

# Memorandum

<b>To</b>	James Beban <a href="mailto:james@urbanedgeplanning.co.nz">james@urbanedgeplanning.co.nz</a>
<b>Copy to</b>	Jamie Gillies <a href="mailto:jamie@gilliesgroup.co.nz">jamie@gilliesgroup.co.nz</a>  Brendan Hogan <a href="mailto:brendan@gilliesgroup.co.nz">brendan@gilliesgroup.co.nz</a>
<b>Subject</b>	Update - Gabites Block Plan Change
<b>Date</b>	1 March 2022
<b>From</b>	Andrew Cumming

Andrew Cumming  
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1. The Gabites Block Plan Change is a private plan change requested by Maymorn Developments Ltd and accepted by Upper Hutt City Council in December 2021. The Plan Change has been updated from the version lodged with UHCC in response to the following feedback:
  - Transport
    - Review of the Transport Report by Transport Futures (Appendix 1);
    - Consultation meeting with Waka Kotahi, Urban Edge Planning for UHCC and Maymorn Developments Ltd (online meeting held 26 January 2022);
    - Comments from UHCC Transport Team.
  - Landscape
    - Review of the Landscape Report by 4Sight Consulting (Appendix 2);
    - Meeting with 4Sight Consulting, Urban Edge Planning for UHCC and Maymorn Developments Ltd (online meeting held 27 January 2022).
  - Planning
    - Review of the planning provisions by Urban Edge Planning.
2. The updated Plan Change is available in full at the following Onedrive link:  
[https://1drv.ms/u/s!Alv-QX4dDi\\_sgul8c\\_-vHMGraDM4A?e=iibevw](https://1drv.ms/u/s!Alv-QX4dDi_sgul8c_-vHMGraDM4A?e=iibevw)
3. This memorandum provides a record and evaluation of the changes in accordance with section 32AA of the RMA.

## Transport

4. The key feedback points on transport are:
  - There are no issues in respect of motor vehicles including no issues with the intersection of Plateau Road and State Highway 2
  - There is Waka Kotahi and UHCC support for providing for off-road improvements to the Maymorn Road section of the Remutaka Rail Trail. A shared path in the road corridor would need to be constructed to a suitable standard and connectivity, particularly to Maymorn Station, is desirable.

5. Stantec and Envelope Engineering (for Maymorn Developments Ltd) have confirmed that the available width of Maymorn Rd adjacent to the Gabites Block (with the additional land proposed to be added to the road reserve from the Gabites Block) will be suitable for a shared path of 2.5m in width, which is recommended based on Austroads 'Cycling Aspects of Austroads Guides (2017)' Figure 7.2, assuming less than approximately 50 pedestrians would typically be using the path during peak hours. The 2.5m width would be separated from the road carriageway by a narrow berm and be available along most of the site frontage, except for 1 or 2 pinch points where the path may need to narrow for a short length (e.g. around the culvert just south of the Northwest Area of the Site).
6. Maymorn Developments Ltd is proposing in the Plan Change to provide the land to enable the above shared path width in the Maymorn Road corridor. Any subsequent construction of the shared path, and any connections to Plateau Road or the Maymorn Station, would need to be resolved in a developer agreement with UHCC at the time of resource consent.
7. No changes to the Plan Change are required in response to the feedback on transport.

### **Landscape**

8. The 4Sight Consulting review of the Landscape Analysis indicated general support for the Plan Change but sought clearer statements of how development recommendations were reached, clearer flow-through and summaries of recommendations, and clearer links with the Gabites Block Structure Plan.
9. Hudson Associates has updated the Landscape Analysis accordingly and described the updates in a covering memorandum (Appendix 3). The updated Landscape Analysis replaces the earlier version in its entirety and is included as Attachment 4 to the Section 32 Evaluation, available at the above Onedrive link.
10. As a result of the updated landscape consideration, the Structure Plan has been updated to show the location of the main north-south ridgeline referred to in the Plan Change provisions. Amendment 40 of the Plan Change now shows the updated Structure Plan.
11. This is an administrative change that provides a clear link with the plan provisions that refer to the ridgeline. There are no changes to the associated provisions. The change to the Structure Plan assists with achieving the purpose of the RMA because clear provisions assist with the orderly administration of the District Plan. There are no risks around uncertain or insufficient information in relation to this change. The efficiency of the change is high because the benefits outweigh the costs. The effectiveness of the change is high because the goals are contributed to. Not showing the ridgeline on the Structure Plan would be a reasonably practicable alternative but would not assist or provide clarity to District Plan users.

