BEFORE THE HEARINGS PANEL
FOR THE CENTRAL OTAGO DISTRICT COUNCIL

UNDER	the Resource Management Act 1991
IN THE MATTER	of RC240033 an application for land use consent to construct a second residential dwelling in the Rural Residential Area at 353 Dunstan Road, Alexandra
BY	**NATASHA WILLIAMS** Applicant

EVIDENCE OF RICHARD TYLER

Dated: 2 December 2024

TODD & WALKER law
LAWYERS | NOTARY PUBLIC

Solicitor acting
R E M Hill / B A G Russell
PO Box 124 Queenstown 9348
P: 03 441 2743
rosie.hill@toddandwalker.com
ben.russell@toddandwalker.com

Statement of evidence of Richard Tyler

1.0 QUALIFICATIONS AND EXPERIENCE

1.1 My name is Richard Tyler.

1.2 My qualifications include a Bachelor in Landscape Architecture with Honours from Lincoln University and I am registered with the New Zealand Institute of Landscape Architecture.

1.3 I have over 20 years experience in the industry, having worked for several design and planning consultancies throughout New Zealand. My expertise includes landscape architecture, urban design, master planning and assessment.

1.4 In January 2017 I founded SITE Landscape Architects, with the majority of our projects located in Wakatipu Basin and Wanaka. Prior to this, my employment history includes working for Darby Partners in Queenstown and Boffa Miskell in Auckland.

1.5 I have been involved in a wide range of design and assessment projects at plan change resource consent and hearing phase. I have also undertaken a number of peer assessment reviews for QLDC.

2.0 CODE OF CONDUCT

2.1 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2023 and I agree to comply with it. I have read and agree to comply with that Code. In that regard, I confirm that this evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

3.0 SCOPE OF EVIDENCE

3.1 My evidence addresses the following:

(a) assessment methodology;

(b) description of the subject Site and surrounding character;

(c) summary of the initial landscape assessment for the original resource consent application; and

(d) description and Landscape Assessment for the revised proposal.

4.0 METHODOLOGY

4.1 The assessment within my evidence was undertaken in accordance with 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA), July 2022.

4.2 In my assessment I refer to the 7-point scale listed below, as derived from the NZILA Guidelines. The top rows show how the rating scale can be related to wording in the RMA:

4.3 To inform the assessment, I prepared a series of visual simulations which are appended. The views were prepared in 3d software using lidar contours and overlaid over the photos using known survey points. The montages are an accurate depiction to compare and assess landscape effects.

5.0 SUBJECT SITE AND LANDSCAPE CHARACTER

5.1 The subject site is located at 353 Dunstan Road, Alexandra, legally described as Lot 1 DP 316193 (**Site**).

5.2 The Site is within the Rural Residential zoning on the north-eastern side of Dunstan Road, which runs north-west to south-east parallel with the main Clyde – Alexandra Road.

5.3 The surrounding flat land on the north-east side of Dunstan Road has been subdivided for Rural Residential use, with significant tree planting within the lots and running alongside their respective road boundaries, largely screening views into these dwellings.

5.4 The elevated river terrace is located to the north of the Site. On the south-western side of the road lies the Otago Central Rail Trail with productive orchards beyond within the flat plain.

5.5 The subject Site, consistent with other surrounding sites along Dunstan Road is long and skinny shape running perpendicular to the road. The property contains a large amount of mature deciduous trees, including a row of birch trees running along the road boundary. Similar to surrounding properties, this vegetation provides seasonal screening into the Site.

5.6 Surrounding residents value their outlook, privacy/amenity, rural views from their dwellings and productive values of the land. Values for tourists and users of the trail include those relating to the recreational experience – appreciation of natural features such as orchards, trees, hills and the expansive plains. For motorists passing by, the area forms a semi-rural transition between the enclosed Cromwell Gorge through to the open plains east of Alexandra.

6.0 SUMMARY OF INITIAL LANDSCAPE ASSESSMENT WITH ORIGINAL RESOURCE CONSENT APPLICATION

6.1 I undertook a site visit in May 2024 for the initial application. During this visit, one of the 8.2m height poles was broken and I was not able to put up the other. The Site has a significant number of trees which meant that if the 8.2m poles were up, I would not be able to see them clearly from the road. (It was also difficult to make out the lower poles from the road). From standing on the road outside the Site, the hillslope beyond was also hard to make out through the foliage. Because of this I incorrectly assessed there would be no skyline breach (noting that existing vegetation would provide enough screening even if there were a breach).

