

To:	James Danby – iPlan – C/O Western Bay of Plenty District Council (WBoPDC)	Date:	Friday, November 21, 2025
From:	Simon Button, Isthmus Group Ltd (IGL)	Job No:	4959
Subject: Landscape Peer Review – Takitimu Northern Link Stage 2. FTAA-2507-1085			

Introduction and Overview

1. This report provides a peer review of the landscape assessment of the Fast Track Application (FTAA-2507-1085) by New Zealand Transport Agency Waka Kotahi (NZTA) for the Takitimu Northern Link (Stage 2) Designation Alteration (**'the Project'**).
2. The purpose is to review the application in relation to landscape matters and effects. In preparing this review I have read the following documents:
 - *Landscape Visual Impact Assessment ('the Assessment')* – Adrian Morton Landscape Architects Ltd (29 July 2025)
 - Associated maps and plans appended to the Assessment (prepared by Adrian Morton Landscape Architects Ltd and Bespoke Landscape Architects, including:
 - Appendix B - Existing and Proposed Designation
 - Appendix C - Site Photographs
 - Appendix D - Zone of Theoretical Visibility (**'ZTV'**) Maps
 - Appendix E - Concept Landscape Mitigation Plans
 - Appendix F - Bridge Structures
 - Ecological Effects Assessment – Boffa Miskell (31 July 2025)
 - Assessment of Archaeological Values – W Gumbley Ltd (July 2025)
 - Cultural Impact Assessment – Ngāti Taka (May 2023, March 2025 Addendum)
 - Cultural Impact Assessment – Pirirākau Hapu (July 2025 – Confidential and Redacted)
3. I have provided comments on the draft condition set. Where there are any outstanding comments on the conditions, these are also outlined at the end of this review.

Background and Experience

4. My full name is Simon Leigh Button. I hold a BA qualification in landscape architecture with town and regional planning and a Masters' qualification in landscape architecture from the University of Sheffield (United Kingdom). I am a Registered member of the New Zealand

Institute of Landscape Architects NZILA Tuia Pito Ora and an elected member and vice chair of the Board.

5. I am an Associate Landscape Architect at IGL with 12 years' experience. I have worked at IGL since March 2019 and prior to this I was a landscape architect in the United Kingdom.
6. Throughout my career I have worked with both private and public sector clients on a wide range of projects in both rural and urban landscapes across the United Kingdom and New Zealand. I regularly undertake landscape, visual and natural character assessments for projects of varying scales in the infrastructure, renewable energy, residential, educational, industrial, aquaculture, and recreational sectors.
7. Of particular relevance to this project, I have been involved in the Supporting Growth Alliance Pukekohe Transport Network, the SH1 Loop Road safety improvements upgrade and I am currently involved in the North-Western Rapid Transit alignment in Auckland. I have also worked on several motorway upgrades in the UK and have experience working on other linear infrastructure projects for both electricity transmission and walking and cycling tracks across Aotearoa.
8. I undertook an initial review and gap analysis of the landscape components of the Takitimu Northern Link (Stage 2) on behalf of the Western Bay of Plenty District Council (WBoPDC) in December 2023, which included a site visit and site walkover with Adrian Morton in November 2023. I have since re-visited the site in November 2025.
9. Whilst not before the Environment Court, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

Review of the Assessment

10. The Assessment is supported by a **methodology** at chapter 3.3 and Appendix A-1. Whilst the Assessment methodology is broadly consistent with current best practice guidelines (Te Tangi a Te Manu)¹, in my opinion, there are departures and inconsistencies with the guidelines, outlined below:
 - Use of **Landscape Sensitivity and Capacity (including Visual Absorption Capacity)**. Landscape Sensitivity and Capacity analysis can be a useful tool to assess potential effects where the proposal is not yet known – however, they are widely used generic parameters for landscape assessment which become redundant once actual effects of a specific proposal can be assessed directly.² The Assessment

¹ Te Tangi a Te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

² Refer 5.49 Te Tangi a Te Manu

Isthmus.

appropriately combines sensitivity and capacity analysis with a specific values-based assessment for landscape character and visual amenity.

