

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

PEER REVIEW

14 September 2023

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 Isthmus Group (IGL) has been engaged by Hutt City Council (HCC) to undertake a peer review of the Assessment of Landscape Effects (LVEA) for a proposed Resource Recovery Park at 30 Benmore Crescent, Manor Park, Lower Hutt.
- 1.2 The proposal site is located just south-west of residential areas at Manor Park, inside the river corridor of Te Awa Kairangi/Hutt River (along the Hutt River Trail) and is adjacent to the railway line in this area.
- 1.3 The site is part of ancestral lands and forms part of the Ngāti Toa Rangatira Claims Settlements Act 2014.¹ It is currently undeveloped and has a mixed cover of gravel clearings and vegetation, including along the boundary with Te Awa Kairangi.
- 1.4 The proposal includes buildings which exceed the maximum height standard and maximum site coverage standard and has an overall activity status of non-complying.
- 1.5 This peer review has been carried out in line with Te Tangi a te Manu (TTatM), the landscape assessment guidelines provided by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (TPO NZILA). It provides an appraisal of the proposal LVEA rather than a full parallel assessment. Any additional assessment of effects provided relates to matters on which IGL has formed a differing opinion to the proposal LVEA.
- 1.6 Key documents considered for this review have been:
 - Resource Recovery Park Proposal, Assessment of Landscape Effects, Boffa Miskell Ltd; 19 December 2022, with graphic attachments including proposed landscape plan, cross-sections and Visual Illustrations;²
 - LVEA Addendum, Boffa Miskell, 31 March 2023; including additional drawing set BM2 10903 600-603 Rev B.
- 1.7 Additionally, the peer review has included targeted review of the AEE³ for the proposal where this has been needed to understand the proposal, the scope of the LVEA, and the findings of other specialists as these contribute to landscape effects.

¹ As noted in the proposal AEE.

² As provided inside the document Application for Land Use Consent and Assessment of Environmental Effects, Potentialis Planning, 26 January 2023.

³ Application for Land Use Consent and Assessment of Environmental Effects, Potentialis Planning, 26 January 2023.

2.0 APPROPRIATE METHODOLOGY

- 2.1 The LVEA provides a clear outline of the assessment methodology used. The methodology is in line with best practice as recommended in Te Tangi a Manu (TTatM), the assessment guidelines provided by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (TPO NZILA).

3.0 PROPOSAL OUTLINE

- 3.1 The LVEA provides a high-level outline of the proposal. Further details are included in the AEE for the proposal, and in the assessment of effects section of the LVEA. Overall, the proposal is clear and can be understood from the proposal documents.
- 3.2 The key components of the proposal (relevant to the LVEA) are understood to be:
- Removal of all vegetation from the site;
 - New vegetation planting at the site boundaries, including at the boundary with Te Awa Kairangi and along the north-eastern boundary and rail corridor. The new planting will extend into adjacent GWRC land at the site boundary with the river corridor. A landscape plan is included showing these areas;
 - Inclusion of new buildings (above the height rules for the zone);
 - Re-aligned access to the site which will provide for removal of existing structures over Dry Creek within the proposal site (as part of a separate consent application);
 - Recommended recessive colour for proposed buildings.
- 3.3 It is understood that further work (outlined in the Addendum report) has updated the consent design to include:
- Reduced building height for proposed buildings;
 - Proposed realignment of the Hutt River Trail as it passes the site;
 - Updated design of mitigation planting to improve screening of the proposal from adjacent areas;
 - River maintenance access through the site.

- 3.4 It is assumed that existing vegetation adjacent to the site inside the river corridor (at the boundary with the site) will be retained (as indicated in the Visual Illustrations).
- 3.5 It is noted that earthworks needed for the proposal are excluded from the LVEA scope as these have been consented through an earlier, separate consent application.⁴

4.0 EXISTING ENVIRONMENT

Evaluation of landscape characteristics and values

- 4.1 The LVEA provides a description of the site and context, and includes evaluation of landscape and natural character values within the assessment section.
- 4.2 In general, I am in agreement with the evaluative commentary provided. I would add some additional comments – as outlined below.

Landscape character

- 4.3 I agree that the site does not exhibit any rural character and is not part of a wider area of recognisable rural landscape pattern,⁵ and appears unmanaged. In my opinion the site is best characterised as an undeveloped part of the river corridor of Te Awa Kairangi, contributing to the overall predominantly undeveloped and vegetated river landscape. The river is in close proximity to the southern boundary of the site and Dry Creek is a tributary to the awa.

