

Peer Review of

ESTATES OTAIHANGA SUBDIVISION PROPOSAL LANDSCAPE and VISUAL IMPACT ASSESSMENT

by

DCM Urban Design Limited



By: Robin Simpson
 Urban Designer, Landscape Architect

Date: 23 December 2021

For: Kapiti Coast District Council

Assessment Summary

This peer review of the DCM Landscape and Visual Assessment for the Application for Otaihanga Estates, finds it to be of standard, good practice methodology although with minor omissions. The assessment is broad level. Due to the variation of the site itself and within the proposal, I recommend closer assessment of specific areas based on more detailed information on existing conditions is appropriate in this case.

I agree with some conclusions of the assessment and disagree with others. I consider it is not possible to come to one overall quantification of effects, as the proposal has two distinct areas which need to be assessed separately. The northern area with larger lifestyle blocks (Lots 1-22) and the southern area with residential, low density lots (Lots 23-49), each propose a different character and therefore have a different effect.

Positively, the proposal would increase housing as intended in the NPS on Housing and could improve the condition of some wetlands and vegetation. In my view, the southern part would not meet the aspirations of the NPS in Urban Design for “well-functioning environments” and the goals of KCDC. This is because it proposes intensive development away from any local centre, continues reliance on motor vehicles and is not actively designed to create strong communities or protect the environment.

The DCM assessment is based on the premise that the site is a continuation of existing residential areas. I disagree and consider that the site forms part of the rural and rural lifestyle zone which, separates Otaihanga and Waikanae township. Therefore it needs to be considered for its role in regional structure planning. The values and intentions of KCDC are expressed in the rural lifestyle zone in which it occurs. My assessment on the information supplied, is that the north part meets these expectations, but the more intense southern part, does not.

For the Northern area, I largely agree with DCM’s assessment of minor effects although further mitigation of the accessway is recommended. This is because the existing unbuilt character with open views, vegetation and quiet private ambience, can be largely achieved while adding new houses. The impact on the character of Tieko Street; and subsequent effect on its residents, is understated.

For the Southern area, I disagree with the conclusion that the effects would be less than minor. DCM understates the effect of loss of distinctive character and privacy due to landform and the loss of rural amenity, through noncompliance with rural setbacks and minimum lot size without adequate mitigation. I consider there would be significant negative effects regarding character, noise, visual effects. Effects could be reduced by reduction in number of lots, revised layout, clustering and increased area for native planting for integration and habitat.

Further discussion is contained in the following pages.

PART A INTRODUCTION

1. INTRODUCTION

1.1. Author Introduction

My full name is Robin Simpson. I am an Urban Designer and Registered Landscape Architect practicing as Robin Simpson Design Limited.

I hold a Masters Degree in Design Studies (MDes.S) specialising in urban design from the Graduate School of Design, Harvard University, Cambridge Massachusetts and a Bachelors Degree in Landscape Architecture (BLArch. Hons 1) from the University of New South Wales, Sydney Australia.

My practice covers Urban Design and Landscape Architecture with particular focus on Infrastructure Development e.g., roads, cycleways, Urban Design for Transport, Land Development, Residential Masterplanning, assessment of visual effects and network functionality and design review. I have sat on urban design review panels for Wellington City Council, Christchurch City Council and Nelson and Tasman City Councils.

I confirm that I am familiar with the Code of Conduct for expert witnesses contained in section 7 of the 2014 Environment Court Practice Note and agree to abide by the principles set out therein.

1.2. Background

I have been approached by KCDC representatives to undertake a peer review of The Landscape and Visual Impact Assessment Report which form Appendix D of the *Otaihanga Estates Resource Consent Applications and Assessment of Environmental Effects*, June 2021 by CHC.

In *Part B: Assessment of Environmental Effects* by CHC, My Hansen summarises the LVIA Report and relies on its findings for conclusions. This is also briefly assessed for comprehensiveness and consistency.

1.3. Scope

The scope of my review is limited to the peer review of the DCM assessment and identification of where my conclusions differ to the original report.

1.4. Structure of Peer Review

This peer review is structured to;

- Replicate structure of Landscape and Visual Assessment for ease of access
- Review Methodology and identify any gaps
- Review Landscape Assessment under headings used in DCM report
- Review Mitigation Measures and assess effectiveness
- Comment on conclusion reached by DCM.

2.2 Assessment References

In undertaking this peer review, I have referred to the following documents;

- National Policy Statement Urban Design
- National Policy Statement Housing
- National Policy Statement Freshwater
- The Resource Management Act (RMA)
- The Wellington Regional Policy Statement (RPS)
- Operative Kapiti Coast District Plan (ODP)

I have also consulted the following to establish best practice in Landscape Character and Visual Assessment;

- *Te Tangi a te manu Aotearoa New Zealand Landscape Assessment Guidelines* Final Draft, 5 May 2021¹
- NZTA / Aurecon / Kensington Swan, *Guidelines for Landscape and Visual Assessment*²

The Application Documents provided by KCDC were;

- *Otaihanga Estates Resource Consent Applications and Assessment of Environmental Effects*, June 2021 by CHC
- *Landscape and Visual Impact Assessment Report*, Revision F, June 2021 by DCM Urban Design
- *Appendix 1 Landscape and Visual Assessment Figures*, Revision F, 29 June 2021 by DCM Urban Design
- KCDC RFI and responses to RFI

I have also referred to Cuttriss and Wildlands Reports which form part of the application, in order to gain more detail than provided in the DCM Assessment.

A recent consultation document from KCDC provided an informal, though not statutory, insight into KCDC values and intentions in a time of change. This is *Te Tupu Pai Growing Well; Community Consultation Document October -November 2021 KCDC*.

