

Memorandum

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Attention: Shay McDonald, Otago Regional Council and Rachael Annan, 4Sight/SLR

Date: 10 May 2024

From: Sue McManaway (BML)

CC: Rachael Eaton (BML) Chris Henderson (DCC), Michael Garbett (AL), Nick Eldred (GHD)

Topic: Green Island Resource Recovery Park – Request for further information:
Natural Character matters

The purpose of this memo is to provide responses to the additional information requested by Otago Regional Council, in relation to Green Island Resource Recovery Park consent application RM24.143; specifically natural character matters raised by technical review.

Question 1: Please include ‘scenic quality’ and ‘habitat provision’ (regarding natural character values) among quoted policy context matters (Section 3 Relevant Statutory Provisions) and provide direct comments in response to these.

As identified in Section 3 of the Assessment, the following statutory documents are relevant to the assessment of this proposal:

- National Policy Statement for Freshwater
- National Policy Statement for Indigenous Biodiversity
- National Environmental Standards – NES Soil and NES Freshwater
- Partially Operative Otago Regional Policy Statement (‘Otago RPS’)
- Proposed Otago Regional Policy Statement (‘Proposed RPS’)
- ORC Regional Plans including relevant plan changes
- The Kāi Tahu ki Otago Natural Resources Management Plan 2005 (NRMP)
- Dunedin City District Plan (2GP)

To expand on this, key provisions relating to natural character which are relevant to the terms ‘**scenic quality**’ and ‘**habitat provision**’ are set out under the relevant documents below and a direct comment provided in response:

Otago RPS 2019 (fully operative as of Monday 4 March 2024)

PORPS objective 3.1, policy 3.1.1 requires freshwater to be managed to “maintain or enhance as far as practicable”, amenity and landscape values of rivers and wetlands among other matters.

Comment 1: As set out in section 5.1 Natural Character Effects (pp. 23-25), the proposed modification at the site is in the context of existing 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 birdlife that the estuary supports and scenic qualities present.

Amenity and landscape values of the adjacent freshwater waterbodies will be maintained due to the existing level of modification and the low profile and low density of the closest proposed structures combined with the screening provided by the angle of view from the adjacent riparian margins and perimeter vegetation.

The site will be busier with heavy machinery and vehicles than it is currently and increasing hard surfacing. An awareness of this 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 Vegetation Restoration and Management Plan (VRMP) as a part of the proposal will provide for an increase in native species within the perimeter plantings, resulting in an increase in natural character at the wider scale overall.

PORPS objective 3.1, policy 3.1.1 requires “maintenance” of good water quality, and “enhancement” where it is degraded, including for: important recreation values.

Comment 2: Water quality is a key attribute of the abiotic systems that make up natural character. It is understood from the Boffa Miskell Ecology Report that operational stormwater from the RRPP will be intercepted prior to being discharged which is anticipated to buffer and attenuate any increase in flows and manage sediment and leachate and that there are not expected to be any additional, detectable effects on Kaikorai Stream as a result of dewatering activities, thereby maintaining that aspect of natural character.

PORPS objective 3.1, and policy 3.1.9 requires ecosystem and indigenous biodiversity be managed to “maintain or enhance” ecosystem health and indigenous biological diversity; and “maintain or enhance as far as practicable” areas of predominately indigenous vegetation.

Comment 3: Indigenous vegetation and biodiversity are key attributes of the biotic systems that make up natural character. The RRPP site has already been cleared of original vegetation, and any vegetation that may be cleared is generally comprised largely of exotic species. It is understood from the Boffa Miskell Ecology Report that no vegetation clearance within the existing landfill footprint is of ecological concern, thereby maintaining those aspects of natural character.

Regional Plan: Water for Otago

Maintain or enhance the amenity values associated with Otago’s lakes and rivers and their margins. (Policy 5.3.4)

Comment 4: Refer to Comment 1 supplied above.

In the management of any activity involving surface water, groundwater or the bed or margin of any lake or river, to give priority to avoiding, in preference to remedying or mitigating adverse effects on the natural character of any lake or river, or its margins; and amenity values supported by any water body. (Policy 5.4.2)

*Comment 5: As set out at p. 23 of the Assessment, the RRPP Area is separated from the margins of the nearest waterways and as shown in **Section 4, Figure 6A**, located so that the angle of view, combined with the perimeter vegetation means views from the Kaikorai Stream margins to the increased activity will be largely screened. It is understood from the Boffa Miskell Ecology Report that operational stormwater from the RRPP will be intercepted prior to being discharged which is anticipated to buffer and attenuate any increase in flows and manage sediment and leachate and that there are not expected to be any additional, detectable effects on Kaikorai Stream because of dewatering activities.*

Have particular regard to the following features of lakes and rivers, and their margins, when considering adverse effects on their natural character:

- **The topography, including the setting and bed form of the lake or river;**
- **The natural flow characteristics of the river;**
- **The natural water level of the lake and its fluctuation;**
- **The natural water colour and clarity in the lake or river;**
- **The extent of use or development within the catchment, including the extent to which that use, and development has influenced matters (a) to (e) above. (Policy 5.4.8)**

Comment 6: Refer to previous comments, particularly Comment 5 supplied above.

To have particular regard to the following qualities or characteristics of lakes and rivers, and their margins, when considering adverse effects on amenity values:

- **Aesthetic values associated with the lake or river; and**
- **Recreational opportunities provided by the lake or river, or its margins. (Policy 5.4.9)**

Comment 7: The 2015 Natural Character Assessment of Otago's coastal environment referenced in the Assessment rated the Kaikorai Estuary as medium-low overall, with the following comment:

While providing important habitat for wildlife this unit has been significantly modified by human habitation and lacks perceptual naturalness of wild and scenic value.

