

15 February 2024

Rebecca Clarkson
Principal Advisor
Aquaculture Direct
[REDACTED]

Dear Rebecca

**Re: APP145770: Mussel Spat Nursery & Harvesting Farms, Raglan
Natural Character, Landscape/Seascape & Visual Effects Assessment
Further Information**

I refer to the above assessment prepared by Wayfinder in December 2023, and understand that you have received a request for further information from Waikato Regional Council. Please find our responses below:

Waikato Regional Seascape Study – Boffa Miskell June 2023

I note that this document is not widely published in the public domain and required some searching to find it. The report was prepared by Boffa Miskell and appears within the set of referenced documents related to the s32 report for the proposed Waikato Regional Coastal Plan.

The purpose of the Seascape Study is to augment previous work undertaken to identify terrestrial and coastal values (against which we assessed potential effects in our original assessment). The study was prepared following consideration of Policy 15 of the New Zealand Coastal Policy Statement in order to “*inform projects and establish the landscape baseline against which to assess effects of proposed development on seascape character*”.

Proposed farming sites A, B and C are located in the “*Area D – Waikato North*” section of the study, and farming site D is located in the “*Area E – Whaaingarua (Raglan Harbour), Aotea and Kaawhia Harbour*” section.

Section 4.4.5 outlines the key characteristics of Area D, which are very much aligned to the characteristics outlined in the former Boffa Miskell Report, “*Natural Character Study of the Waikato Coastal Environment*” (dated 2016). These include references to the high energy coastline, dynamic sedimentation, limited settlement, sparse coastal vegetation, and sense of remoteness. These also align with the values assessed in our original report (with particular reference to Page 11). In this regard, I do not consider that the Seascape Study introduces any additional values not already considered in our assessment, and as such I remain of the opinion that the effects of proposed Sites A, B & C on seascape values (as further reinforced by the Seascape Study) will be **low**.

Section 4.5.5 outlines the key characteristics of Area E. Again, these values are very much aligned with the characteristics outlined in the 2016 Natural Character Study, noting in particular the minimal level of human modification along the coast, the long-range vistas along the coastline, and the significance of the surf breaks. These also align with the values for this area assessed in our original report (with particular reference to the table on Page 17),

and I do not consider that they add any additional values not already considered. On this basis, I remain of the opinion that the effects of proposed Site D on seascape values (as further reinforced by the Seascape Study) will be *low*.

Further Assessment Against Waikato Regional Coastal Plan

Our assessment provides a detailed but holistic assessment of the proposal against the policies of the Waikato Regional Coastal Plan (WRCP) and the Proposed Waikato Regional Coastal Plan (PWRCP). Please find below a more specific assessment against the relevant policies:

WRCP

Objective	Policies	Assessment
3.1 – Preservation of the natural character of the coastal environment by: ▶ Protecting it from inappropriate subdivision, use and development; and ▶ Restoring it where appropriate	3.1.2 – Protection of other natural features	The proposed activity largely sits within the water and requires only minimal impact to the benthic natural environment. There is no impact on any other natural features.
	3.1.3 – Remote and isolated areas	The presence of buoys could be considered a human activity or modification. However, the proposed farms retain a sense of remoteness. They do not contain platforms or buildings, and they are tended infrequently. For the most part they are set and left to their own devices – much as the stock are within the landscape. Equally, by its very nature, there are few people around to experience this remoteness. As identified, most recreational and commercial boats head due west from Manu Bay or Raglan Harbour, avoiding the Site Areas. There are also very few land-based viewing locations where the proposals will be openly visible, and visibility on sea is also equally limited. Therefore, the proposal will have very limited effects on the feeling of remoteness and isolation.



