

**BEFORE A BOARD OF INQUIRY  
MACKAYS TO PEKA PEKA EXPRESSWAY PROPOSAL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER OF** applications for resource consents and a notice of requirement in relation to the MacKays to Peka Peka Expressway Proposal

**BY** New Zealand Transport Agency

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**STATEMENT OF EVIDENCE OF BRADDYN (BRAD) THOMAS COOMBS  
ON BEHALF OF THE KAPITI COAST DISTRICT COUNCIL**

**Landscape**

**DATE: 5 October 2012**

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## **1. INTRODUCTION**

- 1.1** My full name is Braddyn Thomas Coombs.
- 1.2** I am a Landscape Architect and Director of Isthmus Group Limited (**Isthmus**), a nationwide firm of Landscape Architects and Urban Designers.
- 1.3** I hold the qualification of Bachelor of Landscape Architecture (hons) from Lincoln University and Bachelor of Horticulture from Massey University.
- 1.4** I am a Registered New Zealand Institute of Landscape Architecture (**NZILA**) Landscape Architect, and was a member of the National Executive of the NZILA from 2005-2009. I am the Chairperson of the Bay of Plenty branch of the Resource Management Law Association and a member of the Bay of Plenty Regional Advisory Board for the Sustainable Business Network.
- 1.5** I have undertaken extensive work in the North Island, including subdivision and development projects and district and regional plan policy review in Northland, Auckland, Waikato, Coromandel Peninsula, Bay of Plenty, the Central North Island, Poverty Bay, Manawatu, and Wellington.
- 1.6** I have completed or led broad-scale landscape assessment projects at a catchment or District level for the Rotorua District Council, the Taupo District Council, the Papakura District Council and South Waikato District Council. I have also undertaken landscape and coastal environment assessments of specific development proposals, including the Nga Awa Purua, Te Mihi and Tauhara II geothermal power stations and the Long Gully wind farm.
- 1.7** Of particular relevance to this hearing, I have recently finished working on the District wide landscape, coastal environment and natural character assessments of the Kāpiti Coast District. I have provided the overview and quality assurance checks, assisted in developing the methodology, undertaken assessment tasks and undertaken some of the site assessment.
- 1.8** I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2011, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are 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.

## **2. SCOPE OF EVIDENCE**

**2.1** My evidence will address the extent of the coastal environment in the vicinity of the Mackays to Peka Peka Expressway proposal (**Project**).

**2.2** In preparing my evidence I have read the Evidence in Chief of Boyden Evans and Stephen Fuller for NZTA and the relevant technical reports provided in the Assessment of Environmental Effects (**AEE**).

**2.3** This review has focused on the issues raised by the Council and responded to by the applicant in relation to the extent of the coastal environment in the Kāpiti Coast District, and the general nature and location of the Expressway, rather than the technical details or potential effects of the Project.

**2.4** My evidence is structured as follows:

- (a) Executive summary
- (b) The Kāpiti Coast District Coastal Environment Study
  - Methodology
  - Process and findings
- (c) Matters raised in the applicant's evidence
- (d) Appendices:
  - Appendix 1: Coastal Environment Study (Final)
  - Appendix 2: Relevant policies from the New Zealand Coastal Policy Statement 2010 (**NZCPS**) and Greater Wellington Regional Policy Statement
  - Appendix 3: Coastal environment photographs
  - Appendix 4: Proposed Expressway and Coastal Environment Map

## **3. EXECUTIVE SUMMARY**

**3.1** The Kāpiti Coast District Coastal Environment Study (**CE Study**) and associated report (**CE Report**), attached as Appendix 1, have been undertaken drawing on a range of national legislation and best practice guidance. That guidance has been interpreted and applied to the local landscape, resulting in the identification of the coastal

environment and then within this environment, areas with high natural character values at a District-wide scale.