¹ Te Tangi a te manu Aotearoa New Zealand Landscape Assessment Guidelines Final Draft subject to final editing, graphic design, illustrations, approved by Tuia pito Ora/NZILA 5 May 2021

² Guideline for Landscape and Visual Effects used in part by NZILA as best practice guideline and provided by WCC

Part B PEER REVIEW

2 METHODOLOGY REVIEW

2.1 DCM Approach

The Report uses a recognised and accepted methodology which I consider appropriate.

2.2 DCM Landscape Characterisation

The Report describes landscape character, with a focus on “natural character”, an analysis of which is required by the RMA Section 6(a) where wetlands and streams are present. This is the case on this site as identified in the Wildlands Report³

Reviewer Comment on Landscape Characterization

I agree with the general discussion on character including Table 1 which proposes a way of looking at natural character as a continuum. However, find the focus on the first category only of “biophysical elements” and “natural character” is incomplete. Other aspects of landscape character such as biophysical processes and cultural responses are less well covered. There is little discussion consideration of Te Ao Māori.

KCDC itself describes character in the Proposed Kapiti Coast District Plan Objective 2.11⁴. Otaihanga is described in paragraph 9 as “..characterised by a quiet low-density area which is set apart from the main urban area. It is strongly linked to the river.”

2.3 DCM Visual Assessment Methodology

The Report proposes an accepted visual assessment methodology including selection of viewpoints, estimating sensitivity of receptors and identification of potential mitigation.

The NZILA Landscape Assessment Guidelines⁵ indicate that properly preparation visual simulations are useful though not required tools. DCM have elected not to prepare these, however I think they would have been useful for key views e.g. from Otainahnga Road to avoid speculation and to provide Council with enough information to assess the effects.

Reviewer Comment on Visual Assessment Methodology

I agree with each of these steps as part of a methodology. I consider that absence of detailed text descriptions of the proposal and/or provision of visual simulations makes assessment of the application difficult for Council.

³ Wildlands Report

⁴ Proposed Kapiti Coast District Plan, appeals version March 2018, Objective 2.11 paragraph 2. Whilst not included in the operative plan is a useful in identifying the aspects which this report has omitted to assess.

⁵ Te Tangi a te manu Aotearoa New Zealand Landscape Assessment Guidelines Final Draft adopted May 2021

2.4 DCM Landscape Values

The Report notes that landscape values are expressed at national levels through National Policy Statements and Acts, and at regional and local levels through the objectives, policies and rules of the district plan. I agree with this.

2.5 DCM Effects Methodology

The Report proposes that the landscape is assessed in its “unmitigated” form and then in its mitigated form”.

Reviewer Comment on Effects Methodology

I agree with the assessment of unmitigated effects first then mitigated effects, though more reference to the drawings/text of the proposal would be helpful.

I agree with the scale used for assessing the magnitude of change as this is good professional practice. However I personally interpret the alignment between the NZILA and RMA terms slightly differently. I consider that where effects are “low” these can be considered minor and if effects are moderate to high these can be considered significant. I will note where this difference is relevant.

3 LANDSCAPE ASSESSMENT

3.1 Existing Landscape Character and Sensitivity to Change

3.1.1 Existing Wider Landscape Character

DCM describe the existing wider landscape character and the proposal site landscape character separately which is appropriate.

The wider site character is described in a series of plans including the Scheme Plan Development Overview, Scheme Plan Earthworks and Ecological Constraints, Settlement Pattern, Planning Zones and topography.

Review Comment

The plans are appropriate though it is difficult to clearly read and interpret the overlaying of factors required in order to assess effects. I recommend that more detailed contour information, with further explanation of levels of cut and fill is provided to clearly articulate the scheme and its context. For example, Figure A Context – Topography, shows a useful but very broad illustration of topography. I found that to assess impact a more detailed contour plan was essential, given the steep terrain and any earthworks effects, and the freshwater vegetation sensitivity to landform changes. The Context – Urban Settlement Pattern, needs to be wider and locate local centres, town centre, housing densities etc.

I agree with descriptions of the wider landscape as “a mixture of natural and modified hills close to existing urban areas consisting of large, heavily undulating grazing paddocks, small farmlets with large houses and plantation plantings”. I agree that the Kapiti Expressway modified the steep dune landform, but do not consider that this negates the typical steep dune/wetland landform as a characteristic of the proposal site.

The general description of housing in the area, I agree with, however in order for Council to assess this proposal thoroughly, further information is necessary. The points I consider need further information are;

- Otaihanga in context of regional structure e.g., relationship to coastal dune and the Waikanae River
- Role of Otaihanga as unbuilt area between townships
- Paraparaumu and Paraparaumu Beach as closest townships
- Distance to local centers at Mazangarb Road
- Tangata whenua presence
- Proximity to Paraparaumu low density housing areas.

3.1.2 Landscape Character the Proposal Site

Character photos A-H, give a general sense of the range of characters. These would be usefully grouped into those showing character of wider area, the adjacent areas and the site itself. I consider it important to describe rural character to north, Lifestyle block character across Otaihanga Road (wider area), Tieko road streetscape, rural character adjoining northwest, farmlets to west (adjacent areas) Pastureland to southern part, pastureland adjacent to expressway (site itself).

The character photos at times drift into a description of the proposal rather than forming a clear baseline against which to assess, e.g. E "*the Otaihanga Road frontage will not change much..*". While not incorrect, the broadness of the images and comments does not provide Council with enough clear information to validate the assessment.

Topography

I agree that topography has a moderate or moderate-high sensitivity to change. In relation to the table in 2.5, I consider is the equivalent the magnitude of effect is "Significant" not "more than minor" as proposed by DCM. Hydrological aspects of topography have not been included.

Vegetation

I agree with this discussion on existing vegetation.

I disagree with the general conclusion that "*sensitivity to change of the existing vegetation is low*". I consider that different vegetation communities have different levels of sensitivity to change. For example;

- "*large exotic shelter belt. along Tieko Street*" are prominent in the visual character (See Figure 2 Proposed Additional Viewpoint). Therefore, this would have moderate to high sensitivity to change
- *wetland vegetation* is sensitive to change of landform, hydrology, built structures and have high value. Therefore, this would have moderate sensitivity to change
- "*Scrubby exotics and natives on rural farmland*" can absorb change and have less character value. Therefore, I agree would have a lower sensitivity to change.

