

**BEFORE AN INDEPENDENT HEARINGS PANEL  
APPOINTED BY THE TE TAI O POUTINI JOINT COMMITTEE**

**Under the** Resource Management Act 1991 (RMA)  
**In the matter** of the Proposed Te Tai o Poutini Plan  
Topic: Coastal Environment Part B

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**EVIDENCE IN CHIEF OF BRIDGET GILBERT ON BEHALF OF TE TAI O POUTINI  
COMMITTEE**

**LANDSCAPE**

**2 September 2024**

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## 1. INTRODUCTION

1.1 My full name is Bridget Mary Gilbert.

1.2 I am a Landscape Architect and Director of Bridget Gilbert Landscape Architecture Ltd, Auckland. I hold a Bachelor of Horticulture from Massey University and a postgraduate Diploma in Landscape Architecture from Lincoln College. I am an associate of the Landscape Institute (UK) and a registered member of the New Zealand Institute of Landscape Architects.

1.3 I have practised as a Landscape Architect for almost 30 years in both New Zealand and England and I am currently an Independent Hearing Commissioner for Auckland Council.

1.4 During my career, I have been involved in a range of work in expert landscape evaluation, assessment and advice throughout New Zealand, including:

- (a) Landscape assessment in relation to Regional and District Plan policy;
- (b) Conceptual design and landscape assessment of infrastructure, rural, and coastal developments; and
- (c) Detailed design and implementation of infrastructure, rural, and coastal projects.

1.5 Of more specific relevance to the Coastal Environment Part B Topic, I have experience in the evaluation and identification of the Coastal Environment (**CE**), areas of High Natural Character (**HNC**) and areas of

Outstanding Natural Character (**ONC**) (and other landscape overlays) in Aotearoa New Zealand, having:

- (a) undertaken a peer review of the Tasman District CE and Natural Character Assessment (prepared by Boffa Miskell Limited);
- (b) undertaken a peer review of the Waikato Region CE and Natural Character Assessment (prepared by Boffa Miskell Limited); and
- (c) participated in several council and Environment Court hearing processes concerning the methodology, evaluation and mapping of CE and HNC/ONC overlays in Northland, Auckland, the Hauraki Gulf Islands, and Thames-Coromandel District.

**1.6** This work has included providing advice to Councils, iwi groups, and private clients. It has also involved reviewing Coastal Environment and Natural Character Assessments prepared by Stephen Brown for other Councils throughout New Zealand (e.g. Auckland, Thames Coromandel), which has given me a good understanding of how Mr Brown goes about such work.

## **2. CODE OF CONDUCT**

**2.1** I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise and I have not omitted material facts known to me that might alter or detract from my evidence.

### 3. SCOPE OF EVIDENCE

#### 3.1 My evidence will address the following matters:

- (a) The appropriateness of the methodology that underpins the assessment and mapping of the coastal environment and natural character areas across the districts, from an expert landscape perspective.
- (b) Submissions in relation to the coastal environment mapping.
- (c) Submissions in relation to the High Natural Character and Outstanding Natural Character overlay areas.

#### 3.2 The documents relied on in the preparation of my evidence are as follows:

- (a) West Coast Natural Character Study Schedules, Maps and Photographs, dated 2013, prepared by Brown NZ Ltd. (**2013 Brown CE and HNC/ONC Mapping and HNC/ONC Schedules**).
- (b) West Coast Landscape & Natural Character Study 2012 and 2013: Explanation of Assessment Methodologies, prepared by Brown NZ Ltd, dated March 2021 (**2021 Brown Methodology Report**).
- (c) West Coast Landscape Study: Review of Outstanding Natural Landscapes & Areas of High & Outstanding Natural Character, prepared by Brown NZ Ltd, dated March 2022 (**Brown 2022 HNC and ONC Mapping Review Report**).
- (d) Revised West Coast HNC and ONC Maps, prepared by Brown NZ Ltd, dated 2022 (**Brown 2022 HNC and ONC Mapping**, resulting from the Brown 2022 HNC and ONC Mapping Review Report).

- (e) TTPP Section 32 Evaluation: Report Five (Natural Environment Values – Ngā Uara Taiao Aotūroa; Ecosystems and Biodiversity – Ngā Pūnaha Rauropi me te Kanorau Koiora; Natural Features and Landscapes – Ngā Āhua me ngā Horanuku Aotūroa; Coastal Environment – Te Taiao o te Takutai; Natural Character and Water), prepared by Council (**s32 Report 5**).
- (f) TTPP GIS CE and Natural Character mapping resource (which comprises updated CE and HNC / ONC Mapping (**August 2024 GIS CE and Natural Character mapping**)). This mapping was prepared in August 2024 and comprises a more accurate, legible, and ‘accessible’ (or ‘plan user friendly’) version of the CE, HNC and ONC mapping. The August 2024 GIS CE and Natural Character mapping incorporates the amendments made to the CE, HNC and ONC mapping by Mr Brown in March 2002 for part of the study area (and incorporated into the Notified TTPP CE, HNC and ONC mapping), along with a second review of the CE, HNC and ONC mapping for entire study area undertaken by Mr Brown in September 2022.
- (g) Submissions in relation to the CE, HNC, and ONC mapping.
- (h) Draft 42A Report.

**3.3** I am familiar with the West Coast districts generally, having visited the area on a number of occasions. A specific site visit was made in mid-January 2024 to review location-specific CE, HNC, and ONC matters.

#### 4. SUMMARY OF EVIDENCE

##### CE Assessment and Mapping

- 4.1** In summary (and for the reasons outlined in the main body of my evidence), it is my opinion that the methodology underpinning the CE mapping in the August 2024 GIS CE mapping is generally sound.
- 4.2** Further, it is my view that the August 2024 GIS CE mapping is generally preferred over the Notified TTPP CE mapping. This is due to the more comprehensive nature of the evaluation and the considerably finer grained aerial photography resources that have informed the August 2024 CE mapping, resulting in a far higher degree of accuracy (particularly when compared to the 'original' 2013 work that was mapped using LINZ Topo maps only).
- 4.3** The main body of my evidence describes seven locations where I consider refinement of the CE mapping is required.
- 4.4** **Appendix B** of my evidence includes my recommendations in response to CE mapping related submissions.
- 4.5** In response to a request from Ms Easton (the s42A Report author), I have also considered the potential landscape implications of removing the CE mapping in urban zoned parts of the districts, namely: Westport, Greymouth, and Hokitika. I note that this matter is raised, to at least some extent, in OS#: 151; 213; 360; 509; and 560.
- 4.6** While there are inevitably parts of these urban areas that technically form part of the CE, it is my experience that landscape-related CE policy provisions in district and regional plans typically focus on managing effects in relation to the non-urban parts of the CE. This makes sense to me as a landscape architect, as the natural character of urban landscapes tends to rate well towards the lower end of the natural character

spectrum. Put another way, the management of the natural character of urban CE areas is typically not a key landscape issue.

- 4.7** This means that it is appropriate, from a landscape perspective, to exclude the CE overlay from the larger-scaled, urban parts of the districts i.e. Westport, Greymouth and Hokitika. In those instances, the excluded area corresponds to the extent of urban zoned land.
- 4.8** There is also a logic (from a landscape perspective), to exclude land that was historically urban zoned but has been 'down zoned' to a rural zoning for natural hazard reasons, such as the Snodgrass Road area to the east of Westport.
- 4.9** For completeness and from a landscape perspective, the relatively small scale of coastal settlement type areas such as Karamea, Hector, Granity, Punakaiki, Gladstone, Camerons, Ōkārīto and Hannahs Clearing is such that it is appropriate to include these areas with the CE. This is because these areas typically display natural character values that rate as being at towards the middle, or even higher, on the natural character spectrum.

#### **HNC and ONC Assessment and Mapping**

- 4.10** In summary (and for the reasons outlined in the main body of my evidence), it is my opinion that, at a very general level, the methodology underpinning the HNC and ONC mapping in the August 2024 GIS HNC/ONC mapping is credible.
- 4.11** Clearly, there are a number of reasonably large-scale changes to the mapped extent of the HNC and ONC areas between the Notified TTPP HNC/ONC mapping and the August 2024 GIS HNC/ONC mapping. This includes both increases to the mapped areas, and reductions in the mapped areas. I understand that this is the consequence of the considerably more comprehensive (re-)evaluation undertaken by Mr Brown in his September 2022 review, which included substantial



amendments to the CE mapping in places, and 'flow on' consequences for any related mapped areas of HNC and ONC (e.g. the coastline south of Charleston).

