

Technical Memorandum – Fast-track Application

Waikanae North Development Limited Urban Subdivision Development

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Issued to: Monique Leith, Consultant Planner for Kāpiti Coast District Council

Introduction

This memorandum responds to a request for comment from the expert panel assessing Waikanae North Development Limited's ("WNDL") substantive application to undertake an urban subdivision development at 169-171 Peka Peka Road, Kāpiti, under the Fast-track Approvals Act 2024 (the Act).

This memorandum provides comments on the effects of the project on landscape and visual amenity matters in relation to the district council consents being applied for. A landscape and visual effects assessment has been prepared for the proposed development by Local Landscape Architects Ltd. This memorandum provides a peer review of this assessment in line with best practice outlined in Te Tangi a Te Manu.¹

Pre-lodgement feedback on the draft application

Boffa Miskell Limited (BML) was previously engaged by KCDC to provide pre-lodgement advice on the draft application as provided to KCDC for review. This advice was supplied in a memorandum dated 27 January 2026, a copy of which is attached to this memo as per the Panel's request within Minute 1.

This pre-lodgement review found that the applicant's Landscape and Visual Assessment (LVA) was generally consistent with current best practice and its conclusions were broadly reasonable. However, the review identified several important gaps, including the absence of a robust assessment of natural character within the coastal environment, inconsistencies in supporting visual material, and insufficient evidence to demonstrate the scale of effects on sensitive dune landforms and adjoining rural properties.

¹ *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022, pp160-163

The review concluded that potential adverse effects may be underestimated, particularly in relation to rural interfaces, large-scale earthworks, and the visibility of development on dune landforms. Proposed mitigation measures appeared to rely heavily on secondary controls such as planting, building height, and colour restrictions, rather than fundamental design responses, and were not demonstrated to be effective. Additional information was therefore recommended to support the application, including cross sections, visual simulations, and more detailed mitigation strategies, along with design refinements to reduce density at rural boundaries and strengthen the transition between urban and rural environments.

A meeting was held between WNDL and the reviewers (for Council) on 28 November 2025 to discuss these matters, along with Urban Design matters. A further response was provided by the Applicant 12 December 2025, noting that further matters still to be addressed included:

- Further detail/evidence on how proposed lots within the western dunes will manage the slope conditions
- East-west long cross-sections through the entire western dune area
- Further cross sections required to understand the scale of potential landscape effects on the dune landforms.

The pre-lodgement review concluded that further information is to be provided to appropriately demonstrate and understand the full extent of potential landscape and visual effects.

Post-lodgement work with the applicant

A further meeting was held with WNDL on 9 July 2026 to discuss matters raised in the draft of this peer review (dated 2 July 2026). During this meeting WNDL provided further understanding as to their landscape strategy in relation to the surrounding lots and the approach to earthworks and retaining. It was agreed that the locations of further cross sections are to be provided. This material, along with an explanatory memorandum, was provided to KCDC on 15 July 2026, and this further information provided has been taken into consideration in the response below.

Review of application (and regulatory assessment)

Approach of Peer Review

This peer review responds to the following questions in relation to the LVA, and has been carried out in line with the methodology described for undertaking peer reviews in Te Tangi a Te Manu at pages 160-163²

Where independent assessment has been undertaken within this review, it has been undertaken in line with Te Tangi a Te Manu and in line with the attached method statement. This peer review also considers the extent to which the updated Local Landscape Architecture Landscape and Visual Assessment (LVA, Revision 1.6, March 2026, and referred to as 'the Assessment' in this review) has addressed the matters raised in the BML

² *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022, pp160-163*

peer review of January 2026 and identifies key amendments to the assessment relative to Revision 1.2 (October 2025).

Methodology

Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines³ is the best practice guidance for carrying out landscape assessments in New Zealand.

The methodology is outlined in Section 3 of the Applicant's Landscape and Visual assessment and generally reflects accepted NZILA / Te Tangi a te Manu practice. It adopts the seven-point scale and separates landscape and visual effects, consistent with best practice. The Assessment has used a combination of desktop review, site visits and drone photography to inform the assessment findings.

