

Qualifications and experience

- 1 My full name is Naomi Louise Crawford.
- 2 I hold the qualification of a Bachelor of Design in Landscape Architecture with Honours from Victoria University of Wellington. I am also a Registered Member of Studio Pito Ora, New Zealand Institute of Landscape Architects (**NZILA**) and a member of Te Kahui Ture Taiao, Resource Management Law Association (RMLA).
- 3 I am a Director at Glasson Huxtable Landscape Architects (**GHLA**) in Christchurch, having held this position since 2023. Previously I was a Senior Landscape Architect within the same company. In the past, I have worked within small landscape firms, a large multi-disciplinary consultancy and in the public sector.
- 4 I have practiced as a Landscape Architect for approximately 15 years. For the past eight years, I have also taught in the Landscape Architecture degree programmes at Lincoln University.
- 5 I am regularly called upon as a landscape and visual expert for complex projects involving multi-disciplinary approaches across Aotearoa. My experience spans across the full spectrum of Landscape Architecture and Landscape Planning.
- 6 For subdivision land use activity, my experience includes subdivisions near the Rakaia Gorge, and in Charteris Bay, Lake Coleridge, Fairlie, Mt Cook, Omarama, Bendigo, Bannockburn and Cape Foulwind.

My role

- 7 My role in relation to the Yedo Investments Limited (**Yedo**) application to create 24 residential allotments, alongside vesting in Council a new road and local purpose reserve (**the application**), has been to provide advice in relation to landscape and visual effects.
- 8 Since March 2024 this has included:
 - (a) Visiting the site and surrounding area on 15 April 2024.¹
 - (b) Producing the Supplementary Landscape and Visual Assessment (**LVA**) plus accompanying Graphic Supplement, September 2025 (Revision 4).
 - (c) Providing ongoing advice by attending meetings, suggesting mitigation measures, drafting conditions, and preparing supporting graphics.

¹ An additional site visit was undertaken by my business partner and Registered Landscape Architect Mark Huxtable of Glasson Huxtable on the 11 September 2025. I intend to visit the site and surrounding area again before the upcoming hearing.

- (d) Overseeing the GHLA Landscape Response to the Section 92 Request for Information (**RFI**) from Timaru District Council (**TDC**), 7 November 2025.
- (e) Overseeing the GHLA Response to the Landscape Peer Review (**Landscape Peer Review**), 28 November 2025.

Code of Conduct for Expert Witnesses

- 9 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of evidence

- 10 My evidence addresses:
- (a) The existing environment and the key landscape values.
 - (b) The key findings of the GHLA LVA, September 2025 (Revision 4).
 - (c) The statutory context.
 - (d) The key findings of the Geraldine Landscape Study and the Timaru District Landscape and Coastal Study.
 - (e) Matters covered in the GHLA RFI Response, 7 November 2025.
 - (f) Matters covered in the GHLA Peer Review Response, 28 November 2025.
 - (g) Matters raised in submissions.
 - (h) The Section 42A Report by Mr O'Toole of TDC, 31 March 2026.
 - (i) The recommended landscape mitigation and conditions of consent.

Documents considered

- 11 In preparing this statement of evidence I have considered the following documents:
- (a) The Subdivision Plan 'Engineering Design Proposed Contour Plan', PL02, Issue B, by Davis Ogilvie, August 2025.

- (b) The Landscape Concept Master Plan, typical details and planting list, Rev G, by Innate Landscape Architecture (**Innate**), 7 November 2025.²
- (c) The Timaru District Landscape and Coastal Study by Boffa Miskell for TDC, 10 June 2020.
- (d) The Section 92 RFI by Mr O'Toole of TDC, 16 October 2025.
- (e) The Landscape Peer Review by Ms Wilson of Boffa Miskell for TDC, 25 November 2025.
- (f) The Section 42A Report by Mr O'Toole of TDC, 31 March 2026.
- (g) Submissions relevant to my area of expertise.
- (h) Planning provisions relevant to my area of expertise.
- (i) The principles outlined within Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (**TtatM**), NZILA, July 2022.

Proposed activity

- 12 The applicant seeks to create 24 residential allotments, alongside vesting in Council a new road and local purpose reserve at 44 Gresham St, Geraldine (**application site**). My evidence is based upon the description of the proposal set out in the evidence of Mr Geddes (Applicant's Planner).
- 13 Key landscape aspects of the proposal include:
 - (a) Twenty-four residential allotments (ranging between 5013m² to 10,394m²) with identified building platforms (a maximum of 800m² (approx. 28 x 28m)).
 - (b) A new 'C' shaped access road connecting to Huffey and Gresham Streets.
 - (c) A new local purpose reserve to vest in TDC.
 - (d) Landscape mitigation measures as discussed in **Table 4** of this evidence.

The existing environment

- 14 **Section 3 of the LVA** identifies the relevant landscape context and outlines the associative, physical, and perceptual attributes. Understanding this is necessary in

² Of note, two landscape architecture firms have worked for the applicant. Innate Landscape Architecture (**Innate**) have completed the landscape design and Glasson Huxtable Landscape Architects (**GHLA**) have completed the landscape assessment.

order to assess the potential effects of the proposed subdivision on the identified landscape values.

- 15 The key landscape values can be summarised as:
- (a) The contrast between the established township and the open pasture on the rolling hillsides.
 - (b) The scenic value provided by the elevated outward views, including the visibility of weather patterns, sunrises and sunsets.
 - (c) The openness and 'country-feel' of the wider landscape and the peace and privacy it offers.
 - (d) Vegetation with well-defined edges, which generally follows ridgelines, gullies or property boundaries.
- 16 The site itself has a rural productive landuse, is undulating and mainly grassed. It is irregular in shape and has a frontage to an unformed portion of Huffey Street. At the southern end of Gresham Street, a deciduous tree-lined driveway provides access to a single existing residential dwelling and the wider property. In the centre of the site there is a gully accompanied by a small number of mature trees. On the western boundary there is an established hedgerow.

