Memorandum



To: Shay McDonald, Senior Consents Planner

Organisation: Otago Regional Council

From: Rachael Annan, Technical Director, Landscape Planning

CC: Samantha lles, Principal Environmental Consultant

Date: 24 May 2024 **SLR Project No.** 875.V15838.00001

RE: RM23.462 - Green Island RRPP - Landscape Peer Review/RFI Questions

1.0 INTRODUCTION

SLR Consulting NZ (SLR) has been engaged by Otago Regional Council (ORC) to provide technical peer review of the landscape assessment submitted by Dunedin City Council (the applicant) for the Green Island Resource Recover Park Precinct.

This peer review work has been carried out in stages, with:

- Feedback provided on the pre-lodgement application in November 2023; and,
- S92 request matters raised on the lodged application in April 2024.

It is acknowledged that the lodged application has incorporated a number of landscape issues which were raised in the pre-lodgement peer review and site discussions. Mitigation measures have also been bolstered.

The landscape related S92 response has now been received (BML, May 2024):

- Attachment F_Green_Island_RRPP_Natural Character_RFI_Response
- Attachment G Green_Island_RRPP_s92_Response_Natural_Character_Photos
- Attachment H_ Green_Island_RRPP_s92_Response_Existing site overlay
- Attachment I_ Green_Island_RRPP_s92_Response_Section_5

The scope of this landscape peer review memo (on the lodged application, including the s92 response) is defined by the ORC requested focus on natural character matters.

2.0 RESPONSE

Assessing natural character effects includes consideration of the nature, scale and location of the proposal, and the relationship (proximity, level of intervening landform or vegetation) of the proposed development area to relevant water bodies.

'The RRPP Site is separated from the waterways by existing perimeter bunding and vegetation which will remain and are not proposed to be developed. However, due to the proximity of the operational area and RRPP Site to these river margins, natural character matters are addressed.' (BML Assessment, p.9)

For the RRPP application, natural character effects are considered with regards to the adjacent Kaikorai Stream and its margins. Assessing effects on the stream also involve consideration of the stream's existing level of natural character and sensitivity to the 'landscape change' afforded by the proposal.

As illustrated below, the proposed RRPP extends the built infrastructure and working area of areas 6-9, within the existing designation, towards adjacent the Kaikorai Stream (top of image).

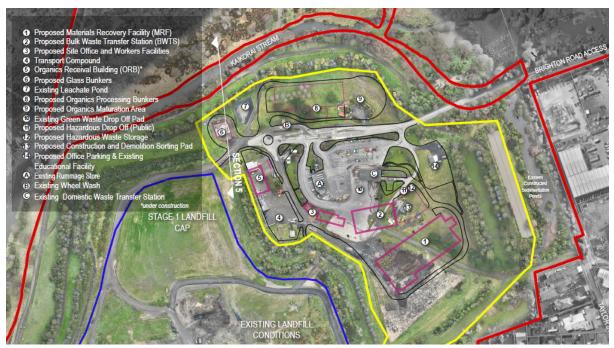


Figure 1: BML Attachment H, s92 Response (Plan inset): Existing Site Overlay.

The level of existing modification to the application site's designation area over time is acknowledged. As is the modification to the adjacent and nearby water-bodies and their margins, being the Kaikorai Stream (and Abbots Creek), wetland and estuary areas.

As a regionally significant wetland, adverse effects on these areas are required to be avoided. Identified (statutory context) natural character values, particularly *scenic quality and habitat provision'* are noted for these water-bodies, despite their existing level of modification.

The existing level of natural character within the RRPP Site and adjacent landfill is highly modified. Natural character of the adjacent waterways and nearby Kaikorai Estuary is higher, particularly in regard to the bird life that the estuary supports and scenic qualities present. Those same scenic qualities are less apparent in the waterways immediately adjacent to the RRPP Site. The well-established perimeter vegetation also contributes somewhat to natural character, primarily in regard to experiential aspects as well as supporting some habitat.

