LANDSCAPE ARCHITECTURE PEER REVIEW

APPLICATION REFERENCE: 101.2025.119.1 AND 102.2025.119.1

Prepared for Timaru District Council, Att Patrick O'Toole

1 December 2025

Applicant: Yedo Investments Limited

Application: To create a 25-lot subdivision and vest in Council a new road and

local purpose reserve.

Location: 44 Gresham Street, Geraldine

Zoning: ODP: Rural Lifestyle Sub Zone

Activity Status: Discretionary





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Bibliographic reference for citation:

Boffa Miskell Limited 2025. *Landscape Architecture Peer Review: Application Reference:* 101.2025.119.1 and 102.2025.119.1. Report prepared by Boffa Miskell Limited for Timaru District Council.

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Status: FINAL	Revision / version: 2 Issue date: 1 December 2025

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1.0 Introduction

- 1.1 Boffa Miskell Limited (**BML**) have been engaged by Timaru District Council (**TDC**) to undertake a Peer Review of the Landscape Assessment that accompanied the Perspective Planning resource consent application to undertake a 25-lot subdivision and vest in Council a new road and local purpose reserve at 44 Gresham Street Geraldine (101.2025.119.1 and 102.2025.119.1). The Site is located in the Rural Lifestyle Sub Zone and located within 'Light Sensitive Area' and 'Visual Amenity Landscape' overlays.
- 1.2 A Supplementary Landscape and Visual Effects Assessment, dated September 2025, has been prepared by Glasson Huxtable Landscape Architects (GHLA) to support the application. This forms Appendix 6 of the application. Graphic attachments to support the assessment have also been provided:
 - Appendix 3 Landscape Plan prepared by Innate Landscape Architecture.
- 1.3 The purpose of this peer review is to assess the landscape effects of the proposal, verify the findings outlined in the Landscape Assessment in relation to the assessment matters of the District Plan, including the permitted baseline for the Site, and identify any issues for consideration or key issues missed.
- 1.4 This peer review has entailed both a desktop review and site investigations as summarised below.

Desktop Review

- 1.5 A review of the landscape planning and legislative framework polices and guidelines relevant to visual and landscape effects was undertaken.
- 1.6 A review of the **GHLA** report and findings as submitted as part of the application was undertaken, including:
 - Methodology used.
 - Identification of viewing audiences and selection of photograph viewpoints.
 - Landscape context and site description and analysis.
 - Landscape effects assessment in relation to the relevant statutory assessment matters.
 - Feasibility and effectiveness of any proposed mitigation.

Site Investigations

1.7 Following the initial desktop review, I, **(Hannah Wilson, BML Landscape Architect)** conducted a site visit on the 8 October 2025 and undertook the following assessments:

- Review of the existing landscape character of the site and wider landscape context.
- Review of potential visibility of the proposal from the surrounding landscape including viewpoints identified in the GHLA report.
- An on-site investigation of any potentially impacted areas highlighted from the desk top review.

2.0 Summary of Proposal

- 2.1 A detailed description of the proposal is outlined within Section 4 of the GHLA report. The applicant is seeking to establish a 25-lot subdivision on a 21.76ha Site to the west of Geraldine township within the Geraldine Downs Visual Amenity Landscape. This is an increase from the permitted two-lots which can currently be constructed within the Site. Lot sizes will range from 5,013m² to 10,394m² (excluding what will be referred to as Lot 1 which contains the existing house at 43,890m²). It is noted the recommendations outlined within Section 9 of the GHLA Assessment also form part of the proposal as confirmed within the RFI response dated 07 November 2025.
- 2.2 Access to the new lots will be provided via a new c-shaped road between Huffey Street and Gresham Street, with a single pedestrian connection to Huffey Street. The subdivision layout is designed to integrate with the existing street network while responding to the topography, with lots ranging in size and orientation. Earthworks are proposed to form the new road and access points, and low post-and-rail fencing is planned at the entrances.
- 2.3 Each lot will contain a 1,024 m² building platform with a maximum building height of 6 metres and building footprint of 350m². This includes not only the dwelling but any accessory buildings, roof overhangs and other structures. Domestic curtilage such as washing lines, patios, and similar structures will also be contained to the nominated 1,024m² building platform.
- 2.4 In addition to the proposed lots, a new Local Purpose Reserve is proposed¹. This includes the proposed stormwater retention pond to the north-east of the Site. This will be planted using native species found within the Geraldine Downs context.
- 2.5 The proposal does not include the establishment of driveways or building platforms, although these have been indicatively shown within the Concept Master Plan. It is understood should this consent be granted, the new landowner of each Lot will be responsible for their own earthworks consent.

