

Plan Change 29 – Addendum to the Section 42A Report

Open Space zoning at Station Bay – Lakeside Drive, Takapō / Lake Tekapo

1. This addendum relates to the submission by Tekapo Springs (29.01) that the SARZ zoning be extended to include neighbouring properties, for consistency with the submitter's property. This includes a further strip of land running along the west/southwest of Tekapo Springs (marked as Area A in the submission – copied below), as well as a strip of land extending from the eastern boundary of the site out to the lakefront (marked as Area B in the submission – copied below). Area A also falls within part of the land which TLGL (10.02) seeks is rezoned from OSZ to SARZ, but subject to a reduction in the building coverage standard (SARZ-S4). In the s42A Report, I stated that I considered that the change in zoning sought by Tekapo Springs could result in a higher level of built form than would be appropriate in this location, and that I therefore considered a landscape assessment would be required. As noted (in paragraph 61), the submitter provided a draft landscape assessment immediately prior to the circulation of the s42A Report, and therefore there had not been time for a peer review to be undertaken. Consequently, no recommendation was made on the rezoning in the s42A Report.



2. Since that time, the Council's landscape architect (Ms Bron Faulkner) and myself met with the submitter's planner and landscape architect (on 7th May) to discuss the draft landscape assessment. The submitter then formally lodged landscape evidence on 9th May. Ms Faulkner has undertaken a review of the evidence lodged and provided comments on it, in the attached memo. The purpose of this addendum report is to provide the Panel with an update on my recommendations arising from her review.
3. In short, Ms Faulkner supports rezoning Area A to SARZ, with the 40% building coverage limit applying in this area. I accept her advice and therefore recommend that Area A as identified in the Tekapo Springs (29.01) submission be zoned SARZ, and included in the recommended Specific Control Area XX (Tekapo Springs). A consequence of this is that this area would no longer be included in Specific Control Area YY (Station Bay).
4. I note that this area formed part (but not all) of the area sought by TLGL (10.02) to be rezoned SARZ, but subject to a lower building coverage being applied. In terms of s32AA, I have therefore already assessed the change in zoning (in paragraph 67 of the s42A Report). In terms of the

change now recommended – which would apply a higher building coverage to Area A – I accept the advice of Ms Faulkner that the narrow configuration of this area means that it could accommodate a similar type and level of development that currently exists within Tekapo Springs without impacting the nearby residential zone; it would constitute a relatively small expansion of the Tekapo Springs development; and that the increased development that would be enabled would be partially countered by this area still being contained within the developed footprint of the wider tourist/recreation area along Lakeview Drive. I therefore consider that the change would be consistent with SARZ-P5.1 and SARZ-O2.1, as the level of built form enabled would not be dominant in the surrounding environment and would remain consistent with the landscape character of the surrounding area.

5. In terms of Area B, Ms Faulkner considers that this area has a high sensitivity to a change in land use, and low capacity to absorb change, given its lakeside location and the undeveloped landscape context in which it lies. However, she considers that the sensitivity to change increases from west to east, and consequently there is some capacity for development to occur adjacent to Tekapo Springs. Detailed reasons for this area set out in her memo. She therefore recommends that only part of Area B be rezoned to SARZ, with the remainder being retained OSZ. She states that this would contain more intensive development close to the Tekapo Springs, containing the effects close to the existing infrastructure and the more developed inner bay area, while retaining the undeveloped character at the outer extent of Area B. Having considered Ms Faulkner's recommendations and the reasons for it, I recommend that the area identified by Ms Faulkner – shown in blue outline below – be zoned SARZ, and included in the recommended Specific Control Area XX (Tekapo Springs).