Assessment of effects

- 17 This section summarises the key findings of the LVA. It includes the effects of the subdivision on landscape character and values, and the ability of the landscape to absorb the changes proposed.

Rural character and the capacity of the landscape

- 18 The proposal will result in the site's character shifting from rural to a large lot residential, with allotment sizes ranging from 5013m² to 10,394m² (average being 6116m²). This is a materially higher density than contemplated by the ODP and PDP, which provide for one dwelling per 10ha (100,000m²). Despite this, the overall adverse landscape effect from the increased density is assessed as **low (minor)**.³
- 19 This is because, the site sits on the rural-residential fringe, where lot sizes transition from larger rural land holdings to smaller residential lots. This is reflected in the land patterns and the zoning, with the increased density to the north and east of the site. The proposal will be a logical transition between these two areas.

³ Noting that this has slightly increased from an adverse low (less than minor) effect to an adverse low (minor) effect during the application process.

- 20 In addition, carefully located building platforms, and well considered setbacks, open style fencing, and generous landscaping will help maintain a coherent rural lifestyle character. Plant species proposed are commonly found within the area.⁴
- 21 New planting will occur around dwellings, on low bunds between lots, at external boundaries, along the road corridor, at the subdivision entrances, and around swales. While this will help to soften and screen the dwellings and provide amenity and ecological benefits, it will also result in a change to the existing pastoral hillside.
- 22 In response, the landscaping has been carefully designed to reinforce the subdivision edge, follow the gully, and subtly define property boundaries, supporting key landscape values. It has deliberately been kept relatively organic to retain a more open, semi-rural country feel.
- 23 The site's overall topography will largely be retained, including the predominant east facing slope and general rolling landform. No structures are proposed on ridgelines or in other locations that would break the skyline.

Visual amenity

- 24 The visibility of the proposed subdivision from different viewpoints and the effect that the changes might have on the locality's landscape values has been considered throughout the application process.
- 25 Adverse visual effects are anticipated to range from **low to moderate (minor)** to **very low (less than minor)** depending on the location of the viewer. Overall, adverse visual effects are anticipated to be **low (less than minor)** and will reduce once planting is established.

Statutory context

- 26 When considering statutory provisions, the important documents in relation to landscape matters are the Resource Management Act 1991 (**RMA**), Operative Timaru District Plan (**ODP**) and Proposed Timaru District Plan (**PDP**).⁵ In essence:
- (a) The application site is located in the Geraldine Downs 'Rural 4A - Rural Lifestyle Sub Zone of the ODP. Within this zoning, subdivision is a discretionary activity.
 - (b) The ODP lists several objectives and policies to avoid, remedy or mitigate adverse environmental effects. Of relevance, the ODP encourages land use

⁴ Most of the species on Innate planting list accompanying the Landscape Concept Master Plan are from local sources, such as the New Zealand Plant Conservation Network's Talbot Forest Plant List, the Geraldine Downs Landscape Study, and the Department of Conservation Talbot Forest Scenic Reserve Plant List.

⁵ Of note the decisions version of the PDP was issued very recently on the 19 March 2026, meaning it now has legal effect.

to be sympathetic to retaining the rural landscape character and to consider the impact development will have on views from public places.

- (c) The application site is in the PDP Rural Lifestyle Zone (**RLZ**) and is within a Visual Amenity Landscape (**VAL**).
 - (d) The PDP lists objectives and policies to avoid, remedy or mitigate adverse environmental effects. Of particular relevance are RLZ-P3 (character and qualities), NFL-02 (visual amenity landscapes), NFL-P3 (maintaining and enhancing visual amenity landscapes), and SUB-P15 (subdivision in the rural lifestyle zone). An assessment against these matters has been included as **Table 5** at the conclusion of this evidence.
 - (e) Both the ODP and the PDP state that a 10-hectare density is anticipated for the site.
- 27 Overall, it is considered that **the proposal is generally consistent with the policy framework relevant to landscape matters**, apart from the intensification in development.

Geraldine Downs Landscape Study

- 28 The Geraldine Landscape Study describes the landscape character of Geraldine Downs as:

“Overall, there is a strong sense of a cohesive rural character created by the rolling landforms and open landcover that is well maintained to the point of having picturesque refinement. The Downs landscape has an intimate rural scale that is attractive in appearance... These landscape characteristics have and continue to make the Downs a pleasant and attractive place to live. It is evident that this popularity has led to substantial rural residential development of the Down’s inner landscape changing the character of this area from being primarily rural to becoming increasingly rural residential.” (underlining mine for emphasis).

- 29 I largely agree with the above description (other than the use of the word ‘picturesque’), but I note the study is now 18 years old and does not account for more recent development. It also has no statutory weighting.
- 30 For completeness, **Section 7, Figure 4 of my LVA** provides a helpful assessment of the proposal against the identified landscape values of the Geraldine Downs

Landscape Study.⁶ This has concluded that the proposal will **generally maintain the existing landscape values** as identified by the study.

