
26.03.2024

Dear Vanessa

Introduction

1. Thank you for the opportunity to review the Notice of Requirement (NoR) application for the development of a new Commercial Vehicle Safety Centre at 253 Mill Road, Bombay.
2. I understand the site is located within the Rural – Rural Production zone of the Auckland Unitary Plan Operative in Part (AUP(OP)).
3. My relevant qualifications and experience include:
 - Bachelor of Landscape Architecture (Hons) 2016 from Unitec (Auckland).
 - Graduate Member of Tuia Pito Ora / New Zealand Institute of Landscape Architects.
 - Seven years work experience working as a landscape architect, primarily reviewing resource consents for Auckland Council, both landscape design and landscape assessment; including EPA Fast Track consents, private plan changes and NoR.
4. I understand that the proposal is for a combined NoR and Resource Consent (BUN60424934) which requires consent as a discretionary activity¹; I am providing a review of the potential landscape effects resulting from the NoR only.

Relevant application material reviewed.

5. I confirm I have reviewed the relevant application material in relation to my review of the landscape effects, including:
 - Notice of Requirement for a Designation of Land prepared by Waka Kotahi NZ Transport Agency, dated 24th October 2023.
 - Assessment of Effects on the Environment prepared by WSP New Zealand Limited, dated 24th October 2023 (Revision D).
 - Landscape and Visual Effects Assessment prepared by WSP New Zealand Limited, dated 13th September 2023.
 - General Arrangement Plans prepared by WSP New Zealand Limited, dated 25th August 2023 (Revision 0A).
 - Compliance Station Drawings prepared by GHD, dated 3rd April 2024.
 - Inspection Shed Drawings prepared by Totalspan, no date.

Relevant s92 response material reviewed.

- S92 Response prepared by WSP New Zealand Limited, dated 26th January 2024.
- Assessment of Effects on the Environment prepared by WSP New Zealand Limited, dated 24th January 2024 (Revision E).

¹ Requires consent for regional and land use under Chapters E3.4.1 (A44), E7.4.1 (A28), E8.4.1 (A10), E26.5.3.2 (A107), E15.4.1 (A18), E30.4.1 (A6).

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- Landscape Visual Simulations Supporting Graphics (Appendix 1), prepared by WSP New Zealand Limited, dated 24th January 2024 (Version B).
 - Landscape Plans prepared by WSP New Zealand Limited, dated 25th January 2024 (Revision C).
 - Landscape maintenance and management plan prepared by WSP New Zealand Limited, dated 25th January 2024.
 - Compliance Station Drawings prepared by GHD, dated 11th December 2023 (Revision 1).
 - Signage Plans prepared by WSP New Zealand Limited, dated 19th January 2024 (Revision B).
 - Fencing Plan prepared by WSP New Zealand Limited, dated 13th November 2023 and Fence Details WSP New Zealand Limited, dated 21st February 2024 (Revision A).
 - Retaining Wall Detail 2 prepared by WSP New Zealand Limited, dated 13th November 2023 (Revision 0A) and Retaining Wall Details prepared by WSP New Zealand Limited, dated 19th January 2024 (Revision 0B).
 - S92 Response prepared by WSP New Zealand Limited, dated 18th March 2024.
 - Terra Mesh Wall Detail prepared by WSP New Zealand Limited, dated 8th March 2024 (Revision 0D).
6. I have undertaken a site visit, including to the surrounding area, to undertake my review of this application.

