



# Memo

**To:** Laura Galt – Hamilton City Council

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**From:** Will Gumbley – Beca **Date:** 28 November 2025

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**Subject:** Ruakiwi Reservoir Requirement – Technical Specialist Report for Section 42A Reporting

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**Technical Area:** Landscape and Visual Effects

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**Version:** Final

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## Purpose

1. This memorandum has been prepared to provide technical assessment under section 42A of the Resource Management Act 1991 (RMA), in respect of landscape and visual impact in relation to the Ruakiwi Reservoir Alteration to Designation (the Requirement).

## Introduction

2. My name is Will Gumbley. I am an Associate Landscape Architect at Beca. I have the qualifications of Bachelor of Landscape Architecture from Lincoln University and a Master of Urban Design from the University of Auckland, and I am a Registered Member of the New Zealand Institute of Landscape Architects (NZILA).
3. I have practised for 15 years, based in Auckland, Australia and now Tauranga. My experience includes preparing Landscape and Visual Assessments (LVAs) for a wide range of development projects across New Zealand, as well as holding the role of peer reviewer, and appearing as an expert witness at Council hearings. Relevant project examples include assessments for Notices of Requirement (NoRs) for water infrastructure designations and other large-scale infrastructure-related developments.
4. I have no conflicts of interest to declare.

## Code of Conduct

5. I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this memorandum are within my area of expertise except where I state that I have relied on the advice of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

## Scope

6. This memorandum covers the following:
  - a. The environmental effects of allowing the Requirement and whether any such adverse effects will be acceptable.
  - b. Relevant matters raised, and relief sought, in submissions.
  - c. Relevant statutory considerations
  - d. Recommended amendments and/or additions to the Requiring Authority's proposed designation conditions.
7. The scope of this memorandum does not include review of the consideration of alternative sites.

## Executive Summary

8. This memorandum provides a technical review under section 42A of the Resource Management Act 1991 (RMA), focusing on the landscape and visual effects associated with the Ruakiwi Reservoir Alteration to Designation (the Requirement) in Hamilton. The assessment was prepared for Hamilton City Council and is based on a review of the Landscape and Visual Impact Assessment (LVIA) prepared by Adrian Morton Landscape Architects Ltd, a site visit, and analysis of submissions received during the public notification process.
9. The LVIA follows best practice guidelines and applies a robust effects rating scale. Anticipated landscape and visual effects have been appropriately identified, and integrated architectural and landscape features serve as key mitigation and avoidance measures. While the assessment is generally sound, it would benefit from clearer articulation of landscape values and a more explicit comparison with the permitted baseline scenario, which is an important statutory consideration under the RMA.
10. Two submissions raised concerns about visual effects and tree removal. The assessment acknowledges these issues and recommends further site-specific visual assessment and further evaluation of the necessity for tree removal where appropriate.
11. The proposal demonstrates alignment with some statutory and policy requirements, including aspects of the Hamilton Lake Domain Management Plan, and responds positively to heritage context and urban design principles. However, it is not fully consistent with the Hamilton City District Plan. The LVIA considers relevant provisions of the Operative District Plan, including objectives and policies relating to design quality, amenity, and open space values. While the design incorporates measures to improve integration with the surrounding landscape and enhance connectivity, the permanent reduction in open space remains a notable issue and is difficult to reconcile with open space objectives and policies.
12. With the recommended amended designation conditions, integrated design measures, and consideration of permitted baseline comparisons, the effects on landscape and visual amenity are assessed as acceptable and broadly aligned with statutory and policy requirements.

