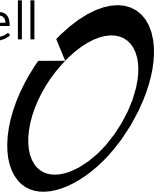


APPENDIX D

LANDSCAPE VISUAL ASSESSMENT

Boffa Miskell




635 Whatawhata Road Subdivision

Assessment of Landscape and Visual Effects
Prepared for Waikato District Council

26 September 2019



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1.0 Introduction

1.1 Scope of the report

Boffa Miskell Limited (BML) has been engaged by Waikato District Council in July 2019 to undertake an independent Landscape and Visual Effects Assessment (LVA) for a received application for a 10-lot subdivision at 635 Whatawhata Road, Whatawhata, (otherwise referred to as The Site in this report).

The applicant is G&S Singleton Family Trust, with the site comprising two lots¹ with a total land area of 45.6688ha. The Site is zoned Rural within the Waikato District Plan and is historically known as the old Westlands Country Club and Golf Course.

The following Landscape and Visual Assessment assesses the landscape and visual effects of the proposed rural residential subdivision on the immediate and surrounding environment character. As an independent assessment this report provides recommendations to the applicant on subdivision design measures and outcomes that can be applied. The assessment has included a preliminary opinion (Refer Appendix 6) and two meetings with the applicant and the applicant's consultant team. In our independent role Boffa Miskell has not prepared or influenced the design outcome of the subdivision, other than providing a preliminary opinion.

A draft copy of this report (6th of August 2019) was provided to the applicant and Council to provide opportunity to respond to key effects matters identified. This is recorded in the content of this report where further information has been provided and any impact this has on the level of effects identified.

The baseline permitted activity for the site enables subdivision to create one additional lot. The application seeks to create eight additional lots from two existing titles. The applicant has detailed their intentions to establish framework tree planting throughout that will visually surround the site in canopy tree cover.

1.2 Assessment Process

This assessment has been undertaken with reference to the Quality Planning Landscape Guidance Note (Boffa Miskell Limited)² and its signposts to examples of best practice, including: the UK guidelines for landscape and visual impact assessment³ and the New Zealand Landscape Institute Guidelines for Landscape Assessment⁴. A full methodology is outlined in **Appendix 1** of this report. In summary, the effects ratings are based upon a seven-point scale which ranges from very low to very high.

In order to characterise the site and surrounding landscape and identify the visual catchment a site visit was undertaken on the 24th of June 2019 with the applicant and Council's processing planner, Cameron Aplin of BCD Group. During the site visit building platforms and lots were visited, and the wider visual catchment visited and photographed.

¹ Lot 1, DPS 12627 and Lot 2 DPS 1267

² <http://www.qualityplanning.org.nz/index.php/planning-tools/land/landscape>

³ Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013

⁴ Best Practice Note Landscape Assessment and Sustainable Management 10.1, NZILA

2.0 Existing Environment

2.1 Landscape Context

Refer Appendix 5 – Visual Analysis – Site Context Photographs

Sited within the peri-urban western edge of Hamilton City. The landform comprises an interplay of rolling pastoral and urbanised hills with valleys connecting to pastoral plains. The plains are compartmentalised into grazing paddocks and reflect the broader and iconic Waikato Plains, but are smaller in scale set amongst rolling hills.

The rolling hills rise up to 40m above the elevated river plains system. A series of hilltops surrounding smaller pockets of river plains, ranging in elevation from RL68 to RL88. Road networks extends along the foothills and atop the ridgelines of these hill ranges with Howden Road and Wallace Road extending along the top the hillsides.

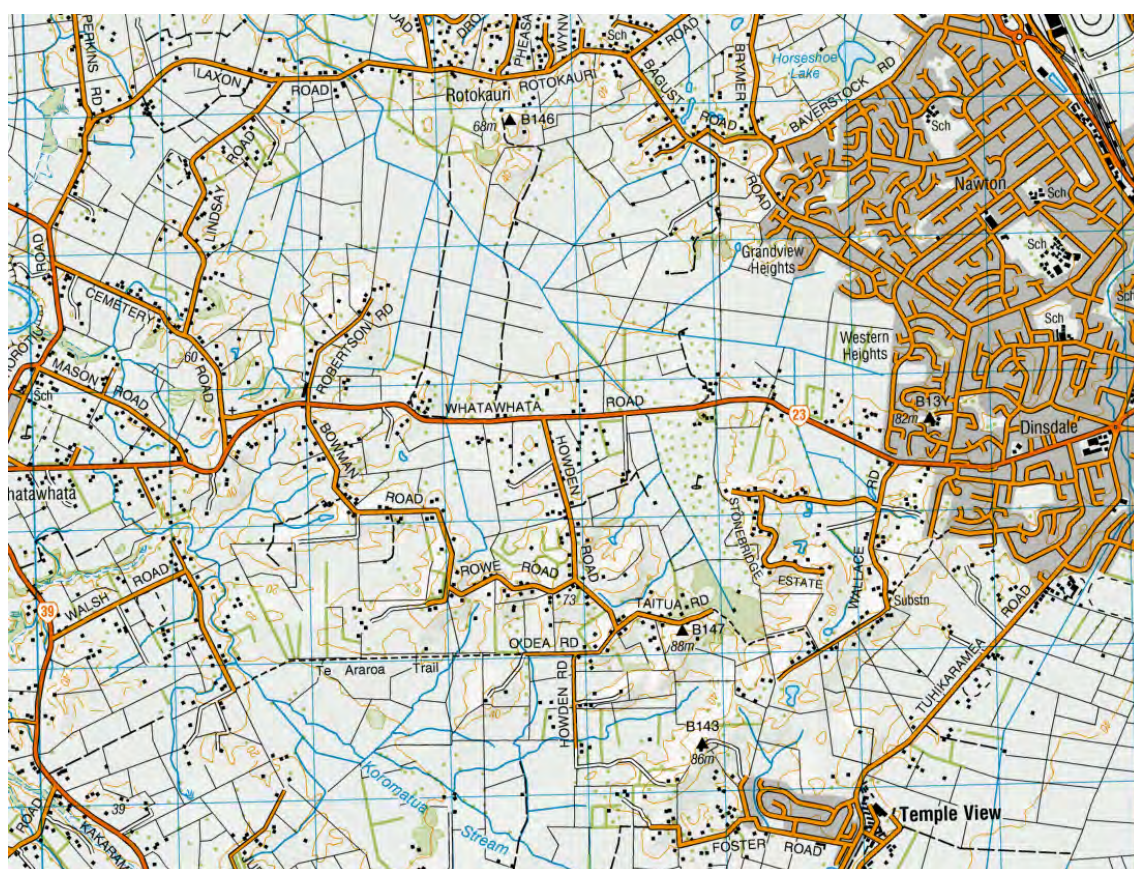


Figure 1 – extract from www.topomap.co.nz

Vegetation cover in this landscape comprises mainly exotic tree and shrub vegetation with few remnants of pre-human native vegetation cover present. The predominant land cover comprises productive pasture and cropping, with the site and its immediate surrounds providing a unique clustering of large exotic and native tree cover. To the south of the site the Taitua Arboretum includes extensive exotic and native tree cover on the northern slopes of the Howden Road and Wallace Road hills.

At a wider scale between Tuhikaramaea Road and Kakaramaea Road the pockets of rural residential housing and associated vegetation cover reside along the road corridors with the rural pastoral plains landscape dominating to the south of Tuhikaramaea Road and to the north of State Highway 23 (Whatawhata Road).

Clusters of rural residential housing and housing supporting rural land blocks are sited along road corridors. To the west of the site Howden Road includes clusters of housing along the crest and foothills of the road ridgeline.

Similarly, to the east the rural farmpark of Stonebridge comprises even smaller lots set top a ridgeline that overlooks the subject site. Smaller clusters of housing sit alongside Wallace Road further to the east and south of the site. Further east again the residential suburb of Dinsdale forms a definitive edge to the city limits.

2.2 Site Description

Refer Appendix 5 – Visual Analysis – Site Appraisal Photographs

The site comprises the old Westlands Country Club and Golf Course and forms a linear site extending from SH23 (Whatawhata Road) to the south, meeting rural properties and the Taitua Arboretum at its southern boundary.

The site sits on the cusp of a rolling hillside with the eastern edge of the site siting on the mid to lower slopes of the hillside. The mid to western portion of the sites falls to the lower rural plains landform with knolls and mounds sited throughout from the remnant golf course.

Drains extend through the site from the south to north both along the boundary and within the site, collecting water from the internal and surrounding gully networks. Vegetation cover on the site is largely mature canopy vegetation and remnant of the golf course. New wetland, pond and shelter planting has been installed by the applicant to strengthen the natural features and framework planting around the site. Large areas of Redwood trees have been installed along the western boundary and along parts of the eastern boundary.

2.3 Visual Catchment

The visual catchment is largely confined to nearby private dwellings and land and the road network of SH23, Howden Road and Wallace Road. The viewing catchment comprises dwellings on Howden Road's eastern slopes, the northern slopes of Wallace Road and properties on the western slopes of Stonebridge subdivision. Road based views are limited to small areas of Howden Road and Wallace Road (as photographed in Appendix 6) and along State Highway 23 between the site and Howden Road.

3.0 Relevant Statutory Provisions

As part of this assessment, there are a number of planning provisions that are relevant to this project (refer to Appendix 2 of this report). Specifically, they include:

- Waikato Regional Policy Statement
- Operative Waikato District Plan.
- Proposed Waikato District Plan

The site is located within the Rural Zone under the Operative and Proposed Waikato District Plan, and adjoins the Taitua arboretum, designation E3 under the District Plan. The site is otherwise surrounded by rural properties.

Under the Waikato Regional Policy Statement, Objectives 3.12 Built Environment, 3.21 Amenity, and 3.22 Natural Character are relevant to considering the application. In addition, Policy 6.1: Planned and co-

ordinated subdivision, use, and development, and 'Principles specific to rural-residential development' are also considered relevant to the application.

Under the Operative Waikato District Plan, the issues and objectives identified under Chapter 13 focus on preserving Rural Character (13.6.1) through considering methods for managing rural subdivision and development scale, density, intensity and location. Policies 13.6.2 and 13.6.6 are of primary focus for considering effects and the intent behind the objective of preserving rural character.