- 3.2** The inland boundary of the coastal environment identified in the CE Report responds to the biophysical, perceptual and associative values of the District.
- 3.3** In my opinion, the conclusions of Mr Evans and Mr Fuller in relation to whether the Proposal is within the coastal environment focus overly narrowly on factor (c) within Policy 1(2) of the NZCPS. Their approach highlights the 'significance' of coastal processes, influences or qualities, at the expense of the other factors within the full list.
- 3.4** In my opinion, the coastal environment boundary contained in the CE Report is the appropriate boundary and best reflects the legislative and best practice guidance which has developed for the assessment of the coastal environment under Section 6(a) of the RMA.
- 3.5** I note that the proposed Expressway is within the coastal environment boundary contained in the CE Report.

#### **4. THE KAPITI COAST DISTRICT COASTAL ENVIRONMENT STUDY**

- 4.1** Isthmus were engaged by the Council in 2010 to carry out the following tasks at a District-wide scale:
- (a) provide professional assessments of landscape character and significance;
  - (b) identify outstanding natural and significant amenity landscapes and features in the District under sections 6(b) and 7(c) of the RMA; and
  - (c) identify the inland boundary of the coastal environment and associated areas of high natural character under section 6(a) of the RMA and the NZCPS.
- 4.2** Both the CE Report and the Landscape Report have been used as background reports for the District Plan review. The Landscape Study Report is in the process of being finalised subject to further consultation with iwi. The CE Report has been finalised and is attached as **Appendix 1** to this evidence. Both reports will be made publicly available and part of the public consultation processes when the District Plan is notified (expected to be in November 2012).

**4.3** I led the assessment team in both parts of the project and carried out an internal review of the CE Report through each draft. I was assisted by others at Isthmus, principally Lisa Rimmer and Andrew Norriss. Gavin Lister provided input to the development and review of the methodology, but was not involved in the assessment process itself or the review of the document. Isobel Gabites of NaturalTEXTures provided specialist ecological services as part of the study, specifically to help to identify areas of high natural character. Louise Strogon of Aurecon was also part of the project team, and assisted in the preparation of a Planning Recommendations Report.

## **Methodology**

**4.4** The coastal environment in the District was identified and mapped in the CE Study after consideration of national and regional policies and other best practice guidance as set out in more detail in **Appendix 1**. I discuss these policies and guidance below.

**4.5** Policy 1(1) of the NZCPS recognises that the coastal environment is place specific, and the extent of it can be unique to that region or locality:

Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities.

**4.6** Policy 1(2) of the NZCPS sets out **nine** factors or aspects that are recognised as being included in the coastal environment. These factors encompass biophysical, visual amenity and cultural matters (referred to as physical, perceptual and associative matters in the CE Report):

- (a) the coastal marine area;
- (b) islands within the coastal marine area;
- (c) areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, salt marshes, coastal wetlands, and the margins of these;
- (d) areas at risk from coastal erosion;
- (e) coastal vegetation and the habitat of indigenous coastal species including migratory birds;
- (f) elements and features that contribute to the natural character, landscape, visual qualities or amenity values;
- (g) items of cultural and historic heritage in the coastal marine area or on the coast;
- (h) inter-related coastal marine and terrestrial systems, including the intertidal zone; and
- (i) physical resources and built facilities, including infrastructure, that have modified the coastal environment.

**4.7** In setting out those factors in Policy 1(2) that are included in the coastal environment, the NZCPS does not provide an exhaustive or exclusive list where individual factors are focused on and discounted. Assessing the values of the coastal environment is a

process of understanding and balancing all of the factors set out in Policy 1(2) to understand their extent and significance. The absence of a factor or a number of factors will not necessarily mean that the area is not within the coastal environment.

