



## Introduction

---

- 1 In consultation with representatives of the Residents for Responsible Development Cromwell group on the proposed Plan Change 14 application following the hearing, the proposed Structure Plan has been revised, refer to Rev A (dated 14 July 2020).
- 2 Amendments to the Structure Plan include:
  - (a) Addition of Rural Lifestyle Area 6 (RLA6), a new rural lifestyle type with a minimum lot size of 4 hectares, located adjacent to Ripponvale Road, for the primary purpose of productive land use.
  - (b) In association with the addition of RLA6 along the south site boundary, the extent of RLA2 (3000m<sup>2</sup> minimum) and RLA4 (1 hectare minimum) areas within the south part of the site have been reduced and a small area of 'Indicative Open Space and Stormwater Corridor', associated with an existing irrigation pond, has been removed.
  - (c) The 'Amenity Edge' along the south site boundary has been removed from the Structure Plan adjacent to RLA6.
  - (d) The area of RLA1 (2000m<sup>2</sup> minimum) within the core of the site has been increased to encompass all the land within the loop road and an increased area east of the loop road.
  - (e) A new area of RLA2 has been introduced immediately north of the loop road on the lower slopes of the 'Farmland Terrace' outside the SAL.
- 3 Considering these amendments to the PC14 proposed Structure Plan, I provide the following comments regarding the landscape and visual effects of the proposed plan change.

## Evidence in Reply

---

### *Landscape Effects on Rural Character & Amenity within the Development*

- 4 The following discussion is focused on any change in landscape character as experienced within the site, as a result of the Structure Plan amendments outlined above.
- 5 In the Landscape and Visual Amenity Assessment (dated 20 May 2019) at section 6.2.4, I have described the effects of the proposed plan change on the landscape character and quality of the application site. As per both the previous and amended versions of the Structure Plan, the proposal will modify the rural character of the application site, changing it from a working rural farm to a rural living development.

I consider this change to be acceptable within the application site and surrounding rural context and I consider the Structure Plan amendments to be in keeping with a rural living character.

- 6 The introduction of the RLA6 area for the purpose of productive land use along the south boundary, in place of 1-hectare lots as were proposed on the previous iteration of the Structure Plan, will increase rural amenity as experienced by users of Ripponvale Road and adjacent properties both within and outside the application site. This amendment will also enhance the rural amenity experienced as users enter the application site through the productive land.
- 7 While an increase in density at the core of the site has been proposed, through expansion of RLA1, these lots will be located adjacent to the proposed RLA6 and open space / stormwater corridor, as shown on the Indicative Master Plan Rev B (dated 22 July 2020). As such, a majority of the lots within the core of the site will maintain an outlook and connection to productive land uses and open space that will enhance the rural character and amenity experienced by residents of these lots and users of the 'roadscape' and open space network.
- 8 To the north of the loop road, a new area of RLA2 has been introduced on the lower slopes of the 'Farmland Terrace'. This increase in density of the lower 'Farmland Terrace' contributes to a more blended transition across the RLAs. In the previous version of the Structure Plan and Indicative Master Plan (26 May), the smaller lots sizes (RLA1 and 2) were contained to the flat core of the site with medium (RLA3) lots on the terraces and large lots (RLA4 and 5) on the slopes/SAL. The expansion of the RLA1 and addition of the north RLA2 has extended the concentration of smaller lots from the flats onto the lower slopes of the 'Farmland Terrace'.
- 9 The increase in density on the 'Farmland Terrace' between the stormwater corridor and SAL includes 1.97 ha of RLA1 and 3.97 ha of RLA2. This area, a total of 5.94 ha, was included within RLA3 in the previous iteration of the Structure Plan and Indicative Master Plan. Based on area, this would accommodate 14 lots of 4000 sq m (RLA3). The amended Structure Plan and Indicative Master Plan in its current layout, allow for 9 lots of 2000 sq m (RLA1) and 13 lots of 3000 sq m (RLA2). This demonstrates a total increase of eight allotments, depending on subdivision layout.

