

Memorandum



To Sarah Trinder
Senior Policy Planner - District Plan, FNDC

From Melean Absolum
Landscape Architect, MALtd

Date 24 September 2025

Dear Sarah,

SUBMISSIONS 530 & 567 - ANDRE GALVIN & VICTORIA YORKE, HARURU

INTRODUCTION

This is my second memorandum responding to the above submissions and follows both an on-line discussion with the submitters and a site visit. The on-line discussion on 28 August was attended by the submitters and their consultant landscape architect Stephen Brown along with you and I, on behalf of Council. I undertook a site visit in the company of the submitters on 16 September.

As well as these interactions with the submitters, I have also been provided with '*Preliminary Assessment of Development Zoning and High Natural Character Overlay*,' a report prepared by Stephen Brown, dated 4 July 2025, which was discussed during our on-line meeting.

I shall describe my observations on the site, including the high natural character overlay, (HNC), prior to reviewing Mr Brown's report. I shall also provide some recommendations on a potential way forward.

SITE VISIT OBSERVATIONS

The majority of the 6.9ha property is covered in native vegetation which is largely re-growth following earlier clearances. There are several tracks through this re-growth which vary in width and frequency of use, judging by the level of re-growth along them.

Immediately north-east of the six properties, numbers 42 to 54 Goffe Drive, is the main track that runs close to and parallel with the rear boundaries of these properties, downhill towards Kaipatiki Creek. It is approximately 3m wide and is bounded on its north-eastern side by lower growing weedy vegetation including gorse, (*Ulex europaeus*), flannel weed, (*Solanum mauritianum*), pampas grass, (*Cortaderia selloana*), jasmine, (*Jasminum polyanthum*), kahili ginger (*Hedychium gardnerianum*) and Taiwan cherry (*Prunus campanulata*), interspersed with dumped garden refuse. This track appears to have been cut or widened between July 2020 and January 2022, from reference to historical aerials on Google Earth. A view looking down the upper section of this track is shown in **Photograph 1** overleaf.

A connection between the main track and the garden of number 42 Goffe Drive has also been cut, as shown in **Photograph 2** overleaf. At the western end of the main track is an area of fill, see **Photograph 3**, which has been pushed over the slope below the houses, sometime between October 2016 and December 2018, again, judging from Google Earth.



Photograph 1 Looking along the upper portion of the main track towards Kaipatiki Creek



Photograph 2 The cut track between number 42 and the main track.



Photograph 3 The fill area at the top of the main track, north-east of 44 Goffe Drive

This main track continues downhill from the eastern corner of number 54 Goffe Drive turning first to the south, towards Puketona Road and then east towards Kaipatiki Creek before dropping down to the flat area adjacent to SH11, as illustrated in the photographs below.



Photograph 4 Looking down the main track where it turns south (to the right)



Photograph 5 The main track dropping steeply down to Puketona Road level

A secondary track, which from, Google Earth historical aerials, appears to pre-date the main track, runs roughly parallel with the coastal edge, between 25m and 50m from it. It curves from the flat area next to Puketona Road north and westwards to a point below 42 Goffe Drive where it turns south-westwards and climbs the hill to join the main track next to the area of fill. This track is both narrower and less well used than the main track, judging by the extent of vegetation on and around it. Similarly, a narrow and overgrown minor track runs between the main track and the secondary track roughly parallel with Puketona Road, meeting the main track close to number 54 Goffe Drive.

The flatter area beside Puketona Road and Kaipatiki Creek has recently been earth-worked. As can be seen in the current Google Maps Street-view, dated September 2024, silt fencing has been erected along the stream edge and the area appears to have been track-rolled. The silt fencing remains in place today but grass and weeds have colonised the earth-worked area, along with manuka / kanuka seedlings.

HIGH NATURAL CHARACTER OVERLAY

Although I responded to the submitters' request for the reduction in extent of the HNC on their property in Hearing 4, the site visit has enabled me to consider those parts of the site I had not seen before, in terms of the appropriate extent of HNC overlay.

My recommendation to the Hearing Panel at Hearing 4 was as shown in **Figure 1**, below.



Figure 1 My recommendation for reduction of HNC at Hearing 4

I note that a different aerial photograph formed the base map of the PDP maps when the Hearing 4 map was prepared, from the aerial base map available today. As can be seen in Figure 1 above, vehicle tracks encircled an area of vegetation in the centre of the blue line area. That vegetation does not appear on the aerial below, taken from the PDP maps in September 2025.

