

22nd December 2020

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Dear Ryan

Re: Notice of Requirement: Proposed Extension to Abby Road
Peer Review of Landscape and Visual Effects

Palmerston North City Council has re-lodged a Notice of Requirement (NoR) to undertake a designation for the purpose of extending Abby Road, Palmerston North for a distance of approximately 180m such that it joins at a 'T' intersection with Johnstone Drive. The re-lodged application contains various amendments to the design following comments provided on the first application, and replaces the first application in its entirety.

To support the NoR, the Council have provided an assessment of landscape, natural character and visual amenity effects that has been undertaken by Hudson Associates, dated 4 September 2020 (Hudson Report). This letter provides a peer review of that assessment for the purposes of informing your s42A report.

Methodology

In the preparation of this peer review I read and considered the NoR as a whole, including the main report prepared by WSP (dated 7 September 2020) and the Hudson Report which has been appended within it. I also briefly considered relevant material contained within the two Transport Assessments (prepared by WSP).

I undertook a site visit in early March 2020, and then again in October 2020. I am also generally familiar with the Aokautere area, having undertaken other work in the vicinity of Abby Road in the past.

I also used publicly available aerial photography, Google Street-View, and imagery/plans provided by the applicant and applicant's experts.

The availability of information both publicly and within the application is extensive, and I consider I have enough information to undertake the peer review and provide informed recommendations. I also consider that there is enough information for submitters and the public to understand the proposal and its potential effects.

Although this report has not been prepared for the purposes of an Environment Court Hearing, I can confirm that I have read and have abided by the Court's Code of Conduct for Expert Witnesses. I consider I am suitably experienced at providing peer reviews of this nature and can provide details of this expertise if required.

For the purposes of assessing the significance of effects, I have used a seven-point scale that matches those used in the Hudson Report (Tables 1.1, 2.0, 4.0 and 5.0). This scale deliberately avoids the use of RMA terminology, but for the purposes of translation, it is largely accepted that *moderate-low* on the scale is equivalent to *minor*.



Description of Proposal

The proposal is located at the end of Abby Road, Aokautere, Palmerston North. Abby Road currently accessed from Pacific Drive, and the proposal is to link Abby Road to Johnstone Drive in order to provide efficient and logical access to the eastern side of Adderstone Reserve in order to enable recreational opportunities.

The details of the proposal are described in section 5 of the NoR. It involves:

- Earthworks for the formation of a road;
- The placement of a culvert to enable stormwater passage underneath the road; and
- The construction of a carriageway and intersection.

Some vegetation within the gully will be required to be removed. Although no plans have been provided indicating the extent of replanting, paragraph 81 of the Hudson Report recommends planting of all road embankments with species to match the native species within Manga o Tane Reserve.

It is understood from s6.3 of the NoR report that street lighting will be included, as well as pedestrian footpaths on both sides of the road. The Hudson Report also recommends the creation of a walkway through Manga o Tane Reserve to connect with SH57, however the NoR itself does not propose or allow for such a walkway. However, the re-submitted proposal changes the alignment of the designation such that it directly bounds the reserve, and therefore a walkway connection in the future is made possible.

The Hudson Report provides an assessment of two potential road alignment options, Option 1 being the “Northern Alignment” and Option 2 being the “Southern Alignment”, favouring Option 1 as being “more sympathetic to the landform”.

Landscape Context

The Hudson Report, paragraphs 32 to 49, provides a thorough description of the project site, localised vicinity and wider environment. I consider that this description is accurate and an adequate base on which to determine potential effects. Of note are the following characteristics:

- Aokautere is composed of a series of flat terraces, incised by a network of ephemeral gully and stream systems. One of these, the Abby Road Gully system contributes in a small way to the life-supporting capacity of the Manawatū River and is an essential element of the areas character and a defining feature of the Aokautere plateau.
- Aokautere Road is a main arterial road, and whilst the northern side of this road has developed completely, the southern side continues to expand with many recent and emergent developments in the area.
- The roading pattern is determined by the location and shape of the terraces. The main arterial route follows the Manawatū River, while a network of collector and local roads feed traffic onto the flat terraces. Where possible, crossing of the gullies by road is avoided.
- Considerable earthworks have reshaped the gullies for residential development. Abby Road Gully has undergone significant change from its natural form, with the natural landform of the entire gully irreversibly changed. Visually there is a distinct contrast in vegetation quality between the lower gully and the significantly modified upper head of the gully.