Under the Proposed Waikato District Plan, the issues and objectives identified under Chapter 5: Rural Environment (containing sections 5.1 The Rural Environment and 5.3 Rural Character and Amenity) are relevant to the proposal. This chapter contains Objectives 5.1.1, 5.2.1, and 5.3.1, and Policies 5.2.3, 5.3.2, 5.3.4, 5.3.5, 5.3.7, 5.3.8, and 5.3.9 are relevant to considering activities in the Rural Zone.

There are no provisions in the Waikato Regional Plan that are explicitly applicable to the protection of landscape and natural character values.

3.1 Non- statutory material

Informing the Operative Waikato District Plan is the Technical Landscape Study which characterises broad landscape character areas. A recent review of this study, to inform the Waikato District Plan review, has been undertaken and characterises this area of the district as:

"The pattern of land use is dominated by productive agricultural land use of mainly dairy farming and cropping. Set along river terraces and a lower foothill rolling landscape, the productive land use has created an arcadian patterned landscape. Pockets of native vegetation remain within gullies and wetlands, with clustering of dwellings set alongside road corridors in the rural extent of the area."

The is not identified as being within or nearby an Outstanding Natural Feature or Landscape or a Significant Amenity Landscape.

The Waikato Regional Council's Regional Landscape Study⁵ also provides the following analysis of the Waikato Plains landscape

"The main pressure on this area is the demand for residential homes in a rural setting – i.e. rural residential development, particularly given the large nearby populations of Auckland and Hamilton. State Highway One runs along beside the Waikato River, and two 200 kV lines cross the Waikato River north east of Hamilton."

4.0 Proposal Description

The proposal seeks to create a 10-lot subdivision within the now retired Westlands Country Club and Golf Course at 635 Whatawhata Road, Whatawhata. The subdivision includes three existing buildings within the proposed house sites (Lots 3, 8, 9 and 10) and the provision of seven additional buildings / dwellings into the landscape. The build areas would allow 300 – 600m² buildings plus curtilage to occur within these areas. The assessment is based on this supplied building layout within the subdivision. The proposed subdivision will see the retention of the existing vegetated framework of large canopy trees, riparian planting and wetland plantings throughout the site, reflecting the established character of the prior golf course. Some of the existing and proposed additional planting will be protected under a Vegetative Covenant Area (Refer Appendix 4). Further planting around the site has and continues to be undertaken by the applicant to reinforce the existing framework planting.

⁵ Waikato Regional Landscape Assessment (Environment Waikato Technical Report 2010/12)

As a result of identification of existing planting which contributes to the character of the site and wider area, additional areas of vegetation were included in the final vegetation covenant plan below. This included protection of the northern areas of planting and planting along the eastern and western boundaries.

A central spine right of way exists within the site and will provide the central road access to each of the proposed lots. Several the proposed driveways are sited on existing tracks and accessways within the site, many of which are remnants of the golf course.



Figure 2 – Proposed Scheme Plan



Figure 3 – Proposed Scheme Plan with Vegetative Covenant Areas

5.0 Assessment of Effects

Landscape and visual impacts result from natural or induced change in the components, character or quality of the landscape. Usually these are the result of landform or vegetation modification or the introduction of new structures, facilities or activities. All these impacts are assessed to determine their effects on character and quality, amenity as well as on public and private views.

In this study, the assessment of potential effects is based on a combination of the landscape's sensitivity and visibility together with the nature and scale of the development proposal.

Particular effects considered relate to the following:

- *Landscape / rural character effects*
- *Visual amenity effects from public and private locations;*
- *Potential cumulative effects; and*
- *Effects in relation to statutory provisions.*

The principal elements of the proposal that will give rise to landscape and visual effects are related to the introduction of eight additional dwellings above what is anticipated by the current rural zone provisions within the District Plan. The increased density and effects have on the rural character is of key consideration. Visual effects relating to the surrounding viewing audience, including road users and neighbouring residents are relevant to this proposal.

5.1 Landscape Effects

5.1.1 Rural Landscape Character Effect

Landscape character is derived from the distinct and recognisable pattern of elements that occur consistently in a particular landscape. It reflects particular combinations of geology, landform, soils, vegetation, land use and features of human settlement. It creates the unique sense of place defining different areas of the landscape.

The rural landscape is often described in New Zealand as representing an arcadian landscape of productive pastoral land use. In many instances this varies from area to area and can range from bush clad hills and wetlands, pastoral plains, rolling pastoral hills with clustered housing amongst, woodlots, forestry and horticultural blocks. Each rural landscape evokes its unique characteristics and when considering effects, the existing character forms a baseline to be assessed against.

The rural landscape for this area comprises a mixture of vegetated hillsides with pockets of rural residential housing and rural housing. The heavily treed landscape within the site and adjoining arboretum are unique to this landscape type and are representative of the past and present land uses as manicured and planted treed landscapes.

The introduction of housing into the hillsides of this rural area exists along the Howden Road and Wallace Road corridors and ridgelines. The introduction of eight additional house sites into the subject site, placed on the hills slopes and lower plains, is set amongst a heavily treed landscape that connects to the Taitua Arboretum to the south. The Site transitions into a head of a pastoral plains set at the foot of the Howden Road / Wallace Road hills.

The landscape patterns of vegetation, landform and built form within the area and particularly on the site reflect are distinctive to areas where built form within the rural landscape is sited. The broad open rural plains remain largely unaffected by the proposal. The connectivity of the site's open rural landscape to the rural plains has been disconnected to some degree by the historic land use of the site as a golf course.

Continuation of framework trees through current and proposed planting reinforces the character of the site and the Taitua Arboretum in the rural landscape.

The site has not been for some time, a productive rural landscape area, with the historic land use as a golf course. The treed landscape creates a secondary buffer between the rural and urban landscapes but visually creating a barrier for western based views of the urban limits and Stonebridge farm park subdivision.

The Site, by way of existing on site character, location, landform and vegetation cover provides capacity to absorb a land use change as a result of its unique present characteristics. The balancing of open rural land between built development is an important characteristic of the rural landscape. There are areas within the site that are considered to contribute to this balancing effect where the site's characteristics balance the built form of the surrounding land use.

The central lots are sited along the base and sidings of the eastern hillside. Existing and proposed protected treed vegetation frames all of the house sites. The clustering of the house sites of Lots 1 – 5 and 10 creates a similar dispersal of house sites as the grouping of houses at the entrance to Howden Road. This approach retains the openness between the groupings and protects the lowland plains and rural character margins of the site from development. Separately these lots (1, 2, 3,4 ,5 and 10) introduce a low degree of adverse landscape effects upon the rural character of the area.

Lots 6 and 7 house sites reside within areas of the rural landscape that connect into landform and landscape character changes between the site and its surrounds. Both lots sit directly on the southern boundary at the transition between the site and its surrounding rolling hills (Lot 7) and rural plains (Lot 6). The balancing of open space and the role these areas of the site provide for separating Lots 1 – 5 and 10 from the surrounding rural landscape and the elements that reside within the surrounding landscape. Spatially these two house sites have potential to introduce low to moderate adverse effects on the landscape character to the surrounding rural character when considered in the context of the overall proposed subdivision (inclusive of Lots 1 – 5 and 10).

5.1.2 Direct Landscape Effects

The direct effects on the biophysical elements of the landscape including earthworks, vegetation removal, hydrological changes etc are minimal. The proposed house sites will require minor changes to the landform for establishment of the building foundations with no planned changes to the overall landform. The management of the waterways have been enhanced, where managed by the applicant, with the inclusion of wetland areas and riparian planting.

Vegetation patterns are being reinforced on site to strengthen the framework planting within the site and its connection to the Taitua Arboretum. Considering the landform, hydro effects generated will be positive in nature.

5.1.3 Summary of Landscape Effects

The Site, by way of existing on site character, location, landform and vegetation cover provides capacity to absorb a land use change as a result of its unique present characteristics. The balancing of open space and the role these areas of the site provide for separating Lots 1 – 5 and 10 from the surrounding rural landscape and the elements that reside within the surrounding landscape. The clustering of the house sites of Lots 1 – 5 and 10 creates a similar dispersal of house sites as the grouping of houses at the entrance to Howden Road. This approach retains the openness between the groupings and protects the lowland plains and rural character margins of the site from development. Separately these lots (1, 2, 3,4 ,5 and 10) introduce a low degree of adverse landscape effects upon the rural character of the area.

With the overall subdivision and the inclusion of Lots 6 and 7 house sites the potential adverse landscape effects, with regard to landscape character has potential to introduce low to moderate adverse effects on the landscape character to the surrounding rural character when considered in the context of the overall proposed subdivision (inclusive of Lots 1 – 5 and 10). The inclusion of additional landscape vegetation treatments

around Lots 6 and 7, with the mature scale and nature of the planting, these effects can be reduced to a low adverse level. The integration with the vegetation patterns of the Taitua Arboretum to the south and the existing vegetation within the subject site will assist in the mitigation of landscape effects.

5.2 Visual Effects

Visual amenity effects are influenced by a number of factors including the nature of the proposal, the landscape absorption capability and the character of the site and the surrounding area. Visual amenity effects are also dependent on distance between the viewer and the proposal, the complexity of the intervening landscape and the nature of the view.

As detailed earlier the visual catchment has been identified, visited and public vantage points that are also representative of potential private vantage points have been photographed. The existing and planned condition of the site is such that a number of views into the site are currently, and in the future, will be screened from external views.

Public vantage points have been observed along SH23 (Whatawhata Road), Howden Road, Taitua Road, Stonebridge Road and Wallace Road. Private vantage points include views from residents sited along these road corridors. Given the location of the Site on the western slopes of a hill, and the rising landform to the south and west, the visual catchment is confined to a small visual catchment.

Views from Howden Road residents are between 3300 to 800m from the site and are mainly elevated with angled views of the site and the wider landscape. Views from Taitua Road are isolated to two dwellings with elevated open views toward the site and are between 300-400m from the nearest proposed lot (Lot 7). Views from Wallace Road residents are some 700m – 1km from the site.

Views from Stonebridge Road are subtle and include some of the dwellings, evaluated from on site observations. The properties identified as potentially visually affected include 13 – 25 Stonebridge Road. Some of these properties are visually obscured from some of the house sites within the proposed subdivision and the potential effects are detailed further within this report.

The submitted Proposed Covenant Vegetative Area (Visual Mitigation) Plan provides for retention and enhancement of planting within the site. This protects and enhances existing vegetation areas whilst also providing for new planting areas of planting, the type, height and objective of vegetation cover is not specifically notated in this plan. Further information provided⁶ included in Appendix 4 by way of email, details species of plants included. Detailed in Table 1 below the information received detailing new planting within the Vegetation Covenant Areas.

