) then modified or repaired with a range of seawalls, retaining structures and revetments. These seawalls and revetments are an ad hoc mixture of various structures. Some have been constructed on an as-needed basis following loss of structural integrity or washouts. Others, such as the curved seawall at the south end of York Bay, are more recent

[3] Boffa Miskell Limited 2016. Hutt City Landscape Evaluation: Draft Technical Assessment. Report prepared by Boffa Miskell Ltd.
[4] Ibid.

constructions designed for longevity and resilience to extreme weather events.

36. From a landscape and visual perspective, the existing road edge is distinctly makeshift. Seawall construction on an ad hoc basis has created 'untidy and abrupt juxtapositions';[5] there are numerous pipes and drains protruding into the water and remnants of old infrastructure such as service boxes and concrete foundations at the base of the walls. Over time the coastal edge has become encrusted with an accumulation of poorly detailed rough and ready repairs, many using materials that are inappropriate to the local coastal landscape.

37. There is little at-grade access to most beaches and the edge is interrupted by steps and boat ramps, as well as bus shelters and boat sheds, and the remnants of older structures and infrastructure. Coastal vegetation is sparse other than pohutukawa trees that have been planted at headlands and rocky outcrops, small areas of council plantings at the larger headlands and colonising plants such as taupata that establish in small rock crevices and wax and wane according to water levels.

Existing Natural Character

38. Existing natural character of the wider Eastern Bays has been assessed at a wider scale as having moderate abiotic, biotic and experiential natural character.[6] In terms of the Project site and its immediate coastal context, evaluation of biotic and abiotic natural character is outside my area of expertise. My assessment focussed on experiential natural character, which can be described as how people see or experience the coastal environment and includes aesthetics, sounds, a sense of wildness, isolation, and the impact of human activity.

39. At a local scale, the perceived natural character of the narrow fringe of land between the road and the water varies depending on where it is viewed from. In views from the road and from Eastern Bays' houses, the seawall structures have a low visual prominence. The coastal edge appears informal and picturesque, evocative of small beach settlements around New Zealand. Viewed from the footpath, beach and water, the seawall structures at the interface of the road and foreshore are highly visible, and the coastal edge is unsightly rather than picturesque.

40. On balance, given the coherence and naturalness of the wider landscape setting, the beech clad Eastbourne Hills, the harbour foreground and the drama of the interaction of road and water, and in spite of the highly modified

[5] 3.1 Seawall. Eastern Bays Marine Drive Design Guide: RAS-GDL-003 http://iportal.huttcity.govt.nz/Record/ReadOnly?Tab=3&Uri=3685680.
[6] Boffa Miskell Ltd 2016. *Wellington City and Hutt City Coastal Study: Natural character Evaluation of the Wellington City and Hutt City Coastal Environment.* Report prepared by Boffa Miskell Ltd for Greater Wellington Regional Council, Wellington City and Hutt City Council.

coastal edge, it is my opinion that the Project site's natural character (experiential) values are *Moderate*.

LANDSCAPE, VISUAL AND NATURAL CHARACTER EFFECTS OF THE PROJECT

Biophysical Effects

41. Biophysical effects relate to changes to landform, vegetation cover and waterways. Assessment looks at the impact of the Project on changes to landform and the encroachment of the proposed seawall onto the foreshore, given that there is little vegetation to be disturbed and all natural waterways have been channelled under the road to the sea.

42. Considered over the length of the Eastern Bays, there is a small loss of local landform and the overall adverse biophysical effects are *Low*.

43. Encroachment into the rocky foreshore and over the beach varies from bay to bay. At a local scale, adverse effects are considered *Low* with the following exceptions:

    (a) Point Howard north of the beach, where effects are *Moderate*;

    (b) Point Howard, Lowry Bay and York Bay beaches, where effects are *Moderate - Low* providing that beach nourishment uses local material of a similar colour and texture; and

    (c) Sunshine Bay, where the proposed revetment has no relationship to the landform scale and context and effects are *Moderate*.

Effects on Natural Character

44. While it is an important component of the Eastern Bays landscape, the narrow fringe of land between the road and the water has a low visual prominence. Overall adverse effects of the Project on natural character are considered to be *Low* for the wider Eastern Bays coastal landscape.