## Documents considered

13. The following documents have been considered in the preparation of this assessment:
- a. Ruakiwi Road Reservoir, Hamilton City, Landscape and Visual Impact Assessment: Draft V1, dated 18 June 2025: Prepared by Adrian Morton Landscape Architects Ltd.
  - b. Ruakiwi Road Reservoir, Hamilton City, Landscape and Visual Impact Assessment: FINAL, dated 11 August 2025: Prepared by Adrian Morton Landscape Architects Ltd.
  - c. Central City Reservoir – Ruakiwi: Notice of Requirement for an Alteration to an existing designation: Final August 2025. Prepared by Bloxam Burnett & Olliver Ltd (BBO).
  - d. Appendix C: Designation Drawings: Prepared by Holmes
  - e. Appendix G: Terrestrial Ecological Impact Assessment (EclA)
  - f. Appendix J: Construction Method Statement: Version 1, 26 June 2025. Prepared by A Stewart.
  - g. Appendix L: Draft Conditions
  - h. Appendix N: Cultural Impact Assessments
  - i. Appendix O: Ruakiwi Road Reservoir, Hamilton City, Landscape and Visual Impact Assessment: Final Report 11 August 2025, and appendices: Prepared by Adrian Morton Landscape Architects Ltd.
  - j. Appendix R: Urban Design Panel Letter: 30 July 2025.
  - k. Ruakiwi Road Reservoir Development Resource Consent – Lighting – Effects Assessment: 14 October 2025. Prepared by LDP Limited
  - l. Hamilton City District Plan.
  - m. Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects. July 2022.
  - n. The Submissions listed in Table 1.

**Table 1 Submissions that raise landscape and visual impact matters**

Number	Submitter
001	Ernest Ross Needham
005	Glenda Morrissey

## Introduction

14. I was commissioned by Hamilton City Council (HCC) to undertake a technical review of the Landscape and Visual Impact Assessment (LVIA) prepared by Adrian Morton, dated 11 August 2025, for the proposed Notice of Requirement (NoR).

15. On 4 August 2025, I attended a site visit alongside representatives from Beca, HCC, BBO, Tonkin & Taylor, Adrian Morton, and Georgina Hailwood. The visit involved a walkover of the immediate site and surrounding area to gain an understanding of the existing environment, the proposed development, and its relationship to the broader landscape context.
16. Prior to the lodgement of the final LVIA as part of the NoR application, I was provided with a draft version (Draft V1) for initial review, comment, and clarification. Following the site visit, I undertook a peer review of the draft LVIA to identify any gaps and assess whether further information was required before final lodgement.
17. I subsequently completed a technical review of the final LVIA submitted with the NoR. This version was publicly notified. My review considered whether the matters raised during the initial review of the draft LVIA had been adequately addressed, and whether the assessment could be relied upon or if further consideration was required. I evaluated the adequacy of the methodology and reporting, and assessed the outcomes of the LVIA against the relevant provisions of the Hamilton City District Plan. My analysis of the Final LVIA is presented below.

## Analysis

### Draft LVIA Review

18. My initial review of the Draft LVIA found that the assessment was generally consistent with NZILA best practice methodology, as outlined in the *Te Tangi a te Manu* landscape guidelines. I advised that further information and clarification were required before the overall effects ratings could be confirmed. This additional information was subsequently incorporated into the final version of the LVIA.
19. In general, the additional information and clarifications requested during the draft review have been satisfactorily incorporated into the Requiring Authority's Final LVIA. This has enabled confirmation of the overall effects ratings. Any remaining gaps in information, or areas where I disagree with the assessment findings, are addressed in the analysis of the Final LVIA, and as summarised in Table 1 below:

#	Draft LVIA further information requested or clarification sought	Final LVIA analysis of responses
1	<p><b>Section 3.2 – Vegetation</b></p> <p>Given its classification, include commentary in the site description about the notable <i>Cupressus lusitanica</i> tree, and similarly, assess the effects on landscape character resulting from its removal.</p>	Limited commentary with respect to removal of notable tree. Incorrect notable tree referenced later in Section 4.6.
2	<p><b>Section 4.3 – Effects on Landscape Character</b></p> <p>Paragraph 3 is difficult to follow. Please consider simplifying the language.</p>	Not addressed. No changes made to the Final LVIA. This omission does not materially affect the conclusions of the LVIA.