Natural Character (Waterways and Waterbodies)

I agree with this as discussed. This is required by legislation.

Built Structures

The discussion on Built Structures is very broad. The review identifies an area within “500m offset of the proposal site” as relevant to identification of building types. I generally agree with the descriptions and the three built environment scenarios he identifies;

- mix of large rural residential buildings
- low density suburban residential (Tieko and Pitoito Streets)
- little built form (on existing site).

I suggest that a more detailed discussion on built structure would assist Council. I consider that within 500m of the site are 6 clearly different environments which warrant identification. I would add to those identified by DCM;

- farmlets on steep dunes to west
- farmlets on undulating slopes to northwest
- rural land to north and northeast.

It is difficult to see how the conclusion that, “*built form has a low sensitivity to change*” has been generated without more detailed information and explanation.

3.1.3 Effects on Landscape and Natural Character

DCM's assessment makes broad comments on the whole development.

I consider the two different parts of the proposal, Lots 1-22 and associated accessway (Northern Part) and Lots 23-49 and associated accessway (Southern Part) have different characters in terms of dominance of structures, degrees of unbuilt space, vegetation, ambience and land modification. These would consequently have different effects and need to be assessed separately.

Assessment of Effects has been described in Table 2: *Assessment of Effects on Landscape Character and Elements*. I shall comment on the Northern Area and Southern Area separately and respond to the *Effects before Mitigation, Effects after Mitigation* and *Comments*, for each attribute. These should be read in conjunction with the DCM Table 2.

NORTHERN AREA - LOTS 1-22

Landscape Character/ Feature		Effect (Before Mitigation)	Residual Effect (After Mitigation)	Comment	
CHARACTER	DCM	Minor	Less than minor		
	Peer Review	More than Minor	Minor	Similar	<p>Agree magnitude of change is generally low with minor effects after mitigation.</p> <ul style="list-style-type: none"> • Further mitigation required to Lot 1. Effect of removal of mature pines on neighboring property is considered as significant loss of privacy, rural amenity & views • Further mitigation required to Tieko Street. Change to ease of access & loss of rural amenity to residents is considered significant • Further mitigation through planting & drainage swales suggested to mitigate filling of watercourse leading to Wetland 1
TOPOGRAPHY	DCM	More than Minor	Minor		
	Peer Review	More than minor	More than Minor	Similar	<p>Agree magnitude of change is moderate. Consider adverse effects more than minor as these would be noticeable but could potentially be mitigated.</p> <ul style="list-style-type: none"> • Report overstates retention of dune topography as it appears from limited information provided that cutting of dune Lots 12-16 and filling for accessway immediately east of lots 12-16 exceeds permissible depths for rural areas. • Retention of the dune running north south in Lots 6-10 is positive and avoids greater negative effects • Further mitigation through planted swales & low impact stormwater practices would be required to mitigate filling of gully currently draining into Wetlands 1 & 2
VEGETATION	DCM	Minor	Less than minor		
	Peer Review	More than Minor Variable	Minor	Similar	<p>Agree magnitude of change is low. Effects considered more than minor before mitigation as different vegetation is affected differently.</p> <ul style="list-style-type: none"> • Negative effect of biodiversity loss with change to rolling pastureland. Proposed buffer planting around Kanuka stands and wetlands provides mitigation. Further native planting around accessways is recommended. • Removal of mature pine shelter belts would be a significant neutral change to visual character. Where privacy and exposure result, the effect is considered adverse & significant. Further mitigation suggested • Effect on remnant stands of kanuka is avoided through layout and buffer planting provides mitigation. Improved management and restoration work in Wetlands 1, 3, 5 & 7 provides mitigation.
WATERWAYS / NATURAL CHARACTER	DCM	Minor	Less than minor		

	Peer Review	More than Minor adverse	Minor adverse Minor positive	Similar	<p>Agree magnitude of change is low with minor effects after mitigation.</p> <ul style="list-style-type: none"> Agree not identified as an Outstanding Natural Landscape Value as a rural character landscape would change due to smaller blocks, increased visibility of 22 new dwellings and some loss of quiet and privacy through increased activity. Agree mitigated by no build areas and restoring and buffering kanuka stands
BUILT STRUCUTRES	<i>DCM</i>	<i>Minor</i>	<i>Less than minor</i>		
	Peer Review	More than Minor adverse	Minor adverse	Agree	<p>Agree magnitude of change is low with minor effects after mitigation</p> <ul style="list-style-type: none"> 22 new dwellings will adversely effect existing character. This is reduced by no build areas, restoring & buffering kanuka stands, locating building sites with space around The quiet, privacy and rural amenity of surrounding built environments will be reduced but still be present. Predominantly rural activities are likely to change to be a mix of rural and residential activities, the areas of the lots, though smaller than the permitted 3000m², have enough area to enable vegetation to screen and integrate structures Effects of visibility from residences between Tieko & Pitoitōi Sts, are reduced because dwellings will be at a distance. Effects of visibility from the rural farmlets between Tieko St and Otaihanga Rd, are reduced because limited dwellings will be visible from any one viewpoint and dwellings will be screened by landform and clumps of vegetation. I conclude that adverse effects to the residential built environment between Tieko and Pitoitōi Sts will be minor only. I also conclude that the rural residential built environment to the west will retain enough of its rural amenity to be minor only. The area to the north currently has rural ambience with few buildings, activities dominated by rural activities and quiet private ambience. The proposal would introduce a mix of residential and rural activities, but I agree enough of this ambience would be retained, to be acceptable.