- 4.1 Having reviewed both the TTPP Notified HNC/ONC mapping and the August 2024 GIS HNC/ONC mapping, it is my opinion that from a technical perspective, both mapping sets present difficulties in terms technical accuracy.
- 4.2 That said, the August 2024 GIS HNC/ONC mapping is generally preferred over the Notified TTPP HNC/ONC mapping due to the more comprehensive nature of the evaluation that informed this more recent mapping dataset, including the finer grained aerial photography resources employed (particularly when compared to the 'original' 2013 work that was mapped using LINZ Topo maps only).
- 4.3 **Appendix C** of my evidence lists the numerous locations where I consider refinement of the HNC and/ONC mapping is required from an expert landscape perspective.
- 4.4 **Appendix D** of my evidence includes my recommendations in response to HNC mapping related submissions and **Appendix E** of my evidence includes my recommendations in response to ONC mapping related submissions.

#### HNC and ONC Schedules

- 4.5 It is my understanding that the Notified TTPP HNC and ONC Schedules were prepared by Mr Brown in 2013 and relate to the HNC and ONC mapping prepared by Mr Brown at that time.
- 4.6 From a technical perspective, at the time of notification, the HNC and ONC Schedules should have been reviewed to check that the content aligned with the 'partially updated' Notified TTPP HNC and ONC mapping.

**4.7** As explained earlier, since that time there has been a full review of the HNC and ONC mapping (captured in the August 2024 GIS mapping dataset), and my evidence recommends that further refinement is required (as outlined in **Appendix C**).

**4.8** For these reasons, it is recommended that as part of the review of the August 2024 GIS CE, HNC and ONC mapping, the corresponding HNC and ONC Schedules are carefully checked and updated as required, to identify the key natural character values of the relevant area.

## **5. COASTAL ENVIRONMENT METHODOLOGY**

**5.1** The 2021 Brown Report explains the background to the CE mapping and advises that six key considerations drove the 2013 CE mapping:

*Areas that are physically linked to the CMA:*

- a. that are directly subject to wave action and tidal inundation / movement and which contain / define the inter-tidal margins of the CMA;*
- b. coastal drainage systems, including catchments and headwaters that feed directly into the CMA; and*
- c. landforms and vegetation cover that are directly affected / modified by exposure and proximity to the CMA – through wind action, wave action and salt exposure.*

*Areas whose character is substantially defined by their proximity to the CMA:*

- d. areas within which the CMA is a dominant to significant visual entity [sic];*
- e. locations whose landscape character and amenity is clearly influenced by proximity to, and a sense of connection with, the CMA; and*
- f. locations within which items of cultural and historic heritage are found that are linked to, or within the CMA.*

- 5.2** This method is reiterated in the Brown 2022 Report.
- 5.3** For completeness, I have assumed that the meaning of item (d) above relates to areas where the CMA forms a dominant or significant visual element.
- 5.4** I confirm that these key principles are sound and generally align with the thinking set out in TTatM paragraph 9.19 as to what the coastal environment comprises.
- 5.5** I also consider that the commentary in the 2021 Brown Report, with respect to where the influence of the six factors is less easily defined, is beneficial. This explains how Mr Brown has balanced the influence of the CMA in shaping landscape character in parts of the district that are located at some distance from the coastline, yet ‘contained’ by the first dominant coastal ridgeline.
- 5.6** However, I note that more recently there has been acknowledgement that tāngata whenua knowledge can be relevant to the delineation of the CE.
- 5.7** The 2021 Brown Methodology Report explains that very little information was available in 2012 about tāngata whenua values. I note that the Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu submission (OS#620) does not appear to raise any concerns with respect to the mapping of the Coastal Environment.
- 5.8** Consistent with the approach recommended in the Landscapes Topic, in my opinion it would be beneficial that the Sites of Significance to Māori work is integrated with any further CE mapping refinement work; however, I am uncertain whether there is scope for that to be addressed.

## 6. COASTAL ENVIRONMENT MAPPING

- 6.1 It is my understanding that the original CE linework mapping prepared by Mr Brown in 2013, was prepared on hard copy (paper) NZMS Topo Maps (with 20m contours) plans (**CE Topo mapping**). No aerial photography resources were referenced at that time.
- 6.2 Mr Brown provided a partial review of the CE Topo mapping in March 2022 by way of updated hard copy mapping on aerial photographs, which was integrated into the Notified TTPP CE mapping.
- 6.3 Mr Brown then provided a full review of the CE (and HNC/ONC) mapping in September 2022, again by way of hard copy mapping on aerial photographs. This material was integrated into the August 2024 GIS CE and Natural Character mapping.
- 6.4 At both the notification stage, and more recently in the August 2024 GIS mapping, Mr Brown's hard copy mapping was digitised by the Council project team. It is inevitable that this 'translation' of hard copy mapping to a digital format will generate some errors, and in this instance, it would appear that some sections of the CE mapped by Mr Brown were completely excluded from the Notified TTPP CE mapping version.
- 6.5 Clearly, there are also a number of large-scale changes to the mapped extent of the CE between the Notified TTPP CE mapping and the August 2024 CE mapping. I understand that this is the consequence of the considerably more comprehensive (re-)evaluation undertaken by Mr Brown in his September 2022 review.
- 6.6 A review of the changes to the CE mapping between the Notified TTPP and August 2024 versions is attached in **Appendix A**.

**6.7** In summary, it is my opinion that the methodology underpinning the CE mapping in the August 2024 GIS CE mapping is generally sound.

**6.8** Further, it is my view that the August 2024 GIS CE mapping is generally preferred over the Notified TTPP CE mapping. This is due to the more comprehensive nature of the evaluation and the considerably finer grained aerial photography resources that have informed the August 2024 CE mapping, resulting in a far higher degree of accuracy (particularly when compared to the 'original' 2013 work that was mapped using LINZ Topo maps only).

**6.9** The exceptions to this recommendation are as follows:

- (a) The northern end of the coastline, where the August 2024 CE mapping has omitted any CE mapping in this part of the district. The Notified TTPP CE mapping is generally preferred here.
- (b) The August 2024 CE mapping along the coastline between Seaview and Donoghues, where minor refinement of the CE mapping in the vicinity of Adair Road, Lake Tarleton, and Sandstone Creek is required to reflect the landform patterning of the CE.
- (c) The August 2024 CE mapping along the coastline between Donoghues and Abut Head, where minor refinement of the CE mapping in the vicinity of the Wanganui River is required to make better sense of the relationship of the CE linework to the river corridor.
- (d) The August 2024 CE mapping along the coastline between Abut Head and Makawhio Point, where minor refinement of the CE mapping in the vicinity of the Waiho River and Docherty Creek is required to make better sense of the relationship of the CE linework to the river/creek corridor.

- (e) The August 2024 CE mapping along the coastline between Makawhio Point and Arnott Point, where reconsideration (and likely expansion) of the CE mapping is required, in the vicinity of Lake Kini (east of Bruce Bay), the Mahitahi River corridor and Bruce Bay, and Micmac Creek (west of Bruce Bay).
- (f) The August 2024 CE mapping along the coastline between Arnott Point and Jackson Head, where reconsideration (and likely expansion) of the CE mapping is required, in the vicinity of Tawharekiri Lakes, the swamplands to the north and south of the Okura River, the swamp dominated hinterland of Hannahs Clearing, and the swamp land in the vicinity of Mt Mclean.
- (g) The southern end of the coastline between Jackson Head and Awarua Point, where there appear to be multiple errors in the notified TTPP CE mapping and the August 2024 CE mapping. For this reason, it is recommended that the extent of the CE between Jackson Head to Awarua Point is re-examined and mapped.

## **7. SUBMISSIONS IN RELATION TO THE CE MAPPING**

- 7.1** **Appendix B**, attached, comprises a table listing each of the submissions related to the CE mapping along with my comments and recommendations.
- 7.2** Ms Easton has also asked me to comment on the potential landscape implications of removing the CE mapping in urban zoned parts of the districts, namely: Westport, Greymouth, and Hokitika. I note that this matter is raised, to at least some extent, in OS#: 151; 213; 360; 509; and 560.
- 7.3** While there are inevitably parts of these urban areas that technically form part of the CE, it is my experience that landscape-related CE policy provisions in district and regional plans typically focus on managing

effects in relation to the non-urban parts of the CE. This makes sense to me as a landscape architect, as the natural character of urban landscapes tends to rate well towards the lower end of the natural character spectrum. Put another way, the management of the natural character of urban CE areas is typically not a key landscape issue.

**7.4** This means that it is appropriate, from a landscape perspective, to exclude the CE overlay from the larger-scaled, urban parts of the districts i.e. Westport, Greymouth and Hokitika. In those instances, the excluded area corresponds to the extent of urban zoned land.

