

21.22.24 PA ONL Lake McKay Station & Environs: Schedule of Landscape Values

General Description of the Area

The Lake McKay Station and environs PA is located on the northern shoulder slopes of the Pisa/Criffel Range, extending from the Criffel Diggings Track near Mount Barker to the true right bank of Sheepskin Creek in the east. The northern boundary of the PA is defined by the toe of the mountain range or the northern crest of the Luggate Creek gorge and takes in schist landforms (Knoll A3KV) north of Luggate Creek and east of Sheepskin Creek. To the south, the PA extends to landforms that visually contain the Upper Clutha Basin (at around the 700 to 1100m contour) when viewed from proximate areas of the basin floor.

Physical Attributes and Values

Geology and Geomorphology • Topography and Landforms • Climate and Soils • Hydrology • Vegetation • Ecology • Settlement • Development and Land Use • Archaeology and Heritage • Mana whenua

Important landforms and land types:

1. The Pisa/Criffel Range: the westernmost and highest element of the characteristic 'basin and range' fault block landscape that stretches across Central Otago. At the northern end of the range, the PA takes in a lower ice-eroded shoulder that defines the southern enclosure of the Upper Clutha basin. Within this shoulder, moraines form smoother surfaces between rocky outcrops and hummocks, and the deeply cut gullies of Luggate, Alice Burn, Tin Hut, Dead Horse and Sheepskin creeks dissect the landscape in a south-west to north-east direction. The lower margin of the shoulder, south and east of Luggate, has ice-scoured terrain with rock exposures and fluvially formed escarpments and terraces leading down to the basin floor.
2. Knob A3KV: a low but prominent ice-scoured schist and moraine knoll with numerous rock outcrops. The smoother moraine slopes of the knoll are outside the ONL.
3. Luggate Creek gorges: steeply incised rocky gorges in the upper reaches of the creek and separating the mountain shoulder from Knob A3KV.

Important hydrological features:

4. The series of creeks flowing south-west to north-east from the Pisa/Criffel Range across the ice-eroded northern shoulder. The largest of these is Luggate Creek, with its major tributaries the Alice Burn (Fall Burn) and Tin Hut Creek. Further to the east are Dead Horse Creek and Sheepskin Creek, which join on the flats and flow directly to the Clutha River Mata-Au Mata-au.
5. The water courses within the valley provide habitat for longfin eels, kōaro, upland bullies and Clutha flathead galaxias (nationally critical) and spawning habitat for brown and rainbow trout.

Important ecological features and vegetation types:

6. Particularly noteworthy vegetation types include:
 - a. Shrubland and remnant forest in the lower gorge section of Luggate Creek, including remnant silver beech, Hall's totara, broadleaf and locally uncommon shrub species. Luggate Creek is an important spawning habitat hampered by the spread of willow in the lower reaches.
 - b. Dense regenerating kānuka-dominant shrubland in the Alice Burn (Fall Burn) and to a lesser extent in the other creek gullies. Other species associated with the shrubland include matagouri, native broom, *Coprosma propinqua*, *Coprosma crassifolia* and *Olearia lineata*;

Commented [JH1]: OS 77.32 Kai Tahu ki Otago
OS 188.32 Te Rūnunga o Ngāi Tahu

Commented [JH2]: OS 115.13 Otago Fish and Game Council

- c. Grey shrubland, bracken and regenerating kānuka on rocky areas and escarpments unsuitable for improved pasture, adjacent to the gullies, and on the steeper slopes above the ice-eroded shoulder;
 - d. Scattered Significant Natural Areas protecting representative examples of the vegetation types listed above.
7. Other characteristic vegetation types are:
- a. Small scale radiata pine plantations and wilding spread on the lower escarpments close to Luggate;
 - b. Rough low producing pasture with scattered sweet briar, matagouri and kānuka on steeper slopes and hummocky land;
 - c. Irrigated improved pasture and lucerne cropping on smoother moraine surfaces and terraces between the creek gullies;
 - d. Willows lining lower Luggate Creek closer to Luggate township.
8. Valued habitat for skinks and geckos, a wide range of invertebrate species and native birds (including New Zealand falcon, Australasian harrier, South Island tomtit, grey warbler, fantail, silvereye and black shag).
9. Plant pest species include wilding conifers, sweet briar, tussock hawkweed (*Hieracium lepidulum*) and crack willow.
10. Animal pest species include rabbits, hares, pigs, goats, stoats, possums, rats and mice.