Planting Area	Species	Common Name	Height in 5 years	Mature Height
Main Boundary Planting	<i>Sequoia sempervirens</i>	Californian Coastal Redwood	8.0m in 5yrs	15.0m
	<i>Thuja placate</i>	Western Red Cedar	4.0m in 5rs	30.0m
Intermittent Boundary Planting	<i>Fuscospora solandri</i>	Black Beech	3.0m in 5yrs	20.0m
	<i>Metrosideros excelsa</i>	Pohutukawa	3.0m in 5 years	10.0m
	<i>Agathis australis</i>	Kauri	3.0m in 5 years	40m
	<i>Leptospermum scoparium</i>	Manuka	2.0m in 5 years	4.0m
Sub Canopy Planting	<i>Pittosporum crassifolium</i>	Karo	7-10years – 5m	
	<i>Pittosporum eugenoides</i>	Lemonwood	7-10years – 6m	
	<i>Pittosporum tenuifolium</i>	Kohuhu	7-10years – 5m	

⁶ Further information provided, following issue of Draft LVA Report.

Table 1 – Proposed Tree Plantations

In order to ensure both existing planting and the above proposed planting (mostly installed) identified for protection is maintained, a detailed vegetation covenant plan, including identification of groupings of plantings, should be included as part of the subdivision consent. This can be undertaken by way of a condition of consent which requires a detailed landscape plan be prepared for the approval of Waikato District Council.

5.2.1 Effects from public vantage points

State Highway 23 – Refer to Appendix 5- Figures 14, 15, 16, 17 and 19.

Views to the site are confined along SH23 to between the site's entrance and the cluster of housing at 705 Whatawhata Road, near Howden Road. The open lowland pasture covered plains provide views into the northern extent of the site, when travelling west along SH23. Views are intermittent with potential views to house sites eliminated by the existing canopy vegetation.

Existing vegetation to the north of proposed Lot 1 provides substantial visual screening of Lots 1 -6 and 10 within the site. Lot 7 will be a distant view and proposed covenant planting of Giant Californian Redwoods with native understorey will in time completely screen this site from view.

The sensitivity of this viewing audience as users of SH23 is relatively low with the visual exposure to the site being restricted in view and time. The magnitude of visual change will be indiscernible based on the existing environment and field assessment. The visual effects attributed may result if all vegetation north of Lot 1 were removed, which could open views to Lots 1, 2 and 4.

It is recommended that some of the existing tree planting areas north of Lot 1 are also protected to continue the existing visual integration and character of the site.

Howden Road – Refer to Appendix 5- Figure 13

The public view from Howden Road is fleeting and sited near 89c Howden Road. This view captures the mid to southern extent of the proposed subdivision. Views of the proposed Lots will be minimal with potential for views of Lot 10 set behind dominant existing tree vegetation within the site. Protected and existing amenity planting throughout the site provides substantial screening. For this public viewing point the visual sensitivity of the viewing audience will be low due to the infrequency, fleeting view and the distance of some 500m from the subject site.

The magnitude of visual change will be low with minimal housing visible from this location. The potential adverse visual effects will be very low in nature for this viewing audience.

Wallace Road – Refer to Appendix 5- Figure 18

The public view from Wallace Road is fleeting and sited at the end of the road. This view captures the eastern edge of the site. Views of the proposed lots 6, 10 and 2 will be extremely limited. The Taitua Arboretum, existing off site vegetation cover, on site vegetation and rolling landform provides screening of much of the proposed lots. For this public viewing point the visual sensitivity of the viewing audience will be low due to the infrequency, fleeting view and the distance of some 700m from the subject site.

The magnitude of visual change will be low with minimal housing visible from this location. This considers the existing and proposed covenant vegetative area for visual mitigation provided for. Consequently, the potential adverse visual effects will be very low in nature for this viewing audience.

5.2.2 Private Effects from private vantage points

State Highway 23 – Refer to Appendix 5- Figures 14, 15, 16, 17 and 19.

680 Whatawhata Road (SH23) is located to the northwest of the site and has potential for views south across the plains landscape into the site. The dwellings within the site are orientated northward away from the road (and site) and screen planting within the site screen the dwellings from the road corridor.

The sensitivity of this viewing audience are of a low to moderate level. With the existing vegetation both within 680 Whatawhata Road and within the subject site, views to the proposed house sites within the lots will be obscured. Taking this into account, and the reliance on existing vegetation within the site, the potential adverse visual effects will be of very low in degree.

A cluster of rural residential housing at the intersection of SH23 and Whatawhata Road includes a number of dwellings that orientate both northward and westward. These dwellings include 699, 703 A-C, and 705 Whatawhata Road. Based on field observations and aerial photography 679 and 699 Whatawhata Road have orientated its visual outlook eastward across the lowland plains toward the site. This cluster of residential housing has a low to moderate degree of visual sensitivity with regard to visual change. Largely the visual outlook focuses on the northern to midway areas of the property.

The existing tree cover both along the periphery and internally within the site provide substantial screening of future dwellings within the central lots. The magnitude of visual change will be low in degree. Taking both the existing vegetation, including covenant planting, will provide a substantial level of visual mitigation and integration of future dwellings into the visual outlook. For this cluster of dwellings it is considered the potential adverse visual effects will be low in degree.

Howden Road – Refer to Appendix 5- Figure 13

The private views from 73,89A - C, 105 Howden Road have been identified as having potential views toward the mid to southern extent of the proposed subdivision. These views are limited by landform, vegetation (both off and on site) and distance (500m) from the subject site. The extent of view dominated by the ridgeline that sits to the east of the site, housing the Stonebridge Road subdivision. The sensitivity of this viewing audience is considered to be low to moderate. The magnitude of visual change will be low with minimal housing visible from this location. The potential adverse visual effects will be low in nature for this viewing audience.

Taitua Road – Refer to Appendix 5- Figure 13

The private views Taitua Road potentially includes 31 and 35 Taitua Road. The nearest house site will be within Lot 7 which is screening from view by existing and Covenant Vegetative Area and vegetation within the Taitua Arboretum. This viewing audience has limited views of the subject site, with potential long views to the central lots 1 – 5. The sensitivity of this viewing audience is of a low degree. The magnitude of visual change will be low with existing and further tree canopy vegetation proposed. The potential adverse visual effects will be very low in nature for this viewing audience.

Wallace Road – Refer to Appendix 5- Figure 18

The private views from Wallace Road are distant and interrupted with landform and vegetation. Largely this viewing audience captures the eastern edge of the site. Views of the proposed lots 6, 10 and 2 will be extremely limited due to the intermediary off site and on site vegetation. The Taitua Arboretum, existing off site vegetation cover, on site vegetation and rolling landform provides screening of much of the proposed lots. For this reason the visual sensitivity of the viewing audience will be low due to the infrequency, fleeting view and the distance of some 700m from the subject site.

The magnitude of visual change will be low with minimal housing visible from this location. This considers the existing and proposed covenant vegetative area for visual mitigation provided for. Consequently, the potential adverse visual effects will be very low in nature for this viewing audience.

Stonebridge Road – Refer to Figures 4, 5, 7 and 8.

The public view from the private road of Stonebridge Road subdivision comprises a number of nearby dwellings set in a farm park development. Views from 13 – 25 Stonebridge Road overlook the mid to southern extent of the site comprising largely views of the house sites for Lots 2, 3, 4, 6 and 10.

The sensitivity of this viewing audience is considered to range from moderate to high, to high, given their proximity to the site. Existing vegetation cover within the subject site provides a substantial extent of visual screening between the Stonebridge Road dwellings and the site. The most visually sensitive dwellings to the proposed subdivision design, within Stonebridge Road, are 14 and 23 Stonebridge Road. This is based from onsite observations.

Proposed Lots 2 and 10 will be visible to primarily to 13 and 14 Stonebridge Road. Lot 10 will also be available to views from 15 to 21 Stonebridge Road. Existing planting along the eastern boundary and within the site provides a substantial amount of visual screening between these sites/ Proposed additional boundary planting was observed on site however this planting is not shown on the Covenant Vegetative Area. The inclusion of the two lots visually would be seen with potential glimpses of Lots 1 and 4 also, which exceeds an anticipated visual outlook by the operative District Plan. The magnitude of visual change when considering the permitted environment would be of a low to moderate degree.

The introduction of Lot 6 into the southern end of the site will have potential views from 21 – 25 Stonebridge Road. Existing vegetation, landform and the placement of Lot 6's house site, demonstrates on site that views are mostly gained from No.23 Stonebridge Road. These views will also be seen in the context of potential views to Lot 5. The magnitude of visual change from an open and treed parkland to a house site with parkland surrounding for Lot 6 will be of a low to moderate degree. This takes into account the proximity of dwellings within the Stonebridge Road subdivision where Lot 6 will sit sleeved amongst a clustered housing development to the north and south.

The magnitude of visual change varies for each of these dwellings with the inclusion of the proposed lots. The inclusion this subdivision will see a low to moderate level of adverse visual effect which can be suitably mitigated for Lots 1 – 5 and 10 with visual mitigation planting additional to that shown on the Covenant Vegetative Area plan.

5.2.3 Summary of Visual Effects

The magnitude of visual change varies for each of these dwellings with the inclusion of the proposed lots. The inclusion this subdivision will see a low level of adverse visual effect which is suitably mitigated for Lots 1- 10 with visual mitigation planting shown on the Covenant Vegetative Area plan.

The integration of built form into this landscape requires not only sensitive placement, vegetation management but also building design management to ensure the built form visually integrates to the rural landscape. A set of design controls are proposed as part of the recommendations set out in Section 6.0 of this report.

5.3 Potential Cumulative Effects

There is potential for cumulative visual effects to occur because of the proposal. This relates to the inclusion of the adjacent rural residential farm park to the east and the cluster of rural residential housing to the west, near Howden Road. The extension of rural residential housing into the rural landscape has potential to introduce a cumulative effect when considering the rural character of the zone and surrounding environment.

As considered in the landscape assessment section of this report the character includes an existing clustering of rural residential housing along the hills and sidling's within the immediate area. The spatial distribution of dwellings / house sites within the proposed subdivision retains largely the open space values of the broader area, recognising the site's unique characteristics. The density of the subdivision protects edges of the

northern and central area of the site from development with the southern end (Lots 6 and 7) sleeving into the adjoining development and lowland plains area.

