

Before the Independent Hearing Panel
Appointed by the Dunedin City Council

Under the Resource Management Act 1991 (**RMA**)

In the matter of an application by **Dunedin City Council** and the **Department of Conservation** for consent to realign the Tunnel Beach Walkway and construct and operate a carpark at Tunnel Beach, Dunedin

Dunedin City Council and Department of Conservation

Applicants

Statement of evidence of Wade Robertson

20 April 2022

Applicant's solicitor:

Michael Garbett
Anderson Lloyd
Level 12, Otago House, 477 Moray Place, Dunedin 9016
Private Bag 1959, Dunedin 9054
DX Box YX10107 Dunedin
p + 64 3 477 3973
michael.garbett@al.nz

**anderson
lloyd.**

Qualifications and experience

- 1 My name is **Wade Robertson**.
- 2 I am a Principal Landscape Architect at Beca.
- 3 I have a Master of Landscape Architecture from Lincoln University and I am a Registered Member of the New Zealand Institute of Landscape Architects.
- 4 I have practised for 18 years, based in Wellington, Auckland and now Christchurch. My experience consists largely of preparing landscape and visual assessments for a wide range of development projects located across New Zealand. My experience in assessing the landscape and visual effects of projects located in the coastal environment is of particular relevance and includes:
 - (a) **Te Whau Coastal Pathway, Auckland Council, 2021** – preparation of a landscape and visual assessment to support a Notice of Requirement for approximately 7.1km of proposed boardwalk and 3.3km of proposed footpath located within and directly adjacent to the Te Whau River corridor. The assessment included the preparation of visual simulations and full consideration of landscape, natural character and visual effects including impacts on significantly affected adjacent residential properties;
 - (b) **Northern Pathway (aka Skypath & Seapath), NZTA, 2020** – preparation of a landscape and visual assessment to support a Notice of Requirement and resource consent application for a shared pathway stretching across the Auckland Harbour Bridge, from Westhaven to Esmond Road on the North Shore. The assessment included the preparation of visual simulations and full consideration of landscape, natural character and visual effects on a wide range of key landscape features (including the coastal environment) and viewing audiences;
 - (c) **Waikowhai Coastal Boardwalk (Stage 2), Auckland Council, 2019** – peer reviewer for the landscape and visual assessment that accompanied the resource consent for the 670m long coastal boardwalk spanning from Bamfield Reserve to Taylors Bay Road Reserve in Hillsborough, Auckland;
 - (d) **MV Rena Project, The Swedish Club, 2012 – 2017** – preparation of an assessment of effects on natural character and landscape resulting from the recovery and remediation of the MV Rena, which

founded on Astrolabe Reef in the Bay of Plenty. The assessment was prepared in support of a resource consent application to abandon the remains of the Rena on the reef and it considered the natural character and landscape values of the Reef under the RMA (1991) and NZCPS (2010). It also included a review of several recent natural character assessments from around New Zealand; and

- (e) **AMETI Phase 2 Notice of Requirement, Auckland Transport, 2013 – 2016** – lead landscape architect responsible for the preparation of an assessment of landscape and visual effects (including visual simulations) of the proposed designations and future development of the proposed additional bus lanes and carriageway realignment between Pakuranga (mall) and Panmure roundabout. The project spanned the Tamaki River and Panmure Basin inlet.

- 5 Prior to resource consent lodgement and public submissions my involvement in the project was in a technical review role. I oversaw the preparation of the original Landscape and Visual Assessment (prepared by Anne Lasse) that addressed the proposed carpark development. I subsequently prepared a memorandum that included a high level, desk top assessment of the effects of the proposed track alignment. Following the receipt of public submissions I visited the site, including the immediately surrounding rural residential area, proposed carpark site and both existing and proposed pathway alignments down to Tunnel Beach.
- 6 My evidence is the culmination of this combined project involvement and has been prepared taking account of the NZILA's¹ recently released Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines.
- 7 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of evidence

- 8 I have been asked to prepare evidence related to the landscape and visual effects of the proposal. This includes:

¹ Tuia Pito Ora | New Zealand Institute of Landscape Architects

- (a) A brief description of the proposal and those changes/ impacts that are most relevant to the assessment of landscape and visual effects;
- (b) A brief description of the existing environment;
- (c) An assessment of existing landscape character, including rural character and natural character (i.e. the character and quality of the existing environment);
- (d) An assessment of the landscape (including rural-residential amenity and natural character) and visual effects of the proposed carpark and access track;
- (e) Comment on section 42A report and proposed conditions, as they relate to landscape and visual matters;
- (f) Response to submissions; and
- (g) Conclusion.

