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MEMO

Project: Brougham Street Commercial Development - 45-51 Brougham Street

To: Luke Balchin - Senior Environmental Planner, NPDC

From: Richard Bain - Principal Landscape Architect, Bluemarble

Date: 2 February 2021

Subject: Peer Review of Landscape & Visual Impact Assessment

PEER REVIEW OF LANDSCAPE AND VISUAL AMENITY EFFECTS (LVIA)

ASSESSMENT REVIEW

I have been commissioned by New Plymouth District Council to carry out a peer review of the *Landscape and Visual Impact Assessment* 1 September 2020, prepared for KD Holdings Limited by Boon architects - authored by Daniel McEwan Landscape Architect. I have previously reviewed an earlier version of the LVIA - my review dated 30 July 2020. Therefore this review does not repeat matters covered in the July review but focusses on three recommendations made in my earlier review.

1. *An analysis be provided to show the heights and scale of buildings around the site and greater CBD; to show how the building fits within the pattern of development that currently exists. It may also assist the assessment to identify to what extent the proposal fits within the City Centre Zone of the Proposed District Plan, including reference to the City and Town Centre Design Guide.*
2. *Design alternatives and/or more certain descriptions of materials and colours be provided for the top level apartment.*

3. *A3 visualisations be created for Viewpoints C, D, & E and Viewshafts 1 & 2 (Marsland Hill & Victoria Road). Larger prints of these images would be useful in understanding the scale of the proposal and potential dominance effects, and would enable assessment to be made by having images that can relate to actual on-site views at a similar scale.*

The revised LVIA (Revision A 1 September 2020) states;

This current revision A of the LVIA has taken into consideration the following updated and additional documentation and processes:

- *Peer Review of Landscape and Visual Amenity Effects - by Richard Bain from Bluemarble for NPDC.*
- *Revised Architectural Design documents – by BOON Ltd, reflecting LVIA and CIA mitigation measures.*
- *Discussions and Hui relating to the Cultural Impact Assessment (CIA), currently being undertaken by Ngāti Te Whiti for NPDC.*

In response to the key additions and updates within the revised LVIA I make the following comments.

PROPOSED DEVELOPMENT

The building description states the intention that the glazed facade is to create visual and sunlight permeability, aiming to *'create a lighter visual impact by having a more permeable external envelope with the potential of some reflection from the sky and surrounding urban form'*. It goes on to say that the glazed facade is tinted and includes fritting - the fritting is to inform part of the cultural narrative, and that *'the treatments to the glazed façade will be designed to meet heat reduction and glare criteria while maintaining a good level of external visual permeability into the building while contributing to the overall aesthetics'*.

The top-level apartment has been redesigned with vertical timber cladding and full height glazing on three elevations. The changes have been made with at the aim of reducing the scale of this top-level apartment.

Other changes to the building relevant to landscape and visual effects are timber elements on the external stairwell to express cultural narrative, and a paved link through the building evocative of fishing nets.

A grass area is included outside the top apartment.

Considerable thought and several design iterations have been undertaken on this project to try and reduce the effects of the over-height and to incorporate cultural narrative. In my view, these design changes reduce the dominance effects of the development compared to the original design though a combination of setback, facade modulation, reduced soffit overhang, and materials.

There is an emphasis in the assessment on how visual permeability mitigates the effects of the over-height portions of the building. However, it is not clear how this permeability can be achieved. In my view, there is risk that the glass will appear as a black visually impermeable facade. The glass on the council building is a

good example of this. It would be useful if there was more understanding of what level of tinting is proposed.

EXISTING ENVIRONMENT

Notable Tree

I agree with the LVIA that the tree currently provides good amenity from various street-level vantage points from Marsland Hill/Pūkākā.

Built Form

The LVIA notes that the majority of buildings in the area are within the 14m height restriction, the exception being the Powderham Street parking building. The LVIA includes an accurate description of the site's immediate building context but doesn't fully assess how the proposal will contribute to the character of the wider area. I provide more comment on this later in this review.

Open Space

The role of Sir Victor Davies park is discussed, describing the positive effects of the space and its trees on the area.

LANDSCAPE EFFECTS

Several positive effects are described in the LVIA but it also states that the building will have an impact on the scale within the existing environment as most existing buildings are within the 14m height restriction. It notes the presence of the nearby heritage buildings but does not fully analyse how these may be affected (or otherwise) by the proposal, other than to say that the '*local area is characterised by a high degree of variability in built form, scale and appearance which means the proposed building can be absorbed into this urban character to some degree.*' An assessment of effects on the heritage character area has been undertaken (18 January 2020) by Clive Cullen Architect and concludes;

The proposed building will not adversely affect the heritage values associated with the Heritage Character Area or the nearby heritage buildings;

While large, the mitigation measures included in the design offset the issue of potentially "overwhelming" the nearby heritage buildings;

It will add to the amenity of the area in terms of adding connection to Maori cultural values related to the area as well as adding the ongoing mix of old heritage building and modern ones.

