

Before the Independent Commissioners

Under the Resource Management Act 1991

In the matter of a hearing on submissions on the proposed Te Tai o Poutini Plan

Topic 10B: Natural Features and Landscapes Hearing

Submitter: **Russell Robinson** and **Brunner Builders Limited (S515)**

Statement of Evidence of Russell Robinson

12 February 2024

- 1 My name is Russell Robinson. I am the sole director of Brunner Builders Limited (**Brunner Builders**), a building company which I started in 2010.
- 2 I made a submission on the proposed Te Tai o Poutini Plan (**TTPP**) to support rezoning land to the north of Moana township owned by Brunner Builders from Settlement and Rural Residential Precinct to a mix of urban/residential (such as Settlement Zone), village centre/commercial and light industrial zoning. This land is bordered by Arnold Valley Road (east), existing residential (south) and the Moana Scenic Reserve to the (north and west).
- 3 The land is shown below in yellow (and legally described as Lot 1 DP 2820 and Part RS3806).



- 4 For several years Brunner Builders has been investigating to rezone the land for residential development and has been taking advice from numerous technical consultants. I have spent a considerable amount of time and money taking advice and preparing the rezoning application. There is a demand for housing in Moana and very limited land to develop. Prior to lodging a private plan change application (lodged in August 2022), the TTPP was notified. The private plan change has since been put on hold due to this process.
- 5 The TTPP notified an ONL boundary which is inconsistent with the site-specific assessment that was completed for the land by the landscape architect, ecologist

and urban design consultants. These assessments consider the land as a whole, and in the context of the proposed rezoning, they also assessed the landscape and ecological value of the areas relevant to the ONL boundary. This analysis will be presented as part of the rezoning hearing.

- 6 For the purposes of this hearing, I seek that the ONL boundary should be amended to be removed in its entirety from this land (and only include the public reserve land next door). Alternatively, should an ONL boundary be included on the land it should reflect the site-specific assessment and be as set out below:



Figure 1: Red lines indicate area from the Brunner Builders land that could be included in the ONL boundary.

- 7 The red lines above include the areas of tall rimu and kahikatea ('mature podocarp forest remnants') in the north-west and south-west corners of the land in the ONL, and excludes the remainder of the land. The remainder of the land doesn't have any similarities to the Moana Reserve. Most of the land is covered in grass, with some areas of bush and shrubs. The bush/shrub areas are a mix of natives and gorse, and the difference between those areas and the areas of tall trees in the north-west/south-west is obvious when you are viewing the property on the ground. The following photos (taken by experts as part of the private plan change request) show the difference.



Trees in the north-west corner of the land, including some mature podocarp. This area could be part of the ONL.



View looking south across the land from the northern part, showing mainly grasses and shrubs.



View looking north from the northern part of the land, the trees in the background part of the reserve to the north, with the grasses, shrub and a single Kahikatea inside my land.



Tall trees in the south-west corner (rimu and kahikatea), could be part of the ONL.



View from standing in one of the residential properties to the south of the land (8 Harper Place), looking west across the bush/shrub area toward the mature forest in the south-west corner. Gorse within the bush/shrub area.



View from 8 Harper Place, looking north across the bush/shrub area with the mature forest in the south-west corner visible to the west. Gorse clearly visible within the bush/shrubs.



View from 8 Harper Place, looking east across the bush/shrub area with identifiable gorse and exotic species.

- 8 In addition, I have a land use resource consent (LU3163-23) and building consent (88616040PG) to relocate four existing houses and garages onto the land. These consents relate to the southern bush/shrub area that is proposed as ONL in the Addendum Report.

Conclusion

- 9 The areas that have been proposed as ONL across my land, apart from the north-west/south-west corners, cannot reflect 'outstanding' natural areas as they are generally grass, bush and shrub – including exotic species and gorses. Aerial images do not distinguish between the types of vegetation on the ground.

Russell Robinson

12 February 2024