- The Assessment is not supported by a methodology for the assessment of potential effects on **natural character**.
- Whilst the Assessment does use and reference a **7-point scale for effects**; the comparison between magnitudes of effect and the RMA terminology of 'less than minor', 'minor' and 'more than minor' is inconsistent with the guidelines. A comparison of magnitude of effects and RMA terminology is provided below for completeness.
- The Assessment makes multiple references to effects resulting from '**Change**'. To clarify, and as also outlined within Appendix A-1 of the Assessment, change in itself is not an effect - landscapes change constantly. It is the implications of change for a landscape's values that is the effect.

11. Where departures or omissions from the Guidelines have occurred through the Assessment, I have referred back to Te Tangi a Te Manu to complete this review.

						SIGNIFICANT	
LESS THAN MINOR		MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH	

Comparison of magnitude of effect and RMA terminology

12. The Zone of Theoretical Visibility (ZTV) maps within Appendix D to the Assessment is supported by a **methodology** at Chapter 3.3 of the Assessment. Whilst I broadly agree that the site has a limited visual catchment, I have reservations over the accuracy and reliability of the ZTV which is based on LiDAR information and manipulated following site evaluation. The ZTV is based on an aerial map, making it difficult to read, and appears to illustrate that the designation will not be visible beyond a maximum of 300m from the alignment (and more generally, not visible beyond circa 100m from the alignment). The ZTV does not appear to indicate visibility for residential properties which are located on elevated ground overlooking the Project (and are assessed as having Moderate visual amenity effects within the Assessment) and does not appear to consider components of the Project such as the borrow pit.
13. The **Executive Summary** states that as the proposal is for an alteration to an existing designation (D203³), the landscape and visual effects arising from the project are considered 'over and above' the effects permitted by the existing designation. It is

3 As discussed during the site visit, it is understood that Council is in the process of amalgamating designations D181 and D203. It would be beneficial if this point could be clarified within the Assessment, as the Assessment makes one reference to Designation D203 and three references to Designation D181.

understood that Designation D203 authorises the comprehensive construction of a four-lane highway and associated local road upgrades; however the Project is not able to be constructed within the Existing Designation footprint and, as such involves the alteration to the footprint of the Existing Designation D203 and the conditions that apply to part of that designation.

14. The Executive Summary provides an overview of potential effects. These are addressed within the relevant paragraphs of this Review.
15. The **Project Outline** at Chapter 3.1 is succinct and serves as a good introduction to the proposal.
16. The **Project Information** (project description) at Section 4 is clear and detailed. I broadly agree with the list of key components which have the potential to affect landscape character and visual amenity at 4.2.3 of the Assessment; however in my opinion, this list is not comprehensive and should also include extractive activities (associated with the borrow pit) and works within / modifications of wetlands and waterways (including infilling, diversions and realignments etc).
17. I note that the Assessment anticipates a six-year construction period, and that (within the draft conditions) mitigation planting is to be staged and completed during the planting season following the completion of each stage of construction works. I support this approach, and whilst specifications for density of planting, or a total hectareage (coverage) of planting has not been confirmed by the applicant, by my calculation an area of approximately 77ha is illustrated as 'Enhancement Planting', which assuming a 1m – 1.2m density for plant spacing, would result in approximately 770,000 – 640,000 plants required to achieve the Enhancement Planting illustrated in Appendix E (excluding proposed wetlands and stream edge planting). In my opinion, this extent of planting is achievable over a six year 'staged' period so long as nursery stock is secured in advance.
18. The **Existing Landscape and Visual Character** is described at Section 5 of the Assessment. This includes a high-level review of the previous Landscape Assessment (prepared by LA4 for the 2003 designation) at Section 5.1, which is useful to understand the context and consenting background of the site.
19. The Assessment provides a written update to the LA4 landscape units and existing environment to better reflect the current existing environment and to be consistent with Te Tangi a Te Manu. I agree with the description of the existing environment and description of the four landscape character areas at 5.4 of the Assessment. In addition to the description of the existing environment, I note that the project alignment is predominantly across the Rural Zone, however, is also within the Lifestyle Zone to the south-east, and the Industrial Zone and Medium Density Residential Zone to the north-west.

