

29 June 2023



Louise Wood
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Taupō District Council
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Dear Louise,

Re: 36 Locheagles Rise, Kinloch - proposed dwelling – Landscape and Visual Effects Peer Review [Application #220069]

Introduction

1. Further to our correspondence, Boffa Miskell Limited ('**BML**') have undertaken a review of the Landscape Character Assessment ('**the assessment**') accompanying the resource consent application for the proposed dwelling at 36 Locheagles Rise, Kinloch. The assessment was prepared by Hudson Associates Landscape Architects (May 2022). The purpose of this review is to assess the landscape-related details within the application, with a particular focus on the potential landscape and visual effects of the proposal.
2. As part of this, the following documents have been reviewed:
 - *Landscape Character Assessment* ('the assessment'), prepared by Hudson Associates Landscape Architects, dated May 2022.
 - *Architecture plans*, prepared by Vertical Arts, dated 19 October 2021.
 - *Earthworks Plan*, prepared by Vertical Arts, dated 13 May 2022.
 - *Building Sections*, prepared by Vertical Arts, dated 13 May 2022.
 - *Overall Site Plan*, prepared by Vertical Arts, dated [unknown].
 - *Application for Resource Consent*, prepared by Cheal, dated March 2023.
3. The focus of this review is on the assessment, as this provides the most useful information in relation to the potential landscape and visual effects of the proposal. I possess a good understanding of Kinloch and have previously conducted peer reviews and assessments pertaining to landscape and visual effects in both Kinloch and the broader Taupō area. On April 4, 2023, a visit to the site and its surrounding environment was carried out.

Request for further information

4. After conducting the initial review of the application and completing the site visit, a formal request for additional information was issued to the applicant team (April 2023). This request sought further details regarding the following aspects:
 - Landscape Planting Plan – Additional information was requested regarding the proposed landscape planting, as the assessment appeared to rely on this planting to mitigate visual and landscape effects and the application lacked sufficient detail of this or a planting plan. The purpose of this request was to gain a better understanding of how the proposed planting will function and the timeline for achieving the desired outcomes as stated in the landscape assessment and Assessment of Environmental Effects (AEE).
 - Visual Simulations - The visual simulations or montages submitted with the initial application were small and had low resolution. Consequently, it was requested that these be resubmitted at a higher resolution and larger scale. Additionally, clarification was sought regarding the methodology used in creating the visual simulations as the simulations did not meet the requires of the NZILA best practice guide¹. This included information on the viewing distance, viewpoint locations, reading distance, and the stage of vegetation growth depicted in the simulations, among other relevant details.
5. A response to these RFI matters was provided on 13 June 2023, with further commentary provided below. No planting plan has been provided as part of the assessment; this matter is addressed further below.

PEER REVIEW

6. The Landscape Character Assessment report is set out under the following headings. For consistency I shall address each section in turn.

Methodology

7. The report outlines the methodology employed during its preparation and acknowledges its alignment with the *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines [Final Draft subject to final editing, graphic design, approved by Tuia Pito Ora on May 5, 2021]*. It should be noted that this version of the guidelines was in the draft stage at the time of writing this assessment and has since been updated [July 2022]. However, the correct version referenced is the one applicable during the assessment's composition. Site visit summaries, information sources and other relevant information is provided.
8. Although I acknowledge that visual simulations do not “real life views”, – they are, however, very useful tools to assist in the assessment and decision-making processes whereby better informed and more transparent judgments on appearance and effects can be made. However, the visual simulations accompanying the application do not adhere to

¹ Best Practice Guide Visual Simulations BPG 10.2, NZILA Education Foundation, 2010

best practice methodology². Important factors such as viewing distance, the human field of view, viewpoint location, lens focal length, and overall methodology remain unclear. As a result, the accuracy and clarity of these simulations raise doubts. Additionally, the simulation suggests planting at a stage of "5 years growth," yet the lack of plans and information concerning this makes it difficult to determine the scope of proposed planting within this application.

