

Submission on the Supplementary Landscape Visual
Assessment by Michael Graham and the Master Land Use
Consent granted for the Kinloch Golf Course in 2003

Re Application by Seven Oaks Kinloch Limited for land use
consent (RM240388), subdivision consent (RM240389) and
variation to subdivision consent (RM200118B)

D Bruce Campbell, Kinloch Residential Ratepayer

20th September 2025

Dear Commissioner Sweetman

Thank you for the opportunity to evaluate and comment on the Supplementary Landscape Assessment (LVA) that you requested be completed at the recent hearing. Specifically, your request related to the effect of the proposed development on landscape and visual amenity when viewed from the Lochridge Estate development which is located further up the Whangamata Valley to the north of the application site.

To enable me to make comment on the new LVA, I have researched online both the process of Landscape Value Assessment and other information pertaining to both the Lochridge Estate and Seven Oaks Developments.

The relevant LVA resource I referred to is:

- Best Practice Note by the New Zealand Institute of Landscape Architects
- A summary explaining the Purpose of a Landscape Value Assessment

The following are my comments relating to Mr Graham's assessment, using his bullet points.

2. Descriptive Phase

I do not believe that Mr Graham has in any way captured the landscape and visual amenity of the views from Lochridge Estate Stage Two. I offer my own assessment as follows.

The Lochridge Estate Development Stage Two is in a unique location at the Northwest boundary of the Kinloch Community Structure Plan (KCSP) area. The land, known as Te Hui, is accessed off Whangamata Road.

The Estate is being developed in compliance with the KCSP/district plan lot densities and Stage Two blocks range in size from 1.6ha to 4.23ha. The building sites provide captivating views across Kinloch out across Lake Taupo's Whangamata Bay to the Karangahape Cliffs, and towards the mountains in the Tongariro National Park (a World Cultural Heritage Zone).

The views to Lake Taupo traverse the Seven Oaks Terraces (low density residential area), the application site (zoned as low density residential) and the Seven Oaks consented subdivision (zoned as residential).

The foreground view is framed by the two Significant Natural Areas (SNAs). The Okaia Scenic Reserve on the left is smaller in width and delineates the western developments

from the established Kinloch Village to the east. The Otaketake Scenic Reserve to the right, which is mature bush, provides a degree of 'wildness' and will remain undeveloped.

My photograph – already submitted – captures this majestic panorama **See Appendix 1**

3. Mr Graham has been selective in the position he chose to take his photographic perspective, which is at a lower level than my own photograph. **Please see Appendix 2 – my view location map** My view location is Lot 22 while Mr Graham's View Location is taken from Lot 12

4. Analysis of Effects on Visual Amenity

I refer to paragraph 4 of the Supplementary LVA evidence which recognizes that the majority of the subject area is zoned as Kinloch Low Density within the Taupō District Plan (TDP). This is correct. The Kinloch Development Area and the relevant district plan objectives, policies, rules and planning map boundaries for the Low Density Zone were established under the RMA process for a plan change in 2007.

The Kinloch Development Area boundary locations in the TDP were based at that time on the Kinloch Community Structure Plan's (KCSP) radial density pattern approach - transitioning in bands from higher densities nearer Lake Taupō (minimum 800m², average 1200m²) to low density (minimum 1Ha, average 1.5Ha) and then to rural lifestyle zone (minimum 2Ha, average 2.5Ha).

With these Kinloch Development Area boundaries being locked into the TDP, the residents of Kinloch no longer needed to fund submissions and expert evidence for Council Hearings and notified subdivision proposals on an ad-hoc basis. Residents were assured that they could have public confidence in the TDP provisions being upheld, and developers were advised that their compliant applications need no longer be notified. The integrity of the TDP was to remain intact.

See Appendix 3 – Kinloch Topography showing the site (red)

5. The photo montages require a great degree of imagination and, in my view, do not in any way fairly represent what the developed view will look like.

Another way to provide a perspective of how the development will look is to consider the density effects when viewed from Lochridge Estate.

Appendix 4 combines Seven Oaks Terraces and the proposed site lot densities, looking south

Clearly there is going to be a very significant difference in visual amenity between the applicant's proposed 83 lot site and a 16 lot site as zoned by the KCSP/DP

It is important to note the encroachment and visual impact of residential sized lots adjacent to the two SNA's.

