

**BEFORE AN INDEPENDENT HEARINGS PANEL
OF THE WAIKATO DISTRICT COUNCIL**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the proposed
Waikato District Plan
(Stage 1) Hearing 25

**SUPPLEMENTARY EVIDENCE OF RACHEL VIRGINIA DE LAMBERT ON BEHALF
OF HYNDS PIPE SYSTEMS LIMITED AND THE HYNDS FOUNDATION**

VISUAL AND LANDSCAPE

11 June 2021

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1. INTRODUCTION

1.1 My full name is Rachel Virginia de Lambert. I am a Landscape Architect and Partner of Boffa Miskell Limited (**Boffa Miskell**).

1.2 I have outlined my qualifications, experience and commitment to comply with the Environment Court Expert Witness Code of Conduct in my evidence in chief.

1.3 I have previously provided evidence on behalf of Hynds Pipe Systems Limited and the Hynds Foundation (together, **Hynds**) and Pokeno Village Holdings Limited (**PVHL**) in relation to their submissions/further submissions on the Proposed Waikato District Plan (**Proposed Plan**).

1.4 This supplementary evidence is filed on behalf of Hynds in response to the supplementary evidence of Mr Robert Pryor on behalf of Havelock Village Limited (**HVL**).

2. RESPONSE TO MR PRYOR'S SUPPLEMENTARY EVIDENCE

2.1 In the lead-up to this Hearing I have also had the opportunity to access the HVL site on 9 June 2021 with Mr Tollemache, HVL's consultant planner. I had not previously had the opportunity to do this and the photographs that I had appended to my rebuttal evidence were taken from viewpoints adjacent to the boundary of the HVL site.

2.2 When I visited the HVL site on 9 June 2021 I had not yet received Mr Pryor's supplementary evidence. However, Mr Tollemache did show me a map showing the viewpoints for Mr Pryor's photographs when he took me across the HVL site.

2.3 My visit to the HVL site confirmed my opinion as to the reasonable extent of proximate visual catchment within the HVL land to the Heavy Industrial zoned land. Therefore I remain of the opinion that areas 1 and 2 as set out in Figure 1 of the attachment to my rebuttal evidence (with some slight refinement at the margins) continue to be an appropriate buffer between the residential and Heavy Industrial land uses. I note that both of the buffer areas I proposed in my rebuttal evidence are within 400m of the Heavy Industrial or Industrial zone boundary.

2.4 I accept at face value the photographs provided in Mr Pryor's supplementary evidence. However, in my opinion, they demonstrate the difficulty in capturing three dimensional landscape in a still image photograph. Specifically, I note that:

- (a) The land continues to rise above Mr Pryor's viewpoints and in doing so views to the industrial lands – above 1 or 3m screen planting comes into view. I also consider relying of planting to be problematic in this case because this land is all about view and the view is over, onto and across an extensive area of industrial activities;
- (b) Some of Mr Pryor's photographs are also not oriented toward including of the views towards the Hynds site, such as photo 10 for example. In this respect it would be highly beneficial for the Panel to visit the site; and
- (c) The photographs are also ground level views whereas beyond the initial single storey set back two storey houses will be enabled.

2.5 As such, I do not agree that the noise contour set back is fully sufficient to address reverse sensitivity matters in respect of visual effects.

2.6 Mr Pryor's supplementary evidence includes images of existing situations of residential to industrial interface in Pokeno. As noted in my evidence these are already a part of Pokeno's urban mix. However the HVL land is different to these existing situations due to the very elevated nature of the HVL land above the Heavy Industrial zoned area and the largely north orientation over the heavy industrial area to the longer distance views beyond. There is a level of direct and elevated overlooking that does not occur elsewhere in Pokeno.

2.7 In summary, I remain of the opinion that the buffer proposed by HVL should be extended to include areas 1 and 2 as shown on the plan in Figure 1 'Areas to be included within Buffer to Industrial Land' that was attached to my rebuttal evidence.

Rachel Virginia de Lambert

11 June 2021