3	<p><b>Appendix A – Methodology</b></p> <p>The section mentions cumulative effects, but there is no dedicated discussion of cumulative effects in the main body of the report.</p>	<p>Not provided in Final LVIA. Reference to cumulative effects has been removed from the methodology. Potential cumulative effects discussed in Landscape Character Effects Assessment below.</p>
4	<p><b>Additional Considerations</b></p> <p>Has the proposal considered reusing or recycling timber from the mature trees to be removed? Potential uses could include architectural elements, public art, street furniture, or other applications within the domain.</p>	<p>No comments provided. This omission does not materially affect the conclusions of the LVIA.</p>

## Final LVIA Review

### Introduction

20. As part of my review of the Final LVIA, I undertook a comprehensive assessment of the document, including an evaluation of the methodology, the description of the proposal and existing environment, the assessment of landscape and visual effects, proposed mitigation measures, conclusions, and recommendations. I also considered the outcomes of the assessment in relation to the relevant provisions of the Hamilton City District Plan and the Hamilton Lake Domain Management Plan 2017.

### Methodology

21. The Final LVIA is generally consistent with NZILA best practice methodology, as outlined in the *Te Tangi a te Manu* landscape guidelines<sup>1</sup>. It applies the 7-point effects rating scale and uses effects-based terminology aligned with the Resource Management Act (RMA). A ZTV analysis, confirmed through fieldwork, supports the visual effects assessment by providing a robust basis for identifying viewpoints and viewing audiences.

Cumulative effects are not addressed in the assessment, as noted in Table 1 of the Draft LVIA review. Further commentary on this matter is provided in paragraph 32 below.

### The Proposal

22. The Final LVIA presents a clear and comprehensive overview of the assessment's purpose, the location and nature of the proposal, and relevant project background. It outlines the rationale for the proposed alteration to the designation and summarises the site investigations undertaken. The proposal description, supported by architectural and landscape design drawings, provides sufficient detail to enable an assessment of the proposal and its associated

<sup>1</sup> 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

landscape and visual effects. The inclusion of project staging information, and the construction process, further supports the assessment.

23. Lighting is described as being minimally provided for security and safety purposes, with some feature lighting associated with the corten steel façade. This approach is supported by the Lighting Assessment, which specifies downward-directed lighting at a 2700K colour temperature, operating within a limited time range and triggered by motion sensors. For further detail, refer to the Lighting Assessment Review Memorandum (Beca), which evaluates the lighting assessment.

It is feasible that the lighting design may evolve during detailed design stages, potentially altering night-time effects. If the final design deviates from the parameters outlined in the current assessment, a revised evaluation of night-time effects on natural character should be undertaken for Council approval.

24. The inclusion of a permitted baseline design, based on the existing water reservoir designation and what is feasibly possible under that designation, helps to contextualise the proposed changes and the overall scope of the project. This permitted baseline provides an important reference point and should form the basis for assessing the proposed designation alteration and associated development.

While the permitted baseline is referenced throughout the Assessment of Effects section, the landscape and visual effects ratings appear to be based on a comparison with the existing environment rather than the permitted baseline. Including a comparative effects rating that considers both scenarios would have strengthened the analysis and provided a clearer understanding of the relative impacts of the proposed changes.

#### Existing Environment

25. The Final LVIA provides a detailed description and analysis of the wider landscape, the site, and its immediate surroundings, including land use, landscape attributes, and features that define the character of the Hamilton Domain Reserve and adjoining urban areas. A summary of how these elements influence overall landscape character is also included.
26. While the description and character summary are comprehensive, the assessment does not clearly identify the landscape values expressed through the physical attributes of the site. Establishing these values is an important foundation for assessing landscape effects, as it provides a clear basis for determining whether those values are maintained or mitigated through design integration. Although some values can be inferred from the list of key landscape features, a concise summary of the specific landscape values associated with these features would improve clarity, strengthen the reasoning behind effects ratings, and better support the need for mitigation measures.

#### Landscape Character Effects Assessment

27. I agree with the landscape character effects identified in the LVIA under *Landscape and Visual Effects*. The assessment anticipates moderate-high adverse effects from Stage 1 and moderate adverse effects from Stage 2. On the 7-point Te Tangi a te Manu scale, these equate to a “more than minor” level of effect under the RMA. These ratings are reasonable given the proposal’s substantial scale and vegetation removal within the Hamilton Domain Reserve. The assessment appropriately considers construction-related effects and project staging.