Timaru District Landscape and Coastal Study

31 Whilst preparing this evidence, I located a more recent Timaru District Landscape and Coastal Study (**Timaru Landscape Study**) prepared in 2020. Of note, this document has not been referred to so far by any parties to the application, but it is of importance. This is because it reviews existing documents (such as the Geraldine Landscape Study) and also considers VALs amongst other landscape identifiers within the district.⁷

Visual Amenity Landscapes

32 Case law illustrates that VALs are commonly associated with attractive, pastoral rural landscapes, but do not reach the threshold of being identified as an ONF/L”.⁸ The Timaru Landscape Study lists the specific landscape characteristics and values of the Geraldine Downs VAL. The values can be summarised as:⁹

(a) *“The openness and cohesive repetition of well-maintained rolling hills of pasture, patches of vegetation following the undulating topography and views of surrounding plains...”*

(b) *“The transient landscape values such as the sunrises and sunsets, views of weather patterns, the presence and sightings of wildlife...”*

33 Many of the other values listed (such as cliff faces, the nationally significant Talbot forest, long-tailed bats and QEII covenants) are less applicable to this proposal. The mapped VAL area is illustrated on page 10 of the attached **Graphic Annexure** and illustrates that **the site is located on the eastern edge of the VAL area and will include a small portion of the overall area.**

Modification and settlement

34 In regard to modification and settlement, the study notes for Geraldine Downs that:

(a) *“Rural settlement has occurred along some of the roads throughout the area. The attractiveness for living reflects its high amenity value and distinguishes*

⁶ The landscape values which underpinned the Geraldine Downs Landscape Study have been recognised in the Environment Court (Pigeon Bay decision) as appropriate criteria for assessing outstanding natural features and landscapes. As such, they are the values that likely contribute to people’s appreciation of the landscape.

⁷ The Timaru District Landscape and Coastal Study is a full assessment of Timaru’s landscapes for the Proposed Timaru District Plan.

⁸ Outstanding Natural Feature or Outstanding Natural Landscape.

⁹ Timaru District Landscape and Coastal Study, Page 75

it from other rural areas that are predominantly used for agricultural production.”

- (b) *“...Modifications within this VAL include the rural lifestyle blocks, associated dwellings, roads and structures that have led to a relatively high level of residential development in the area.”*
- (c) *“Residential dwellings are a prominent part of the Geraldine Downs landscape today.”¹⁰*

35 It is certainly clear that **residential dwellings are commonplace throughout the VAL**, as observed in literature and when visiting the local area. Although the proposed subdivision will change the site from open to more enclosed, there will also be positive benefits such as the amenity gained from further mixed planting and the addition of a new pedestrian footpath. The larger lots, fencing style, allocated building platforms, and proposed planting will also support a rural to residential transition.

Section 92 RFI response

- 36 A section 92 RFI response was provided to TDC on the 7 November 2025 in regard to landscape matters. This addressed additional viewpoints, the rationale for effects on particular properties, details for the building platforms, recommendations for mitigation, cumulative effects, and the subdivision entrance signage.
- 37 The response was accompanied by a comprehensive table (revised 20 October 2025) which outlined in detail the current and predicted view (visual effects) for all residents who were considered to be potentially affected by the proposal.

Landscape peer review

- 38 A landscape peer review was provided on the 25 November 2025 by Ms Wilson of Boffa Miskell on behalf of TDC. It focused on the landscape effects of the proposal on the broader area and the visual effects on the properties along Cox Street.
- 39 Overall, I consider myself and Ms Wilson are well aligned, with a few exceptions. **Tables 1, 2 and 3 below** outline these similarities and differences. Both experts have relied upon the ‘7-point scale of effects’ from TTatM to measure effects.¹¹

Landscape effects

- 40 In regard to the magnitude of landscape effects generated by the proposal, the peer review concurred with the landscape methodology adopted and the

¹⁰ Timaru District Landscape and Coastal Study, Page 31.

¹¹ Refer to pages 140 and 151 of Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines which covers this in more detail.

identification of landscape values but reached a different conclusion as to the magnitude of effects on landscape character. This difference is illustrated below:

Table 1: Summary of landscape effects

Landscape effects	GHLA: Nature and level of effects:	Boffa Miskell: Nature and level of
Effects on landscape character with the change from rural to rural lifestyle, increased density and loss of openness	Adverse low (Minor)	Adverse moderate (More than minor)

41 Despite these differences, both landscape experts concur that the proposal will result in a noticeable increase in density, some loss of rural openness and the extension of the urban edge to the west. Mitigation measures such as planting, bunding, and design controls will support integration over time; however, whilst landscaping establishes, effects will be elevated in the short term. Once amenity and screening planting is established, effects will reduce.

Visual effects

42 **Tables 2 and 3** compare the magnitude of visual effects for public and private viewpoints. Differences are highlighted in **bold** and submitters are highlighted by an **asterix***. Where references to viewpoints are provided, these correlate with the panoramic images in the **Graphic Supplement** appended to the LVA.

Table 2: Summary of visual effects - Public viewpoints

Public viewpoints	GHLA: Nature and level of effects	Boffa Miskell: Nature and level of effects
From Wilson, Darby and Huffey Streets (Viewpoints 1 and 2)	Adverse low (Less than minor)	Adverse low (Minor)
From Darby Street (Viewpoint 3)	Adverse low (Less than minor)	Adverse low (Minor)
From Huffey Street and Gresham Street (Viewpoints 4 and 5)	Adverse low (Less than minor) VP4 Adverse very low (Less than minor) VP5	Agrees
From the Grande Vue Golf Club (Viewpoint 6)	Adverse Low (Less than minor)	Agrees
From Downs Road (Viewpoint 7)	No adverse effect	Agrees
From Greenvale Road (Viewpoint 8)	Adverse very low (Less than minor)	Agrees
From SH79/Cox Road (Viewpoint 9)	Adverse very low (Less than minor)	Adverse low (Less than minor)
Wider views from Tiplady Road, North Terrace Road, South Terrace Road, and the Cox Street/Talbot Street intersection	Adverse very low to low (Less than minor)	Agrees

43 The above table illustrates general alignment between myself and Ms Wilson with a few small differences with no more than a single step between us.