6. I consider that rezoning this area from OSZ to SARZ will allow for greater economic development opportunities for this site than the OSZ does, and that in turn, it will allow for the site to be developed in a manner that aligns with SARZ-O1 and SARZ-O2. I consider that this aligns with ATC-O1.1 in terms of providing a greater range of recreation activities, and that based on Ms Faulkner's advice, the rezoning would integrate into and respect the values of the surrounding natural environment in this area, aligning with NE-O1 and UFD-O1.1. I consider that retention of OSZ over this land would allow for the land to be developed and used in a way that aligns with OSZ-O1; but that it would not allow for the expansion of recreation activities into this area to the same degree as an SARZ zoning would. Overall, I therefore consider that the SARZ zoning is more appropriate to assist in achieving the outcomes sought for open space and recreation zones and the relevant Strategic Directions in the Plan.

Attn:	Liz White	Project Ref:	MDC PC 29
Company :	On behalf of Mackenzie District Council		
Date:	19 May 2025		
From:	Bron Faulkner, Landscape Architect		
Subject:	Response to Landscape Evidence Submissions PC29.10 and PC29.29 - PC29 Rezoning Requests		

Qualifications and experience

1. My name is Bronwyn Elizabeth Faulkner. I am an independent consultant landscape architect, with 22 years of experience in professional landscape practice. My experience includes; providing landscape expertise on a wide range of projects in particular large scale infrastructure projects, subdivisions and restoration projects. My work has been largely focused on the preparation of landscape and visual assessments to support resource consent and plan change applications as well as design and project management roles during the design and construction phases of projects. I have been a consultant landscape architect for Mackenzie District Council for three years.
2. I am a Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA) Registered Landscape Architect.

Code of Conduct for Expert Witness

3. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of Evidence

4. I have been engaged by Mackenzie District Council (MDC) to review and comment on the landscape evidence provided for submission # 10 from Tekapo Landco Ltd and Godwit Leisure Ltd (TLGL) and for submission #29 from Tekapo Springs Ltd.

Tekapo Landco Ltd and Godwit Leisure Ltd, Submission #10

5. I undertook a peer review¹ (17 March 2025) of the landscape assessment that was prepared by Mr Richard Tyler in support of this submission. I have subsequently reviewed his evidence dated 9 May 2025. I confirm that Mr Tyler's evidence is consistent with his earlier landscape assessment and that I therefore have no additional comments to make on his evidence.

Tekapo Springs Ltd, Submission #29

6. Landscape evidence for this submission has been prepared by Naomi Crawford. I have reviewed an earlier draft of her evidence dated 22 April 2025. I provided verbal comments on this draft evidence during a Teams meeting with Ms Crawford, Mr Geddes and Ms White on 7 May 2025.

¹ PC29 s42A Report - Appendix 3

Subsequently I have reviewed Ms Crawford's evidence for this hearing (8.5.2025) and Mr Geddes' statement of evidence (9.5.2025)

7. The key issue addressed in my evidence is whether, from a landscape perspective, expansion of the proposed SARZ in two areas of land adjacent to Tekapo Springs is appropriate in these locations. I refer to these areas as Area A and Area B as per the plan below, taken from the submission.



Figure 3 from Mr Geddes' evidence

Rezoning Area A to SARZ

8. The submission seeks to expand the proposed SARZ on the Tekapo Springs site further west/southwest (Area A). From my reckoning area A is approximately 60m-70m wide, and wraps around 250m of the Tekapo Springs boundary. It overlays the area discussed in TLGL submission that seeks to rezone the proposed OSZ to SARZ, but with a reduced building coverage of 10%. As per my earlier review of the TLGL submission, I supported the proposed SARZ (which would include Area A from the Tekapo Springs submission) with reduced building coverage, on the grounds that 40% building coverage on this area of steeply sloping land would be an overly intensive built environment which would be inappropriate and potentially visually obtrusive from Lakeside Drive.
9. It is difficult to anticipate the nature or feasibility of any future development of this narrow strip of sloping land, other than expansion of the existing Tekapo Springs activities. Rezoning Area A to SARZ would result in a potential extension of the Tekapo Springs development that would be adjoined to the west by SARZ with reduced site coverage², which in turn separates Area A from the MRZ beyond. From a landscape perspective, the narrow configuration of the area adjoining two of Tekapo Springs boundaries could accommodate a similar type and level of development that currently exists within Tekapo Springs without impacting the nearby residential zone. From a visual and character perspective it would constitute a relatively small expansion of the Tekapo Springs development, and would increase the intensity of development in this general area. The effects of extending this development into Area A are partially countered by the fact that the increased development is still contained within the developed footprint of the wider tourist/recreation area along Lakeview Drive.

