

LANDSCAPE AND VISUAL ASSESSMENT REPORT – PEER REVIEW

PROPOSED SUBDIVISION – 98C ŌHIWA HARBOUR ROAD (ONEKAWA ROAD), ŌHIWA.

Kim Goodfellow - Registered Landscape Architect NZILA

The Goodfellow Group Ltd

02nd August 2022

INTRODUCTION

The application proposes to subdivide the existing 7.1201ha site into 13 lots. The site is located on a headland that forms the eastern boundary of Ōhiwa Harbour as illustrated below (image source: Council Geoview).

The applicant's submission included a Landscape and Visual Assessment (LVA) prepared by Greenwood Associates dated 22 April 2022 comprising of:

- Introduction,
- Methodology
- Existing environment
- Proposal
- Assessment of Effects
- Assessment of the proposal against the District Plan
- Conclusions
- Visual simulations package

The LVA is the subject of this peer review including the Response to ODC S92 Request – RC2022-47 from Council.

This peer review was prepared during July 2022 and included a site visit to Ohiwa on 22nd July 2022.

This peer review takes into account only the information provided by the applicant and council, and is otherwise based on observations made during the site visit.

A number of aspects of the LVA, landscape design and graphics which are considered unclear and have made it difficult for this review to be conclusive. During this review process certain matters were raised with the Applicant and some were responded to adequately, while others not so. Further information has been requested to help achieve a clearer understanding of the proposal and the LVA. In this regard the list of items below are considered pertinent to the LVA assessment:

- On the visual simulations dashed lines represent the proposed houses which are 'behind' the planting. This will be not a realistic portrayal of what will be seen on site.
- An additional visual simulation was requested from Ōhiwa Spit (explained in the following visual effects section of this review) to better determine the potential landscape and visual effects.
- We have requested confirmation on the levels of the building Lots 1 to 7 illustrated in VP4. These buildings appear to be shown too low on the slope when observed during the site visit and therefore are not congruent with my observations.
- Base photographs used in the preparation of the VP location plan are not current.
- Focal lengths used in the visual simulations were not consistent (35mm and 55mm) and not compliant with standard best practice which requires a 50mm focal length - widely considered most comparable to the human eye.
- Buildings shown on the Applicants proposal plan 'J001233/03 'Building Locations' depict all dwellings to have a uniform 10m x10m footprint. This box-like uniformity in building design is not considered realistic given the variance in site conditions and topography, anticipated desire to utilise particular vistas, and does not allow for some level of variation in building styles across all the dwellings.
- The retention of existing avocado trees is a key feature of the landscape design which provides some amenity and seeks to achieve a level of consistency with the surrounding rural character. However it is unclear how reliable retention of these trees are as a landscape mitigation measure over the longer term. Such fruit trees may be undesirable to individual residents and removed, and some tree positions seem to be in either conflict with proposed buildings or in such close proximity that may be unpractical.
- The interplay of existing and proposed planting is an important consideration for landscape and visual effects. We have sought clarity to better understand this issue, including the height that existing shelter-belts would be maintained at, and how they would be maintained. These queries have yet to be fully clarified.

This report gives review comments on the LVA, discusses its methodology, findings and conclusions. For the sake of conciseness, this report does not repeat the aspects of the LVA that are agreed with. The peer review identifies where more explanation is required in relation to missing information and raises issues that would benefit from further information, which if provided are likely to further resolve key points of disagreement.

In accordance with *Aotearoa Landscape Assessment Guidelines (final version April 2021)* this peer review is structured under the following subheadings

- Purpose, methodology and definitions
- Existing landscape
- Proposal
- Statutory planning provisions
- Design response
- Public submissions
- Conclusions

PURPOSE, METHODOLOGY AND DEFINITIONS

The LVA follows best practice and is clear and adopts an appropriate methodology for assessment.

EXISTING ENVIRONMENT

Relevant Statutory Context

The LVA does not mention section 7(f) or (c) of the RMA, in regards to **“the maintenance and enhancement of the quality of the environment”** and **“the maintenance and enhancement of amenity values”**. These matters should be discussed in the LVA, in terms of the sensory aspects of landscape character and in reference to rural character and the Coastal Environment including the adjacent Ōhiwa Harbour.