3.0 Methodology

3.1 Section 2 and Appendix 1 of the GHLA Assessment confirmed that relevant guidance by Te Tangi a Te Manu, which provides a 7-point scale of effects from very low to very

¹ Written confirmation of this arrangement was yet to be approved at of the time of this peer review.

- high, was applied for the landscape and visual effects assessment. This scale is considered appropriate and in line with best practice. I agree that this is appropriate methodology and adopt the same scale in my peer review for comparability of the degree of effects.
- 3.2 A Graphic Supplement is also supplied. Within that Graphic Supplement are a number of plans illustrating the location of the Site, landscape context, and where photographs were taken from. Site photographs are also included, which assist to better understand the context and the proposal.
- 3.3 An additional Landscape Plan has been provided by Innate Landscape Architecture which illustrates the Concept Master Plan, street details, and proposed plant list.

4.0 Site and Landscape Context Description

- 4.1 The broader landscape context of the Site is summarised in full within Section 3 of the GHLA report. This includes a summary of the physical, perceptual, and associative attributes of the landscape. I consider the description and analysis of the landscape context, characteristics, and values to be sufficient and accurate. Additional information regarding the history of Kai Tahu in the area (associations with the Waihī River) would have assisted in understanding the broader associations with the landscape beyond Pakeha history.
- 4.2 The Site is situated on the western edge of Geraldine township, at the interface between the township and the rural landscape of Geraldine Downs. The surrounding environment is characterised by gently rolling hills, open pasture, and pockets of exotic forestry, with the Waihī River and its associated riparian corridor located to the south-east. The landscape exhibits a transition from the more intensively developed urban edge to the expansive rural downlands, with the Site itself forming part of this transitional zone.
- 4.3 The wider Geraldine Downs area is notable for its rolling and undulating landforms, which provide a distinctive backdrop to the township of Geraldine. The slopes and ridgelines are largely undeveloped, retaining a sense of openness and rural character. Vegetation patterns in the area are a mix of pasture, shelter belts, and scattered stands of exotic trees, with limited native vegetation present. Several Significant Natural Areas containing low-land forest remnants are also approximately 1.5km west of the Site. The openness of the landscape allows for broad views across the site and towards the foothills of the Southern Alps.
- 4.4 Residential development to the west of the Site within the Geraldine Downs is generally low-density, with larger lots and substantial setbacks from the road. The existing built form is typically rural-residential in character, comprising single dwellings, farm buildings, and ancillary structures. To the north and east of the Site are more densely developed residential areas forming the residential edge of Geraldine and transition between the rural and urban landscape.
- 4.5 The Site itself is currently used for pastoral farming, with open paddocks, and shelter planting. Forming the western backdrop to the township, the Site is visible from surrounding roads and properties, due to its elevated position and lack of substantial screening vegetation. The Site's location at the edge of the township means it is

subject to both urban and rural influences, making it a key area for managing development and landscape values within this transition zone.

