



IN THE MATTER of the Resource Management Act 1991 (“RMA” or “the Act”)

AND

IN THE MATTER of applications under section 88 of the Act to the **Tasman District Council** by **Tasman Bay Asphalt Limited** for resource consents for an Asphalt Plant (**RM201000, RM201002, RM201018**)

**EVIDENCE OF ROB GREENAWAY
ON BEHALF OF TASMAN BAY ASPHALT LIMITED
(RECREATION)**

1. INTRODUCTION

- 1.1 My full name is Robert James Greenaway. I am an independent recreation and tourism planner.
- 1.2 This evidence is given on behalf of Tasman Bay Asphalt Limited (the “Applicant”). The Applicant has applied for:
- (a) Land Use consent to construct and operate an Asphalt Plant and build an acoustic barrier (RM201000);
 - (b) Discharge Permit to discharge contaminants from an Asphalt Plant to air (RM201002); and
 - (c) Land Use Consent to undertake earthworks within 10 metres of the toe of the Waimea stop bank (RM201018).
- 1.3 This evidence addresses the effects of the activities for which consent is sought on recreation. I refer to the overall proposed activity as either the “Proposal” or the “Asphalt Plant”.

Qualifications and experience

- 1.4 I am a consultant recreation and tourism planner with more than 30 years' experience.
- 1.5 I graduated from Lincoln University in 1987 with a three-year Diploma in Parks and Recreation Management with Distinction, and completed 18 months of postgraduate study in conservation management. I hold the status of an Accredited Recreation Professional with Recreation Aotearoa (the New Zealand Recreation Association), and I am a member of the Recreation Aotearoa of Accreditation for member accreditation to professional status. I am also long-term member of the New Zealand Association for Impact Assessment. In 2011 I was appointed as an inaugural Board member of the Sir Edmund Hillary Outdoor Recreation Council, to assist Sport New Zealand with the implementation of the National Outdoor Recreation Strategy, amongst other things.
- 1.6 I was awarded the Ian Galloway Memorial Cup in 2004 by Recreation Aotearoa (of which I am a past Executive Member) to recognise "excellence and outstanding personal contribution to the wider parks industry". In 2013 I was awarded the status of Fellow.
- 1.7 Between 1990 and 1995 I worked with an international tourism and recreation development consultancy, Tourism Resource Consultants, on a range of large and small development and advisory projects. This work included ecotourism development planning in Samoa, for potential World Heritage Sites in the Solomon Islands for the Ministry of Foreign Affairs and Trade, event management (multisport and mountain biking), and domestic reserve, tourism and recreation management planning.
- 1.8 Between 1995 and 1997, I worked for Boffa Miskell Limited in Christchurch, focusing on recreation planning for local authorities and tourism development planning for private agencies.
- 1.9 Since 1997, I have worked independently. Most of my work is for private companies, local and central government, and environmental and community agencies. I have completed more than 500 consultancy projects nationally and have presented evidence at more than 100 resource management hearings, more than half of which have been for the Environment Court or Environmental Protection Authority. I have completed recreation and tourism research and planning projects for almost 30 local and regional councils.
- 1.10 My most directly relevant past experience to the Proposal includes recreation assessments for other projects with heavy traffic components – such as: the Graymont limestone quarry

expansion near Te Kuiti, which I am currently working on; the reconsenting of the Simcox Quarry Ltd's Barracks Road quarry in Marlborough (2020); Fulton Hogan's Templeton aggregate quarry expansion (2014); Buller Coal's and Bathurst Resources' developments on the Denniston Plateau (from 2012 to now); Fonterra's milk factory proposals in Darfield and Studholme (2010 and 2014); and road and cycleway developments, including: Waka Kotahi's proposed shared path from Ngauranga to Petone in Wellington, and the Hutt City Council's proposed shared path from Seaview to Eastbourne (both 2020); and for the Waka Kotahi: Northern Corridor improvements (Auckland 2017); Petone Interchange (2016); State Highway 3 improvements at Mt Messenger (Taranaki, 2017); and the additional Waitemata Harbour crossing project (2017); and for Auckland Transport, the Redoubt-Mill Road Corridor improvements (2014). In 2016 I prepared a management plan for the Tasman Great Taste Trail for the Tasman District Council ("TDC"), and in 2015 I developed the Tasman District Reserves General Policies and in 2014 the Tasman District Open Space Strategy. I am also familiar with the Wairoa River from my work on the recreation effects of the Upper Lee River Waimea Water Augmentation ("Waimea Dam") proposal in 2013.

Code of Conduct

1.11 I have read and the Environment Court's Code of Conduct for Expert Witnesses 2014, and I agree to comply with it. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Involvement in the project

1.12 I was engaged by the Applicant in August 2021. I undertook a site visit on 2 September 2021.

1.13 In preparing this evidence I have read the following documents:

- (a) The Application and Assessment of Environmental Effects (collectively the "Application")
- (b) The evidence of:
 - (i) Mr Gary Clark for traffic;
 - (ii) Mr Matthew Bronka for noise;

- (iii) Mr Chris Bender for air quality; and
- (iv) Mr Don Morrissey for water quality.
- (c) Submissions to the Proposal.
- (d) Tasman District Council's ("Council") s 42A Recommendation Report.

1.14 I also rely on reference to the *Waimea River Park Management Plan 2010* and other data as referenced in my evidence.

Purpose and scope of evidence

1.15 The purpose of my evidence is to address the recreation effects of the Proposal

1.16 My evidence is structured as follows:

- (a) Description of site and surrounding environment (Section 3)
- (b) Direction in relevant planning instruments relating to recreation effects (Section 4)
- (c) Assessment of recreation effects of the Proposal (Section 5)
- (d) Recommendations to avoid, remedy or mitigate adverse effects (Section 6)
- (e) Comments on issues raised in submissions (Section 7)
- (f) Comment on s 42A Recommendation Report (Section 8)
- (g) Conclusion (Section 9)

1.17 A summary of my evidence is contained in Section 2.

2. SUMMARY

2.1 The Proposal site is within the Waimea River Park , which is administered according to the *Waimea River Park Management Plan 2010* (the "River Plan"). The River Plan contemplates and allows for commercial activity within the Park while capacity for gravel extraction and processing remains. Recreational uses of the area immediate to the Proposal site includes walking, running and cycling. Equestrian access along the true right of the Waimea River within the Park is contemplated once gravel works cease. The true right of the Waimea River within the Park is currently dominated by industrial activity and in my opinion, has very poor amenity for recreation and is currently a rather scruffy area that visitors pass through on the

way to and from more attractive settings, and it certainly has no attraction in itself. I understand that consent has been issued to the Council to remediate the stockpiles of material near the Proposal site, and this will improve the amenity of the setting.

