

**BEFORE THE HEARINGS PANEL
FOR THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Hearing Stream 12
Upper Clutha Mapping

**STATEMENT OF EVIDENCE OF ANDREW WILLIAM CRAIG ON BEHALF OF JOHN MAY
FURTHER SUBMITTER 1094
LANDSCAPE**

13 JUNE 2017

INTRODUCTION

- 1 My full name is Andrew William Craig.
- 2 I hold the position of Director of *Andrew Craig Landscape Architecture Limited*. I have been in this position since 2009.
- 3 I have been practising landscape architecture since 1987. For 5 years until mid-2009 I was employed by Peter Rough Landscape Architects Ltd. Before that I was employed by the Christchurch City Council for 13 years, working in the area of environmental policy and planning. Prior to that I worked for a short time with the Department of Conservation. Most of my work since graduation and to date has involved landscape assessment and the development of landscape policy.
- 4 I hold a Bachelors of Arts degree (Canterbury University) and a post graduate diploma in landscape architecture (Lincoln University).
- 5 I have been engaged by John May to provide landscape evidence in response to a submission made by Glendhu Bay Trustees Ltd (Parkins Bay) – hereafter the GBT submission.
- 6 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I have complied with it in preparing this evidence and I agree to comply with it in presenting evidence at the hearing. The evidence that I give is within my area of expertise except where I state that my evidence is given in reliance on another person's evidence. I have considered all material facts know to me that might alter or detract from the opinions I express in this evidence.

SCOPE OF EVIDENCE

- 7 My evidence focusses on the Outstanding Natural Landscape (ONL) which the entire Submitter's site is subject to, notwithstanding that they wish to have part of the ONL overlay removed. In particular I am concerned that some of the Chapter 44 provisions proposed by the Submitter are not sufficient to

achieve the aspirations of the proposed District Plan for its ONLs thereby not giving appropriate effect to RMA s6(b)¹.

- 8 More specifically with regard to landscape effects, the chief matter of concern is that the Submitter seeks controlled activity status for buildings, particularly with regard to bulk and location. The Submitter then lists matters of control, none of which reference the ONL status of the land. Nor do they invite consideration of other District Plan provisions – namely objectives, policies and assessment matters - concerning the effects of activity within ONL.
- 9 Lastly, I am advised² that controlled activity status avoids the prospect of notification. As I will demonstrate, this is a concern because the proposed District Plan provisions place considerable emphasis on the effects of activity within ONL beyond application site boundaries. In this regard the Plan requires consideration of effects on both public and private parties. Thus, I further understand these parties will have no opportunity to respond to proposed activities that have the potential to adversely affect their appreciation of the ONL landscape and the amenity derived from it.
- 10 As intimated, the Submitter's proposed Chapter 44 does not refer to the ONL status of the land subject to the submission. It is evident to me that the District Plan regards ONL/Fs as the District's most important landscapes and features. It is my opinion therefore that any activity occurring within an ONL/F not otherwise permitted should be given much broader consideration than that embodied within the narrow confines of the Submitter's proposed Chapter 44. The reason is that application of other District Plan provisions will ensure the outcomes desired for the District's ONL/Fs is achieved. In summary therefore, I do not believe that the Submitter's Chapter 44 provisions are sufficiently robust to achieve these District wide outcomes.
- 11 In my evidence I address the above matters in the following way:

¹ RMA s6(b) - the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development

² By Mr Graham Taylor (Planner acting on behalf of Southern Ventures Ltd)

- a. Discussion of the proposed District Plan provisions where they relate to the ONL outcomes for the land in question.
 - b. Consideration of the Council's S42A report and other relevant material presented by the Council.
- 12 In preparing my evidence I have read:
- a. The GBT submission [number 583].
 - b. Relevant parts of the proposed Queenstown Lakes District Plan.
 - c. The Council's s42A landscape evidence³.
 - d. The Environment Court Decisions where relevant to landscape matters.
 - e. John May's further submission opposing GBT's submission.
- 13 I have visited the area subject to the proposed re-zoning. I have also viewed the site from various publically accessible vantage points beyond it. I have also viewed the area from private property.
- 14 Finally, with a view to avoiding repetition I do not cover some of the matters raised in the Council's s42A landscape report. Generally I agree with all of those matters traversed in the report.

EXECUTIVE SUMMARY

- 15 It is my opinion that the relief sought is not the most appropriate means of achieving the outcomes expected by the PDP for the landscape of the area in question. Specifically:
- a. The ONL (Outstanding Natural Landscape) status of the land should be retained where the submitter seeks (Submission point **583.8**) *Rural Landscape Classification* for Fern Burn Valley⁴.

