PROJECT MEMORANDUM

mansergh graham
LANDSCAPE ARCHITECTS

Project:	**Northwestern Mussels Ltd – West Coast Spat Farm**	**Memo:** 2/R2	**Page:** 1 of 14
Application	APP145770		
Topic:	Review of the *Natural Character, Landscape/Seascape, & Visual Effects Assessment* (NCLSVEA), prepared by Wayfinder Limited for the applicant.		
Date:	8 May 2024		
Attention:	Christin Atchinson – Principal Consents Advisor. Waikato Regional Council		
From:	Dave Mansergh		

INTRODUCTION

Northwestern Mussels Ltd (NWML) is applying for consent for a new 700-hectare spat catching and nursery farm, in four separate blocks, on the Waikato west coast, in areas of the Tasman Sea in the west coast of the Waikato region, at least 3.1 km from the coastline, and generally between Papanui Point in the south and Parikotuku Point in the north.

This document has been prepared as part of an analysis of the content and adequacy of information relating to landscape, natural character, and visual amenity effects identified in the *Natural Character, Landscape/Seascape, & Visual Effects Assessment* (NCLSVEA), prepared by Wayfinder Limited for the applicant.

This document has been prepared within the context of the requirements of the Resource Management Act 1991 (RMA), The New Zealand Coastal Policy Statement 2010, the Waikato Regional Policy Statement (WRPS), The Waikato Regional Coastal Plan, the Proposed Waikato Regional Coastal Plan and the Waikato District Plan (Decisions Version).

A review of the application documentation (including the NCLSVEA and the further information provided) has found that it contains sufficient information to allow the nature of the proposal and the effects associated with the proposed plan change and consent application on landscape (including visual) and natural character values to be generally understood. An inspection of the application sites has been undertaken from the water and some land-based locations.

SITE LOCATION & CONTEXT

The location of each application site is shown in the Figure 1 below:

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Figure 1: Proposed spat and nursery site locations (A-D).

BRIEF

The Waikato Regional Council has engaged Mansergh Graham Landscape Architects Ltd to peer review the landscape, natural character and visual assessments report included in the application, and report on the suitability of the information contained within the application in terms of:

a. If the assessment has been undertaken in a manner consistent with the recommendations of Te Tangi a te Manu -The Aotearoa New Zealand Landscape Assessment Guidelines and that the contents and findings are sufficiently detailed to allow a peer reviewer to independently confirm the findings of the report without additional analysis or information.
b. If it contains sufficient information to enable an analysis against the relevant landscape, natural character and amenity provisions contained in the New Zealand Coastal Policy Statement 2010 (NZCPS), The Regional Policy Statement (RPS), The Operative Regional Coastal Plan (ORCP) and the Proposed Regional Coastal Plan (PRCP).
c. If the report contains sufficient information to allow an affected person to be identified for notification purposes.

SITE INSPECTION

A site inspection (marine) was undertaken on 4 December 2023. Inspection of the land-based view locations to the south was undertaken on 24 January 2024. Due to the distance of the road from the northern sites, and the limited viewing opportunities, the land-based view locations in the north were not inspected.

Purpose and Approach

This document has been prepared as part of an analysis of the content and adequacy of information relating to landscape (including visual amenity) and natural character effects identified within the resource consent application and assessment of environmental effects (AEE).

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Documents Reviewed

Relevant sections (Landscape, natural character, and visual amenity) of the following documents have been reviewed:

a. *Natural Character, Landscape/Seascape, & Visual Effects Assessment. Mussel Spat Nursery*. 12 December 2023. Wayfinder Landscape Planning & Strategy ("**NCLSVEA**")
b. Landscape & Visual Effects Assessment Maps & Photographs. Raglan Spat Nursery. 19 December 2023. Wayfinder Landscape Planning & Strategy ("**supporting graphics**")
c. *APP145770: Mussel Spat Nursery & Harvesting Farms, Raglan Natural Character, Landscape/Seascape & Visual Effects Assessment Further Information.* 15 February 2024. Wayfinder Landscape Planning & Strategy ("**RFI response**")

Other documents read to provide background information and context:

a. *Resource Consent Application to accompany the concurrent Private Plan Change Request for mussel spat catching/nursery space in West Coast Waikato.* May 2023. Aquaculture Direct. ("**the AEE**")
b. *North Western Mussels Limited Spat Nursery Application – Updated Landscape and Natural Character Assessment* – April 2024. Aquiculture Direct.
c. *Planning Assessment – Updated April 2024.* Aquaculture Direct.