2.2 Trail counter data gathered by the Nelson Tasman Cycle Trail Trust shows a monthly average of 1,200 pedestrians for Pugh Road for the 2020 year, and a monthly average of 4,600 cyclists. Using that cyclist data, and data recorded on the popular social media app Strava, I estimate 64 cyclists per month using the Waimea River Park road on the true right of the Waimea River past the Proposal site (although recent Fulton Hogan activity at Appleby will have substantially reduced this), and 100 cyclists per month for Bartlett Road south of Ranzau Road.

2.3 The Proposal includes:

- (a) Removing the existing Downer gravel processing plant currently located on top of the stop bank at the southern end of Bartlett Road;
- (b) Reinstating the stop bank and providing for walking and cycling access to it;
- (c) The construction and operation of an asphalt plant on the eastern side of the reinstated stop bank, and noise bund on the eastern side of Bartlett Road;
- (d) Truck movements on local roads linking the Asphalt Plant to SH6 and SH60; and
- (e) Site rehabilitation at plant closure.

2.4 Effects of interest for recreation amenity include noise, air quality, traffic, public access and site rehabilitation at site closure. The Asphalt Plant is proposed for closure within 20 years or – if it occurs earlier – when other gravel processing works within the Waimea River Park ceases.

2.5 Noise effects are considered in the evidence of Mr Bronka who finds that recreational visitors to the application area would experience noise levels that are ‘comfortably bearable’ within close proximity to the Asphalt Plant (less than 75m), and that the Sports Youth Fishing Club use of the fishing ponds, at a closest distance of 800m, from the Plant will not be adversely affected, with the Plant being “occasionally faintly audible”. Air quality effects are considered in the evidence of Mr Bender who finds that all emissions are within acceptable limits. Water quality effects are considered by Dr Morrissey who finds negligible

effects on ground and surface water. Traffic effects are considered in the evidence of Mr Clark who finds that the risk level of the local roads will not change with the projected increase in truck movements. My conclusion for these four issues is therefore that their effects on recreation amenity will be less than minor at Waimea River Park generally, although I refer to a localised minor effect on recreation amenity as a result of vehicle movements on the southern end of Bartlett Road, and the likelihood that visitors to the southern end of Bartlett Road are unlikely to linger in the general area due to localised noise effects (although there are no recreation destinations proximate to the Proposal site, and it is an area where visitors pass through only).

- 2.6 Access and site rehabilitation are considered in the *Draft Waimea River Park Restoration and Access Plan for Consultation and Consent Hearing*¹. This proposes maintaining safe walking and cycle access around the Proposal site while it is in operation, and redevelopment of the site on closure of the Asphalt Plant to an agreed standard with a focus on recreation amenity.
- 2.7 My finding is in accord with that of Council's s 42A Recommendation Report; that the Proposal will have no more than minor effects on recreation amenity at Waimea River Park.

3. DESCRIPTION OF PROPOSAL SITE AND SURROUNDING AREA

- 3.1 The site is within land owned by the TDC and administered as part of the Waimea River Park in accordance with the River Plan. My **Attachment 1** shows extent of the Waimea River Park and the location of the Proposal site on its boundary at the southern end of Bartletts Road. The Park includes an area of almost 400ha and spanning a distance of almost 8km along the Wairoa River from near the Waimea Estuary to 1km north of Brightwater. The River Plan identifies that TDC's management priority for the Park is river control and soil conservation, but that other values can be provided for, including nature conservation, historic and cultural values, public access and recreation, and commercial activities. I discuss the River Plan in my following chapter on relevant planning instruments.
- 3.2 The River Plan identifies that there is little information about early recreational use of the Park but that it has (pp11-12):

"... presumably been long used for picnicking, swimming, fishing, walking, game-bird hunting and other informal recreational activities. Nowadays it provides a relatively large area of semi-natural country within an otherwise intensively

¹ Attached to Ms Bayley's evidence.

developed and closely-settled area. The presence of a wide range of other highly natural recreation settings close by in the Tasman District has probably limited the popularity of the Waimea River. Nevertheless, the area provides good opportunities and considerable potential for both informal and organised recreation.

“Walking is one of the most popular recreational activities. Vehicle tracks, the recently developed Two Rivers Walkway along the lower Wairoa and Wai-iti rivers, the Waimea River Walkway and the river bed itself provide good opportunities for walking. The formed tracks also provide opportunities for cycling and driving (vehicle use), though are not in good enough condition to provide a useful alternative to nearby roads for through traffic. The roads and river bed are also used for horse-riding and off-road vehicle use.

“The berm lands, especially the undeveloped parts, provide opportunities for hunting pheasant, California quail and other game birds. This area provides the best pheasant hunting resource in the region and one of the best in the South Island. Game bird hunting and associated activities are popular though largely seasonal uses of the berm lands. Nelson/Marlborough Fish and Game Council has enhanced habitat for game birds on some parts of the berm lands. The area is one of the few accessible areas of public land close to Nelson that is available for hunting.

“Swimming, fishing and boating are also popular uses of the Waimea River. There are usually good pools for swimming in the Waimea River near Appleby Bridge and in the lower Wairoa River. The river is popular for fishing, largely because it is so close to Nelson and Richmond. Trout fishing occurs throughout; white-baiting and mullet fishing occur in the lower reaches. Boating activities are restricted by the low river flows at most times of the year and the river is not as popular as some other nearby rivers. Sections of the river have been occasionally modified to create opportunities for organised jet-sprinting events.

“Informal recreational use of the berm lands is largely unmanaged. Apart from at developed sites, such as Appleby Bridge and the walkways, recreation management consists primarily of enabling access along existing roads and removing dumped rubbish. Removal of domestic rubbish, car bodies and occasionally commercial waste, is undertaken weekly and costs Council

approximately \$50,000 each year. Vehicle use has caused considerable damage to parts of the area, such as recent damage at the picnic area at Appleby Bridge.”

