

**BEFORE THE COMMISSIONERS APPOINTED ON BEHALF OF
OTAGO REGIONAL COUNCIL**

Under	The Resource Management Act 1991 (the Act)
In the Matter	of an application to alter and extend existing structures and to occupy the common marine and coastal area (RM22.550)
Between	ONUMAI ENTERPRISES LIMITED Applicant
And	OTAGO REGIONAL COUNCIL Respondent

BRIEF OF EVIDENCE OF MIKE MOORE (LANDSCAPE ARCHITECT)

DATED 26 AUGUST 2025



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Introduction

1. My full name is Michael William (Mike) Moore.
2. I am Principal of Mike Moore Landscape Architects, a Dunedin based consultancy and have been in my current position since 1994. Prior to this I was employed as a Landscape Architect at Palmerston North and Dunedin City Councils.
3. I have a Bachelor of Science degree (BSc) in Geography from University of Canterbury (1983), a Post Graduate Diploma in Landscape Architecture (DipLA) from Lincoln University (1985), and a Master of Regional Resource Planning (MRRP) from University of Otago (2005). I am a registered member of the New Zealand Institute of Landscape Architects (NZILA).
4. My work involves both landscape design and planning and has had a particular emphasis on landscape assessment since I started my own practice. I have prepared numerous natural character, landscape and visual assessments on plan changes and projects of various scales and character around New Zealand, including dwellings, subdivisions, port expansions, wind farms, cycle trails, mines, river bank and coastal protection structures, and hydro-electric developments. I have also been involved in natural character and landscape assessment work for Councils to assist with the development of District and Regional planning provisions, in particular, Dunedin, Clutha and Gore District Plans, as well as a coastal natural character and landscape assessment study for the Otago Regional Council.
5. Although this is not an Environment Court hearing, I have read and agree to comply with the Code of Conduct for Expert Witnesses

(Environment Court Practice Note 2023). I confirm that the opinions that I express in this evidence are on matters within my expertise.

Scope of evidence

6. My evidence addresses the effects of the building proposed by Onumai Enterprises at 21 Marine Parade, Taieri Mouth on natural character and landscape values. It is structured as follows:

- Background
- Landscape description
- The proposed development
- Natural character assessment
- Landscape assessment
- Response to the landscape assessment peer review
- Comment on relevant submissions
- Comment on the Council Officers Section 42A report
- Conclusion

7. An A3 graphic supplement containing Figures 1 - 15 forms part of my evidence.

Background

8. My involvement with this project commenced in 2022 when I was asked by the applicants to prepare a natural character and landscape

effects assessment of the proposed building. This was in response to a request for further information from Otago Regional Council. I visited the site in December 2022, and my report was completed in January 2023. This report forms part of the application documentation. My assessment follows the concepts and principles outlined in Te Tangi a te Manu - the New Zealand Institute of Landscape Architects (NZILA) Best practice guidelines¹.

Landscape description

9. As illustrated in **Figure 1**, the site is on the true right bank of the Taieri River at Taieri Mouth, within a small node of fishing wharfs at the northern end of the Taieri Mouth settlement. The river in this area is tidal and estuarine and is within the coastal environment. The river emerges from its lower gorge at this point and the landform adjacent to the site rises steeply. The Taieri Mouth settlement lies largely to the south of the river but there are dwellings on both sides of the river which overlook the site, as well as an enclave of cribs upstream from the bridge. The river mouth character is modified by the port area and the Taieri Mouth township but upstream, within the gorge, natural character is strongly expressed. The Taieri Mouth township has an informal beach / crib settlement character with generally modestly scaled dwellings of various ages and style, up to 3 stories in height, and no footpaths.

10. The immediate context of the site is the area of wharves and fishing industry sheds which occupy an approximately 200m stretch of riverbank directly adjacent to Marine Parade downstream of the bridge. In this area, Marine Parade is located on reclaimed land and the adjacent cliffs are modified by blasting to source the rock for this reclamation. The wharf and shed structures are the legacy of a once flourishing fishing industry which operated out of Taieri Mouth, but

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

which is now almost entirely ceased. Their usage now is now mainly associated with recreational boating and fishing.

11. The wharves are typically relatively short timber structures, and the associated buildings are of modest scale, generally no more than approximately 45m² on floor area and 4m in height. The buildings are generally located on the land / water interface and rectangular in footprint with flat or mono-pitch roofs. Some are essentially repurposed containers, and where present, windows are generally small. Materials are typically metal or timber and colour finishes include white, browns, greys and greens.
12. As well as the wharves and buildings there are mooring piles, slipways, containers, fuel and water tanks, and scattered fishing gear. There are often vessels tied up at the wharves, some of which are clearly designed for recreational rather than commercial fishing usage. The area has a utilitarian, rather scruffy and dilapidated small-scale fishing port character. Some of the wharves are fenced off from public access.
13. The site itself is within the coastal marine area (CMA) and is currently occupied by an existing wharf structure, on which are located two cool sheds and a lean-to storage area. There is also a floating pontoon attached to the wharf. The structures on the wharf read as two small sheds, approximately 8 x 2.5m and 4 x 2.5m in area respectively, and both are approximately 3m in height. There is a tank situated on the roof of the smaller shed, and access to the wharf is blocked by a wire mesh gate.
14. **Figures 2 - 10** illustrate the character of the site and its wider landscape contexts.