5.0 Statutory Context

5.1 Under the Timaru Operative District Plan (ODP), the Site is located within the Rural Lifestyle Sub Zone. The purpose of the zone is outlined below:

"This zone recognises the high natural and amenity values of the Geraldine Downs and also the values and aspirations of the people that live in and use the area. The zone seeks to not only retain, but also to enhance the area's landscape character, amenity values, natural habitats and walking/cycling facilities...To achieve these aims, the zone limits new development and requires development to be managed more intensively than in other rural zones".²

- 5.2 The GHLA Assessment has outlined the key objectives and policies of relevance to this assessment in Section 5 of the report. A detailed description of the Timaru Operative District Plan (ODP) is included within Section 5.2 Figure 3 of the GHLA Assessment, and a summary of the Proposed District Plan (PDP) within Section 5.3. It is understood that the ODP has greater weight within the context of this assessment as the PDP has not taken legal effect with regard to this Site.
- 5.3 Whilst the PDP is of lesser relevance to this assessment, the GHLA Assessment has acknowledged the 'light sensitive area' and "visual amenity landscape' overlays.
- 5.4 Key matters of consideration including the following:
 - Maintain the character and qualities of the zone, including the protection of the natural character³ of the landscape. Considerations should include sympathetic design, appropriate building height, and landscaping that screens and softens built form.
 - Provide and improve open spaces and recreational areas, ensuring connectivity between natural areas and public spaces where appropriate.
 - Limit intensive development in rural zones to retain openness, visual quality, and amenity values, with careful consideration of cumulative effects.
 - Ensure new development integrates with the surrounding landscape, includes amenity planting, and manages lighting to avoid adverse visual impacts.

6.0 Landscape Effects

The proposal includes establishment of a 25-lot subdivision, access road, and new local purpose reserve within the Geraldine Downs on the residential edge west of

² Part D1 – Rural Zones. Operative Timaru District Plan.

³ Not to be conflated with natural character as used within Section 6(a) of the RMA, 1991 or within the New Zealand Coastal Policy Statement, 2010.

- Geraldine township. This will include a substantial increase in density from the two dwellings currently permitted within the Site through the underlying Rural Lifestyle Sub-Zone that allows for a minimum lot size of 10ha.
- 6.2 Section 7.2 of the GHLA Assessment discusses the "Rural Character and Capacity of the Landscape", while section 7.3 summarises "Other Landscape Matters". As outlined above, the GHLA Assessment summarises the key physical, perceptual, and associative values of the Site and its broader context which I agree with. The assessment then goes on to highlight the 'Potential Issues' within Section 6 of the report making reference to the Geraldine Downs Landscape Study⁴. This includes:
 - The change in landscape character from pastoral to large lot residential.
 - The increase in density from 2 lots to 25 lots across 21.76ha with a minimum lot size of 5.013m².
 - The short-term effect of construction associated with the subdivision infrastructure and creation of new dwellings on individual lots.
 - The change in landcover with both pastoral loss and new landscaping added.
 - The addition of a new road and footpath, fences, lighting, and entrance signage.
 - The protection of viewpoints and vistas.
 - The potential to improve the health of the existing gully environment.
 - The effects of the Project on amenity values and the quality of the environment.
 - The effects arising from subdivision including increased density, occupation, and movement.
- 6.3 The GHLA Assessment then goes on to state within Section 7.2 elements which may detract from the rural landscape character and amenity as guided by Part D, 1.2 of the ODP. These are summarised below within the GHLA Assessment as:
 - Buildings that are poorly integrated into the landform and vegetation patterns.
 - Building design that is unresponsive to the rural setting.
 - Structures or wood lots which block outward views.
 - Bold boundary demarcations which do not follow the topography.
 - Fragmentation of the rural character with the addition of urban structures.
- I agree with the summary above within the GHLA Assessment given the landscape values which are summarised within Section 3 of the report. In addition, I note that the current zoning does not anticipate development of this nature and density which been given consideration within this section of the report.
- 6.5 Within Section 7.2 of the GHLA Assessment the report acknowledges that the proposal will result in a change from rural lifestyle to large lot residential, and with the density being larger than what is currently permitted under the current zoning⁵.
- The assessment proceeds to state that whilst "...the proposed dwelling density is far greater than that contemplated by both plans, it is not out of context with some of the neighbouring residential properties...". This is further explained within the final paragraph of the section stating:

"The rural character of the landscape will be strengthened through the use of carefully coordinated planning and design to ensure a coherent and integrated subdivision. The design will respond to the landform and rural setting by considering the careful location of building platforms, having houses set back from the road, using relatively open post and wire/steel mesh front fencing, connecting

⁴ Geraldine Downs Landscape Study, July 2008, Boffa Miskell.

⁵ One dwelling per 10ha.

with existing pedestrian linkages, and implementing a large amount of new planting."

- 6.7 Given the above reasoning, the GHLA Assessment concludes that there will be a low (less than minor) adverse effect arising from the increased density of development on the rural character.
- A similar sentiment is concluded within Section 7.3 of the report, which summarises the landscape effects on the landform, and landcover. Landscape effects on the landform are considered low (less than minor) adverse. This is due to the proposed Concept Master Plan avoiding structures on ridgelines or where they will break the skyline and the overall topography with a predominantly east facing slope and general rolling landform will largely remain. Effects on landcover are considered positive due to enhanced amenity and ecological benefits.
- Overall the landscape effects summary concludes that the proposal will have a low (less than minor) adverse effect, concluding "...that the site can accommodate the subdivision, if the design and siting of the proposed dwellings on the lower hillslopes within Geraldine Downs is carefully considered in response to the environment, and in a way which mitigates or minimises effects...".
- This peer review has considered the assessment findings above in conjunction with the overarching purpose and anticipated development pattern of the Rural Lifestyle Sub Zone. While the Site has been carefully designed and will enable future development to appear as a coherent and integrated urban edge, the overall density will exceed that normally anticipated within a rural landscape. This is also acknowledged in the GHLA Assessment. In this respect, the proposal will extend the apparent urban edge of the township further into the foothills of the Geraldine Downs and will therefore change the apparent rural backdrop to the existing settlement.
- Overall, considering the permitted baseline of one dwelling per 10 ha within this zone, and the demonstrated landscape capacity to accommodate the proposal with a minimum lot size of 5,013m², I conclude that adverse landscape effects will be moderate (more than minor). This is due to the loss of the current rural character of the landscape in this part of Geraldine Downs (Rural Lifestyle Sub Zone). Effects also include a reduced sense of openness, and legibility of the landform, in addition to increased sense of domestication of an area adjacent to the current urban boundary of Geraldine. This would be perceived as urban sprawl into the rural lifestyle sub zone and would undermine the legibility of the settlement boundary.
- 6.12 Following completion and once planting within the lots and local purpose reserve is established—thereby helping to recess built form into the landscape—I consider that adverse effects will reduce to low–moderate (minor). While the proposed planting will assist in integrating the development into the landscape, timeframes for implementing the planting are likely to exceed a timeframe anticipated under temporary effects (i.e. 5 years).
- 6.13 In addition, the proposed building platform within Lot 8 breaches the boundary setback of 15 metres for the zone, located at 9.5 metres from the Site boundary. Whilst there is a boundary setback breach, effects are considered very low adverse given the adjacent dwelling is located some 250 metres from the edge of the proposed building platform.

