

Selwyn District Council
PO Box 90
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New Zealand

23 September 2024

Attention: Andrew Henderson

Dear Andrew

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

1 Introduction

Beca Ltd have been engaged by Selwyn District Council (SDC) to peer review the landscape and visual assessment report (the LVA Report) accompanying the Resource Consent application for a Quarry at 50 Selwyn Road, Selwyn. The LVA Report was prepared by DCM Urban Design Ltd (DCM) and dated 25 June 2024 (revision B).

Other contextual information from the Assessment of Environmental Effects (AEE) has also been considered as part of the peer review process, including:

- Appendix 1: Landscape and Visual Impact Assessment Methodology by DCM
- Appendix 2: Landscape and Visual Impact Assessment Figures, Rev C, 25 June 2024 by DCM

2 Peer Review Methodology

The scope of this peer review reflects the guidance provided in sections 6.57 to 6.63 of Te Tangi a te Manu, Aotearoa New Zealand Landscape Guidelines¹ (the NZILA Guidelines).

It is an appraisal of the LVA Report, including whether an appropriate methodology has been applied and a clear assessment of actual and potential landscape and visual effects of the proposal has been provided. It is not an alternative or parallel assessment.

As outlined in the NZILA Guidelines², should the review find that the assessment method is not sound, or the assessment does not follow its stated method, or the findings are not credible, or there are gaps that are germane to findings, then additional assessment of part (or all) of the principal assessment may be warranted. Where this is the case, an explanation and reasons for further assessment will be provided.

¹ Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (NZILA, 2022)

² Ibid, 6.60

A site visit was undertaken on 16th September 2024, to gain an appreciation of the character of the subject site and the wider landscape, to appraise the relevant visual catchment, and validate the graphic material provided the LVA Report.

3 General Findings

This peer review finds that the LVA Report lacks a clear methodology and coherency in drawing its conclusions. The remainder of this report sets out the issues and recommended responses that would remedy these issues.

Notwithstanding this overall finding and the recommended areas for improvement of the LVA Report, on site observations would suggest that ultimately, the conclusion that “...*the effects on landscape character and values will be **less than minor***” is likely reasonable in the long term once the proposed mitigation measures are in place. Short term effects are less clear based on the information provided in the LVA Report.

How the LVA Report author has arrived at this conclusion is the main point of contention, and additional refinement is required to address two primary issues:

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
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.

The following sections provide specific commentary on whether the LVA Report:

- Follows a sound methodology and adopts a clear method for the purpose of the assessment,
- Considers the relevant statutory provisions,
- Accurately describes, interprets, and evaluates the relevant landscape character and values,
- Describes all aspects of the proposal, including timing of works and design measures,
- Analyses the effects on landscape values (in a balanced and reasoned way),
- Reaches credible findings supported by reasons,
- Makes appropriate recommendations with respect to findings.

4 Specific Commentary

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 Application (this was requested from DCM separately).
- 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 guidance³, however there are several examples to the contrary.

³ Ibid

- 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.⁴
- 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.
- 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.
 - ii. Interpretation and use of scales not consistent with the NZILA Guidelines⁵. The '7-point scale' relates to the assessment of nature and degree of effect on landscape values, not the magnitude of change on landscape attributes⁶
 - 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.
 - iv. Clear findings on actual and potential effects are lost in the discussion of 'sensitivity and 'magnitude of change' and attempting to quantify these⁷. 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 reasons⁸.
 - 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 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)⁹.
- f. Photography methodology (Appendix 1, 4.0)¹⁰

⁴Ibid, 9.01 and 9.58

⁵ Ibid, 6.03

⁶ Ibid, 6.20

⁷ Ibid 6.43

⁸ Ibid, 6.44

⁹ Ibid, 6.38

¹⁰ Ibid, 6.52

- i. This section provides a general reference to acceptance industry guidance documentation¹¹.
- 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.
- iii. The methodology needs to confirm the **field of view** for each of the images provided.
- iv. The methodology needs to confirm reader **viewing distance** and provide a more detailed viewpoint location map on each sheet.
- 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.

4.2 Relevant Statutory Provisions

- a. RMA Section 6 matters are not relevant to this assessment.
- b. This section should summarise the activity status, rule triggers i.e. reason for the assessment, to frame the assessment of effects.
- 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).

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'¹² 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.
- b. Describe the sensory qualities and amenity values of the relevant landscape context, outlining the landscape attributes which these are underpinned by.
- 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.
- d. The relevant visual catchment for assessment of effects is defined as being within 1000m of the edge of the proposed quarry extension¹³. 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.

¹¹ NZILA Education Foundation - Best Practice Guide – Landscape Assessment and Sustainable Management/ Best Practice Guide – Visual Simulations (2.11.10)

¹² AEE, pg 57, Figure 05

¹³ LVA Report, Section 4.3, pg 10.

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
- 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)

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.
- 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.

- 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.

5 Recommendations

The following recommendations would provide the basis for a thorough peer review of the assessment and consideration of whether the conclusions made regarding landscape and visual effects are fair and reasonable:

- 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 practise guidance¹⁴.
- ii. Reproduce imagery on Appendix 2, Sheet 11, VP 6 – View northwest from 90 Selwyn Road
- 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.
- 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.
- 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)
- vi. Provide a pre-mitigation assessment of effects of measures which are recommended as conditions to the consent.
- 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.

Yours sincerely,



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on behalf of

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¹⁴ Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (NZILA, 2022)