
TO: Bede Morrissey, Policy Planner, City Development

FROM: Luke McKinlay, Landscape Architect

DATE: 05 September 2022

SUBJECT: **VARIATION 2: RESPONSE TO FURTHER EVIDENCE/RESPONSES TO 42A REPORT FROM SUBMITTERS - LANDSCAPE.**

BACKGROUND

The following brief assessments are in response to further information received from submitters. They identify whether this new information has resulted in a change to my initial comments. As with the initial assessments, they are focused on the effect of rezoning on rural character and visual amenity (Policy 2.6.2.1.d.i and Objective 2.4.6).

Policy 2.6.2.1.d is:

Identify areas for new residential zoning based on the following criteria: ...

d. considering the zoning, rules, and potential level of development provided for, the zoning is the most appropriate in terms of the objectives of the Plan, in particular:

i. the character and visual amenity of Dunedin's rural environment is maintained or enhanced (Objective 2.4.6);

Objective 2.4.6 is:

The character and visual amenity of Dunedin's rural environment is maintained or enhanced.

It is accepted that rezoning land to residential will always result a loss of rural character and amenity. This may include effects on important vistas or viewshafts, and important green or open spaces. As such these assessments will identify areas where rural character and amenity values are sufficiently high such that their loss is a relevant consideration in the decision to rezone a site. To support this assessment, reference is made to the identified rural character values of the relevant rural zones within Dunedin City (Appendix 7 of the 2GP) and identified values of landscape overlay areas (Appendix 3 of the 2GP), where applicable. Comments are also provided on potential mitigation measures for loss of rural character and amenity.

Methodology

These brief assessments are guided by the concepts and principles outlined in Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, 2021. Assessments typically involve a desk-top review of the site and surrounding area, site visits, review of the relevant statutory documents, and an assessment of visual amenity and rural character effects.

Effects Rating Terminology

When describing effects, the following seven-point scale is used, in accordance with the recommendations of Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. The bottom row of the table shows how the adjectives in the seven-point scale are related to RMA terminology.

Very low	Low	Low-moderate	Moderate	Moderate-high	High	Very High
Less than minor	Minor		More than minor		Significant	

COMMENTS ON FURTHER EVIDENCE RECEIVED

RS193: 177 Tomahawk Road – Rezoning from Rural to General Residential 1

1. The submitters have responded to the 42a recommendation with a structure plan and associated planning analysis. The submitter proposes that 4.32ha of the site (just over half of the total property area) is rezoned to the GR1 zone. The remainder of the site (3.35ha) will be rezoned to recreation. This proposed recreation zone area will largely comprise the flat part of the site adjacent to the lagoon.
2. The planning analysis identifies that the residential zoning will most likely result in a yield of 35 GR1 sites (at 800m²). A maximum of 68 would be theoretically possible at 400m². Of the 35 lots 8 would be accessible from Gloucester Street. The balance would be accessible from a new legal road connecting to Tomahawk Road.
3. As outlined in my initial comments, the site borders the western side of the western Tomahawk Lagoon (the lagoon comprises two shallow brackish lobes joined by a narrow channel). This regionally significant lagoon forms an important part of the landscape context of this site. The western lobe of the lagoon is largely encircled by rural land, with a small part of the southern boundary bordering Tomahawk Road and residential properties. This surrounding rural land, including the subject site, contribute to the natural character setting of the lagoon. The subject site displays rural character attributes including a predominance of natural features over human made features, a high ratio of open space relative to the buildings, areas of pasture and some remnant indigenous vegetation, including ngaio and totara trees.
4. It was my initial recommendation that a limited extent of residential development could be accommodated within a much smaller area adjacent to existing residential development near Gloucester Street without adversely affecting existing landscape character values associated with the rural lagoon surrounds to a high degree.
5. It is considered that the proposal to rezone the land immediately adjacent to the lagoon recreation could avoid the most severe adverse effects on the natural character of the lagoon and its immediate surrounds. It is also supported that existing native trees on the site are retained.
6. It is considered that the extent of residential development proposed (areas A and B of the structure plan combined) will have some, at least moderate, adverse effects on the rural character of the hillslopes that surround the lagoon. As proposed, residential development would extend down to the southernmost corner of the neighbouring rural property (54 Gloucester St) to approximately the 28m contour. Currently, rural zoned land on these hillslopes

typically extends up to at least 50m contour. As such, residential development would extend across most of the hillslopes within the site and form a distinct residential boundary with the neighbouring rural land to the north.

7. In general, it is considered that the smaller area shown as Area A (to comprise 8 lots) would have relatively low effects on both rural character and visual amenity values as it would be seen as a relatively small extension of the neighbouring residential area.