Proposal

7. The NoR proposes to establish a Commercial Vehicle Safety Centre (CVSC) at 253 Mill Road to support the safe operation of the state highway network. The location of the CVSC is located to strategically capture heavy commercial vehicles travelling between Auckland and Waikato / Bay of Plenty.
8. From the AEE I understand the CVSC site works covering 12,330m²², include the following:
- Earthworks (22,252m³ cut, and 184m³ fill over 11,190m²) to create a level platform resulting in retaining walls along the northern boundary (green terra mesh wall, 75.5m long, up to 1.8m high), eastern boundary (48.5m long timber retaining wall) and southern / south-eastern boundary (green terra mesh wall, 148.6m long, up to 3.7m high).
 - Area of hardstand for buildings, parking, inspection bays, water tanks and manoeuvring.
 - A heavy commercial vehicle inspection shed (279.795m² floor area, 40.55m long, 6.9m wide, 6.149m high, with a recessive appearance with an LRV no more than 40%).
 - A compliance station building (204m² floor area, 31.5m long, 9.135m wide (at its widest part), up to 4.6m high tapering, with a recessive material and colour palette with a LRV no more than 40%)
 - Site gates (setback ~20m from the western boundary) and fencing (2.44m high tensions wire mesh security fencing along the north, east and west boundaries, setback from retaining wall tops).
 - Site signage primarily naming and directional signs.

² The parent site is 52,400m².

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- Site lighting to be installed to operate 24 hours/day, with only security lighting when not operating.
 - Landscape treatment including planting to enhance the induced wetland to the north-east, planting along / on the terra mesh walls, and southern boundary, with the internal planting kept low at ~1m high.

Landscape methodology and context

9. The LVEA (WSP, 13.09.2023) has been prepared generally in accordance with the NZILA 'Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines,' including adoption of a seven-point scale of adverse effects as recommended in the guide. I have utilised the same scale when undertaking my review of the NoR (See Appendix A).
10. A singular visual simulation was prepared after a number were requested. The view is taken from outside 4 Christa Place looking west towards the site and illustrates the proposal including vegetation; it is noted that the planting is shown at 7-10 years growth (medium to long term), whereas best practice generally recommends planting to be shown at five years (short term). This has been considered when reviewing the effects of the proposal.
11. I concur with the site and local area description provided within the LVEA. I note that the local landform is expressive with undulating topography, with streams lined with exotic and native trees, and large areas of pasture and crop which reflects the agricultural use associated with the volcanic soils. However, the local area expresses a mixed rural character, with a variety of open farmland, crops, storage/supplies, services (e.g., petrol station), and residential living present.
12. I consider the following RPS Objectives and Policies are relevant to my review of the potential landscape, including character and visual amenity effects of the NoR.

B9.2.1 (3) – Rural production and other activities that support rural communities are enabled while the character, amenity, landscape, and biodiversity values of rural areas, including within the coastal environment, are maintained.

B9.2.1 (4) Auckland's rural areas outside the Rural Urban Boundary and rural coastal towns and villages are protected from inappropriate subdivision, use and development.

B9.2.2 (1) – Enable a diverse range of activities while avoiding significant adverse effects on and urbanisation of rural areas, including within the coastal environment, and avoiding, remedying, or mitigating other adverse effects on rural character, amenity, landscape, and biodiversity values.

Landscape Character Effects (Rural Character)

13. As described above the local area has a mixed rural character, this character is influenced by the proximity to the motorway, the adjacent neighbourhood centre with retail, food and

beverage, the Z Petrol Station and Shri Guru Ravidas Temple (both the later within the Rural – Rural production zone under the AUP(OP)), as well as the engine repair, timber packing and pump equipment supplier which are located along the western side of Great South Road to the north of the subject site. The residential catchment to the east and the surrounding agricultural uses (glass houses ~88,000m² to the west, open pastural fields and crops to the north and south). As such while the NoR works are not rural in character, it will not appear completely incongruent within its setting as a result of its immediate context.