45. At a more local level, the existing current coastal edge is variable with a range of seawall and retention structures. Viewed at close quarters, much of the built structure is unattractive but has weathered into the site and now is a familiar element of the coastal landscape. The Shared Path will extend built works into the coastal area with the concrete edge and seawall creating a strong differentiation between the natural environment and the urban environment.

46. The impact of the Project on the natural character on the coastal side of the Shared Path will depend largely on the final detailing and texture on the curved seawall faces, the material used for beach nourishment, the design response to the local landform where the walls finish at rocky outcrops, and

design treatments in the more exposed, untamed areas outside the beaches. The visual impact of a consistent coastal edge, even the high impact 'unnatural' line of the curved concrete wall, will become less eye-catching over time as the seawalls and steps/ramps become established and familiar features. Likewise, the rock revetments, which are perceived by many as more 'natural' than concrete, will weather and provide habitat for self-sown plants. In other words, the visual impact of the works will diminish over time. Adverse experiential effects on natural character on a bay-by-bay basis will be *Moderate - Low* but reduce to *Low* or *Very Low* in time.

47. The inland side of the Shared Path will be decidedly urban, although walkers and cyclists now will have unobstructed views of the harbour and the opportunity to experience the wild coastal landscape with its changing sea and weather conditions. The final detailed designs will be decided in the LUDP and BSUDPs (included in proposed conditions LV1–7) and undertaken in consultation with each bay community. The BSUDPs will include localised structures such as bus shelters, street furniture and signs, and places such as stop-and-rest areas. These features will provide benefits for the community through design that reinforces the individual character and local identity of each bay, as well as providing visual and recreational amenity.

Effects on Visual Amenity

48. The visual impact of the Project is most pronounced in views from the beach and water, where the revetments and seawall structures will be seen in elevation. Generally, the Shared Path itself will be the most visible component of the Project when viewed from local dwellings and from the road.

Residents

49. The widened Shared Path will increase the scale of the road corridor but it is a small part of the panoramic views the residents have to the west over the harbour. At a broad scale, the visual effects of the proposal are *Very Low*. At a local scale, and provided the design principles outlined in the *Design Features Report*[7] are adhered to, effects on residential visual amenity are considered to be *Low*.

Drivers

50. The existing experience of driving along on the land/water interface will be changed by the widened road corridor and increased separation from the water's edge, with the kerb blocks creating a low but not insignificant barrier. Overall, the Project will create a more formal Marine Drive road corridor. However, over the Eastern Bays hills, the visual complexity of the bay and

[7] Appendix J Design Features Report https://www.gw.govt.nz/EasternBaysSharedPath-Appdocs/.

headland coastline, and the wider harbour landscape, continue to dominate views from the car. Adverse effects on visual amenity for Eastern Bay drivers are *Very Low*.

Pedestrians and cyclists

51. The Shared Path will look different and provide a different user experience by changing the scale of the road corridor and creating a coastal edge that is more formal but with less visual clutter. Effects on visual amenity across the wider Eastern Bays route are generally considered to be *positive*.

52. At a bay scale, there will be changes along the route with familiar features removed or replaced and a potential loss in local identity. Effects arising from the visual dominance of the path structure can be reduced by the integration of Shared Path signage and path markings, bus shelters and street furniture into the Shared Path. Provided these features are located carefully to avoid visual clutter and maintain views down to the water's edge, adverse visual effects have the potential to be *Low*, and in some locations, where unsightly seawalls and infrastructure are removed, effects will be *positive*.

Beach users

53. Although the Shared Path will create a more formal coastal edge, there are beneficial effects on visual amenity arising from the removal of the existing clutter of structures and infrastructure, as well as their replacement with a cohesive and integrated coastal edge. Some residents may regard the curved concrete wall as visually obtrusive but over time the replacement walls, steps, ramps and revetments will weather and become established elements in the beach landscape.

54. Provided beach nourishment is undertaken using locally sourced material, it is my opinion that adverse visual effects arising from the Shared Path will be *Moderate - Low* but will decrease over time to *Very Low* as the seawalls, steps and ramps weather. The final visual effects depend to some extent on the viewer and I note that some residents may regard the changes as *positive.*

Views from the water

55. The proposed concrete seawalls and rock revetments are familiar elements in the wider harbour landscape and around the Eastern Bays. The visual impact of the new structures will decrease over time as the seawalls age and weather. Given the expected viewing distances, adverse effects on visual amenity are *Very Low*.