² As per relief being sought by the TLGL submission #10

Conclusion Area A

10. I consider that rezoning Area A to SARZ (including application of the 40% building coverage limit) is appropriate given its physical relationship to Tekapo Springs and that it is contained within the existing developed footprint of the Lakeview Drive tourist/recreation area. I therefore concur with Ms Crawford's conclusion regarding Area A.

Rezoning Area B to SARZ

11. The Submission seeks to rezone Area B from OSZ to SARZ. Ms Crawford concludes that the SARZ zoning is appropriate in '*part of*' this area³ although she provides no discussion or rationale for this in the body of her evidence, which on the contrary seems to support SARZ for the whole area.
12. I consider that the particular sensitivities of Area B are different and of a higher order than for Area A and therefore an assessment of potential landscape effects of any rezoning needs to be considered in the context of the site-specific characteristics.
13. Area B is narrow land parcel that extends approximately 370m along the lake frontage east of Tekapo Springs. It is approximately 1.4Ha of steeply sloping land with its width ranging from 35m to 50m. The Area B boundary where it adjoins Tekapo Springs is approximately 72m. Mature conifers occupy most of the area.
14. Area B's high sensitivity to a change in land use is largely due to its lakeside location and the undeveloped landscape context in which it lies. The eastern part of Area B has a higher level of sensitivity than the western part given its greater distance from existing development. And closer proximity to the headland. The factors contributing to Area B's high sensitivity to change/low capacity to absorbed change area as follows:
 - a) Location at the foot of the slope adjoining the lake shoreline and the public access along the lakeshore immediately below the site. Any increased activity in the area will be experienced from close proximity by the recreational users of the lakeshore, and more-so toward the eastern end where Area B is very close to the lakeshore.
 - b) High visibility of the area on the elevated slope that lies across the line of view for people in the bay / Lakeside Drive area. In particular, new development at the eastern end, toward the headland will be more visible, to a larger viewing audience along Lakeside Drive and the lake shore of the inner bay.
 - c) Adjacency to Lake Tekapo ONL
 - d) Area extends well beyond (east) the existing developed part of the bay and is almost fully enclosed by undeveloped OSZ and GRUZ with the exception of the short boundary with Tekapo Springs.
 - e) The elevated land is contiguous with the lake and lakeshore contributing to the lakeside setting as a whole, which in my opinion retains moderate-high level of natural character, because it is unmodified, there are not manmade features, albeit the trees are exotic species.

The sensitivity to change of the area increases from west to east, being less sensitive to change in close proximity to the Tekapo Springs boundary and more sensitive at the eastern end. Given this, I consider that there is some capacity for development to occur adjacent to Tekapo Springs.

³ 61 (d) conclusions

15. Ms Crawford has provided comments in her evidence (para 42-44) to points that I raised at our meeting on 7 May 2025 regarding suitability of Area B for rezoning to SARZ given what I regard as the site's sensitivity to development. Generally, I do not agree with Ms Crawford's comments.