³ Prepared by Dr Marion Read 17 March 2017

- b. That proposed Objective 44.3.1 and its supporting policies fail to acknowledge the ONL status of the land potentially affected by the Glendhu Station Zone (Submission point **583.4**).
- c. That all proposed building activity embodied in the submission – namely 8 residential units additional to the 42 consented and the proposed Lodge - should be subject to consideration of all of the relevant proposed District Plan provisions subject to full discretionary activity status.

16 Consequently, given the ONL status of the land and therefore the sensitivity of the site and the Proposed District Plan matters relevant to landscape outcomes, it is my opinion that a high level of control is necessary in order to appropriately manage potential adverse effects arising from development within the proposed zone.

DISTRICT PLAN LANDSCAPE MATTERS

17 As the entire site is subject to ONL status the relevant part of the Proposed District Plan is Chapters 3 – Strategic Direction; 6 – Landscapes; and 21.7 - Assessment Matters. In combination these chapters give a good indication of what kind of landscape the Council wants for its ONL/Fs and how they are to be managed. Each of these chapters I discuss in turn. In addressing these I understand that these Chapters are not yet operative.

Chapter 3 - Strategic Direction

18 The relevant part of this chapter is 3.4.5 whose goal is: *Our distinctive landscapes are protected from inappropriate development*. I have cited this section in full in **Appendix 1** to my evidence.

19 Objective 3.2.5.1 seeks to protect the natural character of ONL/Fs from subdivision, use and development. The key concern here revolves on delivery of natural character. In landscape terms natural character correlates to the extent a landscape has been modified by human activity. The more modified a landscape is the less natural it is.

⁴ Formerly VAL (Visual Amenity Landscape) – see Operative District Plan Vol. 1 Appendix 8B Map 1

- 20 The submitter's proposed provisions, notably controlled activity status for subdivision (Submission point **583.1**) and buildings with no limit on their ultimate density (Submission point **583.3**) has the potential to substantially modify the landscape. In so doing the desired high level of naturalness anticipated for the ONL is in danger of being unacceptably eroded.
- 21 The ultimate outcome is that the ONL landscape at least appears and is known⁵ to be predominantly natural. The proposed plan provisions advanced by the submitter cannot guarantee such an outcome.
- 22 Policy 3.2.5.1.1 seeks to identify the district's ONL/Fs. Under the current operative plan the landscape of the entire subject site is subject to ONL status. As mentioned this includes the land within Fern Burn Valley where the submitter seeks to have the ONL status removed – see **Graphic Attachment Planning Map 7** (page 2). In paragraph 6.3 of her evidence, Dr Read explains the Environment Court's rationale for bestowing ONL status on this area. I agree with her and the Court's observations and conclusions regarding this.
- 23 This same policy also seeks to protect the ONL/Fs from the adverse effects of subdivision and development. Other objectives and policies point to what these effects are. As discussed, adverse effects on natural character is one. The assessment matters also signal potential adverse effects and importantly observe that appreciation of these occur both within and outside of the subject site. I will talk about these in more detail later.
- 24 Objective 3.2.5.2 sets out to minimise the adverse effects of activity in '*...specified Rural Landscapes.*' The supporting policy (3.2.5.2.1) refers to the Rural Landscape Classification which is not relevant in this case.
- 25 Policy 3.2.5.4.1 concerns cumulative effects on landscape character when considering residential activity in rural areas. This does not appear to be a matter specifically referred to in the submitters proposed matters of control or

⁵ When assessing the effects of proposed activity the RMA requires both visual and landscape effects to be considered – see RMA Fourth Schedule 7(1)(b) *any physical effect on the locality, including any landscape and visual effects* and (d) *any effect on natural and physical resources having aesthetic, recreational, scientific, historical, spiritual, or cultural, or other special value for present or future generations* (my underline). Landscape effects are those arising from changes to the landscape irrespective of whether they are visible.

discretion⁶. I acknowledge however, that the matters of control for buildings for example, are more general where they include consideration of effects on natural character and landscape and amenity values.⁷ This may include consideration of cumulative effects but this is not guaranteed.

