

Selwyn District Council
PO Box 90
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New Zealand

30 October 2024

Attention: Andrew Henderson

Dear Andrew

Wheatsheaf Quarry Resource Consent Application - Landscape and Visual Assessment Peer Review

Following our initial peer review of the LVIA received as part of the Wheatsheaf Quarry resource consent application, we have received amended LVIA documents from the Applicant. The following is a review of those amended documents (prepared by DCM Urban), which sets out key matters from the initial review, where they have been addressed in the updated LVIA report and appendices, and whether there are any outstanding issues to be addressed in providing an appropriate assessment of landscape and visual effects of the proposal.

The documents reviewed include:

- Landscape Visual Impact Assessment, Revision E, 18 October 2024
- Appendix 1 – LVIA Methodology
- Appendix 2 - Landscape and Visual Impact Assessment Figures, Revision D, 16 October 2024

Peer Review Further Response

The General Findings (Section 3) of the initial peer review found that the LVA Report lacked a clear methodology and coherency in drawing its conclusions. Refinement to the assessment and appendices was requested¹ to address two primary issues:

- 3.1 The 'base' methodology provided in Appendix 1 of the LVA Report is inconsistent with best practice guidance in several areas, and those aspects of the base methodology that underpin the LVA Report are not clearly identified; and*
- 3.2 As a result of the above, it is unclear how the LVA Report has reached its conclusions regarding degree of landscape and visual effects.*

¹ Wheatsheaf Quarry Extension LVA Peer Review, Beca Ltd, 23 September 2024 – Section 3 General Findings

The Specific Commentary section of the Peer Review² listed detailed issues to be addressed. The response to these issues is evaluated below, *with emphasis added and **unaddressed matters** identified.*

4.1 Methodology (Appendix 1: Landscape and Visual Impact Assessment Methodology)

- a. Although referenced in the LVA report (Appendix 1), no methodology was included with the Application (this was requested from DCM separately).

An updated methodology statement has been provided both in the report and as an attached A4 Appendix. The content is addressed further below.

- b. Section 2 of the LVA Report states that the methodology for assessment is provided in Appendix 1. The opening paragraph of Appendix 1 states that the methodology is based on accepted industry guidance, however there are several examples to the contrary.

The updated report has provided some clarifications about the method and approach to the assessment in Section 2, Methodology. Steps of the method are outlined, under the following headings:

- Desktop Research and Site Surveys
- Landscape Character and Visual Context Analysis
- Impact Evaluation
- Mitigation Measures
- Photography Methodology
- Statutory Documents

Two points of concern remain:

- i. ***The use of the NZILA scale to assess the magnitude of change³. The assessment scale provided in the NZILA guidelines provides a measure of effect, not the magnitude of change. This recognises that change in itself does not necessarily equate to an effect on landscape values.***
- ii. ***Appendix 1, 3.4 Evaluation of Residual Effects. This section of the Methodology introduces a different scale (taken from the Quality Planning website) to the NZILA guideline, which introduces planning terminology without reference to its purpose, relevance, or how it relates to the NZILA guideline.***

The reason for highlighting/labouring this issue, is that a key function of a peer review is to establish whether the methodology that underpins an LVIA is clear, based on accepted industry practice and is fit for purpose in the context of the proposal.

- c. The LVA Report does not provide any commentary on how the information provided in Appendix 1 is relevant to the report itself. Aspects of method are woven through the introduction/proposal section. Ideally a clear statement (i.e. paragraph/ section) would set out those key aspects of methodology that specifically relate to this assessment. For example, Natural Character is discussed in the methodology, yet it has no material relevance to the proposal or the relevant landscape setting. In fact, RMA Section 6 matters are not relevant to the assessment at all.

² Wheatsheaf Quarry Extension LVA Peer Review, Beca Ltd, 23 September 2024 – Section 4 Specific Commentary

³ Landscape Visual Impact Assessment, Revision E, 18 October 2024 – Page 4, Section 2. Methodology, Bullet point 3

Amendments have been made to Section 5. Statutory Provisions outlining the relevant statutory documents. The activity status is confirmed as a discretionary, with a response to the relevant District Plan Objectives and Policies.

- d. Appendix 1 outlines that the assessment of effects shall be undertaken against existing landscape values (Section 1.2), yet the report does not clearly identify those values for an assessment of resulting effects to be undertaken. It is relevant to note that an assessment of effects on landscape values, is not the same as an assessment of change to landscape attributes/characteristics.

The site-specific landscape values are still not clearly outlined. The methodology states: “The site’s biophysical, sensory, and cultural landscape attributes were analysed, including natural and human-made features, sensory qualities, and associative cultural values.” However, this analysis is not clearly described in the assessment, nor are the key values summarized in a way that enables the reader to clearly understand where substantive effects might result.

- e. Effects Methodology (Appendix 1, 3.0)

- i. The LVA Report does not provide a pre and post-mitigation assessment of landscape effects, nor does it state why pre-mitigation effects have been omitted.

