

**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 10: Natural Features and Landscapes

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

**LANDSCAPE**

**13 December 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** I prepared a Landscape Report in January 2024, which reviewed the Outstanding Natural Landscapes (**ONLs**) identified in the West Coast districts by Stephen Brown of Brown NZ Ltd and provided expert landscape comment in response to specific ONL related submissions on the Proposed Te Tai o Poutini Plan (**TTPP**) Topic 10: Natural Features and Landscapes.

**1.6** My January 2024 Landscape Report included the following summary:

*Relying on the reasoning set out in the main body of this report, the updated ONL mapping (January 2024) and notified ONL Schedules are considered to be broadly in accordance with landscape assessment best practice and are, generally, technically sound.*

*The following amendments to the notified ONL Mapping and Schedules are recommended:*

- a) Reference to the SASMs that coincide with ONLs are included in the relevant ONL Schedule.*
- b) Any more detailed evidence with respect to tāngata whenua values for ONL areas provided by submitters during the hearing process is incorporated in the relevant ONL Schedule text.*
- c) Clear guidance is included in the TTPP (perhaps by way of a Preamble to TTPP Part 4: Schedule Five: Outstanding Natural Landscapes), that explains:
  - i. the reasonably high-level nature of the ONL Schedules;*
  - ii. that the landscape values identified relate to the ONL as a whole, rather than specific sites; and*
  - iii. that other landscape values may be identified as part of an application-specific landscape assessment, including landscape modifications that are an accepted part of the landscape (e.g. infrastructure, buildings) and more negative landscape attributes (e.g. pests).**
- d) The updated ONL mapping (January 2024) is carefully reviewed by a landscape/GIS expert to ensure:
  - i. the following areas are excluded from the mapped ONLs:
    - *Sizeable pastoral areas.*
    - *Sizeable plantation forestry areas, particularly on the edges of ONLs.***

- Areas where the arrangement, scale, and/or prominence of built development exerts a dominant influence on landscape character.
- ii. ONL linework is 'clipped' to obvious landform and or contiguous native vegetation cover edges in the immediate vicinity of the mapped ONL.
  - iii. the mapping of the southern end of ONL 5 is amended to extend to the district boundary.

e) *In response to location specific ONL submissions:*

- i. *Minor refinement of the ONL 14 mapping in the vicinity Donovan Drive, Franz Joseph is recommended to follow a 'landscape' rather than a zone boundary. (S449 Totally Tourism Limited.)*
- ii. *Minor refinement of the ONL 31 mapping to exclude the patterning of dwellings throughout the lower slopes across the western side of the Rapahoe Range and include the elevated and contiguous bush area that sits above the dwellings. (S506 Claire and John West and others.)*
- iii. *Minor refinement of the ONL 29 mapping to exclude grazing land. (S515 Russell Robinson.)*
- iv. *Minor refinement of the ONL 26 mapping to exclude grazing land and plantation forestry areas around the edges of the ONL. (S599 WMS Group (HQ) Limited and WMS Land Co. Limited.)*
- v. *Refinement of the updated ONL mapping (January 2024) so that areas of pine plantation on the following properties are excluded from the ONL mapping:*
  - *Site between Waitaha River and Poerua River that coincides with ONL 17*
  - *Lot 1 Deposited Plan 3135 (near The Forks) ONL15*
  - *Site between Lake Hochstetter and Lake Haupiri ONL32*

*(S620.158 Te Rūnanga o Ngāi Tahu, Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio.)*

**1.7** The purpose of my reply evidence is to provide the Hearing Panel with an update on progress in relation to the various recommendations set out in my January 20204 Landscape Report.

**1.8** Further, since my attendance at the Topic 10 hearing, I have also reviewed the ONL mapping in the vicinity of the Denniston Plateau, which is raised in the Bathurst Resources Limited and BT Mining Limited submission (S491). My reply evidence also discusses this matter.

## **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. INCLUSION OF SASM INFORMATION IN ONL SCHEDULES**

**3.1** I understand that Ms Easton has recommended a series of amendments to the Schedule Five: ONL Schedules which reference the specific SASM that coincide with the relevant ONL area. I consider that this adequately addresses my recommendation in this regard.

## **4. INCLUSION OF INFORMATION PRODUCED DURING THE TOPIC X HEARING RE TĀNGATA WHENUA VALUES IN ONL SCHEDULES**

**4.1** I am unaware of any specific references to tāngata whenua values that submitters have requested be included in the ONL Schedules. For this

reason, no specific changes have been made to the ONL Schedule text in this regard (although this is discussed again shortly under 'Preamble').

## **5. SCHEDULE FIVE: ONLs - PREAMBLE**

**5.1** I have provided Ms Easton with suggested wording for a Preamble to Schedule Five which I consider will appropriately guide the technical use of the schedules.

**5.2** For completeness, given the absence of any additional information relating to tāngata whenua values emerging during the Topic 10 hearing, I consider that the Preamble allows for such information to be identified as part of a finer grained proposal specific assessment.

## **6. ONL MAPPING**

**6.1** I confirm that I have reviewed the ONL mapping with the GIS expert to exclude:

- (a) sizeable pastoral areas;
- (b) sizeable plantation forestry areas, particularly on the edges of the ONLs; and
- (c) areas where the arrangement scale, and/or prominence of built development exerts a dominant influence on landscape character.

**6.2** This review exercise has also included clipping the ONL linework to obvious landform and or contiguous native vegetation cover edges in the immediate vicinity of the mapped ONL and amending the southern end of ONL 5 to extend to the district boundary.

**6.3** These various ONL mapping amendments are incorporated into the version of the TTPP ONL mapping titled: BG Landscape Areas October 2024 (subcategory: ONL).

## **7. ONL SUBMISSIONS**

**7.1** I confirm that the ONL October 2024 ONL mapping has been amended to address the following specific ONL mapping related submissions:

- (a) Minor refinement of the ONL 14 mapping in the vicinity Donovan Drive, Franz Joseph is recommended to follow a 'landscape' rather than a zone boundary. (S449 Totally Tourism Limited.)
- (b) Minor refinement of the ONL 31 mapping to exclude the patterning of dwellings throughout the lower slopes across the western side of the Rapahoe Range and include the elevated and contiguous bush area that sits above the dwellings. (S506 Claire and John West and others.)
- (c) Minor refinement of the ONL 29 mapping to exclude grazing land. (S515 Russell Robinson.)
- (d) Minor refinement of the ONL 26 mapping to exclude grazing land and plantation forestry areas around the edges of the ONL. (S599 WMS Group (HQ) Limited and WMS Land Co. Limited.)
- (e) Refinement of ONLs 15, 17 and 32 so that substantial areas of pine plantation are excluded from the ONL mapping:  
(S620.158 Te Rūnanga o Ngāi Tahu, Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio.)

## **8. BATHURST RESOURCES LIMITED AND BT MINING SUBMISSION (S491)**

**8.1** The legal submissions on behalf of the submitter request that the ONL mapping in the vicinity of the Denniston Plateau aligns with the findings in *West Coast Environmental Network Inc v Royal Forest and Bird Society of New Zealand Incorporated [2013] NZEnvC 047*, and more specifically,



that the Denniston Plateau area identified in Appendix 2 (labelled Figure 1) to Bathurst's legal submissions is excluded from the ONL.

**8.2** I confirm that the Denniston Plateau area in Appendix 2 (to the submitters' legal submissions) is excluded from the BG Landscape Areas October 2024 version of the ONL mapping.

**Bridget Gilbert**

**Date: 13 December 2024**