Overall the density of development, whilst not provided for within the District Plan, responds to the location, characteristics of the site and the surrounding landform and vegetation cover. The additional dwellings within the subdivision introduces a low degree of adverse cumulative effects when considering the broader landscape character of the area.

5.4 Effects in relation to Statutory Provisions

The Operative Waikato District Plan specifically seeks to provide for a productive rural landscape that evokes its unique rural character. The introduction of eight additional lots into this landscape responds to the unique characteristics of the site, whilst retaining for most parts the broader landscape patterns.

The spatial distribution of lots and the sleeving lot of Lot 10 retain the open patterns and unique patterns of this site in the landscape. The areas where a higher degree of effect has been identified sit with Lots 6 and 7 and their interrelationship with the surrounding built patterns and landform.

The operative Waikato District Plan provides direction on how the Plan envisages managing rural character when considering subdivision. The analysis of these provisions and how the proposal either meets or does not meet these policies is provided below:

Objective 13.3.1 – Rural Character is preserved Policy 13.6.2 – Rural Subdivision and development should be of a density, scale, intensity and location to retain or enhance Rural Character, including;	Commentary
<i>(aa) a predominance of natural features over built features.</i>	The existing and proposed tree cover provides a clear dominance of 'natural' features over the built form proposed.
<i>(a) A very high ratio of open space in relation to areas covered by buildings</i>	Whilst a specific ratio has not been set, the overall rural zone provisions provide direction on the expected ratio. The proposed subdivision would not meet this expectation but provides a sleeving approach to many of the proposed lots to manage the interface with surrounding peri-urban and rural development.
<i>(b) Open space areas in pasture, trees, crops or indigenous vegetation</i>	This policy provides a direction on the anticipated elements of the rural zone. The existing site includes some but does not represent a typical 'productive' rural landscape and is more so a parkland landscape.
<i>(c) Tracts of unmodified natural features, indigenous vegetation, streams, rivers, wetlands and ponds.</i>	As above.
<i>(d) Large numbers of farm animals and wildlife</i>	As above regarding the existing parkland character. It is noted the considerable amount of tree and indigenous species planting, coupled with its locality adjoining Taitua Arboretum the site provides a habitat for wildlife.
<i>(e) Noises, smells, sights of farming, horticultural and forestry uses</i>	The site reflects the unique rural characteristics of this area including views to the wider pastoral rural landscape,

	Taitua Arboretum and provision of open space surrounding the house sites.
<i>(f) Post and wire fences, purpose built farm buildings and scattered dwellings.</i>	The subdivision provides existing buildings of this nature, however established for the historic golf activities as implement sheds and the like. The house sites are scattered within the site and create open spaces between them.
<i>(fa) Low population density</i>	The proposal would increase the local population in a manner which is consistent with the density found along road corridors and is less than the adjoining rural farm park development.
<i>(g) Generally narrow carriageways within wide road reserves, often unsealed with open drains, low-speed geometry and low traffic volumes</i>	The proposal would provide all of these outcomes sought, excluding an unsealed road.
<i>(h) A general absence of urban-scale and urban-type infrastructure such as roads, with kerb and channel, footpaths, mown berms, street lights, advertising signs, sealed and demarcated parking areas, decorative fences and gateways.</i>	It is understood this is the intent. To further ensure this outcome is achieved the recommended design controls include avoidance of these elements.
<i>(i) A diversity of lot sizes, shapes related to the character and pattern of the landscape.</i>	The site includes some diversity, with a larger parent lot sleeving around the entire site. The broader rural scale of lot size is not achieved.
13.6.4 <i>Allocated created by subdivision should be of a shape and sufficient size to retain the Rural Character of the area by ensuring they are large enough for rural land uses to predominate</i>	The existing site does not currently provide for the noted rural land uses set out under (e) above. This policy cannot be achieved by the site itself with the character of the site requiring substantial change from its existing character to accommodate the rural land uses anticipated by the plan. The balancing of open space within the proposed scheme and its contribution to the wider spatial context of rural land use requires some further consideration at the southern extent of the site.

The Operative Waikato District Plan seeks to retain and preserve the rural character of the rural zone. The subject site exists with a unique character which contributes to the unique character of the area on conjunction with the Taitua Arboretum and the hillsides surrounding them. A number of policies can be met by the proposal however the scale of the subdivision and existing character of the site differ to what is anticipated by the plan.

There are unique elements to the site and its surrounding landscape which will retain the balancing of the open space with clusters of dwellings alongside road corridors and atop the hills that surround the site. There is potential for a low – moderate adverse effect when considering the policy context and mitigation measures proposed.

6.0 Recommendations

The proposed subdivision introduces a change from a parkland amongst a pastoral rural landscape and adjoining rural residential area to a rural residential development. The retention of the parkland qualities that contribute to the broader landscape patterns are important alongside the management of built form that is responsive to the rural characteristics and peri-urban landscape.

The potential adverse landscape and visual effects are largely associated with the changes in density of the development and the visual amenity of this rural landscape. The following design measures are considered necessary to minimising the potential adverse landscape and visual effects. These measures are recommended to be included in Landscape Management Plan which should be prepared for the approval of Waikato District Council.

Vegetation:

- Proposed mitigation native and exotic treed vegetation shall be implemented at subdivision stage. This shall include those areas shown on the Covenant Vegetative Area Plan (McCracken Surveys, File Ref 13246, Sheet 1, Date July 2019).
- Vegetation cover shall be managed in perpetuity and shall be allow to grow to natural height and form.
- The LMP shall identify locations of the following planting schedule:

Planting Area	Species	Common Name	Height in 5 years	Mature Height
Main Boundary Planting	<i>Sequoia semperviren</i>	Californian Coastal Redwood	8.0m in 5yrs	15.0m
	<i>Thuja placate</i>	Western Red Cedar	4.0m in 5rs	30.0m
Intermittent Boundary Planting	<i>Fuscospora solandri</i>	Black Beech	3.0m in 5yrs	20.0m
	<i>Metrosideros excelsa</i>	Pohutukawa	3.0m in 5 years	10.0m
	<i>Agathis australis</i>	Kauri	3.0m in 5 years	40m
	<i>Leptospermum scoparium</i>	Manuka	2.0m in 5 years	4.0m
Sub Canopy Planting	<i>Pittosporum crassifolium</i>	Karo	7-10years – 5m	
	<i>Pittosporum eugenioides</i>	Lemonwood	7-10years – 6m	
	<i>Pittosporum tenuifolium</i>	Kohuhu	7-10years – 5m	

(Repeated) Table 1 – Proposed Tree Plantations

Buildings & Structures:

- **Building Areas:** Defined Building Areas (DFA) shall be identified in a final scheme plan that:
 - Locates the DFA in general accordance with the building areas shown in the proposed scheme plan.
 - DFA shall include all new buildings and structures, including sheds garden sheds, not precluding existing buildings and sheds.
- **Placement:** All buildings above ground must be located within the Building Areas as shown on the proposed scheme plan including ancillary buildings, garden sheds and above ground water tanks.
- **Height:** All buildings shall be single storey and a maximum height of 5m from natural ground level.
- **Watertanks:** All water tanks shall be screened from view in a manner and/or with screening and materials/colours harmonious with the dwelling and should be installed on each respective lot.

Form:

- Design roofs that integrate buildings into the landscape and use a sheltering form with deep overhangs of more than 1.0m.
- **Roofing:** Roof materials shall be colour in recessive colours no greater than a reflectance value of 20%. Grass or green roofing consistent with the surrounding vegetation patterns and colours is acceptable.
- Use building modulation to break the length of a building facade by changing direction, stepping in and out of the main facade, balconies, eaves, pergolas and other structures.
- Recess large areas of glazing below wide eaves and dividing glazing with walls, pergolas and the like.
- Use of dark tinted glass, but not mirror glazing, is required.
- Use window joinery, doors and balustrades that have a reflectance value of less than 30% and are dark or naturally coloured.
- Design buildings that use natural materials including natural stone, timber and concrete and cladding that has a reflectance value of less than 30% for walls and 25% for roofs.
- **Ancillary Buildings:** Garages, boat storage, and other ancillary buildings associated with the house shall be contained within the house site and shall be a comparable quality to that of the main building on the site.

Materials and Colour:

- Select materials that respond to the natural landscape and native vegetation immediately surrounding the subject site.
- Select colour palettes that have a reflectance value of less than 20% for roofs and 30% for walls (Refer to the Resene British Standard 5252 Range as a guide only. All colours and materials must be approved at building consent).
- Use natural material finishes such as stone and timber which will weather naturally.
- Apply dark oxide colouring to concrete materials to reduce reflectivity of the material.
- Timber cladding and other natural elements (stone) naturally weathered or stained dark.
- Painted timber, blockwork or other materials may be used and must contribute to receding the building into the landscape.
- The reflectance value of surfaces, including joinery, gutters, downpipes, cladding and roofing materials shall be no greater than 30% for walls and 25% for roofs.

Earthworks:

- No earthworks or grading other than the minimum required for driveways or underground services is permitted outside the house site area.
- Re-contouring all embankments surrounding driveways and building platforms into the natural landform to avoid visually exposed cut banks greater than 1.5m in height.
- All cut embankments, between 0.5m and 1.5m in height, shall be planted against to visually screen the exposed soil. Planting shall be organic in shape and form and avoid emphasising straight unnatural lines within the landscape.

Hard Surfaces

- Providing all driveways with flush kerb with either rip rap, grass or planted swales for stormwater management. Raised kerb and channels shall be avoided.
- Providing asphaltic concrete, dark coloured concrete or exposed aggregate concrete driveway surfaces.
- Impervious outdoor areas, including patio, outdoor entertainment areas and turning areas (within the driveway), all located within the Building Areas.

Fencing:

- Using post and 3 - 5 timber rail or post and wire fencing and vegetation to demarcate boundaries of properties to reflect the rural character of the wider area. Urban style post and panel and solid wall style fencing shall be avoided.
- Providing front gate fencing that is visually permeable including post and rail, stone pillars, brick or wrought iron.

Lighting and Utilities

- All exterior lighting should be contained within the Building Areas and shall be down lights only.
- All utilities and services shall be located below ground. No above ground wiring will be permitted. Aerials, satellite dishes and other utilities shall be maintained within the 6.0m building height plane.
- Downward facing bollard lighting is acceptable along the accessway corridor and to demarcate driveway entrances.
- Street lighting shall be avoided.
- Illuminated signage shall be avoided.