7.0 Visual Effects

- 7.1 The GHLA Assessment identifies the visual catchment and relevant viewing audiences as follows:
 - Views from Wilson, Darby, and Huffey Streets
 - Views from Gresham Street
 - Views from the Grande Vue Golf Club
 - Views from Downs Road
 - Views from Greenvale Road
 - Views from SH79/Cox Road
 - Views from Neighbouring Dwellings (Darby Street, Huffey Street, Gresham Street, and Downs Road)
- 7.2 In addition to the above, an assessment of the following viewpoints was undertaken within the RFI response.
 - Views from Tiplady Road
 - Views from North Terrace Road
 - Views from South Terrace Road
 - Views from Cox Street/Talbot Street intersection
- 7.3 Based on the Site visit, the above viewing audiences are largely considered to represent the visual catchment. Whilst not included within the RFI, absent from the assessment are effects on properties accessed from Cox Street in proximity of North Terrace and South Terrace.
- 7.4 In summary, I broadly agree with the conclusions found within the GHLA Assessment with regard to visual effects, unless otherwise stated within the discussion below.

Public Viewpoints

7.5 Representative views from Wilson, Darby, and Huffey Streets are illustrated within the Graphic Supplement within Viewpoints 1 and 2. The assessment concludes that "...the subdivision development will read as an extension of the residential area as it moves up the flanks of the hillside behind the existing urban dwellings" changing the pastoral hillside into a large lot subdivision. The extent of built form proposed is not anticipated within the plan, however, views of the Site are primarily associated with the north-eastern corner where Lots 13 and 14 will be visible. Given the permitted development within the zone, it is considered these effects will be low adverse (minor), albeit able to be integrated into the landform through the proposed mitigation measures.

7.6 Views from Darby Street are illustrated within Viewpoint 3 and are more elevated as the road steadily climbs the hills above Geraldine. The assessment concludes "...from the lower portion of Darby Street, a clear open view of the proposed subdivision will be available from the roadside across the vacant sections at 35 and 37 Darby Street". The GHLA Assessment concludes that the level of effect will be low adverse (less than minor) due to the Residential 5 zone permitted baseline for properties accessed on Darby Street⁶. Whilst I agree with the level of effect if a dwelling was to be

⁶ Referring to the Timaru ODP this is instead the Residential 1 Zone, although the purpose of the zone still allows residential development. The zone includes the existing Residential areas of Geraldine.

- constructed on this property, partial views of the Site remain at present and would likely be low adverse (minor).
- 7.7 Views from Huffey Street and Gresham Street are illustrated within Viewpoints 4 and 5. Viewpoint 4 illustrates representative views from Huffey Street and concludes that "...the new internal road and several of the proposed dwellings will be visible above the rooflines of existing houses and up the alignment of the new road. However, views will diminish over time as the proposed boundary planting establishes, providing screening and softening of some of the built form". As partial views of the increase in built form and change in rural lifestyle character of the Site will be evident, it is considered visual effects from this viewpoint are low adverse (minor). I concur with the level of effect from Gresham Street as represented in Viewpoint 5.
- 7.8 Views from the Grande Vue Golf Club are represented by Viewpoint 6 and I agree that the level of effect will be no greater than low adverse (less than minor). From this viewpoint, Lot 1 associated with the existing dwelling and the proposed access road will be visible with the remaining lots extending further north behind Lot 1.
- 7.9 Viewpoint 7 was included within the Graphic Supplement to illustrate views from Downs Road. Upon visiting the Site, I concur that no views or adverse visual effects will be evident for road users of Downs Road.
- 7.10 Views to the Site from Greenvale Road are representative of the undulating rural landscape to the north-west of the Site. These views are transient and from high points within the downlands landscape accessed by Greenvale Road. Views of the Site are restricted to the shelter belt on the western boundary of the Site which will remain throughout construction and at completion of the subdivision. This shelter planting will be maintained long term as a condition of consent. I therefore concur with the level of effect (very low adverse) as the shelter belt will continue to curtail views into the Site.
- 7.11 Views from State Highway 79 (Cox Street) are represented within Viewpoint 9. These views will be intermittent through intervening vegetation, and are summarised as follows:
 - "...intermittent views of the site are visible at speed, amongst vegetation, fencing and structures. One such view is available just south of the entrance to Geraldine and another from outside the residence at 100 Cox Street. Slower, longer views are available to cyclists and pedestrians".
- 7.12 I agree that these views will be intermittent and transient, however conclude that effects (whilst less than minor) will be low adverse, albeit fleeting.
- 7.13 Additional public viewpoints were addressed within the RFI response. These include views from Tiplady Road, North Terrace, South Terrace and the intersection of Cox Street and Talbot Street within Geraldine Township. These are as follows:
 - Tiplady Road: Very Low adverse
 - North Terrace: Low adverse (less than minor)
 - South Terrace: Low adverse (less than minor)
 - Intersection of Cox Street and Talbot Street: Very low adverse
- 7.14 The GHLA RFI response includes the use of Google Earth to assess these viewpoints. It is acknowledged the use of Google Earth is not considered best practice to surmise the level of visual effect, and no further justification has been given regarding the level

