

**IN THE MATTER** of the Resource Management Act 1991 ('the Act')

**AND**  
**IN THE MATTER** of an application for resource consent to construct and operate a  
campground at Davie Street, Hokitika

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**EVIDENCE OF ANDREW WILLIAM CRAIG  
ON BEHALF OF TUFFY INVESTMENTS LIMITED**

**LANDSCAPE**

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## INTRODUCTION

- 1 My full name is Andrew William Craig.
- 2 I hold the position of Director of *Andrew Craig Landscape Architecture Limited*. I have been in this position since 2009.
- 3 I have been practising landscape architecture since 1987. For 5 years until mid-2009 I was employed by Peter Rough Landscape Architects Ltd. Before that I was employed by the Christchurch City Council for 13 years, working in the area of environmental policy and planning. Prior to that I worked for a short time with the Department of Conservation. Most of my work since graduation and to date has involved landscape assessment and the development of landscape policy.
- 4 I hold a Bachelors of Arts degree (Canterbury University) and a post graduate diploma in landscape architecture (Lincoln University).
- 5 Of some relevance, when I was a teenager my parents owned and operated a camp ground that had a similar range of activities as that proposed. I therefore have some insight into how campgrounds are operated and the effects of such activity.
- 6 I have been engaged by Tuffy Investments Limited to provide landscape evidence regarding a land use application to establish a camp ground at Davie Street, Hokitika. The location and extent of the application site is shown in the **Graphic Attachment – Figure 1**.
- 7 I understand that the activity status is non-complying on account of the excessive area of the floor area of a non-residential building, and of the proposed sign. Assessment therefore is subject to RMA s104(d) in consideration of whether the effects are more than minor or contrary to the objectives and policies of the District Plan.
- 8 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I have complied with it in preparing

this evidence and I agree to comply with it in presenting evidence at the hearing. The evidence that I give is within my area of expertise except where I state that my evidence is given in reliance on another person's evidence. I have considered all material facts know to me that might alter or detract from the opinions I express in this evidence.

## **SCOPE OF EVIDENCE**

- 9 My evidence addresses the following landscape matters arising from the proposed camp ground.
  - a. A description of the application site and its surroundings (the receiving environment).
  - b. A description of the landscape treatment proposed for the camp ground which is accompanied by a landscape concept plan that I have had prepared – see **Landscape Plan Attachment**.
  - c. An assessment of landscape and visual effects arising from the proposal, and where these are potential adverse, consideration of how they are avoided, remedied and mitigated.
  - d. Consideration of the Westland District Plan landscape and amenity provisions.
  - e. Consideration of the Council's s42A report and any other relevant material presented by the Council.
  - f. Consideration of written submissions.
  - g. Provision of recommended conditions of consent where they affect landscape outcomes.
- 10 In preparing my evidence I have read:
  - a. The application prepared by Coastwide Surveys *Limited*.

- b. The plans, elevations and perspective drawings<sup>1</sup> prepared by Stiles and Hooker Architects and Engineers.
  - c. *The Westland District Plan.*
  - d. *The Council's s42A report*
- 11 I have visited the application site on one occasion – 28 January 2017. I have also viewed the site from various publically accessible vantage points beyond it, including from the air.

## **EXECUTIVE SUMMARY**

- 12 There is nothing of landscape significance on the application site that would impede development as a camp ground.
- 13 No part of the proposal will fail to achieve RMA s7 matters<sup>2</sup> where they concern landscape and amenity.
- 14 Landscape and visual effects arising from the proposal are firstly less than minor, and secondly are not contrary to the Westland District Plan objectives and policies.
- 15 The proposal will readily achieve the landscape character and amenity outcomes anticipated by all of the relevant proposed District Plan objectives and policies.
- 16 In many respects, the proposed camp ground will result in environmental effects that are better than those that would non-fancifully be achieved via implementation of the permitted baseline.

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<sup>1</sup> Dated 23 January 2017

<sup>2</sup> Specifically s7 (c) and (f)

## SITE LANDSCAPE DESCRIPTION

17 In the discussion to follow I consider the landscape character of the application site and the receiving environment. The extent of the latter encompasses that area I consider is potentially affected by the proposal to a significant degree, which I have shown on the **Graphic Attachment Figure 2 Map**.

### **The application site** (the site)

18 Broadly the site can be divided into two parts – that of the proposed campground area and that of the bush remnant between it and Airport Drive. The location and extent of these features is shown on the **Graphic Attachment Figures 1 and 2 aerial** photographs.

19 The salient characteristic of the site is that the proposed campground has been partially developed. As the **Graphic Attachment Figures 3 – 6** photographs show, most of the site apart from the bush area has been almost completely cleared and gravelled over. Apart from one tree, an English Oak, and some grassed areas there are virtually no remnants of pre-existing vegetation or any other features within this developed area.

20 As is evident in the aforementioned photographs, the concrete foundations for all of the buildings have been poured and are now in place. These give a good on ground indication of how the proposed buildings relate to each other, the site boundary and immediate neighbours.

21 The only other significant site feature is the flat-deck type steel boundary fence. This almost encircles the entire site.