### **Planning**

12. Urban Edge Planning's review of the Plan Change provisions highlighted that Amendment 39 included a standard (DEV3-S2) that relied on a cross-reference to a standard in GRUZ-S4. The cross-reference created a risk that should GRUZ-S4 change, for example as a result of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, then DEV3-S2 would also change, with unintended consequences.
13. Therefore DEV3-S2 has been changed to stand alone without reference to GRUZ-S4. There is no change to the substance of DEV3-S2, it simply repeats the standard it had previously referred to. Amendment 39 of the Plan Change now shows the updated DEV3-S2.

14. This is an administrative change that does not change the standard. The change assists with achieving the purpose of the RMA because clear provisions assist with the orderly administration of the District Plan. There are no risks around uncertain or insufficient information in relation to this change. The efficiency of the change is high because the benefits outweigh the costs. The effectiveness of the change is high because the goals are contributed to. There is no reasonably practicable alternative.
15. The date on the Plan Change cover has been updated to 1 March 2022.

**Documents Referred To:**

Gabites Block Plan Change 1 March 2022	<a href="https://1drv.ms/u/s!Alv-QX4dDi_sguI8c - vIHMGrADm4A?e=iibevw">https://1drv.ms/u/s!Alv-QX4dDi_sguI8c - vIHMGrADm4A?e=iibevw</a>
Review of the Transport Report by Transport Futures	Appendix 1
Review of the Landscape Report by 4Sight Consulting	Appendix 2
Hudson Associates Memorandum	Appendix 3

**Appendix 1:**  
**Review of the Transport Report**  
**by Transport Futures**

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**Memo To:** James Beban Urban Edge Planning Ltd.

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**From:** Don Wignall Transport Futures

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**Subject:** Gabites Block: Peer Review of ITA

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**Issue Date:** 10-11-2021

**Version:** 2-0

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## Gabites Block: Peer Review of ITA

### 1.0 Context

- 1.1 A private plan change request has been made for the Gabites Block in Upper Hutt. As part of this private plan change request the applicant has provided an integrated transport assessment (ITA) of the future development form.
- 1.2 Under Plan Change 50, UHCC proposed site be mainly within the Settlement Zone, with an area of 1000m<sup>2</sup> lots around the Maymorn Rail Station and the escarpment protected through a General Rural Zone <https://www.upperhuttcity.com/Your-Council/Plans-policies-bylaws-and-reports/District-Plan/PC50>
- 1.3 The applicant is largely maintaining this development form, with the exception of the following changes:
  - A small area of residential development in the north-western corner of the property (600m<sup>2</sup> average lot size)
  - The area where the 1000m<sup>2</sup> lot size would apply on the valley flats
  - A different mechanism is proposed to maintain the escarpment, with some very limited development allowed.
  - Some 1000m<sup>2</sup> allotments on the plateau.

#### Scope:

- 1.4 To address the following questions:
  - Is the methodology used in the ITA correct?
  - Is the traffic generation from the proposed development forms able to be accommodated within the local traffic network, in the context of what was proposed under Plan Change 50?
  - Will the proposed on-site roading typology operate in a safe and efficient manner?
  - Are the measures proposed within the ITA, effective in addressing the future effects from development from the site?
  - Are there any matters of concern from a traffic safety perspective?

## 2.0 Inputs

### 2.1 Document reviewed:

- Gabites Block Plan Change Integrated Transport Assessment, Maymorn Developments Ltd, October 2021

### 2.2 References consulted:

- Gabites Block Private Plan Change, Landscape Analysis, October 2021
- NZTA RR 422, Integrated Transport Assessment Guidelines, November 2010
- NZTA RR 453, Trips and parking related to land use, November 2011
- UHCC MAPPING: DRAFT PC50 Proposed Zoning vs. Current DP Zoning [DRAFT PC50 Proposed Zoning vs. Current DP Zoning | Draft PC50 Zoning and Engagement \(arcgis.com\)](#) Accessed November 2021
- UHCC, Rural and Residential Review: Plan Change 50, Assessment of Transport-related Provisions v3.4, July 2021
- UHCC, Issues and Opportunities for the Rural and Residential Review, Rural Edition, April 2020 WCC, Code of Practice for Land Development, Appendix C Road Design and Construction, December 2021

## 3.0 Review

### *Is the methodology used in the ITA correct?*

3.1 In overall terms yes. For the traffic analysis, best practice has been followed by undertaking future year (2028) forecasting, consulting a wider network assignment model (TRACKS) and assessing intersection capacity using a more detailed model (SIDRA).