Executive summary

- 9 The proposal consists of two key aspects, being:
 - (a) construction of a new car park area, including toilets, amenities, acoustic fence and bund, low retaining walls and a combination of amenity and revegetation planting; and
 - (b) upgrades to an existing walking track and construction of new section of track, to provide increased accessibility to the Tunnel Beach landscape for both day visitors and short stop travelers.
- 10 The site is located on Dunedin's South Coast with a clear physical delineation between the flat to rolling, rural-residential table lands to the north and the largely unmodified and highly natural hill slopes and coastal escarpments to the south.
- 11 While both areas are undoubtedly 'coastal' the degree of natural character associated with the steep hills and escarpments is notably higher than that of the upper rural-residential land. This is reflected in the landscape and natural character overlays of the 2nd Generation District Plan (2GP) which includes the hill faces and escarpments to the south but excludes the flat to rolling land to the north.

- 12 Community associations with the wider Tunnel Beach landscape, including those of Mana Whenua are widely recognised and shared contributing to a moderate to high degree of associative value (aka meaning to people).
- 13 From a landscape values perspective, the land to the north exhibits a high degree of rural-residential amenity, which detracts noticeably from natural character, being low to moderate in degree. The land to the south however exhibits a high degree of natural character owing to the influence of natural coastal processes on both physical and perceptual aspects of the landscape.
- 14 The effects of the proposal can also be considered separately and in the context of (firstly) the proposed carpark and (secondly) the proposed changes to the walking track.

Carpark effects

- 15 On balance, adverse effects on rural-residential character and amenity resulting from the proposed carpark will be low and effects on natural character will be low moderate. This is because:
 - (a) Taken together, the alteration to existing landform and removal of existing, low quality, exotic vegetation will be mitigated by proposed planting and overall **physical effects will be low moderate in degree**;
 - (b) While the carpark represents a notable change in the appearance of this discrete part of the local rural-residential landscape, overall **visual effects** on both residential properties and road users **will be low**; and
 - (c) **Experiential effects will be low** because the carpark is building on an existing activity which is familiar to users. It is providing for the currently ad hoc and (at times) overloaded carparking situation to be relocated and accommodated in a more effective and efficient manner.

Walkway effects

- 16 On balance, adverse natural character effects on the steep hill slopes will be low and the most valuable aspects of the Tunnel Beach coastal landscape, being the sandstone cliffs and herb fields will be unaffected by the proposed walking track. This is because:
 - (a) **Adverse physical effects will be very low**, with localised effects of the new walking track on vegetation and landform being countered by

the avoidance of effects on the most valuable aspects of the Tunnel Beach landscape. Deconstruction and remediation of the existing walking track will be an important factor in mitigating these potential physical effects;

- (b) The proposed walking track will generally **enhance perceptual and experiential aspects** of the Tunnel Beach landscape by providing a safer and more accessible visitor experience as well as the proposed viewing areas 'opening up' new views and opportunities to experience and appreciate the coastal environment;
- (c) Like mitigation of physical effects, the deconstruction and remediation of the existing walking track will be an important factor in mitigating potential visual effects. Taking these measures into account resulting **cumulative visual effects will be of a low degree**; and
- (d) The role that the proposed viewing areas and interpretation information will have in building people's sense of understanding and connection with 'this place' is a **positive effect in terms of associative values**.

- 17 On balance, the overall effects of the proposal (carpark and walkway) on landscape character, including natural character and rural-residential amenity will be low.

