

PROPOSED QUARRY EXPANSION

SOUTHERN SCREENWORKS LTD, 50 BEALEY ROAD, AYLESBURY

LANDSCAPE PEER REVIEW

To: Tim Heggarty, Consultant Planner to Selwyn District Council

Copy: Janette Dovey, Team Leader Resource Consents, Selwyn District Council

From: Jeremy Head, Registered NZILA Landscape Architect
Jeremy Head Landscape Architect 2022 Ltd.

Date: 20 January 2025

Peer review scope

On 20 June 2024, I was asked to peer review the Landscape and Visual Assessment of Effects (**LVA**) prepared by Erina Metcalf, Landscape Architect with Glasson Huxtable Landscape Architects Ltd. More recently I have been asked to consider and provide comment and any recommendations relating to the five submissions received on the application December 2024 – January 2025.

I have read Ms Metcalf's LVA, associated graphic attachments and her 23 July 2024 memo responding to a s92 request for further information (**RFI**) from council. I have read the relevant objectives, policies, and rules from the partially operative district plan (**PODP**) and operative district plan (**ODP**) although as I understand it, the PODP has greater weighting to the application. I have also read the parts of the AEE relevant to landscape matters including the Southern Screenworks Ltd Expanded Quarry and Cleanfill Site Management Plan prepared by Southern Screenworks Ltd (updated draft).

I visited the site and contextual area on 5 July 2024, to examine the landscape character and values of the site and its context and confirm the observations and findings in the LVA. The site visit was attended by the Applicant, Applicant's planner and the Selwyn District Council's consultant planner. Of note, I was escorted around the existing quarry to observe current operations which was helpful in terms of better understanding the Proposal which is an extension of similar activity. The existing quarrying operations were well-organised and the working site was tidy and well cared for. This leads me to believe that the proposed extensions would be treated by Screenworks staff in the same manner with a similar visual outcome.

This peer review is an evaluation of the principal assessment and does not attempt to provide a parallel assessment. The purpose of this peer review is to assist the decision maker (and others) by checking the assessment's methodology and findings and fleshing out any gaps if and when required. My peer review is structured to generally step through and comment on the main headings (although not all of them) in the same order as they appear in the LVA for convenience.

Methodological approach

Ms Metcalf refers the reader to her Appendix 1 for her assessment methodology and Appendix 2 for the graphic supplement. The former draws substantially from Te Tangi a te Manu; Aotearoa New Zealand Landscape Assessment Guidelines (**TTatM**) which is relied upon to underpin her assessment process. Following the guidance in TTatM is now considered standard best practice for landscape architects.

Ms Metcalf lists what was included in the desktop study aspect of her assessment which is thorough and states that a site visit was conducted. The methodological approach is thorough, clearly articulated and sound. The site photographs used in Appendix 2 follow best practice in terms of size and focal length.

Existing landscape and potentially affected parties

A description of the existing landscape is broken down into three main headings: 'wider context', 'intermediate context' and the 'project site'. This clearly demonstrates a thorough and organised understanding of the landscape in which the Proposal is located. Of note 'physical', 'perceptual' and 'associative' attributes - the three widely acknowledged topics to cover when assessing landscapes are only included under the section on 'intermediate context'. And similarly, 'landform', 'landcover' and 'land use' are mentioned only under the 'Project site' heading. While on the face of it this seems inconsistent, I find that the structure Ms Metcalf uses is still helpful and provides a relevant level of detail for each topic.

The findings in Section four of the LVA accord with my own observations of the site and its context and my understandings of the wider Canterbury Plains context.

The 'Receiving Environment' is not described or shown mapped. While its inclusion is not compulsory, a mapped 'receiving environment' can be helpful as it graphically sets out the focussed 'area of study' where any effects of a proposed change may be potentially adverse. Later in her LVA, Ms Metcalf describes several different potentially affected parties. Of note, eighteen individual residences located around the project site are specifically 'singled out' which is helpful. Of the eighteen, eight submitted in opposition (via a limited notification process) to the 2011 resource consent¹ (RC 115008) to establish and operate a quarry at the site. Of note the owner/occupants of 153 Bealey Road, 1056 Railway Road and 62 Station Road opposed the 2011 application partly for rural character and amenity effects reasons.