**7.5** There is also a logic (from a landscape perspective), to exclude land that was historically urban zoned but has been 'down zoned' to a rural zoning for natural hazard reasons, such as the Snodgrass Road area to the east of Westport.

**7.6** For completeness and from a landscape perspective, the relatively small scale of coastal settlement type areas such as Karamea, Hector, Granity, Punakaiki, Gladstone, Camerons, Ōkārīto and Hannahs Clearing is such that it is appropriate to include these areas with the CE. This is because these areas typically display natural character values that rate as being at towards the middle, or even higher, on the natural character spectrum.

## **8. EVALUATION AND MAPPING OF AREAS OF HIGH AND OUTSTANDING NATURAL CHARACTER**

### **Scale of Assessment**

**8.1** It is noted that the 2013 HNC and ONC Mapping and Schedules form a 'stand-alone' document, rather than part of a 'full' natural character study of the districts in which the natural character of all of the area (i.e. not just areas of HNC and ONC areas) is evaluated.

- 8.2** It is noted that many district and regionwide natural character assessments throughout the country are similarly structured to focus on identifying areas of high and outstanding natural character only (for example: Auckland, TCDC). I understand this to be a pragmatic response, although note that more recent best practice would typically require the CE to be divided up into ‘bite sized’ areas, with the natural character values identified at an ‘area scale’.
- 8.3** This means that when the approach used in the West Coast is relied upon, it is especially critical that the thresholds for ‘high’ and ‘outstanding’ natural character are technically robust, and the evaluation and identification of the HNC and ONC areas is tested via an iterative process in which the landscape assessor ‘steps back’ to: consider the natural character values ‘in the round’. These matters are discussed shortly under the discussion of the ‘landscape assessment process’.
- 8.4** In addition, expert peer review is typically required where such an approach is adopted.
- 8.5** Although a peer review did not inform the notified HNC and ONC Mapping and Schedules, this Landscape Report is, in essence, a peer review.

### **Natural Character ‘Factors’**

- 8.6** A series of ‘factors’ (or criteria) are listed in the HNC and ONC Schedules, grouped under two ‘natural character’ dimension headings’: Biophysical Characteristics; and Perceptual Values. The 2021 Brown Methodology Report explains that it is these factors that have guided the evaluation of natural character.
- 8.7** While some language has been modified over the intervening time (and in TTatM), the headings and factors align reasonably well with the sorts of characteristics and values that should be considered in an assessment of natural character values as outlined in Policy 13(2) of the NZCPS 2010



and TTatM. Put another way, the range of matters referenced as informing the natural character assessment (and more specifically, listed in the HNC and ONC Schedules) adequately 'cover the field' (subject to the comments below in relation to Tāngata Whenua Values).

- 8.8** More recently, there has been acknowledgement that tāngata whenua knowledge can be relevant to the identification of HNC and ONC areas.
- 8.9** The 2021 Brown Methodology Report explains that very little information was available in 2012 about tāngata whenua values. I note that the Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu submission (OS#620) does not appear to raise any concerns with respect to the mapping of the High and Outstanding Natural Character overlay areas or the wording of the relevant schedules.
- 8.1** Consistent with the approach recommended in the Landscapes Topic, in my opinion it would be beneficial that the Sites of Significance to Māori work is integrated with any further HNC and ONC mapping and schedules work; however, I am uncertain whether there is scope for that to be addressed.

#### **'Other Expert' Disciplines input into Natural Character Assessment**

- 8.2** No specific 'other expert' disciplines were involved in the assessment process that informed the evaluation and consequential mapping of the notified or August 2024 HNC and ONC areas.
- 8.3** While such input is beneficial, it is not uncommon for natural character assessments in Aotearoa New Zealand to be undertaken in this way, with the landscape expert relying on published material such as the Geopreservation Inventory, District Plan mapping of SNAs, tourist publications, and LINZ Topo mapping and the like (along with field work) to assist their evaluation. I understand this to be the approach adopted by Brown NZ Ltd.

## 'High' and 'Outstanding' Thresholds

8.4 The 2021 Brown Methodology Report cites the paucity of Environment Court decisions in which the threshold for 'high' and 'outstanding' natural character at the time of the 2013 work. Mr Brown goes on to discuss relevant comments from a 2012 DoC Workshop (which he was a participant of), tasked with (amongst other matters) providing guidance as to what the terms 'outstanding natural character' and 'high natural character' mean.

8.5 The 2021 Brown Methodology Report then sets out the thresholds for natural character applied in the West Coast study as follows:

*Areas of **Outstanding Natural Character** should equate with being 'close to wholly natural' – although it is not realistic to expect that any part of the coastal environment will be pristine.*

*Areas of **High Natural Character** should display a predominance of natural features, elements and patterns [in terms of their biophysical structure and character, perceived naturalness and related associative values – as per Policy 13(2)] – although they are also likely to contain areas that are clearly subject to human modification, e.g. farming, roading or other activities and structures.*

*Areas of '**Other**' Levels of Natural Character are likely to be much more variable – from those containing sizeable remnant features or elements (e.g. headlands, stands of coastal vegetation) to those – like port areas – in which the only natural element is the sea.*

8.6 I consider this approach to be technically sound.

## Natural Character Assessment Process

8.7 Closely linked to the correct application of the thresholds for 'high' and 'outstanding' natural character is the assessment process adopted by the assessor.

**8.8** The s32 Report 5 explains the process of expert landscape input into the notified TTPP HNC and ONC Mapping and Schedules as follows:

**Table 1:** Natural Character Assessment Process

Stage:	Process:
1.	<p><b>Field Work – Mapping of ‘Sufficiently Natural’ Areas:</b></p> <p>Use of field work and aerial imagery to map an indicative coastal environment &amp; river / lake / wetland margins</p> <p>NB the 2021 Brown Methodology Report explains that while river/lake and wetland areas were originally mapped in 2012 (in accordance with RMA s6(a)), the brief was changed in 2013 to focus the natural character assessment on the parts of the districts that coincide with the coastal environment only.</p>
2.	<p><b>Draft Mapping of Natural Character Areas:</b></p> <p>Use of field work and aerial imagery to subdivide the coastline &amp; freshwater catchments in <i>[sic]</i> Natural Character Areas based on their:</p> <ul style="list-style-type: none"> <li>• Water types (sea; lakes / rivers / wetlands)</li> <li>• Landforms</li> <li>• Vegetation Cover</li> <li>• Land Uses &amp; Activities</li> </ul>
3.	<p><b>Evaluation of Each Natural Character Area:</b></p> <p>Detailed evaluation of each candidate landscape ‘on the ground’ employing the criteria set out overleaf</p>
4.	<p><b>Evaluation of Each Natural Character Area:</b></p> <p>Comparative evaluation of each Natural Character Areas to evaluate the thresholds for High &amp; Outstanding Natural Character Areas</p>
5.	<p><b>Overall Evaluation of Each Natural Character Area:</b></p> <p>Re-assessment of each NC Area to identify Areas of High &amp; Outstanding Natural Character</p>
6.	<p><b>Review &amp; Refinement:</b></p> <p>Review of the draft ONC and HNC Areas in response to feedback from the Regional and District Councils - leading to the ‘downgrading’ of some draft ONC Areas</p>

**8.9** Importantly, the assessment process above includes stepping back and considering the natural character areas ‘in the round’ and in a relative sense, which (as explained earlier), is critical to the correct and consistent application of thresholds for naturalness and outstanding-ness.

- 8.10** Further, the review and refinement process outlined above is an important ‘sense check’ exercise in which the broader Council team queried aspects of the draft HNC and ONC work, which typically adds a helpful layer of local knowledge to the process.
- 8.11** As explained earlier, field work has informed this Landscape Report. Consistent with landscape assessment best practice for a district-wide evaluation of HNC and ONC, this has not involved detailed site visits, but rather: ‘overview field work’ of the districts’ landscapes as accessed by public road (and in some instances walking tracks and cycling trails); and more focussed ‘location field work’ where public submissions (in particular), suggest that refinement of the mapping may be required.
- 8.12** From this field work (and subject the more detailed mapping comments that follow), it is my opinion that the fundamental (or general) findings of the 2022 Brown NZ Ltd work in relation to HNC and ONC areas, is credible.
- 8.13** I also note that under the August 2024 GIS HNC/ONC mapping:
- (a) approximately 0.61% of the districts are identified as HNC;
  - (b) approximately 6.19% of the districts are identified as ONC; and
  - (c) approximately 87% of the ONC areas coincide with publicly owned land.