SOUTHERN AREA - LOTS 23-49

Landscape Character		Effect(Before Mitigation)	Residual Effect (After Mitigation)	Comment	
CHARACTER	DCM	Minor	Less than minor		
	Peer Review	Significant	Significant	Disagree	Disagree magnitude of change is low as proposal alters landform, drainage, & views, to become housing & accessways, visible from Otaihanga Rd. <ul style="list-style-type: none"> • <u>Mitigation</u> could improve this by, reduced number of lots in clusters, increased open space to allow trees, architectural solutions to minimize earthworks & retaining walls.
TOPOGRAPHY	DCM	Minor	Less than minor		
	Peer Review	Significant	Significant	Disagree	Disagree magnitude of change is low as proposal alters characteristic dune landform, lowers height, changes drainage. <ul style="list-style-type: none"> • Magnitude of earthworks exceeds that allowed in Rural Lifestyle. Ridgeline of L shaped dune running NE-SW beside the existing access track is altered significantly - up to 5m of cutting (estimate only) & filling to the east • Lot 105 intended as a reserve proposes to have gullies filled, changing existing characteristic landform • Extent of Wetland 4 is reduced to approximately half the area • <u>Mitigation</u> could improve this by, reduced number of lots, architectural solutions to minimize earthworks & retaining.
VEGETATION	DCM	Minor	Less than minor		
	Peer Review	Significant	Significant	Disagree	Disagree magnitude of change is low as proposal changes area of unbuilt pasture to, small lots dominated by built form & accessways. <ul style="list-style-type: none"> • <u>Mitigation</u> could improve this by, reducing number of lots & arranging in clusters with increased open space to allow trees to integrate buildings & improve biodiversity.
WATERWAYS & NATURAL CHARACTER	DCM	Minor	Less than minor		
	Peer Review	Significant	Significant	Disagree	Disagree magnitude of change is low as proposal alters dune landform, drainage, open views of unbuilt pasture to become modified landform, predominantly built residential forms & accessways, visible from Otaihanga Rd. <ul style="list-style-type: none"> • <u>Mitigation</u> could improve this by, reduced number of lots in clusters, increased open space to allow copses of trees • Wetland 4 degraded condition is accepted. This is proposed to be a "stormwater lot". This has potential to have a positive effect on vegetation as a planted wetland & increasing biodiversity. More information needed.
BUILT STRUCTURES	DCM				
	Peer Review	Significant	Significant	Disagree	Disagree magnitude of change is low as proposal alters dune landform, drainage, open views of unbuilt pasture to become modified landform, predominantly built residential forms & accessways, visible from Otaihanga Rd. <ul style="list-style-type: none"> • The lifestyle blocks across Otaihanga Rd would experience loss of rural amenity and increased visibility of built structures. Due to small lots & lack of opportunity for planting, this will be a significant adverse effect • <u>Mitigation</u> could improve this by, reduced number of lots in clusters, increased open space to allow copses of trees, architectural solutions to reduce volume of earthworks and retaining walls

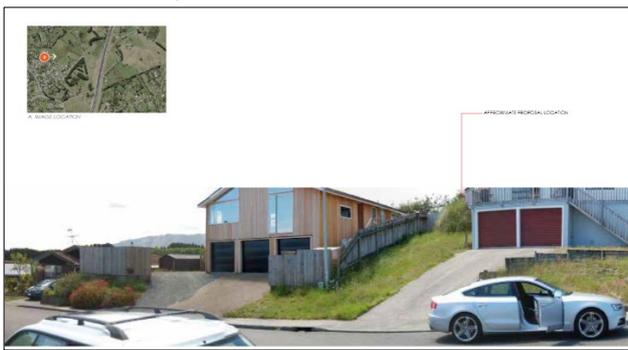
The statement in Paragraph 2 notes “*The character of existing houses is detached dwellings, which the proposal intends to continue, albeit at a greater density.*”⁶ This requires more detail on existing character and the proposal. The single aspect of continuing to propose detached dwellings, I consider insufficient to form the basis of assessment of effects.

I agree that the character will change.⁷ Change in itself, is neither positive nor negative but this is not articulated. DCM proposes a number of mitigation measures. I agree that all are positive tools for mitigation but, I do not agree in all cases that the application of each tool as shown in the scheme plans, would result in the effect stated.

3.2 Visual Amenity

DCM selects nine views, VP1-VP9, in *Landscape and Visual Assessment Figures*. These are generally supported. Information could be more helpful to Council if;

- VP1 better represented effects on residents in small farmlets to west of site. VP1 has limited value in assessing visual effects⁸
- VP9 Pitoittoi Street provides limited information. Reviewer proposes another location at the end of Pitoittoi Street shown in Figure 1 below.



DCM VP9



Reviewer VP10

Figure 1 Comparison of DCM VP9 Pitoittoi St and Reviewer VP10 from end of Pitoittoi St

DCM 3.1.3 para 2⁶ *The character of existing houses is detached dwellings, which the proposal intends to continue, albeit at a greater density.*”

⁷ DCM 3.1.3 para 4 “Overall the character and landuse of the area will shift from open and agriculturally focussed to a more concentrated, high amenity development for Lots 20-49.

⁸ VP1 Reviewer acknowledges the difficulty in accessing viewpoints to assess change due to proposed mature pine removal.

3.3 Visual Amenity Effects

DCM elects to assess effects on residents at selected locations, vehicles using roads where proposal is visible and pedestrians and cyclists. I agree with inclusion of these users, as mobile users give an indication of the visual role the area plays regionally.

The assessment of visual amenity does not include visual simulations which are frequently included to demonstrate the existing condition and change arising from the proposal. This is not required, but if not included, accurate text descriptions are needed to enable rigorous assessment. In this case, I find the lack of a visual simulations and limited textual information makes it difficult to come to an accurate assessment. For example VP3 View Northeast from near Otaihanga Road – the Scheme Plan Earthworks⁹ indicates the ridge to the left would be up to 5m lower, the midrange low area would be filled, and 3 rows of dwellings could be visible across the full width of the image, broadly estimated to be up to 15 dwellings. I suggest the conclusion by DCM of *low* magnitude of effect and *less than minor* visual effects (3.3, Table 3) is unconvincing without further information and explanation.