- Manga o Tane Reserve has been replanted with locally sourced native vegetation and left to regenerate. Over time this will restore structural complexity to the ecosystem.
- There are no sites of cultural significance in the area, however Rangitāne have expressed interest in the biodiversity and stormwater of the gully systems.

Planning Context

Both the NoR and the Hudson Report provide a comprehensive overview of the policy context. Of particular note are the following:

- Objective 1, Policy 1.1 and Policy 1.2 of the PNCC District Plan in regard to limiting the location and scale of earthworks where adverse effects may result.
- Section 7, Objective 1 of the PNCC District Plan that seeks to ensure subdivision in urban areas is consistent with integrated management of the use, development and protection of land and other natural and physical resources; and Objective 2 that seeks to ensure the safe, convenient and efficient movement of people, vehicles and goods in a high quality environment with minimum adverse effects; and Policy 2.6 which seeks to avoid, remedy and/or mitigate the adverse effects caused by alterations to the natural landform and removal of vegetation.
- Section 10, Objective 4 of the PNCC District Plan that seeks to ensure that the predominant character of the Residential Zone is not compromised by incompatible land use and development.
- There are no objectives or policies related to landscape, natural character or visual amenity effects in Section 24: Designations of the PNCC District Plan.

The site is not identified as an Outstanding Natural Landscape or Feature.

Assessment of Landscape Effects

From paragraph 60, the Hudson Report provides an assessment of effects on the biophysical landscape and landscape character. It sets out that the positioning and configuration of the road has been considered in relation to the existing and possible future landscape patterns within the surrounding area, and notes that the proposal will provide increased connectivity between existing and proposed residential areas.

The report considers the highly modified nature of the site and concludes that the proposal will not result in the adverse loss of habitat.

In terms of landscape character, the report considers that the proposal will interrupt the flow of the Abby Road Gully, although suggests that Option 1 will ensure less interruption due to the lower height in the middle of the road. Both options would place fill in the currently hollow gully and create a crossing that is not reflective of the natural patterns of the area.

The Hudson Report therefore concludes that there will be a *moderate* adverse effect on the biophysical attributes; *low* effects on vegetation, habitat and the stream bed; and overall *moderate* effects on landscape character.

I agree with the assessment that has been provided. Although vegetation and the presence of a waterway within the gully give the appearance of a natural feature, the reality is that the Abby Road Gully has been highly modified over time. Re-planting and regeneration within Manga O Tane Reserve is underway, although this is below the proposal site. The top of the gully is still in relatively poor condition, no doubt still recovering from



historical agricultural land-uses prior to the development of residential housing, as well as not being managed in the same way as the reserve or flatter terrace areas.

Having said this, the proposal will (as identified in the Hudson Report) provide a somewhat “unnatural” crossing of the gully that is generally at odds with the overall patterns of the surrounding landform (noting that this landform has been modified over time).

I therefore consider the potential landscape effects align with the description of *moderate*, that being the “alteration of one key element or feature/attribute – the composition/pattern [of the landscape] partially changed”, and I therefore concur with the findings of the Hudson Report in this regard.

Assessment of Natural Character Effects

The table included under paragraph 69 of the Hudson Report provides an assessment of the existing natural character of the Abby Road Gully in the vicinity of the proposal site. The table considers abiotic, biotic and perceptual attributes of natural character, which is consistent with current best practice assessment.

I generally concur with the Hudson Report that the crossing of the gully will result in the interruption of the natural flow of the waterway, and the longer-term (emerging) patterns and processes within the gully. There are risks of increased stormwater runoff and division of what could be a densely planted, diverse gully system.

Little documented information on Manga o Tane Reserve is available, and I am not aware of any detailed ecological assessments of the gully area since planting within the reserve has been undertaken. However, anecdotal information from PNCC staff¹ is that monitoring of the wider “Green Corridors” (which includes a number of planted tributaries and gullies in the wider area) is resulting in increased sightings of tui, ruru and kereru. From a landscape perspective, there can be little doubt that “re-naturalising” previously modified waterways is only likely to have positive outcomes. As planting in the gully continues to mature, natural character values will further enhance.

However, as the landscape is today, I agree with the effects assessment in the Hudson Report that the proposal will result in *low* effects on natural character.