Proposal

9. The proposal is accompanied by drawings prepared by Vertical Arts, which offer a good understanding of the project. However, the application lacked a landscape plan, and this omission also continued in the RFI response. The inclusion of a landscape plan would have been beneficial as it (and in particular, 'proposed planting') was referenced numerous times in the assessment, furthermore the visual simulations were prepared showing this planting. The 'proposed planting' holds importance in the overall application to assist with integrating the dwelling into the landscape and is a key outcome of the proposal. Recognising this, the provision of a landscape plan would have enhanced the comprehensiveness of the application.
10. The proposal is a discretionary activity under the Taupō District Plan (TDP), with the project exceeding the consent notice limits on the property for the maximum building coverage, maximum building height and maximum earthworks.
11. In summary the proposal consists of:
 - A proposed dwelling with a floor area of 1,456m² on a 1.14ha section. This results in 18.6% building coverage, where the consent notice allows 5% building coverage (570.6m²)
 - According to the consent notice, the maximum building height is determined by the more restrictive measurement between 7.5m and the reduced level of the upper limit of the building envelope, which is 528.5m. However, the proposed tower exceeds both these limits by 2.15m and 5.24m, respectively, as the building is set down into the site. Much of the main dwelling adheres to both height limits, except for the apex of the roofs and two chimneys, which exceed the limits by up to 2.5m. Additionally, the boathouse situated south of the tower surpasses the RL of 528.5 by a maximum of 3.8m.
 - As per the consent notice, a 10m setback from all boundaries is permitted. However, the proposal includes a gatehouse positioned 2m from the northern boundary, resulting in an infringement of 8m from the required setback.
 - Earthworks will be required over approximately 60% of the site (0.68ha) of the total area. Earthworks will include 8,679m³ of cut and 1,903m³ of fill. The consent notice allows for 10% site disturbance at one time.
 - Regarding the land use consent, Performance Standard 4a.1.13 permits a 1.5m cut/fill beyond the 10m building setback. However, the proposed maximum cut is 7m, which exceeds the permitted limit by 5.5m. On the other hand, the maximum fill is 1.5m, which complies with the standard.

² Best Practice Guide Visual Simulations BPG 10.2, NZILA Education Foundation, 2010

- Furthermore, Performance Standard 4a.1.14 allows for a 0.5m cut/fill within the 10m building setback. In this case, the proposed maximum cut is 4.29m, which exceeds the permitted limit by 3.8m. Additionally, the maximum fill is 6m, exceeding the permitted limit by 5.5m.
- The dwelling will be constructed of recessive colours and materials including stone and timber, a requirement of the consent notice.

Relevant Statutory Provisions

12. The assessment provides a comprehensive summary of the relevant statutory provisions / framework for the assessment of the proposal. It includes references to:

- The Resource Management Act (**RMA**), particularly sections 6(b), 7(c) and 7(f).
- The Waikato Regional Policy Statement (**WRPA**), including
 - Lake Taupō as an identified Outstanding Natural Feature and Landscape (**ONFL**)
 - Section 12B – Landscapes
 - Relevant objectives and policies, included in Appendix 3 of the assessment.
- The TDP, including addressing the following landscape overlays:
 - Outstanding Landscape Area (**OLA**) - *Whakaroa Peninsula* (OLA65), located to the east of the site.
 - Amenity Landscape Area (**ALA**) – *Whakaroa Hills* (ALA66), the application site is located directly within this overlay.
 - Significant Natural Area (**SNA**) – *Whakaipo Bay Scenic Reserve* (SNA309) located directly adjacent the site.

13. I am not aware of any additional statutory matters that should have been addressed.

14. The assessment references the consent notice on the property including the restrictions as they relate to the site. However, the assessment lacks reference to the Locheagles masterplan consent (granted in 2003), which encompasses the overall direction and layout of the development, including provisions regarding bulk and location, as well as a summary of basic landscape principles. Considering that the current application site is a part of the masterplan, having this information would have been valuable for background understanding, particularly in relation to the subsequent RM130119 decision.

15. Fortunately, Cheal's response as part of the request for further information has provided insight into the principal landscape considerations taken into account during the decision-making process. This response has been beneficial in filling this gap and enhancing the understanding of the application.

