

BEFORE THE WAIKATO DISTRICT COUNCIL

UNDER the Resource Management Act 1991

IN THE MATTER Landscape Chapter

EVIDENCE OF REBECCA KEREN RYDER

LANDSCAPE ARCHITECT

ON BEHALF OF THE WAIKATO DISTRICT COUNCIL

11 SEPTEMBER 2020

CONTENTS

Qualifications and Experience.....	3
Code of Conduct	4
Scope of Evidence	4
PART A – RECOMMENDED ATTRIBUTES TABLE	5
Ta Ta Valley Limited – Waikato River Margins.....	5
PART B SITE SPECIFIC SUBMISSIONS OUTSTANDING NATURAL FEATURES AND LANDSCAPES, AND SIGNIFICANT AMENITY LANDSCAPES.....	7
Waikato Regional Council – Mt Karioi Identification	7
Bernard Brown and Liz Hughes – Mt Karioi Identification.....	8
Bernard Brown - Te Akau Coast	10
Kiwirail Holdings – Whangamarino Wetland.....	10
PART C METHOD OF ASSESSMENT.	11
Waikato- Tainui – Te Awa o Waikato	11
Geoscience Society of NZ Geopreservation Sites = Outstanding Natural Features	14

Qualifications and Experience

1. My name is Rebecca Keren Ryder. I am a Landscape Architect and Associate Partner, of the firm Boffa Miskell Limited (BML), a multi-disciplinary company with expertise in planning, design, ecology, landscape planning, cultural heritage, graphics and mapping.
2. I have been with BML since 2001. I am experienced in all areas of landscape architecture and assessment. I have given expert witness evidence before numerous councils and the Environment Court.
3. I hold a Bachelor of Landscape Architecture (Honours) from Lincoln University and am affiliated to the New Zealand Institute of Landscape Architects as a Registered Landscape Architect. I am an executive member of the Executive Committee for the New Zealand Institute of Landscape Architects.
4. Of relevance to this hearing I am experienced in the areas of identification of Natural Character, Outstanding Natural Features and Landscapes (ONFLs) and effects assessment on natural character, landscape character, ONFLs, and visual amenity. My background pertinent to this matter includes my role as a co-author in the Waikato District Landscape Study (June 2018) and as co-author of the Waikato Regional Council's technical report; Natural Character Study of the Waikato Coastal Environment. I am familiar with this District and its coastal environment having undertaken the field assessment required for this study.
5. By way of background I have also prepared technical landscape and natural character studies for numerous regional and district authorities including; Tauranga City, Western Bay of Plenty District, Whakatane, Opotiki, Bay of Plenty Region, Waikato District, Hastings District and currently Taupo District. I have also provided advice on landscape matters for Rotorua District and the aforementioned authorities.
6. I have also participated in the DOC¹ facilitated NZCPS Policy 13 Guidance Note workshop and have been party to the joint preparation of the initial and subsequent versions of the Boffa Miskell Ltd *Relationship between Landscape and Natural Character Diagram* included in the Waikato Region and District Natural Character Studies.

¹ Department of Conservation

Role

7. I have been engaged by Waikato District Council to undertake a review of the submissions and associated technical evidence prepared by submitters. I have contributed as a technical expert in sections of the Section 42a report and have provided technical recommendations. My role has comprised the preparation of the technical landscape study and the review of submissions. I have not contributed to the preparation of the policy framework and associated objectives, policies and rules for the notified Proposed Waikato District Plan.
8. Following review of the submissions I have provided recommendations to the alignment of identified natural feature and landscapes and natural character areas, be that Outstanding, Significant or High classifications. At the time of preparing this evidence I have not undertaken site specific ground truthing (site visits) to confirm my recommendations. It is my intention to, where able, to undertake these site visits prior to the commencement of the associated hearing.