**4.8** Policy 4 of the proposed Regional Policy Statement<sup>1</sup> (**Proposed RPS**) identifies **four** criteria to be used in the identification of the landward extent of the coastal environment. In keeping with the NZCPS 2010 these criteria include the consideration of biophysical, perceptual and associative matters including, and as is particularly relevant to Kapiti:

- (a) any area or landform dominated by coastal vegetation or habitat;
- (b) any land form affected by active coastal processes, excluding tsunamis;
- (c) any landscapes or features, including coastal escarpments, that contribute to natural character, visual quality or amenity value of the coast.
- (d) any site, structure, place or area of historic heritage value adjacent to, or connected with, the coastal marine area, which derives its heritage value from a coastal location.

**4.9** I note that these are not criteria to be strictly applied, but are factors, or aspects, similar in nature and application to those listed in Policy 1(2) of the NZCPS.

**4.10** The operative Kāpiti Coast District Plan was also considered in the CE Study, given that it contains a working definition of the coastal environment and represents an approach that has been through a submission process and has therefore been tested and represents to some extent, the views or perceptions of the Kāpiti community. The District Plan states:

C.9-3 The extent of the coastal environment, subject to the above objective and policies is generally the coastal plain which consists of the fore-dunes, consolidated dunes and interdunal hollows west of State Highway 1.

**4.11** While this statement does not purport to be a precise description of the extent of the coastal environment within the District, it uses some similar concepts to those contained in the NZCPS and has been considered in the methodology of the CE Report. I note that the line of SH1 is arbitrary in a landscape and coastal environment sense, as it crosses the coastal plain where no discernible change in landform, geology, topography, vegetation, or land use is evident.

**4.12** Best practice guidance was gained from a review of other relevant documents, coastal environment studies and case law<sup>2</sup>. In particular, decision makers and natural character

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<sup>1</sup> At the time of writing I understand that appeals on this policy are nearing resolution.

<sup>2</sup> In addition to those listed in the main text of the evidence, a number of case law sources, in particular, have been used, including but not limited to:

- o *Northland Regional Planning Authority v Whangarei County Council*. [1976] A63/76.
- o *Kaupokonui Beach Society v South Taranaki District Council*. W30/08.

studies have given some considerable credence to a study completed for the Ministry for the Environment.

**4.13** That study culminated in a report entitled "Ministry for the Environment Environmental Performance Indicators Landscape Aspect of Natural Character", 2002, authored by Boffa Miskell Ltd. Although not government policy, this study identified four layers (as illustrated in the diagram in **Appendix 2**<sup>3</sup>) that together make up the coastal environment. These layers are often referred to in district wide studies and assessments of the effects of applications when describing the way in which the inland boundary of the coastal environment can be determined and the varying degree with which coastal processes are present. The four layers include:

- (a) Marine (i.e. the seascape from the 12 mile limit to MHWS (mean high water spring tide))
- (b) Intertidal (i.e. wave wash area)
- (c) Coastal dominance zone (i.e. land derived from coastal processes)
- (d) Coastal influence (i.e. the landward backdrop in the inland extent of the coastal environment; in some landscape types this would be delineated by distance)

**4.14** The 2002 combined Wairarapa Coastal Strategy Technical Report, which was used as a background report for the Wairarapa Combined District Plan, was also considered. Whilst carried out prior to the 2010 review of the NZCPS, this study was the only other coastal environment study available in the Wellington Region at the time of the CE Study.

**4.15** The Wairarapa Combined District Plan (based on the Wairarapa Coastal Strategy Technical Report) has been through the public District Plan review process in the period since the guidance from the NZCPS 2010 and the proposed RPS have been available. The inland boundary of the coastal environment is now identified on the Planning Maps in the operative Wairarapa Combined District Plan, an example of which is included in **Appendix 2**. As is relevant to the Kāpiti Coast District, the area identified in the Planning Maps is often defined by the ridgeline of prominent escarpments beyond the coastal plain and at some distance from the coast. The landforms contained within the mapped area include coastal plains and coastal escarpments, similar to Kāpiti Coast. The maximum distance of the inland boundary of the coastal environment appears to be approximately 2km, sometimes up to the first leading ridge. In other locations the inland extent of the coastal environment appears to be approximately 500m.