22 Ephemeral physical features include gravel stockpiles and concrete pipes.

23 There are no overhead services and nor will there be any.

24 That part of the site devoted to the proposed campground exhibits very little natural character as it has been almost entirely modified as shown in the Graphic Attachment photographs. There is no sign that any significant natural

features occupied the site prior to it being modified. Such features might include stands of bush, wetlands and rock outcrops. I understand from the application and from 'Google – earth' aerial and street view photographs (see **Graphic Attachment Figures 1,2 and 7**) however that the site was heavily vegetated. It appears that much of this was gorse however, and doubtless other plant species. Apart from the aforementioned tree, all of it appears to be scrubby with no indication that many large trees occupied the site.

25 The aerial photographs also indicate that the terrain was undulating criss crossed with a network of appear to be drains. Low earth mounds also appear evident which I suspect are castings from the drain formation – that is, they are not naturally occurring.

26 The aforementioned bush remnant does however, in contrast to the rest of the site, exhibit high natural character. The bush is dense and lush. The lack of mature climax species – rimu, matai, miro, rata and such like – suggests to me that this bush is second generation.

27 This occupies a steep terrace face culminating in Airport Drive and the airport beyond. Consequently the bush and camp ground areas denote or reflect the two dominant or prevalent landforms occurring within the site.

28 Within the partially developed campground area of the site amenity is not particularly high. This is largely due to the almost total absence of vegetation and natural features. For the opposite reasons the remnant bush area however does present high amenity. The only factor that contributes some degree of amenity is open space itself. This will be an important consideration when I come to assess effects arising from the proposal.

### **The receiving environment**

29 By virtue of their greater extent receiving environments tend to be much more diverse in character when compared to application sites. This is the case regarding this particular proposal.

30 Being located in a low density residential area the receiving environment is typically sub-urban in character – see again **Graphic Attachment Figure 7**

aerial photograph. Apart from the bush remnant, the site is surrounded by detached dwellings on what might be described as typical sub-urban lots – ie; <1000m<sup>2</sup>. Most of the dwellings are modest in scale. Many are accompanied by accessory buildings such as garages and garden sheds. Many of these buildings are located to the rear of their respective sections and as a result border the application site.

- 31 Stylistically the buildings are variable reflecting the era in which they were built and the aspirations of owners. Those west of the site appear to be newer than those to the east and south. As a result the buildings contribute considerable diversity to neighbourhood character.
- 32 As can be expected ornamental gardens surround these buildings. Due to the constraints of lot size and site coverage, most vegetation is also modest in scale. Consequently built form is prominent, and this is especially evident as viewed from within the site.
- 33 The only other significant physical features within the receiving environment are infrastructure – namely roads and street lights. Most, but not all overhead services are underground.
- 34 Apart from the bush remnant that occupies the full length of the terrace, there are no significant natural features within the receiving environment. Nor are there any significant heritage features that I am aware of.
- 35 Amenity overall is generally pleasant. This is mostly derived from those qualities of the sub-urban environment that I have described – to reiterate; modestly scale houses in garden settings. The bush occupying the terrace north of site and also contributes significantly to amenity. So overall amenity within the receiving environment is moderately high.

## **THE LANDSCAPE CHARACTER OF THE PROPOSAL**

- 36 Accompanying the application is a site plan<sup>3</sup> that shows the building and roading layout within the proposed campground. Trees are also shown, but

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<sup>3</sup> Prepared by Stiles and Hooker Architects and Engineers dated 15.2.16

their extent and location has since been overridden by the landscape concept plan that I have had prepared.

37 Generally the proposal comprises four distinct enclaves of activity, which are:

- a. The commons which includes bathroom facilities, games room, dining / kitchen, BBQ and TV rooms. Attached to these is the playground. This area is located toward the centre of the site.
- b. The various iterations of cabins strung around part of the site perimeter. All of these face away from neighbouring properties toward the site centre and commons area.
- c. The manager's house, office / shop, and utilities area located near the campground entry.
- d. The tent and camper van sites all of which are located to the north and north western part of the site.

38 Linking these features is an internal loop road. This is confined to the south western half of the site. It is understood however that vehicles will be able to access the tent sites extending up to the northern boundary.

39 As mentioned, there will be no overhead services, which would otherwise significantly diminish amenity.

### **The proposed buildings and their effects**

40 As shown on the site plan a feature of the site is that all of the buildings are located with a bias toward the south west. Northwest is essentially devoid of buildings, being entirely devoted to grassed tent and campervan sites.

41 The avoidance of adverse effects arises from other characteristics of the buildings and their layout. These avoidance measures are:

- a. None are setback closer than 4 metres from the site boundary. I understand that subject to recession plane requirements buildings can as



of right, be as close as 1.5 metres from one side boundary and 3 metres from all other boundaries.

- b. All of the accommodation buildings face inward toward the site centre, thereby maximising privacy for neighbours.
- c. The most active commons area (containing the amenities, dining, entertainment, and playground and so on) is located at the centre of the site as far as possible from neighbours.
- d. All buildings are single storey thereby minimising visual bulk.
- e. The single storey buildings will be in keeping with those of neighbours where the majority of dwellings are also single storeyed.
- f. Regarding the latter point, the avoidance of two storey buildings minimises the ability of campers to overlook neighbours resulting in the maintenance of privacy.
- g. Being architect designed the buildings are aesthetically pleasing.
- h. The buildings are in plan, elevation, material and colour modulated meaning that any potentially long monotonous unbroken facades are avoided and that generally their apparent visual bulk is reduced.
- i. There is varying amounts of separation between buildings which helps to minimise bulk, while enabling the infiltration of open space between them.
- j. In terms of their floor area none of the buildings exceed the size<sup>4</sup> of those typically found in the surrounding residential neighbourhood and so in this regard they are consistent with existing bulk and scale.
- k. Finally, all storage of goods and refuse will be enclosed by built structures. The aim is to screen these activities which would otherwise generate adverse amenity effects.

