



12 February 2019

Focus Resource Management Group  
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Attention: Robin Britton

**RE: TE TAHUNA O AOTEA MOANA MARINE FARM, AOTEA HARBOUR – S92 RESPONSE –  
LANDSCAPE AND VISUAL EFFECTS**

This report has been prepared in response to an amended s92 request by Waikato Regional Council. It follows a meeting with Waikato Regional Council staff on 23<sup>rd</sup> August 2018 to discuss the original request for additional information prepared by Boffa Miskell Ltd. This meeting resulted in the original s92 request being amended to the following:

- a. *A statement outlining the acceptance of the Boffa Miskell report as the baseline (this responds to the original s92 requests 1,2, and 5);*
- b. *A photomontage from figure 6 showing the outline of the farm area (the one brought to the meeting will meet these requirements) (this responds to the original s92 requests 3).*
- c. *A description of the key sensitivities of viewer locations (this responds to the original s92 request 4).*
- d. *A statement clarifying that the application included a number of measures for the “avoidance of effects” and that mitigation was not required. Clarification of the recommendation to avoid using recessive coloured buoys in order to avoid unanticipated effects.*

**S92 Response**

The following response is provided to the amended s92 request:

S92 Request:

- a. *A statement outlining the acceptance of the Boffa Miskell report as the baseline (this responds to the original s92 requests 1,2, and 5)*

Response:

The MGLA report considered the application against the relevant statutory and non-statutory planning information available. This included the *Waikato Natural Character Study of the Waikato Coastal Environment 2016*, Boffa Miskell report.

The relevant findings of the Boffa Miskell report was adopted and generally accepted as the environmental baseline against which the effects on the natural character were assessed. The

natural character ratings provided at a regional level in the Boffa Miskell Report are not disputed by the MGLA assessment of effects.

It must be recognised however that Boffa Miskell report was undertaken at a regional scale and as such does not identify local nuances associated with the site. This is mostly relevant to the experiential factors of the baseline. The MGLA assessment considers the effect at a local level, refining the work undertaken by Boffa Miskell.

It is considered that the proposed spat farm can be established within Aotea Harbour, without affecting the outcomes or intent of the Boffa Miskell report.

S92 Request:

- b. A photomontage from figure 6 showing the outline of the farm area (the one brought to the meeting will meet these requirements) (this responds to the original s92 requests 3).*

Response:

It was agreed that a photograph from a view location from Tahuri Point, including the outline of the proposed farm, was sufficient to provide the required information for request 3 of the original s92. This image is attached to the back of this response.

S92 Request:

- c. A description of the key sensitivities of viewer locations (this responds to the original s92 request 4).*

Response:

In general, views from the elevated locations within Aotea (Tahuri Point) are more sensitive than those closer to sea level. This is because any change in the extent of current spat farming activities (current and proposed) close to Aotea, will be more obvious due to the higher viewing angle, and more naturally appearing landscape/seascape backdrop.

While potential exists for views of the proposed spat farm to result in a minor cumulative effect on natural character, the spat farm is close enough to the existing modified landscape/seascape around with Aotea to be visually associated with it.

While the Boffa Miskell report identifies the harbour as having high natural character at a regional level, at a local level natural character in this area (on the harbour and around its edge) has already been modified by an existing spat farm, buildings, road, pine forest and surrounding pastoral development. It is therefore considered that the more natural and more sensitive parts of Aotea harbour, including the bush covered coastal edge and ONFL to the north, are at sufficient distance to be unaffected by a proposal of this scale.

While more sensitive than lower lying view locations, views from the elevated locations are not sufficiently sensitive that the proposed spat farm would result in an unacceptable effect on either natural character or visual amenity.

Views from the lower lying areas around the edge of the harbour, on the water itself, and the more natural parts of the harbour (to the east) are considered to be less sensitive as the proposed spat farm will be viewed within the context of development associated with Aotea (including the existing spat farm, buildings, road, pine forest and pastoral development) beyond.

S92 Request:

- d. *A statement clarifying that the application included a number of measures for the “avoidance of effects” and that mitigation was not required. Clarification of the recommendation to avoid using recessive coloured buoys in order to avoid unanticipated effects.*

Response:

Request 6 of the original s92 sought the provision of a mitigation strategy. Mitigation is generally only required to lower the effects of an activity, when the adverse effects of that activity are at an unacceptable level (more than minor under the RMA). The application takes into consideration that the harbour is a valued “natural” environment and the proposal includes a number of measures aimed at the avoidance of unanticipated effects. Avoidance measures include the use of sea green buoys rather than black. As a result the effects will fall below the “minor” threshold and additional mitigation is not considered necessary.

At the above mentioned meeting, the visual prominence of different colour buoys was discussed and it was agreed that the associated visual effects would largely be dependent on the light conditions at the time of viewing. It was agreed that effects of visual amenity and natural character would be suitably addressed by limiting the colour of the spat buoys to the dark colours only, such as, green, blue, or black. White and bright coloured buoys (including orange) should only be used where required for navigation safety purposes or in compliance with any maritime regulations.

For any further clarification please contact us.



**Cathy Trentham**

BLA



**Dave Mansergh**

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