The proposed development

15. The proposed development involves recognition of a change in the usage of the wharf from a commercial fishing focus to a recreational and accommodation one. There will be no change to the wharf structure itself, except that an additional access ramp will run along the northern side of the proposed boat shed involving an addition of approximately 7.2m² coverage of the seabed. No new disturbance to the seabed is envisaged.
16. The existing structures will be incorporated into a new building which will be 9.64 x 8.66m (approx. 83.5m²) in floor area and 5.9m in height. The roof is to be clad with Ebony (black) coloured aluminum corrugate and the walls are to be clad with 'linea' weatherboard, coloured 'Baltic Sea' (dark grey). The western / road facing façade will be largely devoid of windows and will provide access to the building via a double sliding door. The side (north and south) elevations will have some windows as well as two skylights to either side, whilst the eastern (river facing) façade will be entirely glazed, it is proposed that the majority of the glazing be grey tinted to reduce light reflectance and light bleed.
17. Since I prepared my 2023 report and in response to comments by ORC consultant landscape architect, the applicant has amended the design to include greater eave overhangs to create depth and shadow to the facades, and slats to reduce the impact of glazing on the river facing building façade.
18. **Figure 11** illustrates the proposed development as now proposed.

Natural character assessment

Definitions

19. The NZILA Landscape Assessment Guidelines define natural character as:

*'An area's distinct combination of natural characteristics and qualities, including degree of naturalness.'*²

20. Natural character assessment is distinct from landscape assessment and includes consideration of both biophysical and human experiential attributes. It addresses the effects of the proposed activity on the biophysical integrity and natural processes of the areas affected, as well as sensory / experiential effects on perceptions of natural character. The significance of natural character effects is determined with reference to the degree of existing modification and the sensitivity of the existing environment to change, and the scale and nature of the proposed development.

The key issues arising from the statutory provisions

21. **Appendix A** outlines the statutory provisions relevant to natural character in this case. I consider that the key issue relevant to the effects of this application on natural character can be stated as follows:

- *Is the site within an area of the coastal environment which has outstanding natural character and if so, does it avoid adverse effects on natural character? If not, are significant adverse effects avoided and any other adverse effects avoided, remedied or mitigated?*

² Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. April 2021

Natural character attributes

22. In the Otago Regional Plan: Coast (ORPC), the site is located within a Coastal Development Area (CDA). CDA's are described in Section 2.2 of the Plan as '*characterised by having a mixture of structures, facilities and associated infrastructure required by the recreational and commercial activities occurring in those areas*'. The 'values' listed for CDA 5 Taieri Mouth are 'fishing facilities' and 'recreational facilities'.

23. In the Clutha District Coastal Natural Character and Landscape Assessment³, the site was included within the Taieri Mouth Natural Character Assessment Unit (encompassing the river mouth below the bridge and the area of the Taieri Mouth settlement) and was rated 'medium' for natural character. The overall comment relevant to this assessment unit was:

'Modification of the geomorphological, hydrological and ecological systems is evident as a result of human activity. Moderately low perceptual naturalness but some wild and scenic quality.'

24. Natural character in the Taieri Mouth area is expressed through the presence and powerful natural processes of the river and the ocean, and the largely natural coastal landforms. It is clearly modified though, by the buildings and exotic plantings of the township, the port elements, the roads, and the bridge. More subtly, marram has modified the coastal dunes.

25. In the immediate context of the site (the port and boat launching area), natural character is significantly modified by areas of reclamation and rock protection, the road and modified cliff face, the wharf and shed structures, and the presence of moored vessels. The site is not within

³ Moore et al, 2015, Coastal Environment of Otago, Natural character and outstanding natural features and landscapes assessment, Clutha District Section Report, Otago Regional Council.

an area of high or outstanding natural character. I rate natural character within the Taieri Mouth Coastal Development Area (CDA5) as low.

Natural character effects

26. The proposed building will have no impact on natural river / coastal processes as no change is planned to the wharf piles and there will be no seabed disturbance. The built form on the wharf will change, however, from essentially two small structures, to one larger one, involving an approximately four-fold increase in bulk. The change in character from a fishing industry related facility to a recreational / accommodation facility will have no impact on natural character per se.
27. In that there will be greater scale and impact of built form, I consider that the nature of the effect of the proposed building on natural character will be adverse. I assess the degree of this effect as very low however, because the area is already highly modified and therefore not highly sensitive to change of this nature, and because in the context of the existing built elements, the proposed increase in built impact will be small. Overall, then, it is my assessment that natural character effects will be adverse / very low (less than minor).

Natural character assessment conclusions

28. Taieri River mouth is not coastal environment with high or outstanding natural character. The proposed building will have effects on natural character that are adverse / very low (less than minor). These relate to the greater scale and impact of built form. There will be no effects of any significance on natural coastal processes.

Landscape assessment

Definitions

29. Landscape and landscape values are defined as follows in the NZILA Landscape Assessment Guidelines⁴:

'Landscape embodies the relationship between people and place. It is the character of an area, how the area is experienced and perceived, and the meanings associated with it'.