3.2 Some improvements to the ITA would have been useful, including:

- (i) The provision of a clear schedule of differences between the PC50 proposals and the applicant's proposals. It appears (from separate enquiry) that the total number and type of new dwellings proposed by the applicant is consistent with expectations for the PC50 proposals.
- (ii) The estimated traffic generation from the site in the ITA classifies the type of residential in the Gabites Block as outer-suburban, although other documentation (PC50 published material and the applicant's Landscape Analysis) refers to the residential type as rural. The implications of reclassifying the residential type to rural, based for example on RR 453 Table 7.4, could be to increase forecast traffic generation rates substantially, although the reference to specific Upper Hutt residential catchment trip rates is noted. Uncertainties in the assumptions made in the ITA in respect of traffic generation, distribution, assignment and timing could have usefully been addressed through sensitivity testing.
- (iii) In addition to vehicle generation assessment, it would be useful to assess the likely scale of generated trips by mode (car driver, car passenger, walking, cycling, bus, rail) and to estimate the expected distribution of these trips.
- (iv) The ITA could have more clearly addressed deficiencies in the local transport network which are likely to be relevant to the development of the Gabites Block. For example, the current 100km/hr speed environment along Maymorn Road is only referred to 'in passing' in the ITA, and a discussion on what would make a pedestrian-friendly speed environment, and how connections will be made along Maymorn Road for pedestrians and cyclists would be would have been helpful. The poor current access to Maymorn Rail

Station for vehicles and other modes (pedestrians, cars, bikes, buses) also warrants more discussion than a single reference to a shared path 'demarcated crossing point'. The lack of bus services on Maymorn Road also needs discussion and the fact that rail replacement bus services can only be accessed on SH2, approximately 2 km from the rail station.

*Is the traffic generation from the proposed development forms able to be accommodated within the local traffic network, in the context of what was proposed under Plan Change 50?*

- 3.3 The answer is yes, based on the ITA analysis and with reference to the earlier modelling undertaken for the earlier PC50 Assessment of Transport-related Provisions. The overall traffic generation forecasts from the Gabites Block development are low, the local road network operates (in general) well within capacity.

*Will the proposed on-site roading typology operate in a safe and efficient manner?*

- 3.4 The expectation is that the layout and arrangement of internal roads and their connections to the local road network will operate safely and efficiently. This is based on the illustrative plan of road connections (ITA Appendix A), typical reserve widths / cross sections (ITA Appendix C) and the ITA intentions in respect of intersection sight distance requirements (ITA 9.0). In practice, approvals will be needed from UHCC acting as road controlling authority, to ensure standards for adoption are met through detailed design.
- 3.5 The information provided by the applicant does not describe what the speed environment will be within the site or when footpaths on both sides of internal roads, representing best practice, will be provided.

*Are the measures proposed within the ITA, effective in addressing the future effects from development from the site?*

- 3.6 For traffic, the intersection measures proposed in the ITA, are likely (subject to detailed design) to be effective in facilitating vehicular access to and from Maymorn Road. Some potential (minor) effects of increased traffic movements at the intersection of SH2 and Plateau Road are referred to in the ITA, but these are a matter for consideration by Waka Kotahi.
- 3.7 The shared path land provision indicated along the eastern side of Maymorn Road will (when implemented) assist local walking and cycling, although it would be helpful to understand how this would integrate with crossing points and connections to footpaths, the rail station and to bus services.
- 3.8 To facilitate future bus access along Maymorn Road and also potentially, within primary roads within the development, a 7m carriageway width could be considered as future new road designs are implemented.
- 3.9 The ITA does not refer to possible connections to a 'village precinct', potentially involving densification and mixed use around Maymorn Rail Station (Landscape Analysis, Page 39).

