

STELLA PASSAGE DEVELOPMENT
LANDSCAPE EFFECTS
JOINT WITNESS CONFERENCING JOINT WITNESS STATEMENT

Introduction

1. This joint witness statement (**JWS**) relates to expert conferencing on the topic of Landscape Effects.
2. The expert conferencing was held on 17 July 2026.
Venue: Online
Independent Facilitator: Sharon Dines
Admin Support: Portia Sutherland

Code of Conduct

3. This joint statement is prepared in accordance with section 9.4 of the Environment Court Practice Note 2023.
4. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

Purpose and scope of conferencing

5. The questions posed are attached as Schedule 1. **Schedule 1** sets out the relevant background to the conference and the specific questions to be answered.

Witness Conference Participants

6. Witness conferencing participants and their expertise are listed in **Schedule 2**:

Experts' positions

7. **Schedule 3** sets out the experts' positions on the items of the agenda.

Date: 20 July 2026



Stephen Brown, Brown NZ Limited



Dr Alanya Rā, WSP



Brad Coombs, Isthmus

Schedule 1

The extent of agreement or disagreement between the experts on:

1. The receiving environment;
2. The relevant landscape scale for assessment;
3. Viewshafts from Whareroa Marae to the Kaimai ranges, both from Mr Brown's Viewpoint 1 and from within the marae complex itself;
4. The landscape, visual, and natural character effects of the Project in relation to Whareroa Marae;
5. Cumulative landscape and natural character effects in relation to Whareroa Marae; and
6. Adequacy of proposed draft conditions to address above;
7. Any further amendments to proposed draft conditions to address above.

Schedule 2

EXPERTS NAME, ORGANISATION AND EXPERTISE	PARTY	NOTES
<u>Stephen Brown</u> <i>Brown NZ Ltd</i> Landscape architect	Port of Tauranga Limited (POTL)	Statement of Evidence of Stephen Kenneth Brown (7 May 2026) at paragraph [1] – [6].
<u>Dr Alayna Pakinui Rā</u> <i>WSP</i> Landscape architect	Ngāti Kuku for Ngāti Kuku Hapū Trust and Whareroa Marae	Statement of Evidence of Dr Alayna Pakinui Rā (30 April 2026) at paragraph [1] – [7].
<u>Brad Coombs</u> <i>Isthmus</i> Landscape architect	Bay of Plenty Regional Council	See statement of qualifications and experience in Attachment 1.

Schedule 3

Agenda item	General discussion	Agreed position	Disagreements or reservations, with reasons
1. The receiving environment;	Whilst the CVA and CIS were not reviewed as part of the initial assessment, on further review of these documents post assessment, Mr Brown confirmed that these did not change his assessment of effects, nor did they redefine his understanding of the receiving environment.	Mr Brown identified the receiving environment as being all of those areas potentially affected by the Port expansion, together with those that have a sense of connection with it. This area extends from Tauranga to Mount Maunganui and Otumoetai, together with related parts of Te Awanui. Mr Brown did not consider the Kaimai Ranges or other remote landforms and catchments to be part of the receiving environment.	As part of the conferencing, Dr Rā was able to confirm that critical material, where mana whenua have documented their understanding of the receiving environment, have not been considered by Mr Brown as part of this assessment. This includes the Tauranga Moana Iwi Collective Deed, the Tauranga Moana Iwi Collective Redress Bill, the Kaimai Ranges as a Statutory Acknowledgement Area and the recognition of the significance of the Kaimai Ranges as documented in environment court evidence and hearings. Mr Brown reiterated that even though a proposal such as the Port expansion may have an impact on perception of and the values associated with features like the Kaimai Ranges – when

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			viewed from Mt Maunganui and Tauranga – those effects are on his identified receiving environment around that development area, not on the Kaimai Ranges themselves. Dr Rā considers that this methodology misses the interaction of the three domains of Te Tangi a Te Manu and the intersecting mana whenua interests of whakapapa, korero toku iho, and hikoi. As discussed in conferencing, relationships between mana whenua and surrounding ancestral landscapes do not occur in one direction only. Personified and ancestral landscapes are a receiving environment in their own right, and also experience obstruction of connection back towards the marae and whānau that they share in kōrerorero (conversation

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			back and forth) and karangaranga (calling back and forth) with. Dr Rā therefore considers this Application, and the associated permitted activities, disrupts this connection in both directions, and therefore both the marae and the Kaimai Ranges are receiving environments. Mr Coombs is in general agreement with Mr Brown's description of the receiving environment.
2. The relevant landscape scale for assessment;		The experts agree that this is interrelated with the extent of the receiving environment. The experts' positions are therefore as outlined in (1).	
3. Viewshafts from Whareroa Marae to the Kaimai ranges, both from Mr Brown's Viewpoint 1 and	Even without the development of the Stage 1 and Stage 2 expansion proposals, existing activities within the container terminal	Dr, Rā, the mana whenua appointed pūkenga, was afforded the opportunity to discuss directly with hapu their previously noted	Given this situation outlined in column 2, it is Mr Brown's view that the proposed Port expansion would have a low level of effect on