### **HNC and ONC Mapping**

- 8.14** As a starting point, natural character mapping best practice typically sees the boundaries of the HNC and ONC areas generally aligned with ‘landscape’ boundaries such as the edges of coastal landforms (e.g. dunes, coastal flats, the upper edge of stream banks) and/or the edges of indigenous vegetation features.
- 8.15** In terms of the ‘process’ of mapping natural character areas, , it is my understanding that (like the CE mapping work), the original HNC and ONC

linework mapping prepared by Mr Brown in 2013, was prepared on hard copy (paper) NZMS Topo Maps (with 20m contours) plans. No aerial photography resources were referenced by Mr Brown at that time.

**8.16** Mr Brown provided a partial review of the HNC and ONC mapping in March 2022 by way of updated hard copy mapping on aerial photographs. This mapping was integrated into the Notified TTPP HNC and ONC mapping.

**8.17** Mr Brown then provided a full review of the HNC and ONC mapping in September 2022, again by way of hard copy mapping on aerial photographs. This material was integrated into the August 2024 GIS HNC/ONC mapping.

**8.18** At both the notification stage, and more recently in the August 2024 GIS HNC/ONC mapping, Mr Brown's hard copy mapping was digitised by the Council project team. It is inevitable that this 'translation' of hard copy mapping to a digital format will generate some errors.

**8.19** Clearly, there are a number of reasonably large-scale changes to the mapped extent of the HNC and ONC areas between the Notified TTPP HNC/ONC mapping and the August 2024 GIS HNC/ONC mapping. This includes both increases to the mapped areas, and reductions in the mapped areas. I understand that this is the consequence of the considerably more comprehensive (re-)evaluation undertaken by Mr Brown in his September 2022 review, which included substantial amendments to the CE mapping in places and 'flow on' consequences for any related mapped areas of HNC and ONC (e.g. the coastline south of Charleston).

**8.20** Having reviewed both the TTPP Notified HNC/ONC mapping and the August 2024 GIS HNC/ONC mapping, it is my opinion that from a technical

perspective, both mapping sets present difficulties in terms technical accuracy.

- 8.21** That said, the August 2024 GIS HNC/ONC mapping is generally preferred over the Notified TTPP HNC/ONC mapping due to the more comprehensive nature of the evaluation that informed this more recent mapping dataset, including the finer grained aerial photography resources employed (particularly when compared to the 'original' 2013 work that was mapped using LINZ Topo maps only).
- 8.22** However, there are, in my opinion, numerous exceptions to this observation where I consider refinement or even, re-examination of the August 2024 GIS HNC and/or ONC mapping is required. **Appendix C** attached provides a list of those locations and brief commentary on the re-evaluation that is required.

#### HNC and ONC Schedules

- 8.23** It is my understanding that the Notified TTPP HNC and ONC Schedules were prepared by Mr Brown in 2013 and relate to the HNC and ONC mapping prepared by Mr Brown at that time.
- 8.24** From a technical perspective, at the time of notification, the HNC and ONC Schedules should have been reviewed to check that the content aligned with the 'partially updated' Notified TTPP HNC and ONC mapping.
- 8.25** As explained earlier, since that time there has been a full review of the HNC and ONC mapping (captured in the August 2024 GIS mapping dataset), and my evidence recommends that further refinement is required (as outlined in **Appendix C**).
- 8.26** For these reasons, it is recommended that as part of the review of the August 2024 GIS HNC and ONC mapping, the corresponding HNC and ONC

Schedules are carefully checked and updated as required, to identify the key natural character values of the relevant area.

**9. LOCATION SPECIFIC SUBMISSIONS IN RELATION TO THE HNC MAPPING**

**9.1** **Appendix D** attached, comprises a Table listing each of the submissions related to the HNC mapping along with my comments and recommendations.


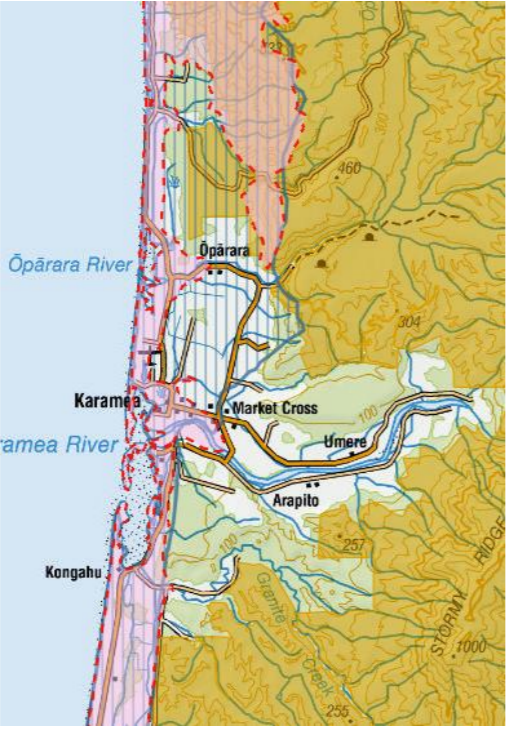
**10. LOCATION SPECIFIC SUBMISSIONS IN RELATION TO THE ONC MAPPING**

**10.1** **Appendix E** attached, comprises a Table listing each of the submissions related to the ONC mapping along with my comments and recommendations.



**Bridget Gilbert**


**Date: 2 September 2024**



## Appendix A: Review of the Changes to the CE Mapping Between the Notified TTPP and August 2024 Versions


General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
<p>Kahurangi National Park coastline north of Mid Point.</p>	<p>CE mapping was included in the Notified CE mapping (blue hatching and linework) but excluded in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE north of Mid Point is correctly identified in the Notified TTPP mapping.</p>	<p>Rely on the Notified TTP CE mapping in this location.</p>
<p>Karamea hinterland</p>	<p>The extent of the CE mapping across the Karamea hinterland shown in the Notified CE mapping (blue hatching and linework) has been reduced in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the Karamea hinterland is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>







General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Little Wanganui Head to Hector	<p>The extent of the CE mapping along the stretch of coastline between Little Wanganui Head and Hector shown in the Notified CE mapping (blue hatching and linework) has been expanded in places (including, to address all of the coastline) and reduced in others, in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Little Wanganui Head and Hector is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>
Hector to Cape Foulwind	<p>The extent of the CE mapping along the stretch of coastline between Hector and Cape Foulwind shown in the Notified CE mapping (blue hatching and linework) has been expanded in places (including, to address all of the coastline) and reduced in others, in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Hector and Cape Foulwind is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>



General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Cape Foulwind to Kaipakati Point	<p>The extent of the CE mapping along the stretch of coastline between Cape Foulwind and Kaipakati Point shown in the Notified CE mapping (blue hatching and linework) has been expanded in places (including, to address all of the coastline) and reduced in others, in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Cape Foulwind and Kaipakati Point is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>


General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Kaipakati Point to Dolomite Point	<p>The extent of the CE mapping along the stretch of coastline between Kaipakati Point and Dolomite Point shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Kaipakati Point and Dolomite Point is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>
Dolomite Point to Cobden	<p>The extent of the CE mapping along the stretch of coastline between Dolomite Point and Cobden shown in the Notified CE mapping (blue hatching and linework) has been expanded along much of its length in the August 2024 mapping (pink overlay and red linework). There are some minor reductions in places.</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Dolomite Point and Cobden is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>

General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Cobden to Camerons	<p>The extent of the CE mapping along the stretch of coastline between Cobden and Camerons shown in the Notified CE mapping (blue hatching and linework) has been appreciably reduced along much of its length in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Cobden and Camerons is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>

General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Camerons to Seaview	<p>The extent of the CE mapping along the stretch of coastline between Camerons and Seaview shown in the Notified CE mapping (blue hatching and linework) has been reduced in places (e.g. north of Chesterfield, north of the Arahura River), and expanded in others (e.g. Awatuna and Arahura hinterlands) in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Camerons and Seaview is correctly identified in the August 2024 mapping.</p>	<p>Rely on the August 2024 CE mapping in this location.</p>
Seaview to Donoghues	<p>The extent of the CE mapping along the stretch of coastline between Seaview and Donoghues shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework). There is a small reduction near Camp Creek.</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the very general extent of the CE throughout the coastline between Seaview and Donoghues is correctly identified in the August 2024 mapping, although it would appear that the configuration of the inland fingers of CE in the vicinity of Adair Road, Lake Tarleton and Sandstone Creek requires minor modification to reflect the landform patterning of the CE.</p>	<p>Rely on the August 2024 CE mapping in this location with the exception of minor corrections in the vicinity of Adair Road, Lake Tarleton and Sandstone Creek to reflect the landform patterning of the CE.</p>