The January 2026 review considered that the single long cross section through the western dune area was helpful but insufficient to interrogate the scale and extent of landform effects. The review recommended a series of detailed cross sections through different parts of the dune landform to demonstrate the relationship between proposed dwellings, earthworks and the existing landscape.

Following discussion with WNDL at the 9 July 2026 meeting, Local Landscape Architecture has provided a response dated 15 July 2026 which includes the additional cross sections requested. These include further sections through the dune landforms as well as sections through boundary interfaces and steeper sites.

Viewpoint photographs have been updated to reflect NZILA's Visual Simulations Best Practice Guide 10.1 and are presented at a consistent size. The Local Landscape Architecture response dated 15 July 2026 confirms that all lodged viewpoint photographs were taken with a 50 mm lens and presented as single photographs with the approximate site extent indicated. It also confirms the horizontal field of view as 26.6 degrees and the vertical field of view as 17.8 degrees. No site features are labelled in the views, leaving the reader to have to interpret themselves what part of the site is being viewed.

Existing Environment

The description is comprehensive across scales, covering wider (Section 5.1), local (5.2) and site context (5.3), and clearly identifies key features such as dunes, wetlands and rural land uses.

Landscape values are reasonably well articulated, including natural character, landform, vegetation and associative values (Section 5.4).

The Assessment has been updated to recognise that there is variation in natural character across the site, distinguishing between modified pasture and higher-value wetlands and dune systems (Sections 5.3–5.4; 9.1). It was a recommendation of the January 2025 review that this information be included as the site lies within the Coastal Environment.

³ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

Tangata whenua associations are acknowledged but not developed in depth beyond a high-level statement (Section 5.4).

The site analysis in Section 6 of the report cross refers to Section 2 of the Waikanae North Masterplan Design Report. This has also been reviewed as part of this peer review. Specific cross references to this report within the assessment would further assist the reader with understanding the key landscape elements within the site as they have been considered in this Landscape and Visual Assessment.

Project Description

The project is clearly described in terms of scale, layout, access, densities and controls (Section 4.0).

Key design controls such as building height limits, LRV restrictions and landscape treatments are clearly explained and linked to effects management (Section 4.0 and Section 10.0).

Illustrative material is referenced (figures, appendices, viewpoints), and the inclusion of a concept plan and viewpoint photography supports understanding. Inclusion of drone photography has been used to illustrate site context and boundaries in relation to adjacent private dwellings.

The development layout and design is not detailed within the Assessment, however is cross-referenced to being described in Section 3 of the Waikanae North Masterplan and Design Report. As noted above, specific cross references to this report within the Assessment would further assist the reader with understanding how the Assessment has informed the masterplan design. There are only three brief references to the Assessment within the Masterplan Design Report and three brief references to the Assessment within the Urban Design Assessment, so there is minimal discussion as to how the findings of the Assessment have been used to inform the masterplan. Likewise, there are only three references to the masterplan report and no references to the Urban Design assessment in the Assessment.

Statutory Planning matters

All relevant statutory documents are identified and have been addressed to some degree (Section 7.0).

There is detailed coverage of RMA Part 2, NZCPS, NPS-UD, RPS, NRP and District Plan provisions (Sections 7.1–7.6).

The Assessment correctly distinguishes between framing the landscape assessment and undertaking a full planning assessment (Section 7.0).

It is noted that the site lies within the mapped coastal environment of the Kāpiti Coast District Plan and “*expresses strong coastal character on its western edge with its dunes and wetlands, which will be protected from inappropriate development with no modification to Te Harakeke Swamp, limited works affecting Peka Peka Road Swamp, and limited modification*

of the most prominent dune ridges.”⁴ A Special Amenity Landscape (SAL19 Ngarara Dunes) extends over the western extent of the site.