28. The LVIA includes a useful summary table (Table 1) assessing effects on key landscape features. I support the ratings presented, which range from “no effect” to “moderate-high adverse”. These are appropriate and do not understate the proposal’s potential impacts.
29. As previously noted, the landscape character effects assessment does not include comparable effects ratings against the permitted baseline which would be a useful way to demonstrate the relative difference of effect between the permitted baseline and what’s proposed.
30. The LVIA discusses new planting and tree replacement to help maintain the treed character and soften the appearance of the reservoir structure (rather than screen it). However, it does not confirm whether this planting meets the ecological requirements outlined in the EclA<sup>2</sup>, including the provision of 0.58 ha of compensatory planting for bat habitat loss.
31. In Section 4.6, the LVIA appears to incorrectly reference a Notable Tree, identifying a *Sequoia sempervirens* (T280.13) as proposed for removal. However, this tree is located outside the site. The correct reference should be to the *Cupressus lusitanica* (T280.26). Although the wrong tree is named in the report, the correct tree was identified by the LVIA author during the site visit. It is therefore presumed that the commentary stating “...although this is a reasonable specimen it will be removed to accommodate the Stage 1 reservoir” applies to the *Cupressus lusitanica*.

The assessment lacks specific commentary addressing the effects of removing this particular Notable Tree, which should be considered in its own right. However, I consider the Moderate-High effects rating, which reflects the localised impact from tree removal, to be appropriate in covering the loss of this tree.

32. Cumulative effects are not addressed in the Final LVIA, despite being specifically requested in response to the Draft LVIA. The methodology section in the Draft LVIA included a definition and description of cumulative effects, which has since been removed.

Te Tangi a te Manu defines cumulative effects as:

*“Cumulative effects are the effects of a proposal in combination with those of previous developments. This might relate to such things as s127 variations to a resource consent (e.g. further additions to an approved development), expansion of a facility (e.g. shopping mall), intensification of an element of infrastructure (e.g. ‘four-laning’ a two-lane highway), or additional projects of a certain type in an area (e.g. further rural subdivision, wind farms, marine farms).”<sup>3</sup>*

Given the addition of new water infrastructure alongside the existing heritage reservoir, cumulative effects warrant consideration.

Although a dedicated section is absent, I reviewed the LVIA for general references to cumulative effects. The heritage reservoir is considered a positive contributor to landscape character. The LVIA concludes that the proposed reservoirs, along with removal of visual clutter, will improve the setting around the heritage tower compared to the permitted baseline scenario.

<sup>2</sup> Ecological Impact Assessment Report: Central City Reservoir Project. Tonkin & Taylor, August 2025.

<sup>3</sup> Para 6.46, page 153, ‘Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines’, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

While the proposal introduces a substantial increase in reservoir infrastructure, the comparison to the permitted baseline is valid. Therefore, I do not expect cumulative effects to alter the overall conclusions or increase the degree of adverse impact on landscape character.

### Visual Effects Assessment

33. I agree with the visual effects identified in the LVIA. The assessment anticipates effects ranging from no effect and very low adverse to moderate-high adverse, reflecting the variety of viewpoint locations and the differing nature of views. The most significant effects are experienced from nearby Ruakiwi Road and adjacent residential properties east of the site. On the 7-point *Te Tangi a te Manu* scale, this equates to a “more than minor” level of effect under the RMA. These ratings are reasonable given the proposal’s scale and the extent of vegetation removal within the Hamilton Domain Reserve. The assessment also adequately addresses visual effects associated with construction and project staging.
34. The methodology is sound, incorporating ZTV analysis, site investigations, and visual simulations. These tools effectively illustrate the loss of vegetation, increased visibility of the proposed reservoirs, enhanced visibility of the heritage reservoir, and the overall change to the tree canopy pattern and the skyline. The selected viewpoints are representative of publicly accessible locations around Hamilton Lake.
35. The assessment also incorporates Visual Absorption Capability (VAC). While VAC is a recognised concept in landscape assessment, referring to a landscape’s ability to visually absorb change, it is not explicitly referenced in *Te Tangi a te Manu* or related guidance such as the Quality Planning website. Its use is clearly explained in the methodology section (Appendix A of the LVIA). As a supplementary tool, VAC is acceptable in this context, particularly given the Hamilton Domain Reserve setting and the extent of tree cover changes, which influence the environment’s capacity to visually absorb the proposal.
36. As previously noted, the visual effects assessment does not include comparable ratings against the permitted baseline, which would help demonstrate the relative difference between what is enabled and what is proposed. The current assessment focuses on the existing reserve environment with only limited reference to the permitted baseline. A clearer comparison of visual effects from each assessed viewpoint, considering both scenarios, would illustrate whether the proposed reservoir results in lesser or greater impacts on character and amenity, particularly given that the permitted baseline may be more adverse.

