

**RESOURCE RECOVERY PARK PROPOSAL, 30 BENMORE CRESCENT,
MANOR PARK
ASSESSMENT OF LANDSCAPE EFFECTS**

PEER REVIEW - ADDENDUM

1 September 2025

Isthmus.

Client Name: **Hutt City Council**

Project Name: **Resource Recovery Park, 30 Benmore Crescent, Manor Park**

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1.0 INTRODUCTION

- 1.1 In 2023 Isthmus Group (IGL) provided Hutt City Council (HCC) with a peer review¹ of the Assessment of Landscape and Visual Effects (LVEA) for a proposed Resource Recovery Park at 30 Benmore Crescent, Manor Park, Lower Hutt.
- 1.2 Overall, the peer review found that LVEA methodology was consistent with best practice. While the peer review considered some of the effects to be more adverse than the LVEA (e.g. low moderate rather than low), the differences related to short-term effects or were, in our opinion, able to be addressed with the inclusion of sufficient internal planting to the site.
- 1.3 The peer review recommended that HCC seek further information from the applicant relating to the proposed mitigation measures; and to confirm that the proposal (an industrial-type use) will be consistent with the broad-scale landscape strategy for Te Awa Kairangi Hutt River.
- 1.4 The applicant has now provided the additional information to HCC, as required to resume processing the application. This has included the LVEA author response to confirmed overlays (Secondary River Corridor) and permitted building footprint of 20m² for the site.
- 1.5 IGL has been engaged by HCC to provide an addendum update to the 2023 peer review, to consider the new information provided.
- 1.6 This addendum report does not substantively repeat information and should be read alongside the 2023 peer review.
- 1.7 The methodology for this addendum update has included a site visit to view the changes which have occurred at the site since 2023 (vegetation removal and separately consented earthworks).

Documents

- 1.8 The following documents have been reviewed for this report (as provided by the applicant in response to the 2023 requests and relating to additional design updates since 2023):
 - Resource Recovery Park LVEA – Peer Review Response; Emma McRae, Landscape Architect, Boffa Miskell, 29 July 2025;
 - Resource Park Recovery Park Development Visual Illustrations, Boffa Miskell July 2025;

¹ Attached to the back of this report.

- Boffa Miskell drawings BM210903-600 Rev C; BM210903_601 Rev D (showing the proposed Manor Park view mitigation);
- WMNZ Proposed Plan, August 2025; Te Karearea Limited, Te Rūnanga o Toa Rangatira, Harris Architects;
- Email dated 20 August 2025 from Emma McRae, Landscape Architect, Boffa Miskell relating to changes to buildings at Waste Management site;
- Boffa Miskell drawing BM210903_1200 Rev B (showing the proposed river trail alignment and proposed planting cross-sections);
- WM Truck workshop drawing set, Harris Architects Ltd; August 2025;
- Email dated 27 August 2025 from Emma McRae, Landscape Architect Boffa Miskell, relating to permitted building footprint at the site (in the Secondary River Corridor).

2.0 RESPONSE TO THE (2023) IGL PEER REVIEW

2.1 The following table sets out the information requested in the 2023 peer review; the applicant's response; and IGL's comments on the further information provided.

Peer Review (2023)	Applicant response (2025) and IGL comment (2025)
Assessment of the proposed industrial landuse inside the river corridor against landscape outcomes anticipated by the Hutt River Environmental Strategy	Applicant Ms McRae of Boffa Miskell has advised that the Strategy seeks to protect and strengthen the river values through careful management, environmental improvements and recreational development alongside the flood protection measures; and that the proposed development will not compromise the ability to manage the balance between ecological enhancement, recreation use, and flood management associated with the river corridor that is managed by GWRC and Hutt City Council. Isthmus comment Accepted.
Details on proposed fencing included in the	Applicant