Overall

56. The coastal edge of Marine Drive will be replaced by the Shared Path and its associated built components. The seaward side of the road will look different and provide a different user experience with local nuance and character replaced with a wider path and a more consistent and formalised, hard coastal edge. At the same time, the new path will enable a wider range of people to access and have views from the coastal edge. Overall, the long term adverse effects on visual amenity are considered to be *Low* to *Very Low*.

57. Effects at a local scale and on a bay-by-bay basis will be determined by the detailed design but have the potential to be adverse *Very Low* or may even be considered *positive*.

Construction Effects

58. Construction will involve the demolition of existing seawall structures and excavation using machinery that will largely be operated from the road verge. During construction, views towards the coastal edge from the street will be screened by machinery (although residents in elevated locations will retain their views of the hills across the harbour) and views from the foreshore and water towards the road edge will be obscured by construction works. However, the visual impact of construction will be localised and temporary, with each bay expected to take 3-6 months to complete. Overall, therefore, adverse effects are short term and considered to be *Very Low*.

Safety Barriers

59. The requirement, in some bays, of a safety barrier at the coastal edge of the Shared Path, such as the fence and railing illustrated in *Figure 2* of the Supplementary Report to the Landscape and Visual Assessment 8 ("**Supplementary Report**"), arose from a traffic safety audit undertaken after the Project had been publicly notified. The barriers will be located in four sites along the route, in areas where there is a drop from the pathway to the shore that exceeds one metre.

60. The Supplementary Report explains that the use of safety barriers corresponds to the risk profile of the drop-off. Where the drop-off is less than one metre, a "wheel guard" is required (which I have assessed has having *Low* visual impact when seen within the wider landscape and road corridor setting); and no edge restraint is required where there is a negligible drop-off.

61. An example of railings is shown in *Figure 2* of the Supplementary Report. This example is designed to be visually non-intrusive, but it introduces an urban element into the coastal environment. This is acceptable along Windy

[8] FI-33 Appendix 5 Supplementary Report to the Landscape and Visual Assessment https://www.gw.govt.nz/EasternBaysSharedPath-FurtherInfo/.

Point, where the barrier will be located opposite urban form residential development but is less consistent and cohesive in the Lowry Bay, York Bay and Sunshine Bay sites where the railings will be located close to headlands, away from the more developed beach settlements.

62. Despite this, it is my opinion that the inclusion of railings into the Shared Path design would create only a small increase in adverse effects on natural character in those areas where they are located. The railings will be perceived as part of the inland shared path streetscape rather than an element in the seaside coastal landscape.

63. Effects on visual amenity occur largely in the vicinity of the safety barriers. For drivers, the barrier will obscure immediate views of the sea. Given the length of the barrier and the wider panoramic views, effects are *Moderate - Low* for Windy Point and *Low* for York Bay, Mahina Bay and Sunshine Bay. For residents of the six properties that look across to the railings, the safety barrier will partially screen direct views of the coastal edge and harbour. Generally, living areas in these properties are located above street level to maintain privacy and maximise views to the west. Depending on the layout of the house, effects may be *Moderate - Low*.

64. Where safety barriers such as railings are required for safe cycling and pedestrian usage, they will be integrated into the Shared Path layout through the more detailed design required as part of the LUDP and BSUDPs. More specifically, potential loss of visual amenity for residents of properties at 2 Gill Road, 502 Marine Drive and 628, 727, 729 and 731 Marine Drive should be addressed through the relevant BSUDP.

65. Overall, adverse effects on natural character are considered to be *Low* for the wider Eastern Bays coastal landscape. Adverse effects in bays where safety barriers will be installed will be *Moderate - Low.*

66. Adverse effects on visual amenity are *Moderate - Low* in the vicinity of the safety barriers.

STEPS TAKEN TO ADDRESS POTENTIAL ADVERSE EFFECTS

Design across the Project

67. Design Workshops held in 2017 established the preferred seawall and revetment types and their location. From a landscape perspective, the curved seawall was the preferred option because it repeated an existing structure, could be formed to follow/reflect the curve of the bay landform, and placed the edge of the Shared Path close to the water. A collective decision was made that a revetment would not be appropriate at beach locations due to its encroachment into the foreshore. In the event it was necessary, a rock revetment was preferred over concrete blocks (for example) as it was

perceived as using a material with the feel of the local rock. This is addressed in detail in **Jamie Povall's** project design evidence.

