

Landscape Peer Review

SHANNON FARM

Prepared for Central Otago District Council, Att Oli McIntosh

24 February 2026

Applicant:	New Zealand Cherry Corp (Leyser) LP
Application:	Resource Consent is sought to increase the density of lots within Rural Lifestyle Area 3 (RLA 3), Rural Lifestyle Area 4 (RLA 4), and Rural Lifestyle Area 6 (RLA 6)4 within RRA (5).
Location:	112 and 144 Ripponvale Road, Cromwell
Zoning:	The Site is located within Rural Lifestyle Area (5), and within an area with a Significant Amenity Landscape overlay.
Activity Status:	Non Complying



Boffa Miskell is proudly a
Toitū net carbonzero certified consultancy

Document Quality Assurance

Bibliographic reference for citation:

Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*,. Report prepared by Boffa Miskell Limited for Central Otago District Council.

Prepared by:	Megan Harshey Principal NZILA Registered Landscape Architect Boffa Miskell Limited	
Reviewed by:	Sue McManaway Senior Principal NZILA Registered Landscape Architect Boffa Miskell Limited	
	Revision / version:	Issue date: 24 February 2026

Use and Reliance

This report has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Boffa Miskell does not accept any liability or responsibility in relation to the use of this report contrary to the above, or to any person other than the Client. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate, without independent verification, unless otherwise indicated. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.

CONTENTS

1.0	Introduction	1
2.0	Purpose and Method of Review	1
3.0	Methodology	2
4.0	Existing Landscape	3
	Receiving Environment	3
	The Site	3
	Landscape Values	4
5.0	The Proposal	4
6.0	Statutory Context	5
	Plan Change 14 Overview	6
7.0	Visual Effects Assessment	7
	Visual Effects Assessment	8
8.0	Landscape Effects Assessment	10
9.0	Assessment Against the Relevant Policy Provisions	11
10.0	Conclusion	14
	Suggested Conditions (if consent is granted)	15

1.0 Introduction

- 1.1 Boffa Miskell Limited (BML) has been engaged by Central Otago District Council (CODC) to peer review the Landscape Assessment prepared by Rough Milne Mitchell Landscape Architects (RMM) regarding a resource consent application to intensify development within Shannon Farm. The proposed subdivision will create 44 additional rural lifestyle allotments across Rural Lifestyle Areas (RLA) 3, 4, and 6, including associated building platforms and access improvements (R250155).
- 1.2 The proposal is located at Shannon Farm, Ripponvale Road, Cromwell, within the Cromwell Basin. The application site comprises approximately 19.6 hectares within the wider Shannon Farm development which is currently under construction following earlier consents.
- 1.3 The property is located within the Rural Resource Area 5 (RRA5) as defined by the Central Otago District Plan (CODP). Parts of the site fall under a Significant Amenity Landscape (SAL) overlay, particularly within RLA6 and portions of RLA3 and RLA4. No development is proposed within the Outstanding Natural Landscape (ONL) or designated No-Build zones identified in the Structure Plan.
- 1.4 Under Rule 4.7.5(iii), the proposed subdivision is classified as a non-complying activity because it breaches the minimum allotment sizes specified in Rule 4.7.2 for RLA3 and RLA4, introduces multiple lots within RLA6 where only one allotment was anticipated, and results in a total number of residential lots exceeding the 160-lot threshold for RRA5.

2.0 Purpose and Method of Review

- 2.1 The purpose of the peer review is an appraisal of the Landscape Assessment undertaken by RMM rather than a parallel assessment. The following landscape peer review follows the concepts and principles outlined in *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*¹ (the 'Guidelines').
- 2.2 The focus of this peer review is to confirm (or not) that the Landscape Assessment undertaken by RMM:
 - follows a sound methodology and method for the purpose,
 - considers the relevant statutory provisions and any relevant 'other matters',
 - accurately describes, interprets, and evaluates the relevant landscape character and values,
 - analyses the effects on landscape values in a balanced and reasoned way,
 - reaches credible findings supported by reasons, and
 - makes appropriate recommendations with respect to findings².

¹ *'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'*, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

² The Guidelines, paragraph 6.61.

2.3 The following documents have been relied on in the preparation of this peer review:

RM250155 Application:

- Landscape Assessment Report, 44 Proposed Lots Shannon Farm, prepared by RMM, dated 9 June 2025
- Shannon Farm Proposed Intensification of Lots, Graphic Attachment to Landscape Assessment Report, prepared by RMM, dated 9 June 2025
- Assessment of Environmental Effects , 112 and 144 Ripponvale Road, Cromwell, prepared by JPW Consulting Ltd, dated 9 June 2025
- 20250804_ShannonFarm_GA_Earthwork_LR, prepared by RMM, dated 04 August 2025