16. In addition, I have reviewed the information from the 2003 resource consent application, specifically focusing on the area known as 'Upper Locheagles.' This information provides valuable insights into the design intentions and potential of this particular area and the area relevant to this application. The key summary of this area is as follows:

- This region comprises moderately sloping elevated land that is adjacent to a DOC reserve and extends up to the western boundary of the site. Due to its elevation, this

land is visible from more distant locations. The potential for this area includes low-density housing integrated within a robust framework of trees and native vegetation.

- The development of the upper lands requires greater sensitivity. While there is a desire to develop these lands for high-quality housing, it is crucial to strike a balance considering the more delicate environment in which they are situated.
- Additionally, several design and development controls were introduced to align with the general intent of the application. These controls encompass various aspects, such as residential density, building patterns, location, height, design and form, accessory buildings, fencing walls, earthworks, and re-vegetation and amenity planting. It is understood that these elements were incorporated into the consent notice for the Locheagles subdivision.

Existing Environment / Landscape

17. The existing landscape section of the report describes the site and the surrounding landscape context at both a broader context and more localised scale. It refers to the wider character of the Taupō landscape as well as providing a comprehensive description of Kinloch and the subject site. This section is also usefully supported by accompanying photographs. However, no viewpoint location map was provided with the assessment, so it was difficult to determine where the photos were taken from. A viewpoint location plan would have been beneficial to further aid this understanding.

Viewing Audience

18. As per Te Tangi a te Manu, the typical approach for evaluating the visual effects of a proposal involves several steps: identifying the "visual catchment" (areas from where it will be visible), determining the "audiences" (people who will see it), and describing the effects on landscape values from specific viewpoints (representative public views or affected private properties). A landscape and visual assessment should ideally assess the nature and degree of the effects from each viewpoint and assign them a rating on the 7-point scale³.
19. However, in the assessment, there is a lack of clarity regarding the visual catchment and audiences for the proposed project. While references are made to visual effects in several sections within the assessment (paragraphs 77-80 and 97-97), it is challenging to follow and determine which viewing audiences are being evaluated. It would have been beneficial if the assessment had clearly defined the visual catchment and viewing audiences, and then assessed the visual effects of the proposal while providing an effects rating based on the 7-point scale as outlined in Te Tangi a te Manu.

ASSESSMENT OF EFFECTS

20. The assessment examines the landscape character effects, considering both the broader context and the local area. Visual effects are addressed within these sections as a subset, which is generally in line with the requirements outlined in Te Tangi a te Manu.

³ Refer paragraphs 6.26 and 6.27 of Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora NZILA [July 2022]

However, there is a lack of individual assessment ratings specifically addressing the viewing audiences within the surrounding area. Only an overall effects rating is provided, for the broader scale and local context landscape character effects, which adds to the confusions when trying to determine the effects of the proposal.

21. To provide clarity, this peer review follows the structure of the assessment and I address each of the sections in turn.

Landscape Character Effects – Broader Scale

22. The assessment concludes that there will be very low landscape character effects on the broader context. The reasons for this are identified as:
- The presence of existing modifications within the area (landcover modification, residential development, including some existing large dwellings).
 - The application site has been subdivided and it is anticipated that a house would be built on this section.
 - The proposed materiality, and modulation of the building will assist with the proposed 'blending' in with the wider context.
 - The proposal will be aligned with the landscape patterns being residential and will not disrupt the wider rural or ecological landscape patterns.
 - The dwelling will be integrated with the 'extensive planting' proposed as part of the application and complement revegetation patterns that already occur within the wider area, particularly the vegetated backdrop of the site.
 - The dwelling is located at a higher vantage point than other dwellings and is more visible.
 - The dominant backdrop of Whakaroa Hill assist with mitigating the height of the proposal.
 - The proposed dwelling will result in a small increase in residential lighting in the broader context.
23. While I recognise that the reasons mentioned above contribute to the integration of the proposal within the broader context, it is important to note the nature and degree to which the proposal is inconsistent with that context. The building exceeds the permitted footprint and height as stipulated in the consent notice. Although the surrounding area includes larger residential buildings, the proposed development is approximately triple the footprint size of some of the neighbouring residential dwellings on Locheagles Drive⁴.
24. As a result, the proposed dwelling will be significantly larger and visually prominent, visible within the broader context. It will be visible from prominent locations like the Lake Taupō foreshore and the broader Kinloch residential area. The elevated position of the land allows for visibility from more distant area, although I acknowledge that the distance of these views somewhat reduces the level of effects. Moreover, the proposed building design incorporates modulation and the use of recessive materials, which does contribute to mitigating these effects to some extent.

