

**BEFORE A HEARING PANEL  
CONSTITUTED BY HORIZONS REGIONAL COUNCIL**

*IN THE MATTER OF* an application dated 21 December 2020  
for regional consents by Grenadier  
Limited to develop the Douglas Link  
Golf Course at 765 Muhunua West Road,  
Ohau

*IN THE MATTER OF* Part 6 of the Resource Management Act  
1991

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**STATEMENT OF EVIDENCE OF FRANK BOFFA**

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## Section A – Introduction

### *Name, qualifications and experience*

- [1] My full name is Frank Boffa. I am a Past President of the New Zealand Institute of Landscape architects, and I am a Life Member of the Institute. Following my retirement from Boffa Miskell 10 years ago, I have continued to work part-time as a self-employed Landscape Architect.
- [2] My qualifications include a Diploma in Horticulture from Lincoln College (now Lincoln University) and a Bachelor of Landscape Architecture Degree from the University of Georgia, USA. In 2007, I was awarded an Honorary Doctorate in Natural Resources from Lincoln University.
- [3] During my 50 year professional career, I have been involved in many projects. I have prepared Landscape Management Plans, Mitigation Plans, and Landscape Rehabilitation and Restoration plans for sensitive areas and sites. I have also acted as a Hearings Commissioner on many occasions where landscape, natural character or visual effects have been a significant factor. I also have Peer-Reviewed applications for both Applicants and Consent Authorities.
- [4] In recent years I have carried out a range of RMA strategic and policy assessment reviews for Regional and Local Authorities, specifically within the Coastal Environments of the greater Wellington, Nelson, Tasman and Marlborough areas.
- [5] I am a member of the Paraparaumu Beach Golf Club, and while I am no more than an average golfer, I understand the game and know about Links courses in particular. I have also worked on several golf course redevelopment projects in my professional career, including the Royal Wellington, Masterton and Berhampore golf courses. I was also involved in the planning, designing, and construction of the Royal Park course in Beijing, China.

*Expert Code*

- [6] While this is not an Environment Court hearing, I have met the standards in that Court for giving expert evidence.
- [7] I have read the Code of Conduct for expert witnesses issued as part of the Environment Court Practice Note 2014 (Part 7). I agree to comply with the Code of Conduct. I am satisfied that the matters addressed in this statement of evidence are within my expertise. I am not aware of any material facts that have either been omitted or might alter or detract from the opinions expressed in this statement of evidence.

*Role in Project*

- [8] In August 2020, I was engaged by Grenadier Limited to assist with the preparation of the Resource Consent documentation for an application for consent to construct and operate a links golf course on the Horowhenua Coast on the southern side of the termination of Muhunua Road West at Ohau.
- [9] Specifically, I was asked to review, assess and report on the landscape, natural character and visual effects of the proposed links golf course. Following my initial assessment, I have been assisting Grenadier and their consultants on various aspects concerning the site's protection, enhancement, rehabilitation, landscape management and, more particularly, the dune landscape within the coastal environment. Being a resident of the Kapiti Coast for some 40 years, I am familiar with and have worked on many conservation and development projects in the region's wider coastal environment.
- [10] During my work for Grenadier, I have visited the site on at least 4 occasions. I prepared the Douglas Links Golf Course – Ohau Landscape Assessment dated December 2020, included with the Resource Consent Application.

*Scope and purpose of Evidence*

- [11] My statement of evidence will cover the following matters
- (a) A review of the landscape framework used in my 2020 Landscape Assessment Report.
  - (b) The summary and conclusions reached in my 2020 Landscape Assessment Report.
  - (c) The restoration of natural character in the coastal environment.
  - (d) My response to Public submissions and the Horizons Regional Council Section 42A Reports.
  - (e) Summary and conclusions.

**Section B – Evidence***Landscape Assessment Framework*

- [12] Following the Resource Management Act (RMA), the Horowhenua District Council aligned its landscape classifications and identification of landscapes and natural character with the relevant provisions of the New Zealand Coastal Policy Statement 2010 (NZCPS), the Regional Policy Statement and the One Plan. Accordingly, and in the context of the Douglas Links Golf Course site, the coastal edge, including the foredunes and some of the adjacent stable dunelands, have been identified in the District Plan as an Outstanding Natural Feature and Landscape (ONFL). The coastal dunes have also been identified as having a high level of Natural Character. No section of the coastal environment adjacent to the site was classified as having very high or outstanding Natural Character. In addition, the Coastal Environment has been identified as having a high amenity value.
- [13] The District Plan also recognises the vulnerability of the coastal dunes, their characteristic topography, their visibility and visual qualities and their

susceptibility to modifications. While the planning provisions and, in particular, the New Zealand Coastal Policy Statement seek to identify and protect areas of high value, they also actively seek to promote rehabilitation, restoration, enhancement and the sensitive management of landscapes, natural character and biodiversity within the Coastal Environment.

