## Appendix 2. Photos that are referred to in this report.

Photo 1: Exotic pasture looking northeast.

Photo 2: Kāmahi dominated regenerating forest canopy.

Photo 3: Southern rātā (left) joining kāmahi in the regenerating forest canopy.

Photo 4: Regenerating native forest with emergent rimu.

Photo 5: Regenerating kāmahi forest with sparse understorey and forest floor layers.

Photo 6: Dense stand of young rimu with the rounded canopy of a southern rātā clearly visible just left of centre.

Photo 7: The single red beech tree seen on the site.

Photo 8: Deer browsed kiekie.

Photo 9: Deer browsed kāmahi.

Photo 10: Deer antler rubbing on a horoeka stem.

Photo 11: View of part of the main waterbody.

Photo 12: Remains of dead woody vegetation submerged in the main waterbody.

***Photos on the following pages.***

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8
Photo 9

Photo 10

Photo 11

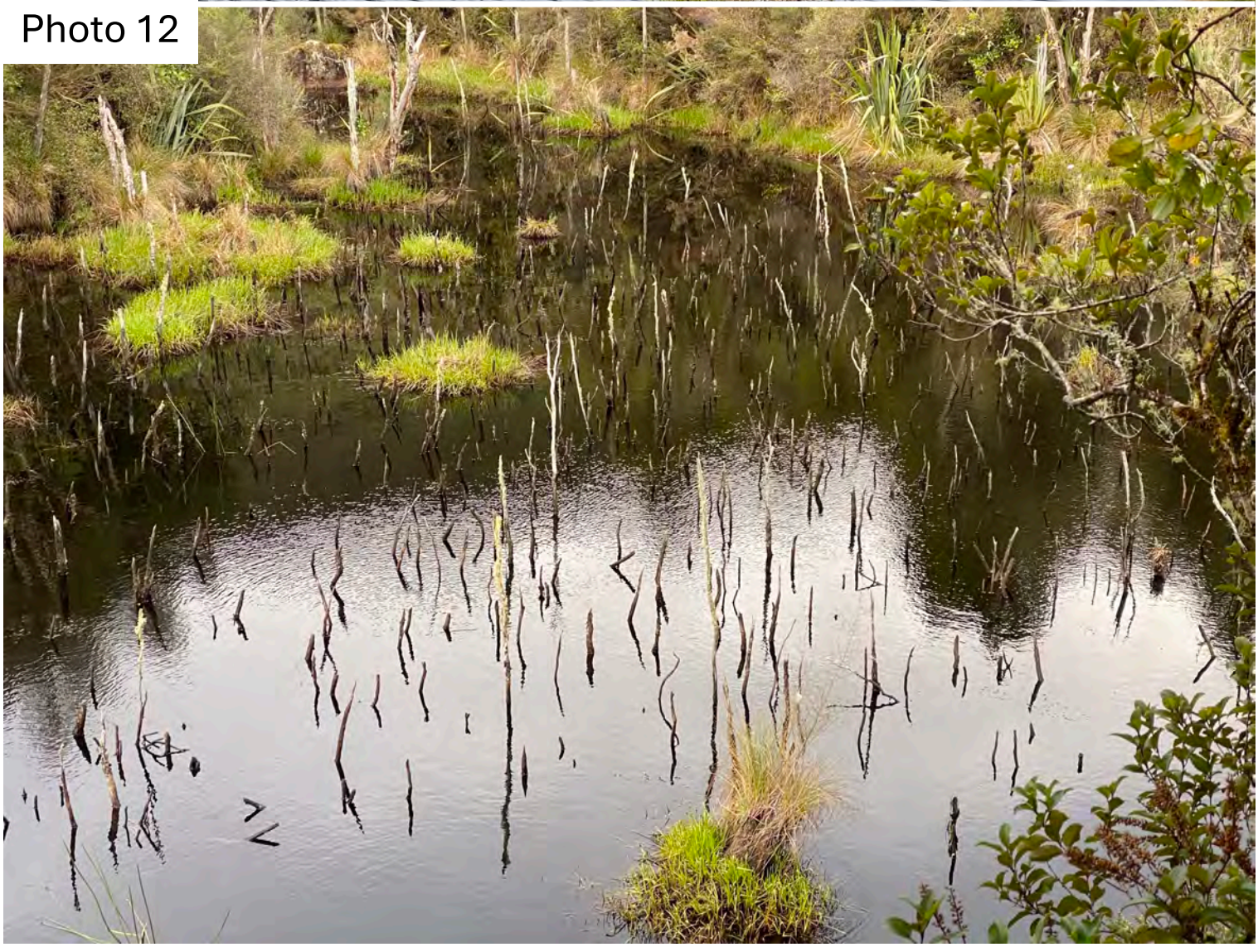

Photo 12

LANDSCAPE ARCHITECTS
tasmancarter
LIMITED

# Assessment of landscape and visual effects of subdivision, State Highway 6, Addisons Flat, Westport

30 July 2025

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For: J. R. McLaughlin
Version: Final

