

Grey District Council
C/O: Mark Geddes
Perspective Consulting Ltd

11th July 2023

Re: LU3154/2023 Request – Landscape Matters

Dear Mark,

I have received your requests for further information pertaining to the above consent application for the Barrytown Mineral Sands Mining Project. This letter provides a response to the landscape matters by addressing points 14-22 of the original request and answering the further questions received on the 29th of May.

In addition, I have also had discussions with Rhys Girvan (Landscape Architect) at Boffa Miskell. It is my understanding that Rhys has provided input to this further information request as a landscape and visual peer reviewer.

Landscape matters include:

14. Please confirm the maximum height of the Ore Stockpile Area and assess any potential increase in effects where above the adjoining 4.5m stockpile bund.

Response: The maximum height of the ore stockpile area will be 4.5 metres. It will be no higher than the adjacent stockpile bund (central bund).

15. Please clarify the extent to which relevant landscape attributes have been assessed. This should explain and consider how relevant factors across all physical, perceptual, and associative landscape attributes have contributed to an understanding of the overall landscape character and its values. It should also highlight any reliance on third parties, omissions, and gaps.

Response: My *Landscape and Visual Assessment* has been prepared in accordance with *Te Tangi a te Manu, NZILA Landscape Guidelines*. Section 3.0 (pg. 4) of my assessment outlines the methodology used, Appendix 1 (pg. 72) outlines the assessment criteria adopted, and Appendix 3 (pg. 80) outlines the third-party documents relied upon in my assessment. As is standard practice, my conclusions have been drawn from research, site visits, liaising with other disciplines, the mining methodology, staging, design and rehabilitation details, and the statutory framework.

The landscape character of the site is outlined under Section 4.0: Existing Landscape Context (pg. 6). This chapter describes and interprets *“the character and the values of the Project area – physical, associative, and perceptual. Analysing these attributes is pertinent to understanding the potential effects of the Project on these values”* (pg. 6). *Te Tangi a te Manu, NZILA Landscape Guidelines* advises against compartmentalising landscape values into single dimensions. As such, my assessment discusses the physical, perceptual, and associative values in a contiguous, blended manner throughout. For example:

- Physical values (both natural and human features) are described under the headings of ‘Landform’ ‘Landcover’ and ‘Landuse’ under Section 4.2: Intermediate Context.
- Associative values (particularly the cultural narratives of the area) are discussed in the 2nd and 3rd paragraphs of Section 4.2: Intermediate Context.

- Perceptual values (such as the need to maintain visual amenity, long views and natural character) are included under Section 8.0: Identified Issues.

The findings are then discussed in the context of the proposal in the following sections of the report.

16. Please provide a clear delineation of the inland extent of the coastal environment as understood for the purpose of the Assessment.

Response: The entire area in and around the site has conservatively been considered part of the coastal environment. This follows the guidance provided in Section 9.18 (pg. 211) of *Te Tangi a te Manu, NZILA Landscape Guidelines*, which discusses how to define the relevant area. As per Section 4.2 (pg. 7) of the assessment, the area is well defined on four sides. It includes *“the 17-kilometre stretch of coastline between Razorback Point in the north to Seventeen Mile Bluff in the south, and the skyline above the Paparoa Ranges in the east (to the ridgeline) to the Pakiroa Beach coastline in the west. Here, the thin stretch of coastal plain reaches just 1.5 kilometres wide between the coast and the ranges.”*

Section 7.2 (pg. 28) of the assessment covers the *New Zealand Coastal Policy Statement (NZCPS)* and discusses ‘*Determining the Extent of the Coastal Environment*’. It references both the description above and the *Proposed Te Tai o Poutini Plan (TTPP)*. In addition, Plan 6.0 (pg. 8) of the Graphic Supplement visually illustrates the extent of the coastal environment.

17. Please define how natural character has been interpreted and provide an assessment of the existing and consequent natural character which will result from the proposal, including opportunities for restoration.

Response: Natural character has been interpreted as ‘the naturalness or degree of modification of an area’ and/or ‘an area’s distinct combination of natural characteristics and qualities’ (*Te Tangi a te Manu, NZILA Landscape Guidelines*, Section 9.02, pg. 205).