PC14

- PC0014 APPENDIX E - Landscape and Visual Amenity Assessment, prepared by Rough and Milne, dated 20 May 2019
- Evidence of Tony Milne, prepared by Rough and Milne, dated 13 May 2020
- PC0014 Landscape Peer Review Report - Vivian Espie 20.4.20, prepared by Vivian Espie, dated 20 April 2020
- PC0014 - Landscape Response Comments - Vivian Espie, prepared by Vivian Espie, dated 28 May 2020
- AS Landscape Architect comments on revised provisions post mediation 20211116 (1), prepared by Anne Steven, dated 16 November 2021

2.4 This peer review consisted of an initial desktop review of the application documents to identify any outstanding questions prior to the Site visit. A Site visit was then undertaken on 18 July 2025 by Landscape Architect Megan Harshey of BML. The weather during the Site visit was clear and sunny. An additional site visit was undertaken on the 19 February 2025 with the applicants Landscape Architect. Visibility poles were requested and erected in central locations within each lot of those proposed within RL6, with the exception of Lot 164, which was positioned at the rear of the building platform due to the existing topography on site. The purpose of the site visit was to confirm visibility of these lots.

2.4.2.5 As part of the Site visit, the wider area surrounding the Site was also visited to understand the landscape context, landscape character and potential public/private viewing audiences.

3.0 Methodology

3.1 The RMM Landscape Assessment contains a methodology statement on page 6, which is guided by Te Tangi a te Manu and the landscape-related provisions. The methodology is considered appropriate and in line with best practice.

3.2 I agree that this is an appropriate methodology and adopt the same scale in my peer review for comparability of the degree of effects.

4.0 Existing Landscape

Receiving Environment

- 4.1 The Description of the Receiving Environment in Section 4.1 of the RMM Landscape Assessment Report is comprehensive and well-structured, providing a clear and contextually rich overview of the Cromwell Basin and the Shannon Farm site.
- 4.2 The report effectively situates the Site within its broader geographical and visual context, referencing key landscape features such as the Pisa Range ONL, the Cromwell Basin (the Basin) floor, and the Significant Amenity Landscape (SAL) overlay. The description demonstrates a strong understanding of the physical, perceptual, and associative landscape values, including the area's productive rural character, historical land use, and evolving rural lifestyle development. The inclusion of historical context, such as the site's mining and orchard heritage, supports the identification of landscape character zones.
- 4.3 The section aligns well with best practice guidance, particularly the Te Tangi a te Manu landscape assessment framework. It appropriately defines the receiving environment not just spatially but experientially, acknowledging both the visual catchment and the broader cultural and ecological context.
- 4.4 However, while the description is thorough, it could benefit from a slightly more critical reflection on the cumulative effects of ongoing development in the Cromwell Basin, particularly in relation to the SAL's evolving character. The Basin is experiencing significant rural lifestyle intensification, and without acknowledging this trajectory, the assessment risks underestimating how incremental changes are compounding the domestication of foothill landscapes.
- 4.5 Additionally, while the report notes the visibility of the Site from various public viewpoints, a clearer synthesis of how these views contribute to the perceived landscape values of the receiving environment would strengthen the narrative.

The Site

- 4.6 The report effectively situates the Site within the broader Shannon Farm development and articulates its relationship to the surrounding land uses, including the adjacent Rural Lifestyle Areas (RLAs), Rural Lifestyle Production Area (RLPA), and neighbouring large rural lots. The description is spatially precise, referencing legal boundaries, road access (Roads 001, 002, and 006), and the character zones of 'Farmland Terraces' and 'East Gully', each with distinct topographical and vegetative characteristics. The integration of the SAL overlay and its influence on the Site's development potential is clearly acknowledged, particularly in relation to the East Gully.

Landscape Values

- 4.7 The RMM Assessment uses the Te Tangi a te Manu framework to assess physical, perceptual, and associative values. The report effectively identifies the key landscape features that contribute to the area's identity, such as the Pisa Range ONL, the rolling pastoral foothills within the SAL overlay, and the productive basin floor.
- 4.8 The physical attributes, topography, vegetation, and land use are clearly described, and the perceptual qualities, including legibility, coherence, and scenic beauty, are thoughtfully articulated.
- 4.9 The associative values, including cultural heritage, recreational use, and tangata whenua connections, are acknowledged with appropriate sensitivity and relevance.
- 4.10 It successfully establishes a baseline of landscape values against which the proposed development can be assessed. The inclusion of seasonal and transient qualities, such as the changing colours of orchards and the visual impact of snow on the ranges, adds depth to the perceptual analysis.