REGISTERED LANDSCAPE ARCHITECT

# Executive Summary

## The Proposal

The proposal is an 18-lot rural-residential subdivision of Lot 3 DP 360520, located on the eastern edge of Addisons Flat, Westport. The development includes:

- 15 rural-residential lots (Lots 1–15) intended for future dwellings.
- An internal road (Lot 18) following existing site tracks.
- No development proposed on Lots 16, 17, or existing titles DP 360520 Lots 4 and 5.
- A consent notice limiting each lot to one main and one minor residential dwelling.

## The Issues

Key issues identified include:

- The geotechnical Building Location Areas (BLAs) do not consider landscape or visual effects.
- The visual impact of future residential development, particularly where landforms and vegetation do not adequately screen new buildings.
- Potential reduction in rural character and amenity, and inconsistency with Te Tai o Poutini Plan (PTTPP) objectives.
- Visibility of development from SH6, Wilsons Lead Road, and neighbouring properties.

## Controls Recommended to Address the Issues

A comprehensive set of controls is proposed to mitigate effects and maintain landscape integrity:

**Landscape BLAs**:

- Designated areas within lots for future buildings based on landscape sensitivity.

**Building Controls**:

- Maximum building heights (generally 5.5m–6.5m).
- Setbacks from roads and sensitive viewpoints.
- Use of recessive cladding and roof colours.
- Directional/hooded exterior lighting.

**Vegetation Management**:

- Retention and protection of existing vegetation (areas “a” – “e” & “g”).
- Control over future clearance of native vegetation.

**New Planting**:

- Approximately 9,500 m² of new planting across 15 specific areas (“i” to “xv”), with priority on mounding to accelerate establishment.

- Landscape Management Plan required for implementation and maintenance (minimum 5 years).

**Fencing**:

Restriction to rural-style fencing to preserve character.

### The Results

The expected visual and landscape effects from three key viewpoints were assessed:

| Area | Location | Initial effect | After three years |
|---|---|---|---|
| 1 | North Site (Lots 1-6, 13-15) | Low-Moderate | Low |
| 2 | South Site (Lots 7 – 12) | Moderate (lower end) | Low |
| 3 | View from neighbour (Lot 2) | Moderate (higher end) | Low |

These effects are expected to diminish within approximately 3 years, primarily due to the establishment of new planting and buffering from existing vegetation.

### Overall Outcome for the Landscape and People in Areas 1, 2 & 3

If the recommended controls are implemented:

- The subdivision will blend into the surrounding landscape, particularly east of SH6, where existing native bush and landforms support visual absorption.
- Rural character and amenity values will be retained and enhanced through careful design and restoration planting.
- Views from neighbouring properties and roads will be buffered, maintaining privacy and rural outlook.
- The area's identity, including natural character and historic connections to goldmining, will be reinforced, supporting positive outcomes for both landscape values and local people.

**Conclusion**

With mitigation in place, the subdivision aligns with PTTPP objectives and policies. It achieves a balance between enabling rural-residential living and protecting the character, amenity, and intrinsic values of the Addisons Flat landscape.

## Introduction

This report addresses Council's RFI[1] which notes:

> "*The application notes that the subdivision will change the landscape from rural to rural-residential. It also states that the adverse effects of this change will be "more than minor" but claims they will be mitigated by the Te Tai o Poutini Plan. However, it is unclear what specific aspects of the PTTPP—still under deliberation—would address these potential landscape and visual effects*."

To clarify this, Council seeks

> "*a landscape and visual assessment of the proposal, prepared by a qualified and experienced professional. This assessment should follow the Te Tangi a te Manu – Aotearoa New Zealand Landscape Assessment Guidelines and should specifically address how setbacks and other restrictions could avoid, remedy, or mitigate the visual and landscape impacts of future development on the proposed lots."*

## Method

The assessment[2] was undertaken as follows:

i. Review relevant provisions in the Te Tai o Poutini Plan[3] (**"PTTPP"**). Policy in the PTTPP provides context for the potential effects of the proposal.[4]

ii. Desk top analysis of photos, contours, vegetation, existing landscape features related to Lot 3 DP 360520 (**"Site"**) and the surrounding area. The assessment incorporates the ecologist's conclusions[5].

iii. Site visit on the 10th June 2025 to ground truth the analysis, investigate the issues and scope the nature and level of landscape and visual effects.

iv. Review the subdivision proposal to identify issues: mitigation, including setbacks and/or necessary restrictions for built development to avoid, remedy or mitigate the landscape and visual effects of built development on the proposed lots.

