

20 July 2020

**REF:** Proposed Plan Change, Farmers Corner, Ashburton  
**TO:** Ashburton District Council  
**FROM:** Paul Smith, Registered Landscape Architect – Rough & Milne  
Landscape Architects  
**SUBJECT:** Landscape Assessment Peer Review

## **PROPOSED PLAN CHANGE TO CREATE A RURAL TOURISM ZONE AT FARMERS CORNER, ASHBURTON**

### **Introduction**

Farmers Corner Ltd (**FCL**) have requested a Private Plan Change (**PPC**) in relation to the Ashburton District Plan (**ADC**). The PPC seeks to create a Rural Tourism Zone on a 21ha rural property located on the corner of Long Beach Road and State Highway 1, known as Farmers Corner (**the site**).

This report is a peer review of the Landscape Assessment prepared by Robert Watson Landscape Architects dated 18 April 2019 (**the RW Report**), that formed part of the PPC Application. To inform this peer review of the RW report, a site visit was undertaken on the 29<sup>th</sup> of June 2020 and the following documents have been referred to:

- Plan Change Application<sup>1</sup>
- Appendix 1 – Rural Tourism Chapter<sup>2</sup>
- Appendix 4 – Concept Plan<sup>3</sup>
- Response to RFI dated 13 November 2020<sup>4</sup>

Through reviewing the RW report, it was found that potential effects on landscape character were not clearly covered, however all potential effects on visual amenity have been considered. This

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<sup>1</sup> *Incite Resource and Environmental Management. Proposed Plan Change Request, Farmers Corner Development Limited, Corner of Hinds (State Highway 1) & Longbeach Rd, Tinwald, Ashburton. August 2019 (Updated November 2019).*

<sup>2</sup> *Appendix 1: Proposed new Rural Tourism Zone Chapter.*

<sup>3</sup> *Appendix 4: Concept Plan.*

<sup>4</sup> *Incite Resource and Environmental Management, Liz White. Private Plan Change 3 – Farmers Corner – Response to Request for Further Information. 13 November 2019.*

report gives review comments on the RW report and discusses its methodology, findings and conclusions. For the sake of conciseness, this report does not repeat aspects of the RW report that are agreed with. This report follows the general format of the RW report.

## Methodology

The RW report does not specify the methodology used, however it is formatted in a logical manner, as per industry standards, generally following the methodology in the NZILA's Best Practice Guide<sup>5</sup> and the Guidelines for Landscape and Visual Impact Assessment (**GLVIA**)<sup>6</sup>.

Also, it is evident in Section 3.8 and 3.9 that the RW report uses the descriptors provided on the Quality Planning website<sup>7</sup> to describe degrees of effect. These descriptors include definitions and are easy follow, however, do not follow the NZILA guidelines.

Terminology used to describe the degree of effects in this peer review are included in Appendix 1.

## Proposal

The RW report includes an Outline Development Plan and a brief description of the proposed use and type of development which is intended to occur within the three development areas. Further details relevant to a landscape and visual effects assessment are described throughout the report. Formatting a report in this manner reduces its length and focuses on the issues at hand, which is appreciated. However, it would have been useful for the below information to be included in the proposal.

- The site area, being 21ha, is mentioned in the introduction. For ease of reading, it would have been helpful for the proposal to include the size of the three development areas. This could have been done using dimensions on the Outline Development Plan. Taken measurements from the Outline Development Plan, I have calculated these being:
  - Area 1 is 4.0ha in area. 25% of this area is 10,000m<sup>2</sup>.
  - Area 2 is 8.4ha in area. 10% of this area is 8,400m<sup>2</sup> which allows for building coverage. 5% of this area is 4,200m<sup>2</sup> which allows for impervious surfaces
  - Area 3 is 8.6ha in area. 5% of this area is 4,300m<sup>2</sup>.
  - The site is 21ha in area. The PPC will allow for 26,900m<sup>2</sup> or 12.8% of building coverage and impervious surface.
- A maximum number of 80 visitor accommodation units in Area 2.