Table 3: Summary of visual effects - Private viewpoints

Neighbouring residents	GHLA: Nature and level of effects: Years 1 - 2	GHLA: Nature and level of effects: Year 5	Boffa Miskell: Nature and level of effects	Difference
Huffey Street				
1* Huffey Street	Adverse low to moderate (Minor)	Adverse low (Minor)	Agrees	
Gresham Street				
22, 30* and 32 Gresham Street	Adverse very low (Less than minor)	Adverse very low (Less than minor)	Adverse low to moderate (Minor)	2 step difference
34 and 36 Gresham Street	Adverse low (Less than minor)	Adverse very low (Less than minor)	Agrees	
40 Gresham Street	Adverse low to moderate (Minor)	Adverse low (Minor)	Adverse very low (Less than minor)	Boffa Miskell suggests there is less of an effect
6A, 6B*, 8 and 18 Gresham Street	Adverse low (Minor)	Adverse low (Minor)	Adverse very low (Less than minor)	Boffa Miskell suggests there is less of an effect
2*, 4 and 6 Gresham Street	Adverse low to moderate (Minor)	Adverse low (Minor)	Adverse low (Less than minor)	Boffa Miskell suggests there is less of an effect
Darby Street				
39, 35 and 37 Darby Street	Adverse low to moderate (Minor)	Adverse low (Minor)	Agrees	
19* to 33 Darby Street (Southern side of Darby Street)	Adverse low (Less than minor)	Adverse low (Less than minor)	Agrees except for 19 Darby Street where effects would be Adverse low (Minor)	1 step difference for one property
1, 5 and 13 Darby Street (Southern side of Darby Street)	Adverse very low (Less than minor)	Adverse very low (Less than minor)	Agrees	
11 Darby Street	Adverse low (Less than minor)	Adverse low (Less than minor)	Agrees	
Downs Road				
3 Downs Road (Southern side of Downs Road)	Adverse low to moderate (Minor)	Adverse low (Minor)	Agrees	
9 to 19 Downs Road (17* is a submitter)	Adverse low to moderate (Minor)	Adverse low to moderate (Minor)	Agrees	
21 Downs Road	Adverse very low (Less than minor)	Adverse very low (Less than minor)	Agrees	
31 Downs Road	Adverse low (Minor)	Adverse very low (Less than minor)	Agrees	
45 Downs Road	No adverse effect	No adverse effect	Agrees	
Cox Street				
Properties to the west of Cox Street and south of Huffey Street (100* is a submitter)	Adverse low (Minor)	Adverse low (Less than minor)	Adverse low to moderate (Minor)	Both 'minor' but at opposite ends of the scale
Further Afield				
Properties further afield: Tiplady Road, South Terrace Road and the Cox/Talbot Street intersection	Adverse very low to low (Less than minor)	Adverse very low to low (Less than minor)	Agrees	

44 The above table illustrates that the biggest difference in effects ratings is for the residents of 22, 30 and 32 Gresham Street. Neither numbers 22 nor 32 Gresham Street submitted on the application. The residents of number 30 support the application subject to appropriate stormwater measures being implemented.

Conditions of consent

- 45 Ms Wilson recommends the adoption of the conditions proposed within the LVA, along with a few additional conditions outlined in her peer review. These have been adopted in the recommended landscape mitigation section of this evidence.

Matters raised in submissions

- 46 This section of my evidence focuses on responding to landscape matters raised by submitters. The location of each of the submitters is illustrated on page 3 of the attached **Graphic Annexure**. Of note, written approval for the application has been provided by the residents of numbers 2, 8, 34 and 36 Gresham Street.

1 Huffey Street (Johnston)

- 47 This submitter adjoins the new subdivision on two sides of their property. They support the application subject to practical matters being adequately managed during construction. They highlight that the construction of the new road access may affect two mature gum trees if works occurs near the base of them.
- 48 Response: Whilst the proposal will endeavour to retain these two trees, they are not listed as protected under statutory documents.

100 Cox Street (Allan)

- 49 This submitter is located on the outskirts of the proposed subdivision, 265 metres southeast of the planned southern access across a pastoral field. The closest new dwelling will be a minimum of 385 metres away. They oppose the application, stating they are concerned about the proposed high-density development and resultant urban sprawl, and the effect on private and public viewpoints from in and around Geraldine. They mention that they are not opposed to less intensive residential development on the site that is more in tune with the Rural 4A zone and its associated characteristics.
- 50 Response: It is acknowledged that the proposal will result in a visual change, however, with the mitigation proposed, it is anticipated that the overall landscape values of the area will be upheld and the effects of the proposal will reduce as landscaping establishes. Of note, the proposed subdivision cannot be considered 'high density' as the lot sizes range from a minimum of 5013m² to a maximum of 10,390m². For comparison, the submitters own property is smaller at 1674m², which is in line with other residential properties in the area.

Po Box 5, Winchester (Gibson)

- 51 This submitter seeks 2 hectare site development with reasoning unrelated to landscape matters.

6B Gresham Street (Drake)

52 This submitter is an immediate neighbour to the eastern boundary of the subdivision. They oppose the application, stating they are concerned about the eventual height of trees proposed e.g. Podocarpus totara, and the potential obstruction of sunlight, shading, and privacy. In addition, they mention that the change to the urban boundary could significantly alter the character of the area and reduce the rural outlook.

53 Response: Whilst it is acknowledged that the proposal will result in a visual change, it will not 'significantly' alter the character of the area. It is considered that this submitter's concerns can be adequately managed by including consultation in regard to planting near their boundary as a condition of consent. Plant growth rates are illustrated on page 9 of the attached **Graphic Annexure**.

Beca (on behalf of Fire and Emergency New Zealand)

54 This submission is unrelated to landscape matters.

17 Downs Road (Ensor)

55 This submitter is an immediate neighbour to the northern boundary of the subdivision. They support the application with conditions. However, they mention they have some concerns about the visual effects of the buildings and landscaping, even though they accept that the proposed conditions will mitigate visual effects. They highlight that lots 5-7, 9-11, 18 and 20 are directly visible from their property, with lot 10 directly in their line of sight from their living room. They have suggested several conditions to mitigate visual effects including a maximum 4.5 metre building height, vegetation no taller than 1 metre above buildings, a requirement for structures outside building platforms to be painted black, and the exclusion of trees on ridgelines.

