

b r o w n

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e. s 7(2)(f)(ii)

Dear s 7(2)(f)(ii)

**RE: MAUAO PLACEMAKING STRUCTURES APPLICATION RC29606:
LANDSCAPE & NATURAL CHARACTER EFFECTS REVIEW**

As requested by Tauranga City Council, this report comprises a review of the application by Tauranga City Council for the erection of structures / installations at four locations on Mauao:

1. Waikorire: a new entry / exit 'gateway' structure and pouwhenua;
2. Awaiti: a raised timber platform and seating;
3. The Water Tank site: an amphitheatre landform; and
4. The 'false summit' site: vegetation clearance and fencing to protect archaeological sites.

All four installations are assessed and reviewed in relation to the landscape and natural character values of Mauao. In relation to landscape effects, there is a strong focus on the maunga's perceptual and associative / cultural attributes, whereas the review of natural character effects focuses more on Mauao's biophysical values, while also recognising associative links to those values.

1. Introduction

More specifically, this review has been undertaken referencing the following documents:

- The *Mauao Placemaking Project Application for Resource Consent - AEE*, prepared by Beca Limited, December 2022;
- The *Mauao Awaiti Platform Developed Concept*, Law Creative, November 2022; and
- The *Mauao Placemaking Improvements Landscape Assessment*, prepared by Beca Limited, December 2022;

Law Creative's *Developed Concept* and Beca's *Landscape Assessment* help to explain the proposed structures and installations, together with the physical and cultural settings for each of them, while Beca's AEE describes the cultural context for the current proposals (involving input from the Mauao Trust jointly owned by Ngāi Te Rangi, Ngāti Ranginui and Ngāti Pukenga) and some of the statutory instruments relevant to the various components of the application.

2. Beca Limited's Landscape Assessment

The Application's December 2022 Landscape Assessment contains the following sections:

- 1) An introduction to the assessment process and method;
- 2) A description of the installation proposals, including their tāngata whenua project drivers;
- 3) A description of Mauao's existing environment, subdivided into its biophysical, perceptual / experiential, and associative values – linked to the four application sites;
- 4) A summary of relevant policy;
- 5) An assessment of natural character effects;
- 6) Assessment of landscape character effects, incorporating viewshed analyses and viewpoint analyses (with related photos);
- 7) Conclusions incorporating a summary of effects and recommendations;
- 8) Appendices 1-5: Mauao interpretation and placemaking design document; placemaking improvement and viewpoints location plan; viewpoint photos; viewshed analysis; and statutory planning evaluation.

The structure of the report appears to be sound and, as a whole, appears to meet the broad requirements of *Te Tangi a te Manu* (May 2022), which is now the NZILA's guideline document in relation to landscape assessment. In particular, I found the viewpoint analyses undertaken for each installation / structure to be very helpful in relation to this review.

3. Analysis of The Application Sites

In the following sections, I briefly summarise and review Beca's analysis of the four installation sites and proposals.

Mauao As A Whole At Present

In my view, the Biophysical nature and content of Mauao is accurately described at Section 3.1 of the Beca Landscape Assessment, focusing very strongly on its volcanic profile and native vegetation cover. This is followed by Section 3.2 addressing the maunga's Perceptual and Experiential attributes and values. Importantly, Mauao's sense of connection with both suburban Tauranga and "*more distant locations across the wider region*" is described, as are some of the factors which contribute to these connections – perhaps most notably its "*distinctive volcanic dome, located at the end of a sand tombolo*". Among the characteristics identified that relate to the current application are: "*land*

use patterns [which] contribute to the vividness of the landscape feature, forming a distinctive line between native vegetation and pastoral grazing. The land use also contributes to the definition of the archaeological features which are a key component of this landscape feature.”

Turning to the maunga’s Associative Values, addressed in Section 3.3 of Beca’s report, the important statement is made that:

“The Mauao Historic Reserve Management Plan describes Mauao as:

“..... a significant physical monument of past human habitation, reflecting various settlement patterns, the development of horticulture and the form and function of large earthwork structures. The archaeological landscape within the Mauao Historic Reserve represents the physical remains of approximately 600 years of human occupation and is of local, national and international significance.””