*Are there any matters of concern from a traffic safety perspective?*

- 3.10 Pedestrian and cyclist access and crossing movements on Maymorn Road generated by the development will currently take place in a 100 km/hr speed environment. This is in contrast to Plateau Road being 50 km/hr and SH2 being 80 km/hr. This may be inappropriate and is likely to benefit from review.
- 3.11 Monitoring of safety at the SH2/Plateau Road intersection would be useful, to assess any potential effects of future traffic movement increases.

## **4.0 Findings**

- 4.1 The ITA, together with other considerations, demonstrate the Gabites Block can be developed, based on the applicant's proposals, without associated traffic generation unduly impacting the local road network.
- 4.2 Considerations for other modes are not comprehensively addressed by the ITA, although it is accepted that a number of issues arising, such as the 100km/hr speed environment on Maymorn Road adjacent to the development, and improving facilities at the rail station, may require inputs by others.

**Appendix 2:**  
**Review of the Landscape Report**  
**by 4Sight Consulting**

**From:** [James Beban](#)  
**To:** [andrew.cumming.nz@gmail.com](mailto:andrew.cumming.nz@gmail.com)  
**Subject:** Fw: Gabites Block - Landscape RFI Points & Preliminary Matters  
**Date:** Wednesday, 22 December 2021 8:04:44 pm  
**Attachments:** [image001.png](#)  
[Outlook-cxzk22ez.png](#)

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Hi Drew

I am sorry for the delay in sending this through. It has been manic. Below are the questions from the Landscape Architect. I need to dive into some detail around what the points are and read them in conjunction with the landscape assessment. However, if you want to respond on have a meeting with Rachael i can arrange if you like?

Kind Regards

**James Beban**

Director / Planner

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Hi James,

For your reference - As earlier indicated, I can indicate *general* support for the Gabites Block private plan change.

In my review of the landscape analysis document, there are some areas lacking clarity which in turn flow through to the recommendations made. Recommendations need to be more measurable/testable and relate clearly back to the aspect of landscape character or identified landscape value they are intended to address.

I note you have commented that landscape matters do come through to the AEE. However, I'm concerned about the clarity of the recommendations which the landscape related provisions would draw on (and potential flow on issues this presents).

**Preliminary landscape concerns:**

1. For the North-West Flats Area, I disagree with rationale regarding the proposed minimum 400m<sup>2</sup> lot size:
  - At p. 24 the map/plan illustrating existing residentially zoned parcel sizes, highlights only one existing 400m<sup>2</sup> parcel size among a range of larger area parcel sizes. Therefore, a comparative contextual pattern of 400m<sup>2</sup> lots is not demonstrated.
  - Character analysis at p. 25 relies on somewhat narrow 900m<sup>2</sup> lots (downplaying any anticipated greater separation between dwellings) for comparison against 400m<sup>2</sup> allotments of the same width. A key comparative factor, being the greater opportunity for mid-block planting within/afforded by larger lots, is missing from the comparison. Instead, the use of planting to softening the appearance of the built form is reliant on berm planting and frontage posts and rail fencing (and therefore just as easily achieved at either density, not any more relevant for 400m<sup>2</sup> lots). Berm planting and front fencing are considered more secondary (supporting) factors when weighing up the outcomes of different development densities. The 400m<sup>2</sup> allotments are also depicted without driveways, overemphasising the amenity afforded by the frontage landscape treatment.
  - A reduced minimum lot size to 400m<sup>2</sup> also sets up an increased issue of reverse sensitivity opposite the existing industrial area
  
2. The landscape analysis document does not demonstrate sufficient rationale that there is capacity for hillside area's proposed density (minimum 1ha lots), noting the rural/open space character afforded by the southwest facing hillside(within the site) in this landscape setting. I am not stating complete disagreement with a reduction from 20ha minimum lots, but that the capacity for (and potential level of effects) of the proposed density is not sufficiently set out. A minimum average lot size should also be set out for this area.

**Landscape related RFI points are:**

1. Please clarify the intent of the 'development potential' pages of the Landscape Analysis document. Development potential statements and imagery (showing residential and/or medium density rather than rural residential development), particularly for valley flats and station flats area, do not read as consistent with landscape capacity/proposed plan change findings and the densities set out by the structure plan. What is the role of these differing density approaches in providing landscape advice for the private plan change?
  