General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Donoghues to Abut Head	<p>The extent of the CE mapping along the stretch of coastline between Donoghues and Abut Head shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework). This includes addressing stretches of the coastline where no CE was identified in the notified CE mapping.</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Donoghues and Abut Head is correctly identified in the August 2024 mapping. The only exception to this is the mapping of the CE in the vicinity of the Wanganui River where minor adjustment is recommended to make better sense of the relationship of the CE linework to the river corridor.</p>	<p>Rely on the August 2024 CE mapping in this location with the exception of minor corrections in the vicinity of the Wanganui River to make better sense of the relationship of the CE linework to the river corridor.</p>
Abut Head to Makawhio Point	<p>The extent of the CE mapping along the stretch of coastline between Abut Head and Makawhio Point shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework).</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the general extent of the CE throughout the coastline between Abut Head and Makawhio Point is correctly identified in the August 2024 mapping. The exceptions to this relate to: the configuration of the inland extent in the vicinity of the Waiho River and Docherty Creek where minor adjustments are recommended to make better sense of the relationship of the CE linework to the river/creek corridor; and the CE mapping in the vicinity of Hunt Beach where no CE is mapped which is technically incorrect. The Notified TTPP CE mapping is preferred in this location.</p>	<p>Rely on the August 2024 CE mapping in this location with the exception of minor corrections in the vicinity of the Waiho River and Docherty Creek to make better sense of the relationship of the CE linework to the river/creek corridor. Rely on the Notified TTPP CE mapping in the vicinity of Hunt Beach.</p>

General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Makawhio Point to Arnott Point	<p>The extent of the CE mapping along the stretch of coastline between Makawhio Point and Arnott Point shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework). It is noted that there is no CE identified at Bruce Bay in the August 2024 mapping which is fundamentally incorrect.</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the very general extent of the CE throughout the coastline between Makawhio Point and Arnott Point is correctly identified in the August 2024 mapping. However, it is recommended that the extent of the CE is reconsidered (and likely expanded), in the vicinity of Lake Kini (east of Bruce Bay), the Mahitahi River corridor and Bruce Bay, and Micmac Creek (west of Bruce Bay).</p>	<p>Rely on the August 2024 CE mapping in this location with the exception of reconsideration (and likely expansion) of the August 2024 CE mapping, in the vicinity of Lake Kini (east of Bruce Bay), the Mahitahi River corridor and Bruce Bay, and Micmac Creek (west of Bruce Bay).</p>
Arnott Point to Jackson Head	<p>The extent of the CE mapping along the stretch of coastline between Arnott Point and Jackson Head shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework). This includes addressing section of the coastline where no CE was identified in the notified CE (which is fundamentally incorrect). The extent of the CE in the August 2024 mapping has been reduced in the Hannahs Clearing hinterland, near the Waiatoto River</p> 	<p>Relying on my review of aerial photography and contour data, along with field work, it is my opinion that the very general extent of the CE throughout the coastline between Arnott Point and Jackson Head is correctly identified in the August 2024 mapping. However, it is recommended that the extent of the CE is reconsidered (and likely expanded), in the vicinity of the Tawharekiri Lakes, the swamplands to the north and south of the Okura River, the swamp dominated hinterland of Hannahs Clearing, and the swamp land in the vicinity of Mt Mclean.</p>	<p>Rely on the August 2024 CE mapping in this location with the exception of reconsideration (and likely expansion) of the August 2024 CE mapping, in the vicinity of the Tawharekiri Lakes, the swamplands to the north and south of the Okura River, the swamp dominated hinterland of Hannahs Clearing, and the swamp land in the vicinity of Mt Mclean.</p>

General Location	Brief description of change between the Notified and August 2024 CE mapping	BG Comments	BG Recommendations
Jackson Head to Awarua Point	<p>The extent of the CE mapping along the stretch of coastline between Jackson Head and Awarua Point shown in the Notified CE mapping (blue hatching and linework) has been expanded along the majority of its length in the August 2024 mapping (pink overlay and red linework), with some reductions in places between Jackson Head and Sandrock Bluff. It is noted that there is no CE identified between Sandrock Bluff and Awarua Point in the August 2024 mapping which is fundamentally incorrect and there is no CE mapped south of Cascade Point, and to the south of Halfway Bluff.</p> <p>There are also gaps in small gaps in the notified CE mapping, which again is technically incorrect, although I note that the August 2024 CE mapping has addressed these areas (e.g. Stafford Bay and near Seal Rocks).</p> 	Neither the notified or August 2024 CE mapping is technically correct or complete.	It is recommended that the extent of the CE between Jackson Head to Awarua Point is re-examined and mapped.



## Appendix B: Submissions in Relation to CE Mapping

Original Submission Number and Name	Location and Issue Raised	BG Comments	BG Recommendation
151 Misato Nomura	Kawatiri Place, Westport  Questions CE mapping method generally.  Considers that their property at Kawatiri Place (along with Eastons Road) does not form part of the CE as they are not able to look out to sea, they do not smell the sea and they do not have any marine life within their property. Comments that Carter Beach which is known to be a coastal settlement has been left out citing Elley Drive as an example of an inappropriate exclusion.	For the reasons set out in my discussion of the CE mapping methodology, I consider that generally, the methodology underpinning the CE mapping in the August 2024 GIS CE and Natural Character mapping is technically sound. I also consider that the CE mapping in the August 2024 GIS CE and Natural Character mapping generally correct subject to the amendments recommended in my evidence. These do not affect the CE mapping at Westport.  More specifically, I consider that Kawatiri Place technically qualifies as part of the CE. However, given that it is part of an urban area, I understand there are no specific CE policy implications for this area, which is an approach that I support for the reasons set out in my evidence.  For completeness, I note that Elley Drive is included in the CE under the August 2024 GIS CE and Natural Character mapping version, which I consider to be technically correct.	Accept submission in part.  Remove CE from the urban area of Westport, including Eastons Road.
213 Joanne and Ken Dixon	Snodgrass Road, Westport  Request CE removed from Snodgrass Road area (including their property).	I consider that Snodgrass Road technically qualifies as part of CE. However, given that it was historically urban zoned and therefore has a non-rural type character (noting that its rural downzoning relates to natural hazard issues), I consider there are no specific landscape related CE policy implications for this area, which is an approach that I support for the reasons set out in my evidence.	Accept submission in part.  Remove CE from the Snodgrass Road area.
262 Jane Neale	Ōkārito  Queries accuracy of CE mapping as it goes a long way inland in places, yet excludes the Ōkārito Lagoon.	It is noted that the notified mapping excluded the waters of the lagoon.  The August 2024 GIS CE and Natural Character mapping includes the lagoon waters and their coastal context and is considered to be technically correct.	Accept submission in part.  Amend Notified TTPP CE mapping to August 2024 CE mapping in the vicinity of Ōkārito Lagoon.
343 Tony Schroder	Chesterfield Road, north of Waimea Creek  Request that the CE boundary on their property is realigned to correspond to the terrace edge.	It is unclear which property this submission relates to and which terrace edge the submitter prefers.  It is noted that general CE mapping in the vicinity of Chesterfield Road in the August 2024 GIS CE and Natural Character mapping appears to be technically correct, and for the most part, suggests a reduced extent of CE in this part of the study area.	The submitter is encouraged to provide more detailed information with respect to their preferred alignment for the CE line in this location.
360 John Brazil	Requests that the inland extent of the CE mapping is reduced.  Specifically concerned with Utopia Road at Westport.	I consider that the majority of the Utopia Road area technically qualifies as part of CE. The exception to this is the Snodgrass Road triangle area to the western end of Utopia Road, as discussed in relation to OS #213.	Accept submission in part.  Remove CE from the from the Snodgrass Road area (including near Utopia Road).
467 Jane Whyte and Jeff Page	11 Owen Street, Punakaiki  The submission acknowledges that Punakaiki is within the CE but considers that due to level of modification the values of the area should be managed via a SVZ provisions rather than CE provisions.	While this is mainly a planning matter, I consider that the extent of the CE in the vicinity of Punakaiki as mapped in the August 2024 GIS CE and Natural Character mapping is generally correct.	Reject submission (in so far as it is relevant to landscape matters).  Retain CE in the vicinity of Punakaiki.
509 Kyle Avery	60 Orowaiti Road, Westport  Considers that the CE extends too far inland and requests that the overlay is amended to exclude their property.	For the reasons set out in my discussion of the CE mapping methodology, I consider that generally, the methodology underpinning the CE mapping in the August 2024 GIS CE and Natural Character mapping is technically sound. I also consider that the CE mapping in the August 2024 GIS CE and Natural Character mapping generally correct subject to the amendments recommended in my evidence. These do not affect the CE mapping at Westport.  More specifically, I consider that Orowaiti Road technically qualifies as part of the CE. However, given that it is part of an urban area, I understand there are no specific CE policy implications for this area, which is an approach that I support for the reasons set out in my evidence.	Accept submission in part.  Remove CE from the urban area of Westport, including Orowaiti Road.

