

Proposed Subdivision, Toko Developments Ltd, Toko Mouth

Natural Character and Landscape Effects Assessment

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Prepared by

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Introduction

Toko Developments Ltd is applying for Resource Consent to subdivide a further stage of its 4.6 ha property (Part Section 10 Block XV Coast SD) at Toko Mouth. Stage 1 of the development was consented in and involved the creation of 8 residential lots. As shown in **Figure 1**, Stage 2 involves 18 residential lots, a road and a balance lot.

The site is located within the Coastal Resource Area in the Clutha District Plan (CDP). In terms of Rule SUB.2 subdivision in the Coastal Resource Area is a discretionary activity and Council will consider the standards and criteria contained in Rule SUB.1(d) and SUB.4, the objectives and policies of the Coastal Resource Area, the Regional Policy Statement, Regional Coastal Plan and the New Zealand Coastal Policy Statement.

The purpose of this report is to assess the effects of the proposed development on natural character and landscape character and values. It will be structured as follows:

- Methodology
- Site and area description
- The proposed development and mitigation measures
- Natural character effects
- Landscape effects
- Statutory Planning Assessment
- Conclusion

Methodology

This assessment follows the concepts and principles outlined in the NZILA Best practice guidelines¹, and has been informed by a review of the relevant statutory provisions and a site visit on 11 June 2021.

¹ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. April 2021

Site and area description

The site is located on the Coombe Hay property adjacent to the settlement of Toko Mouth, which is located on the coast on the south side of the Tokomairaro River Mouth. The Toko Mouth settlement occupies low lying land directly behind the beach between the Tokomairaro River and Rocky Valley Creek. Inland, the settlement is largely contained by a low scrub covered coastal escarpment approximately 10m high, although stage 1 of the subdivision has provided for the extension of the settlement above this escarpment. The buildings of Coombe Hay farm are on the coastal terraces above the scarp.

The subdivision site is on the coastal terrace behind the settlement. This area is currently largely open pasture land but the first stage of the subdivision has resulted in provision for 8 residential lots, 1600 – 2090m² in area, along the perimeter of the southern part of the escarpment, and an access road linked to the settlement below. There is currently one house developed only.

The wider landscape context of the site is the coastal area focused on the Tokomairaro River mouth and the settlement of Toko Mouth. It is defined to the west by gently rising hills, largely under pasture cover and grazed, and reflecting a series of marine terraces. This hill country terminates in a low coastal scarp covered in a mix of native and exotic scrub (dominantly gorse, broom, meuhlenbeckia, flax and cabbage tree) and a strip of marram covered foredunes lies between this and the beach. A reef lies off-shore adjacent to the Toko Mouth settlement.

Toko Mouth settlement modifies the natural character of the dune country and has its own distinctive 'crib settlement' character. It is largely comprised of holiday homes and development is typically lineal in pattern with dwellings generally closely spaced along the roads or nestled against the back of the dunes or coastal escarpment. There are two large areas of open mowed reserve as well as an area of wetland. Houses are generally single story and modest in scale, although variable in age, architectural style, materials and colour. The roads are informal and rural in character, being metaled, narrow and with no footpaths. Whilst there are some fences, often boundaries between properties are open and undefined. The vegetation is a mix of hardy coastal natives and exotics.

Figures 2 - 8 illustrate the character of the site and area.

The proposed development and mitigation measures

The proposed development is the extension of a residential subdivision that was consented in The site is on the coastal terrace top to the west of the settlement of Toko Mouth. As shown in Figure 1, it is proposed to create 18 additional residential lots (between 1410m² and 1.1ha in area). A 15m wide public road will link with the road associated with Stage 1 and will provide access from Wangaloa – Toko Mouth Road. Except where modified by proposed conditions, it is proposed that the CDP Urban Resource Area site development performance standards will apply to residential development on these lots.

