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Ref: 2017_031_ Fulton Hogan – Golders - LVIA Response to Comments Letter_1

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ROYDON QUARRY, LANDSCAPE AND VISUAL IMPACT ASSESSMENT
 S92 REQUEST FOR ADDITIONAL INFORMATION - RESPONSES

Dear Don

The table below outlines our responses to comments raised in the Section 92 request. The responses should be read with the updated Landscape and Visual Impact Assessment, the appended figures and the Landscape Management Plan which has been prepared.

17 LANDSCAPE - INTRODUCTION AND PROPOSAL

COMMENT	RESPONSE
17.1 Ideally the LVA should stand alone in terms of the information it provides on the proposal, sufficient for all of the landscape and visual effects to be considered. By way of example, there is currently no mention in the LVA of revised road layouts and/ or vehicle entry/ egress, which both have the potential to generate adverse effects. The LVA would therefore benefit from more detail of the Proposal including (but not limited to) issues such as operational hours, anticipated vehicle movements, night time lighting (if applicable) and staging and timing of excavation and mitigation works, and an assessment of the actual and potential effects of these parameters on the landscape values of the surrounding area.	To avoid potential inconsistencies between reports, it is also common practice to refer to the Planner's report for further detail. Either approach is acceptable. Additional information has been added to the introduction to the assessment. The LVIA provides an effects assessment of all the likely effects mentioned including the vehicle entries into the site, the preparation of photo illustrations and sketches showing the likely works.
17.2 Staging and timing of the proposed bund and planting regime is also missing from the proposal section and given its importance to the application more detail should be provided. At this stage it appears as if all of the proposed bunding around the site will be implemented in 'one go' and there is no detail on how the construction of bunds are either partly or wholly reliant on quarry excavation, if indeed they are. Should direct reference to the Draft Rehabilitation Management Plan be relied on to provide some of this information, it should be provided very clearly.	All bunding is to be established as part of the initial site establishment works, with construction works occurring during the months of Autumn and Spring until the entire perimeter is complete. It is anticipated the bunds will take a number of months to construct. Planting will follow in the next available planting season. The bunds will be formed using a mix of material excavated from the site as the plant area (initial extraction area) is established in the middle, and if necessary imported material. The bunds will be predominantly compacted fill with a topsoil cover of 300mm as per the Draft Rehabilitation Plan.

<p>METHODOLOGY</p>	
<p>17.3 The relevance of the Table 1: Continuum of Natural Character to the LVA needs to be more explicit. The consideration of natural character has relevance to the coastal environment under the RMA and NZCPS but it is unclear why, in terms of methodology, it is considered relevant in this case. We note that natural character has not been considered under Section 3: Assessment of Effects of the LVA.</p>	<p>Our LVIA methodology is a standard approach and used for all Landscape and Visual Assessments prepared by our office, noting the importance of Natural character under Section 6a. We have not assessed natural character as the site is not in a coastal environment, a wetland, lake or river or their margin.</p>
<p>17.4 With regard to the assessment of effects on Rural Amenity, the LVA needs to ascertain/ confirm if 'visual effects' are the only aspect of amenity (which includes all sensory aspects that contribute to people's appreciation of a landscape) considered to be relevant? If it is not, then the LVA needs to consider aspects of the proposal that might affect people's broader appreciation for the local landscape – in both positive and negative ways.</p>	<p>Additional information has been added in response to this comment under Policy B3.4.3.</p> <p>In terms of Amenity Values, focusing on aesthetic coherence, the receiving environment has a medium sensitivity to change. As described under Landscape Character, the area is characterised by a low density-built form, large pasture fields and transport infrastructure. Types of views are mixed with open expansive views available to the Alps but equally common are views contained by well-established, often dense shelter belts (refer to photos in the Appended figures). Housing in the area is generally surrounded by well-established vegetation, assumed grown to provide shelter from winds, create a sense of enclosure and provide shade, with the closest suburban residential development being Templeton, approximately 700m, from the site boundary to the east. It is the straight roads, rectangle shaped fields and linear shelter belts which provide the aesthetic coherence to the area, allowing an eclectic group of landuses to be located close to one another without greatly affecting the area's aesthetic coherence or people's amenity.</p> <p>While traffic is not a landscape issue, the movement of cars and the scale of existing road infrastructure in the immediate area is, having a significant effect on aesthetic coherence and rural amenity values. Road markings, increased lane width, hard road shoulders, signage and lighting all contribute to reduce the 'ruralness' of an area and a direct effect on people's appreciation of pleasantness. Traffic movements on Jones Road and SH1 have increased significantly over the last few years, with Jones Road no longer a quiet rural road, due to the residential, industrial and commercial growth of Rolleston, i-Zone and the inland Port. Given existing numbers and the potential growth in traffic movements in the immediate area, the additional vehicle movements generated by the quarry are unlikely to have a marked effect on people's amenity of the area. An existing dwelling towards the centre of the site will be removed, but given its large setback from the road the dwelling's effect on creating a sense of community was minimal. With the development of the bunds and associated landscape plantings there will be a change in the openness of the rural landscape but not one which is considered either negative or positive in terms of amenity – the area will still be largely free of built structures.</p>