⁹ Reviewer referred to the information available on Drawing No 22208 SCH Rev K, *Scheme Plan Earthworks* dated 11/20 by Cuttriss which provides more information on levels than provided in the DCM Landscape and Visual Assessment. These comments are assumptions and need to be verified but are included by way of example.

Table 3: Assessment of Effects on Visually Sensitive Receptors

DCM VIEWPOINT		Effects (Before Mitigation)	Residual Effect (After Mitigation)	Comment	
VP 1	DCM	Minor	Less than minor		
	Peer Review	More than Minor	Minor	Effects understated	<p>Information required to clarify spatial relationship between property boundary/31F Tiekio St/existing pines. Assessment relies on speculation rather than illustration through visual simulation.</p> <p>Agree that magnitude of change is "moderate". Proposed removal of mature pines would result in loss of privacy, shelter & a landmark. However, the presence of pines is not all positive, the trees appear mature occupy wide areas of land & have low biodiversity. Effect of vegetation within receptor property may reduce adverse effects.</p> <ul style="list-style-type: none"> Mitigation is suggested to reduce adverse effect & promote positive effect by replacement planting of shelter belt with fast growing native species for immediate & long-term effect.
VP 2	DCM	Minor	Less than minor		
110 Otaihanga Rd	Peer Review	Significant adverse effects	More than Minor	Disagree	<p>Assessment requires illustration through visual simulation. Disagree that magnitude of change is "low" (DCM). I consider it to be "moderate-high" as the landform shown on left of view is to be lowered up to 5m and an estimated 3 rows of dwellings visible.</p> <p>Disagree that the adverse effects are "minor" (DCM). I consider it to be "significant" as the dominance of buildings would replace a view of pasture and rural ambience. This is not anticipated in this zone. This would be experienced by vehicles and recreational walkers and cyclists along Otaihanga Road. Effects for residents at 110 Otaihanga Rd are decreased due to distance from the road and vegetation within existing properties.</p> <ul style="list-style-type: none"> Mitigation is suggested to reduce adverse effect further by; decreased number of lots, increased lot size, clustering building sites to enable vegetation to integrate buildings, increased planting to accessway.
VP 3	DCM	Minor	Less than minor		
134 Otaihanga Rd	Peer Review	Significant adverse effects	More than Minor adverse	Disagree	<p>See all points above.</p> <p>Assessment requires illustration through visual simulation Disagree that magnitude of change is "low" (DCM). I consider it to be "moderate-high". Cuttriss Scheme Plans indicate, the change would be;</p> <ul style="list-style-type: none"> landform is to be cut up to 5m and low pasture filled foreground will be a constructed wetland (yet to be described) with a 5m embankment between the wetland and houses an estimated 3 rows of dwellings within excess of 10 dwellings could be visible in this view frame.
VP 4	DCM	Minor	Less than minor		
150 Otaihanga Rd	Peer Review	Significant adverse effects	More than Minor adverse	Disagree	<p>See all points above.</p> <p>Assessment requires illustration through visual simulation. Potentially the majority of Lots 23-49 and the accessway could be visible from this point.</p>
VP 5	DCM	Minor	Less than minor		
	Peer Review	Less than Minor	Less than Minor	Agree	<p>This demonstrates the proposed site is not visible from here. The information provided here is less about visual impact than character.</p>
VP 6, 7,8					<p>Viewpoints 6-8 are taken from the WCB to the east of the Expressway. The viewpoints show views in the <u>direction</u> of the site but do not take</p>

					<p><u>elevation</u> into account. <i>The Context – Topography</i> Drawing by DCM indicates an elevated dune landscape to the east.</p> <p>Absence of visual simulations means all my comments have estimated information from a range of drawings by both DCM and Cuttriss.</p>
VP 6	DCM	Less than minor	Indiscernible		
	Peer Review	Less than minor	Less than minor	Generally agree	<p>See comment above on viewpoint & visual simulations.</p> <p>I estimate that in a speculative 60-degree view cone from VP6, Lots 6-9 would be visible.</p> <p>The no build zone includes the 3 dune peaks (18-20m)¹⁰ visible in the image, with building sites shown beyond the ridge. The dune remains, retaining existing characteristic landform & providing natural screening. A dwelling on Lot 9 may be visible depending on house height. The building pad at 11.3m could allow a 3-floor building. These are positive & successful mitigation measures which avoid domination by dwellings & retain rural character.</p> <p>The requirement for open farm fences will reduce evidence of the subdivision. This is supported.</p> <p>The subdivision is likely to change landuse to a degree, with land in different owners. It can be reasonably anticipated that vegetation could change to include more exotic plants but remain dominated by unbuilt areas. I therefore consider the effects to be less than minor rather than indiscernible for vehicles. I agree effects would be minor and mitigated to less than minor for walkers, cyclists and riders.</p>
VP 7	DCM	Less than minor	Indiscernible		
	Peer Review	Minor	Less than Minor	Generally agree	<p>See comment above on viewpoint & visual simulation. Effects discussed above in VP 6 are relevant to VP 7.</p> <p>In addition, the pines to the left of the image are proposed to be removed which I consider a change, but a neutral effect. In their place 3-4 building sites are proposed. These buildings are likely to be visible but distance from the viewers moderate the effect.</p> <p>I therefore consider the mitigated effects to be “less than minor”, rather than “indiscernible”, for vehicles. I agree effects would be <i>minor</i> and mitigated to <i>less than minor</i> for walkers, cyclists & riders.</p>
VP 8	DCM	Less than minor	Indiscernible		
	Peer Review	Minor	Less than Minor	Generally agree	<p>See comment above on viewpoint & p visual simulation.</p> <p>The mature trees across the midrange of the image are assumed to remain as these are outside the site. The restored wetland 1 occupies the strip immediately adjacent to the expressway. With the proposed 10m buffer planting and Kanuka planting the change will be a positive effect reinforcing native ecologies and character. The building site for Lot 4 may be visible on the dune crest to the far left of the image. This is a visual quality common in the area of rural residential zone.</p>
VP 9	DCM	Minor	Less than minor		
	Peer Review	More than Minor	Minor	Generally agree	<p>This view provides limited information. It indicates that from street level the ridge screens the proposed site from the viewer. However, the upper story of dwellings is likely to look across rural lifestyle blocks to the site. Therefore, I consider a viewpoint at the NE end of Pitoitoi Street reveals more. See 3.2 discussion. This shows the row of mature pines in the distance. These are proposed to be removed, which I consider a visible change to a landmark which can be mitigated to enhance positive aspects of this change.</p>