RS204: 21, 43, 55, 65, 75, 79, and 111 Chain Hills Road – Rezoning from Rural Residential 1 to a mix of zones (GR1, LLR1) as shown on submitter’s structure plan

8. These sites are located on Chain Hills Road to the east of Mosgiel. The original reason for rejecting the rezoning in the section 32 report was that the site is somewhat isolated and fails to support the compact form/city policies.
9. The submitter (S219) has provided a draft structure plan which seeks to provide for a total of 136 lots across both RS204 and RS153.
10. Following the release of the 42a report, a Visual and Landscape Assessment (VLA) of the rezoning proposal has been prepared by Mike Moore. The following additional comments are largely in response to this assessment.
11. In general, there is broad agreement between Mr Moore and I regarding the effects of the proposed rezoning. In his conclusion, Mr Moore finds that the landscape and visual effects of the rezoning will be generally adverse, with the magnitude ranging from low – high. He recommends that zoning to provide for residential development as proposed, is appropriate in four areas of the proposed structure plan, these being Areas A, B, M and N.
12. In general, I agree with this assessment and consider that the proposed areas of development across the mid and upper slopes would erode the existing rural character, which provides a largely unbuilt backdrop to urban parts of Mosgiel. As identified by Mr Moore, “the spread of residential land use into the mid-slope spur areas will be a significant departure for the Chain Hills landscape. The existing sense of the urban area of Mosgiel being enclosed within a rural context will be substantially weakened”. I agree with this assessment.
13. It is agreed that if area M will only result in one additional dwelling (due to geotechnical constraints in this area) and given the context of adjacent consented low density residential development, effects of this additional dwelling on visual and landscape amenity values will be relatively low.
14. With regards to the proposed extent of Area B, we have a minor difference of professional opinion. The VLA prepared by Mr Moore concludes that the extension of the current urban edge of Mosgiel up the lower slope areas of Chain Hills (proposed areas A, B and N) will generally integrate with existing landscape character and quality well given the nearby context of residential development on the north-westerly facing foothills.
15. I generally concur with this finding but remain of the opinion that the extent of the extension of residential land use up the slopes should be carefully considered. As proposed, the structure plan includes proposed low density rezoned land (Area B) that extends from the lower slopes to the boundary with existing rural residential zoned land (approximately the 125m contour). Currently, low density residential land immediately to the west of Area B and the long strip of

low-density zoned land along the north-western side of Chain Hills generally extends to no more than the 90m contour up these slopes. The only outlier to this pattern is Areas C & D of the structure plan area, which is consented, and extends to approximately the 146m contour.

16. Area B follows the crest of a ridge and as proposed in the structure plan, residential development atop this ridge has a long lineal form, which largely consists of a single row of dwellings. Once built upon and these residential properties are likely fenced, it is considered the lineal form of this ridgetop development will potentially form quite a prominent strip of residential development where it extends into the mid-upper slopes.
17. It remains my opinion that to avoid further cumulative erosion of the rural character of the mid-upper slopes (accepting that areas C & D already intrude into a part of these slopes), it is considered preferable that Area B is limited to the low-mid slopes (approximately the 90m contour). This will preserve a more distinct green break above existing and proposed residential development near this north-western side of the site.

RS161: 210 Signal Hill Road – Rezoning from Rural to Large Lot Residential or Rural Residential

18. Having reviewed the 42a report, the submitter has re-assessed the suitability of all 7 building platforms originally proposed for this site. Based on this reassessment, they are proposing to reduce the number of building platforms to 3. The 3 proposed platforms are those numbered 1, 2 and 5 on the original site plan. Platforms 1 and 2 are the two most northerly sites on the property, while Platform 5 is the southernmost platform.
19. It is agreed that the proposed reduced number of building platforms will have lower effects on existing landscape and visual amenity values than the originally proposed scheme. If all the proposed design controls are implemented, proposed works to enhance and protect existing biodiversity values are enacted, and existing farm structures removed (pigsty and yards) it is considered that potential adverse effects on existing landscape character values of this SNL could be reduced to moderate/low levels.
20. The implementation of all proposed development controls would be required to ensure the relative dominance of natural landscape elements over built elements is maintained within this SNL. It is noted that the 2GP requires that the maximum height of dwellings in landscape and coastal character overlay zones is 5m. This standard would apply to residential dwellings on this site rather than the proposed 5.5m.
21. In addition to the proposed design controls, it is recommended that a condition requiring the retention of existing boundary planting surrounding site 2 in perpetuity is also included as this vegetation plays an important role in visual mitigation. Additional site-specific planting mitigation proposals would also likely be required for proposed platforms 1 & 5. The initial VLA assessment appeared to be based on a maximum building footprint of 250m². While not explicitly listed as one of the performance standards the assessment, it was noted in the VLA that “The house sites indicated are 10m x 25m and reflect a slightly smaller footprint than the present residence. A long and thin profile is appropriate to the topography and has a high potential for successful integration into the site, subject to conditions”. It is agreed that controls on overall building footprint would be appropriate in this SNL overlay area.
22. In general, it is considered that the proposal is now more akin to a rural residential development than a large lot development, which would visually integrate more successfully in the context of the surrounding SNL, which includes some rural residential development. It is noted,