6.2 I concluded that views of the proposal would be short and filtered when driving at 80kph past the Site. I did not assess views from the Rail Trail, and views would also be possible from the Rail Trail when travelling at a slower speed, although the proposal would not be viewed above the skyline.

6.3 With or without a skyline breach, I concluded that there was enough existing vegetation in and around the Site that views into the Site were well screened and at worst, would be softened by twiggy foliage in the winter. My recommended condition was that at least 75% of the trees

along the road frontage should be retained to maintain screening to the road. I note this condition did not get picked up in the application.

6.4 The CODC planner, Mr Vincent, visited the Site during winter with all poles in place. At this point, the trees had no leaves and views into the Site were more open. He summarized that the proposal would form a 'Significant skyline breach' from Dunstan Road. He summarised that this would lead to adverse effects on landscape character. He acknowledges that his assessment was based upon the 8.2m high poles (however, notes that those were bending in the wind and are approximately 40cm short of the proposed roofline).

6.5 My initial assessment did not consider the visibility of the building from the road in all seasons, noting that most of the trees providing screening are deciduous.

7.0 REVISED PROPOSAL

7.1 Since the review of the s 42A report, the Applicant has proposed a redesigned proposal for assessment which includes:

- The building rotated 90 degrees with the end gables now facing the road;
- The building is moved back approximately 14.5m from the prior location and now has a 40.5m setback to the road boundary; and
- An updated landscape plan. This plan shows the existing trees along the road frontage and driveway proposed to be retained to maintain seasonal screening. The updated plan is attached to this evidence as **Attachment A**.

7.2 To assess effects (and noting that the trees screen views of height poles) I prepared a series of photomontages to demonstrate the visibility of both the initial proposal and the revised proposal in relation to the hill slope/skyline beyond. The 3D computer model is accurately superimposed over both my own summer photos and Mr Vincent's winter photos.

7.3 These photomontages are attached to this evidence as **Appendix B**.

8.0 LANDSCAPE ASSESSMENT OF REVISED APPLICATION

Visibility and visual amenity values

8.1 The key views of the proposal are from Dunstan Road travelling past the Site and from the Rail Trail. The proposal will not be visible from any other places, noting the neighbours have signed APAs for the proposal.

8.2 An assessment of each viewpoint based on the appended photomontages is as follows. View photos 0 – 3 were taken during my Site visit in May this year with the initial application. Photos 4 & 5 were taken by Mr Vincent in August. I have not visited the Site again with the revised poles in place. Rather, I have carried out this assessment from the photomontages. I consider that, similar to May earlier this year, with leaves on the trees the poles and subsequently the proposal will be hard to see from the road. These are set out below:

- **View 0:** Site photo during initial Site visit in May – the 8m poles for the original proposal were broken and down.

- **View 1:** Original building breached skyline by a small amount. Revised building sits under skyline and the end gables are visible, reducing overall bulk. Pine trees on neighbouring property screen the proposal, noting these trees could be removed, although I have not checked consent files to check if these are protected. As the building now sits under skyline, and gable bulk is reduced, I consider that no additional screening is required within the Site for this viewpoint. Very Low effect on landscape character.

- **View 2:** Original building breached the skyline by a large amount, though I would not agree that was a 'significant breach' as referred to in the s 42A report. The revised building also breaches skyline by a lesser degree, with gable facing road, rather than the broad side of the dwelling. I consider, with vegetation retained along road frontage, vegetation behind the building and beyond the Site and in front of the terrace slope itself, this breach overall to be minor and have a Low effect on landscape character.

- **View 3:** Original building breached skyline by a large amount. Revised building has a very small breach of the end gable. I consider this breach will be imperceptible when moving at 80kph and with vegetation behind the building mostly screening the terrace slopes beyond.

- **View 4:** This was taken by Mr Vincent in winter. The original building breached the skyline. The revised building has a small breach of the end gable. This small breach is now more acceptable, considering viewing speed (at 80kph on Dunstan Road) and the oblique nature of the view, many people will not turn this way when driving past.

- **View 5:** From Rail Trail, also taken by Mr Vincent during winter. Slower viewing speed on bikes with more perception of view. Original building sat under skyline but had a large bulk with the side of gable facing the view. The revised building sits under skyline with end gable reducing visual bulk. Very low effect, including during winter.