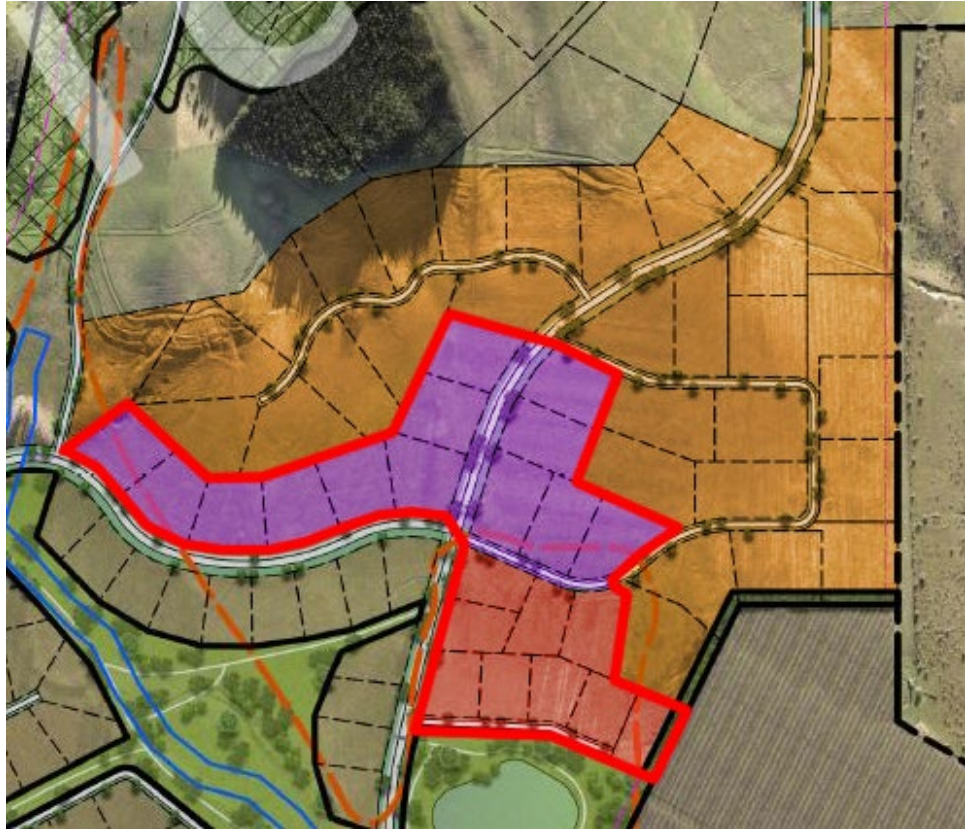


Figure 1: 22 July Indicative Master Plan RLA1, 2, and 3 Lots on the Farmland Terrace

- 10 On the whole, this increase of approximately eight lots and the associated increase in density in this area of the site, is not viewed as a significant change in the context of the overall scale of the proposal, and as the proposed elements are of a rural character (rural roading, materials, colour, built-form, etc.), the development will still deliver a rural outcome.

*Visual Amenity Effects on Ripponvale Road*

- 11 The following discussion is focused on any change in the visual amenity as experienced by users of Ripponvale Road, with a particular focus on the Structure Plan amendments which relate to the Ripponvale Road frontage.
- 12 As described previously, the revised Structure Plan includes a new rural lifestyle type, RLA6, located adjacent to Ripponvale Road, to enable a greater extent of productive land uses in this location. The addition of this area has reduced the extent of RLA2 and RLA4 within the south part of the site and has increased the distance of the majority of dwellings from Ripponvale Road. At the junction of the north-south and east-west limbs of Ripponvale Road, RLA2 and RLA4 are setback at approximately 100 metres from Ripponvale Road and the private drive to the west. Within RLA6 a built form setback of 80 metres from the Rockburn site has been proposed. In addition to this, it is proposed that the shelterbelt along the south

length of the private drive be retained to provide mitigation of potential reverse sensitivity effects for adjacent properties.