The Proposal

- 18 The proposal has been outlined in the application and section 42A report and I do not propose to repeat that detail here. The aspects of the proposal that are most relevant to the assessment of landscape and visual assessment include:

19 *Carpark*

- (a) The construction of a new car park area, including toilets, amenities, acoustic fence and bund and a combination of amenity and revegetation planting.
- (b) The carpark will *improve* the overall level of service for people visiting Tunnel Beach, via a more formalised and navigable layout. It is not however designed to significantly *increase* overall visitor numbers or proliferation of vehicles at the site. This is relevant when considering the overall balance between natural and non-natural (i.e. man made) physical and perceived elements in the coastal environment.

- (c) It will have a larger overall footprint when compared to the existing visitor parking area along Tunnel Beach Road, although areas of hardstand (i.e. asphalt or chip seal) constitute <50% of the proposal footprint, the majority of the area consisting of loose gravels and planting. Again, this is relevant to natural character and also the perceptual aspects of rural-residential character.
- (d) The terraced profile means that the carpark will be lower than the adjacent road level and stepping down the south by approximately 2m, with small retaining walls providing for compliant carpark grades. This means that the carpark, aided by proposed planting, will 'sit down' into the landscape and potential visual prominence from adjacent properties and the road corridor will be reduced.
- (e) Potential visual prominence of the carpark for the closest dwelling (31 Tunnel Beach Road) will be lessened further by the 1.5m high closed board timber fence proposed along the northeastern site boundary.

20 *Walking Track*

- (a) The upgrade of the walking track is to provide for increased accessibility for day visitors and short stop travelers seeking to experience the Tunnel Beach landscape. Providing for a more useable and enjoyable experience of the coastal environment will positively impact perceptual and experiential aspects of natural character.
- (b) The introduction of new sections of walking track and upgrades to existing sections will result in an overall increase in track length by approximately 400m, although the general look and feel of the track will remain. The approach to track alignment, including following existing contours, sidling along hill faces and utilising localised flat areas, means the overall prominence of the proposed track will be comparable with the existing track.
- (c) The establishment of three (3) viewpoints including way finding, interpretation panels and seating will improve the overall visitor experience and importantly, provides opportunities for visitors to connect with the history and associative values of the site and wider coastal landscape.

Existing Environment

Physical aspects

- 21 Owing to its proximity to the Pacific Ocean, the local landscape is heavily influenced by natural coastal process. The transition in landform from flat to gently rolling 'table land', to steep coastal hill faces and dramatic coastal escarpment is the most defining landscape characteristic in this regard.
- 22 The impact that wave and wind exposure have on the defining sandstone escarpments is evident along this stretch of the south coast. Tunnel Beach itself is a fantastic example of these coastal processes at play where erosion continues to 'eat away' at the Caversham sandstone cliffs while the rolling 'herb field' sits somewhat precariously above.
- 23 Vegetation distribution is also heavily influenced by these coastal processes. Where pasture dominates flatter elevated areas, the steep hill slopes are characterised by a blend of pasture giving way to regenerating native vegetation and more densely vegetated gullies. The margins above the coastal escarpments are also home to highly sensitive coastal herb fields and again, Tunnel Beach is an exemplar of this.
- 24 While the upper rolling table land is characterised by pastoral land cover (i.e. grass and shelterbelts) the underlying predominately rural-residential land use introduces an increased level of modification to the landscape.
- 25 The presence of residential dwellings, utility buildings, boundary and amenity planting, fences, roads, light and power poles result in a typical rural-residential character, where aspects of human intervention and development sit within an open and largely 'green' setting.
- 26 In physical terms there is a clear delineation between the flat to rolling, rural-residential table lands to the north and the largely unmodified and highly natural hill slopes and coastal escarpments to the south. While both areas are undoubtedly 'coastal' the degree of natural character associated with the steep hills and escarpments is notably higher than that of the upper rural-residential land.
- 27 This results in a clear distinction of the coastal environment², being the 'line' that is reflected in the relevant 2nd Generation Plan natural character overlays.