however, the development remains reliant on a suite of performance standards and proposed enhancements to existing native forest areas to avoid adverse effects on landscape and visual amenity values.

23. While the effects of this rezoning proposal on landscape character appear to be manageable with the implementation of design controls, it is noted that rezoning in the SNL overlay area zoning is inconsistent with Policy 2.6.2.1.d.iv, which requires that Dunedin's outstanding and significant natural landscapes and natural features are protected (Objective 2.4.4). As this policy states, "achieving this includes generally avoiding the application of new residential zoning in ONF, ONL and SNL overlay zones".

RS110: 23 Sretlaw Place / 118 Brockville Road – Rezoning from Rural to General Residential 1

24. Comments on this site remain largely unchanged. Some recommended amendments have been made to the proposed design, including the requirement for rural type fencing along the western boundary of the site and additional planting areas, which will help to avoid an abrupt residential edge adjoining the neighbouring reserves, if rezoning were to proceed. However, as outlined in my initial comments, effects on the visual amenity of neighbouring residents and the natural character of the gully as experienced by users of the reserve track that traverses the hillslopes to the west of the site will still be adversely affected by this proposal.
25. As identified in my initial comments, the site is overlooked by some neighbouring properties on Sretlaw Street and there will likely be adverse visual amenity effects on these residents associated with a loss of this open green space adjacent to the Frasers Gully reserve if residential rezoning proceeds. I also noted, however, that for other nearby residents, views over the subject site to the northern side of Frasers Gully, which comprises the most prominent natural area to the north, will not be intruded upon by residential development on this site due to its sloping topography which falls towards the Kaikorai Stream.
26. My initial comments identified that the effects on rural character would be low-moderate, given that this is a small remnant rural block adjacent to a residential area. These comments referred to the fact that this block is not highly consistent with rural character values of the hill slopes rural zone. It is not part of the wider contiguous area of rural hill country that backdrops or provides enclosure to a nearby urban area. Rather, it is relatively small, remnant pocket of rural land. The site does, however, contribute to the amenity of the surrounding Fraser Gully area which has relatively high natural character values associated with the nearby reserves, including established areas of native bush and recently planted areas of native revegetation.

RS176: 234/290 Malvern Street, Leith Valley – Rezoning from Rural Residential 2 to either Large Lot Residential (LLR1 or LLR2) or Rural Residential 1

27. The following responds to the proposed structure plan and associated landscape and visual assessment, provided by the submitter.
28. As outlined in the landscape and visual assessment that supports this rezoning/structure plan, the proposed plan change will now give rise to the subdivision of this 15.8 ha property into three smaller lots. Only two additional dwellings (with associated accessory buildings, access ways and plantings) are now proposed. As part of the plan change, it is proposed that the framework of native vegetation on the property is extended, along with management of the regenerating forest to enhance its ecological value.

29. The supporting landscape and visual assessment finds that the effects of the plan change on landscape values will be adverse / very low in the short term and positive in the long term. The adverse effects will arise from the introduction of more built form in an area where this is presently little, but these effects are assessed as being low due to the proposed design controls to minimize prominence and due to the built density expectations associated with the current RR2 zone.
30. In general, I concur with these findings. It is considered that the proposed structure plan will result in a built density that will generally retain the rural residential character of the surrounding area. There will also be positive effects associated with the proposed additional planting, and the proposed management of the existing native bush.
31. It is noted that the proposal does rely on a range of development controls, including proposed height limits for new buildings, visually recessive cladding materials and colours, restricting new accessways to rural-type gravel roads, undergrounding services, fencing to be rural-type post and wire construction only etc. It is considered that these controls would play an important role in ensuring that effects of the proposed additional residential development, albeit at a density more akin to rural residential zoning, would visually integrate successfully in this rural-residential setting.