Assessment of Visual Amenity Effects

As part of the assessment for notification (of both the current and prior NoR applications), I undertook a relatively detailed assessment of visual amenity effects from surrounding residential properties. I identified a number established residential properties close to the proposal around the end of Abby Road, Woodgate Court, Johnstone Drive and Ron Place that would likely have views (or partial views) of the proposal. For each property, I then applied a simple “minor” or “less than minor” rating of visual effects for the purposes of determining which properties should be notified of the proposal (should full public notification not be undertaken).

The Hudson Report does not include a detailed, property-by-property assessment of visual effects, but rather focusses in particular on visual coherence and the visual intrusion of the development on the amenity of the gully. It concludes that, overall, visual amenity effects of the proposal will be *moderate*.

¹ <https://www.stuff.co.nz/manawatu-standard/news/94919738/green-corridors-project-attracts-the-birds>



I consider that a more detailed assessment is appropriate, and I have therefore readdressed my notification assessment utilising the seven-point scale of effects adopted by the Hudson Report. In undertaking this assessment, I have also considered the potential effects of streetlights, both as visible elements during the day and as additional light sources at night. This assessment is provided as follows:

Address	Location	Brief Evaluation	Rating
14 Abby Road	Rear section, single storey dwelling located middle of Abby Road, eastern side.	Property is largely screened from the proposal by neighbouring dwellings, although some oblique views might be possible from the end of the garden.	Low
20 Abby Road	Single storey dwelling located middle of Abby Road, eastern side.	Property is largely screened from the proposal by neighbouring dwellings.	Low
22 Abby Road	Rear section, single storey dwelling located towards end of Abby Road, eastern side.	Property is tucked behind the neighbouring dwelling (24 Abby Road) and is unlikely to have any clear views towards the proposal. Some fleeting views might be possible from driveway area and from end of the garden.	Low
24 Abby Road	Rear section, single storey dwelling located near end of Abby Road, eastern side.	Difficult to clearly ascertain views from this property, but likely that due to its elevated position above the gully that views of the eastern portion of the proposal will be possible, including construction activity. Likely to see and be affected by streetlights.	Moderate-Low
26 Abby Road	Single storey dwelling located near end of Abby Road, eastern side.	Views to proposal from rear of property are restricted by boundary fences, including fence along adjacent driveway, and neighbouring dwelling. However, elevation above gully may result in some oblique views of proposal between neighbouring dwellings. Likely to see and be affected by streetlights.	Moderate-Low
28 Abby Road	Single storey dwelling located end of Abby Road, eastern side.	Directly adjacent to proposal area, although rear and side of property has 1.8m high paling fence. Would be affected by any construction to north side, but is elevated above gully and would have views across the proposal from rear. May be affected by streetlights.	Moderate-Low
35 Abby Road	Single storey dwelling located in middle of Abby Road, western side.	Semi-open front yard with mature trees on boundary, house set back from road. Limited views to proposal as a result of neighbouring and opposite dwellings.	Very-Low
37 Abby Road	Single storey dwelling located towards end of Abby Road, western side.	Open front yard, but views restricted by neighbouring and opposite dwellings. May have limited oblique views across to part of the proposal and construction.	Very-Low
39 Abby Road	Single storey dwelling located near end of Abby Road, western side.	Open front yard, but views somewhat restricted by neighbouring dwelling. May have oblique views across to proposal and construction. Likely to see streetlights.	Moderate-Low
41 Abby Road	Single storey dwelling located end of Abby Road, western side	Open front yard and driveway, some views towards proposal. Likely to see whole of proposal and construction works, including streetlights.	Moderate
25 Johnstone Drive	Single storey dwelling near to end of built development on Johnstone Drive, western side.	Property is largely screened from the proposal by neighbouring dwellings.	Very-Low
27 Johnstone Drive	Rear section, single storey dwelling, near to end of built development on Johnstone Drive, western side.	Orientation of rear boundary looks away from proposal, and views to side restricted by neighbouring dwelling. May be some oblique views from end of garden.	Very-Low
29 Johnstone Drive	Rear section, single storey dwelling, at end of built development on Johnstone Drive, western side.	Difficult to ascertain whether property is fenced on side boundary, but even so it is likely to have views over much of the proposal and see streetlights.	Moderate
31 Johnstone Drive	Single storey dwelling at end of built development on Johnston Drive, western side.	Difficult to ascertain whether property is fenced on side boundary, but even so it is likely to have views over much of the proposal including streetlights.	Moderate