- 13 From the east-west limb of Ripponvale Road along the south boundary of the site, RLA1 is setback approximately 240 metres from Ripponvale Road. The 'Amenity Edge' which was to be a planted frontage has not been included on the revised Structure Plan as it was considered that the introduction of a productive use on the land adjacent to Ripponvale Road would provide an appropriate level of amenity for users of Ripponvale Road. However, I consider that maintaining a planted 'Amenity Edge' along the Ripponvale Road boundary in conjunction with the productive land use within RLA6 would afford a better outcome and thus should be added back to the Structure Plan.
- 14 Regarding visual amenity effects as experienced from the north-south limb of Ripponvale Road (viewpoints 1 and 4 in the GS-E), I do not consider the changes associated with the amended Structure Plan will constitute any notable visual change from the previous version of the Structure Plan.
- 15 In views from the east-west limb of Ripponvale Road (viewpoints 11 and 12 in the GS-E), I consider that the amendments are positive in that a productive land use occupies the land closer to the road and built form will be setback a greater distance from Ripponvale Road.
- 16 The removal of the tree lined 'Amenity Edge' from the previous iteration of the Structure Plan, will allow longer views across the site and, as a result, development particularly on the 'Farmland Terrace' and within the SAL, will be more visible than in the previous version of the Structure Plan. Thus, I am of the opinion that the 'Amenity Edge' should be added back to the Structure Plan.
- 17 I consider the amendments, on balance, to be consistent with my original effects rating assessment for these viewpoints (11 and 12) and adverse effects on visual amenity as experienced from Ripponvale Road will be moderate, attributed primarily to the increased visibility of the development. I maintain the opinion that while the view will change from the current view, this change will not be at odds with the surrounding environment and will not result in a lower level of visual amenity than at present.

*Visual Amenity Effects Resulting from Increase of Density between the Stormwater Corridor and SAL*

- 18 As described previously, the amended Structure Plan incorporates an increase in density within the core of the site through expansion of the RLA1 area and addition of a new RLA2 area north of the loop road on the lower slopes of the 'Farmland Terrace'.

- 19 In regard to visual amenity, the increased density within the core of the site and on the lower slopes of the 'Farmland Terrace' as compared to the previous version of the Structure Plan, will be noticeable to a small degree in views close to the application site, from the east-west limb of Ripponvale Road and the Cromwell Racecourse. I consider that visual amenity effects resulting from the increase of density on the lower slopes of the 'Farmland Terrace' are largely offset by the presence of increased productive land uses along the south site boundary and the increased setback of built form.
- 20 In the context of more distant views, given the increase in density is a small change in the context of the wider development. I do not anticipate this change will be readily noticeable in longer views.

### **Matters Raised in Supplementary Section 42A Report**

---

- 21 The following comments are made in response to matters raised in the Supplementary Section 42A Report dated 1 September 2020 and address Mr Whitney's comments regarding:
- (a) Visibility of the site from the Aerial Viewpoint Visual Simulation.
  - (b) Visual effects of the proposal from Viewpoint 15.
  - (c) Representation of Ripponvale Road Visual Simulations.
  - (d) Section 42A Landscape Conclusion
  - (e) Matters Raised by Mr. Espie's Supplementary Landscape Review Comments.

#### *Aerial Viewpoint Visual Simulation*

- 22 In section 5.3 on page 5 of Mr Whitney's supplementary report, he notes that the aerial viewpoint will be available to users of the Cromwell Aerodrome and scenic flights based from Heliview Flights on Ord Road. I am in agreement that this view will be available to those looking down on the site from local aircraft but do not consider it likely that the typical user of the Ripponvale nor the wider Cromwell area will experience this view. Further, for those that will utilise these services and have views of the site from above, the site will be experienced in the context of the Pisa Range, Lake Dunstan, Cromwell township and the patchwork of agricultural, horticultural and rural residential activities within the Ripponvale area.