RS206, RS206a, RS77: Part 35 and 43 Watts Road, Part 109 North Road – Rezoning from Rural/Rural Residential 2 to General Residential 2/General Residential 1

43 Watts Road - Proposed Large Lot Residential 1 – Area D (RS206).

32. As identified at the initial assessment stage, a large part of 43 Watts Road (Area D of the proposed structure plan) is within a Significant Natural Landscape. In general, it is considered inappropriate for residential development within this overlay area due to the associated landscape values and their protection under the 2GP policy framework.
33. The SNL part of 43 Watts Road borders the lower boundary of the SNL in this area. This boundary generally follows the 100m contour to the west and east of the site. As such, the site forms part of a consistent natural landscape at this elevation on the north-western side of the valley. The part of the site overlaid by the SNL is in keeping with several of the sensory values identifies as being important to protect within the wider Flagstaff-Mt Cargill SNL. These include the following:
- Low impact of built elements and associated relative dominance of natural landscape elements.
 - Naturalness of elevated landforms.
 - Contribution to the extent and quality of views across the landscape from public roads.
 - Naturalness of the foreground views towards the Mt Cargill ONL, and
 - Its contribution to forming a natural backdrop to nearby urban areas.
34. It is acknowledged that the vegetation composition of the SNL overlay area within the site is mixed and includes exotic trees and some areas of gorse, however, it is noted that the landcover of the wider surrounding SNL is also mixed and includes pastoral areas as well as small woodlots, areas of remnant native vegetation and patches of gorse (refer Appendix 2, page 10 of Mr Milne's evidence). In general, it is considered that the SNL overlay area across the site is

appropriate and integrates well with the neighbouring hillslopes. It is also noted that the submitter has not challenged the location of the SNL boundary.

35. The SNL that overlays the site was assessed by Landscape Architect, Mike Moore in 2017 to inform the 2GP urban land supply hearing. Mr Moore made the following comments regarding the surrounding context and site:
36. "The wider landscape context of the site is the north-western slopes of North East Valley. These have a predominantly unbuilt, rural character that contributes to the amenity of the valley landscape generally and that separates the suburban area of North East Valley from that of Liberton and Pine Hill. The character of the site blends fairly seamlessly with the rural land above and the wooded areas below and contributes to the rural landscape setting of the valley".
37. Mr Moore reached the conclusion that, in adopting the 100m contour, the SNL boundary has been mapped at a fairly broad scale, but it was generally appropriate. He concluded that if the boundary of the SNL were to be drawn at a finer scale across the subject site, then the line would be more appropriately adjusted downward rather than upward in this area to include the steep, treed slopes on the quarry face and slopes adjacent.
38. As identified in Mr Milne's evidence, the Boffa Miskell 2GP Overlay Review of 2021 reached the following conclusion regarding the SNL that overlays the site:
39. "Given the sites elevation and extensive areas of vegetation, which contribute to containing development along the valley floor in this area, there is potential that any more extensive residential land use would result in a more prominent and fragmented urban edge contrary to the softened rural edge recognised by this SNL classification". On this basis they recommended the maintenance of the SNL overlay and rural zone.
40. In general, these assessments concur with my conclusion that the current SNL overlay is appropriate. It is considered that a node of Large Lot Residential 2 zoning, as proposed for Area D (RS206), is incompatible with this overlay area and would contrast with the largely natural character of this uppermost part of the site and nearby hillslopes, which is overlooked from residential areas on the southeast side of the valley.
41. Rezoning this area to residential zoning is also inconsistent with Policy 2.6.2.1.d.iv which requires that Dunedin's outstanding and significant natural landscapes and natural features are protected (Objective 2.4.4). As this policy states, "achieving this includes generally avoiding the application of new residential zoning in ONF, ONL and SNL overlay zones".

Rezoning rural-zoned parts of the site to General Residential - Area C (RS206a) and Area E (RS077)

42. These areas surround the rehabilitated quarry. They include the steep faces of the former quarry, the top edges of the quarry and hillslopes to the west. In general, these areas are characterised by dense tree cover, consisting of a mix of exotic trees and native understorey species. These parts of the site are seen in the context of the surrounding rural hill slopes on the north-western side of Northeast Valley. Areas C and E currently form a largely natural counterpoint to nearby residential areas.
43. It is acknowledged, that Area C neighbours a recently consented residential subdivision to the north (Area A) and borders General Residential 1 zoned land to the east, which currently

contains a collection of industrial buildings. This area is somewhat lower than Area D and the top parts of Areas B and E. Given the lower elevation of this part of the site and the presence of adjoining areas of residential development on Watts Road, it is considered that the visual sensitivity of this part of the site to a change of land use is lower than Areas B, D or E. Of the rural zoned parts of the site, it is considered that residential rezoning of this area would have less effects on visual amenity and rural character values than higher parts of the site, more remote from residential development. It is agreed with Mr Milne, however, that if residential development were to occur in this area, established trees should be retained where possible. It is also likely that a framework of mitigation planting would be required to ensure any residential development in this area visually integrates with the neighbouring treed slopes (Areas B, D and E).