Landscape values are *'The reasons a landscape is valued. Values are embodied in certain attributes'.*

Landscape effects are defined as *'An adverse or positive outcome for a landscape value as a consequence of changes to a landscape's physical attributes'.*

The key issues arising from the statutory provisions

30. Appendix A outlines the statutory provisions relevant to landscape effects in this case. I consider that the key issues relevant to the effects of this application on landscape values can be stated as follows:

- *Is the site within an area of the coastal environment which is an outstanding natural feature or an outstanding natural landscape and if so, does it avoid adverse effects? If not, are significant adverse effects avoided and any other adverse effects avoided, remedied or mitigated?*
- *Should the existing character of the area be maintained or is this an area where change in character would be acceptable?*

⁴ Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

- *Does the proposed development acceptably maintain or enhance amenity values and environmental quality? Does it acceptably blend with and minimise visual impact on, the character of the area?*

Landscape values

31. The site is not identified as being within an outstanding natural feature or landscape in Schedule 3.2 of the ORPC. As noted already, the port area is identified in Schedule 2.2 of the ORPC as a Coastal Development Area (CDA). The 'values within the Coastal Marine Area' listed in the schedule are 'fishing facilities' and 'recreation facilities'. I interpret these as direction on the activities that the CDA is identified to provide for and do not consider that they can be interpreted as 'landscape values'. The most that can be said in terms of landscape matters is that they provide guidance on the activities underpinning the landscape character.

32. In the Clutha District Coastal Natural Character and Landscape Assessment⁵, the site is within the Taieri Mouth Landscape Character unit (encompassing the river mouth below the bridge and the area of the Taieri Mouth settlement) and this unit was assessed as having medium-high landscape values. The summary comment reads:

The Taieri Mouth unit has some features of significant natural science value and also has some very significant cultural values. Aesthetically, its values are more modest due to a rather sporadic and sprawling settlement pattern.'

33. As noted here, the wider Taieri Mouth area has features of biophysical and cultural / historic significance, for example Moturata Island, wetlands, and tangata whenua settlement and mahinga kai sites. The

⁵ Moore et al, 2015, Coastal Environment of Otago, Natural character and outstanding natural features and landscapes assessment, Clutha District Section Report, Otago Regional Council.

river mouth is also an area valued generally for its recreational opportunities. Generally, however, the perceptual values are more modest.

34. As regards the immediate site context, the port area with its moored boats, wharves and small sheds is aesthetically 'scruffy' with a run-down character. Its fixed elements (wharves / sheds) are reflective of the now largely ceased commercial fishing industry but some of the boats present more recently have a recreational character.
35. In common with all port areas, the interplay of the natural river with the boats and structures is visually interesting and the area is of interest in terms of the history of the settlement, but natural landscape and associated amenity values (pleasantness / aesthetic coherence) are only moderate. The buildings are small scale, of low quality with a utilitarian character, and create an effect of light industrial clutter along the riverbank. This is augmented where there are piles of fishing equipment.
36. I assess the area as having a distinctive but run-down character, and not one with high amenity value. The commercial activity most important in underpinning its current form are clearly in decline or ceased, and I consider this to be an area where an appropriately sensitive change in character is acceptable.

Effects on landscape values

37. The proposed building will introduce a larger permanent structure to the port area, which will have a noticeably different character and purpose to the existing sheds (i.e. recreational / accommodation vs commercial fishing). To an extent, the changing character (commercial fishing to recreational) is already occurring with the changing character of the boats moored.

38. **Appendix B** contains my assessments of the visual effects of the proposed boatshed from representative viewpoints in the area surrounding and **Figures 12 - 14** are photo-simulations illustrating the scale and character of the proposed building from three locations. **Appendix C** outlines the method adopted in preparing the photo-simulations.
39. I conclude that the proposed building will integrate acceptably in this setting for the reasons outlined below:
- (a) In character, it will clearly relate to its waterfront site, orientating to the water and jetty and providing for access to these.
 - (b) As outlined in the Architects Statement (see **Appendix D**) the inspiration for the building is a 'traditional boat shed' which typically have simple gabled forms. **Figure 15** showing various boat sheds from around the shores of Otago Harbour illustrates this point.
 - (c) Whilst the scale of the building will make it the largest structure within the port area currently, it will still be a moderately scaled structure within the range of boatsheds generally. The moderate scale is responsive to the uses proposed, including use for public events.
 - (d) Its form will deviate from the flat or mono-pitched roofed structures currently present in the port area, but in my assessment, this is not a negative feature. Its form will be an aesthetically pleasing typical / classic gabled boatshed form. The change from the current two smaller structures of disparate form and colour to one larger one will reduce clutter and will enhance the area.

- (e) The corrugated metal and weatherboard materials are consistent with the character of existing buildings in the port area and with boat sheds generically.
 - (f) The proposed dark colour scheme will assist to minimise its visual prominence, especially as seen in more distant views.
 - (g) The elevations visible from Marine Parade, providing the closest viewpoints, do not have large areas of window and the sliding doors and porthole window on the road facing elevation provide a boat shed character.
40. In character the building will be a deviation from the commercial fishing related sheds. Its recreational / accommodation purpose will be suggested by the glazing on the river façade and to a lesser extent by the skylights and south elevation window. When occupied, night lighting will also indicate residential use and will have a domestic character compared with more industrial / brighter lighting that might be associated with commercial fishing activity. When used for accommodation purposes the extent of parked vehicles and the degree of activity of people around the structure or on the jetty is unlikely to be significantly different than for what might occur for commercial fishing or recreation uses. Parking related to public events may be greater but this would not be unexpected.
41. Whilst the proposed structure will result in a degree of change to the existing port area character, it is my assessment that there is nothing so special about the existing character as to make sensitive change inappropriate. The current landscape character of the port area reflects historic activity that is no longer economically viable. I see no issue with the sensitive evolution of the character of the area to respond to current demands.