7.0 Conclusions

Overall the site provides an existing character which differs to the typical rural land uses that exist within this broader landscape. It offers a substantially treed landscape area which links to the parkland character of the adjoining Taitua Arboretum. The proposed subdivision has potential to introduce low to moderate adverse landscape effects upon the wider rural character, which can be suitably mitigated through the inclusion of design measures and management of building site locations.

The visual catchment is largely confined with potential short term adverse visual effects of a low to moderate nature for the adjoining properties along Stonebridge Road. Mitigation measures are recommended (Section 6.0) to minimise this effect through the implementation of the recommendation outcomes in a Landscape Management Plan. It is acknowledged that implementation of the mitigation planting along the eastern boundary has largely been implemented and over time as it establishes the visual effect on the adjoining properties will be reduced to a low level in the medium term (5 – 10 years).

Analysis against the District Plan demonstrates the different expectations of the rural zone to what occurs within the site and immediately surrounding the site. When assessed against these provisions the potential for adverse landscape and visual effects is of a low to moderate degree, equating to a minor adverse landscape effect. Therefore, the inclusion of the recommendations set out in Section 6.0, and the retention of the design as it is presented, this level of effect can be reduced a low degree. This translates (as set out in Appendix 1) as being a less than minor adverse effect.

Appendix 1: Landscape and Visual Effects Assessment Methodology

11 February 2019

Introduction

The Boffa Miskell Ltd Landscape and Visual Effects Assessment (LVA) process provides a framework for assessing and identifying the nature and level of likely effects that may result from a proposed development. Such effects can occur in relation to changes to physical elements, the existing character of the landscape and the experience of it. In addition, the landscape assessment method may include an iterative design development processes, which includes stakeholder involvement. The outcome of any assessment approach should seek to avoid, remedy or mitigate adverse effects (see **Figure 1**). A separate assessment is required to assess changes in natural character in coastal areas and other waterbodies.

This outline of the landscape and visual effects assessment methodology has been undertaken with reference to the **Quality Planning Landscape Guidance Note**⁷ and its signposts to examples of best practice, which include the **UK guidelines for landscape and visual impact assessment**⁸ and the **New Zealand Landscape Institute Guidelines for Landscape Assessment**⁹.

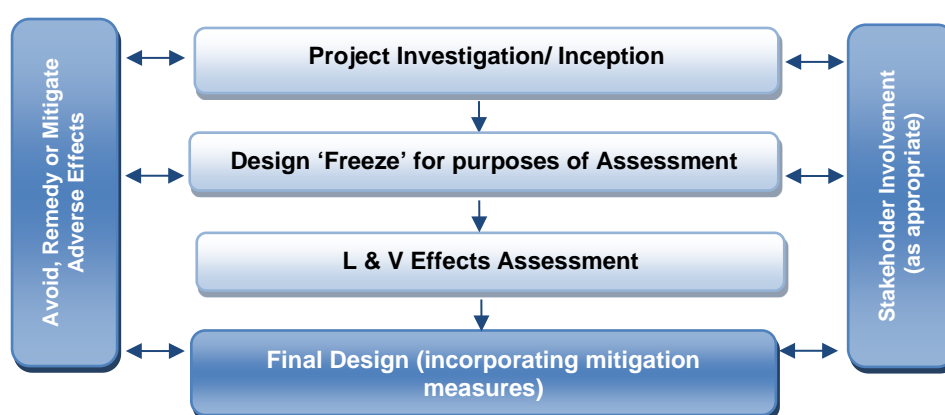


Figure 1: Design feedback loop

When undertaking a LVA, it is important that a **structured and consistent approach** is used to ensure that **findings are clear and objective**. Judgement should be based on skills and experience and be supported by explicit evidence and reasoned argument.

While landscape and visual effects assessments are closely related, they form separate procedures. The assessment of the potential effect on the landscape forms the first step in this process and is carried out as an effect on landscape elements, features and on landscape character. The assessment of visual effects considers how changes to the physical landscape affect the viewing audience. The types of effects can be summarised as follows:

Landscape effects: *Change in the physical landscape, which may affect its characteristics or qualities.*

Visual effects: *Change to views which may affect the visual amenity experienced by people.*

The policy context, existing landscape resource and locations from which a development or change is visible, all inform the 'baseline' for landscape and visual effects assessments. To assess effects, the landscape must first be **described**, including an understanding of the **key landscape characteristics and qualities**. This process,

⁷ <http://www.qualityplanning.org.nz/index.php/planning-tools/land/landscape>

⁸ Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)

⁹ Best Practice Note Landscape Assessment and Sustainable Management 10.1, NZILA

known as landscape characterisation, is the basic tool for understanding landscape character and may involve subdividing the landscape into character areas or types. The condition of the landscape (i.e. the state of an individual area of landscape or landscape feature) should also be described together with, a judgement made on the value or importance of the potentially affected landscape.

Landscape Effects

Assessing landscape effects requires an understanding of the landscape resource and the magnitude of change which results from a proposed activity to determine the overall level of landscape effects.

Landscape Resource

Assessing the sensitivity of the landscape resource considers the key characteristics and qualities. This involves an understanding of both the ability of an area of landscape to absorb change and the value of the landscape.

Ability of an area to absorb change

This will vary upon the following factors:

- Physical elements such as topography / hydrology / soils / vegetation;
- Existing land use;
- The pattern and scale of the landscape;
- Visual enclosure / openness of views and distribution of the viewing audience;
- The zoning of the land and its associated anticipated level of development;
- The scope for mitigation, appropriate to the existing landscape.

The ability of an area of landscape to absorb change takes account of both the attributes of the receiving environment and the characteristics of the proposed development. It considers the ability of a specific type of change occurring without generating adverse effects and/or achievement of landscape planning policies and strategies.

The value of the Landscape

Landscape value derives from the importance that people and communities, including tangata whenua, attach to particular landscapes and landscape attributes. This may include the classification of Outstanding Natural Feature or Landscape (ONFL) (RMA s.6(b)) based on important biophysical, sensory/ aesthetic and associative landscape attributes, which have potential to be affected by a proposed development. A landscape can have value even if it is not recognised as being an ONFL.

Magnitude of Landscape Change

The magnitude of landscape change judges the amount of change that is likely to occur to areas of landscape, landscape features, or key landscape attributes. In undertaking this assessment, it is important that the size or scale of the change is considered within the geographical extent of the area influenced and the duration of change, including whether the change is reversible. In some situations, the loss /change or enhancement to existing landscape elements such as vegetation or earthworks should also be quantified.

When assessing the level of landscape effects, it is important to be clear about what factors have been considered when making professional judgements. This can include consideration of any benefits which result from a proposed development. **Table 1** below helps to explain this process. The tabulating of effects is only intended to inform overall judgements.

Contributing Factors		Higher	Lower
Landscape (sensitivity)	Ability to absorb change	The landscape context has limited existing landscape detractors which make it highly vulnerable to the type of change resulting from the proposed development.	The landscape context has many detractors and can easily accommodate the proposed development without undue consequences to landscape character.
	The value of the landscape	The landscape includes important biophysical, sensory and shared and recognised attributes. The landscape requires protection as a matter of national importance (ONF/L).	The landscape lacks any important biophysical, sensory or shared and recognised attributes. The landscape is of low or local importance.

Magnitude of Change	Size or scale	Total loss or addition of key features or elements. Major changes in the key characteristics of the landscape, including significant aesthetic or perceptual elements.	The majority of key features or elements are retained. Key characteristics of the landscape remain intact with limited aesthetic or perceptual change apparent.
	Geographical extent	Wider landscape scale.	Site scale, immediate setting.
	Duration and reversibility	Permanent. Long term (over 10 years).	Reversible. Short Term (0-5 years).

Table 1: Determining the level of landscape effects

Visual Effects

To assess the visual effects of a proposed development on a landscape, a visual baseline must first be defined. The visual 'baseline' forms a technical exercise which identifies the area where the development may be visible, the potential viewing audience, and the key representative public viewpoints from which visual effects are assessed.

The viewing audience comprises the individuals or groups of people occupying or using the properties, roads, footpaths and public open spaces that lie within the visual envelope or 'zone of theoretical visibility (ZTV)' of the site and proposal. Where possible, computer modelling can assist to determine the theoretical extent of visibility together with field work to confirm this. Where appropriate, key representative viewpoints should be agreed with the relevant local authority.

The Sensitivity of the viewing audience

The sensitivity of the viewing audience is assessed in terms of assessing the likely response of the viewing audience to change and understanding the value attached to views.

Likely response of the viewing audience to change

Appraising the likely response of the viewing audience to change is determined by assessing the occupation or activity of people experiencing the view at particular locations and the extent to which their interest or activity may be focussed on views of the surrounding landscape. This relies on a landscape architect's judgement in respect of visual amenity and the reaction of people who may be affected by a proposal. This should also recognise that people more susceptible to change generally include: residents at home, people engaged in outdoor recreation whose attention or interest is likely to be focussed on the landscape and on particular views; visitors to heritage assets or other important visitor attractions; and communities where views contribute to the wider landscape setting.

Value attached to views

The value or importance attached to particular views may be determined with respect to its popularity or numbers of people affected or reference to planning instruments such as viewshafts or view corridors. Important viewpoints are also likely to appear in guide books or tourist maps and may include facilities provided for its enjoyment. There may also be references to this in literature or art, which also acknowledge a level of recognition and importance.

Magnitude of Visual Change

The assessment of visual effects also considers the potential magnitude of change which will result from views of a proposed development. This takes account of the size or scale of the effect, the geographical extent of views and the duration of visual change, which may distinguish between temporary (often associated with construction) and permanent effects where relevant. Preparation of any simulations of visual change to assist this process should be guided by best practice as identified by the NZILA¹⁰.