6 – 9 These paragraphs of the Supplementary LVA evidence, make it clear that further landscape and visual assessment work became necessary for the non-complying subdivision proposed, because the residents of Kinloch identified that a mature shelterbelt was removed. This whole situation undermines public confidence in the TDP provisions being upheld in a consistent manner.

The 'birdseye' view shown as **Appendix 2** shows the shelter belt insitu.

10. Mr Graham is correct that there will be "an encroaching extension of residential development"

I am in complete disagreement that "it will integrate with its surroundings"

We only have one opinion from Mr Graham here, because the Council never commissioned an independent peer review of the original LVA by an expert landscape architect; nor any expert peer review of this supplementary LVA evidence. This is surprising given that the density of development proposed by Seven Oaks in this recognized Low Density Zone far exceeds what the TDP ever envisaged – this being a proposed 83 lot subdivision where the minimum lot size of 800m² is 9,200m² less than minimum lot size; and the average of 0.13Ha is 1.37Ha less than the TDP's average for Low Density Zone. There are significant reduced setbacks for buildings and garages equally never envisaged in this Low Density Zone.

An expert landscape architect's peer review should have been commissioned by Council, particularly to provide a more accurate comparison to what the Low Density Zone envisaged, i.e. up to 16 lots, (being 10 x 1.5Ha in Low Density, and 6 x 1000m² lots in Residential).

The surroundings are the two SNAs – the Okaia and Otaketake Scenic Reserves. These provide immense visual amenity to the views from Lochridge Estate. The proposed 83 lot residential development completely encroaches into the land area between the two reserves. This was never intended in the positioning of the transition line of the KCSP. The clear intention was to maintain the ‘natureness’ of the reserves and, in particular, protect the two fingers of the Okaia Reserve.

11. When viewed from Lochridge Estate the transition from Seven Oaks Terraces to the application site will be abrupt. There will be some 5 houses across 5 1ha lots adjacent to a 12 lot residential wall of housing of which up to half or more could be two-storey.

Paragraphs 11 – 12 of the supplementary LVA evidence describe screening from the Terraces Development, yet fail to recognize how the TDP boundaries in the Kinloch Development Area were identified on the basis of retaining the rural outlook from the Kinloch Valley floor within the then named ‘medium’ and ‘low density’ (now Low Density and Rural Lifestyle).

In determining the transition of higher to lower densities the KCSP also set out to address ecological and cultural values, impacts on trout spawning streams and their riparian margins, natural hazards, and Lake Taupō water quality. In particular, the KCSP states that: “The provision of lower density development will assist to mitigate the long-term effects of nitrogen input into Lake Taupo.”. Hence, the KCSP identified that the lower hill slopes surrounding the Kinloch Valley should be excluded from high-density type development. This led to the Low Density boundaries being set in the TDP where they are.

13. I disagree with Mr Graham that the level of adverse effects on visual and amenity values from Lochridge Estate are ‘very low’

Using the rating scale on Page 8 of the Best Practice Note by the New Zealand Institute of Landscape Architects, I rate the effects as **very high**.

14. As these developments typically include covenants on planting - restricting the height of any vegetation to under eaves height – coupled with the tendency to maximise building coverage on each lot, there will not be much greening in the proposed development.

15 Mr Graham refers to the findings of the overall report and conclusions presented in his Evidence in Chief. These essentially support a hybrid approach extending the General Residential Zone densities into the Low Density Zone and keeping some of the required setbacks for certain lots - based on his opinion that the density transition boundary has been set arbitrarily. Mr Graham seeks to use this non-complying subdivision consent for Seven Oaks as a mechanism to change the location of the Low Density Zone boundary; recommending from a purely landscape perspective that "... the most appropriate density transition line would occur at, or about the cadastral line that corresponds with the alignment of Kahikatea Drive site access and the Kinloch Golf Course / Bode Lane boundary to the east."

This approach is of significant concern to residents in Kinloch, as it undermines the integrity of the TDP, the certainty of zone boundaries being adhered to, and public confidence in the consistent administration of the TDP requirements for development in the Kinloch Development Area. No doubt if this non-complying subdivision is granted consent, there will be others to follow; and each one referring to how Council adopted a new boundary for density transition without even going through the rigorous plan change process required under the RMA for such a zone boundary change.