Assessment of Effects

Landscape Character

20. A summary assessment against the identified landscape values is included at section 6.2 of the Assessment, with an assessment against the identified 'landscape areas' provided at sections 6.2.1 – 6.2.4 of the Assessment; including a comparison against the consented designation LA4 assessment at 6.2.5. Whilst the Assessment identifies key landscape values, it would be beneficial to consider these within the context of physical, associative and perceptual aspects, consistent with the methodology.
21. I agree with the detailed descriptions and assessments of the four landscape character areas. I agree that the landscape context of the corridor is already highly modified, and that the project will result in a substantial and new feature which traverses this landscape.
22. Whilst I acknowledge that engagement with **Ngāti Taka** has been undertaken, in my opinion, there is limited assessment or acknowledgement of the potential associative effects related to cultural landscapes and values within the Assessment (whilst noting that Ngāti Taka are generally supportive of the Project, subject to their recommendations being adopted). Furthermore, I note that a more recent Cultural Impact Assessment (CIA) has been prepared by **Pirirākau Hapu** which is not considered within the Landscape Assessment (noting that this CIA is not for public distribution and is partially redacted). Pirirākau identifies a series of cultural landscapes (again partly redacted) and identifies multiple recommendations for mitigation (also redacted). The Assessment does give some consideration to cultural landscapes (in relation to the visual amenity of a 'cultural hill feature'), which is addressed later within this review.
23. Overall, the Assessment concludes that the Project will result in **Moderate-High** adverse effects during construction, reducing to **Low** adverse effects at three to five years once mitigation planting has established. Whilst acknowledging that potential cultural landscape effects may require further investigation and consideration, I broadly agree with these levels of effect, as the Project includes extensive mitigation planting along the corridor and within the designation, which in my opinion (and if successfully implemented) once established, will assist in integrating the Project into the environment. The draft Designation Conditions include staged planting to be completed during the planting season following the completion of each stage of construction works. In my opinion, a three to five-year timeframe following completion of planting will ensure sufficient growth to successfully integrate the Project into the environment.
24. It is for mana whenua and the relevant iwi / hapu groups to advise on the potential effects of the project on the broader cultural landscapes or cultural values.
25. A review of proposed works within the Outstanding Natural Landscape is addressed separately within this report.

Natural Character

26. The assessment of landscape character effects provides a high-level description and analysis of effects on watercourses and wetlands as they relate to the broader landscape characteristics of the site; however in my opinion, the Assessment does not adequately address potential effects on **natural character** under Section 6(a) of the RMA. The assessment within the table at 6.2 (LT3) concludes a **High** (adverse) short term effect on the watercourses and wetlands, with a **Moderate – High** (beneficial) long term effect. This analysis is supplemented with additional high-level descriptions within the assessment of each landscape unit at 6.2.1-6.2.4.
27. In my opinion, it is unclear how these conclusions have been reached with no analysis of biotic, abiotic or experiential attributes or identification of natural character values of streams or wetlands within the project designation. In my opinion, an assessment against natural character values should be provided as its own section within the Assessment and should separately consider potential effects on watercourses and wetlands resulting from the proposed realignments, diversions, culverts and modifications.
- 28. I am therefore unable to review potential effects on the natural character of streams and wetlands within the proposed designation.**

Visual Amenity

29. As outlined above, I have reservations on the reliability and accuracy of the ZTV. I have therefore not relied upon this analysis within this review to inform the potential visual catchment of the Project.
30. I broadly agree with the description of the visual catchment at 6.3.1 of the Assessment and agree that potential viewing audiences are largely limited to residences in the localised area, motorists travelling on the surrounding roads and local public viewpoints (including from the harbour).
31. I agree with the combined approach of using a capacity analysis to provide an introductory and 'high-level' assessment of the landscape's ability to integrate the Project into the visual environment, which crucially is supported by a more detailed specific values-based assessment from representative viewpoints.
32. I agree that the visual effects of the Project will be the greatest during the construction period, and will diminish once the Project is operational, and particularly once the landscape mitigation measures establish and mature; noting that prior to the establishment of planting, earthworks scarring will likely remain visually prominent.
33. Section 6.4 of the Assessment provides an 'Analysis of Visual Effects from Private Properties and Public Locations', which is supported by the detailed analysis within Appendix A2 and the property locations and site photos within Appendix C. The following table provides a review of the identified visual amenity effects. Where there is a material

difference in professional opinion, further explanation is provided. Effects from residences sought to be removed to facilitate the designation have not been considered.