42. As outlined, I consider that the proposed building has features that provide for appropriate integration. The building will still express a recreational function and will have a nautical / boat shed character to a large degree. Boat sheds with partial residential character are not unusual around the country generally. Many of the boat sheds shown in Figure 15 are clearly designed primarily for short term stays and enjoyment of the harbourside setting rather than boat storage or servicing.
43. Overall, I consider that effects on landscape values will be positive / low (minor).

Landscape assessment conclusion

44. Taieri River mouth is not an area of the coastal environment with outstanding landscape values, and it is my assessment that the landscape values of the Coastal Development Area are not such as to make sensitive change to its character inappropriate. I consider that the proposed building is sensitive to its site and will have effects on landscape values that are positive to a minor degree. Whilst the proposed development will modify the existing port character to a small degree, it involves the evolution of the port area responsive to current needs and in a way that results in enhanced environmental quality and amenity.

Response to the landscape assessment peer review

45. My interpretation of the most significant conclusions of Ms Annan's assessment as expressed in her statement of evidence dated 7 August 2025, are:

- (a) The site is not within an area of high or outstanding natural character⁶ and the application will have very low adverse effects on natural character.⁷
- (b) The overall rating of landscape effects is adverse / minor.⁸

I agree with her conclusion regarding natural character. Whilst I disagree with her conclusion regarding landscape effects (considering them as positive) I note that an adverse / minor assessment does not constitute a major disagreement. Below, I address what I interpret to be the main issues raised in her evidence.

- 46. My interpretation is that Ms Annan finds there to be landscape values of some significance (worthy of protection) associated with the port character of the site and its immediate setting. She describes this character as being based on the interaction of the *'boating and recreation'* built elements and the natural environment.⁹ In paragraphs 14 and 20 she refers to *'legible coherence to the existing wharf row and the structures on them'*, and their *'repetitive scale and utilitarian appearance'*.
- 47. I agree that the port area has a distinct character based on small scale, low value commercial fishing structures. It is presently run-down and reflective of a now largely ceased commercial fishing industry. Other terms to describe the area could include 'scruffy', 'unkempt', 'clutter', 'informal'. The buildings in the area are sheds and not 'built to last'.
- 48. The area has no statutory heritage or landscape recognition, and I do not consider that the 'values within the coastal marine area' noted in ORPC Schedule 2.2 should be interpreted as landscape values as such. New activity consistent with these 'values' could include fishing

⁶ Evidence of Rachael Annan para 26

⁷ Evidence of Rachael Annan para 38

⁸ Evidence of Rachael Annan para 58

⁹ Evidence of Rachael Annan para 55

or recreation related buildings of significant scale, for example, that could be entirely out of character with the current small-scale environment.

49. In paragraph 56 of Ms Annan's evidence the landscape report is accused of having a '*narrowed assessment focus on amenity and natural character*', not addressing '*relevant landscape attributes, character and capacity*', and '*misdirection in assessing both recreational and residential activity as if comparative new uses*'.
50. I consider that the focus of the landscape report assessment appropriately addresses the relevant issues arising from the statutory framework, which are the effects of the proposed development on natural character and landscape values, including visual amenity. In my opinion, Ms Annan overstates the landscape values of the port area / Taieri Mouth Coastal Development Area 5..
51. A major concern evident in Ms Annan's evidence is what she refers to in paragraph 8 as the '*shift in landscape character afforded by the proposal and the associated visual amenity effects ...*'. In paragraph 33 she states that '*There are key characteristics of boatsheds which are not successfully met. These include scale, proportion, repetition and simple materiality*'. In paragraphs 46 and 47 she states her key concern as the '*domestic appearance*' of the proposed building expressed by '*the combined changes in materiality*' (particularly *glazing*), '*increased detailing, and the increased height and proportions of the proposed built form relative to adjacent structures*'. In paragraph 50 she states that '*Greater consistency with the identifiable character and proportion of a boatshed would more appropriately reference the character and values of local boating and recreational water use*' and '*better integrate with the existing repetitive form and scale of structures ...*'.

52. I agree that the proposed building involves a change in the character of the port area, referencing a degree of domestic usage. I differ from Ms Annan in seeing this as a significant issue. The existing form and character of the port area relates primarily to an activity (commercial fishing) that has essentially ceased, and the landscape values of the area are of no recognised significance. I do not consider that an evolution of the character of the area, still related to boating and riverside recreation and enjoyment as proposed, is inappropriate. I note that (as shown in Figure 15) the character of many boatsheds reflect recreational accommodation as a significant use.
53. I disagree that the proposed building does not appropriately reference boatshed character. To illustrate, the boatsheds shown in Figure 15 show that gabled forms, considerable glazing, use of timber and metal cladding, and special detailing are all common. Overall scale and height vary in response to the uses provided for and there are certainly boat sheds larger and higher than the building proposed. Colour finishes are sometime flamboyant and, in my opinion, depending on the setting, this can be a significant positive aesthetically.
54. Ms Annan appears to want the structure to be much smaller and boxy in form to blend with the scale and form of the surrounding buildings. In my assessment the proposed larger gabled form proposed provides for a much more attractive waterside building more akin to classic boatsheds than the existing commercial fishing related sheds.