44. As noted in my initial comments, the topography within parts of RS077 is steep and Area E has a predominantly south/south-westerly aspect. I noted that neither of these factors lend themselves to residential development. This remains my opinion.
45. Mr Milne provides analysis of Area E in Appendix 2 of his evidence. He refers to the Auckland Design Manual recommendation that “at least 70% of living rooms and private outdoor spaces in a development should receive a minimum of three hours direct sunlight between 9am and 3pm in mid-winter”. Similar advice is also provided in the Kainga Ora document – Homes and Communities M-134: Design Performance Requirements (v1 Draft) April 2021.
46. Shading diagrams supplied with the submission show that the much of Area E will receive little to no sun during the day between 21 May and 21 July (Appendix 2 of the VLA, page 21). This seems to confirm that the site would be unable to meet the recommended minimum level of sunlight during mid-winter as outlined in the above two documents. Further, the deep cuts shown in the indicative section for Area E (Appendix 2, page 50), illustrate that the lower two levels of the proposed three storey apartment buildings would predominantly be cut into the hill side, eliminating the chance of any natural light from the north for most of these proposed apartments. The analysis reaches that conclusion that there would be “extensive shading issues due to south-west orientation”. I concur with this assessment.
47. In general, it is considered that the proposed residential rezoning of area E would lead to an erosion of the existing natural and rural character values of these treed slopes, which form a highly prominent green area that frames this lower boundary of the rural zone. Multiple blocks of multi-storey apartment buildings (15 blocks are shown in the structure plan) would contrast strongly with the unbuilt character of these slopes.

RS200: 489 East Taieri-Allanton Road – Rezoning from Rural to Township and Settlement/Large Lot Residential 1

48. Initial comments remain largely unchanged for this submission. This site occupies gently to moderately sloping pastoral land to the east of Allanton. The slopes above the site are contained within the Saddle Hill SNL. The area proposed for residential development does not have any additional landscape overlays.
49. These slopes have a predominant pastoral landcover. Two small clusters of tall Eucalyptus trees are prominent features in this pastoral context. A small existing dwelling is located at 643 East Taieri-Allanton Road, approximately mid-way along the road front of the proposed rezoned area. The site is prominent on the left-hand side of SH1 to motorists as they approach from the east.

50. This site displays characteristics that are consistent with identified values of the coastal rural zone as outlined in Appendix 7 of the 2GP. The predominant pastoral landcover means that there is a general visual dominance of natural elements over built elements and there is limited visual influence of any large-scale structures to diminish the impact of the natural landscape forms and features. The site is part of a wider rural landscape to the west of Allanton, characterised on the southern side of SH1 by pastoral land-use on the more gently sloping paddocks near the state highway boundary and remnant native vegetation and exotic weed species (predominantly gorse) within gullies on higher slopes. A consistent patchwork of pastoral land with shelter belts defining some paddock and property boundaries characterises the rural land on the northern side of SH1, opposite the site.
51. The existing eastern edge of Allanton is currently well defined, with the Town and Settlement zone terminating on both sides of SH1 at the start of a gentle curve in the road as approached from the east. Well established boundary vegetation and shelterbelts further reinforce the edge of this small township.
52. Whilst the site is highly prominent from SH1 it is acknowledged that the visual effects of the proposed rezoning would largely be restricted to passing motorists on SH1, given that the site is well screened from nearby residential parts of Allanton by existing mature trees. In time, proposed parkland and boundary planting would filter, if not entirely screen views of residential development on these slopes. On balance, it is considered effects on existing rural character values will be moderate, but largely restricted to the immediate surrounding area, predominantly viewed by approaching motorists on SH1.
53. It is also acknowledged that there would be likely ecological benefits associated with the proposed conservation and enhancement works on the slopes above the proposed residential area and this would also enhance the natural character of these slopes within the SNL.

RS14: Freeman Cl and Lambert St, Abbotsford – Rezoning from Rural to General Residential 1

45 McMeakin Road and part of 188 North Taieri Road

54. With regards to S228.003, it is noted that the submitter is now proposing a range of development controls attached to the structure plan for 45 McMeakin Road and part of 188 North Taieri Road. These controls include restrictions on building height, gross floor area and cladding colours.
55. In general, my initial assessment remains largely unchanged. It is considered that the design controls proposed would not be sufficient to mitigate the adverse effects on rural character of such a large conversion of rural hill slopes to residential use. These hillslopes display characteristics that are consistent with the rural hill slopes zone. They are part of a wider contiguous area of rural zoned land which backdrops nearby residential parts of the Abbotsford Valley. They provide a predominantly unbuilt natural backdrop to nearby urban areas.