8.3 To summarise, the revised application being further setback from the road and rotated has reduced the visual height and bulk of built form. The proposed building has a maximum height about natural ground level of 8.792m, which is 1.292m above the maximum height of 7.5m. The Site slopes up gently toward the rear, it is proposed to cut the building into the ground at the rear of the Site, so this height applies to the front only with the breach reducing by approximately 600mm at the rear. I note that the height of the proposal is not unusual in the locality, considering other barns and farm buildings. I note that the 7.5m standard is not an absolute limit, rather it triggers a discretionary activity assessment under the district plan.

8.4 The design includes two simple gables, which further reduce perceived bulk and is an appropriate built form for the rural area. For example, a two-storied residential-type bungalow with a complex roofline and facade would potentially exasperate perceived scale by introducing visual clutter.

8.5 With existing trees in place, I consider effects on the visual amenity of the proposal to be low to very low. The building while of a large scale, will have recessive natural materials and is designed to mimic a large barn to fit the rural aesthetic of the area. The skyline breach will be minor at most which will be difficult to perceive driving past at 80kph with surrounding trees and only very filtered views of the skyline beyond. During winter months when visibility is increased, the building will form an anticipated part of the consistent grain of dwellings located along this side of Dunstan Road.

Landscape character and cumulative effects

8.6 Landscape character values as noted are based around appreciation of productive and open space amenity for residents and recreational values for cyclists. Buildings along the north-eastern side of the road are within a vegetated framework, reducing dominance of buildings and maintaining a leafy rural living character. The proposed building with trees in place will be consistent with this existing character.

8.7 In terms of cumulative effects, the existing dwelling and shed within the Site are well-screened from outside of the Site. The proposed building, while visible when travelling past the Site on Dunstan Road and the Rail Trail, will form an anticipated part of the existing density. Both buildings will be visually separated in views, and therefore will not contribute to a stacking of buildings or a visible increase of density.

8.8 In response to density, mostly all buildings along this stretch of road are well-screened from the road. The plantings provide a framework to absorb built form, and all of these buildings are not visible together in any views. It is unlikely all these trees will be removed as they provide privacy and screening between properties and to the road. As a result, the additional building will not create adverse cumulative effects, because collectively the surrounding buildings are all well-screened.

8.9 Overall, based upon the revised proposal and landscaping response, I consider the proposal is appropriate in light of Rule 4.7.6A.f. As two simple gable forms, the visual bulk of the dwelling will be minimised. It will blend with existing rural living densities and character, and there will be no adverse cumulative effects on the anticipated rural residential

character of the area when viewed in conjunction with other existing development on the Site and in the wider area.

9.0 OBJECTIVES AND POLICIES

9.1 The s 42A report notes:

> Objective 4.3.3 and Policy 4.4.2 seek to maintain the rural amenity values created by open space, landscape natural character and built environment values of the district's rural areas, and maintain the character of the district's hills and ranges. Development should also be compatible with the surrounding environment, and be located and designed to not compromise the landscape and amenity values of prominent hillsides and terraces.

9.2 The proposed building, as noted above, will sit within a vegetated context, with trees shown on the landscape plan to remain both in front of and behind the building. The building design is simple gables and mimics a rural barn and is an appropriate design for the locality. The building design will maintain rural character rather than introducing a standard residential-style building into a rural setting.

9.3 As travellers pass by the Site, the terrace slope beyond is not prominent or overly visible, the immediate vegetation defines character. In this sense I consider the minor breaches as noted, with retention of trees will not compromise the visual integrity and amenity values of the slope beyond.

9.4 The s 42A report notes:

> Policy 4.4.10 is a catchall objective intended to ensure development in rural areas appropriately manages its adverse effects on a range of matters. Of particular relevance to this application, these include open space, landscape and natural character of the rural environment, the production and amenity values of neighbouring properties, and the operation of the roading network.

9.5 I consider the revised proposal will maintain open space, landscape and natural character, including rural and productive values for surrounding residents, recreational values for those using the cycle

trail, and scenic and rural values for people passing by car along Dunstan Road.

10.0 CONCLUSION AND RECOMMENDATIONS

10.1 Based on the revised proposal with further detailed assessment supplied, I consider that the proposal will maintain rural amenity values created by open space, landscape natural character, and built environment values of the district's rural areas, and maintain the character of the district's hills and ranges, aligning with the objectives and policies of the rural resource area of the CODC district plan.

10.2 Overall, I consider that visibility of the revised proposal will vary from very low during summer months to low during winter months when travelling at speeds of 80kph for a short stretch of road alongside the Site. The minor skyline breaches as noted will be largely imperceptible at most times of the year, with a large amount of foliage surrounding the building on all sides.

10.3 I consider the design of the building, including recessive colours and materials, and the rural vernacular, will complement surrounding rural lifestyle character and productive values.