Approach

This review was carried out within the context of the requirements of the RMA, the findings, and recommendations of *Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines* (*Te Tangi a te Manu*) and the Quality Planning website. The following factors have been considered:

a. If the assessment methodology used is consistent with the current accepted ("best practice") approach to landscape, natural character and visual assessment and has been applied consistently.
b. If the values and attributes of the existing landscape have been described in enough detail to convey a clear understanding of the existing landscape, and amenity baseline against which the assessment is undertaken. This should include any differences that exist between the existing physical environment, the consented environment, and the permitted baseline (where applicable).
c. If the proposal has been described in enough detail to convey how it will alter the existing landscape, natural character, and visual amenity.
d. If the effects of the proposal on the landscape (including its visual amenity) have been described and rated consistently and any relevant issues are identified.
e. The accuracy and usefulness of any attached plans, maps, graphics, and visualisations.
f. If the relevant statutory matters and provisions have been identified and addressed in sufficient detail.
g. The extent to which any proposed mitigation approach avoids, remedies and/or mitigates any unacceptable adverse effects on the landscape, natural character, and visual amenity values within an acceptable time frame.
h. If the conclusions and recommendations are supported by the analysis within the assessment.

This review is limited to determining whether the currently accepted approach to landscape, visual and natural character assessment has been followed by determining if it is likely that another experienced landscape architect would reach the same or similar conclusions, by applying the same methodologies given the information presented within the report. *Te Tangi a te Manu* states:

> *A peer review is a focused appraisal of the principal assessment, not a parallel assessment.*

The structure and style of the NCLSVEA is not assessed.

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REVIEW OF THE APPLICANT'S LANDSCAPE & VISUAL ASSESSMENT

Methodology

Te Tangi a te Manu states:

> *While landscape assessment methods vary, they are all based on landscape character and values. Character is an expression of the landscape's collective attributes. Values are the reasons a landscape is valued. Values, though, are embodied in attributes. Effects are consequences for a landscape's values resulting from changes to attributes. The landscape's values are managed through managing such attributes.*[1]

A combination of the review of background information to identify key landscape features and attributes; relevant planning documents; and site investigations/observations have been used to identify the existing landscape/seascape context and assess the effects of the proposed marine farm extension on landscape/seascape, natural character and visual amenity.

In my opinion, the assessment approach followed is generally consistent with the recommendation contained within *Te Tangi a te Manu.*

Effects Ratings

The NCLSVEA uses the following seven-point scale for the rating of effects, consistent with the recommendations of the *Te Tangi a te Manu*. The "less than minor", "minor, and "more than minor" thresholds used by the RMA, and the "significant" threshold used within the NZCPS are identified.

<table>
<tr><td>This Assessment</td><td>Very-Low</td><td>Low</td><td>Low-Mod</td><td>Moderate</td><td>Mod-High</td><td>High</td><td>Very-High</td></tr>
<tr><td rowspan="2">RMA</td><td colspan="2">Less than Minor</td><td colspan="2">Minor</td><td colspan="3">More than Minor</td></tr>
<tr><td colspan="5"></td><td colspan="2">Significant</td></tr>
</table>

Figure 2: Wayfinder Effect Rating Table.

Identification of the Existing Site and Surrounding Landscape and Natural Character Context

Landscape

The NCLSVEA/RFI Response collectively identifies the location of the site and describes the surrounding terrestrial landscape context in terms of its topographical features, land cover and development patterns and assesses existing landscape character and values in terms of their physical, associative, perceptual and te Ao Maori attributes and values (in line with the suggested approach contained in *Te Tangi a te Manu - Aotearoa New Zealand Landscape Assessment Guidelines)*.

The landscape context describes the setting of four proposed sites off the west coast of Waikato, New Zealand. Sites A, B, and C are situated north of Raglan Harbour, between Ngātutura Point and Te Hara Point, with Site A

[1] Page 105. Te Tangi a te Manu - Aotearoa New Zealand Landscape Assessment Guidelines

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being approximately 5km offshore and Sites B and C about 3.5km offshore. Site D is located to the south of Raglan Harbour, around 5km west of Papanui Point.

The area north of Raglan features a predominantly modified, rolling rural landscape with large pastoral farmlands and sparse population, especially noticeable along the coastal Te Akau Coast Road, which is characterised by its exposure to western coastal winds and the stunted growth of trees. Despite the modifications, remnant and regenerating native bush can be found within the hinterland, where sheep and cattle grazing are prevalent. Access to this remote area is limited, mostly via winding, gravel roads, and public coast access is almost non-existent, with minimal private access due to steep bluffs. A small number of buildings and the Pukerewa Marae are notable within this landscape, offering limited accommodation and services.