Code of Conduct

9. I confirm that I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

Scope of evidence

10. Within this statement of evidence, I will address submitter matters raised in evidence under the following sections:
 - (a) Recommended Attributes Tables
 - (b) Site Specific Submissions relating to:
 - (i) Outstanding Natural Features and Landscapes
 - (ii) Significant Amenity Landscapes

- (c) Submissions relating to Method of Assessment for:
 - (i) Waikato River and its margins;
 - (ii) Geopreservation Sites;

PART A RECOMMENDED ATTRIBUTES TABLE

11. An attributes schedule has been provided in earlier technical guidance, as part of the Council Officers Section 42A report, to assist Council and the community in understanding the factors, values and associations attributed to the identified Outstanding Natural Features (ONF), Outstanding Natural Landscapes (ONL), Significant Amenity Landscapes (SAL) and Natural Character Areas (NCA).
12. Undertaken as part of a district wide study the attributes provided draw from the factors, values and associations identified in the Waikato District Landscape Study. These attributes reflect the evaluation undertaken by the Boffa Miskell Ltd team and the Iwi Reference Group. They respond to all three dimensions of landscape as set out in 12B of the Waikato Regional Policy Statement² and the tangata whenua values identified by the Iwi Reference Group.
13. There is undoubtedly some detail that may not be captured in full within the tables, of which submitters deem important for managing these features, landscapes and natural character areas. In my view there is opportunity, where raised, for the inclusion of additional information within the attributes table where it relates to the underlying evaluation approach and attributes identified. In response to submissions from the Geoscience Society of NZ, there is significant merit by including further detail of geoscience values under the biophysical attributes dimension for the identified areas. This would be a collaborative exercise between Council and the submitters to ensure the detail captured is relevant to the attributes and intent of the table.

Ta Ta Valley Limited – Waikato River Margins

14. In the primary evidence of Mr Adam Jellie (20 August 2020) he supports the inclusion of a schedule for the identified SALs however he considers the schedule does not clearly set out what the attributes are and has recommended a minor amendment. He

²<https://www.waikatoregion.govt.nz/Council/Policy-and-plans/Regional-Policy-Statement/RPS2016/Part-B/12/B/>

considers that the schedule does not provide enough specificity on the attributes to enable a clear and robust assessment against the relevant objectives and policies.

15. The preparation of the Significant Amenity Landscape tables has been drawn directly from the Waikato District Landscape Study summaries for each of the SALs. Within the study further detail is provided and can be included into a revised schedule with further elaborates, much like the ONFL attributes table, that reflects the identified factors, values and associations evaluated for the SAL.
16. Terms attributes to the table, in my view, can be amended to reflect the following structural adjustments:

Significant Amenity Landscape / Outstanding Natural Feature or Landscape	
Description:	
Te Ao Maaori (Iwi Hapuu narrative)	
Identified Attributes	
Biophysical	
Sensory	
Associative	
Threats	
■	

17. In response to the request for more specificity, this is certainly possible however this will not be at a property specific degree, as it considers the identified area as a whole. This is a result of site visits to individual private properties, not being undertaken. In my view the description and summary of attributes should be read together, alongside consideration of the underlying landscape study. In my experience it is best practice when considering effects assessment that site specific values are identified and then evaluated against the broader landscape studies. Given the scales of the District versus a site-specific assessment consideration of how a sites values contribute to the overall identified ONF, ONL or SAL are considered. Further detail could be provided in the tables, but this does not, in my opinion, discount the need for site specific assessment to evaluate the site's values against the broader identified values.

PART B SITE SPECIFIC SUBMISSIONS OUTSTANDING NATURAL FEATURES AND LANDSCAPES, AND SIGNIFICANT AMENITY LANDSCAPES.

18. I have prepared the technical response to the Section 42A report and in some cases provided recommended adjustments to the extent of the identified Outstanding Natural and Landscapes. Further evidence that challenges the identification of specific areas, not covered in Part C of this evidence, has been received from:
- i. Waikato Regional Council – Mount Karioi mapping extent
 - ii. Mr Bernard Brown – Mount Karioi ONF, ONL and SAL
 - iii. Ms Liz Hughes – Mount Karioi SAL
 - iv. Mr Bernard Brown -Te Akau Coast
 - v. KiwiRail Holdings Limited – Submission Point [81.183 and 81.184]
 - vi. Ta Ta Valley Limited
19. The following provides a response to those matters raised in evidence of the above, as it relates to the identification of the areas.