I note that the LVIA (*will have an impact on the scale within the existing environment*) and Mr Cullen (*while large*) gives consideration to the size and scale of the building within its immediate context.

I agree that a tall building on an intersection will have an anchoring effect and is preferable to a mid-block tall building. However, I don't consider that the over-height portion will have only a *'slight adverse'* effect on the continuity of the street's buildings, considering it is so demonstrably tall compared to its neighbours.

In my view, the LVIA's description of the area as being dominated by low-quality environment doesn't fully identify the potential adverse effects of the proposal. I agree that there are positive effects of a new building on the site, but the building is considerably taller than the permitted limit of 14m. The LVIA states that effects can be offset by its positive design characteristics.

Notable Tree

I agree that the removal of the notable tree will have similar character effects to it being screened from a permitted height building. Further, while the tree has a strong presence due to its height and breadth, its position over a gravel carpark enables a level of visibility that maximises its presence. Any development on the site would likely reduce the tree's visibility and therefore reduce its contribution to the amenity of the area. As a landscape element, the tree has an unusual shaped trunk that gives every impression of it being compromised by its position by a stone wall. This reduces its presence as a stand alone specimen tree in its urban context, and provides little amenity to the Huatoki Stream. The building opposite the tree (the downtown carparking building) also reduces the amenity of the tree by creating an unattractive dark backdrop on which the tree is viewed. These characteristics when combined reduce the contribution of the tree to the amenity of the area.

Cultural Narrative

In my view, the proposed cultural narrative elements will create a distinctive and positive sense of place.

Huatoki Stream

The LVIA notes that The Huatoki Stream is a point of focus in the PDP and describes how the project relates to this waterway. A paved landscape element has been introduced to the design to indicate and accommodate a connection to the Huatoki Stream through the building from Brougham Street. The LVIA states that any future potential Huatoki Stream development does not inform any part of the LVIA and is therefore considered as separate to the current consent application.

In my view, the project provides some measure of linkage and acknowledgement of the stream and its margins. The paved pathway through the building is evocative of the stream's cultural heritage and amenity as a central city waterway. The stairway on the eastern side of the building encroaches onto streamside land owned by council but the extent of the encroachment is unlikely to significantly prevent future development of the stream and any possible daylighting downstream. Having said that, the treatment of the area between the building and stream is presently uncertain.

VISUAL EFFECTS

Shading

Shading effects are identified for the Brougham Heights Motel and NZME building during winter, as well as shade on Sir Victor Davies Memorial Park. Overall, I agree that the shade effects are low.

Over-height infringement

The LVIA summary states that *'over height portion of the proposed building presents the potential for adverse effects primarily in the **Marsland Hill/Pūkākā** and **Victoria Road Viewshaft** and **viewpoints C, D, G & H**. While it is relevant to note that a 14m high compliant building would be visible in a number of views (especially Victoria Road & Marsland Hill), the height and scale of the proposed building means that it will be highly recognisable/distinguishable in these views. Although the Marsland Hill has **High 'VAC'** with the existing built form there will be a noticeable change in the texture of the urban fabric as the proposed buildings mass and roof form will predominantly occupy what currently is a variety of existing buildings ranging in aesthetic quality and affording a greater perception of the city layout from this view. The Victoria Road Viewshaft (see **Appendix A, Viewshaft 2**) where the reveal along the Victoria Road approach of the proposed over height infringement will be highly recognisable and resulting visual effects will be **Moderate 'adverse'**.*

I agree that the proposal will be *'highly recognisable/distinguishable'* in views identified and that impacts on the Victoria Road Viewshaft will be **Moderate 'adverse'**. In my opinion, the adverse effects from the Victoria Road Viewshaft can only be fully mitigated by reducing the building's height.

MITIGATION

Mitigation measures are proposed in addition to those existing as part of the proposal.

The proposed measures are:

- *Soft landscaping/planting to the top apartment exterior spaces. This needs to be carefully considered and seek opportunities where further softening and or enhancement of the top apartment can be achieved without providing further scale to the top level. An example of this could be strategically placed foliage wire and climbers that complement and soften portions of the apartment façade as opposed to a tree planter located on the corners of the building which would potentially add adverse effects on scale.*
- *Planted elements to the Huatoki Stream/Eastern edge of the proposed building. Soft-scaping and vegetation are to be considered in support of the retained Kentia Palms to mitigate the adverse effects as a result of lost amenity with the proposed removal of the notable tree. There is potential for small gardens to the Southern side of the main door and in front of the timber stairwell façade. Foot traffic tolerant planted portions of the paving should also be considered to further promote water sensitive design and potentially tie into the cultural narrative or themes associated with the proposal.*

I agree that these measures would provide additional mitigation to the proposal.