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<sup>4</sup> The dining / entertainment building is the largest at 285m<sup>2</sup>. The 6 double units are 260m<sup>2</sup> while the manager's residence will be 247m<sup>2</sup>.

42 For the above reasons I conclude that in terms of their scale, bulk and style, the proposed buildings will be entirely in keeping with those of the neighbourhood generally. There is however one difference; the vegetated open space between the campground buildings will be much greater than that of the neighbouring residential area. As a result there will be significantly greater amenity. The character of this open space and how it is to be landscaped I discuss next.

### **The proposed landscaping**

43 A landscape plan has been prepared for the site – see **Landscape Plan Attachment**. The reasons for landscaping are as follows.

44 The first is to make the campground attractive to guests. There are two reasons for doing this. One is to attract guests to the ground in the first place. Potential guests will need to see that the campground is a very pleasant place to stay before making the decision to actually stay. In this regard the campground will need to appear, in amenity terms, seductive or promising. So it is important that the campground conveys park like characteristics which is what the proposed landscaping sets out to do. The second reason is that guests will want to reside in an aesthetically appealing environment. In so doing the pleasantness of their stay is enhanced.

45 The second is that landscaping has been provided in certain areas alongside the perimeter fence to enhance outlook and privacy for neighbours. This planting will be opaque in nature comprising mostly shrubby native plant species as indicated on the landscape plan. In designing this, consideration has been given to ensuring such planting does not unreasonably shade neighbours. With the tree screen the idea is to have some scattered taller trees among the shrub planting, but not so much that unacceptable shading will occur. Otherwise the species selected are generally low growing – in the order of approximately 3 metres. Taller trees will be no closer than 5m from the southern and eastern boundaries.

46 Thirdly, privacy will be assisted by the existing 1.8m high steel clad fence. This fence is opaque thereby screening views below the 1.8m eye level. The effect of this can be seen in the **Graphic Attachment Figure 4** photograph.

- 47 Later I will discuss the matter of privacy in more detail, particularly with regard to the permitted baseline and with respect to some of the neighbours who I am aware have expressed concern in this matter.
- 48 Fourthly, it is important that the campground is physiologically comfortable for guests. The trees and shrubs will aid comfort by providing shelter from the wind and shade from the sun.
- 49 Fifthly, landscaping can enhance safety. Campgrounds involve concentrations of vehicles and associated manoeuvring. The location of trees and shrubs can help in the management of traffic movements. Further, their presence can create the sense of obstacles which has the effect of slowing traffic movement. Finally, the planting is designed in such a way that sight lines are kept open at the sub-canopy level. This so that pedestrians and other vehicles can see each other, thereby maintaining on site safety. This principle will also apply at the entranceway to the campground where vehicle movements are likely to be concentrated.
- 50 The sixth point is that landscaping can help in creating a sense that the campground is a secure environment. In this regard CPTED<sup>5</sup> principles apply. In a campground environment it is important for security reasons to maintain a high level of transparency through the site. This allows guests to ascertain the movements of others while maintaining de facto or passive surveillance of property. This principle applies to all environments including that of the surrounding neighbourhood. To achieve this within the campground trees will be limbed up so as to maintain overall visibility. There will be no artificial opaque barriers such as internal fences or walls. Opaque shrub planting will be kept to a minimum except at certain points around the site perimeter.
- 51 Allied to the provision of security and safety is the need to provide lighting. A lighting plan and brief report has been prepared<sup>6</sup>. I understand from this that light spill to neighbouring properties will not exceed 10 lux. This assumes that there is no intervening vegetation – which there will be. Consequently the light spill is very likely to be less than that indicated in the lighting report.

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<sup>5</sup> Crime Prevention Through Environmental Design

<sup>6</sup> By Micon Engineering dated 9.5.2016 – attached as Appendix H to the application

- 52 The seventh point is that landscaping has been designed to create 'outdoor rooms' or precincts within the campground. The reasons for doing this are threefold.
- 52.1 One is that it helps to demarcate different functions within the camp – the tent sites, powered sites, cabins and commons area.
- 52.2 The second is that it helps provide a sense of territory and community for guests with common interests – again those using tents compared to those residing in cabins or campervans. In this regard a campground might be regarded a miniature society.
- 52.3 Thirdly, the creation of these 'rooms' helps to break up the visual extent of the campground. What this means is that the full extent of the campground would be difficult to appreciate from any one vantage point. The exception might be from elevated vantage points such as for those dwellings located on the terrace overlooking the site in addition to those which are two storeyed.
- 53 The eighth point is that the landscaping is designed to accord with that which occurs in the surrounding residential area and or what might be expected to occur in a suburban setting. Planting will therefore incorporate what might be described as ornamental or garden species such as magnolia, rhododendron along with native species. These are common garden species on the West Coast. Other plant species will be indigenous which are also common in West Coast suburban environments. This planting will also help link the existing remnant bush to the campground. To assist in this regard, the layout of planting will be largely informal.
- 54 Arising from the final point, certain indigenous plant species used will help provide habitat for fauna – particularly birds both native and exotic.
- 55 Overall the landscaping will result in a very high level of amenity for the site which is largely driven by the need to provide a pleasant place for guests. In so doing it will also provide a pleasant outlook for neighbours – one where trees and shrubs will dominate. As a result, buildings and ephemeral accommodation (tents and campervans) will appear subservient to the setting.

