CHRISTCHURCH CITY COUNCIL

PROPOSED SUBDIVISION AND LAND USE RESOURCE CONSENT

Braeburn Property Ltd – Portlink, 320 and 320A Cumnor Terrace, Christchurch

LANDSCAPE PEER REVIEW & VISUAL ASSESSMENT
Version 2

To: Rachel Cottam, Senior Planner, Christchurch City Council

Copy: Paul Lowe, Manager Resource Consents, Christchurch City Council

From: Jeremy Head, Registered NZILA Landscape Architect
Jeremy Head Landscape Architect 2022 Ltd.

Date: 11 August 2023

Introduction

I have been asked to peer review and provide further landscape-related advice regarding the Visual Impact Assessment (VIA) authored by Nika Kent and Chris Greenshields from DCM Urban for the Applicant (Braeburn Property Ltd).

I have read the AEE, VIA[1] and VIA Addendum[2] and visited the site on 14 December 2022 and 8 and 9 May 2023. During all site visits I observed the site from multiple points within the receiving environment.

Following the first site visit and the earlier iteration of the Proposal and VIA, I provided a series of landscape-related questions that were included in a Council Request for Further Information (RFI). These questions were answered by the Applicant by way of the 23 March 2023 addendum to the original VIA. I also attended two workshop discussions at the Christchurch City Council offices, one which included the Applicant and the Applicant's technical experts. Following this meeting I prepared a combined peer review/visual assessment in a similar format to this report. This was provided to the Applicant as a 'draft' of sorts, with the intention that the Applicant had a chance to review, provide further information or consider any changes to the Application before a final report (being this report) was prepared by myself.

The Applicant subsequently, and helpfully, provided further information[3] which is drawn on in this 'Version 2' report.

The purpose of my report is twofold. The first is to carry out a peer review of the DCM Urban VIA (from hereon, any reference to 'VIA' includes the VIA addendum and further information received most recently), and secondly, to expand on matters further where necessary. Within the Applicant's VIA, I agree with the site and context description, use of the widely accepted 7-point scale of effects and in some cases what the likely visual effects will be arising from the Proposal. I also agree that the visual effects of a building – the difference whether it is 11 m or 11.6 m high will be difficult to discern. My report will not repeat these aspects, other than where I disagree with a statement made in the VIA or where I believe additional information or further 'fleshing out' of the potential landscape effects may be of benefit to the decision maker.

I understand that Council agreed with the Applicant that a 'visual effects' assessment carried out by a suitably qualified landscape architect would be sufficient for inclusion in the Application. Visual effects

[1] Subdivision and Land Use Resource Consent Application, Braeburn Property Ltd, 320 and 320A Cumnor Terrace, Christchurch, prepared by Novo Group Ltd (24 November 2022).
[2] Resource Consent RMA/2022/3611 – RFI Response Land Use and Subdivision Application 320 and 320A Cumnor Terrace, Christchurch, prepared by Novo Group Ltd (23 March 2023).
[3] Portlink Industrial Subdivision – Landscape and Visual RFI Response 'B' and associated A3 graphics 'Revision C' prepared by DCM Urban (21 July 2023); Chapman Tripp letter to Novo Group Ltd (20 June 2023).

are a subset of and help to inform landscape effects, or in other words, changes in landscape character brought about by (any) proposal. Visual effects concern changes in views and the amenity derived from views. As such, my report will be limited to address the potential visual effects arising from the Proposal.

My report reviews and assesses the proposed departures from the requirements of the Outline Development Plan[4] for the site, specifically addressing the changes in building height and changes to the building setback.

The methodology underlying my assessment and additional advice is based on the recent NZILA Landscape Assessment Guidelines (2022)[5].

I understand that:

- The site is zoned 'Industrial General' and is subject to an Outline Development Plan. Relevant to the Proposal, and part of the ODP, is a 'Landscape and Stormwater Area (Green Space)' / building setback area and an '11 m Building Height Limit Area' both of which the Proposal partly overlays.

- To date, part of the 'Landscape and Stormwater Area (Green Space)' has been encroached upon by the Applicant, filled, paved in asphalt, and edged with concrete kerb and channel. The area has been fenced with a 2 m high chain mesh security fence. As such, I understand that this Application is partly retrospective.