Other, related associations are also described, including the following:

- *“Mauao is highly significant to tangata whenua through ancestral associations, occupation and visual connections. Ownership has been returned to tangata whenua which is also representative of the site’s importance.*
- *Mauao is highly recognisable at a city and national level. This is indicated by the very frequent use of its image in art, regional and local publicity, and institutional imagery and logo.*
- *A navigational landmark, Mauao comprises significant historical associations, within the landscape itself and with its relationship to the City. The first stone jetty was formed on its edge. Numerous archaeological features are located throughout the landscape of Mauao.”*

Although the Section 3 analysis of Mauao is quite brief, it appears to encapsulate key ‘touchstones’ in relation to the physical character, public perception and associative values of the maunga, and its importance to Mt Maunganui, Tauranga and the Eastern Bay of Plenty.

The Waikorire Gateway

Presently, the Waikorire Entrance to Mauao is framed by a number of elements found at the northern end of Pilot Bay off Adams Avenue, including a boat trailer park, toilet block, caravan park and the Mount Hot Pools. The site proposed for palisade fencing and pouwhenua also lies close to the multi-storey apartment complexes at the heart of Mt Maunganui’s northern residential area – directly across Adams Avenue. As stated in the application, the palisade fencing would be located on the steep uphill side of the current Te Ara Tūtanga (base) Track. This area is more immediately framed by a mixture of kikuyu grass cover and pockets of planted flax. Section 3.4.1.1 of Beca’s report also refers to the presence of *“temporary plastic mesh barrier and waratahs to prevent access to the embankment where there appears to be evidence of archaeological features such as middens.”*

This description, together with the analysis found in Sections 3.4.1.1 and 3.4.1.2, highlights the transitional nature of the area at and around the Waikorire site. In addition, Section 3.4.1.3 makes the important point that: *“Waikorire is the traditional land gateway to Mauao. The pā of*

Taumatautakitaki and Te Pae o Para and their respective terraces and cascaded shell midden provide visual clues of the occupation in this area. Waitapu (sacred water) sometimes referred to as Waiparera’s well is located very close to the campground and the site of the proposal.”

In other words, the Waikorire locality has traditionally served the role of a key cultural gateway to and from Mauao. Just as this part of the maunga remains notable for its scattering of archaeologically significant sites, it has – as a whole – retained its significance as a cultural site within the more natural setting and context of Mauao as a whole.



The approach to the Waikorire Entrance / Exit at the end of the Pilot Bay boat trailer parking area and near the adjoining caravan park and hot pools

The Awaiti Platform

In a similar vein, the proposed site for a viewing platform and lookout at Awaiti would also be linked to the current Te Ara Tūtanga (base) Track. It would project out eastwards from just below that track, where some steps and a seat are flanked by an informal trail worn into grass behind a line of pohutukawas and the adjoining shoreline.



The proposed platform site



The proposed platform site, located quite low down on the eastern side of Mauao below the Te Ara Tūtanga Track (Law Creative)

This site is located quite low down on Mauao, close to where those using the ‘base track’ – which circumnavigates the base of Mauao – come close to the CMA; in particular its sequence of volcanic pavement, shoals and outcrops, as well as small sandy coves, at Awaiti. Consequently, the proposed platform would sit between the existing track and shoreline, within a location that is effectively screened from urban Mt Maunganui, together with the more direct track to Mauao’s summit and the Motukauri Track – which climbs more gradually towards that crest. In this regard, Beca’s Landscape Assessment comments that:

“Two small pōhutukawa trees are growing near the base of the embankment near the proposed platform structure. On the upward slope of the track is a steep cut embankment with scattered small pōhutukawa trees and pockets of revegetation planting amongst rank grasses, leading up to the fenced grazed pasture of the lower slopes of the maunga.”

This vegetation and landform would assist with the physical and visual containment of the proposed platform. At the same time, the platform would be located on part of Mauao that is already noticeably disturbed and modified by both structures – primarily the existing base track and steps – and related recreational activity. Conceptually, the proposed platform would connect users of the base track with the nearby sea / moana, and would also help to affirm the cultural values attached to local rock formations, including a gap in the rock outcrops near the shoreline that was apparently used as a canoe landing site in an historic attack on the Taumatautakitaki and Te Pae o Para Pa.