From my own observations during the site visit, I can confirm that Ms Metcalf has correctly identified the potentially affected parties in the area, which she discusses in terms of the Proposal's effects later in her LVA.

Potential issues arising from the Proposal are listed under Section 7 of the LVA. Cumulative effects are addressed later in the LVA at 8.3.

¹ Via a limited notification process to the 2011 resource consent (RC 115008).

Proposal

The specifics of the Proposal are described at a level of detail relevant to landscape effects and avoids doubling up on the more detailed content in the AEE. In the LVA, no mention was made of the removal of existing shelterbelts where the proposed quarry extension will 'push through' into new areas. This will have the effects of potentially opening up views to the existing authorised quarry operations along with the proposed quarry extension in the short term. Nonetheless the removal of existing shelterbelts is addressed later in the LVA in the landscape effects section and is explained in more detail in the memo responding to the RFI.

Statutory

Statutory matters relevant to landscape are addressed in section 6 of the LVA, under three topics: the Resource Management Act; Canterbury Regional Policy Statement; and Partially Operative Selwyn District Plan – Appeals Version which I understand is the appropriate and relevant version to consider. The approach used in the statutory section helpfully meshes with other sections in the LVA by directing the reader to other relevant sections for a more nuanced response. This approach is sound as it appropriately structures the broader landscape assessment within the relevant planning framework which effectively underpins what is expected in terms of landscape change in the GRUZ.

Landscape effects assessment

Ms Metcalf relies on the recommendations in Section 10 'Recommendations' of the LVA. These recommendations are also shown graphically in most instances on her accompanying plans (Appendix 2 sheets 7.0 and 8.0). Of note, sheet 8.0 indicates an area of *'existing hedge to be removed progressively'* and an area of *'existing lucerne trees and bund to be retained'* inside council owned land. The reliance on areas outside the site cannot be relied upon as this is outside the Applicant's control. This needs to be clarified further.

It is noted that the wording 'should' is used in Section 10 in some places which sounds slightly passive. I assume that 'should' actually means 'must' as the landscape effects assessment relies on the mitigation measures being successfully implemented. As such, I recommend that the mitigation measures outlined in the LVA at Section 10 and in the later response to the RFI be adopted as conditions of consent, should consent be granted.

The findings under landform are stated in the LVA as 'Low to moderate' adverse (minor) which Ms Metcalf clarified through a quick phone call on 8 July as meaning **'Low-moderate'** (minor) on the seven point scale. In my opinion a 'Low-moderate' level of adverse effects is a fair and reasonable conclusion for the various reasons listed under 'Landform' as the changes will be permanent albeit rehabilitated to a degree.

Effects of the Proposal on land use and land cover are considered in the LVA to be **'Low'** and **'Very Low'** adverse respectively. 'Low' adverse effects straddle a 'less than minor' and 'minor' level of effects. Again, during the 8 July conversation with Ms Metcalf, this was clarified as being at the 'less than minor' end of 'Low'. In my opinion, the Proposal's effects on land use and land cover - effects which are not confined to the visual realm will be slightly higher at **'Low-moderate'** (minor) for both as quarrying activity will occur for several decades over a substantial area, at times occurring relatively

close to several permanent parties². At any given point in time there will be a marked change to the pasture land cover at a part of the site. Following cessation of quarrying and site rehabilitation, the effects on land use and land cover in my opinion will be negligible (neither adverse nor positive, just different reflecting the altered topography of the site).

Cumulative effects are considered in the LVA to be 'negligible' (neither adverse nor positive), given the site's generous separation from similar quarrying activity. Of relevance, cumulative effects can also arise through the extension of earlier consented development, which is the case here. However, given that the scale of proposed quarrying at any one time will not be considerably different to the existing quarry size, it is of my opinion that cumulative effects are less relevant than the actual effects of the Proposal.

Visual effects

Visual effects are covered separately, but correctly acknowledged as a 'subset' of, and aid, to inform broader landscape effects. The viewing audience is divided up between those on SH73 (including from the 'Lions Lookout'), local roads and the Midland Railway Line (all public viewpoints). The private viewing audience is addressed separately by property. The extent of the potential public and private viewing audiences are appropriate in my opinion. What each party currently sees and the effects of the proposed changes are well articulated and accord with my own observations from various viewpoints around the site. The series of site photographs provided (Appendix 2 sheets 5.1 – 6.12) are helpful and support the conclusions made.

