

Hannah Ayres for Hawthenden Ltd – Summary of Evidence, 24 May 2017

Upper Clutha Mapping (Wanaka Urban Fringe) – Hearing Stream 12

1. I have been engaged by Hawthenden Ltd to provide landscape evidence in relation to two separate proposals. The first proposal assesses the current position of the Outstanding Natural Landscape (ONL) boundary of the Mt Alpha Range and suggests a more appropriate alignment of this. The second proposal assesses land zoned '*Rural General – Visual Amenity Landscape (VAL)*', and suggests rezoning to *Rural Lifestyle Zone (RL)*, *Rural Residential Zone (RR)*. It is important to note that each proposal, while interrelated to some extent, is independent of each other.
2. In my evidence, I refer to a comprehensive landscape assessment of Hawthenden Farm that I prepared in 2015. This assessment provides a thorough description of the farm, accompanied by site photos that illustrate the landscape character of the farm and its context. The assessment goes on to evaluate the current position of the ONL boundary (as shown in the Proposed District Plan (PDP)) that is the result of a '*finely balanced decision*' made by the Environment Court in 2002 (C73/2002), and suggests a more appropriate alignment that excludes the Alpha fan. It also identifies those areas of Hawthenden Farm that I believe are able to be rezoned for living opportunities while adhering to the Objectives and Policies of the PDP.
3. Ms Helen Mellsop has provided s42a evidence and rebuttal evidence responding to the Hawthenden Farm proposals on behalf of QLDC. In her s42a evidence, Ms Mellsop disagrees with the proposed ONL boundary position and believes it should remain generally as it is shown in the PDP. Ms Mellsop does not oppose rezoning of Areas A and C from Rural General zone to RL zone, and suggests RL zone instead of RR zone in Area B. In her rebuttal evidence, Ms Mellsop stands by her original position on all matters and highlights areas of my evidence that are perhaps overstated and incorrect. I summarise our opposing and agreeing positions below.

ONL Boundary Alignment: To include or exclude the Alpha fan?

4. Ms Mellsop and I agree that the ONL line is inaccurately drawn across Hawthenden Farm on the PDP planning maps, however we disagree on the general alignment of ONL boundary. Ms Mellsop believes the ONL boundary should generally remain in its current position to include the upper terrace of the

Alpha fan landform. I assess the entire fan landform to have a moderate to low level of natural character due to moderate to high levels of modification. While I consider the landform is legible, I don't believe the geomorphological characteristics of the landform are particularly unique within the region. It is therefore not natural or outstanding enough to meet the ONL criteria. I believe classifying landscapes such as this, as ONL, degrade the concept of ONL and dilute the significance of those landscapes that are truly Outstanding Natural Landscapes.

5. In my opinion, the Alpha fan should be excluded from the Alpha Range ONL and zoned RLC in the PDP. I believe the ONL boundary should follow an obvious change in topography, geology, land cover and land use between the two distinct landscape character areas of the Mt Alpha Face and the Alpha fan. Please refer to the images attached to this summary which clearly show this distinction.
6. It appears the differing views between Ms Mellsop and I stem from an underlying discrepancy around the degree of naturalness that should (or should not) be required of a landscape in order for it to be classified as an ONL. I believe an ONL needs to have a high level of natural character to be classified as ONL. Ms Mellsop does *'not agree with the premise that a landscape must first achieve a certain grade on a scale of naturalness before it can be assessed for outstandingness...'*
7. Under the RMA a landscape does not have to be unmodified to be natural, just relatively unmodified. In assessing the landscape, the issue most often, is the degree of the natural component compared to the degree of human modification, and the balance of dominance of one over the other. Following this, it is my understanding that a number of landscape studies (Christchurch City Landscape Study 2015, Eastern McKenzie Basin Landscape Study 2013), along with Court decisions, adapt a threshold approach to the evaluation of the landscape, similar to the one I use in my assessment. An example of this is the Interim Decision for Plan Change 13 for the McKenzie Basin in which the degree of naturalness necessary for a landscape to be an Outstanding Natural Landscape is discussed by Judge Jackson.
8. In her rebuttal evidence, Ms Mellsop opines that in my evidence I have overstated the current restrictions of farming activities within an ONL, and therefore such restrictions should not be a reason to re-assess the ONL boundary. Ms Mellsop's clarification of the rules in the ODP and PDP is in fact correct; there are no

particular restrictions stated on the planting of shelter belts or other horticultural and agricultural uses within ONLs, so long as they comply with site standards.