Natural character

- 4.4 The LVEA notes that GWRC and Hutt City Council have not carried out an assessment of the natural character of the region's lakes and rivers and their margins. The LVEA provides assessment of the existing levels of natural character at the site, and at Te Awa Kairangi in the vicinity of the site. It assesses the site as having a **moderate-low** level of natural character and Te Awa Kairangi as having a **moderate** level of natural character in the vicinity of the site.
- 4.5 From the description, evaluation and site photos provided, I agree with the assessment of natural character within the site as **moderate-low**.
- 4.6 I agree that natural character at Te Awa Kairangi in the vicinity of the site is **moderate**, influenced by the infrastructure components in the context (i.e. Pomare Bridge, which crosses

⁴ An indicated in the AEE.

⁵ This is relevant as the site is zoned rural in the District Plan.

the Trail and is visually prominent from the Trail near the site), residential development in close proximity (at Manor Park), and other modifications for flood protection which have occurred inside the river corridor.

4.7 In my opinion the site contributes to the existing levels of natural character along Te Awa Kairangi in the vicinity of the site. This is due to its undeveloped character (lack of visible structures) and the presence of vegetation at its boundary with the river corridor – which contribute to the broadly undeveloped and vegetated natural character of Te Awa Kairangi river corridor. This relates to the experience from areas close to the site, and as the river corridor is perceived in views from further afield (in distant, elevated views).⁶

4.8 Further, I would add that views of the vegetated Belmont Hills gained from within the river corridor in this area contribute to the natural character (and visual amenity) experience along Te Awa Kairangi. Views of the steep vegetated Belmont hills from within the river corridor contribute a wider natural backdrop. In the vicinity of the site the vegetated slopes of the Belmont Hills at times appear contiguous with the existing vegetation at the site.⁷

5.0 VISUAL CATCHMENT/VIEWING AUDIENCE

5.1 The LVEA has appropriately defined the visual catchment and has included appropriate viewpoints for consideration of effects from the proposal.

6.0 PLANNING FRAMEWORK

6.1 The LVEA notes the activity status of the proposal (non-complying) and sets out the statutory provisions relevant to the assessment of natural character, landscape and visual effects at the site. Planning overlays relevant to landscape matters at the site and within the context are noted and mapped in the graphic appendices.

6.2 I understand from the LVEA that the SALs mapped in the vicinity of the site are identified in a landscape study currently being reviewed by HCC. From my preliminary review of the Hutt City District Plan and proposed Plan Changes I have not been able to locate the SALs shown, as mapped in the proposal documents.

⁶ As illustrated in the photos included in the LVEA.

⁷ As illustrated by the photos attached to the proposal LVEA.

- 6.3 Landscape studies carried out in the area (non-statutory) have been noted as used to understand landscape values at the site and within the context, and key strategic planning documents relating to Te Awa Kairangi are appropriately identified.

7.0 ASSESSMENT OF EFFECTS

Natural character

- 7.1 The LVEA has assessed long-term overall effects on the natural character of Te Awa Kairangi as **Neutral**, with the mitigation proposed. This is described as relating to within approximately 500m as a viewer passes the site.
- 7.2 In my opinion, the adverse effect on the experience/perceptions of the natural character cannot be completely negated by the neutral (as assessed in the LVEA) effects on biophysical values at the site/site edge.⁸ This is due to the way in which the site will be experienced in views, and is perceived as part of the of the river landscape. As such, I disagree with the overall neutral finding.
- 7.3 The photo simulations provided in the LVEA show a clear perceptual impact from the proposed large new buildings, in views from Taita and in elevated views from the context (in which the existing site can be appreciated as a contiguous part of the undeveloped river corridor). I would rate the short-term adverse perceptual effect from these areas as **Low-Moderate**.
- 7.4 From some parts of the Hutt River Trail, close to the site and where new buildings are not screened by existing vegetation, in my opinion there will be a larger short-term impact on the experience/perceptions of natural character of the river corridor, until mitigation planting grows. In my opinion, the effect in these close views will be **Moderate** adverse, in the short-term. The short-term adverse effect would be less from parts of the Trail where the proposal is screened by existing vegetation.
- 7.5 Proposed mitigation planting is located outside the boundary of the site (on GWRC land). It is not clear to me from the LVEA how the planting will be assured, although this information may be in the AEE. In my opinion, if assured (for example through agreements with GWRC), the mitigation planting proposed in the Addendum, together with the proposed re-alignment of the Hutt River Trail as it passes the site, will be effective over time to reduce adverse effects on perceptions of natural character to **Low** at the most, for users of the Hutt River Trail in this area, and to **Low**

⁸ Natural character includes both natural science and perceptual matters, which combine to create “character” – as outlined in Te Tangi a te Manu.

adverse for users of the river corridor on the other side of the river, near Taita. With mitigation planting included inside the site (as I understand is proposed along Dry Creek – although through a separate consent application), the adverse effect in elevated views of the undeveloped river corridor, as experienced by the wider community, would reduce to **Low** adverse.

