



Memorandum

☐ **Auckland**
PO Box 91250, 1142
+64 9 358 2526

☐ **Hamilton**
PO Box 1094, 3240
+64 7 960 0006

☒ **Tauranga**
Level 5
35 Grey Street
PO Box 13373, 3141
+64 7 571 5511

☐ **Wellington**
PO Box 11340, 6142
+64 4 385 9315

☐ **Christchurch**
PO Box 110, 8140
+64 3 366 8891

☐ **Queenstown**
PO Box 1028, 9348
+64 3 441 1670

☐ **Dunedin**
PO Box 657, 9054
+64 3 470 0460

Attention: Kim Smith

Company: Rotorua Lakes Council

Date: 23rd June 2022

From: Rebecca Ryder

Message Ref: Pukehangi Development Area Structure Plan – Housing Amendment Bill

Project No: T17006

Dear Kim

Following a request to undertake a review of the proposed outcomes of the Medium Density Residential Standards (MDRS) in the Pukehangi Development Area. The key area of investigation focuses to the proposed building heights of medium density standards on the residential 1 zone areas of the development area and the potential effects on the landscape values of the area including the Rotorua Caldera Rim.

Background

The background landscape context, to this opinion, is found within the earlier Landscape and Visual Effects Assessment¹. This assessment found:

- *The subject site contains both an upper terrace, at RL367 to RL380 that represents the 60,000-year-old shoreline, and a lower terrace below RL349 which represents the 36,000-year-old shoreline. These ancient shorelines contribute a distinct landform within the site.*
- *The Caldera Rim provides a defined backdrop to the Rotorua Lake area, encapsulating urban Rotorua, and other townships surrounding Lake Rotorua, including Ngongotaha, Hamurana, Mourea and Owkata.*
- *The broader landscape context provides the ability for this site to absorb the proposed land use change that the proposed development introduces. The proposal aligns development with existing surrounding development areas and focusses lower density development in the more sensitive mid-site escarpment area. Lower density development within the mid-site escarpment contributes an opportunity to align with broader vegetation patterns, providing a transition between the dense native planting within the Parkland Estate development and the pastoral landscape, more typical of the Caldera Rim landscape.*
- *Importantly, development is confined beneath RL385, identified as the contour representing the Caldera Rim, in the Caldera Rim Report. This ensures the protection of the recognised broader representation of the Caldera Rim landscape and feature.*
- *The Structure Plan takes account of these values, through measures such as placing lower-density development in the more sensitive areas and beneath RL385 to preserve the contiguous rural backdrop that the Caldera Rim provides, and aligning Primary Roads suitable distances away from existing, adjoining development boundaries, to ensure positive interfaces are achieved. Archaeological finds protocol will be applied and followed through the mechanisms of the Heritage*

¹ Pukehangi Heights Development Area Structure Plan, Landscape and Visual Effects Assessment, Boffa Miskell Ltd, 6th March 2019.

New Zealand Pouhere Taonga Act 2014, alongside the preliminary archaeological assessment, already undertaken.

- The sensitivity of the landscape resource is considered to be moderate.*
- The planning provisions proposed address matters including size, scale, form, colour and density of built form and other elements contained within the development. This introduces an approach that responds to the landscape, which ensures the visual prominence of built form is mitigated, and elements such as earthworks are reduced.*
- The development would be phased over time, with built-form extending over the development extent. Vegetation would mature alongside these development phases, nestling built form into the visual landscape. The proposal is considered irreversible, but preserves the key features captured within the visual extent, being the Caldera Rim.*
- The magnitude of visual change is considered to be moderate-low as a result of the proposed development outlined in the Structure Plan and accompanying planning provisions. It is recognised that the proposal does introduce a defined change from the current visual outlook, particularly for the adjoining residential viewing audience.*

Key outcomes of the provisions, sought from the preliminary assessment, development of the structure plan and from this assessment include:

- Retention of the landform typology through the site, comprising the relationship between the escarpment features and plateau.*
- Retention of a rural residential character along the escarpment face with the placement of more intensive residential housing sited on the lower and upper plateau.*
- Retention of open space near to and on the RL385 contour.*
- Management of building form and design along sensitive interfaces between the escarpment and plateau areas.*
- Management of effects of mass and minor earthworks on the landscape patterns of the site and its interface with the wider landscape patterns.*
- Management of landscape character and the transition between existing rural, rural -residential (Parklands) and residential areas. This will include but is not limited to; lot density, building height and form, vegetation patterns and landform.*

Proposed Changes to Part 3 – Area Specific Matters

The proposed changes to the rule framework for the Pukehangi Development Area that respond to providing for medium density housing are area specific to the lower and upper terrace areas of the site, being:

Lower Terrace

- ~~1. Low density residential development;~~
2. Medium density residential development consistent with the Residential 1 Zone located on land of easy contour adjacent to local services and open space, ~~and sleeved with lower density residential development, commercial development or open space to provide a harmonious transition with existing low density residential development along Pukehāngi Road;~~

Upper Terrace

1. ~~Low~~ Medium density residential development consistent with the Residential 1 Zone; and

2. *A transitional area along the front of the Upper Terrace where additional landscape and building controls apply (Escarpment Transition Area 2).*

Specifically, the changes are moving away from low density residential development sleeving medium density housing on the lower terrace, and the introduction of medium density housing development to the upper terrace area in place of low density.