The development is mainly located on flat – gently rising terrace top landform. At its northern end (Lots 11 - 13.) the land rises, reflecting an older less distinct terrace face, and this area is the most visually prominent part of the site. To minimise adverse natural character and landscape effects the lot layout and associated proposed development controls avoid building sites on this area, lot 13 having a building platform on its lower northern slopes. This ensures that landform largely screens the development from Wangaloa – Toko Mouth Road, visually containing the settlement.

As for Stage 1 of the development, to ensure that the ensuing residential development integrates acceptably with the character of the Toko Mouth settlement and to avoid or minimise any adverse effects on natural character and rural amenity, the following mitigation measures are recommended:

- (a) All buildings shall be single story and a maximum of 5m height above existing ground level.
- (b) For Lots 1 – 3 and 8 – 13, a minimum setback of 15m shall apply to all buildings from the top edge of the escarpment. Building siting shall otherwise be controlled as follows:
 - i) On Lot 12, buildings shall not be located above the 96m contour
 - ii) On Lot 13, the dwelling is to be located within the building platform identified in Figure 1.
- (c) All buildings are to be finished in either naturally weathered timber or locally appropriate stone, or in colours that have low levels of contrast with the colours of its rural landscape setting. Painted surfaces will have light reflectivity ratings of no more than 25%.

- (d) All services are to be located below ground
- (e) The road is to be designed to reflect the existing Toko Mouth settlement character with gravel surface and soft edges (i.e. no kerb and channel). Any footpaths shall also have gravel surfaces, and there shall be no street lighting.
- (f) Driveways are to retain an informal rural character with gravel surface and soft edges (i.e. no kerbs). Monumental gates and driveway lighting is not permitted.
- (g) Water tanks will be sited, and / or buried and / or screened (by planting), and coloured to match the building colours, to have minimal visual impact from beyond the property.
- (h) Fencing is to be confined to standard rural post and wire construction. Where boundary definition is required, planting rather than fencing is promoted.
- (i) Except for the area required for driveway access (maximum 6m) a 3m strip along the road boundaries of the lots are to be established in locally appropriate indigenous species in accordance with the guidelines in **Appendix A** to provide a natural setting to the buildings.
- (j) For Lots 1 – 3 and 8 – 13, a 5m wide strip along the escarpment boundaries is to be established in locally appropriate indigenous species in accordance with the guidelines in **Appendix B**, to provide some screening of the houses as viewed from the township below, and to assist in maintaining bank stability.

The proposed mitigation planting specified in Appendix B, along the escarpment boundary, is generally of lower stature so as to strike the right balance between screening / softening the visual impact of new buildings from external viewpoints and provision for views outward from within the new lots.

Natural character effects

Natural character is defined as:

'Natural character is the distinct combination of an area's natural characteristics and qualities, including degree of naturalness'².

The effects of the proposed development on natural character are an issue given the proximity of the site to the coast and its Coastal Resource Area zoning.

The inland extent of the coastal environment

Although the Coastal Resource Area in the CDP extends inland as far as Wangaloa – Toko Mouth Road, it is my assessment that in terms of the guidance provided in Policy 1 of the New Zealand Coastal Policy Statement 2010 and as identified in Moore et al (2015)³, the top of the coastal escarpment provides appropriate definition of the inland extent of the coastal environment. The Toko Mouth settlement, being seaward of the escarpment, is within the coastal environment, but the site itself is on the boundary or just beyond. Given the CDP zoning, the location on or directly adjacent to the boundary, I consider that it the effects of the development on the natural character of the coastal environment are an important and relevant matter for assessment.

Existing natural character

As discussed in the Moore et al report the Toko Mouth area received a medium (moderate) rating for natural character based on:

- The modification to the sand dune landforms by the settlement and by the presence of Marram.
- The mixed indigenous / exotic character of the vegetation.
- Moderate health and modification of the intertidal and aquatic habitats
- Infaunal communities typical of disturbed sandy beaches of southern New Zealand.
- The presence of dwellings and other buildings associated with the settlement.
- Medium – high wild and scenic qualities.

² Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. April 2021

³ Moore et al (2015) Coastal Environment of Otago, Natural Character and Outstanding Natural Features and Landscapes Assessment, Clutha District Section Report.

Natural character effects of the proposed subdivision

Natural character effects describe the impact of the proposed development on the biophysical integrity and natural processes of the areas affected, as well as sensory / experiential effects on perceptions of natural character. They can be positive or adverse in nature and their degree is determined with reference to the degree of existing modification and the sensitivity of the existing environment to change, and the scale and nature of the proposed development. The degree of effect will be rated in terms of a 7 point scale from very low to very high as outlined below:

Degree of effect assessment scale

Very low Low Moderate - low Moderate Moderate - high High Very high

The subdivision involves the extension of the Toko Mouth settlement. Prior to stage 1, this was contained below the coastal scarp but stage 1 of the subdivision provides for a line of houses above the scarp, controlled as to height and colour and mitigated by plantings. This further subdivision proposed will extend the township on the terrace surface above the scarp, both behind and to either side of stage 1. The natural character of the area affected is already significantly modified by agricultural use and is largely under exotic pasture cover. The development will change the character from rural to ‘township’ and reduce naturalness by the introduction of roads and houses. On the positive side, there will be greater indigenous biodiversity due to the plantings required. The natural landform will remain largely unchanged at the larger scale except that the proposed access road from Wangaloa – Toko Mouth Road will require some earthworks, and existing drainage patterns may be modified as a result of this to a minor degree.

Overall, it is my assessment that the effects of the proposed development on natural character will be adverse / low. Whilst the township scale will expand, the existing natural character is already significantly modified by the existing township and the agricultural land use, and the proposed development controls will ensure the impact of additional built form is modest, especially when the proposed plantings mature. There will be no significant changes to any natural processes.

Landscape Effects

Landscape is defined as:

'Landscape embodies the relationship between people and place: it includes the physical character of an area, how the area is experienced and perceived, and the meanings associated with it'⁴.

As discussed above, the wider landscape context of the site is the coastal area focused on the Tokomairaro River mouth and the settlement of Toko Mouth, and defined to the west by gently rising largely pasture-covered hills. It includes the ocean, the beach, the Tokomairaro River mouth and estuary, the dunes and the Toko Mouth settlement, the scrub covered coastal escarpment and the rural / pastoral land above.

Existing landscape values

Physical attributes

There are no natural science values of especially recognized significance in the immediate vicinity of the site except that the CDP identifies the river at Toko Mouth as a significant wetland. In the wider coastal environment dynamic coastal processes are evident and sustain largely natural beach, dune and cliff landforms. The natural landscape values are modified by the widespread presence of Marram grass and around the Toko Mouth settlement, by dune modification and the presence of built elements. Natural landscape values however, are supported by the considerable presence of indigenous vegetation in places, including areas of wetland.

Perceptual attributes

Whilst naturalness values are modified by the presence of the settlement, and in the wider setting by agricultural land use, the area has scenic qualities based on the traditional crib settlement character of the township and the way it nestles recessively into its coastal / rural setting. The settlement has a strong sense of place based on its coastal crib settlement character that I believe is important to respect. Key elements supporting this are the modest scale and unpretentious character of the houses, the limited definition of boundaries by

⁴ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. April 2021

fencing, and the lack of urban infrastructure such as sealed roads, footpaths, kerb and channel and street lighting.

In the working rural landscape surrounding, landscape values are based on openness and legible natural landform under grassland cover. Transient values associated with the coastal setting are important in this landscape and include the various moods and sea states of the ocean, the rhythm of tides, the presence of marine birds and mammals and the sounds of the sea.

Associative attributes

The CDP does not identify any potentially outstanding natural landscapes or outstanding natural features in this specific area, although Chrystalls Beach to the north of the river mouth is identified as a potentially outstanding natural landscape. The CDP identifies the river at Toko Mouth as a significant wetland.