- 7.6 The LVEA assessment commentary notes that the proposal includes fencing.⁹ (The above ratings, I have provided, do not take account of fencing). I have not been able to find details of the proposed fencing on the plans and fencing is not visible in the graphics provided.¹⁰ It is recommended that further information is sought on the proposed fencing type and location, along with analysis of the effects of this.

Landscape

- 7.7 The LVEA has found that the proposed development will result in **Low** adverse effects at a *wider landscape scale*, with **Low-Moderate** adverse effects on the *local landscape character* due to mature vegetation removal and the introduction of large-scale building development and new activities at the site (noted as likely audible by the LVEA).
- 7.8 I note that the rating has not been updated in the LVEA Addendum report, so it is not clear whether the design changes made are assessed to provide additional mitigation (and therefore reduced adverse effects), in terms of landscape.
- 7.9 In this context natural/naturalised features at the site (such as vegetation) contribute to both natural character and landscape values.¹¹ For that reason, in my opinion effects on landscape values and overall landscape character will be closely linked to effects on natural character. (Refer to the comments provided on natural character effects, above).¹² With the design updates included in the LVEA Addendum, and inclusion of mitigation planting internally across the site, I would rate the long-term adverse landscape effect overall as **Low**.
- 7.10 The body of the LVEA has not specified whether the findings of other specialists (where these contribute to landscape values) have been considered in the effects ratings.¹³ However, in

⁹ Refer to LVEA paragraph 5.2.15. Lighting is also mentioned and has not been assessed in the LVEA, but is assessed separately within the wider AEE.

¹⁰ Noting that this may be because it is screened by retained vegetation.

¹¹ Including shared and recognised values (such as enjoyment of the open river landscape for recreational uses. As set out in Te Tangi a te Manu, natural character is a “type” of character.

¹² That is - in this context, in my opinion, it would be logical to assume there are adverse effects on natural character if there are adverse effects on natural or naturalised features within the river landscape, which includes the site. This is reflected in my rating for natural character effects – refer to the Natural Character heading.

¹³ As is best practice, as recommended in Te Tangi a te Manu.

considering the findings of other specialists, from review of the AEE, the ratings provided in the LVEA for landscape, are considered to be reflective of/consistent with those findings.¹⁴

Assessment against the planning framework – landscape matters

- 7.11 The LVEA has considered effects in terms of the rural character, which is appropriate given the zoning.
- 7.12 The LVEA has included consideration of consistency of the proposed planting with the Hutt River Environmental Strategy. It has not included comment on the consistency of the new industrial use inside the river corridor with the landscape-related outcomes sought in this strategic document - although this may be provided in the wider AEE. (This is noting that landscape values, as defined by the policies of the GWRC Regional Policy Statement (RPS) also relate to urban patterns- landuse.

Visual amenity

- 7.13 The LVEA has considered effects on visual amenity from a range of viewpoints in the more immediate context, as appropriate. Additional mitigation measures are outlined in the Addendum report, with effects assessed as follows:

Te Awa Kairangi/Hutt River
LVEA (Addendum): Hutt River Trail: Visual effects will be Low – Moderate adverse in the <i>closest views</i> from parts of the trail on the northern side of the river and once planting has established will reduce to Low adverse and None where total screening is achieved. LVEA: Opposite side of the river: Low adverse in the long term with mature mitigation planting. IGL comment: I generally agree with the Low rating for long term effects. I note that this will include the loss of some existing views gained from the Hut River Trail of the wider natural backdrop (vegetated Belmont Hills – at times seen contiguously with the undeveloped site) – replaced by close views of trees, and with a higher quality of vegetation at the site edge.

¹⁴ This relates to impacts on cultural landscape values, wider landscape resilience considerations (relating to flooding risk), and noise. Landscape is an integrating concept and includes wide-ranging values, as set out in Te Tangi a te Manu.