Chapter 6 - Landscape

- 26 Here I only address those objectives and policies that I consider are directly relevant to the submitter's proposal – namely that the site is subject to ONL status. Each of these is addressed in order of how they appear.
- 27 Objective 6.3.1 simply requires that ONL/F and rural landscapes require protection from inappropriate subdivision and development. To that end Policies 6.3.1.1 and 6.3.1.2 seeks to identify and classify these landscapes. As mentioned the subject site is in its entirety an ONL.
- 28 Policy 6.3.1.3 requires subdivision and development proposals to be considered against the Chapter 21 – Rural assessment matters; specifically those listed in 21.7.1 and 21.7.3. I will refer to these in more detail later; suffice to say that any proposed subdivision and development within the subject site will need to be evaluated in response to these assessment matters. The policy goes on to explain why this is necessary where it states: '*...subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.*' The controlled activity status sought by the submitter for building development in the ONL is in my opinion not the most appropriate means of recognising and managing the effects arising from the 'exceptional case.'
- 29 At a much more specific level Policy 6.3.1.8 seeks to ensure that '*...other properties, roads, and public places or the night sky lighting effects...*' are not subject to glare. I note that in addition to public places and roads, the policy refers to '*...other properties...*' and so the effects are not just confined to the

⁶ See proposed Rule 44.5.2 – 44.5.4

⁷ Proposed Rule 44.5.2 (d) (i)(ii)

subject site. I recognise that the submitter regards exterior lighting as a matter of control.⁸

- 30 Allied to the above policy is 6.3.1.11 that seeks to recognise the importance of protecting landscape character and visual amenity and goes on to state ‘...*particularly as viewed from public places.*’ So it appears that the proposed District Plan is cognisant of effects on the landscape as appreciated from public places in addition to neighbouring properties – these I have shown in my **Graphic Attachment Map 1** (page 3). In this sense the potentially affected ONL/F landscape is considered in terms of its appreciation public realm.
- 31 Policy 6.3.1.12 requires regard be had for cultural and historic elements that may fall within land subject to ONL/F status. This includes Tangata Whenua values. Somewhat incongruously, the policy also refers to geological features. Although outside my area of expertise, it is evident geological features are prominent whose integrity remains intact due to the extent of relatively low modification and absence of land use fragmentation.
- 32 An example is what appears to be a particularly coherent *rôches moutonnées* earmarked by the submitter for a future lodge development – see **Graphic Attachment Photograph 1** (page 4). The setting of this feature is, relative to Glendhu Bay, almost entirely devoid of modification. This is particularly so regarding physical features such as buildings, roads and services. In my opinion it is a particularly sensitive part of the landscape that is prominent in the views from nearby properties and would therefore require a very high level of intervention in consideration of future development.
- 33 For this particular site identified by the Environment Court and the submitter as accommodating a possible lodge; the submitter seeks controlled activity status with a maximum building height of 12 metres⁹. Such a height would not give me confidence that the lodge could be sited or designed to blend in with its setting to the extent that it would not be visually prominent or be

⁸ Proposed Rule 44.5.2(a)

⁹ Proposed Rule 44.6.8(a) (iv).

reasonably difficult to see,¹⁰ nor that the landscape integrity of this geological feature is maintained.

- 34 Objective 6.3.2 seeks to avoid adverse cumulative effects on landscape character and so echoes Chapter 3 Strategic Directions Policy 3.2.5.4.1 which I discussed earlier (see paragraph 23). The comments I made there apply equally to this objective.
- 35 Policy 6.3.2.1 recognises that the District's rural landscapes and their qualities are finite. This also includes the amenity values derived from them which in this case involve scenic and natural attributes. The finite qualities of the site and features or elements within need recognition in terms of how the effects of development might be managed so as to maintain the predominance of natural character and scenic quality.
- 36 To this end, Policy 6.3.2.2 prefers that residential activity only locates in areas where the '*...District's landscape character and visual amenity would not be degraded.*' Within the submitter's site, the most appropriate area for such activity would be centred on that consented by the Environment Court – namely Fern Burn Valley and the Glendhu Bay frontage. While still an ONL, it is the most modified part of it. In principle, it is my opinion that it is better to have activities and their effects clustered rather than dispersed over the landscape.
- 37 Further, I note that the Court's approach in granting consent is based on finely nuanced and very detailed site specific design parameters. These include, for example, building colour, building form, lighting, planting regimes, vehicle access and earthworks formation. The decision also incorporates site plans for each building site. An overarching masterplan ensures each building is integrated with each other and the overall site setting. It is my opinion that a similar approach should be assumed for future development subject to the District Plan provisions where they relate to landscape outcomes.
- 38 One matter arising from development in ONL in particular is the effects of mitigation that in turn are potentially adverse. This is a matter that Policy

¹⁰ The relevant visibility assessment criteria for ONL/ONFs from public and private places in assessment matter 21.7.1.4 of the Proposed District Plan.

6.3.2.5 seeks to address. Mitigation such as those types identified in the policy involving screen planting, mounding and earthworks may derogate from prevailing natural patterns.