- The new paved surface where the buildings are proposed to be located is on fill material approximately 1-2 m (maximum) above natural ground level. I understand that this filling was consented but was not established as part of a finished subdivision. Legal advice from Council is that the permitted baseline situation should measure building height from original ground level prior to filling – the ground level defined in the District Plan. Natural ground level is taken in my report to be 2 m below the current paved surface.

- Following recent advice from council, any buildings proposed by the Applicant within the 11 m height limit area can be taken as 11 m above the new asphalt paved surface level which is considered to be the 'expected scenario post subdivision'. This report therefore assumes that the proposed building height is measured from the new paved surface on site.

- 'Buildings' in the case of the Proposal may include *"any structure, whether permanent, moveable or immoveable; and/or any erection, reconstruction, placement, alteration or demolition of any structure or part of any structure within, on, under or over the land; and any vehicle, trailer, tent, marquee, shipping container, caravan or boat, whether fixed or immoveable, used on-site as a residential unit or place of business or storage."* [6]

- Potential items that may be realistically anticipated in an industrial context such as the site may also include the outdoor storage of things such as pallets, pipes, construction timber, logs, crushed aggregates, scrapped vehicles, scrap metal and the like. However, some of these items could not be stably / safely stacked 11 m high without a support structure. I understand that with a support structure, these stored materials would then fall under the definition of a 'building'.

- Shipping containers have a poorer aesthetic appearance than permanent walled/roofed buildings do generally. The Applicant's landscape architect agrees with this[7]. The outdoor storage of materials discussed above would likely have slightly lesser adverse visual effects compared with shipping containers which are bulkier.

[4] Appendix 16.8.3i – Portlink Industrial Park Outline Development Plan (April 2016), Christchurch District Plan.
[5] Te Tangi a te Manu – Aotearoa New Zealand Landscape Assessment Guidelines (2022). Prepared by Gavin Lister, Rachel de Lambert and Alan Tichener.
[6] Letter from Brookfields Lawyers to CCC regarding the definition of a building to be used (26 July 2022).
[7] Original VIA, Section 3.2.

- It is not considered fanciful that industrial buildings within the no height limit area could be 20 – 25 m high. I note that the Applicant has recently suggested that several buildings/activity types may be as high as 31 m within this part of the site and provides a list, which I consider is fair and reasonable.

- Permitted built development within the site will obscure some people's views of parts of the Port Hills / Crater Rim landscape.

- The Proposal's overall activity status is discretionary[8].

I structure my report under seven topics:

1. Receiving environment.
2. The effectiveness of the cross section and 3D modelling diagrams used and relied on in the Applicant's VIA.
3. Discussion on the visual effects of the Proposal in the Applicant's VIA.
4. Proposed mitigation.
5. Loose stockpiled material
6. Peer reviewer's opinion of likely visual effects.
7. Recommendations.

1. Receiving Environment

Although not named or mapped as such in the VIA, a receiving environment has been alluded to at paragraph 3.5 and in *'A. Viewpoint and Visualisation Locations (1:10,000)'* in the VIA.

To clarify, a receiving environment is an area (normally mapped) that includes the extent where the effects of a landscape change may potentially be adverse. Such an area is typically determined firstly through desk top evaluation, followed by careful field study. Changes to the landscape brought about by (any) proposal will often be visible from outside the receiving environment; however, as is often the case any potential effects from here will be acceptable (less than minor). This is usually due to the view distance from the landscape change and the nature of other contextual development in the scene, where the visual prominence and contrast of the change with its setting will be sufficiently diluted.

Following three site visits, and for completeness, I have prepared a receiving environment map for the Proposal (my **Attachment 1**). In my opinion, the visual effects of the Proposal will be potentially adverse within this area requiring detailed assessment. The VIA includes viewpoint locations (1, 2, 5, 6, 7 and 8) which fall outside my Attachment 1 receiving environment area. A determination is made in the VIA that any adverse visual effects of the Proposal from these locations following mitigation will be 'less than minor'. Following viewing the site from these more distant locations, I agree with this conclusion. As such I comment no further on the visual effects of the Proposal from beyond the receiving environment mapped in my Attachment 1.