9. I think it is fair to acknowledge that controls over the location, size and appearance of farm buildings within ONL's are in fact more restrictive than in the Rural Landscapes (RLC) zone. For example, a permitted farm building in an ONL is restricted to no more than 100m² in ground floor area, whereas a permitted farm building within a RLC is allowed up to 300m². Any farm buildings that exceed the size, density, and height standards for ONL (which I would imagine many practical farm buildings would easily exceed) are a Restricted Discretionary activity and are subject to the Assessment Matters under 21.7 of the PDP with regard to landscape character and visual amenity (ie. subjective assessment matters and a costly consent process, most likely requiring a landscape and visual assessment).

10. At para 3.33, Ms Mellsop writes:

'In my view the ONL classification does not unduly restrict farming use of the land (...). I consider that the PDP would not result in any meaningful increase in restrictions on farming activities.'

I think what Ms Mellsop is saying here could be used to strengthen my argument that the Alpha fan should not be an ONL. Unlike many ONLs of the region where intensive farming is not suitable for practical reasons (i.e. mountains, lakes and rivers), further buildings, vineyards, crops, shelterbelts, irrigation and earthworks are farming practices that are very likely to occur on the Alpha fan. If the ONL classification of the Alpha fan does not restrict these farming activities, what is the point of protecting this landscape as an ONL? Would the existing landscape and visual amenity associated with this landscape not be equally protected as RLC?

11. As per Section 6(b) of the RMA¹, ONLs are '*matters of national importance*' which must be '*protected from inappropriate subdivision, use and development*'. This is given effect to under Objective 6.3.4, Policy 6.3.4.2 in the PDP, which recognises that many ONLs include working farms, and that viable farming activities may modify the landscape, provided the quality and character of the landscape is not adversely affected. The Alpha fan is a landscape that lends itself to intensive farming practices. As a result, it has been cultivated for more than 100 years and now has a strong *pastoral* character. Although planting of exotic shelterbelts or vineyards and the construction of small farm buildings and tracks are seemingly permitted activities within ONLs under the PDP, they are activities that would, in

¹ Resource Management Act, 1991

my opinion, add to the pastoral character of the Alpha fan and continue to adversely affect natural character.

Rezoning

12. I propose, and Ms Mellsop concurs, that there are areas of Hawthenden Farm's lower terraces that could absorb Rural Lifestyle (RL) zoning, without significant adverse effects on rural character and visual amenity values of the surrounding landscapes. These areas are shown as Area A and C on Sheet X of Appendix X. RL zone allows for one residential unit per hectare with an overall density of one residential unit per 2 hectares across a subdivision.
13. Area B is an approximately 15ha area of gently sloping land connected to the end of Studholme Road, currently zoned RLC in the PDP. I have advised Hawthenden Ltd that Rural Residential (RR) zoning would be the most appropriate zoning for this area. Ms Mellsop disagrees with me, and suggests RL zoning would be more appropriate as she believes it would achieve a higher level of rural character (than the RR zone), which would result in a '*continuous buffer of rural living character along the southern side of Studholme Road*'.
14. I remain of the opinion that RR zoning would be the best use of this land, as the slightly higher density (than what is required in the RL zone) could be achieved without compromising the rural character of the peri-urban zone on the edge of the urban growth boundary. The intention of the RR zone is to '*provide living opportunities on the periphery of urban areas...²*'. The zone allows for development density of up to one residence every 4000m², while giving the council control over the '*bulk and location, colour and lighting standards, and where required, design and landscaping controls imposed at the time of subdivision.*³' I believe these controls would be sufficient to maintain rural character in this area, however Ms Mellsop raises concerns (in para 3.39 of her rebuttal evidence) over the provisions of the PDP RR zone, and the fact they do not provide certainty that covenants or conditions would be imposed. This is more a planning issue which I will leave to the planning experts to discuss.