The landforms between Sites A, B, and C create a bold backdrop to the seascape, with pastoral activities being visually prominent even from offshore. However, details of the landscape and its geomorphological processes, such as erosion, are more discernible from closer distances.

To the south, Mt Karioi, a conical ancient volcano covered in native bush and managed by the Department of Conservation, dominates the landscape. It offers challenging tramping tracks and significant natural beauty. The surrounding areas, including Whaanga Road and Ruapuke Beach, present a mix of native vegetation, pastoral land use, and residential developments, with public access to the beach and views characteristic of the West Coast's surf and marine activities.

Raglan is recognised globally for its surfing spots, notably Manu Bay, and its weather significantly shapes the experience of the area. Recreational and commercial fishing are common, with most activity focusing on deeper waters offshore. There is no marine farming near the proposed sites, except for research sites and a spat-catching mussel farm further south (Aotea Harbour) and oyster farm in Kawhia Harbour.

The Te Uku wind farm, visible from the Waikato area but not from the sites, and the minimal night-time lighting in most coastal areas, contrasting with the more illuminated settlement of Raglan and its surroundings, further define the landscape context.

The NCLSVEA /RFI Response does not discuss the landscape values and attributes of Kawera Island/Gannet Rock, a small island to the southwest of Site D. Kawera Island is a remnant of a volcanic tuff ring located Tuft and while relatively small, is visible from the Te Toke Gorse carpark and lookout area, forming a backdrop to Site D.

<u>Waikato Regional Seascape Study - June 2023</u>
The s92 response reviews the Waikato Regional Seascape Study, prepared by Boffa Miskell in June 2023, and identifies that it aims to augment previous work done to identify terrestrial and coastal values to assess the potential effects of the proposed development on seascape character.

The study focuses on two areas: Area D - Waikato North and Area E - Whaaingaroa (Raglan Harbour), Aotea and Kaawhia Harbour (Not to be confused with Area A – D identified in the application and NCLSVEA).

In Area D (in which the proposed sites A, B and C are located), the key characteristics include a high-energy coastline, dynamic sedimentation, limited settlement, sparse coastal vegetation, and a sense of remoteness. These characteristics align with the values assessed in the original report. The Seascape Study does not introduce any additional values not already considered, and the effects of proposed Sites A, B, and C on seascape values are expected to be low.

In Area E (in which the proposed site D is located), the key characteristics also align with the values outlined in the 2016 Natural Character Study. These include minimal human modification along the coast, long-range

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vistas, and the significance of surf breaks. The Seascape Study does not add any additional values not already considered, and the effects of proposed Site D on seascape values are expected to be low.

Overall, the Seascape Study reinforces the values and characteristics already assessed in the original report and does not introduce any new information. The effects of the proposed farming sites on seascape values are expected to be low in both Seascape Study Area D and Area E.

Natural Character

The analysis of natural character focuses on abiotic, biotic, and experiential values within the surrounding landscape and seascape. The extent of the study area is not defined.

The primary interaction between the proposal and the abiotic environment involves the anchoring mechanisms for the buoys, situated approximately 20m below sea level. These anchors, designed to be removable, are expected to have a negligible effect on the seabed structure. The possibility of non-organic material reaching the benthic layer is identified as minimal, and, subject to further assessments[2], any localised alterations to wave patterns by the floating buoys are considered insignificant when compared to the vast ocean environment. Consequently, the effect on abiotic natural character values is deemed ***very low***.

The proposal aims to catch wild mussel spat and on-grow the spat for eventual transfer to mussel-growing farms. Although removing spat could theoretically affect the food chain, the NCLSVEA identifies that no significant effects have been observed from similar ventures, nor have interactions with other sea creatures, such as Maui dolphins, been recorded. The report identifies that mussel farms might have a positive influence on biotic systems. Interaction with seabirds is expected to be minimal, as the farms do not produce food that attracts birds, though they may use the buoys for resting. Thus, the effect on biotic natural character values is also considered very low.

