

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

**LANDSCAPE**

**3 February 2025**

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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. My qualifications and experience are as set out in my evidence in chief dated 2 September 2024.

**1.3** 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 evidence in chief and to respond to a number of questions that were raised by the Panel during my attendance at the hearing on 22 October 2024.

## **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. MAPPING OF THE COASTAL ENVIRONMENT**

**3.1** My evidence in chief (**EiC**) included a review of the Coastal Environment (**CE**) mapping (EiC Appendix A) and recommended seven locations where I considered that refinement of the CE linework was required:

- (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.*

- 3.2** I confirm that these various CE mapping amendments are incorporated into the version of the TTPP CE mapping titled: BG Landscape Areas October 2024 (subcategory: CE).

**4. APPENDIX A: CE MAPPING REVIEW**

- 4.1** During the hearing, the Panel identified an error in my EiC Appendix A mapping where I had inadvertently included the incorrect section of mapping to accompany my analysis of the CE mapping between Kaipakati Point and Dolomite Point. I have attached an updated version of my EiC Appendix A to my reply evidence which includes the correct mapping for this area (refer **Appendix A**).

- 4.2** For completeness, I confirm that my analysis of the appropriateness of the August 2024 CE mapping in this location remains unchanged.

**5. HNC and ONC MAPPING**

- 5.1** My evidence in chief (**EiC**) included a review of the HNC and ONC mapping and recommended the refinement or re-examination of the August 2024 HNC and ONC mapping (refer EiC Appendix C).

- 5.2** I confirm that the TTPP HNC and ONC mapping titled: BG Landscape Areas October 2024 (subcategories: HNC and ONC) has been updated to incorporate those mapping changes.

## 6. HNC SUBMISSIONS

**6.1** Appendix D to my EiC provided a response to submissions seeking changes to the HNC mapping. I confirm that the mapping changes that I recommended in relation to submissions 150, 228, 492, 561, 572 and 575 have been incorporated into the BG Landscape Areas October 2024 mapping.

*S318 (Hadland Family), 320 (Lynne Lever and Greg Tinney), 343 (Tony Schroder): Chesterfield Terraces*

**6.2** I have reviewed more detailed contour information since preparing my EiC and am of the opinion that the CE line in the vicinity of the Chesterfield terrace to the south of Chesterfield Road needs to be amended, so that it is positioned closer to the coast. This CE mapping change means that the southern portion of HNC 33 is no longer mapped in the BG Landscape Areas October 2024 mapping.