2. Aligned with this, please clarify the reference to Station Flats higher density (minimum lot size not specified) on the 'Landscape Potential for Development' plan (p.40), and also for some 'medium density' housing with lots down to 400m<sup>2</sup> (p. 43) as these points do not inform the structure plan. Also, the location and extent of medium density, within the Station Flats area, that the landscape document is leaning towards with this reference is not set out.
  
3. Please either provide consistent density references, for example reference to Valley Flats density to confirm landscape perspective for this area **or** clarify differing references: i.e., minimum lot size of 1000m<sup>2</sup> p. 40 'landscape potential for development'. Reference to 2000m<sup>2</sup> with some lots at 1000m<sup>2</sup> p. 45, High density appropriate in locations.... P. 46 recommendations

Min of 2000m2 on the structure plan p. 54

4. Please clarify (pull together) recommendations for the different areas of the site. Recommendations for different areas noted through the report do not entirely come through or line up with recommendations ending the document (from p. 53). These recommendations will need input from a planner to ensure they are measurable and testable (for subsequent provisions), i.e., that relevant identified landscape character/values are addressed.

For example -

Station Flats Area: capacity for medium density housing at p. 43 recommendations. However, 1000m2 lots are illustrated at p. 56 (with access clustered to increase 'perceived openness'). Earlier references to higher density for the Valley Flats area do not come through to p. 57 (2000m2 lots illustrated).

5. To ensure that spatial landscape matters (i.e., walkways and reserves networks, significant natural areas, and drainage networks are captured) the structure plan (p.54) should indicate relevant layers from the 'Landscape Potential for Development' plan (p.40). This is further referenced elsewhere in the document, for example recommendations to 'provide open spaces with high quality linkages for walking and cycling', p.46 (Valley Flats Area).

Ngā mihi,

Rachael Annan

Senior Landscape Planner

Mobile: 027 535 0720

My hours are school hours on Mondays, Wednesdays and Thursdays and I work until 4:30pm on Tuesdays. However, I do check messages and have some flexibility outside these hours.



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**Appendix 3:**  
**Hudson Associates Memorandum**

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## **Memo: Changes to Landscape Report**

**1 March 2022**

### **Gabites Block Plan Change**

1. Following our meeting with the Landscape reviewer (Rachael Annan with 4Sight Consulting) on 27/01/22 we have made several changes to the Landscape Report to reflect the feedback we received.

#### **NORTH-WEST AREA**

2. Residential character analysis amended to only reflect existing environment characteristics: narrow lots and subdivided lots [pg.31]. As indicated in the plan drawing [pg.30] dwellings are most typically located close to the road. In combination with the section drawings, this demonstrates that while lot sizes vary greatly the landscape character when experienced from the road is predominantly residential and does not appear low density.
3. Landscape capacity of north-west area outlined in more detail describing the relatively contained setting, proximity to residential and light-industrial activities [pg.48].
4. Section drawings [pg.49] from the residential character analysis are adapted here to communicate the North-West area's residential capacity. This visually demonstrates that the North-West lots would have the same perceived density as the residential areas to the north, in reference to the analysis on pg.30-31. Additionally, it demonstrates that clustering access reduces the perception of urban encroachment, by limiting the dominance of residential elements when travelling along Maymorn Road. Furthermore, that permeable roadside planting can be used to integrate residential development, complementing the natural backdropping hillside.
5. Reverse sensitivity addressed in relation to industrial activity [pg.48].

#### **DISTINCTION BETWEEN LANDSCAPE VALUES, CAPACITY & MASTER PLANNING**

6. The landscape values have now been clearly summarised at the end of the Existing Environment section [pg.43]. This includes Residential Character, Rural Lifestyle Character, Natural Setting, Recreation, and Connectivity.

7. The *'Landscape Capacity'* pages now clearly outline how the landscape characteristics and values contribute to development sensitivity and capacity [pg.46-57].
8. *'Landscape Development Potential'* drawing is now on a page called *'Master Planning'* [pg.57], and now clearly follows on from the conclusions drawn in the *'Landscape Capacity'* pages. These findings are reflected on, in relation to Plan Change 50 [pg.56], prior to the Landscape Master Plan [pg.57].
9. The imagery previously included in the *'Landscape Capacity'* had the potential to be misconstrued as indicative of what is proposed in the Structure Plan. This imagery has now been amended to communicate what is proposed in the Structure Plan and has been moved to the relevant section [pg.62-63,65, 67-69].
10. Plans and section drawings of *'Valley Flats'* [pg.64], *'Station Flats'* [pg.66], and *'Typical Roding'* [pg.70-71], are now also used to communicate the Structure Plan.