The change in density more specifically includes an increase in building height to 11m as compared to the existing residential zone rules of 9m.

Assessment

In order to determine the degree of effect of medium density housing analysis of the landform profile and the interface between building form and the dominant landform of the Rotorua Caldera Rim feature has been modelled (Refer to Attachment A).

Sensitive areas within the Pukehangi Plan change relate to the interface with Area B, shown as the Rural Zone mid escarpment, and the Caldera Rim, shown as the Upper Escarpment. Transition Areas 1 and 2 have been created at the toe and top of the mid site escarpment to manage built form density and height. These measures are key factors in the retention of the features legibility in the wider landscape and as part of the caldera.

The landform profile demonstrates that the integration of 11m building heights within the Transition Area 1 would reduce the legibility of the mid site escarpment, visually obscuring approximately the entire lower half of the escarpment. With the increased building height and density now proposed under the MDRS for this area, there is potential for this sensitive landscape feature to be visually dominated by urban development.

For the Escarpment Transition Area 2, at the top of the mid site escarpment, the design measures of the transition zone were to minimise density and manage building scale, form and colour to minimise a dominant urban building line at the rural zone interface. This measure remains important to avoidance of dominance built form along the rural edge.

For the Upper Escarpment, where the Caldera Rim is identified as being part of a Sensitive Rural Area² which features the upper edge of the Lake Rotorua Caldera Rim. This feature is protected from urban development through zoning and the built form interface is designed to remain subservient, in the wider viewing catchment, to the landform and rural backdrop.

The upper terrace, originally proposed as Residential 1 zone of 9m in height, is now proposed under the MDRS as 11m of medium density housing. The original design response to the structure plan to respond to landscape sensitivities considered the interface and building typology carefully. With the increase in density and building heights of 11m with the ability to increase to 12m for architectural outcomes, there will be a likely loss in visual legibility of the Caldera Rim feature within the Structure plan area. The cross section in Attachment A demonstrates that the proposed 11m building height, would visually obstruct views of approx. 50% of the Caldera Rim feature (Sensitive Rural Area - SRA) but retain views beyond the structure plan boundary to the ridgeline of the rim.

The original structure plan response did not identify the need to manage a transition zone at this interface due to the flat landform of the upper terrace and likely earthworks lowering the built form further down the Caldera Rim SRA slope. With this method likely to remain a development outcome and coupled with the continuation of the SRA beyond the site, the visibility of the southwestern most area of the proposed medium density area will be obscured by the middle sections of the zone. There remains enough elevation at the SRA beyond the site to maintain the dominant the physical and sensory characteristics of this feature in the wider landscape.

There are other areas where the SRA lowers in elevation and it is here that building height should be considered to respond avoiding the immediate edge of the upper terrace with the upper escarpment being elevated above the main terrace and creating a dominant linear edge of built form obscuring the caldera rim within the SRA.

² Refer Page 25 - <https://www.rotorualakescouncil.nz/repository/libraries/id:2e3idno3317q9sihrv36/hierarchy/our-services/planningservices/districtplan/districtplanproposed/documents/Caldera%20rim%20report-design%20guidelines.pdf>

Recommendations

Based on the proposed changes under the MDRS and the analysis of the SRA features and mid site escarpment the integration of 11m high, potentially 12m, medium density development has the potential to in parts increase the adverse effects on the landscape values of the Rural Zone and SRA. Therefore the following recommended approaches are considered methods to maintain these values whilst integrating the MDRS into less sensitive areas of the site.

Transition Area 1 – Toe of Mid Site Escarpment

- Retain the building height and design controls for the interface, whilst enabling the increase in density along the toe of the escarpment. Avoidance of a linear wall of medium density housing should be avoided at this sensitive interface.

Transition Area 2 – Top of Mid Site Escarpment

- Retain building height and design controls, including building density along the transition zone, creating opportunity for transition of private open residential space to rural open space. Avoidance of a linear wall of medium density housing should be avoided at this sensitive interface.
- Retain PHDA-D3 provisions.

Toe of Upper Escarpment

- Consider lowering the RL building line restriction of PHDA-P7 to RL383 to account for the increase in building height across the zone and visual dominance upon the upper escarpment within the SRA, or
- Retain a medium density housing typology but retain a building restriction of 9m, to protect the legibility of the SRA.
- Integrate a requirement for spatial separation between medium density blocks within a subdivision to open views to the SRA and upper escarpment, avoiding a linear block of medium density housing. Avoidance of a linear wall of medium density housing should be avoided at this sensitive interface.

Summary

There is suitable capacity within the Pukehangi Structure Plan to accommodate medium density housing under the MDRS whilst not occupying all of the sensitive areas of the site. The current structure plan has integrated open space and legibility of the sensitive landscape features based on an interface of suburban residential housing, in the main. The introduction of blanket 11m and up to 12m building heights across the residential 1 zone creates areas where adverse effects on the landscape features will be increased.

The above recommendations are responsive to the site for the zone and where possible integrate further open space within the subdivision design to connect and integrate the sensitive landform features. This includes extent of medium density housing on the upper terrace, not currently considered within the existing structure plan provisions.

Rebecca Ryder

Partner | Landscape Architect

Boffa Miskell Ltd



