

**General Question:**

1 - Much of your evidence covers the exclusion of natural character and natural values in relation to landscapes throughout the policies and landscape assessment matters within Chapters 21 to 23 (in particular) in the PDP. If explicit reference to natural character and natural values was inserted (as is consistent with Part II of the RMA), would this satisfy your concern in relation to these parts of your evidence?

Answer:

1 – Adequate inclusion would provide considerable improvement. However there are other deficiencies. Even the Strategic Directions Objective 3.2.1.4 addressing farming does not recognise the need for sensitivity to natural values. Other chapters, particularly Chapter 6 Landscapes, require substantial amendment to provide an adequate framework. Then amendment is required in the methods, particularly the assessment matters, to provide for their implementation.

**Questions Related to Specific Paragraphs:**

Paragraph 30 – Last sentence - “However, for much of the Rural zone, farming is not appropriate.”

2 - In what way do farming activities contribute to the landscape being the way that is?

Farming contributes variously to the character of the District. From dairy farming with pivot irrigation and fodder crops, the lifestyle blocks resulting in intensified built character and plantings, the orchards and tree crops, the housed production, the feed storage systems, and the extensive pastoral mountain blocks, they all contribute to the way the landscape is. They are all “farming” and all have very different impacts.

Parts of the Plan appear to assume “farming” is analogous to broad-scale grazing. However farming occurs at all scales and can involve varying change in land character, vegetation, structures and buildings. Different forms of farming can completely transform landscape character, scale and lessen or remove naturalness. The District involves a considerable spectrum of land types and landform units, hence of soils and micro-climates, that enable a very varied raft of farm activities to occur. The potential for different forms of farming to dramatically alter the landscape needs to be recognised in terms of objectives, policies and methods, including considerations such as for permitted baseline.

3 – If farming is not appropriate in much of the rural zone, please identify those areas where it is and is not appropriate?

This question perhaps assumes farming = grazing, which I suggest is an inappropriate interpretation appearing to permeate the Plan. Farming is likely inappropriate in the National Parks, other conservation areas and water bodies. These cover much of the District. For the rest of the non-urban District, whilst broad-scale grazing may be appropriate, the various forms of farming as noted above are certainly not necessarily appropriate. The very important lower mountain slope, valley floor, isolated mountain, outwash and moraine country which contribute naturalness to the District, and their legibility is so important to the landscape resource of the district, are highly vulnerable to farm use change that alters landscape character, scale and naturalness.

4 – If farming not appropriate in much of the rural zone, what activities do envisage being appropriate in those areas?

Broad-scale grazing (particularly sheep grazing) is typically appropriate in the non-urban parts of the District that are neither protected areas nor water bodies, however different or more intensive farm activities can have significant adverse effects on the landscapes of this District, whether recognised as ONL/F or not.

Paragraph 47

5 – What do mean by “test”?

A “test”, that is, in application of the assessment matter, “shall be satisfied” that.

Paragraph 51

6 – Who is Scott Barr?

Apologies. Craig Barr.

Paragraph 52 – last sentence

7 – “Assessing landscape as per the 4<sup>th</sup> Schedule” – please clarify what is meant by this?  
Considering Schedule 4, S.2 subject to the plan provisions, in preparing any AEE,  
addressing (b) any physical effect including any landscape or visual effects.

Paragraph 53. ONL buffers.

8 - Can you give us some examples of how 'buffer landscapes' can be identified and protected on the edges of ONL's?

In these grand landscapes, narrow buffer strips are not adequate. The VAL in the ODP were originally identified as buffer landscapes to the ONF/L. It would be appropriate to address the entire new Rural zone as a buffer between non-rural and ONF/L. Adequate landscape buffer provisions therefore need to be included in the Rural zone.

9 - Is it a standard off set, as you have referenced from the King Salmon case, or do we need another category of landscapes?

No, a setback distance would not be adequate. The entire Rural zone should be addressed. No additional landscape category is needed.

Paragraphs 54-55 – Rural Character.

10 - Are you able to help us by listing the elements you consider make up rural character?

I don't have a list at hand. Openness, naturalness, scarcity of structures/buildings, landform legibility..... I would be happy to help further, iteratively.

Di Lucas

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