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from within the marae complex itself;	could already screen out most, if not all, of the Kaimai Range in views from the Marae.	connections and values to the Kaimai Ranges. In her pūkenga capacity, Dr Rā, maintained her independence, per the Code of Conduct requirements. Dr Rā's assessment is tightly focused on these matters and she has not undertaken the wider ranging type of assessment undertaken by Mr Brown. Dr Rā and Mr Brown agree that views to the Kaimai Ranges are significant to Whareroa Marae and Ngāti Kuku, and that the values associated with this are affected by the permitted activities within the existing container terminal.	the profile and form of the Kaimai Range. In relation to this question, Mr Brown considers that the focus is upon Whareroa Marae's views to, and relationship with, the Kaimai Ranges, and it does not address the wider surrounding environment around that viewshaft. These latter matters are addressed in relation to question 4. Mr Brown considers that the 'Kaimai Ranges viewshaft' focuses on those distant ranges visible above Whareroa Bridge. Dr Rā considers the viewshaft to be the extent that is shown in Viewpoint 1. Dr Rā considers that Viewpoint 1, be it either Attachment 21A (and associated photomontage 21G) or Attachment 21B 'Viewpoint 3' (and

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			associated photomontage 21E) must consider these views as full 'viewshafts' in the direction of the Kaimai Ranges, as the images illustrate. With this she notes that impacts on the Kaimai are not solely about visual obstruction to the ranges themselves, but the effect on the visual experience by these audiences, noting the sensitivity of this receptor audience and their association with this viewshaft in full. Whilst stacked containers create a direct visual obstruction of the Kaimai, the lattice-like cranes are a source of considerable disruption to visual amenity of the viewing audience. Given the sensitivity of the receiving audience, the values associated with this view, the episodic nature of the visual changes and the overarching magnitude of change to this view, she considers visual effects from

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			this viewpoint to be at the upper end of the scale, and therefore High. Dr Rā further notes that no discussions have occurred between the Assessor and the Applicant to consider operational changes to the design of the proposal to mitigate effects or seek alternative lower impact solutions. Mr Brown has considered a wide range of factors in determining the levels of effect identified in pages 65-66 of his assessment and considers that he has had regard to the cultural aspects of that assessment to the extent that he was able to. Mr Coombs' is in general agreement with Mr Browns' position on this matter.

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4. The landscape, visual, and natural character effects of the Project in relation to Whareroa Marae;	<u>Landscape effects</u> Mr Brown addressed the wider landscape effects of the proposed Port expansion, taking into account Viewpoint 1 and the wider Marae surrounds. He had particular regard to the impact that existing and permitted development within the Sulphur Point Container Terminal has on its landscape setting, including Stella Passage and the Kaimai Range. In addition, he took into account other factors, including: - The visual presence of the proposed cranes, berths, shipping, lighting, etc.; - The nature of views towards Stella Passage at present and the structural content already found in those views; - The way in which Whareroa Marae is already hemmed in by industrial		Mr Brown considers that the additional effects of the proposed Port expansion would be of a low order, but other factors elevate the level of landscape effect overall to a moderate level for Stage 2 (p. 65-66 of the Brown NZ Ltd assessment dated March 2025). Mr Coombs' is in general agreement with Mr Browns' position on this matter.

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	development on three sides; and - The very limited potential for further mitigation of any additional effects generated by the Port expansion (beyond POTL's withdrawal of its fuel jetty proposals for the area near Butters Landing). Mr Brown also had regard to local iwi management plans as they relate to Te Awanui and written histories of the Tauranga area and harbour. Dr Rā considers that Mr Brown has not been afforded the full opportunity to understand Ngāti Kuku landscape values as a result of the application process and having not yet considered the CVA and CIS. As a result, it is Dr Rā's position that the landscape		

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	effects assessment is not able to make full judgement of the effects. Effects judgements are unknown until that process has been completed. Dr Rā as the mana whenua appointed pukenga has not been commissioned to undertake an independent assessment. <u>Natural Character Effects</u> Mr Brown took into account the current, highly modified, state of Stella Passage, together with the high values attached to Te Paritaha banks and much of the rest of Te Awanui. He then used the scientific analyses undertaken by the Port of Tauranga's other experts to examine the effects of the proposed Port expansion on those the biophysical values of those areas. Mr Brown was also aware of concerns expressed by		

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	local iwi about the management of the harbour in various iwi management plans and other documents, including concerns about kai moana in relation to Te Paritaha. Dr Rā considers again that Mr Brown has not been afforded the full opportunity to understand Ngāti Kuku use of the coastal systems for the purposes of mahinga kai and undertaking cultural practices. As a result of this, Dr Rā considers that the natural character base has been understated and is not of very low natural character from the perspective of Ngāti Kuku. Following this, judgements of effects on this natural character are also understated as a result. The Bay of Plenty Regional Council Regional Policy Statement (RPS) states that Waipu Bay		