#### *Viewpoint 15*

- 23 On page 6, Mr Whitney's comments on the significance of Viewpoint 15 as a public viewpoint and considers it regrettable that a visual simulation was not prepared for

this viewpoint. I do not agree. Rather, I consider that Viewpoint 14 from the Cromwell Racecourse, is largely comparable to Viewpoint 15 in terms of the visibility of the site, and that Viewpoint 14 was preferred for preparation of a visual simulation as it is located closer to the site by approximately 620 metres and has a more direct angle and unobstructed view of the proposed development. As described in my Addendum dated 23 July 2020, the Viewpoints selected for preparation of visual simulations were selected to represent a range of viewing distances from unobstructed viewpoint locations, thus Viewpoint 14 was a logical choice.

- 24 Regarding the visual effects of the 14 July amendments to the Structure Plan and 22 July amendments to the Indicative Master Plan, as experienced from Viewpoint 15, I have already addressed the visual amenity effects associated with an increase in density on the lower slopes and the addition of horticultural / viticultural on the flats. I do not consider the addition of eight more lots on the lower 'Farmland Terrace' slopes to constitute a significant change from what was previously proposed, though a slight increase in density on the lower slopes may be noticeable to a small degree from this viewpoint. As such my findings for the rating of visual amenity effects from this viewpoint remain unchanged from that described in my Evidence in Chief.

#### *Representation of Visual Simulations*

- 25 In response to Mr Whitney's comments regarding the representation of the proposal in the visual simulations, in particular the lack of farm buildings and water tanks and representation of the productive land, I consider that the Indicative Master Plan and Visual Simulations are representative of one outcome for the site and that the proposed provisions and Structure Plan provide opportunities for various development layouts. For the purpose of relating the degree of visibility, structure and character of the proposal, I consider the visual simulations to be a reasonable representation of a possible development outcome for the property.
- 26 With regard to the representation of the RLA6 area, Mr Whitney considers it conceivable that the land may be used for grazing rather than viticulture or horticulture as indicated in the visualisations. I agree with his comment, bearing in mind that the purpose of the amendments have been to enable greater productive use of this area. As stated previously, the visual simulations represent one possible scenario. While grazing could be a potential outcome, resulting in a greater area of open space than shown in the visual simulations, in my opinion, this would not create any further adverse visual effect.
- 27 Mr Whitney also notes the presence of amenity tree planting along part of the Ripponvale frontage and is correct in stating that the Ripponvale amenity edge had been removed in the latest iteration of the Structure Plan. At the time of the

visualisations it was understood that amenity planting would be present in association with the proposed development entry and as such this has been included in the visualisations, particularly notable in the visual simulation from Viewpoint 12. Subsequently, the 'Amenity Edge' has been reinstated for the full Ripponvale Road boundary and accordingly the visual simulations accurately depict this feature.

*Supplementary Section 42A Landscape Conclusion*

28 Address Section 5.4, Whitney states the changes in the latest iteration will exacerbate adverse effects compared to the previous version of the notified structure plan. I do not agree with this conclusion.

*Matters Raised Supplementary Landscape Review Comments*

29 Mr. Espie's comments in his Supplementary Landscape Review (dated 24 August 2020) are mostly in agreement with my own. He continues to recommend reduction of development within the SAL, this is the only outstanding matter of difference between myself and Mr. Espie. I am comfortable with my previous comments regarding this.

**Conclusion**

---

30 On a whole I consider the revised Structure Plan to represent a well-considered approach to the site, finding a balance between the original proposal and addressing the concerns of the representatives of the Residents for Responsible Development Cromwell group relating to rural amenity and productive land use.

Dated this day 16 September 2020



---

Tony Milne