The name Tokomairaro can be translated as 'place where the canoe must be poled'⁵ and the Otago Regional Coastal Plan lists Kai Tahu cultural and spiritual values for the Tokomairaro Coastal Protection Area. I am unaware of any particular historic heritage significance for Toko Mouth. As a holiday / recreational destination however, it is likely that the Toko Mouth settlement and beach will be a place valued for its personal associations to many.

The Coastal Environment of Otago report (Moore et al, 2015)⁶ assessed the landscape rating for the Toko Mouth area of the coastal environment (including the township) as high - medium overall, and not outstanding.

Viewpoints assessment

The key public viewpoints impacted by the proposed subdivision are the Toko Mouth settlement and beach to the east and south, and Toko Mouth Road to the north and west. The following is a brief assessment of the visual effects from representative viewpoints in these locations.

⁵ En.wikipedia.org

⁶ Moore et al (2015) Coastal Environment of Otago, Natural Character and Outstanding Natural Features and Landscapes Assessment, Clutha District Section Report.

Toko Mouth river mouth / beach (see Figure 4)

Relevance of viewpoint	A popular recreational beach adjacent to a crib settlement. This viewpoint is also representative of effects from the more easterly parts of the settlement nearby.
Viewers / Viewer sensitivity	The area is a holiday / recreational destination based to a large extent on its coastal amenity values. I assess viewer sensitivity as high.
Approx distance to the proposed development	600m
Existing view description	The site is visible in the middle distance above the scrub covered coastal scarp. In the foreground, is the Tokomairaro River with fairly densely spaced cribs are lined alongside its banks. Above the escarpment, the first of the houses associated with the subdivision stage 1 is visible – not yet softened by the required plantings. Beyond, in the background, is the rural landscape including the Coombe Hay homestead, pasture covered slopes, lineal exotic shelter trees and patches of indigenous scrub / forest.
Description of visual effects	Much of the proposed stage 2 development will be partially screened by the stage 1 houses and plantings in front. Development on Lots 8 – 12 will be the most visible and will continue the pattern of development along the top of the escarpment. Building on Lot 13 will appear as an outlier and the highest part of the escarpment top will remain free of buildings. Built impact will be minimised by the design controls, including building height, colour and escarpment edge plantings. The development overall, will result in awareness of an extension to the township at a higher level, above the escarpment.
Visual effects assessment	Naturalness will be further reduced but to a minor extent given the presence of the existing township, the proposed native plantings and the building controls. These controls will also ensure that the extended township integrates with the character of the existing.

Toko Mouth settlement adjacent to Riverview Road turn-off (see Figure 5)

Relevance of viewpoint	Indicative of viewpoints close to the escarpment base.
Viewers / Viewer sensitivity	The area is a holiday / recreational destination based to a large extent on its coastal amenity values. I assess viewer sensitivity as high.
Approx distance to the proposed development	150m
Existing view description	The camp ground including various existing buildings are set against the scrub covered escarpment. From this close proximity to the base of the scarp, landform screens the existing stage 1 dwelling.
Description of visual effects	Dwellings on lots 10 – 13 will probably be visible to varying extents, dependent on their exact siting. These will be seen over the escarpment top on the immediate skyline. The visual impact of these dwellings will be minimised by the proposed height and colour requirements and eventually, by the proposed cliff-top plantings.
Visual effects assessment	Naturalness will be further reduced but to a minor extent given the presence of the existing township, the proposed native plantings and the building controls. These controls will also ensure that the extended township integrates with the character of the existing.