56 Response: The maximum height for new buildings will not exceed 6 metres above ground level, except for chimneys and other small structures.¹² This is considered sufficient to ensure that the roofline of future dwellings will not dominate the landscape. Landscaping will be implemented as per the approved Landscape Concept Master Plan.¹³ The proposed shrubs and trees are necessary to integrate the dwellings into the setting and to provide screening. A recessive building colour scheme is proposed.¹⁴ Black would be more visually prominent. It is considered that this submitter's concerns can be adequately managed by including consultation with them as a condition of consent.

¹² Condition 16c of the applicants proposed conditions of consent.

¹³ Condition 6 of the applicants proposed conditions of consent.

¹⁴ Condition 18e-h of the applicants proposed conditions of consent.

19 Darby Street (Swann and Porter)

- 57 This submitter is located 225 metres north of the site and supports the proposal in its entirety. They consider the proposed subdivision to be a positive outcome that will make land available for residential housing and note that the development will not adversely affect their views or amenity.

2 Gresham Street (Singh and Mala)

- 58 This submitter is one of the closest neighbours to the proposed northern access to the subdivision. Their submission appears to be neutral. In relation to landscape, they express concern about potential shading and the loss of sunlight resulting from the proposed building placement and tall tree planting.
- 59 Response: It is unlikely this property will be affected by shading and loss of sunlight due to the closest planting being located 100 metres away from their dwelling. It is considered that this submitter's concerns can be adequately managed by including consultation with them in regard to planting as a condition of consent.

30 Gresham Street (France/The Holbrook Trust)

- 60 This submitter supports the application subject to appropriate stormwater management measures being implemented.

Section 42A report

- 61 The Section 42A report was produced by Mr O'Toole of TDC on the 31 March 2026. Landscape and visual amenity is addressed in Section 8.3 (pages 38 and 39) and Section 8.5 (pages 42 to 43) of the report.

Density

- 62 The Section 42A report states on paragraph 2 of page 38 that *"...the proposal would result in a fundamental change in land use from light pastoral farming to a relatively high density rural-residential subdivision, increasing the number of residential units from the underlying expectation of low-density development (effectively what is the existing situation, being two records of title, one being 10ha and the other at 11.77ha) to a total of 25 allotments."*
- 63 Whilst I agree wholeheartedly there will be a substantial change in density when transitioning from 2 lots to 25, the subdivision cannot be classed as 'high density'. That is because:
- (a) The proposed lot sizes for the subdivision range from a minimum of 5013m² to a maximum of 10,390m². In comparison the average allotment size in Geraldine township typically ranges from 650-800m² up to 1200m²+

- (b) High density typically refers to urban development with a high concentration of dwellings and/or people within a given area, and smaller allotment sizes.
- (c) The site's surrounding context has been disregarded, particularly its interface with residential township-scale development on two sides.

64 **Whilst it is recognised that there will be a substantial departure from what is anticipated under the District Plan framework, the key consideration is the effects of the proposal on the landscape values identified.**

65 Of note, my own observations of the existing landscape values, and those recorded in the Geraldine Downs Landscape Study and the Timaru District Landscape and Coastal Study are all comparable, when evaluating the localised (site) scale of the proposal and its surrounding context. As such, I continue to believe that with mitigation, the site has sufficient landscape capacity to absorb the change in density proposed.

Growth rates

66 The Section 42A report mentions near the top of page 39 that "*...the proposed mitigation would require a period well in excess of five years to become effective.*" (underlining mine). I disagree with this perspective because:

- (a) The anticipated plant growth rates illustrated on page 9 of the attached **Graphic Annexure** do not portray this outcome.
- (b) The applicant's other subdivision in Geraldine at 26 Ribbonwood Road has established quicker than expected. Within 3 years they had native plants which had been planted at 2.5L grades reaching 1.5 - 2 metres in height.
- (c) My professional experience leads me to believe establishment will take close to the 5-year period, but it is unlikely to take longer than this.

67 In addition, the applicant has proposed a condition (condition 8) which requires landscaping to be planted within the first planting season after consent is granted. This would allow growth rates to advance prior to the full effects of the subdivision being recognised. It is entirely possible to plant the swales, gully area and outer boundaries whilst still keeping access to building platforms clear.

Cumulative effects

68 The Section 42A report has addressed cumulative visual effects in paragraph 3 on page 39. It states: "*...when considered collectively, those visual changes contribute to a broader landscape character effect that is more than minor. In this respect, the overall landscape effect is not simply the sum of individual viewpoints, but rather*

the perceptual change arising from the introduction of a continuous pattern of development across the hillside forming the township backdrop.”

69 I believe the above paragraph lacks clarity and may lead to misunderstanding. This is because:

(a) The focus is on the change that will occur rather than the effects being generated.¹⁵

(b) No one viewpoint will be able to view all 24 new dwellings.

(c) The subdivision will be constructed in two stages.

70 Cumulative effects of the proposal including the increase in density, domestic activity, vehicle movements, and lighting (all things which contribute to effects on visual amenity) have been considered and factored into the conclusions I have reached.

Conditions of consent

71 Section 13 (pages 64-74) of the Section 42A report contain the recommended conditions of consent from TDC. For landscape matters, these cover aspects such as adherence with the Landscape Concept Master Plan (illustrated on pages 4 and 5 of the attached **Graphic Annexure**), design controls, building heights, roof pitch, anti-reflectivity and recessive colours, lighting, fencing, entrance features, bunds, and consultation with neighbouring residents.