Waikato Regional Council – Mount Karioi Identification

20. Waikato Regional Council (WRC) raise concern regarding lack of the extension of extent of the ONL of Mt Karioi to the coastal edge³. WRC suggests that the panel seek further technical clarification from Boffa Miskell to ensure that the proposed District Plan gives effect to the WRPS⁴.
21. The WRPS identifies Mount Karioi as ONFL4 with the following description:
- “Distinctive volcanic cone shape, location close to the coast, good quality indigenous vegetation. Cliffs and headlands along the coastal edge. Tramping tracks and botanical values.”*
22. The Waikato Landscape Study reviewed both regional and district landscape assessments undertaken which both identify Mount Karioi as an Outstanding Natural Feature or Landscape. The district study considered the mountain at a district scale, and has identified two landscape overlays on the landscape, being an Outstanding Natural Landscape and a Significant Amenity Landscape. Collectively these identify the volcanic landscape as a unified landscape area.

³ Refer to WRC Submission and Letter in Support points 81.183 and 81.184.

⁴ WRPS = Waikato Regional Policy Statement

23. The WRPS ONFL4 is identified by an underlying technical study, Waikato Regional Landscape Assessment, prepared by Mary Buckland, February 2010. The assessment report however does not include spatial mapping indicating the extent of the ONFL4. However the WRPS does provide a spatial extent at the WRPS [Map 12-4](#), which encompasses the District study's SAL and ONL.
24. When comparing Regional and District wide landscape studies, there are often differences between the spatial extent of the identified feature or landscape. This is often associated with the scale at which the dimensions of the landscape or feature is assessed at. Notably the Operative Waikato District Plan Landscape Policy Area for Mt Karioi does not match the regional ONFL4 extent and is markedly smaller than this.
25. With regard to the extent of the mapped proposed landscape areas (ONL and SAL) the district landscape study evaluated the full extent of the coastal edge. As part of the mapping exercise the GIS shape files prepared were clipped to the jurisdictional boundaries provided under the Statistics New Zealand Territorial Authority 2020 GIS layer. In my further investigations on this 'mapping extent' our GIS team have corresponded and confirmed with the Council GIS team that this is the appropriate layer to use.
26. I acknowledge for fullness of the study that the full landward extent of the coastal edge is considered and in my view the cliffs and coastal margin have been considered in the evaluation. Whilst the mapping of the ONL and SAL do not follow the extent of the WRPS ONFL4, the area has been evaluated and considered with the factors, values and associations considered, applying the WRPS identified attributes and further attributes considered for Maori.
27. It is my view that there is room for extension of those areas identified along the coastal margin to extend to the coastal edge. Whilst the landscape study has considered the landscape as a whole the resultant mapping has applied the jurisdictional boundary for the inclusion into the district planning maps. With regard to the latter, we are able to modify GIS shape files to match the coastal extent and take guidance from Waikato District Council on the common jurisdictional boundary.

Mr Bernard Brown & Ms Liz Hughes – Mount Karioi Identification

28. Mr Bernard Brown has raised key matters pertaining to the extent of the ONL overlay and the SAL areas of Mt Karioi. Mr Brown considers that the landscape study separates the upper slopes of Mt Karioi as "natural values" and the lower slopes as "amenity

values". He considers this fails to consider the contextual values of the mountain. He also raises this was the basis for the Tainui O Tainui Appeal Settlement in 2012 and accordingly the Landscape Policy Area boundary was rolled back to accommodate tangata whenua settlement of their land.