14. The proposal will physically alter the landform of the site, and while this has occurred on other sites in the area to provide for forecourts, parking, and manoeuvring; the proposal requires long and high retaining walls (up to 3.7m high) which are not common within the catchment. The proposed earthworks and retaining, will re-shape the gentle slope of the site, to one with a more engineered appearance which will in the short term (5 years) appear out of character, where the land is characteristically flat with undulation near streams or gently rolling hills.
15. The compliance building will not be out of scale with the structures within the immediate environment, including the Z Station Service Court Pump Station which measures ~34m long and 8m wide. The variation of the building footprint, elevation materials and colours and sloped roof (shed roof) and set back from the road over 50m will help to ensure it does not dominate the road edge and is in line with the character of buildings being setback from the road in the rural landscape.
16. The inspection shed is not considered to appear incongruent, albeit a longer and taller rectilinear shaped building. This building unlike the compliance building has little architectural variation or features, and is more typical of a large rural shed, with a high roller door. However, the building is comparative to other buildings in this landscape, including the long run shed on site to the south measuring over 76m long or the row of sheds at Pt Lot 1 DP 50718 Great South Road to the south combined measuring ~130m long.
17. While individually the built form will not appear out of place, the collective elements of the NoR will have initial adverse low-moderate effects on landscape and rural character values. This is a result of the proposed landform modification, retaining walls, two long-run buildings, 2.44m high security metal mesh fencing, lighting and the hardstand curtilage area required.
18. Due to the scale of the hardstand, lights, retaining walls and the security fence (which is positively set back from the road edge) the reliance on planting to successfully establishing to integrate, soften or screen the proposal is critical to enable a visual outcome that will in the medium timeframe sit more suitably within the landscape.
19. Planting the length of the stream edge to the north of the site was recommended to provide screening of the northern wall and buildings; however, this was not adopted into the landscape plan. I remain of the view, should the existing pines decline (located outside of site), that planting the northern boundary (currently to be grass with exception to the north-west corner)

would help in softening the appearance of the landform modification and better integrate the site with the neighbouring rural site.

20. The proposed use and infrastructure required on site will not be fully in keeping with the existing rural character of the area, specifically the more productive uses present along the eastern side of Great South Road. This will have a short-term effect on rural character values, as the location is at the gateway between the motorway and neighbourhood centre as it transitions into the lower density and productive landscape of Bombay. In the medium to long term, once the proposed planting has established to better soften the landform changes, and due to the adjacent land uses, including a temple with large parking area, and service station with pump, parking (including for trucks), the proposal will not appear out of place.
21. In my opinion, the use of recessive colour buildings, which are setback from the road, and the success of the proposed boundary and screen planting will be important to ensure that in the medium term the proposal will appear appropriate within this modified mixed rural Bombay catchment.
22. The proposal is considered to modify some key characteristics of the landscape to result in low-moderate³ adverse landscape and rural character effects initially, reducing to low effects in the medium term.

Visual amenity effects

23. Visually while the site is separated from the residential catchment to the east and the subject site is located at a lower elevation, due to the generally open characteristics of the land in between (pasture, crops), the subject site is the foreground of the key outlook for some of the residents of the properties along Christa Place and Bombay Road ((Residential – Rural and coastal settlement zone) and Mill Road (Rural – Production).
24. The residential catchment is located just over 220m to the east, at an elevation of 185m – 210m (site sitting at 165-170m after earthworks). As a result of the elevated nature of these properties along Christa Place, Bombay Road and Mill Road, the amenity afforded to these residents includes:
 - Areas of open pasture (e.g., 253 Mill Road and 165 Mill Road)
 - Rows of crops (e.g., 281 Great South Road)
 - Large scale glass houses (187a Mill Road)
 - Patches of dense vegetation (e.g., 165c Mill Road)
 - Areas of hard stand (Z-Station along Great South Road)
 - Non rural or residential development (e.g., 1998 Great South Road – Shri Guru Ravidas Temple)
 - Some signage and lighting (e.g. Z-Station free-standing plinth, Great South Road)

³ Appendix A – Low-moderate rating definition – *minor loss of or modification to one or more key elements / features / characteristics, i.e., new elements are not prominent within views or uncharacteristic within the receiving landscape.*

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- Generally low density rural-residential and residential development with landscaped, vegetated, or open yards.
 - Flat to undulating landform within the foreground.
 - Back dropped with dynamic vegetated and open hills.

25. With reference to the above landscape and visual amenity values above, I consider the proposal will have the following effects on the owners/occupiers of the following properties.