² NZCPS Policy 1 "*areas where coastal processes, influences or qualities are significant...*" (amongst other things)

Perceptual & Experiential Aspects

- 28 The open, expansive views and sense of remoteness and (often) wildness characterise the Tunnel Beach experience, which is unique in the sense that Dunedin's urban fringe is relatively close, and the site is directly adjacent to rural-residential development.
- 29 There is a sense of slow reveal as you travel from the city to the site, with Corstorphine's suburban character giving way to the rural-residential character along Blackhead Road. As visitors turn on to Tunnel Beach Road and travel towards the proposed car park site, the expansive coastal landscape reveals itself.
- 30 There is a tangible sense of arrival at the end of the road and the scale, dominance, remoteness, and expansiveness of the local landscape becomes even more apparent as one moves down the existing walking track.
- 31 There is an overwhelming sense of scale and isolation in the lower sections of the walkway when the visual connection with rural-residential development is lost.
- 32 This remoteness is heightened when standing at the end of the walking track adjacent to the Tunnel Beach headland, and even further when standing on Tunnel Beach; with steep, highly eroded coastal escapements above and the open ocean to the south.
- 33 Transient aspects of the coastal environment, like changes in weather, tides, wind conditions, visibility all add to the overall Tunnel Beach experience and result in a high degree of natural character.
- 34 The proposed carparks visual catchment is very small and limited to Tunnel Beach Road, the neighbouring properties to the north and east of the site, and the upper most section of Tunnel Beach walking track itself.
- 35 Views of the proposed walking track are limited to track users and from vessels travelling along the south coast.
- 36 Following the physical delineation I described previously, there is also a clear experiential delineation between the rural-residential land to the north and the steep hill slopes and escarpments to the south.
- 37 While the land to the north exhibits a high degree of rural-residential amenity the level of development present in the landscape detracts noticeably from natural character, which is low to moderate in degree. The land to the south of Tunnel Beach Road beyond the flatter rural-residential

land, exhibits a high degree of natural character as I have described previously.

Associative Aspects

- 38 The Otago coastline has many sites of significance to Mana Whenua. The connections and values that they attribute to this stretch of coastline, including the Tunnel Beach area are well documented and widely acknowledged in the likes of the AEE and the 2GP.
- 39 There are also strong historical associations for European/Pakeha, with the tunnel at Tunnel Beach being cut by John Cargill (son of Captain William Cargill) for access to the beach for his family.
- 40 The construction of the proposed carpark and walking track upgrades reflect contemporary associations with the Tunnel Beach landscape, where both locals and visitors to Dunedin are visiting the site with regularity.
- 41 In this sense, associations with the site are widely recognised and shared across the community and contribute to a moderate to high degree of associative value.

Landscape effects

- 42 The effects of the proposal can be separated into:
 - (a) effects on rural-residential land resulting from the carpark; and
 - (b) effects on coastal natural character of the steep hill slopes, resulting from the walking track realignment.

Carpark

- 43 The impacts on the **physical aspects** of the landscape will be limited to the footprint of the proposed carpark, including areas of hardstand and amenity and remediation planting.
- 44 The extent of proposed cut and fill represents a fundamental change to the immediately underlying landform.
- 45 The introduction of (circa) 1m high retaining walls and the 1:3 gradient fill slope to the south (i.e. running downslope) representing a notable 'geometric' shift from the gently sloping land that exists.
- 46 The removal of existing vegetation cover, albeit of low quality represents a further change to the existing physical attributes of the carpark site.

- 47 In considering these changes to the existing site it is relevant to note that neither the landform itself or the existing vegetation within the carpark footprint are of any significance in terms of rarity or value to the wider coastal landscape.
- 48 While there are no carparks of this nature in the immediate vicinity, the surrounding rural-residential development matrix provides some precedent for landform modification, primarily through the establishment of building platforms, houses and sheds and curtilage.
- 49 The level of modification associated with the carpark is generally consistent with that exhibited in the surrounding landscape and the adjacent roading network also provides context in terms of hardstand in the local setting.
- 50 The impacts of the proposed carpark on physical aspects of the rural-residential landscape will be lessened by the introduction of amenity and re-vegetation planting as well as reclamation of a portion of the road corridor via a footpath and grass verge.
- 51 Taken together, the alteration to existing landform and removal of existing, low quality, exotic vegetation will be mitigated by proposed native planting and overall **physical effects will be low moderate in degree.**
- 52 **Perceptual and experiential** impacts of the proposal relate to the change in both the form and function of the site and contribution the proposed carpark has on the appreciation that residents and visitors have for the existing environment.
- 53 Views from rural-residential dwellings are limited in all directions, except for the dwelling located at 31 Tunnel Beach Road immediately to the east of the proposed carpark. Views from the property to the west (40 Tunnel Beach Road) are screened by mature *macrocarpa* trees and shelterbelts while views from the property to the north (25 Tunnel Beach Road) are screened by existing earth bunds. With the carpark being lower than the existing road level, any views from the dwelling to the northwest (22 Tunnel Beach Road) will be screened by amenity planting located along the northern edge of the carpark. **Visual effects on these properties will be very low.**
- 54 The buildings located at 31 Tunnel Beach Road (to the east) are between 15 and 20m from the site and oriented away from the proposed carpark. An existing earth bund and closed-board timber fence exist along the properties northern and western boundaries and screen views to the site. It is possible that the proposed water tanks and toilet block will be visible from outdoor areas directly adjacent to the dwelling. The primary mitigating