3.3 The jet sprint course is periodically and temporarily developed upstream of SH60 well downstream of the Proposal area. Fish & Game’s enhancement works are focused at Challies Island on the true left of the Waimea River where gravel extraction pits have been repurposed and developed as ponds for birds and stocked with trout (the latter popular for junior fishing).

3.4 The River Plan also notes (section 5.6):

“The primary objectives of park management are river control and soil conservation. Achievement of these objectives requires creation and maintenance of river control structures such as stop banks and ongoing management of the riverbed. Heavy machinery is used for these activities and for other activities, such as extraction and transporting of gravel from and through the park and adjoining lands. To enable these activities to continue, it may be necessary to close or restrict access to parts of the park at certain times.”

3.5 The immediate surrounds of the Proposal site at the southern end of Bartlett Road, including the existing Downer plant and the area between it and the Waimea River (I refer to this as the “application area”), is dominated by the unused Downer gravel processing plant on the stop bank, fly tipping, stockpiles of mixed hardfill, and the river-side road used by heavy trucks associated with gravel extraction and processing. At the time of my site visit, the river-side road was closed to public access due to truck movements for gravel extraction from the surrounding area. The immediate application area, in my opinion, has very poor amenity for recreation and is at present a rather scruffy area that walkers, runners, cyclists and other visitors pass through on the way to and from more attractive settings, and it certainly has no attraction in itself. The true right of the Waimea River within the Waimea River Park is dominated by the quarry road between the northern and southern extents of the quarry works within the Park. The stop bank on the true right of the River does not provide continuous access, and a walkway is provided on the true left.

3.6 Consent has been issued to the Council to remediate the stockpiles of material near and within the application area, and this will improve the amenity values of this setting. However, it will not alter the gravel processing works on the eastern side of the Waimea River generally.

- 3.7 There is no quantification of the various recreational uses of the Park, but Strava data give an indication of the relative levels of activity within and near the Park for cycling and running. In my opinion these two activities will dominate the recreational use of the Park near the Proposal site.
- 3.8 Strava is a social media application which uses GPS records from subscribers' smartphones and other devices uploaded to a central database, allowing speed and time comparisons with other cyclists, runners, kayakers and swimmers (for example), and the monitoring of individual activity or training targets. While the service is popular with professional athletes, its membership is dominated by casual recreation participants. Strava indicated that it had 50 million international users in early 2020 (80% outside the US) with an additional million joining per month.
- 3.9 Comparisons between different forms of data gathering show a degree of reliability for Strava data with a range of 1% to 12% of users recorded on-site that are connected to the service; and this is growing.² Such response rates would compare favourably to an on-site intercept survey of users in an outdoor setting, particularly since Strava data are collected over all seasons and all day (an intercept survey would normally only cover relatively short time periods and be confined to specific interception points). Calibrations on mountain bike tracks in Nelson that I have carried out for other recent projects – by comparing track counter data with Strava records – suggest levels of uptake for Strava of between 20% and 50% of riders, with the lower figure at the entrance to Codgers Mountain Bike Park and the larger figure at the more remote setting of Third House. There is also a track counter for the Great Taste Trail on Pugh Road near the application area, and comparing Strava data with the counter outputs suggest that approximately 20% of cyclists record their activity on Strava at this point. Nevertheless, caution needs to be applied to the use of Strava data as they show participation by only Strava members. There will be an inherent bias to the more competitive and tech-savvy, and some data accumulate from users staying logged in when they are doing other activities, such as driving. Some records are also offset by tens of metres due to either poor GPS reception or map projection errors. However, most records appear in their correct locations.
- 3.10 Strava's greatest strength is in showing the relative value of settings for different forms of recreation. In my experience, if an area is publicly accessible, it will appear on the Strava

² Herrero, J. 2016. *Using big data to understand trail use: three Strava tools*. TRAFx Research See also <https://medium.com/strava-metro/cdc-finds-strava-metro-data-correlates-strongly-with-census-active-commuting-data-8ab1be0fe130>

heatmap. Running data on Strava is a good proxy for walking (runners tend to use and avoid the same locations as do walkers).

- 3.11 Heatmaps indicate the cumulative activity of Strava subscribers in any setting. The brighter the colour (the closer to white), the more activity there. **Figure 1** in my **Attachment 2** shows a relatively high level of cycling activity on the Great Taste Trail (with its alignment indicated in Figure 1) on Pugh Road and reasonably high levels of activity on the roads on the Waimea Plains generally, but relatively little on the true right of the Waimea River downstream of Pugh Road and on the southern end of Bartlett Road.
- 3.12 **Figure 2** shows Strava data for running for the same area, showing the popularity of the Great Taste Trail and the Two Rivers Walkway north of Brightwater.
- 3.13 **Figure 3** shows a more detailed image of Strava records for cycling at the application area, and **Figure 4** shows the same area for running. These indicate cyclists using both Bartlett Road and the river-side road, but runners preferring Bartlett Road.
- 3.14 Cyclists using the Great Taste Trail rely on the off-road formation of the Trail on Pugh and Ranzau Roads, and the shared path on an old railway corridor leading from Ranzau Road north towards Richmond. The Nelson Tasman Cycle Trail Trust operates a cyclist and pedestrian counter on Pugh Road, as well as many other sites on the Great Taste Trail. Data provided to me by the Trust shows a monthly average of 1,200 pedestrians for Pugh Road for the 2020 year, and a monthly average of 4,600 cyclists. By comparing Strava data with the counter data for cyclists, it appears that approximately 14% of cyclists passing the Pugh Road counter record their activity on the Strava ap. There are no user count records for Bartlett Road on Strava (which requires a Strava user to have established a 'segment' for a section of road within Strava to compare personal results with other users), but there are for Swamp Road to the north. If we assume that 14% of cyclists on Swamp Road are also using Strava, then we get an estimate of 4,000 cyclists on Swamp Road for 2021, or 333 cyclists per month (just over 7% of the activity on the Great Taste Trail at Pugh Road). This appears reasonable considering the status of the Great Taste Trail compared with Swamp Road.
- 3.15 There is a cycling segment on Strava for the Waimea River south bank (river right) from the Great Taste Trail to Blackbyre Road, immediately west of the Proposal site. If 14% of cyclists here are using Strava, then a pro-rata estimate of 762 cyclists per annum results, or 64 per month.