## Scope

The assessment scope is potential landscape and visual effects, amenity, landscape naturalness and rural character, including how setbacks and other restrictions could avoid,

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[1] 21 February 2025
[2] Undertaken in accordance with the New Zealand Landscape Assessment Guidelines 2022. (**"NZLAG")**
[3] The PTTPP identifies outstanding natural landscapes and features, the extent of the Coastal Environment Area whereas the Buller District Plan does not.
[4] The purpose of reviewing the relevant provisions not to undertake a planning assessment. Assessment of the proposal against the relevant provisions is undertaken by the planner (NZLAG p.136 & 139).
[5] 28 May 2025. Dr. D. Norton. McLaughlin Subdivision Ecology Report.

remedy, or mitigate the landscape impacts of future development on the proposed lots. Future building on proposed Lot 17, Te Ao Māori and the agricultural productivity of land are not in scope.

## Assessment issues

***Building Location Areas: Geotechnical and Landscape Response***

The Building Location Areas (BLAs) identified in the geotechnical report are intended solely to confirm that each proposed allotment contains at least one suitable building site from a geotechnical stability perspective. These "Geotechnical BLAs," shown on Figure 1 of the geotechnical report, do not indicate preferred building locations in terms of landscape or visual effects.

Unlike many applications where BLAs are used to help manage landscape outcomes, in this case the Applicant has chosen not to use the geotechnical BLAs to guide visual integration or minimise landscape effects. This reflects the Applicant's desire to allow future landowners greater flexibility in choosing building locations within the large lots proposed.

In response, the landscape assessment began by using the Geotechnical BLAs as a starting point for analysis. While respecting the Applicant's preference for flexibility, the landscape analysis identified where additional controls were needed to manage potential adverse effects on landscape character and visual amenity.

In some cases, this led to the introduction of landscape-based controls, such as "Landscape BLAs" and building setbacks, to ensure that buildings are located in a way that responds appropriately to the character and sensitivity of the landscape. These landscape controls were designed to accommodate the geotechnically suitable areas, thereby ensuring each lot retains a buildable site while also mitigating landscape and visual effects.

Through this approach, the assessment strikes a balance between enabling development flexibility and safeguarding landscape values, with recommended controls ensuring that potential adverse effects are appropriately managed.

***Working rural landscapes can still be perceived as 'natural'***

The ponds on the Site are remnants of mining activities.[6] During the site visit, it was clear the water courses are primarily drainage, involving ditches and channels. Naturally revegetating areas of the Site entail novel ecosystems,[7] which contribute to landscape[8]

[6] Ibid.
[7] Ibid.
[8] In terms of landscape, these features have 'natural' qualities involving:
- relatively unmodified and legible physical landform and relief.
- the landscape being uncluttered by structures and/or obvious human influence.
- the presence of water (lake, river, sea).
- the presence of vegetation (especially native vegetation) and other ecological patterns.

naturalness.[9] The Ecologist recommends the regenerating native forest extending east to the boundary with Lot 17 is protected. The recommendation references landscape related policy in the PTTPP including characteristics of the rural area which are important to the community and tourism[10] such as water bodies, vegetation and the absence of built up areas.[11] The landscape analysis identified other areas of vegetation on the Site would absorb and buffer the proposed rural residential development. As outlined in the report below, this vegetation should also be kept. In combination, the measures would enhance the natural character of the area and contribute to the landscape's intrinsic value.

***The development scenario for assessment purposes***

No building development of Lots 1 to 15 is to occur as part of the proposed subdivision consent but is expected in the future. A volunteered consent notice would restrict development to one main residential dwelling and one minor residential dwelling per allotment. The assessment adopts this scenario, with assumed residential infrastructure such as water tanks[12], driveways, garages, fences and exterior lighting. Hereafter, references to the "proposal", "subdivision" and "proposed rural residential development" address this development scenario.

***Impact of earth mounds on establishment rates of new planting***

Plantings on earth mounds are likely to establish more quickly. Factors include better drainage, access to a more diverse species list and, in terms of screening - a start point that is elevated relative to natural ground. Planting on mounds would lessen the establishment times and reduce the maintenance period nominally from 5 to 3 years. Planting on earth mounds is discussed later in the report with respect proposed lot 15.