Property ID	Timeframe	Assessor's Effect	Reviewer's Effect
#1 1311c SH2	Construction	Moderate High adverse	High adverse
	Operational (3yr+)	Low adverse	Moderate adverse
	NOTES: The dwelling has open and expansive views across the designation towards the harbour. In my opinion, during construction, the proposed earthworks and movement of machinery (including cranes) will significantly detract from the outlook from this property, with the proposed overpass being constructed approximately 22m above existing ground levels. During operation, the overpass bridge will remain a prominent component of the outlook, with lighting further detracting from the outlook during night time hours.		
#2 1339 SH2	Construction	Low Moderate adverse	Low Moderate adverse
	Operational (3yr+)	Low adverse	Low adverse
#3 1355 SH2	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Moderate adverse
	NOTES: In my opinion, the proposed earthworks and removal of established vegetation will result in Moderate adverse long-term effects from this location. The proposed driveway on the north-eastern side of the property will retain open views and restrict mitigation planting to the falling slope on the highway batter. In my opinion, this mitigation planting (due to its location on a falling batter slope) will likely not assist in containing or screening views from this location until mature (circa 10-15 years).		
#4 1361b SH2	Construction	Moderate High adverse	Low Moderate adverse
	Operational (3yr+)	Low adverse	Low adverse
	NOTES: It is unclear if the Assessment considers Moderate High adverse effects due to 1361a SH2 being removed to facilitate the project. 1361b is located on a south facing slope, with primary outlooks to the south and west – away from the Project corridor to the north, however some more distant views along the alignment to the west may be available. In my opinion, effects during construction will be no more than Low Moderate, with separation achieved through topography and retained vegetation.		
#5 4 Francis Road	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Low adverse	Low adverse
	NOTES: Noting that this property is within the Medium Density Residential Zone.		
#6 467 Ōmokoroa Road	Construction	Low adverse	Very Low adverse
	Operational (3yr+)	Nil	Nil
#7 468 Ōmokoroa Road	Construction	Nil	Low adverse
	Operational (3yr+)	Nil	Nil

	NOTES: The eastern part of this property includes development on slightly higher elevation which experiences views along Ōmokoroa Road, towards the proposed roundabout / overpass. More immediate views of the road upgrades to Ōmokoroa Road will also likely be available, seen within the context of the existing corridor.		
#8 467 Ōmokoroa Road	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Very Low adverse	Very Low adverse
#9 25a Youngson Road	Construction	Low Moderate adverse	Moderate adverse
	Operational (3yr+)	Low adverse	Low adverse
#10 25b Youngson Road	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Low adverse
#11 1245 SH2	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Moderate positive	Low positive
	NOTES: I disagree that the existing SH2 is not visible from this location, with photograph 11b illustrating a van moving along the existing road corridor. The Project will require both cut and fill earthworks on the eastern side of the highway which will be visible from this location. I agree that the construction effects will be Moderate adverse, and that the proposed mitigation planting will result in positive long-term effects.		
#12 1215 SH2	Construction	Low adverse	Low Moderate adverse
	Operational (3yr+)	Low positive	Low positive
#13 1197 SH2	Construction	Very Low adverse	Very Low adverse
	Operational (3yr+)	Very Low adverse	Very Low adverse
#14 1101, 1109, 1113, 1140 SH2	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Low adverse
#15 10 Albert Lane	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Low adverse
#16 1058 SH2	Construction	Moderate adverse	Moderate High adverse
	Operational (3yr+)	Low positive	Nil
#17 555c Old Highway	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
#18 555b Old Highway	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Moderate positive	Low adverse
	NOTES: Proposed mitigation planting and the proposed stream alignment will be located on cut slopes below the view from this outlook. I agree that mitigation planting will assist in integrating the Project over time, however due to the proximity of the cutting, more open views of the highway will likely be available.		
#19	Construction	Moderate High	High adverse