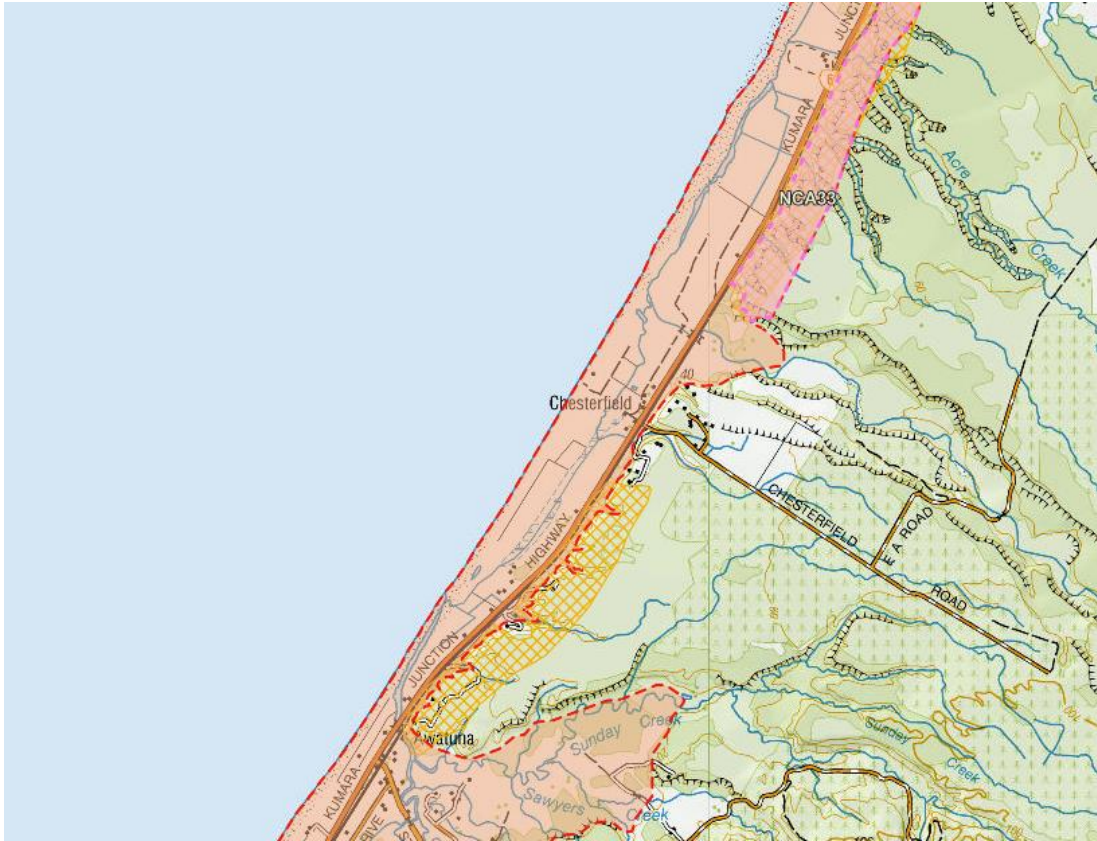


Figure 1: Red dashed line and overlay: BG Landscape Areas October 2024 Coastal Environment mapping; Pink dashed line and overlay: BG Landscape Areas October 2024 HNC mapping; Orange hatched area : notified TPP HNC mapping.

*S488 (West Coast Regional Council)*

**6.3** The West Coast Regional Council requested that the HNC overlay is removed from the stopbanks at Karamea, Kongahu (Granite Creek) and Mokihinui Rivers. Since I prepared my EIC, the submitter has provided more detailed information with respect to the nature and location of such structures.

**6.4** I consider that the scale, character, and/or extent of permanent flood protection structures is such that the areas where these are present does not qualify as HNC. For these reasons, the BG Landscape Areas October 2024 version of the HNC mapping in the vicinity of the Karamea, Kongahu (Granite Creek), and Mokihinui Rivers has been amended to exclude the areas where permanent flood protection structures are evident.

## **7. ONC SUBMISSIONS**

**7.1** Appendix E to my EiC provided a response to submissions seeking changes to the ONC mapping. I confirm that the mapping changes that I recommended in relation to submissions 305, 447, and 482 have been incorporated into the BG Landscape Areas October 2024 mapping.

*S536 (Straterra)*

**7.2** Appendix D to my EiC provided a response to submissions seeking changes to the HNC mapping. I confirm that the mapping changes that I recommended in relation to submissions 150, 228, 492, 561, 572, and 575 have been incorporated into the BG Landscape Areas October 2024 mapping.

**7.3** I agree that the ONC mapping in this location merits amendments due to the level of modification identified in the submitter's more detailed information. On this basis, I have amended the mapping of ONC 39 to exclude all of the modified areas in the vicinity of the coal yard.

*S570 Dean van Mielo*

**7.4** I have reviewed the more detailed information provided by the submitter and amended the mapping of ONC 42 to exclude the disturbed areas of the property (Lot 43 DP 3558 Blk IX Brighton SD) at Punakaiki.

## **8. HNC and ONC SCHEDULES**

**8.1** I have reviewed the HNC and ONC Schedules against the BG Landscape Areas October 2024 version of the HNC and ONC mapping. This has resulted in a series of recommended amendments to the schedule text to:

- (a) Make better sense of schedule title in light of mapping amendments.



- (b) Very minor text amendments to better reflect the landscape elements, patterns, or processes associated with the relevant area.
- (c) Correct errors in the notified schedules where ONC schedules were misallocated to the HNC Schedule and vice versa.
- (d) Delete schedules where a HNC or ONC area is no longer mapped.

**8.2** I have attached an updated version of the HNC and ONC Schedules in **Appendices B and C** to my reply evidence (NB red text corresponds to the changes that I am recommending.)

## **9. RECOMMENDATIONS**

**9.1** In light of some of the shortcomings with the CE and HNC/ONC work identified in my EIC, the Panel has asked to me to prepare a list of tasks that could be undertaken in the future to improve the robustness of the CE and HNC/ONC mapping and schedules.

**9.2** In my opinion, the following 'tasks' would be of benefit:

- (a) Review of the CE linework by iwi.
- (b) Review of the HNC and ONC mapping and schedule text by natural science experts (for example, geomorphology and ecology inputs).

**9.3** In light of these comments, I would also recommend the inclusion of a Preamble at the beginning of the HNC and ONC Schedules that:

- (a) explains the high-level nature of the Schedules;

- (b) acknowledges that the HNC and ONC Schedules have not been informed by natural science expert input;
- (c) explains that the values recorded in the Schedules relate to the general area and may not apply to a specific site within the mapped natural character area;
- (d) advises that a finer grained proposal specific assessment of natural character will typically be required for plan development and plan implementation purposes; and
- (e) explains that a finer grained assessment may identify other natural character attributes and values that are not recorded in the schedules.

**Bridget Gilbert**

**Date: 3 February 2025**