

Memo –

TO_ Laura Buttimore

NPDC REF_ SUB21/47781

DATE_ 14 December 2021

SUBJECT_ Ms Mannor's Response to Planning Notification Decision – Landscape Matters

POSTAL_ 2 & 42 Leith Road

Dear Laura

Scope of Peer Review

Ms Mannor takes issue with the scope of the Peer Review provided in two communications to NPDC. It is standard practice to follow a set series of questions with regards to reviewing Landscape Assessment.

Examples of Peer reviews that follow a similar methodology as my own can be found via a quick search on the internet. Mr Bain from Blue Marble also carries out peer reviews in a similar manner – Council and Mr Bain have various examples of this. Although it may be the case of other professions to simply state that the credentials and methodology are satisfactory, this is not necessarily the case for Landscape Assessment.

Effects assessments require professional judgement and the assessment of a variety of layers of information. Practitioners do not always land at the same conclusions. This is standard practice. As someone who prepares Landscape Assessments for clients as well, I am well aware of the process – it is accepted that someone peer reviewing my work may not have the same conclusions.

Private Receptors

Neighbours, including 19, 43, and 63 Leith Road have provided written approval.

Main Issues of contention.

Cutting to the chase, the main issue in my assessment of effects is the prominence and dominance of Lots 2 & 3 due to

- a) Its layout
- b) Its location on the elevated land adjacent Leith Road.

In my peer review I restated the LVIA's description of the key components of the site:

- 1) *"The defining aspects of the site (in the area of Lots 1 – 3) that contribute to its rural character are spaciousness and generally elevated outlook".*
- 2) *"Overall, the site's distinctive landscape pattern arises from its elevated parts of open pasture and roadside hedge".*

My review outlined the reasons why I was concerned about the loss of the elevated land adjacent to Leith Road and point 2 above of the LVIA's assessment underscores my concern.

The Restricted Discretionary criteria within Rur 78 of the ODP provides guidance as to what elements of a proposal may be considered with respect to effects. In this instance, discretion is not limited.

These criteria include among others:

- 4) Consideration towards the number of ALLOTMENTS proposed and if they will lead to intensive land uses that are not typical of RURAL CHARACTER;
- 5) Whether the subdivision and resulting built form will be highly visible in the landscape or whether this can be avoided, remedied or mitigated by the placement of identified BUILDING platforms or other design and layout considerations.
- 6) Design and visual treatment of the subdivision and resulting development including consideration towards techniques such as softening with vegetation, screening, planting, boundary treatment and BUILDING and STRUCTURE design, and the use of materials, colour and reflectivity.
- 10) The cumulative effects of the subdivision.
- 11) Whether alternatives to the subdivision have been considered including location, sizes and the number of ALLOTMENTS.
- 18) Effects of ALLOTMENT size and shape on the RURAL CHARACTER of the area, amenities of the neighbourhood and the potential efficiency and range of uses of the land.
- 19) Whether the subdivision will lead to increased land use conflicts and reverse sensitivity concerns.
- 23) Whether the size of the ALLOTMENTS enables use of them in compliance with the relevant rules of the plan for permitted activities or standards and terms for controlled activities (i.e. setback requirements, etc).

The LVIA recommends development and design controls on dwellings including one measure regarding vegetation. These include:

1. One dwelling per lot
2. 40% max LRV to walls and 20% LRV to roofs
3. 6m height limit
4. Rural 'open' style fencing of boundaries (not restrictions to the lot as a whole)
5. No cuts over 1.5m
6. Hooded lights
7. Black water tanks – or screen them behind vegetation
8. 5m set back from the knoll of the hill
9. Retain the roadside hedgerow.

I do not consider that the effects, cumulative and combined, of the subdivision (particularly Lots 2 & 3) have been mitigated by the above to the point where the effect on rural character is no more than minor. There are two recommendations which I made in the original peer review that still stand re: the receiving environment.

The following points help outline where I am with respect to effects:

- 1) I consider the rising landform adjacent to Leith road should not be built upon, dwellings should be located in such a way where its integrity is preserved. There is land that falls away to the east that would avoid earthworks on the knoll, and locate dwellings more sensitively in the landscape. Such a location would assist in avoiding the prominence of two sets of built form on the highest points of this part of the landscape. This may mean an increase in the depth of both or one of the lots from Leith Road (most likely Lot 3). Or It may mean additional information is provided to demonstrate how its preservation will be achieved. A 5m setback from the crown of the hill was recommended by the LVIA and I noted in the peer review that the 15m/10m side setback would apply to construction of buildings if the boundary aligned with the crest of the hill. Such preservation, as seen from the state highway and entrance to Leith Road would preserve the most “distinctive landscape pattern [arising] from its elevated parts of open pasture” as described in the LVIA.

- 2) The ability of the scheme to preserve the landscape form could be illustrated by providing cross sections or installing stakes on site where the building platform will be; visuals such as 3D bulk and location perspective views could have been provided, or photomontages.
- 3) At the very least, I recommended further vegetation buffers and screening be included to assist with softening and screening the stacking of dwellings on Lots 2 & 3 from both the north (retain vegetation along driveway to 42 Leith Road), east – to reduce the impact of the cumulative effect of three dwellings on the broader landscape – and south around a dwelling – to screen and soften the impact of the built form which will occur on Lot 2 & 3 in conjunction with the existing dwelling. This was not considered necessary by the applicant's agent.
- 4) Larger lots will provide greater 'spaciousness' and more options for locating built form sensitively with respect to the rising part of the landform. Vegetation could be located around built form rather than lot boundaries. They would also allow for potential future productive management of the area, and provide openness to the development between each lot. They would also provide a greater buffer between 'rural-residential' use and the farm environment. Realistic effects of living next to a 'dairy' farm are flies, motorbikes at 4am, smells, etc...having larger lots allows greater separation between intensive farm management and more 'sensitive' uses.
- 5) Retaining grazed land between Lots 2 & 3 and the existing race retains productive land in the farm but does little for the appearance or retention of 'spaciousness' within the Lots themselves when seen from Leith Road or turning into the road from the State Highway. On the contrary it restricts the way in which the smaller lots can be used/developed, forcing all built form to be stacked adjacent each other. It is not just dwellings that occur on rural-residential lots, it is garaging/sheds, pools, glass houses, washing lines, all the things that come with people seeking 'more space'. This is evident around the region including many examples nearby. Sheds on smaller rural-residential lots are often large – they are built to take boats, campervans, multiple cars, people may work from home in workshops, or store various types of sporting equipment.
- 6) I am not saying that a lot should be removed, I'm saying their design and layout need to take account of the underlying landscape context, its distinct features, the value it provides to the context of the landscape and experience of rural character, and finally, how the proposed lots sit within the broader subdivision development.
- 7) My recommendations are not onerous or out of the ordinary for a subdivision scheme of this scale – the area is close to Ōkato, and given the demand for land and housing in the local area (based on personal observation of someone in the market), they will be popular.
- 8) Please note, since the time of the original peer review, the future of the existing dwelling on 42 Leith Road is uncertain. It may be removed from site and therefore a new dwelling will be constructed. The following mitigation is recommended to apply:
 - reflectivity and height controls on Lots 1 – 3 should apply to 42 Leith Road
 - methods to mitigate the combined effect via including vegetation (protection of existing or new areas) should also be reviewed. Vegetation around this dwelling may be appropriate but would need to be assessed in combination with what is being proposed around Lots 2 & 3.

Your sincerely



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