The receiving environment illustrated in my Attachment 1 includes both public and private audiences. These groups include:

- Residents of Ferry Road, Gould Crescent, Long Street and Barton Street (fixed, long-term views).
- Travellers on the road network, including cyclists and pedestrians (transient, short-term[9] views).
- Travellers on Tunnel Road / SH74, (transient, short-term[10] views).

[8] Statutory Framework section, Subdivision and Land Use Resource Consent Application, Braeburn Property Ltd, 320 and 320A Cumnor Terrace, Christchurch, prepared by Novo Group Ltd (24 November 2022).
[9] When passing through an area without generally stopping.
[10] When passing through an area without generally stopping.

- Recreationists on the public riverside tracks including the Tow Path, footbridge over the 'Woolston Cut', Gould Reserve and riverbank area including the Opawaho / Heathcote River and 'Woolston Cut' (transient, short-medium[11] term views).

The visual effects of the Proposal, within the receiving environment will be influenced by existing levels of amenity and expected ongoing levels of amenity in the area. The VIA does not describe the landscape context proximate to the site in detail. From my site visits, the surrounding residential area has pleasant levels of amenity due to tall front fences being largely absent on road frontages, well kempt gardens, well-maintained dwellings, and 'quiet'[12] streets (my **Attachments 5, 6, 8 and 9**). The minimal front fencing provides a clear visual connection between the private and public realm / streetscape. It is likely too that the low level of front fencing is due to a friendly close-knit community and enables some occupants to have clear views to the river environment and beyond to the Port Hills backdrop although I acknowledge that this is speculative to a degree.

The riverbank areas are neatly mown and include large deciduous trees dotted about. In other areas swathes of native riparian vegetation form more natural riparian margins. Well-formed asphalt paths provide easy access through the area. On the true right of the Opawaho / Heathcote River, and true left between Gould Crescent and Tunnel Road / SH74 meandering 'single' tracks winding through native vegetation provide access to a popular off-road environment for walkers and mountain bikers. During my site visits, several people passed by on foot or by bike on these tracks. Views within the receiving environment tend to rest on the Port Hills backdrop and enclosure provided by Montgomery Spur and Mount Pleasant Spur. The tidally influenced Opawaho / Heathcote River and the Port Hills backdrop, with its seasonal changes in grass colour, punctuated with frequent rock outcrops and changes in light are particularly important natural landscapes and points of focus in the area. These features are an important source of amenity, doubtless valued by locals and those passing through the area.

As such, it is my conclusion that for those residing in the area and passing through on foot or by bicycle, existing visual amenity values are moderate – high, lessened by the proximity to the industrial zoning nearby, including the site. For those in motor vehicles passing through on Tunnel Road, Ferry Road and Dyers Road existing amenity is moderate, lessened by the road environment itself, and industrial zoning, particularly evident where the stacked containers on site are visible from Ferry Road and Dyers Road.

2. Cross Section Diagrams and 3D modelling

The VIA includes two section views *('B. Baseline/ Proposal Section' and 'B Gould Crescent Section')*. Both are set perpendicular to the northern site boundary and run roughly north south. Both include the proposed building location and heights and the location of sightlines, taken from a view height approximately 1.65 m (approx. eye height) above the ground at two offset distances. The ground level shown and measured from, is the new filled/paved surface level. Of note, 11 m high buildings in an expected scenario post subdivision will screen the visibility of part of the Port Hills including the ridgeline from some viewpoints north of the site (my **Attachment 5**).

The proposed 11.6 m buildings would be inside the 'Landscape & Stormwater Area (Green Space)' forming the 'front rank'. The Applicant's VIA sections then illustrate built height gradually increasing southwards up to 18 m high. The intention being, that these higher buildings will be below the sightline, set by the 'front rank'. This of course relies on 11.6 m high buildings located in the green space area. In an 'expected scenario post subdivision', the sightline is flatter, as the buildings are slightly lower at 11 m high and are set further back compared to the Proposal (my **Attachment 2**).

