

THE RESOURCE MANAGEMENT ACT 1991

MACKENZIE DISTRICT PLAN

PROPOSED PLAN CHANGE 13

INCORPORATION OF
LANDSCAPE FEATURES
INTO THE DISTRICT PLAN

TECHNICAL REPORT L1

**LANDSCAPE ASSESSMENT
OF ISSUES ARISING FROM
PUBLIC SUBMISSIONS
& FURTHER SUBMISSIONS**

FINAL

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ANZILA
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AUGUST 2008

**Note:
Recommendations in this report do not constitute the Council's decision
unless accepted.**

This report analyses submissions to Plan Change 13 to the Operative District Plan for Mackenzie District. It is prepared under Section 42A of the Resource Management Act 1991.

The purpose of this report is to assist the Hearings panel in evaluating and deciding on submissions made on the Plan Change, and to assist submitters in understanding how their submission relates to the planning process.

This report may include recommendations to accept, accept in part, or reject points made in submission or requests to amend the District Plan.

These recommendations are the opinion of the reporting officer only. The Hearings Panel will decide on each submission after hearing and considering all relevant submissions, the officers reports, and the Council functions and duties under the RMA, including S.32 of the Act.

INTRODUCTION

1. My name is Graham Densem. I am a landscape architecture consultant on my own account. I hold a Bachelors Degree in Geography and a post graduate Diploma in Landscape Architecture, and am a full member of the New Zealand Institute of Landscape Architects. I have practised landscape architecture for over 30 years.
2. I have been engaged by the Mackenzie District Council to prepare this technical report on submissions to Plan Change 13.

Background

3. I was engaged by the Council in 2006 to present strategies and issues concerning the potential impacts of development on the landscape of the Mackenzie Basin. A discussion paper was presented to the Council in May 2007 and, following discussions with run holders, *'The Mackenzie Basin Landscape: character and capacities'* study was presented in November 2007.
4. This forms the basis of much of Plan Change 13, which was subsequently prepared and notified by the Council, although noting the Council did not adopt all recommendations of the study and the Plan Change represents the Council's interpretations of my study.
5. *The Mackenzie Basin Landscape: character and capacities* study is available on line at the Mackenzie District Council website. Henceforth it is referred to in this report as 'the Landscape Study'.

This Assessment

6. This technical report now considers landscape issues arising from public submissions and further submissions to Plan Change 13. It is supplementary to the planners report being prepared for the Council by Patricia Harte. It considers issues of landscape character and landscape impact arising from the submissions and further submissions and as such is a technical contribution to her overall recommendations.
7. It is emphasized the recommendations herein represent my professional opinion. They are intended to present views which may assist submitters and the panel in the forthcoming hearing. It is appropriate for submitters to refer to this report in evidence presented to the panel.
8. Any conclusions reached or recommendations made in this report are not binding on the hearing panel, who are free to reach the same or different conclusions, having considered all the evidence.
9. In the following assessments the submissions are grouped according to geographical area or issues, as seems appropriate. Only those submissions which raise specific landscape issues are considered in this report.

Landscape Sub-Area Identification

10. The 'Landscape Study' defined a series of 'Landscape Sub-Areas' in Map 8, and which also are shown in Appendix R of Plan Change 13. These will frequently be referred to in this report.
11. To assist identification the Landscape Sun-Areas have now been numbered 1 – 25, as shown on a map in Attachment 1 at the end of this report.

Order of Consideration

12. This report will consider submissions in the following groups:
 - A. New Nodes Requested - *paragraphs 13 – 98;*
 - B. Capacity for New Nodes (Appendix R) - *paragraphs 99 - 163*
 - C. Identified Building Nodes (Appendix S) - *paragraphs 164 - 196*
 - D. Recognition of the Mackenzie Basin - *paragraphs 197 – 216*
 - E. Reflectivity - *paragraphs 217-226*

A: NEW NODES REQUESTED

13. This section considers the following submissions:
 - 10 Rhoborough Downs Ltd
 - 11 Ruataniwha Farm Ltd
 - 43 S.Preston
 - 69 Haldon Station

78	M.&E. Lindsay
82	Hocken Lane Landowners Assn.
83	Fountainblue Ltd & others
125	K. Simpson

10 Rhoborough Downs Ltd

14. In regard to Map 8 'Capacity For New Nodes' in the Landscape Study, this submission seeks:
 - (i) deletion of 'X' symbol ('area where no new nodes are suitable') from area south of Pukaki Information Centre (Wardell Block), that the area be coded a 'Landscape Sub-Area'; that building nodes be assigned, and that provision also be made for a township or settlement.
 - (ii) extension of 'Landscape Sub-Area 6' in area between State Highway 80 and Lake Pukaki and provision for 'sufficient nodes to permit sustainable development';
 - (iii) extend 'Landscape Sub-Area 7' within an area of wilding trees west of State Highway 80 and allocate a number of development nodes
15. Capacity for new nodes was not based solely on ability to visually absorb developments, such as in gullies or areas of wilding trees. It also was based on the ability as far as possible to retain the sparsely occupied character of the Mackenzie landscape during development. To this end the system of defined nodes has been proposed under Plan Change 13, but with sufficient non-settled areas between them to maintain the sparse character of the area.
16. However in some areas with little capacity to absorb development, it is proposed that no nodes are established, in order to maintain openness in that area.
17. The submission points (i) – (iii) above will be discussed in reverse order.