PWRCP

	3.1.4A – Use and occupation of coastal space	The scale of buoys on the surface of the water is very small, and only visible from short distances away. The vast expanse of the seascape still dominates. Therefore, the use and occupation of the coastal space will be barely perceived, and it is considered effects of this use on natural character will be <i>low</i> .
3.3 – Amenity and heritage values within the CMA maintained or enhanced	3.3.1 – Amenity Values	Amenity values derive primarily from the perceptual values in the seascape/landscape. The majority of these values are unaffected by the proposal, it will retain its high energy and the bold landforms against the coast will remain dominant. There will be a slight impact on the feeling of remoteness and how such feelings contribute to overall amenity, but this is limited by the generally low visibility of the proposals. Therefore, it is considered effects on amenity values will be <i>low</i> .
NATC-01 – Preserve natural character – the natural character of the coastal marine area is preserved by protecting it from inappropriate use and development.	NATC-P1 – Avoid adverse effects of activities on the values and characteristics identified in Schedule 4 that contribute to the natural values of areas of outstanding natural character	This has been detailed in our original report and is summarised in each of the conclusions, with particular reference to effects on remoteness and isolation and very limited (if any) effects on other characteristics such as the high energy coastline, the expressive bold cliff faces, the black sand beaches, the littoral cells. Some effects on the darkness of the night sky are noted in our assessment, detailed in a section starting on Page 19.
	NATC-P2 – Avoid significant adverse effects of activities on the values and characteristics that contribute to natural character, and avoid, remedy or mitigate other adverse effects on	Our assessment considers that there are no significant adverse effects on the values and characteristics of the seascape/landscape. A <i>low</i> level of effects will be experienced on



	natural character, in all areas of the CMA that are not areas of outstanding natural character.	remoteness values and impacts on the darkness of the night sky.
	NATC-P3 – Transient or minor adverse effects on the values and characteristics that contribute to outstanding natural character may be acceptable	I note that we have identified that there may be a <i>low</i> or minor adverse effect on the remoteness of the seascape location and darkness of the night sky values.
NATC-02 – Restore natural character - Restore or rehabilitate the natural character of the coastal environment where appropriate.	NATC-P4 – Promote the restoration or rehabilitation of natural character values and characteristics of the coastal environment, particularly in relation to estuaries, coastal indigenous vegetation and habitats, ecological corridors, improving coastal water quality and reducing the adverse effects of sediment on sensitive coastal receiving environments.	I note that mussel farming (and thus mussel nursery activities) have been shown to provide positive ecosystem services and can contribute to restoration of natural character. Our overall assessment is that the effects of the proposal on natural character will be <i>low</i> .
NFL-01 – Protect natural features and landscapes	NFL-P1 – Avoid adverse effects of activities on the values and characteristics identified in Schedule 3 that contribute to outstanding natural features and landscapes in the coastal marine area.	Please refer to the table in our original assessment (Page 17) and the commentary that follows this table.
	NFL-P2 – Avoid the significant adverse effects of activities on the values and characteristics that contribute to natural features and landscapes, and avoid, remedy or mitigate other adverse effects on natural features and landscapes, in all areas of the CMA that are not outstanding natural features and landscapes.	Our assessment considers that there are no significant adverse effects on the values and characteristics of the seascape/landscape. A <i>low</i> level of effects will be experienced on remoteness values and impacts on the darkness of the night sky.
	NFL-P3 – Recognise that transient or minor adverse effects on the values and characteristics that contribute to	I note that we have identified that there may be a <i>low</i> or minor adverse effect on the remoteness of the



	outstanding natural features and landscapes may be acceptable.	seascape location and darkness of the night sky values.
	NFL-P4 – Protect the significant geopreservation sites identified in Schedule 3A by: 1. Avoiding significant adverse effects of use and development on significant geological features 2. Avoiding, remedying or mitigating other adverse effects of activities on significant geological features.	The proposal will have no impact on any geopreservation sites or features.
	NFL-P5 – Maintain or enhance qualities and characteristics of areas and features valued for their contribution to public amenity, with particular regard given to: 1. Avoiding a sense of encroachment or domination of built form along the coastal edge 2. Avoiding forms and location of development that effectively privatise the coastal edge 3. Recognising the contribution that open space makes to amenity values 4. Recognising that some areas derive their particular character and amenity value from existing structures, modifications or activities 5. Managing land use to address potential adverse effects of climate change induced weather variability and sea level rise on amenity 6. Encouraging design of new structures and development to enhance existing amenity values	I note that we have identified that there may be a <i>low</i> or minor adverse effect on the remoteness and darkness of the night sky values. The proposal does not include any built forms on the coastal edge and does not privatise the landscape, and the extent of the farm areas in the wider seascape is very small such that any privatisation effects are negligible. Amenity values derive primarily from the perceptual values in the seascape/landscape. The majority of these values are unaffected by the proposal, it will retain its high energy and the bold landforms against the coast will remain dominant. There will be a slight impact on the feeling of remoteness and how such feelings contribute to overall amenity, but this is limited by the generally low visibility of the proposals. Therefore, it is considered effects on amenity values will be <i>low</i>.