To Conclude:

I seek that this higher density subdivision proposal for Seven Oaks be declined in the first instance, that the integrity of the TDP be upheld, and that Council is not exposed to further applications ignoring the specific purpose and boundary locations for the respective density zones in the Kinloch Development Area. There is nothing exceptional about this application to warrant granting consent to such a non-complying activity.

Secondly, I seek that the Seven Oaks subdivision proposal be modified significantly and then re-submitted to Council - to achieve a more compliant development; given that it can comply with the GRZ provisions for a portion of the site, and develop a much lower density for the balance of the property – to be more in line with the TDP requirements for the Low Density Zone.

Should any change to the density transition boundaries ever be considered for the TDP, I seek that this be pursued through the correct procedures for plan changes to the TDP or any future regulatory plan for resource management purposes; and not by way of a non-complying resource consent application for such a high density development, that was never envisaged in the Low Density Zone for Kinloch.

To fully appreciate the truly amazing scenic landscape when viewed from Lochridge Estate, one needs to stand on the land, use one's eyes to perceive the most beautiful sight and feel the vibe.

Comments on the Kinloch Golf Course Consent

Referencing the Further Information Request and response for the application

25-06-23 Kinloch Water and Capacity

For the avoidance of doubt, TDC should be requested to reconfigure the table showing consented and identified future developments so as to confirm there is sufficient headroom for infrastructure capacity.

The Granted Consents (remaining connections) needs to be expanded to show exactly what areas have been allowed for – eg Kinloch Golf, Poplars Stage 2, Te Hui (Lochridge Estate), Seven Oaks Terraces, Waterview, and others.

Some clarification is required around the undeveloped land at Te Hui (Lochridge Estate) and Waterview, and whether they should be shown in the Potential Future Development column. **(See Appendix 5)**