29. In response, the evaluation of Mt Karioi, as explained above in response to WRC's submission, was undertaken considering the maunga as a landscape and in consideration of the WRPS where the entire feature, including Mr Brown's property is identified as an ONF. I disagree with Mr Brown that Karioi has not been considered as a whole. The Waikato District Landscape Study, specifically identifies the varying values within Karioi itself, evaluating the entire landscape under the attributes identified in the study. The attributes tables supplied in the Section 42A report provide further detail, extracted from the study, for Karioi. In my opinion the maunga has been identified as a whole whilst identifying the variance in values associated with the landscape as a whole. I disagree with Mr Brown in regard to the landscape factors, values and associations identified for the SAL and in order to give effect to the WRPS and the overall evaluation I consider the SAL should remain on the lower slopes of Mt Karioi, including Mr Brown's property.
30. Ms Hughes disagrees with encumbrances designated to the overlay and I leave these to Ms Jane Macartney to respond to specifically. I note Ms Hughes recognises the landscape amenity values within the area and her site of which I agree. Currently I am unclear whether Ms Hughes disagrees with the values identified for the SAL or whether she is more concerned with the associated objectives, policies and rules which apply to the SAL. Therefore, I am unable to respond any further to her submission.
31. Turning to the ONF / ONL layers, Mt Karioi was identified⁵ as a ONL, not an ONF, and accordingly my technical advice recommended the mapping be updated to accurately reflect this. In response to Mr Browns submission (Item 2.3.(b)) to "*replace the proposed ONL classification for Mt Karioi with an Outstanding Natural Feature (ONF) classification excluding the Tainui o Tainui "Development areas"*"; I note that the proposed ONL withdraws in extent from the Operative Landscape Policy Area overlay, however does not remove in its entirety the aforementioned development areas. I note at the time of writing this evidence, Council are investigating the associated consent order and decision that provides direction for any removal of the Landscape overlays. With regard to my area of expertise the identified area remains in response to the

⁵ Refer Pages 58 to 63 of the Waikato District Landscape Study, Boffa Miskell Ltd, June 2018

factors, values and associations that exist. I will await the outcomes of further investigations prior to the hearing to guide any recommended mapping changes.

32. In my opinion, I consider this part of Mr Brown's submission has been met in part, however I do not support his recommended classification from ONL to ONF.

Mr Bernard Brown – Te Akau Coast

33. Turning to address Mr Brown's submission requesting considering of the Te Akau Coast for inclusion as SAL it is my view that this area has been evaluated as part of the District wide study and the values have been recognised at a district level and areas along the coast identified as SALs, an ONF (Horea – Rangitoto Point) and High Natural Character areas⁶. Whilst the entire area has not been identified, as Mr Brown requests, as a SAL those qualities that reflect the natural processes and unique character of the Te Akau coastline have been characterised and identified. Mr Brown's request, in my view has in part already been provided for, and the request inadvertently seeks to reclassify Horea-Rangitoto Point from ONF to a SAL. This in my view does not reflect the higher ratings attributed to the factors, values and associations of this feature.
34. In summary it is my opinion the landscape areas, whether they be ONL, ONF and SAL have been in response to a district wide study and reflect the values identified in earlier studies and the WRPS. I respectfully do not support the proposed changes by Mr Brown, however I acknowledge the localised importance he attributes to this area of the District.

KiwiRail Holdings Limited – Whangamarino Wetland

35. Further evidence received from Ms Pam Butler on behalf KiwiRail seeks that the areas of the ONF- Whangamarino Wetland accurately reflect the *values and attributes of the relevant land, taking into account the location of the existing regionally significant infrastructure, such as the NIMT*⁷.
36. With regard to my area of expertise, the identification of areas of landscape value are not based on 'future' use of an area, but the existing condition. Landscape attributes including biophysical factors, sensory and associative values rely on the existing

⁶ Refer Pages 53, 84-89, 144 - 148 of the Waikato District Landscape Study, Boffa Miskell Ltd, June 2018

⁷ Refer to Paragraph 3.6 of Evidence of Ms Pam Butler

condition of an environment. I note that this site is also recognised as a RAMSAR site and its values also recognised as an existing ONF and proposed ONF.

37. In that regard I support the removal of the ONF mapping extent where modifications associated with the rail corridor exist at this time. I do not support the full removal of the ONF within a designation as it is important that these values are considered at the time of any further modification to ensure future activity avoids adverse effects on the factors, values and associations of the ONF.

