

Before the Independent Hearing Panel
appointed by Mackenzie District Council

Under the Resource Management Act 1991

In the matter of Plan Change 29 to the Mackenzie District Plan

Summary Statement and Rebuttal Evidence of Naomi Louise Crawford

27 May 2025

Introduction

- 1 My name is Naomi Louise Crawford.
- 2 I prepared a statement of evidence dated 8 May 2025. My qualifications and experience are set out in that statement of evidence.
- 3 I repeat the confirmation given in that statement that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court.
- 4 I have been involved with Mackenzie District Council's (**MDC**), Plan Change 29 (**PC29**) to the Mackenzie District Plan (**MDP**) since March 2025.
- 5 My role has been to provide landscape and visual advice to Tekapo Springs Limited (**Submitter**) in relation to the possibility of extending the Sport and Active Recreation Zoning (**SARZ**) to incorporate the neighbouring properties to the south, west and east of their site.

Matters Raised in the Plan Change 29 – Addendum to the Section 42A Report

- 6 I received an addendum to the Section 42A (**s42A**) report from Ms Liz White of MDC on the 23 May 2025. Appended to this was landscape evidence from Ms Bron Faulkner (MDC nominated Landscape Architect). The PC29 s42A addendum recommended that:
 - (a) Area 'A' be rezoned to SARZ and included in the Specific Control Area (Tekapo Springs) as illustrated below.
 - (b) A portion of Area 'B' nearest to Tekapo Springs is rezoned to SARZ, with the remainder retained as Open Space Zoning (**OSZ**).



- 7 I concur with the findings of the PC29 addendum to rezone Area 'A' from OSZ to SARZ with a 40% building site coverage. I believe this area is addressed sufficiently in my earlier Statement of Evidence (8 May 2025), so I will not address this matter any further.
- 8 I believe the outstanding issue is the land to the east of Tekapo Springs (Area 'B'). The remainder of my summary statement focuses on addressing this area.

Matters raised in evidence of Ms Faulkner

- 9 Area 'B' is a narrow parcel of land, 1.4ha in size, that extends approximately 370m along the lake frontage east of Tekapo Springs, within an inner bay area. There are small, cleared areas of conifers which have been selectively removed (possibly windblown), with the remainder of the area covered in forestry.
- 10 I received landscape evidence from Ms Faulkner on 23 May 2025, two working days prior to this hearing. Both Ms Faulkner and I agree that without a specific proposal to review, it is difficult to assess what the effects of SARZ on Area 'B' would be, other than to look at the 'worse case' scenario. This sits alongside the fact that the OSZ already allows a low level of development within this area.¹
- 11 In relation to the Area 'B' land to the east of Tekapo Springs:
 - (a) I agree that the particular sensitivities of this land are different to Area 'A'.
 - (b) I acknowledge that this sensitivity to change is due to its lakeside location and the undeveloped context (forestry plantation) within which it is situated.
 - (c) I acknowledge that the mature conifers on the site cannot be considered a permanent feature.
 - (d) I also agree that the sensitivity to change increases from west to east, being less sensitive to change close to Tekapo Springs and more sensitive nearer the headland.
- 12 However, I believe that the landscape has a **slightly higher capacity to absorb change** and that the **effects on visibility are slightly less** than that of Ms Faulkner. This is due to:²
 - (i) The area being not far from the already developed area of Tekapo Springs. In time, new development would be viewed as an extension of this area.
 - (ii) The land being steep and the topography limiting future development potential, with excavation and retaining being costly.
 - (iii) The area being viewed in the shade for large parts of the day. This would largely continue regardless of whether the forestry remains, however the darker background has a greater absorption capacity.

¹ This includes including building coverage of 5% or 100m² (whichever is less).

² The following points were also included under paragraphs 41 to 46 of my original evidence.

- (iv) Any new development possibly being able to be integrated amongst the trees, assisting in softening and screening-built form.³
- (v) Any new development being contained within the inner bay area and not encroaching beyond the headland.
- (vi) The area being viewed as one part of the much taller and wider headland, which is part of the wider lake environment.
- (vii) Only part of the southern face of Mt John being SARZ. It would occupy the first 46m elevation of the 341m tall hillside (13.5%).