The Water Tank Amphitheatre

Returning to the western side of Mauao, an existing concrete water tank, with associated steel barriers and gates, is located directly adjacent to, and above, the Motukauri Track. In turn, it is backed by a half-ring of pohutukawas above and behind it. The proposed amphitheatre would be located directly downhill of both the concrete water tank and track, near 12 mature poplars and a seat that looks out towards Matakana Island. A proposed bank between the amphitheatre and the track would be planted out to create a screen and backdrop to the informal seating rows, while that same seating would descend in the direction of the nearby harbour channel. Since 2004, stockpiles of soil have been located on a flat platform of land originally created to assist with construction of the water tank, and the amphitheatre would dig into this artificial platform and stockpiled soil.



The proposed amphitheatre site next to the Motukauri Track and TCC water Tank (Law Creative)

According to iwi, the site was historically used for Maori occupation, located close to freshwater sources and the kaimoana found within the Tauranga Harbour’s main entry channel; and as is also explained in Section 3.4.3.3 of Beca’s Landscape Assessment, this location overlooks Ruarapapari Pā and lies close to a series of sheltered beaches and landing points on the edge of the channel.

The False Summit Fencing

Located significantly higher on Mauao’s northern ridge, but still close to the Motukauri Track, the proposed site for palisade fencing on the False Summit (Section 4.4.4.1) *“is located across a sloping portion of the ridgeline, identified by an isolated pocket of dense vegetation, completely enclosed by a wide bend in the gravel track (Motukauri Track) and a straight strip of mown grass which is fenced off to protect the archaeological terrace feature.”* The dense vegetation just referred to comprises both native and exotic plants – from mingimingi to gorse, while native shrubland and rock outcrops dominate most of the surrounding slopes, and ‘manuka shrubland transitioning to pohutukawa forest’ is evident to the south. As a result of both this physical enclosure and the False Summit’s quite isolated location, those exposed to the area of proposed palisade fencing would mainly comprise users of the Motukauri Track.



The proposed area of vegetation clearance and palisade fencing on the False Summit

The False Summit site contains numerous archaeological sites, and it is anticipated that these will be exposed as vegetation clearance occurs across it. According to Beca’s Landscape Assessment, this reflects the locality’s importance as part of the pa found on and near the crest of Mauao – which is reflected in the ‘songs, chants, incantations and formal speeches’ that reference it. As is stated at Section 3.4.4.3 of that report, it is also *“an abode of the spirits of ancestors who lived there. It is a resting place for the koiwi of chiefs and other dignitaries. It is close to the heavens.”*

The proposed palisade fencing sets out to protect both the sites and integrity of the cultural area / landscape associated with this important part of Mauao.

Summary

The description of each site by the Beca team, as outlined above, appropriately describes the physical setting and context for each Non-complying proposal and, perhaps of greater significance in this instance, references the cultural values and significance of each site. It also alludes to the rationale for each structural / installation proposal – with all four proposals firmly linked to the associative-cultural attributes and values of the maunga.

4. Natural Character Effects

Beca’s Landscape Assessment report describes some of the broad natural character attributes associated with Mauao – as a whole – at the beginning of Section 5. These refer to Mauao’s volcanic profile, the bush across it and its rocky shoreline. This is followed by a summary analysis of the natural character values and effects associated with each site and the structures / installations on them,

together with an assessment of temporary (construction) effects. Those natural character ratings – for existing values and effects – are summarised as follows:

Beca Limited Effects Ratings:

	Location / Installation:	Natural Character Values:	Natural Character Effects:
1.	Waikorire Gateway	Low	Very Low
2.	Awaiti Platform	Low-Moderate	Moderate
3.	The Water Tank Amphitheatre	Low	Low
4.	The False Summit Fencing	Moderate	Moderate-High
	Temporary / Construction		Low-Moderate

The rationale for these ratings are found at Sections 5.1.1 to 5.1.5 of Beca’s report. I broadly agree with these ratings, but also consider that:

1. The proposed Awaiti Platform would remain quite small-scale within that coastal environment and would add incrementally to the structures that exist already, rather than being entirely new and different (even with the proposed seating). By and large, it would integrate with its setting, becoming increasingly recessive over time as it timer weathers and the pouhukawas near the platform continue to mature.
2. The effects of the proposed vegetation clearance palisade fencing and pouwhenua on the False Summit would primarily affect an area of ‘mixed’ vegetation that presently contains both weeds and exotic species. It is also an area that is ‘pockmarked’ by areas of past clearance and (accidental) burning, but also by rock outcrops and plinths – as well as the cut and course of the existing footpath to Mauao’s northern summit, together with human activity on it. In my view, the proposed vegetation clearance would have a limited impact on this landscape, while the proposed fencing and pouwhenua would tread lightly on it. As a whole, this area of clearance and fencing occupies a quite small part of Mauao’s coastal environment and, bearing in mind the cultural imperatives of Objective 3 of the NZ Coastal Policy Statement (2010)¹, would have slightly less impact than the Beca’s assessment indicates.

Accordingly, the following table reflects my evaluation of natural character values and effects for the installation sites:

¹

Objective 3

To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by:

- *recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources;*
- *promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act;*
- *incorporating mātauranga Māori into sustainable management practices; and*
- *recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.*

Brown NZ Ltd Effects Ratings:

	Location / Installation:	Natural Character Values:	Natural Character Effects:
1.	Waikorire Gateway	Low	Very Low
2.	Awaiti Platform	Moderate	Low
3.	The Water Tank Amphitheatre	Low	Low
4.	The False Summit Fencing	Moderate	Low-Moderate

5. Landscape Effects

In relation to Landscape Effects, the Beca Limited assessment makes a number of important points that also affect my interpretation of the effects associated with the current application (Section 6.1.1):

1. The proposed installations / structures are to be located where existing modification of Mauao is already readily apparent;
2. The physical separation of the four sites means that they would not be simultaneously visible, although those using Mauao's tracks or travelling around the maunga by boat (or aircraft) could be exposed to several, or all, of the proposed developments sequentially – and therefore cumulatively;
3. All of the proposed installations / structures would be located on sites that are important or meaningful from an associative-cultural standpoint and, in some cases, are near important archaeological sites: indeed, the argument could be put that all of Mauao comprises a cultural / archaeological landscape in which such values often 'compete' with more natural landscape values and are just as important as them – in places, perhaps moreso.

In relation to the last of these points, it is important to note – as Beca reiterate – that the project is iwi-led and that it (p13): *“aligns with the aspirations and opportunities identified in the recommendations of the Mauao Historic Reserve Management Plan resulting in effects on associative values that are not only considered acceptable, but will have a positive effect by way of highlighting and protecting significant sites through cultural art, palisade fencing, and associated interpretive signage.”* Beca's assessment then addresses the effects associated with each Non-complying installation / structure employing analysis from 8 viewpoints located around Mauao – as summarised overleaf:

Beca Limited Effects Ratings:

Viewpoint	Waikoreri Gateway:	Awaiti Platform:	The Water Tank Amphitheatre:	The False Summit Fencing:
1.	Very Low			
2.	Very Low			
3.			None / Positive	
4.			Very Low	
5.		Low-Moderate		
6.		Low		
7.				Low-Moderate
8.				Low-Moderate

Beca’s assessment also addresses Temporary Effects for each site, and provides an Overall Assessment of effects for each site derived from looking at the Biophysical, Perceptual and Associative effects in a composite manner:

Beca Limited Effects Ratings:

	Location / Installation:	Temporary Effects:	Composite Landscape Effects:
1.	Waikoreri Gateway	Very Low	Very Low
2.	Awaiti Platform	Moderate	Moderate
3.	The Water Tank Amphitheatre	Low-Moderate	None
4.	The False Summit Fencing	Low-Moderate	Low-Moderate

Overall, I find the approach adopted a little confusing:

- The composite ‘temporary / construction’ effects identified for Mauao, overall, are described before the individual installations / structures / sites are addressed;
- The composite / overall effects ratings for each site are described prior to analysis of the effects in relation to individual viewpoints and the discussion of temporary effects on a site by site basis; and
- There is no cumulative ‘wrap up’ of what the effects identified mean for Mauao after the individual sites and viewpoints have been addressed.