- 3.16 My **Figure 1** suggests a slightly higher level of cycling activity on Bartlett Road between the Appleby Highway and Ranzau Road compared with Swamp Road, but a relatively low level of use of Bartlett Road south of Ranzau Road. I offer an estimate of 400 cyclists per month on Bartlett Road between the Appleby Highway and Ranzau Road, and 100 cyclists per month for Bartlett Road south of Ranzau Road.
- 3.17 The same calculations cannot be performed for pedestrians relying on Strava. However, 20% of use of the Great Taste Trail at Pugh Road is by pedestrians, which might imply 25 recreational walkers per month for Bartlett Road south of Ranzau Road.

4. DIRECTION IN RELEVANT PLANNING INSTRUMENTS

- 4.1 In this section I note provisions of the planning instruments that are relevant to my assessment of effects of the Asphalt Plant.
- 4.2 I understand that the Proposal is for the current disused Downer crusher plant – which spans the stop bank at the application area – to be removed and the asphalt plant to be built and operated on the eastern side of the reinstated stop bank.
- 4.3 Chapter 27 of the Tasman Resource Management Plan (“TRMP”) relates to activities in the beds and on the surface of rivers and lakes and refers to the maintenance, and where appropriate the enhancement of public access to river and lakes (section 27.6.2). Chapter 8 refers to maintaining and enhancing public access to and along the margins of rivers which are of recreational value to the public. Associated policies provide for adverse effects on public access to be avoided, remedied or mitigated. The TRMP defines the bed of a river to be “the space of land which the waters of the river cover at its fullest flow without overtopping its banks” (section 2.2) so the Asphalt Plant will not be within the river bed as defined.
- 4.4 Section 14.4 of the TRMP refers to “Activities and facilities that have the potential to cause significant adverse effects on reserves, open space and surrounding areas.” (section 1.4.1) with the objective (14.4.2) “The avoidance of significant adverse effects of activities and facilities on open space and recreational areas, and on the amenity values of surrounding areas.” Policies include: (14.4.3.1) “To control the scale, extent and location of buildings and structures to ensure the open space character of reserves is maintained.”
- 4.5 The Proposal site is on the southern end of Bartlett Road, which provides access to the Waimea River Park (along with several other locations, as shown in the Strava heatmaps),

and is within the Waimea River Park. The Park is largely zoned Rural 1 within the TRMP (not Open Space), with some components Rural 2, and the Proposal site is fully within the Rural 1 zone.

- 4.6 The Waimea River Park, including access within it, is managed and developed according to the River Plan. As discussed, this places priority on managing the Park for river control and soil conservation, but that other values can be provided for, including nature conservation, historic and cultural values, public access and recreation, and commercial activities. I have discussed the recreational uses managed for above. The objective for “Public Access and Recreational Use” as stated by the River Plan is to (section 4.4):

“Manage the riverbed and berm lands to provide opportunities for public access and recreational use in a way that such activities do not conflict with one another or with adjacent landowners and are compatible with river control and soil conservation (Objective 1) and other objectives.”

- 4.7 The River Plan also refers to objectives for commercial activities, noting (section 4.5):

“The main commercial uses of the river bed and berm lands have been livestock grazing, extraction of gravel, processing of gravel and rock (from the river and other sources) in crushing plants and commercial recreation. A significant proportion of the berm land is leased for commercial uses, mostly grazing. Lease rents provide revenue to Council.

“Commercial use provides for effective management of parts of the berm lands and provides useful revenue for park management (e.g. soil conservation and flood protection). However, some commercial activities, such as gravel processing, may conflict with other uses of the park.”

- 4.8 The objective for “Commercial Use” is to (section 4.5):

“Manage the riverbed and berm lands to provide opportunities for commercial use providing such use is compatible with river control and soil conservation (Objective 1), beneficial to park management and does not conflict with other management objectives.”

- 4.9 The River Plan notes (section 10.1):

“Gravel is still being extracted from the berm lands, though opportunities for further gravel extraction are finite. Three gravel-processing plants are present in

the park, all on the east side of the river between Bartlett Road and the Coastal Highway (Appleby Bridge). These plants process gravel from local sources and sources elsewhere in the District. Gravel extraction and processing are authorized through lease agreements.

“Gravel extraction can be managed so that it is compatible, and even beneficial, to river control. It can also assist with the restoration of wildlife habitat, such as at Challies Island, and the contouring and shaping of the berm lands for other uses. However, gravel processing plants are largely incompatible with river control objectives and other objectives for park management. The presence of large processing plants within the stop banks may obstruct the river floodway, increase heavy vehicle traffic, disturb wildlife and conflict with public access and recreational use. The presence of large stockpiles of gravel within the stop banks is also incompatible with river control objectives.”

4.10 With reference to gravel processing plants the River Plan states as policies:

“119. Discuss with gravel processing plant operators, prior to lease renewal, possible relocation from the park.

“120. Work with gravel processing plant operators to minimise the adverse effects of the plants on other park values and activities.”

4.11 With reference to managing leases, the River Plan states (section 10.4):

“The lease agreement allows Council to terminate a lease if the land is required for river control purposes or public recreation.

“128. Ensure that actual and potential natural values, including wildlife and habitats, and other potential uses of the land are considered before renewing leases or issuing new leases.

“129. Include restrictions as part of new or renewed leases so as to meet the objectives of this management plan.

“130. Ensure that all new or renewed leases include provision for Council to terminate the lease, either in whole or part, if the land is required for planned park development.

“131. Review the terms and conditions of grazing leases when they are due for renewal to ensure they are compatible with objectives and policies of this plan.”

4.12 The River Plan identifies that five “key park access points, with car parks and other facilities, are proposed at” (section 9.2):

- Clover Road West;
- Lower Queen Street;
- Waimea West Road (Wai-iti River Bridge);
- Challies Road;
- Coastal Highway (Appleby Bridge, both sides of Waimea River) -

and that “other access points, with no proposed developments (primarily for pedestrian/cycle access), are proposed at” seven locations, including Bartlett Road. There is an access point at Bartlett Road as described by the River Plan.