of effect. Nevertheless, having visited these viewpoints during the Site visit, I agree with the summary of effect for the following reasons:

- Tiplady Road: Long distance transient views are available from Tiplady Road for road users. These views afford partial to glimpsed views of the Geraldine Downs, with glimpsed views available of the Site. Glimpsed views of the proposal will be evident but will not detract from the broader backdrop of the Geraldine Downs.
- North Terrace, and South Terrace afford glimpsed views of the Site forming the backdrop to the township. Views of the change in character from rural lifestyle to residential will be evident albeit glimpsed through intervening-built form.
- Views from Cox Street near the intersection of Talbot Street are framed by the street corridor and look towards the north-eastern corner of the Site and towards Lots 19-21. These views will remain, although filtered and long distance.

Private Viewpoints

7.15 With regard to visual effects from private viewpoints (dwellings) a summary table is included within the GHLA Assessment within Section 8.4 of the report. I broadly agree with the level of effect (and notification status) concluded within this table. I consider however that in addition to the houses that will be notified due to low adverse (minor) effects or above, 19 Darby Street should also be included in the limited notification. This is due to the dwelling containing an indoor and outdoor living area on the first floor of the dwelling which overlooks the Site (refer to Figure 1 below).



Figure 1: 19 Darby Street. Outdoor living area (raised deck) and adjacent living space attached overlooks the Site.

7.16 It is acknowledged that the visual effects assessment of public and private viewpoints included within the GHLA assessment has been thorough for those that have been recognised to date. A key omission however are views from private properties accessed from Cox Street. These dwellings whilst obtaining mid-range views, afford more open views of the Geraldine Downs being set back from the Site. These views

- afford an appreciation of the broader Geraldine Downs Landscape and the backdrop to the township.
- 7.17 During the Site visit the properties to the west of Cox Street and south of Huffey Street were observed from public viewpoints along the road. These dwellings are largely orientated to the north-west towards the Geraldine Downs. While I did not visit these dwellings, it was evident from public viewpoints on Gresham Street, Cox Street, North Terrace, and South Terrace that these dwellings would likely have partial to open views of the Site and the associated change in this part of the Geraldine Downs Landscape from a rural lifestyle landscape to a more domesticated hillside. Given the partial to open views of the Site and anticipated activity with the Rural Lifestyle Sub Zone, it is considered that these properties would likely experience a low-moderate visual effect, in addition to those identified within the GHLA Assessment (refer to Figure 2 and 3 below). Therefore, I recommend these properties are included in the limited notification.



Figure 2: Indication of properties which are likely to experience a low-moderate visual effect.



Figure 3: View from Gresham Street looking east towards properties accessed from Cox Street.

