



Memorandum

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Attention: Danielle Petricevich, Principal Consultant Planner, 4Sight Consulting

Date: 21/03/2023

From: Julia Wick, Principal Landscape Architect

Applicant: Allied Asphalt Limited (AAL)

Site: 54 Aerodrome Road, Mount Maunganui

Proposal: Application for technically advanced asphalt plant to replace an existing asphalt plant at 54 Aerodrome Road, Mount Maunganui.

Dear Danielle,

Introduction

1. Boffa Miskell Ltd (BML) were engaged by Tauranga City Council to undertake a technical review on the above application from a landscape and visual effects perspective. I am familiar with the Mt Maunganui and have undertaken a number of reviews in the locality and wider Tauranga / Bay of Plenty area. In addition to the review of the application documents a site visit was undertaken to the subject site and wider environment accompanied by the applicant's landscape architect (Brad Coombs) on 16 March 2023, including to the location of the simulation viewpoints.

Relevant application material reviewed

2. I have reviewed the following application material (considered relevant to Landscape matters):

Submitted with the original application

- *"Assessment of Environmental Effects"*, prepared by Craig Batchelar, Cogito Consulting Ltd, dated December 2022;
- *'Landscape and Visual Assessment Report – including Appendix B Graphic Attachments'* prepared by Isthmus, dated December 2022;
- *"Description and Operation of Plant & Associated Processes"*, author unknown;
- *"Technical memo – Asphalt Plant Selection Process"*, Prepared by Fulton Hogan, dated 11 January 2022.

3. This Peer Review ('the review') of the Landscape and Visual Assessment Report ('the Assessment'), addresses the following key questions¹:
 - a) Has the assessment been undertaken in accordance with NZILA best practice?
 - b) Is the methodology appropriate?
 - c) Do you agree with the conclusions?
 - d) Is any further information required?
 - e) Do you recommend any consent conditions?

4. The Assessment is generally set out according to recognised landscape assessment methods in accordance with Te Tangi A Te Manu Aotearoa New Zealand Landscape Assessment Guidelines (July 2022). The Assessment adopts a seven-point scale of effect which ranges from Very Low to Very High.

5. Te Tangi a te Manu provides a framework for assessing landscapes from both Te Ao Māori and Te Ao Pākehā perspectives within the statutory planning context. It is noted that the Landscape Assessment prepared by Isthmus does not address the Te Ao Māori perspectives or cultural landscape values of the site or wider context. The application AEE has indicated that engagement has begun and is ongoing. Through this process Mana whenua has stated the effects of the activity to be significant and adverse because it 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. In this vein, it would have been beneficial if the landscape assessment addressed the cultural landscape values as they relate to the site and wider landscape context or to have included a written statement as to why this assessment was omitted. It is not known if a cultural impact assessment or cultural values assessment has been undertaken for this project. Without this information or direct reference in the landscape assessment it is difficult for me to provide further commentary on this matter.

6. The existing Site and Landscape Context is well described, with the existing asphalt plant, site and the surrounding context. This is further supported through the use of graphic illustrations, simulations, maps and site photography. There are a number of viewpoints and simulations included in the report and these are discussed throughout. These viewpoints are considered to be comprehensive and assist with the understanding of the site context and proposal. The simulation methodology is included in Figure 14, Appendix B. All simulations and photography have been undertaken in accordance with NZILA best practice².

7. The Proposal is summarised within the assessment, with a more holistic description provided within the application AEE. In summary Allied Asphalt Ltd (AAL) is applying for resource consent to construct and commission a replacement asphalt plant on its leased site adjacent to the Fulton

¹ Refer project brief dated 07 March 2023, Danielle Petricevich 4Sight

² NZILA, Best Practice Guide, Visual Simulations BPG 10.2
https://nzila.co.nz/media/uploads/2017_01/vissim_bpg102_lowfinal_gQFss9X.pdf

Hogan yard in Aerodrome Road, Mount Maunganui. It is noted that AAL has undertaken a review of site alternatives and key information on this process and outcome is provided in the application AEE (section 9.0).