39 As a matter of principle it is therefore important that such measures are cognisant of natural patterns and replicate them as best as possible. To do this mapping of the site is required identifying natural patterns arising from the combination of vegetation, landform, soils and waterbodies.

40 Objective 6.3.3 aims to '*Protect, maintain or enhance the district's Outstanding Natural Features*' while supporting policy 6.3.3.1 seeks to achieve this by avoiding subdivision and development. The submitter's site is not an ONF, but nearby Roys Peninsula is. Thus Policy 6.3.3.2 is relevant where it sets out to (in full);

Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Landscapes adjacent to Outstanding Natural Features would not degrade the landscape quality, character and visual amenity of Outstanding Natural Features.

41 So it is evident from this particular policy that regard has to be had for the effects of activity within the Submitters ONL site on the Roys Peninsula ONF. Or to reiterate, the effects arising from activity on the Submitter's site are recognised by the Plan as potentially extending beyond the site boundary and quite possibly adversely affecting the ONF.

42 Objective 6.3.4 is the same as Objective 6.3.3 except that it concerns ONLs rather than ONFs.

43 Supporting Policy 6.3.4.1 wants to avoid subdivision and development that would degrade important landscape character and amenity qualities. This is especially so where '*...there is no or little capacity to absorb change.*' To determine this would entail an overall assessment for not only the site in question but the entire receiving environment. This is because the policies cited earlier require consideration of effects beyond site boundaries. Further, the public and neighbours do not confine their appreciation of the landscape

to particular site boundaries. Instead their appreciation involves the entire landscape setting in which any particular site is located.

- 44 Because Glendhu Station is a working farm within an ONL, Policy 6.3.4.2 recognises that farming activity will affect the landscape. It then adds that such activity may continue provided '*...the quality and character of the Outstanding Natural Landscape is not adversely affected.*' I note that the Submitter's proposed Policy 44.3.1.7 seeks to provide for farming (and recreation) but does not subject itself to the above cited Policy 6.3.4.2 proviso.
- 45 Allied to Policies 6.3.1.8 and 6.3.1.11 cited earlier is Policy 6.3.4.3. It is concerned with the adverse effects of activity on landscape character and amenity as viewed from public places, especially from formed roads. Again the Plan is signalling the importance of effects beyond site boundaries. It should also be noted in this regard, despite the emphasis of effects from roads, that a significant public vantage point in this area is the lake surface. Likewise from nearby Roys Peak and Diamond Lake.
- 46 Policy 6.3.4.4 discourages the development of large scale infrastructure projects within ONLs such as wind farms and hydro- electric schemes. None are anticipated for the Submitter's proposed zone, but mining activity is where it contributes to development of the zone¹¹. This policy prefers that large scale mining is avoided and it is evident from the standards proposed by the Submitter that mining is going occur at a small scale. Nonetheless, mining can have a significant enduring effect on the landscape resulting in possible scarring and changes to landform.
- 47 Finally, Objective 6.3.7 seeks recognition and protection of indigenous biodiversity. While strictly speaking not a landscape matter, the objective makes it one where it refers to the contribution indigenous biodiversity makes to '*...the visual quality and distinctiveness of the District's landscapes.*'
- 48 I am aware the Submitter makes provision for indigenous biodiversity via proposed Policies 44.3.1.5¹² and 44.3.1.6¹³. As per my earlier comments

¹¹ Proposed Policy 44.3.1.9 implemented via Submitter's proposed Rule 44.5.3 and DP proposed Rule 44.6.2(d), (e) and (f).

¹² Concerning landscape protection areas

however, it is important to ensure that the provision of such biodiversity where it contributes to landscape character and amenity is not piecemeal, nor contrary to prevailing natural vegetation patterns. That is, its provision needs to be considered for the site as a whole so as to maintain visible landscape coherence and integration with the surrounding landscape. The means of achieving this is via Policy 6.3.7.1 which encourages activity so as to maintain and enhance biodiversity protection and regeneration. I am aware that for parts of the site subject to the conditions of consent imposed by the Environment Court that this will indeed occur¹⁴. To reiterate however, it is my opinion that this approach applies to the entire site. This does not rule out development, but it does require broad scale planning and assessment.

- 49 Similarly Policy 6.3.7.2 bolsters this approach where it seeks to avoid the clearance of indigenous vegetation, particularly '*...where it would significantly degrade the visual character and qualities of the District's distinctive landscapes.*'

Chapter 21.7 Assessment Matters (Landscape)

- 50 As for the objectives and policies, I have cited the Assessment Matters in full in my Appendix 1. In the discussion to follow I examine the various themes that arise from the Assessment Matters (AM). As can be expected they reflect the objectives and policies I have considered in the foregoing discussion.
- 51 From the outset the Assessment Matters¹⁵ do not encourage development within ONL/Fs except for activity that is permitted. To that end AM 21.7.1.1 states:

The assessment matters are to be stringently applied to the effect that successful applications will be exceptional cases.

