

**BEFORE A HEARINGS COMMISSIONER APPOINTED
BY THE OTAGO REGIONAL COUNCIL**

IN THE MATTER OF the Resource Management Act 1991 (“the Act” or “the RMA”)
AND

IN THE MATTER OF Onumai Enterprises Coastal Permit Application, RM22.550
21 Marine Parade, Taieri Mouth.

SUPPLEMENTARY EVIDENCE OF RACHAEL ANNAN

ON BEHALF OF OTAGO REGIONAL COUNCIL

10 SEPTEMBER 2025

SUPPLEMENTARY EVIDENCE

- 1 This evidence provides a response to Mr Moore's landscape evidence on behalf of the applicant (31 July 2025). I have focused this response on key matters set out by Mr Moore in his evidence. I have also referenced landscape relevant matters of planning and legal evidence provided on behalf of the applicant, and relevant discussion of the first day of the hearing.

LANDSCAPE MATTERS

- 2 Mr Moore sets out at paragraph 15 of his evidence (26 August) that:

'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.'

- 3 I reiterate that with regards to landscape effects, the *existing* shift from commercial to recreational boating use is not a concern or key matter. They are allied in use and character, such as being as different types of boats.
- 4 It is in bundling together the recreational and accommodation use, that focus is diverted away from the application's predominant shift in character and amenity via introducing an accommodation use building. The wharves are already '*characterised by infrastructure required for recreational **and** commercial use*' (ORPC, Section 2.2 – emphasis added).
- 5 From a landscape assessment perspective, there is also no inherent association between existing recreational use and water access use of the wharves with the proposed accommodation building and activity in this location.
- 6 Mr Moore recognises the location's fishing and recreational facilities values in his evidence (para 22). It is agreed that these activities underpin the existing landscape character (para 31). It is, however, somewhat awkward to disassociate landscape values from related provisions. There is no assessment practice basis, which I am aware of, for this approach. We reference policy for the shared and recognised values it identifies.
- 7 Mr Moore's evidence sets out a relatively involved natural character discussion, despite it being agreed that adverse natural character effects are not a key matter of the application. This pattern is repeated in the planning evidence (para 19, 51, 61).
- 8 As the immediate context of the proposal's receiving environment, the presence of the wharf row (and storage structures upon them) speaks to the relationship of humans with

the water, not the absence of human use and activity from a more pristine environment. The current landscape character reflects historically commercial fishing use *and* existing recreational use and access to the water.

- 9 In response to the legal submission (para 97, 98), there is no inherent follow on from the wharves' needed upkeep, (and that of their structures upon them) to the introduction of occupational use and character. I have not promoted the *preservation* of the location but sought the acceptable integration of an introduced activity.
- 10 Despite the proposed built form being called a boatshed, it will not be used for this purpose. Significant elements of its character including its scale and glazing, draw from its intended occupation, in contrast to adjacent structures (paras 37, 40, 41). There is also no boat ramp. Of the additional graphic supplement Mr Moore has provided with his evidence (Appendix C) I note the following issues:
 - (a) The informal photomontages provide an inaccurate depiction of a glazed façade. Inconsistent with the proposal, they present a muted grey façade addressing the water. The process of the photomontages' preparation described also indicates limited accuracy of scale (over photographs of unspecified focal length).
 - (b) The photographic examples of what appear as mixed-use water edge structures of other Otago Harbour locations, *do not* inherently illustrate an appropriate landscape outcome simply because they exist. They do however, set out more accurately though than the photomontages, a domesticated and privatised character of the water edge.
- 11 Drawing on both my landscape assessment and urban design review experience (with Christchurch City Council), I consider that the accommodation character expressed by the proposed application will give the appearance and perception of privatised space. It would also be reasonably anticipated that future occupants would experience reverse sensitivity to the public use of the wharf outside their lounge, exacerbated by the waterfront façade's extensive glazing.
- 12 The currently unpermitted, and proposed, gated arrangement physically reinforces the perception of privatisation by inhibiting ready open access. There are design opportunities to provide safe accessible facilities which do not preclude public access and the *perception of this* being available.
- 13 Mr Moore sets out that as the '*Taieri River Mouth is not a coastal environment of outstanding natural landscape values*' and that the CDA landscape values '*are not such to make **sensitive change** to its character inappropriate*' (para 44 – emphasis added). I

agree with this. The issue though, is that the application misses the mark, for reasons as I have set out in detail in my primary evidence [paragraphs 47-50].

- 14 I do not disparage the application design in itself; that is not however the whole relevant consideration. In landscape terms, aesthetics or amenity of proposals are not considered in isolation, but with regards to their coherence with their setting. The application, notably for its scale, glazing, and detailing will be inconsistent, incoherent with the character of the wharves setting.
- 15 Earlier in the process, we put forward suggestions to help the applicant finds measures to address key concerns of the glazing and bulk and height of the roof form in this setting. The changes made by the applicant were not sufficiently effective in integrating the application in its setting.
- 16 There are opportunities and alternatives to effectively address issues of comparative built form scale and introduced residential character. One option of an alternative approach is illustrated in the appendices to my primary evidence. This sketch over the application elevation drawing, starkly highlights and contrasts for instance, the issue of the comparative height and bulk of the proposed roof form. I understand from the applicant's hearing discussion that they may already need to redesign the building to exclude existing structures, due to accessibility requirements. Both outcomes should be possible.
- 17 As I noted in my main evidence at paragraph 33, Mr Moore's assessment provided a narrowed focus on landscape relevant policy matters, to the avoidance of values associated with coastal development areas, and activities involving structures.
- 18 With regards to landscape matters, the application does not demonstrate an effective response to either it's physical or policy context; the applicant's landscape architect being engaged subsequent to both the application's design and lodgement.
- 19 What Mr Moore references as '*Enhanced environmental character and amenity*' (para 68), should occur in considered response to the context where it is proposed.

Rachael Annan

10 September 2025