Ms Crawford evidence Para 41-44	My Comments
<p><i>43 (a) Most of this area, except a very small part of the north-eastern end, is located outside the 25-metre setback specified in Variation 1 to Plan Change 23 (Natural Character chapter). Footnote: Without a specific Proposal to review, it is very difficult to undertake a natural character assessment. As such, I cannot definitively say what the effect on natural character could be.</i></p>	<p>I agree that without a specific development proposal it is difficult to assess the effects on natural character, but in this case where rezoning is proposed I would assume the permitted activities of the proposed SARZ zone are what should be assessed as a worst case scenario, i.e. 40% built coverage and 8m height limit. Regardless, I consider that buildings or structures on this site would be detrimental to the natural character of the lake side setting, because buildings /structures would be easily visible on the slope and negatively alter peoples' experience of the natural elements, patterns and processes.</p>
<p><i>43(b) The land is steep, other than the flatter area at the base of the hill and edge of the lake (which is located south of the land parcel in question). The topography in itself limits future development potential.</i></p>	<p>The steep and narrow site is unsuitable for buildings and most development would necessitate significant earthworks for building platforms and access. Therefore, a no or low built density zoning (OSZ) is more appropriate than SARZ.</p>
<p><i>43(c) The area is viewed in the shade for most of the day. This means there is a lower contrast, colours appear darker, and there is reduced brightness. New elements would also be viewed this way and absorbed into the background easier than if they were viewed in full or partial sun.</i></p>	<p>In my opinion the mature conifers on the site cannot be considered a permanent feature/mitigation as there is no guarantee that they will be retained. At some stage they will reach the end of their life or need to be removed for public safety reasons, or perhaps burn/blow down, and they may even be considered a safety risk for any development of the site. The site does face south and would often be in the shade but without the tall trees, the shading effects would be much reduced and morning sun during summer months will light these slopes.</p>
<p><i>43(d)The area is adjacent to an already developed area. This is in contrast to an area which may have no development or built form nearby.</i></p>	<p>With the exception of the short 72m long boundary with Tekapo Springs the site is entirely surrounded by undeveloped land, GRUZ and OSZ. Expanding SARZ on this slither of land will constitute an incongruous elongated shaped extension of development into an undeveloped area.</p>
<p><i>43(e) Any new development could be integrated within the trees, using them to help soften and screen structures or built form.</i></p>	<p>Refer (c) above. And we cannot be sure that trees on the site or on neighbouring land upslope of the boundary would be able to</p>

	retained as part of any development for example, due to safety risks.
44 When considering how this 'finger' of land is viewed from around Lake Tekapo:	
(a) The proposed area occupies the lowest part of the southern face of Mt John. It is viewed as one part of the much taller and wider headland, which is part of the wider lake environment. (i) Looking at specifics, the proposed SARZ would occupy up to 46 metres elevation of the 341-metre-tall hillside. Any future development would also be seen in this way, occupying the bottom 13.5% of the hillside as viewed from the majority of the surrounding viewpoints	I agree from a distance Area B makes up a small proportion of the view from the top of Mt John to the lake. But if the mature trees were not retained, then development on Area B would be visible from here.
(b) When viewed from approximately 2 kilometres across Lake Tekapo from the Sheep Dog Memorial (illustrated by Figure 3 provided earlier in this evidence), the treed slopes of the hillside above dominate. The area at the bottom of the hill is more recessive being in the 'crease' between the turquoise blue lake edge and the very dark green forested hillside.	I agree from a distance Area B makes up a small proportion of the view from the top of Mt John to the lake. But if the mature trees were not able to be retained, then development on Area B would be visible from here.
(c) When the area is viewed from approximately 500 metres away at the 'beach' (refer to Figure 5), again the scale and treed character of the hillside dominates. The lake level also plays a part in the visibility of the foreshore.	Ditto my comments above about the trees. Development of Area B would be easily visible from here and based on my estimate would extend eastward to about the white line. From this distance any development would appear as an extension well beyond the Tekapo Springs extent.



Figure 5 from Ms Crawford's evidence, view from 500m – The white line is my addition, an estimate of how far the east the Area b land parcel extends



Figure A View from approximately 250m, white line shows my estimated eastern extent of Brea B

16. From this location any development would be easily visible and potentially prominent, appearing to extend well along the headland into the undeveloped landscape. From locations left of this viewpoint development would appear even closer to the end of the headland.
17. I consider the expansion of SARZ zoning and the resulting development within Area B would extend buildings and other infrastructure too far beyond the developed inner bay area along the undeveloped lakeshore. I also do not agree that the mitigating factors of the existing environment put forward by Ms Crawford (in the tables above) would effectively reduce the adverse visual and landscape character effects of permitted SARZ activity.