Moreover, as in relation to the Natural Character assessment, I have some concerns about one or two of Beca’s landscape effect ratings set out above. In particular:

- a. Beca’s assessment of effect places a very strong emphasis on effects driven by modification of Mauao’s ‘natural’ landscape and environment. In this instance, however, recognition of the maunga’s natural heritage and values has to be balanced against its importance as a cultural landscape of considerable value to Tauranga’s iwi. This alters the context within which the effects of the four Non-complying proposals must be considered.

- b. The Awaiti Platform sits within part of Mauao’s coastal margin that is already appreciably modified and subject to human activity. This modification is clearly visible from the sea, as well as on land. Moreover, the platform would be located within a reasonably recessive part of the coastal landscape behind two pohutukawa, and would be visually linked with the adjoining base track, seat and steps. As the platform weathers, it would become increasingly recessive in its own right. Overall, therefore, I consider that it would remain very much secondary to the diagonal cut of the base track – above and behind it – especially in views from the sea.
- c. Just as important, the Awaiti platform would enhance cultural engagement with both the moana and part of an historically significant shoreline, which is significant in terms of landscape’s associative-cultural lens.
- d. While I agree that vegetation clearance of the False Summit could well register as an area of ‘disturbance’ in more direct and close-up views from Motukauri Track, it would be consistent with other areas of clearance, both around the existing summit track and lower down, that are evident when climbing towards Mauao’s crest. At the same time, the terracing revealed by the proposed clearance would ‘tell its own tale’ about the cultural significance of Mauao – a message that is often poorly articulated and expressed at present.
- e. In longer distance views, the proposed fencing and pouwhenua on the False Summit would be scarcely visible at all, while – again – the important function of protecting sites that have both archaeological and cultural significance is ‘positive’ from a landscape standpoint. Indeed, the pouwhenua and Law Creative’s design of the proposed fencing have the potential to reinforce this message. This creates a situation in which such benefits need to be balanced against disturbance of an area that is currently notable for native regeneration, but also weed and exotic species that dilute some of its biophysical value.

Taking these factors into account, it is my view that the proposed installations / strictures would generate the following levels of effect:

Brown NZ Ltd Effects Ratings:

	Location / Installation:	Temporary Effects:	Composite Landscape Effects:
1.	Waikorire Gateway	Very Low	Very Low
2.	Awaiti Platform	Moderate	Low
3.	The Water Tank Amphitheatre	Low-Moderate	None
4.	The False Summit Fencing	Low-Moderate	Low

Based on this revised assessment of effects, it is considered that the effects generated by the four proposals would be of a very low to low (or less than minor to minor) order overall – both in relation to the individual development sites and cumulatively across Mauao.

6. Review Against Relevant Objectives & Policies

Beca Limited's Application Report and Appendix 5 of the Landscape Assessment identify key statutory instruments that are relevant to the current application. Of particular relevance to the proposals addressed in this report, Mauao is identified as an Outstanding Natural feature in the Tauranga City Plan, with its natural science factors and expressiveness (related to its volcanic profile and landform) rated highly, together with its shred / recognised values, Maori values and historical associations. Related provisions include the following:

6A.1.1 Objective – Outstanding Natural Features and Landscapes

The factors, values and associations that define the City's outstanding natural features and landscapes are identified and protected from inappropriate subdivision, use and development.

6A.1.1.2 Policy - Protection of Outstanding Natural Features and Landscapes

By protecting the particular factors, values and associations that make an area an outstanding natural feature and landscape from the adverse effects of inappropriate subdivision, use and development by having regard to:

- a. The character and degree of modification, damage, loss or destruction that will result from the activity;*
- b. The duration and frequency of effect (for example long-term or recurring effects);*
- c. The magnitude or scale of effect (for example the number of sites affected, spatial distribution, landscape context);*
- d. The irreversibility of effect (for example loss of unique or rare features, limited opportunity for remediation, the technical feasibility of remediation or mitigation);*
- e. The resilience of heritage value or place to change (for example the ability of the feature to assimilate change, the vulnerability of the feature to external effects);*
- f. The opportunities to remedy or mitigate pre-existing or potential adverse effects (for example restoration or enhancement), where avoidance is not practicable;*
- g. The probability of effect (for example the likelihood of unforeseen effects, ability to take a precautionary approach);*
- h. Cumulative effects (for example the loss of multiple features or values);*

In addition, Mauao is zoned as Passive Open Space – Conservation, which means that a range of other provisions are also applicable to it, including:

13A.4.6 Objective – Adverse Effects on the Surrounding Environment

Buildings, structures and activities on land zoned Open Space does not adversely affect the surrounding environment's amenity, landscape character, streetscape and/or heritage or cultural values.