¹⁰ Scheme Plan Earthworks Revision K Nov 2020 by Cuttriss

3.4 Visual Amenity Effects Summary

The Review responds to each of the views in the above table. In summary I generally agree with the assessment of Visual effects for the northern part (Lots 1-22), as the scheme retains enough of the key visual characteristics of rural zones. The exception is the effect of removal of the mature pines. This requires further mitigation.

I disagree with the assessment of visual effects for the southern part. Whilst change in itself is not negative, I disagree with the reasons given for being acceptable i.e. that this density already occurs nearby (this is denser than any adjacent area), that this area continues area of existing suburban housing (the south part is separated by farmlets on steep dunes and the north part is separated by rural and rural residential areas).

3.5 Landscape Values

In 3.5.1 DCM identifies Policy Statements, Acts, Regional Plans and local plans which articulate the wider public landscape values although I note the KCDC Proposed District Plan (PDP) has been used over the Operative District Plan (ODP). I agree with this approach to establishing wider landscape values.

As with the previous comments, the effects of the northern part and the southern part differ significantly and should be considered separately.

Section 6 of the RMA

Northern Part (Lots 1-22)

Agree

I agree with the response to Section 6 of the RMA regarding identification and preservation of natural areas. Wetlands have been suitably protected and improved through inclusion in a single proposed lot, fencing, weeding, planting and buffer planting. No build areas adjacent to the Expressway for Lots 5-22 suitably retain the dune ridge and assist integration of the development.

Southern Part (Lots 23-49)

Disagree

I disagree with the response to identification and preservation of natural areas as the significant earthworks remove the southwest end of the natural dune form by cutting highpoints up to 5m and filling low points.¹¹ The retention of the dune in Lots 29 and 30 is acknowledged and supported.

The degraded wetland adjacent to Otaihanga Road is not considered a natural element. The proposal to construct a wetland here, depending on its treatment, could be a positive addition. I recommend continued involvement of Wildlands to maximise the potential benefit.

National Policy Statement on Urban Design

Policy 8 guides local authorities to respond to “significant” capacity increase and contribution to well-functioning urban environments” even if “unanticipated” (a) and “out-of-sequence” (b). I consider the overall site to be both “unanticipated” and “out-of-sequence” but that the southern part which forms the main contribution to housing capacity, does not contribute to well-functioning urban environments.

Northern Part (Lots 1-22)

Agree

Southern Part (Lots 23-49)

Disagree

¹¹ Cuttriss Earthworks Plan indicates the southwest part of the dune has peaks at c14m and c17m and cutting is proposed to result in building platforms in this location ranging from 10.15m to 10.6m.

I disagree that the proposed subdivision naturally extends residential development at Otaihanga. At a regional scale the rural and rural lifestyle area of Otaihanga form a largely unbuilt separation between Paraparaumu/Otaihanga and Waikanae township. There is an area of lifestyle blocks on steep dune topography which separates the southern part of the site from existing residential development.

I also disagree that it is “*in-sequence*”. In consultation documents¹², whilst not adopted, this area is shown “for study” not as a priority development area.

The NPS UD relies on well-functioning urban environments. While the northern part has less adverse effects and so more readily absorbed into the existing environment, I would not describe the southern part as contributing to a well-functioning environment. This is because;

- It does not consolidate existing urban form, it dissipates it
- It is 5km from the nearest centres of Paraparaumu or Paraparaumu Beach
- The local amenity centres for Otaihanga are two locations at Mazengarb Road more than 2.5 km away
- It is reliant of private vehicles and does not contribute to low carbon futures.

New Zealand Coastal Policy Statement

Northern Part (Lots 1-22)

Agree

Southern Part (Lots 23-49)

Agree

The scheme contributes positively to wetlands and natural vegetation overall. See previous comments on retention of distinctive dune landform.

National Policy Statement – Freshwater Management

Northern Part (Lots 1-22)

Agree

Southern Part (Lots 23-49)

Agree

In 3.5.2 DCM identifies the Wellington Regional Policy Statement 2013 and the Wellington Proposed Natural Resources Plan (PNRP) as forming the framework of community values, They discuss KCDC Proposed District Plan (PDP) over the Operative District Plan (ODP) as articulating landscape values. I agree with this approach.

I generally agree that the scheme meets the objectives of the Regional Plans in the northern part. However I disagree that the southern part achieves these objectives. For example;

- Regional Form Objective 22- the 26 lots do not contribute to a compact well designed and sustainable regional form
- Character Objective 22- they do not reflect the unique identity of place (2a) nor protect and enhance distinctive landforms (2d).

Northern Part (Lots 1-22)

Agree

Southern Part (Lots 23-49)

Disagree

The Proposed District Plan has been used to discuss community values. I agree the site is not classified as an Outstanding Natural Landscape (ONL) or a Special Amenity Landscape (SAL). I shall therefore respond to each of the Objectives and Policies giving examples where my view varies from those of DCM.

¹² *Te Tupu Pai Growing Well; Community Consultation Document* October -November 2021 KCDC.