As part of responding to this RFI, further assessment of the existing and consequential natural character as a result of the Project has been completed (refer to Section 7.2, pg. 28). Within this section, the natural character is defined, relevant area is identified, natural characteristics and qualities are assessed, and recommendations are made.

For completeness, this work is completed in accordance with the *New Zealand Coastal Policy Statement*, with a particular focus on Objective 2, Policy 13 (the preservation of natural character) and Policy 14 (the restoration of natural character). Opportunities for restoration are discussed under the Recommendations section of my report (pg. 65).

18. Please further explain the rationale as to how the relevant landscape attributes have been assessed and support the finding that landscape character effects will be minor during the proposed activity and following rehabilitation.

Response: Please refer to sections 9 and 10 of my Landscape and Visual Assessment. Appendix 1 (pg. 72) of the assessment provides the Landscape and Visual Assessment Criteria.

Having now had the opportunity to further assess the Project site from 3195 Coast Road (G and G Langridge) and hear the neighbour concerns, I consider it will further reduce the visual effect on this particular property if the access road is moved further away from the north-eastern corner of the site. Additionally, it is my recommendation that the existing vegetation in the north-eastern area is retained. With these changes now incorporated into the Project,

I can confirm that my original findings that the landscape and visual effects will be minor remain unchanged. (For further information, refer to my comment under 21).

19. Please provide cross references to photographs and cross section numbering used in the Graphic Supplement within the Assessment.

Response: The revised *Landscape and Visual Assessment* (appended to this letter) contains specific references to page numbers within the Graphic Supplement.

20. For each photograph provided in the Graphic Supplement, please clarify the compilation of panorama photographs and field of view which conform to standard reading distances.

Response: The *Landscape and Visual Assessment* has been prepared in accordance with *Te Tangi a te Manu, NZILA Landscape Guidelines*. This document identifies the *NZILA Best Practice Guide 10.2, Visual Simulations, 2010* as the current standard for which to prepare visual simulations. Although at this stage, visualisations have not been issued for the Project, I have followed a similar methodology when compiling the panoramas.

Photographs are taken with a Canon 600D camera with the lens set at 50mm. Photographs have then been stitched together utilising the 'Photomerge' function in *Adobe Photoshop*. The resulting panorama has then been placed into a fixed size frame in *Adobe InDesign*. Individual compilation of images can vary per panorama, but once placed into the standard frame, the image matches the NZILA best practice horizontal and vertical field of view. All panoramas have a caption below them which lists the date the image was taken, the type of camera and lens used, and whether it is a public or private viewpoint. This states that A1 sized prints should be viewed at approximately 500mm distance from eye level and A3 sized prints should be viewed at approximately 250mm distance from eye level.

21. Please supplement the supplied assessment with an assessment of residential visual amenity from within affected persons properties (where given permission to access from the landowner). This should include the preparation of suitable graphic and or visual material which support identified visual effects. An assessment of visual effects should also be undertaken from properties where written approval is being sought but has not yet been provided (3261 SH6, LOT 2 DP 412689 and RS 6674).

Response: Whilst preparing my initial Landscape and Visual Assessment it was not possible to view the site from the neighbouring properties. As such, observations, and conclusions in relation to potential effects were made from property boundaries and/or driveway entrances. In addition, Chris Glasson (Landscape Architect, Glasson Huxtable) supplied visualisations previously prepared for these properties as part of a former consent application. Looking at Chris' visualisations provided useful insight, although it is acknowledged that this method is not the same as a physical visit.

As part of responding to this request for further information, I revisited the site on the 24th of May 2023. Initially I was advised I did not have permission to visit the three neighbouring Langridge properties, so Rhys Girvan and other Council experts went ahead without me. Later in the afternoon, I was granted permission to visit the private properties as the only applicant expert, accompanied by Sharon and Robyn Langridge. Over the next 45 minutes, I visited all three Langridge properties and obtained useful photos (refer to the updated Graphic Supplement).