	Light pollution is an area which could potentially affect local residents' amenity of the area, but as mentioned earlier, the receiving environment is going through a significant amount of change with the development of the second stage of the Southern Motorway which will be lit to NZTA requirements. Lighting from the quarry will comply with the requirements of the District Plan.
17.5 In terms of Section 2.5: Effects Methodology states that "The proposal is assessed in its 'unmitigated form' and then in its mitigated form to determine the residual effects", yet the process set out in Section 2.4: Visual Assessment Methodology implies the consideration of post mitigation effects only (being that assessing the degree of sensitivity of receptors to change is not the same as assessing the effects of the Proposal on those receptors) and the assessment provided in Table 2 also implies a post-mitigation approach. The LVA needs to clearly identify which approach it is taking.	The assessment identifies effects of an unmitigated proposal, with mitigated measures developed to determine the residual effects. A column with the Unmitigated effects assessment was included in previous versions of Table 2, but with the adoption of all mitigation measures by Fulton Hogan it was removed. This column has been re-inserted.
17.6 There needs to be more explanation of how the two 'scales' of assessment relate to one another. By way of example how does the NZILA 7-point scale 'mesh' with the QP 6-point scale? Also, has the 7-point scale only been used for the assessment of effects or has it also been applied to the assessment of landscape/ receptor sensitivity?	The systems are used to create an objective approach to qualifying the potential effects of a proposal. The NZILA rankings have been used for determining the Magnitude of Change. In my opinion, I consider the QP system allows a greater degree of objectivity when assessing and comparing effects, being used to assess the level of effects which can therefore be used compared/balanced with other disciplines. The seven-point NZILA scale has been used to describe the Magnitude of Change as sensitivity is measured as either low, medium or high.
ASSESSMENT OF EFFECTS	
17.7 The effects on landscape character are largely limited to changes in topography, however in the final sentence of Section 3.2 reference is made to "All other effects on landscape character...". In doing so the LVA implies that there are other effects that may have not been considered due to their effects being less than minor. Clarification is needed on whether there are other aspects of the Proposal that may generate adverse effects regardless of whether these effects are less than minor or not.	Additional information has been added to the assessment. The assessment covered all aspects of Landscape Character, identifying potential losses of existing vegetation, removal of farm buildings and the installation of plant equipment during the operational phase of the quarry. In terms of vegetation loss, the assessment found that the loss of vegetation was a negligible effect with no specimens of note on the site. The establishment of shelter belts, including native species, will result in a positive net benefit of plants, and while they will change the character of the landscape it is a permitted activity only subject to controls over shading adjacent properties or roads. It was considered that the only residual effect on Landscape Character, post rehabilitation of the site would be the effects on topography. When the quarry is rehabilitated, as per the Rehabilitation Plan, the residual effects on Landscape Character will be Less than Minor.
17.8 In Section 3.4: Effects on Visual Amenity the report introduces the concept of "...availability of alternative views" as a matter for consideration. Firstly, the report needs to clarify why this is a relevant consideration with regard to determining visual effects and secondly, the assessment in Table 2 should (if it is a relevant consideration) make	The availability of alternative views has an impact on the sensitivity of a visual receptor, not on the resultant magnitude of change. The line in Section 3.4 mentioning alternative views will be deleted.

<p>mention of these alternative views in determining the overall degree of visual effect.</p>	
<p>17.9 In Section 3.5: Summary of Effects on Visual Amenity the report makes reference to the "...new shared path between Curragh's Road and Dawson's Road being constructed as part of CSM2". The figures/ appendices attached to the LVA illustrate a shared foot path along all of the site boundaries and in the absence of sufficient detail in the proposal section of the LVA confirmation of the location of this pathway is needed as it is relevant in the consideration of potential positive effects of the Proposal.</p>	<p>There is a shared path being developed as part of the CSM2 works and is separate from this project. This project proposes a circuit of paths around the site and linking through to Templeton to provide a safe walking/running route for local residents.</p> <p>The path network is not proposed to address visual amenity issues but has the ability to provide improved connectivity and accessibility through the area for the community. It would be a 'nice to have' but is not considered a necessary mitigation measure to address landscape or visual issues. A possible path route is shown in the appended figures.</p>
<p>Mitigation Measures</p>	
<p>17.10 The mitigation measures identified in Section 4 of the LVA are central to the assessment of landscape and visual effects. We note that section 3.8 of the Draft Rehabilitation Management Plan (Draft RMP) reaffirms these mitigation measures. In the absence of proposed conditions for consent it is difficult to determine the level of certainty and/ or likelihood for success of the proposed measures effectively mitigating landscape and visual effects. The Draft RMP references previous works undertaken by the applicant on other sites (e.g. Miner's Road), however in the absence of detail it is impossible to understand how those previous works are relevant to the Roydon Quarry site. Ideally, the application should include a draft Landscape Management Plan, that includes all aspects of landscape design/ mitigation being proposed and how it will be implemented and managed using a 'whole of life' approach.</p>	<p>A draft Landscape Management Plan is attached, designed to ensure the growth and health of proposed plantings to achieve the desired screening requirements. We are happy to discuss the specifics of this further with you as required.</p>

Please do not hesitate to contact me if you require any clarification.

Yours sincerely



David Compton-Moen

Urban Designer / Landscape Architect