The Assessment is clear that the proposed development is not intended to meet the requirements of the Rural Zone, and that the proposed development will be residential in nature. It assesses the project against the land use controls from the District Plan’s *General Residential Zone* and *Local Centre Zone* provisions. The Assessment notes that “As such, the framing of landscape and visual effects against statutory provisions considers both the rural zone provisions (particularly when considering the interface of the project with adjoining properties) but also those of the residential zone, acknowledging that the development will have a residential character and will ultimately assume a future zoning of *General Residential*.”⁵

The Assessment proposes some controls to manage interfaces with adjacent zoning and SAL values (see further discussion in relation to Mitigation Measures below).

The District Plan notes that “*The Rural Zones of the Kāpiti Coast encompass a wide range of landform types, landscapes, land uses and activities. These range from horticulture on the plains in and around Ōtaki, to pastoral farming on the dune country and foothills of the Tararua Ranges. The Rural Zones are of considerable value to the residents of the District. The farmers, horticulturists, rural service industries, and businesses and future generations of people who seek employment in rural industries depend on the sustainable management of the resources found in these zones. The landscape character and amenity of the Rural Zones are major determinants of the overall visual character of the District.*”

The Rural Dunes Precinct which overlays the majority of the site (around ¾ of the area to the north as illustrated on the Landblink Precinct Overlay Plan 2911_ALL-P-109) requires development “*to be carried out in a manner that retains the sensitive landscape and ecological character of the area, including wetlands*” and that the “*overall density of development should be very low to retain the areas sense of openness. The natural character of the zone can be adversely affected by the presence of highly visible development and changes to dune landforms which cause disturbance to the natural contours and any significant cultural and ecological features of the area.*”

The Waikanae North Rural Eco Hamlet Precinct (which comprises the southern approximately ¼ of the site):

comprises the land adjacent to identified urban growth areas at Waikanae North and Ōtaki (which include consolidated sand dunes, interdune sandplains and wetlands) and shares similar physical characteristics with the Rural Dunes Precinct.

...the intention is to provide a buffer or transition between the proposed urban area and the Rural Zones.

Development should entail minimal disturbance to the natural contours and any significant cultural and ecological features of the area. While some development is anticipated to be

⁴ Waikanae North Landscape and Visual Assessment, March 2026, p15

⁵ Ibid, p.29

*clustered, the overall density of development should be relatively low so as to retain the area's sense of openness.*⁶

It is acknowledged in the Applicant's assessment that the development will not meet the requirements of the Rural Dunes Precinct nor the Waikanae North Rural Eco Hamlet Precinct. The Assessment notes that measures have been adopted from these Precincts such as avoiding wetland areas and revegetation to enhance dune and wetland areas.

The Rural Dunes Precinct and the Waikanae North Rural Eco-Hamlet Precinct serve complementary but distinct roles in managing the edge between urban and rural environments. Together they create a graduated transition rather than an abrupt boundary between urban development and the open rural landscape.

The Rural Dunes Precinct is intended to maintain the predominantly rural and natural character of the dune landscape. It contains consolidated dunes, interdune plains and wetlands that are environmentally sensitive and unsuitable for intensive agricultural use. The District Plan emphasises retaining ecological and landscape values, protecting natural landforms, maintaining very low development density, and preserving a strong sense of openness. Development is carefully managed, with clustering only permitted where it reduces visual impacts and avoids disturbance of dune ridges and wetlands.

In contrast, the Rural Eco-Hamlet Precinct, including the Waikanae North Eco-Hamlet, is specifically located adjacent to identified urban growth areas and is expressly intended to function as a buffer or transition between the proposed urban area and the Rural Zones. The precinct therefore allows a form of development that is more intensive than the Rural Dunes Precinct, but significantly less intensive than urban residential development.