Beach adjacent to Rocky Valley Creek (see Figure 6)

Relevance of viewpoint	Representative of views toward the site from the beach and cribs to the south.
Viewers / Viewer sensitivity	The area is a holiday / recreational destination based to a large extent on its coastal amenity values. I assess viewer sensitivity as high.
Approx distance to the proposed development	180m
Existing view description	This is a view toward the site which is located behind mature macrocarpa trees lining the top of the escarpment. In the foreground is Rocky Valley Creek which has dune lands in a relatively natural state to its south. Various cribs are located in the area between the creek

	and the escarpment and in the dunes nearby. The existing Coombe Hay farm cottage is visible near the top of the escarpment and an additional dwelling is likely to be visible to its right, when developed on the stage 1 lot adjacent.
Description of visual effects	The large macrocarpa trees are likely to be removed (opening up sun access to the properties below) and dwellings on lots 1 – 3 will be visible in their place. Buildings on the sites further back are unlikely have much visibility from this viewpoint given the low viewing angle and the landform screening provided by the scarp, and the height controls proposed. The proposed clifftop planting and the building controls will help to minimise the visual impact of dwellings on Lots 1 – 3. The removal of the large trees will significantly change the view, but given their exotic character, will not unduly reduce naturalness.
Visual effects assessment	Naturalness will be further reduced but to a minor extent given the presence of the existing township, the proposed native plantings and the building controls. These controls will also ensure that the extended township integrates with the character of the existing.

Toko Mouth Road to the north of the settlement (see Figure 7)

Relevance of viewpoint	Toko Mouth Road is an important public road in this area
Viewers / Viewer sensitivity	The area is a holiday / recreational destination based to a large extent on its coastal amenity values. I assess viewer sensitivity as high.
Approx distance to the proposed development	580m
Existing view description	The site is visible as the higher terrace top land forming the backdrop to this view. The Toko Mouth settlement is visible in two enclaves, one close-by and adjacent to Toko Mouth Road, and the other more distant and adjacent to the bank of the Tokomairaro River. One house on stage 1 of the subdivision can be seen above the escarpment and is as yet unsoftened by the clifftop mitigation plantings. Further dwellings from stage 1 may have some visibility but will be significantly screened by the escarpment landform (due to the viewing angle). Mature exotic trees in the middle distance screen much of the site but the pasture

	covered slopes of proposed lot 13 can be seen above where Wangaloa – Toko Mouth Road cuts up the hill.
Description of visual effects	Buildings on lots 8 – 12 will be largely screened by existing intervening vegetation but if this were to be removed, would be seen in the context of the existing terrace-top house, lined along the escarpment top. The visual impact of these would be controlled by the proposed height and colour requirements and eventually, the cliff-top plantings. Houses in the remainder of the subdivision will have low visibility given the flat landform and the viewing angle across the escarpment top. From this viewpoint, the most prominent house will be that on the building platform on Lot 13. This will appear as part of the rural environment, isolated from the rest of the development and its visual impact will be mitigated by the height and colour controls and the landform backdrop.
Visual effects assessment	Naturalness will be further reduced but to a minor extent given the presence of the existing township, the proposed native plantings and the building controls. These controls will also ensure that the extended township integrates with the character of the existing.

Wangaloa - Toko Mouth Road, north-east of the entrance to Coombe Hay farm (see Figure 8)

Relevance of viewpoint	Wangaloa - Toko Mouth Road is an important public road in this area
Viewers / Viewer sensitivity	The area is a holiday / recreational destination based to a large extent on its coastal amenity values. I assess viewer sensitivity as high.
Approx distance to the proposed development	100m
Existing view description	This a view north-eastward along Wangaloa – Toko Mouth Road where it descends toward Tokomairaro River and Toko Mouth settlement. The site is currently seen as open rolling pastureland to the east side of the road with the ocean visible beyond.
Description of visual effects	The main effect of the subdivision from this viewpoint will be the proposed new road and the earthworks associated with its development. These will modify the existing natural landforms to an extent. There may be some minor visibility of built form on the Lot 13 platform but all other lots will be screened by landform.