proposal, and analysis of the related effects.	Ms McRae advises that fencing will comprise a 1.8m security fence, with black or green shelter cloth attached. It notes that “until planting is established at (5 years), the upper portion of the fencing will be visible intermittently from the river corridor trail. Fencing will sit comfortably in the river corridor environment where there is a mix of fencing treatment along private property boundaries this will not be unexpected in the context as there are already timber paling fences adjacent to the River Trail along Mary Huse Drive. “ IGL comment I accept that there is existing fencing nearby at the edge of the river trail at residential lots at Manor Park, and fencing is not an unexpected part of the context. New cross-sections show that the proposed fencing to the edge of the site will be behind planting in views from the river corridor areas. This will assist to integrate fencing in the short term (reduce adverse effects), and screening will increase over time with plant growth. The LVEA recommends that shelter cloth attached to fencing should be green or black to blend with vegetation. A consent condition is recommended to ensure this (if one has not already been included), including that the shelter cloth be maintained/repared until such time as the planting is established and screens the fence (5 years). The dark colour will help to reduce the prominence of the fencing. Accepted, with the consent condition as above.
Advice on how proposed mitigation planting on GWRC land (outside the site’s boundaries) will be assured in the long-term, to safeguard the assessed effects.	Applicant A formal approval from Greater Wellington Regional Council (GWRC) will be needed to provide for the proposed mitigation planting to be maintained by the applicant through to establishment and retained in place as proposed over the long term. Ms McRae has advised that a condition of consent is proposed to ensure this approval is in place prior to commencement of any site development; and that it is anticipated that this will be supported by the Council, and that the new planting is unlikely to be removed in the long-term, given its higher value than that existing at the edge of the site. IGL comment Accepted, with the proposed condition.

Assurance that mitigation planting intended to conceal the proposal from Mary Huse Grove will be closely spaced, to achieve optimum screening of the new buildings.	Applicant A consent condition is proposed to require a detailed planting plan for areas facing Mary Huse Grove, with condition wording to require the planting plan to optimize screening from the properties at Mary Huse Grove and speed of planting establishment to reach 8m screening height after 5 years. IGL comment Accepted with the proposed condition.
Assurance that substantial planting will be included across the site internally (along Dry Creek and around the new buildings), to integrate the new buildings into the river corridor in elevated views from the surrounding context.	Applicant Ms McRae's response advises that "opportunities for further planting within the site have been explored, however the operational requirements of traffic movement in and out of the buildings and around the site mean practical locations for large trees to establish are challenging to find. Despite the operational challenges, new planting sites totalling 1290m² in area within the site have been identified." IGL comment Additional planting to internal parts of the site is proposed in two main (larger) beds - adjacent to the RTS Operations Warehouse at the east end of the site, and between the office building and workshops. These beds will help to integrate the development into the surrounding natural context, where visible. (In the visual illustration provided (VS8) the bed between the office building and workshops does not appear to be shown/may not be visible, and the bed adjacent to the RTS building is obscured in the viewpoint but may be visible from the front parts of dwellings). Other new internal planting proposed in response to the IGL peer review is very limited and seems unlikely to be visible in elevated views from Stokes Valley, where it is located closely behind (to the north of) proposed buildings, in these views. The vegetation is not visible in the updated illustration (VS8). My opinion remains, (as set out in the peer review), that without further internal planting to the site the long-term visual amenity effect in elevated views from near-by parts of Stokes Valley, and the natural character effect for these areas (the effect on the ability to appreciate the site's

	contribution to the natural character of the river corridor²) will be at least³ Low-Moderate adverse, which is greater than assessed in the LVEA. Ms McRae has assessed a Low adverse experiential effect on natural character from the wider context (out to 500m), and a Neutral effect overall. In my opinion, while natural character includes natural science as well as perceptual matters, the perceptual effect from the proposal in the elevated view from Stokes Valley will not be cancelled out (or adequately addressed) by increased natural science values brought about by the proposed new indigenous plantings to the edge of the site. Key points are as follows: • Currently the site can be appreciated in the elevated views from Stokes Valley as a contiguous part of the undeveloped river corridor. While the site can be developed to include built form and activities under the District Plan,⁴ the proposed development exceeds that anticipated (it is non-complying). The visual illustration provided (VS8) shows that internal parts of the site will be visible beyond the proposed edge plantings, in elevated views from Stokes Valley. Further, in my opinion there will be additional adverse effects to those shown in VS8, from parked and moving vehicles across the site (not shown in VS8). • It would generally be expected to see a greater amount of vegetation, in naturalised groupings within the site as part of the rural zone, to retain amenity values (as required by the zone's provisions). While the site is not typically "rural",⁵ its undeveloped character contributes amenity in views from surrounding areas,⁶ and as the application is not for a plan change the zone's provisions will apply. Additionally, at this site natural character matters apply and it is currently undeveloped (other than recent earthworks).
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² Noting that natural character contributes to visual amenity.