Buildings up to 18 m high will be substantially higher than the permitted 11 m maximum building height in this area. However, while 18 m high buildings may be less discernible from locations near the Proposal, the graduated height up to 18 m will be more obvious from further away, such as to the east, with these effects falling on occupants with permanent long-term views including those living

[11] When passing through an area and occasionally stopping where there may be open space, seating, interpretation etc.
[12] Not in terms of audibly, but due to the slow pace, few traffic movements and 'pedestrian friendly' ambience.

along Ferry Road[13]. While Ferry Road is busy, closer and between these parties and the Proposal, this makes their vistas to the Port Hills / Montgomery Spur doubtless more valued. The Proposal will intrude into these vistas, interrupting views to Montgomery Spur (my **Attachments 1 and 3**).

At paragraph 3.4 in the Applicant's VIA, 'side on' effects from the east are briefly mentioned where a 'Low' / less than minor effect is found due to the mitigating effects of 'separation distances, wider available views and intervening vegetation associated with the Heathcote River'. I disagree with this conclusion.The graduated side profile will also be apparent in short–medium term views for the public travelling by on Ferry Road and the Tow Path within the mapped receiving environment, screening part of the Port Hills ridgeline (short–medium term views) (my **Attachment 3**).

The Applicant's VIA states at 3.4 that the gradually increasing height would 'not be visible'. This would only be the case from nearer northern viewpoints, e.g., viewpoints 3, 4, 5, 6 and 16 (my **Attachments 2, 4, 5** and **10**). The graduated building height up to 18 m will be more apparent from the north to 'flatter' more distant views and from near views from the second storeys of Gould Crescent dwellings.

Two 3D modelling diagrams have been recently received from the Applicant which are helpful. One viewpoint is based on a location from Ferry Road, the other from near 32 Gould Crescent. Of note, viewpoint 2 appears to be near 90 Barton Street. However, the modelling of 'view 2' appears to be from near 32 Gould Crescent.

The methodology used to generate the modelling is not stated by the Applicant. However, the two viewpoints used are close to my own viewpoints 3 and 7. As such, it is of my opinion that the simulated proposed built forms in an expected scenario post subdivision appear to be accurate. The effects of the proposed compared with what is an 'expected post subdivision' scenario is clearly defined which is also helpful. However, the uncontained 'loose outdoor material storage' (black dotted outline) shown, appears in my opinion, larger than it would actually be. This is due to the effects of perspective where the 'summit' would be further from the viewpoint and hence visibly lower in height. In addition, the angle of repose means that this material extends inside the green space area where it is not a permitted activity – particularly evident in the viewpoint 1 simulation where the 'pile' is shown partly in front of the proposed building.

3. Discussion – VIA's Visual Effects Conclusions

As discussed, the Proposal seeks permission for a range of building options as defined above in the introduction to this report. The VIA states at 3.2: *"While it is accepted that outdoor storage (including shipping containers) has lesser aesthetic appeal compared to buildings (where architectural form and materiality can reduce visual effects), and likely result in a change to the perceived pleasantness of the site and surround environment, the potential visual bulk, height and scale remains comparable."* I agree with this statement. The visual effects of the shipping containers can be seen now. By nature, shipping containers vary in colour, branding graphics, and physical condition. Some may be rusty and/or include graffiti. They regularly change in their stacked arrangement and can often be seen being moved about. For these reasons a stack of shipping containers between 11.6 m and 18 m high will have greater adverse visual effects than built industrial development such as warehousing, drier towers or silos would in an expected post subdivision scenario.

At paragraph 3.3 in the VIA the effects of the 13 -16 m sealed encroachment into the Green Space Area is stated as having 'low' visual effects compared to buildings. I agree with this in principle; however, this does not mean the encroachment is appropriate. The encroachment has several adverse effects on landscape - beyond the visual.

The 2.4 m high acoustic fence on top of the 2 m high bund (4.4 m overall height) will provide immediate screening to the lower parts of any buildings. To closer views, such as from the track on the true right of the river much more of the proposed buildings will be screened, due to the steep view angle. However, the fence itself will have its own adverse visual effect, comprising a 2.4 m high non-natural, continuous form adjacent to the highly natural river corridor. Fences are not permitted within the 'Landscape & Stormwater Area (Green Space)'[14]. However, over time the fence will be screened

[13] 853 – 909 Ferry Road
[14] Rule 16.4.4.2.3 (ii) C; Christchurch District Plan.

by the proposed planting but only from the medium term[15] onwards in my opinion. In the short term this structure will appear dominant, particularly for the public located within the esplanade reserve / track to the north of the bund.