Important land use patterns and features:

- 11. Predominant land use is sheep, beef and deer farming on freehold land at Lake McKay and Criffel Stations and at 191 Luggate Cromwell Road (Sheepskin Creek area). The smoother undulating glacial till plateaus on Lake McKay Station and 191 Luggate Cromwell Road are generally irrigated and support more intensive grazing and lucerne production. Hummocky land and steeper slopes support lower intensity grazing (currently with deer on Criffel Station). Mature radiata pine forestry is present on the lower escarpment faces behind Luggate township.
- 12. Earthworks and built modifications are generally limited to fencing, farm tracks, sheepyards and a farm airstrip. Rock outcrops have been removed in some areas to facilitate cropping. There is a consented woolshed and two consented residential building platforms on the northern part of the Tin Creek plateau, two 7-8 hectare rural living lots in the north-eastern corner of the PA and water supply tanks for Luggate immediately above the township. District electricity lines cross the eastern third of the PA.
- 13. Commercial recreation activities, including farm and gold diggings tours, are undertaken on Criffel Station.

Important archaeological and heritage features and their locations:

- 14. Rich history of late 19th century gold mining and early European high-country farming. More than 28 archaeological sites including water races, wing dams, tailings, diggings, mine drives, hut/tent sites and rock shelters; pack tracks accessing the diggings, including the Criffel Diggings Track and an old track from Luggate between Dead Horse Creek and Alice Burn.

Mana whenua features and their locations:

- 15. The entire area is ancestral land to Kāi Tahu whānui and, as such, all landscape is significant, given that whakapapa, whenua and wai are all intertwined in te ao Māori.

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Associative Attributes and Values

Mana whenua creation and origin traditions • Mana whenua associations and experience • Mana whenua metaphysical aspects such as mauri and wairua • Historic values • Shared and recognised values • Recreation and scenic values

Mana whenua associations and experience:

16. Kāi Tahu whakapapa connections to whenua and wai generate a kaitiaki duty to uphold the mauri of all important landscape areas.

Important historic attributes and values:

17. Associations with late 19th century gold mining, with physical evidence of mining activities and historic diggings. Mining within the PA and on the upper Criffel Range in the 1880s and 1890s was part of the last gold rush in Otago.
18. Associations with early high country pastoral farming, including evocative place and feature names.

Important shared and recognised attributes and values:

19. Valued as an integral part of the distinctive and visually prominent southern enclosure of the Upper Clutha Basin, and for its contribution to the sense of place and identity experienced by locals and frequent visitors.

Important recreation attributes and values:

20. Farmstay, farm and gold diggings tours at Criffel Station.
21. Limited public access, except for informal access along the Luggate Creek and Alice Burn marginal strips. Potential for improved walking access along Luggate Creek to the Luggate Creek and Fall Burn reserves.

Perceptual (Sensory) Attributes and Values

Legibility and Expressiveness • Views to the area • Views from the area • Naturalness • Memorability • Transient values • Remoteness / Wildness • Aesthetic qualities and values

Legibility and expressiveness attributes and values:

22. History of extensive pastoral farming has resulted in an open character and highly legible landform, reinforced by the pattern of deeply cut stream gullies and associated indigenous vegetation. The relative openness of the upper slopes, hummocky areas and moraine plateaus allows the processes of land formation to be easily perceived. The landscape is clearly expressive of the uplift, glacial and fluvial processes that have formed it.

Particularly important views to and from the area:

23. Limited public accessibility means that closer views of the PA are generally limited to the lower escarpments and mountain slopes adjoining the Upper Clutha Basin floor. The PA is however widely visible from more distant vantage points across the basin, including Kane Road, Luggate-Tarras Road (SH8A), Wanaka-Luggate Highway (SH6), Mt Barker Road, Ballantyne Road and Mount Iron. The eastern part of the PA, including Criffel Station and Knob A3KV is visible from viewpoints near Wānaka, and the hummocky or craggy topography with a mosaic of patchy grey shrubland and kānuka is a coherent and highly natural mid-ground to the higher peaks of the Pisa Range. North of the Clutha River Mata-au, expansive views of the entire PA are available from Kane Road and surrounding areas. The rough

vegetation-covered upper slopes, escarpments and stream gullies contrast with the colour and texture of improved pasture on the moraine plateaus, enhancing the legibility of the landscape and providing visual complexity and interest. From these viewpoints the PA is a continuous part of the mountainous enclosure of the basin.

24. Much of the PA is also visible from parts of the Pisa Conservation Area high on the Pisa Range and from the Deep Gully and Grandview Ridge Tracks to the east across the Clutha valley.

Naturalness attributes and values:

25. Overall the PA is perceived as having a high level of naturalness. There is a low level of human modification (in the form of irrigated improved pasture, fences, tracks and occasional buildings) that is largely confined to the smoother moraine plateau and alluvial terraces. Natural patterns and process are dominant across the majority of the PA and are particularly strong in the regenerating kānuka woodland and shrubland areas, and on the steeper slopes. Rocky outcrops and spectacular rocky gorges and gullies add to perceptions of naturalness.