#### **HILLSIDE CAPACITY**

11. The methodology contributing to landscape capacity of the Hillside area, which has fed into the Structure Plan, has now been outlined [pg.55]. This includes estimating the potential densities of dwellings, without compromising the value of the hillside as a natural backdrop, by identifying possible house sites with the following parameters:
  - Avoidance of Gabites Block Natural Areas.
  - Lots shaped around the topography, for example, to the south-east lots should be restricted to one allotment per spur, with property boundaries discreetly located.
  - Dwellings sensitively located at the base of the hillside, set down below the skyline, or screened by protected vegetation.
  - More prominent areas of the hill face to remain free from dwellings (i.e., bulk of south-east face).
12. This analysis work demonstrates that the Hillside area has the capacity to support approximately 8 lots across the hillside, at a minimum of 1ha, if suitable design controls are employed to minimise the effects of development.

#### **GABITES BLOCK NATURAL AREAS**

13. The *'Landscape Character Analysis'* drawing has been updated to include the extents of the Gabites Block Natural Areas [pg.28].
14. Gabites Block Natural Areas are specifically listed under the natural setting landscape value [pg.43]. These are relevant to the Hilltops and Hillside areas [pg.47].
15. The *'Hillside Density Analysis'* drawing includes the extents of the Gabites Block Natural Areas [pg.55].
16. The *'Landscape Development Potential'* drawing has been updated to include the extents of the Gabites Block Natural Areas [pg.57].

## STRUCTURE PLAN

17. The Structure Plan landscape overlays have now been described in more detail [pg.60].
18. The Structure Plan development areas have now been more clearly introduced [pg.60].
19. The Structure Plan development areas are then illustrated with precedent imagery [pg.62-69].
20. The Structure Plan continues to show the indicative Concept Shared Path along Maymorn Road which links with Tunnel Gully Track (Pakuratahi Forest) [pg.61].
21. The Structure Plan now indicates the ridgeline [pg.61] in reference to the provision 'DEV3-P2'.
22. The minimum average lot size for the Hillside Area originally specified the capacity on pg.51 of the original report: "*capacity to support no less than an average lot size of 2.5ha, allowing for a minimum site size of 1ha for areas of lower elevation, and further to the west*". This has been carried through into the Structure Plan in the Landscape Report [pg.61].
23. The minimum average lot size has now been added to the North-West Flats in the Structure Plan in the Landscape Report [pg.61].

## LANDSCAPE ASSESSMENT / PERFORMANCE CRITERIA

24. A specific Landscape Assessment section has been created.
25. The first page of the Landscape Assessment section communicates how the plan change provisions require a Landscape Management Plan as a condition of resource consent [pg.74]. The Landscape Management Plan is required to set out how the long term green backdrop would be achieved and managed.
26. Landscape performance criteria is outlined, but these should also be read in conjunction with the Plan Change provisions which have been informed by this assessment [pg.74]. This page should be used to inform the Landscape Management Plan.
27. Landscape assessment for each development area then follows on from this [pg.76-81]. Further recommendations are integrated within the landscape assessment, where matters are not covered by the plan change provisions [pg.76-81].
28. Additional recommendations are made for the resource consent design [pg.84]:
  - Incorporation of street planting and water-sensitive urban design strategies, which are not specifically included in the Plan Change provisions.
  - Revegetation of Blaikie Stream tributary for enhancing the environment and providing amenity, which is not included in the Plan Change provisions.
  - Establishment of a well-connected open space network, including adjacent to Blaikie Stream tributary which is not included in the Plan Change provisions.

- Any potential connection with Pākuratahi Forest tracks should either be utilised, or set aside to future access (i.e., paper road). Only the indicative shared path is included in the Structure Plan.

### **CONCLUSION**

29. We hope that this sufficiently addresses the concerns raised in the landscape review process.
30. If you have any questions or require further clarification, please do not hesitate to get in touch.

John Hudson (Hudson Associates)

01 March 2022