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	immediately adjacent to Whareroa Marae is of High natural character (p. 22, Fig. 14 in Brown NZ assessment). Mr Brown clarified that the rating of very low natural character was confined to Stella Passage, not to the rest of the harbour, although he has taken into consideration the natural character ratings in the RPS. None of the technical assessments undertaken for the Port of Tauranga have to Mr Brown's knowledge suggested that the proposed extension would have any appreciable (more than minor) biophysical effects on Waipu Bay, including near Whareroa Marae.		
5. Cumulative landscape and natural character effects in relation to Whareroa Marae; and	<u>Landscape Effects</u> Mr Brown's assessment fully recognises the way in which existing industrial, port development and transport		Dr Rā has been made aware of new information received by Mr Brown on the 4 th June 2026 regarding the permitted activities that include 18 automated

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	infrastructure encloses Whareroa Marae on three sides and diminishes both its landscape and amenity values. His assessment further recognises that Stage 2 of the proposed Port expansion, in particular, would exacerbate this situation and that is the main reason for the identification of a moderate level of effect in relation to Viewpoint 1 and Whareroa Marae. <u>Natural Character Effects</u> The natural character of Te Awanui has been substantially modified, particularly since 1969 with the commencement of works on Sulphur Point. The proposed Port expansion would have biophysical effects, especially in relation to Stella Passage. However, that passage is already the most heavily modified part of Tauranga Harbour and the		stacking cranes (up to 35 m high rising above the container stacks). She expresses concern regarding the cumulative effects on the viewshaft from Whareroa Marae towards the Kaimai Ranges when taking into consideration all permitted activities alongside the application proposal and notes that there is no discussion within the existing assessment on the extent of visibility of 18 automated stacking cranes, nor is this illustrated within the existing photo montages. Dr Rā notes that sections 6.30, 6.48 and 6.54 of Te Tangi a te Manu are relevant. Mr Brown pointed out that automated stacking cranes were shown on p.9 of his assessment, and ‘POTL’s movement towards the introduction of such a system’ is referenced on that same page.

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	biophysical effects identified in relation to both it and the wider harbour appear likely to be of a low to very low order. Consequently, the additive effects of the current expansion proposals would be very limited in Mr Brown's view. <u>Landscape and Natural Character Effects</u> Dr Rā considers that, for both landscape and natural character, a cumulative effect is not rendered insignificant simply because landscape and amenity values of the receiving environment have already been progressively diminished. This is not merely a matter of percentage of change. Instead, she considers that additive or incremental change, and each additional encroachment in an already heavily compromised cultural		Mr Coombs' is in general agreement with Mr Browns' position on this matter.

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	landscape represents a proportionally greater erosion of the values that remain. Instead, she considers that additive or incremental change, and each additional encroachment represents a proportionally greater erosion of the values that remain.		
6. Adequacy of proposed draft conditions to address above;	Mr Brown and Mr Coombs consider that there did not appear to be any logical conditions of consent, or related measures that that would meaningfully mitigate the proposal's landscape effects, other than those identified in the Brown NZ assessment (p. 108-109). Mr Brown and Mr Coombs have no further comments on the adequacy of the proposed draft conditions.		

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	Dr Rā advised that Ngāti Kuku reserve the right to have further input if they so wish into the drafting of conditions outside of the landscape planning joint witness conferencing.		
7. Any further amendments to proposed draft conditions to address above.	See above.		

Attachment 1

Stella Passage Fast Track Approval Act Application Landscape Witness Conferencing

17 July 2026

Qualifications and experience of Brad Coombs

1. My name is Braddyn (Brad) Thomas Coombs. I am a Principal Landscape Architect at Isthmus Group Limited (IGL), with 29 years of professional experience in New Zealand and the United Kingdom. I have qualifications of Bachelor of Horticulture (Massey University 1995) and Bachelor of Landscape Architecture (Lincoln University, 1997) and am a Registered Member and Fellow of the New Zealand Institute of Landscape Architects Tuia Pito Ora, as well as being a past President (2018-2021).
2. I have experience in undertaking landscape assessment for consent applications for Roads of National Significance, several renewable energy generation projects, including geothermal power stations, wind farms and solar farms, and new transmission lines and substation upgrades for Transpower and local lines companies. Specific coastal development experience includes wharves, jetties, boat ramps and coastal protection structures, several of which are in the Bay of Plenty.
3. I have lived and worked from a base in Tauranga for more than 20 years and have worked on local projects in Tauranga and Mount Maunganui, including reviewing the landscape assessment report for the Port of Tauranga Stella Passage expansion for the Environment Court Direct Referral application in 2022 and a pre application draft landscape assessment report for the Fast Track Approvals Act application in March 2025. I am familiar with the Port of Tauranga and the Tauranga Moana environment.

Code of conduct

4. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I participated

in witness conferencing in compliance with that Code, as if it were to assist Environment Court proceedings. In particular, unless I state otherwise, my participation is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.