Original Submission Number and Name	Location and Issue Raised	BG Comments	BG Recommendation
560 Royal Forest and Bird Protection Society of New Zealand	<p>Submission relates to entire TTPP area.</p> <p>Considers the CE has not been adequately mapped in the notified TTPP, noting that: no CE has been identified along parts of the coastline; urban areas have been excluded from the CE.</p> <p>Requests that: the CE is mapped by appropriate experts applying NZCPS Policy 1; until then, the CE is mapped via a default 2km landward extent.</p>	<p>My detailed review of the CE set out in Appendix A to my evidence, identifies a number of locations along the coastline where no CE has been mapped. I consider this to be technically incorrect and agree with this aspect of the submission. For these locations, I have recommended the CE as mapped in the August 2024 GIS CE and Natural Character mapping is preferred. For completeness, I consider that the latter has been prepared by an appropriate expert (Mr Stephen Brown) and aligns with NZCPS Policy 1.</p> <p>With respect to the mapping of the CE in urban areas, while I consider this to be technically correct (i.e. urban areas can and do form part of the CE), from a landscape perspective, mapping the CE in urban areas for the purposes of supporting plan policy is of limited value (as explained in my evidence).</p>	<p>Accept submission in part.</p> <p>Amend the extent of the CE mapping to adopt the CE mapping in the August 2024 GIS CE and Natural Character mapping in those parts of the districts' coastlines where there is no CE mapped in the notified TTPP CE mapping.</p>
564 Catherine Smart-Simpson	<p>Submission relates to entire TTPP area.</p> <p>Considers that the CE extends too far inland and should be reduced.</p>	<p>For the reasons set out in my discussion of the CE mapping methodology, I consider that generally, the methodology underpinning the CE mapping in the August 2024 GIS CE and Natural Character mapping is technically sound. I also consider that the CE mapping in the August 2024 GIS CE and Natural Character mapping generally correct subject to the amendments recommended in my evidence. This includes reduction to the CE mapping in places (and expansions in others).</p>	<p>Accept submission in part.</p>
567 William McLaughlin	<p>Submission relates to entire TTPP area.</p> <p>Considers that the CE extends too far inland and should be reduced especially in areas where there is settlement and agricultural use.</p>	<p>For the reasons set out in my discussion of the CE mapping methodology, I consider that generally, the methodology underpinning the CE mapping in the August 2024 GIS CE and Natural Character mapping is technically sound. I also consider that the CE mapping in the August 2024 GIS CE and Natural Character mapping generally correct subject to the amendments recommended in my evidence. This includes: reduction to the CE mapping in places (and expansions in others); and removal of the CE in urban areas.</p> <p>It is also noted that agricultural land-use, in and of itself, is not a determinative factor with respect to the identification of the CE.</p>	<p>Accept submission in part.</p>
615 Peter Langford	<p>Submission relates to entire TTPP area.</p> <p>Considers that the CE extends too far inland and should be reduced.</p>	<p>For the reasons set out in my discussion of the CE mapping methodology, I consider that generally, the methodology underpinning the CE mapping in the August 2024 GIS CE and Natural Character mapping is technically sound. I also consider that the CE mapping in the August 2024 GIS CE and Natural Character mapping generally correct subject to the amendments recommended in my evidence. This includes reduction to the CE mapping in places (and expansions in others).</p>	<p>Accept submission in part.</p>

## Appendix C: List of refinements to and re-evaluation of the August 2024 GIS HNC and ONC recommended by B Gilbert

- (a) The northern end of the coastline, where the August 2024 mapping has omitted any CE, HNC or ONC mapping in this part of the district. The Notified TTPP CE and ONC mapping is generally preferred here.
- (b) The mapping of HNC 58 on the south side of the Ōpārara River mouth where the August 2024 GIS HNC mapping should be realigned to follow the terrestrial coastal landform edges as revealed in the aerial photography.
- (c) The mapping of HNC 57 at Karamea where the August 2024 GIS HNC mapping should be adjusted in a number of places (including the area to the south of the Karamea Highway), to follow the terrestrial coastal landform edges and vegetation edges and exclude rural living properties, as revealed in the aerial photography.
- (d) The mapping of ONC 56 around the Little Wanganui River mouth, where the August 2024 GIS ONC mapping should be adjusted in a number of places to follow the terrestrial coastal landform edges and vegetation edges as revealed in the aerial photography.
- (e) The mapping of HNC 54 along the length of coastline between Mokihinui and to south of Granity, where it would appear that the August 2024 GIS HNC overlay has been inadvertently applied to the modified and inhabited coastal flats, rather than the balance of the mapped CE in this location, which comprises elevated coastal slopes in contiguous bush cover that, in my opinion, qualify as HNC.
- (f) HNC 54 at Westport, where it would appear that the August 2024 GIS HNC overlay has been inadvertently applied to the modified and inhabited coastal flats, including the urban area of Westport. This area does not in my opinion qualify as having HNC.
- (g) HNC 47 at Okari Spit, where the August 2024 GIS ONC mapping should be adjusted in a number of places to follow the terrestrial coastal landform edges (including inland coastal cliff sequences) and vegetation edges as revealed in the aerial photography.
- (h) ONC 44 near the Four Mile or Tiropahi river mouth where the August 2024 GIS ONC mapping should be aligned with the coastal edge as revealed in the aerial photography.
- (i) ONC 44 near Tiromoana where the August 2024 GIS ONC mapping should be aligned to exclude the carpark area adjacent the Fox River as revealed in the aerial photography.
- (j) Seal Island, which should be mapped as ONC (consistent with the notified TTPP ONC mapping).
- (k) The southern end of ONC 42 in the vicinity of the Porari River mouth where the August 2024 GIS ONC mapping should be aligned with the coastal landform edges as revealed in the aerial photography.
- (l) The mapping of ONC 40 where the August 2024 GIS ONC mapping would benefit from minor refinement to align with mature contiguous bush boundaries as revealed in the aerial photography.
- (m) Reconsideration of the coastline between Fourteen Mile Bluff and the northern end of Rapahoe where some of the non ONC parts of the CE are mapped as HNC in the August 2024 GIS mapping and others are not, despite what would appear to be a reasonably similar level of built modification across the two areas.
- (n) Reconsideration of the northern extent of HNC 38 in the August 2024 GIS mapping to exclude part of the Rapahoe residential settlement and follow the coastal landform and vegetation edges as revealed in the aerial photography.
- (o) Reconsideration of the extent of ONC 37 south of Point Elizabeth in the August 2024 GIS mapping to: remove the areas where rural living development is evident; and elsewhere, minor refinement to align the ONC boundary with mature contiguous bush boundaries as revealed in the aerial photography.
- (p) Reconsideration of the extent of HNC 35 in the vicinity of Gladstone and Kaimata/New River in the August 2024 GIS mapping to: remove the areas where a concentration of built development is evident; and elsewhere, minor refinement to align the HNC boundary with coastal landform boundaries as revealed in the aerial photography.
- (q) Minor refinement of HNC 33 in the August 2024 GIS mapping to exclude areas of legible and sizeable ground disturbance/bush clearance as revealed in the aerial photography.
- (r) The mapping of HNC 32 near the Arahura River mouth where the August 2024 GIS ONC mapping would benefit from minor refinement to align with mature contiguous bush and coastal landform boundaries as revealed in the aerial photography.
- (s) Refinement of HNC 31 near Tui Island in the August 2024 GIS mapping to remove sizeable areas of harvested production forestry and align the HNC edges with vegetation boundaries as revealed in the aerial photography.
- (t) Refinement of ONC 28 in the vicinity of the Wanganui River and the Poerua River in the August 2024 GIS mapping to align with contiguous mature coastal vegetation features and/or coastal landforms as revealed in the aerial photography.
- (u) Minor refinement of ONC 27 in the August 2024 GIS mapping to follow vegetation and landform boundaries in the vicinity of the Whataroa River interface as revealed in the aerial photography.
- (v) Refinement of ONC 26 in the vicinity of the more inland stretch of the Waitangitona River in the August 2024 GIS mapping to exclude the pastoral farming dominated river flats throughout the eastern margins of the ONC area, as revealed in the aerial photography.
- (w) Consequential amendments to the mapping of ONC 23 in the August 2024 GIS mapping in the vicinity of the Waiho River and Docherty Creek as a result of refinement of the CE mapping (recommended earlier).
- (x) Reconsideration of the extent of HNC 24, ONC 23 and ONC 22 in the vicinity of Gillespies Beach in the August 2024 GIS mapping to acknowledge the areas where there is a concentration of built development and pastoral land uses as revealed in the aerial photography.
- (y) Consequential amendments to the mapping of ONC 22 in the August 2024 GIS mapping in the vicinity of the Hunts Beach as a result of refinement of the CE mapping.
- (z) Re-examination of the extent of HNC 21 in the August 2024 GIS mapping near Hunts Beach Road, where it would appear appropriate to extend the overlay based on aerial photography and landcover datasets.
- (aa) Consequential amendments to the mapping of ONC 20 and ONC 19 in the August 2024 GIS mapping in the vicinity of the Bruce Bay as a result of refinement of the CE mapping. (NB the existing settlement at Bruce Bay should be excluded from the overlay.)