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○ *Pigeon Bay Aquaculture Ltd v Canterbury Regional Council. C179/03.*  
○ *Final Report and Decision of the Board of Inquiry into the Hauauru ma Raki Wind Farm and Infrastructure Connection to Grid. May 2011.*  
○ *Long Bay–Okura Great Parks Society Incorporated v North Shore City Council (A78/08)*

<sup>3</sup> The diagram has been reproduced from the MfE report for the purpose of my evidence.

- 4.16** Coastal environment maps included in the proposed Waikato Regional Policy Statement (2012) were reviewed in the process of finalising the Kāpiti CE Study. Within the Waikato Region the coastal environment is variably identified along contours to a prominent ridgeline, in many areas 2-3km from the coast.
- 4.17** Methodology and internal review processes were used to integrate best practice guidance gained from Isthmus' collective experience in the delivery and peer review of landscape and visual assessments for large scale land development infrastructure projects such as the Hauauru ma raki Windfarm (Waikato), Long Gully Wind Farm (Wellington) and the Long Bay Environment Court hearing (Auckland). Each of these projects has required a detailed assessment of the coastal environment in a range of locations and underlying landforms.
- 4.18** In identifying the above sources that were reviewed in the development of the methodology it should be noted that the methodology used in Kāpiti was not simply to adopt a single source or method from a previous study. The collective guidance of all of the sources reviewed led to a methodology that was tailored to the Kāpiti Coast District.
- 4.19** In summary, along with the in-depth study of the District's patterns of landform, land use and land cover that had been carried out during the Landscape Study, the studies, guidance and experience outlined above were drawn upon to establish an assessment process in which:
- (a) The consideration of perceptual and associative (cultural) matters resulted in the identification of the extent of the coastal environment. The impact of physical coastal processes may not be significant beyond the immediate foredunes, but coastal influences and qualities are significant across a much broader area and contribute to the heritage values, visual qualities and amenity values of the coast. The range of influences and qualities within the coastal environment are illustrated in **Photographs 1 to 10** attached in **Appendix 3**.
  - (b) Most of these perceptual and associative matters relate to the coastal processes that have generated many of the lowland areas in the district, and the way in which the uplifted dune land forms and related hydrological and vegetation patterns have influenced and continue to influence settlement and other activities (despite the fact that these processes are no longer active



beyond the foredunes). It is the ongoing influence and qualities established by active coastal processes that first attracted settlement by Maori across the coastal plain, that provided for some of the first commercial interests through flax harvesting, utilising the resources of the inter-dunal wetlands, and that determined where and how the area could be converted to farming and the best place for towns and transportation routes to be established. The less pronounced dune lands around Paraparaumu are an obvious example of this, where the coastal processes of erosion and deposition were impacted by the sheltering effects of Kapiti Island, resulting in a broader lowland area with more subdued dune landforms that were easier to develop. Significant coastal qualities (in close proximity to a metropolitan area) have arguably continued to attract new residents into the District. In summary, the lowland areas of the District can attribute much of their natural and cultural heritage to the ongoing influences and qualities of the coast.

- (c) Weather patterns and remaining areas of native vegetation through to the escarpments provide a further rationale for the identification of the coastal environment. Predominant and often salt laden, nor-westerly winds determine the seasonal and daily climatic influence across the coastal plains to the escarpments. Remaining areas of native vegetation are dominated by species that are tolerant of duneland soils, often show the influence of strong coastal winds and salt spray, and feature wetland plant communities and habitats that, whilst not obligate to the tide, are obviously influenced by the hydrological patterns established by coastal dunes.
  