### Mitigation

37. The section titled “*Architectural and Landscape Mitigation*” outlines the design features of the architectural and landscape concept. These features are an integrated part of the proposal within the Domain open space, enhancing the relationship with the heritage tower, and minimising the visual impact of the reservoir structures.
38. However, as these elements are fundamental components of the proposed design, they have already been factored into the assessment of landscape and visual effects as avoidance measures. There is no alternative design presented that excludes these features. Therefore, rather than being considered “mitigation,” these should be recognised as integral design features which aim to provide a design outcome which avoids some degree of adverse effects.

### Conclusions and Recommendations

39. The conclusion provides a consolidated summary of the proposal, including its design features and the corresponding assessment of landscape and visual effects.
40. The recommendations support the integration of the architectural and landscape concept design into subsequent design stages. As previously discussed in relation to mitigation, it is assumed that these architectural and landscape features are integral to the proposal and form the basis of the landscape and visual effects assessment, rather than being optional additions.

Additional recommendations identified for development during the detailed design stages are considered appropriate and beneficial.

### **Statutory Considerations**

41. The following considers how the LVIA has addressed the statutory and policy context for the proposed alteration to Designation A67, focusing on its treatment of planning provisions relevant to landscape and visual matters.

#### Designation and Permitted Baseline

42. The site is subject to Designation A67 (Water Reservoir – Ruakiwi Road) under the Hamilton Operative District Plan. The proposed alteration seeks to modify the existing designation to enable a revised reservoir layout and associated infrastructure.

Under the Resource Management Act 1991 (RMA), the permitted baseline can be used to help determine whether the effects of a proposal are materially different from those already anticipated. In this case, the existing designation already enables the construction of a reservoir, so a degree of landscape and visual change is expected. While the proposed configuration differs in form and scale, the permitted baseline provides a useful reference point for assessing whether the additional effects go beyond what is reasonably enabled by the current planning framework.

Although the permitted baseline is referenced throughout the Assessment of Effects and in the conclusions, the landscape and visual effects ratings appear to be based primarily on a comparison with the existing environment. A comparative assessment that considers both the existing environment and the permitted baseline would have strengthened the analysis. This would provide a clearer understanding of the relative impact of the proposed changes and support a more robust conclusion regarding the proposal's overall appropriateness.

#### Hamilton Operative District Plan

43. The proposal has been considered against relevant provisions of the Hamilton Operative District Plan, including objectives and policies that address design quality, amenity, and open space values. While the design includes measures to improve integration with the surrounding landscape and enhance connectivity, the permanent reduction in open space remains a notable issue. This is difficult to reconcile with several key objectives and policies, including:

**Objective 15.2.1:** *Development and activities must complement the functions and values of the particular open space and the surrounding environment.*

**Policy 15.2.1b:** *Buildings and structures shall be designed and sited to be compatible with the function and predominant purpose of the open space.*

**Objective 15.2.3:** *Well-designed and safe open space.*

**Policy 15.2.3b:** *Buildings shall be of a design, bulk and scale that is compatible with the open space and the surrounding environment.*

As noted in the LVIA conclusion, “loss of existing open space to accommodate the built forms will result in a noticeable and permanent change to the useability of the Domain’s open space within the adjacent Project area.” While the proposal includes positive design features and mitigation measures, the fundamental loss of open space cannot be fully offset due to the scale of the reservoir. However, this appears to be appropriately reflected in the LVIA’s effects ratings.

#### Hamilton Lake Domain Management Plan 2017

44. The site is located within the area covered by the Hamilton Lake Domain Management Plan 2017, prepared under the Reserves Act 1977. This plan sets out the purpose and management expectations for the reserve. While the scale and long-term presence of the proposed development challenge the intent of the management plan, the design includes a range of mitigation measures that address its principles and objectives.