Comment on relevant submissions

55. Differing views are expressed in the submissions regarding the effects of the proposed building on landscape values. Below, I comment on the key issues raised:

The character / heritage values of the area

56. Some submitters¹⁰ stress the value they place on the character and rustic charm associated with the fishing heritage of the port / wharves area, with some noting that its location at the entrance to the Taieri Mouth village gives in particular significance. Others¹¹ describe the area in terms including 'eyesore', 'dilapidated', 'unkempt', 'unattractive', and 'rundown'.
57. I note that there is no natural character, landscape or heritage value recognition in the statutory documents. As already discussed, the 'values within the Coastal Marine Area' in Schedule 2.2 of the ORPC relate to the activities provided for and do not confer landscape values as such.
58. In my assessment submitters in opposition and support both make relevant points. The area is rundown and expresses an industry in decline, but which was an important part of the history of the settlement. I consider that the present character of the area does not have landscape values of such significance that its preservation is required. Instead, it is my assessment that sensitive new development responsive to the evolving uses of the area is appropriate and a way to revitalise this part of Taieri Mouth. I consider that the proposed development is sensitive to natural character and landscape values.

The character, scale and design of the proposed building

59. Whilst many submitters¹² see the proposed building as an enhancement to the area, some have described the proposed building as 'imposing', 'higher than a normal house', and too large in scale to

¹⁰ Including J Bywater, S Keith, B & G King, R & A Moore, E Lukeman, L Hardy, and A Dunlop

¹¹ For example, submissions of C Knight, B de Bono, S Barkman

¹² Submissions of C Knight, B de Bono, L & J Farmer, K Fiddes, G Fitzgerald & F Scott

integrate in this setting. Not being within the scale range of the existing buildings in the port area is seen as making it inappropriate. Some submitters consider that it will inappropriately block river, river bar and beach views. The lack of a visual simulation is criticised¹³.

60. In response, Figures 12 - 14. are photo-simulations that have been prepared to illustrate the proposed building within the setting of the other port structures. I consider that these show that whilst it will be the largest structure present, the building is not inappropriately large and will fit in acceptably. 5.9m is not unduly high and its gabled form and dark colour helps to minimise visual prominence and to blend it with the landform backdrop as seen from some viewpoints.
61. I accept that from the river side the proposed degree of glazing will give it a character that expresses a degree of residential usage, but this is a feature of many boat sheds. The building will also have a classic boat shed character, particularly from Marine Parade. In my opinion its design is responsive to the riverside location and its proposed recreational and public event (as well as intermittent residential) functions, and it will integrate well and in a way that enhances amenity and local character. Considering the very small percentage increase in the overall bulk of built form generally within the port area between Marine Parade and the river that will be associated with the proposed building, effects on blocking views of road users will be minimal.

Effects of light pollution, glare and additional parked cars

62. Some submitters in opposition¹⁴ are concerned about light pollution, glare associated with the glazing, and the amenity effects associated with parked cars relating to use of the proposed building.

¹³ For example, submissions of S Keith, D Hunter, B & G King, R & A Moore, E Lukeman, L Hardy, J Basquin, and A Dunlop

¹⁴ Submissions of S Keith, L Hardy, and A Dunlop

63. As noted in the Architects Statement (see **Appendix D**) slats to semi screen the upper-level glazing on the river facing façade of the building as well as dark tinted glass are proposed to mitigate adverse effects of internal building light emissions on dark sky values and to minimise glare effects.

Comment on the Council Officers Section 42A report

64. In sections 6.3.1 and 6.3.7.2 of her report, addressing the New Zealand Coastal Policy Statement 2010 (NZCPS) and Otago Regional Policy Statement 2021 (ORPS 2021), Ms McDonald states that *‘the proposed introduction of residential activity into the setting is not considered to be appropriately integrated with the location; hence natural character is not preserved’*.
65. I find this statement puzzling. Natural character in the Taieri Mouth Coastal Development Area is already highly modified by port structures. The proposal involves no additional disturbance to the seabed or biophysical processes and whether the buildings express domestic, recreational or commercial fishing usage makes no difference to natural character. The area remains highly modified, and I consider the logic here flawed. I note, however, that Ms McDonald considers that the proposal is consistent with NZCPS Policy 13).
66. Likewise, in the same sections, Ms McDonald notes that *‘adverse effects on landscape values are assessed as minor’* and states that *‘the residual minor adverse effects on landscape values renders the proposal inconsistent’* with NZCPS Policy 15’ and ORPS 2021 CE-P6.
67. I disagree with this conclusion on the basis that I consider the effects of the proposal as positive. I note, however, that in concluding her discussion of the landscape, natural character, and visual amenity effects in section 6.1.2.4 of her report, Ms McDonald states that

'adverse landscape effects can be managed such that they are minor and acceptable'.

Conclusion

68. My key conclusions are as follows:

- (a) Taieri River mouth is not coastal environment with high or outstanding natural character. The proposed boatshed will have effects on natural character that are adverse / very low (less than minor). These relate to the greater scale and impact of built form. There will be no effects on any significance on natural coastal processes.
- (b) Taieri River mouth is not an area of the coastal environment with outstanding landscape values, and it is my assessment that the landscape values of the Coastal Development Area are not such as to make sensitive change to its character inappropriate. I consider that the proposed building is sensitive to its site and will have effects on landscape values that are positive to a minor degree. Whilst the proposed development will modify the existing port character to a small degree, it involves the evolution of the area responsive to current needs and in a way that results in enhanced environmental quality and amenity.