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<sup>5</sup> *New Zealand Institute of Landscape Architects Best Practice Note 10.1 – Landscape Assessment and Sustainable Management.*

<sup>6</sup> *Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013. Landscape Institute and the Institute of Environmental Management and Assessment.*

<sup>7</sup> <https://qualityplanning.org.nz/node/837>

- Further detail regarding the proposed boundary treatment should have been included because it is heavily relied upon for visual mitigation. Further to this, the ‘new boundary planting’ illustrated on the Outline Development Plan is not illustrated at 15m wide.
- The PPC provides flexibility in future built form within the site, which has been discussed. It would have been helpful to discuss the potential use of future built form. I consider that the central hub building, commercial building, specifically its kitchen, 80 accommodation units and a broad sweeping garden throughout the remainder of the site will allow for conferences, weddings and the like. These types of activities may result in adverse effects in their own right and therefore should be taken into consideration in the assessment.

## **The Receiving Environment**

The receiving environment is described in Section 2 of the RW report, which is generally agreed with. However, is considered to be missing ‘landscape context’ information to assist understanding the landscape effects section, specifically, the RW report is missing:

- The landscape values of the site and its surrounds.
- A description of the landscape’s ability to absorb change.
- A description of activities that may occur on site as of right, including:
  - an 8m high shelterbelt being located around the perimeter of the site, albeit fanciful that the Long Beach Road and SH1 corner would be enclosed, and
  - a large-scale garden populating the majority of site, which would be in keeping with the commercial use of the site, which may be similar to Broadfield Gardens located between Prebbleton and Rolleston.
- The Rural B Zone rules regarding site coverage for buildings and impervious surfaces, being 5%, or in this case 10,500m<sup>2</sup>.
- The height, footprint size and colour of the commercial building.

## **Assessment of Effects**

The Assessment of Effects is described in Section 3 of the RW report. The assessment in Sections 3.1 – 3.7 does not appropriately separate the landscape effects from the visual amenity effects.

***Landscape Effects*** are changes in the physical landscape, that may alter its attributes, values, character and / or the ‘experience’ of the landscape.

***Visual Effects*** are changes to views, which may change the visual amenity experienced by people.

The summary tables in Sections 3.8 and 3.9, endeavours to separate these effects from one another, however, it was found that mitigation measures used to reduce visual effects are incorrectly used to mitigate landscape effects.

## Building Coverage

Attachment A in the RFI response visually illustrates the maximum extent of built form within Areas 1 and 2 of the site, and the approximate dimensions of maximum building coverage is included above. Without knowing this information, it is difficult to understand what the PPC provides for within these three areas and how this relates to the existing zoning provisions. With regard to each of the three areas maximum building coverage and impervious surfaces, it's worthwhile mentioning:

- Area 1. Based on 18.7% of 4ha, the commercial building, toilet block and carpark are approximately 7,500m<sup>2</sup> in area. The PPC will enable an additional 2,500m<sup>2</sup> of building coverage and impervious surfaces.
- Area 2 rules (3A.9.4 and 3A.10.7) allows for 8,400m<sup>2</sup> building coverage and 4,200m<sup>2</sup> of impervious surfaces. In general, this will allow for the current commercial building, toilet block and carpark to be replicated and an additional 5,100m<sup>2</sup> of building coverage and impervious surfaces.
- Regarding Area 3, the description of effects basis its conclusions on this area being somehow separate from the other two areas, therefore, retaining a 5%, or 4,300m<sup>2</sup> building coverage and impervious surfaces is appropriate. This description does not include the maximum building coverage within the site and does not consider cumulative effects. Additionally, the revised concept plans in the RFI do not illustrate buildings within this area.

With regard to building coverage, the RW report does not describe the potential reduction in open character, characterised by lack of trees as well as lack of structures, that may result, nor does it describe the change in land use activities and how this may affect the landscape character and the values of the site and its surrounds. I consider that the PPC will change the current rural character of the site to one associated with tourism or event activities. This change in character will be contained to the site.