Memorability attributes and values:

26. The memorability of the PA as part of the Pisa/Criffel range, enclosing the Upper Clutha basin to the south and contrasting strongly with the long horizontals of the basin outwash plain;
27. The spectacular rocky gorges of Luggate Creek, although these are not currently widely experienced by the public;
28. The distinctive pyramidal form of Knob A3KV, as viewed from Mount Iron and SH6, particularly on the eastern approach to Luggate;
29. Large rock outcrops adjacent to SH6 at the eastern end of Luggate are a memorable local landmark.

Transient attributes and values:

30. Important transient attributes include the play of light on the open landforms, changing snow cover, the changing colour of pasture vegetation and crops across the seasons, and the presence of stock and wildlife.

Remoteness and wildness attributes and values:

31. A strong sense of remoteness as a consequence of the very low level of domestication and human activity in most parts of the PA.

Aesthetic attributes and values:

32. The PA is predominantly experienced from outside its boundaries (although this may change if public access to Luggate Creek and Alice Burn is improved), and its aesthetic attributes therefore mainly relate to the views available from the floor of the Upper Clutha Basin and elevated places around the basin.
33. Specific characteristics contributing to aesthetic values include:
 - a. The pattern of ice-eroded moraine plateaux dissected by deep rocky kānuka-clad gullies;
 - b. The spectacular Luggate Gorge, with its steep rough, rocky cliffs and dense kānuka woodland;
 - c. The high level of perceived naturalness and remoteness, with very little built infrastructure (other than farm roads) visible from outside the site;
 - d. At a finer scale, the following aspects contribute to the aesthetic appeal:
 - i. the predominance of regenerating vegetation;

- ii. the contrast between the colour and texture of the intensively farmed plateaux/terraces and the steeper slopes, hummocks and gullies.
- iii. the play of light and shadow on the landform.

Summary of Landscape Values

Physical • Associative • Perceptual (Sensory)

Rating scale: seven-point scale ranging from **Very Low** to **Very High**.

very low	low	low-mod	moderate	mod-high	high	very high
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The physical, associative and perceptual attributes and values described above for PA ONL Lake McKay Station and environs Valley can be summarised as follows:

- (a) **High physical values** as a predominantly unmodified landform shaped by uplift, glacial and fluvial processes, as part of the recognised basin and range landform sequence in Central Otago, the important and intact vegetation types and habitats, and the mana whenua features associated with the area.
- (b) **Moderate associative values** relating to the mana whenua associations of the area, the historic attributes of gold mining and high-country pastoralism, and the shared and recognised values contributing to local identity and sense of place.
- (c) **High perceptual values** relating to the open character and resulting legible and expressive display of topography, the high level of perceived naturalness, the distinctive patterns of indigenous vegetation and pasture, and the memorability of various features within the PA.

Landscape Capacity

The landscape capacity of the PA ONL Lake McKay and environs for a range of activities is set out below.

- i. **Commercial recreational activities** – some landscape capacity for small scale and low-key activities that utilise existing infrastructure and enhance public access and protect the area's ONL values.
- ii. **Visitor accommodation and tourism related activities** – **very limited** landscape capacity for visitor accommodation activities that are co-located with existing consented infrastructure or are temporary or seasonal in nature, and are: located and designed to be barely discernible from external viewpoints; of a sympathetic scale, appearance and character; integrate appreciable landscape restoration and enhancement; enhance public access (where appropriate) and have a low key 'rural' character; and protect the area's ONL values. **No** landscape capacity for tourism related activities.
- iii. **Urban expansions** – **no** landscape capacity.
- iv. **Intensive agriculture** – **some** landscape capacity on the terraces and moraine plateaux for agriculture under irrigation that maintains the high levels of naturalness, openness and protects the legibility and ecological values of the PA.
- v. **Earthworks** – **limited** landscape capacity for to absorb earthworks associated with farming and rural living / visitor accommodation / commercial recreation activities and **some** landscape capacity for trails (walking and cycling) that maintain protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns.

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Commented [JH7]: OS 67.22 Upper Clutha Environment Society

Commented [JH8]: OS 73.5 Bike Wanaka Inc.
OS 99.7 Upper Clutha Tracks Trust

Commented [JH9]: OS 73.15 Bike Wanaka Inc.
OS 99.7 Upper Clutha Tracks Trust

Commented [JH10]: OS 73.15 Bike Wanaka Inc.
OS 73.5 Bike Wanaka Inc
OS 99.7 Upper Clutha Tracks Trust