- 52 It appears that the AM adopt four distinct themes, which are:

¹³ Concerning the provision of biodiversity within the Residential Activity Area.

¹⁴ Assuming that the resource consents granted by the Environment Court are not surrendered in favour of the proposed zone provisions, should they be made operative.

¹⁵ 21.7.1 Outstanding Natural Features and Outstanding Natural Landscapes (ONF and ONL).

- a Effects on landscape quality and character (also includes consideration of cultural attributes) [21.7.1.3]
- b Effects on visual amenity [21.7.1.4]
- c Design and density of development [21.7.1.5]
- d Cumulative effects of subdivision and development on the landscape [21.7.1.6]

53 Appearing separately but also of relevance are AM 21.7.3 which requires consideration be given to *'Other factors and positive effects, applicable in all the landscape categories (ONF, ONL and RLC)'*. Under this suite of AMs positive effects identified include environmental compensation, landscape protection by way of covenants for example, public access, maintenance and enhancement of landscape quality and character including habitat. I acknowledge that this will happen subject to the consent conditions imposed by the Environment Court for the current development proposal.

54 Concerning effects on landscape quality and character the AM essentially apply the amended Pigeon Bay criteria. This criterion is commonly used throughout New Zealand to assess whether a landscape merits ONL/F status. The AM take it down a level and apply it to consideration of effects within an ONL. I agree with this approach as it is a good way of testing whether those factors and elements ascribed to the ONL in the first place will be maintained following development.

55 Concerning visual effects, there appears to be considerable emphasis placed on these as viewed from vantage points beyond the site in which development is proposed. In this regard AM 21.7.1.4 (a) seeks consideration of *'the extent to which the proposed development will not be visible or will be reasonably difficult to see when viewed from public roads and other public places'*. It also extends consideration of such effects to both public and private views from

within ONL/Fs¹⁶. This would include all of the land in the vicinity of the Submitter's site. I am not confident that the building heights proposed by the Submitter, particularly the 12m maximum height proposed for the Lodge would achieve the outcomes flagged by these particular AM.

- 56 The design and density of development AM also requires consideration of effects from beyond the site boundary. Specifically they prefer development to be '*...least visible from public and private locations.*' [AM21.7.1.5 (c). Again my earlier comments regarding the effects of buildings, particularly with regard to their height and location, apply.
- 57 The AMs also require consideration of cumulative effects taking into account the existing environment¹⁷. In my opinion the consented development would need to be implemented in order to ascertain the cumulative effects of additional proposed development. That way the effectiveness of any conditions applied to the consented development can be monitored, so informing potential conditions for future development.
- 58 Consideration of cumulative effects is critical in ONL settings as accumulated activity has the potential to significantly lessen natural character – this being a key prerequisite in determining ONL status. Assessment of cumulative effects is important therefore, irrespective of whether they are visible or not as the RMA requires consideration of both visual and landscape effects. That is, the loss of naturalness is not just a matter of visibility – it is also a landscape effect arising from enduring changes to the environment. In this regard AM 21.7.1.6 recognises this distinction where it states:

The Council shall be satisfied the proposed development, in combination with these factors will not further adversely affect the landscape quality, character, or visual amenity values.

THE COUNCILS S42A LANDSCAPE REPORT¹⁸

¹⁶ The assessment matter for private places is Assessment matter 21.7.1.4(b): the proposed development will not be visually prominent such that it detracts from public or private views of and within Outstanding Natural Features and Landscapes;

¹⁷ Existing environment comprising the environment of the moment; what is non-fancifully permitted and what is consented but not yet implemented.

¹⁸ Prepared by Dr Marion Read

59 Overall I agree with the observations and conclusions reached in the S42A landscape report. In particular I note that the provisions advanced by the Submitter would, in the opinion of Dr Read, '*...not be compatible with the objectives and policies of Chapter 6 of the PDP.*'¹⁹ Allied to this Dr Read also concludes that '*I continue to consider that the fully discretionary regime and Assessment Matters of Chapter 21 is the appropriate means to manage further development on this site and in this landscape...*'²⁰ These are the matters I have addressed in my foregoing discussion and so agree with Dr Read's opinion in this regard.

60 Dr Read also traverses topics not covered in my evidence, such as those concerning covenanted areas. I agree with her conclusions regarding these matters as well.

