

under: the Fast-track Approvals Act 2024

in the matter of: an application for resource consents, approvals and a notice of requirement to alter a designation, to construct a four-lane, median divided highway to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, known as 'Takitimu North Link - Stage 2'

applicant: **NZ Transport Agency Waka Kotahi**
Requiring Authority and Applicant

Statement of Evidence of **Adrian Morton** for NZ Transport Agency Waka Kotahi

Dated: 16 December 2025

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STATEMENT OF EVIDENCE OF ADRIAN MORTON FOR NZ TRANSPORT AGENCY WAKA KOTAHI

- 1 My full name is Adrian Duke Morton.
- 2 I am the director of Adrian Morton Landscape Architects. I have practised as a landscape architect for 29 years. An overview of my relevant experience and qualifications is set out in the Landscape Visual Impact Assessment (LVIA) lodged with the Application.¹
- 3 I have been involved in the Project since early 2017. I am the author of the LVIA lodged with the Application.

CODE OF CONDUCT

- 4 Although this matter is not before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses as contained in section 9 of the Environment Court Practice Note 2023. I agree to comply with that Code. My qualifications as an expert are set out above. I am satisfied that the matters which I address 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.

SCOPE OF EVIDENCE

- 5 I have read the comments on the Application made by Western Bay of Plenty District Council (WBOPDC)² as they relate to landscape and visual matters and the LVIA lodged with the Application. I understand WBOPDC's expert generally agrees with the conclusions in my assessment, the recommended mitigation in the LVIA and NZTA's Proposed Designation Conditions.
- 6 However, WBOPDC's comments raise some concerns with the approach taken in my assessment as documented in the LVIA. My evidence has been prepared to support the NZ Transport Agency Waka Kotahi's (NZTA) response to those comments, specifically in relation to:
 - 6.1 Application of the Te Tangi a Te Manu: Aotearoa New Zealand Landscape Assessment Guidelines;
 - 6.2 The assessment of effects relating to cultural landscape and values;

¹ Appendix 9.4.5, [Landscape Visual Impact Assessment](#).

² Made pursuant to s53 Fast-track Approvals Act 2024.

- 6.3 The assessment of effects relating to effects on outstanding natural landscape and natural character;
- 6.4 Reliability of the zone of theoretical visibility (ZTV) and corresponding visual amenity effects; and
- 6.5 Assessment of effects on a cultural hill.

Assessment of effects relating to cultural landscape and values

- 7 WBOPDC's peer reviewer, Mr Simon Button, notes my assessment contains limited assessment or acknowledgement of the potential associative effects related to cultural landscapes and values.³ In my opinion it is beyond my remit to be able to properly and accurately assess and describe the cultural relationship that hapū have with the landscape. I appreciate that Māori have an intrinsic connection, which is complex and cannot be adequately measured or evaluated by external (Western), frameworks, that tend to separate cultural values from the physical environment. Imposing external metrics risks trivialising or misinterpreting the depth of this relationship.

Application of the Te Tangi a Te Manu: Aotearoa New Zealand Landscape Assessment Guidelines

- 8 Mr Button suggests that, while my assessment methodology is "broadly consistent" with the Te Tangi a Te Manu Landscape Assessment Guidelines (*Guidelines*), in his opinion there are departures and inconsistencies with the guidelines.⁴ However, I consider that the LVIA provides a robust assessment of the landscape and visual effects associated with the alteration to designation and is in general accord with the Guidelines.

Assessment of effects on outstanding natural landscape

- 9 Mr Button raises concerns regarding the Project and borrow pit in relation to the Outstanding Natural Landscape (ONL), S8 and S8a, and the Coastal Outstanding Natural Features Landscape (ONFL) asserting that the LVIA fails to assess the relevant landscape values or address the potential effects, particularly those associated with the borrow pit and its remediation.⁵
- 10 The indicative alignment in Areas 1 and 2 lies within the 300-metre setback of the ONL but remains outside the Coastal ONFL. At both locations, the carriageway works are effectively contained by intervening topography and vegetation, with landscape mitigation measures providing extensive rehabilitation to further screen and integrate the completed works. The concept planting plans, while

³ [Landscape Peer Review](#) – Takitimu Northern Link Stage 2, Simon Button, 21 November 2025, Paragraph 22, Table #46.

⁴ Paragraph 10.

⁵ Paragraphs 37-38.

indicative, also demonstrate substantial ecological mitigation in both Areas 1 and 2, enhancing and restoring wetland and stream environments that connect with the ONL and harbour landscapes. In my opinion, the assessment of the indicative alignment and proposed mitigation measures confirms that the ONLs will not be adversely affected, and that the established planting will deliver a positive outcome for landscape character and visual amenity in these areas.

- 11 In relation to the borrow pit, the location of potential fill material has been identified, but the size and extent of the potential borrow pit within ONL S8a (or whether a borrow pit in this location will eventuate) cannot be confirmed, and its requirement and extent will be determined once the detailed design process commences.
- 12 If the borrow pit is required, the landscape and visual effects will be confined to the extraction period, with effects primarily associated with the temporary open pit environment. Topsoil will be stripped and stored around the perimeter, assisting in containing visual effects during operations. Upon completion, the pit will be reinstated through landform profiling to integrate with the surrounding area, with topsoil reinstatement enabling the area to be returned to a pastoral environment or other productive use. In my opinion, the rehabilitated landform will be consistent with the wider landscape character and will result in less than minor landscape and visual effects on the ONL and broader landscape.