68. The *Design Features and Construction Methodology* technical report (Appendix J to the AEE) sets out design principles and includes a series of typical designs/design features developed as part of the preliminary design. The principles are based on work documented in the 1998 Eastern Bays Design Framework[9] that informs the brief for all Council design work in this area and was prepared in consultation with the Eastern Bay community.

69. All design principles focus on 'good design' outcomes that will reduce adverse effects on natural character and visual amenity. For example, principles include: consistency in the location and design of elements and use of materials; maintaining a focus on the seashore and natural environment; avoidance of visual clutter; and a design that recognises the individual character of each bay.

70. The design features establish basic design features for seawalls, beach access, the shared path, planting and signage with opportunities for fine tuning at the detailed design stage.

71. In my opinion, adverse landscape and visual effects are minimised through the use of familiar materials and consistent path and seawall detailing across the route. This reduces the visual impact of new structures and emphasises the contrast between the inland urban road landscape and the natural environment of the foreshore.

Conditions of consent and the Landscape and Urban Design Plan

72. A proposed condition of consent (appended to **Ms van Halderen's** evidence) is that a LUDP be developed in consultation with HCC, the Eastbourne Community Board, local resident organisations and the Eastern Bays community. The proposed LUDP is seen as the primary measure to ensure acceptable outcomes are achieved in respect of visual and natural character effects. The relevant conditions are set out at *Landscape, Urban Design and Visual (LV)* LV1-7. Each bay is unique in terms of its landscape and community. Concerns about the loss of local landscape and identity will be addressed in consultation with each bay community in a BSUDP.

73. The Project in its current form is a compromise between providing a resilient structure to respond to climate change and providing for safe cycling and pedestrian usage, while minimising the effects on the coastal environment and the amenity of local residents and visitors to the Eastern Bays. Condition LV.6 provides a process for developing the plans with a draft protocol for each bay to determine local priorities. This means, for example,

[9] Eastern Bays Marine Drive Design Guide: RAS-GDL-003 http://iportal.huttcity.govt.nz/Record/ReadOnly?Tab=3&Uri=3685680.

that the very urban Lowry Bay community may decide that seating opportunities, signage and storyboards are important, in contrast to the wilder, less modified Sunshine Bay where the community may focus more on naturalised planting areas and to Windy Point where specific beach access points, safety and shelter on the shared path is important.

Evaluation of measures

74. The design process to this point is not dissimilar to the process used in larger roading projects. I have experience in three motorway projects in the Wellington region where I provided advice to councils on the landscape and visual components of the design pre-hearing and post-approval through to construction.

75. In all cases, a draft Urban and Landscape Design Framework ("**ULDF**") containing overarching and corridor-wide design principles on landscape, earthworks, structure, shared path linkages, road furniture and stormwater etc and indicative landscape concepts for the route formed part of the application, alongside other technical reports. Conditions set out requirements for the more detailed landscape and urban design management plan to be prepared post application. They also listed relevant stakeholders and for specific property owners to be consulted with during the next stage of detailed design.

76. Once the proposal was approved, the ULDF formed the basis for the more detailed management plans and ongoing design documentation. For the 16km long MacKays to Peka Peka Expressway, plans were completed in stages, not necessarily sequential, with the first plan to be approved setting the standard for quality assurance with the generic detailing of major items. While the Eastern Bays Shared Path is only 4.4km long, works will be staged in a similar fashion, ie they will not necessarily be sequential or continuous but the intention is that, for each stage, a bay is completed in its entirety.

77. Although I was a reviewer, and so was not involved in the stakeholder consultation for the roading projects described above, my experience is that the process of undertaking detailed design post proposal changes the focus of consultation from a clashing of community views to a willingness to engage with the process to get the best and most feasible design possible. I have had input into the proposed Landscape, Urban Design and Visual conditions. In my opinion, the conditions provide appropriate constraints to minimise the Project's landscape and visual effects and ensure they will be reduced to an acceptable level.