4.13 Walkway developments to and within the Park are recommended by the River Plan (section 9.1), and focus on its western side and north of SH6. There are no stated access proposals for the eastern side of the Park between the Great Taste Trail bridge and SH6, apart from the general policy of permitting (p26), “public foot access to all other parts of the park, except areas that are clearly fenced or otherwise defined for grazing or other commercial uses.” However, section 9.4 on horse riding notes an objective to “Provide a horse-riding trail along the east side of the river between Clover Road West and Appleby Bridge” with parking facilities at either end.

5. ASSESSMENT OF EFFECTS

5.1 The Proposal includes:

- (a) Removing the existing Downer gravel processing plant currently located on top of the stop bank at the southern end of Bartlett Road;
- (b) Reinstating the stop bank and providing for walking and cycling access to it;
- (c) The construction and operation of an asphalt plant on the eastern side of the reinstated stop bank, and noise bund on the eastern side of Bartlett Road. In response to the s 42A Recommendation Report and submissions it is now

proposed that the Asphalt Plant operate 7am-6.30pm Monday – Saturday and 7am-6pm Sunday with truck movements being restricted to this timeframe as well. It is also proposed that 30 times a year the Asphalt Plant is able to operate until 9pm Monday – Friday with truck movements until 10pm, or on a Saturday still operate 7am-6pm but have truck movements until 10pm;

- (d) Truck movements on local roads linking the asphalt plant to SH6 and SH60. Truck movements are proposed to be limited to 80 movements per day; and
- (e) Site rehabilitation at plant closure.

Stop bank reinstatement

5.2 The stop bank in the immediate application area is occupied by the disused Downer plant. Reinstating the stop bank will allow for public access along its crest for a short distance as fencing across the stop bank north approximately 600m north of the site currently prevents pedestrian access along its full length. The repaired stop bank will provide a visual barrier to the Asphalt Plant from within the river corridor and is an enhancement for access. My **Figure 5** shows the location of the proposed 4m access to be provided adjacent to the Asphalt Plant leading from Bartlett Road to the stop bank. This will enable park visitors using Bartlett Road to avoid vehicle activity associated with the Plant.

5.3 However, access options along the true right of the Waimea River are defined by continuing gravel extraction and processing in the wider area. I understand that Fulton Hogan has recently installed a silt press at their crushing site adjacent to the Appleby Bridge preventing recreational access at this point. This will have far more effect on recreation amenity than the Asphalt Plant due to its exclusion of activity from large areas on the eastern side of the Waimea River.

Construction and operation of the proposed Asphalt Plant

5.4 The Plant is proposed to be developed on the eastern side of the stop bank and outside the river corridor, and will form part of the road environment at the southern end of Bartlett Road. Cyclists, walkers and runners will pass the plant as they leave the Waimea River Park and enter the working rural environment of the Waimea Plains, or vice versa. In terms of effects on the Waimea River Park, the existence of the plant will be experienced by recreational users as they pass the industrial activity. However, the scale of effect is inevitably minor, particularly considering:

- (a) the existing dominant use of the eastern side of the Park for gravel extraction and processing;
- (b) the proposed construction of legible public access adjacent to the Asphalt Plant, taking visitors from Bartlett Road to the top of the stop bank;
- (c) that these effects will only continue for the life of the Asphalt Plant; and
- (d) the focus of recreation development and access on the western side of the Park.

5.5 Paragraph 5.47 of the Application's AEE notes that:

"The Applicant volunteers traffic within the Waimea River Park Reserve will operate as if the main entrance into the Reserve is a continuation of Bartlett Road in relation to road rules for giving way, turning and speed restrictions."

5.6 Considering the recreational traffic on Bartlett Road identified in my Figures 3 and 4, there is the potential for conflict between walkers, cyclists and runners at the southern end of Bartlett Road and I make a recommendation to avoid this effect in my following section.

5.7 The applicant has volunteered in the proposed consent conditions that when other gravel extraction and processing works cease within the Waimea River Park, they will also cease operations (or within 20 years, whichever comes first). This will remove any effects of the Proposal when the eastern side of the Park becomes fully available for recreation development. In the meantime, it will contribute lease income to the TDC for Park development.

5.8 I attempted to view the application area and the existing processing plant from the Great Taste Trail. It cannot be seen unaided from the Trail bridge across the Wairoa River. (I was able to locate the existing plant using a 2000m camera lens, which can also be used for taking excellent photos of the moon). I cannot locate any other setting on the Great Taste Trail where the existing plant is visible. Visual and other amenity effects of operation of the Asphalt Plant (not considering traffic movements) will therefore be local to the immediate application area.

Truck movements on local roads linking the asphalt plant to SH6 and SH60

5.9 Traffic effects have been assessed by Gary Clark of Traffic Concepts via his report attached to the Application and by his response to Council's Section 92 request for further

information. Mr Clark identifies that the number of truck trips associated with the asphalt plant will be low at a maximum of 4 per hour (8 movements) with typical operations likely to see fewer movements than this, with most outward movements on Ranzau Road to SH6 and most inward movements via Pugh Road to SH60, depending, however, on the destination. Mr Clark notes that the Great Taste Trail is on a separated cycle facility on Ranzau Road within a 60km/hr zone and that the road has excellent sight lines, and that potential effects are therefore less than minor.

5.10 I note that the distance along Ranzau Road where the Great Taste Trail and truck movements will coincide is approximately 1200m. A walker on this stretch will cover that distance at a speed of 5km/hr in less than 15 minutes and will therefore have the potential to experience, on average, two truck movements at a maximum activity level of 8 truck movements per hour (faster cyclists will have a high chance of seeing one or no trucks, and assuming that all truck movements are on Ranzau Road). This is a less than minor effect on a road used locally by, for example, Supreme Lumbers Sawmill almost immediately opposite the northern turn-off for the Great Taste Trail on Ranzau Road, and by Fertilizer New Zealand located just east of the Pugh and Ranzau Road intersection. Mr Clark notes in his evidence the minor cumulative effect of additional traffic from the Asphalt Plant. The length of Bartlett Road from its southern end to Ranzau Road west is also approximately 1200m, and so encounter rates will be the same for users of that route (two trucks encountered over a 15 minute journey for a walker).

5.11 In my opinion, truck movements on the road network will have only minor adverse effects on recreation as a result of increased interactions with heavy vehicles.

6. RECOMMENDATIONS TO AVOID, REMEDY OR MITIGATE ADVERSE EFFECTS

6.1 The applicant has submitted a *Draft Waimea River Park Restoration and Access Plan for Consultation and Consent Hearing* (30 Nov 2021). This proposes mitigations to the main issues of interest for me, which are maintaining public access adjacent to the Proposal Site during operation and the rehabilitation of the site post-operations.