Visual effects assessment	Naturalness will be further reduced by the road and earthworks but otherwise, change to the rural character will be limited.
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Landscape effects of the proposed subdivision

Landscape effects are defined as follows:

‘Landscape effects are consequences for landscape values of changes to landscape attributes. Change itself is not an effect. Landscapes are always changing.’⁷

I assess the landscape effects of the development against the landscape values discussed above. Landscape effects may be positive or adverse in nature and I rate the degree of effect in terms of the 7 point rating scale discussed under natural character effects above.

Toko Mouth settlement is characterised by a series of fairly dense, often lineal nodes of dwellings of generally modest scale and informal ‘crib’ character, arranged around river banks, wetlands and the coastal escarpment. The proposed development extends the already consented stage 1 of the subdivision – which expanded the settlement above the previously containing escarpment, and is located largely on the flat terrace surface above this. The subdivision reflects modern septic disposal requirements and is less dense than much of the existing settlement, but it is sensitive to the character of the existing settlement in that it:

- Includes controls to reflect the existing ‘informal’ streetscape character.
- Includes controls to minimize the impact of individual buildings.
- Will result in a significant amount of locally appropriate indigenous vegetation.
- Responds largely to the existing landform in that it does not significantly encroach on the containing landforms behind the terrace top.

The site is at the edge of the coastal environment and the development will have no impact on dynamic coastal or estuarine processes and associated values. It will have some localized effects on the natural landforms related to earthworks for the proposed road and for development on Lots 12 and 13 in particular, which are located on low hill forms behind the flat terrace top. It will extend the township footprint, changing the terrace top area from rural to township character but in so doing, indigenous biodiversity will be enhanced. Naturalness

⁷ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. April 2021

values will be reduced by the greater extent of the township, but this is not unduly significant given that the current rural land use already modifies naturalness values considerably.

The new development will necessarily have a lower density than much of the existing township (due to septic disposal requirements) and it is to be expected that the new dwellings proposed, built to modern standards, will have a different scale and character to many of the existing crib style dwellings in the settlement currently. This is a function of the natural development of settlements generally, with various development stages being having distinctive character. The proposed mitigation measures however, will ensure that the new development integrates acceptably and does not have undue dominance, to the point that the character of the settlement generally is significantly altered.

Overall, it is my assessment that effects on the character and values of the Toko Mouth landscape will be adverse / low.

Statutory planning assessment

Rule SUB.2 and Rule COA.5 in the Clutha District Plan (CDP) makes subdivision in the Coastal Resource Area a discretionary activity. Rule COA.5 refers to the assessment criteria as follows:

'In assessing any application under this rule, Council in addition to those matters set out in Section 104 of the Act shall also consider the criteria of Section 3.7 Subdivision, Rule SUB 1(d) and Rule SUB.4, the objectives and policies of the Coastal Resource Area and the Regional Policy Statement, Regional Coast Plan and the New Zealand Coastal Policy Statement'.

Those matters relevant to the natural character and landscape effects of the proposed development in the CDP and NZCPS are identified, with brief comment below as follows. The Otago Regional Policy Statement and Regional Plan: Coast are not specifically addressed due to the high level, overarching nature of the former, and the fact that the latter is mainly relevant to areas below mean high water springs.

To relate my effects ratings to the terminology of the Resource Management Act 1991 (RMA), I adopt the relationship outlined in the NZILA best practice guide⁸, outlined below.