8. The key elements of the proposal as they relate to landscape and visual matters include:
 - A new, low-energy, asphalt plant. The plant will broadly include the following:
 - A stack to approx. 27.605m
 - A hot stone elevator to approx. total height of 25m
 - A RAP Elevator to approx. 23.778m
 - Various other features including bins, silos, tanks between 5m – 19m in height.
 - Multiple small scale buildings and storage areas to facilitate site operations.
 - Areas for the storage of material and aggregate bays.
 - Site access will be gained via the vehicle access through 48 Aerodrome Road.
 - The site boundaries will be fenced for security.

Statutory Context

9. The assessment provides a detailed description of the statutory context relevant to landscape, and visual matters. This includes the Resource Management Act (1991) and Tauranga City Plan (TCP).
10. It is acknowledged that the site, location of the proposal and surrounding landscape is not identified as either Outstanding Natural Landscape or Feature (ONF/L). The closest outstanding Natural Feature or Landscape are the Tauranga Harbour and Estuaries approximately 1km to the northeast of the site.
11. The site is located within the Industry Zone and is surrounded by Industry Zone land in the TCP. The TCP contains a series of protected viewshafts from marae within the District towards Mauao. The site is within the protected viewshaft of Mauao from the Tahuwhakatiki Marae viewing point. The View shaft protection map indicates that the floor of the viewshaft protection is 16 metres above the permitted height limit for the Industry Zone on the site. The permitted height limit is 16 metres, leading to a view shaft protection floor of 32 metres above the site. The tallest part of the asphalt plant is 27.6 metres at the top of the flue, within the 32 metre viewshaft protection limit. It would be useful to include a photo from this Volcanic Viewshaft origin point as reference material in the graphic supplement.

Landscape and Visual Effects Assessment.

Landscape Character

12. The existing landscape character of the broader and local context is described in paragraphs 10 - 24, including reference to a number of photographs and figures. The site is located within the industrial zone and surrounded by industrial zones. It is flat and low lying, with no discernible

landform features. There are a number of taller structures within the surrounding area including the Port of Tauranga with cranes at 100m+ tall, the Lawter chemical processing tower (Totara Street) at 37m tall and the six lighting towers at the Bay Cricket Oval, at 51 metres tall.

13. Paragraphs 39 - 45 undertake an assessment of effects of the proposal on this identified landscape character. The report concludes that the proposal will have very low (neutral) effects on the existing landscape character of the Aerodrome Road area as the proposed asphalt plant is located within the Industrial Zone, is located within an area of wider Mount Maunganui Industrial area and although the height of the proposal does exceed the permitted height, it will be seen within an industrial context and the character of the site will remain consistent with the surrounding land uses.
14. As mentioned in paragraph 6 above, the Landscape Assessment prepared by Isthmus does not address the Te Ao Māori perspectives or cultural landscape values of the site or wider context. The assessment focuses largely on the existing landscape character of the site and further assessment should be provided in relation to the historical, associative and cultural values of this landscape and how this relates to landscape character and effects of this proposal. In this vein, it would have been beneficial if the landscape assessment addressed the cultural landscape values as they relate to the site and wider landscape context and character or to have included a written statement as to why this assessment was omitted (to ensure it is aligned with best practice Te Tangi a te Manu) (e.g., covered in a cultural values or cultural impact assessment / or considered to be outside of the realm of expertise etc).

Visual Amenity

15. The potential visual effects of the proposal have been identified as being limited to:
 - (i) *Local residential areas,*
 - *The closest marae complex at Whareroa on Taiaho Place,*
 - *Residential areas to the northeast of the site,*
 - (ii) *Public viewpoints within the immediate and localised setting of the site,*
 - *Local industrial roads, including Jean Batten Drive and Aerodrome Road.*
 - *Elevated viewing locations, such as the Hewletts Road Flyover*
 - (iii) *Plume, and*
 - (iv) *Lighting and glare.*

Views from Whareroa marae.