This effect will be reinforced by the abundance of open space in proportion to built form.

## **THE AVOIDANCE, MITIGATION AND REMEDIATION OF ADVERSE EFFECTS**

56 The measures to avoid, mitigate and remedy potential adverse effects have been largely traversed in the preceding discussion concerning aspects of the proposal. So in the discussion to follow I summarise these measures for the purpose of clarity. I also want to identify who potentially affected parties are and what exactly are the adverse effects.

### **Whose amenity is potentially affected?**

57 Essentially it is going to be immediate neighbours – that is, those residing alongside the site. This includes some on the terrace whose dwellings are accessed off Airport Drive. Also included to limited extent are those residing alongside Davie Street, which gives access to the proposed camp ground. The location of potentially affected parties within the receiving environment is shown on the **Graphic Attachment Figure 2** aerial photograph.

58 There are no publically accessible vantage points from which the site can be viewed. This includes the elevated Airport Drive as views from here are screened by the existing remnant bush on the site. It will be a condition of consent that this bush is retained, thereby ensuring screening is permanent.

59 There is also a public outlook at the top of the terrace. It is not possible to see the site from here due to intervening dwellings, bush and landform.

60 In summary therefore, effects on amenity are confined to immediate neighbours.

## **The potential adverse effects and their avoidance, mitigation and remediation**

- 61 Under the RM Act assessment must include consideration of *'landscape and visual'* effects.<sup>7</sup> The difference is that landscape effects are those resulting from changes to the landscape irrespective of whether they are visible. Visual effects are those which are visible from any vantage point accessible to the public and private individuals.
- 62 As the site was devoid to buildings prior to its present state of development, the most significant change will arise from those proposed. As described, the extent of these is not great, particularly when compared to what could occur as of right. The proposed buildings will introduce a permanent irrevocable change to the landscape of the site.
- 63 The presence of buildings in the landscape of the site is anticipated by the District Plan. I understand that subject to controlled activity status, the site could potentially be subdivided to the extent that reasonably or non-fancifully somewhere between 20 and 30 lots with dwellings could be established. This takes into account space required for road access. Consequently the landscape effect arising from the proposal will be significantly much less than that from non-fanciful implementation of what is likely to occur should the site be subdivided. Other potential as of right activity could include elderly persons housing or non-residential activity such as a church. I understand that, in part,<sup>8</sup> this in effect constitutes the existing environment.
- 64 I am also aware that it is non-residential building size that triggers non-complying activity status. In this regard the District Plan includes the following discretionary matter<sup>9</sup> which states:

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<sup>7</sup> RMA Fourth Schedule 7(1)(b) *any physical effect on the locality, including any landscape and visual effects and (d) any effect on natural and physical resources having aesthetic, recreational, scientific, historical, spiritual, or cultural, or other special value for present or future generations (my underline)*

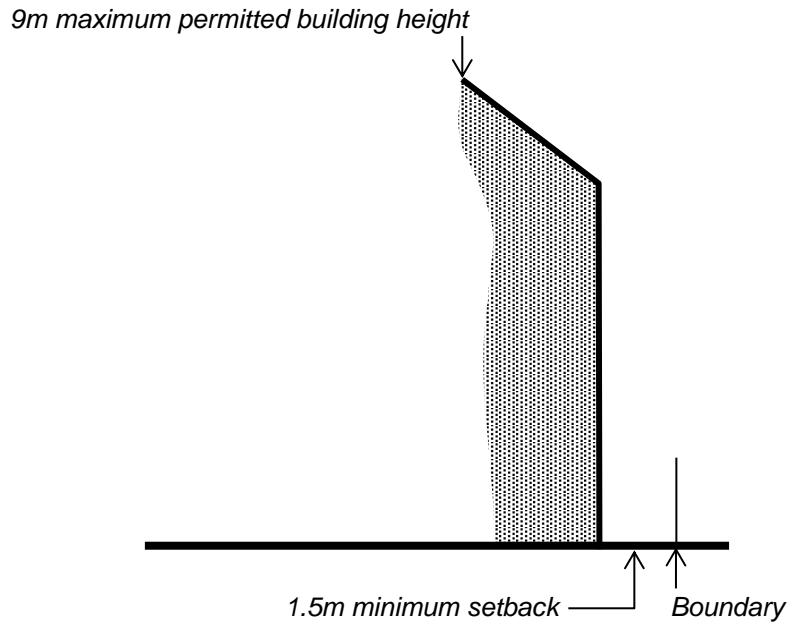
<sup>8</sup> Where the existing environment comprises the environment of the moment; that of consented activity; and what is non-fancifully permitted.