I consider that clustering built form in Areas 1 and 2, and leaving Area 3 free of buildings will avoid the potential reduction in open space and sprawl of built form throughout most of the site, which will assist in retaining the open space values associated with the site. In addition, I consider that the existing activities and the permitted baseline lends the site to absorb non rural activities, such as weddings, conferences and the like. However, this is dependent on a number of other factors mentioned below. As such, it is recommended that Area 3 does not contain any buildings.

## Building Height

Maximum building height, as outlined in the PPC is 9m (3A.10.6). When undertaking a site visit on 29 June 2020 the applicant provided a scissor lift to understand what a 9m height limit would look like from the neighbouring property to the south, which was appreciated.

In addition to this, the RW report could have assisted in providing the height of the commercial building, as to understand the overall bulk and scale of this building, which could be used as an example for development within Area 2. Also, it would have assisted in understanding if the 9m

height limit in Area 2 would be visible behind the commercial building when viewed from the entry point into Farmers Corner off Long Beach Road.

### Building Appearance

I disagree that a Light Reflectivity Value (**LRV**) of 40% on its own will minimise the visual prominence and glare on the receiving environment. This is because:

- Without restricting the hue, the final colour can highlight a future building.
- Reflectivity values of a colour and glare are different. Reflectance refers to the amount of white or black within a colour. Glare refers to the effect which occurs when light is reflected from a smooth surface. As such a dark colour can still result in a high amount of glare.

The Queenstown Lakes District Council have an appropriate colour guideline chart<sup>8</sup> which assists with restricting colours in their rural landscape. I acknowledge this is for a different landscape setting. However, I consider it a useful tool to use when understanding LRV's and Glare.

Regarding the site, future built form may be designed to cohesively match the commercial building as to enhance internal amenity. However, without the commercial buildings colour and its LRV, it is unknown if this colour can be included in an assessment.

Due to the above, I consider that the proposed LRV restrictions on their own are not robust enough to reduce the visual prominence of built form when seen from the surrounding areas.

### Internal Landscaping and Building Setbacks

I consider it appropriate to mention these two aspects of the PPC together as in some instances they relate.

It is my understanding that the landscape treatment will create a 15m deep buffer along Area 2 and 3's boundaries. Therefore, it is confusing why a 10m building setback from roads is proposed. To reduce potential conflicting issues in the future, I consider that the 10m building setback should be increased to 15m to be cohesive with the landscaping buffer.

A minimum 6m high predominantly native vegetation buffer will not provide full screening of a 9m high building that is not in keeping with the surrounding rural activities, nor will the vegetation tie in with rural character of the surrounding area. The proposed vegetation, in itself, may highlight the PPC. As mentioned above, a shelterbelt can be planted around the site's perimeter as of right. If this were two rows deep, maintained at a minimum height of 8m, included on the outer perimeter of the 15m buffer and planted within the first planting season post the granting of the first resource consent that would follow the PPC, it will provide the desired screening. This planting would also appear in keeping with its surrounds, provide certainty on timeframes for reducing visual effects, and allow the remainder of the vegetated treatment to provide a high degree of internal amenity.

In addition to the above, while undertaking the site visit and viewing the site from the neighbouring property to the south, 54 Long Beach Road, it was discussed that the view they enjoyed the most

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<sup>8</sup> [https://www.qldc.govt.nz/media/avrph4d5/odp-guidance\\_-\\_suitable-building-colours-and-materials-in-rural-zones.pdf](https://www.qldc.govt.nz/media/avrph4d5/odp-guidance_-_suitable-building-colours-and-materials-in-rural-zones.pdf)

was towards Little Mount Peel and Mount Peel. This view would be reduced by way of a shelterbelt. However, creating a view shaft through / over top of Area 3 to Little Mount Peel and Mount Peel would go some way to assist in protecting their amenity. It is recommended that this view shaft and rules regarding the landscape treatment in this space be included in the Outline Development Plan and PPC.