- (bb) Refinement of the mapping of HNC 18 and ONC 19 in the August 2024 GIS mapping in the vicinity of the Paringa River mouth, so that the huts along the eastern side of river are included in the HNC overlay extent, rather than the ONC overlay.
- (cc) Re-examination of the extent of HNC 11 in the August 2024 GIS mapping in the vicinity of Haast Beach, particularly in relation to the area of morass, the removal of small-scale residential lots from the overlay and the alignment of the boundary to follow coastal landform and vegetation features (and thus exclude pastoral land), as revealed in aerial photography.
- (dd) Refinement of the ONC 7 linework around Hannah's Clearing to exclude residential properties and achieve a 'non-overlay margin' along the southern side of the settlement area that is of a similar scale to that mapped along the eastern side.
- (ee) Consequential amendments to the HNC and/or ONC mapping in the August 2024 GIS mapping in the vicinity of Tawharekiri Lakes, the swamplands to the north and south of the Okura River, the swamp dominated hinterland of Hannahs Clearing, and the swamp land in the vicinity of Mt Mclean as a result of refinement of the CE mapping.
- (ff) Re-examination of the natural character mapping between Jackson Head and Awarua Point where reconsideration of the CE mapping is recommended due to errors in both the Notified TTPP CE mapping and the August 2024 CE mapping. It is expected that the majority, if not all of the CE in this part of the study area will qualify as ONC (as indicated in the Notified TPP mapping).
- (gg) An overall sense check of any amended August 2024 ONC mapping against the ONL mapping for the districts is also recommended, as the extent of ONC areas will generally be the same or less than the mapped ONL areas (i.e. typically ONC areas are not larger than ONL areas).

## Appendix D: Submissions in Relation to HNC Mapping

Original Submission Number and Name	Location and Issue	HNC Reference	BG Comments	BG Recommendation
447 Vance and Carol Boyd	Hannahs Clearing Considers that the HNC 10 mapping in the vicinity of Hannahs Clearing should be realigned to exclude their property ie Lots 1, 2, and 3 DP 357973.	HNC 10	I have reviewed the August 2024 HNC and ONC mapping. The overlay that applies in the vicinity of the submitter's land is ONC. Therefore, this submission point is addressed in Appendix D.	See Appendix D.
101 Katherine Crick	Pakiroa Beach and coastal flats near Barrytown. Consider that the coastal flats and beach should be identified as HNC.	N/A	Neither the notified TTP HNC and ONC mapping or the August 2024 HNC/ONC mapping identify the area in question as being HNC. Relying on my review of aerial photography and contour data, along with field work, it is my opinion that this area does not qualify as HNC due to the level of built development and farming modification evident.	Reject submission.
150 Ruth Henschel	4456B Karamea Highway Remove the HNC overlay from this property.	HNC 57	A HNC overlay applies to the majority of the property under the Notified TTPP HNC and ONC mapping and the August 2024 HNC/ONC mapping, with relatively minor differences in the mapped extent between the two.  I generally support this area being identified as HNC (subject to my comments below) due to the very limited level of modification and dominance of natural vegetation, patterns and processes.  However, as explained in the main body of my evidence, I consider that the mapping of HNC 57 at Karamea in the August 2024 HNC mapping should be adjusted in a number of places (including the area to the south of the Karamea Highway) to follow the terrestrial coastal landform edges and vegetation edges and exclude rural living properties as revealed in the aerial photography.	Accept submission.
216 Glenn Robinson	6A Stafford Loop Road, Arahura Remove the HNC overlay from this property.	HNC 33	A HNC overlay applies in the vicinity of parts of Stafford Loop Road under the Notified TTPP HNC, however this has been removed in its entirety in the vicinity of Stafford Loop Road in the August 2024 HNC mapping.  Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping in the vicinity of Stafford Loop Road. This is due to the level of built development and farming modification evident.	Accept submission.
228 Jackie Mathers and Bart Gillman	170 Torea Street, Granity Amend the mapping of HNC 54 in the vicinity of their property.	HNC 54	As explained in the main body of my evidence, I consider that the mapping of HNC 56 needs to be corrected along the length of coastline between Mokihinui and to south of Granity where it would appear that the August 2024 HNC overlay has been inadvertently applied to the modified and inhabited coastal flats, rather than the balance of the mapped CE in this location, which comprises elevated coastal slopes in contiguous bush cover that would qualify as HNC. I note that if this mapping change was made, it would reduce the extent of the HNC overlay on the submitters' land.  For completeness, relying on my review of aerial photography and contour data, along with field work, I consider that such a mapping change would be technically correct due to the patterning of contiguous bush cover in the area.	Accept submission in part.
318 Hadland Family.	Chesterfield (near Kumara Junction) Remove the HNC overlay for the terrace area south of Chesterfield Road to north of the Waimea Creek, including 1298 Kumara Junction Highway.	HNC 33	Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping for the terrace area south of Chesterfield Road to north of the Waimea Creek. I note that the HNC overlay areas has been slightly reduced in extent when compared to the Notified TTPP HNC mapping, to exclude modified areas where built development (in particular) is evident and I support this change. For completeness, I consider that the August 2024 HNC 33 area merits identification due to the patterning of contiguous bush cover in the area.	Accept submission in part.
320 Lynne Lever and Greg Tinney	Chesterfield (near Kumara Junction) Remove the HNC overlay for the terrace area south of Chesterfield Road to north of the Waimea Creek, including 1298C Kumara Junction Highway.	HNC 33	Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping for the terrace area south of Chesterfield Road to north of the Waimea Creek. I note that the HNC overlay areas has been slightly reduced in extent when compared to the Notified TTPP HNC mapping, to exclude modified areas where built development (in particular) is evident and I support this change. For completeness, I consider that the August 2024 HNC 33 area merits identification due to the patterning of contiguous bush cover in the area.	Accept submission in part.