5.0 The Proposal

- 5.1 The proposal seeks resource consent to increase the density of residential lots within Rural Lifestyle Areas 3, 4, and 6 at Shannon Farm, located within Rural Resource Area 5.
- 5.2 The total number of lots across Shannon Farm will increase by 44 to 195 under this proposal. This is created by:
 - RLA 3 will gain six additional lots, resulting in a total of 14 lots at increased density but overall, a total of 16 lots within RLA 3. Lot sizes ranging from 1,770 to 3,530 m² with an average allotment size of 2385m².
 - RLA 4 will see a more substantial increase of 22 lots, with a total of 35 lots at increased density resulting in a total of 47 lots within RLA 4 across Shannon Farm. Lot sizes range between 1,895 and 6,895 m² with an average allotment size of 3115m².
 - RLA 6 will add 16 new residential lots, totalling 17, alongside a 36-hectare balance lot retained as open pastureland. The residential allotments will range in size from 2290m² – 5150m² with an average allotment size of 3400m².
- 5.3 All 17 lots in RLA 6, six additional (11 total) residential allotments within RLA 4 and two additional (four total) residential allotments proposed within RLA 3 are within the SAL overlay. The RLA3 allotments are on the boundary of the SAL and therefore only part of the lots is covered by the SAL.
- 5.4 No development is proposed within the Outstanding Natural Landscape or designated No Build zones.
- 5.5 Access improvements include a new cul-de-sac replacing a previously consented right-of-way and an additional ROW in RLA 6.

- 5.6 Building platforms are capped at 1,000 m² with the exception of Lot 127 which is identified as containing a platform for the purposes of assessing setback breaches although it is located within the confines of RLA4.
- 5.7 Existing planning standards, such as setbacks, lighting, and fencing, remain unchanged.
- 5.8 Landscape mitigation focuses on contextual absorption rather than full screening, with planting required to follow a naturalised pattern per the approved planting schedule.

RMM have included a *Summary Table of Consented and Proposed Residential Allotments* and below is an extraction of the relevant 3 RLA areas.

Rural Lifestyle Area (RLA)	CODP Allotment Area (consented)	Consented number of lots	Proposed Allotment Area (Range)	Proposed Allotment Area (Average)	Proposed number of Lots (additional)	New (proposed) total
RLA 3 Proposed changes	Minimum 4000m²	8	1770m² - 3530m²	2385m²	6	14
RLA 3 No proposed changes	Minimum 4000m ²	2	N/A	N/A	N/A	no change
RLA 4 Proposed changes	Minimum 8000m²	13	1895m² - 6895m²	3115m²	22	35
RLA 4 No proposed changes	Minimum 8000m ²	12	N/A	N/A	N/A	no change
RLA 5	Minimum 3Ha	2	N/A	N/A	N/A	no change
RLA 6	To be held as one allotment	1	2290m² - 5150m²	3400m²	16	17

6.0 Statutory Context

- 6.1 Under the CODP the wider Site is located within the Rural Resource Area (5) (RRA5). The proposed additional Lots will occur exclusively within Rural Lifestyle Area 3, 4 and 6.
- 6.2 RLA 6 is located wholly within a Significant Amenity Landscape overlay. Six of the proposed additional lots within RLA4 and three proposed lots within RLA 3 are also partially located within the SLA overlay. The remaining proposed lots are located adjacent to the SLA overlay.
- 6.3 The application is a non-complying activity.

- 6.4 I consider that the Landscape Assessment has identified and framed a response to the relevant provisions, and I agree with this approach.

Plan Change 14 Overview

- 6.5 The applicant requested a change to the Central Otago District Plan (Operative District Plan) on 29 May 2019 that was accepted by Council on 14 August 2019 and recorded as Plan Change 14 (PC14).
- 6.6 The purpose of PC14 was to enable rural lifestyle development on approx. 142 ha of land at Shannon Farm, Ripponvale Road, Cromwell and address demand for rural lifestyle living near Cromwell. The output of PC14 was a Structure Plan to guide subdivision and development.
- 6.7 The Structure Plan was central to managing landscape integration, visual effects, and rural character. Landscape architects played a key role in:
- Identifying no-build areas and view corridors.
 - Recommending planting buffers and building platform controls.
 - Ensuring development responds to the Pisa Range backdrop and existing rural character.
- 6.8 The panel found that, with proposed controls, the landscape and visual effects were acceptable. Key mitigation measures included:
- Height limits, earth-tone materials, and vegetation screening.
 - Clustered development to retain openness and reduce sprawl.
- 6.9 Rural Lifestyle Areas 3, 4, and 6 were defined based on a combination of:
- Landscape Sensitivity:
 - Areas 3, 4, and 6 were considered less visually sensitive than others.
 - Located in gently sloping or lower elevation zones, allowing better integration with topography.
 - Access and Infrastructure:
 - Proximity to Ripponvale Road and internal roading made these areas more suitable for development.
 - Infrastructure feasibility (e.g., water, wastewater) was assessed positively.
 - Productive Land Use:
 - These areas had lower productive potential compared to surrounding horticultural land.
 - Avoided high-value soils and existing orchards.