Due to the above, I consider that the vegetated treatment of the landscape buffer should be amended to include the above-mentioned shelterbelt planting and viewshaft.

### Lighting

The proposed rules relating to the 11pm curfew for lighting only relates to Area 1, which is further emphasised by RFI Proposed Rule 3A10.3 relating to Hours of Operation. Because the RW report mentions that lighting can have significant visual amenity effects on neighbours, it is unclear, how restricting lighting in Area 1 but not Area 2, will mitigate overall lighting effects.

As mentioned, the RW report does not discuss the types of activities that may take place within the site once the future development is complete, which may include conferences, weddings and the like. It may appear that the rule regarding lighting is specific to visual amenity. However, I consider this rule enforces the hours of operation which all social activities within the site must cease each day. Therefore, the amenity effects on neighbours will be worse if the hours of operation and lighting curfew does not relate to Area 2.

Due to the above, this level of detail should be taken into consideration when assessing visual amenity effects on neighbours.

### Effects on Landscape Character and Values

With regard to Table 2, I consider the following points:

- Landscape Values and Rural Character – The receiving environment description does not describe the landscape values of the site; therefore, I am unsure how the RW report comes to its conclusions on effects. The body of the report does not discuss the change in land use activities that will result from the PPC and how this will change the character of the site.

The proposed mitigation measures referred to relate to visual effects, not landscape effects. Therefore, it is unclear how these mitigation measures (MM3, MM4, MM6 and MM7) reduce the 'significant' degree of landscape effects on rural character described in the RW report. Also, I consider that the proposed building coverage and height are not mitigation measures.

- Built Structures – As mentioned the proposal does not describe the amount of built form that may occur, as such the RW report mentions 'several new buildings', in this section of the table, which is incorrect. The PPC will allow for 22,700m<sup>2</sup> of building coverage and impervious surfaces. Similar to the above, the mitigation measures relate to visual effects, not landscape effects. Therefore, it is unclear how the mitigation measures reduce the 'significant' degree of landscape effects described in the RW report.

When related to Table 1 below, a 'significant' degree of effect is considered a high degree of effect. Due to the amount of built form allowable within Areas 1 and 2, I agree with this degree of effect for Areas 1 and 2. However, overall, I consider that the reduction in open character resulting from the PPC will result in a moderate – high degree of adverse effects. Beyond the site, these effects are reduced to very low to none.

Due to the above, I consider that the mitigation measures will not reduce the initial 'significant' effects on the landscape character of the site, as described in the RW report.

### Effects on Visual Amenity

With regard to Table 3, I consider the following:

- The timeframes provided in the last two columns do not relate to any timeframes within Section 3 of the RW report, specifically a timeframe relating to when planting will take place in relation to future construction.
- As mentioned above, it is recommended that a shelterbelt two rows deep, maintained at a minimum height of 8m, included on the outer perimeter of the 15m buffer and planted within the first planting season post the approval of the first resource consent following the PPC be included. If this was adopted by the PPC, I would agree with the conclusions described in the Residual effects (post mitigation – year 5).

Due to the above, if the recommendations are included, the effects on visual amenity can be agreed with.

### **Conclusions**

The RW report does not contain all relevant information required to provide a comprehensive assessment of the potential landscape and visual effects of the PPC.

The proposed mitigation measures will reduce the visibility of the activities provided for by the PPC, however, they will not mitigate the potential adverse landscape effects. Due to this, I consider that the mitigation measures will not reduce the initial 'significant' effects on the rural character of the site. On the contrary, I consider that the current rural character of the site will change to one associated with tourism or event activities, which will be contained to the site.

To retain the open space values of the site and cluster built form within Area 1 and 2, I recommend that Area 3 shall not contain any buildings. If the recommendation is adopted, I consider that the PPC will adversely affect the landscape values of the site to a low-moderate degree.