10.4 The landscape plan should form part of the approved plans to ensure a framework of vegetation will be maintained within the Site as a context for rural buildings. This will provide effective mitigation to the scale of built form and screen or filter visibility from the Road and Trail.

Dated 2 December 2024

Richard Tyler
Landscape Architect
SITE Landscape Architects

Appendix A - Updated plans

SITE LANDSCAPE
ARCHITECTS ^

353 DUNSTAN ROAD
ALEXANDRA

SECOND DWELLING
CONTEXT PLAN

1:500 @ A3

461_SK-01
27.11.24 _draft

FIG01

www.sitela.co.nz

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD ALEXANDRA

SECOND DWELLING LANDSCAPE PLAN

1:500 @ A3

461_SK-01
27.11.24 _draft

FIG02

www.sitela.co.nz

Appendix B - Photomontages

8m poles for RC App. location were broken and I could not install the other onto the warratah

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	Panorama
Photo taken:	10.05.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 0: SITE PHOTO
RC APP. LOCATION POLES

461_Views
15.04.24 . rev-
V0
www.sitela.co.nz

Photo Notes:

Camera: Iphone 13 Pro
Lens: 1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken: 10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 1: DUNSTAN ROAD VIEWING NORTH
EXISTING

461_Views
15.04.24 . rev-
V1
www.sitela.co.nz

Sketchup model
superimposed

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 1: DUNSTAN ROAD VIEWING NORTH
RC APP. LOCATION

461_Views
15.04.24 . rev-
V1A
www.sitela.co.nz

Sketchup model
superimposed

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 1: DUNSTAN ROAD VIEWING NORTH
REVISED LOCATION

461_Views
15.04.24 . rev-
V1B
www.sitela.co.nz

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

Sketchup model
superimposed

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE
ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 2: DUNSTAN ROAD VIEWING EAST
RC APP. LOCATION

461_Views
15.04.24 . rev-
V2A
www.sitela.co.nz

Sketchup model
superimposed

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 2: DUNSTAN ROAD VIEWING EAST
REVISED LOCATION

461_Views
15.04.24 . rev-
V2B
www.sitela.co.nz

Photo Notes:

Camera: Iphone 13 Pro
Lens: 1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken: 10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 3: DUNSTAN ROAD VIEWING NORTH
EXISTING

461_Views
15.04.24 . rev-
V3
www.sitela.co.nz

Sketchup model superimposed

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 3: DUNSTAN ROAD VIEWING NORTH
RC APP. LOCATION

461_Views
15.04.24 . rev-
V3A
www.sitela.co.nz

Sketchup model
superimposed

Photo Notes:

Camera:	Iphone 13 Pro
Lens:	1X, 26mm, 72 degree view angle. (Represents near peripheral and small part of mid peripheral view)
Photo taken:	10.05.24

Hold printed A3 sheet 30cm from eye to replicate real view scale

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 3: DUNSTAN ROAD VIEWING NORTH
REVISED LOCATION

461_Views
15.04.24 . rev-
V3B
www.sitela.co.nz

Photo Notes:

Camera:	Taken by CODC planner - Samsung Galaxy S23
Lens:	Unknown
Photo taken:	26.08.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 4: DUNSTAN ROAD VIEWING NORTH-EAST
EXISTING

461_Views
15.04.24 . rev-
V4
www.sitela.co.nz

Sketchup model superimposed

Photo Notes:

Camera: Taken by CODC planner - Samsung Galaxy S23
Lens: Unknown
Photo taken: 26.08.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 4: DUNSTAN ROAD VIEWING NORTH-EAST
RC APP. LOCATION

461_Views
15.04.24 . rev-
V4A
www.sitela.co.nz

Sketchup model superimposed

Photo Notes:

Camera: Taken by CODC planner - Samsung Galaxy S23
Lens: Unknown
Photo taken: 26.08.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 4: DUNSTAN ROAD VIEWING NORTH-EAST
REVISED LOCATION

461_Views
15.04.24 . rev-
V4B
www.sitela.co.nz

Photo Notes:

Camera:	Taken by CODC planner - Samsung Galaxy S23
Lens:	Unknown
Photo taken:	26.08.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 5: RAIL TRAIL VIEWING NORTH-EAST
EXISTING