7.0 Visual Effects Assessment

7.1 The Assessment identifies the visual catchment and relevant viewing audiences as follows:

- Viewpoint 1: 64 Ripponvale Road looking north-west towards the Site at a distance of 450m from Shannon Farm Subdivision and 800m from the proposal Site.
- Viewpoint 2: Entry to Shannon farm Subdivision. Looking north towards the proposal Site at a distance of (approximately) 645m from RLA 3, 730m from RLA 4, and 980m from RLA 6.
- Viewpoint 3 and 3a: 144 Ripponvale Road looking west towards the Site at a distance of 270m from Shannon Farm Subdivision (entry) and 720m from the proposal Site.
- Viewpoint 4: From the driveway of 184 Ripponvale Road looking north-west towards the Site at a distance of 400m from Shannon Farm Subdivision and approximately 1km from the proposal Site.
- Viewpoint 5: From Cromwell Racecourse driveway looking north-west towards the Site at a distance of 670m from Shannon Farm Subdivision and approximately 1.2km from the proposal Site.
- Viewpoint 5a: From Cromwell Racecourse driveway looking north-west towards the Site at a distance of 630m from Shannon Farm Subdivision and approximately 1.1km from the proposal Site.
- Viewpoint 6 From McNulty Road, SH6 intersection looking west at a distance of 1.8km from the proposal Site.
- Viewpoint 7: From 3 Ord Road looking west at a distance of 2.1km from the proposal Site.
- Viewpoint 8: From Ord Road (650m from intersection with SH6) looking west at a distance of 1.9km from the proposal Site.
- Viewpoint 9: From 422 Ripponvale Road looking north-west along Ripponvale Road at a distance of 3.5km from the proposal Site.
- Viewpoint 10: From SH6 (350m west from intersection with Sandflat Road) looking east at a distance of 3km from the proposal Site.
- Viewpoint 11: From Bannockburn Road (50m north of Panners Cove Lane) looking north-east at a distance of 4km east from the proposal Site.
- Viewpoint 12: From the intersection of Bannockburn Road and Hall Road, looking north at a distance of 6.5km from the proposal Site.
- Viewpoint 13: From Start of Bannockburn Sluicing Track, on Felton Road looking north-east at a distance of 5.4km from the proposal Site.
- Viewpoint 14: From the driveway of 264 Felton Road looking east at a distance of 5.2km from the proposal Site.
- Viewpoint 15: From The Bruce Jackson Lookout on SH8 looking west at a distance of 4.1km from the proposal Site.

7.2 ~~I agree with the viewpoints and that they~~
~~The applicant has assessed visibility from a~~
~~provide a~~ suite of roadside and local vantage points around the Cromwell Basin, largely along Ripponvale Road, SH6, Ord Road, Bannockburn Road, Felton Road, and SH8. This grid of viewpoints broadly captures the Basin floor audiences and travellers along key transport corridors. ~~However, while the receiving environment is~~

~~said to include Cromwell township, there are no direct township viewpoints presented in the RMM set, such as public reserves, lakeside promenades, or commonly accessed streets with elevated or open aspects across the Basin, despite the applicant's own definition of the receiving environment extending to Cromwell town and south to Bannockburn. I agree with most selected vantage points, but I consider representative Cromwell township perspectives to be missing; these have been added into my peer review to ensure the visual catchment is fully represented.~~

- 7.3 The applicant correctly frames a consented baseline (RC220396), noting that Shannon Farm is under construction and that PC14 established RRA 5 with Structure/Schedule controls (Schedules 19.23–19.25). Under that consent, the GA and Assessment position intensified lots within RLA 3, 4, and 6, with RLA 6 entirely within the Significant Amenity Landscape (SAL) overlay and expressly subject to policy 4.4.18(n) tests to maintain open, legible character, avoid subdivision/building in the No Build Area, and limit conspicuous domestication outside it.

Visual Effects Assessment

Viewpoints 1–2 (Ripponvale Road, subdivision entry; 640–980 m)

- 7.4 I agree that RLA 3 and 4 intensification is largely internalised and filtered by RLPA planting, existing shelterbelts, street trees and consented dwellings and that adverse visual effects are none to very low.
- 7.5 For RLA 6, while the applicant characterises visibility as “moderate” and effects as low to low-moderate, I consider the perceptual shift of the development edge along the uphill side of Road 001 to be more perceptible than stated, particularly at VP2, where future rooflines and curtilage activity (albeit controlled) will punctuate the lower SAL slopes.
- 7.6 This reads as a departure from the intended open buffer below the No Build band, and the banding effect (dwellings tracking the road) is likely to be legible in leaf-off months. I consider low–moderate adverse effects to be more accurate here.

Viewpoints 3–5a (Ripponvale Road addresses, Cromwell Racecourse; 700 m–1.2 km)

- 7.7 Screening from amenity/shelter vegetation means RLA 3 and 4 effects are very low. For RLA 6, up to five to eight dwellings may be intermittently visible, particularly from the Racecourse access (VP5/5a). The composition along the slope toe does reduce skyline break, but it still moves domestic form into the SAL foreground of the ONL backdrop. I agree with a low–moderate band of effects, noting increased visibility in winter and from open sightlines across the racecourse

Viewpoint 6 (McNulty Road/SH6; ~1.8 km)

- 7.8 At this distance, RLA 3 and 4 effects will be very low. RLA 6 will read as a narrow band but distinctly elevates the development edge. The applicant's low rating is reasonable, yet when measured against policy 4.4.18(n)(iii–iv) (maintain open/natural character; avoid delineation through fencing/planting), the presence of 17 lots clustered along the consented road is contrary to the careful balancing exercise

embedded in the Structure Plan. In policy terms, I consider visual effects to be low adverse, but with a material policy inconsistency.