The main effect of the proposed marine farm on natural character values is identified as effects on the perception of the wild, high-energy coastal environment, characterised by distinctive landforms and beaches. Although the farms will introduce a built element to the seascape, their visibility from shore is reported to be limited, mainly affecting those who experience it from on the water from within 2-3km. The low density of development and pastoral land use within the adjacent terrestrial landscape is identified as contributing to the isolated characteristic of the receiving environment. The infrequent tending of the proposed marine farms is assessed as being unlikely to alter the sense of isolation significantly, as the area is not heavily trafficked by boats. Therefore, the experiential impact on natural character values is assessed as low, with the farms introducing a minor degree of modification noticeable mainly to those in proximity (i.e. on the water).

Identification of the Main Elements of the Proposal

The proposal outlines the establishment of four mussel spat catching and nursery farms and harvesting areas off the coast, as detailed in the Assessment of Environmental Effects (AEE) and revised in the Section 32 Evaluation Report by Mitchell Daysh. These areas are designed to catch and cultivate mussel spat, with specifics as follows:

a. Area A: Located approximately 4km from the coast, measuring 2,000m x 1,500m, and comprising three sets of lines.
b. Area B: Situated about 3km from the coast, with the same dimensions as Area A and also containing three sets of lines.
c. Area C: Like Area B in size and distance from the coast and features three sets of lines.
d. Area D: Positioned approximately 3.5km from the coast, this area is 2,500m x 1,200m and includes

[2] Further information had been sort by the Council about the effect on the surf breaks.

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two sets of lines, with one set being only 1,500m in length.

The sets of lines are a sequence of buoys anchored at both ends in the seabed. The visible length above the surface varies, with the "catching rope" suspended about 2m below the surface for the mussel spat to attach. The buoys, primarily black except for the orange end buoys for navigational compliance, and perimeter lights (yellow, flashing 5 times every 20 seconds to be visible from at least 2 nautical miles) are designed to meet Maritime New Zealand's guidelines.

The proposal indicates minimal human intervention with the farms, stating they will be largely untended except for 3-4 visits per month for maintenance and harvesting, likely conducted from Raglan Harbour using barges.

Landscape Effects Assessment

The landscape effects section of the report concludes that the proposed mussel spat catching, nursery and harvesting activities will have minimal effects on the landscape. The farms will introduce modified, built forms into the seascape, but they will be located several kilometres from the coast and will not have any physical impacts on the landforms or coastline. The farms will be visible from elevated locations on the land, but the visual effects will be very low, if any, as the farms will appear as indiscernible buoys in the distance. The proposal will have no effects on the high-energy coastline, or the natural character values associated with the landscape.

The NCLSVEA states:

> *It will introduce modified, "built" form into the seascape environment. This manifests through the presence of the straight rows of buoys, set out in grid formats, spread across four Site Areas. Such a layout is not random or natural, it is a clear taming and management of a system to achieve a productive, useful outcome for people. However, it is not rigid and it will move around to some degree with the wave patterns. As identified earlier, from visible locations at sea level, it's unlikely that from distances greater than approximately 1-1.5km that the whole farm within a Site Area will ever be visible – it will bend and twist with the swell.*[3]

Overall, the landscape effects of the proposal are assessed as ***low*** in the NCLSVEA. The assessment is based on a detailed methodology that follows best practice guidelines and considers the existing context and key natural character values. The visual effects of the proposal are assessed as ***very low***, except for an increase in visual effects at night-time due to the presence of lighting.

Effects on Natural Character

The natural character section of the report assesses the potential effects of the proposed mussel spat catching, nursery and harvesting activities on the natural character of the coastal environment. The assessment considers the abiotic, biotic, and experiential values of the landscape and seascape, as well as the potential effects on these values.

Abiotic Effects:

a. The proposal will have minimal effects on the abiotic values of the coastal environment.
b. The anchoring mechanisms at the end of the buoys will have a negligible impact on the seabed.
c. The floating buoys may create some localized changes to wave patterns, but these effects will be minimal and not impact the high-energy surf breaks.

[3] Page 16. NCLSVEA

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Biotic Effects:

a. The removal of wild mussel spats through the proposed activities will have a biotic effect, but the scale is insignificant within the extent of the coastline.
b. There are no known effects on other sea creatures, such as Maui dolphins, and the proposal is not expected to attract birds or have significant impacts on the biotic systems.

Experiential Effects:

a. The proposal will introduce a degree of modification to the seascape, but the extent of human activity associated with the proposal is minimal.
b. The farms will not significantly impact the wild, high-energy coastline or the legibility of the landforms.
c. The presence of the farms may slightly diminish the feeling of remoteness, but this will mainly be experienced by people near the Site Areas.