A point is made on page 20 of the LVA that the existing quarrying activity will be visible from SH73 in the short term when the existing hedging to the northeast and northwest is removed. However, I understand that the temporary 2-3m high bunding formed before the shelterbelt trees are removed will largely screen SH73 views into this part of the site. This is confirmed by Ms Metcalf in her response to the RFI. Ms Metcalf also mentions in her response to the RFI that she understands the trees have now been planted alongside SH73. During my site visit, I observed that holes had been 'dug ready' at the correct spacings alongside SH73 and the trees were sited in their bags at heights of 750mm – 1.0m as proposed.

Ms Metcalf correctly identifies that view heights will be higher from the train, buses and trucks passing by than the typical 1.2m view height from a car. As such, in the short to medium term the Proposal will be visible over the bund before the shelterbelt trees have matured. Effects are considered in the LVA for these parties to be '**Low**' adverse at the outset, which is a fair and reasonable conclusion given the transient nature of the views. Over time when the proposed hedging had matured, I would anticipate that these 'Low' adverse effects may decrease to nil.

One item of note is the reference on Appendix 2 sheet 7.0 regarding a section of shelterbelt along the western boundary of the site (pink dots). Ms Metcalf refers to this in the graphic key as an "*existing Leyland Cypress hedge to be maintained at a height agreed with neighbours*" - in this case the neighbour at 158 Bealey Road. The LVA relies on this 7-8m high hedge being retained which Ms Metcalf says "*...appears to be within the application site.*" On Ms Metcalf's sheet 7.0 the hedge is shown partly outside the site. In response to the RFI around this uncertainty, the Applicant has provided a

² Occupants of 23, 35, 137, 153 and 158 Bealey Road.

survey plan³. This shows the hedge straddling the Applicant's site and the neighbouring property. The hedge is possibly planted on the boundary which is not unusual. As such either party would have a say regarding any changes. Putting all that to one side, it is of my opinion that if it was *planted* on the neighbours property and potentially removed, there would be little profit in its removal, as it would cease to provide valuable easterly shelter to the occupants. Further, the response to the RFI also states that discussions were held between the Applicant and neighbour at 158 Bealey Road, where an agreement was reached that the hedge would be retained in situ while quarrying was in operation.

I recommend that the key to the pink dots on sheet 7.0 be updated with text that reads something along the lines of: *"Proposed section of Leyland Cypress hedge to be retained and maintained at a height agreed with neighbours."* Conditions should be added requiring its replacement with an equivalent tree species in the event the hedge becomes diseased, damaged or dies.

I have been asked to specifically consider the properties where the owner/occupants opposed the 2011 Screenworks' application to build and operate a quarry at the site⁴. While eight submissions in opposition were received, five did not include reference to landscape-related matters. The three properties where the owners/occupiers conveyed landscape concerns included:

- 153 Bealey Road
- 1056 Railway Road
- 62 Station Road.

I will also further consider the landscape-related effects on the property at 23 Bealey Road⁵.

153 Bealey Road Ms Metcalf describes this property (from the road) on page 23 of her LVA which accords with my own observations during the site visit. This 0.56 ha property has an approximately 70 m long road frontage, largely planted in dense vegetation. The 2011 submission was brief and with regards to landscape – related issues appeared to be concerned with their proximity to the quarry activity. This is not solely about visual effects. Ms Metcalf finds that the effects of the Proposal will be '**Low**' adverse (less than minor to minor). The 'low' finding ignores the existing vegetation at 153 Bealey Road combined with brief views into the site being available in the short term from the driveway and road approaches. When quarrying activity (Stage 4) is opposite this property, the hedge will be established to such an extent that it will form a visual screen from the road (and property). The hedging specified in the application has, according to Southern Woods tree nursery in Rolleston - a 'very rapid' growth rate and will reach a height of 5-7 m after 5 years. If the trees are planted if and when consent is granted (i.e. 2025), which I recommend be a condition of consent, it will be around 2032 when Stage 4 is started - assuming each stage takes 2.5 years. This will give the screen planting at least seven years to establish which would be ample time to provide a visual screen between the quarrying activity and any occupants of this property. Using line-of-sight, Stages 1, 2 and 3 will not be visible due to the existing roadside hedge inside the site. As such, the 'Low' adverse visual effects concluded by Ms Metcalf are in my view fair and reasonable.