factor in this case (and relevant to all residential properties) is elevation of the carpark well below existing surrounding ground level. The proposed 1.5m high, closed board, timber noise fence that is proposed long the common boundary will provide immediate screening of the carpark and in time the proposed amenity planting along the eastern site boundary will significantly obscure, if not completely screen views from this property. Being the proposed fence is consistent with that located on the property at 31 Tunnel Beach, I do not think that it will generate any notable adverse effects in and of itself. **Long-term visual effects on this property will be low.**

- 55 Although the carpark represents a notable change in the appearance of this discrete part of the local rural-residential landscape, for the reasons I have described the overall **visual effects on residential properties will be low.**
- 56 **Experiential effects will be low in degree** owing to the fact that the carpark is building on an existing activity which is familiar to users. It is providing for the currently ad hoc and (at times) overloaded carparking situation to be relocated and accommodated in a more effective and efficient manner.
- 57 While there will be a change in the current appearance of the site itself (i.e. pasture land to formed carpark) and the proposed planting will screen and obscure existing views from the carriageway to the south, the area at the end of Tunnel Beach Road will continue to be characterised by rural residential development and periodic influxes of parked vehicles.
- 58 This is not a fundamental change to the underlying experience and for visitors to the site the association between the provision of the carpark and purpose of their visit will mean they are unlikely to be sensitive to the proposed change the carpark represents.
- 59 Accepting that residents may have a higher level of sensitivity to this change, the resulting adverse effects are not significant in my assessment, and this is reflected in the lack of submissions on this matter.
- 60 On balance, adverse effects on rural-residential character and amenity resulting from the proposed carpark will be low and effects on natural character will be low moderate, largely the result of the extent of physical change being proposed at the carpark site.

Walking Track

- 61 The proposal represents a 'like for like' intervention in the landscape and although there will be an additional 400m of walking track, it will not

compromise the existing character or quality of the Tunnel Beach landscape to any significant degree.

- 62 The design seeks to create an un-obtrusive walking track that sits within the landscape, follows the contour of the land and takes advantage of existing farm tracks and flat areas to minimise landform modification.
- 63 While there may be some localised impacts on regenerating native vegetation there is opportunity to 'micro site' the track to avoid localised impacts and to reduce the extent of earthworks required.
- 64 While there will be some short-term effects resulting from construction of the track (e.g. vegetation removal and exposed earthworks) these can be adequately mitigated in the medium to long term via intermediary grassing and existing track deconstruction (i.e. gravel removal) and remediation planting. As a result, the potential physical impacts of the walking track can be managed to ensure that **long term physical effects on the coastal hill faces are of a low degree.**
- 65 The 2GP identifies the most notable physical aspects and features of the coastal landscape are the highly legible sandstone cliffs and the rare salt tolerant herb vegetation, which is located on the Tunnel Beach peninsula.
- 66 There will be no adverse effects on the legibility of the sandstone cliffs because the track is set well back from the cliff faces. Similarly, the proposed walking track will enhance the values of the rare herb fields where the proposed viewing platforms are intended as a means of reducing foot traffic on the Tunnel Beach peninsula.
- 67 Overall, the **adverse effects on the physical aspects of the coastal landscape will be very low**, with localised effects of the new walking track on vegetation and landform being countered by the avoidance of effects on the most valuable aspects of the Tunnel Beach landscape.
- 68 The **proposed walking track will generally enhance perceptual and experiential aspects** of the Tunnel Beach landscape by providing a safer and more accessible visitor experience as well as the proposed viewing areas 'opening up' new views and opportunities to experience and appreciate the coastal environment.
- 69 There is potential for adverse visual effects to arise during the construction period, while the track is being built and the presence of machinery, materials and stock piles can look 'raw'. These effects will be short lived.