571 Old Highway		adverse	
	Operational (3yr+)	Low adverse	Moderate adverse
	NOTES: Proposed cut earthworks are immediately adjacent to the dwelling (located within the curtilage – refer Appendix E) and will result in direct and open views of the highway (which is located on fill earthworks at this location, raised out of the valley floor). I agree that mitigation planting will assist in integrating the Project over time, however due to the proximity of mitigation planting to the residence, it is likely that views to the broader landscape setting and harbour will also be obscured.		
#20 Carine Garden Centre & Water World	Construction	Low Moderate adverse	Low Moderate adverse
	Operational (3yr+)	Very Low adverse	Very Low adverse
#21 8A Te Karaka Drive	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
#22 2-10 Munro Road	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Low adverse
#23 4 Te Karaka Drive	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
#24 940 SH2	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
#25 22 Munro Road	Construction	Moderate High adverse	Unable to conclude effect
	Operational (3yr+)	Very Low adverse	
	NOTES: This property is located on a page break within the mitigation plans (Appendix E). On the first page, the property appears removed, replaced with mitigation planting. On the second page, the property is retained, and at the toe of a substantial fill.		
#26 3 Gill Lane	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Low Moderate adverse
#27 Munro Development	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
#28 841 SH2	Construction	Moderate High adverse	Moderate adverse
	Operational (3yr+)	Low adverse	Low adverse
#29 Hill Feature (The Knolls / U14/1284)	Construction	Moderate adverse	Unable to conclude effect
	Operational (3yr+)	Low positive	
	NOTES: it is unclear why 'The Knolls' is included within the table for visual effects as the feature itself is not publicly accessible. In my opinion, potential effects on this feature are best considered separately, and are addressed later within this report.		
#30	Construction	Moderate High	Moderate High

17 Te Puna Quarry Road		adverse	adverse
	Operational (3yr+)	Low adverse	Low adverse
#31 35 Te Puna Quarry Road	Construction	Very Low adverse	Low adverse
	Operational (3yr+)	Very Low adverse	Low adverse
	NOTES: It is assumed that the property assessed is 37 Te Puna Quarry Road, which is consistent with the placement of the ID marker in Appendix C, and the detailed description within Appendix A2; noting that 35 Te Puna Quarry Road is assessed under #40 below.		
#32 37 Te Puna Quarry Road	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Very Low adverse	Very Low adverse
	NOTES: It is assumed that the property assessed is 17 Munro Road East, which is consistent with the placement of the ID marker in Appendix C, and the detailed description within Appendix A2.		
#33 6A Ainsworth Road	Construction	High adverse	High adverse
	Operational (3yr+)	Very Low adverse	Low adverse
#34 27 Ainsworth Road	Construction	Moderate High adverse	Moderate adverse
	Operational (3yr+)	Moderate positive	Low positive
#35 699a SH2	Construction	Very Low adverse	Low adverse
	Operational (3yr+)	Moderate positive	Low positive
#36 33 Loop Road	Construction	Very Low adverse	Very Low adverse
	Operational (3yr+)	Very Low adverse	Very Low adverse
#37 l'Anson Reserve	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
#38 491 Ōmokoroa Road	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Moderate positive	Low positive
#39 492 Ōmokoroa Road	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low adverse	Low adverse
#40 31a, 35, 39 Te Puna Quarry Road	Construction	Moderate adverse	Low adverse
	Operational (3yr+)	Low adverse	Low adverse
#41 34 Barrett Road	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Low Moderate positive	Very Low positive
	NOTES: In my opinion, this assessment is also representative of 24 Barrett Road which is located to the north of 34 Barrett Road and has northerly and easterly views. In my opinion, the mitigation planting will assist in integrating the Project into the environment, however will be seen in place of the existing planting which is to be removed.		
#42 67c Munroe Road	Construction	Low Moderate adverse	Low adverse
	Operational (3yr+)	Low positive	Very Low adverse