- (d) Coastal processes and their ongoing influence or qualities have significantly impacted on a range of landscapes that are evident in the lowlands. Although modified by development, and regularly intercepted streams and rivers, the varying pattern or formations of the dunes and the way in which these have determined hydrological and vegetation patterns, have established the underlying character of the lowland landscapes even though they are at a considerable distance from the coast. For example, along the southern and northern boundaries of the District, the lowland landscapes are characterised by the larger parabolic dunes and remnant interdunal wetlands and lakes, near the foreland by the more moderate sand 'plain' and its confluence with the Waikanae River. Between Peka Peka and the Otaki River it is a linear sequence of dunes and distinct sea cliffs that sets up the underlying landscape framework (as illustrated in **Photographs 2, 4 and 6 in Appendix 3**).

- (e) Direct visual links contribute to the perception of the extent of the coastal environment, including views to the coast from private properties as well as public roads and lookouts (as illustrated in **Photographs 1, 3, 4, and 6** in **Appendix 3**), and back from the coast where landforms establish an obvious inland extent and/or contribute to the visual amenity of the coast. In this context, the distinct escarpments of Paekakariki, Matahuika, Otaihanga and Hemi Matenga provide a distinct 'landward backdrop' to the coast and a marked ridgeline that define the physical area (as illustrated in **Photographs 2, 5, and 6** in **Appendix 3**). At the ridgeline of the Hemi Matenga escarpment, the coastal environment extends some 5km inland. Coastal vegetation, including kohekohe, is prominent on the Hemi Matenga escarpment.
- (f) The inland boundary of the coastal environment to the north of the Hemi Matenga escarpment is less distinct, but is generally aligned with the inland extent of significant dune landforms and inland sea cliffs. The coastal environment boundary is at its narrowest, approximately 2 kilometres inland, where the active processes and ongoing influences and qualities of the Otaki River have a more obvious impact on the physical, perceptual and associative aspects of the area.

## Process and findings

- 4.20** In line with the background material, guidance and the assessment methodology described above, the inland extent (as illustrated in **Figures 2.1 to 2.6** in the CE Report in **Appendix 1**) of the Kapiti Coast District was mapped through the combined process of desktop analysis and fieldwork.
- 4.21** The desktop analysis utilised landform, land cover and land use GIS data and high resolution aerial photographs (flown in 2007), as provided by the Kapiti Coast District Council. This included the Greater Wellington Regional Council GIS Database<sup>4</sup>, the District Plan data layers, an updated ecosites register and 5m contour data. This data analysis was complemented by a review of a wide range of digital and printed sources of information that were reviewed as part of the Landscape Study, such as Bruce McFadgen's study<sup>5</sup> of the archaeology and land formation processes of the dune sequence in the District.

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<sup>4</sup> In 2010 Greater Wellington Regional Council provided a consistent set of landscape related GIS data to all Councils in the region to assist with the implementation of the NZCPS and RPS.

<sup>5</sup> McFadgen, B. (1997). *Archaeology of the Wellington Conservancy: Kapiti-Horowhenua. A prehistoric and palaeoenvironmental study*. Department of Conservation: Wellington

- 4.22** Field work was used to provide additional ecology input<sup>6</sup> and to test the mapping process from locations able to be accessed by public roads.
- 4.23** The maps were drawn first in AutoCAD over geo-referenced aerial photographs and data layers, and then converted to a more graphic format over a topographic maps base for documentation.
- 4.24** The two key limitations of this process, as acknowledged in the CE Report, relate to:
- (a) The District-wide scale of the assessment, which resulted in a reliance on a desktop analysis complemented by fieldwork. That is, some refinement of the inland boundary may occur at a finer grain of assessment and further fieldwork. This may be complemented by project related assessment, but arguably needs to consider the broader scope of physical, perceptual and associative matters than is able to be distinguished on a site by site basis. Given that the purpose of identifying the extent of the coastal environment is related to the management of natural character values under section 6(a) of the RMA, once the extent of the coastal environment has been confirmed through the District Plan process, it is more useful for project related assessment to focus on the nature and extent of the existing natural character values and their management.
  - (b) Boundary blur or a zone of transition. For the purpose of the study, a definite line has been drawn that identifies the extent of the coastal environment. However, in practical terms, the shift from coastal to non-coastal environment is unlikely to be that clear on the ground, where patterns of landform, land cover and land use often change gradually, and seasonal/daily weather conditions will influence perceptions of its extent.
- 4.25** The limitations set out above are common for a district scale assessment of landscape values, and in this case the coastal environment. A regional scale assessment would be of an even more general scale, and would generally result in more generalised and coarser areas and values being identified. Likewise, a project specific assessment can