<sup>9</sup> Appendix E

## *Gross Ground Floor Area of Buildings*

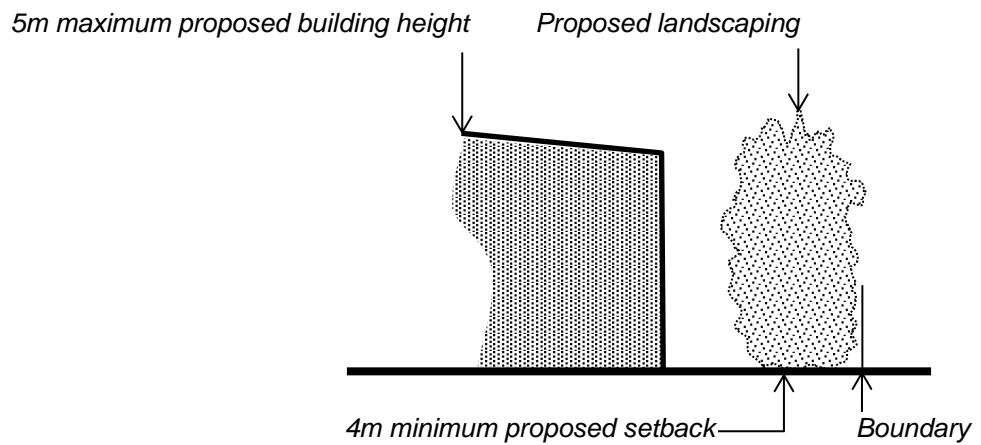
*Applications to increase the size of buildings above that permitted or relocate existing buildings will be considered with regard to the impact of the building on the area. Design, colour, landscaping and screening will be considered and where appropriate, conditions may be imposed to mitigate the impact. The particular activity that the building will be used for will also be considered with regards to its impact - for example a large church may be considered appropriate within a residential area.*

- 65 The discussion to follow will focus on those factors listed in the above cited matter which may assist in the avoidance, mitigation and remediation of potential adverse effects. I also understand that the relevant objectives and policies also need consideration. These factors and the effects they seek to manage will be further considered against what might non-fancifully occur subject to the permitted baseline.
- 66 A key landscape and amenity consideration regarding the non-compliance and buildings in general is their bulk and location. The permitted baseline enables buildings up to 9 metres high – potentially 3 storied. Those proposed will not exceed 5 metres – essentially single storey and close to half the height of that permitted.
- 67 Also concerning bulk and location are boundary setbacks. As discussed earlier, the rule allows for 1.5m on one boundary and 3m from others. The proposed buildings are no closer than 4m. Further, they fall well within the recession plane. I understand that there is no permitted baseline requirement for landscaping within the setback. As the landscape plan shows, all proposed buildings will have landscaping between them and the boundary. Consequently their views will largely comprise vegetation. Screening of the camp will also be mediated by the presence of the opaque iron fence whose screening effect will be compounded by the presence of vegetation.
- 68 I illustrate the bulk and location differences **Diagram 1** to follow. The effect of planting within the setback is also shown.



**Above:** *Building bulk and location permitted baseline*

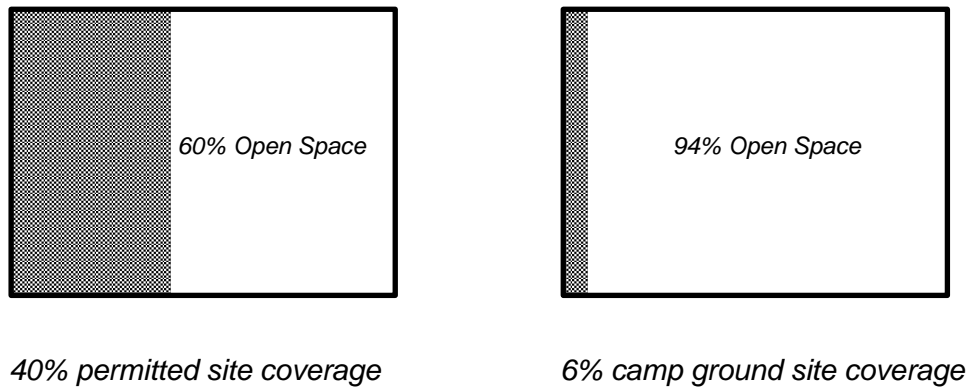
**Below:** *Building bulk and location proposed*



**Diagram 1** *Illustrating in cross section the generic difference between permitted bulk and location and that proposed. The diagram does not take into account the recession plane as this will vary depending on the boundary and buildings in relation to neighbouring residents.*



69 The only other significant change will arise from the proposed landscaping. As described this will be extensive and will in fact be the dominant feature of the site along with abundant open space. Regarding the latter, site coverage will not exceed 6%. Permitted site coverage is 40%. Visually I have shown the difference of this in **Diagram 2** below.



**Diagram 2** Showing the difference between permitted site coverage and that proposed.

70 As a result, it is my opinion that the landscape effects arising from the presence of the proposed buildings, while enduring, will be very much less than that emerging from a non-fanciful permitted baseline scenario. Clearly the proposed building bulk and location will result in far less landscape effects or changes compared to that generated by implementation of the permitted baseline.

71 Further, the effects of buildings, such as they are, will be countered by the presence of extensive landscaping, which is not otherwise required by the District Plan. I do accept however that under a residential scenario, people will landscape and create gardens. As is currently evident, not all of this occurs within the setback however – see again **Graphic Attachment Figure 4** photograph. With the proposal planting within the setback will be required as a condition of consent. This in itself will constitute a landscape effect which can only be positive or remedial from the point of view of neighbours.

72 Less irrevocable but nevertheless enduring will be the presence of paved roads and allied infrastructure – namely lamp standards. The same applies to the playground equipment and signage. Putting aside the signage for now, the presence of lamp standards and roads are a common feature in suburban environments. So while their existence results in a landscape change, it is not unexpected in such a setting.