461_Views
15.04.24 . rev-
V5
www.sitela.co.nz

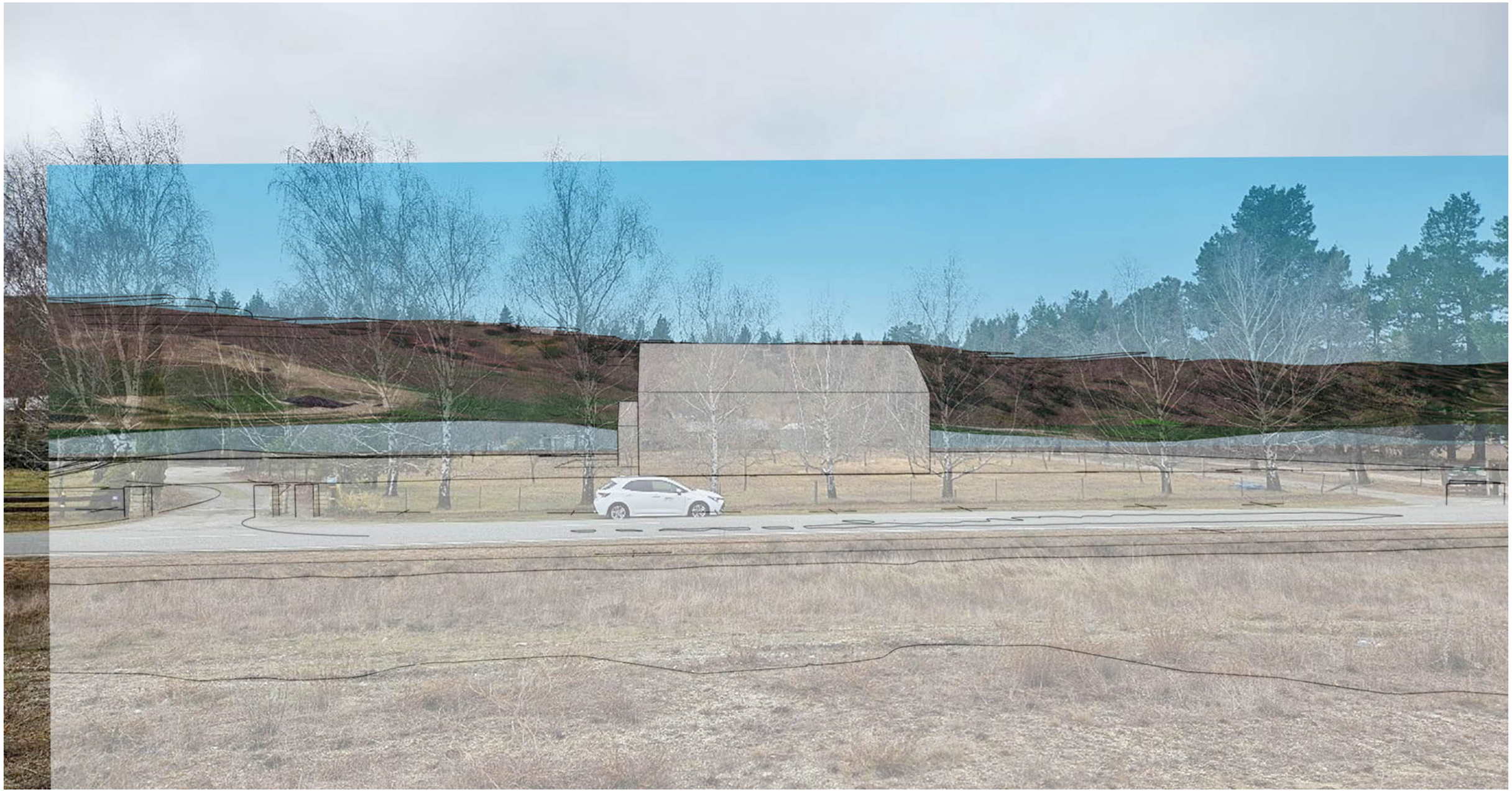

Photo Notes:

Camera:	Taken by CODC planner - Samsung Galaxy S23
Lens:	Unknown
Photo taken:	26.08.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 5: RAIL TRAIL VIEWING NORTH-EAST
RC APP. LOCATION

461_Views
15.04.24 . rev-
V5A
www.sitela.co.nz

Photo Notes:

Camera:	Taken by CODC planner - Samsung Galaxy S23
Lens:	Unknown
Photo taken:	26.08.24

SITE LANDSCAPE ARCHITECTS ^

353 DUNSTAN ROAD
SECOND DWELLING

VIEW 5: RAIL TRAIL VIEWING NORTH-EAST
REVISED LOCATION

461_Views
15.04.24 . rev-
V5B
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