- vi. **Farm buildings – limited** landscape capacity for modestly scaled recessive buildings that are reasonably difficult to see from outside the site.
- vii. **Mineral extraction – very limited** landscape capacity for farm-scale extraction ~~that protects the area's ONL values.~~
- viii. **Transport infrastructure – no** landscape capacity.
- ix. **Utilities and regionally significant infrastructure – limited** landscape capacity for infrastructure that is co-located with existing facilities, buried or located such that it is screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened, these should be co-located with existing infrastructure and designed and located so that they are not visually prominent. In the case of the National Grid, limited landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks.
- x. **Renewable energy generation – no** landscape capacity for commercial scale renewable energy generation. **Limited** landscape capacity for discreetly located and small-scale renewable energy generation that ~~protects the area's ONL values and is not visually prominent.~~
- xi. **Production Forestry – no very limited** landscape capacity ~~for small scale production forestry.~~
- xii. **Rural living – very limited** landscape capacity for rural living development that is co-located with existing ~~built development, at lower elevations and contained by landform and/or existing vegetation – with the location scale and design of any proposal ensuring that it is barely discernible from external viewpoints. Developments should be of a modest scale have a low key 'rural' character; integrate landscape restoration and enhancement and enhance public access (where appropriate); and protect the area's ONL values.~~

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21.22.24 Lake McKay Station and Environs PA ONL Schedule

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Blue highlighted text: captured in "Response to Submissions (version of) 21.22.24 Lake McKay Station and Environs PA ONL Schedule". New text to be underlined with black line, deleted text to be strike through.

Red text relates to a submission point that has not been specifically captured in the "Response to Submissions (version of) 21.22. 24 Lake McKay Station and Environs PA ONL Schedule". This is typically because the submission point is general rather than confined to specific text amendments. One example identified.

Green wash line: Submission point re-notified 22 June 2023.

Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 2.3	John Robert Binney	Support	That landscape schedule 21.22.24 is retained as notified.	In agreement, no comment required other than to note the Schedule 21.22.24 text changes recommended in Response to Submissions Version of Schedule 21.22.24 (July 2023).	Accept submission in part
OS 67.22	Julian Haworth (Upper Clutha Environmental Society)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs largely supported although seek to amend the capacity for any intensive agriculture to protect the landscape character and naturalness of the Outstanding Natural Landscape.	<p>Of note, the PA has a 'high' level of naturalness 'high' physical and perceptual values and 'moderate' associative values:</p> <p>I recommend the following wording changes which partly addresses the submission point.</p> <p>(iv). Intensive agriculture – some landscape capacity on the terraces and moraine plateaus for agriculture under irrigation that maintains the high levels of naturalness, openness and protects the legibility and ecological values of the PA.</p> <p>Note: Reference to 'protect ONL values' has been deleted from the PA Schedules as it is unnecessarily repetitive of the Chapter 3 policies which apply to ONLs within the district.</p>	Accept submission in part

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 67.23	Julian Haworth (Upper Clutha Environmental Society)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended so that any utilities or energy generation facilities should be designed and located to not affect the Outstanding Natural Landscape when experienced from aerial overviews.	<p>The PDP objectives and policies directs that visual effects on the public be carefully considered from a ground-based perspective, which of course includes higher ground-based elevations too. Were the council to require an assessment of landscape effects from the air as part of the consenting process this in my opinion, would be difficult, requiring experts to carry out 'fly-overs' of their sites as part of fieldwork exercises.</p> <p>As such, I do not support the submitted addition to the schedule wording.</p> <p>Of note, commercial scale renewable energy generation - potentially where the greatest visual effects may be generated to an aerial audience has a 'no' landscape capacity rating in Schedule 21.22.24 capacity (x).</p>	Reject submission.
OS 67.24	Julian Haworth (Upper Clutha Environmental Society)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended so that any forestry capacity is confined to native species.	<p>The schedules adopt the District Plan definition for forestry and as such are non-specific on what type of forestry it is.</p> <p>In the capacity section of the schedule, (xi) has a 'very limited' capacity for small scale forestry. Relying on my knowledge of the area, fieldwork, careful review of the GIS mapping resources (including aerial imagery), there does not appear to be any forestry as it is defined in the District Plan within this PA. On this basis, I consider that the following amendments to Schedule 21.22.19 Capacity are appropriate:</p> <p>(xi) Production Forestry – very limited no landscape capacity for small scale production forestry on toe slopes, plateaus and flats that is consistent with the area's ONL values.</p>	Accept submission in part.
OS 67.25	Julian Haworth (Upper Clutha Environmental Society)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to change the capacity for rural living to 'extremely limited', with 'no capacity' in the elevated areas of the Outstanding Natural Landscape.	<p>No technical evidence is provided in support of this submission point.</p> <p>'Extremely limited' is not a capacity rating used.</p> <p>However, the 'qualifiers' under 'very limited' capacity set out in Schedule 21.22.24 capacity (xii) also play an important role in this regard, as they serve to 'curb' the inappropriate proliferation of rural living development within the PA including cumulative effects.</p> <p>The wording at xii describes a situation that precludes built development in elevated areas as such areas are not already developed. However, I recommend a minor wording change to help reinforce this:</p> <p>xii. Rural living – very limited landscape capacity for rural living development that is co-located with existing built development, at lower elevations, and contained by landform and/or existing vegetation – with the location scale and design of any proposal ensuring that it is barely discernible from external viewpoints. Developments should be of a modest scale have a low key 'rural' character; integrate landscape restoration and enhancement; enhance public access (where appropriate); and protect the area's ONL values.</p>	Accept submission in part.