### *Signage*

73 The same applies to signs to a certain extent. One main sign is proposed which is to be located at the camp ground entry at the terminus of Davie Street. Other much smaller directional and identification signs will be located within the camp ground. Being very modest in size the latter will not be visible beyond the camp ground boundary.

74 The proposed entry sign will be 3m wide by 1m high mounted 0.4m above ground level. Total height will be 1.4m above ground level. The area of the sign will therefore be 3m<sup>2</sup> – 2m<sup>2</sup> larger than what is permitted. Dictating this size is the need for text to be readable from Park Street, some 70m distant.

75 The District Plan entertains the existence of signs in suburban environments on the proviso that they are modest in size and are therefore not dominant. To that end, the maximum permitted sign size in residential zones is 1m<sup>2</sup> per site. Between 1m<sup>2</sup> and 2m<sup>2</sup> signs within the Residential Mixed Zone attract discretionary activity status and are therefore subject to the Appendix E discretionary matters also.

76 Most of these matters are concerned with traffic safety, but some flag visual amenity issues. Within my field of expertise I can only consider those concerning amenity issues. These state:

### *Signs*

*Impact on Visual Amenity. When assessing an application, the Council will specifically consider actual or potential effects on the site and its environs including whether the sign will obscure or detract from a particularly significant building, view or landscape feature. In rural*

*areas, signs should not project above the visual horizon when viewed by passing motorists. In all areas, the proposed materials and colours should be sympathetic to the location.*

*The number of other signs currently present in the locality or area and whether approving the sign will result in a cumulative effect on either traffic safety or amenity values.*

- 77 Regarding the first matter, no significant buildings, or any building for that matter, will be obscured or detracted by the sign. Nor will it obscure any significant landscape feature or view.
- 78 The materials and colours of the sign will be as shown on **Graphic Attachment Figure 8** image. From this it is evident the sign will have a dark green background with the name of the camp ground and an arrow indicating the entrance. A logo for 'Kiwī Holiday Parks' who I understand will run the camp ground will also be included. The dark green background will blend in with the signs' vegetative backdrop so that in effect the only salient visual effect will arise from the content – the lettering and logo essentially.
- 79 Concerning cumulative effects, there are no other signs in the vicinity of that proposed. Therefore no cumulative effect will occur.
- 80 The above matters more or less align with the relevant policies concerning signs. Those of relating to Part 4 amenity outcomes state:
- F. *To ensure that signs are appropriate to the character of the area and do not detract from the amenity values of that environment.*
- G. *To avoid a proliferation of signs which have the potential to result in cumulative adverse effects on amenity values.*
- 81 In my opinion the proposed sign will not be contrary to the above two policies. As indicated there are no other signs in the area and so visual clutter is

avoided as are any consequent cumulative effects. And the proposed sign in terms of its visual bulk and height is not what I considered particularly dominant or obtrusive.

## **DISTRICT PLAN OBJECTIVES AND POLICIES**

82 There are a number of policies that are relevant to amenity outcomes arising from the proposal. The District Plan also incorporates landscape objectives and policies, but these are more or less entirely devoted to the natural landscape. Those relevant to the proposal are discussed as follows.

83 *Part 4.4 Amenity* policy states:

*A. The effects of activities which can have significant adverse effects on amenities and the well being of residents shall generally be avoided, remedied or mitigated.*

*E. The effects of activities which can be seen as adversely affecting the overall environmental amenity of the District shall be avoided.*

84 As discussed so far, the conclusion I reach is that any potential adverse effects on landscape and amenity will be avoided, remedied and or mitigated. Additionally my opinion is that these effects will be significantly less than minor. Amenity will be very high; indeed quite a bit higher than that delivered by reasonable implementation of the permitted baseline. Consequently it is my opinion that the proposal will not be contrary to these two policies.

85 *Part 4.2 Settlement Character* policy states:

*A. A range of activities should be able to locate in the urban areas provided that any adverse effects on the environment or neighbouring land uses are avoided, remedied or mitigated.*

86 The conclusions reached in the preceding paragraph apply equally to this particular policy. Importantly however, the policy flags the prospect of varied

activities establishing in urban areas, the implication being that this applies to any one particular zone and not just the urban area per se. This policy appears to align with Part 3.9.2 Policy which states:

*3.9.2 To provide for the “intermingling” of land use activities within Westland’s settlements and towns, where this does not detrimentally impact on the amenities, health and safety of residents and workers*

87 Regarding landscape character, this would seem to indicate that the urban environment will be characterised and informed by some diversity, provided it is compatible with the activity in the surrounding, in this case mixed residential, zone. The proposed camp ground would be consistent with such an outcome. Compared to many other less residential friendly business enterprises, a camp ground is far more compatible in both character and amenity.

88 The final landscape relevant objective is *Part 3.9 The Built Resource* which states:

*3.9.1 To identify, protect and enhance the distinctive Westland character of the District’s settlements.*

89 In terms of its scale, design, style, layout and extent the proposed camp ground is not what I would consider incongruous within the context of its wider urban setting – namely Hokitika. It certainly will not in any way possible undermine the overall urban character and amenity that characterises Hokitika. Nor would it be at odds with peoples’ expectations given that camp grounds are a relatively common activity in both urban and rural settings. This expectation is further informed by Hokitika’s reputation as a holiday and visitor destination where tourist activity is highly apparent. So in this regard I do not think that the proposed campground would be contrary to this particular objective.