Additional minimisation arising from Ecological Management

78. There will be considerable spin-off landscape and visual benefits from the proposed ecological management. Measures that restore beaches, replace

habitat and minimise damage to the coastal marine area and seabed create a more natural looking foreshore and coastal edge. The proposed conditions for Ecological Management (EM) set out procedures to avoid and/or minimise effects on intertidal ecology, flora and fauna and coastal processes that will retain or restore experiential natural character.

79. The proposed conditions include: *Little Penguins and Shoreline Foragers* EM.1-6; *Habitat Enhancement Plan* EM.7-9; *Intertidal and subtidal ecology* EM.10-11; *Beach Nourishment Plan* EM.13-14; and *Seawall and revetment habitat* EM.19.

CONCLUSIONS ON EFFECTS

80. Adverse landscape and visual effects are minimised through the use of familiar materials and consistent path and seawall detailing across the route. This reduces the visual impact of new structures and emphasises the contrast between the inland urban road landscape and the natural environment of the foreshore. Over and above the detailed and fine-grained design, adverse effects will continue to reduce as the Shared Path structures, and the seawalls in particular, physically weather and become familiar elements in the bay landscape.

81. Overall, I am satisfied that, provided that the design plans are prepared and implemented as set out in the proposed conditions of consent LV1-7, the adverse landscape and visual effects of proposal will be no more than *Moderate - Low*, which is no more than minor.

RESPONSE TO SUBMISSIONS

82. My response to submissions focusses on issues of natural character, visual amenity and biophysical changes raised by submitters. Issues of detailed design such as the location of bus shelters or the location of replacement steps will be dealt with in bay-by-bay design via BSUDPs and in consultation with the relevant stakeholder groups.

Safety barriers

83. Submitter Ruth Gilbert (163) is neutral on the Project but opposes the use of railing, noting that it is visual pollution and would create a real barrier to the views of sea and the natural environment.

84. I agree that safety barriers are not desirable in wilder areas closer to headlands, where they introduce an urban element into the coastal environment. I also agree with the submitter that the safety barriers (depending on the type of railings) have the potential to screen views to the immediate foreshore for drivers approaching the barrier and for specified residents.

85. It is my opinion that the proposed conditions of consent appended to **Ms van Halderen's** evidence will ensure that the inclusion of railings into the Shared Path design would create only a small increase in adverse effects on natural character and visual amenity across the Eastern Bays, and that adverse effects on natural character and visual amenity will only be *Moderate - Low* where the safety barriers are deemed necessary and installed.

86. Where safety barriers such as railings are required for safe cycling and pedestrian usage, I am satisfied that they will be appropriately integrated into the Shared Path layout through the more detailed design required as part of the LUDP and BSUDPs. As confirmed above, my opinion is that the proposed conditions will ensure that the effects of installing safety barriers will be managed to an acceptable level.

The Atkinson Tree

87. East Harbour Environmental Association Inc (80), Nigel Oxley (84), Roger Brown (162), Richmond Atkinson (168), Carol Lough (173), Morgan Sissons (174) and Margaret Sissons (175) are opposed to the removal of the Atkinson Tree in York Bay. Fiona Christeller (160) and Carol Lough (173) support the Project but argue for retention of the Atkinson Tree.

88. I acknowledge how important the Atkinson Tree is to local residents. The tree, however, is located in the middle of the proposed Shared Path. Nigel Oxley states that some pruning on the tree has already improved the available space and further pruning will mean there is no need to remove the tree. Fiona Christellar suggests narrowing the pathway beside the tree and along the main part of the beach, then widening it as it joins the existing finished pathway at the south end.

89. The path would need to be reduced significantly to less than the 2.5m minimum acceptable width to accommodate the tree, so narrowing the path was not a possibility. **Jamie Povall's** project design evidence addresses the reasons for this. While the option of relocating the tree was investigated, an arborist's report[10] has concluded that the tree is in poor health and is unlikely to survive relocation to another location.

90. The tree is one of a number of specimen pohutukawa trees along the route, although it is unique in its location on the beach rather than on a rocky outcrop above the beach, which may explain its slow growth over twenty five years. All the pohutukawa trees provide shade, habitat and visual amenity, and contribute to local identity and experiential natural character. The removal of trees and vegetation along the Shared Path has been factored into the landscape and visual assessment.

[10] David Spencer, Arborlab Consultancy Services, March 2018.