72 Overall, I consider that the conditions proposed by TDC could be refined to eliminate the current duplication and reduce the potential for future conflict. I have also highlighted a few concerns below:

Roof reflectance value

73 Condition 3(d) mentions that *“Building roofs shall be coloured natural greens, greys or browns with a light reflectance value no greater than 10%, and shall have a matte finish, or a living ‘green’ roof with vegetation to blend into the surrounding landscape.”*

74 Response: Restricting building roofs to a light reflectance value of no greater than 10% is pushing into the darker end of the colour spectrum (black, almost black, and very dark grey/greens) and this is not always the best outcome for mitigating visual effects. I suggest this value is increased to <30% and roofing colours are

¹⁵ Change in landscape does not automatically constitute an adverse landscape or visual effect. Landscape is dynamic and constantly changing over time in both subtle and more dramatic transformational ways.

limited to a colour palette which responds to this particular site and context. The best colour range can be found within the ColourCote selection.

Consultation with neighbours

75 Condition 6 mentions that *“The planting on the approved landscape plan along the boundaries of Huffey Street and properties accessed from Downs Road, Darby Street and Gresham Street must be established in consultation with those neighbouring property owners.”*

76 Response: This condition is unnecessarily onerous given the large number of residents that would need to be consulted. I suggest that only submitters who have raised concerns landscaping should be included in this process (e.g. 1 Huffey Street (Johnston), 2 (Singh and Mala) and 6B Gresham Street (Drake), and 17 Downs Road (Ensor).

Plant grades

77 Condition 8 mentions that *“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.”*

78 Response: I agree with the larger trees being a grade of 25L when planted. In regard to all other planting being a minimum grade of PB5 when planted, I believe having this specific grade is unnecessarily restrictive. I propose that plants should be 2-3L or PB5 at the time of planting for amenity planting. For reference PB5 is equivalent to 2.5L. This would provide almost the same outcome but allow the applicant more flexibility when sourcing plants, increasing the chance of being able to source plants propagated from the local area.

Recommended landscape mitigation

79 Proposed landscape mitigation measures have been described in **Section 9 of the LVA**. They assist to avoid, remedy, or mitigate the landscape and visual effects generated by the application.

80 Since the section 92 RFI and the landscape peer review have been received, the landscape mitigation has been refined. This has included responding to the additional suggestions that Ms Wilson made in her landscape peer review.

81 She recommended that the proposal proceed in accordance with the **Landscape Concept Master Plan**. She also proposed additional consent conditions, which included hydroseeding once earthworks are complete, minimum grades for native planting, replacement of damaged or dead trees within the existing western shelter belt, and a permeable low post-and-rail or wire fencing with low timber or wire entrance gates where required. All suggestions have been incorporated.

82 Consequently, the **Landscape Concept Master Plan** produced by Innate has been updated to Revision G. For reference, this plan and the accompanying details are illustrated on pages 4 and 5 of the attached **Graphic Annexure**.

83 For reference, **Table 4** below provides a comprehensive and updated list of the landscape mitigation measures proposed by the applicant. These are also reflected in the proposed conditions of consent.

Table 4: Proposed landscape mitigation measures

Proposed Landscape Mitigation Measures	
1. Design	
a.	All buildings will be located within the 800m ² building platforms as indicated on the Landscape Concept Master Plan , Revision G. ¹⁶
b.	The minimum lot size will be 5000m ² . ¹⁷
c.	The maximum height of buildings and structures will be 6m from ground level.
d.	There will be a maximum building footprint of 350m ² . This will include dwellings, ancillary buildings, roof overhangs, and any other structures.
e.	All structures including accessory buildings, washing lines, patios and similar will be located within the nominated building platform area to cluster built form together.
f.	Rooflines will have a pitch of no more than 35 degrees.
g.	Ancillary buildings will be similar in style and materials to the main buildings.
h.	All design will follow the guidance of Part D1, 1.11.4A 7.1 of the ODP , which lists layout and design criteria that must be adhered to in regard to surrounding landform, minimising excavation and earthworks, having setbacks from roads, ensuring the scale of built form is appropriate and relates to the surrounding landscape, and using appropriate materials and colours. ¹⁸
2. Colour and materiality	
a.	Building roofs will be coloured natural greens, greys, or browns with an LRV of <30%.
b.	Building roofs will have a matte finish, or a living 'green' roof to blend into the landscape.
c.	Exterior claddings will use timber (naturally weathered, stained, or painted), locally sourced stone, painted steel sheeting, plain concrete block, or painted plaster.
d.	Exterior cladding will be grey, blue, or brown in colour with an LRV <40%.
e.	Window and door joinery will be in the same or a darker shade of the wall and roof colours.
3. Fencing	
a.	Allotment boundary and internal fencing outside of the curtilage will be limited to low timber post and wire/steel mesh or netting, and curtilage fencing to timber post and wire/netting or timber post and rail fencing.
4. Planting	
a.	Planting will follow the intentions set out in the Landscape Concept Master Plan , Revision G.
b.	Planting along the boundaries of Huffey Street and properties accessed from Downs Road, Darby Street and Gresham Street will be planted as soon as possible. ¹⁹
c.	Neighbours who submitted on the application and who reside adjacent to the northern boundary or eastern stormwater swale will be consulted with in regard to planting along their boundaries. This includes 1 Huffey Street (Johnston), 2 (Singh and Mala) and 6B Gresham Street (Drake), and 17 Downs Road (Enzor).
d.	The existing shelterbelt along the westernmost site boundary will be retained.
e.	All planting will occur within the planting season (between 1 May and 30 September) each year.
f.	Planting on individual lots will include the following as shown on the Landscape Concept Master Plan: ²⁰ <ul style="list-style-type: none"> • A minimum of 4 trees on each allotment, capable of attaining a minimum height of 8m at maturity.

¹⁶ This will ensure that the most suitable building location is chosen to capitalise on outward views, minimise landscape and visual effects, and to provide future landowners with certainty of their building location relative to neighbouring dwellings.

¹⁷ Having larger lots reduces the visual intensity of the development.

¹⁸ The list provided in the table is a summary of a more comprehensive list.