The need for this transition arises from several planning objectives and policies within the District Plan:

- To maintain a consolidated urban form and direct growth into identified urban growth areas rather than allowing dispersed rural lifestyle development (DO-O3, GRUZ-P7).
- To provide well-managed interfaces between living, working and rural areas, minimising land-use conflicts and reverse sensitivity effects (DO-O11).
- To retain the District's valued rural character, including openness, natural landforms and the visual separation between settlements (GRUZ-P2, P7, P10, P11).
- To protect sensitive coastal dune systems, wetlands and ecological corridors while still accommodating housing growth (DO-O4, GRUZ-P10, P11).

The Eco-Hamlet precinct softens the urban edge through low-density clustered development and ecological restoration, while the Rural Dunes precinct preserves the open, predominantly undeveloped dune landscape beyond. This approach helps protect rural character, ecological values and productive rural land while accommodating growth in a manner consistent with the District Plan's growth management objectives. The location of a

⁶ General Rural Zone descriptions, Kāpiti Coast District E-Plan

proposed residential zoned development within this area is at odds with the intended outcomes of the plan.

Assessment of effects

The Site has proposed to be developed according to a masterplan, details of which are outlined in the Waikanae North Masterplan Design document. In summary the masterplan has broken the site down into four areas:

- Western Dunes - elevated land occupied by less regular residential lots and deformed spatial patterns. Dune tops retained as open space.
- Dune Foothills - suburban and medium density housing occupies gently sloping land at the eastern base of the dunes. Green corridors traverse the area.
- Local Centre - a mixed-use heart provides commercial destinations, shared spaces and community facilities.
- Eastern Flats - large flat areas suit conventional detached housing. Residential lots are integrated with restored wetlands.

Landscape effects

The Assessment concludes that landscape effects would be **moderate** adverse during construction reducing to **low-moderate** adverse post-establishment with positive effects over time. There is an identified transition from rural to suburban character, with effects reducing after mitigation planting establishes.

In assessing landscape effects, the Assessment generally follows best practice methodology and provides a comprehensive description of the site and project.

At the meeting held between WNDL and the reviewers on 28 November 2025, it was noted that the Assessment's assumption that retaining walls be limited to 1m in height may not be achievable given the large scale cut and fill proposed across the site. The Masterplan and Design Report on page 94 illustrates the locations of residential lot testing. It was requested that further residential lot testing was undertaken to reflect the lots which interface directly with the dunes so it could be understood how development would integrate with the existing landforms. In particular, Lots 491, 512 761 and 366 were noted to be of interest. These further lot tests have been provided in Appendix B (Part E) of the Masterplan Design Report which provide some understanding as to how the proposed development will integrate with the surrounding dune landforms.

A single long section through the development including across the western dune area was also included as requested in the landscape set (LA7.01-LA7.03) and is reproduced in the Masterplan Design Report (pages 34-35). The above information was considered helpful however, due to the scale, this still provided minimal detail on how these interfaces might connect better. There was no definition within the plan set as to the location, height and lengths where retaining walls might be required across the site. The Overall Earthworks Plan provided by Landlink Ltd illustrates potential cut depths of up to 28m and potential fill of up to 11m in the dune areas in order to flatten out the areas of dunes to accommodate development, which could potentially indicate that further retaining may be required, but little information was provided as to the location and extent of such retaining structures.

Following discussion at the 9 July 2026 meeting, Local Landscape Architecture's further response of 15 July 2026 states that additional cross sections have been prepared (Site Sections 04-1 to Site Section 17), which include boundary interfaces and steeper sites. The response states that these sections demonstrate that the highest and most visually prominent dune tops are retained as open space without houses or roads, and that height-restricted single-storey dwellings remain visually subservient to the dune landform.

Further information on the proposed location of retaining walls across the site has also been provided, on plan LA3.11. Local Landscape Architecture's response states that additional cross sections have been provided to demonstrate the earthworks design for steeper sites and to show that retaining structures can be limited to 1 metre or less through careful building placement and design. The response also acknowledges that there are currently no controls proposed for the height and steepness of cut faces. It supports the peer review recommendation that controls be added to ensure exposed faces are not too steep to be planted, and that any cut faces that cannot be planted are limited to below 1.5 metres in height. It also proposes that any unplanted cut faces should be planted in front with species capable of screening earthworks.

