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Dunedin City Council
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Dear Laura Mulder

**LANDSCAPE AND VISUAL IMPACT ASSESSMENT PEER REVIEW
LUC 2020-631: PROPOSED TUNNEL BEACH CARPARK AND WALKING TRACK, 30 AND 32
TUNNEL BEACH ROAD, DUNEDIN**

BACKGROUND

Following receipt of LUC 2020-631, Council issued a request for a peer review of the landscape and visual effects assessment (LVA) of a proposed carpark by Dunedin City Council (DCC) at 30 Tunnel Beach Road, located above Tunnel Beach. The LVA was prepared by Anne Lassé on behalf of Beca Limited. The following is a peer review of this assessment.

The application has since been revised post completion of the LVA to include the Tunnel Beach walkway beyond the carpark (at 32 Tunnel Beach Road) and for DCC and the Department of Conservation (DOC) to become joint applicants for this resource consent application (DCC was previously the sole applicant). Subsequently, a desk-top analysis (in the form of a memorandum – Appendix K of the AEE) was undertaken of the modified walking track against the relevant landscape objectives and policies of both the operative District Plan and Second Generation District Plan (2GP). This further assessment was undertaken by Wade Robertson on behalf of Beca Limited. A peer review of this memorandum is also provided in this report.

The LVA and memorandum have been reviewed with regard to the following:

1. Methodology used represents best practice.
2. The proposal is adequately described.
3. Description of the existing environment is adequately covered, including identification of key landscape characteristics, values and attributes.

4. Mitigation measures, options and recommendations are appropriate.
5. Identification of landscape character, natural character and visual effects have been considered and their significance interpreted in relation to the methodology.
6. Potential viewpoints are covered.
7. All relevant statutory matters and documents have been identified and considered.
8. Cumulative effects are identified.
9. Conclusions reflect the findings of the assessment.

PEER REVIEW COMMENT

The following sections include a review of the points outlined above.

1. Methodology

The LVA refers to several landscape assessment guidelines, including the New Zealand Institute of Landscape Architects (NZILA) Landscape Assessment and Sustainable Management Best Practice Note 10.1 (Best Practice Note).¹ The report has utilised a seven-point scale for assessing effects:

- Very Low
- Low
- Low – Moderate
- Moderate
- Moderate – High
- High
- Very High

The scale used in the LVA has been widely adopted in the profession and is the recommended scale in the Tuia Pito Ora NZILA Aotearoa New Zealand Landscape Assessment Guidelines. The LVA also considers the sensitivity of the existing environment as part of its methodology. Overall, the methodology utilised in this report represents best practice.

As the review of the walking track proposal solely focuses on analysis of the track against relevant statutory provisions, no methodology has been outlined in the document for assessing the walking track alterations.

2. Proposal description

The proposals for the carpark and walking track have been adequately described and are supported by landscape plans, cross sections, and materiality drawings.

¹ It is noted that the LVA was undertaken prior to the Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines being approved by Tuia Pito Ora NZILA.

3. Existing environment description

The LVA describes the existing environment of the carpark site in terms of natural character, rural amenity and associations. The report begins by giving a general description of the area, followed by an assessment for existing natural character, rural amenity and associative values.

Existing natural character in relation to the carpark is assessed as low-moderate, and existing rural amenity and associative values are assessed as high (as reconfirmed by the Section 92 response). The sensitivity of the site is assessed as low-moderate. Providing existing environment ratings is helpful for understanding the magnitude of effects from the proposal.

Landscape character in regards to the carpark has not been assessed as a whole, instead the LVA has taken a compartmentalised approach by assessing rural amenity and associative values individually. While I find this approach unusual, I generally agree with the conclusions drawn for the existing environment, however I would consider the existing rural amenity as moderate.

The walking track is located within the South Coast Landscape Preservation Area, as identified in the operative District Plan. The memorandum outlines the attributes of this area that are to be preserved as described within the Plan.