The report now states⁵ the reasoning for the use of the term ‘mitigation measures’ and that these measures are to be considered part of the proposal. Accordingly, the decision maker/s may consider these measures for avoidance of effects as they are inherent in the proposal.

- ii. Interpretation and use of scales not consistent with the NZILA Guidelines. The ‘7-point scale’ relates to the assessment of nature and degree of effect on landscape values, not the magnitude of change on specific landscape attributes.

Refer to 4.1 b. i.

- iii. The quantification of change (using the NZILA scale) provided in the LVA Report is written in a way that focusses on visual effects, omitting other sensory, physical and associative aspects which should be considered. If ‘visual effects’ are the only relevant assessment matter in this case, then the LVA Report should have clearly established this scope at the beginning of the assessment.

Refer to 4.1 d.

- iv. Clear findings on actual and potential effects are lost in the discussion of ‘sensitivity’ and ‘magnitude of change’ and attempting to quantify these. As above (e(ii)) the assessment should consider the actual nature and degree of effect on the landscape values (embodied by certain attributes) and explain with reasons.

Refer to all above

- v. The effects continuum uses planning terminology from the QP website in favour of the terminology and scale provided in section 6.17 – 6.21 of the NZILA Guidance document. The

⁴ LVIA Report – Page 4, Section 2. Methodology, Bullet point 2

⁵ Ibid – Page 5, Para 2

LVA Report does not explain its relevance, or the specific statutory setting or RMA situation which has triggered its use (i.e. the Discretionary status of the proposed activity).

Report wording has been edited to reflect the scale included in the methodology.

f. Photography methodology (Appendix 1, 4.0)

- i. This section provides a general reference to acceptance industry guidance documentation.

This section has been removed from the Appendices, with detail moved to Section 2.0 Visual Assessment Methodology. There are some inconsistencies with the best practise guidance, in particular, the representation of views. This is discussed further below.

- ii. The methodology states that four photos will be used to form the panoramic images provided, yet the information provided on the photography sheets state that five images have been used.

Camera used: Sony ILCE-6000 (APS-C type Sensor (23.5 x 15.6mm)) with 50mm lens.

With this sensor, a single frame (oriented in portrait) would capture approximately 11.8 degrees Horizontal Field of View (HFOV) and 31 degrees Vertical Field of View (VFOV). The use of 4-5 frames means that the HFOV in the images provided would be a maximum of 45 – 55 degrees (allowing for overlap between images), which is significantly less than the ‘accepted human field of view’ that is depicted in the industry guidance. To achieve a HFOV closer to the (circa) 120 degrees depicted in the industry guidance, approximately 12 single frames would be required.

Additionally, the printed size of an image is independent of the focal length of the camera lens⁶. The imagery in Appendix 2 has been scaled to fit a consistently sized frame on the A3 sheet layout and is therefore no longer representative of the fixed focal length or a set viewing distance.

- iii. The methodology needs to confirm the **field of view** for each of the images provided.

This information has been included for HFOV, but inaccurately represented. Refer to 4. f. ii.

- iv. The methodology needs to confirm reader **viewing distance** and provide a more detailed viewpoint location map on each sheet.

This information has not been included. Refer to 4. f. ii.

- v. The photography provided for VP6 – View northwest from 90 Selwyn Road is focused on the gate in the foreground. Midground and distant features are not well represented in this image.

This image has been updated, however appears to be quite ‘zoomed in’. Refer to comments above regarding the preparation of visual material.

4.2 Relevant Statutory Provisions

- a. RMA Section 6 matters are not relevant to this assessment.

Section 5 of the assessment report has been amended appropriately.

- b. This section should summarise the activity status, rule triggers i.e. reason for the assessment, to frame the assessment of effects.

⁶ LVIA Report – Section 5.8, pg 10

Section 5 of the assessment report has been amended appropriately.

- c. This section should also establish to what extent quarrying activities are provided for in the Selwyn District Plan and the resulting landscape matters to be addressed (e.g. physical landscape effects).

Section 5 of the assessment report has been amended appropriately.

4.3 Extent of relevant receiving environment

The LVA Report does not clearly establish the relevant physical setting (i.e. site, local and/or broadscale landscape context) and uses various terms to describe the locations of characteristics including 'receiving environment', 'wider receiving environment', 'overall area' making the character summaries challenging to validate. The AEE identifies nine 'sensitive receptors' within 250m of the site boundary which may be affected by the proposal.

- a. While landscape values are not summarised, character is described as: *"highly legible rural character and land use"* which is a very broad statement and does not reflect which site-specific attributes underpin those values that are potentially at risk as a result of the proposal.

Refer to 4.1 d.

- b. Describe the sensory qualities and amenity values of the relevant landscape context, outlining the landscape attributes which these are underpinned by.

Refer to 4.1 d. Some sensory qualities have been mentioned in section 3 relating specifically to the existing quarry activities.

- c. The existing visual catchment and nature of existing views are described in section 4.3 Effects on Visual Amenity. Ideally this descriptive information should be in section 3, where the existing environment is described.