Commissioner, thank you for your time

D Bruce Campbell

Kinloch Residential Ratepayer

20th September 2025





LOCHRIDGE ESTATE

KINLOCH | LAKE TAUPO

STAGE TWO



Boundary lines are indicative only

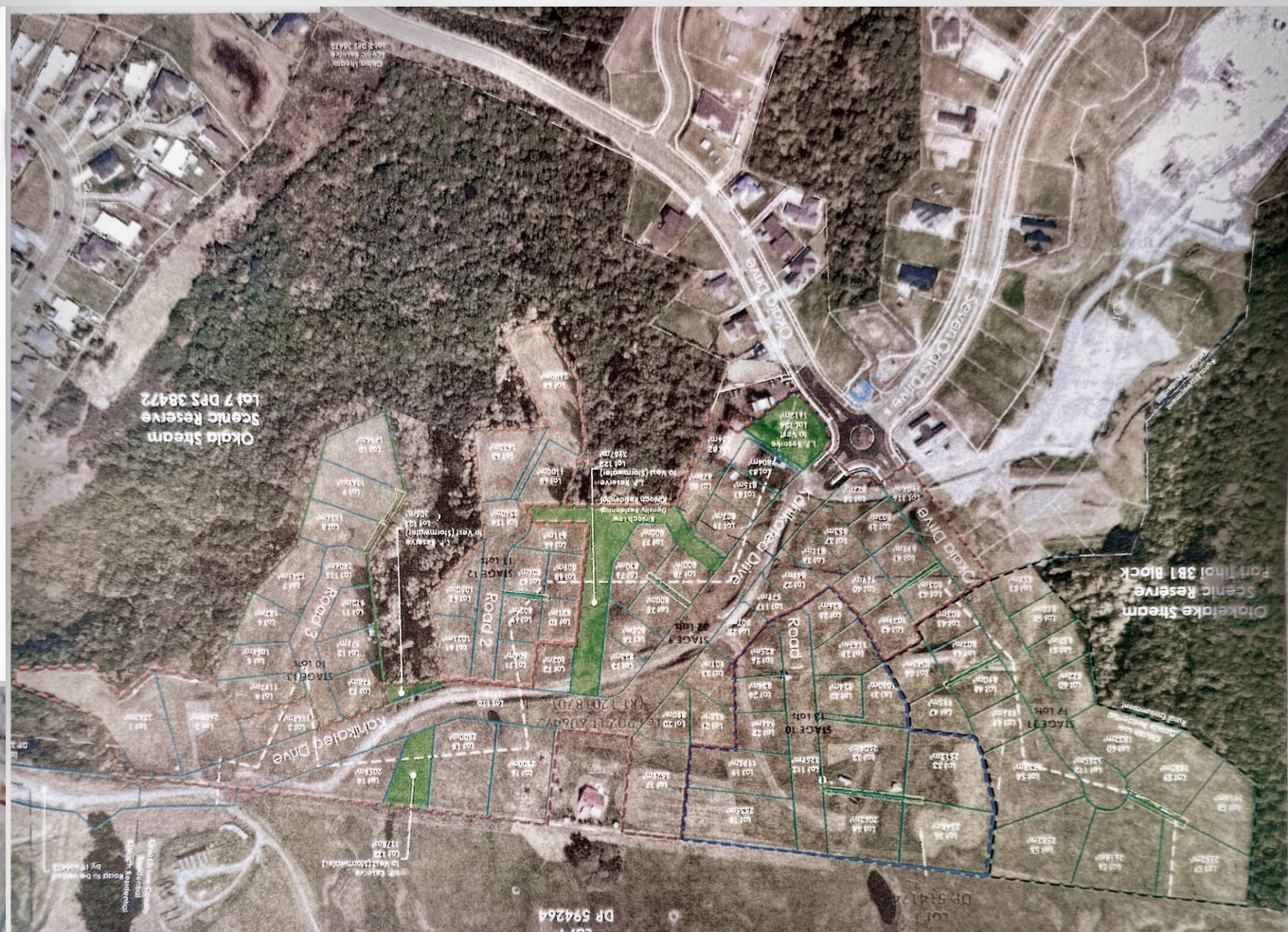
www.lochrIDGEestate.co.nz





LEGEND

- Stage
- Contours (5m)
- Major
- Minor
- Parcel



The table below takes the current connected properties (rates factor) and adds the connections expected from already consented developments and identified future developments.

	Wastewater	Water
Current connected + available Rates Factor	1454	1445
Granted Consents (remaining connections)	172	240
Potential Future Development	110	140
<i>Seven Oaks - Balance Land RM# 240389</i>	83	83
<i>Infill potential</i>	24	24
<i>Hunt Club</i>		30
<i>190 Kinloch Road (workshop)</i>	3	3
TOTAL	1736	1825

Wastewater

The total number of wastewaters connected lots expected at full development is 1,736, within the design capacity and the consented capacity of the Kinloch WWTP (1,810). The treatment plant has also been conservatively sized assuming there could be a change in occupancy in Kinloch overtime i.e. more permanent occupancy.

A capacity upgrade to the Kinloch WWTP is scheduled for 2025/26 and 2026/27 with a budget of \$1,725,000. The treated wastewater disposal system is a combination of drip irrigation within the golf course and treatment plant surrounds, and a rapid infiltration system adjacent to the treatment plant. There are no expansions of the disposal systems planned as the capacity currently provided is expected to meet future requirements.

Water

The total number of water connections in Kinloch is expected to be 1,825. In addition to Kinloch there are 76 properties on the Whakaroa rural water scheme that is supplied from Kinloch. The maximum potential water take from the Whakaroa area is 500 m³/day. There is no water supply growth planned in the Whakaroa area.

The Kinloch water system (network and plant) is being designed to deliver 5,000m³/day of treated water and there is more than this volume consented to take from the source if needed. Removing the maximum potential volume supplied to the Whakaroa scheme leaves 4,500m³/day for use in Kinloch. This equates to approximately 2.5m³/day of water use per property. To put this usage level in context, our target water per property across the district is 1.5m³/day. It is also worth noting that many of the remaining development areas in Kinloch are rural and will have restricted connections which allow a maximum flow of 1.7m³/day. The Kinloch water system upgrades have been conservatively sized.

There is currently 2,450m³ of storage between the Locheagles and Whakaroa Low (Boojum Dell) reservoirs. A new 2,000m³ reservoir is planned which will bring total storage to 4,450m³. This will provide the community with approximately 24 hours of storage during very high demand periods. There is additional storage on the Whakaroa scheme.

The volume of water required for firefighting in residential areas (FW2 classification) is 45m³ and for small commercial areas is 180m³ (FW3 classification). These requirements are clearly met by both the current and future planned reservoir storage volumes.