Overall, the natural character effects of the proposal are assessed as ***low***. The proposal will introduce a degree of modification to the seascape, but the extent of human activity associated with the proposal is minimal. The proposal will have ***very low*** effects on the benthic environment and ***no effect*** on the high-energy coastline. The effects on the natural character values of the Waikato Kairoi Outstanding Natural Landscape are also assessed as low.

Further, the response to the request for further information identifies that the effects of farm site D on the Outstanding Natural Landscape (ONL) are expected to be ***low*** for the following reasons:

Distance and visibility: The proposed site for the mussel farms in Area D is located 5km away from the key aspects of the landscape that contribute to its value. The visualizations provided in the assessment demonstrate that the buoys will be almost impossible to see from any land area, including lookout points, inhabited locations, and Ruapuke Beach. The buoys will appear as a dark patch on the expansive outward view, but they will not dominate or encroach upon the landscape.

Experiential value: The landscape in Area D is characterized by dramatic cliff faces, the crashing of waves, and the presence of sea spray in the air. These elements contribute to the coastal experience and the values identified in the Boffa Miskell work. People experiencing this landscape do so by being right in it and focusing on the immediate surroundings. The distant activity of the mussel farms in the sea is unlikely to diminish this experience.

Reduced sense of remoteness: The assessment notes that the sense of remoteness in the landscape south of Raglan is reduced compared to the north. This is due to factors such as ease of access to coastal lookouts, increased presence of dwellings around Ruapuke Beach, and human activity on and around the beach. However, the proposal site is still sufficiently distant from these key aspects of the landscape, and the overall feeling of remoteness is not significantly affected.

Perimeter lighting: The assessment acknowledges that the perimeter lighting of the farms may diminish the sense of remoteness at night by indicating human activity. However, the lights will have minimal impact on the visible night sky or the legibility of constellations. Any potential loss of a star setting to the west aligning with the angle of the farm is considered unlikely and temporary.

In conclusion, the effects of proposed farm site D on the ONL are expected to be ***low*** due to the distance of the proposed site from key landscape features, the experiential value of the landscape, and the limited visibility of the buoys.

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Effects on Visual Amenity

The visual effects of the proposed mussel spat farms are assessed as ***very low*** in the NCLSVEA. The report identifies that the farms will only be visible from sea level within 2km and elevated land-based locations, they will appear as a cluster of indiscernible buoys, and they will not be visible from shoreline locations or beaches. However, the visual effects assessment appears to focus on locations beyond this distance.

The lights associated with the farms at night will not cause light pollution and will not significantly impact the quality of the night sky. Overall, the visual effects of the proposal during daylight hours and at night are minimal. The proposed farms will introduce an element of modification to the seascape, but this is not dissimilar to the modification of most surrounding landforms for pastoral use. The feeling of remoteness and isolation, which contributes to the visual character, will still be evident within the proposed farms. The farms are not intended to be tendered daily and require relatively minimal input only a few times per month.

The NCLSVEA states:

> *Principally, the lights associated with the farms are unlikely to have any notable impact on the quality of the night sky (this being dependent on weather conditions). The lights will not be bright enough to cause light pollution such that is experienced by street lighting or light spill from residences.*[4]

The night effects section of the NCLSVEA concludes that the visual effects of the proposal at night will be ***low***. The lights associated with the farms are unlikely to have a notable impact on the quality of the night sky and will not cause light pollution. While the presence of the farms and the dynamic nature of the lighting may slightly decrease the sense of remoteness, it is unlikely to be a significant distraction or compete with the wider night sky.

Statutory Context

The NCLSVEA identifies the following statutory documents and provisions as being relevant to the assessment of natural character, landscape/seascape and visual effects:

- New Zealand Coastal Policy Statement (2010) – Policies 1, 6, 13 and 15.
- Waikato Regional Policy Statement (including the Boffa Miskell Report identified in the last section); and
- The Proposed Waikato Regional Coastal Plan.

The application is reviewed against the following planning provisions in either the NCLSVEA or the response to the request for additional information:

DOCUMENT	OBJECTIVE	POLICY
New Zealand Coastal Policy Statement (2010)		Policy 1 Policy 6 Policy 13 Policy 15
Waikato Regional Plan Waikato Regional Policy Statement	The NCLSVEA states: *The proposal does not trigger any policy considerations under the Regional Plan or any Regional policy in regard to landscape/seascape effects. Policies in regard to natural character have been assessed under the NZCPS*[5].	
Operative Waikato Regional Coastal Plan	3.1 – Preservation of the natural character.	3.1.2 – Protection of other natural features. 3.1.3 – Remote and isolated areas. 3.1.4A – Use and occupation of coastal space.
	3.3 – Amenity and heritage values.	3.3.1 – Amenity Values.