## Landscape Context

The site is located on the east edge of Addison Flat; a large outwash plain below Caroline Terrace and Bucklands Peak[13]. Addison's Flat involves coastal marine deposits of beach

[9] Consistent with this endorsement, a 'natural' landscape does not require a pristine indigenous environment. At base, it is the perception of 'naturalness' through which natural features or landscapes are identified. This can include parts of highly modified ecosystems (including farmland) where the landform remains relatively intact and the perceptions of human artefacts are limited. Both the King Salmon and Man o War decisions validate this view, noting that human engagement and intervention do not necessarily detract from or diminish the level of naturalness and, in some instances, can act to 'enhance the natural character of an area' and contribute to a landscape's intrinsic value. Put simply, some working rural landscapes can still be perceived as 'natural'.( https://www.boffamiskell.co.nz/news-insights/landscape-debunking-the-absolute-protection-myth )
[10] PTTPP NENV – O1
[11] PTTPP RURZ Overview
[12] A minimum of 45,000 litres of water shall be maintained at all times as a static firefighting reserve. Alternatively, a 7,000-litre firefighting reserve is to be made available in association with a sprinkler system. (Application p. 12).
[13] Paparoa Range

sand and nearshore gravel and sand. Much of the dark-coloured sand contains concentrated heavy minerals including gold.

Caroline Terrace is an uplifted interglacial terrace, comprising fan gravels. It rises on the east side of Addisons Flat in a steep, vegetated escarpment. The terrace scarp is the immediate visual backdrop to the flats, particularly for users of SH6 and Wilsons Lead Road.

The Charleston gold rush led to discovery of gold rich "leads" in 1867[14]. Gold discovery briefly swelled the local population at Addisons Flat to several thousand.[15] The town site was located 1.5 kilometres south of the Site on the banks Mary's Creek. Addisons cemetery marks the site. Visual signs of mining have has been absorbed into the landscape by time and natural revegetation. Place names connected with gold rush, such as Addisons Flat and Wilsons Lead Road[16] persist to present day.

Areas of Addisons Flat are managed by Pāmu Farms of New Zealand Ltd[17]. Most likely capital inputs and economies of scale maintain the pastoral rural character of Addisons Flat west of SH6.

Manmade ponds such as those on the Site dot the landscape, particularly along the base of the Caroline Terrace escarpment where there are several such ponds. Evidently it was thought the gold was concentrated there.[18]

### The Site

Although the ponds are not natural, they have values including habitat, aesthetic quality and amenity, including open space. These values mean the last vestiges of goldmining could be woven / repurposed to enhance amenity pertinent to proposed rural residential development.

### Neighbours

The northern neighbour's property has regenerating bush cover. The south neighbour's property is pastoral. Pāmu, and DOC land are located opposite the Site adjacent SH6. [19]

The neighbour's house on Lot 2 DP 360520 has a view across the southern part of the Site in which BLAs 7 – 12 are proposed. No other dwellings have views of the Site.

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[14] 27th April

[15] Trich Devescovi pers.comm. Archivist and Researcher. Westport Genealogy & History Group

[16] The first discoverer of gold & one of the major gold leads discovered

[17] Landcorp Farming Ltd is a state-owned enterprise owned and controlled by the New Zealand government. It is New Zealand's largest farming enterprise.

[18] It is thought (McPherson 1978) that most of the heavy minerals were derived from high-grade schists and gneisses of the Southern Alps, brought down by Westland rivers and concentrated by the northwards-moving longshore drift.

[19] This section in an inventory rather than a statement as to parties potentially affected by the proposal, which is addressed later in the report.

## Site features

Figure 1 below shows (Lot 18) the proposed road into the subdivision would follow the existing Site tracks. Ridge landforms i.e., slightly elevated areas of the Site are mapped in Figure 1. The ridges affect the extent to which areas of the Site are visible from the surrounding area. Ridges are discussed in more detail below.