16. The LVA has provided assessment of the visual effects from the Whareroa Marae, supported with a visual simulation on Taiaho Place (at the road near the Marae). It is not clear from the assessment if the author undertook a site visit onto the Marae grounds, however during my site visit I drove onto the carpark area of the Marae to ascertain visibility. The subject site is screened by vegetation that surrounds the Marae and is approximately 1.4km away. This simulation Figure 6 (Viewpoint 1) and

demonstrates the asphalt plant will be barely visible from Taiaho Place and therefore not visible from the Whareroa Marae. Visual effects are assessed as very low, I concur with this assessment.

Views from surrounding industrial context

17. The visual effects have been assessed from aerodrome Road, Jean Batten Drive and Hewletts Road Flyover. In these views the proposed asphalt plant will be clearly visible, it is however seen largely in the context of the industrial area with a number of other light industrial buildings. Together with the plant being well set into the Site, visual effects are assessed and very low (neutral). I agree with this assessment.

Views from the residential area northeast

18. The visual effects from the closest residential area (some 660m to the northeast of the site) have been assessed. The proposal will generally not be visible from this location due to intervening built form. If it can be seen this will be at a distance of 660m. Visual effects are assessed as very low (neutral). I agree with this assessment.

Plume

19. Visual effects of the proposed plume have been outlined in the application LVA, it is difficult to ascertain from the information provided when the plume will be visible, however I acknowledge that visibility of the plume relates largely to atmospheric conditions and will generally be when the plant is operating. In addition, it would have been useful for the plume to be modelled within the visual simulations for consistency. The report concludes that there will be very low adverse effects on the visual amenity of the immediate and localised setting as the plume will only be visible at times when the plant is operation, the plume shadow will only be intermittent and visible water vapour and air plumes is common in the local area, I agree with this assessment.

Lighting

20. In addition to the plume lighting effects of the proposal are accurately addressed in the assessment. With lighting a common element of the Mount Maunganui industrial area, including lighting for night work. Recommendations around lighting and to ensure safe operation and flood lights being limited to back screens and restricted from site boundaries is recommended.

Recommended Conditions

21. The application LVA makes two recommendations in relation to the lighting design for the proposal and the colour of the proposal. The lighting strategy will include flood lighting to ensure safety on site, these however will be fitted with back screens which restrict lighting to within the site boundaries, reducing light spill outside of the site. It is further recommended that the plant be

finished in Resene Jumbo, a mid-colour low LRV rated grey. I agree with these and recommend they be included in a condition of consent should TCC be minded to grant consent.

Conclusion

22. The proposal is well documented with relevant material considered. I agree with the conclusions reached in the landscape and visual effects assessment that the exceedance of the 18m height standard of the Industry Zone will not be a prominent feature within the environment. Where visible, the proposal will be seen within the context of the surrounding industrial landuses and structures, including the wider Mount Maunganui Industrial area and the Port of Tauranga.
23. It is noted that one shortfall of the assessment is it does not address the Te Ao Māori perspectives or cultural landscape values of the site or wider context. The application AEE has indicated that Mana whenua have stated the effects of the activity to be significant and adverse because it is seen as contributing to the cumulative adverse effects of industrial uses in the Mount Maunganui Industrial area to a culturally unacceptable level. It would have been beneficial if the landscape assessment addressed the cultural landscape values as they relate to the site and wider landscape context or to have included a written statement as to why this assessment and commentary on this matter was omitted. It is not known if a cultural impact assessment or cultural values assessment has been undertaken for this project. Without this information or direct reference in the landscape assessment it is difficult for me to provide further commentary on this matter. I am happy to provide further review in this regard should more information be provided from the applicant team.
24. I trust that the above technical review provides you with enough information to enable you to complete your planning recommendation report in response to the application. Please let me know if you require any further clarification.

Yours sincerely

BOFFA MISKELL LTD



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