1056 Railway Road Stage 1 of the Proposal will be potentially visible from 1056 Railway Road some 400 m away. Ms Metcalf finds the effects will be '**Very low**' adverse.

³ Boundary Identification Survey 158 Bealey Road Aylesbury; Mainland Surveying (undated).

⁴ Insofar as the submission included reference to a perceived adverse effect on rural character and amenity.

⁵ The owner/occupier did not submit on the 2011 application but are close to the existing Screenworks operations.

This 1.29 ha property is in the centre of a small cluster of dwellings including 1062 and 1046 Railway Road - all of which include substantial vegetation cover precluding views to the site and future Proposal. Of course, this vegetation cover cannot be relied upon, though in my opinion is likely to remain in place to some degree. If this vegetation was removed, Stage 1 of the Proposal would be theoretically visible from 1056 Railway Road. A young Leyland cypress hedge is currently growing at the south end of Stage 1 and is understood to be approximately 1 m high now according to the LVA. Technically Stage 1 will be visible from 1056 Railway Road for perhaps three - four years while this short line of hedging 'knits together'. However, in my opinion, the combination of intervening roading, railway, neighbouring property at 1062 Railway Road and its mixed vegetation will screen all of the Proposal from view. The other stages would be screened by the existing hedge along Bealey Road within the site. In my view the 'Low' adverse visual effects found by Ms Metcalf are appropriate.

Ms Metcalf notes that some existing tree lucerne will help screen Stage 1. Of note, this tree lucerne is outside the site on council land and cannot be relied upon to stay in place. The reliance on these trees for screening was raised by this property owner in their earlier 2011 submission. Using line-of-sight, the tree lucerne will not screen the Stage 1 activities. Nonetheless, it is important that the status of this planting is clarified by the Applicant as it contributes screening to the consented quarry from this property. The current landscape mitigation plan (7.0) includes no 'back up' screen planting if council did decide to remove this vegetation, which would open up a gap in the perimeter planting.

62 Station Road This 10.46 ha property is located approximately 500 m from proposed Stage 1. Ms Metcalf finds that any adverse visual effects on the occupants of 62 Station Road will be '**Very low**'. From my site visit I agree with this finding due to the dwelling's distance, orientation and the Proposal occlusion from view due to several intervening shelterbelts and vegetation cover. The 'Very low' effects finding I presume allows for the possibility that part of the consented Screenworks operations will be visible from the property entrance as bunding and screen planting is removed to allow for expansion into proposed Stage 1.

Of note, these occupants' 2011 submission was concerned with the '*visual impact on the surroundings*' that the application may generate which I infer to include adverse visual effects beyond their own property. In my view, the visual effects of the Proposal overall are satisfactorily addressed by the recent amendments to the Applicants mitigation strategy following the response to the RFI and so long as recommended conditions are met. This includes a progressive removal of existing bund and shelterbelt planting, delayed as late as possible, combined with early planting, some of which is understood to have already been carried out along the site's boundary with SH73.

In addition, the 2-3 m high bund, proposed to be implemented at the outset to screen Stage 1 from view will be regularly managed in terms of its grass cover to avoid an unsightly appearance and maintain amenity.

23 Bealey Road At present, substantial high amenity planting and a solid railway sleeper fence within this 0.13 ha property screens views to Bealey Road and the site other than at the driveway entrance. From the drive, the existing hedge on the north side of Bealey Road precludes views into the site. Ms Metcalf mentions the existing bund and tree lucerne as a screening element, presumably if the planting along Bealey Road was damaged or removed for any reason. However as discussed above, the tree lucerne is not within the site. Any adverse visual effects felt from this property are considered in the LVA to be '**Very low**'. I agree with this finding. The roadside hedge is not fully mature and over time will 'knit together' further forming a dense 4 m high screen.

The above findings by Ms Metcalf regarding visual effects, which I agree with, are based on intervening screening vegetation being retained in situ, both within the site and on surrounding properties. I consider it unlikely that substantial areas of vegetation would be removed from at least rural residential properties or around farm homesteads as it doubtless provides a high level of amenity value, privacy from road users and valuable wind shelter.

