

Under the Resource Management Act 1991 (**RMA**)

In the matter of an application by **Dunedin City Council** for resource consents for the operation, closure and aftercare of the Green Island Landfill, Dunedin.

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**Statement of evidence of Sue McManaway**

4 March 2025

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**Applicant's solicitors:**

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**anderson  
lloyd.**

## **Qualifications and experience**

- 1 My name is Sue McManaway.
- 2 I am a Principal Landscape Planner at Boffa Miskell Limited (BML), based in Christchurch.
- 3 I am a registered member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA). I hold a Bachelor of Landscape Architecture with Honours from Lincoln University and a Bachelor of Arts Degree in History and Education from the University of Otago. My professional experience involves over 20 years in landscape planning on a wide range of projects including both landscape and visual effects assessments and territorial landscape studies.
- 4 I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the code and am satisfied the matters I address in my evidence are within my expertise. At the time of writing, I am not aware of any material facts that I have omitted that might alter or detract from the opinions I express in my evidence.

## **Scope of evidence**

- 5 I have been asked to prepare evidence in relation to landscape/natural character effects of the proposal.
- 6 This includes:
  - (a) Background and landscape summary;
  - (b) Areas of disagreement; and
  - (c) Further matters including:
    - (i) Conditions of consent; and
    - (ii) Landfill cap grade.

## **Background and landscape summary**

- 7 I prepared the Green Island Landfill Closure: Landscape, Natural Character and Visual Effects Assessment (15 March 2023) for Dunedin City Council and have engaged with the Otago Regional Council's Landscape Architect (Rachael Annan) as part of the peer review process.
- 8 The dominant landscape character of the Site is as a modified working landfill. The Site is not within the coastal environment or part of any

outstanding natural feature or landscape or highly valued amenity landscape.

- 9 However, Abbots Creek, Kaikorai Stream, Kaikorai Estuary and Pukemakamaka/Saddle Hill are key landscape features nearby and while the existing level of natural character within the Site is highly modified, natural character of the adjacent waterways and estuary is higher.
- 10 Effects during the operational stages on these landscape features and other landscape, visual amenity and natural character values will be limited due to the context of the established landfill, the proposed management of stormwater, sediment and leachate, and due to screening by existing perimeter vegetation, particularly from close viewing areas.
- 11 On completion, where it is visible, the final landform will appear as a grassed, open terrace. The established vegetation on the perimeter will be essential to soften, screen and integrate the landform with the character and values of its wider setting. Therefore, a Vegetation Management and Restoration Plan (VMRP) will be prepared as part of the Proposal, setting out the routine monitoring and maintenance necessary to promote the health and longer-term stability of these trees.

#### **Areas of disagreement**

- 12 There are no outstanding areas of disagreement regarding landscape findings.

#### **Further matters**

##### *Conditions of consent*

- 13 In the course of preparing evidence, Otago Regional Council's Landscape Architect recommended minor alterations to the draft proposed conditions of the VMRP. Recommendations largely sought greater certainty of timeframes and balance in ensuring the replacement of established exotic planting does not unnecessarily compromise vegetative screening, scenic value or habitat provision.
- 14 The proposed VMRP conditions have subsequently been revised and agreed (20 February 2025).
- 15 The final evidence provided by Council's Landscape Architect quotes these revised conditions but also states, '*The conditions do not specify if any related planting work will commence prior to the document's completion.*'

- 16 I note that it is the purpose of the proposed VMRP (which must be prepared within six months of the granting of consent) to develop and set out the detailed programme of works. Therefore, no related planting work is proposed to occur prior to the document's completion.
- 17 Council's Landscape Architect also states, 'Further mitigation design analysis may be required to address issues identified through the (VMRP) review.'
- 18 I consider that the objectives and outcomes set out in the draft framework and proposed conditions of the VMRP provide for a process in which any issues identified must be addressed, which could include further mitigation design analysis.

#### *Landfill cap grade*

- 19 An additional matter is raised by Otago Regional Council's Landscape Architect regarding their understanding that the proposal requires a 4% finished slope, and that this will occur without increased overall height.
- 20 Council's Landscape Architect has stated 'While it is anticipated that the increase instead to the breadth of the landfill may not cause additional adverse landscape effects in and of itself, this has not yet been confirmed by the application landscape assessment (or evidence).'
- 21 I am aware of the s42A report recommendation to revise the final cap contours to achieve a minimum cap grade of 4% across the area of landfill that is shown as having a 2% grade, and 5% in all other areas.
- 22 I consider that changes necessary to achieve this final cap grade where there is no increase in height are unlikely to cause additional adverse landscape effects and I note that the existing draft conditions provide for a process where the final landfill cap design must be certified by ORC. This is described further in the evidence of Mr Roberts.

**Sue McManaway**

4 March 2025