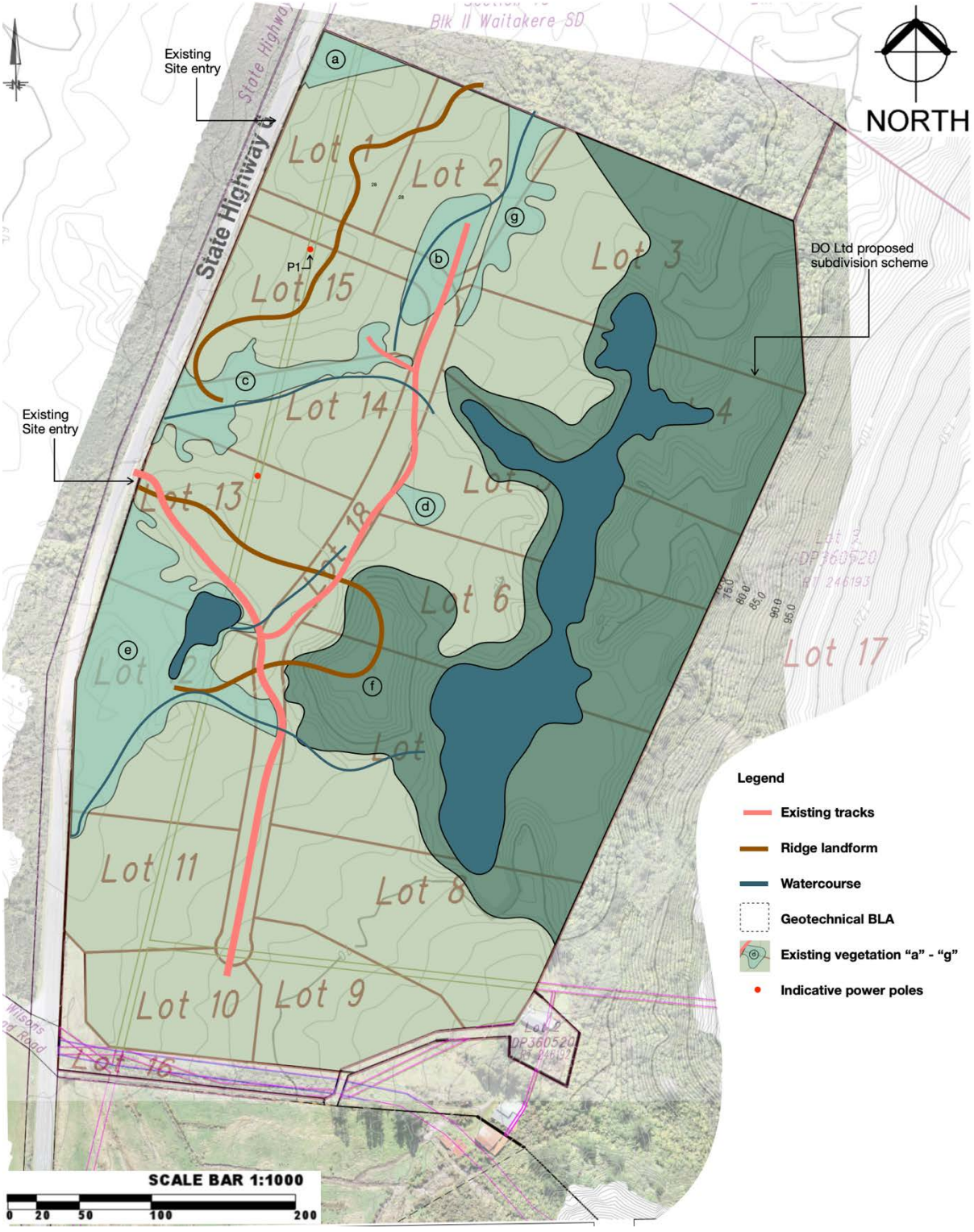
## Areas of vegetation

Vegetation on the Site is mapped “a” to “g” on Figure 1. At the north end of the Site “a” and “b” are mānuka shrublands that extend along the north Site boundary. “f’ surrounds the ponds and extends to Lot 17. Mapping vegetation “f” is (provisionally) the vegetation the ecologist recommends covenanted. It involves regenerating kāmahi forest with emergent kahikatea, rimu and southern rata. “c” is flaxland which follows the main pond outflow channel which would be located within proposed Lot 14. “d” is a stand of cabbage trees and mānuka shrubland. “e” surrounds a smaller pond located beside SH6. “g” is mānuka shrubland that extends a narrow finger south, from the north Site boundary. Wilding pines are scattered throughout the Site and the wider landscape. Vegetation “e”, and the tailings pile within proposed Lot 6 & 7, form a “pinch point” that divides the Site into two distinct areas (north and south) when viewed from SH6.

## Vegetation and capacity to absorb development

The Site’s vegetation and landforms underpin capacity to absorb development without significant impact on the rural landscape. Chief among these are low ridges which visually screen areas of the Site located further inland. Ridges are mapped on Figure 1. The current vegetation and landforms mean that development on proposed Geotechnical BLAs 2, 3, 4, 5, 6 and 14 (Fig. 1) will be absorbed into the landscape. In other words, absorption capacity involving vegetation and landforms is approximately 50% of the proposed development. The vegetation also enhances landscape naturalness which, as noted above involves the landscape being uncluttered by structures and/or obvious human influence (Footnote 8), the presence of water and the presence of vegetation, especially native vegetation. For these reasons, it is recommended that vegetation areas “a” – “e” & “g” be kept and clearance controlled, to preserve flexibility for future owners to undertake management. A recommendation addressing this is included.