Viewpoints 7–10 (Ord Road, SH6 corridor; 1.9–3.0 km)

- 7.9 I accept no–very low effects for RLA 3 and 4. For RLA 6, visibility is fleeting (traffic speed, foreground screening), but the cumulative signal of expanding rural living into the SAL toe remains discernible, especially from Ord Road where long oblique views reveal the banding of platforms. I agree with low adverse effects, again noting the policy tension with SAL intent.

Viewpoints 11–15 (Bannockburn Road, Felton Road, SH8; 4–6.5 km)

- 7.10 At these distances, effects from RLA 3 and 4 are very low or none. For RLA 6, the applicant's low to very low assessment is generally appropriate. The key issue here is less visual magnitude than strategic legibility: even a fine ribbon of new dwellings on the lower SAL slopes subtly repositions the perceived rural-urban interface, which the Structure Plan sought to hold down on the flats/terraces. On balance, very low–low adverse effects are acceptable, but they compound nearer-field effects.

Township Viewpoints (Added in peer review)

~~From commonly accessed Cromwell township vantage points e.g., The Mall/Lake Dunstan Promenade, Anderson Park sports fields, and Barry Avenue lakefront sections, long views to the Pisa Range ONL and eastern Basin frame the town's everyday amenity. In clear conditions, the lower SAL toe is legible as part of the open foothill foreground. While RLA 3 and 4 intensification will be imperceptible, RLA 6 would register as a discernible extension of domestic form above the flats, akin to a thin stipple of rooflines that reads as encroachment into the foothill apron. These are low adverse effects at township scale, but strategically significant because they erode the intended contrast between domesticated flats and open foothills that underpins the Structure Plan's landscape logic~~

Visual Effects Summary

- [7.427.11](#) RLA 3: Visual effects are none–very low. Intensification is absorbed by consented pattern, internal to Shannon Farm, filtered by RLPA landscape framework and topography. Consistent with Structure Plan intent for smaller lots in the less visually prominent core.
- [7.437.12](#) RLA 4: Visual effects are none–very low. The proposed lots sit behind/adjacent to consented fabric; external visibility is limited. While portions touch the SAL boundary, they do not move the development edge perceptibly upslope. Generally consistent with the Structure Plan's balancing of densities.
- [7.447.13](#) RLA 6: Visual effects are low to low–moderate across near-field viewpoints (VP2, VP5/5a) and low at mid-field (VP6–8) with very low–low at long-field (VP11–15). ~~Low adverse effects are notable at township scale as the introduced lots erode the intended contrast between domesticated flats and open foothills that underpins the Structure Plan's landscape logic.~~ Extending 17 lots onto the lower SAL slopes outside the "Area for Future Building Platform" shifts the perceived development edge and undermines the intent to maintain open, legible character and avoid subdivision/building on prominent foothill faces except where strictly justified.

8.0 Landscape Effects Assessment

8.1 The assessment of landscape effects is consistent with the methodology outlined in Te Tangi a te Manu (TTatM) however we reach a different conclusion on the appropriateness of intensification, particularly in Rural Lifestyle Area 6 (RLA6), when assessed against the Structure Plan for Rural Resource Area 5 and the policy intent of Plan Change 14 (PC14).

8.2 In RLA3 and RLA4, I accept that the additional lots are largely internalised within the consented Shannon Farm footprint and that visual absorption is aided by the Rural Lifestyle Production Area and RLA1 foreground, street trees and landform, which together make the incremental change difficult to perceive from key public receptors.

Effects on Outstanding Natural Landscape — Pisa Range

8.3 I agree with RMM that there is no direct overlap with the ONL and that no development is proposed within the mapped ONL or the designated No-Build zones; therefore, ONL effects are negligible in plan terms.

8.4 However, in Te Tangi a te Manu terms, a proper ONL check also considers whether a change in settlement pattern on adjacent slopes could indirectly diminish the legibility of the ONL/basin relationship at the Cromwell scale.

8.5 The proposed RLA6 band would sit below the ONL and outside the No-Build overlay, yet it introduces a continuous domestic edge on the SAL foothills. While this does not intrude into the ONL itself, it does risk weakening the perceived transition from the domesticated basin floor to the open foothills that visually lead into the ONL backdrop.

8.6 That transition was purposefully calibrated through PC14's Structure Plan (small lots in the core; larger, sparser lots and explicit no-build on sensitive slopes), and changing the edge condition can indirectly affect ONL appreciation even with ONL setbacks intact.

8.7 In short, no direct ONL effect is likely, but indirect perceptual effects that erode the reading of the ONL–SAL–basin sequence are a concern if the RLA6 band proceeds.