It is therefore recommended that a condition (or conditions) are put in place to limit retaining wall heights to a maximum of 1m, that any cut faces that cannot be planted are limited to below 1.5 metres in height and that unplanted cut faces should be planted in front with species screening earthworks, so that if the proposed development is granted consent, the outcomes sought within the Assessment are maintained.

In considering the above, the Assessment's conclusion that adverse landscape effects will be **moderate** during construction and reduce to **low-moderate** post-establishment, are broadly reasonable for the majority of the site. However, for the dune areas, this is considered to be slightly understated, given the scale of the works across these areas of defined landscape value. In this context, it is considered that landscape effects are more likely in the **moderate-high** adverse category during construction, reducing to **moderate** adverse post planting establishment.

Overall, in relation to landscape effects, while localised landform effects are able to be addressed, there remains a fundamental change in character from rural landscape to residential, in an area that is quite separate from other established residential areas, deviates strongly from what is anticipated by the District Plan for this area. In this context the development has the potential to create aberrant urban outcomes in relation to neighbourhood design and connectivity and its limited integration with the wider Kāpiti urban environment, which are discussed in further detail in the Urban Design review dated 16 July 2026.

A key feature of the current layout is that it relies wholly on planted mitigation to achieve any integration with the surrounding landscape, rather than utilising any design-led methods to assist with urban-rural integration.

The revised masterplan has incorporated some minor additional mitigation in the form of change to the lot layout at interfaces with the adjacent rural/rural residential areas, in particular along the northern site boundary. At the meeting of 9th July 2026, it was questioned whether this change of lot layout went far enough to provide satisfactory

transition. In the 15th July 2026 memorandum, it is stated that *“the development pattern and its surrounding context reflects a form of growth that is common throughout the Kāpiti Coast, where relatively compact residential neighbourhoods adjoin larger 1–2 ha (or greater) rural-residential properties without an intervening transition area. Nearby properties on Marram Way, Arapipi Way and the northern end of Peka Peka Road/along the western edge of Paetawa Road (the latter zoned General Residential Zone) exhibit a residential density comparable to that proposed and interface directly with the rural lifestyle lots along Paetawa Road.”*

Properties on Marram Way are residentially zoned properties in Peka Peka of around 800m² to 1,250m² which are then separated from the Rural Zone (which has properties at this edge of around 2.3ha) by residentially zoned properties on Paetawa Rd of around 0.5 to 0.8ha. Properties on Arapipi Way are of a similar size with the adjacent residentially zoned areas being lots of 0.5 to 1.9ha. This area in my view differs as it does not directly interface with the Rural Zone so therefore does not provide an equivalent example.

Contrast this with the proposed development which proposes along its northeastern edge (in the vicinity of proposed lots 837 to 845 and 846 to 853) lots of between 511-1402m² (proposed lots interfacing with the adjacent Rural Zone (a 60ha block, with Rural Lifestyle beyond being 1-4ha in size). The provided elevation does not depict particularly well the appearance of this interface, illustrating only the buildings on the nearest lots, when those on smaller lots of 434 to 451m² would be visible immediately behind.

The southern edge of the site in the vicinity of End Farm Road (lots 204-211) contains lots of 500 to 588m² interfacing directly onto the adjacent Rural Zone which has lifestyle properties with lots of 4.7 to 8.5ha. Given the constrained nature of access to the End Farm Road area (as discussed further in the Urban Design Review), it is considered that this area is unlikely to densify further and will remain rural lifestyle in character.

Following this, I still consider that issues with the interface of the development to the surrounding zones remain, particularly along the boundaries where residential density immediately interfaces rural/rural lifestyle areas.

Visual Effects

A broad and well-distributed set of viewpoints has been assessed, representing different audiences and distances (Sections 9.21–9.22). The report considers views from transport corridors, elevated eastern viewpoints on Hemi Matenga escarpment and local roads and demonstrates good coverage of the visual catchment.