6.2 A 4m access lane is proposed on Bartlett Road to the stopbank to enable the public to safely access the Waimea River Park. Post operations, the site is proposed to be restored in consultation with TDC, with vehicle access controls to be installed to prevent cars from using the stopbank, but allowing pedestrians and cyclists.

6.3 These methods, in addition to those proposed to manage heavy traffic as discussed in the evidence of Mr Clarke will maintain effects on amenity at the minor level.

7. ISSUES RAISED IN SUBMISSIONS

7.1 I summarise the issues relevant to recreation raised by submitters in my Table 1 below.

Table 1: Submission summary for recreation issues			
#	Submitter	Position	Issues raised regarding recreation
12	Tasman District Gun Dog Society	Conditional support	Must be on the eastern side of the stop bank. Public access to river and berms will remain. Cameras will deter “hoons” and illegal dumping.
14	Chris and Sarah Gray	Opposed	Traffic movements on narrow local roads. Development in contradiction to Waimea River Park Management Plan. Will shut off access to the Park via Bartlett Road.
16	Luke Tapper	Opposed	Impacts on Great Taste Trail cycle route.
17	Wayne Hunt	Support	Removal of derelict plant an improvement. Surveillance will reduce illegal dumping.
18	Jason Oswell	Support	Removing plant when gravel extraction ends is a sensible compromise for recreation.
21	Aage Melis	Oppose	Negative effects on Waimea River Park. Traffic effects.
24	Ian and Diane Boote	Oppose	Location will stop access to the Waimea River Park at the site. Traffic effects.
26	MG Group Holdings Ltd	Oppose	Not complementary to the Waimea River Park.
27	Philip Clements	Oppose	Traffic effects.
29	Kyle Victor and Sarah Jane Turner	Oppose	Traffic effects. General concerns about Waimea River Park.
31	Penny Sue and Chris Franklin	Oppose	Effects on Waimea River Park recreation values.
33	Marion Georgiev	Oppose	Effects on Waimea River Park. Bartlett Road has seen an increase in walking and cycling “since the quarry activities have ceased.” The proposed site is “surrounded by landscape developments and recreational areas.” River access would cease from Bartlett Road and further recreational development at the area would halt. Effects on proposed bridle path development on eastern side of the Park. Effects of contaminants on users of the Park.

34	Andreas Georgiev	Oppose	Effects on Waimea River Park (walking, cycling, dog exercising, horse riding etc) from emissions and heavy traffic.
37	Bob and Val Chittenden	Oppose	Conflict with Waimea River Park. Traffic effects (although not specific to recreation).
44	Adrian and Melanie Terry	Oppose	Effects on cycle trail on Ranzau Road. Shared trail too narrow at busy times and cyclists use the road. Traffic movements overstated (“500+ extra trucks a day”).
46	Debbra Dixon	Oppose	Conflict with the Waimea River Park. “Lack of access to river.”
47	Edens Road Fruit Ltd	Oppose	Not complementary to the Waimea River Park.
48	JS Ewers Ltd	Oppose	Not complementary to the Waimea River Park.
49	Blackbyre Horticulture Ltd	Oppose	Not complementary to the Waimea River Park.
50	Boysenberries New Zealand Ltd	Oppose	Not complementary to the Waimea River Park.
52	Kirsten Watt	Oppose	Conflict with Waimea River Park. Heavy traffic in area (although not specific to recreation).
54	Rob Lane and Anissa Bain	Oppose	Amenity effects.
57	Regan Gray	Oppose	Obstructing access to the Waimea River Park. Heavy traffic effects on cycleways and walkways.
58	Darrin Canton	Support	Improved access to stop bank with derelict plant removal. Maintenance of access on Bartlett Road. Plant removal when gravel extraction ceases is good. Recommends that a traffic management plan is prepared to ensure safe access to the Waimea River is maintained for walkers, cyclists and motor vehicles.
61	David Cartwright	Oppose	Impacts on Waimea River Park. Walking and cycling on Bartlett Road has increased since gravel processing facility closed. Proposed plant and heavy traffic will curtail these activities for residents and visitors. Limited space on Bartlett Road for trucks and other users. When gravel is exhausted, it is expected that remaining processing facilities will be removed.
65	Gail Barth	Oppose	Contrary to Waimea River Park Management Plan. Severe impacts on walkers and cyclists accesses Park from Bartlett Road via hazards caused by air pollution, noise, dust and traffic.

			Increase in recreational patronage of Bartlett Road since closure of existing gravel processing plant.
69	David Teece	Oppose	Impacts on local access to the Waimea River due to vehicle movements, noise, dust and other contaminants and safety impacts from increased traffic.
71	Sport Fishing for Youth Trust	Oppose	Effects on Challies Road access area to fishing ponds in “very close proximity” to the application site. Proposal will deter development of activities “compatible” to fishing ponds nearby. Noise and odour effects on “quiet relaxing nature” of fishing ponds.

7.2 I address each issue below.

Human health effects and noise

7.3 Mr Bender has assessed air quality effects of the proposal on human health and concluded a less than minor effect from dust raised by plant operations and discharges from the hot mix plant.

7.4 Mr Bronka has assessed noise effects on users of the River Park and finds that the Sports Youth Fishing Club use of the fishing ponds at a closest distance of 800m from the Plant will not be adversely affected, with it being “occasionally faintly audible”. There will be localised noise effects from operation of the Plant and truck activities, and while Mr Bronka describes these as “comfortably bearable” while visitors pass the site, they are likely to dissuade visitors from lingering in the area.

Contrary to Waimea River Park Management Plan

7.5 As I have discussed, the River Plan contemplates and allows for commercial activities within the Park, with specific reference to gravel extraction and processing. While it notes a preference from submitters to the draft Plan that the Park be fully developed for recreation, the River Plan concludes that there is benefit from the lease income from commercial activities to Park development. The River Plan foresees gravel extraction and processing within the Park ceasing when the resource is exhausted, and includes appropriate policies to minimise the adverse effects of gravel processing while it still occurs, as I have discussed in paragraph 4.6 of my evidence. The River Plan does not seek to exclude gravel extraction and processing immediately or at some specified time.