The proposed mitigation measures will go some way to reducing visibility of the activities provided for by the PPC. Because these building will not be rural in character, it is recommended that they are screened to a higher degree. If the recommendations mentioned above are adopted in the PPC, I would agree with the degree of effects in the RW report.

## Appendix 1

The methodology and terminology used in this landscape assessment has been informed by the NZILA’s Best Practice Guide<sup>9</sup>, the GLVIA<sup>10</sup> and the methodology for landscape and visual assessment supplementary evidence by Ms Bridget Gilbert to the Environment Court in regard to Topic 2 of the Queenstown Lakes District Plan Review<sup>11</sup>. Mr Tony Milne (Director of Rough and Milne Landscape Architects) was involved as one of six landscape architects that provided comment on this evidence when it was presented during the review process.

The NZILA Best Practice Guide and the GLVIA document are recognised within the industry as providing ‘good practice guidance’ in the assessment of landscape and visual effects under the RMA. These documents recommend that a landscape and visual effects assessment uses a scale to assist in describing the degree of effect resulting from a proposal. This report has adopted Ms Bridget Gilbert’s seven-point ‘landscape effects’ and ‘visual effects’ scales, which are outlined below.

**Table 1: Landscape Effects Rating Scale**

Magnitude/Degrees	Use and Definition
Very Low	Negligible loss of or modification of key elements, features, characteristics, and/or values of the baseline. Influence of new elements on landscape character and/or landscape value is barely discernible.
Low	Very little material loss of or modification to key elements, features, characteristics and/or values. New elements integrate seamlessly into the pre-development landscape character and/or landscape values.
Moderate-Low	Minor loss of or modification of one or more key elements, features, characteristics and/or values. New elements are not uncharacteristic within the receiving landscape and do not disturb the pre-development landscape character and/or landscape values.
Moderate	Partial loss of or modification of key elements, features, characteristics and/or values. The pre-development landscape character and/or landscape value remains evident but is changed.
Moderate-High	Modifications of several key elements, features, characteristics and/or values. The pre-development landscape character and/or landscape values remain evident but materially changed.
High	Major modification or loss of most key elements, features, characteristics and/or values. Little of the pre-development landscape character remains and amounts to a significant change in the landscape character and/or landscape values.
Very High	Total loss of key elements, features, characteristics and/or values. Amounts to a very significant change in landscape character and/or landscape values.

<sup>9</sup> New Zealand Institute of Landscape Architects Best Practice Note 10.1 – Landscape Assessment and Sustainable Management.

<sup>10</sup> Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013. Landscape Institute and the Institute of Environmental Management and Assessment.

<sup>11</sup> Env-2018-331-000019. Supplementary Statement of Evidence of Bridget Mary Gilbert for Queenstown Lakes District Council Topic 2 – Rural Landscapes. 29 April 2019.



**Table 2: Visual Amenity Effects Rating Scale**

Magnitude/Degrees	Use and Definition
Very Low	Negligible loss of or modification to key elements, features and/or characteristics of the baseline. Visual influence of new elements is barely discernible.
Low	Very little material loss of or modification to key elements, features and/or characteristics. New elements integrate seamlessly into the pre-development visual environment.
Moderate-Low	Minor loss of or modification to one or more key elements, features, and/or characteristics. New elements are not uncharacteristic within the visual environment and do not disturb the pre-development visual amenity.
Moderate	Partial loss of or modification to key elements, features, and/or characteristics. The pre-development visual amenity remains evident but is changed.
Moderate-High	Modifications of several key elements, features and/or characteristics. The pre-development visual amenity remains evident but materially changed.
High	Major modification or loss of most key elements, features and/or characteristics. Little of the pre-development visual amenity remains and amounts to a significant change in visual amenity values.
Very High	Total loss of key elements, features and/or characteristics, which amounts to a very significant change in visual amenity.

**Table 3: Comparison table between Table 1 and Table 2 above, and the scale used in the RW report**

Very Low	Low	Low - Moderate	Moderate	Moderate - High	High	Very High
Less than minor		Minor	More than minor		Significant	