Private property effects are also addressed systematically (Section 9.23). However, no verification from private viewpoints has been undertaken, relying on desktop analysis only.

The January 2026 BML review identified that further information such as visual simulations or cross sections were necessary to understand the scale of potential effects on the dune landforms and the development's potential visibility and visual effects on the localised and wider area. The cross-section information has now been provided and has been discussed above.

It was also noted during the discussion at the meeting held on 28 November 2025, that it was difficult, from the information provided, to understand where existing dwellings around the site boundary sit in relation to the proposed development. It was agreed by the applicants Landscape Architect that an additional drawing was required, illustrating the project in the context of neighbouring land / adjoining properties. This has been provided in the updated Site Landscape Context Map LA1.03. The Applicant has also supplied some selected drone photography which demonstrates the interface between the site and the adjacent dwellings and has provided further commentary around this and the potential effects on adjacent residents in the 15 July 2026 response.

Following the December 2025 meeting with WNDL, Local Landscape Architects revisited the site and agreed that the proposed buffer planting depth will increase from 2m to 5m. The January 2026 BML review accepted that the increase in planted buffer would be more likely to satisfactorily mitigate the effects of the proposed development on the immediate neighbouring properties, as it will provide some transition to the surrounding landscape and an adequate level of screening or separation from adjacent properties and allow the development to better integrate with the adjacent rural/rural lifestyle landscape. The Assessment concludes that visual effects will be **moderate to low-moderate** adverse during construction, reducing to **low–moderate** or low post-establishment of planting and I am generally **in agreement** with these findings.

Natural character effects

Section 7.6.4 of the LVA notes that *“The site is not identified as being within an area of mapped outstanding or high natural character. Similar to the approach to SAL’s, the chapter does not contain any rule triggers relevant to this application, with the sole relevance being consideration of the relevant policies”*⁷

The Kāpiti Coast District Plan requires that the effects of inappropriate subdivision, use and development are avoided, remedied, or mitigated and that inappropriate development does not result in further loss of coastal dunes in the area mapped as the coastal environment (Objective DO4).

There is no specific assessment of the natural character characteristics and qualities within the site and the effects of the proposed development on these characteristics or qualities. In the January 2026 BML review the Applicant was instructed to *“Provide an assessment of the proposal’s effects on natural character values, as outlined on p.217 of Te Tangi a Te Manu.”* This has not been provided and continues to be a shortcoming of the Assessment.

The Assessment has added some information in relation to natural character values noting that:

“The aforementioned coastal characteristics are preserved by limiting development within the wetlands and applying a sensitive design approach to dwellings within the dunes using extensive design controls that limit the height and colour of buildings and ensure that earthworks are designed to reflect the natural landform. The value of the dunes as a natural buffer is recognised by retaining the dunes in place and avoiding modification to the highest

⁷ Ibid, p37

peaks. The site does not connect to the beach but does provide dedicated walking trails throughout the dunes to limit the potential for damage from unmanaged access.”⁸

It is also noted that the project seeks to restore natural character within the site by enhancing existing wetlands with restorative planting and buffers, alongside the creation of new wetland areas, and that “*revegetation is expected to protect and enhance the dunes and enable a more natural dune function.*”

It is acknowledged that the project avoids those areas with the highest natural character values and restores natural character in other areas where degraded. What is not articulated within the Assessment is the effects the proposed development will have on the abiotic, biotic and experiential values of the dune landforms, which will undergo substantial modification to enable development.

The response from Local Landscape Architecture dated 15 July 2026 acknowledges that there is no discrete natural character section in the Assessment, but states that natural character matters are addressed within the broader character effects assessment. It records that the site’s natural character will change considerably, with adverse effects from houses and roads in some areas, and positive effects where wetlands and dunes are restored or enhanced.

The response also explains that areas considered to have the highest natural character values, including the two named wetlands and the most visually prominent dune peaks and ridges, are avoided. It further proposes additional controls for prominent dune lots, including a 5 metre building setback from open space and 4.5 metre height restrictions, to assist with maintaining separation from dune ridges and associated planting.