In the 2GP the walking track is located within the Tunnel Beach Outstanding Nature Feature (ONF). The memorandum highlights the landscape values of this ONF as described within the 2GP.

The descriptions outlined in the operative District Plan and the 2GP have been used to provide the existing environment description for the walking track proposal.

3. Mitigation measures and recommendations

The carpark has been designed in response to the 2GP. The form, scale and materials (including their colour and reflectivity) have been carefully considered and chosen to blend in with the existing character of the area.

Key mitigation measures for the carpark include: use of native vegetation to soften hard landscapes, materiality that is in keeping with either natural features or rural activities, materials with low reflectivity, working with topography to minimise the need for cut and fill, retaining a sense of open space, and maintaining and enhancing views.

Appendix 3 of the LVA contains a materiality drawing, which includes a hard materials palette, however, the drawing does not provide details on the finished form (other than overall dimensions) or materials of the toilet block. The LVA also states that the final design of the toilet structure is yet to be completed. Overall, mitigation measures outlined in the LVA are appropriate, although I would recommend including details on the finished form and materials of the toilet block within the resource consent conditions (this is discussed further below).

The walking track proposal seeks to protect the existing natural environment, reduce health and safety risks for visitors, and increase public connection with the area's natural, cultural and historic heritage.

The following design measures have been included in the walkway design to implement the above aims: a more suitable track grade, establishing viewing areas, viewpoint locations situated out of the line of sight of adjoining dwellings and other sensitive activities, installing interpretation panels, providing access to the coastal zone and viewshafts to multiple prominent features of cultural significance, inclusion of cultural elements, track alignment which follows the contour of the land, taking advantage of existing farm tracks, utilising muted tones for materials, and reduced reflectivity of steel safety barriers. Overall, the mitigation measures outlined in the walkway memorandum are appropriate.

5-6. Natural character, landscape character and visual effects

Natural character effects - carpark

In the LVA the natural character assessment of effects considers the impacts of the proposed carpark on the key characteristics identified in the existing environment description. Natural character effects are assessed as moderate due to the fundamental change to the landform.

I consider these effects as overstated and instead assess effects on natural character as low-moderate at most due to the distance of the site from the coast (the site is approximately 130m from the coastal zone identified in the 2GP), the low-moderate existing natural character, the low-moderate sensitivity of the site, and the inclusion of extensive native planting as part of the carpark proposal. Furthermore, as noted by the LVA, the proposal will not change ephemeral coastal qualities associated with weather, nor will it alter the dramatic coastal landforms of the area (with the site itself not being unique in the area) or materially diminish existing expansive ocean views.

Landscape character effects - carpark

The landscape character assessment of effects in the LVA considers the impacts of the carpark proposal on the key characteristics identified in the existing environment description. Effects on rural amenity and associative values are assessed as low. The LVA

notes that elements used in the carpark proposal are common in the adjacent land uses, including earthworks, and that strategic use of vegetation, as well as the carpark being recessed below the existing road level, soften the hard surfacing of the proposal. The LVA states that vegetation will reduce open space but that it will integrate well with the wider landscape. It should be highlighted that Objective 17.2.3 of the 2GP lists natural elements such as trees and bush as a rural amenity element.

The LVA also considers that the carpark will improve people's connection with, and ability to access, the coast. I agree with the above rural amenity and associative values assessment of effects.

Visual effects - carpark

The LVA has considered the visibility of various components in the carpark proposal, including the water tanks, toilet block, and screening vegetation, as well as effects on ocean views. Overall, visual effects have been assessed as either low or very low.

Five representative viewpoints are identified as part of the visual effects assessment for the carpark. These adequately cover the potential viewing audience, and include residents on neighbouring properties, viewers on Tunnel Beach Road, and users of the Tunnel Beach walking track. The viewpoints are helpfully located on a viewpoint location map in Appendix 1 and each viewpoint is supported by a photograph located in Appendix 2. However, it is unclear why the orientation of Viewpoint 5 is towards the north, facing away from the site. Despite this, the visual assessment from Viewpoint 5 is described as if orientated towards the site. Upon my own site visit and taking site photographs I concur with the assessment of effects drawn for this viewpoint.