48 Johnstone Drive	Single storey dwelling on the northeast corner of Johnstone Drive and Ron Place.	Some oblique views towards the proposal, although these are restricted by boundary fences and vegetation.	Low
3 Ron Place	Single storey dwelling at end of Ron Place, northern side.	Some oblique views towards the proposal although these are restricted by boundary fences, the neighbouring dwelling and new plantings around the school.	Very-Low
3 Woodgate Court	Single storey dwelling on northern side of Woodgate Court	Some oblique views towards the proposal down the gully, but restricted by rear section dwellings on Abby Road.	Low
5 Woodgate Court	Rear section, single storey dwelling on northern side of Woodgate Court	Located at head of the gully system, and potential for views towards proposal, although it is difficult to ascertain to what degree boundary and garden vegetation provides screening. Located some distance from the proposal, more likely to be affected by construction movement and night lights.	Moderate-Low
9 Woodgate Court	Single storey dwelling on northern side of Woodgate Court.	Property is largely screened from the proposal by neighbouring dwellings.	Very-Low
11 Woodgate Court	Single storey dwelling, with dormer attic, on northern side of Woodgate Court.	Orientated on an oblique angle to the gully, with views partially screened by neighbouring property and potentially vegetation. However, some views possible from dormer windows. Located some distance from the proposal.	Moderate-Low
17 Woodgate Court	Single storey dwelling near to turning circle on northern side of Woodgate Court.	May have some oblique views down gully towards proposal, but appear to be heavily restricted by vegetation on neighbouring property.	Low
19 Woodgate Court	Single storey dwelling off turning circle, northeastern end of Woodgate Court.	Appears to have relatively open views down gully towards proposal. Although some distance away is likely to see most of the construction works and completed road. Night lighting likely to be visible.	Moderate

My assessment identifies that four properties are likely to experience a *moderate* level of visual effects, and five properties a *moderate-low* level of visual effects.

I also considered potential visual effects on the recently completed Westmount School located directly opposite the proposed intersection on Johnstone Drive. Views from the school are generally orientated to the north and east, and it appears that the road boundary has been planted with trees. Therefore, whilst there will be views from some locations, it is considered that visual amenity effects on the school will be *low*.

I agree with the Hudson Report that the proposal will introduce new traffic movements in the area, however this is an activity that already occurs.

Further, I agree with the Hudson Report that there are likely to be some positive outcomes in terms of the appreciation of the gully (and Manga o Tane) reserve through the creation of the crossing. However, the visual coherence of the gully system will be interrupted by the road, resulting in adverse visual effects.

Overall, I consider that the visual effects of the proposal will be generally *low*, however there will be some immediately adjacent properties whereby visual effects will be as high as *moderate*. In this regard, I concur with the Hudson Report in regard to the overall visual effects rating of *moderate*.

Review of Submissions

A total of four submissions were received following notification of the NoR. I address these below:

- **Bo Yu**, 19 Woogate Court, raises a concern about land severance that will result from the new proposal. This is a matter I considered in detail on the first application. However, the revised proposal has resulted in the Designation boundary being directly aligned with Manga o Tane reserve, and



proposes vegetation of a similar type and character used in the reserve. As a result, the road will effectively extend the reserve right to the road boundary, leaving only undeveloped land at the head of the gully. The Proposed Draft Aokautere Structure Plan (Figure 5 of the Transportation Assessment contained in the NoR) indicates that potentially four new residential sections will be provided for through the construction of the link, giving some purpose to parts of the gully (noting that it is understood steeper parts of the gully are not geotechnically stable enough for development). Therefore, it is not difficult to imagine that, in time, the undeveloped land (extending right up to Woodgate Court) will be vegetated in a similar manner to the reserve (either by Council or a neighbourhood group) – providing beneficial landscape outcomes. Therefore, the worst case scenario is that this potentially severed land remains undeveloped and unmanaged, but the more likely long-term outcome is that it will be improved. On this basis, I consider the severance issue is no longer a landscape effect to be concerned about.