This matter is therefore addressed in part. The response provides a clearer rationale for how natural character has been considered and how the proposal avoids the highest value areas. However, it does not provide the structured natural character assessment sought, including identification of values and an assessment of effects on abiotic, biotic and experiential attributes.

Design measures and mitigation

A suite of mitigation measures is proposed, including planting, boundary treatment, building controls and earthworks design (Section 10.0). These include:

- Boundary screening, implementation of nature-based systems for stormwater (swales, wetlands, raingardens), and
- Native restoration planting (wetland buffers, dune planting).
- Building Controls - Building and structure heights are proposed to be limited in certain areas with height limits and colour controls (4.5 m on prominent dune lots; 8 m on less prominent dunes & external interfaces), All height-restricted interface lots are also subject to LRV ≤30% and a requirement for recessive cladding materials
- Fencing Controls - rural-style fencing on outer boundaries (≤1.5 m, permeable),

⁸ Ibid.

- Earthworks Controls - Earthworks design (avoid >1 m retaining, replant exposed faces within the first planting season)

There remains a stark transition between the urban and rural/rural lifestyle interfaces, which has been softened in some areas but still remains in others. The development is largely reliant on planting to achieve mitigation, with limited recourse to other strategies such as density reduction, setbacks or transition zones. This places high reliance on planting success to meet the desired outcomes. Reliance on future planting establishment to reduce effects needs to clear outcomes within in the condition set to achieve the desired result.

It is still considered that further mitigation is required in relation to the site interfaces with the surrounding environment. Methods that should be considered are the application of larger lots /a decrease in density at the interfaces with the rural area, or further distancing of the lots and dwellings from the boundary. It is noted that in their initial response to this, the Applicant has changed the development layout along the northern boundary and increased the planted buffer to 5m in line with the recommendation that any mitigation planting intended to create screening along these boundaries should be a minimum of 5m in width and planted at 1.5m centres and must achieve a minimum height of 4m. The Local Purpose reserve setback north of lots 795 to 810 is also noted.

As outlined above, it is recommended that controls are proposed around the height and steepness of exposed cut faces to ensure that cut faces can be planted as described in the Assessment. If cut faces are unable to be planted, their height should be limited to 1.5m. It needs to be clearly illustrated where screening vegetation will be located and specify species/height/density to ensure effective integration.

It is also recommended that a **Landscape Management Plan** is prepared for the site which details mitigation planting areas required for the project including ongoing management of the landscape areas. The planting plan should include details of layout, species, grades, numbers, spacing, eco-sourcing, and a programme and specification for implementation and maintenance, including outcomes the planting is required to achieve and timeframes for this.

Local Landscape Architecture's response accepts this recommendation. It states that the applicant is open to progressing a Landscape Management Plan to supplement the landscape plans and proposed consent conditions, and that it should include planting locations, screening and ecological planting, plant performance standards, species, grades, quantities, and a 5 year maintenance programme including weed control, pest management and replacement protocols.

The response also notes the need to avoid duplication with the proposed Ecological Restoration Management Plan, and states that a future iteration of consent conditions will address this point.

Outstanding matters

In summary, the proposed response addresses a number of the peer review matters and provides additional clarification, especially in relation to viewpoint photograph parameters, additional cross sections, the 5 metre rural interface buffer, planting density and the acceptance of a Landscape Management Plan.