³ Noting that individual residents will have their own opinions and may rate effects more adversely. Te Tangi a te Manu advises to take a cautious approach in assessing "adverse effects on a person" due to matters of natural justice and potential implications as to whether an affected person is given the opportunity to be heard (through public or limited notification).

⁴ Refer to the heading "Permitted baseline" at the end of this memo.

⁵ For example, it does not include large open areas of pasture and/or agricultural/horticultural uses.

⁶ As noted in the 2022 Boffa Miskell LVEA, (refer to paragraph 3.5.2) the Hutt City District Plan describes the rural area as different from urban and rural residential areas, including due to the low intensity of both activities and buildings.

	While I accept that the elevated view from Stokes Valley takes in a range of components, (including Pomare Rail Bridge, roads and houses and other buildings, and Horokiwi Quarry and Haywards Hill substation – both more distantly seen), the site is centrally located in the view for a number of dwellings and is located at close enough proximity (around 500-600m)⁷ to be a prominent component in the elevated view. The site’s relatively undeveloped character (protected by the rural zoning, and with natural character provisions also applying) has heightened value in the view for the visual break it provides from urban development on the valley floor. As set out in the peer review, in my opinion the adverse effects could be mitigated with more planting across internal parts of the site. While the geotechnical constraints and operational needs of the activity are recognised, in looking at the proposed site plan there appears to be large open areas and it has not been made clear why additional planting beds cannot be included – for example, inside the B-Train turning circles marked on the plan. Bed shapes which relate to the rural/natural context (for example, provide for groups of trees) are recommended over narrow straight beds alongside buildings and parking areas. Straight lines of planting to the edge of the structures will reinforce the shape of the buildings rather than integrate buildings into the natural context. Additionally, narrow bed depths may make it difficult to plant larger mature height trees that are similar, or, in preference, greater than the building heights.
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3.0 DESIGN UPDATES (NOT RELATED TO THE 2023 IGL PEER REVIEW)

3.1 Additional design changes (not made in response to the peer review) are understood from LVEA memo (29 July 2025) and Boffa Miskell email (20 August 2025) to be:

- Inclusion of a water tank for firefighting supplies (proposed to be located at the east side of the site, facing Mary Huse Grove). The tank is proposed as partially buried, with adjacent bunding with planting, and with the tank to be painted a recessive colour. Planting to the

⁷ Measured roughly off google-maps. (The visual illustrations in the LVEA do not include distances of viewpoints from the site).

bund will be with larger grade trees (3-4m at the time of planting), to provide screening in views from the street on Mary Huse Grove.

- Further vegetation removal at the site (removal of a large macrocarpa tree) in the vicinity of Mary Huse Drive;
- Addition of a roof cover to the truck wash area and reconfiguration of the truck workshops to include space for a pump room and battery storage for the solar and EV charge systems, and with the roof redesigned to simplify the shape and form.

- 3.2 The LVEA memo (29 July 2025) updates the assessment of effects in response to the addition of the water tank and removal of the macrocarpa. It finds there will be no change to the ratings provided for visual amenity effects in views from Mary Huse Drive from these changes. This is supported by the updated visual simulation provided for VPs 4 and 5 (which shows views of the water tank will be screened by the proposed planting).
- 3.3 I agree with the LVEA's findings on effects from these recent changes. The tank will be well integrated into planting and, if partially visible in any views, the visual amenity effect will be further mitigated by the recessive colour. New planting will sufficiently replace the removed macrocarpa over time, with growth.
- 3.4 Assessment of effects from the design changes to the truck workshops and wash area has been provided in an email (dated 20 August 2025). This finds that there will be very limited visual change as the bulk and location of both buildings is the same, and there will be no material change to the findings of the memo 29th July 2025.
- 3.5 The 2022 LVEA describes the truck wash area as including a "canopy," which is understood as a roofed-type cover to the area. The change to inclusion of a "roof" is assumed to provide a similar, covered appearance in elevated, distant views. In this case, (and given Ms McRae's advice that the bulk and location of the buildings is unchanged), I agree with Ms McRae's findings on effects from this design change.