Effects of Site Area D on the ONL

Due to the scale of buoys and the distance from the coast, Site D will be almost impossible to see from any land area, including the Te Toke Gorge Lookout, inhabited locations and Ruapuke Beach. This is clearly demonstrated by the visualisations which show that beyond 2km the buoys are insignificant in the view. We note on Page 18 of our assessment that even a small boat located 3km offshore was invisible from the lookout area.

The most likely visual appearance of the farm is a dark patch (we described it in our report as a “small dark scratch”) on a very expansive outward view.

Interestingly, although the ONL status elevates the significance of the landscape values in this particular area, including its remoteness, I found that both the landscape and seascape had a reduced sense of remoteness south of Raglan than experienced to the north. This was notable in the ease of access (particularly resulting from distance) to the various coastal lookouts, and the increased presence of dwellings (particularly around Ruapuke Beach). Although our assessment was taken mid-week, early in the morning, there was other human activity on and around the beach, and increased vehicle presence in this area compared to the more distant roads closer to Pukerewa Marae. Boat activity was also more evident, with fishing boats heading due west from Raglan Harbour visible from some lookout locations. In this context, the built form of the road, tracks and lookout platforms all contributed to a landscape containing a degree of modification.

But, at the same time, the experiential value of travelling along this coast was heightened by the dramatic cliff faces and coastal edge – the values identified in the Boffa Miskell work. The interplay between the bold coastal landform, the crashing of the waves and presence of sea-spray in the air embody the coastal experience.

On this basis, we consider that the experiential effects of the proposal on the ONL will be, at most, *low*. This is because the proposal site is 5km distant from the key aspects of the landscape that contribute to its value. People experiencing this landscape do so by being right in it, focussed on the immediate surroundings – and I consider it unlikely this experience will be diminished by a distant activity in the sea.

I am not certain how to further expand on the effects of the perimeter lighting on the dark sky environment beyond the assessment already provided. We have noted in our report that the farms will likely diminish the sense of remoteness at night – the lights more strongly indicating human activity. But the lights will be very unlikely to have any impact on the visible night sky or the legibility of the various constellations – such visibility is much more likely to be impacted by light sources much closer to the viewer.

There is, perhaps, a potential for a star setting to the west to be lost if it happened to directly align with the angle of the farm from the viewer, but I consider such a likelihood to be very small and would be for a small fraction of time (and assumes the star light isn't lost to typical light refraction at the horizon).

Suitability of the Wider Landscape for the Proposed Zone

We have undertaken a detailed assessment of the proposal area. This included a comprehensive water-based assessment of each proposed location, and then an extensive traverse of the coastal landscape from where views might be anticipated. A key part of this work was familiarising ourselves with the landscape and seascape characteristics and values, particularly those captured in the Boffa Miskell reports. We have also considered the likely visibility of the proposal from various distances.

Our findings from this work are set out in our report and in the additional information provided above. Our conclusions, which I continue to support, are that the effects of the proposal are at the *low* end of the scale. Primarily this is because



the proposal is very small in comparison to the expansiveness of the seascape around it, and set a significant distance off-shore. As a result, there are essentially no effects on the key coastal characteristics – such as the high energy coast, dominance of the cliff faces and the physical makeup of the beaches and coastal landscape.

I reiterate that there will be an effect on the perceptual remoteness values of the seascape. The buoys introduce human activity to the area. But given the very limited visibility, this can only really be experienced while in a boat near to the proposal sites – which by its very definition is an infrequent occurrence.

Finally, in considering overall suitability its important to not overlook what the activity is and where it needs to be located. The mussel resource is in this area – the farms cannot be located on land, or in other locations where there is no spat. The location of the activity is defined by the resource.

In this regard, I consider the wider landscape is appropriately suited for this type of proposal. It connects with the resource, is small scale, and will largely be non-perceptible. However, including a rule that ensures consideration of landscape/seascape matters in any future resource consent process is recommended, with particular consideration of the combined scale of development.

Rebecca, I trust the above provides the additional information that has been requested. Should you require anything further, please do not hesitate to get in touch. I can also be available to caucus with the Council experts if this would be helpful.

Yours sincerely

Shannon Bray
Registered Fellow Landscape Architect