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 70.42	Ainley McLeod on behalf of Transpower New Zealand Limited	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended in its landscape capacity assessment point ix utilities and regionally significant infrastructure to include, 'In the case of the National Grid, limited landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks'.	I consider that the following amendments to Schedule 21.22.24 Capacity are appropriate: ix. Utilities and regionally significant infrastructure – limited landscape capacity for infrastructure that is co-located with existing facilities, buried or located such that it is screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened, these should be designed and located so that they are not visually prominent. In the case of the National Grid, limited landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks.	Accept submission.
OS 73.5	Ian Greaves on behalf of Bike Wanaka Inc	Oppose	That landscape capacity 21.22.24 Lake McKay & environs be amended to remove reference to limited or very limited capacity for new trails.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), and viewing the wider area from various locations, I do not consider it appropriate to remove the capacity reference for trails, as inappropriately located and/or designed trails have the potential to detract from ONL landscape values, particularly on the more visible slopes.	Reject submission.
OS 73.15	Ian Greaves on behalf of Bike Wanaka Inc	Oppose	That landscape capacity 21.22.24 Lake McKay & environs be amended to include the following - Walking and cycling trails: some landscape capacity for additional trails that are sympathetically designed to integrate with existing natural landform patterns.	In the Landscape capacity section at (v), trails are included within the broader earthworks category which has a 'limited' capacity and is considered to be appropriate. However, it is of my opinion that walking and cycling trails include relatively low levels of earthworks and therefore would be appropriate to have a greater level of capacity. I consider that the following amendments to Schedule 21.22.24 Capacity are appropriate: (v) Earthworks – limited landscape capacity for to absorb earthworks associated with farming and rural living / visitor accommodation / commercial recreation activities and some landscape capacity for trails (walking and cycling) that maintain protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns.	Accept submission.
OS 77.32	Michael Bathgate on behalf of Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.24 paragraph 4 be amended to correct the spelling of Mata-au.	Spelling amended.	Accept submission.
OS 88.1	Nicky Ellingham (Lake McKay Station)	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs be rejected as the landscape attributes, values and capacities are not reflective of community views.	No technical evidence is provided in support of this submission point. Ms Gilbert's evidence in chief (EiC) describes the background to the PA Schedules project which included seeking public feedback on landscape values prior to notification. This matter is also addressed by reporting planner in S42A Report.	N/A
OS 88.2	Nicky Ellingham (Lake McKay Station)	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs be rejected as the scale is too large to prescribe uniform landscape values, attributes and capacities given the variation in topography, vegetation, and landscape within the priority area.	Ms Gilbert's EiC addresses the question of the appropriate scale for landscape assessment in relation to the PA Schedules work. The Preamble to Schedule 21.22 explains that capacity ratings are assessed at a PA level, and are not intended to be uniform descriptions of landscape values, attributes and capacity. The intention is for the schedules to inform site-specific landscape assessments as part of future resource consent or plan change applications that will identify, at a finer grain, the landscape values, attributes and capacities relative to specific proposals.	Reject submission.