(BML Landscape Assessment, p.42)

Construction/Short term effects

The landscape assessment (at p.24) references BML ecology findings for the application, that the proposal:

"...will not legibly reduce the abiotic or biotic aspects of natural character further on Site or within the wider context, particularly in terms of the adjoining water-bodies.

Reference is made to appropriate dewatering and contamination management (drawing on findings of others).



The assessment also sets out, as the author's own opinion that:

'Effects on experiential aspects of natural character may be temporarily adverse during construction however these will be short term and temporary.' (emphasis added)

While accepted, the basis for this statement though is implicit rather than set out, anticipated to be associated with increased noise, dust and activity during construction (and prior to the establishment of new planting).

The assessment findings regarding construction effects on the experiential aspects of natural character are read as adverse. However, a statement clarifying this point and a qualifying ranking of adverse construction/short term effects are not provided.

The focus on experiential matters is agreed. However, while construction activity is of a shorter time frame, there will be increased ongoing operational use, which may afford an associated shift in experiential aspects of natural character associated with the adjacent Kaikorai Stream. On balance, it is also acknowledged that public access is not provided through this area.

Overall/Long Term Natural Character Effects

The proposed extended area of the RRPP, will involve increased ongoing activity, noise and smells with organics processing near the stream, and increased activities and structures further towards the stream (compared to that at present). The assessment of such matters however is beyond the remit of landscape expertise, and the site zoning and presence of an adjacent industrial area are also acknowledged.

The assessment notes that (emphasis added):

In terms of built form, it is the low profile components of the proposal (the glass and organic bunkers and maturation area and existing leachate pond) that are located at this northern edge of the RRPP Site, closest to the Kaikorai Stream. The proposal will also result in increased hard surfacing and accessways in this area... The area will be busier than it is currently with a greater level of machinery and vehicles present.

Overall, it is considered that the degree of change will be low overall due to the existing level of modification and the low profile and low density of the proposed structures at this northern location. It is proposed that the adjacent layers of perimeter vegetation between the RRPP Site and Kaikorai Stream be maintained with potential for native succession planting as a result of the proposed VRMP...

Kaikorai Stream is located below the RRPP Site so that the angle of view, combined with the perimeter vegetation means views from the Stream margins to the increased activity will be largely screened. An awareness of an increase in activity as a result of the proposal may be possible, however it is noted that public access and opportunities for the public to experience the stream margins is currently limited to areas outside of the Green Island landfill site. Implementation of the proposed VMRP will provide for an increase in native species within the perimeter plantings, resulting in an increase in natural character at the wider scale overall.

On balance, natural character effects are assessed as very low with positive effects over time following implementation of the VMRP.

(p. 24-25)



The following cross-section from the proposed development area down to the stream helps illustrate the relationship between these two areas.

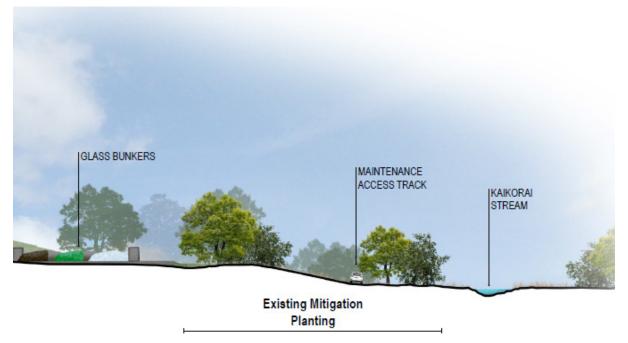


Figure 2: BML Attachment I, s92 Response (Cross-Section inset)

Intervening vegetation on the embankment is acknowledged to provide screening.

Concluding findings equating to less than minor adverse natural character effects are accepted.

A positive natural character outcome is agreed to rely on the effective implementation of the proposed VMRP. A condition is recommended that:

- The finalised document is submitted for review; and,
- From initial planting implementation through to canopy enclosure that regular checks confirm the level of planting establishment, any required vegetation replacement, and weed eradication.



Regards,

SLR New Zealand

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