PART C METHOD OF ASSESSMENT

Waikato- Tainui – Te Awa o Waikato

38. Waikato-Tainui cultural heritage expert, Antoine Coffin, has provided cultural heritage expert evidence which addresses the Maaori cultural dimensions of the landscape assessment. He outlines a number of points, some of which sit outside my area of expertise with regard to cultural heritage approaches, however I respond in response to landscape evaluation and matters pertaining to the delivery of the Waikato District Landscape Study. The resultant outcomes of Mr Coffin's evidence are two recommendations to Te Awa o Waikato under a Cultural Landscape category and scheduling under the Maaori Area of Significance.
39. In response to the process undertaken for engagement to identify values attributed to landscapes as part of the Waikato Landscape Study. This work was undertaken via Waikato District Council's iwi reference group. Multiple hui were undertaken with the participants to identify criteria and values attributed to landscapes. Those participants contributed to the writing of the values attributed to these landscapes, which included considerable input from Waikato Tainui's representative within the group.
40. Understanding cultural and community appreciation for landscapes can range from desktop to extensive engagement. The iwi reference group was, at the time, seen as a means to connecting and providing hapu with a role and opportunity to input into the evaluation of these landscapes and features. With regard to the identification the landscape study undertaken went further in its investigations and understanding of landscapes and giving effect to the WRPS.
41. Discussions surrounding the Te Awa o Waikato were also part of the engagement and input through the iwi reference group. The role Boffa Miskell Ltd had with Waikato

District Council's Iwi Reference Group was to facilitate and capture their values attributed to landscape. It is my understanding that the final landscape study was provided to the group for final review prior being put forward for inclusion into the Waikato District Plan. Boffa Miskell Ltd were not part of this final step, however we acknowledge the considerable input the Iwi Reference Group provided to the study, and in my opinion goes further than numerous landscape studies throughout NZ. In my view I support a continued improvement in the engagement and input of iwi and hapu in the identification of landscape as a means of continued improvement to the evaluation of Outstanding Natural Features and Landscapes nationally.

42. Mr Coffin identifies a framework of ten values that are based on his earlier (2015) research at a regional level. He discusses the application of the Maaori Culture and Traditions Assessment Criteria and considers these to be very broad and include criteria that could have a diverse range of interpretations and applications⁸. Whilst helpful if we were to apply this approach to just Te Awa o Waikato we would naturally need to apply the same approach across the remainder of the District's landscapes.
43. At Paragraphs 86 and 87 he discusses that the landscape methodology disadvantages Maaori, who do not see the landscape in regional or district terms. I acknowledge his view here and recognise that human relationship with landscapes or features vary from community to community and person to person. The District study focused to the physical extent of the District and its landscapes. Te Awa O Waikato moves within one region and four districts. The awa is a formative feature within the Waikato landscape with different relationships with Maaori and varies in its natural condition along varying lengths of the river. Its underlying importance is apparent however the approach undertaken considers relevant scales to this District and areas within the District that reflect all dimensions (Biophysical, Sensory and Associative) of the landscape.
44. In my opinion the Waikato Landscape Study, has integrated but not wholly adopted a Maaori world view, to landscape evaluation. The process of identifying the criteria was a collaborative one with the iwi reference group and my colleague, Mr Te Pio Kawe, and I remain comfortable, that whilst improvements could be made, the criteria applied, and evaluation has fairly considered all dimensions of landscape under the current framework. I remain of my opinion that Te Awa O Waikato is an important feature in the landscape both physically and culturally and that there are areas of the river that have varying degrees of biophysical, sensory and associative values. In order to

⁸ Refer paragraph 80 of Antoine Coffin Evidence.

appropriately address the river as a whole Outstanding Natural Feature or Landscape, it is my opinion that this should be undertaken as an assessment of the entirety of the river, to ensure consistency of approach is applied. This would take into account the varying physical condition and a holistic river perspective.