13A.4.6.1 Policy - Adverse Effects on the Surrounding Environment

By ensuring that buildings, structures and activities on land zoned Open Space are designed, sited, operated and maintained to address the potential adverse effects:

- a. Of noise and light emissions;*
- b. On the amenity values of the surrounding environment, including its landscape character and streetscape;*

c. On the amenity values of sites, buildings, places or areas of:

- i. Indigenous flora and fauna
- ii. Heritage, cultural or archaeological value.

13A.4.7 Objective – Public Access

Public access, for the recreational needs of the City, to and along the coastal environment, wetlands, rivers and streams is maintained and enhanced.

13A.4.7.1 Policy – Public Access to rivers and streams is provided.

By maintaining and enhancing public access to and along the coastal environment, wetlands, rivers and streams, provided that the adverse effects on the natural character values of those areas is remedied or mitigated.

13A.5 Objectives and Policies of the Conservation Zone

13A.5.1 Objective – Maintenance and Enhancement of Conservation Values

The natural character, ecological and conservation values of the City's Conservation Zone land is maintained and enhanced.

13A.5.1.1 Policy – Maintenance and Enhancement of Conservation Values

By maintaining and enhancing the natural character, ecological and conservation values of land zoned Conservation from the potential adverse effects of subdivision, use and development, by having regard to:

- a. The character and degree of modification, damage, loss or destruction that will result from the activity;
- b. The duration and frequency of effect (for example long-term or recurring effects);
- c. The magnitude or scale of effect (for example number of sites affected, spatial distribution, landscape context);
- d. Cumulative effects (for example loss of multiple features or values);
- e. Need for, or purpose of, the works;
- f. Visual impacts.

Finally, Policy 15 of the NZ Coastal Policy Statement [in accordance with sections 6(a) and (b) of the RMA] requires that natural features and landscapes around NZ's coastline are to be protected from inappropriate, subdivision, use and development by 'avoiding adverse effects on ONFs and ONLs within the coastal environment'. This has clear ramifications for the Non-complying proposals on Mauao.

Taking these various statutory matters into account, the following are my summary findings in relation to relevant landscape and natural character issues:

Issue: *The scale and Magnitude of Effects in Relation to the Character of Mauao*

Analysis: It is my assessment that the proposals for the Waikoreri Gateway and Water Tank sites would be of a limited scale and reflect the already transitional or modified nature of both locations. The proposals for those areas would be consistent with their landscape character and past development or modification within and near them. The

‘gateway’ function of the proposed Waikoreri Entrance would be both positive and important in this regard.

The Awaiti Platform would also be located within part of Mauao’s coastline that has been affected by the physical presence of the Te Ara Tūtanga (base) Track, including the steps and seat connected to it, the swathe of open grassland around it, and recreational activity on this coastal apron. Although the proposed platform would be large and would involve appreciable change when viewed close-up, it would occupy a reasonably recessive location, and would integrate with the existing track development (together with the informal trail across the platform site). Consequently, when viewed at the wider coastline scale – embracing the fuller profile of Mauao and its shoreline – the platform’s effects would be much more limited. Just as important, the proposed platform would give rise to positive cultural effects that significantly counterbalance any adverse effects in relation to the perceived naturalness and intactness of the biophysical environment.

The False Summit proposals would exacerbate some of the ‘patchwork quilt’ landscape patterns evident across Mauao, together with the historical clearance of bush from its lower flanks. However, the area of clearance and around it includes both exotic and weed plant species, while the more artificial elements proposed would only be obvious at a relatively close range. Looking from further afield, they would largely meld with the complex landform and vegetative patterns evident across the maunga. Again, the effects of the proposed clearance and fencing have to also be balanced against the culturally important protection of archaeological sites and the meaningful use of pouwhenua to signal a ‘landscape’ that has very significant cultural value.

