

To: Kirstyn Royce, Consultant Planner  
Organisation: Otago Regional Council  
From: Rachael Annan, Technical Director | Landscape Planning  
Date: 04 October 2024 SLR Project No. 860.016637.00001

RE: RM230328 - Maori Point Road Tarras, farm park subdivision - Landscape Peer Review

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## INTRODUCTION

SLR Consulting NZ (SLR) has been engaged by Central Otago District Council (CODC) to conduct a technical review of this resource consent application (including subsequent s92 response. Unless otherwise stated through this document, quoted text is taken from the application's landscape assessment (Align, September 2023).

A visit to the application site and surrounds was carried out on September 25th 2024.

The application site address is at 5 Maori Point Road Tarras and the proposal, as set out in application plans and drawings, involves subdivision to enable the development of 16 x 2000m<sup>2</sup> residential allotments. Further key landscape related aspects of the application involve:

- A productive balance lot provision of approx. 120ha, being the remainder of the wider property;
- Shared 4.5m wide access for the proposed allotments off Maori Point Road;
- Native revegetation of the steep escarpment face (under QE2 covenant);
- Mitigation and enhancement planting of the proposed built development area and to north and east boundaries of the wider site, and;
- Relocation of powerlines through the site.

The assessment draws reference to both the *'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'* and *'NZILA Best Practice Field Guide (BDP 10.20)'*, both documents produced by Tuia Pito Ora/NZILA.

The application has non-complying activity status due to the proposed allotment sizes being below 8 hectares within the Rural Resource Area.

## RESPONSE

As set out in the assessment, the application site, under pastoral land cover involves

*'...three landform components; a near completely flat upper terrace, a lower terrace that sits in close elevation to the Clutha River and a steep escarpment of approximately 20m in elevation and separates these lower and upper terraces.'* (p.47)

The assessment notes this and other distinctive aspects of the landscape setting. However, the existing landscape attributes and values evaluation which forms the basis for considering landscape capacity for change, is based on more *generic* rural character factors.

*'Overall, the surrounding landscape character is open and expansive rural landscape, with low density and sparse built form, with agricultural activities visible across the wider landscape and vegetation in the form of shelterbelts.'* (p.67)

This existing landscape summary does not address what is distinctive of the landscape setting, as set out by *'Te Tangi a te Manu'*. This is noted particularly at the expense of appropriate consideration of landscape sensitivity and prominence associated with the upper terrace, near it's edge to the escarpment.

Terraces and prominent locations are also referenced in landscape relevant matters of the district plan (as listed in the assessment). As a recognised landscape feature in the landscape setting, the terrace is a highly legible lineal and horizontal landform. It is a sculptural and aesthetic landform which expresses valley formation, and contributes to the distinct landscape character and amenity of the setting. Associated visual prominence is also afforded to these landform features, (also noting provisions for skyline effects in the district plan, where relevant).

The proposed arrangement of the sixteen 2000m<sup>2</sup> allotments is set out to extend in a linear arrangement just back from the escarpment on the upper terrace. Described in the assessment as a cluster development, this arrangement will read as a row of dwellings, with slight gaps between allotment groups of 3-4 along it's length. This is evident in visuals provided with the assessment; the pattern also observable with height poles set out onsite.

The nature and magnitude of the proposed built form row is an extensive arrangement, heightening the apparent density proposed, and overtly domesticating the upper terrace. The pattern of 16 extensively arranged dwellings, on what is a valued landscape feature noted in the district plan, is a concern from a landscape perspective. It is considered to represent overdevelopment of the site.

The lineal built development pattern proposed was also not observed in the existing landscape setting. Neither is the proposed arrangement considered congruous with the consented development highlighted by the applicant (which proposes to scatter dwellings to the outer edges of a rural site). Neighbouring dwellings in the vicinity of the site, particularly with a view to the site, are predominantly set out as singular dwellings.

The applicant's intent to retain workable farmland and provide amenity, mitigation and (escarpment) restoration planting as part of the this application is understood. However, the proposed planting will not robustly offset the landscape character and visual effects of the proposed built form arrangement. The outlook that would be offered by each of the future dwelling setout is also indicative of their prominence arranged atop the terrace.



It is considered that there may be more appropriate opportunities to cluster built form development onsite, which may (flooding risks and placement addressed) include lower terrace locations. Effective and appropriate cluster development would serve to:

- Diminish the apparent number of dwellings (by it's considered and grouped arrangement), and;
- Protect sensitive landscape areas from development by focusing it elsewhere on a site.

Planting mitigation is a secondary consideration to an appropriate development approach.

In summary, the assessment's findings in support of the application draw on generic rural character and derived landscape values, which enables the development to be more readily supported on the basis of mitigation measures provided. Robust consideration of distinct landscape sensitivity (alongside the nature and magnitude of the application proposed) is lost to this approach.

The application's landscape assessment findings are not supported. In reviewing the assessment and visiting the site and surrounds, it is considered that the landscape effects have not been demonstrated as less than moderate to moderate-high.

Regards,

**SLR NEW ZEALAND**

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Peer Review / QA



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