Cultural Landscape

45. Mr Coffin agrees in the differentiation between the approach undertaken and that of Cultural Landscapes, discussed in the Waikato Landscape Study⁹. He considers the approach to landscape assessment as reductionist and does not comfortably provide or recognise Maaori world views. I concur and it is my hope there will be ongoing change to the practice of assessment of landscape that reflects Maaori world view. The landscape study undertaken was specifically not applying a cultural landscape study method or developing a method. This approach is emerging and will continue to evolve to reflect the Maaori and Western world views of landscape.
46. Undertaking cultural landscape assessment, in my view, is differentiated from the existing landscape assessment. I support undertaking a cultural landscape assessment that is a Maaori Landscape Assessment to focus reflecting the Maaori world view. The approach can adopt an innovative approach that in my view requires the input of landscape architecture and cultural heritage practitioners. I consider this approach to differ to that of the Waikato District Landscape Study which focuses to landscape characterisation and identification of important natural landscapes, applying the WRPS section 12.
47. Mr Gavin Donald recommends the adoption of Mr Coffin's suggested new approach to the identification of a cultural landscape. Whilst I will not rebut Mr Donald's evidence at length, I do note that from an assessment method perspective his recommended plan provisions¹⁰ of applying an arbitrary 32m setback to define the spatial extent of the river would naturally undermine any assessment method developed. Any spatial extent of identified landscape areas, whether they be natural features, natural landscapes or cultural landscapes, should be informed by the attributes.
48. I note that Mr Coffin does not recommend a scaling or measuring of Outstanding Cultural Landscape but does recommend the application of a cultural landscape assessment framework. In order to determine an 'outstanding' threshold is applied,

⁹ Refer page 11 of Waikato Landscape Study, Boffa Miskell, June 2018

¹⁰ Refer paragraph 10.3 of Evidence of Mr Gavin Donald

from my experience in landscape assessment, the area or feature needs to stand out from other areas within a district, region or area. Therefore, to apply a classification of Outstanding Cultural Landscape a wider cultural landscape study or the like, would be required to baseline and evaluate what is outstanding and what isn't. I am not suggesting that Te Awa O Waikato may not be an outstanding cultural landscape, but that in order to determine this, a method and approach should be applied across a broader area than just the river itself.

49. *(intentionally blank)*

Geoscience Society of NZ – Geopreservation Sites = Outstanding Natural Features

50. Mr Bruce Hayward provides a detailed brief of evidence which raises a number of matters to which I will respond. The key areas of the evidence I respond to comprise;
- a) Approach undertaken in response to WRPS
 - b) Differentiation between landscape and feature.
 - c) Differences in method approach to identification of ONFs
 - d) Request for inclusion of Geopreservation sites

Approach undertaken in response to WRPS

51. Mr Hayward highlights the differing approaches adopted by other unitary and district authorities whereby the ONF evaluation has been undertaken by applying directly in Whangarei, and more indirectly in the Auckland Unitary Plan, the Geoscience Society Best Practice Guide: Outstanding Natural Features. It is important to recognise that the WRPS and numerous other Regional Policy Statements do not identify separate criteria between ONF and ONLs. As such the work undertaken as part of the Waikato District Landscape study applied the WRPS 12B Landscape Assessment Approach including Table 12-2.

Differentiation between landscape and feature.

52. I accept there are differences in the views of experts, from differing professions, in the method of identifying Outstanding Natural Features. It is apparent from the evidence that the starting assumptions of what a landscape and what are feature are, are grounded in the fundamentals of each profession. As detailed in my earlier Technical Report a landscape and feature, using the approach undertaken are both scale related and reliant on the consideration of all three dimensions of landscape, being biophysical, sensory and associative. Mr Hayward has formed a view based of the WRPS 12.1 and

12B that landscapes and features are different, which I agree with. However, he goes on to consider that the landscape assessment methods should not apply to features¹¹. I disagree with this approach, and as is evident from submissions from Waikato Tainui, the cultural associations with landscapes and features can be of significance for Outstanding Natural Features.