Taking all of these matters into account, it is considered that the nature and magnitude of effects arising from all four areas of development reflect the multiple values and character of the maunga. This inevitably includes the iwi-cultural values associated with different parts of Mauao and its attachments with both the Tauranga Moana and Pacific Ocean.

Issue: The Irreversibility of Effect

Analysis: The current proposals have an indeterminate life span. This might be an issue if the effects of the multiple proposals were consistently adverse; however, I don’t consider that to be the case: they are all designed to enhance the cultural landscape values of Mauao.

Issue: The Resilience of Heritage values and Places to Change

Analysis: It is my assessment that the proposals would support Mauao’s cultural values and be as resilient as any human-made structures can be. In this regard, the earth terracing near the TCC water tank may ultimately prove to be more enduring and permanent than the other structures proposed.

Issue: Opportunities for Restoration and Enhancement

Analysis: The same terracing may well help to enhance and offset the past creation of an artificial platform in front of the TCC water tank and the stockpiling of soil (since 2004) on it.

The other proposals would help to protect sites of archaeological and cultural significance, without necessarily enhancing them, although the Waikorero Entrance would help to enhance the experience of entering Mauao's landscape and the Awaiti Platform would articulate the maunga's relationship with the sea / moana. While the proposals do not, therefore, strictly involve biophysical restoration, they would still enhance and help to more clearly express Mauao's cultural and spiritual landscape values.

Issue: Cumulative Effects

Analysis: Cumulative effects have been addressed in this review and are considered to be of a very low to low order overall.

Issue: Effects on the Amenity of Surrounding Areas

Analysis: The proposed developments would have no effects in relation to the amenity of Mt Maunganui's residential area and CBD, or Pilot Bay and its main beachfront. In relation to Mauao itself, the proposals would enhance its heritage, cultural and archaeological values.

Issue: Public Access to the Coast

Analysis: The Awaiti Platform, in particular, would enhance access to Mauao's coastline and sense of connection with the CMA, while its adverse effects on natural character values would be of a low order. Similarly, the Water Tank Amphitheatre would reinforce the sense of connection between both Mauao and the Motukauri Track with Tauranga Moana's main entry channel and Matakana Island, yet having a negligible impact on the maunga's natural character values.

Issue: The maintenance and Enhancement of Natural Character and Conservation Values

Analysis: For the reasons set out above, the Non-complying proposals would, in my assessment, maintain Mauao's natural character values, and by better articulating the maunga's cultural and historic heritage values would enhance its conservation values. In saying this, it is acknowledged that the proposals would result in a very slight loss of naturalness in absolute terms, more specifically around the Awaiti Platform and False Summit. This broad judgement takes into account all of the matters outlined under Policy 13A.5.1.1.

7. Recommendations

Beca's Landscape Assessment Report contains an effects summary, in tabular form, that summarises the effects ratings already described above. It is accompanied by a number of recommendations. The recommendations are limited, but appear to be appropriate from a landscape standpoint.

However, as indicated above, I disagree with some of the report's findings and inferred conclusions in relation to effects. In particular, it is my opinion that the detrimental effects identified by Beca in relation to the Awaiti Platform and False Summit proposals are overstated, and that this arises from an over-emphasis on the degradation of Mauao's natural state and values. In my opinion, those findings do not adequately recognise the modifications that are already apparent around both sites and / or within their wider setting, and – of perhaps more importance – the cultural benefits and positive effects of both proposals.

I have adopted an approach that I consider to be pragmatic in relation to past and current modification on, and disturbance of, Mauao, and have placed greater emphasis on the cultural benefits that I consider would arise from the Mauao Trust proposals. More specifically, it is my assessment that the cultural, heritage and archaeological benefits of the installations / structures sought under the current application would either offset or very nearly offset the adverse biophysical effects and any adverse perceptual effects associated with the Awaiti Platform and False Summit proposals. Cumulatively, all four proposals would enhance the cultural landscape values of Mauao, in my assessment.

Accordingly, it is also my opinion that the Non-complying proposals addressed in this review are consistent with the relevant TCP provisions identified, together with Objective 3 and Policies 13 and 15 of the NZ Coastal Policy Statement, and sections 6(a) and (b) of the RMA.

s 7(2)(a) - Privacy



REGISTERED
LANDSCAPE
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