

Memorandum

To Jerome Wyeth
Technical Director - Planning, SLR

From Melean Absolum
Landscape Architect, MALtd

Date 31 August 2025



Dear Jerome,

SUBMISSION 183 MOUNTAIN LANDING PROPERTIES LTD

INTRODUCTION

This memorandum records my response to the rebuttal evidence with attached revised provisions of Mr Vijay Lala, planner and Mr Gavin Lister, landscape architect, on behalf of the above submitters, dated 22 August 2025. It has been prepared prior to the start of Hearing 15B and may need to be updated after hearing evidence from MLP during the course of the hearing and potentially as part of a wider right of reply.

Mr Lister's rebuttal evidence is set out under the following headings:

- Matters on which we¹ potentially agree;
- Matters on which Ms Absolum reserves her position; and
- Matter on which we don't agree.

I shall respond using the same headings. Additionally, I include commentary on the revised provisions which were not available at the time I prepared by last memo (6 July 2025).

MATTERS ON WHICH WE POTENTIALLY AGREE

Legible identification of house sites on Precinct Plan 1

Mr Lister has confirmed that TLDA-Plan 1 (now proposed to be TLP-Plan 1) has been updated to include revised house site numbers and the coordinates of the red dots which identify where the 'centre of weight'² for each house site is located on the lot. Mr Lister goes on to explain that:

"the Lots that do not have approved house sites are those incorporated into The Landing from Mataka Station (Lots 10-14) and the relocated Lot 25."³

However there are seven lots on the plan included in Mr Lister's rebuttal evidence that do not have red dots. The one not listed by Mr Lister is Lot 17 towards the south-eastern corner of the property. It is not clear whether house sites have been identified for either Lot 17 or Lot 25.

¹ Mr Gavin Lister and Ms Melean Absolum

² Explained in Mr Cheshire's rebuttal evidence

³ Paragraph 2.3 rebuttal evidence of G Lister

To complicate matters, Mr Lister goes on to explain that:

*"The numbering has changed since the 2004 consent. To enable cross-reference, both the 2004 and 2005 numbering is tabulated in the Landscape guidelines attached to this rebuttal."*⁴

It is not clear whether the lot numbers on either the plan Mr Lister has provided or the plan included in the proposed provisions are from the 2004 or 2005 subdivision.

I note that no co-ordinates are provided for Lots 26-45, despite red dots being shown on these lots. I assume they are among those referred to by Mr Lala thus:⁵

"However, several residential lots do not have an identified building location. On these lots, residential development is a restricted discretionary activity. I consider the proposed approach to be appropriate as it will enable a more thorough assessment of the proposed residential development location, given that this assessment was not comprehensively undertaken as part of any previous resource consent application process."

Assuming this is the case, then I note that proposed TLP-R1 RDA matters of discretion "b. The location of the building or structure" would apply. As Mr Lala states, this would enable a more thorough assessment of the proposed development to be undertaken.

Clarification or confirmation of all these points would be helpful.

Site-by-Site Landscape Guidelines

The Site-by-Site Landscape Guidelines are now included in the proposed provisions provided as Attachment 1 to the rebuttal evidence of Mr Lala. Together with the General Guidelines, they satisfy the concerns I had raised with respect to the Architectural and Landscape Guidelines in the earlier provisions which concentrated on architectural matters and omitted guidance already provided by Mr Lister as part of his evidence in chief.

Confirmation that the 2005 Lot numbering corresponds with the Precinct Plan lot numbering remains the only outstanding issue.

MATTERS ON WHICH I RESERVED MY POSITION

Consistency between TLP-Plan 1 and approved Masterplan and Ecological Management Plan

In his memo dated 6 July 2025, Mr Listed stated:

We are updating TLDA-Plan 1 (now TLP-Plan 1) to depict the ecological planting areas as indicated on the Masterplan, as well as the house sites. The Policy and the Masterplan are consistent with one another.

⁴ Paragraph 2.3 rebuttal evidence of G Lister, dated 22 August 2025

⁵ Paragraph 2.11, rebuttal evidence of V Lala, dated 25 August 2025

Neither the plan identified as the Proposed Precinct Plan included in Mr Lister's rebuttal evidence, nor the plan included in the proposed provisions provided by Mr Lala depicts the required ecological planting areas.

I remain of the opinion that it would be helpful if the Precinct Plan did illustrate the required ecological planting areas.

Building Footprint and Height Standards

Mr Lister's rebuttal evidence and the changes to the proposed provisions have resolved my concerns with respect to these matters.

MATTERS ON WHICH MR LISTER & I DO NOT AGREE

The only matter where Mr Lister and I do not agree is with respect to colour.

In my opinion, no justification has been provided for a different standard for building colour to apply at The Landing, than applies in other areas of the Coastal Environment or Outstanding Natural Landscapes (CE-S2 and NFL-S2).

Constraining colours to the greyer Groups A, B and C of the BS5252 colour range is more appropriate than relying on references to "*hue and tone derived from the colours and textures of The Landing's flora and landscape*" in my opinion. Such colours could include the yellow of kowhai flowers (*Sophora microphylla*) or the white of puawhananga (*Clematis paniculata*). Neither of these colours would be appropriate in an ONL or sensitive coastal environment, in my view.

Mr Lister correctly points out that the two colours referenced in my memo of 6 July 2025 both exceed the 30% reflectivity standard, which he agrees is an appropriate control. This was an error on my part, for which I apologise. It would have perhaps been better to reference:



Guardsman Red
04 E 53
RV15

This relatively bright red, which could also be likened to pohutukawa flowers, has a reflectance value of only 15%, but would nevertheless, stand out and could be visually striking. I remain of the opinion that constraining colours to the greyer groups is appropriate at The Landing, just as it is in ONLs and the Coastal Environment.

CONCLUSIONS

The following matters remain unresolved, from my perspective:

- Explanation of why no house sites are identified on Lots 17 and 25;
- Confirmation that the Lot numbers on the Precinct Plan are from 2005;
- Confirmation that residential development on Lots 26-45 would be considered as a restricted discretionary activity; and
- Inclusion of the ecological planting areas on the Precinct Plan

Mr Lister and I do not agree on the appropriate standard for colours on buildings.



REGISTERED
LANDSCAPE
ARCHITECT

Melean Absolum
Dip LA FNZILA
31 August 2025