⁴ The proposed development has a footprint of 1,456m² and surrounding properties have a footprint of Locheagles Drive (approximately 400m²), 30 Locheagles Drive (approximately 500m²) and 35 Locheagles Drive (approximately 555m²)

Landscape Character Effects – Local Scale

25. Considering physical, associative, and perceptual attributes the assessment concludes that there will be low landscape character effects on the localised area. The reasons for this are identified as.
- There is a dwelling anticipated on the property.
 - The height and backdrop of Whakarua Hill mitigates the height of the proposal from surrounding viewing locations.
 - The modulated façade and material assist with breaking up the appearance of the building and giving the illusion of multiple smaller dwellings
 - The integration of the building into the landform through earthworks / cut and fill
 - The proposed dwelling will result in a small increase in residential lighting in the local context.
26. Although I acknowledge that the reasons mentioned earlier contribute to the integration of the proposal within the local context, I provide the additional landscape and visual commentary on the proposal.
27. Although various architectural techniques have been employed to mitigate the scale of the building, such as dividing it into multiple elements and utilising materials like stone and timber, it is important to note that the resulting effect is that of a cluster of buildings resembling a small village. This design approach deviates from the typical character of the surrounding area. Moreover, the proposed building significantly surpasses the size of neighbouring structures, and elements like the tower/turret structure situated in the upper part of the site lack sensitivity and specificity to the location, ultimately exacerbating the building's scale and prominence. The architectural style of the proposed dwelling does not align cohesively with the existing design context, creating visual discordance and a lack of harmony with the wider surroundings. Given its design and location within an Amenity Landscape Area and adjacent to an ONL, the proposed building will stand out prominently in views where the landscape context is recognised as an important hill and ridge backdrop and part of a framing view.
28. As stated in the initial resource consent application and considering the site's proximity to the ONL and its location within the ALA, the development of the upper part of Locheagles necessitates heightened sensitivity. Although there is a strong inclination to develop these lands for high-quality housing, it is imperative to find a balance that considers the sensitive landscape in which they are situated. It is not considered that the proposal in its current forms achieves this.
29. The assessment lacks a comprehensive evaluation of the proposed earthworks from a landscape effects perspective. While it recognises that the site has already been modified through the creation of the existing building platform and subdivision works, a thorough assessment of the quantity and extent of the earthworks, particularly in terms of short-term effects, would have been valuable. The proposed earthworks are significant, necessitating earthworks covering over 60% of the site (while only 10% is permitted) and involving cuts of up to 7m, exceeding the permitted limit by 1.5m. Overall, it is anticipated that there will be notable alterations to the unfinished contour of the landform, resulting in moderate to high effects. It is important to note that the earthworks are necessary for siting the building within the landform and that the moderate to high effects will be largely

temporary during the construction phase. It is expected that the overall landform, including high points, will be maintained, minimising long-term effects. On completion of the development the visible earthworks will largely be associated with the retaining wall and building platform this is considered to result in low (adverse) effects.

30. The assessment lacks a visual evaluation regarding the impact on the private residential properties in the immediate vicinity of the site, including the wider residential area of Kinloch. However, it is stated in the Assessment of Environmental Effects (AEE) that written approval has been obtained from the neighbouring properties at Locheagles Drive, suggesting that concerns regarding dominance or visual effects on these properties can be disregarded. Nevertheless, it would have been beneficial for the assessment to include commentary addressing this aspect.