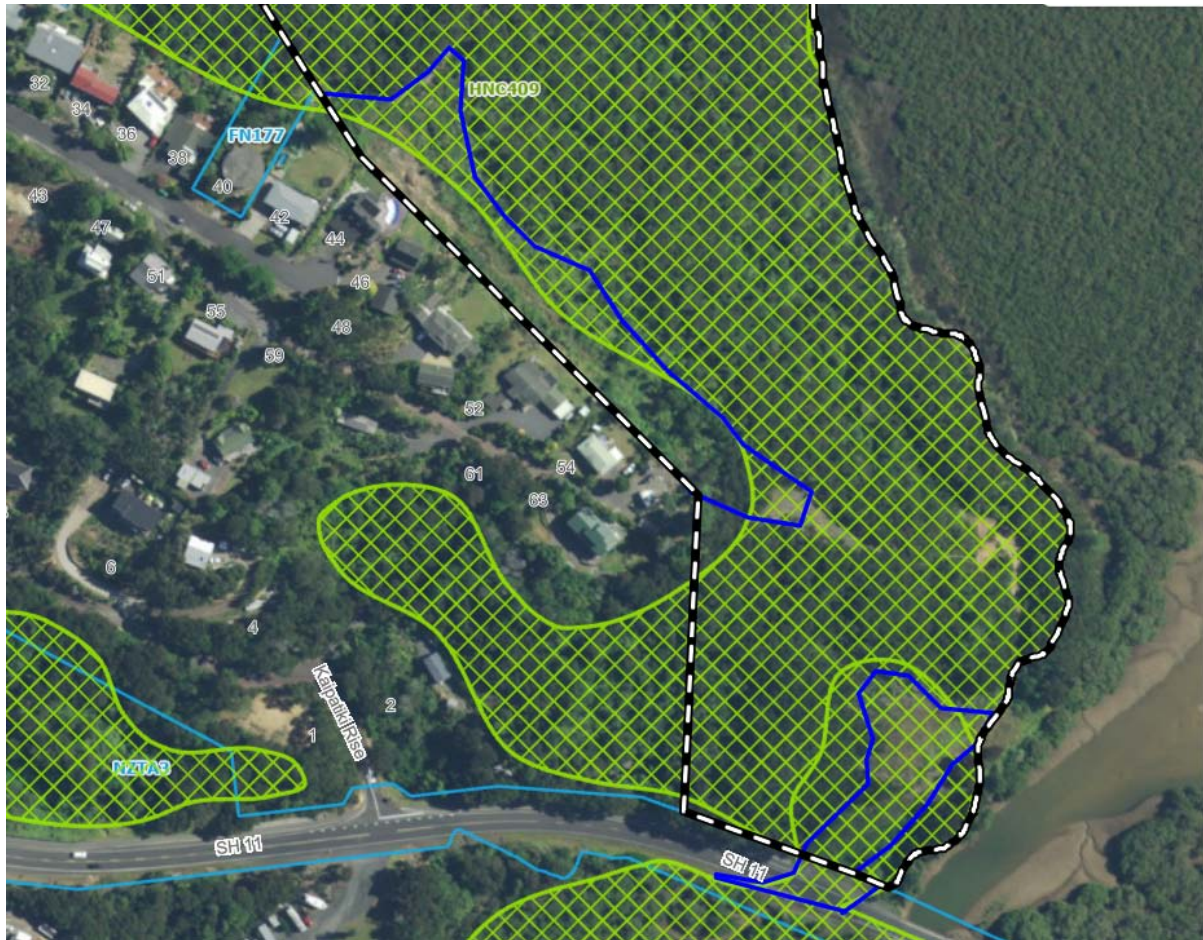


Figure 2 My revised recommendation for reduction of the HNCs 409 and 422

HNC 409, as shown above, does not extend up to the boundary of the submitters' property (marked by the black and white line) on the western boundary. Nevertheless, I believe the HNC overlay could be moved back further from that boundary, as shown by the blue line in **Figure 2** above.

I had already recommended a reduction in the extent of HNC 422 (to the south of HNC 409) as shown in **Figure 1** above. **Figure 2** shows a minor amendment to that recommendation which better follows the line of the current edge of the vegetation and also removes the small stub of the overlay where it crosses SH11.

MR BROWN'S REPORT

Mr Brown points out at the beginning of his report that the native regrowth across the property is "now extensive and cohesive." He goes on to state "*I agree with Mike Farrow's opinion¹ that it would be extremely difficult to challenge the Natural Character overlay proposed in the Far North District Council's Proposed District Plan, which is spread across much of the site.*"

The report goes on to describe various parts of the site and the tracks and vegetation found there. On the basis of that analysis he makes five recommendations that are encapsulated in his Figure 1, shown below as **Figure 3**.



Figure 3 Mr Brown's Figure 1 showing his zoning and HNC overlay proposals

¹ Part of an earlier report prepared for the submitters by Mike Farrow of Littoralis Landscape Architecture is also quoted by Mr Brown.