- 70 There is also the potential for cumulative visual effects to arise as the result of both the existing track and proposed track being visible at the same time. This is most likely to occur when people are closer to the coastal cliff edge (e.g. viewing platforms 2 and 3) where they have views up the steep hill face to the north. The same can be said for vessels passing by, where views to the north are unimpeded and distance provides a broad and open view of the steep hill faces.
- 71 Deconstruction and remediation of the existing walking track will be an important factor in mitigating these potential visual effects. The removal of gravel, scarification, sowing of grass and planting as identified in the proposal will need to be undertaken and if it is successful then resulting **cumulative visual effects will be of a low degree.**
- 72 The role that the proposed viewing areas and interpretation information will have in educating people on the history and values associated with the coastal landscape and building their sense of understanding and connection with 'this place' is a **positive effect in terms of associative values.**
- 73 On balance, adverse effects on the natural character values of the steep hill slopes will be low and the most valuable aspects of the Tunnel Beach coastal landscape, being the sandstone cliffs and herb fields will be unaffected by the proposed walking track.

Section 42A report and proposed conditions

- 74 Effects on landscape values, natural character and rural residential amenity are canvassed in paragraphs 78 – 105 of the Section 42A report.
- 75 The report agrees with the findings in the LVA that was submitted with the Application and concludes that the effects of the proposal are no more than minor.
- 76 The assessment I have provided in this brief of evidence is also consistent with the assessment of effects provided in the original LVA and I agree that the effects on landscape character, including natural character and amenity values will be no more than minor.
- 77 The landscape-related conditions provided in the Section 42A report seeks the replacement of *Muehlenbeckia astonii* with *Hebe elliptica*. I support this recommended change because it maintains the underlying purpose of the revegetation plant mix proposed.

Response to submissions

- 78 Two submissions were received on the application, one neutral to the proposal by Emma Dorothy Towers and one in opposition to the proposal by Michael Varsanyi and Anya Durling.
- 79 Ms Tower's did not raise any submission points relative to landscape effects.
- 80 Mr Varsanyi and Ms Durling's submission does identify matters relating to natural character and rural amenity and that the proposed carpark will *"significantly diminish the high rural amenity of the area"*. (see paragraph 14 of their submission)
- 81 In terms of rural amenity, the submission speaks mainly to potential noise levels resulting from increased carpark capacity and associated vehicle movements and busyness that will bring. I rely on the evidence of Mr Trumper and Mr Shanks to assess traffic and noise effects respectively.
- 82 The potential loss of views (from amenity planting) and the change in character of the site from open pasture to a carpark are relevant landscape matters.
- 83 I have acknowledged that the proposal does represent a notable change in the current setting. However, in my assessment this change does not constitute a significant effect on existing rural-residential amenity for the reasons set out in paragraphs 43-60 of my evidence.
- 84 Further, I agree with the observation made in Paragraph 96 of the Section 42A report, where it recognises that existing visitor numbers (increasing from 38,000 visits in 2014 to 110,000 in 2019) are driving the need for the proposed carpark.
- 85 The impact that these visitors have on existing rural residential amenity must be considered in establishing the quality of the existing environment and subsequent adverse effects landscape character values.

Conclusion

- 86 On balance, the overall effects of the proposal (carpark and walkway) on landscape character, including natural character and rural-residential amenity will be low. This is owing to:
- (a) Adverse effects of the proposed **carpark** on rural-residential character and amenity will be low and effects on natural character will be low moderate; and

- (b) Adverse effects of the proposed **walking track** on the natural character values of the steep hill slopes will be low. This recognises positive experiential and associative effects and importantly that the most valuable aspects of the Tunnel Beach coastal landscape, being the sandstone cliffs and herb fields will be unaffected.



Wade Robertson

20 April 2022