Scale of effects on users of Waimea River Park

- 7.6 As I have discussed, the Asphalt Plant is proposed to be located on the eastern side of the stop bank and will form part of the Bartlett Road road setting, rather than being part of the riparian environment within the stop banks. As such, it will have a sense of removal from the main recreation corridor within the Park, but will dominate the Bartlett Road access site. Clearly, the rehabilitation of the site – as proposed in the Restoration and Access Plan – sooner rather than later will bring forward enhancement of recreation amenity at the Proposal site, but while other gravel extraction and processing continues within the Park, the gain in amenity will not be significant. I understand that with or without the Asphalt Plant as proposed, Bartlett Road and the haul road between SH60 and Bartlett Road within the Waimea River Park will continue to be used by heavy trucks associated with existing gravel extraction and processing.
- 7.7 By locating the activity outside the stop bank area, the proposal significantly reduces the potential scale of effects on Park users.

Loss of access at Bartlett Road

- 7.8 Access at Bartlett Road for cyclists, walkers and vehicles will remain with the Asphalt Plant in operation, as per the proposed Restoration and Access Plan. The Proposal also now includes clarifying public access adjacent to the Plant via the access route to its east.
- 7.9 I also note that Bartlett Road is a secondary access point to the Waimea River Park, and is not identified in the River Plan as suitable for further development, as discussed in my paragraphs 4.12 and 4.13.

Traffic effects

- 7.10 Several submitters have noted an increase in patronage by cyclists and walkers at Bartlett Road since the closure of the Downer gravel processing plant. I have no data on changes in recreational patronage of the road over time, and the Great Taste Trail counter on Pugh Road has only been in place since late 2018 and shows a reasonably stable trend over that time. However, I note that the Waimea River suspension bridge which enables the Great Taste Trail in the area opened in January 2013, and this will have been the greatest driver in change in walking and cycling activity between then and now on all local roads.
- 7.11 Traffic effects are otherwise assessed by Mr Clark, as I have discussed in earlier in my evidence. Mr Clark finds that there are excellent sight lines on the straight rural roads and that existing levels of risk exposure will remain with the additional truck movements.

Effects on equestrian activities

7.12 The River Plan refers to the intent to “Provide a horse-riding trail along the east side of the river between Clover Road West and Appleby Bridge.” (section 94, policy 78). I understand from a conversation with Beryl Wilkes – TDC’s Reserves and Facilities Manager – that the construction of the equestrian trail will be dependent on the cessation of gravel extraction and processing within the Park. The Asphalt Plant is proposed to be removed when other gravel works within the Park end, and will therefore not impede the horse-riding trail development.

8. ISSUES RAISED IN S 42A RECOMMENDATION REPORT

8.1 The s 42A Recommendation Report does not identify any significant issues relating to recreation or amenity from the Proposal; and considers noise, visual effects, air quality, cumulative effects on the Waimea River Park, and traffic. In relation to traffic, the s 42A Recommendation Report notes that while, “truck movements on the local roads will have a noticeable amenity effect, which is considered to be at least minor for some residents on these routes, but the adverse effects will vary depending on location.” (para 9.25). There is no specific finding in the Report on amenity effects on recreational use of the local roads – although the Great Taste Trail on Ranzau Road is referred to at paragraph 9.17 – but the Truck Routes Plan is “accepted as a rational approach to minimise traffic safety risks.” (para 9.25).

9. CONCLUSION

9.1 My evidence considers the effects of the Proposal on recreation amenity. The effects of most interest are those caused by the location of an industrial activity within the Waimea River Park, and public access in the immediate vicinity, and heavy traffic effects on walkers and cyclists on local roads.

9.2 The continuance of other gravel processing activities in the Waimea River Park mean that the net effect of the Proposal will not be significant until that other activity ceases, and the value for recreation of the true right of the Waimea River can be fully realised. In the meantime, effects of the Proposal are minimised via provisions for public access around the Asphalt Plant during the operational phase, traffic management provisions, localised noise effects and low air discharge emissions, no effects on water-quality and, ultimately, site rehabilitation.

Rob Greenaway

10 December 2021

Attachment 1: Waimea River Park (Waimea River Park Management Plan 2010) showing application site

Waimea River Park



Waimea Berm - Title ref 281547 & 282676



Attachment 2: Strava heatmaps

Figure 1: Strava heatmap for **cycling**, 24 months of cumulative data to August 2021, showing location of Tasman Great Taste Trail (adjacent to the dotted green line).