Figure 1. Existing Site features



# PTTPP

In the PTTPP the Site is not located in an Outstanding Natural Landscape or Feature. Neither is it in the Coastal Environment Area.[20]

Aside from generally being a working environment – with farming, mining, tourism, horticulture, and forestry being undertaken alongside a number of smaller industries, rural environments are also, in some instances, residential environments – characterised by a lower levels of built development and greater separation distance from neighbours.[21]

The rural area is characterised by its open vistas and natural features that are of importance to the wider community. Relevant to the Site, components of the rural area include the waterbodies, vegetation and the absence of built-up areas.[22] These characteristics of the rural area inform the objective of subdivision that achieves patterns of land development that are compatible with the purpose, character and qualities of the general rural zone.[23] Compatibility between the subdivision and the surrounding landscape is discussed detail below.

Importance of the rural area to the wider community includes to tourism across the West Coast/Te Tai o Poutini which strategically[24] requires recognition and protection of the natural character, landscapes and features, ecosystems and indigenous biodiversity that contribute to the West Coast's character and identity and Poutini Ngāi Tahu's cultural and spiritual values.[25,26] The objective is to incorporate these matters into subdivision design and development so that …, natural, ecological, historical and Poutini Ngai Tahu features and resources are protected, and development responds to the physical characterises and constraints of the site and surrounding environment.[27] This is to be achieved by enabling subdivision that is consistent with the purpose, character and qualities of the zone and maintains the integrity of the zone with lot sizes and dimensions sufficient to accommodate intended land uses.[28]

### Policy relevant to assessment - Subdivision outside of settlements

Addressing rural amenity and character outside of settlements, such as the proposal involves, should enable a variety of activities to occur while maintaining rural amenity and

[20] For review of the District Plan, Council commissioned district wide assessment and technical reports identifying outstanding natural landscapes and features, and the extent of the Coastal Environment Area and the level of naturalness of the Coastal Environment Area.
[21] TTPP RURZ Overview
[22] TTPP RURZ Overview
[23] TTPP Obj SUB - 01
[24] TTPP NENV
[25] TTPP NENV – O1
[26] TTPP Obj SUB - O3
[27] TTPP Obj SUB – O3. NB. “significant” in that objective is not relevant to the Site.
[28] TTPP Policy SUB – P1

character. Outside of settlements, activities should: seek to maintain privacy and rural outlook for residential buildings and achieve development that is compatible with existing development and the surrounding area, including appropriate setbacks from the road, natural and cultural features, minimising adverse visual effects if sited immediately adjacent to public roads. [29] The policies also advise recognition of the character and form of rural infrastructure including road side ditches rather than kerb and channel, absence of street lights and urban style footpaths.[30]

### Policy less relevant to the Site - Subdivision on the outskirts of existing settlements

The objectives and policies provide for living circumstances on the outskirts of existing settlements[31] [32]. The Site is not located on the outskirt of a settlement; however, policy advises large lots with onsite servicing, a mix of activities, dominance of open space and plantings over buildings and setbacks from property boundaries,[33] and development that does not compromise the dominance of the natural and cultural setting.[34] These qualities point to the type of subdivision that would be more appropriate in the context.

### Compatibility between development and the areas character and qualities

With respect to sites that are located outside of settlements - such as the Site, subdivision is regarded as one of a variety of possible activities in the rural zone that is required to maintain rural amenity and character. Policy references compatibility with and consistency with the surrounding area ("**baseline"**). Considering this further involves:

i. Enabling subdivision that that creates allotments that are consistent with the purpose, character, and qualities of the applicable zone,[35]
ii. Subdivision achieves patterns of land development that are compatible with the purpose, character and qualities of each zone[36]
iii. Compatibility with existing development and the surrounding area.[37]

To ascertain consistency between proposed development and the surrounding landscape, the area between SH6 between the SH67 / SH6 turn off and Marys Creek ("**Upper Addison Flat**") was analysed.[38]

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[29] TTPP RURZ – P1 b, c, d & e.
[30] TTPP RURZ – P11
[31] TTPP Obj RURZ – O3 & P2
[32] TTPP Obj RURZ – O2 & P4
[33] TTPP Policy RURZ – P4
[34] TTPP Policy RURZ – P2
[35] TTPP RURZ – P1
[36] SUB – O1
[37] SUB – P1a
[38] Available on request, but for report brevity not attached.

*Baseline character and qualities*

Analysis identified landscape characteristics west and east of SH6 that differ. Pāmu land west of SH6 is the most uniform. East of the road the landscape has more varied landforms; hills, scarps, ridges and flats. There are clusters of rural residential and tourism activity set amongst areas of regenerating native bush. There are also activities that are not visible because the surrounding bush.[39] This illustrates the capacity of the area east of SH6 to absorb development. This quality of the landscape was discussed previously in relation to the Site and the recommendation to retain vegetation "a" – "e" (Fig. 1).