55 Meakin Road

56. In response to the 42a report, the submitter appears to be proposing either a broader rezoning proposal and/or a smaller scale proposal. Under the smaller scale proposal, only a small portion

of the property, measuring 0.75ha in area, would be rezoned to the GR1 zone (the remainder of the property under this rezoning option will remain in the Hill Slopes Rural zone).

57. With regards to the broader rezoning proposal, my initial comments remain unchanged. Conversion of such a large area of distinctly rural land, which is part of a largely contiguous area of rural or rural residential land, will have high adverse effects on existing rural character values. There will also be adverse visual amenity effects on nearby rural residential and residential properties associated with the loss of the open spatial characteristics and natural character of this area, which would result from widespread general residential development across these hillslopes.
58. With regards to the smaller 0.75ha site, adverse effects on wider rural character values would be noticeably lower (in the range moderate to low) for this relatively small, low-lying block of land when compared with the broader rezoning proposal given the much-reduced scale of the proposal. The visual amenity of the immediate surrounding area would be adversely affected by rezoning this pastoral site, which, although small, currently displays a predominance of natural features over human made features.
59. If rezoning were to occur here protection and enhancement of the Abbotsford Stream that runs along the northern boundary of the site is recommended.

25 McMeakin Road

60. Initial comments regarding 25 McMeakin Road remain unchanged. Adverse effects on visual amenity and rural character values are likely to be notably lower for 25 McMeakin Road (S298.001) than the widescale rezoning of the more prominent hill slopes (such as the 15 ha area that is the subject of submission 302.002). 25 McMeakin Road is a relatively small block of flat rural pastoral land immediately to the northeast of existing residential development. Residential development here would conform to the existing pattern of nearby urban residential development, which is restricted to the flatter parts of the valley floor. It is not a highly prominent location as viewed from most nearby residential areas, including rural residential properties to the east. From the nearest rural residential properties to the east, it appears that primary views to the west, where not screened by intervening trees, would be over the top of this site. Nevertheless, there would likely be adverse visual amenity effects on some neighbouring properties and from adjacent public locations on McMeakin Road.
61. If rezoning were to occur here protection and enhancement of the Abbotsford Stream that runs along the northern boundary of the site is recommended.

42a Lambert Street

62. Initial comments regarding 42 Lambert Street remain unchanged. Existing rural character values associated with 42 Lambert Street (S281.001) are not as high as parts of the broader site within RS14, which are part of a large contiguous area of the surrounding rural hillslopes. This site occupies largely flat to gently sloping land between existing residential development within Abbotsford Valley and the Main South Railway Line. Existing landcover appears to comprise rough pasture, scattered exotic shade trees and some patches of gorse.
63. As a relatively long, irregular block of land, residential development on this site would be largely surrounded by other rural properties, so will not be particularly well integrated with the nearby residential area. However, effects on wider surrounding rural character would be low-moderate, due to the relatively low visual quality of the site, which does not appear to be used

for primary production, the close proximity of the site to the railway corridor, sand mine and nearby residential development. As identified in my initial comments, there will likely be some adverse visual amenity effects on a small number of nearby residents on Hyslop and Lambert Streets associated with residential development replacing the current open spatial character of this rural block of land, albeit of moderate visual quality.

64. The Submitter's planning analysis suggests that adverse visual effects on nearby residents may be able to be successfully mitigated through boundary planting requirements, however, no details of any proposed mitigation are provided in the submission.

RS154: 91 and 103 Formby Street & RS175: 85 Formby Street – Rezoning from Rural to Township and Settlement