91. While the loss of the Atkinson Tree is regrettable, particularly because of its local significance, there will be a range of options for planting a replacement tree in a nearby location with more optimal conditions for growth and longevity. These options can be explored through the York Bay Urban Design Plan in conjunction with the relevant resident association and the local bay community. In this way, the legacy of the tree can be acknowledged in an appropriate way to respect its sentimental value.

Trees along the Shared Path

92. Submitter Fabian Beveridge (2) supports the Project but submitted that trees along the route removed for the Shared Path should remain because they provide shade, wind protection and break up the landscape. He requested removed trees are replaced and that additional trees are planted along the route to mitigate the effects.

93. The Shared Path has been located to avoid trees along the coastal edge where possible and has been narrowed where there are trees at locations such as at the north end of York Bay (CH2275), the north end of Mahina Bay (CH3140) and the north end of Sunshine Bay (CH3700). In short, every effort has been made to retain as many trees as possible while providing for safe cycling and pedestrian usage. As I stated above, there will be opportunities for new coastal plantings that will be explored through the LUDP and BSUDP and in conjunction with relevant resident associations.

Shared Path Surface

94. Geoff Rashbrooke (179) opposes the Project. He does not believe the proposed design is attractive and would prefer a boardwalk, in some areas at least, to reduce the monolithic look of the project.

95. The Eastern Bays Marine Drive Design Guide[11] forms part of the Hutt City Design Framework and establishes an agreed and explicit direction for future work by the HCC in the Eastern Bays. It focuses on the design of the coastal edge, specifically the seawall, walkway and associated elements between Port Road and Windy Point. One of the design principles in the Design Guide is to achieve compatibility across the Eastern Bays through general consistency of edge detailing and surfacing. For this reason, it was decided that that path surfacing should be asphalt with concrete edging. In my opinion, the proposed path surfacing will be appropriate in its setting.

[11] Eastern Bays Marine Drive Design Guide: RAS-GDL-003 http://iportal.huttcity.govt.nz/Record/ReadOnly?Tab=3&Uri=3685680.

Offshore structures

96. The East Harbour Environmental Association Incorporated (80), Harvey Calder (200),Janice Heine (128), Sally Bain (158) and Richmond Atkinson (168) suggest that rip-rap rock islands, 'breakwalls', surf breaks or breakwaters and other artificial structures could be constructed offshore from the beaches as an alternative structure to absorb the power of waves instead of the proposed design. **Michael Allis** addresses this in his evidence, noting that these structures would have to be large and close to the shore to have any benefits. I have not assessed alternative structures as they do not form part of the Project. Nonetheless, artificial structures such as these have the potential to create significant adverse natural character and visual effects, and would require substantial management.

RESPONSE TO COUNCIL OFFICERS' SECTION 42A REPORTS

HCC

97. Visual Effects are discussed in 7.3 (page 19) of the section 42A report, with reference to the peer review of the Landscape and Visual Assessment undertaken by Mr Jeremy Head. The report refers to limitations on assessing the visual effects of the proposal given the fact detailed design is yet to be developed and discusses the reliance on the LUDP and BSUDPs as defined in the proposed consent conditions to further mitigate the effects of the proposal.

98. Mr Kellow, an Environmental Planner and the author of the section 42A report, acknowledges (at page 23) that: *"Mr Head's peer review confirmed that the proposal was being considered as a worst case scenario, that is, without improvements that may occur via the LUDP proces*s".

99. Mr Kellow supports a number of amendments to the proposed conditions suggested by Mr Head. They are not set out in 7.3 but I have assumed they are covered in Section 7.2 Recreational Amenity in conjunction with Ms Hamilton's recommended amendments to conditions (pages 16-18, section 42A report).

100. With regard to the concept of developing detail plans post consent approval, I have covered this issue above in my evidence.

101. With regard to the HCC recommended amendments to the conditions:

    (a) GC.5 - Mr Head and Ms Hamilton do not support some of the proposed timeframes in the condition. I agree with Mr Kellow that any risk lies with the applicant. I support retaining the wording of the proposed conditions;

(b) GC.5 - My experience is that minor amendments are almost always required as detailed design progresses. A requirement to have each minor change reviewed would impose a delay on the design process and a not-insignificant burden on the reviewing body. I do not support the amendments;

(c) LV.3 - I support the inclusion of the descriptor ‘suitably qualified’ for experts who will have input into the LUDP;

(d) LV.4 - I do not support the removal of the term ‘general hierarchy’. While I agree with Mr Head and Ms Hamilton that there are links and interdependencies between safety, recreation and landscape effects, any disagreements on the environmental outcomes will be addressed in LV.4. The values relating to safety, ecology, natural character, public access, urban design, recreational and visual amenity will be addressed in the evidence of **Ms van Halderen**.