¹⁰ Best Practice Guide: Visual Simulations BPG 10.2, NZILA

When determining the overall level of visual effect, the nature of the viewing audience is considered together with the magnitude of change resulting from the proposed development. **Table 2** has been prepared to help guide this process:

Contributing Factors		Higher	Lower	Examples
The Viewing Audience (sensitivity)	Ability to absorb change	Views from dwellings and recreation areas where attention is typically focussed on the landscape.	Views from places of employment and other places where the focus is typically incidental to its landscape context. Views from transport corridors.	Dwellings, places of work, transport corridors, public tracks
	Value attached to views	Viewpoint is recognised by the community such as an important view shaft, identification on tourist maps or in art and literature. High visitor numbers.	Viewpoint is not typically recognised or valued by the community. Infrequent visitor numbers.	Acknowledged viewshafts, Lookouts
Magnitude of Change	Size or scale	Loss or addition of key features in the view. High degree of contrast with existing landscape elements (i.e. in terms of form scale, mass, line, height, colour and texture). Full view of the proposed development.	Most key features of views retained. Low degree of contrast with existing landscape elements (i.e. in terms of form scale, mass, line, height, colour and texture). Glimpse / no view of the proposed development.	- Higher contrast/ Lower contrast. - Open views, Partial views, Glimpse views (or filtered); No views (or obscured)
	Geographical extent	Front on views. Near distance views; Change visible across a wide area.	Oblique views. Long distance views. Small portion of change visible.	- Front or Oblique views. - Near distant, Middle distant and Long distant views
	Duration and reversibility	Permanent. Long term (over 15 years).	Transient / temporary. Short Term (0-5 years).	- Permanent (fixed), Transitory (moving)

Table 2: Determining the level of visual effects

Nature of Effects

In combination with assessing the level of effects, the landscape and visual effects assessment also considers the nature of effects in terms of whether this will be positive (beneficial) or negative (adverse) in the context within which it occurs. Neutral effects can also occur where landscape or visual change is benign.

It should also be noted that a change in a landscape does not, of itself, necessarily constitute an adverse landscape or visual effect. Landscape is dynamic and is constantly changing over time in both subtle and more dramatic transformational ways; these changes are both natural and human induced. What is important in managing landscape change is that adverse effects are avoided or sufficiently mitigated to ameliorate the effects of the change in land use. The aim is to provide a high amenity environment through appropriate design outcomes.

This assessment of the nature effects can be further guided by **Table 3** set out below:

Nature of effect	Use and Definition
Adverse (negative):	The activity would be out of scale with the landscape or at odds with the local pattern and landform which results in a reduction in landscape and / or visual amenity values
Neutral (benign):	The activity would be consistent with (or blend in with) the scale, landform and pattern of the landscape maintaining existing landscape and / or visual amenity values
Beneficial (positive):	The activity would enhance the landscape and / or visual amenity through removal or restoration of existing degraded landscape activities and / or addition of positive elements or features

Table 3: Determining the Nature of Effects

Cumulative Effects

During the scoping of an assessment, where appropriate, agreement should be reached with the relevant local authority as to the nature of cumulative effects to be assessed. This can include effects of the same type of development (e.g. wind farms) or the combined effect of all past, present and approved future development¹¹ of varying types, taking account of both the permitted baseline and receiving environment. Cumulative effects can also be positive, negative or benign.

Cumulative Landscape Effects

Cumulative landscape effects can include additional or combined changes in components of the landscape and changes in the overall landscape character. The extent within which cumulative landscape effects are assessed can cover the entire landscape character area within which the proposal is located, or alternatively, the zone of visual influence from which the proposal can be observed.

Cumulative Visual Effects

Cumulative visual effects can occur in combination (seen together in the same view), in succession (where the observer needs to turn their head) or sequentially (with a time lapse between instances where proposals are visible when moving through a landscape). Further visualisations may be required to indicate the change in view compared with the appearance of the project on its own.

Determining the nature and level of cumulative landscape and visual effects should adopt the same approach as the project assessment in describing both the nature of the viewing audience and magnitude of change leading to a final judgement. Mitigation may require broader consideration which may extend beyond the geographical extent of the project being assessed.

Determining the Overall Level of Effects

The landscape and visual effects assessment concludes with an overall assessment of the likely level of landscape and visual effects. This step also takes account of the nature of effects and the effectiveness of any proposed mitigation. The process can be illustrated in Figure 2:



Figure 2: Assessment process

This step informs an overall judgement identifying what level of effects are likely to be generated as indicated in **Table 4** below. This table which can be used to guide the level of landscape and visual effects uses an adapted seven-point scale derived from NZILA's Best Practice Note.

Effect Rating	Use and Definition
Very High:	Total loss of key elements / features / characteristics, i.e. amounts to a complete change of landscape character and in views.
High:	Major modification or loss of most key elements / features / characteristics, i.e. little of the pre-development landscape character remains and a major change in views. <i>Concise Oxford English Dictionary Definition</i> <i>High: adjective- Great in amount, value, size, or intensity.</i>
Moderate- High:	Modifications of several key elements / features / characteristics of the baseline, i.e. the pre-development landscape character remains evident but materially changed and prominent in views.

¹¹ The life of the statutory planning document or unimplemented resource consents.

Moderate:	Partial loss of or modification to key elements / features / characteristics of the baseline, i.e. new elements may be prominent in views but not necessarily uncharacteristic within the receiving landscape. <u>Concise Oxford English Dictionary Definition</u> <i>Moderate: adjective- average in amount, intensity, quality or degree</i>
Moderate - Low:	Minor loss of or modification to one or more key elements / features / characteristics, i.e. new elements are not prominent within views or uncharacteristic within the receiving landscape.
Low:	Little material loss of or modification to key elements / features / characteristics. i.e. modification or change is not uncharacteristic or prominent in views and absorbed within the receiving landscape. <u>Concise Oxford English Dictionary Definition</u> <i>Low: adjective- 1. Below average in amount, extent, or intensity.</i>
Very Low:	Negligible loss of or modification to key elements/ features/ characteristics of the baseline, i.e. approximating a 'no change' situation and a negligible change in views.

Table 4: Determining the overall level of landscape and visual effects

Determination of “minor”

Decision makers determining whether a resource consent application should be notified must also assess whether the effect on a person is less than minor¹² or an adverse effect on the environment is no more than minor¹³. Likewise, when assessing a non-complying activity, consent can only be granted if the s104D 'gateway test' is satisfied. This test requires the decision maker to be assured that the adverse effects of the activity on the environment will be 'minor' or not be contrary to the objectives and policies of the relevant planning documents.

These assessments will generally involve a broader consideration of the effects of the activity, beyond the landscape and visual effects. Through this broader consideration, guidance may be sought on whether the likely effects on the landscape or effects on a person are considered in relation to 'minor'. It must also be stressed that more than minor effects on individual elements or viewpoints does not necessarily equate to more than minor effects on the wider landscape. In relation to this assessment, moderate-low level effects would generally equate to 'minor'.

The third row highlights the word 'significant' which has particular reference to the NZCPS and Policy 13 and Policy 15 and where on the effects-spectrum 'a significant' effect would be placed.

<u>Less than Minor</u>		<u>Minor</u>	<u>More than Minor</u>			
Very Low	Low	Moderate – Low	Moderate	Moderate-High	High	Very High
					Significant ¹⁴	

Table 5: Determining minor effects for notification determination and non-complying activities

¹² RMA, Section 95E

¹³ RMA Section 95D

¹⁴ To be used only about Policy 13(1)(b) and Policy 15(b) of the New Zealand Coastal Policy Statement (NZCPS), where the test is 'to avoid significant adverse effects'.

Appendix 2: Statutory Analysis of Relevant Planning Provisions

635 Whatawhata Road Subdivision – Landscape and Visual Impact Assessment: Relevant Planning Provisions

Waikato Regional Policy Statement

Topic	Provision
<i>Objective 3.12 Built Environment</i>	<p>Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:</p> <ul style="list-style-type: none"> a) promoting positive indigenous biodiversity outcomes; b) preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development; c) integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors; d) integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth; e) recognising and protecting the value and long-term benefits of regionally significant infrastructure; f) protecting access to identified significant mineral resources; g) minimising land use conflicts, including minimising potential for reverse sensitivity; h) anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region; i) providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation; j) promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and k) providing for a range of commercial development to support the social and economic wellbeing of the region.
<i>Objective 3.21 Amenity</i>	<p>The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced.</p>

635 Whatawhata Road Subdivision – Landscape and Visual Impact Assessment: Relevant Planning Provisions

<i>Objective 3.22 Natural character</i>	The natural character of the coastal environment, wetlands, and lakes and rivers and their margins are protected from the adverse effects of inappropriate subdivision, use and development.
<i>Policy 6.1: Planned and co-ordinated subdivision, use and development</i>	<p>Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:</p> <ul style="list-style-type: none"> a) has regard to the principles in section 6A; b) recognises and addresses potential cumulative effects of subdivision, use and development; c) is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and d) has regard to the existing built environment.
<i>Principles specific to rural-residential development</i>	<p>As well as being subject to the general development principles, new rural-residential development should:</p> <ul style="list-style-type: none"> a) be more strongly controlled where demand is high; b) not conflict with foreseeable long-term needs for expansion of existing urban centres; c) avoid open landscapes largely free of urban and rural-residential development; d) avoid ribbon development and, where practicable, the need for additional access points and upgrades, along significant transport corridors and other arterial routes; e) recognise the advantages of reducing fuel consumption by locating near employment centres or near current or likely future public transport routes; f) minimise visual effects and effects on rural character such as through locating development within appropriate topography and through landscaping; g) be capable of being serviced by onsite water and wastewater services unless services are to be reticulated; and h) be recognised as a potential method for protecting sensitive areas such as small water bodies, gully-systems and areas of indigenous biodiversity.

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Operative Waikato District Plan Provisions

1A.8 Issue - Rural Character and Amenity Values

The continued modification of the rural environment through subdivision, use and development can adversely affect their natural and physical qualities and character. These qualities and character are important in maintaining investment in rural activities and providing a context for the development of towns and villages.

OBJECTIVES	POLICIES
IA.8.1 Landscape, character and amenity values of rural areas are maintained.	IA.8.2 Activities that do not have a functional need to establish in rural areas should be accommodated in towns, villages and defined growth areas. IA.8.3 The expansion of towns, villages and <u>defined growth areas</u> should occur in a manner that minimises the potential for conflicts with the surrounding rural area. IA.8.4 Provision should be made for limited <u>subdivision</u> where this protects and manages in perpetuity land or features of ecological, cultural, heritage, recreational, access or landscape value to the wider community. IA.8.5 <u>Subdivision</u> , use and development in rural areas should be managed so that a range of lifestyle choices is available while ensuring that rural landscapes and Rural Character are retained. IA.8.6 <u>Subdivision</u> , use and development in rural areas that have been modified through development should be managed to ensure that cumulative adverse effects do not compromise rural landscapes and Rural Character . IA.8.7 Rural landscapes, Rural Character and associated amenity values should be retained by ensuring allotments are of sufficient size for rural land uses to predominate in rural areas.