The VIA refers in several places to the 11.6 m height limit having little additional effect when compared to the 11 m maximum building height . In principle I agree with this. A 0.6 m increase is not great relative to 11 m (approximately 5% higher). The concern lies with the 11.6 m buildings' encroachment closer to the northern site boundary. From the eight properties on Gould Crescent[16], nine on Long Street[17] and from 90 Barton Street, the buildings will be closer and due to the effects of perspective will appear to 'loom up' higher given the site has already been raised by up to 2 m. The 4.4 m high screen (bund + fence) will have less screening effect than it would were the buildings set back as required by the ODP.

At paragraph 3.4, the VIA states that the visual effects of the 11.6 m – 18 m proposed building height within the 11 m height limit area will generate a 'low' magnitude of change. Later the VIA states that from the east, the potentially higher built form will be apparent. The higher built form will be very apparent given the 11 m maximum height in this area. These effects will be felt from several residences on Ferry Road as well as on the public passing by. The effects are concluded in the VIA to be 'low' (less than minor).

At paragraph 3.5 a table is included in the VIA where the effects 'after mitigation measures' are stated. At paragraph 3.6, vegetation with a mature height of 8 m is mentioned, which possibly corresponds to 'after mitigation measures' although this is not explicit. There is no indication as to when the proposed vegetation is expected to reach heights of 8 m. There is existing native vegetation including Tasmanian ngaio along the base of the bund on its north side now which is approximately 5 m high. When this was planted is unknown.

All residual (post mitigation maturity) visual effects in the VIA are deemed 'less than minor', and the magnitude of change from all nine viewpoints is assessed as 'Very Low' or 'Low'. The Applicant has recently provided another effects table at Section 4 of 'RFI Response B'. This table compares my effects findings on various parties with the Applicant's own effects findings. The Applicant largely bases their findings on the difference between an 11 m high building and an 11.6 m high building inside the greenspace area. No mention is made of the effects of the proposed graduation in building height to 18 m further south within the 11 m height limit area. Again, it is unclear if the Applicant's effects conclusions are 'post mitigation', and where the effects are 'low', where they sit on the equivalent RMA (**Figure 1** below).

4. Proposed Mitigation

Mitigation measures include the existing bund, existing vegetation, proposed vegetation and an acoustic fence. On face value, these form a comprehensive suite of mitigation measures. In time, as stated in the VIA at paragraph 3.6, the mature height of the mitigation planting will be 8 m. I agree with this given the climatic conditions, putting to one side the ground conditions which will be discussed shortly. In the response to the RFI, two tree species *Plagianthus regius* (lowland ribbonwood) and *Tilia cordata* (small leaved lime) are stated as being able to reach 12 m and 15 m in height respectively. These heights accord with the Southern Woods website which assumes good growing conditions. Nonetheless, the maximum 18 m building height above the new site level cannot be fully mitigated from views from the east by what is proposed – even in the long term.

The Applicant stated in one of their responses to the RFI that the bund is constructed from crushed concrete with a 300 mm layer of topsoil and grass seeded for stabilisation. Later, the Applicant commented that the topsoil was possibly 600 mm deep, although this was not confirmed in writing. In the most recent correspondence from the Applicant, topsoil depths on the bund are stated as between 0.8 m and 1 m. A 1 m topsoil depth over suitably free draining material would be sufficient to establish the proposed planting in my opinion. However, from walking along the bund, the ground felt very firm underfoot, which was more suggestive of a shallow topsoil depth, such as 300 mm or less. Further, there was scant evidence of any woody vegetation naturally establishing on its surface, which

[15] After approximately 5 – 7 years as long as good growing conditions are provided.
[16] 32 – 38, 44, 44A, 52 and 54 Gould Crescent.
[17] 16 – 30 Long Street (and 45 Bamford Street).

suggested poor growing conditions. Of note, the Applicant's landscape contractor/advisor confirmed earlier that 300 mm topsoil depth would be sufficient to implement the proposed planting (RFI response point 5). The proposed planting includes 18 trees, each 2.5 m tall at time of planting. Additionally, over 600 trees at smaller grades are proposed in the Esplanade Reserve and along the Tunnel Road boundary.