90 In summary, it is evident that the objectives and policies concerning landscape outcomes anticipate diversity within suburban environments provided any adverse effects are avoided, remedied or mitigated. This would suggest that urban environment character will be quite varied where it may

entertain a range of activities. It is by no means a homogenous environment solely devoted to one activity – in this case residential. Nonetheless, on the spectrum of activity a camp ground is essentially a residential activity, albeit one where the presence of residents is ephemeral.

- 91 So with regard to these objectives and policies one question remains. Are the potential adverse effects adequately avoided, remedied and mitigated? Certainly with regard to landscape outcomes it is my opinion that they are. Indeed the amenity outcome is significantly better than what may occur as of right.

## **SUBMISSIONS**

- 92 From the s42A report I understand 25 submitters combined to lodge a single written submission. Matters concerning landscape and amenity are:

- a. Amenity will be adversely affected
- b. Visual dominance – especially in the vicinity of the Davie Street entrance
- c. Signage being out of keeping with the neighbourhood
- d. Buildings are not sufficiently setback from boundaries
- e. Loss of privacy
- f. Absence of a landscape plan showing the location and extent of proposed planting

- 93 Most of the above matters are addressed in my evidence so far. The exception is privacy. I also understand that a landscape plan was not submitted at the time of lodgement. One has now been prepared which accompanies my evidence. As described I am confident it will address many of the character and amenity concerns raised by submitters, and indeed the Council's planner.

- 94 The proposed planting shown on the landscape plan has also been designed to enhance privacy between campground guests and neighbouring residents. This is notwithstanding the fact that privacy is determined by the District Plan's bulk and location standards – particularly those determining setbacks, building density and building height. The plan does not appear to provide for privacy beyond these standards – for example by requiring the landscaping of setbacks or ensuring windows do not directly face each other.<sup>10</sup>
- 95 Further regarding privacy, I note that the Council's planner cites case law which distinguishes between neighbours who may know each other and strangers such as tourists<sup>11</sup>. I have difficulty in accepting that view as it does not take into account the presence of strangers who, for example, use the street, parks, schools, churches or recreational areas located within residential areas.
- 96 The Council's planner also identifies certain neighbouring residences whose privacy and outlook will be adversely affected to more than a minor degree. I will discuss these in more detail in my response to the s42A report.

#### **COUNCIL'S s42A REPORT<sup>12</sup>**

- 97 In the discussion to follow I will focus on matters raised which are of concern to the Council's planner – Ms Jessica Hollis - regarding landscape character and amenity. Since the s42A report was prepared additional information is now provided in response to some of these concerns.
- 98 Chief among them is the provision of a landscape plan for the site. In my reading of the report it is apparent that a suitable landscape plan may be sufficient to address the amenity concerns, particularly with regard to outlook and privacy for neighbours. Earlier I described what the landscaping aims to achieve. Without reiterating these, (see my paragraphs 43 – 58), I am confident that the concerns raised by the Council's planner will be satisfactorily addressed.

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<sup>10</sup> Note that window placement is subject to standards in the Christchurch District Plan

<sup>11</sup> s42A report – paragraph 7.48

<sup>12</sup> Report prepared by Ms Jessica Hollis

- 99 In particular Ms Hollis seeks to mitigate what she identifies as potential adverse effects on outlook from particular neighbours. These are the ones whose properties have elevated views (either 2 storey or elevated terrain) over the site, namely at 9 Heenan Place, 171 Jollie Street and 4 Airport Drive. Regarding these particular residences the concern is that they could potentially see the site in its entirety. The solution as suggested by Ms Hollis is to '*...soften or 'break up' the site development.*'<sup>13</sup> She goes on to suggest that this could be achieved '*...via the incorporation of additional formalised landscaping and planting areas, to mitigate the adverse visual effects of the site development on the aforementioned properties.*'<sup>14</sup>
- 100 As described, one of the principle features of the landscape plan is to 'break up' the site by creating distinct enclaves of activity. The variation in tree and shrub species will also assist in this regard.
- 101 Additional mitigation via vegetative screening will be achieved from elevated vantage points resulting from the visual intervention of tree canopies. This is because the tree canopies will be either level with the second storey on dwellings or they will look down on top of the canopy. I accept however, that the canopies will not entirely screen the site in its entirety, but they certainly will soften and screen to a significant degree.
- 102 I also accept that it will take some years for landscaping to fully achieve its purpose. This is because planting will take some time to mature. To help accelerate desired effects, the species selected are generally fast growing. Additionally, some selected specimen trees will be reasonably high at the time of planting, thereby achieving a reasonably immediate effect. Generally though, I would not expect planting to achieve an appreciable effect until at least three to four years following implementation of the landscape plan. In my experience this is common to all proposals involving landscaping, which as time passes continually improves with maturity.
- 103 Ms Hollis also expresses concern regarding the proposed 3m<sup>2</sup> sign at the Davie Street entrance. As discussed, while larger than permitted, the **Graphic Attachment Figure 9** photo-montage indicates that the sign will not

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<sup>13</sup> S42A report paragraph 7.35

<sup>14</sup> Op cit. Also see paragraphs 7.78 and 8.5



appear dominant. Indeed, with its backdrop of vegetation in combination with the dark natural colours of the sign's ground, its structure will appear quite subdued. The only aspect of the sign to stand out, as is necessary, will be the lettering. Consequently I regard the adverse visual effects of the proposed sign will be less than minor.