The LVEA ratings are supported by the Addendum Drawing 6003 – with the minimal long term visual effect from the Hutt River Trail achieved by the amended building heights, re-location of parts of the Trail alignment, and increased screening planting (as outlined in the Addendum).
Mary Huse Grove - Public views (road corridor)
LVEA (Addendum): Low adverse reduced to Very Low adverse in the long term once planting have established. IGL comment: Generally agreed – with inclusion of denser spacing of taller species in the mitigation planting than shown in the graphics, to reduce adverse effects as much as possible.
Mary Huse Grove- Views from private properties
LVEA assessment (Addendum): <i>No, 32:</i> Low adverse effect reducing to no effect in the long term with mature mitigation planting. <i>Nos. 27, 29 and 31:</i> No visual effect due to there being no view to the site or proposed buildings from the back yards, due to the proximity to and height of the railway embankment (with reference to Addendum Drawing 601). <i>Nos. 34 northwards:</i> Low adverse effect due to backyard and railway embankment vegetation and increasingly oblique views limiting visibility to the development; and adverse effects reducing to none in the long-term with mature mitigation planting. IGL comment: There could be more short-term visibility of the proposal for closest dwellings than shown in the LVEA cross-sections (drawing 601), if the existing large trees at the site (shown as “marked on site” on drawing 601) do not survive having their trunks buried by the proposed earthworks. Without the existing large trees, in views from the closest rear yards of Mary Huse Grove when standing close to dwellings, the proposed buildings will be visible in the short term for dwellings at nos. 29, 31 and 32. (Refer to the Appendix A to this report, which shows potential sightlines (in red) from viewpoints close to these dwellings). The degree to which the change is seen as adverse will depend on the individual viewer. In my opinion, there is potential for a Low adverse short-term effect for these dwellings, rather than the no effect assessed in the LVEA.

Further, in my opinion, the proposed mitigation/screening trees will need to be more closely spaced than shown in the photo simulations to achieve the assessed long-term “no effect”. (Refer to VS4 Figure 11 in the LVEA Appendix).

In considering Addendum Drawing 601, and with dense planting of tall mitigation species, I agree with the assessed long-term effects for the Mary Huse Grove properties. The LVEA ratings assessment are supported by Addendum Drawing 601.

Other private views (dwellings) - Aldersgate Grove, Whitechapel Grove

Representative view of elevated viewpoints from dwellings is provided by VS8.

LVEA:

Low adverse reducing to **Very Low** in the long-term with mitigation planting.

IGL comment:

I would rate the long-term adverse effect higher for this elevated view as shown (VS8), at **Low-Moderate**. While views are distant and expansive and there is other built form in the context, the large, bulky, proposed buildings are a dominant feature in the view and reduce the visual amenity derived from the undeveloped river corridor landscape. The rating would reduce to **Low** over time with the inclusion of substantial (tall) planting across the site, including around the new buildings, to integrate the site and buildings into the natural context. Internal site planting does not appear to be shown in the photo simulation. I understand that new planting at Dry Creek (internal planting at the site) is to be included as part of a separate consent application. It is not clear to me if this is included in the photo-simulation VS8.

8.0 CONCLUSIONS

- 8.1 Overall, the LVEA is consistent with best practice, and includes reasoned assessment and judgements. While I rate some of the effects slightly more adverse than the LVEA, these relate to short-term effects, or are minimal differences of opinion, and can be mitigated with internal planting to the site. The following provides a summary of findings from the peer review.

Natural character

- 8.2 I would rate adverse effects on the experience/perceptions of natural character of Te Awa Kairangi as higher than the LVEA. I consider that the short-term effects would be **Low Moderate** adverse as experienced from wider surrounding areas¹⁵, and **Moderate** from the Hutt River Trail, close to the site. In my opinion the adverse effect would reduce over time to **Low** (at most) for both the close and more distant experience, with growth of the proposed mitigation planting, and with the inclusion of further mitigation planting internally at the site to integrate the site and new buildings into the natural context.
- 8.3 Fencing design and location should be confirmed, as this could impact the short-term impact on the experience of the river corridor and have additional adverse natural character effects.

Landscape

- 8.4 In my opinion landscape effects are closely related to natural character effects in this context – and as such I would rate effects similarly (refer above). My opinion on this differs slightly from the LVEA findings – which rates the landscape character effects as more adverse than the natural character effects.

Visual Amenity

- 8.5 I consider that there could be more short-term visibility of the new buildings from dwellings at Mary Huse Grove than shown in the LVEA cross-sections – in views from back yards when standing close to houses, if existing large trees at the site do not survive proposed earthworks. (Refer to **Appendix A** to this report).
- 8.6 In my opinion there will be a slightly higher adverse effect than assessed in the LVEA on visual amenity in some elevated views from the surrounding context – as derived from the undeveloped character of the river corridor. This could be mitigated with internal planting to the site, to integrate the site and new buildings into the natural context.

¹⁵ From near Taita and in elevated views of the river corridor.

- 8.7 I am in general agreement with the long-term effects as assessed, with the inclusion of close spacings for mitigation planting at the edge of the site and the inclusion of planting across internal parts of the site (as above).

9.0 RECOMMENDATIONS

- 9.1 It is recommended that HCC seeks further information as follows:

- Assessment of the proposed industrial landuse inside the river corridor against landscape outcomes anticipated by the Hutt River Environmental Strategy;
- Details on proposed fencing included in the proposal, and analysis of the related effects;
- 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 (if this is not provided in the AEE);
- 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;
- 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.

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APPENDIX A

IGL Annotations to Boffa Miskell Drawing BM210903-601