In my experience tree species will not survive for long in 300 mm or even 600 mm of topsoil over compacted, crushed concrete. Grasses and ground cover plants may grow satisfactorily, although such plants would have little mitigating effect. Trees generally need at least 1 m of good soil depth for long term root growth, preferably not on top of crushed concrete, formed to a 2H / 1V slope. Cabbage trees, of which 41 are proposed, have deep tap roots, extending far deeper than 1 m. I am concerned that the plants will fail to thrive and may eventually be overtaken by rank grass and weeds. At this point, mitigation duties will only be able to rely on the acoustic fence, and any existing retained vegetation.

Vegetation monitoring and maintenance will be critical. The Applicant's landscape contractor state that they will maintain the planting for 3 months (RFI response point 6). This is very brief. The site is required to be maintained for two years following issue of the Section 224 Certificate ('defects liability period') as a minimum. Prior to issue of the Section 224, the site will have been planted. If consent is granted, it would be beneficial for the Applicant that this planting is maintained up to this point to avoid costly maintenance/plant replacement being required in the defects liability period. As such, the maintenance of the planting should occur regularly for longer than 2 years overall.

5. Peer Reviewer's Summary of Potential Visual Effects

The following sets out what in my opinion the visual effects will be arising from the Proposal beyond what could occur in an expected post subdivision scenario and why. The following assumes 11.6 m – 18 m high buildings (above the new site level) will be constructed at the same time. The following also assumes the bund will be improved from its current condition, or replaced, providing for adequate plant establishment. Otherwise, the 'initial' visual effects set out below will prevail into the long term. The rankings below use the same continuum / definitions that are included in the VIA under Section 2.3 for consistency. I have included the widely accepted seven-point scale of effects with equivalent RMA effects from the NZILA landscape assessment guidelines: Te Tangi a te Manu (**Figure 1**).

Figure 1

<u>Views from fifteen Ferry Road dwellings within receiving environment (nos. 853 – 909 Ferry Road) - long term, fixed views (my Attachment 1, viewpoint 1)</u>

'**Moderate**[18] adverse effects. This is due to loss of the visibility of the majority of the Montgomery Spur ridgeline. Buildings will dominate part of the Port Hills Backdrop beyond what would occur in an expected post subdivision scenario. The north-south 'stepping effect' proposed will not benefit these parties. The 11 m height limit and extent of the 11 m height limit area provides for buildings to sit below the ridgeline which is a favourable outcome, where the attributes and values of the contextual landscape will be largely retained. Mitigation planting will have a negligible effect from here (my **Attachment 3, upper image**).

<u>Views from Gould Crescent dwellings within receiving environment (nos. 32 – 38, 44, 44A, 52 and 54 Gould Crescent) - long term, fixed views (my Attachment 1)</u>

[18] Moderate – effects are discernible and have an effect on the quality of the view but with the main 'view qualities' still intact.

'**Moderate**' adverse effects initially, reducing over time to '**Low-Moderate**'[19]. This is due to the buildings being closer and higher. The 11.6 m high 'front rank' will be approximately 13-16 m closer than where the stacked containers extend currently. Due to the effects of perspective, the encroachment will be apparent, where the visual effects of increased bulk and scale will come into play. Over time the additional mitigation planting will help to screen and offset the effects of increased building height and proximity, although the upper parts of the buildings will remain visible. (my **Attachments 5 and 6 lower image**).

Views from remainder of Gould Crescent dwellings within receiving environment - long term, fixed views (my Attachment 1)

'**Moderate-Low**' adverse effects initially, reducing over time to '**Low**'[20]. The buildings will be seen through gaps in the residential development. In an expected post subdivision scenario, buildings in the 11 m height area would be barely visible. The 18 m high buildings will be partly visible from further away where the sightlines are flatter and from second storeys. Over time the additional mitigation planting will help to screen and offset the effects of increased building height and proximity, although the upper parts of the buildings will remain visible (my **Attachment 5 upper image, Attachment 6**).

Views from Long Street and Barton Street dwellings within receiving environment - long term, fixed views (my Attachment 1)

'**Moderate**' adverse effects initially, reducing over time to '**Low**'. This is due to the buildings being closer and higher. Buildings will tend to 'loom' above the river environment. For these parties' outlook, the river environment doubtless provides high amenity value, possibly evident in the general absence of high front fences. Over time the additional mitigation planting will help to screen the effects of the higher, closer built forms (my **Attachment 9 and Attachment 10 upper image**).