No change in report – not critical

- d. The relevant visual catchment for assessment of effects is defined as being within 1000m of the edge of the proposed quarry extension⁷. However, the selection of viewpoints does not represent any views from this distance, with the furthest view from the site being at approximately 550m. Site visit observations suggest that the properties at 8 Selwyn Road and 75 Selwyn Road may have views to the site, yet these properties have not been included in the visual assessment.

No further reasoning has been provided for excluding these properties from viewpoint considerations and no further commentary is made as to the appropriateness of the catchments site despite not representing any views from this distance.

4.4 Detail of the Proposal relevant to landscape effects

To provide clarity on the extent of potential change in the receiving environment, the following additional information (with focus on elements which may affect the physical, sensory or associative qualities of landscape) should be outlined and included in the assessment:

- Operational works, including operational 'life cycle'
- Rehabilitation works
- Establishment phase works

⁷ LVIA Report, Section 4.3, pg 10.

- Bund construction and timing, including confirmation of future removal (i.e. timing and extent of removal), which is mentioned in the AEE
- Robinsons road access formation
- Design integration measures (landscape concept design, other management plans included with the proposal)

The report provides some additional information and references to the operational works, rehabilitation plan and establishment works and bund construction. The proposed mitigation measures are to be considered as part of the proposal and effectively design integration measures.

No further information has been provided regarding the Robinsons Road access formation. This information would help to understand the potential effects on 663 and 679 Robinsons Road.

4.5 Assessment of Effects

- a. The LVA Report does not clearly and thoroughly analyse the effects on landscape values. Although the long-term proposed outcomes for the site are clear, an assessment of short-term effects in the construction/establishment phase has not been provided. Additionally, the nature of changes and resulting effects related to the new access road are also omitted.

No new analysis has been provided in the amended report.

- b. The LVA Report does not assess the potential adverse 'physical' and 'associative' effects or effects on 'sensory' values, outside of visual. The methodology provided in Appendix 1 to the LVA Report highlights physical, sensory and associative aspects being relevant to the description of the landscape and subsequent assessment of effects. It is accepted that some of these aspects/ attributes are not relevant in certain settings, and the LVA Report should clearly identify and explain why this may or may not be the case.

For example, if a cultural assessment has been undertaken for a particular project and has established that the site holds no value to mana whenua, then it is entirely appropriate to omit these associative values from the assessment. Similarly, if a proposal was completely 'hidden' from view for residents and the public alike, then an assessment of visual effects may not be necessary.

No new analysis or reasons for omissions has been provided in the amended report.

- c. The LVA Report outlines mitigation measures in section 5. However, the commentary throughout the report suggests that these measures are part of the proposal. If they are mitigation measures, then a pre and post-mitigation assessment of effects should be provided, as outlined in the methodology (and consistent with best practise). If these measures are inherent to the proposal, then they should be described as part of the proposal itself and it may be that a pre-mitigation assessment is not required.

The amended report confirms that 'mitigation measures' are to be considered as part of the proposal (design integration/avoidance measures) and therefore a pre and post mitigation assessment is not required.

5 Recommendations

- a. Revise the LVA Report in line with the commentary above. Specifically:

- i. Provide a revised methodology and clear statement within the LVA Report that establishes the scope of the assessment, and clarity of method, consistent with best practice guidance⁸.

Partially resolved.

- ii. Reproduce imagery on Appendix 2, Sheet 11, VP 6 – View northwest from 90 Selwyn Road

Resolved. New issues arising – refer to 4.1 f.

- iii. Provide a summary of the activity status and scope of the assessment as it relates to relevant statutory framework. Alternatively, cross reference the relevant section of the AEE.

Resolved

- iv. Provide a clear summary statement of the specific *landscape values* that effects are to be assessed against. The nature of these values should be tied to those physical, sensory and/or associative values that are relevant to the proposal.

Unresolved

- v. Provide further detail on the Proposal as outlined in Section 4.4 above, including details regarding any enabling works, site access and timing of any landscape design/ mitigation works (e.g. bunding and planting)

Partially resolved

- vi. Provide a pre-mitigation assessment of effects of measures which are recommended as conditions to the consent.

Resolved

- vii. Provide an effects assessment which considers the actual nature and degree of effect on the landscape values (embodied by certain attributes) and explain with reasons.

Unresolved

Summary

The revised Landscape Assessment has not fully resolved issues raised in the initial review. Based on the commentary above this further response finds the LVIA:

1. Does not follow a sound methodology that is clearly described as 'fit for purpose' based on the nature of the proposal.
2. Does not accurately describe, interpret, and evaluate the relevant landscape character and values.
3. Has omitted 8 Selwyn Road and 75 Selwyn Road from the effects assessment without reason, despite being within the identified viewing catchment.
4. Has omitted details regarding the Robinsons Road access formation which would help to understand the potential effects on 663 and 679 Robinsons Road.
5. Does not analyse the effects on landscape values (for proposal-driven assessments) in a balanced and reasoned way, and therefore;

⁸ Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (NZILA, 2022)

6. Overall, the assessment does not reach credible findings on the actual and potential effects on the landscape that are clearly supported by reasons.

Yours sincerely,



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on behalf of

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