65. As identified in my initial comments, whilst located at the edge of Outram, it is considered that the subject sites display attributes that are consistent with rural character values of the surrounding plains landscape. These sites are part of a broader patchwork of flat, pastoral land west of Outram. As described in Appendix 7.3 of the 2GP (Rural Character), this landscape conforms to the grid-like pastoral layout, where fence lines, shelterbelts and consequent land use activity have a distinguishing rectangular regularity.
66. Further, as outlined in Objective 16.2.3, elements of rural characters and amenity of the rural zone include the following, which are consistent with the subject site:
- a. a predominance of natural features over human made features,*
 - b. a high ratio of open space, low levels of artificial light, and a low density of buildings and structures;*
 - c. buildings that are rural in nature, scale and design, such as barns and sheds;*
 - d. a low density of residential activity, which is associated with rural activities;*
 - e. a high proportion of land containing farmed animals, pasture, crops, and forestry; predominance of natural elements, high ratio of open space, low levels of built form and artificial light and rural land uses.*
67. It is agreed with Mr Moore that there are no landscape features or characteristics of recognised landscape significance associated with these sites and this is reflected by the fact that there are no 2GP landscape overlays relevant to this site. There is, however, an ox-bow stream meander that borders the site to the north. It is considered that if rezoning were to proceed, protection and enhancement of the riparian edge of this stream should occur to maintain the natural character values of this waterway.
68. In general, it is considered that rural amenity values as perceived from locations surrounding the site will be adversely impacted by the loss of open space and rural character on the site. Mr Moore considers that moderate adverse effects will be limited to the immediate surrounding area and are an unavoidable consequence of urban growth. I generally agree with this assessment.
69. There will also be adverse visual amenity effects from neighbouring residential properties associated with the loss of the rural pastoral outlook, which would be replaced with residential development across these distinctly rural paddocks.

70. If rezoning were to occur, it is agreed that the proposed lower density plan proposed would integrate more successfully with the existing grain of development in Outram. At the subdivision design stage, it is agreed that the inclusion of reserve and street plantings would help to ensure that a higher level of urban amenity is achieved.

RS151 Part 147 St Leonards Drive

71. As identified in the initial assessment of the Section 42a report, this site is remote from nearby residential areas, bordering both rural residential and rural zoned land. There is generally a good level of consistency to the pattern of Township and Settlement zoned residential development being contained to harbour edge locations in the surrounding area (St Leonards, Maia, Roseneath), with more spacious rural residential development occupying the lower slopes above these areas.
72. The subject site occupies a mid-slope location on the northern side of the inner harbour, between St Leonards and Roseneath. The entire site is included in the Flagstaff-Mt Cargill SNL. The mid and upper slopes of these hillslopes within the SNL, which include and surround the site, display characteristics that are consistent with identified sensory values for this overlay zone. Land cover is mixed but includes pastoral areas and established shelterbelts (evident on the subject site), small woodlots and areas of remnant native vegetation. In general, it is considered that the site forms part of a wider surrounding area with natural/unbuilt attributes of a rural landscape. It provides the backdrop and containment to the nearby discrete harbourside settlements.
73. The proposed large lot development would be a notable departure from this pattern of development and would detract from the consistently rural characteristics of the surrounding hillslopes, which form part of the Flagstaff-Mt Cargill SNL. It is considered that rezoning would have an at least moderate effect on the rural character of these hillslopes.
74. It is acknowledged that there would likely be biodiversity benefits associated with the proposed ecological enhancement works.

RS195 774 Allanton-Waihola Road

75. As identified in the VLA that supports this submission, this large (55ha) rectangular block of farmland lies between the Allanton-Waihola Road (SH1) and the Taieri River. It is located to the southwest of Allanton, on the opposite side of Centre Road.
76. The Brighton coastal hills form a backdrop to the site, southeast of SH1. The Maungatua Range forms a more distant backdrop to the northwest. The Taieri River curls along the north-western boundary of the site. The main south railway line follows the northern boundary of the parts of the site proposed to be rezoned.
77. The predominant pastoral and cropping landcover and lines of mature conifer shelterbelts within the site ensure that there is a general visual dominance of natural landscape elements. There is limited visual influence of any large-scale structures to diminish the impact of the natural landscape forms and features. The site is part of a wider rural landscape to the southwest of Allanton, characterised by a broadly consistent patchwork of rolling to flat pastoral land defined in places by shelter belts on paddock and property boundaries. The path of the Taieri River cuts through this rural landscape as it meanders on the southern side of the plains,

near the foot of the coastal hills. The small settlement of Momona and Dunedin Airport are located approximately 5.5km west of the site.