CONCLUSION

61 According to the PDP Chapter 6 values statement²¹ landscapes are a cornerstone upon which the district's social and economic wellbeing rests. Of these landscapes ONL/Fs are the most sensitive to any form of modification that may result in diminished naturalness and those qualities that make them outstanding.

62 It is evident from the relevant PDP provisions that the effects of activity within ONL/Fs have to be carefully managed. I accept that this does not necessarily rule out activity, provided the purpose of the ONL/F is protected – namely its naturalness and outstanding qualities. Appreciation of these is not just confined to individual sites subject to ONL/F status. It is much wider than that. In this regard the proposed District Plan provisions place considerable emphasis on the effects of activities potentially appreciated beyond site boundaries. As mentioned, these effects are not just those which are visible – they also include enduring changes to the landscape irrespective of whether they are visible or not. Therefore the PDP seeks protection of ONL/F character and qualities as appreciated from public and private places beyond application site boundaries. This suggests to me that the District Plan

¹⁹ Paragraphs 3.1(c) and 6.12

²⁰ Paragraph 6.13

²¹ Section 6.2

explicitly recognises the public as parties whose appreciation of the landscape is potentially affected by development in ONL/F. Or to put it another way, they along with landowners are beneficiaries of the kind of landscape outcomes and amenity derived from ONL/F.

- 63 As mentioned, it is my understanding that those parts of the submission seeking controlled activity status are in effect excluding public and private party consideration of potential effects on a widely appreciated landscape. These effects can be both positive and adverse, and I acknowledge that many of the measures advanced by the submitter are potentially positive.
- 64 So overall, it is my opinion that for any activity not otherwise permitted to occur in an ONL/F consideration must be given to the all of the relevant PDP provisions so as to better manage effects and to ensure desired landscape and amenity outcomes are achieved.

Dated 13 June 2017



Andrew Craig

Listed below are those provisions in the proposed District Plan which directly concern landscape outcomes. Not all however, are relevant to the land in question, but are nonetheless included so as to provide context and illustrate the different approaches the Plan takes in recognition of the District's various landscapes.

Chapter 3: Strategic Direction

3.2.5 Goal	Our distinctive landscapes are protected from inappropriate development.
Objective 3.2.5.1	Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from subdivision, use and development.
Policies 3.2.5.1.1	Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the adverse effects of subdivision and development.
Objective 3.2.5.2	Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes.
Policies 3.2.5.2.1	Identify the district's Rural Landscape Classification on the district plan maps, and minimise the effects of subdivision, use and development on these landscapes.
Objective 3.2.5.3	Direct new subdivision, use or development to occur in those areas which have potential to absorb change without detracting from landscape and visual amenity values.
Policies 3.2.5.3.1	Direct urban development to be within Urban Growth Boundaries (UGB's) where these apply, or within the existing rural townships.
Objective 3.2.5.4	Recognise there is a finite capacity for residential activity in rural areas if the qualities of our landscape are to be maintained.
Policies 3.2.5.4.1	Give careful consideration to cumulative effects in terms of character and environmental impact when considering residential activity in rural areas.
3.2.5.4.2	Provide for rural living opportunities in appropriate locations.
Objective 3.2.5.5	Recognise that agricultural land use is fundamental to the character of our landscapes.
Policies 3.2.5.5.1	Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.
3.2.5.5.2	Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.

Chapter 6 - Landscapes

- 6.3.1 Objective** The District contains and values Outstanding Natural Features, Outstanding Natural Landscapes, and Rural Landscapes that require protection from inappropriate subdivision and development.
- Policies 6.3.1.1** Identify the District's Outstanding Natural Landscapes and Outstanding Natural Features on the Planning Maps.
- 6.3.1.2** Classify the Rural Zoned landscapes in the District as:
- Outstanding Natural Feature (ONF)
 - Outstanding Natural Landscape (ONL)
 - Rural Landscape Classification (RLC)
- 6.3.1.3** That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.
- 6.3.1.4** That subdivision and development proposals located within the Rural Landscape be assessed against the assessment matters in provisions 21.7.2 and 21.7.3 because subdivision and development is inappropriate in many locations in these landscapes, meaning successful applications will be, on balance, consistent with the assessment matters.
- 6.3.1.5** Avoid urban subdivision and development in the Rural Zones.
- 6.3.1.6** Enable rural lifestyle living through applying Rural Lifestyle Zone and Rural Residential Zone plan changes in areas where the landscape can accommodate change.
- 6.3.1.7** When locating urban growth boundaries or extending urban settlements through plan changes, avoid impinging on Outstanding Natural Landscapes or Outstanding Natural Features and minimise disruption to the values derived from open rural landscapes.
- 6.3.1.8** Ensure that the location and direction of lights does not cause glare to other properties, roads, and public places or the night sky.
- 6.3.1.9** Ensure the District's distinctive landscapes are not degraded by forestry and timber harvesting activities.
- 6.3.1.10** Recognise that low-intensity pastoral farming on large landholdings contributes to the District's landscape character.
- 6.3.1.11** Recognise the importance of protecting the landscape character and visual amenity values, particularly as viewed from public places.
- 6.3.1.12** Recognise and provide for the protection of Outstanding Natural Features and Landscapes with particular regard to values relating to cultural and historic elements, geological features and matters of cultural and spiritual value to Tangata Whenua, including Tōpuni.
- 6.3.2 Objective** Avoid adverse cumulative effects on landscape character and amenity values caused by incremental subdivision and development.