3 Christa Place

26.1 Very low⁴ adverse visual amenity effects on this property due to the undeveloped nature of the site.

4 Christa Place

26.2 This property is located at approximately the same location that the visual simulation has been prepared from. The public view along Christa Place is unimpeded due to the angle of the road and drop in elevation as it descends. Equally the dwelling at 4 Christa Place is anticipated to have views out over the proposal (with a number of north facing windows and north-west facing patio). The property at 6 Christa Place located to the west and planting on the boundary may partially reduce views, but the elevation of 4 Christa Place means outlook over is retained.

26.3 While the background will still express the rural values (glass houses, undulating hills, bush along streams) the proposal will remove the rural buffer and shift the urban (non-rural) elements further into the rural landscape. The proposal will occupy the open pastoral pocket in the foreground, reducing the sense of spaciousness or openness and the aesthetic rural landscape values for these residents to a low adverse visual amenity effect.

5 Christa Place

26.4 This property is located along the south of Christa Place and is orientated north, with a western patio and northern deck. Vegetation, landform, and orientation of the dwelling means that main views are likely to be more orientated north over Christa Place. The visual amenity values of these residents are considered to be impacted to a low adverse visual amenity effect.

6 Christa Place

26.5 While this property is elevated above the subject site, it is located lower than 4 Christa Place and is also slightly orientated to the north. Due to elevation, intervening built form and vegetation and orientation of the building, more north over 281 Great South Road, the proposal is considered to result in low adverse visual amenity effects on this property.

⁴ Appendix A – Very low definition – negligible loss of or modification to key elements / features / characteristics of the baseline, i.e., approximating a ‘no change’ situation and a negligible change in views.

7 Christa Place

26.6 The boundaries of this property are continuously planted with hedges or topiary. However, the location of the property would mean that occupants would have direct views across to the site. The vegetation within their own property would filter views; however, this should not solely be relied upon. In my opinion, the development would result in low adverse visual amenity effects on this neighbour.

8 Christa Place

26.7 This property is elevated and is a two-storey house that is not impeded by the location of the dwelling on 10 Christa Place west of it, however the property is ~450 east of the development. A west facing deck is present (I note a there is also an east facing deck), as well as large west facing windows. For the reasons explained under 4 Christa Place, the proposal is considered to result in low-moderate adverse visual amenity effects.

9 Christa Place

26.8 This property is the closest of the residential properties along Christa Place to the site at ~330m away and has unimpeded views to the west out over the site, including the existing building on the eastern boundary, metalled area, and parking area (occupied by a truck on my site visit). The proposal will occupy the currently open rural landscape within their primary outlook. The property does also have views north over the larger crop field, and in the foreground of the view.

26.9 The works are within the rural zone, where glass houses (such as those further west) can be implemented; while still rural these can significantly occupy the landscape and subsequently alter the visual values. As such built form in the landscape would not be out of place.

26.10 For the reasons outlined under 4 Christa Place is considered to result in moderate⁵ adverse visual effects on these residents, however, it is recognised that the amenity afforded by rural landscapes, can still currently be appreciated to the north and in the foreground.

10 Christa Place

26.11 This property similar to 8 & 9 Christa Place is orientated towards the west, however it sits behind the dwelling at 9 Christa Place, as well as having a well vegetated front yard. These aspects reduce the views out of the property. However, for similar reasons as outlined above for 4 Christa Place, the proposal is considered to result in low-moderate adverse visual amenity effects for these residents.

253 Mill Road (parent site)

26.12 The proposal will shift the values of the landscape for occupants of this property, removing the rural characteristics of the site, to a more urban scale and nature of use, resulting in a moderate

⁵ Appendix A – rating and description – Moderate *partial loss of or modification to key elements / features / characteristics of the baseline, i.e., the pre-development landscape character remains evidence, but materiality changed and prominent in views. Concise Oxford English dictionary definition – Moderate: adjective – average in amount, intensity, quality, or degree.*

level of visual amenity effects for any permanent occupants, and low for workers noting the current use of the site with long-run sheds and trucks.

1998 Great South Road

26.13 The users of the Shri Guru Ravidas Temple will have temporary views and experience of the proposal. Depending on the direction on arrival or leaving the temple, the site currently establishes the transition between the rural landscape and the more urban centre. However, when seen opposite the service station and forecourt the proposal may not appear as uncommon. The scale of the proposal, in terms of the number of buildings now on site, the extent of hardstand, signage, security fencing and lighting will however appear more intense than the petrol station and will detract from the amenity values of the area to a low-moderate degree for these visitors.