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13.6 Issue – Rural Character

Subdivision or development can adversely affect Rural Character where it is of a density, scale, intensity or location that is inappropriate to the locality.

OBJECTIVE	POLICIES
<p>13.6.1 Rural Character is preserved.</p>	<p>13.6.2 Rural subdivision and development should be of a density, scale, intensity and location to retain or enhance Rural Character, including:</p> <ul style="list-style-type: none"> (aa) a predominance of natural features over built features (a) a very high ratio of open space in relation to areas covered by buildings (b) open space areas in pasture, trees, crops or indigenous vegetation (c) tracts of unmodified natural features, indigenous vegetation, streams, rivers, wetlands and ponds (d) large numbers of farm animals and wildlife (e) noises, smells and sights of farming, horticultural and forestry uses (f) post and wire fences, purpose-built farm buildings, and scattered dwellings (fa) low population density (g) generally narrow carriageways within wide road reserves, often unsealed with open drains, low-speed geometry and low traffic volumes (h) a general absence of urban-scale and urban-type infrastructure such as roads with kerb and channel, footpaths, mown berms, street lights, advertising signs, sealed and demarcated parking areas, decorative fences and gateways (i) a diversity of lot sizes and shapes, related to the character and pattern of the landscape. <p>While recognising that mineral extraction activities are of a different scale and intensity, and where appropriate should be accommodated.</p> <p>13.6.3 Rural land should be retained in large holdings sufficient in size to enable productive rural activities to occur; and the creation of large holdings encouraged and where appropriate boundary relocations should be encouraged that facilitate holdings of sufficient size to support these activities.</p> <p>13.6.4 Allotments created by subdivision should be of a shape and sufficient size to retain the Rural Character of the area by ensuring they are large enough for rural land uses to predominate.</p>

OBJECTIVE	POLICIES
<p>13.6.5 The cumulative adverse effects of subdivision or development on Rural Character and amenity values are avoided.</p>	<p>13.6.6 Rural Character should be maintained and the cumulative adverse effects of subdivision should be avoided.</p> <p>13.6.7 Repeated subdivision of rural land that results in additional lots must be avoided.</p> <p>13.6.8 Rural Character should be retained by avoiding the incremental expansion of areas where compromise has already occurred.</p> <p>13.6.9 Subdivision, use and development should not further compromise Rural Character in rural areas already modified by non-rural activities.</p> <p>13.6.10 Subdivision, use and development of rural land composed principally of small land holdings should be managed to retain Rural Character by ensuring allotments are of sufficient size for rural land uses to predominate in these areas.</p>

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Proposed Waikato District Plan Provisions

<p><u>Chapter 5: Rural Environment</u></p> <p>5.1 The Rural Environment</p>	<p><i>5.1.1 Objective – The rural environment</i></p> <p>Objective 5.1.1 is the strategic objective for the rural environment and has primacy over all other objectives in Chapter 5.</p> <ul style="list-style-type: none"> a) Subdivision, use and development within the rural environment where: <ul style="list-style-type: none"> i. high class soils are protected for productive rural activities; ii. productive rural activities are supported, while maintaining or enhancing the rural environment; iii. urban subdivision, use and development in the rural environment is avoided.
<p><u>Chapter 5: Rural Environment</u></p> <p>5.2 Productive Versatility of Rural Resources</p>	<p><i>5.2.1 Objective - Rural resources</i></p> <ul style="list-style-type: none"> a) Maintain or enhance the: <ul style="list-style-type: none"> i. Inherent life-supporting capacity and versatility of soils, in particular high class soils; ii. The health and wellbeing of rural land and natural ecosystems; iii. The quality of surface fresh water and ground water, including their catchments and connections; iv. Life-supporting and intrinsic natural characteristics of water bodies and coastal waters and the catchments between them.
	<p><i>5.2.3 Policy - Effects of subdivision and development on soils</i></p> <p>Subdivision, use and development minimises the fragmentation of productive rural land, particularly where high class soils are located.</p> <p>Subdivision which provides a range of lifestyle options is directed away from high class soils and/ or where indigenous biodiversity is being protected.</p>
	<p><i>5.2.3 Policy - Effects of subdivision and development on soils</i></p>

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	<p>Subdivision, use and development minimises the fragmentation of productive rural land, particularly where high class soils are located.</p> <p>Subdivision which provides a range of lifestyle options is directed away from high class soils and/ or where indigenous biodiversity is being protected.</p>
<i>5.3 Rural Character and Amenity</i>	<p><i>5.3.1 Objective - Rural character and amenity</i></p> <p>Rural character and amenity are maintained.</p>
	<p><i>5.3.2 Policy - Productive rural activities</i></p> <p>a) Recognise and protect the continued operation of the rural environment as a productive working environment by:</p> <ul style="list-style-type: none"> i. Recognising that buildings and structures associated with farming and forestry and other operational structures for productive rural activities contribute to rural character and amenity values; ii. Ensuring productive rural activities are supported by appropriate rural industries and services; iii. Providing for lawfully-established rural activities and protecting them from sensitive land uses.
	<p><i>5.3.4 Policy - Density of dwellings and buildings within the rural environment</i></p> <p>Retain open spaces to ensure rural character is maintained.</p> <p>Additional dwellings support workers' accommodation for large productive rural activities.</p>
	<p><i>5.3.5 Policy – Earthworks activities</i></p> <p>a) Provide for earthworks where they support rural activities including:</p>

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	<ul style="list-style-type: none"> i. Ancillary rural earthworks and farm quarries; ii. The importation of fill material to a site; iii. Use of cleanfill where it assists the rehabilitation of quarries. <p>b) Manage the effects of earthworks to ensure that:</p> <ul style="list-style-type: none"> i. Erosion and sediment loss are avoided or mitigated; ii. The ground is geotechnically sound and remains safe and stable for the duration of the intended land use; iii. Changes to natural water flows and established drainage paths are avoided or mitigated; iv. Adjoining properties and public services are protected.
	<p><i>5.3.7 Policy - Reverse sensitivity effects</i></p> <p>a) Recognise the following features are typical of the rural environment and the effects are accepted and able to be managed:</p> <ul style="list-style-type: none"> i. Large numbers of animals being farmed, extensive areas of plants, vines or fruit crops, plantation forests and farm forests; ii. Noise, odour, dust, traffic and visual effects associated with the use of land for farming, horticulture, forestry, farm quarries; iii. (Existing mineral extraction and processing activities; iv. Minor dwellings; v. Papakaainga housing developments within Maaori Freehold land. <p>b) Avoid adverse effects outside the site and where those effects cannot be avoided, they are to be mitigated.</p> <p>c) Mitigate the adverse effects of reverse sensitivity through the use of setbacks and the design of subdivisions and development.</p> <p>d) The scale, intensity, timing and duration of activities are managed to ensure compatibility with the amenity and character of the rural environment.</p> <p>e) Enable the use of artificial outdoor lighting for night time work.</p> <p>f) Ensure glare and light spill from artificial lighting in the rural environment does not:</p> <ul style="list-style-type: none"> i. Compromise the safe operation of the road transport network; and ii. Detract from the amenity of other sites within the surrounding environment.

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	<ul style="list-style-type: none"> g) Frost fans are located and operated to ensure adverse effects on the surrounding environment are minimised. h) Provide for intensive farming activities, recognising the potential adverse effects that need to be managed, including noise, visual amenity, rural character or landscape effects, and odour.
	<p><i>5.3.8 Policy - Effects on rural character and amenity from rural subdivision</i></p> <ul style="list-style-type: none"> a) Protect productive rural areas by directing urban forms of subdivision, use, and development to within the boundaries of towns and villages. b) Ensure development does not compromise the predominant open space, character and amenity of rural areas. c) Ensure subdivision, use and development minimise the effects of ribbon development. d) Rural hamlet subdivision and boundary relocations ensure the following: <ul style="list-style-type: none"> i. Protection of rural land for productive purposes; ii. Maintenance of the rural character and amenity of the surrounding rural environment; iii. Minimisation of cumulative effects. e) Subdivision, use and development opportunities ensure that rural character and amenity values are maintained. f) Subdivision, use and development ensures the effects on public infrastructure are minimised.
	<p><i>5.3.9 Policy - Non-rural activities</i></p> <p>Manage any non-rural activities, including equestrian centres, horse training centres, forestry and rural industries, to achieve a character, scale, intensity and location that are in keeping with rural character and amenity values.</p> <p>Avoid buildings and structures dominating land on adjoining properties, public reserves, the coast or waterbodies.</p>

Appendix 3: Waikato Regional Landscape Assessment (Environment Waikato Technical Report 2010/12)

3.4 Waikato Lowlands

The Waikato Lowlands are flat and low lying in contrast with the surrounding hill country. They comprise pasture, hedges, groups of both exotic and indigenous trees, and has a well maintained and developed landscape character.

The Waikato River is the central feature in this landscape, with Hamilton as the main city.

There are a large number of remnant peat lakes and swamps in the lowlands, such as the Rukuhia and Moanatuatua swamps, Opuatia wetland and the Whangamarino wetland which is internationally recognised by the Ramsar Convention. The undeveloped parts of these peat lands have a range of values including botanical and wildlife habitat, flood control, scientific and aesthetic values.

Lake Waikare and a number of other lakes are located adjacent to Huntly and Te Kauwhata. There are also a number of peat lakes closely associated with the State Highway 3 corridor between Hamilton and Te Awamutu. They lie on the flat land at the base of the State Highway 3 ridge.

The peat lakes are highly valued ecologically and are surrounded by raupo and flax, and willows in places. There are also groups of kahikatea in the pasture surrounding them. The combination of lake and wetland fringe gives these lakes very high natural character values. The surroundings to these lakes are highly sensitive to change.

In general, the land use comprises market gardening, fruit growing, arable farming, cattle and dairy farms, stud farms and racing stables.

The main pressure on this area is the demand for residential homes in a rural setting – i.e. rural residential development, particularly given the large nearby populations of Auckland and Hamilton. State Highway One runs along beside the Waikato River, and two 200 kV lines cross the Waikato River north east of Hamilton.

There are coal deposits between Pukekohe and Huntly.