While my assessment of visual effects for some of the viewpoints differs slightly from that of the LVA, there is no consequential difference between those ratings in the LVA and the conclusions I reached.

The memorandum for the walking track provides a high-level desktop analysis of the track proposal against relevant policies and objectives set out in both the operative District Plan and the 2GP where they relate to the management of visual, natural character and landscape aspects of the coast environment and associated overlays. The memorandum concludes that the walking track proposal will avoid significant effects on existing landscape character and may result in some positive effects. I agree with this conclusion.

7. Statutory matters and relevant documents

The LVA regards the carpark proposal as consistent with the policy framework. The LVA has considered objectives and policies in the 2GP relating to rural residential zones and

landscape and natural character overlays, including provisions regarding rural amenity. I agree that the carpark proposal meets the plan's objectives and policies.

Both the 2GP and the operative District Plan (2006) apply. Where plan provisions are subject to appeal in the 2GP, then both the 2GP and the operative District Plan rules apply. Several of the objectives and policies in the 2GP relating to the coastal character overlays are under appeal. These character overlays are considered in the LVA as part of the wider context of the carpark proposal, however, objectives and policies relating to landscape in the operative District Plan have not been considered. Subsequent to the LVA an assessment against the operative District Plan was undertaken as part of the Section 92 response. The response concluded that the proposed works will be consistent with the relevant objectives and policies of the operative District Plan. I agree with this conclusion.

The walking track proposal has been assessed against both the operative District Plan and the 2GP. It is concluded that the track proposal is consistent with the relevant objectives and policies within these statutory documents. I also agree with this conclusion. However, the memorandum lists Policy 10.2.3.9 of the 2GP as not being relevant to this development. I consider this policy as relevant to the walking track structures, including the safety barriers, interpretation panels, seating, and cultural elements which are to be incorporated within the design, with the need for these structures to avoid or minimise adverse visual effects caused by reflectivity.

Neither the carpark LVA nor the walking track memorandum refer to the New Zealand Coastal Policy Statement 2010 (NZCPS). This statutory document is relevant due to the overall proximity of the proposal to the coast. Those NZCPS policies which are most pertinent to this proposal include Policy 13 and Policy 15. Under Policy 13(1)(a) and 15(a) the application is required to 'avoid adverse effects' on areas of outstanding natural character, ONFs and outstanding landscapes. Additionally, it is required by the NZCPS under Policy 13(1)(b) and Policy 15(b) to 'avoid significant effects' on natural character and natural features and landscapes (other than those classed as outstanding). I consider the proposal to be consistent with these two policies.

8. Cumulative effects

Although cumulative effects of the carpark proposal have not been specifically addressed in the LVA, as the proposal is to remove an existing carpark and to implement a new carpark (which has been designed in response to policy framework), the potential for adverse cumulative effects is reduced.

Similarly, while the memorandum for the walking track proposal has not discussed cumulative effects, as the proposal involves the partial realignment and replacement of an existing track, potential cumulative effects are lessened.

9. Conclusions of the LVA

In general, the conclusions for the carpark proposal provided in the LVA reflect the findings of the assessment. However, in section 7 of the LVA “Conclusions”, it is stated that *“Overall, the proposal for a new carpark will result in **low-moderate** degree of effects on the landscape character of the site and the surrounding area.”* I note that in section 6.1 “Landscape Effects”, natural character effects are assessed as moderate, and effects on rural amenity and associative values are assessed as low. While it is unclear how overall landscape character effects have been concluded as low-moderate in the report, the Section 92 response clarified that this rating was reached ‘on balance’ by considering the assessed effects on rural amenity, associative values, and natural character.