229 Mill & 2020 Great South Road

26.14 Due to the transient nature of users of the Z Station (229 Mill Road & 2020 Great South Road), it is considered that the proposal will have very low to low adverse visual amenity effects on these users.

279 Mill Road

26.15 In my opinion, due to the orientation of the building at 279 Mill Road (Lot 3 DP 124783), the existing building on the eastern boundary of the subject site and vegetation within the view, that the proposal will not be in primary outlook (orientated more north over the rural agricultural property at 281 Mill Road) and will result in low adverse visual amenity effects.

Properties along Mill Road and Residential properties along Bombay Road

26.16 I have also considered the properties to the east along Bombay Road and Mill Road, as they are also elevated, and as evident from my site visit, have similar views to the properties along Christa Place.

26.17 In my opinion the proposal would result in low adverse visual amenity effects on the amenity of residents at 168, 170, 176 & 180 Bombay Road. While these properties also benefit from separation and elevation to achieve views out over the rural agricultural sites to the north, the western view due to the orientation of buildings and outdoor areas is as equal.

26.18 Due to intervening landform, built form, vegetation, elevation, and orientation of dwellings the proposal is considered to result in very low to low adverse visual amenity effects on occupants at 184 Bombay Road, 287, 295 and 303 Mill Road.

Audience travelling along Mill Road and Great South Road

26.19 For motorists travelling south along Great South Road the existing pine trees within the neighbouring site, and the proposed planting at the north-west corner as identified on the landscape plan will partially screen the proposal, with views when passing being transient in

nature. If the pines were removed / died, the exposure of the site for those travelling south would be greater, the large retaining walls initially would also appear incongruent until softened by planting. As noted above, I remain of the view that should the pines decline and that they are outside of the site, that planting the full extent of the northern boundary (currently to be grass with exception to the north-west corner) would aid in better integrating the site visually.

26.20 For those travelling north along Great South Road, the NoR works would not appear completely out of character, having the context of the Bombay centre, service station and temple. It would however push the gateway between urban and rural Bombay further north and east.

26.21 For those travelling west along Mill Road the proposal will be seen in glimpse views and primarily within the periphery of views, until reaching the roundabout where the site is more visible. The NoR will shift the edge of the rural landscape further north and east, however, it will not appear completely out of context with the adjacent service station and temple.

Visual Amenity Effects summary

27. Initially the proposal is considered to result in very low up to moderate adverse visual amenity effects on a number of properties / residents / visitors within the immediate area. The NoR will remove the rural land within part of the views for some residential neighbours which currently provides visual buffer / visual relief between the motorway. It is recognised however that the crop land in the foreground and north will still be appreciable for many.
28. Over time with the establishment of planting, some of the effects from the earthworks / retaining walls, fencing and hardstand will appear better integrated, however this will take until the medium term as suggested by the visual simulation prepared by the applicant. The visual amenity effects of the proposal on residents will reduce to low.
29. The proposal is not considered to significantly impact on the amenity values of those travelling along public roads, as views will be transient; however, the proposal will shift the gateway between urban and rural Bombay slightly north and east.

Property / Location	Effect Rating (Short Term – 5 Years)	RMA (relating to minor)
3 Christa Place	Very low	Less than minor
4 Christa Place	Low	Minor
5 Christa Place	Low	Minor
6 Christa Place	Low	Minor
7 Christa Place	Low	Minor
8 Christa Place	Low-moderate	Minor
9 Christa Place	Moderate	More than minor
10 Christa Place	Low-moderate	Minor
253 Mill Road (parent site) – Dwelling and workers	Moderate Low	More than Minor
1998 Great South Road (Shri Guru Ravidas Temple)	Low-moderate	Minor

229 Mill & 2020 Great South Road (Z Service Station)	Very low to Low	Less than minor
279 Mill Road / Lot 3 DP 124783	Low	Minor
168, 170, 176 & 180 Bombay Road	Low	Minor
184 Bombay Road, 287, 295 and 303 Mill Road	Very low to Low	Less than minor
Motorists Mill Road and Great South Road	Very low to Low	Less than minor

Conclusion

30. Overall, following my review of the application from a landscape perspective, it is considered that in the short term the NoR will result in inappropriate adverse visual effects on nearby properties up to a moderate degree. But in the medium to long term when taking into consideration the modified and mixed character of the area, the proposal will not appear inconsistent with the character due to existing context and will result in low adverse landscape effects.