78. In general, it is considered that the subject sites display attributes that are consistent with rural character values of the surrounding plains landscape. These sites are part of a broader patchwork of flat to gently undulating, pastoral land west of Allanton. As described in Appendix 7.3 of the 2GP (Rural Character), this landscape conforms to the grid-like pastoral layout, where fence lines, shelterbelts and consequent land use activity have a distinguishing rectangular regularity. There are no other landscape overlays applicable to the site.
79. The proposed development seeks to rezone this rural site to accommodate between 92 (750m²) – 154 (400m²) dwellings, zoned Township and Settlement and approximately 41 dwellings, zoned Large Lot Residential 1. In general, large lot development is proposed on the higher land atop three low ridges. Extensive planting is proposed in wetland and riparian areas and boundary planting is proposed along the entire SH1 boundary and parts of the western, eastern and northern boundaries.
80. Other features of the proposed development include:
 - a. A small retail centre
 - b. Home office workshop units
 - c. Recreational walking and cycling paths
 - d. A siding area for a potential future passenger rail stop
81. It is proposed that the development would proceed in two stages, based on two “catchments” either side of a central ridge.
82. The VLA, which supports this submission, finds that effects in the medium term, will lead to a “positive change of character”. This opinion is based on “the extent of planting, wetland and riparian protection and enhancement that is provided within the proposal”. The assessment goes on to describe the expected change in character as “a general change from mostly open rural pastoral landscape to a rural/residential character of development within an extensive framework of vegetation that will continue to develop and further define the eventual character of this landscape”.
83. The VLA finds that potential adverse landscape effects would be “moderate-high” in the short term and “moderate-low” in the medium to long term. The short-term effects are identified as relating to the change in land use that would occur initially, while the long-term effects consider “the new landscape pattern and character that could reasonably be expected to emerge”. Short-term effects are identified as referring to 0 – 10 years and medium-to-long term refers to 10+ years.
84. In general, it is considered that the proposed rezoning would adversely affect existing rural character values to at least a moderate extent. The proposal represents a large-scale transition away from the currently open spatial qualities of the site, which displays the natural/unbuilt attributes of a distinctly rural landscape, to a more enclosed residential development.
85. Whilst the visual change in character would be pronounced, it is acknowledged that the perception of this change would be largely restricted to the immediate surrounding area, including the approaches to the site on SH1.

86. It is noted that the proposal is heavily reliant on mitigation planting. Whilst the extensive planting proposed would add to the visual amenity of this potential residential area, it has been estimated that it would take 10+ years for it to provide effective mitigation (reduce effects to low-moderate levels). It is also noted that the proposed boundary mitigation planting will, in time, also alter the existing open spatial characteristics of this pastoral site, which, in part, contribute to existing rural character values.
87. Care has clearly been taken to address the site-specific characteristics of this block of land. This includes considerable ecological enhancement adjacent to riparian and wetland areas and the proposed location of less dense, large lot residential development on the potentially more prominent high points of the site. Nevertheless, the change in character from a distinctly rural, pastoral landscape to a residential one would be pronounced from surrounding public locations, including SH1. Given the long timeframes for surrounding mitigation planting to be effective (10+ years), it is considered that adverse effects will be at least moderate.
88. The proposal includes an extensive suite of proposed conditions related to maximum dwelling footprint area, maximum dwelling height, maximum external wall length, controls on cladding materials and light reflectance values. In general, I agree that such conditions would be important to ensure residential development is visually recessive in this rural environment.

GF11 and GF11a: Wakari Road area – Rezoning from Rural Residential 2 (RR2) to General Residential 1 (GR1)

89. These sites are currently zoned Rural Residential 2 under the 2GP and are proposed to be rezoned to General Residential 1. The subject area is 23.3 Ha. Estimated feasible capacity is an additional 240 dwellings.
90. The S32 assessment identified that the sites have relatively high rural character and amenity values. It also identified that parts of the area are visible from Wakari Road and in long views from the Roslyn area. Part of the area adjoining the Wakari Road has already been identified for future residential development (RTZ).
91. My initial comments noted that consideration could be given to including some large lot development within these sites to enable a more aesthetically coherent transition from nearby residential areas to the adjacent SNL. It remains my opinion that there is some value in this, however, it is also noted that the potential benefits of this transition on the more elevated parts of the site and adjacent to the Ross Creek, both of which border SNL's, would be relatively localised. As viewed from more distant hill suburb locations, such as Roslyn and Maori Hill, these relatively small areas of large lot development are unlikely to form a particularly prominent or legible transition in built density.
92. It is noted that the proposed subdivision design for this site (dated 16 July 2022, prepared by Terramark), includes larger lots at the highest point of the site, where large lot zoning is recommended. Additionally, grass berms with street trees are proposed throughout the subdivision, including within the small, uppermost part of the site proposed for large lot development. It is considered that if, at the subdivision consent stage (or if a structure plan approach is used), provision is made for larger lots in this area (approximately 1000m²) and street trees are specified at suitable densities, large lot zoning would not be required. It is also noted that the inclusion of the additional 5000m² recreation space, as recommended by PARS, would help to generally enhance the amenity of this new residential area, providing a new green space in addition to the existing encumbrance along parts of the southern boundary of the site.