Mr Brown recommends the expansion of the "existing Residential Zone next to 42-63 Goffe Drive" in Areas 1 and 2 shown on Figure 3 above. I take this to mean expanding the General Residential zone (GRZ) in the PDP. During our on-line discussion, Mr Brown confirmed that he anticipated approximately 3 house sites being suitable in Area 1, with a couple more in Area 2.

Mr Brown goes on to recommend Rural Residential zoning (RRZ) for two small areas identified as Areas 3 and 4 in Figure 3 above. Area 3 occupies a strip of land either side of the secondary track, described above, close to the coastal margin of the property, while Area 4 occupies steep kanuka clad slopes above Puketona Road that can be seen on the right hand side of **Photograph 5** above.

Finally, Mr Brown recommends that the HNC cover the whole property, except for Areas 1 and 2, such that the RRZ Areas 3 and 4 are within the overlay. Despite this recommendation in the report, Mr Brown's Figure 1, **Figure 3** above, is notated such that Area 4 is **outside** the HNC overlay. It is thus not clear exactly what is proposed. No zone has been recommended for those parts of the property outside Areas 1-4 on **Figure 3**.

I note that Mr Brown makes suggestions such as "*subject to conditions to ensure that it (development) remains low-key and visually recessive.*"² It is not clear how Mr Brown anticipates conditions can be set during the hearing of a zoning submission to a District Plan review.

I make the following response to Mr Brown's report and recommendations.

High Natural Character Area

Figure 2 above illustrates the extent of reduction of the two HNC overlays that I find appropriate. Mr Brown's Area 1 extends further from the south-western boundary of the property than I think appropriate. While it is difficult to identify the precise edge of the disturbed and weed-filled area from aerial photography, I think Mr Brown's line goes beyond that edge to varying degrees along this boundary.

Additionally Mr Brown has extended his Area 1 south from the end of the Goffe Drive properties, down towards the Puketona Road boundary, where it meets his Area 4. This area is quite steep and clad in primarily kanuka re-growth. It is not clear from Mr Brown's description why he has extended his Area 1 so far south.

Area 1 also extends further east than I think appropriate, encompassing a recently cleared area³ at the junction of the main track and secondary track. This area is visible in the mid ground of **Photograph 4** where the yellow flowers of the native kumerahou (*Pomaderris kumeraho*) can be seen colonising the bare ground. I have included the intersection of the two tracks in my recommended area to be excluded from the HNC, but do not believe it should extend as far east as Mr Brown has shown in **Figure 3**.

² Paragraph 4, page 7 of Mr Brown's report

³ This cleared area is not visible on Google maps aerial but is visible on the PDP base map

Similarly, as already discussed, Area 2 extends beyond where I would recommend the edge of the HNC should be drawn. Mr Brown has taken it some distance north along the secondary track, to the point where the minor track heads uphill to join the main track. I do not think the overlay should be reduced to this extent as the track is narrow and with appropriate vegetation management, the native re-growth already apparent would flourish.

Proposed Zones

I understand that Mr Brown proposes zoning Areas 1 and 2 GRZ, although, as noted above this is not explicit in his report. For the reasons given above in relation to the HNC overlay, I could only support that recommendation as far as my blue line in Figure 2 above, for Area 1.

For Area 2, I have concerns that the GRZ zoning may turn out to be inappropriate given the flood hazards⁴ that exist across much of the flat area next to SH11. This is not my area of expertise but I am aware of the mapped Natural Hazards and Risks overlay over this part of the site, which Mr Brown acknowledged during our on-line discussions.

As already described, Mr Brown proposes the RRZ in two small areas of the site. Area 3 is along part of the secondary track above the mangroves in the eastern part of the site, while Area 4 is on the steep kanuka-clad slopes above SH11. In my view, development in Area 4 would require significant earthworks and vegetation removal as a result of the steep slopes involved. Although Area 3 does not pose the same slope challenges, development would involve vegetation removal and earthworks to create both the access to and any house sites. Additionally, it would be very unusual to have such small areas of RRZ, in my experience.

A RECOMMENDED WAY FORWARD

From my involvement with a number of other zone change submissions to the PDP, I am not convinced that what the submitters need to achieve their current aspirations for the site⁵ is rezoning of the whole property.

Given the particular characteristics of the site, it might be better to apply either a Precinct or Development Area overlay to the site, to enable quite limited development to be undertaken in specific locations, alongside the implementation of a comprehensive vegetation management plan. Such an approach would enable the identification of a handful of suitable house sites, probably a maximum of five, within the property. Such a plan would need to be supported by sufficient evidence that access and servicing of such sites could be undertaken without creating adverse landscape (or other environmental) effects.



Melean Absolum

Dip LA FNZILA

25 September 2025

⁴ Coastal Flood (Zone 1, 2 and 3) in PNP maps

⁵ I acknowledge that it has not been made clear what exactly the submitters are seeking, in terms of development of the site, with four different subdivision layouts put forward in submissions and subsequent expert evidence.