These include enhancements to the quality of the remaining open space, recognition of the heritage value of the existing reservoir, improved safety and accessibility, and the avoidance of key active and passive recreation areas. The proposed location aligns with an area already used for infrastructure purposes, and landscape mitigation planting is proposed to address tree loss. While the permanent loss of open space remains an important effect, the measures taken to improve the quality and function of the surrounding area are considered valid and contribute positively to the overall outcome.

#### Urban Design Guidance

45. The LVIA also includes an assessment against the Vista: Hamilton City Design Guide (2007). Although non-statutory, Vista outlines urban design principles that support high-quality development outcomes. Its inclusion in the design process is a positive aspect of the proposal. Additionally, the proposal was reviewed by the Hamilton Urban Design Advisory Panel, which provided generally supportive feedback, noting alignment with key urban design principles and endorsing the overall design direction.

#### **Matters raised in submissions**

Of the 6 submissions HCC received, two raised landscape and visual matters:

##### **Submission 1 – Ernest Ross Needham**

46. The submission opposes the proposed alteration to the designation and reserve classification change, citing concerns that the scale of the proposed reservoir is out of character with the surrounding environment and detracts from the amenity values of the lake and park setting.
47. The submitter raises a valid concern that their property at 1/17 Ruakiwi Road was not included in the visual assessment, despite having a direct, front-facing view toward Reservoir 1. While the viewpoints at 12 and 22 Ruakiwi Road were selected to represent typical views from residential properties and public areas along Ruakiwi Road, they do not fully capture the specific visual effects likely to be experienced from the submitter’s location.
48. Page 7 of the submission includes a snapshot of a new visual simulation titled “*BEFORE AND AFTER VIEWS FROM 17 RUAKIWI ROAD*”, which was not included in the Final LVIA. There is no accompanying description, but Hamilton City Council has advised that the simulation was

taken from within the submitter's property. The image illustrates a direct view across Ruakiwi Road toward Reservoir 1. Given the submitter's proximity and orientation to the proposed reservoir, it is reasonable to expect that visual effects from their property may be equal to or more adverse than those assessed from the selected representative viewpoints.

49. The submitter's concerns regarding changes to outlook, character, and amenity are valid based on the new visual simulation provided. However, when considering the potential effects of the permitted baseline, it should be noted that the permitted reservoir design may result in more adverse visual effects than the current proposal. For completeness and to better understand potential mitigation opportunities, it would be beneficial to include a site-specific visual assessment from the upstairs living area of the submitter's property, subject to the owner's permission, using both existing and permitted baseline scenarios as a basis for evaluation. This would help address the submitter's concerns by providing a transparent comparison of how the proposal affects views relative to what could occur under the permitted baseline.
50. In relation to the submitter's concerns about tree removal, trees 30 and 30a are listed for removal, despite being located outside the footprint of the proposed reservoirs. It is unclear why their removal is necessary. Tree 30 has been assessed as being in "average health," but further justification is required to support its removal.

It is recommended that the removal of these trees be re-evaluated. If their removal is not essential to the construction or operation of the reservoir, consideration should be given to retaining them in situ. If removal is deemed necessary, clear justification should be provided. Advice from the Heritage Consultant should also inform the evaluation of whether these trees should be removed or retained.

#### **Submission 2 – Glenda Morrisey**

51. The submission opposes the proposed change in reserve classification to enable construction of new water reservoirs, citing concerns about site suitability, potential environmental effects, and adverse impacts on the character and amenity of the open space. Specific issues include the loss of vegetation and associated recreational and aesthetic values, as well as inconsistencies with the objectives of the Hamilton Lake Domain Management Plan.
52. The LVIA addresses the issues raised and notes that a permitted baseline exists, under which similar or greater landscape and visual effects could occur. The proposed alteration to the designation seeks to manage potential effects more effectively through integrated landscape and architectural design responses that aim to enhance amenity outcomes.
53. The submission also raises concerns about potential impacts on the heritage values and landmark prominence of the existing reservoir structure. The LVIA acknowledges the significance of this heritage feature and confirms that the proposed design has been developed to respond sensitively to its context. Key design measures include setting the reservoirs back, limiting their height, and using visually recessive materials to avoid competing with the heritage structure. These responses are considered to result in a more sympathetic outcome than what could occur under the permitted baseline. Additionally, the proposed removal of selected vegetation is expected to enhance views of the heritage tower from key locations around Hamilton Lake, which the LVIA identifies as a positive effect.
54. In summary, the concerns raised in the submission are valid and have been appropriately addressed in the LVIA. The assessment concludes that the proposed alteration to the

designation is likely to result in improved landscape character and visual amenity outcomes compared to the permitted baseline scenario.