(e) LV.6 - I support the inclusion of annotated photographic exemplars of best practice coastal shared path projects, so long as they are comparable to the Eastern Bays environment, to demonstrate the level of design to be achieved; and

(f) LV.7 - I support adding surface treatments to the list of specific landscape and urban design details, particularly given that there will be a range of surfaces beyond the shared path that will need to be developed in the management plans, and that surfacing will include the potential use of colour treatments that supplement signage.

102. As explained above, my view remains that the applicant's proposed conditions of consent (as appended to the evidence of **Ms van Halderen** and with or without the inclusion of the recommendations discussed above) will ensure that the level of visual effect is consistent with my conclusions as set out in this evidence.

GWRC

103. Natural Character effects are covered by Mr Watson in section 12.5 (page 72) of his section 42A report, with reference to the peer review of the LVA technical report undertaken by Mr Head and his final Position Statement.

104. Mr Head appended recommended revised conditions to his final Position Statement that he considers are more likely to result in positive outcomes for natural character and landscape effects. He notes that this does not form an acceptance that conditions are an effective substitute for an adequately resolved and appropriately detailed design.

105. The report therefore sets out the same concerns, albeit from the perspective of natural character, on the limitations of assessing the effects of the

proposal given the fact detailed design is yet to be developed. Mr Head's recommendations include the similar amendments to the proposed consent conditions that I have responded to in respect of the HCC section 42A Report above.

106. Mr Watson draws attention to Mr Head's Position Statement where he noted that recommendations in his original peer review had not been acknowledged by the applicant. These related to the use of a dark, visually recessive concrete colour for seawalls and the use of a landscape architect in the selection of any non-local rock material to be used for any revetment. I address these matters below.

Use of coloured concrete

107. Mr Head recommended careful management of concrete colour to ensure it is as dark, visually recessive and uniform as possible. I did not factor concrete colouring into the assessment or recommend that it be used to reduce the visual impact of the seawall for the following reasons:

    (a) textures will be incorporated into the concrete surface of the seawalls to provide opportunities to establish biota habitat. This has added benefits of providing texture on the seawalls surfaces and accelerating the weathering processes, which in turn reduce the visual impact of the concrete;

    (b) it is my opinion that a clear contrast with the asphalt path surface of the Shared Path provides a visual guide to path users and a strongly defined edge; and

    (c) it is my observation that the final finish of concrete with an incorporated dye will vary over time, particularly in terms of efflorescence (the chalky white salt residue that can occur with any product containing cement). Efflorescence can create unpredictable effects in wet and/or saline conditions resulting in a blue-ish colour with a blotched appearance.

108. I agree with Mr Watson that the final colour of the curved seawall will be determined in the LUDP and BSUDP plans, as intended by the proposed conditions.

Revetment rock

109. The issue of revetment rock was canvassed early in the design process when the intertidal ecology experts enquired whether local rock could be used in the revetments because it is more hospitable to intertidal/marine life.

110. **Dr Allis**, who authored the *Coastal Processes Assessment* (Appendix E to the AEE), informed the design team that the in situ/native rock is low quality and is neither suitable nor available to form the bulk of the primary armour of

the rock revetments. He noted that local greywacke quarries produce excellent aggregate, but the fractured rock makes it difficult to obtain large boulders in sufficient volumes. **Dr Allis** addresses this point in his evidence.

111. The final size rock specification for primary armour will be refined during detailed design. However, it is my understanding that revetment material has very specific requirements regarding its composition/weathering/longevity and the rock diameter. **Dr Allis** notes that other coastal rock revetments in Wellington have imported volcanic rock and provided examples such as andesite from Taranaki at Moa Point/Wellington Airport and dolomite from Golden Bay at the Seaview Marina breakwater, which were both high quality blue-grey rock.

112. On this basis, I see little opportunity for landscape architectural input into the final rock selection and do not support a recommendation that a landscape architect be involved in the selection of rock material.

Julia Anne Williams

30 November 2020