#43 860 Sh2	Construction	Moderate adverse	Moderate adverse
	Operational (3yr+)	Low positive	Low positive
#44 27 Loop Road	Construction	Low adverse	Low adverse
	Operational (3yr+)	Low adverse	Low adverse
#45 Tawhitinui Marae	Construction	Nil	Nil
	Operational (3yr+)	Nil	Nil
	NOTES: I agree that the existing vegetation within the area provides a strong degree of visual containment, however specific effects on cultural values including effects on cultural landscapes are better addressed by mana whenua.		
#46 Tawhitinui Marae Urupa	Construction	Moderate adverse	Moderate High adverse
	Operational (3yr+)	Nil	Low adverse
	NOTES: The elevated location of the urupa has broad and expansive views across the landscape and towards the harbour and Mauao. The proposed construction works will be visible across this vista (albeit staged and situated lower down in the view), where earthworks and vegetation removal is required to 'build-up' the road. In my opinion, visual amenity from the Urupa will be moderate high, however specific effects on cultural values including effects on cultural landscapes are better addressed by mana whenua.		
Road Users (Existing SH2 and Local Roads)	Construction	Moderate High adverse	Moderate High adverse
	Operational (3yr+)	Moderate positive	Nil
Views from Tauranga Harbour	Construction	Not assessed	Low – Moderate High adverse
	Operational (3yr+)		Nil – Low adverse
	NOTES: In my opinion, views from the broader Tauranga Harbour setting are likely to be well contained by intervening topography and vegetation, and will result in Low adverse effects during construction, and nil effects once operational. In my opinion, whilst effects from the broader harbour setting are likely to be low, effects from recreational users of the Te Puna Estuary inlet / Stream will likely be Moderate High during construction as a result of the additional bridge, reducing to Low once operational; acknowledging that users of the stream are transient and would be travelling along this corridor.		
29 Plimmers Point Road	Construction	Not assessed	Moderate High adverse
	Operational (3yr+)		Low adverse
	NOTES: The proposed realignment of Plimmers Point Road will result in cut earthworks and vegetation removal within the curtilage of this property, south of the residence, which will result in open views to the south and the more immediate proximity of the road long term.		
Properties along Estuary View	Construction	Not assessed	Low Moderate adverse
	Operational (3yr+)		Very Low adverse
	NOTES: Some properties will likely experience elevated views along the		

	corridor alignment, however views are generally orientated north across the broader harbour setting.		
Residential properties along the Minden Hills	Construction	Not assessed	No more than Low Moderate adverse
	Operational (3yr+)		No more than Very Low adverse
	NOTES: Some properties located along the Minden Hills include elevated and expansive vistas across the broader designation site towards the harbour. Views are generally distant.		

34. In summary, I broadly agree with the levels of effect identified within the Assessment and find that effects on visual amenity from residences within the immediate and localised setting will generally be **Moderate – Moderate High** during construction (with some effects from specific properties being **High**). In my opinion, once mitigation planting has established (3-5 years following planting of each stage), effects will generally reduce to **Low** adverse, with some effects being positive.

Relevant Planning Matters

35. A high-level assessment against **Relevant Planning Matters** is provided at section 7 of the Assessment. This states that the Project works do not (except for wetland restoration) extend into the **Coastal Environment**; therefore, the New Zealand Coastal Policy Statement (NZCPS) policies are not considered. I note that the project works illustrated within the designation, whilst detailed, are indicative, and feasibly construction works or lay-down areas could occur anywhere within the proposed designation boundary (so long as they give effect to the proposed designation conditions). Whilst I generally agree with the approach taken within the Assessment, in my opinion, a condition should be provided which prohibits works within the coastal environment (except for wetland restoration) to ensure that the values and characteristics of the coastal environment are protected (noting that a proposed borrow-pit and cut earthworks associated with the designation alignment are indicatively shown immediately adjacent to the coastal environment boundary). Should works occur within the coastal environment, an assessment against the relevant objectives and policies of the NZCPS should be undertaken.
36. The Assessment provides a high-level analysis of visual amenity effects on Identified **Significant Historic Heritage Features** at 4 Francis Road, concluding a **Low** adverse effect once the main alignment is completed. In my opinion, the visual amenity effect on these heritage features is consistent with the effect on the main property at 4 Francis Road, being **Moderate** adverse during construction reducing to **Low** adverse once planting has established (3-5 years).
37. The Assessment includes a brief and high-level analysis of the Project in relation to the proposed works within **Outstanding Natural Landscape (ONL)** S8 and S8a, with the proposed corridor alignment (including earthworks) and proposed borrow pit located