[4] Page 19. NCLSVEA
[5] Page 20 NCLSVEA

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Proposed Waikato Regional Coastal Plan	NATC-01 – Preserve natural character. NATC-02 – Restore natural character.	NATC-P1 Outstanding natural character. NATC-P2 Other natural character. NATC-P3 Transient of minor adverse effects on natural character. NATC-P4 Restoration of natural character.
	NFL-O1 Protect Natural Features and Landscapes	NFL-P1 Outstanding natural features and landscapes. NFL-P2 Other natural features and landscapes. NFL-P3 Transient or minor adverse effects on natural features and landscapes. NFL-P4 Significant geopreservation sites. NFL-P5 Public Amenity values.

The s92 response document concludes that the proposal is consistent with the above objectives and policies of the OWRCP and PWRCP. The assessment considers the effects of the proposed marine farms on remoteness and isolation, visibility, and amenity values, and concludes that the effects on these values will be low and therefore ***less than minor***. Additionally, the assessment notes that mussel farming can contribute to the restoration of natural character values and characteristics of the coastal environment.

While the effects on the benthic environment are also identified as being minimal, this is not supported by any analysis within the main body of the report or references to other reports.

The NCLSVEA states:

> *The AEE provides a full breakdown of relevant policy, and it is not intended to repeat this here. Below provides an overview of the key policy relating to this assessment of natural character, landscape/seascape and visual effects.*[6]

Assessment of Suitability of the Wider Landscape for the Proposed Zone

In assessing the suitability of the landscape for the proposed zone the s92 response document draws upon the NCLSVEA to reach the following conclusions:

a. The effects of the proposal on the landscape are at the low end of the scale.
b. The proposal is small in comparison to the expansiveness of the seascape and is set a significant distance offshore, resulting in essentially no effects on key coastal characteristics.
c. There will be a slight impact on the perceptual remoteness values of the seascape, but this can only be experienced while in a boat near the proposal sites, which is infrequent.
d. The wider landscape is appropriately suited for this type of proposal as it connects with the mussel resource, is small-scale, and will largely be non-perceptible.

The s92 response also recommends including a rule to ensure that landscape/seascape considerations are factored into future resource consent processes, especially regarding the combined scale of development.

Conclusions

The document concludes that the proposed mussel spat nursery and harvesting activities will have minimal effects on the natural character, landscape/seascape, and visual aspects of the area, with visual effects being very low during the day and low at night due to lighting. The proposal is not anticipated to significantly affect

[6] Page 11 NCLSVEA

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the abiotic and biotic values of the surrounding environment. While the sense of remoteness and isolation may be slightly diminished, the overall effects on natural character and landscape/seascape values are considered low. The project aligns with the New Zealand Coastal Policy Statement and the Regional Plan, adhering to best practice guidelines, including a thorough site visit and context analysis. The modification of the seascape is noted but deemed comparable to land modifications for pastoral use, and the characteristic feeling of remoteness and isolation will be preserved within the proposed farms.

Supporting Graphics and Illustrations

The maps and photographs section of the report contains the following:

a. A map showing the proposed Site Areas and viewpoint locations.
b. Photographic images provide representative views from each of the viewpoints visited during the assessment.
c. Visualizations of the proposal taken from 500m and 1,000m away from Site D, show the layout of the farm.
d. Other photographs from similar viewpoints as used in the assessment, including imagery from the Mt Karioi Summit Track.
e. Context map providing an overview of the proposed mussel spat farms off the west coast of Waikato, near Raglan.
f. Photographs taken from different locations and angles around the proposed sites, documenting existing conditions and views.
g. Existing photos taken from specific sites, show the current landscape and seascape conditions.
h. Visual simulations demonstrating the proposed mussel farms in their proposed locations.

DISCUSSION AND FINDINGS

Findings of the Review

The analysis of the effects of the proposed rezoning and activity on landscape character (including visual effects) and natural character has been evaluated in a manner generally consistent with the recommendations contained in Te Tangi a te Manu. The assessment of effects is however succinct and primarily evaluates the suitability of the location within the context of the broader surrounding landscape/seascape and visual catchment, including the assessment of effects on the land to the east (the Ta Akau and Karioi coastlines).