Views from travellers on the road network, including cyclists and pedestrians within receiving environment - transient, short-term views (my Attachment 1)

'**Low**' adverse effects initially, reducing over time to '**Very Low**'[21]. This is due to the transient nature of views to the Proposal which will often be glimpses, the screening effects of existing intervening buildings and planting. Over time the additional mitigation planting will help to offset the effects of or partially screen the higher built forms from view (my **Attachments 2 - 10**).

Views from travellers on Tunnel Road / SH74 within receiving environment - transient, short-term views (my Attachment 1)

'**Low**' adverse effects initially, reducing over time to '**Very Low**'. This is due to the transient nature of views to the Proposal which will often be at open road speeds. Over time the additional mitigation planting will help to offset the effects of or screen the higher built forms due to the steep view angles from the road.

Views from recreationists on the public Tow Path and Tow Path Reserve - transient, short to medium-term views (my Attachment 1)

'**Low**' adverse effects. This is due to loss of the visibility of part of the Montgomery Spur ridgeline. Buildings will dominate part of the Port Hills Backdrop beyond what would occur in an expected post subdivision scenario. The Proposal will be seen in context of the historic reserve, river environment when stationary particularly. Mitigation planting will have a negligible effect from here (my **Attachment 3, lower image, and Attachment 4, upper image**).

Recreationists on the public riverside paths including the footbridge over the 'Woolston Cut', Gould Reserve, 'Woolston Cut' (constructed) riverbank area, within receiving environment - transient, short-medium[22] term views (my Attachment 1)

[19] Moderate-Low – effects are discernible and start to adversely affect viewer experience.
[20] Low – effects which are discernible but do not adversely affect the viewer experience.
[21] Very Low – effects which are negligible or are not readily discernible.
[22] When passing through an area and occasionally stopping where there may be open space, seating, interpretation etc.

'**Low**' adverse effects initially, reducing over time to '**Very Low**'. This is due to the transient nature of views to the Proposal, intervening vegetation and buildings. Over time the additional mitigation planting will help to offset the effects of or screen the higher built forms due to the steep view angles from locations close to the site.

Recreationists on the public riverside paths on both sides of the Opawaho / Heathcote River within receiving environment - transient, short-medium[23] term views (my **Attachment 1**)

'**Moderate**' adverse effects initially, reducing over time to '**Very Low**'. This is due to the proximity of the 2.4 m acoustic fence which introduces an obvious built structure to an otherwise natural environment and the visibility of the buildings 'looming' above the top of the fence. These effects are mitigated by the transient nature of views and the partial screening effect of existing vegetation. Over time the additional mitigation planting, when 8 m high will likely screen the fence and buildings from view (my **Attachment 5, lower image and Attachment 9, upper image**).

6. Loose Stockpiled Material

The Applicant has recently provided additional information regarding a permitted scenario where loose material may be stockpiled including inside the 11 m height limit area where the stockpiled material may exceed 11 m, when it is outside the definition of a 'building'.

I agree that stockpiling loose, uncontained material at heights exceeding what is proposed is one possible outcome for the site. I also note that such stockpiles would have a natural angle of repose, on other words, have sloped sides, that would better mimic natural landforms such as the irregular crater rim landform. As such, this situation, and the visual effects in terms of bulk and scale would be different from a constructed building (or containers) which can be erected with vertical sides, appearing 'blockier'. In the latter situation, there would be a greater level of bulk and scale effects. The Applicant has provided several photographs of loose outdoor storage material including scrap metal and crushed concrete that has such angles of repose. Of note, Figure 3 from the Applicant's RFI 'Response B' illustrates a scrap metal pile beside Ruru Lawn Cemetery at 150 Maces Road. I observed this on site on 7 August and it appeared to be closer to 9 - 10 m in height, not 12 – 14 m high as stated, when using the green 1.8 m high boundary fence in front as a relative height.

In my opinion, shipping containers at 11.6 m - 18 m high within the 11 m height limit area would have marginally worse visual effects than stockpiled loose material, due to the angle of repose of the loose materials. However, this effects conclusion is 'in principle' only as insufficient evidence has been provided by the Applicant to be any more certain.