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 88.3	Nicky Ellingham (Lake McKay Station)	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs capacity descriptions for commercial recreational value, visitor accommodation and tourism activities, intensive agriculture, farm buildings, renewable energy generation and rural living be amended. There are locations within the priority area where these activities could take place without affecting the landscape values which have been identified.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that a rating of no landscape capacity is appropriate for (iii) urban expansions, (viii) transport infrastructure and (x) commercial scale renewable energy production in the schedule. The other listed activities have a degree of capacity identified which I also consider to be appropriate. While there may be specific locations within the PA where activities might be appropriate, I consider that would need to be determined through a site specific landscape assessment, as contemplated by the Preamble to Schedule 21.22.	Reject submission.
OS 88.4	Nicky Ellingham (Lake McKay Station)	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs are not included into Chapter 21 of the Proposed District Plan until the methodology has been reconsidered and changed to incorporate the wider communities opinions and feedback on landscape values and capacities.	Addressed by reporting planner in S42A Report.	N/A
OS 88.5	Nicky Ellingham (Lake McKay Station)	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs be amended to give effect to the relief sought by the submitter.	Addressed by the reporting planner in the s42A Report	N/A
OS 99.7	John Wellington (Upper Clutha Tracks Trust)	Oppose	That landscape schedule 21.22.24 Lake McKay and environs be amended to state that there is development capacity for future public walking and cycling trails.	Addressed in response to OS 73.15.	Accept submission.
OS 115.13	Khaylm Marshall (Otago Fish and Game Council)	Oppose	That the list of physical attributes and values for landscape schedule 21.22.24 be amended to acknowledge that Luggate Creek is a valued habitat for fish spawning.	I recommend the following wording: 6a. Shrubland and remnant forest in the lower gorge section of Luggate Creek, including remnant silver beech, Hall's totara, broadleaf and locally uncommon shrub species. <u>Luggate Creek is an important spawning habitat hampered by the spread of willow in the lower reaches.</u>	Accept submission.
OS 123.1	Maddy Familton on behalf of Infracon Limited	Oppose	That the landscape capacity for commercial recreational activities (i) within the Lake McKay Station & Environs outstanding natural landscape is amended to the following: i. Commercial recreational activities - some landscape capacity for small scale activities that enhance public access and protect the areas ONL values.	No technical evidence is provided in support of this submission point. The utilisation of existing infrastructure (which the submission seeks to be deleted) is important to retain in my opinion as co-locating development assists with the management of landscape effects.	Reject submission.
OS 123.2	Maddy Familton on behalf of Infracon Limited	Oppose	That the landscape capacity for visitor accommodation and tourism related activities (ii) within landscape schedule 21.22.24 Lake McKay Station & Environs amended to the following: ii Visitor accommodation and tourism related activities - limited landscape capacity for visitor accommodation and tourism related activities. Any visitor accommodation and tourism related activities should be located and designed to be barely discernible from external viewpoints; of a sympathetic scale, appearance and character; integrate appreciable landscape restoration and enhancement; enhance public access (where appropriate); have a low key 'rural' character; and protect the area's ONL values.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that these ratings are appropriate from a landscape perspective. In particular, I note that the PA comprises vast areas with no built forms and very little landform modification and is described at [1] in the schedule as: "...the westernmost and highest element of the characteristic 'basin and range' fault block landscape that stretches across Central Otago. At the northern end of the range, the PA takes in a lower ice-eroded shoulder that defines the southern enclosure of the Upper Clutha basin. Within this shoulder, moraines form smoother surfaces between rocky outcrops and hummocks, and the deeply cut gullies of Luggate, Alice Burn, Tin Hut, Dead Horse and Sheepskin creeks dissect the landscape in a south-west to north-east direction. The lower margin of the shoulder, south and east of Luggate, has ice-scoured terrain with rock exposures and fluvially formed escarpments and terraces leading down to the basin floor."	Reject submission.

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
				For these reasons I consider the rating of 'very limited' landscape capacity for visitor accommodation development and 'no' landscape capacity for tourism related activities (resorts) is appropriate.	
OS 123.3	Maddy Familton on behalf of Infracon Limited	Oppose	That the landscape capacity 21.22.23 for rural living activities (xii) within the Lake McKay Station & Environs outstanding natural landscape is amended to the following: xii. Rural Living - limited landscape capacity for rural living development. any rural living development should be contained by landform and/or existing vegetation - with the location scale and design of any proposal ensuring that it is barely discernible from external viewpoints. Developments should be of a modest scale; have a low-key rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain public views across open land to surrounding landforms.	No technical evidence is provided in support of this submission point. Addressed in response to OS 123.2.	Reject submission.
OS 134.2	Maree Baker-Galloway on behalf of Criffel Deer Ltd, Ballantyne Barker Holdings Ltd, Mt Acernus Holdings Ltd	Oppose	That Criffel Deer Limited property be removed from the Lake McKay Station PA.	No technical evidence is provided in support of this submission point. The spatial extent of the Priority Area ONF/L mapping has been confirmed by the Environment Court (Topic 2 Decisions) and ONF/L mapping amendments (of the nature requested by the submitter) are beyond the scope of the Variation.	Reject submission.
OS 134.12	Maree Baker-Galloway on behalf of Criffel Deer Ltd, Ballantyne Barker Holdings Ltd, Mt Acernus Holdings Ltd	Oppose	That the boundary of the Lake McKay PA be amended on its western boundary to either follow the natural ridgeline, or simply excluded the Criffel Deer Limited property.	No technical evidence is provided in support of this submission point. The spatial extent of the Priority Area ONF/L mapping has been confirmed by the Environment Court (Topic 2 Decisions) and ONF/L mapping amendments (of the nature requested by the submitter) are beyond the scope of the Variation.	Reject submission.
OS 162.2	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is deferred until methodology is reconsidered and applied or amended to give effect to the submitters relief outline in this submission.	Addressed by reporting planner in S42A Report.	N/A
OS 162.4	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended so each schedule includes a more robust disclaimer/statement that reinforces the very broad brush approach that has been applied to landscape assessment in the priority area.	Addressed in the Response to Submissions Version of the Preamble to Schedule 21.22. Also addressed by Ms Gilbert in her EiC and the reporting planner in S42A Report.	N/A

