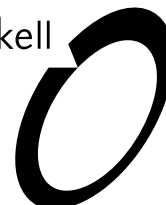


21 June 2021

Liz White  
Principal Planner  
Liz White Planning  
Christchurch  
[liz@lwp.co.nz](mailto:liz@lwp.co.nz)

Boffa Miskell



Dear Liz,

**Plan Change 66: Area Plan Change - Business 2A Zone – Landscape and Visual Effects  
Peer Review**

I provided a Peer Review (outlined in my letter dated 30 October 2020) of the '*Landscape and Visual Effects Assessment for the proposed Business 2A Zone Area Plan Change*', (referred to as The Landscape Assessment). The Landscape Assessment accompanied an AEE (by Novo Group and dated October 2020) for a Private Plan Change (Plan Change 66) to change the operative Selwyn District Plan (SDP). The applicant is Rolleston Industrial Developments Ltd.

The proposal is for an extension to the existing Business 2A Zone (B2A Zone) at Maddisons Road, Rolleston adjacent to the IPort. The application is currently zoned Rural Inner Plains in the SDP. The proposal is to rezone an undeveloped paddock (The Site) immediately adjacent to the IPort industrial area in northern Rolleston<sup>1</sup> to Business 2A.

An Outline Development Plan (ODP) has been prepared for the Site. This is consistent with the ODPs of the surrounding Business 2A Zones. The ODP includes provision for landscape treatments required at the rural-urban interface and an indication of where key road connections are to occur. This landscaping is proposed to the north and east boundaries alongside the rural-residential area.

A Site visit to the Site and surrounding context was undertaken by the Peer Reviewer on 24 October 2020.

The purpose of this letter is primarily in response to Selwyn District Council's request<sup>2</sup> for further information relating to landscape and visual matters (following the initial Boffa Miskell Landscape and Visual review dated 30 October 2020) which stated:

*'6. The assessment of development of the site under the proposed Business 2A zoning is based on the using the actual development within the current Business 2A Zone to the west/southwest for comparison purposes. However, it is not clear from the assessment what the proposed scale / bulk / height/ site coverage of potential built form could be under the Business 2A zone (as per chapter C16 B Zone Buildings) or if the assessment was*

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<sup>1</sup> This IPort site is currently zoned Business 2A under the Selwyn District Plan

<sup>2</sup> Letter to Rolleston Industrial Developments, from Selwyn District Council dated 4 November 2020.

*undertaken on the building parameters as outlined in Rule 16.6.2 of Township Volume. A 'worst case scenario' assessment is considered necessary to enable the full effects of the proposed Plan Change to be understood. Please provide an assessment of the full range of effects of built form that would be permitted under the Business 2A zoning (as relevant to landscape and visual effects).'*

This letter also responds to any submission commenting on landscape and visual matters.

The applicant has prepared an updated Landscape and Visual Assessment<sup>3</sup>.

For the purposes of brevity, this letter will not recanvas matters raised in the letter 30 October 2020, rather it will comment on the robustness of the updated Landscape Assessment following initial peer review and any submissions that raise particular landscape or visual concerns with the Plan Change proposal.

#### *Review of the updated Landscape Assessment*

The updated Landscape Assessment appears to have included a greater level of clarity around the type of built forms that could occur on the Site, including:

- Buildings of up to 15 metres in height.
- Structures up to 25 metres in height.
- Buildings setback from road boundaries and rural zoned adjacent land by 10 metres.
- Provision of a landscape buffer.

The Landscape Assessment has amplified the descriptive part of the assessment, commenting on the adjacently zoned B2A land, and the height of built forms that are currently built, specifically in the LPC and IPort areas.

Within the assessment of visual effects, further assessment has been provided around the 'worse case' scenario, where built forms up to 15 meters in height, coupled with structures of up to 25 metres in height, were established using the 10 metre setback rule.

Based on this, I agree with the Landscape Assessment that adverse visual effects from houses accessed off of Maddisons Road are likely to be in the moderate-high category, however, when considered in conjunction with the landscape treatment, it is considered that the visual effects will reduce over time as the planting matures.

The landscape proposed as part of the proposal, as well as with the proposed changes offered by the applicant following receipt of submissions (see below), will be an appropriate 'edge' treatment to the industrial/ rural interface.

As the Landscape Assessment notes, most viewers in the broader landscape will view the Site as part of the wider industrial land use activities (i.e. IPort and LPC) and would be seen at distances of greater than 1km.

#### *Submissions received*

In total, 10 submissions were received. Of those 10, two<sup>4</sup> cite adverse effects concerning landscape and visual matters. Particular concerns relate to:

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<sup>3</sup> Confusingly, the updated Novo Group Landscape and Visual Effects Assessments is dated September 2020 (i.e. before the date of the SDC letter to Rolleston Industrial Developments Ltd dated 4 November 2020), although a 'Document Date' on the inside page following the frontispiece is dated 9 November 2020.

<sup>4</sup> Submitter 02 Simon Fraser Thomas and Submitter 04 LJ & CM Manion.

- Height of bund (to at least 2.5m in height for Submitter 02; and 3m in height for Submitter 04)
- Retention of the existing shelter belt along the eastern boundary of the Site, together with Landscape Treatment 4 – Submitter 02.
- Certainty around the likely effects in the absence of detailed development proposal – Submitter 02.
- Length of time the planting is likely to take to effectively mitigate the proposal – Submitter 04.
- Visibility of the stacked containers. To reduce them to 3 in height, rather than 6 in height.