4.0 PERMITTED BASELINE

- 4.1 During this review update HCC advised that the "permitted baseline" for the proposal has been incorrectly set out in the AEE (and this has similarly been set out in the 2022 LVEA). The AEE and LVEA⁸ note that as part of the rural zone the site has a "permitted building height of 8 metres

⁸ Refer to paragraph 3.5.7 of the 2022 LVEA.

(from pre-bulk earthworks ground level) with permitted site coverage of 1000m² and two dwellings permitted per site. Minimum permitted site area is 15ha.”

- 4.2 HCC has advised that 1,000m² of building cannot be undertaken within the site “due to the entire area being within the “Secondary River Corridor”. This results in only 20m² of building being able to be constructed as a permitted activity. Any building over 20m² would require resource consent as a Restricted Discretionary Activity under Rule 8B 2.2(i), with matters of discretion being proximity of buildings and structures to flood protection structures; and adverse effects of the flood hazard on buildings and structures and on flood protection structures.”
- 4.3 Boffa Miskell has advised⁹ that no weight was put on the incorrectly noted permitted baseline, in the ratings of effects provided in 2022 or in subsequent LVEA updates. The LVEA (2022) sets out that the evaluation of the existing environment provides the basis for its assessment of effects.¹⁰
- 4.4 In any case, I note that the existing environment at the site, (with no buildings present), is a very close representation of the 20m² permitted baseline for buildings at the site.
- 4.5 Regardless of whether the permitted baseline is used to assess effects, Te Tangi a te Manu sets out¹¹ that an assessment of effects should be carried out with District Plan provisions in mind, as these define what is generally anticipated at a site in terms of development. At this site the level of built form anticipated is limited (compared to site with urban zoning), and adverse effects from development must be mitigated to retain amenity and natural character values.
- 4.6 The LVEA notes that the permitted standard for vegetation removal at the site (which permits all vegetation to be removed) “forms an important part of the context for assessment of effects”.¹² In my opinion, standards which anticipate significantly less built form at the site than is being proposed are similarly relevant, along with provisions relating to retention of amenity and natural character.

5.0 CONCLUSIONS

- 5.1 Ms McRae and I agree that long-term natural character, landscape and visual amenity effects for areas directly adjacent to the proposal (along the Hutt River Trail and at Manor Park) will be sufficiently mitigated by proposed edge plantings.

⁹ In an email from Ms McRae dated 27 August 2025.

¹⁰ Refer to Section 4 Existing Environment, paragraph 4.1.1, in the 2022 LVEA.

¹¹ Refer to paragraphs 6.31-6.32 in Te Tangi a te Manu for information relating to the permitted baseline and consideration of District Plan provisions in assessment of effects.

¹² Refer to paragraph 35.9 of the 2022 LVEA.

- 5.2 Matters relating to effects on which additional information was sought in the 2023 peer review have, for the most part, been addressed in the proposal through the design updates.
- 5.3 I agree with Ms McRae that design updates since the 2023 peer review (additional to those made in response to the peer review) will not result in a greater level of adverse natural character, landscape or visual amenity effects than assessed in the (2022) LVEA.
- 5.4 One area of disagreement remains between the LVEA and the peer review. This relates to the long-term effect in views from near-by elevated parts of Stokes Valley. While some additional planting to internal parts of the site has been included in the revised site plan in response to the 2023 IGL peer review, in my opinion this will not be sufficient to mitigate adverse effects on visual amenity and natural character, for nearby elevated parts of Stokes Valley. I rate the effects more adversely than the LVEA, at Low-Moderate.
- 5.5 The peer review recommendation remains to investigate further opportunities to include more planting to internal parts of the site. This planting should avoid narrow 'edge' beds that emphasise the buildings form, and do not provide for trees of the same or greater height than the structures.

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