Planting

31. Proposed planting has been relied upon numerous times throughout the assessment to mitigate the effects of the proposed development, both at a broader and local context. This includes statements such as 'The size of the dwelling, while larger than others in the area, will blend in with the broader context due to its fragmented form, natural materials, modulated facades and its integration with the landscape and proposed planting' [para 75]. Throughout the assessment the proposed planting is cited as assisting to; integrate the proposal into landscape patterns and existing backdrop, ensure the proposal is in keeping with the character of the wider area [para 89], mitigate the effects of the stone walls [para 93], provide existing scenic value for the area, and assist with mitigating adverse effects of the ALA Whakarua Hills overlay [paragraph 106]. In addition to this the visual simulations have been prepared showing planting at an indicative 5-year growth.
32. As part of the further information request, additional information was requested in relation to this planting, including a high-level concept plan and further description. The applicant responded to this request stating that whilst planting is mentioned as helping to mitigate effects, the assessment does not rely on planting in reaching its conclusions, but then goes on to state that the proposal includes several mitigation measures to reduce the potential effects, these include modulation, recessive material, siting the dwelling in response to topography and proposed planting. From this reply it is difficult to determine the level and extent planting has been relied upon as these two statements directly contradict one another.
33. The RFI response indicates that the proposed planting will follow an English country garden style, featuring ornamental trees and shrubs. However, I am of the opinion that this choice of planting style is not considered to be in harmony with the wider landscape patterns, will not achieve any of the outcomes identified in the assessment (and paragraph 27 above) and it does not address any visual mitigation aspects of the proposal.
34. In my opinion, planting plays a significant role in this proposal and is equally as important as the other mitigation measures such as building facades, materiality, and the location of the development. The proposed development is notably larger in scale and height than what is typically anticipated in the zone. Properly planned and executed, planting has the potential to break down the perceived scale of the building and facilitate its integration into

the surrounding environment and landscape. Furthermore, it can help achieve several relevant objectives and policies outlined in the TDP, including the maintenance and enhancement of amenity, ensuring the proposal aligns with the attributes of the identified Amenity Landscape Area, and mitigating adverse landscape and visual effects of the proposal.

35. In summary, considering the significant reliance placed on the proposed planting as part of the visual assessment, and the absence of a comprehensive approach to the planting scheme, I believe that the landscape and visual effects of the proposal have the potential to be higher if this aspect is not adequately addressed.

Recommendations / Conditions of Consent

36. Based on my review of the Assessment and from the discussions above, I consider that a planting plan is necessary. I firmly believe that a comprehensive mitigation planting plan should be prepared as an integral part of the application assessment to effectively mitigate the anticipated level of effects, as outlined in the assessment. Without the inclusion of planting measures, I hold the opinion that there will be a range of effects for this proposal and that these will be up to moderate (adverse).

37. This planting plan should, at a minimum, aim to achieve the following outcomes:
- Mitigate the visual effects of the proposed retaining: The planting plan should incorporate vegetation that helps to visually soften and integrate the retaining structures within the landscape.
 - Break up the bulk and sprawl of the building through the introduction of tree species: The planting plan should include strategically placed trees that effectively reduce the perceived scale and mass of the building, creating a more harmonious and visually appealing composition.
 - Provide comprehensive planting around the building: The planting plan should encompass a well-designed and cohesive planting scheme that encircles the building, integrating it into the wider landscape patterns and enhancing its visual integration within the surroundings.

The planting plan should be prepared by a qualified landscape architect or an expert in the field and be submitted for approval to the consent authority before the commencement of any construction activities. The plan should include details of the proposed vegetation, including the selection of appropriate tree species, their locations, spacing, and any necessary maintenance requirements. The planting plan shall be implemented and maintained in accordance with the approved design.

38. An option could be to include the planting plan as a condition of consent. This will ensure that appropriate measures are taken to address the landscape and visual impacts of the proposed development.

Conclusions

39. In conclusion, the proposed building exceeds the typical footprint by three times that of other buildings in the Locheagles subdivision area and the anticipated area within the zone. Additionally, the building surpasses the height limit in various locations.

Furthermore, elements such as the tower/turret structure situated in the upper part of the site lack sensitivity and specificity to the location, in my opinion further accentuating the scale and prominence of the building, deviating from the typical character of the surrounding area.