[14] In my 2020 Landscape Assessment Report, I focussed on the Horowhenua District Council Plan provisions related to the Land Use Consent, and more specifically on outstanding natural features and landscapes, natural character and visual effects. Following on-site inspections, I suggested some minor revisions be made to both the outstanding natural feature and landscapes and the natural character boundaries within the proposed golf course site to reflect better recent agricultural changes that had occurred subsequent to the District Plan boundaries that have been in place for the past 10 years. The Regional Council has not questioned the revised site boundaries but has raised some matters concerning the effects of biodiversity on landforms and habitat within the coastal dune environment. I understand the Horowhenua District Council accepted my landscape assessment, including the boundary refinements recognised in the current Land Use Consent.

[15] After preparing my initial assessment, I have been working with Dr Keesing and the biodiversity team on various aspects related to the protection, reinstatement and enhancement of natural character and biodiversity within the coastal dunes. That is discussed further under the heading of 'Restoration and Natural Character' in my evidence. Notwithstanding this, I will briefly comment on my landscape assessment and the conclusions I reached in my 2020 Landscape Assessment Report, which the Horowhenua District Council have accepted.

#### *Landscape Assessment*

[16] Based on my assessment of the site in the context of its coastal setting, the relevant statutory provisions of the District Plan, and the proposed layout of the links golf course, I reached the following conclusion-

(a) That in terms of landscape considerations, the proposed development-

- Has taken into account the Coastal ONFL classification and provisions and has had regard to other landscapes having high amenity.
  - Has proposed to initiate, implement and maintain landscape restoration and biodiversity values throughout the site.
  - Has respected the landscape's ability to absorb and accommodate appropriate activities and development within the site.
  - Has ensured and demonstrated that adverse effects on significant dune landforms have been avoided, remedied or mitigated.
  - Will protect, expand and manage areas of significant indigenous vegetation and habitat.
- (b) That in terms of Coastal Environment considerations, the proposed development –
- Will preserve the natural character of the Coastal Environment.
  - Will increase and enhance the levels of natural character throughout the site.
  - Recognises and respects the sensitivities and dynamics of the coastal dune landscape.
  - Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.
- (c) That in terms of visual effects considerations, the proposed development –
- Will not create adverse visual or amenity effects from locations within or beyond the site.

- Will enhance the visual amenity of the landscape in the context of its coastal setting.

#### *Conclusion on landscape effects*

[17] Based on the above, I concluded that the proposed Douglas Links Golf Course will –

- Have no adverse effects on the environment that cannot be readily mitigated, and will in fact, enhance the landscape character, biodiversity habitat and the amenity values of the coastal landscape.
- Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly along the coastal margin.
- Will protect and enhance natural character values throughout the site.

#### *Restoration of Natural Character*

[18] As noted this has been a collaborative process between Grenadier, Dr Keesing and me.

[19] Policy 13(i) of the New Zealand Coastal Policy Statement seeks to “preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use and development”. Policy 6.2 of the Regional Policy Statement seeks to achieve the same outcomes. Notwithstanding this, Policy 14 of the New Zealand Coastal Policy Statement also seeks to “promote the restoration or rehabilitation of the natural character of the coastal environment”. Likewise, Policy 6.2(c) of the Regional Policy Statement also seeks to “protect areas of significant vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity, including enhancement.”

[20] While the 2012 Natural Character Assessment of the Horowhenua Coastal Environment rated the Douglas Links coastal area as having high natural character overall, the vegetation/ habitats, biodiversity and natural systems



and processes were individually noted as being moderate, mainly due to the presence of exotic pines, macrocarpa, woody weeds and the effects of recent land-use activity.

[21] Given the somewhat degraded nature of the site, more particularly inland of the foredunes, I have worked on natural character restoration proposals with Dr Keesing, who has carried out extensive and detailed ecological assessments of the site. Dr Keesing's work is documented in his October 2021 Ohau Proposed Golf Course Ecological Assessment and his more recent March 2022 Douglas Links Restoration Plan. I fully endorse and support his ecological assessment and his proposed restoration work.

[22] A proper Links golf course is located on the coast, where all golfers are tested and forced to work with the natural elements. In conjunction with the golf course designers and the construction team who have sought to minimise earthworks, along with Dr Keesing's March 2022 Restoration and Management Plan, and the commitment and resources available to Grenadier Limited, I consider the Douglas Links Golf Course to be a well-conceived and developed facility and one that will be appropriate in its particular coastal environment setting.

