

22 September 2023

Lawrence Yule  
Mangakuri Station  
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Dear Lawrence

**Re: Proposed Residential Subdivision, Mangakuri (RM230016)  
Addendum to Landscape, Natural Character & Visual Effects  
Rural Amenity Assessment**

As you are aware, I prepared the Landscape, Natural Character and Visual Effects Assessment of the proposed subdivision of Mangakuri Station, at Mangakuri Beach. I understand that the proposal has been lodged, and that the Council have requested more information in regard to the assessment of the proposal's potential effects on *rural amenity*.

As identified in my assessment, the site is zoned Rural under the Operative District Plan, and General Rural under the Proposed District Plan. The Council sets out in the request for more information a series of objectives and policies in regard to the General Rural zone, and in particular notes the following:

- ▶ **RLR-O2** *The primary production role and associated amenity of the District's rural land resource is retained, and is protected from inappropriate subdivision, use and development.*
- ▶ **RLR-P3** *To minimise fragmentation of the District's rural land resource through directing lifestyle subdivision to the Rural Lifestyle Zone and limiting lifestyle subdivision in the General Rural Zone and in particular, in the Rural Production Zone.*
- ▶ **GRUZ-P8** *To limit residential and rural lifestyle subdivision that results in fragmentation of the rural land and/or that restricts the use of rural land for productive purposes.*

I agree with the intent of these provisions and consider that they align with current national direction on urban and built form development. The new Natural & Built Environments Act and the Spatial Planning Act both point to more holistically planned residential development, which is further underpinned by national policy such as the National Policy Statement for Highly Productive Land and the National Policy Statement for Urban Development. Further guidelines such as the New Zealand Urban Design Protocol set out the importance of Context, Character and Custodianship.

Within this context, I find rule **SUB-R5** somewhat at odds with the objectives and anticipated outcomes. This rule allows, as the Council request sets out, the creation of a "lifestyle site" every 3 years. Such a rule promotes long term fragmentation of the rural environment, this having been demonstrated in many districts across the country since the



enactment of the Resource Management Act. The rule does not require any consideration of the quality of the rural land resource, nor does it seek to achieve quality rural amenity outcomes. It is solely a time-based fragmentation policy, often resulting in significant adverse landscape and amenity effects.

Mangakuri Station is a very large land holding, and through SUB-R5 it would be possible to create a fragmented development whereby singular lifestyle properties are widely scattered over the various separate land titles in the applicant's ownership, then wait 3 years and repeat. However, this was not the approach considered for the proposal. Rather, a planned and well considered development has been proposed that clusters development in order to minimise fragmentation, and anchors this within a strong coastal amenity vegetation framework. In my opinion, this is best practice as it considers development in a holistic and planned way and allows for the incorporation of appropriate mitigation measures and achievement of longer-term positive landscape and environmental outcomes.

The Land Use Capability of the proposed site is Class 7. It is somewhat steep and exposed to the coast. From a landscape perspective, it is not difficult to read that this area of Mangakuri Station is less productive than the more sheltered, fertile elements of the farm that are found inland. This can be seen through the legibility and formation of the landforms in the wider area, the wind-blown nature and species type of the vegetation, and the pockets of surface erosion resulting from repeated coastal saturation. Irrespective of any zoning, as I have identified in my assessment, this site has a strongly identifiable coastal character. This is further reinforced by its proximity to the existing beach settlement and is strongly defined by the prominent ridgelines behind the site.

By contrast, the wider farm on the inland side of the coastal ridgeline reinforces the rural amenity. This wide expanse of farmland country is part of a long sequence of productive farmland country extending from the settled areas of Waipawa and Waipukuaru to the first coastal ridgelines. This part of the landscape exudes a strong sense of productive capacity, visible through the various cropping and grazing regimes on the flatter terraces and the presence of rural built form such as woolsheds and stock yards. Older, more traditional farming residences are typically located close to the farming infrastructure, the dwellings and built form clustered together and usually surrounded by shelter and amenity vegetation.

The contrast between the two landscapes is pronounced. The winding journey from the main highway is enclosed, the views framed within valleys that encapsulate rural amenity. This immediately changes at the coast – crossing over the ridgeline the seascape opens up and there is a freshness to the air. The vegetation changes, with coastal native species becoming more prevalent and exotic trees showing the stresses of salt-laden wind exposure. The tendency is to slow down and take in the destination. This is the signal of a new experience, a coastal landscape.

As identified in my assessment, these coastal attributes are what has driven the Mangakuri proposal. The desire has been to create a landscape-led development within a part of the station that has least productive value. Rather than creating a fragmented development through ad hoc, one-off lifestyle developments over a period of time, the proposal seeks to cluster the built form and anchor it to the coast with appropriate vegetation. It strengthens the connection to the existing settlement, enhancing its coastal character.

By keeping the development on the coastal side of the ridgeline, the more traditional rural amenity of the inland farm is retained. The proposal speaks to and enhances its location on the coastal fringe, visible only when a person travels past



the threshold of the rural landscape. It is contained to the outer edge of the farm, and so avoids larger scale fragmentation that is more likely to occur through slow, unplanned lifestyle site creation.

In this regard, I am of the opinion that the proposal is entirely consistent with **RLR-O2, RLR-P3 and GRUZ-P8**, and the anticipated tighter controls surrounding subdivision and potential fragmentation of the rural environment. Although the zoning may be different to the immediate coastal beach settlement (large lot residential), the landscape connection to this zone is significantly stronger than the site's connection to the rural landscape inland. Its containment within the coastal-facing landform, immediately adjacent to the existing beach settlement, means that its rural amenity is already significantly diminished. This is a coastal development in a coastal landscape, with effects on the wider, more appreciable rural amenity largely avoided.

I am happy to meet with Council and discuss these opinions in more detail, should this be required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shannon Bray'. The signature is fluid and cursive, with a large loop at the end.

Shannon Bray  
Registered Landscape Architect