The NCLSVEA does not discuss how the introduction of the proposed zoning and activity will affect perceptions of natural character within the context of an environment that is highly natural in appearance and does not contain any other marine farms in detail.

The report however does identify that the main effect will be the experiential values associated with remoteness and visual effect from within 2km. The NCLSVEA states:

> *The farms will introduce a degree of built form into the seascape, potentially diminishing the feeling of remoteness. However, as identified in the previous section, for the most part (and particularly from sea level) the farms are unlikely to be visible from distant locations, and so it is only when a viewer is on the water, within 2-3km, that they will easily experience the presence of the farms.*[7]

[7] Page 14. NCLSVEA

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It's important to note that the assessment concludes that the effects on the landscape/seascape and natural character values will be ***low***, a determination based on the method adopted in the analysis and the weightings given to each analysis factor by the assessor (Wayfinder).

It should also be noted that landscape assessment combines objective and subjective assessment techniques meaning that variation in the weightings assigned to the assessment factors, utilizing different factors, or interpreting the relevant planning provisions differently could lead to the identification of different magnitudes of effect (effect ratings). If such variations arise, potentially through the submissions process, a more comprehensive analysis may be required.

As identified in the NCLSVEA, the visual effects of the proposed marine farms will generally be restricted to within 2km, meaning that they are not likely to be readily visible to the naked eye from near sea level beyond this distance, marine farms can be experienced at distances of greater than 5km from more elevated terrestrial location, with floats appearing as a regular geometric pattern against the sea.

In my opinion, the broad-scale approach taken in the NCLSVEA potentially results in an underreporting of landscape (including visual) within 2km of the application sites, and natural character effects. Within this distance, changes in the characteristics of the various attributes that contribute to the area's existing seascape and natural qualities are likely to become increasingly manifest with proximity and as such the effect ratings may be potentially higher than the levels reported in the NCLSVEA.

I generally concur with the analysis and ratings of effects contained in the NCLSVEA, beyond approximately 2km of each application site.

Precautionary Approach

The New Zealand Coastal Policy Statement 2010 (NZCPS) and the Waikato Regional Coastal Plans (operative and proposed) require a precautionary approach to the consideration of activities in the CMA. The NZCPS and proposed plan require a precautionary approach for activities, whose effects are uncertain, unknown, or little understood but potentially significantly adverse. The operative plan requires a precautionary approach to marine farm development by ensuring marine farm structures avoid adverse effects, if practicable, or otherwise remediate or mitigate effects.

Introducing marine farms into areas currently devoid of such development could change the physical, associative and perceptual qualities and values of the landscape/seascape within 2 km of the sites, and the physical and perceptual qualities and values associated with of the natural character across a broader area. These changes could compromise the intrinsic values protected by the RMA and NZCPS. Adopting a precautionary approach would ensure that any development does not irreversibly affect the natural character and landscape character values, particularly in areas that may not have been subject to ground truthing when the seascape analysis which informed the Proposed Waikato Regional Coastal Plan was undertaken.

While it is unlikely that the proposed marine farms will be visually prominent when experienced from the land or a distance (>2km) from within the CMA, and therefore is only likely to have a small effect on the characteristics of the much larger seascape within which it is contained (a ***low*** magnitude of effect as reported in the NCLSVEA), the potential exists for the marine farms to have a greater effect within a distance of 2 km of each site on the values for which the seascape (ONFL) is considered outstanding, and the wider natural character values of the area.

In my experience, it is not uncommon for landscape architects to agree on the key characteristics and values of an existing landscape and proposed development, while reaching different conclusions around the magnitude of

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effects in their assessment. This is because the assessment of landscape effects (including visual) and the assessment of effects on natural character contains both objective and subjective aspects.

While the purpose of this peer review is to verify that the standard methods for assessing landscape, visual, and natural character have been correctly applied in a report. This is done by evaluating whether another experienced landscape architect would likely arrive at similar conclusions using the same methodologies and information provided. This of course does not preclude alternative conclusions being reached by a third party, who has also followed the recommendations contained within the guidelines but has applied different weightings and emphasis.

It is possible that further information, relevant to the consideration of effects on landscape (including visual) and natural character may arise through submissions, requiring either further information to be sought from the applicant of a more detailed analysis of the various attributes and values of the area to be undertaken.