7. Conclusion

The purpose of this peer review and additional visual assessment input is to provide the decision maker with further information regarding the Proposal's potential visual effects. The Portlink Industrial Park Outline Development Plan includes the provision of a generous building setback from the river. Unfortunately, much of that area has been paved over by the Applicant precluding any planting.

Local amenity values include an outlook to the Opawaho / Heathcote River and the Port Hills which will be impinged upon to varying degrees by the Proposal. To further ensure amenity levels are maintained, the ODP includes an area of reduced building height to avoid industrial buildings visibly dominating the natural river environment and overly interrupting Port Hills vistas.

In my opinion, the Proposal departs from the primary intent of the ODP by encroaching into the Green Space setback with a proposal to construct over-height buildings. Other industrial 'buildings' at the same heights as proposed may include the storage of various materials retained inside structures such as pallets, pipes, construction timber, logs, loose aggregates, scrapped vehicles and scrap metal and the like. Another permitted scenario would be to pile up loose / uncontained material with no height limit outside the green space area. In my opinion, the visual effects of loose outdoor storage

[23] When passing through an area and occasionally stopping where there may be open space, seating, interpretation etc.

materials will be marginally better than shipping containers, due to shipping containers' bulk and visual 'solidity'. As such, shipping containers form a non-fanciful worse-case scenario in my opinion. Permanent buildings at the heights as proposed would be a best-case scenario relatively.

The proposed 11.6 m – 18 m high buildings would be approximately 13 -16 m closer to the river / public reserve than what is permitted. Given the site filling / ground level raise of up to 2 m, 11.6 m – 18 m high buildings within the 11 m Height Limit Area will be difficult to screen adequately for some parties within the receiving environment.

My conclusion is that the Proposal as it is currently presented will generate adverse visual effects that will be '**Moderate**' for some residents on Ferry Road where their views of the Port Hills / Montgomery Spur will be interrupted by over-height buildings. Over time as the mitigation planting matures, the residual effects will reduce for some parties to '**Low**' or '**Very Low**' (with both residual effects levels being less than minor). However, for some parties residual adverse effects will remain at levels greater than this.

8. Recommendations

My preference is that the specifics of the ODP regarding the 11 m building height limit and location for such buildings are followed in the Proposal. However, if the decision maker was of a mind to grant consent, I make the following recommendations which will go some way to reduce adverse visual effects in my opinion:

1. An 11 m maximum building height, measured above the paved surface, within the 11 m Building Height Limit area in the ODP grading upwards from the north and east boundaries westwards and southwards respectively to a maximum height of 16 m (six containers equivalent) measured above the paved surface forming a 'building envelope' and upper 'building ceiling' (my **Attachment 11**).

   Reasons:

   (1) To mitigate the visual effects of the over-height built forms and retain views to the Montgomery Spur ridgeline when viewed from Ferry Road residences (discussed above).

   (2) To avoid bulk and scale effects of over height-built forms when viewed from Gould Crescent residences immediately to the north of the site (discussed above).

   (3) To enable the over-height buildings to be screened from view by the acoustic fence from the true right of the river.

   (4) To enable the mitigation planting to achieve a screening effect in less time.

2. The 2.4 m high acoustic fence is finished in a recessive colour.

   Reasons:

   (1) To mitigate the visual prominence and dominance of a non-natural structure within the highly natural river corridor.
   (2) To enable the proposed planting to be the focus.

3. Buildings or storage up to a height of 5.5 m (two containers equivalent) may be located in the 13 – 16 m area of existing paving / former Green Space Area to the north of the 11 m Building Height Limit Area on the ODP.

   Reasons:

   (1) To accept that the area will no longer be used as a Green Space Area.

(2) To ensure that at most two containers may be stacked here or equivalent building/s where they will be screened to most views by the bund/acoustic fence.

4. The bunding adjacent to the 11 m Building Height Limit Area in the ODP are 2 m high and constructed / reconstructed to enable planting to establish quickly and thrive, with all plants able to reach their mature heights.

   Reasons:

   (1) To ensure that the mitigation planting establishes, thrives and can mature to natural heights to achieve a satisfactory screening effect.

Jeremy Head
Registered NZILA Landscape Architect

11 August 2023