In a letter received by SDC from Novo Group, dated 26 May 2021, the applicant proposes several changes to the proposal in response to submissions, notably those landscape and visual related submissions concerning the height of the bund.

The response states:

***'L & C Manion (PC66-0004), Simon Thomas (PC66-0002)***

***Submission points seeking establishment of a bund***

*4. Both submitters have requested that a 2.5m to 3m high bund be established on the northern and eastern boundaries of the site. The ODP is amended to require a 2.5m bund be established on those boundaries, including on the southern rural boundary interface. See Appendix A to this letter.*

*5. A consequent change is required to Rule 17.6.2 as follows (new additions are double underlined): 17.6.2 The establishment of a road or rail crossing requiring a break in the existing primary shelter belt or future secondary planting strip required by Landscape Treatment 3 in Rule 24.1.3.14 along the Railway Road frontage of the Business 2A Zone, or the establishment of a road crossing requiring a break in the future planting strip required by Landscape Treatment 2; or the establishment of a road crossing requiring a break in the bund and future planting strip required by Landscape Treatment 1 as depicted on the Outline Development Plan in Appendix 43A, shall be a restricted discretionary activity'.*

## **Consideration**

I consider that the inclusion of a bund measuring 2.5m to 3m in height along the northern and eastern boundaries of the Site will positively assist in providing an increased level of visual mitigation to the proposed Plan Change. These bunds would be planted in accordance with Appendix A of the Novo Group letter dated 26 May 2021.

The design of the bund will need to be carefully considered to avoid an overly 'engineered' design. Whilst the bund will initially present a different landscape characteristic to the area<sup>5</sup>, the sooner the bunding is planted, the better.

I agree with the Landscape Assessment<sup>6</sup>, in that the landscape areas are implemented as early as possible. Advanced planting of these landscape areas will only assist to ensure that

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<sup>5</sup> In the sense that there are not too many earth bunds in the immediate area, however they are present in the wider context, such along SH1 close to the Rolleston turn-off (Rolleston Drive)

<sup>6</sup> Paragraph 89 of the Novo Group Landscape and Visual Effects Assessment.

visual effects will effectively be contained as much as possible when the development of the Site commences.

It would be helpful for the applicant to provide details of the type of planting proposed and the anticipated growth rates, so that future visual effects could be more accurately gauged. I do, however, consider that native planting, as seen along SH1 close to the Rolleston township would be appropriate. It is also recommended that some form of management be considered for this planting in the early years, as typically planting on an artificial structure has the higher likelihood of 'drying' out quicker in hotter weather, as the roots of the plants are not in the true ground and therefore closer to the water table.

I consider that the retention of the shelterbelt along the eastern boundary of the Site should be retained as long as practicable, while new landscaping along the northern and eastern boundaries matures.

I consider that certainty has been achieved in the assessment of landscape and visual effects as much as practicably possible (especially concerning a private Plan Change request). The Landscape Assessment has considered the 'worst case' scenario<sup>7</sup> and with the implementation of the bunding (and potential advanced construction of the bund and associated planting ahead of future building on the Site) would assist to ameliorate visual effects.

In terms of the height of the stacked containers<sup>8</sup>, I note that there is no specific height limit mentioned the Business 2A Zone. For the purposes of the assessment, I have defined shipping containers as 'buildings' under the Business 2A Zone<sup>9</sup>. Under the Business 2A Zone, a building can be up to 15 metres in height and structures up to 25 metres in height.

I have calculated that the maximum height of six, stacked shipping containers (based on a container measuring 2.9 metres in height, the tallest of all shipping containers) would extend to a height of 17.4 metres, some 2.4 metres greater than the maximum Building height under the Business 2A Zone.

Based on this, and due to the context of the Site with the adjacent IPort and LPC, any stacked containers should not exceed the 15-metre height limit, as a permitted activity (which would mean five stacked containers at the 2.9m height). If the height exceeds 15 metres (for example using six stacked, 2.9-metre-high containers), then this would breach the height limit and a separate consent would be required.

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<sup>7</sup> Paragraph 60 of the Novo Group Landscape and Visual Effects Assessment.

<sup>8</sup> Shipping container heights can vary, depending on requirement. Typically, they vary between 2.6m for a 20ft General Purpose container to 2.9m for a 40ft High cube container. Source: [www.seacontainers.co.nz](http://www.seacontainers.co.nz).

<sup>9</sup> **Building:** means any structure or part of any structure whether permanent, moveable or immovable, but does not include any of the following:

- Any scaffolding or falsework erected temporarily for maintenance or construction purposes
- Any fence or wall of up to 2m in height
- Any structure which is less than 10m<sup>2</sup> in area and 2m in height
- Any vehicle, trailer, tent, caravan or boat which is moveable and is not used as a place of storage, permanent accommodation or business (other than the business of hiring the facility for its intended use)
- Any utility structure.

The visibility of stacked shipping containers could be assessed as a 'permanent transitory' activity, in the sense that they won't always be present in the same numbers and their visual presence will change over time.

### **Conclusion**

This letter allied with my letter dated 30 October 2020 considers that the adverse landscape and visual effects have been appropriately assessed and measures to mitigate have been put forwarded and amplified. The applicant has responded to concerns from submitters citing visual concerns and I consider that the response is appropriate.

Yours sincerely

**BOFFA MISKELL LTD**

A handwritten signature in black ink, appearing to read 'JBentley', with a stylized circular flourish at the beginning.

James Bentley

Senior Principal Landscape Architect