Effects on Significant Amenity Landscape (SAL)

8.8 I partly agree with RMM for RLA3 and RLA4 but disagree on RLA6. For RLA3/4, the additional lots are largely internalised within the consented pattern and are visually filtered by RLPA/RLA1 foreground and landform, so visibility-based effects are indeed low in most public views.

8.9 However, the Structure Plan's balancing exercise did not rely on screening alone, the graduated density at the SAL interface (larger lots at edges) was the core mechanism for maintaining openness and legibility of foothill slopes.

8.10 For RLA6, the applicant's "low–moderate" conclusion understates the effect on SAL legibility and openness. PC14 and Policy 4.4.18(n) were explicit that development in RLA6 must maintain open and natural character by avoiding subdivision in the No-Build Area and applying a very limited "Area for Future Building Platform" elsewhere. Subdivision outside the No-Build area is only contemplated via strict gateways (necessity for rural activity/ecological restoration in perpetuity, or pre-approved dwellings on each lot) and must avoid adverse effects, maintain legibility, and avoid boundary delineation.

- 8.11 The proposed continuous band of 17 building platforms on SAL slopes forms a domestic edge that is discernible at 1–3 km viewing distances and, when considered cumulatively with platform earthworks and access formation, reduces perceived openness and legibility of the foothills. Te Tangi a te Manu requires assessing implications for landscape values (openness, legibility, coherence), not simply whether views are fleeting or partly screened. On that values test, the pattern change in RLA6 produces more-than-minor effects and is contrary to the Structure Plan intent and Policy 4.4.18(n). In my view, this component should be declined on SAL grounds.

Landscape Effects on Landscape Character and Quality of Ripponvale Area

- 8.12 Locally along Ripponvale Road, the proposal does not alter the RLPA frontage and amenity edges, so near-road character effects remain very low and views toward the Pisa ONL are retained.
- 8.13 However, Cromwell Basin landscape character is defined by the readable relationship between domesticated flats and open foothill SAL. The proposed RLA6 band weakens this relationship by introducing a continuous domestic line across the SAL face, thus diminishing the legible transition the Structure Plan used to protect amenity at the basin scale.
- 8.14 Accordingly, while adjacent-to-Ripponvale character remains largely intact, the wider basin character experiences a material reduction in openness/legibility due to the RLA6 pattern change.

Landscape Effects Conclusion

- 8.15 In conclusion, I accept that the ONL is protected and that RLA3/4 intensification absorbed however in contrast, RLA6 fails the PC14/Structure Plan intent and Policy 4.4.18(n) gateways and produces more-than-minor effects on the openness, legibility and coherence of the SAL despite proposed mitigations. The proposal should therefore be declined on landscape/policy grounds.

9.0 Assessment Against the Relevant Policy Provisions

- 9.1 The Shannon Farm Site is located within the Rural Resource Area 5 (RRA5) under the Central Otago District Plan (CODP), as amended by Plan Change 14 (PC14). This plan change introduced a comprehensive Structure Plan (Schedule 19.23) and associated circulation and planting schedules to manage rural lifestyle development in a way that integrates productive land use, rural living, and open space while safeguarding landscape and amenity values.
- 9.2 The site is also subject to a Significant Amenity Landscape (SAL) overlay, which signals heightened sensitivity to changes in openness, legibility, and rural character. Subdivision within RRA5 must generally accord with the Structure Plan, adhere to minimum and average allotment sizes for each Rural Lifestyle Area, and avoid development within designated No-Build zones. Breaches of these standards, or subdivision exceeding 160 lots, trigger non-complying activity status under Rules 4.7.2 and 4.7.5.

- 9.3 Key objectives and policies relevant to this proposal include:
- Objective 4.3.3 (Landscape and Amenity Values)
 - Objective 4.3.10 (Rural Resource Area 5)
 - Policy 4.4.18 (Integrated Rural Lifestyle Subdivision and Development)
- 9.4 These objectives and policies collectively require maintaining the open and natural character of the hills and ranges, protecting SAL values, and ensuring subdivision design respects the calibrated density framework established by PC14.
- 9.5 Additional provisions in Section 16 (Subdivision), particularly Objective 16.3.4 and Policy 16.4.7, address amenity values, connectivity, and minimisation of earthworks.
- 9.6 These statutory requirements form the benchmark against which the proposal's alignment with the CODP and its landscape effects must be assessed.