As noted, development on proposed BLAs 2, 3, 4, 5, 6 and 14 will be absorbed into the landscape. Of the 15 BLAs proposed, that will leave 8 BLAs technically visible from the surrounding area. The analysis indicates the "Upper Addison Flat" area could sustain partial visibility of 3 – 4 building clusters with otherwise affective visual screening of the wider development, maintenance of the privacy and rural outlook from existing residential buildings and a dominance of open space and plantings over buildings. Therefore, to ensure the subdivision (particularly at the south end of the Site), would be consistent with the surrounding area, development controls are required to address visibility of an additional 4 to 5 BLAs. Recommended mitigation, including Landscape BLAs, building setbacks, planting and other controls addressing this issue are detailed later in the report.

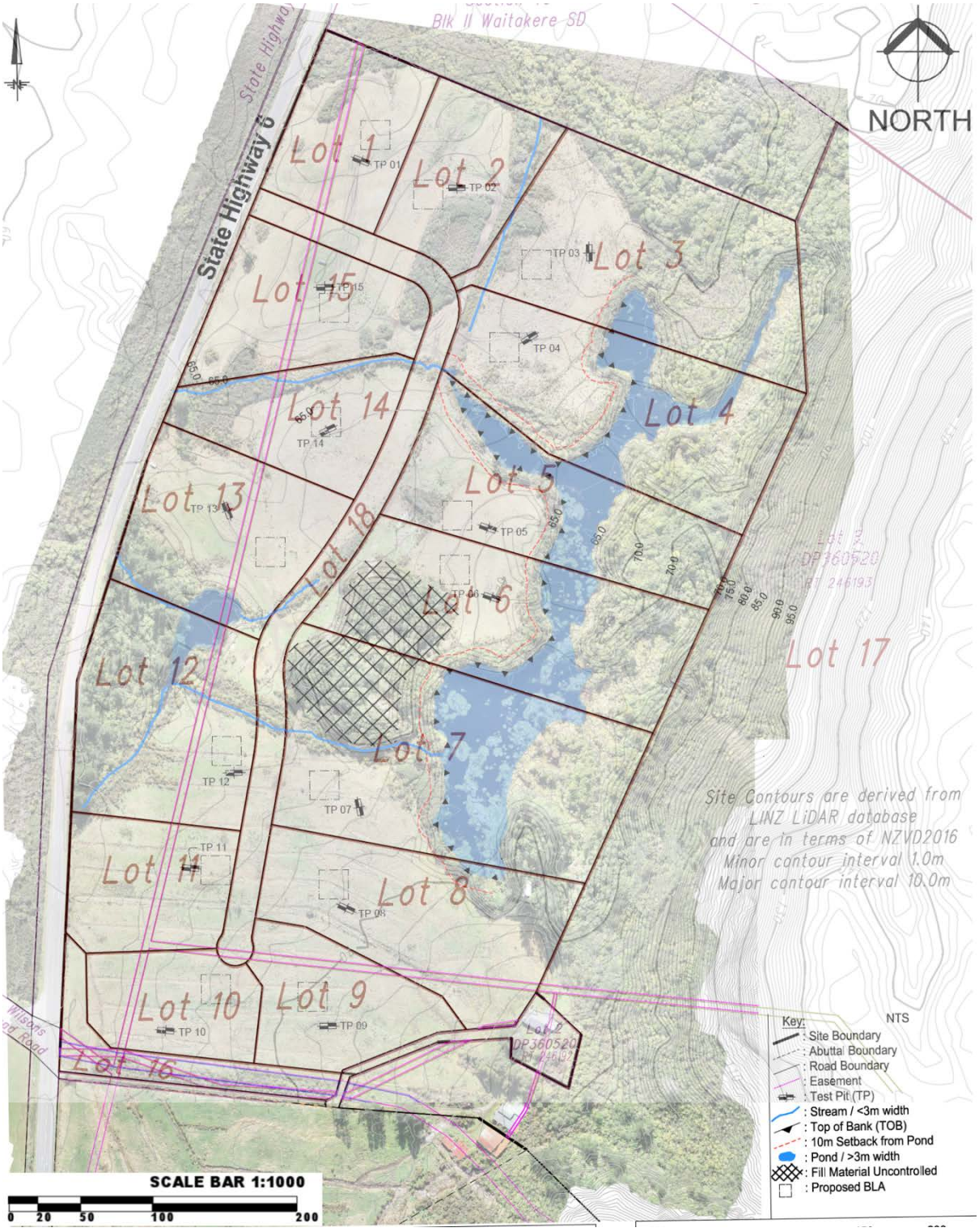
It is important to note that whilst compatibility and consistency with the surrounding area informs the assessment, it is only one or several factors to consider.