104 Finally, of particular concern to Ms Hollis is what she considers are adverse effects arising from the scale of the proposal. As mentioned, some reliance is placed on the proposed landscaping to counteract the effects of scale. But even in the absence of landscaping, there are aspects of the proposal that diminish excess scale.<sup>15</sup>

105 In this regard a salient characteristic of the site is that it is divided into various activity areas. Allied to this is the clustering of buildings reflecting these activities. The same applies to the extent and distribution of open space, which, as discussed, is extensive. So in terms of its form the proposed camp ground is varied in its form. As a result its character is heterogeneous. Or to put it another way, the camp ground will not appear monotonously homogenous throughout its extent. This is especially important regarding buildings as they can be potentially domineering. Given the modest size of buildings and their very low site coverage, domination will simply not occur. In fact if any one aspect of the camp ground dominates, it will be open space. And with the landscaping in place so too will vegetation. So while the extent of this is greater than what exists in the immediate neighbourhood, notwithstanding the presence of nearby reserves, I would not regard this aspect of scale as being adverse in any way at all. If anything, the effects including those arising from the proposed landscaping will be positive.

## **RECOMMENDED CONDITIONS OF CONSENT**

106 As any potential adverse effects on landscape and amenity are largely avoided through good design, my recommended conditions of consent seek to ensure this is implemented and maintained. They are:

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<sup>15</sup> Scale is the proportion that occurs between one feature and another.

- 1 That the landscape plan prepared by Whenua Studio dated 03.02.17 be implemented in the first planting season (May to August inclusive) following completion of buildings.

*Reason:* to ensure amenity is achieved as early as possible following construction

- 2 That all planting is maintained and any that dies, or is diseased or otherwise destroyed is immediately replaced by the same species.

*Reason:* to ensure vegetative amenity is enduring

- 3 That the entry sign is located as shown on the Site Plan prepared by Stiles and Hooker Architects & Engineers Ltd; and
  - that its dimensions do not exceed 3m x 1m; and
  - that its total height does not exceed 1.4m above finished ground level; and
  - that its content is more or less that shown on the document labelled "Sign Elevation" prepared by Andrew Craig Landscape Architecture Ltd, dated 13 February 2017.

*Reason:* to ensure the sign does not dominate its setting.

- 4 That in relation to neighbours south of the site fronting Jollie Street, vegetation will be maintained at no more than 3 metres high to within 5 metres of the site boundary.

*Reason:* To ensure these neighbours are not unduly shaded.

## **CONCLUSION**

- 107 Regarding landscape and visual effects for any proposal, context is always the ultimate consideration. Inevitably it rests on the nature of the existing environment including what is non-fancifully anticipated by the District Plan

and any other relevant statutory documents. On that basis, the landscape and visual effects of a proposal will derive from the extent they deviate from what constitutes the existing environment in its broadest sense.

- 108 Also informing effects are what in landscape terms are referred to as 'associative effects'. These centre on the question of; would people expect the proposal to occur in the environment of its setting? As mentioned, camp grounds are common activities in urban settings, just as they are in the rural. Generically therefore, the location of the proposed camp ground would not be out of keeping with peoples' expectations. Or to put it another way, people would not be surprised to appreciate the presence of a camp ground in a urban residential environment.
- 109 Within the context of this particular setting, the proposed camp ground is in my opinion fully compatible. The activity is fundamentally residential; its presence will not result in any obnoxious effects such as that arising from dust or odours; the treed open space amenity is entirely agreeable as is the scale of the architect designed buildings. Regarding the latter, it is my opinion that the outcome is significantly better than that delivered by non-fanciful implementation of the permitted baseline.
- 110 Including the proposed landscaping, it is also my opinion that there will be no adverse effects on amenity, or at least none beyond what can be reasonably expected to occur in a mixed residential setting such as this. Certainly from the point of view of neighbours their view is going to be dominated by vegetation and abundant open space – both key contributors to amenity in any environment.
- 111 The issue of privacy and outlook, particularly from elevated dwellings and living areas will be satisfactorily addressed by the proposed landscaping. This is in addition to other contributing factors such as seasonal use, particularly by campers, generous setbacks and the opaque fence. The matter of privacy also has to be considered within the context of what might reasonably occur within the permitted baseline. Implementation of this may also deliver two to three storey dwellings resulting in unmitigated views into neighbouring properties.

- 112 Possibly the only potentially incongruous feature is the proposed sign. To reiterate, its effects are mitigated by its relatively low 1.4m height above ground level, its dark green colour which will blend in with its vegetative background and simple uncluttered content.
- 113 Finally, it is evident that the landscape and visual effects arising from the proposal will not be contrary to the relevant objectives and policies. It is clear that these entertain a range of activity within the sub-urban environment provided any adverse effects are avoided, remedied or mitigated. In my opinion I am confident these effects, such as they are, will be more than adequately avoided, remedied and mitigated.
- 114 Overall, it is my opinion that the adverse effects on landscape character and amenity will be very insignificant – in fact I consider them trivial.
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**Andrew Craig** *Landscape Architect*

A handwritten signature in blue ink, appearing to read 'Andrew Craig', is centered below the typed name.

10 February 2017