Recommendations

31. The following conditions are suggested.
32. The general NoR condition offered should be updated to include the following references (underlined).
1. *Except as provided for in the conditions below, works within the designation shall be undertaken in general accordance with the following plans and information submitted with the Notice of Requirement dated 24 October 2023:*
 - i. *Section 2 Description of Proposed Work in the Assessment of Effects on the Environment dated 24 October 2023.*
 - ii. *General Arrangement Plans dated 19 September 2023.*
 - iii. *Architectural Design Plans: Inspection Shed and Compliance shed, dated 11th December 2023*
 - a. *Fencing plan (13.11.2023) and fence details (21.02.2024)*
 - b. *Terra Mesh Wall Detail (08.03.2024)*
 - iv. *Landscape General Arrangement Plan and Landscape Plans dated 25th January 2024 and Landscape maintenance and management plan, 25th January 2024.*
 2. Use of recessive, low reflective colours (a light reflectivity value of less than 40%) and material finishes for buildings and structures (including site security fencing and walls) to minimise their visibility in the landscape. Avoid visually conspicuous and bright colours. Colours to be confirmed prior to commencement of construction.
 3. The landscape treatment and landscape maintenance and management plan must be implemented within the first planting season (May to September) following the completion of the project works.

Landscape Specialist Advice for: 253 Mill Road, Bombay (WBS D.002392)
Consent Number: Notice of Requirement – Waka Kotahi NZ Transport Agency
Planner: Vanessa Leddra, Policy Planner Plans & Places



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4. The grass lawn to the north of the works site must be planted with native species to support the riparian edge and integrate the landform changes relating to the project works. Species must be a mix of grasses, shrubs, and trees.

Should you wish to clarify anything further regarding this memo, please contact me.

Kind regards,

Gabrielle Howdle
Principal Landscape Architect
Tamaki Makaurau Design Ope

[Appendix A: Rating of Effects 7-Point Scale – Landscape and Visual Effects Assessment WSP](#)

Rating of effects

Effect Rating	Use and Definition
Very Low (V-L)	Negligible loss of or modification to key elements / features / characteristics of the baseline, i.e., approximating a 'no change' situation and a negligible change in views.
Low (L)	Little material loss of or modification to key elements / features / characteristics, i.e., modification or change is not uncharacteristic or prominent in views and absorbed within the receiving landscape. <u>Concise Oxford English Dictionary Definition</u> Low: adjective- 1. Below average in amount, extent, or intensity.
Low-Moderate (L-M)	Minor loss of or modification to one or more key elements / features / characteristics, i.e., new elements are not prominent within views or uncharacteristic within the receiving landscape.
Moderate (M)	Partial loss of or modification to key elements / features / characteristics of the baseline, i.e., new elements may be prominent in views but not necessarily uncharacteristic within the receiving landscape. <u>Concise Oxford English Dictionary Definition</u> Moderate: adjective- average in amount, intensity, quality or degree
Moderate-High (M-H)	Modifications of several key elements / features / characteristics of the baseline, i.e., the pre-development landscape character remains evident but materially changed and prominent in views.
High (H)	Major modification or loss of most key elements / features / characteristics, i.e., little of the pre-development landscape character remains and a major change in views. <u>Concise Oxford English Dictionary Definition</u> High: adjective- Great in amount, value, size, or intensity.
Very High (V-H)	Total loss of key elements / features / characteristics, i.e., amounts to a complete change of landscape character and in views.

Appendix A.2: Excerpt from Te Tangi a te Manu (2022)

