

# Isthmus.

## MEMO: FURTHER INFORMATION RESPONSE FOR THE ALLIED ASPHALT LANDSCAPE ASSESSMENT TECHNICAL REVIEW

11 April 2023

### Introduction

1. Allied Asphalt Limited (AAL) have applied for Resource Consent to replace an existing asphalt plant with a new plant, utilising updated and cleaner technology at 54 Aerodrome Road, Mount Maunganui.
2. Isthmus prepared a Landscape and Visual Assessment (LVA) to accompany the Assessment of Environmental Effects (AEE) for the applications. Tauranga City Council have commissioned a Technical Review of the LVA. The author of the Technical Review has visited the site and undertaken site visit to the surrounding area of the application. I have reviewed the Technical Review which has asked for some additional assessment to be included to complete the LVA.

### Technical Review

3. The Technical Review is largely in agreement with the LVA in relation to the potential adverse visual effects of the asphalt plant where it concludes very low adverse visual effects on the Whareroa marae complex<sup>1</sup>, very low neutral visual effects on the surrounding industrial complex<sup>2</sup>, very low neutral visual effects from the closest residential areas<sup>3</sup> and very low adverse visual effects as a result of the plume from the stack<sup>4</sup>.
4. In summary for the viewing audiences identified in the LVA, the Technical Review is in agreement with the conclusions reached.
5. The Technical Review has identified adverse cultural effects of the application which it identifies as having not been assessed in the LVA. The Technical Assessment covers the cultural landscape effects at paragraphs 5, 14 and 23.

### Further Information Response

6. The LVA has provided a description and assessment of the direct visual effects on the Whareroa Marae complex<sup>5</sup> and the Tahuwhakatiki Marae viewing point<sup>6</sup>. The Technical Assessment has agreed with the assessment and conclusions<sup>7</sup> within the LVA of the effects of the proposal on these cultural sites.

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<sup>1</sup> Paragraph 16.

<sup>2</sup> Paragraph 17.

<sup>3</sup> Paragraph 18.

<sup>4</sup> Paragraph 19.

<sup>5</sup> Paragraphs 48-50.

<sup>6</sup> Paragraphs 65-66.

<sup>7</sup> At paragraphs 89 and 94 of the LVA.

7. Mana whenua have responded to the application and consider the effects of the activity to be significant and adverse because the activity is seen as contributing to the cumulative adverse effects of industrial uses in the Mount Maunganui Industrial area that already exceed a culturally acceptable level, given the status of the Mount Industrial Area as a polluted airshed. This is noted at Paragraph 5 of the Technical Assessment and appears to be the main reason for requesting additional assessment of the effects of the application on the cultural landscapes of the area.
8. The Mana whenua response to the application specifically refers to cultural effects on the Mount Maunganui Industrial polluted airshed. This is not specifically a landscape issue (in the sense that I do not have the specific qualifications or experience to make an assessment of the effects on an airshed), however I do understand the Te Ao Māori concept<sup>8</sup> of Te Taiao and the inter-relationships of whenua (land), wai (water), ahuarangi (climate) and koiora (living beings). I also understand the significance of the historical land confiscations in the wider Te Papa and Mount Maunganui areas and the desire to redress the confiscations.
9. The most identifiable cultural landscape features and sites in the Mount Maunganui area include Mauao, Matakana Island, Te Awanui (Tauranga Harbour), including Te Paritaha, Moturiki Island (Leisure Island), Motuotau Island, Hopukioire (Mount Drury) and Mangatawa. Local cultural sites of marae and kainga include the Whareroa marae complex and kainga, Waikare Marae (Matapihi), Hungahungatoroa Marae (Matapihi), Maugatapu Marae and Tama Pahore Marae (Mangatawa). All of these features and sites have an interconnected relationship to each other and form part of a wider cultural landscape of the southern Te Awanui area. The viewshaft towards Mauao from the Tahuwhakatiki Marae viewing point is also considered as part of the cultural landscape considerations.
10. Specific visual effects on the Whareoa Marae and the Tahuwhakatiki Marae viewing point have been described and assessed above.
11. In relation to the other cultural landscapes and cultural sites of marae and kainga, the asphalt plant at 54 Aerodrome Road is either not visible from these locations or it is at such a distance that it cannot be readily discerned from other industrial development in the area. It will not have an adverse effect on any views of or from these cultural sites. The physical effects of the proposal will not extend outside of the boundaries of the site.
12. In relation to the main cultural landscape features, such as Mauao, Matakana Island, Te Awanui and the complex of landscape features along the coastal edge, the site at 54 Aerodrome Road and the application to develop the technologically advanced asphalt plant does not interfere with the relationship between these features or interrupt any visual or physical connections between them. The main objective of the marae viewpoint protection provisions, including the Tahuwhakatiki Marae view point height restrictions is to ensure that development does not intrude into the visual connection between the origin of a view shaft (Tahuwhakatiki Marae) and Mauao. These provisions are cultural landscape protection provisions embedded into the Tauranga City Plan. Protection of views of Mauao from cultural sites through the wider Tauranga area is a specific focus of the City Plan. As assessed in the LVA, the highest point of the asphalt plant is over 4m below the floor of the Tahuwhakatiki Marae protected viewshaft.

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<sup>8</sup> Māori world view.

13. From an expert landscape assessors' perspective<sup>9</sup> and taking into account the areas identified above, the cultural landscapes and cultural sites of the Mount Maunganui area do not appear to be at risk of any adverse visual or physical effects from the proposed asphalt plant application.
14. While I do understand the Mana whenua opposition to the application in relation to not consolidating or confirming further industrial development in the Mount Maunganui area into the future, this opposition appears to be 'in principle' and is not related to any specific landscape effects that would result from the application. I understand that the updated and technically advanced asphalt plant could lead to positive environmental outcomes in relation to the discharge of contaminants into the Mount Maunganui airshed. The concerns of Mana whenua appear to be mainly concerned with the airshed of the area.

### **Conclusion**

15. From an expert assessors' perspective, the site-specific nature of the asphalt plant application, in conjunction with the limited height and footprint of the structure, the distance from any natural or cultural landscape features and the lack of visibility of the plant from any marae or kainga sites, ensures that the application can have no visual or physical effects on the cultural landscapes of the Mount Maunganui and southern Te Awanui area. Having said that, I do understand the 'in principle' opposition that is being advanced by Mana whenua to the application.

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11 April 2022

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<sup>9</sup> As compared to a Mana whenua perspective.