Original Submission Number and Name	Location and Issue	HNC Reference	BG Comments	BG Recommendation
343 Tony Schroder	Chesterfield (near Kumara Junction) Remove the HNC overlay for the terrace area south of Chesterfield Road to north of the Waimea Creek.	HNC 33	It is unclear which property this submission relates to.  Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping for the terrace area south of Chesterfield Road to north of the Waimea Creek. I note that the HNC overlay area has been slightly reduced in extent when compared to the Notified TTPP HNC mapping, to exclude modified areas where built development (in particular) is evident and I support this change. For completeness, I consider that the August 2024 HNC 33 area merits identification due to the patterning of contiguous bush cover in the area.	Accept submission in part.
377 Trevor Hayes and others.	Pakiroa Beach and coastal flats near Barrytown. Consider that the coastal flats and beach should be identified as HNC.	N/A	Neither the notified TTP HNC and ONC mapping or the August 2024 HNC/ONC mapping identify the area in question as being HNC. Relying on my review of aerial photography and contour data, along with field work, it is my opinion that this area does not qualify as HNC due to the level of built development and farming modification evident.	Reject submission.
488 West Coast Regional Council	Remove HNC on stopbanks at Karamea, Kongahu ( Granite Creek) and Mokihinui.	HNC 57 (Karamea Domain and Kongahu) HNC 56 (Mokihinui)	It is unclear where the submitter is seeking changes to the HNC mapping in this regard. Exclusion of stopbanks from HNC mapping may well be appropriate, however this will be scale, character and context dependent.  Generally, the August 2024 HNC mapping in the vicinity of the locations mentioned in the submission would appear to be accurate, excepting in relation to earlier comments with respect to HNC 57 reproduced below for ease of reference:  (c) <i>The mapping of HNC 57 at Karamea where the August 2024 GIS HNC mapping should be adjusted in a number of places (including the area to the south of the Karamea Highway), to follow the terrestrial coastal landform edges and vegetation edges and exclude rural living properties, as revealed in the aerial photography.</i>	The submitter is encouraged to provide further detail with respect to the mapping changes that they are seeking.
536 Straterra	Remove the Birchfield Coal Mines Limited Rapahoe Coal Yard from the HNC and ONC overlays.	HNC 38	As explained in the main body of my evidence, it is recommended that HNC 38 is refined to exclude built development at the Rapahoe residential settlement and re-aligned to follow the coastal landform and vegetation edges as revealed in the aerial photography.  However, modifications to the HNC 38 mapping in response to the Mineral Extraction zoned areas that are in undeveloped bush cover is not supported due to the level of existing natural character evident.	Accept submission in part.
561 Fiona McDonald	Pahautane Review the HNC overlay at Pahautane.	HNC 43	Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping for the Pahautane area. I note that there has been a change to the HNC (and ONC) overlay areas in the vicinity of Pahautane between the Notified TTPP HNC/ONC mapping and the August 2024 HNC/ONC mapping. For completeness, I support the August 2024 HNC mapping. However, I note that the extent of the August 2024 ONC mapping would appear to extend beyond the January 2024 ONL mapping. I consider this to be an example of where the two mapping layers need to be reviewed in tandem.  I note that the August 2024 HNC mapping includes the odd dwelling and some smaller scaled undeveloped lots, however the continuity of coastal landform and vegetation patterns across these areas means that they display HNC. It is also noted that the definition of HNC applied in the underlying natural character assessment acknowledges that such areas are likely to contain human modification.	Accept submission in part.
572 Jon Barltrop	Pahautane Review the HNC overlay to exclude the stand of pine trees on the submitter's land at 5186 State Highway 6 Fox River.	HNC 43	Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping for the Pahautane area. I note that there has been a change to the HNC (and ONC) overlay areas in the vicinity of Pahautane between the Notified TTPP HNC/ONC mapping and the August 2024 HNC/ONC mapping. For completeness, I support the August 2024 HNC mapping. However, I note that the extent of the August 2024 ONC mapping would appear to extend beyond the January 2024 ONL mapping. I consider this to be an example of where the two mapping layers need to be reviewed in tandem.  I note that the August 2024 HNC mapping includes the odd dwelling and some smaller scaled undeveloped lots, however the continuity of coastal landform and vegetation patterns across these areas means that they display HNC. It is also noted that the definition of HNC applied in the underlying natural character assessment acknowledges that such areas are likely to contain human modification.	Accept submission in part.

Original Submission Number and Name	Location and Issue	HNC Reference	BG Comments	BG Recommendation
575 Amanda Jenkins	Pahautane Review the HNC overlay at 5263 State Highway 6, Fox River.	HNC 43	<p>Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 HNC mapping for the Pahautane area. I note that there has been a change to the HNC (and ONC) overlay areas in the vicinity of Pahautane between the Notified TTPP HNC/ONC mapping and the August 2024 HNC/ONC mapping. This includes a reduction in the extent of the HNC 43 mapping in the vicinity of the submitter's land to exclude areas that are more dominated by built development.</p> <p>For completeness, I support the August 2024 HNC mapping. However, I note that the extent of the August 2024 ONC mapping would appear to extend beyond the January 2024 ONL mapping. I consider this to be an example of where the two mapping layers need to be reviewed in tandem.</p> <p>I note that the August 2024 HNC mapping includes the odd dwelling and some smaller scaled undeveloped lots, however the continuity of coastal landform and vegetation patterns across these areas means that they display HNC. It is also noted that the definition of HNC applied in the underlying natural character assessment acknowledges that such areas are likely to contain human modification.</p>	Accept submission in part.
415 GE and CJ Coates on behalf of Nikau Deer Farm	Not known.	Not known.	It is unclear which property this submission relates to.	The submitter is encouraged to provide more detailed information with respect to their preferred alignment for the HNC overlay.
492 Dr Michael Snowden	Okuru River Remove the HNC from the privately owned farmland and residential lots southwest of Okuru-Turnbull.	HNC 11	<p>The August 2024 HNC mapping shows a reduced extent when compared to the notified TTPP HNC mapping in this location, with farmland largely excluded. This is supported.</p> <p>However, the main body of my evidence recommends further refinement of the August 2024 HNC 11 mapping to exclude all small-scale residential properties in the area and align the boundary to coastal landforms to exclude farmland.</p>	Accept submission.
663 Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd	Urban Areas Amend the planning maps as necessary such that identified areas of High Natural Character do not cover existing urban development	General submission	As explained in the main body of my evidence, I support the removal of the HNC overlays from urban areas.	Accept submission.

## Appendix E: Submissions in Relation to ONC Mapping

Original Submission Number and Name	Location and Issue	ONC Reference	BG Comments	BG Recommendation
305 Raylene Black	Hannahs Clearing Considers that the ONC 7 mapping in the vicinity of the southern end of Hannahs Clearing should be realigned to exclude their property (1976b Haast Jackson Bay Road).	ONC 7	I have reviewed the August 2024 ONC mapping and consider that it needs to be corrected to remove residential scaled lots at the southern end of Hannahs Clearing. As explained in the main body of my evidence, I consider that refinement of the ONC 7 linework around Hannah's Clearing to exclude residential properties and achieve a 'non-overlay margin' along the southern side of the settlement area that is of a similar scale to that mapped along the eastern side	Accept submission.
381 Laurence Rueter	The Pyramid, Karamea Include the Pyramid at Karamea in the ONC overlay.	ONC 59	Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 ONC mapping in the vicinity of The Pyramid at Karamea. This excludes the Pyramid which I consider to be technically correct due to the level of earthworks and built modification in this location.	Reject submission.
447 Vance and Carol Boyd	Hannahs Clearing Considers that the ONC 7 mapping in the vicinity of the southern end of Hannahs Clearing should be realigned to exclude their property ie Lots 1, 2, and 3 DP 357973.	ONC 7	I have reviewed the August 2024 ONC mapping and consider that it needs to be corrected to remove the submitters' land. As explained in the main body of my evidence, I consider that refinement of the ONC 7 linework around Hannah's Clearing to exclude residential properties and achieve a 'non-overlay margin' along the southern side of the settlement area that is of a similar scale to that mapped along the eastern side	Accept submission.
482 Tim Macfarlane	North Beach Road, Cobden Remove the ONC on the approved subdivision and confine the mapped area to Rapahoe Range Scenic Reserve	ONC 37	The main body of my evidence recommends the reconsideration of the extent of ONC 37 south of Point Elizabeth in the August 2024 ONC mapping to: remove the areas where rural living development is evident; and elsewhere, minor refinement to align the ONC boundary with mature contiguous bush boundaries as revealed in the aerial photography.	Accept submission in part.
536 Straterra	Remove the Birchfield Coal Mines Limited Rapahoe Coal Yard from the HNC and ONC overlays.	ONC 39	Modifications to the ONC 39 mapping in response to the Mineral Extraction zoned areas that are in undeveloped mature bush cover are not supported due to the level of existing natural character evident.	Reject submission.
570 Dean Van Mielo	Punakaiki Amend the maps to remove the ONC overlay from Lot 43 DP 3558 Blk IX Brighton SD	ONC 42	Relying on my review of aerial photography and contour data, along with field work, I agree with the notified TTPP ONC mapping and the August 2024 ONC mapping in the vicinity of submitter's land.  This includes the submitter's land which I consider to be technically correct due to the very modest scale of built modification evident set within an extensive mature coastal bush context.	Reject submission.
535 Neil Mouat	Punakaiki Remove ONC overlay from 4224 State Highway 6, Punakaiki.	ONC 42	Relying on my review of aerial photography and contour data, along with field work, I agree with the notified TTPP ONC mapping and the August 2024 ONC mapping in the vicinity of submitter's land.  I note that the extent of the ONC mapping has been reduced in the vicinity of the submitter's land between the Notified TTPP ONC mapping and the August 2024 ONC mapping.	Reject submission.
563 Geoff Volckman	Oparara, near Karamea Lot 1 DP 483059, Section 1 SO 15488 and Section 50 Blk IX Oparara SD Listed parcels to remain excluded. This submission relates to The Pyramid, near Karamea.	ONC 59	Relying on my review of aerial photography and contour data, along with field work, I agree with the August 2024 ONC mapping in the vicinity of The Pyramid at Karamea. This excludes the Pyramid which I consider to be technically correct due to the level of earthworks and built modification in this location.	Accept submission.