PDP PROVISION		REASONS FOR RESPONSE	
CHAPTER 2 OBJECTIVES:			
O2.3 Development Management	<u>Northern Part (Lots 1-22)</u>	Agree Achieved	
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	Does not consolidate urban form given distance to local centres. Area plays a role in regional structure as it separates Waikanae & Otaihanga. Spreading the residential footprint into the unbuilt area merges rather than consolidates.
O2.4 Coastal Environment	<u>Northern Part (Lots 1-22)</u>	Agree Achieved	
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	Key elements of landform are not retained. Lot sizes are considered inappropriate as sand geology & setbacks make small lots hard to build on. I disagree that "subdivision (both earthworks & layout) has been designed to minimise effects on underlying dune" This part of the dune is removed.
O2.9 Landscapes, Features & Landforms	<u>Northern Part (Lots 1-22)</u>	Agree Achieved	
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	I do not consider the "underlying topography is less sensitive" near Otaihanga Rd. This is due to the high modification of the landform through cutting & filling. I disagree that "(both earthworks and layout) has been designed to minimise effects on underlying dune." as the dune is removed.
O2.11 Character & Amenity Values	<u>Northern Part (Lots 1-22)</u>	Agree Achieved	
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	Most of Lots 23-49 will be visible from Otaihanga Rd & residences opposite. This is an intensity of buildings not visible elsewhere in Otaihanga. The site is not close to local centres in Mazengarb Rd (2-2.5km), approximately 5km from the Paraparaumu town centre & not immediately adjacent to existing housing. Lot size leaves little space for planting to integrate buildings, reduction in setbacks for rural areas would reinforce dominance of buildings.
CHAPTER 2A DISTRICT-WIDE POLICIES:			
DW1 Growth Management	<u>Northern Part (Lots 1-22)</u>	Agree Achieved	Agree because lot size and space between buildings allows vegetation to maintain predominantly unbuilt views.
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	This is not anticipated as a development area nor identified as a priority area. The proposal removes unique character of rural areas as lot size means buildings would dominate views, there is little public space to provide visual relief although Lot 105 maintains some sense of openness. A rural residential character with less lots & different layout could achieve this.
DW4 Managing Intensification	<u>Northern Part (Lots 1-22)</u>	Agree Achieved	I support the balance of built and unbuilt areas both due to the no-build zones, larger lot sizes & increase of protected vegetation areas.
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	The southern area is visually separate from the overall site, so it is incorrect to say that no-build areas manage building bulk & scale. The no-build area on the dominant dune in Lots 29,30 screens views from the Expressway, but not from Otaihanga Road & adjacent properties. Landform in the southern area is highly modified & does not "retain its character" of steep dunes with pasture.
DW10 Accessibility	<u>Northern Part (Lots 1-22)</u>	Agree in part	Shared paths are supported. Public access to shared paths needs to be clarified. A full circuit of shared path to KCDC regulation width which connects to Tieko St/Otaihanga Rd intersection is ideal. Sharing of access to Lots 20, 21 & 22 is unclear. This would require careful design that is acceptable to Council.
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	While lot 105 is proposed to be vested in council, this appears more a remnant than an ideal recreation area. Without this area, the location does not achieve

			the 400m proximity to open space expected of “residential” areas. This appears to offer limited open space opportunities. Is Lot 20 or a joined area of Lots 105 & 200 preferable? This requires further discussion with KCDC parks personnel.
DW11 Parks & New Development	<u>Northern Part (Lots 1-22)</u>	Agree in part	See DW10 above
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	See DW10 above
DW14 Amenity Values	<u>Northern Part (Lots 1-22)</u>	Agree	See O2.11 above
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	See O2.11 above
CHAPTER 3 NATURAL ENVIRONMENT			
P3.12 Protecting Outstanding Natural Features & L'scapes	<u>Northern Part (Lots 1-22)</u>	Agree	
	<u>Southern Part (Lots 23-49)</u>	Agree	
P3.13 Special Amenity L'scapes	<u>Northern Part (Lots 1-22)</u>	Agree	
	<u>Southern Part (Lots 23-49)</u>	Agree	
CHAPTER 4 COASTAL ENVIRONMENT			
P4.1 Coastal Environment	<u>Northern Part (Lots 1-22)</u>	Agree in general	
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	“Elements & features which contribute to the character, landscape & visual quality” are not retained particularly as regards landform. I consider the dominant dune as L-shaped & extending southwest toward Otaihanga Road, not linear as shown by Cuttriss ¹³ . The southwest arm of the dune is removed. An estimate of footprint (needs to be confirmed) indicates that the area of dune highly modified is similar to the area of dune preserved along the northeast boundary of Lots 29 & 30. That retention is effective and supported.
P4.3 Preservation of Natural Character	<u>Northern Part (Lots 1-22)</u>	Agree in part	I consider the adverse effects have been mitigated by layout, lot sizes, buffer plantings, wetland restoration. Further mitigation of adverse impact of removal of mature pines in the Tieko Street extension is recommended.
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	I disagree that there are no significant adverse effects in the southern part as explained in 3.1.3 <i>Effects on Landscape and Natural Character</i>
P4.4 Restore Natural Character	<u>Northern Part (Lots 1-22)</u>	Agree in part	Areas around wetlands & remnant kanuka stands have been set aside & enhanced. Further indigenous habitats are encouraged. Opportunities exist in LISW design for northern accessway & screen planting replacing mature pines.
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	The southern area will be a fully urbanised environment. Rows of street trees proposed for accessways & the Otaihanga Rd frontage in the Landscape Planting Plan ¹⁴ , reinforce the urban character. These are lost opportunities to reinforce local rural character & local ecologies. The constructed wetland is an opportunity to plant indigenous species (as opposed to grass).
P4.5 Amenity & Public Access	<u>Northern Part (Lots 1-22)</u>	Agree in part	See P4.5 comments above