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 162.5	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended so the schedule can identify variations in landscape types that are nested within the priority area, identify their landscape attributes and values and related capacity.	<p>No technical evidence is provided in support of this submission point.</p> <p>However, in my view, variations in topography, landcover and land use across the PA, which give rise to variations in terms of landscape character and visual amenity attributes and values, are appropriately acknowledged in the schedule wording.</p> <p>The Preamble to Schedule 21.22 explains that landscape capacity is evaluated at a PA level within the Schedule. A determination of capacity levels at scales smaller than this (such as at a site-specific level) would form part of landscape assessments for resource consent and plan change applications.</p> <p>In other words, the capacity descriptions should not be taken as prescribing the capacity of specific sites.</p>	Reject submission.
OS 162.6	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is rejected as notified as the conclusions reached in their respective schedule to describe the related capacity of potential land uses are too conclusive.	<p>No technical evidence is provided in support of this submission point.</p> <p>Ms Gilbert's EiC addresses the question of the whether the capacity ratings are too conclusive and the appropriateness of considering potentially suitable future uses as part of the PA Schedules work.</p>	Reject submission.
OS 162.7	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is rejected as notified as the schedules do not properly reflect the landscape capacity of the priority area, nor in founding assessment, the environment anticipated by the District Plan.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my knowledge of the area (including fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider the landscape capacity ratings in the Response to Submissions Version of the PA Schedules are appropriate.</p> <p>Ms Gilbert's EiC addresses the suitability of the founding assessment methodology in more detail.</p>	Reject submission.
OS 162.8	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended so the assessment should not only seek to limit capacity/restrain land use based on the broad perceptual/experiential factors observed, but where appropriate, capacity ratings should identify opportunities for greater capacity for rural living development.	<p>No technical evidence is provided in support of this submission point.</p> <p>Addressed in response to OS 123.3.</p>	Reject submission.
OS 162.9	Dan Curley on behalf of Phillip and Rosalee Gilchrist	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is rejected as notified as the stated capacity is too conclusive, lacking sufficient contemplation of potentially suitable future land uses within parts of the priority area.	Addressed in response to OS 162.6.	Reject submission.

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 163.2	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended to give effect to the submitters relief outline in this submission.	Addressed in response to OS 162.2.	N/A
OS 163.4	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is deferred until methodology is reconsidered and applied, or amended so each schedule includes a more robust disclaimer / statement that reinforces the very broad brush approach that has been applied to landscape assessment in the priority area.	Addressed in response to OS 162.4.	N/A
OS 163.5	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended so the schedule can identify variations in landscape types that are nested within the priority area, identify their landscape attributes and values and related capacity.	Addressed in response to OS 162.5.	N/A.
OS 163.6	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is rejected as notified or amended to address that the conclusions reached in the respective schedules to describe the related capacity of potential land uses are too conclusive.	Addressed in response to OS 162.6.	Reject submission.
OS 163.7	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is rejected as notified or amended to address that the schedules do not properly reflect the landscape capacity of the priority area, nor in founding assessment, the environment anticipated by the District Plan.	Addressed in response to OS 162.7.	Reject submission.
OS 163.8	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is rejected as notified or amended to address that the stated capacity is too conclusive and lacks sufficient contemplation of potentially suitable future land uses within parts of the priority area.	Addressed in response to OS 162.6.	Reject submission.
OS 163.9	Dan Curley on behalf of Lake McKay Limited Partnership Ltd	Oppose	That the landscape schedule 21.22.24 Lake McKay and Environs is amended so the terminology adopted by the schedules is required to be consistent with wording applied by the Proposed District Plan.	The submitter has not explained which PDP terminology they prefer in this regard. I reviewing this submission point, I have recommended that (xi) 'Production Forestry' from the Landscape Capacity section of the schedule is amended to 'Forestry', so that it aligns with District Plan terminology. This matter is addressed in more detail in Ms Gilbert's EIC and by the reporting planner in the s42A Report.	N/A
OS 188.32	Elisha Young-Ebert (Te Rūnanga o Ngāi Tahu)	Oppose	That landscape schedule 21.22.24 paragraph 4 be amended to correct the spelling of Mata-au.	Spelling amended. Addressed in response to OS 77.32.	Accept submission.
OS 190.1	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to clarify the circumstances in which applicants, Council planners and landscape architects, decision-makers and others involved in Resource Management Act processes will utilise the information in the landscape schedules.	Addressed by reporting planner in S42A Report.	N/A
OS 190.2	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to clarify in what instances plan users processing resource consents will refer back to Chapter 3 provisions and utilise the landscape schedules.	Addressed by reporting planner in S42A Report.	N/A