[23] I also observe that there are few, if any, other uses or activities that might be appropriate in this particular area where rehabilitation and restoration - and, more importantly the ongoing management and enhancement of the coastal environment - could be achieved. Especially uses that at the same time meet the relevant objectives and provisions of the New Zealand Coastal Policy Statement, the Regional Policy Statement and the Horowhenua District Plan.

#### *Response to Submissions*

[24] I have reviewed the public submissions and have no further comments to add on matters relevant to my area of expertise.

*Section 42A Reports*

- [25] I have read the Section 42A Reports, and other than several matters concerning the Ecology Technical Report, I have no further comments to make.
- [26] Given that the proposed Links course is in part within the coastal environment, both Dr Keesing and Mr Whiteley seek to protect biodiversity, avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects. Policy 11 of the New Zealand Coastal Policy Statement seeks to protect indigenous biodiversity in the coastal environment and avoid significant adverse effects. In contrast, Policy 13 seeks to preserve the natural character of the coastal environment from inappropriate subdivision, use and development.
- [27] While I am unable to comment with authority on specific 'at risk habitats', ecological values and/or effects; it appears to that there are several relatively minor differences of opinion between Mr Connor Whiteley and Dr Vaughan Keesing. These differences can be sensibly and adequately addressed and managed by way of appropriate mitigation measures and/or conditions
- [28] I make the following observations on the nature, scale and magnitude of coastal dune earthworks, vegetation clearance and disturbance which Mr Whiteley comments on in paragraphs 33 - 37 of his report.
- [29] Dr Keesing has provided information on the nature and extent of vegetation clearance in both the coastal dune area within the Douglas Links site, being 2.12ha or 13% of the 16.12ha within the entire site's coastal dune system, and which, at a broader scale equates to 1.7% of the area from the Ohau River mouth to the Waiwiri Stream further to the north of the site, Mr Whiteley considers these effects to be greater than those assessed by Dr Keesing.
- [30] In terms of landscape and natural character effects, I consider that while there will be a visible change to elements and sections of the coastal dunes, the impact of this can be managed. It will be perceived more as a landscape change rather than an adverse effect, just as the removal of pines and macrocarpas would be seen as a change in the appearance of the landscape

rather than an adverse effect. I also consider that in real terms, there will be no loss of dunes as such or a conversion to something quite alien or “unnatural”. In a Links golf course along the lines proposed, natural elements, natural patterns and natural processes will continue to be dominant, the only difference being that while the coastal dunes will essentially be retained and, in some cases enhanced, some localised vegetation patterns and associated habitats will be modified and will appear different, albeit with a natural character. In the context of the site and the management of the coastal dunes, I see this as a positive benefit and enhancement rather than an adverse effect. Indeed, in the longer term, I anticipate the coastal dune system will be considerably enhanced and better managed following the planned restoration and rehabilitation of the coastal dunes within the Douglas Links site and the adjacent foredunes.

- [31] Accordingly, from a natural character perspective, I consider the Restoration and Management Plan prepared by Dr Keesing to be a positive measure that will promote and rehabilitate natural character values as envisaged by Policy 14 of the New Zealand Coastal Policy Statement. While there may be effects on ‘at risk habitats’, I consider these can be appropriately managed by the measures outlined in the Restoration and Management Plan and appropriate conditions.

#### *Summary and Conclusions*

- [32] From a landscape, natural character and visual perspective, I confirm my initial assessment conclusions that the Proposed Douglas Links Golf Course will –
- Have no adverse effects on the coastal landscape that cannot be readily mitigated and which, in my opinion, will enhance the landscape, natural character and visual amenity values of the coastal landscape.
  - Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly in the coastal environment.

- Will protect, enhance and manage natural character values throughout the Douglas Links Golf Course site.

[33] I consider that the Douglas Links Golf Course will be a well-conceived and planned feature that will be an appropriate activity in the coastal environment and integrate seamlessly into its coastal dune setting, recognising:

(a) the Links course designers and the specialist construction team have sought to minimise earthworks and integrate the course layout into its coastal environment setting;

(b) the commitments made and the resources available to Grenadier Limited.

[34] I also consider that there are few other uses or activities that would be appropriate in this particular coastal environment setting, where restoration and, more importantly, ongoing management and enhancement actions will meet the aspirations and expectations of the New Zealand Coastal Policy Statement, the Regional Policy Statement and the Horowhenua District Plan.

Dated 12 April 2022

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Frank Boffa