¹³ Drawing No. 22208 SCH1 Rev K, Nov 2020, *Scheme Plan Landscape Constraints* by Cuttriss

¹⁴ 29 June 2021 Landscape Planting Plan by DCM

	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	See P4.5 comments above
P4.7 Natural Dunes	<u>Northern Part (Lots 1-22)</u>	Agree in general	See P4.1 comments above
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	See P4.1 comments above
CHAPTER 7 RURAL ZONE POLICIES:			
P7.2 Rural Character	<u>Northern Part (Lots 1-22)</u>	Agree in general	
	<u>Southern Part (Lots 23-49)</u>	Disagree Not achieved	I disagree with the statement that the Lots close to Otaihanga Road "will be seen as an extension of existing residential housing". To the west is an area of farmlets on steep dunes which separates the site from more dense housing. Housing opposite is rural lifestyle, set back from the road & with planting.
P7.6 Management of Conflicting Uses	<u>Northern Part (Lots 1-22)</u>	Agree	
	<u>Southern Part (Lots 23-49)</u>	Agree	
P7.10 Household Units and Buildings	<u>Northern Part (Lots 1-22)</u>	Agree	Open fencing supported
	<u>Southern Part (Lots 23-49)</u>	Disagree	Lot size is smaller than allowed in rural zones. Intention to seek variation from setbacks rule, indicates this density is not anticipated. Smaller lots are unlikely to fit an additional flat. <u>Mitigation</u> measures could include; reduced number of lots, sizing & layout which considers built form, & clustering to enable separation by screen planting
P9.5 Protect via Natural Buffers	<u>Northern Part (Lots 1-22)</u>	Agree	
	<u>Southern Part (Lots 23-49)</u>	Disagree	This does not apply to southern area. Additional natural buffers recommended.
CHAPTER 11 INFRASTRUCTURE			
P11.2 Reverse Sensitivity	<u>Northern Part (Lots 1-22)</u>	Agree	WCB path built with the Expressway has good capacity for additional users therefore the development utilises existing infrastructure.
	<u>Southern Part (Lots 23-49)</u>	Agree in part	Residents would be car reliant because of location (5km to town centre). Therefore additional vehicles will be added to existing roading network.
P11.4 Managing adverse effects	<u>Northern Part (Lots 1-22)</u>	Agree	
	<u>Southern Part (Lots 23-49)</u>	Agree in part	Careful LISW design is required around northern laneway as earthworks fills an existing watercourse draining to Wetland No 1.

4 MITIGATION MEASURES

DCM have proposed eight mitigation measures. I agree all of these are valid and helpful mitigation tools. Where my opinion varies is in the effectiveness of their application. DCM have applied these measures and assessed the effects on landscape character and visual amenity before and after application. As can be seen in Tables 2 and 3, I do not agree with all the DCM assessments. Please see these tables for details.

In general I agree with the mitigation measures and their effectiveness for the Northern Area (Lots 1-22).
Additional mitigation is recommended for;

- adverse effects on privacy for 31f Tiekoo Street with removal of the mature pine shelter belt
 - adverse effects on Wetland 1 vegetation caused by filling watercourse to create Tiekoo Street extension accessway
- In the Southern Area (Lots 23-49) I disagree with the effectiveness of many of the mitigation measures proposed. These are noted individually below.

	Description	Review Comment	Reviewer Additional Mitigation Measure
MM1	Location of house type	Diversity is positive but disagree adverse effects of dense housing are suitably mitigated	<ul style="list-style-type: none"> • Reduce adverse effect by limiting no. of smaller lots • Cluster houses to allow planting to integrate buildings
MM2	Location of lot size	Range of lot sizes is positive but disagree adverse effects of southern part are suitably mitigated	<ul style="list-style-type: none"> • See above
MM3	Street Amenity/LISWD	Agree in use of LISWD including swales & detention basins. Street vegetation as mitigation is positive could be more effective	<ul style="list-style-type: none"> • Increase local plant species in watercourses • Plant detention basins with local species • Design form & vegetation of constructed wetland with Wildlands to increase biodiversity & local character
MM4	Provide walk/cycleway	Positive inclusion Distance from amenities encourages car reliance	<ul style="list-style-type: none"> • Needs to be fully public and to KCDC standards • Continue shared way along Tiekoo Street
MM5	Protect Topography	East Dune protection in no build area agree is effective. Disagree that this has been applied effectively in in southern area as large area of dune removed	
MM6	Fencing Type	Agree with mitigation	
MM7	Protect Wetlands	Agree with mitigation of protection and buffer planting	
MM8	Protect vegetation	Agree with mitigation of protection and buffer planting	<ul style="list-style-type: none"> • Replanting of suitable native shelter to create shelter & privacy between accessway/ 41F Tiekoo St. Include some large size & fast-growing plants.

5 CONCLUSION

The DCM assessment follows a sound methodology. Visual simulations would have been very useful in this situation to illustrate the proposal with more accuracy. I acknowledge that visual simulations are not a requirement for landscape and visual assessments. Simulations for key views e.g. from Otaihanga Road, would provide essential information to assist Council in their assessment of the proposal.

The relevant statutory provisions are considered in the report. Whilst I do not always agree with the DCM assessment, I agree the provisions form a solid framework which indicates community values. I have noted where I come to different conclusions on landscape effects. This is largely for the southern area where I consider changes would be required to avoid significant adverse effects. I generally agree with the reasoning and conclusions drawn regarding the rural residential part in the northern area. In both northern and southern parts, more information on the base condition and existing character with a finer grain of description and analysis of effects, would be of more assistance to Council.

The report identifies useful mitigation tools, however I found the effectiveness of the mitigation is overstated in parts. Without sufficient explanation from DCM, I have come to different conclusions as to some effects of the proposed scheme.

I consider the lesser adverse effects of the northern part make this area of the scheme acceptable. The significant adverse effects on landscape character and visual amenity of the southern part, make this area of the scheme less acceptable.

-----End-----