Dated 26 August 2025

M Moore

Appendix A

Statutory Provisions relevant to natural character and landscape effects of the proposed activity at 21 Marine Parade, Taieri Mouth

Resource Management Act 1991

6. Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) The preservation of the natural character of the coastal environment (including the coastal marine area) ... and the protection of them from inappropriate subdivision, use, and development.*

7. Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to –

- (c) The maintenance and enhancement of amenity values:*
- (f) Maintenance and enhancement of the quality of the environment:*

New Zealand Coastal Policy Statement 2010

Policy 6 Activities in the coastal environment

- (1) In relation to the coastal environment: ...*

- f) consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable;...*
- i) set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment;...*

Policy 13 Preservation of natural character

(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:

- a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and*
- b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;*

Policy 15 Natural features and natural landscapes

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:

- a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and*
- b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; ...*

Proposed Otago Regional Policy Statement 2021

CE-O3 – Natural character, features and landscapes

Areas of natural character are preserved and natural features and landscapes (including seascapes) within the coastal environment are protected from inappropriate activities, and restoration is encouraged where the values of these areas have been compromised.

CE-P4 – Natural character

Identify, preserve and restore the natural character of the coastal environment by: ...

(2) avoiding adverse effects on natural character in areas identified as having outstanding natural character,

(3) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects on natural character outside the areas in (2) above, ...

CE-P6 – Natural features and landscapes (including seascapes)

Protect natural features and landscapes (including seascapes) in the coastal environment by: ...

(2) avoiding adverse effects of activities on outstanding natural features and landscapes (including seascapes),

(3) avoiding significant adverse effects and avoiding, remedying, or mitigating other adverse effects of activities on other natural features and natural landscapes (including seascapes), ...

Regional Plan: Coast for Otago

Objective 5.3.1

To provide for the use and development of Otago's coastal marine area while maintaining or enhancing its natural character, outstanding natural features and landscapes, and its ecosystem, amenity, cultural and historical values.

Policy 5.4.4

Regard will be given to the need to provide for the values associated with any coastal development area when considering the use, development and protection of Otago's coastal marine area.

Policy 5.4.11

To have particular regard to the:

(a) Amenity values;

(b) Cultural values;

(c) Scenic values;

(d) Ecological values; and

(e) Historical values, including those identified in Schedule 8; associated with Otago's coastal marine area when considering its subdivision, use or development.

Objective 8.3.2

To preserve the natural character of Otago's coastal marine area as far as practicable from the adverse effects associated with structures.

Policy 8.4.3

To recognise and have regard for the values and uses associated with coastal development areas and coastal harbourside areas when considering activities involving structures in and adjacent to coastal development areas and coastal harbourside areas.

Policy 8.4.5

New and existing structures will be required to be maintained in a structurally sound and tidy state, and should blend as far as is practicable with the adjoining landscape to minimise the visual impact of that structure on the character of the area.

Appendix B: Visual effects Assessment

Viewpoints to the west of the site (see Figures 2 - 4)

<i>Viewpoints description</i>	<i>Significant viewpoints to the west of the site are largely limited to those on Marine Parade, including directly adjacent to the site.</i>
<i>Existing view description</i>	<i>The wharves, sheds and boats form a lineal feature for an approximately 200m stretch along Marine Parade between the road and the river. A rocky cliff face rises from the other side of the road. The small scale, utilitarian, fishing industry structures (and associated clutter of fishing gear) are of some interest but do not contribute to natural character or aesthetic coherence.</i>
<i>Description of visual effects of the building</i>	<i>The proposed building will be significantly larger in scale than the existing structures in this area and will introduce a gabled form in a context where buildings are currently lean-to or flat roofed. It will also differ from the existing character in that the skylights and windows will reflect residential usage and the aesthetic will be newer and smarter. From this viewing angle, its different usage and character will not be starkly obvious as the largely blank road facing facade will retain a boatshed character to a large extent. The proposed black / dark grey colour scheme of the proposed structure will differ from the largely lighter colours of the existing structures but will help minimise its visual prominence.</i>
<i>Nature / degree of effects on landscape values</i>	<p><i>Positive / low</i></p> <p><i>Reasons: The proposed development will deviate to a degree from the current character which expresses a previous commercial fishing industry. The building will</i></p>

	<i>integrate acceptably with the port character but reflect new uses. Aesthetically, it will result in less 'clutter' and will be visually interesting.</i>
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Viewpoints to the north of the site (see Figure 5)

<i>Viewpoints description</i>	<i>The site can be seen from the north from the river and bridge, and the boat launching area on the western side of the bridge.</i>
<i>Existing view description</i>	<i>From this angle, the existing fishing port area is seen in the context of the township dwellings on the south-west bank of the river. The water's edge structures, and moored boats are an element of visual interest and something of a focal point.</i>
<i>Description of visual effects of the building</i>	<i>The proposed building will be seen as one of the riverside structures. It will be within the same alignment as the other buildings but will be different in terms of scale, form, and colour. Its scale will be larger, but the dark colour will assist to minimise its visual impact and it will not appear unduly large or out of character in this setting. Particularly where the river facing glazing is seen, the residential use will be noticeable. Its typical boatshed form will assist to integrate it.</i>
<i>Nature / degree of effects on landscape values</i>	<p><i>Positive / low</i></p> <p><i>Reasons: The proposed development will deviate to a degree from the current character which expresses a previous commercial fishing industry. The building will integrate acceptably with the port character but reflect new uses. Aesthetically, it will result in less 'clutter' and will be visually interesting.</i></p>

Viewpoints to the east of the site (see Figures 6 - 8)