Given the location and expanse of the proposed zoning and proposed marine farms within, and in particular the location of marine farm Area D which is located within the Marine Mammal Sanctuary and an Outstanding Natural Feature and Landscape, immediately bounded by a Regionally Significant Surf Break to the south and an area of High Natural Character to the northwest and proximal to a Significant Indigenous Biodiversity Area (SIBA-B), as shown in Figure 3 below, a precautionary approach would ensure that the potential for adverse landscape and seascape effects is thoroughly considered and mitigated before any development proceeds and that the implication for potential expansion and cumulative effects are considered.

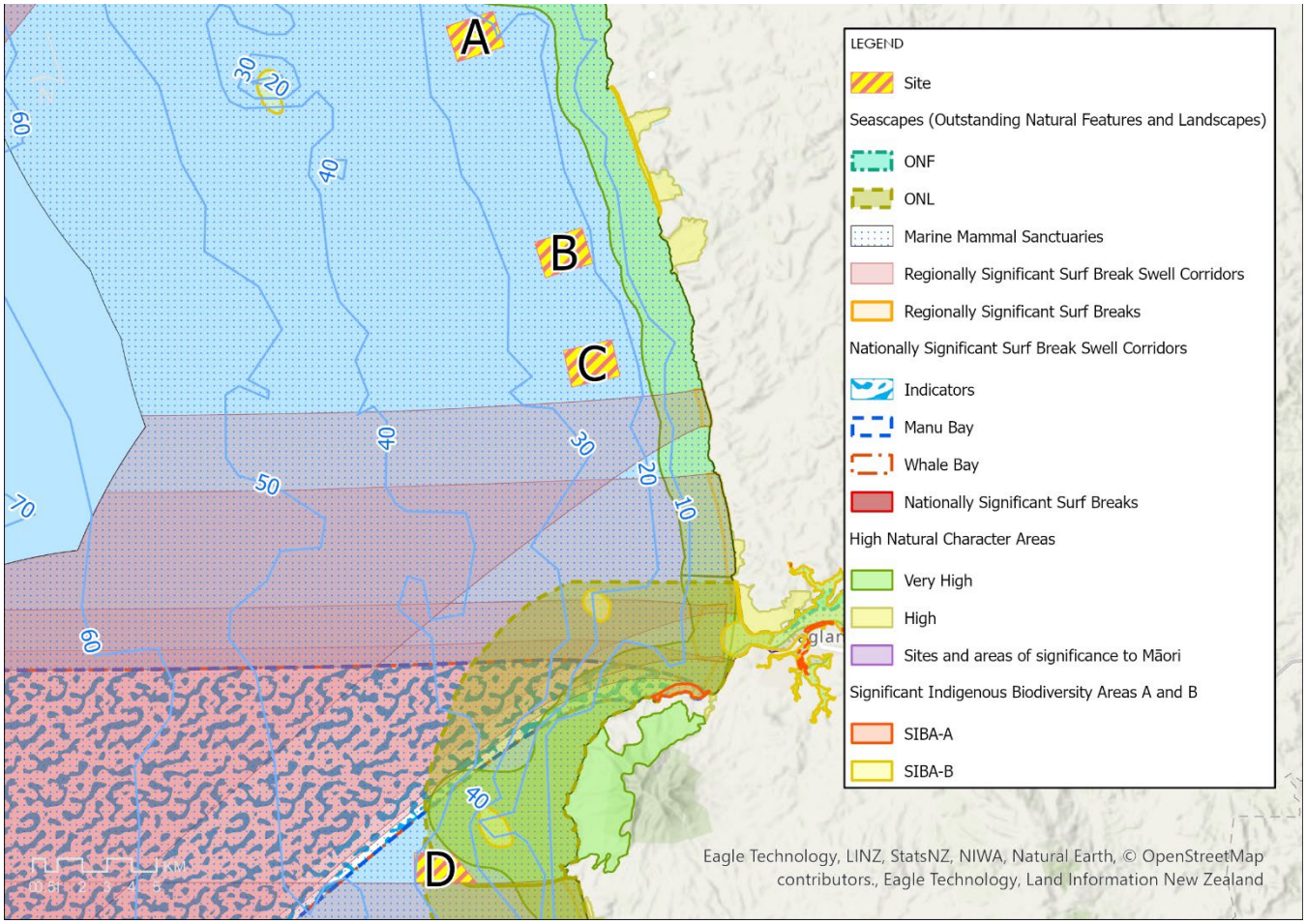

Figure 3: Relevant Landscape and Natural Character Overlays contained in the Proposed Waikato Coastal Plan

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If you have any questions, please contact me.

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