Permitted Baseline

In terms of potential LV effects, this review does acknowledge the reality that under the current rules and policies of the District Plan the Applicant could develop the proposed site in a manner that has much higher landscape and visual effects than what is currently proposed, for example clear the site and build 2 x 9m high dwellings, with little consideration to vegetation treatments or external colours and finishes of the new buildings. The potential landscape and visual effects of such a proposal are considered likely be worse.

It is clear that the Applicants current proposal which provides 9 x new dwellings onto the site does present challenges when considering landscape and visual matters. In addition, the Applicant is currently proposing further measures which will help to reduce potential adverse effects in terms of building design/planting etc, and this is seen as positive. The review does identify aspects of the current proposal and LV assessment which are unclear or require further clarification or thought, and in following this process the review seeks to further reduce potential adverse effects on the immediate landscape and receiving environment.

Landscape Character

The ‘receiving environment’ is an extent that can be mapped or defined where a proposed activity might have potentially adverse effects. The LVA does not determine the receiving environment for the proposal and it is considered important that the receiving environment is defined.

The receiving environment for the proposal will likely include Ōhiwa Harbour to the west, and the Waioatahe River and Estuary to the east. Both of these features are identified as Outstanding Natural Features and Landscapes (ONFL) and Indigenous Biodiversity A (IBDA-A) sites in the Regional Coastal Environment Plan (RCEP). The Ōhiwa Harbour and Waioatahe Estuary have **Outstanding Natural Character** in the Regional Policy Statement (RPS) as illustrated in the Appendix of this review.

While the Application site is located outside of the Coastal Environment and ONFL areas (refer images contained in the Appendix of this review), the coastal headland and ridgeline is an integral part of the Harbour character. This surrounding landscape context and the underlying values of the Coastal/ONFL areas are important when considering potential landscape effects since the application site and ridgeline are a part of the wider coastal environment and has the potential to adversely affect the values of this area. Such natural environments are sensitive to adverse effects when introducing landscape elements that are incongruent, e.g. inappropriate or excessive residential subdivision. This is especially important with proposals on elevated ridgelines or skylines that are not consistent with their surroundings. On such prominent ridgelines the detail of a proposal matters considerably in terms of the built form – e.g. the colour and detail of buildings

external surfaces, the reflective qualities of windows - and especially the density of the individual built forms themselves.

For this reason, it is considered that the LVA would have benefited from a section discussing any potentially adverse effects on the area of Outstanding Natural Character and its values in regard to the provisions of the RPS including changes to land cover and land use, and any effects on perceptual attributes and elements as per Appendix J of the RPS (Natural Character Attributes).

The LVA classifies the landscape character of the site and its surrounds as *rural-residential*. I do not agree with this description which is considered an over representation of the residential component across the receiving environment. The environment includes high levels of natural character, and the applicant's site is surrounded by large lots with obvious rural characteristics.

Cumulative Effects

Within the LVA there is no consideration of the potential cumulative effects of the Proposal on the natural and rural character of the receiving environment. It is considered that cumulative effects will likely arise from the proposal given recent nearby development.

Further assessment on potential cumulative effects is recommended and this should include potential effects of future permitted development on Lot 8 (to be sold to the neighbour). At present the potential development on this lot, and therefore the effects, are not discussed at all in the LVA.

Landscape sensitivity to absorb change

The LVA states:

'Any physical modification to the landform of the ridgeline would be seen as detrimental as this would interrupt the chain/network of ridgelines and thus would be viewed as a negative change. By contrast the opportunity for positive change is present through the prospect of increasing the amount of native planting at site and decreasing the amount of geometrically arranged utility planting at the ridgelines and its replacement with organically arranged native planting'.

The LV then concludes: *'the level of sensitivity of the site to absorb landscape change being considered as Very Low-Moderate'.*

Given the visually exposed nature of the ridgeline from a wide range of viewpoint distances across the Harbour and receiving environment, the review does not agree with a *Very Low-Moderate* assessment.

A rating of *Very Low* means almost no change to the baseline. This *Very Low-Moderate* rating within the LV report is considered overly low. Rather, I believe that this area of site would likely have a sensitivity rating of *Moderate* (or possibly above).

PROPOSAL

As mentioned in the Introduction section above, the review found a high level of uncertainty around a number of different aspects of the Proposal which has led to requests for further information.