¹⁹ This will ensure that the planting is established as early as possible, thereby providing quicker mitigation.

²⁰ The proposed planting aims to create a contiguous planting palette across all lots, as well as integrate the subdivision into the wider context. Additionally, it will improve amenity and ecological values and provide some screening and softening of built form.

	<ul style="list-style-type: none"> • These trees shall be planted no closer than 10m apart. • At least 2 of the 4 required trees shall be planted in the 6m road setback. • Planted bunds between allotments • Planted bunds around the building platforms of Lots 8 to 14 and Lot 18.
g.	Plant species will be selected as per the species recommendations in the Geraldine Downs Native Bush Areas Species List ²¹ , NZPN Plant lists for Talbot Forest OR the Indigenous Plants of Talbot Forest List outlined by DoC unless already listed on the plant growth table within the Graphic Annexure OR as approved by TDC. ²²
h.	<p>At the time of development, a detailed landscape plan for each individual allotment will be prepared by a Registered Landscape Architect for Certification by TDC. This should be measured against the following objectives:</p> <ul style="list-style-type: none"> • The extent to which it follows the intentions of the Landscape Concept Master Plan and this table. • The extent to which the planting softens built form when viewed from beyond the subdivision. Attention shall be given to ensuring that planting on Lots 8 to 14 and Lot 18 will soften and screen the dwellings so that they are well integrated into the landscape when viewed from the adjoining neighbouring properties. • The extent to which the planting design has considered the guidance of Part D1 1.11.4A 7.3 of the ODP relating to landscape planting and the following matters: <ul style="list-style-type: none"> • Following and complementing natural landform patterns and boundaries. • Building on and merging into existing vegetation. • Avoiding straight line edges to plantings. • Grouping planting, rather than planting individual trees. • Grouping plantings of several species which can be more appropriate than individual plants or groups of one species.
i.	Once the initial subdivision layout and infrastructure is in place, planting within the new road corridor is to occur as quickly as possible (but within the planting season). This will allow for the maximum growth period before dwellings are constructed.
j.	Native planting is to be planted at the minimum grades specified on the Plant Growth Table in the appended Graphic Annexure (depending on whether they are required for screening or amenity/ revegetation i.e., along the gully swale). This is with the exception of the two large trees (min. height 8 metres) that will be planted on individual lots within 6m of the road corridor boundary where a minimum grade of 25L will apply.
k.	Any plants that are dead, diseased, fail to thrive or are damaged will be replaced with a same or similar plant species within the following planting season, within the duration of the subdivision consent and the defects liability period.
5. Lighting	
a.	Lighting will be directed downward to avoid light spill beyond the domestic curtilage area.
b.	Exterior lighting will be for practical purposes only and shall not be used to accentuate built form or planting.
6. Bunding	
a.	Bund heights will be kept to a maximum height of 1m with gentle curves.
7. Earthworks	
a.	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.

Recommended landscape conditions

- 84 The proposed conditions of consent relating to landscape matters are set out in the evidence of Mr Geddes. In my opinion, these conditions support sufficient landscape mitigation for the proposal.

²¹ Provided in Appendix 2 of the Geraldine Downs Landscape Study.

²² There are five plants on the Landscape Concept Master Plan that do not appear to come from any of the approved lists. These are *Carex testacea*, *Chionochoila rubra* and *Poa cita*. These could be replaced with *Carex solandri* and *Carex secta*. Also, *Muelenbeckia astonii*, could be replaced with *Muelenbeckia complexa*, and *Kanzea ericoides* could be replaced with *Leptospermum scoparium* (all plants on approved lists).

Conclusion

- 85 Within this statement of evidence, I have considered the landscape and visual effects of the proposed subdivision at 44 Gresham Street, Geraldine. Overall, I consider the effects arising from the subdivision will be appropriate within the rural environment.
- 86 I am of the opinion that the proposal will result in:
- (a) Landscape effects that will be adverse **low (minor)**.
 - (b) Visual effects that will range from adverse **low to moderate (minor) to very low (less than minor)** depending on the location of receptors. Overall, adverse visual effects are anticipated to be **low (less than minor)** and will reduce once planting is established.
- 87 Whilst it is recognised that there will be a substantial departure from what is anticipated under the District Plan framework, the key consideration is the effects of the proposal on the landscape values identified.
- 88 Of note, my own observations of existing landscape values, and those recorded in the Geraldine Downs Landscape Study and the Timaru District Landscape and Coastal Study are all comparable, when evaluating the localised (site) scale of the proposal and its surrounding context.
- 89 When considering the effects of the proposal on these identified values alongside the proposed mitigation measures, I believe that the site has sufficient landscape capacity to absorb the subdivision proposed.

Naomi Louise Crawford

7 April 2026

Annexures:

1. **PDP Statutory Provisions Assessment** in relation to landscape matters (attached at the end of this evidence – refer to the pages which follow).
2. **Graphic Annexure** (attached as a separate document)