8.0 Recommendations

- 8.1 A list of volunteered design controls and conditions has been outlined within Section 9 of the GHLA Assessment. These have been taken into consideration within the assessment.
- 8.2 I recommend adoption of the above conditions, and in addition recommend the following to be included as condition of consent should it be granted:
 - Once earthworks are completed on Site, any soil which has been disturbed shall be hydroseeded as soon as practicable to minimise visual effects of exposed earthworks, and to stabilise the landform.
 - That proposal is implemented in accordance with the plans included in Appendix 3

 Landscape Plan. Individual landscape plans for each allotment should be prepared by a Landscape Architect and certified by TDC before building can commence.
 - Native planting is to be planted at a minimum grade of PB5, and trees which can attain a minimum height of 8 metres shall be a minimum grade of 25L. If any tree is to become damaged or die it shall be replaced within the next appropriate planting season.
 - Should any tree (existing shelter belt) on the western boundary of the Site become damaged or die it shall be replaced within the next appropriate planting season to continue to mitigate views from the west.
 - Permeable fencing should be limited to low post and rail/wire fencing, with low timber or wire entrance gates to each section where required.

9.0 Conclusion

- 9.1 The Applicant seeks resource consent to establish a 25-lot subdivision, access road, and local purpose reserve at 44 Gresham Street Geraldine. The Site will be accessed via a circular access road connecting Huffey Street in the north to Gresham Street in the south.
- 9.2 This peer review has sought to balance the overarching purpose of the Rural Lifestyle Sub Zone and the intent of the Timaru ODP objectives and policies, in conjunction with the landscape capacity of the Site to accommodate the proposal. The purpose of the zone is to recognise the character and amenity values of the Geraldine Downs and retain and enhance the landscape character, and amenity values of the area.
- 9.3 With regard to landscape effects, the proposal includes extensive mitigation measures to assist with integrating the development into the Geraldine Downs Landscape. This includes the implementation of building platforms to contain residential development and associated curtilage to areas below prominent high points within the Site, and the establishment of the local purpose reserve and planting strategies to soften built form on the backdrop to the township.
- 9.4 Considering the overarching statutory context, the proposal will include an increase from two lots to 25 lots total (with a minimum size of 5,013m², and excluding the existing dwelling) which exceeds the anticipated level of development (of 10ha lots) within the Rural Lifestyle Sub Zone of the Timaru ODP. The Site is also recognised as a visual amenity landscape due to the values it holds regarding its rural character, and openness, forming the skyline and backdrop to Geraldine.
- 9.5 Considering the permitted baseline of one dwelling per 10 ha within this zone, and the demonstrated landscape capacity to accommodate the proposal with a minimum lot size of 5,013m², I conclude that adverse landscape effects will be **moderate (more than minor)**. This is due to the exceedance of anticipated level of development within the Rural Lifestyle Sub Zone, coupled with high amenity and "natural character" values associated with the Geraldine Downs. Effects will also include a reduced sense of openness, and legibility of the landform, in addition to increased sense of domestication of an area adjacent to the current urban boundary of Geraldine. As the proposed design controls and mitigation measures are established with the zoning in mind, this will likely reduce to low-moderate (minor) adverse landscape effects, once all planting is implemented and matures. However, the proposed development would be perceived as urban sprawl into the Rural Lifestyle Sub Zone and would undermine the legibility of the settlement boundary.
- 9.6 With regard to visual effects, I broadly concur with the notification status and level of effect outlined within the GHLA Assessment. Exceptions include public views from Wilson, Darby, and Huffey Streets where consideration of the permitted baseline has been accounted for in the summary of effect (low adverse (minor)). In addition to those dwellings recognised for limited notification I recommend that 19 Darby Street is also included within the limited notification.
- 9.7 A key omission which requires consideration are mid distance views from properties accessed from Cox Street, where partial to open views of the proposal will be available. These properties afford a broader view of the Site and an appreciation of the backdrop to the Geraldine Township. It is considered from some of these properties low-moderate adverse visual effects are anticipated due to the orientation

of the dwellings, and openness of the view. Therefore, it is recommended these properties are notified as outlined within Figure 2 of this report should this consent application not be publicly notified due to moderate landscape effects.