Moving forwards

13 In Ms Faulkner's evidence she suggests splitting the zoning in Area 'B': "*I consider there is scope to rezone a western portion of Area B to SARZ, with the eastern part remaining as OSZ.*"⁴ She states that this option would contain the more intensive development close to Tekapo Springs thus containing the effects close to the existing infrastructure and the inner bay area.⁵

14 Whilst I agree that rezoning only part of the area as SARZ (and the remainder as OSZ) is one way forward which would maintain the identified landscape and character and values, Tekapo Springs have suggested alternative design controls for the remainder (eastern side) of Area 'B'. These include:

- (a) A maximum building height of 5.5m (as opposed to 8m). This would limit building height to a single story.
- (b) A site coverage of 30% (as opposed to 40% under the SARZ, or 5% or 100m² (whichever is the lesser) under the OSZ).⁶
- (c) The adoption of a Landscape Plan that would require 20% of the site to be landscaped.

15 These suggested measures are more stringent than typical SARZ and would sit alongside the requirements of the PREC1 overlay and suggested Landscape Plan. This includes the use of recessive colours, sensible use of glass (glint and glare mitigation), careful building and structure placement (balance of open space and built form) and appropriate design and roof pitch. Landscaping would assist to mitigate the adverse effects of built form and help to integrate the changes into the landscape.

³ The lifespan of the trees is currently unknown.

⁴ Para 21.

⁵ Para. 22.

⁶ For comparison, the existing Tekapo Springs site has a site coverage of 28%. This calculation does not include parking areas but does include the slide.

Conclusion

16 In summary, I believe that both options presented (either reducing the extent of the SARZ or decreasing the site coverage and build height) would assist to preserve the more sensitive eastern end of Area 'B'. With Ms Faulkner's option being more conservative and responsive to her views of increased visibility and less capacity to absorb change, than mine.

Naomi Louise Crawford

Dated this 27 day of May 2025



Figure 3: Looking northwest towards Tekapo Springs (2km away) from 'The Sheepdog Memorial'. Panorama taken on the 11th of April 2025 using an OM System OM-5 camera with a 25mm lens (equivalent to a 50mm focal length). This is a public viewpoint.

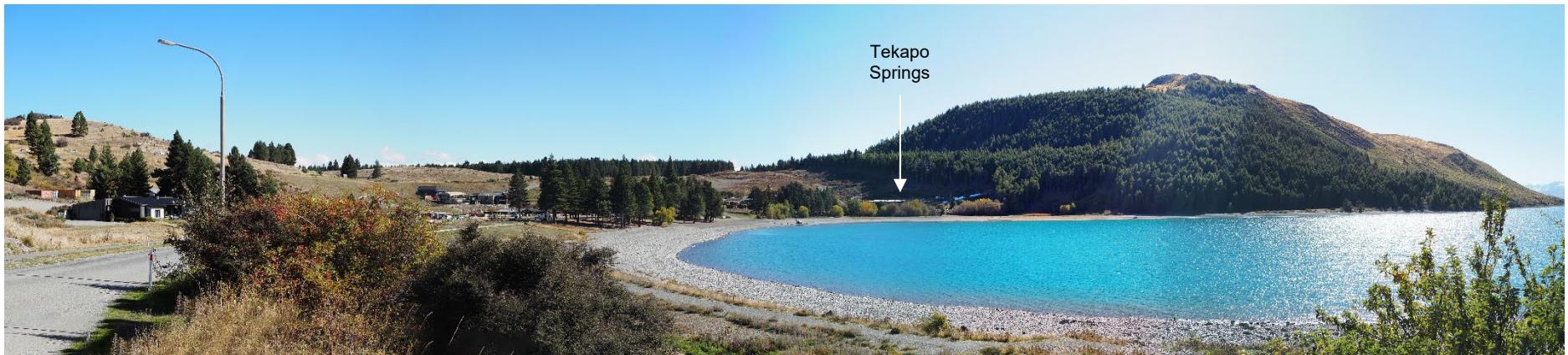


Figure 4: Looking northwest towards Tekapo Springs (850m away) from midway along Lakeside Drive. Panorama taken on the 11th of April 2025 using an OM System OM-5 camera with a 25mm lens (equivalent to a 50mm focal length). This is a public viewpoint.



Figure 5: Looking northwest towards Tekapo Springs (500m away) from the foreshore of Lake Tekapo. Panorama taken on the 11th of April 2025 using an OM System OM-5 camera with a 25mm lens (equivalent to a 50mm focal length). This is a public viewpoint.



Figure 6: Looking west towards Tekapo Springs from the carpark (100m from the building). Panorama taken on the 11th of April 2025 using an OM System OM-5 camera with a 25mm lens (equivalent to a 50mm focal length). This is a public viewpoint.