Recommendations

This section of the LVA and later response to the RFI make several recommendations. The former are referred to and relied upon throughout the LVA which are supported in part by sheet 7.0 in Appendix 2. The latter provide additional improvements to the mitigation package, providing more certainty as to the landscape effects. These measures will go some way to mitigating any adverse landscape effects of the Proposal in my opinion to the point where any effects will be acceptable over time for the same reasons that Ms Metcalf finds.

Conclusion

An overall conclusion is reached in the LVA that the Proposal will generate 'Very low' to 'Low-moderate' adverse landscape and visual effects so long as the suite of mitigation measures and recommendations are adhered to. The residual adverse visual effect is due to the mitigation planting precluding open rural views across the site⁶.

In my opinion, the landscape effects or effects on rural character regardless of whether the changes are visible or not, will be slightly higher at 'Low-moderate' while quarrying activities are underway which will substantially reduce when quarrying activity ceases. I agree with Ms Metcalf's findings on the visual effects arising from the Proposal.

To summarise, the LVA is thorough, well set out and the conclusions reached other than with regards to land use and land cover effects are what I consider to be balanced, fair and reasonable given the location of the site, the staged quarry and rehabilitation process coupled with the comprehensive existing and additional screen planting implemented at 'day one'. This will quickly screen the Proposal from public and private view regardless of the staging but will change the site from a partly open site to a fully enclosed one.

I suggest that the various recommendations stated or alluded to in the LVA and subsequent response to the RFI are formalised as recommended conditions of consent (should consent be granted).

Written approvals recommended

On 22 August 2024, via a draft report, I identified the following potentially affected parties from whom written approval would be required.

- 23, 35, 137, 153 and 158 Bealey Road
- 1046, 1056 and 1062 Railway Road
- 10, 18 and 62 Station Road

⁶ See reference to Policy GRUZ-01 in LVA (page 14)

Submissions

Recently I have been asked to provide comment and any recommendations (if necessary) relative to the five submissions received on the application late 2024 and early 2025. Three of the five submissions are not landscape-related. The two that are, are from:

- Lou and Karen Nunn (23 Bealey Road)
- Dion Coleman (53 Bealey Road)

23 Bealey Road has been commented on above at page 6 regarding the findings in the Applicant's landscape effects assessment. The recent submission largely concerns non-landscape matters. However, a valid point is raised concerning the disadvantages of removing various elements previously put in place to help with mitigating the current quarrying activity. While relevant to overall landscape effects, the removal of various landscape elements, enabling the quarry extension is unlikely to be visible from 23 Bealey Road due to the proposed retention of evergreen shelterbelts along Bealey Road and within the site (see Applicants '8.0 Landscape Mitigation Plan – Stages 1 and 2'). Tree species and growth rates are covered above on page 5 where I note: *"The [Leyland cypress] hedging specified in the application has, according to Southern Woods tree nursery in Rolleston - a 'very rapid' growth rate and will reach a height of 5-7 m after 5 years."* As no vegetation is permanent, as the submitter states and may be lost for a myriad of reasons, it is recommended that the conditions set out in the application⁷ are put in place, if consent is granted ensuring any mitigation planting endures for the life of the quarrying activity.

I responded to the potential landscape effects regarding the property at **153 Bealey Road** above on page 5. A point in Mr Coleman's recent submission states: *"Now instead of looking out of the front of our house and seeing nice cropping paddocks or sheep grazing we will be seeing a giant pit of rocks with diggers, loaders and trucks..."* This property is opposite Stage 4 of the site where I understand ground will be broken no sooner than 2032. Before this occurs, the proposed extension to the Bealey Road shelterbelt, which would be planted at time of consent will have established sufficiently to screen views from 153 Bealey Road into the site. And so, in the short to medium term, the views from this property across grazed paddocks within the western end of the site will continue unchanged until the shelterbelt extension has established.

The submission also seeks a 5 m high earth bund, planted in native species along Bealey Road in addition to an extended shelterbelt – which as discussed above is already proposed. In my opinion, such a tall structure is not necessary. The proposed shelterbelt is proposed to be maintained at a height of 4 m which will be able to be achieved before Stage 4 quarrying commences. This in my opinion will be sufficient to screen views of the proposed activity, while maintaining adequate levels of sun and light into the road corridor.



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Registered NZILA Landscape Architect

20 January 2025

⁷ Glasson Huxtable Landscape and Visual Assessment of Effects; Part 10 Recommendations (page 27).