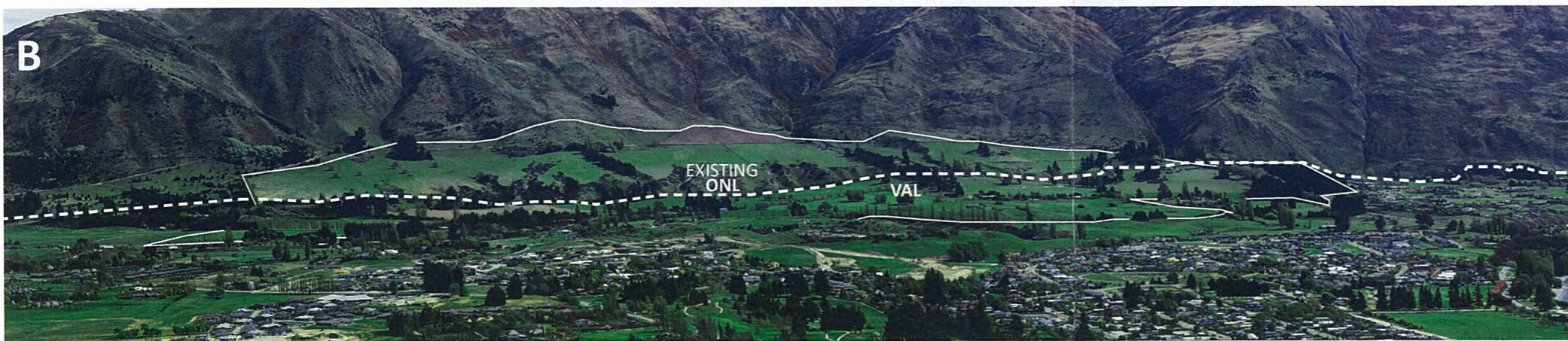
² QLDC PDP_August 2015_Chapter 22_ 22.1 Zone Purpose

³ *ibid*_Rural Residential Zone



EVIDENCE SUMMARY ATTACHMENT

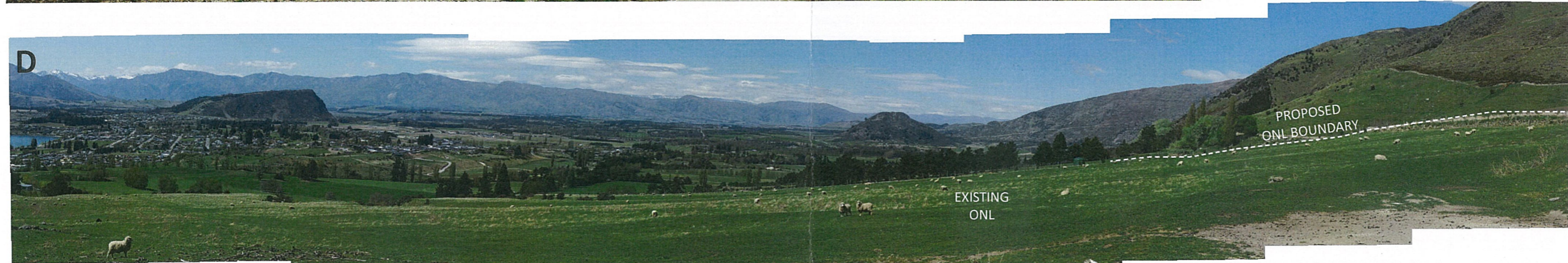
Photograph A - View from Mt Iron overlooking Wanaka toward the Mt Alpha Range. Hawthenden Farm is visible at the base of the Mt Alpha Face. The Alpha Fan is clearly greener than the Mt Alpha Face (due to exotic pastures).



Photograph B - A zoomed in view of photograph A above to show the location of the Hawthenden Farm boundary and the existing ONL boundary. The lower terraces of the Alpha Fan are classified as VAL in the ODP.



Photograph C - View from Cardrona Valley Road (near Oakridge Resort) looking toward the Mt Alpha Range. The proposed ONL boundary is indicated as a dashed line along the clear change in topography (gradient and texture), geology, land cover and type of farming activity.



Photograph D - View standing at the top of the Alpha Fan (below the turnip paddock), clearly demonstrating the pastoral character of Hawthenden Farm and the obvious change in gradient that exists along the interface between the Mt Alpha Face and the Alpha Fan, where in my opinion the ONL boundary should be located.