Although landscape character and natural character have overlapping attributes, it is important to consider them separately (as directed by the Resource Management Act 1991 and the NZCPS). While effects on natural character have not been included in the conclusions of the LVA, they are included earlier in the report and are assessed as being moderate. Therefore, the inclusion of natural character effects within the landscape character assessment potentially exaggerates landscape character effects.

The memorandum for the walking track proposal concludes that, overall, the proposal is consistent with the relevant objectives and policies of both the operative District Plan and the 2GP. This conclusion accurately reflects the findings of the memorandum.

SUMMARY

Overall, the LVA provides adequate detail about the carpark proposal and, along with the Section 92 response, is transparent on how the assessment of effects have been reached. I consider that effects from the carpark proposal will be adequately managed and mitigated regarding rural amenity and the coastal character overlay zones. Open space will be maintained on balance, there will be a low density of buildings (only the toilet block), and no existing trees will be removed.

The toilet is set back from the boundaries and the height of the building maintains the character of the area. The location of the building also helps in retaining views. The two above-ground water tanks are not set back from the boundary but there are tanks on the adjacent property (31 Tunnel Beach Road) close to the boundary and the proposed tanks will not be visible from this property due to the existing fence within 31 Tunnel Beach Road, the orientation of the dwelling, existing bunds on the property, and the downward sloping ground where the tanks are located.

The natural character of the site will be maintained. While hard surfacing will be introduced, the existing natural character is low-moderate, it is a significant distance from the coastline,

and only exotic species are present within the proposal area. The proposal will also introduce a large area of native plant species, which will mitigate effects and result in positive biodiversity. Furthermore, the carpark will enhance access to the coast.

To ensure the outcomes discussed in the LVA are achieved, it is recommended that the following are included as conditions:

- i. The final design of the toilet block does not conflict with nearby architectural styles, it ties in with adjacent proposed vegetation, and it is constructed of materials that reduce reflectivity issues. All exterior surfaces, including the toilet block roof, have a light reflective value of 30% or less.
- ii. The existing walking track adjacent to the property boundary of 31 Tunnel Beach Road is relocated south-west to further increase the privacy of this property.
- iii. A landscape implementation and management plan is to be prepared which, as a minimum, specifies:
 - a. plant grades for selected species (at time of planting);
 - b. plant layout, spacing and densities;
 - c. planting methods, including ground preparation and mulching;
 - d. plant and animal pest management strategies;
 - e. a planting programme; and
 - f. measures to monitor and manage all planting so plants establish and those that fail to establish are replaced until an 80% canopy cover is achieved.

The analysis of the walking track proposal focuses on the consistency of the proposal with the objectives and policies of the operative District Plan and the 2GP. While the analysis is brief, it is understood that the track upgrade works are not considered to require a resource consent, however, effects are not to be significant beyond the boundary of the works.

The analysis of the track proposal provided in the memorandum (Appendix K of the AEE) concludes that the proposal is consistent with the relevant objectives and policies of these two statutory documents and that the track will not compromise the existing character or quality of the Tunnel Beach landscape to any significant degree. I agree with these conclusions and that the track proposal has the potential to result in some positive effects, including enhanced native vegetation and protection of existing native plant species.

To ensure the outcomes discussed in the walking track proposal memorandum are achieved, it is recommended that the following are included as conditions:

- i. Walkway structures, including seating, safety barriers, interpretation panels and cultural elements, are constructed of materials that reduce reflectivity issues, with all surfaces having a light reflective value of 30% or less.
- ii. Walkway structures (including those listed above) are constructed of materials with muted tones to blend structures in with the surrounding landscape.
- iii. Cultural elements are designed in collaboration with mana whenua.
- iv. Viewing areas are constructed in areas which avoid sight lines with existing adjoining dwellings.

Based on my peer review of the carpark LVA and the walkway proposal memorandum, and considering the inclusion of the above recommended conditions, I conclude that impacts on natural character, landscape character (including rural amenity) and visual attributes will not be significant and will be no more than minor.

Prepared by:
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