Assessment Against the Relevant Objectives from Section 4 – Rural Resource Area of the CODP

- 9.7 The RMM report has addressed several objectives, including those relating to ONL protection (Objective 4.3.2), landscape and amenity values (Objective 4.3.3), recreation resources (Objective 4.3.4), and integrated mixed-use development (Objective 4.3.9).
- 9.8 Their responses correctly note that the proposal does not affect ONL areas or the designated No-Build zones and that the recreational network remains intact. However, the Assessment does not fully grapple with the intent of Objective 4.3.10, which requires development to maintain SAL values and manage potential effects on surrounding rural uses.
- 9.9 The RMM response focuses on mitigation (platform caps, planting rules) but does not confront the fact that the proposal breaches minimum lot sizes and introduces a pattern that erodes SAL legibility. The Assessment fails to demonstrate how this outcome can still satisfy the objective's intent. In my view, the RLA6 component is fundamentally inconsistent with this objective.
- 9.10 The RMM report claims the proposal integrates rural living with productive uses and open space. While the RLPA and horticultural areas remain unchanged, the Assessment does not address whether the intensification in RLA6 undermines the integrated pattern envisaged by the Structure Plan. The Structure Plan anticipated a graduated density and open space buffer at sensitive edges; replacing this with a continuous domestic band is inconsistent with the integrated design intent.
- 9.11 The applicant also omits a robust discussion on Objective 4.3.3's requirement to maintain the open natural character of hills and ranges; their response focuses on mitigation measures but does not acknowledge that the pattern change itself may compromise legibility at the basin scale.
- 9.12 The applicant asserts that rural amenity values will be maintained through clustering and design controls. While this is partly true for RLA3 and RLA4 (internalised lots, low visibility), the proposal breaches the density framework that PC14 established to protect SAL openness. Smaller lots at the SAL interface and the 17-lot band in RLA6 compromise the open natural character of foothills and introduce a semi-urban pattern inconsistent with this objective. The RMM Assessment underplays these cumulative effects and does not acknowledge that maintaining openness is a policy cornerstone, not just a matter of screening.

- 9.13 The introduction of a dense band of lots in RLA6 could weaken the visual transition between the domesticated basin floor and the open foothills that frame the ONL. While mitigation measures (height limits, planting controls) help, the cumulative pattern change still risks diminishing the ONL's legibility at the Cromwell Basin scale.

Assessment Against the Relevant Policies from Section 4 – Rural Resource Area of the CODP

- 9.14 The report references Policy 4.4.18 as the most relevant and provides a detailed response to its subclauses, including adherence to the Structure Plan, allotment size standards, and maintenance of RLA6 openness.
- 9.15 This is the most critical policy for the proposal. The applicant acknowledges breaches of minimum lot sizes and the single-lot expectation for RLA6 but frames them as acceptable without addressing how and why it is acceptable. The RMM Assessment also fails to demonstrate how the proposal can still be considered "in general accordance" with the Structure Plan when it fundamentally alters the calibrated density pattern and SAL edge protection.
- 9.16 The applicant briefly mentions ONL protection but does not provide a substantive analysis under this policy. While the proposal avoids ONL and No-Build zones, the Assessment should have addressed indirect perceptual impacts on ONL legibility caused by the proposed RLA6 band. This omission is significant because Policy 4.4.1 seeks to protect ONL values from inappropriate subdivision, including cumulative effects on openness and natural character.
- 9.17 The applicant states that amenity values will be maintained through clustering and design controls. However, this response underestimates the pattern change introduced by smaller lots at the SAL interface and the 17-lot band in RLA6. Policy 4.4.2 requires avoiding or mitigating adverse effects on open space and natural character, yet the Assessment does not acknowledge that breaches of minimum lot sizes and the erosion of SAL openness represent more than minor effects on these values.
- 9.18 Similarly, Policy 4.4.10 (Rural Subdivision and Development) is mentioned, but the discussion is superficial and does not consider whether the increased density undermines the structured balance of lot sizes that PC14 intended to maintain openness at the SAL interface.
- 9.19 The applicant claims the proposal avoids sprawl by intensifying within existing development areas. While this is true for RLA3 and RLA4, the RLA6 component contradicts the policy intent by introducing a concentrated domestic edge on sensitive SAL slopes. The RMM Assessment does not critically evaluate whether this outcome is consistent with maintaining rural character and avoiding adverse effects on prominent foothills.

Assessment Against Section 16 – Subdivision Objectives and Policies

- 9.20 The applicant briefly addresses Objective 16.3.4 (Amenity Values) and Objective 16.3.10 (Provision for Future Development), noting that most of Shannon Farm remains unchanged and that the design facilitates connectivity and open space. While these points are valid, the Assessment does not fully consider Policy 16.4.7's directive

to minimise earthworks and maintain heritage values. Given the earthworks volumes and platform formation in RLA6, this omission is significant. The report also does not evaluate whether the subdivision pattern in RLA6, contrary to the Structure Plan, can be considered “appropriate and co-ordinated” under Objective 16.3.10