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<sup>6</sup> The study area for the specialist ecologist survey is taken to be approximately 1km from the MHWS inland, or to an altitude of approximately 120m. Land formation/old physical process, wildlife, old native vegetation and new native vegetation values were assessed using a qualitative 'decision tree' and a three point scale: low; low-moderate to moderate; and moderate-high to high in 56 areas along the coast with 26 areas identified as having high indigenous ecological character values on one or more counts. These areas were then mapped using high resolution aerial photographs and the boundaries converted to shape-files for further analysis in GIS.

be refined to a smaller scale, and can be more accurate in terms of the individual values identified, however often it lacks the overall perspective and relativity of a District or Regional scale assessment. These limitations are inherent in the scale of the work being undertaken.

- 4.26** As illustrated in **Appendix 4**, the proposed Expressway Designation is located entirely within the coastal environment as mapped in the CE Report.

## **5. MATTERS RAISED IN THE APPLICANT'S EVIDENCE**

- 5.1** Matters relevant to the identification of the inland extent of the coastal environment are raised in the statements of evidence prepared by Boyden Evans (Landscape) and Stephen Fuller (Ecological Mitigation, Environmental Management and Monitoring). I will address each of these statements in turn. Robert Schofield's (Planning) statement reiterates the opinions of Mr Evans and Mr Fuller with respect to the inland extent of the coastal environment, so there is no need to respond to this separately. Mr Schofield also notes that the CE Report is not yet a public document and has not been through a process of consultation. Notwithstanding my comments in paragraph 4.2 above, I will leave others to address these planning matters.

- 5.2** Mr Evans' evidence (drawing in part from Mr Fuller's evidence) indicates that he is of the opinion that no part of the Mackays to Peka Peka Expressway Proposal is within the Coastal Environment and therefore no assessment of the effects of the proposal on the natural character values of the area under Policy 13 of the NZCPS is warranted. This discussion is set out at paragraphs 172 - 181 of Mr Evans' evidence.

- 5.3** Mr Evans addresses coastal environment matters directly in the description of the Existing Landscape (paragraph 41 - 44) and in his response to submissions (paragraph 172 - 181). Both parts of his evidence, in essence, document his opinion that:

[42] The Project does not lie within the coastal environment. While I acknowledge that the sand country between the foothills of the Tararua Ranges and the coastline results from coastal processes, the active coastal processes and dynamic influences of the coast do not significantly continue to shape the inland area where the Project is proposed.

[43] Where the expressway crosses the Waikanae River, approximately 2km from the coast... the area has no perceptible coastal characteristics.

- 5.4** There are two matters that are relevant for me to respond to.

**5.5** First, having set out the background and methodology and having carried out an in-depth study of the landscapes of the District, I do not agree with Mr Evans' opinion that the Expressway route is outside of the coastal environment. Based on the brief statement in his evidence, in my opinion, this conclusion relates to an overly narrow interpretation of Policy 1 of the NZCPS 2010. That is, Mr Evans appears to assert that biophysical factors are all that need to be taken into account when assessing the extent of the coastal environment, rather than their integrated consideration with other perceptual and associative matters as is set out in the policy, the RPS and the full suite of guidance documents and examples set out above.

**5.6** In focusing on one of the factors identified in Policy 1(2) of the NZCPS 2010 (factor (c)), Mr Evans appears to downplay the rest of the factors, which as I have said are not exclusive:

(c) areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, salt marshes, coastal wetlands, and the margins of these;

**5.7** I do, however, agree that "*the active coastal processes and dynamic influences of the coast do not continue to shape the inland area where the Project is proposed*" but, in my opinion, this places the project outside the area of coastal dominance rather than outside the coastal environment. The zone of coastal influence (within which the Project appears to fall) is still within the coastal environment.