40. However, certain aspects, including the modulation of the building facades, the use of recessive materials and colours (such as stone and timber), and the strategic placement of the dwelling in response to the landscape's topography both on site and in the wider relationship to Whakaroa Hill, contribute to some extent in mitigating the proposed bulk and mass of the building. Nonetheless, it is believed that incorporating a comprehensive planting plan, including areas of native vegetation and substantial tree species, will further integrate the proposed building into the landscape, visually enhancing the area's character and establishing a connection with the broader surroundings.
41. To ensure that the landscape and visual effects of the proposal align with those identified in the assessment to a low, very low effects level, as a minimum it is recommended that a planting plan be developed and included as a condition of consent. This plan should outline species outcomes as described in paragraph 34. Without the inclusion of this planting plan, and considering the current design of the proposal, I am of the opinion that effects will be low to moderate.
42. I trust that the above technical review provides you with enough information to enable you to complete your planning recommendation report in response to the application. Please let me know if you require any further clarification.

Julia Wick
Principal Landscape Architect
BOFFA MISKELL LTD

Method Statement

22 June 2023

This peer review has been guided by the methodology outlined in '*Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*' by Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022. The following details are provided specifically regarding the effects ratings utilised in this peer review.

The Nature of Effect

The nature of effect assesses the outcome of the proposal within the landscape. It is evaluated based on whether effects are positive (beneficial), negative (adverse), or neutral (benign) within the specific context within which they occur.

It is important to note that a change in landscape or the view of a landscape does not automatically imply an adverse effect. Landscapes are dynamic and undergo natural as well as human-induced changes, ranging from subtle shifts to more noticeable transformations.

When assessing and managing landscape change, the key focus is to avoid or sufficiently mitigate adverse effects. The objective is to maintain or enhance the environment through appropriate design outcomes, while acknowledging that the nature and magnitude of effects may evolve over time.

The Level of Effect

Where the nature of effect is assessed as '**adverse**', the assessment quantifies the level (degree or magnitude) of adverse effect. Assessing the level of effect entails professional judgement based on expertise and experience provided with explanations and reasons. The identified level of adverse natural character, landscape and visual effects adopts a universal seven-point scale from **very low** to **very high** consistent with Te Tangi a te Manu Guidelines and reproduced below.



Landscape Effects

A landscape effect relates to the change on a landscape's character and its inherent values and in the context of what change can be anticipated in that landscape in relation to relevant zoning and policy. The level of effect is influenced by the size or spatial scale, geographical extent, duration and reversibility of landscape change on the characteristics and values within the specific context in which they occur.

Visual Effects

Visual effects are a subset of landscape effects. They are consequence of changes to landscape values as experienced in views. To assess where visual effects of the proposal may occur requires an identification of the area from where the proposal may be visible from, and the specific viewing audience(s) affected. Visual effects are assessed with respect to landscape character and values. This can be influenced by several factors such as distance, orientation of the view, duration, extent of view occupied, screening and backdrop, as well as the potential change that could be anticipated in the view as a result of zone / policy provisions of relevant statutory plans.

The Significance of Effects

Decision makers assessing resource consent applications must evaluate if the effect on individuals or the environment is less than minor⁵ or if an adverse effect on the environment is no more than minor⁶. For non-complying activities, consent can only be granted if the s104D 'gateway test' is satisfied, ensuring adverse effects are minor or align with planning objectives. In these situations, the assessment may be required to translate the level of effect in terms of RMA terminology.

This peer review has adopted the following scale applied to relevant RMA circumstances⁷ (refer to diagram below), acknowledging low and very low adverse effects generally equate to 'less than minor' and high / very high effects generally equate to significant⁸.



⁵ RMA, Section 95E

⁶ RMA, Section 95E

⁷ Seven-point level of effect scale. Source: Te tangi a te Manu, Pg. 15

⁸ The term 'significant adverse effects' applies to specific RMA situations, including the consideration of alternatives for Notices of Requirement and AEEs, as well as assessing natural character effects under the NZ Coastal Policy Statement.