Assessment of effects on natural character of streams and wetlands

- 13 Mr Button raises the concern that a more detailed level of assessment should be undertaken for each of the existing streams and wetlands, in order to accurately evaluate the potential effects on their natural character within the proposed designation under section 6(a) of the Resource Management Act 1991 (*RMA*).⁶
- 14 As indicated by Mr Button, my LVIA report provides a number of descriptions and analysis of effects, in relation to streams and wetlands⁷ that combine to provide an overall rating of areas along the indicative alignment. The majority of these features are characterised as highly modified and degraded, primarily as a result of stock grazing practices. In my opinion, such degraded and modified landscape features indicate that the biotic components (flora, fauna and biodiversity), and to some extent the abiotic components (water quality, physical processes, and connectivity), possess limited intrinsic character and contribute only marginally to the overall landscape values of the area. The exceptions identified in

⁶ [Landscape Peer Review](#) – Takitimu Northern Link Stage 2, Simon Button, 21 November 2025, Paragraphs 26-28.

⁷ Appendix 9.4.5, [Landscape Visual Impact Assessment](#), Section 5.4

my report are the Merrin Wetland and Te Puna Stream, both of which exhibit stronger ecological characteristics.

- 15 In my opinion, my assessment is sufficient to evaluate the effects, having been informed by the low-quality landscape characteristics of the streams and wetlands. In addition, the Ecological Effects Assessment⁸ provides an appropriate level of technical analysis to determine the biotic and abiotic status of these features, confirming their degraded condition and setting out recommendations to enhance stream character and biodiversity. Overall, I consider that the proposed ecological interventions, which are assessed as achieving a *moderate to high* beneficial outcome are correct. The landscape and ecological proposals to restore the streams and wetlands will improve these features. Noting the Application is being processed under the Fast-track Approvals Act 2024, which I understand has a different legal framework and requirements to the RMA, in my opinion the Project's landscape and ecological proposals uphold the requirements of Section 6(a) of the RMA.

Reliability of the zone of theoretical visibility and visual amenity effects

- 16 In Mr Button's review, he comments on the accuracy and reliability of the ZTV, raising particular concerns regarding the 300-metre extent of the ZTV and the potential visibility of properties located at elevated locations. He also provides alternate assessment ratings on a number of properties.⁹
- 17 In my opinion, the ZTV analysis is a useful tool that combines desktop assessment with field verification to illustrate potential visibility, and it should not be regarded as absolute. Based on extensive walkovers and ground assessments, I consider the 300-metre zone to be an appropriate extent for identifying properties where visual effects of the Project may be discerned. Beyond this distance, vegetation, topography, and increasing separation serve to diminish potential effects to a level that is less than minor in relation to the alteration to the designation. In regard to Mr Button's alternate assessment ratings, these are generally consistent with those in my assessment, and none differ to an exceptional degree. I remain comfortable with my initial assessment and note that Mr Button broadly agrees with the levels of effects identified and acknowledges that the effects are appropriately characterised.¹⁰

Assessment of effects on a cultural hill

- 18 In his review document, Mr Button references the 'hill feature' (ID#29), identifying the landform as part of the cultural landscape of

⁸ Appendix 9.4.4, [Ecological Effects Assessment](#).

⁹ [Landscape Peer Review](#) – Takitimu Northern Link Stage 2, Simon Button, 21 November 2025, Paragraph 33.

¹⁰ Paragraph 34.

Te Haumu. As this feature lies within the area subject to the alteration to designation, it will likely be removed to accommodate the geometric alignment of the carriageway. Mr Button notes that he is unclear what measures have been considered to avoid, remedy, or mitigate the loss of this feature.¹¹

- 19 A site visit and discussions with Pirirākau hapū have been undertaken to understand the significance of the knoll and to review the alignment to avoid the features. As stated during the site meeting with hapū, the integrity of the cultural hill site would be compromised with any cut within the vicinity, as from a cultural perspective the hill and the area surrounding it is inclusive. Therefore, further investigation was undertaken to see if the geometric alignment could be achieved to avoid cuts or removal of areas surrounding the knolls. However, I understand that, due to the geometric and safety requirements, the ability to avoid the hill without cutting into the feature is not achievable.
- 20 I understand discussions have been undertaken with Pirirākau in relation to mitigation, with Pirirākau providing a range of suggestions (some redacted / confidential). However, building on Stage 1's 'ecological and cultural' corridor, Stage 2 will continue to work collaboratively with hapū to develop opportunities that may include free-standing cultural markers, design patterns integrated into bridge abutments and barriers, and contributions to cultural planting typologies. These measures are intended to mitigate cultural effects by strengthening the character of the corridor and reinforcing its cultural associations with the area.

Conclusion

- 21 In summary, I consider the methodology and approach taken in my assessment to be appropriate and in accordance with current best practice and guidelines. I reaffirm the findings of that assessment as documented in the LVIA.¹²
- 22 Overall, I consider the Project's cultural, landscape, ecological, and visual outcomes are supported by robust mitigation that will combine with Tangata Whenua involvement during the detailed design stage and the development of the LVMP. This will ensure that residual effects will be less than minor, while delivering positive outcomes for landscape character, ecological restoration, and cultural integrity.

Adrian Morton
16 December 2025

¹¹ Paragraph 44.

¹² Appendix 9.4.5, [Landscape Visual Impact Assessment](#).