within these ONLs. Parts of the proposed designation alteration also borders the Tauranga Harbour ONFL (as identified by Bay of Plenty Regional Council).

38. There is no assessment of the Project against the landscape values of these three ONL / ONFL. The analysis, in my opinion, is not sufficient to address potential effects, and the project description is lacking sufficient information (notably around the scale, location and proposed remediation of the borrow pit) to inform the assessment. **The Assessment does not identify a level of effect on the ONLs / ONFL, and I am unable to review due to insufficient information.**

Other Assessment Matters

39. As outlined within the table above, the Assessment considers potential visual amenity effects relating to the removal of a “hill feature” (ID#29).
40. A redacted (and not for public distribution) Cultural Impact Assessment by Pirirākau Hapu seemingly identifies this landform feature as being part of the cultural landscape of Te Haumu. Within the Assessment of Archaeological Values, the feature is identified as U14/1284 (the Knolls) and is assessed as most likely being a site of crop storage pits; with interpretation of this site as a pā not being supported. The Archaeological Assessment identifies this feature as being located within the existing designation boundary, however the plans which support the Landscape Assessment (Appendix B) show this feature as being outside of the existing designation boundary.
41. The Concept Landscape Mitigation Plans (Appendix E) indicate that The Knolls will be removed and replaced with a graded cut slope and planted with native vegetation.
42. The Landscape Assessment concludes that effects on visual amenity values will be **Moderate** adverse, reducing to **Low** positive once planting is established. In my opinion, this landform feature is best assessed against landscape and cultural values (as opposed to visual amenity values⁴), with consideration of physical, associative (including shared and recognised values) and perceptual attributes. It is for mana whenua and the relevant iwi / hapu groups to advise on the cultural effects (on the broader cultural landscapes or cultural values) of the potential loss of this feature.
43. Overall, in my opinion (and whilst noting the requirement for input from mana whenua), I agree with the overall assessment of landscape character of **Moderate-High** adverse effects during construction, reducing to **Low** adverse effects once planting has established, where at a ‘corridor-scale’ the knoll is a localised feature within the broader landscape setting which includes rolling landform along the alignment.
44. It is unclear what measures have been considered by the applicant to avoid, remedy or mitigate potential adverse effects on this feature, beyond its removal and replacement

⁴ As The Knolls is not publicly accessible and does not in itself represent a viewpoint to assess. It is a natural landform feature which, whilst distinctive, forms part of the broader landscape setting of the corridor.

with mitigation planting. In my opinion, it would be beneficial to understand if a vertical cut face has been explored at this location so that the knoll (storage pits) can be retained in situ should cultural assessment recommend its retention.

Mitigation Measures

45. The Assessment includes a series of recommended mitigation measures at Section 8. I generally agree with the mitigation measures outlined within the Assessment, which if applied will assist in integrating the Project into the environment over time. Of particular importance is the proposed extent and timing of mitigation planting:
- The extent of mitigation planting is illustrated on the Concept Landscape Mitigation Plans within Appendix E to the Assessment.
 - The timing of mitigation planting is detailed within the proposed conditions (LV3(L)), stating *“A planting programme including the staging of planting in relation to the construction programme, which shall, as far as practicable, include provision for planting within each planting season following completion of each stage of Construction Works”*
46. The Assessment places weight on the proposed planting to mitigate effects (at ‘Operational 3+ years’). In my opinion, 3 – 5 years is generally sufficient to allow time for establishment of planting for this type of project; however It should be noted that the proposed condition allows flexibility over the staging of planting to occur the planting season following construction *as far as practicable*. To confirm, effects will reduce 3-5 years following the implementation of planting, not 3-5 years following the construction of the alignment.
47. The Assessment also includes the recommended mitigation measure to *“integrate cut and fill batters with existing topographical features”*. I am supportive of this approach, however it is unclear if this has been applied to the indicative route alignment, noting the proposed cut earthworks at ‘The Knoll’.