LANDSCAPE AND VISUAL EFFECTS

Effects on Landscape Character

The review considers that the proposed higher density residential subdivision on the elevated coastal headland will fundamentally change the physical character of the site, not just how it appears visually.

The Applicant refers to the development that has occurred on neighbouring properties, however a number of the adjacent properties are generally much larger than the Applicants site and have also retained larger proportions of rural landuse activities within their overall site areas. By contrast, the majority of the Applicants proposal is devoted to what is essentially residential Lots of a much higher density and this will irrevocably change the amenity, character and attributes of the site and its existing rural and natural landscape context.

Potential changes to the vegetative landcover should be further discussed in the LV report because planting (existing and new) is an important attribute to this landscape. The existing mature shelterbelts on the ridgeline have been present since the 1980s (approximately) and this vegetative landcover is an established feature of the physical landscape and its rural character. Loss of such established landscape features is a modification to the landscape and the LV would benefit from additional consideration on this matter.

Assessment of Visual Effects

The Application site is on an exposed and prominent location on a ridgeline and coastal headland on the boundary of Ōhiwa Harbour. The analysis and visual mapping section of the LVA did not include a 'zone of theoretical visibility (ZTV) map of the receiving environment. It is considered that either would have assisted in supporting the visual effects assessment given the complex topographical character of the Harbour and its coastal headlands. It is recognised that while ZTV mapping will not indicate the nature of an effect or the degree of effect, these maps are very useful to depict the potential extent of visibility of a proposal with regard to topography.

The LVA explains that the proposed planting strategy seeks to *'provide a degree of obscuration to any future built form when viewed outside the site...and so that the future built form will be absorbed within the landscape'*.

With regards to views from the east, visual simulation VP4 illustrates that the new planting within the site does very little to mitigate views, instead it seems that existing planting on adjacent sites is the key mitigation. To this point, the Applicant responds:

"The planting layout is proposed with a long term view and has been arranged in such a manner that any anticipated built form is absorbed into the landscape regardless of what happens to off site vegetation (i.e: if it is removed by the relevant authority or individual lot owners) and the assessment has been undertaken on this basis and thus is not reliant on any perceived mitigation from planting located outside of the subject lots". However the applicant cannot rely on vegetation that is outside their site as a mitigation measure, because they have no control over such vegetation. It could be removed at any time. Further to this, the current visual simulations do not demonstrate that planting on their own site is the main mitigation.

An additional consideration with the eastern aspect of the proposal is that Lots 1,2,3,4,5, 7 and Lot 8 will enjoy clear views to the east, and therefore the dwellings will also be very visible from this direction (e.g. from public areas). As mentioned above, existing vegetation on adjacent properties

seems to screen the majority of the dwellings from the VP4 location. At the same time this viewing location is a much lower elevation and as a consequence the hill slope helps to hide the applicants site. Therefore the VP4 location on Ōhiwa Harbour Road does not seem to be a particularly sensitive visual receiver. It is recommended that that visual simulations from key nominated viewpoints are agreed with by the Council which may further assist the LV assessment.

It is important to add that visual simulations are a key design tool to be used within an iterative process in studying the landscape and visual issues of a proposal in a number of different ways such as helping identify sensitive receivers. Following this approach is especially useful in assessing this proposed residential subdivision development because of the complicated nature of the terrain (i.e. topographical character of the site and surrounding headland), and the interplay between the Applicants proposed treatments to existing vegetation (i.e. retention and removal of established shelterbelts) and new planting to be installed, but also because the simulations are a tool to help evaluate the built form (and its possible effects) within its landscape context and next to the ridgeline. In other words, developing visual simulations is considered an iterative process which should be relied on to assess, and then re-assess, the usefulness of any of the VP locations but also of any detail of the proposal being illustrated.

On the visual simulations provided (VP4, VP6 and VP6), dashed lines seem to represent several of the proposed houses which are 'behind' the planting which suggests the buildings are fully screened from this perspective. This is not considered to be a realistic portrayal of what is likely to occur on site, in other words if the buildings are not visible then there is little benefit showing these dashed lines (i.e. other than being used as a visual reference on draft versions).