<i>Viewpoints description</i>	<i>Significant viewpoints to the east of the site include the surface of the river, the true-left river margin, Taieri Mouth Road and dwellings accessed from this road.</i>
<i>Existing view description</i>	<i>From this angle, the existing fishing port area is seen in the context of the township dwellings on the south-west bank of the river. The water's edge structures and moored boats are an element of visual interest and something of a focal point.</i>
<i>Description of visual effects of the building</i>	<i>The proposed building will be seen as one of the riverside structures. It will be within the same alignment as the other buildings but will be different in terms of scale, form, and colour. Its scale will be larger, but the dark colour will assist to minimise its visual impact and it will not appear unduly large or out of character in this setting. The residential usage of the building will be evident from the glazing on its river facade. The typical boatshed form will assist to integrate the building.</i>
<i>Nature / degree of effects on landscape values</i>	<p><i>Positive / low</i></p> <p><i>Reasons: The proposed development will deviate to a degree from the current character which expresses a previous commercial fishing industry. The building will integrate acceptably with the port character but reflect new uses. Aesthetically, it will result in less 'clutter' and will be visually interesting.</i></p>

Viewpoints to the south of the site (see Figures 9 and 10)

<i>Viewpoints description</i>	<i>Significant viewpoints to the south of the site include sections of Marine Parade (including the lookout point near the Finlayson Road intersection) and dwellings located on slopes adjacent to the road, as well as Knarston Park.</i>
<i>Existing view description</i>	<i>The existing fishing port is seen upriver from these viewpoints with the bridge and natural gorge landscape beyond. Whilst of visual interest, the port elements also represent 'clutter' that modifies the natural character based aesthetic values of the river landscape to an extent.</i>
<i>Description of visual effects of the building</i>	<i>The proposed building will be seen within the existing port context. From closer viewpoints its different (residential) character and larger scale will contrast to an extent with the other riverside sheds. From more distant viewpoints and where seen with a bush covered hill backdrop (e.g. Knarston Park) its dark colour scheme will be very effective in minimizing its visual prominence.</i>
<i>Nature / degree of effects on landscape values</i>	<p><i>Positive / very low</i></p> <p><i>Reasons: The proposed development will deviate to a degree from the current character which expresses a previous commercial fishing industry. The building will integrate acceptably with the port character but reflect new uses. Aesthetically, it will result in less 'clutter' and will be visually interesting.</i></p>

Appendix C: Photo-simulation method

1. Viewpoints have been selected based on their compatibility with the available building elevation images. The reason for this is that due to systems failure, the architect was unable to provide any other images. This aside, it is considered that the viewpoints illustrated are relevant and provide representations of the visual effects from key angles. The viewpoints are mapped in **Figure 1** (Figures 12 – 14).
2. Photographs from each viewpoint were obtained on 22 December 2022 (Figure 13) and 21 August 2025 (Figures 12 & 14) in clear, sunny conditions near midday. Photographs were taken on a Canon 1000D digital camera (Figure 13) and a Canon EOS 80D digital camera (Figures 21 & 14). The focal length set was 50mm for all panoramas. Photographs have been stitched using 'Lightroom' software to create a panorama which does not exceed the primary horizontal field of human view.
3. An image of the proposed building as viewed from the relevant perspective, was superimposed on the photograph with the location and scale of the structure ascertained with reference to the existing jetty and buildings. This was straight-forward in Figures 12 and 13 but less certain in Figure 14 due to screening of the existing sheds by other landscape elements.
4. A fully rendered photo composite image was produced using 'Photoshop' software and guided by the shading and lighting on the existing buildings.
5. I do not consider the photo-simulations to be 100% consistent with the NZILA Best Practice Guide given the limitations discussed above. I do, however present them as useful guides to be used in conjunction with visits to the viewpoints to assess the visual effects of the proposed building.

Appendix D: Architect's Design Statement

Architectural Design Statement

Bernard Young - Architect

1. This architectural design statement is prepared as part of the RM22.550 application by Onumai Enterprises Limited at Taieri Mouth.
2. I understand that this statement will be appended to the expert landscape evidence of Mike Moore. The purpose of is to explain the design rationale behind the proposed structure to inform the landscape assessment.

Background and Site

3. The current permit for this wharf allows commercial use of the wharf for mooring and unloading fishing boats and storage of fishing and boating equipment. It is my understanding that the fishing industry is generally slowing down in this area and so the current permits are no longer aligned with the current function of the wharves, which is predominantly a mooring and base for recreation activities.
4. The applicants are proposing to restore and upgrade their wharf and align the coastal permit with current and designed future uses. This is also more aligned with the trajectory of Taieri Mouth which is increasingly a recreation and holiday base. At the same time, the project is intended to pay tribute to the rich history of the area, whilst enhancing access to the coast.

Inspiration and consistency with historic character and uses of the area

5. The inspiration for the shell is derived from a traditional boat shed, with a simple gabled form reflective of the historic boat sheds that occupied the area. Equally, the construction techniques and materiality mirror this chapter of New Zealand history.
6. The roadside aesthetic aims to reflect on the commercial nature of this stretch of marine parade. The form is intended to be unassuming so that from the street front it reads as a shed. This project isn't about ego or about making an architectural statement, the aim is to ensure the structure belongs.
7. The proposal is a time capsule bringing new life to a decaying industry that is entrenched in the history of Taieri Mouth. Careful

planning has taken place to make the proposal work for the existing footprint but also recognize the changing tone of the area and the predominant uses that it is put to.