Differences in method approach to identification of ONFs

53. The geosciences approach applies a western science approach and the Waikato District Landscape Study applies a multi-dimensional approach with a cultural evaluation. As can be seen from the earlier section of my evidence there are pressures to consider features and landscapes within our district from a variety of dimensions. In that regard I consider the approach taken within the Waikato District Landscape study to responds appropriately to the WRPS, applying an appropriate scale including the involvement of tangata whenua in the evaluation.
54. It is not been the underlying assumption to include or exclude geopreservation sites as ONFs in District Landscape studies. As a landscape architect working in this area, and as can be seen in the Waikato District Landscape Study, the geopreservation sites are considered as part of the overall evaluation, particularly in regard to the biophysical dimension of the assessment. I concur with Mr Hayward that with features, the biophysical dimension's attributes, in particular the geology may be brought to the fore in the identification. However, in some cases other dimensions (sensory and associative) may also come to the fore. I remain of the opinion that all three dimensions of landscape apply to features, as well as landscapes. And that these dimensions can individually and collectively influence the identification, or lack of identification, of a feature in a district wide study.
55. The approach of adopting the Geopreservation sites as ONF's across the Waikato District has number of variances in scale of 'features' when applying the differences between a feature and a landscape. In our evaluation of the Waikato District and the earlier Franklin District Schedule 5b features a number of these features resided in modified, settled and agriculturally worked areas. As an example, the Pukekawa Scoria Cone, identified in Schedule 5b of the Franklin section of the Waikato District Plan, includes settlement and agricultural land use atop. Whilst geologically significant it

¹¹ Refer paragraph 6.6 – 6.7 of Mr Hayward Evidence

retains lower values attributed to the sensory and associative dimensions of the landscape.

Request for Inclusion of Geopreservation Sites

56. However, as stated in the technical report some geopreservation sites, that are included in either the ONF, ONL, SAL and Natural Character areas. These are outlined in my Technical Report and provided in further detail in the maps appended to Ms Jane Macartney's responding evidence.
57. It is important to identify that, as a result of the method applied, the inclusion of all geopreservation sites recommended by the Geosciences Society of NZ has not occurred. However, some are included as ONFs and as part of ONLs (Karioi). Some also reside, in part, within the intertidal zones outside of the 'District' along the coastline. As per my earlier recommendation there is significant merit in GSNZ providing input into the identification of geological features within the district.
58. I recognise the GSNZ's frustration with differing approaches and the lack of inclusion all sites identified by them as ONFs. As stated earlier the approach undertaken, whilst challenged by GSNZ, applies the WRPS criteria to both features and landscapes. It identifies features and landscapes and avoids identifying features within features. The application of scale helps to differentiate features from landscapes and reflects the context in which people experience their surrounding environment.
59. In order to provide an approach which affords the recognition of the identified outstanding geopreservation sites by GSNZ, the approach should recognise the weighting toward the biophysical dimension in both the attributes table and policy framework. As recommended by GSNZ the inclusion of Geoheritage ONFs, in my view, is a suitable approach, that would reflect the separate identification process of these features. In doing so, it would clearly differentiate the scaling of ONFs and the differences between those and the Waikato District Landscape Study identified ONF and ONLs. This will enable a nuanced policy response that would protect the sensitivities of these features from inappropriate activities, e.g. earthworks. In my view where we have considered but not identified all geopreservation sites in the Waikato District Landscape Study there is merit in the inclusion of these features recognising the differences in approach.

60. There is a clear question raised here of which profession has a mandate to identify ONFs. In my view both professions are able to identify ONFs in accordance with their approaches so long as the criteria and values are clearly identified. I recognise a multi-disciplinary approach in the study would have been beneficial to enable both approaches to collaborate to identify ONL and ONF areas. I remain in support of the inclusion of geoheritage features are included into the District Plan, where they are not already included and scheduled in the Waikato District Landscape Study and proffered Attributes Tables. The additional criteria proposed for inclusion into the PWDP, as set out in 13.6 of Mr Haywards evidence, should be, in my opinion be specific to geoheritage sites and recognise the Geoheritage ONF's identified. I remain of the view that the criteria for ONFs require consideration of all three dimensions and this should not be lost in the development of separate ONF criteria. As such I consider the inclusion of a new Geoheritage ONF recognise specifically the geological weighting in both the criteria, classification and rule framework.



Rebecca Ryder



11 September 2020