## Proposal development

The proposal is an 18-lot fee simple subdivision of Lot 3 DP 360520 in general accordance with the plan attached below in Figure 2.

[39] Visible signs are vehicle entranceways off SH6.

Figure 2. Proposed development




Source: Fig.1 Geotechnical report, Scheme Plan 1.25 (Application) & Contours

Proposed Lots 1 to 15 will have net site areas of between 0.8 hectares (Lot 10) and 3 hectares (Lot 7) and are intended to be sold for rural-residential purposes.

Building is expected on Lot 1 – 15, however no building is intended on Lots 16, 17 or Lots 4 and 5 DP 360520. The Geotechnical BLAs (Fig. 2) ensure each allotment has a suitable building site from a geotechnical perspective.

The Applicant has volunteered a consent notice to be registered on the new titles restricting residential development to one main residential dwelling and one minor residential dwelling being constructed per allotment.

## Landscape and Visual Effects

### Nature of effects

Based on the foregoing, the nature of effects is reduced rural character because of proposed development that is out-of-keeping with typical rural activities including, reduction in open vistas and natural features relative to the presence of buildings[40] and residential infrastructure such as roading and water tanks. Reduced open space in terms of the paddocks involving open vistas and natural features viewed from SH6, Wilsons Lead Road and the dwelling on Lot 2 DP360520 (Fig. 2).

### Degree/ Magnitude of effects

Factors that influence the degree of effects are the extent to which the proposal:

i. Achieves a development pattern that is compatible with the purpose, character and qualities of the rural zone[41] and that maintains the amenity and rural character values.[42]
ii. Maintains rural amenity and character characterised by[43]:
    a. Buildings and structures that have a bulk and location that is characteristic of rural environment;
    b. Maintain the privacy and rural outlook from residential buildings;
    c. Compatibility with existing development and the surrounding area (see discussion above);
    d. Have appropriate setbacks from the road;
    e. Minimise adverse visual effects if sited immediately adjacent public roads
    f. Analysis includes awareness of cultural landscapes.

***Positive effects***

Measures such as keeping and controlling clearance of vegetation areas “a” – “e” & “g”, covenanting vegetation “f” and establishing new planting will have positive effects[44] by ensuring the dominance of open space and plantings over buildings, enhanced landscape naturalness and intrinsic landscape value.

[40] TTPP RURZ Overview
[41] TTPP Obj SUB - 01
[42] TTPP Obj RURZ - 01
[43] TTPP RURZ – P1
[44] RMA s3(a).

*Scenario involving "low" potential adverse landscape and visual effects*

Development that would equate with a low level of effect according to Table 4[45] involves:

- A landscape pattern largely compatible with the surrounding area, entailing partial visibility of 3 – 4 building clusters and otherwise effective visual screening of the development,
- The maintenance of privacy and rural outlook from the residential building on Lot 2 DP360520,
- Large lots that enable onsite servicing, a mix of activities, dominance of open space and plantings over buildings and appropriate setbacks from property boundaries,[46] so as to minimise adverse visual effects from public roads and dominance of the natural and cultural setting[47]

Table 2. Level of effects[48]

| less than minor | minor | more than minor |
|---|---|---|

| very low | low | low-mod | moderate | mod-high | High | very-high |
|---|---|---|---|---|---|---|

# Proposed Development and Recommended Mitigation

Potential landscape and visual effects are assessed in the section below. The assessment uses eight viewpoints (Fig. 3) and the Geotechnical BLAs (Fig. 2). The viewpoints on SH6 are selected for their correlation with views into the Site. There are other views from the road in which the Site is screened by landform and / or vegetation labelled "a" – "g" (Fig. 3). Retaining the vegetation will reduce the visual impact of the proposal (Refer note above - ca. 50% BLA screened) and anchor new recommended plantings "i" – "xv".

Where limits on building heights and earth mound heights are discussed, these are above natural ground.

As noted, vegetation "e", and the tailings pile within proposed Lot 6 & 7, form a "pinch point" that divides the Site into two distinct areas (north and south) when viewed from SH6. Accordingly, the views analysed are grouped into three areas. The results presented at the end relate to areas 1 – 3 shown on Figure 3 below.

[45] Because there is no land use consent, the impact of new planting on the results assumes planting commencing (arbitrarily) at a grant of subdivision consent – as though it were a land use consent authorised building development.
[46] TTPP Policy RURZ – P4
[47] TTPP Policy RURZ – P2
[48] NZLAG 2022. p.151.