⁸ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. April 2021

Very low	Low	Low- mod	Moderate	Mod- high	High	Very high
Less than minor		Minor	More than minor		Significant	

Clutha District Plan

<p><i>Objective COA.1</i> <i>To preserve the natural character of the coastal environment and protect it from inappropriate subdivision, use and development.</i></p>	<p>Toko Mouth settlement and agricultural land use in the area surrounding, already modifies the natural character in this area. In my assessment, the proposed extension of the settlement is located and controlled such that further adverse effects on natural character will be no more than minor.</p>
<p><i>Objective COA.4</i> <i>To protect the outstanding natural features and landscapes of the Districts coastline from inappropriate subdivision, use and development.</i></p>	<p>Toko Mouth is not identified as an outstanding natural feature or landscape in the CDP, or in the Coastal Environment of Otago Natural Character and Outstanding Natural Features and Landscapes Assessment⁹.</p>
<p><i>Policy COA.1</i> <i>To ensure the subdivision, use and development of the coast and in particular, buildings and structures avoids, remedies, or mitigates any adverse effects on:</i></p> <ul style="list-style-type: none"> • <i>Natural character values</i> • <i>Outstanding natural features and landscapes</i> • <i>Amenity values of the coast</i> 	<p>It is my assessment that the proposed subdivision will have minor adverse effects on natural character values and that there are no outstanding natural features or landscapes impacted. As regards amenity values, I consider that the design and the proposed development controls will mitigate adverse effects by ensuring that the subdivision is not unduly visually prominent and that it integrates acceptably with the character of the existing Toko Mouth settlement.</p>
<p><i>Policy COA.2</i> <i>To manage the subdivision, use and development of the Coastal Resource Area to</i></p>	<p>The proposed development provides for the sensitive expansion of an existing coastal settlement. Whilst adverse effects are not</p>

⁹ Moore et al (2015) Coastal Environment of Otago Natural Character and Outstanding Natural Features and Landscapes Assessment – Clutha District Assessment Report.

<p><i>ensure adverse effects are avoided as far as practicable and that where complete avoidance is not practicable, that adverse effects are mitigated or provision is made for remedying those effects.</i></p>	<p>completely avoided, they are appropriately mitigated in my assessment.</p>
<p><i>Policy COA.10 To control the erection of buildings in the coastal area to ensure adverse effects on natural character are avoided, remedied or mitigated.</i></p>	<p>Development design controls are included to ensure that the effects on natural character associated with additional built form, are appropriately mitigated.</p>
<p><i>Policy COA.11 To preserve the areas of the Coastal Resource Area where natural character is largely uncompromised through restricting, to the extent practicable, subdivision, use and development to areas where natural character is already compromised.</i></p>	<p>In my assessment, Toko Mouth is a part of the Coastal Resource Area, where natural character is already compromised. I consider that the proposed subdivision is consistent with this policy.</p>

New Zealand Coastal Policy Statement 2010

<p><u><i>Policy 6 - Activities in the coastal environment</i></u> <i>In relation to the coastal environment:</i> <i>(c) Encourage the consolidation of existing coastal settlements and urban areas where this will contribute to the avoidance or mitigation of sprawling or sporadic patterns of settlement and urban growth.</i> <i>(f) Consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable.</i> <i>(h) Consider how adverse visual impacts of development can be avoided in areas</i></p>	<p>The proposed subdivision extends the existing Toko Mouth settlement and is adjacent to existing development. Its density largely reflects the practicalities of septic disposal. In my assessment it does not constitute a sprawling or sporadic pattern of development.</p> <p>Given present building standards, the development proposed will not be entirely similar to the character of the existing Toko Mouth settlement. The proposed development conditions however, seek to ensure that its character integrates acceptably with that of the settlement.</p> <p>The proposed subdivision is located on a coastal terrace landform and the edges of this</p>
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<p><i>sensitive to such effects, such as headlands and prominent ridgelines, and as far as practicable and reasonable apply such controls or conditions to avoid those effects.</i></p>	<p>(escarpment top areas) have a moderate – high degree of visual sensitivity. Stage 1 of the subdivision however, has already provided for escarpment top development and the development proposed will extend this rather than introduce an entirely new effect. The mitigation measures proposed for Stage 1 (primarily building height and colour controls and provision for plantings) are adopted for the current stage, and the design avoids the introduction of built form to the highest, most visually sensitive part of the site.</p>
<p><u>Policy 13 – Preservation of natural character</u> <i>(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development</i> <i>(a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and</i> <i>(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment....</i></p>	<p>The site not within an area of outstanding natural character and Policy 13 (1) (a) is therefore not relevant. In my assessment, the proposed development does not give rise to significant adverse effects on natural character, and avoids and mitigates other adverse effects. I therefore consider it to be consistent with Policy 13 (1) (b).</p>
<p><u>Policy 15 – Natural features and natural landscapes</u> <i>To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:</i> <i>(a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and</i> <i>(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of</i></p>	<p>The site is not within / does not impact any outstanding natural feature or landscape and Policy 15 (a) is therefore not relevant. In my assessment, the proposed development does not give rise to significant adverse effects on natural features and landscapes within the coastal environment, and avoids and mitigates other adverse effects. I therefore consider it to be consistent with Policy 15 (b).</p>