- Policies 6.3.2.1** Acknowledge that subdivision and development in the rural zones, specifically residential development, has a finite capacity if the District's landscape quality, character and amenity values are to be sustained.
- 6.3.2.2** Allow residential subdivision and development only in locations where the District's landscape character and visual amenity would not be degraded.
- 6.3.2.3** Recognise that proposals for residential subdivision or development in the Rural Zone that seek support from existing and consented subdivision or development have potential for adverse cumulative effects. Particularly where the subdivision and development would constitute sprawl along roads.
- 6.3.2.4** Have particular regard to the potential adverse effects on landscape character and visual amenity values from infill within areas with existing rural lifestyle development or where further subdivision and development would constitute sprawl along roads.
- 6.3.2.5** Ensure incremental changes from subdivision and development do not degrade landscape quality, character or openness as a result of activities associated with mitigation of the visual effects of proposed development such as screening planting, mounding and earthworks.
- 6.3.3 Objective** Protect, maintain or enhance the district's Outstanding Natural Features (ONF).
- Policies 6.3.3.1** Avoid subdivision and development on Outstanding Natural Features that does not protect, maintain or enhance Outstanding Natural Features.
- 6.3.3.2** Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Landscapes adjacent to Outstanding Natural Features would not degrade the landscape quality, character and visual amenity of Outstanding Natural Features.
- 6.3.4 Objective** Protect, maintain or enhance the District's Outstanding Natural Landscapes (ONL).
- Policies 6.3.4.1** Avoid subdivision and development that would degrade the important qualities of the landscape character and amenity, particularly where there is no or little capacity to absorb change.
- 6.3.4.2** Recognise that large parts of the District's Outstanding Natural Landscapes include working farms and accept that viable farming involves activities which may modify the landscape, providing the quality and character of the Outstanding Natural Landscape is not adversely affected.
- 6.3.4.3** Have regard to adverse effects on landscape character, and visual amenity values as viewed from public places, with emphasis on views from formed roads.
- 6.3.4.4** The landscape character and amenity values of the Outstanding Natural Landscape are a significant intrinsic, economic and recreational resource, such that large scale renewable electricity generation or new large scale mineral extraction development proposals including windfarm or hydro energy generation are not likely to be compatible with the Outstanding Natural Landscapes of the District.

6.3.7 Objective

Recognise and protect indigenous biodiversity where it contributes to the visual quality and distinctiveness of the District's landscapes.

Policies 6.3.7.1

Encourage subdivision and development proposals to promote indigenous biodiversity protection and regeneration where the landscape and nature conservation values would be maintained or enhanced, particularly where the subdivision or development constitutes a change in the intensity in the land use or the retirement of productive farm land.

6.3.7.2

Avoid indigenous vegetation clearance where it would significantly degrade the visual character and qualities of the District's distinctive landscapes.

Chapter 21.7 Assessment Matters (Landscape)

21.7.1 Outstanding Natural Features and Outstanding Natural Landscapes (ONF and ONL).

These assessment matters shall be considered with regard to the following principles because, in or on Outstanding Natural Features and Landscapes, the applicable activities are inappropriate in almost all locations within the zone:

21.7.1.1 The assessment matters are to be stringently applied to the effect that successful applications will be exceptional cases.

21.7.1.2 Existing vegetation that:

- a. was either planted after, or, self-seeded and less than 1 metre in height at 28 September 2002; and,
- b. obstructs or substantially interferes with views of the proposed development from roads or other public places, shall not be considered:
 - as beneficial under any of the following assessment matters unless the Council considers the vegetation (or some of it) is appropriate for the location in the context of the proposed development; and
 - as part of the permitted baseline.