- 9.21 The applicant states that most of Shannon Farm remains unchanged and that amenity values, ONL protection, and open space networks are maintained. While this is accurate for RLA3 and RLA4, the RMM Assessment underplays the encroachment into SAL by the RLA6 band. Objective 16.3.4 seeks to ensure amenity values created by open space and natural character are not adversely affected by subdivision. The proposed 17-lot pattern in RLA6 introduces a domestic edge on sensitive foothills, which is inconsistent with maintaining openness and legibility. The applicant acknowledges a “low–moderate” effect but does not critically evaluate whether this meets the objective’s intent to avoid adverse effects on significant landscape values.
- 9.22 The applicant claims the design facilitates an appropriate and coordinated pattern of development. While internal connectivity and open space links are retained, the proposal breaches the Structure Plan’s calibrated density framework and introduces a subdivision pattern in RLA6 that was never contemplated under PC14. This raises questions about whether the design is truly “appropriate and coordinated” in the context of the district plan’s strategic intent. The Assessment does not address this inconsistency.
- 9.23 The applicant asserts that the design provides safe access, efficient servicing, and connectivity. These aspects appear satisfactory for RLA3 and RLA4. However, the policy also requires minimising earthworks and having regard to natural landform. The earthworks study shows significant cut and fill volumes for RLA6 platforms, which contradicts the policy’s directive to keep earthworks to a minimum. The RMM Assessment does not acknowledge this issue or propose mitigation beyond standard revegetation. Additionally, the policy seeks retention of heritage values; while the historic water race is noted, the report does not confirm how it will be protected during construction.

10.0 Conclusion

- 10.1 The proposal seeks resource consent to increase the density of residential lots within Rural Lifestyle Areas 3, 4, and 6 at Shannon Farm, located within Rural Resource Area 5.
- 10.2 All 17 lots in RLA6, six additional (11 total) residential allotments within RLA 4 and two additional (four total) residential allotments proposed within RLA 3 are within the SAL overlay. The RLA3 allotments are on the boundary of the SAL and therefore only part of the lots is covered by the SAL. No development is proposed within the Outstanding Natural Landscape or designated No Build zones.
- 10.3 Following a comprehensive peer review of the RMM Landscape Assessment, I acknowledge that the methodology applied is consistent with Te Tangi a te Manu guidelines and that the description of the receiving environment is thorough. The assessment correctly identifies the Cromwell Basin’s physical, perceptual, and associative values and provides a structured analysis of visual and landscape effects.

- 10.4 For RLA 3 and 4, I agree with RMM's findings that the proposed additional lots are internalised within the consented Shannon Farm footprint, visually absorbed by existing landform and planting, and result in no to very low adverse effects. These changes align with the Structure Plan's intent to concentrate smaller lots in the less visually prominent core of the development.
- 10.5 However, I strongly disagree with RMM's conclusion regarding RLA 6. While RMM characterises the effects as "no more than minor," this significantly understates the policy and landscape implications. The proposed 17-lot band on the lower slopes of the SAL introduces a continuous domestic edge that fundamentally alters the density framework established by Plan Change 14 and the Structure Plan. This framework was designed to maintain openness and legibility of foothill slopes through graduated density and explicit protection of sensitive areas. By clustering 17 lots along the uphill side of Road 001, the proposal creates a perceptible development edge that erodes the intended visual transition between the domesticated basin floor and the open foothills leading to the Pisa Range ONL.
- 10.6 From a policy perspective, the proposal fails the critical gateway tests under Policy 4.4.18(n). Subdivision is only contemplated where it demonstrably maintains the open and natural character of RLA6 and avoids delineation of boundaries. The proposed pattern does neither. Instead, it introduces cumulative domestication, earthworks, curtilage activity, and building platforms, that compromises SAL values of openness, coherence, and legibility. These effects are not mitigated by planting or design controls, screening does not substitute for spatial openness, which is a core landscape value under Te Tangi a te Manu. Furthermore, the perceptual shift is evident in near-field views (Ripponvale Road, Cromwell Racecourse) ~~and strategic long views from Cromwell township~~, where the foothill apron reads as a continuous band of development rather than an open buffer. This change is contrary to the Structure Plan's balancing exercise and undermines the integrity of the rural-urban interface at the Cromwell Basin scale.
- 10.7 The proposal compromises the legibility of the SAL, diminishes the perceived transition to the ONL backdrop, and breaches the calibrated density framework that underpins Rural Resource Area 5. These outcomes cannot be reconciled with the objectives and policies of the Central Otago District Plan, particularly those requiring maintenance of open natural character and avoidance of conspicuous domestication on sensitive slopes.

Suggested Conditions (if consent is granted)

RLA 3 and 4

- Maximum building height: 7.5 m in RLA3 and RLA4 (or lower if otherwise controlled by CODP or design guidelines).
- External Appearance
 - a) Roof LRV $\leq$ 10%; wall/cladding LRV $\leq$ 25%.
 - b) Matte/non-gloss finishes; no mirrored or highly reflective materials.
 - c) Colour palette: recessive, dark earth tones consistent with Central Otago vernacular.
- Building platforms $\leq$ 1,000 m² per lot.

- All curtilage activities (hardstand, lawns, gardens, outdoor living, pools, courts) must be contained within the identified platform.
- No curtilage or formal landscape structures outside the platform except driveways.
- Fencing
 - a) Internal/rear boundaries: post-and-wire only (max. 1.2 m height).
 - b) Prohibited: solid, close-board, colorsteel, white picket, hedged boundary fencing.
 - c) Road frontages: rural post-and-wire or post-and-rail; no high, urban forms.
- Planting must comply with Schedule 19.25 and the Shannon Farm Design Guidelines.