## Conclusions

55. The effects ratings presented in the LVIA are sound and well-founded. From a landscape and visual effects perspective, the appropriateness of the proposal is strongly reliant on comparison and assessment against the permitted baseline, which provides for a reservoir of similar scale and could result in comparable or potentially greater adverse effects due to proximity to Ruakiwi Road and the heritage structure. When considered in this context, the proposed works can be appropriately managed through designation conditions, including the new or modified conditions recommended below.
56. The design incorporates integrated mitigation measures and demonstrates a thoughtful approach to addressing the surrounding context. However, the sheer scale of the proposal remains challenging to reconcile with the intent of Open Space Zone objectives and policies. While mitigation measures go some way toward reducing adverse effects, they cannot fully offset the permanent loss of open space. Overall, the proposal reflects a clear effort to minimise effects and align with statutory requirements, but the residual impact on open space values remains a key consideration.

## Recommendations

### Designation conditions

57. The conclusions of this memo are supported by the following recommended amendments and/or additions to the Requiring Authority's proposed designation conditions:

#### Ecological, Cultural and Landscape Management Plan

- a. The ECLMP shall include the following plant performance standards:
- i. Establish landscape planting as soon as reasonably practicable following the completion of each stage, or discrete location, of the Construction Works;
  - ii. All native plants supplied to the project shall be certified eco-sourced from the Hamilton Ecological District.

#### Architectural and Landscape Design

- b. The architectural and landscape design features illustrated in the concept design, which are integral to the proposal and described as mitigation, must be carried through the detailed design stages and implemented to a standard that is equal to or better than what is presented in the concept renders<sup>4</sup>.

This includes, but is not limited to, the following key architectural features:

An architectural screening element encasing the reservoir tanks to provide a visually cohesive and contextually sensitive frontage to Ruakiwi Road and the adjoining Domain open space. The screen shall incorporate integrated gates positioned in front of any exposed roller doors, designed in the same profile and materiality for continuity. Material selection

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<sup>4</sup>Ruakiwi Reservoirs, Hamilton Lake Domain, Architectural + Landscape Preliminary Design: Revision D. Edwards White Registered Architects, Adrian Morton Landscape Architects Ltd, BHW Studio (25 July 2025).

must exhibit recessive colour and texture qualities such as weathered Corten steel or natural timber with a matte finish and no reflectivity to maintain visual integration with the surrounding landscape;

And, the following landscape design features:

- i. A network of pedestrian path connections linking Ruakiwi Road to the existing circulation routes, providing access around all sides of the new reservoirs and establishing connections into the Lake Domain pathway network.
  - ii. Gentle undulating slopes of the open space abutting the mass concrete retaining wall, designed to minimise changes to the landform and create the appearance of the reservoirs 'emerging' from the landscape;
  - iii. Strategically located tree species to soften the visual impact of the reservoir structures;
  - iv. Staged removal of trees to coincide with the two construction stages.
- c. The requiring authority must either:
- i. Implement one or more of the following reuse or recycling options for timber from the mature trees to be removed, such as use in architectural elements, public art, street furniture, or other applications within the domain;
- or
- ii. Demonstrate to the satisfaction of the territorial authority why such reuse or recycling is not feasible, including consideration of practical, environmental, or cultural constraints.
- d. Architectural and Landscape design shall be developed in accordance with the Hamilton Kirikiriroa Central City Public Space Design Guidelines (June 2023).
- e. Architectural and Landscape design promotes a sense of personal safety by aligning with best practice guidelines, such as:
- i. Crime Prevention Through Environmental Design (CPTED) principles;
  - ii. Safety in Design (SID) requirements, and
  - iii. Maintenance in Design (MID) requirements and anti-vandalism/anti-graffiti measures.