21.7.1.3 Effects on landscape quality and character

In considering whether the proposed development will maintain or enhance the quality and character of Outstanding Natural Features and Landscapes, the Council shall be satisfied of the extent to which the proposed development will affect landscape quality and character, taking into account the following elements:

- a. Physical attributes:
 - Geological, topographical, geographic elements in the context of whether these formative processes have a profound influence on landscape character;
 - Vegetation (exotic and indigenous);
 - The presence of waterbodies including lakes, rivers, streams, wetlands.
- b. Visual attributes:
 - Legibility or expressiveness – how obviously the feature or landscape demonstrates its formative processes;
 - Aesthetic values including memorability and naturalness;
 - Transient values including values at certain times of the day or year;
 - Human influence and management – settlements, land management patterns, buildings, roads.

- c. Appreciation and cultural attributes:
- Whether the elements identified in (a) and (b) are shared and recognised;
 - Cultural and spiritual values for tangata whenua;
 - Historical and heritage associations.

The Council acknowledges that Tangata Whenua beliefs and values for a specific location may not be known without input from iwi.

- d. In the context of (a) to (c) above, the degree to which the proposed development will affect the existing landscape quality and character, including whether the proposed development accords with or degrades landscape quality and character, and to what degree.
- e. any proposed new boundaries will not give rise to artificial or unnatural lines (such as planting and fence lines) or otherwise degrade the landscape character.

21.7.1.4 Effects on visual amenity

In considering whether the potential visibility of the proposed development will maintain and enhance visual amenity values the Council shall be satisfied that:

- a. the extent to which the proposed development will not be visible or will be reasonably difficult to see when viewed from public roads and other public places. In the case of proposed development in the vicinity of unformed legal roads, the Council shall also consider present use and the practicalities and likelihood of potential use of unformed legal roads for vehicular and/or pedestrian, cycling, equestrian and other means of access;
- b. the proposed development will not be visually prominent such that it detracts from public or private views of and within Outstanding Natural Features a Landscapes;
- c. the proposal will be appropriately screened or hidden from view by elements that are in keeping with the character of the landscape;
- d. the proposed development will not reduce the visual amenity values of the wider landscape (not just the immediate landscape);
- e. structures will not be located where they will break the line and form of an ridges, hills and slopes;
- f. any roads, access, lighting, earthworks and landscaping will not reduce the visual amenity of the landscape.

21.7.1.5 Design and density of Development

In considering the appropriateness of the design and density of the proposed development, whether and to what extent:

- a. opportunity has been taken to aggregate built development to utilise common access ways including roads, pedestrian linkages, services and open space (ie. open space held in one title whether jointly or otherwise);

- b. there is merit in clustering the proposed building(s) or building platform(s) within areas that are least sensitive to change;
- c. development, including access, is located within the parts of the site where it would be least visible from public and private locations;
- d. development, including access, is located in the parts of the site where it has the least impact on landscape character.

21.7.1.6 Cumulative effects of subdivision and development on the landscape

Taking into account whether and to what extent existing, consented or permitted development (including unimplemented but existing resource consent or zoning) may already have degraded:

- a. the landscape quality or character; or,
- b. the visual amenity values of the landscape.

The Council shall be satisfied the proposed development, in combination with these factors will not further adversely affect the landscape quality, character, or visual amenity values.

21.7.3 Other factors and positive effects, applicable in all the landscape categories (ONF, ONL and RLC)

21.7.3.1 In the case of a proposed residential activity or specific development, whether a specific building design, rather than nominating a building platform, helps demonstrate whether the proposed development is appropriate.

21.7.3.2 Other than where the proposed development is a subdivision and/or residential activity, whether the proposed development, including any buildings and the activity itself, are consistent with rural activities or the rural resource and would maintain or enhance the quality and character of the landscape.

21.7.3.3 In considering whether there are any positive effects in relation to the proposed development, or remedying or mitigating the continuing adverse effects of past subdivision or development, the Council shall take the following matters into account:

- a. whether the proposed subdivision or development provides an opportunity to protect the landscape from further development and may include open space covenants or esplanade reserves;
- b. whether the proposed subdivision or development would enhance the character of the landscape, or protects and enhances indigenous biodiversity values, in particular the habitat of any threatened species, or land environment identified as chronically or acutely threatened on the Land Environments New Zealand (LENZ) threatened environment status;
- c. any positive effects including environmental compensation, easements for public access such as walking, cycling or bridleways or access to lakes, rivers or conservation areas;
- d. any opportunities to retire marginal farming land and revert it to indigenous vegetation;
- e. where adverse effects cannot be avoided, mitigated or remedied, the merits of any compensation;

- e. whether the proposed development assists in retaining the land use in low intensity farming where that activity maintains the valued landscape character.