**5.8** Secondly, whilst I would generally concur with Mr Evans' assessment of the extent of active coastal processes evident where the Expressway would cross the Waikanae River, in my opinion such observations are useful to the further distinction of the coastal dominance zone rather than the coastal environment. I also agree with Mr Evans' inference in paragraphs 44, 175 and 182 of his evidence that it is the overall landscape and natural character values of the Waikanae River under section 6(a) that are of relevance to these proceedings.

**5.9** Finally, Mr Evans mentions three other NZCPS coastal natural character assessments that Boffa Miskell has carried out which have informed the company wide methodology, although only two have been named (the Bay of Plenty Regional Study and the Marlborough Regional Study). While these two studies are of interest and some relevance, I refer again to Policy 1(1) of the NZCPS:

Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities.

**5.10** The translocation of a methodology for coastal environment assessment from a different region or part of the country will not necessarily result in a contextual assessment of the coastal environment or natural character values of an area. The important step is the consideration of local factors, as alluded to in Policy 1(1) of the NZCPS.

**5.11** Mr Fuller's evidence addresses coastal environment matters within his response to submissions (paragraphs 125 - 134). Mr Fuller concurs with Mr Evans that the Project is not located in the Coastal Environment. In doing so (at paragraph 129 of his evidence) he refers to one of the nine coastal environment aspects or factors recognised in Policy 1(2) of the NZCPS:

(c) areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, salt marshes, coastal wetlands, and the margins of these

**5.12** In paragraphs 130-132, Mr Fuller provides a description of what coastal processes are, his assessment of the Project area, and the absence of habitats or communities that are:

obligate to, or preferentially inhabit environments that are dominated by coastal influences.

**5.13** I have no doubt that this statement is correct; however, in my opinion, this does not mean that the Project is outside the coastal environment. As is set out in the NZCPS, the RPS and other documents as described above, the assessment of the inland extent of the coastal environment needs to consider biophysical, perceptual and associative matters. As in the CE Study, a survey and evaluation of the ecological values in a District will form an important part of the assessment, but needs to be considered in an integrated manner along with other definitive aspects. The fact that an area is not *dominated* by coastal influences or vegetation does not mean it is not within the area of coastal influence and therefore within the coastal environment.

**5.14** As with Mr Evans' assessment, it is my opinion that Mr Fuller has incorrectly focused on factor (c) of Policy 1(2) of the NZCPS 2010, at the expense of those factors that relate to perceptual and associative matters.

**5.15** In summary, none of the matters raised in the above statements of evidence alters my view that the CE Report appropriately describes the extent of the coastal environment.

## **6. CONCLUSION**

- 6.1** The CE Study and CE Report, attached as Appendix 1, have been undertaken drawing on a range of national legislation and best practice guidance. That guidance has been interpreted and applied to the local landscape, resulting in the identification of the coastal environment and then, within this environment, areas with high natural character values at a District-wide scale.
- 6.2** The inland boundary of the coastal environment identified in the CE Report responds to the biophysical, perceptual and associative values of the District.
- 6.3** In my opinion, the conclusions of Mr Evans and Mr Fuller in relation to whether the Proposal is within the coastal environment focus overly narrowly on factor (c) within Policy 1(2) of the NZCPS, which highlights the 'significance' of coastal processes, influences or qualities, at the expense of the other factors within the full list.
- 6.4** In my opinion, the coastal environment boundary contained in the CE Report is the appropriate boundary and best reflects the legislative and best practice guidance which has developed for the assessment of the coastal environment under Section 6(a) of the RMA.
- 6.5** I note that the proposed Expressway is within the coastal environment boundary contained in the CE Report.



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