As mentioned previously, as a result of viewing the Project site from 3195 Coast Road (G and G Langridge), the access road for the Project has now been moved on my recommendation further away the north-eastern corner of this property and the existing vegetation also in this north-eastern corner will be retained.

Written approval for the Project is currently being sought from the residents of 3261 SH6, LOT 2 DP 412689 (O'Neil and Costello) and RS 6674 (Cowan). If for any reason, written approval is not granted, I can supply a landscape and visual assessment that includes these properties also.

22. If landowner permission cannot be obtained in relation to item 21, Council may be able to obtain landowner permission to make that assessment. In that case, please agree to the commissioning of a report in relation to those matters under section 92(2) of the RMA.

Response: I believe the above request is now unnecessary.

Further questions of clarification were also received from Rhys Girvan (via Mark Geddes) on the 29th of May. These have been responded to below:

1. Clarify the discrepancies in dimensions of riparian planting and fencing indicated along Collins Creek (3 metres indicated in 17.0 Landscape Mitigation Plan vs. 7 metres indicated in 13.0 Landscape Mitigation Section: Collins Creek within the Graphic Supplement) including an understanding of how planting is proposed in response to existing slumping evident along the profile of existing stream margins.

Response: Riparian planting along Collins Creek will be a minimum of 3 metres wide and follow the curves of the channel. Section 2 on Page 39 of the Graphic Supplement illustrates that at this particular location, the curve of the stream channel is heading away (south) from the new fence. As a result, the width of planting in this location is greater. Of note, the 3.0 metre offset relates to legislation for fencing waterways Regarding the existing slumping on the margins of the stream, plant species have been selected for their behaviour in harsh, riparian conditions and are considered suitable species to assist with bank stabilisation. Planting will be undertaken in accordance with the landscape detailed design and sediment control plan. Bio-coir matting will assist to stabilise the bank.

2. Confirm the area of wetland augmentation anticipated as a consequence of mitigation planting as identified to enhance the wetland habitat of Canoe Creek Lagoon. During the site visit, the applicant's landscape architect, Ms Crawford, suggested planting may be brought back from the margins of the lagoon and coastal edge in response to existing habitats and instead may follow existing fence lines within the Site.

Response: Attachment M1 of the AEE contains the Wetland and Riparian Plan prepared by the ecologist. A key objective of this is to limit any adverse effects on the existing wetland environment. This includes the way in which new planting is undertaken. The specifics of where planting will occur will depend on on-site conditions at the time of planting and expertise provided by the project ecologist, but the proposed conditions of consent require a minimum of 6.0m of planting surrounding the Canoe Creek Lagoon, as shown in section 25.0 of the Graphic Supplement.

3. Clarify the extent of vegetation clearance which is required and has been assessed to facilitate access from SH6 as identified in Footnote 66 on page 57.

Response: Since the site visit in May 2023, the Project team has agreed to relocate the access road further north to address neighbour concerns. This will avoid the removal of vegetation on the corner of 3195 Coast Road and SH6.

4. During the site visit, I observed that the areas of planted flax and isolated kahikatea within the Site appear to be located outside the mine sequence area and east of the central stockpile. In

visiting the adjoining properties to the north of the Site it was also evident that the established flax planting provides some beneficial low-level screening from these properties when viewed from beyond the site. Based on this, I am unclear the extent and timing of determining when this vegetation may be retained or removed and request this be clarified in relation to the timing of proposed mining activity.

Response: I can confirm that the established flax near the standoff pad is located outside of the mining area. Initially it was proposed that this flax could be transplanted to be used for mitigation planting elsewhere. Since visiting the Langridge properties north of the site (at 3323 Coast Road) it has become apparent that it would be more beneficial if the flax were retained for low-level screening. The idea is to retain this planting until the new planting on the north-eastern corner of the site (on the boundary with 3323 Coast Road) is established and able to provide its own adequate screening. At the end of the Project, the flax will need to be removed to allow for recontouring of the site to occur.

In terms of the small number of isolated kahikateas, I reconfirm my original findings that these are low value and not worth retaining (one is dead already).

I trust the above answers provide clarity.

Kind Regards,



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