- **Powerco** raises no landscape, natural character or visual amenity concerns.
- **Aokautere Land Holdings Ltd** raises no specific landscape, natural character or visual amenity concerns. Reference is made to a historical resource consent application by the submitter that involved, in part, the filling in of the upper portion of the Abby Road Gully. Discussion of landscape and visual effects of this proposal is included, but no determination or conditions are provided. In my opinion, such reference to a different proposal, at a different time, is of little relevance to the current application and does not alter my conclusions in regard to my review of the Hudson Report.
- **Lynne Bishop** raises concerns in regard to the visual effects of the proposal from her property, located at 11 Woodgate Court. I have provided an assessment of this property in the table above and conclude that visual effects on this property will be moderate-low. There are no plans within the NoR for filling in the upper portion of the gully, and therefore it is beyond the scope of my review to consider the visual effects of any such outcome. However, I note that planting is included on the earthworked slopes between the road itself and Ms Bishop's property, which will provide some degree of mitigation.

Recommendations & Mitigation

The Hudson Report provides the following recommendations:

- Ensure the land area between the proposed road and the Manga o Tane Reserve is revegetated to match the native species within the Reserve
- Plant all road embankments within the designation
- Ensure pedestrian access is provided for along the road to add further amenity value and connectivity.
- Facilitates the opportunity for a walkway connection to be created through to Manga o Tane Reserve.

I concur with the first recommendation and consider this would be an appropriate way in which to reduce and mitigate the potential landscape and natural character effects associated with crossing the gully. Planting the road embankment on the lower side would allow for increased control over the sequence of vegetation between the proposal and the reserve and would help to disguise and integrate the landform modifications associated with the road. This would effectively speed up the natural regeneration process, with the road providing a more rational endpoint to the gully system than a non-defined legal boundary. In turn, this would further enhance the visual amenity experienced by future users of the road.



Planting the road embankment on the upper side of the gully provide some level of mitigation of visual effects, lessening the dominance of the road infrastructure and enhancing the connection to the reserve for viewers uphill of the proposal. It will also provide a start to enhancement of the natural qualities of the upper gully. Additionally, for the project itself planting has the potential reduce longer-term maintenance costs (compared to regular mowing).

I note that no planting plan has been provided with the application. I would anticipate a preliminary planting plan, including area to be planted, species mix and overall plant quantities, be provided as part of the Outline Plan. In addition, an indication of how such planting will be maintained will be important.

In regard to the third recommendation, I understand that the road proposal will provide pedestrian access on both sides. I agree that this also facilitates the opportunity for a walkway connection into the reserve (the fourth point), although I recognise this is currently beyond the scope of the NoR as lodged. There is no particular effect identified that such a walkway would mitigate, and no assessment of such a walkway within the Reserve has been provided.

Although the proposal has identified night lighting will be included, there are no specific details on how this lighting will be established. To diminish light-spill effects at night, I recommend that directional LED lighting be used. Such lighting is becoming relatively standard in road construction and operation and is remarkably effective at containing light within the road environment only.

In terms of the proposed design options, I am in agreement with the Hudson Report that Option 1 will provide better landscape outcomes than Option 2.

Conclusions and Recommended Conditions

I have undertaken a review of the assessment of landscape, natural character and visual amenity effects provided as part of the NoR application for the extension of Abby Road, Palmerston North. I note the changes that have been made to the proposal since the first application, in particular extending the designation boundary to Manga o Tane Reserve and planting this area with a species mix that reflects the habitat in this reserve will provide appropriate mitigation.

Generally, I concur with the findings of the assessment that the landscape, natural character and visual amenity effects (from some properties), without planting, will be *moderate*, this translating to *more than minor*. However, the inclusion of planting as recommended in the Hudson Report (and the previous section) will provide appropriate mitigation that helps to integrate the proposal with the reserve, and also positively sets up ongoing revegetation of the upper gully (noting that undertaking the planting of this gully is outside of the scope of the project). With this planting mitigation, I consider that the landscape and natural character effects of the proposal will reduce to *low*. Visual effects will still be experienced by some close-neighbouring properties.

Turning to conditions, I consider that the following are appropriate in regard to landscape, natural character and visual amenity:

- That the Requiring Authority includes within the Outline Plan of Works a Planting Plan which illustrates the areas of the designation that are to be planted, the species mix to be used, and the overall quantities/density of planting. This planting is to be designed to replicate and enhance the native planting found in the adjacent Manga o Tane Reserve.
- That the Requiring Authority includes within the Outline Plan of Works a Landscape Maintenance Plan that demonstrates how the planting to be undertaken will be maintained in perpetuity.



- That directional LED lamps be used in any streetlights in a way that reduces any light spill beyond the boundary of the Designation.

Ryan, should you require any further information, please do not hesitate to get in contact.

Yours sincerely

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