A potential visual effect of the proposal relates to Lots 10, 11 and 12, located close to the crest of the ridgeline combined with the removal of a significant section of existing large *Cryptomeria* shelterbelt. This planting is along the western edge of the ridge which currently screens the western aspect (i.e. views into the site). Its proposed removal is to ensure that any occupants of these three dwellings can enjoy clear outward views to the west. This is an important matter within the visual assessment as the proposed replacement planting of fragments of native trees and shrubs in isolated clusters does not seem to substantially screen views to these dwellings from the west and north as illustrated in VP6 and VP10. The LVA suggests that visual effects from this direction will be Very Low, and that the proposed native planting will positively '*increase the 'naturalness' of the existing ridgeline' and that '...a minimal amount, if any, of the future residential built form will be viewed against this sky backdrop'*. The reviewer considers these explanations exaggerate the visual and screening benefit of the small amounts of native planting, and also understate how much of the dwellings will be visible on the ridgeline from the west and north. As mentioned earlier in this review, built forms are especially noticeable on ridgelines. It is recommended that this issue is addressed in more detail and include accurate visual simulations of a realistic and likely / worst case scenario building design, including external finishes and colours and window glare and also using realistic building area footprints.

Due to the anticipated sensitivity of views from the west and north, the review requested the Applicant provide an additional simulation from Ōhiwa Spit (at the western end of Ōhiwa Harbour Road). This is considered a suitable location for an alternative view because it will capture a wide range of assessment related considerations:

- View from the northerly quarter with a clear view of the ridgeline.
- View from a public area.

- View from within the adjacent area of the ONFL and area of Outstanding Natural Character (RPS).
- View from within the Indigenous Biological Diversity Area (Coastal Environmental Plan).

Ōpōtiki District Plan

In response to Objective 9.2.1.2 the LV report does not address the reality that a number of new dwellings will be introduced onto the ridgeline which are only partially screened, because of existing shelter felled and only small amounts of new planting introduced.

In response to Objective 9.2.1.3 the LV report does reflect that the existing 'naturalness' of the site is being changed, probably adversely, due to new buildings. Planting around the buildings is essentially amenity planting in an arrangement that suits the parcels of land (Lots) and typical of a residential garden rather than achieving an overly 'natural' result. Views to the buildings are visible. Further clarity on visual simulations has been requested to help determine to what extent or degree these dwellings are visible.

In response to Objective 9.2.2 (Inappropriate Subdivision) it is difficult to see how higher density residential development is appropriate on a ridgeline compared to lower, less exposed, or less visible areas within the Coastal Zone, or areas close to existing housing clusters.

PUBLIC SUBMISSIONS

All of the public submissions that were reviewed oppose the proposal. A consistent theme within these submissions was centred around the higher density of Lots on the headland and worry that it will set a precedent for similar development in this area in the future and result in cumulative effects. These concerns within the submissions around cumulative effects are legitimate in terms of potential landscape and visual changes to the landscape based on my own findings and observations of the area.

CONCLUSIONS

This review has identified that the LV report is insufficient and does not prove that landscape and visual effects are acceptable. In particular, there is a high level of uncertainty within the proposal and LV report in regard to:

- architectural detail including materials, roof pitches, eaves, external finishes, windows;
- mitigation measures (including new planting, treatments to existing vegetation, the timing of planting);
- achieving an appropriate level of realistic accuracy in the portrayal of the proposal in the visual simulations.

Importantly, the current visual representations do not represent a realistic development scenario. This level of uncertainty is not considered appropriate given the receiving environment is one which consists of an area of Outstanding Natural Character (refer image in Appendix), and also in recognising the Applicants site in located on a crest of a ridgeline on a visually prominent coastal headland. The proposal seeks to provide a density of housing that is more than double what would be permitted in the zone. This will appear incongruent compared with the pattern of existing built

development which contributes to the existing landscape character within the receiving environment.

The conclusion within the LVA does not use the widely accepted 7-point scale of effects. A conclusion of effects using this scale is recommended.

The visual effects section within the LVA mentions 'Very Low' to 'Moderate' effects, which suggests a wide range of potential effects. On this point it is considered that the widely accepted seven-point scale of effects should be applied in clearer terms.

APPENDIX

Image below: overlay of Outstanding Natural Character area (Regional Policy Statement)