Original Submission No	Submitter	Position	Submission Summary	JH comments	JH recommendation
OS 190.3	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to clarify whether an application seeking consent under a district wide rule only will be required to address matters in the landscape schedules.	Addressed by reporting planner in S42A Report.	N/A
OS 190.4	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to remove the capacity rating of no capacity as individual sites within the priority area have not been examined in detail.	Addressed in response to OS 88.2.	Reject submission.
OS 190.5	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to confirm the extent of the capacity rating scale in the landscape schedules themselves.	Addressed in the recommended amendments to the Response to Submissions Version of the Preamble to Schedule 21.22. The extent of the capacity rating scale is also addressed in more detail by Ms Gilbert in her EiC and the reporting planner in the S42A Report.	N/A
OS 190.6	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the plan change be rejected or amended to address that the Section 32 report for the landscape schedules is deficient in that it does not adequately evaluate the costs, benefits, efficiency, and effectiveness of the options or of the landscape schedules provisions.	Addressed by reporting planner in S42A Report.	N/A
OS 190.7	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That plan change be rejected or amended to address that the consultation for the landscape schedules was deficient and did not seek meaningful input in relation to, for example, rating of landscapes' capacities for change and should be undertaken again.	Addressed by reporting planner in S42A Report.	N/A
OS 190.8	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs be rejected or amended to address that it will cause an increased regulatory burden and costs and should be modified to recognise that farming practices should not be locked into a particular set of landscape values.	The role of past and present farming practices in shaping landscape values is acknowledged (where relevant) under the Physical Attributes and Values section of the Schedule, typically under the 'Important ecological features and vegetation types' sub-header (see 'other distinctive vegetation types') and the 'Important land-use patterns and features' sub-header. Where appropriate, the role of historic farming practices is referenced in the Associative Attributes and Values section of a Schedule, under the 'Important historic attributes and values' sub-header. In addition, the role of farming patterns and characteristics is referenced in the Perceptual Attributes and Values under the 'Particularly important views to and from the area' and 'Naturalness' sub-headers.	Reject submission.
OS 190.9	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs be rejected or amended to address that it does not provide flexibility for changes in farming practices and technologies and should be modified to recognise this. The schedule should allow sufficiently for flexibility and the future opportunities for proactive change and technology improvements.	No technical evidence is provided in support of this submission point. The focus of the PA schedules is to identify the existing landscape values that need to be protected while providing a high-level indication of the landscape capacity of the PA for a range of land use activities. The Landscape Capacity section of the schedule includes a range of 'development characteristics' that are likely to be associated with appropriate development (for each land use type), within the PA. As such, the PA schedules acknowledge the dynamics of landscape change and anticipate the broad parameters or characteristics that are likely to make such change appropriate in terms of landscape values including visual amenity values. This matter is also addressed by the reporting planner in the s42A report.	Reject submission.
OS 190.10	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended so non-farming activities are not overly constrained by the landscape schedules for the diversification of farm economies.	No technical evidence is provided in support of this submission point. <u>Relying on my knowledge of the area (including fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider the landscape capacity ratings in the Response to Submissions Version of the PA Schedules are appropriate.</u> This matter is also addressed by the reporting planner in the s42A report.	Reject submission.

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OS 190.11	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to remove the words 'utilise existing infrastructure' from the commercial recreational activities capacity assessment.	Addressed in response to OS 123.1.	Reject submission.
OS 190.12	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to change the capacity assessment for visitor accommodation and tourism related activities from 'very limited' to 'limited', to include the words 'and tourism related', 'Any visitor accommodation and tourism related activities' and 'should be', and to remove the words 'that are', 'co-located with existing consented infrastructure or are temporary or seasonal in nature, and are', and to remove the 'no capacity' rating for tourism related activities.	Addressed in response to OS 123.2.	Reject submission.
OS 190.13	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to change the capacity rating for rural living from 'very limited' to 'limited' and to replace the words 'that is co-located with existing development and' with 'Any rural living development should be'.	Addressed in response to OS 123.3.	Reject submission.
OS 190.14	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That the landscape schedule 21.22.24 Lake McKay and environs is amended to acknowledge that some activity terms (such as intensive agriculture) are a direct response to the Chapter 3 provisions that also use these terms. Any additional activities referred to in the landscape schedules, particularly those in the landscape capacity assessment should utilise defined terms.	Addressed by reporting planner in S42A Report.	N/A
OS 190.15	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That alternatively to the relief sought in this submission additional or consequential relief necessary or appropriate to address the matters raised in this submission and/or the relief requested in this submission, including any such other combination of plan provisions, objectives, policies, rules and standards provided that the intent of this submission is enabled.	Addressed by the reporting planner in the s42A Report	N/A
OS 190.16	Maddy Familton on behalf of Bell Group Limited (Lake McKay)	Oppose	That if the relief sought in this submission is not granted that the landscape schedules are rejected and withdrawn.	Addressed by the reporting planner in the s42A Report	N/A