8. I believe that the proposal will succeed in creating a modern, functional structure on the wharf that recognises the heritage of the location while ensuring it blends into the landscape. To this end, dark colours and tinted glazing have been chosen to reduce glare (in contrast to the current structure) while ensuring it is not a dominant feature on the waterfront.
9. A new accessible ramp will be constructed along the north-west side of the building to provide access to the main wharf. The existing pontoon, which has been upgraded, will remain at the south east end of the wharf. The existing commercial fishing station will be restored and repurposed for recreational fishing while the existing commercial fishing crane with winch will remain to aid people with disabilities.
10. Access to the new building will be from the grass verge that adjoins the gravel car park. Two storage areas will also be accessed directly from the grass verge. The western storage area will contain holding tanks for foul waste while the eastern storage area will contain potable water tanks. The unit will be self-contained in this respect with no waste water being discharged to the CMA. Equipment storage will be located where the tanks are in the utility room, for recreational and fishing equipment. In summer a kayak rack will be located on the floating pontoon.
11. The entrance way leads into an open planned living and dining space with attached kitchen. This area can be configured flexibly to serve accommodation purposes, day purposes and as an administration headquarters for event operations etc. Off this central core is a master bedroom and a bunkroom, along with a self-contained bathroom.

Scale of the proposed structure

12. The scale reflects the footprint of the existing structures, containing them within the roof and walls of the proposed building. The Mirams have not sought to expand the footprint of the existing wharf.
13. The proposed building is illustrated on Appendix 1 to the consent application. It will occupy a similar footprint to the existing sheds albeit with the wharf area that currently exists between the two containers to be incorporated within the new building. The building

will be about 1.7m longer but this will be an extension on to the landward side rather than in the coastal area.

14. The new building will be approximately 8.6m by 9.6m (82m²) whereas the current storage sheds are 8.5 by 8m (68m²). The additional area is primarily due to the addition of a wheelchair access ramp on the north western end of the building.
15. The building will have a maximum height of 5.9m at the top of the pitch. The roof will be finished in a dark coloured (ebony) aluminium coloursteel cladding while the walls will be clad in a James Hardies Linea weatherboard to replicate colonial construction. The 'Baltic Sea' colour from Resene Heritage Range has been chosen for the finish, also to reduce glare.
16. The roof pitch reflects other examples of New Zealand historical boat sheds. It is desirable to help natural light reach the back of the structure without requiring more glazing. This enables there to be less windows to the rear of the structure so that we are more in alignment with the shed vernacular, providing a sympathetic street frontage.
17. Proportionally the proposed pitch works well for the footprint and is pleasing to the eye. At a ratio of 8:12 it is considered moderate, making it not too squat or steep.
18. The consequences of lowering the roof pitch would be that less light reaches the back of the structure. The other consequence is that we have proposed exposed trusses to be consistent with the shed vernacular. Exposed Trusses are not well suited to shallow roof pitches. There is potentially some tolerance to lower the pitch slightly remaining consistent with the character of the area and the historic context. It would come with some loss of interior amenity due to reduced light.

Light pollution and glare

19. I understand that some submitters have concerns that the design will lead to light pollution in the area. I am really pleased to see these thoughts raised and it should be asked more in architecture. The design has been conscious of this issue especially given the location at the water's edge.
20. Screening has been provided along with dark tinted glass to reduce light emissions. The philosophy for this build is to be largely self-contained with low embodied energy. This extends to lighting design. Dark sky approved lighting will be specified.

21. I was also worried about light glare when I commenced the design. As per the submissions on light pollution screening is provided along with dark tinting. The tinting will offer a significant reduction in any glare viewed from across the Taieri. The other redeeming factor is that the bulk of the proposed glazing is eastward facing with very little glazing along the Northern façade, meaning as the sun intensity increases the potential for glare decreases.

Overall conclusion

22. My aims with this design were to embody the history of the area in a way that provided for future uses in a changing environment.
23. I hope that others will agree that my design attempts to capture Taieri Mouth's past in a way that pays adequate attention to the very legitimate concerns relating to scale, light pollution and glare.



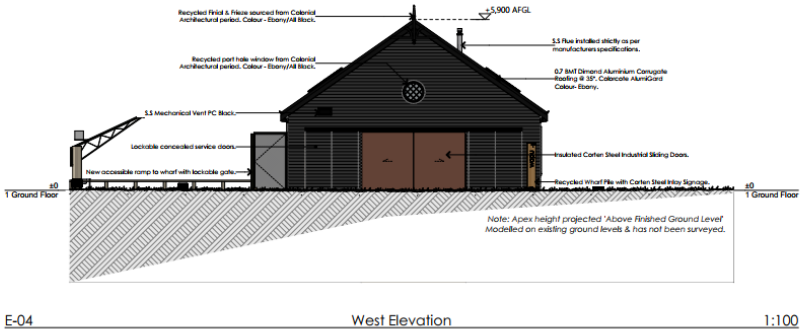
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Perspectives

JOB NO.	2202	A702 SHEET NO.	
DATE	22/07/2022	AMENDMENT	01
RC ISSUE	RC ISSUE	DATE	22/07/2022

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DESIGN	B.Y.	DRAWN	B.Y.
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SCALE	1:100	BOARD	22/07/2022
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Elevations

JOB NO.	2202	A304 SHEET NO.	
DATE	22/07/2022	AMENDMENT	01
RC ISSUE	RC ISSUE	DATE	22/07/2022

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