Appendix 4: Application Scheme Plan, Vegetation Covenant Plan and Correspondence



13246

Proposed Easements

Purpose	Shown	Burdened Land	Benefitted Land
Right of way & Right to convey Water, Electricity, Gas, Computer Media & Telecommunications & right to Drain Water & Sewage.	A	Lot 10 hereon	Lots 1 to 7 hereon
	B	Lot 10 hereon	Lots 3 to 7 hereon
	C	Lot 10 hereon	Lots 5 to 7 hereon
	D	Lot 10 hereon	Lot 6 hereon
	E	Lot 10 hereon	Lots 3 hereon
Right to convey Water	F	Lot 2 hereon	Lot 10 hereon
Right to convey Electricity	G	Lot 8 hereon	Lots 9 & 10 hereon

Key
P - Pond



Area within which buildings/structure dwellings can be constructed.



100-year Flooding Level

Contours - Waikato Regional LIDAR Service 2007 (WRLS 2007). LIDAR data sourced from Environment Waikato. COPYRIGHT RESERVED.

Contour Interval
Major Contour = 5m
Minor Contour = 0.5m

Aerial Photo is collected in February 2018.

Note: The Building Envelope within the land shown is all the land excluding the building setbacks specified in the Waikato District Plan.

Note: Areas & dimensions are subject to survey.

Zone: Rural Zone
Total Area: 45.6686 Ha.
Comprised in: SA10B/683 & SA10B/682
Registered Owner(s): G. & S. Singleton Heritage Ltd.

I, David Vernon McCracken, Registered Professional Surveyor, do hereby certify that this plan has been prepared by me for a Resource Consent under the provisions of the Resource Management Act 1991 and should not be used for any other purpose.

DVMcCracken

09/09/2019

Registered Professional Surveyor

Date

Amendments

No	Activity	Date

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cheal



Proposed Subdivision of Lots 1 & 2 DPS 12627
635 Whatawhata Road, Dinsdale.

Prepared for: G. & S. Singleton Heritage Ltd.			Sheet 1
Drawn HC	Checked	Scales	Series of 8
Traced	Date Sep. 2019	1:4000 A2	File Ref 13246



13246

Key
P - Pond

100-year Flooding Level
Covenant Vegetative Area

Aerial Photo is collected in February 2018.

Note: The Building Envelope within the land shown is all the land excluding the building setbacks specified in the Waikato District Plan.

Note: Areas & dimensions are subject to survey.

Zone: Rural Zone
Total Area: 45.6686 Ha.
Comprised in: SA10B/683 & SA10B/682
Registered Owner(s): G. & S. Singleton Heritage Ltd.

I, David Vernon McCracken, Registered Professional Surveyor, do hereby certify that this plan has been prepared by me for a Resource Consent under the provisions of the Resource Management Act 1991 and should not be used for any other purpose.

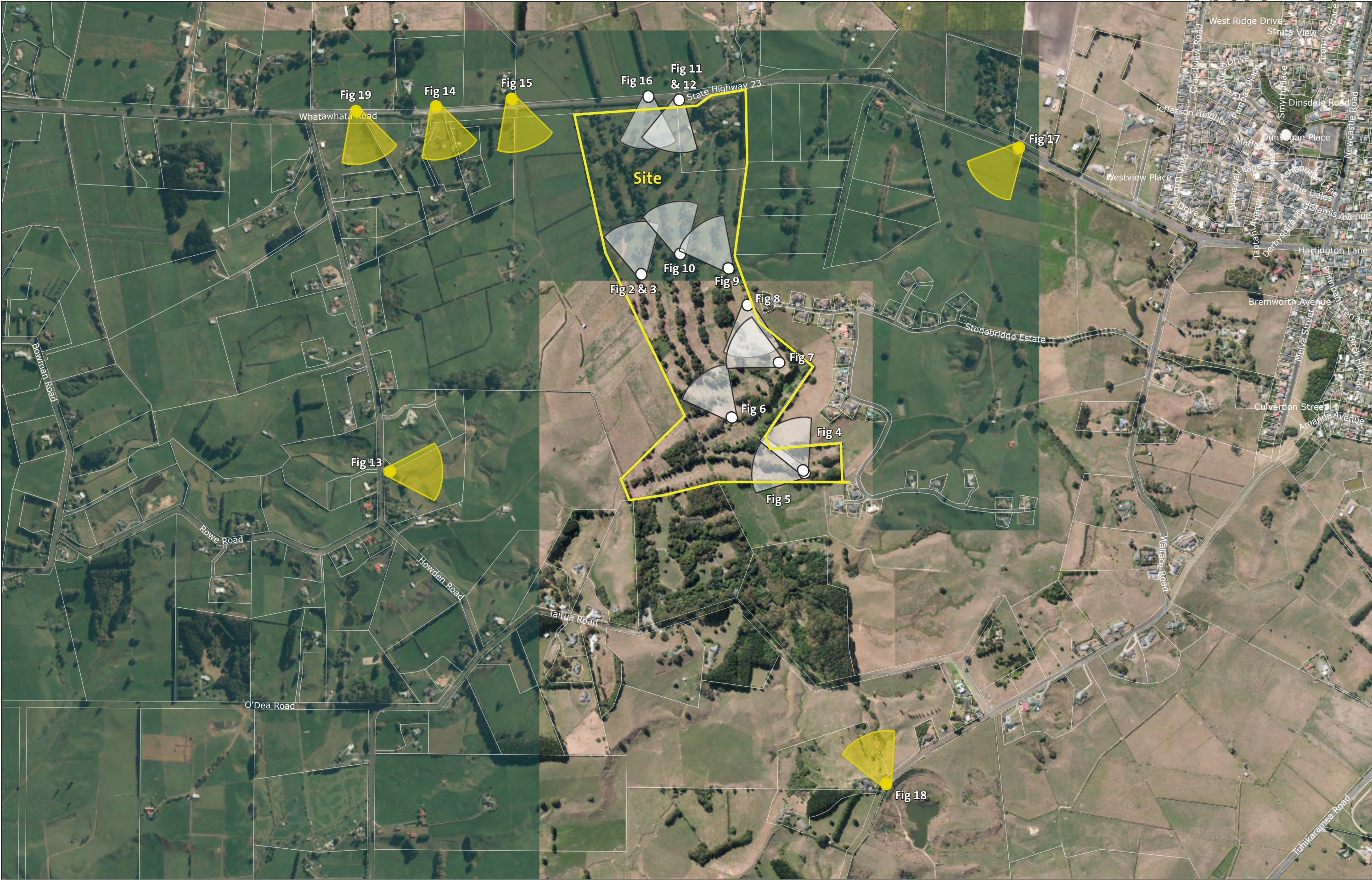
Registered Professional Surveyor _____ Date _____

Amendments

No	Activity	Date

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Appendix 5: Visual Analysis







































Appendix 6: Preliminary Landscape Opinion

From: Rebecca Ryder
Sent: 5 Jul 2019 08:48:10 +1200
To: Cameron Aplin
Subject: FW: 635 Whatawhata Road Subdivision, Preliminary Landscape Opinion

Hi Cameron

During our site visit on Tuesday the 25th of June 2019 I observed the proposed 10 lot subdivision within the old grounds of a golf course at 638 Whatawhata Road. I observed both well established and newly established tree and riparian planting throughout the site and was taken to each of the house sites. The subject site adjoins an existing farm park cluster housing estate (Stonebridge) to the east, accessed off Wallace Road. To the south the Taitua Arboretum adjoins the south western corner of the site. The remaining boundaries are bounded by rural farmland to the west and north of the site.

In order to develop a preliminary opinion on matters I visited the surrounding rural landscape to observe the site from its wider visual catchment and develop an understanding of the rural landscape.

The baseline permitted activity for the site enables subdivision to create one additional lot. The proposed application seeks to create eight additional lots from two existing titles. The site itself has a unique character and placement within the rural landscape that distinguishes it from atypical pastoral rural plains landscape. Similar clusters of rural housing are found along the ridgeline of Bowden Road with the plains between the ridgelines remaining largely open pastoral fields. The site has been modified for some time and presents itself more like a parkland than a productive rural plains landscape and is sited at the toe of a ridgeline to the east.

The applicant has detailed their intentions to develop further planting to effectively surround the site in canopy cover. Visually this will create screening that whilst helpful isn't all necessary to *mitigate* a visual effect. The primary matter here is rural character and whether the eight additional lots detract from the rural character of the area.

In my view the site with its unique characteristics has capacity to accommodate more rural housing within it than its adjoining pastoral plains landscape, given its unique character, placement both locally and wider.

I consider visual effects can be appropriately mitigated and consider there are some matters where the rural character may need further consideration through the design:

1. I consider the existing and longstanding character of the historic golf course introduces a different element within the rural landscape and should be considered as part of the rural character baseline. I do not consider this is merely a number of house site but how they integrate into this unique site and the surrounding landscape.
2. I support the placement of lots 1, 8 and 9 in regard to their placement and separation between lot 1 and 8 and 9. This balances the open space that resides immediately to the east and west of this area of the site.

3. The spatial distribution of Lots 1,2,3,4,5 and 10 are in a tighter grouping and are separated by both elevation and vegetation. Their distance from the western boundary is an important element in integrating these house sites into the landscape.
4. Lots 6 and 7 are separated from the clustering of the other house sites and reside at the gully interface between the site and adjoining land. I am concerned with the placement of Lot 7 and consider this could be an area that could remain as rural land or reconsider the house site placement .
5. Lot 6 is sited in an area which provides a rural landscape area that forms a gully area between pockets of housing within the adjoining farm park cluster. I am of the view that this house site may need re positioning or removal from the scheme. To retain the aesthetic coherence between buildings and landscape patterns in the local and wider landscape.
6. House sites 2 and 10 have an immediate visual connection to a nearby residence to the immediate east. There will be visual effects matters that will require some visual mitigation here.
7. In discussion with the applicant I raised the matter of considering design controls for building and site development for each house site. It appears to be inherently expected by the applicant and in order to ensure the rural character is integrated with I consider a set of building and site design controls should be included. This can be included in the LVA report.
8. A part of an application a landscape mitigation plan should specifically identify which plant / tree groupings are required for visual and landscape mitigation. This should not include ALL planting within the site but that which is critical to the proposal and its integration. It is acknowledged that some established planting within the site will either fall or require replacement. Understanding which species are critical to the application will assist in monitoring.

Overall I consider the proposal will be able to integrate into the rural landscape but consider there are some design changes in the scheme layout that would require some further discussion or consideration by the applicant.

I trust this assists and will await a response before I proceed any further with an LVA report to enable the applicant to consider the above matters.

Kind Regards
Rebecca



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