<i>activities on other natural features and natural landscapes in the coastal environment...</i>	
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Conclusion

The application involves the continuation of recent subdivision that extends the Toko Mouth settlement onto the coastal terrace above the existing township. The site is within the Coastal Resource Area in the CDP and in my assessment, on the margin of the coastal environment as per the Policy 1 guidance in the NZCPS 2010. The development has been designed to avoid the most visually prominent, upper part of the site and includes design controls aimed at minimizing the prominence of built form and at integrating the development to the extent practicable with the character of the existing settlement.

Natural character in this area is already significantly modified and taking this and the proposed mitigation measures into account, I have assessed the natural character effects of the proposed development as no more than adverse / low (minor). Likewise, I consider that effects on landscape values will be no more than adverse / low (minor). I consider that the proposed subdivision is generally consistent with the statutory provisions relating to natural character and landscape matters.

Mike Moore

Registered NZILA Landscape Architect

Appendix A: Planting specification

Toko Developments Ltd Subdivision. Road boundary planting strip

A 3m wide strip along the road and / or ROW frontage of Lots 1 – 12, Lots 14 – 15 and Lot 18 is to be established in locally appropriate indigenous species in accordance with the guidelines below. The entire frontage is to be planted except for the area required for access (maximum length – 6m).

The plantings are to be established at maximum spacing's of 1.5m (two rows minimum). The species to be planted are listed below and the planting composition for each lot should include approximately equal numbers of each species. The plantings are to be implemented and maintained to ensure successful establishment including protection from animal browse, weed control, irrigation and replacement of any plants that fail to thrive, as required.

- *Austroderia richardii* (Toetoe)
- *Cordyline australis* (Cabbage tree)
- *Coprosma propinqua* (Mingimingi)
- *Fuchsia excorticata* (Fuchsia)
- *Griselinia littoralis* (Broadleaf)
- *Hebe salicifolia* (Koromiko)
- *Leptospermum scoparium* (Manuka)
- *Myoporum laetum* (Ngaio)
- *Myrsine australis* (Mapou)
- *Olearia fragrantissima*
- *Phormium tenax* (Flax)

Appendix B: Planting specification

Toko Developments Ltd Subdivision. Escarpment boundary planting strip

A 5m wide strip along the escarpment boundaries of Lots 1 – 3 and Lots 8 - 13 is to be established in locally appropriate indigenous species in accordance with the guidelines below.

The plantings are to be established at maximum spacing's of 1.5m (two rows minimum). The species to be planted are listed below and the planting composition for each lot should include approximately equal numbers of each species. It is assumed that the specific layout of the planting will account appropriately for view shafts from the new houses. The plantings are to be implemented and maintained to ensure successful establishment, including protection from animal browse, weed control, irrigation and replacement of any plants that fail to thrive, as required.

- *Austroderia richardii* (Toetoe)
- *Coprosma propinqua* (Mingimingi)
- *Cordyline australis* (Cabbage tree)
- *Hebe salicifolia* (Koromiko)
- *Leptospermum scoparium* (Manuka)
- *Phormium tenax* (Flax)