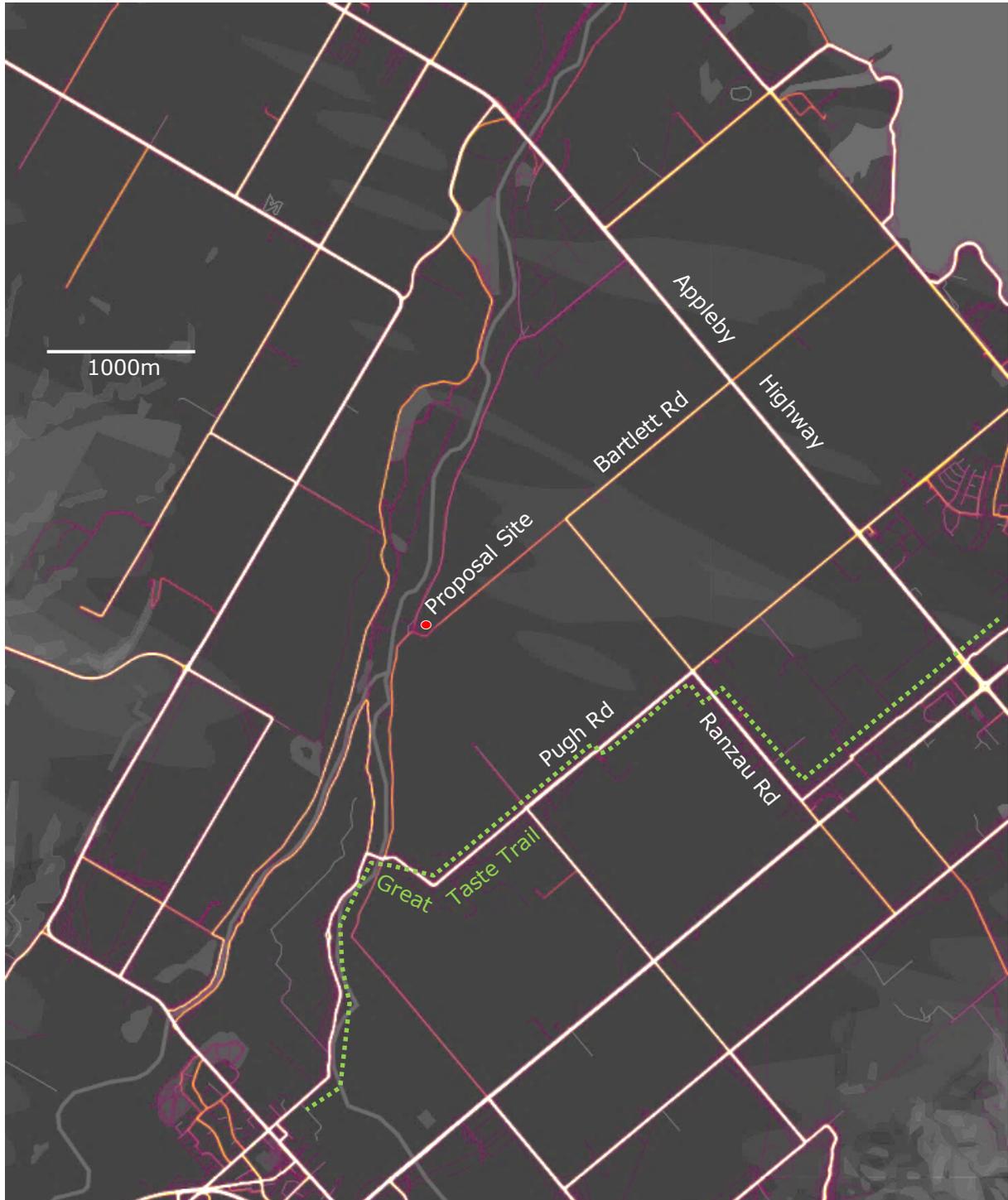


Figure 2: Strava heatmap for **running**, 24 months of cumulative data to August 2021, showing location of Tasman Great Taste Trail (adjacent to the dotted green line).

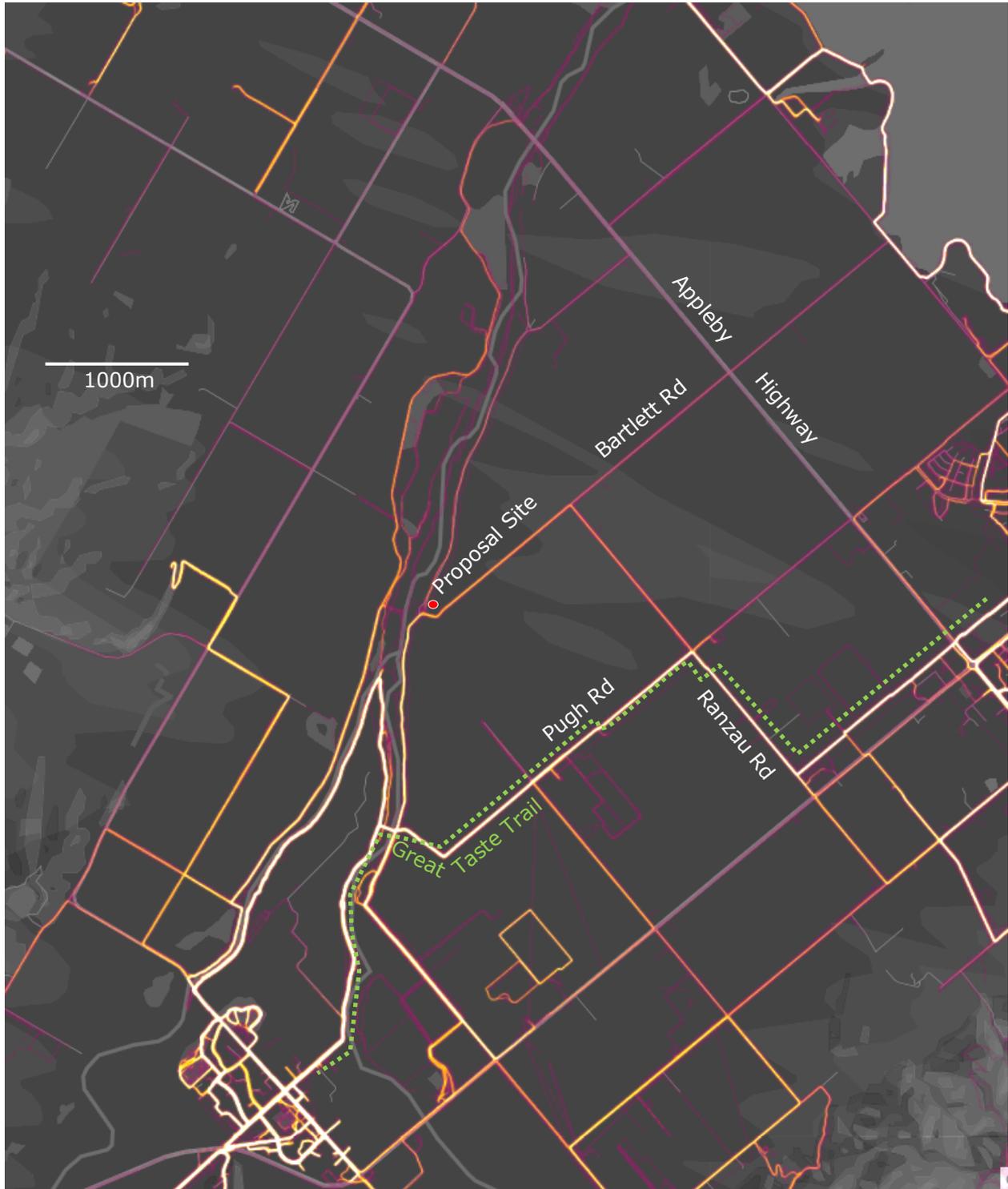


Figure 3: Strava heatmap for **cycling**, 24 months of cumulative data to August 2021, at application site.



Figure 4: Strava heatmap for **running**, 24 months of cumulative data to August 2021, at application site.



Figure 5: Proposed 4m public access route location in yellow. Detail from graphics provided in the evidence of Ms Bayley.

