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Memorandum

To Aileen Craw

WSP Ltd

From Mike Moore

Date 21 September 2023

Subject Proposed Mt Cooee Landfill Expansion, Consent No:

RM12.668, Otago Regional Council further information

request

This memorandum is in response to the request for further information by Otago Regional Council, dated 27 July 2023. Below, I copy the information requests relevant to the landscape effects of the proposed afforestation and provide comment.

54. Please clarify whether there are any provisions in the Regional Policy Statement (Operative and Proposed), Water Plan or Waste Plan or other ORC plans and policy relevant to this landscape assessment and consider effects in this context.

Comment

I have sought the expert advice from WSP planners as to whether there are provisions relevant to the landscape effects of the activity in the documents listed. This has confirmed that there are no relevant provisions in the Partially Operative Otago Regional Policy Statement 2019, the Proposed Otago Regional Policy Statement 2021, the Otago Regional Plan: Waste 2022.

With regard to the Clutha District Plan (CDP), my report references relevant provisions when addressing landscape values on page 7. Given that the Mt Cooee landfill is designated, assessment against CDP provisions (e.g. relating to the Rural Resource Area) is not required.

55. Please refer to findings from the Terrestrial Wetland and Waterway Assessment to support/expand slightly on the identification of natural character value.

Comment

In terms of natural character, my assessment has found that:

'The portion of the site that remains under pastoral land use contributes to rural character and contains a natural wetland which whilst modified, retains some natural character value'.

In assessing the effects of the proposed development against Section 6a of the RMA, my assessment stated:

'The wetland is not identified as a regionally significant wetland by ORC¹ and as confirmed in the Terrestrial Wetland and Waterway Assessment², is degraded.'

I consider that the Terrestrial Wetland and Waterway Assessment (TWWA) supports these statements and quote excerpts as follows:

'The ecological values of the identified natural wetland are likely to be low as parts are dominated by exotic species, fauna values appear low, and it is very small and therefore unlikely to be able to provide sufficient buffering of the waterway from the current land use (as evidenced by the heavy sediment load in the waterway and stock access to the wetland)'.

'A natural wetland, albeit of low ecological value, is located at the foot of the slope below the proposed landfill expansion area...'

¹ www.orc.govt.nz/managing-our-environment/water/wetlands-and-estuaries/clutha-district

² 4sight Consulting, 2023, Mt Cooee Landfill Expansion Area: Terrestrial Wetland and Waterway Assessment.

Discussing the small stream in the southern part of the site the TWWA states:

'The stream is already compromised by stock access and has poor water quality as indicated by the low MCI score for the site.'

56. Please clarify the field of view shown in each image which conform to standard image reading distances to assist with an accurate understanding of the appearance/visibility of the Site from as seen from their respective viewpoints.

Comment

The photographs in the graphic supplement to my report (Figures 2 - 10) are provided to support and generally illustrate my written descriptions. They do not include simulations of visual effects and are not intended to be relied on in place of a site / viewpoints visit. Never-the-less and as requested, the approximate fields of view for each stitched photograph are as noted in the table below:

Figure	Horizontal field of view (degrees)
2	173 (wide-angle)
3	93
4	68
5	67
6	75
7	63
8	94
9	97
10	102

57. Please confirm/clarify the difference between the existing natural landform and proposed additional height including identifying if/where it varies.

Comment

As shown in Figure 12c in my report, the proposed landfill will result in an eventual increase in the height of the current landform within its footprint area, and the increase will vary across the area with specific location.

There has not been surveyed height information to a high degree of detail available for this area, however, in consultation with WSP staff³, I understand that the maximum current height within the proposed landfill footprint is approximately 28.5m. The final height of the landfill will be 36m, making the overall height increase from the current high point 7.5m. This is consistent with the height relationship shown in Section 01 in Figure 12c of my report.

58. Three key mitigation and remediation measures are described: limits to expansion, final rehabilitation, and screen plantings. The progressive landform screening approach appears to limit the location of the active working face. Please update the landscape assessment to refer to any limits to the size of the active working face, if they are proposed, or use of daily cover to help reduce potential visual effects.

Comment

Daily cover of the fill face with soil is an important operational measure to mitigate adverse effects of the landfill activity, including visual. I understand that this is consistent with best landfill management practice, is already done, and will continue to be done.

A maximum area for the active working face would potentially be an effective additional measure to further ensure visual effects are well mitigated. I would support a maximum area condition for the working face if this is acceptable to the applicant. The applicant would need to advise what a workable area would be.

³ Pers Comm – R Latham, Principal Waste Consultant, WSP

59. Please provide an indicative or maximum height of the resource recovery centre building so that the extent to which planting on the Kaitangata Highway frontage will screen and visually soften the views of the resource recovery centre can be assessed.

Comment

Building heights for the resource recovery centre have not yet been defined. My advice from WSP however, is that an indicative height of 4m for the podium and re-use shop / education centre would be reasonable.

60. Please clarify whether the final form of the landfill will integrate in this setting with minimal / neutral effects or whether long term effects will be adverse / moderate-low (or low/minor and less than minor as stated in the AEE pp 62 and 66) or, if both assessment findings apply, explain how they are different i.e. Does the statutory provisions assessment reflect a comparison between what is proposed and what exists?

Comment

On page 22 of my report, in discussing the landscape effects in relation to Section 7 (c) and (f) of the RMA, I have commented that the final landform associated with the expanded landfill will integrate well in this setting, and rated landform effects as adverse / minimal - neutral. I acknowledge that giving a rating to the effects on landform is unhelpfully focused on one aspect and creates potential confusion. It would be best if this rating was disregarded.

The assessment of relevance is given on page 20 of my report and addresses the effects on landscape values of the proposed expanded Mt Cooee Landfill generally. This is that long term effects (once rehabilitated), will be adverse / moderate-low (minor).



Mike Moore

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