The matters that appear to remain outstanding are as follows:

- A structured natural character assessment remains outstanding, particularly identification of natural character values and assessment of effects on abiotic, biotic and experiential attributes of the dune landforms.
- Design-led interface measures, such as setbacks, density reduction or transition lots, should be required at the most sensitive rural/rural lifestyle boundaries (e.g. at the northeastern edge in the location of proposed lots 837 to 845 and 846 to 853 and the southern edge in the vicinity of End Farm Road (lots 204-211)).
- The rural interface response remains reliant on planting, so conditions should secure the 5 m buffer, planting density, species, minimum screening height, timing, maintenance and replacement requirements.
- Controls for cut faces and batters remain to be incorporated, including maximum steepness, plantability, and a limit on unplanted cut faces, suggested as below 1.5 m.
- Retaining wall assumptions should be confirmed through revised conditions, particularly the commitment that retaining structures can be limited to 1 m or less.
- A Landscape Management Plan condition is still required, with clear performance standards, implementation timing, maintenance, monitoring and replacement obligations.
- The relationship between the Landscape Management Plan and the Ecological Restoration Management Plan needs to be clarified to avoid duplication or gaps.
- Updated consent conditions are required to capture the proposed 5 m setback for prominent dune-top lots, the 4.5 m height restriction, buffer planting requirements, cut face controls and LMP requirement.

Proposed conditions

Council's feedback will be provided on the proposed consent conditions when the updated set is received, as per Minute 1 from the Expert Panel.

Other matters

There are no other matters to note.

Attachment 1:

Method Statement

22 November 2023

This assessment method statement is consistent with the methodology (high-level system of concepts, principles, and approaches) of 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022. The assessment provides separate chapters to discuss landscape, visual and natural character effects where relevant, but is referred to throughout as a Landscape Effects Assessment in accordance with these Guidelines. Specifically, the assessment of effects has examined the following:

- *The existing landscape;*
- *The nature of effect;*
- *The level of effect; and*
- *The significance of effect.*

The Existing Landscape

The first step of assessment entails examining the existing landscape in which potential effects may occur. This aspect of the assessment describes and interprets the specific landscape character and values which may be impacted by the proposal alongside its natural character where relevant as set out further below. The existing landscape is assessed at a scale(s) commensurate with the potential nature of effects. It includes an understanding of the visual catchment and viewing audience relating to the proposal including key representative public views. This aspect of the assessment entails both desk-top review (including drawing upon area-based landscape assessments where available) and field work/site surveys to examine and describe the specific factors and interplay of relevant attributes or dimensions, as follows:

Physical –relevant natural and human features and processes;

Perceptual –direct human sensory experience and its broader interpretation; and

Associative – intangible meanings and associations that influence how places are perceived.

Engagement with tāngata whenua

As part of the analysis of the existing landscape, the assessment should seek to identify relevant mana whenua (where possible) and describe the nature and extent of engagement, together with any relevant sources informing an understanding of the existing landscape from a Te Ao Māori perspective. As this document is a peer review, it has not included engagement with mana whenua.

Statutory and Non-Statutory Provisions

The relevant provisions facilitating change also influence the consequent nature and level of effects. Relevant provisions encompass objectives and policies drawn from a broader analysis of the statutory context and which may anticipate change and certain outcomes for identified landscape values.

The Nature of Effect

The nature of effect assesses the outcome of the proposal within the landscape. The nature of effect is considered in terms of whether effects are positive (beneficial) or negative (adverse) in the context within which they occur. Neutral effects may also occur where landscape or visual change is benign.

It should be emphasised that a change in a landscape (or view of a landscape) does not, of itself, necessarily constitute an adverse landscape effect. Landscapes are dynamic and are constantly changing in both subtle and more dramatic transformational ways; these changes are both natural and human induced. What is important when assessing and managing landscape change is that adverse effects are avoided or sufficiently mitigated to ameliorate adverse effects. The aim is to maintain or enhance the environment through appropriate design outcomes, recognising that both the nature and level of effects may change 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. The level of effect has not been quantified where the nature of effect is neutral or beneficial. 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 minor⁹ or if an adverse effect on the environment is no more than minor¹⁰. 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.

⁹ RMA, Section 95E

¹⁰ RMA, Section 95E

This assessment has adopted the following scale applied to relevant RMA circumstances¹¹ (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 significant¹².

SIGNIFICANT						
LESS THAN MINOR	MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

¹¹ Seven-point level of effect scale. Source: Te tangi a te Manu, Pg. 151

¹² 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.