Conclusions

48. Overall, I broadly agree with the findings of the Assessment, however in my opinion, there remains substantial gaps in the report in relation to potential effects on natural character and ONFLs:
- I agree with the levels of effect identified for landscape character being **Moderate-High** adverse during construction, reducing to **Low** adverse once mitigation planting has established; however associative attributes (including consideration of cultural landscapes) may require further investigation and assessment.
 - I broadly agree with the levels of effect identified for visual amenity from residences within the immediate and localised setting being **Moderate – Moderate High** during construction (with some effects from specific properties being **High**). In

my opinion, once mitigation planting has established (3-5 years following implementation of planting), effects will generally reduce to **Low** adverse, with some effects being positive.

- In my opinion, there is **insufficient information and assessment** to inform a review of potential effects on **natural character** values of wetlands and watercourses within the proposed designation boundary.
- In my opinion, there is **insufficient information and assessment** to inform a review of potential effects on **Outstanding Natural Features and Landscape** values which are located both within and immediately adjacent to the proposed designation boundary.

49. I agree that during operation, once mitigation planting matures, the project will be better integrated into the environment, and effects will (on balance) likely reduce to a **Low** level of effect. However, there are some localised visual amenity effects from specific properties which in my opinion will remain at a **Low – Moderate** to **Moderate** level during operation.
50. I disagree with the Assessment which states within the conclusions that *“the Project will result in minor adverse effects on the landscape and amenity values which will, in time diminish to less than minor adverse effects in general.”* In my opinion, this statement within the Assessment is inconsistent with the assessment of effects throughout the report, which identifies more than minor effects on both landscape character and visual amenity values, with some effects identified being significant (High).

Draft Conditions

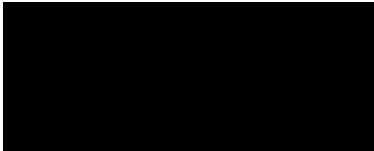
51. Working with the Western Bay of Plenty District Council, I have provided a review / comment on the landscape related draft designation conditions. I am generally supportive of the proposed conditions, however in my opinion the following three matters remain outstanding:
- In my opinion, there is insufficient information relating to the potential borrow pit located within ONL S8a to inform an effects-based assessment on landscape and visual amenity values. Following any information being made available, and an effects-based assessment being undertaken, it is recommended that a condition is provided which confirms the parameters (scale, volume, location etc) of the borrow pit and any remediation measures to be implemented once it is decommissioned.
 - The Assessment states that no works (with the exception of wetland enhancement planting) will be undertaken within the Coastal Environment boundary (as defined on the Regional Coastal Environment Plan maps). As the proposed designation boundary is across the Coastal Environment, it is recommended that a condition is provided which restricts any works within the Coastal Environment to wetland

enhancement planting only, prohibiting other activities such as earthworks and storage of construction materials / machinery etc.

- The extent of planting included within Appendix E to the Assessment is relied-upon to mitigate long term operational effects of the project. Whilst acknowledging that the project is for a designation (as opposed to a resource consent) where the alignment of the corridor is not yet confirmed, I recommend that a 'in general accordance with' condition is provided, which allowing for any future changes in the alignment within the designation boundary, will maintain the overall extent and general coverage of planting illustrated within the concept mitigation plans.

52. I hope this review assists in your understanding of the potential landscape and visual effects arising from the designation alteration. As discussed, I am happy to discuss the above matters. Please don't hesitate to contact me if you have any queries.

Yours sincerely



SIMON BUTTON

Associate Landscape Architect
Isthmus