ANNEXURE: STATUTORY PROVISIONS ASSESSMENT

Table 5: Proposed District Plan Policies

Section	Policy	Comment
RLZ-P3 Character and Qualities	<p><i>The character and qualities of the zone are maintained by:</i></p> <ol style="list-style-type: none"> 1. <i>ensuring the scale and setback of buildings and structures provides for an open character and access to sunlight; and</i> 2. <i>ensuring trees do not cause overshadowing; and requiring trees that will contribute to rural and natural character; and</i> 3. <i>ensuring road boundary treatments and allotment sizes maintain an open character; and</i> 4. <i>ensuring activities are compatible with residential amenity and do not adversely affect the character and qualities of the zone.</i> 	<p>The proposal is considered to maintain the character and qualities of the zone in general accordance with RLZ-P3.</p> <p>While the subdivision and anticipated future dwellings will reduce the existing level of openness across the site, the development is expected to retain a landscaped, semi-rural character.</p> <p>Visually, the proposal provides an appropriate transition between the more established residential pattern to the north and east and the more open rural environment beyond.</p> <p>This transition is supported by the proposed allotment sizes, road boundary treatments, subdivision layout, building setbacks, and building controls, which will help maintain a sense of spaciousness, access to sunlight, and a more open feel relative to adjoining higher-density sites to the north and the east</p> <p>Four trees capable of reaching 8m in height are proposed on each individual lot and a comprehensive landscape plan has been provided to screen and soften future buildings. Species will be selected from local plant lists.</p>
NFL-02 Visual Amenity Landscapes	<p><i>The landscape character and visual amenity values of the visual amenity landscapes of the Timaru District are maintained or enhanced.</i></p>	<p>It is considered that this objective is met.</p>
NFL- P3 Maintaining and enhancing Visual Amenity Landscapes	<p><i>Only allow subdivision, use and development within VALs, that is not provided for in NFL-P2, where it can be demonstrated:</i></p> <ol style="list-style-type: none"> 1. <i>how the identified values and characteristics of the VALs described in SCHED10 – Schedule of visual amenity landscapes will be maintained or enhanced;</i> 2. <i>that the landscape has the capacity to absorb the change;</i> 3. <i>that the proposal can be visually integrated into the landscape and will not break the skyline or ridgelines; or</i> <p><i>while taking into account:</i></p> <ol style="list-style-type: none"> 1. <i>the scale of modification to the landscape;</i> 2. <i>any potential cumulative effects,</i> 3. <i>the measures proposed to mitigate the effects on the values and characteristics, including the location, design, scale and finish of any buildings or structures or earthworks, and landscaping.</i> 	<p>Consideration of how the identified values within VAL 3 Geraldine Downs Schedule 10 will be maintained and enhanced is addressed in the table which follows.</p> <p>It is considered that the landscape has the capacity to absorb the change. The scale of the development is quite large, but it is not considered likely to generate cumulative effects that would make the combined effects of residential activity in the area unacceptable.</p> <p>The subdivision will be visually integrated into the landscape through the careful placement of vegetation and trees, which will soften and screen the built form. Future dwellings will not break the skyline or ridgelines.</p> <p>A range of mitigation measures is proposed to address the effects on the character and value of the landscape.</p> <p>The proposal is anticipated to be generally consistent with NFL-P3.</p>

<p>SUB-P15 Rural Lifestyle Zone</p>	<p><i>Require subdivision in the Rural Lifestyle Zone to:</i></p> <ol style="list-style-type: none"> 1. <i>maintain the character and qualities of the Rural Lifestyle Zone; and...</i> 2. <i>maintain larger allotment sizes in the Geraldine Downs to protect its landscape character and amenity values, and</i> 3. <i>...</i> 	<p>As set out in my evidence, the proposal is considered to have landscape effects that will be adverse low (minor) and visual effects that will range from adverse low to moderate (minor) to very low (less than minor) depending on the location of receptors. Overall, adverse visual effects are anticipated to be low (less than minor) and will reduce once planting is established.</p> <p>The site's character will shift from a rural to a large-lot residential pattern, with allotment sizes ranging from 5,013m² to 10,394m² (with an average of 6,116m²).</p> <p>This is a materially higher density than that contemplated within the 10ha lot size Specific Control Area. However, as noted above, the proposal is considered to provide a logical transition between the existing higher-density urban edge and the rural land beyond.</p>
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<p>VAL 3 Geraldine Downs – Schedule 10</p>	
<p>Relevant Landscape Values and Characteristics</p>	<p>Comment</p>
<p>The openness of the Geraldine Downs and cohesive repetition of well-maintained rolling hills of pasture, patches of vegetation following the undulating topography and views of surrounding plains and mountains all add to its aesthetic quality.</p>	<p>The broader Geraldine Downs landscape will retain its openness. At the localised (site) scale, openness will be reduced as a result of future dwellings.</p> <p>However, given that the lot sizes will range from 5,013m² to 10,394m² (with an average of 6,116m²), the site will retain elements of open space and a noticeably greater degree of openness than the adjacent urban fringe. Although additional trees, vegetation, and built form will be introduced, the site will retain its rolling hill landform.</p>
<p>Geraldine Downs volcanic formation is clearly expressed and legible by the topography of radiating flows of a sheet of lava. Exposures of volcanic rock are apparent on cliff faces particularly to the north of the area.</p>	<p>The proposed subdivision will not impact on the legibility of these volcanic features.</p>
<p>Talbot Forest is a nationally significant Scenic Reserve with very high ecological value. It is a remnant dryland podocarp forest on the east slopes of the Downs which acts as a forest backdrop to the Geraldine township.</p>	<p>Talbot Forest is located approximately 650m from the site and will not be affected by the proposal.</p>
<p>Threatened long-tailed bats (pekapeka) inhabit Talbot Forest along with indigenous bird species such as rifleman, kererū, and South Island pied tit.</p>	
<p>Transient landscape values important within this landscape are: views of sunrises and sunsets; views of changing weather patterns; the presence and sightings of wildlife such as bats flying over the landscape; hearing bird songs and calls.</p>	<p>Future dwellings will be located away from ridgelines. Transient patterns such as sunrises, sunsets, and changing weather will remain evident. The proposed native vegetation will provide ecological value and habitat for wildlife.</p>
<p>Rural settlement has occurred along some of the roads throughout the area. The attractiveness for living reflects its high amenity value and distinguishes it from other rural areas that are predominantly used for agricultural production.</p>	<p>The proposal will integrate into an area bordered to the north and east by residential development. The subdivision has been designed sensitively so that the attractiveness and amenity of the Geraldine Downs will be maintained.</p>
<p>Several QEII covenants are located within the Geraldine Downs.</p>	<p>The proposal will not affect any QEII covenants.</p>