Under the 'experiential' criteria the following comment was made:

Domestication is high. Little wildness of either type. Some scenic value, particularly along the western margin.

Aesthetic and recreational values are not identified among the ORC's recorded values of the lagoon. Nevertheless, the Kaikorai Estuary is a key landscape feature which retains aesthetic values and legibility; however, these values largely relate to the presence of water, natural tidal, estuarine, and formative processes which are associated more with the 'western margin' and less apparent at the tributaries adjacent to the RRPP site where exotic vegetation dominates the margins.

The existing well established perimeter vegetation contributes somewhat to natural character, primarily in regard to experiential aspects as well as supporting some habitat. These factors will be maintained due to the existing level of modification and the low profile and low density of the closest proposed structures combined with the screening provided by the angle of view from the adjacent riparian margins and perimeter vegetation.

As set out at p. 25 of the Assessment, 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.

Retain flows in rivers sufficient to maintain their life-supporting capacity for aquatic ecosystems, and their natural character. (Policy 6.3.1)

Comment 8: Refer to Comment 5 supplied above.

Promote the creation, retention, and enhancement of appropriate riparian vegetation. (Policy 8.7.1)

Comment 9: 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.

Water Plan objectives 10.3.1, 10.3.2, and policies 10.4.1, 10.4.1A, and 10.4.2, require adverse effects are to be "avoided" on any regionally significant wetland, but remediation or mitigation of effects is allowed where the activity relates to nationally or regionally significant infrastructure.

Comment 10: The wider landfill operational area which the proposed RRPP Site is within, is adjacent to Kaikorai Stream and its confluence with Abbotts Creek. In the ORC planning maps, the regionally significant Kaikorai Estuary wetland identified in the Water Plan, includes the section of Kaikorai Stream and Abbotts Creek adjacent to the RRPP Site.

*The RRPP Site is separated from the waterways and their margins by existing perimeter bunding and vegetation which will remain and are not proposed to be developed but to be maintained with potential for native succession planting under the proposed Vegetation and Restoration Management Plan (VRMP). Natural character effects are found in the Assessment to be **very low** with **positive** effects over time following implementation of the VMRP.*

Question 2: Please clarify statements at p. 42: ‘Natural character of the adjacent waterways and nearby Kaikorai Estuary is higher, particularly in regard to the birdlife that the estuary supports and scenic qualities present. Those same scenic qualities are less apparent in the waterways immediately adjacent to the RRPP Site’. While this appears to relate to relevant policy matters, findings are somewhat immediately arrived at (without direct reference to context analysis, and either context photographs or other studies) and it is unclear if these are the author’s own findings or if these findings draw on other expertise, such as ecology, or wider landscape studies.

Comment 11: I note that the quoted sentence above comes from the report’s Conclusion at p. 42. The statements in the conclusion are summarised from the Natural Character Effects section (5.1) where the main analysis sits.

The use of ‘higher’ refers to the preceding sentence which describes the existing level of natural character within the RRPP Site and adjacent landfill as highly modified due to the long history of reclamation, drainage and waste disposal. **By comparison**, ‘the natural character of the adjacent waterways and nearby Kaikorai Estuary is **higher**, particularly in regard to the birdlife that the estuary supports and scenic qualities present’.

The analysis of this is based on Section 4.0 of the Assessment which describes the existing environment and as part of that, at section 4.3 (p. 18), the existing natural character of waterbodies. The analysis and effects assessment findings draw on the Author’s observations as well as other expertise (primarily ecology) and wider landscape studies, in order to come to conclusions.

For example, the Assessment describes the estuary and stream’s margins as modified by roads, causeways, drainage channels and buildings as well as reclamation with much of the former indigenous vegetation replaced by weedy exotic species.

As part of this description, the Assessment notes that Kaikorai Stream and Abbots Creek (which are the waterways closest to the RRPP site) are identified as having moderate ecological value in the Boffa Miskell Ecological Effects Assessment while the Kaikorai Lagoon is considered to have high ecological value. Ecological values are taken into consideration as key attributes of natural character.

Regarding the lagoon/estuary, the EclA states at p. 17, ‘Ecological context is high, as the lagoon provides critical habitat for the life cycle of indigenous bird species, which are dependent on wetlands.’ By comparison, the EclA notes at p. 16 that the Kaikorai Stream has modified habitat and water quality conditions, the banks are modified and artificial in certain sections, and the riparian area is highly modified.

The Assessment also refers to the 2015 Natural Character Assessment regarding natural character descriptions and analysis. As set out in Comment 7 above, the Kaikorai Estuary is a key landscape feature which retains scenic qualities associated with aesthetic values and legibility, however these values largely relate to the presence of water, natural tidal, estuarine and formative processes which are associated more with the ‘western margin’ (as described in the 2015 Assessment) and less apparent at the tributaries adjacent to the RRPP site where exotic vegetation dominates the margins.

The relationship of the Site to the adjacent waterways and surrounding exotic riparian vegetation can be seen in the Graphic Supplement, Site Context Photos K and M, Visual Simulation Photo 4 from Walton Park Ave (Existing view from Walton Park Ave) and Photo 6 (Existing view from Thomson Street), Cross Sections 1 and 4 and the additional Cross Section (Attachment I) and site appraisal photograph (Attachment G) provided as part of this request for additional information