Potential Design Controls

18. Ms Crawford's evidence identifies the plan provisions that would control the design aspects of development in a SARZ (at para 48) "*...the objectives and policies of the SARZ together with the PREC1 overlay and landscape plan will work to maintain the identified landscape character and values of the area*". I outline the design controls referred to by Ms Crawford below;
19. SARZ Provisions; SARZ enables site coverage up to 40%, and building height max of 8.0m. The submission proposes the inclusion of Specific Control Area (Tekapo Springs) with additional design controls SARZ-02 and SARZ-S7

SARZ-02

(3) in relation to Specific Control Area XX (Tekapo Springs):

- a. aligns with Objective PREC1-O1 and Policy PREC2-P1 of the Tekapo Precinct; and*
- b. maintains a balance of open space and built form; and*
- c. is sympathetic to the landscape; and*
- d. uses landscaping to mitigate the adverse effects of built form, help buildings integrate with the landscape and contribute to the amenity values of the area.*

SARZ-S7 Landscaping- Requires a landscape plan be prepared and submitted to MDC for approval for buildings 50m² and bigger.

PREC1-Takapo /Lake Tekapo Precinct design controls are intended to ensure that development is sympathetic to the character of the town and the surrounding landscape including controls on building cladding, colours and reflectivity.

20. These design controls will assist with visual integration of buildings with their landscape setting in some situations. However, the visual and landscape effects of the buildings themselves, at the permitted 40% density across all of Area B cannot, in my view, be sufficiently mitigated on this highly visible site using these design controls. I consider the most effective mitigation would be to minimise the built density particularly in the eastern part of the area through the more appropriate OSZ.

Recommendation - Split Zoning in Area B

21. OSZ anticipates a much lower level of built form than SARZ and is required to maintain a predominance of open space. I consider that changing the zoning of Area B to SARZ would result in a higher level of built form than is appropriate in this particular location. However, as noted above, the sensitivity of this area to development is highest at its eastern end and reduces towards the Tekapo Springs boundary. I consider that there is scope to rezone a western portion of Area B to SARZ with the eastern part remaining as OSZ. Refer to **Figure B** below.



Figure B Recommended extent of SARZ in Area B

22. This option would contain more intensive development close to the Tekapo Springs thus containing the effects close to the existing infrastructure and the more developed inner bay area. Retaining OSZ at the outer extent of Area B will retain its undeveloped character. More intensive development within the OSZ is not precluded, but would require detailed consideration through a consenting process. This cautionary approach is appropriate for this sensitive part of the lakeshore setting.

23. Ms Crawford does not discuss a split zone option in her evidence other than to mention it in (d) of her conclusion, *The neighbouring areas to the west and south and part of the area to the east of Tekapo Springs could support increased site coverage up to 40%.* (underlining mine). I am assuming that the 'part of the area to the east' she refers to is the portion adjacent to Tekapo Springs that I have identified as suitable for SARZ zoning.

Comments on amended provision SARZ-S7

24. A new standard SARZ-S7 is proposed to require a landscape plan be prepared and approved for any new buildings with gross floor area of 50m² or more in Specific Control Area XX (Tekapo Springs). While the standard requires "approval" from MDC it is not clear what the approval would entail or what landscape outcomes would form the basis for approval. In addition, I am not sure how its appropriateness could be verified through a permitted activity framework. I consider that the landscape plan should be required to achieve the outcomes defined in SARZ-O2, possibly as a matter of discretion.

Conclusions

I support rezoning of Area A along the west and south-west boundary of Tekapo Springs to SARZ.

I recommend a spilt zoning of Area B, east to Tekapo Springs, comprising SARZ in the portion adjacent to Tekapo Springs (refer Figure B above) with the balance remaining OSZ.

I recommend a refinement of the proposed wording of SARZ-O2 and SARZ-S7 to ensure the landscape design outcomes sought are well defined and are required to be achieved in a landscape plan.

Bron Faulkner

NZILA Registered Landscape Architect