

**BEFORE A HEARINGS COMMISSIONER APPOINTED BY THE OTAGO REGIONAL
COUNCIL**

IN THE MATTER OF the Resource Management Act 1991 (“the Act” or “the RMA”)

AND

IN THE MATTER OF Green Island Landfill Closure

STATEMENT OF EVIDENCE OF RACHAEL ANNAN

ON BEHALF OF OTAGO REGIONAL COUNCIL

24 FEBRUARY 2025

QUALIFICATIONS AND EXPERIENCE

- 1 My full name is Rachael Annan. I am a registered member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA) and hold a Bachelor of Landscape Architecture Degree (Hons.) from Lincoln University.
- 2 My professional experience involves over 20 years across the areas of landscape architecture, landscape planning and urban design review. In my current role I am employed by SLR Consulting New Zealand Limited as a Technical Director. I lead SLR's New Zealand based landscape planning work.
- 3 I have worked on rural and urban based projects for applicants and councils across New Zealand. I have provided expert evidence at both council hearings and the environment court. My project work has included both consent and plan change applications and providing technical advice informing district plan preparation.

SCOPE OF EVIDENCE

- 4 My evidence addresses the potential landscape effects of the landfill closure proposal.
- 5 In full, relevant matters include the landscape character (landscape values), visual amenity and natural character effects. Matters of note include potential visual amenity effects for surrounding residents overlooking the site, and natural character outcomes in relation to Kaikorai Stream, Abbots Creek and Kaikorai Estuary.

CODE OF CONDUCT FOR EXPERT WITNESSES

- 6 I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses (Environment Court Practice Note 2014) and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the matters addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

BACKGROUND CONTEXT

- 7 To provide landscape peer review of this application of the draft then finalised application landscape assessment, I have prepared:

- (a) An initial RFI, issued by email: 5 April 2023 (of the pre-application assessment, BML 15 March 2023)
 - (b) Preliminary Landscape Review Memo, 30 November 2023 (of the Draft Application Landscape Assessment, BML 12 October 2023)
 - (c) Final Landscape Peer Review Memo, 21 October 2024 (of the 'Landscape, Natural Character and Visual Effects Report', Appendix 13 to the lodged application AEE)
- 8 I have visited the application site and surrounding landscape setting, (both with regards to this application and the adjacent RRPP application), most recently on 4 February 2025.

RELEVANT SUBMISSIONS

- 9 Of relevance to landscape matters, the Te Rūnanga o Ōtākou submission (13 December 2023) covers matters including the Vegetation Management and Restoration Plan (VMRP); quoting relevant conditions, numbers 41 and 42.

ISSUES OF AGREEMENT AND DISAGREEMENT

- 10 There are no issues of disagreement of consequence regarding landscape findings.
- 11 However, the application's proposed planting strategy via the VMRP is anticipated after a decision on the application. The VMRP will need to clearly demonstrate a mitigation approach responsive to the nature and magnitude of the application, and place specific landscape values.
- 12 The application landscape assessment acknowledges that (emphasis added):

'Kaikorai Estuary is a key feature adjacent to the Site, modified but recognised as holding important values, including to mana whenua as well as important bird habitat.' (p. i)

'However, although modified, natural character of the adjacent Kaikorai Stream, Abbotts Creek and Estuary is higher [than that of the site], particularly in regard to the birdlife it supports and scenic qualities present.' (p. 25)

- 13 Relevant identified landscape values associated with the estuary therefore involves sensory (experiential, i.e. scenic) values, associative values (particularly for mana whenua) and bird-life habitat, despite the level of landscape modification.
- 14 Opportunity is provided for ORC review of the VMPP. However, conditions do not specify if any related planting work will commence prior to the document's completion.
- 15 The key matter sought is balance, in that the benefits of replacing established exotic planting with native planting do not unnecessarily compromise vegetative screening. The scenic value afforded and/or habitat provision (this being a matter of ecological expertise) of established exotic planting should also be addressed.
- 16 Further mitigation design analysis may be required to address issues identified through the (VMPP) review.

CONDITIONS OF CONSENT

- 17 Quoted below is the Vegetation Management and Restoration Plan section – paragraphs 41-42 (with emphasis added) of the proposed conditions (as of 20 February, 2025).

Vegetation Management and Restoration Plan

- 18 41 A Vegetation Management and Restoration Plan (VMPP) must be prepared by a suitably qualified person within six months of the granting of this consent. This Plan shall be prepared in accordance with the Draft Vegetation Restoration Management Plan Framework (Boffa Miskell, 2023). The purpose of the Plan is to manage the health and long-term replacement of the existing screening vegetation on the site, and provision of riparian planting, with the objective of ensuring the landfill and waste minimisation and transfer facilities continue to be integrated into the surrounding landscape, adverse visual effects are minimised, existing views of Pukemakamaka/Saddle Hill are maintained, and the enhancement of ecological and cultural values. The Plan must be developed in consultation with Te Rūnanga o Ōtākou. As a minimum the Plan must include:
 - a. A survey of the health of the existing trees within the site and other DCC owned areas for revegetation, by an appropriately qualified arborist or similar expert, with knowledge of local environmental conditions.
 - b. Routine monitoring and maintenance of the existing trees to promote their health and long-term stability.

- c. Long-term post closure actions for the replacement of the existing trees, incorporating eco-sourced native species to enhance natural character, landscape, and amenity values, and their ongoing maintenance. This will be carried out in a staged process demonstrated to best provide for the continuation of vegetation screening of an effective scale and height, particularly with regards to the outlooks of surrounding residents.
 - d. Riparian planting and pest management to support restoration of the ecological values of the Kaikorai Estuary, provision of habitat for taoka species and rebalancing of mauri, and in consideration of identified values, both of wildlife supported and scenic values.
 - e. A detailed programme of works, including timeframes for implementation. A minimum 3 year plant maintenance period for new planting shall apply.
 - f. Key responsibilities of onsite personnel.
 - g. A review process that includes Te Rūnanga o Ōtākou and Otago Regional Council.
- 42 The Vegetation Management and Restoration Plan must be submitted to Otago Regional Council to assess that it has been prepared by appropriately qualified personnel in accordance with the conditions of consent and certification in accordance with general condition 4.
- 43 The Vegetation Restoration Management Plan certified under general condition 4 must be implemented in accordance with the timeframes specified in the Plan and the vegetation maintained on an ongoing basis by the Consent Holder.

FURTHER MATTERS

- 19 At the time of writing, it is understood that the proposal requires a 4% finished slope, and that this will occur without increased overall height. While it is anticipated that the increase instead to the breadth of the landfill may not cause additional adverse landscape effects in and of itself, this has not yet been confirmed by the application landscape assessment (or evidence).

Rachael Annan

24 February 2025