LVIA CONCLUSION

The conclusion states the building fits well within the existing fabric with the exception of the Victoria Road Viewshaft.

The conclusion places considerable focus on the positive effects of the building - these being its overall aesthetic, green building practice, visual permeability at pedestrian level and connection to the Huatoki Stream, and cultural narrative.

The LVIA concludes that there will be a change in effects on the scale of the existing environment but that *the overall impact on character and amenity will be **Low**, but will achieve overall '**beneficial**' contributions to the current and future planning and policy objectives.*

In my opinion, the previous sentence reflects the conundrum of this project. The building will potentially adversely affect the Victoria Road viewshaft and be highly recognisable/distinguishable in other viewshafts and viewpoints, but will also provide a number of benefits - these being in my view, cultural expression, urban vibrancy through increased worker density in the heart of the CBD, positive orientation and access to the Huatoki Stream, and a well designed aesthetically pleasing architecture.

BUILDING HEIGHTS IN CBD

In my view, assessing the potential effects of this building's proposed height rest with understanding the framework of existing buildings within the city centre area. The Proposed District Plan includes height management areas that are in large part based on a Building Height Management report prepared by bluemarble in 2018 as part of the District Plan Review. Based on this previous work I make the following comments concerning this project and its potential effects on the character and amenity of the area.

The city centre's taller buildings are primarily located on the eastern and western flanks of the Huatoki gully/basin. Generally, this means that these buildings are located on higher ground, which has the effect of accentuating existing topography. This increases the legibility of the Huatoki Stream area and also accommodates views through to the sea, from the south. Please refer to the plan **attached** which shows the spatial location of buildings over 14m high.

The PDP Height Management Areas continues this existing general pattern by having lower heights in the low lying Huatoki Stream basin area and maximises open space to express the stream as an environmental and cultural resource. Taller heights (up to 17m) are located outside the basin (including the Brougham Street subject site) and up to 22m further east and west to 'frame' the city centre.

The rationale for increased building heights for New Plymouth is based on several principles.

- The Huatoki basin has cultural and landscape values that should be maintained and enhanced.
- The city has a number of tall buildings that contribute to the 'little city' concept.
- The city centre should be clearly defined to create intensity and avoid strip development.
- Increased population living, working, and visiting the city provides for increased vibrancy.
- Mixed-use is considered desirable for economic resilience.
- Development must contribute positively to the city's amenity and identity.

- Intensifying the city centre makes efficient use of existing public infrastructure.

The Brougham Street commercial development is consistent with most of these principles, hence the positive aspects identified in the LVIA and acknowledged in my response. However, the building is located outside the PDP Height Management Area identified as being suited to buildings of this height. A tall building on the subject site could potentially interrupt the city's existing building height pattern, begging the question of how tall is too tall? In this context, the risk of the building's height relates to reduction or loss of seaward views from the city and its fringes (including urban viewshafts), dominance effects over buildings in the area and public spaces (Huatoki Stream and Sir Victor Davies Park), and general visibility of a tall visible building in a mostly low rise part of the city. Given the city's existing building height pattern, and the PDP's Height Management Areas which aim to reinforce and intensify this pattern, the proposal is in my view, taller than desirable. While a taller building will potentially contribute to 'framing' the Huatoki basin area, there is a point where additional height risks creating potentially adverse effects.

Assuming the PDP Height Management Area is adopted, it accepts the potential effects created from 17m high buildings and considers that this height will contribute to the city's urban fabric. Given that the proposal is 25.5m tall (at the northern boundary), it is well outside the parameters of both the ODP and PDP. However, balancing the positive potential character and amenity effects of the building and taking its site specific characteristics into consideration, the building could, in my opinion, be up to 21.5m tall (a five-storey building instead of six), and still provide the identified positive benefits as well as avoid potential adverse effects. If the building was 21.5m tall it would essentially be one storey taller than the 17m height limit in the PDP. While the PDP does not have any bonus floor provisions (as in the Auckland Unitary Plan), the principle could be applied to this project. Bonus floor provisions allow developers to increase the floor space of a development by providing public access or benefit, such as through-site access, public viewing decks, plazas, and so on. Given that the Brougham Street project includes ground level amenity adjacent to the Huatoki Stream and entrance and foyer design referencing the head of the Huatoki estuary, the principle of a 'bonus floor provision' could apply.

In summary, given the city's existing building pattern, and the building height parameters in the ODP and PDP, the proposal will in my opinion create potential benefits for the city centre, but also risks creating potential adverse effects on the character and amenity of the area and Victoria Road viewshaft. I consider that the redesign of the top-level apartment reduces effects compared to the original design and that the proposed mitigation measure would further reduce potential effects, albeit to a limited extent.

Richard Bain

Landscape Architect

