

Please specify below-

- i. The matters within the application that you support or oppose or wish to comment on.
- ii. The reasons for making this submission (please give details)

- i. Analysis of any adverse landscape effects that may occur because of the proposed building platform being within 200 m of existing and proposed dwellings.
  - With Reference to: [RM3030 – Clark & Megan Campbell – 239d Moturata Road – Response to Request for Further Information \(.pdf \(PDF, 9MB\)\)](#)
- ii. The analysis of any effects that may occur because of the proposed building platform being within 200 m of existing and proposed dwellings is not accurate or supported by appropriate evidence. The analysis and associated visualisations have been made / taken from the perspective of the applicants property rather than from the perspective of potentially effected parties.

The analytical approach taken is contrary to the New Zealand Institute of Architects Guidelines, that state:

*“Visual effects*

*Undertake an assessment of visual effects—the effects on landscape values as experienced in views.<sup>260</sup> The common method is to:*

- *° identify the ‘visual catchment’ (where the proposal will be seen from)*
- *° identify typical ‘audiences’ (who will see the proposal)*
- *° describe the nature and degree of effects on landscape values*
- *in views from certain viewpoints (e.g. affected properties, representative public viewpoints).*

*Describe the visual catchment. ZTV diagrams and maps of visual catchment may be useful in some situations. The point of such analysis is to help identify the spatial extent of visibility. Use judgement as to whether such analysis will be useful in understanding effects. Often the locations from which visual effects will be experienced are close to a proposal and obvious. Effects are likely to be least near the margins of visibility. Deciphering such margins may therefore not be useful. Determining actual visibility will also require field work to ground-truth desk-top analysis.<sup>261</sup> Remember that seeing an object does not in itself constitute an adverse effect.*

*Describe the groups of people associated with the area from where the proposal will be seen—the ‘audiences’ or potentially affected people. For instance, people living on properties in the area, passers-by on roads, users of a beach, residents of settlements. While it was previously common to assign a sensitivity rating to audience types (e.g. residents as more sensitive than passers-by), it is better to simply describe the audience. Residents, for example, are likely to cover a range of sensitivities to certain activities and they are better placed to describe that themselves. Likewise, ‘sensitivity’ depends on the relationship between the person and the proposal and the context (a passer-by may be very sensitive to adverse effects on the heritage character of their own town centre but not be sensitive at all to effects on a nearby retail strip, for example).*

*Select viewpoints to represent places the proposal will typically be seen from.*

- *° Consideration of private views typically focuses on views from*

*houses, although it is worth acknowledging that people may also enjoy views from other parts of their property. A common technique is to interpolate effects based on a combination of desk top analysis and observations from public places (such as road-side). Be clear in explaining this if this is the method used. Such assessments are often tabulated for individual properties or groups of properties. “*

Sited 18 05 2024 at

[https://nzila.co.nz/media/uploads/2022\\_09/Te\\_Tangi\\_a\\_te\\_Manu\\_Version\\_01\\_2022\\_.pdf](https://nzila.co.nz/media/uploads/2022_09/Te_Tangi_a_te_Manu_Version_01_2022_.pdf)

The proposed subdivision and potential development will have an adverse impact on sight lines, not to the proposed building site (as subject) but beyond, in the context of views of the coastal environment. The analysis on the visual effects have not in any sense addressed the holistic effects and the very real human relationships with the broader whenua.

The proposed subdivision and potential building development breaks our connection with the whenua.

Our physical association through unimpeded sight lines up the coast, Moturata Island, Taieri Mouth and beaches to the north would be significantly disrupted.

Through this physical disruption, our associative and perceptual relationships with the whenua become irreparably damaged through the loss of the constant physical reinforcement of connection.

The assessment tabled does not acknowledge the physical, associative or perspectival relationships with the whenua. This too, runs contrary to the NZILA Guidelines.

Sited 18 05 2024 at

[https://nzila.co.nz/media/uploads/2022\\_09/Te\\_Tangi\\_a\\_te\\_Manu\\_Version\\_01\\_2022\\_.pdf](https://nzila.co.nz/media/uploads/2022_09/Te_Tangi_a_te_Manu_Version_01_2022_.pdf)

Pages 71 – 80.

This potential hollowing out of our relationship with the whenua ultimately negatively impacts on the health and wellbeing of residents within the subdivision who chose to buy into the area on the understanding that sight lines had been carefully considered and were, to some extent protected.

## **In Summary**

1. We do not support the application due to inaccurate and inappropriate information tabled by the applicant and associated agents, contrary to NZILA Guidelines.
2. We do not support the application due to the physical disruption of our sightlines. This leads to our associative and perceptive relationships with the whenua becoming irreparably damaged through the loss of the constant physical reinforcement of connection. The assessment tabled does not acknowledge the physical, associative or perceptual relationships with the whenua. This too this too, runs contrary to the NZILA Guidelines.