Issue (iii): Sub-Area 7 (Area west of State Highway 80)

18. On Map 8 of the Landscape Study, 'Capacity for new Nodes', the Rhoborough Downs – Pukaki Downs area indicates a potential for 9 new nodes collectively in Landscape Sub-Areas 6 - 8. My expectation was that these potential developments would be distributed between the two properties within the sub-areas indicated, and that other areas on Rhoborough would remain without residential developments and in their existing farmed state.
19. The submitter's plan appears to propose '*100 max number of new nodes*', although the distribution of these is not clear, and it may be a misreading of the plan. If my interpretation is right, this number of nodes would lack the restraint intended in the nodal approach, particularly in the 'uncoloured' areas of Map 8, and would in my view result in large scale conversion of Rhoborough Downs from a farmed landscape character to a residential one.
20. The Council's approach under Plan Change 13 is to initiate a different forms of rural development than the '4 hectare' approach that has evolved in other parts of rural New Zealand. In particular, the approach seeks that the expansive 'high country' mode of farming might continue as the dominant land use, but in

combination with restrained levels of residential development. My opinion is that developing 100 new residential nodes on Rhoborough Downs would not be compatible with this approach.

21. It was not the intention on Map 8 that Rhoborough Downs Ltd have no opportunity to establish new nodes in sub-area 7, west of State Highway 80. It is accepted there is capacity here to absorb developments visually, although this is not as great as it may seem if the need to maintain the sparse rural landscape character and highway character also are factored in. Sub-area 7 (Map 8) indicates my conclusion as to the development potential arising from consideration of these three factors combined, although I am unable to comment on its allocation between the two properties Rhoborough Downs and Pukaki Downs within sub-area 7.
22. My opinion remains that the stated capacity of 3 new nodes in sub-area 7 would be the maximum that clearly retained existing landscape values under the Council's policy, bearing in mind that the Council is also allocating an 'Identified Building Node' within this sub-area, on Pukaki Downs.

Inappropriate Areas

23. There are areas of Rhoborough Downs west of State Highway 80 that I believe are unsuitable for development. In particular I refer to the area west of the State Highway 8 / 80 intersection which has a very high public profile, is an area of tourist attention because of the turnoff to Mount Cook/Aoraki, and currently affords a wide arc of scenic outlooks to the west and south. In my opinion, residential nodes, or for that matter development of any sort, would be inappropriate in that highly sensitive location or arc of view.
24. This also refers to the open areas south of the Rhoborough Downs 'Identified Building Node', which are integral to the general openness of views in the SH80 turnoff-Twizel-Ben Ohau Range area. See Photograph 29 in the Landscape Study.
25. These two areas approximate the area of 'High Visual Vulnerability' on Map 5 of the Landscape Study.

Conclusion, Issue (iii)

26. My conclusions are (a) that the best locations for residential developments in sub-area 7 west of State Highway 80 are indeed in the wilding tree areas, as indicated by this submission, and (b) that for Rhoborough Downs the Council should maintain the 'Area Where No New Nodes are Suitable' as shown in Map 8 of the Landscape Study, noting the particular importance of the State Highway junction area, from a public perspective.

Sub-Area Boundaries

27. Given the large scale of Map 8, I would have no objection to more precisely defining the boundaries of the Landscape sub-area (pink area) should there be confusion as to its extent on Rhoborough Downs.

Criteria for Positioning Nodes

28. In positioning and approving any node in Sub-area 7, the Council should also take into account potential developments on the opposite side of State Highway 80, to ensure the highway does not come to be 'lined' with nodes on both sides and thus, de facto, assume the character of a settlement. The best way to ensure this would be to keep nodes well back from the road on the west side, where there is scope to do so, to ensure that no nodes are directly opposite each other on the highway, and to ensure they are widely spaced along the highway, referring to entrances as well as the nodes themselves.
29. *I recommend*
- (i) *that the Council accepts this part of Submission 10(iii), and allocates up to two 'New Nodes' (of the three noted for Landscape sub-area 7), on Rhoborough Downs land;*
 - (ii) *that the Council not accept the request to extend Sub-area 7 or to decrease the 'Area Where No New Nodes are Suitable' in the south of Rhoborough Downs, but should retain the extent of Sub-Area 7 as proposed in Map 8, subject to delineation of the boundary on site if necessary, and;*
 - (iii) *that the Council pay particular attention to the siting of any Nodes provided for in Sub-area 7 on Rhoborough Downs, to minimize effects on State Highway 80.*

Issue (ii): Sub-Area 6, Lake Block

30. Regarding the land between State Highway 80 and Lake Pukaki (Lake Block, part Sub-area 6), I have visited the site of the proposed homestead with Mr Preston and am generally familiar with the land. My opinion is that limited further development could occur in this area without affecting landscape values, so long as this does not impact on the values of the lake or highway.
31. I therefore would support the Council in providing for one node within the Rhoborough Downs boundaries in this area, in addition to the proposed homestead. However I am of the opinion that the area in Rhoborough Downs ownership on this side of the highway is not large enough for more than one node.
32. The submission also requests that the whole of this block be 'shaded in pink', referring to 'Landscape Sub-Areas 6' on Map 8.
33. My understanding is that all land in Rhoborough Downs ownership east of State Highway 80, between Pukaki Downs in the north and the 'Fisher' Block to the south, is within Landscape Sub-area 6. If this is not so, then it was intended to be. See air photo in Attachment 2
34. I am unsure if this part of submission 10 also may refer to land south of the 'Fisher Block', between the State Highway 8/80 intersection and Lake Pukaki

(see Attachment 2). This land was not included in Sub-Area 6, being of central importance between the highway and lake.

35. My opinion it that developments in this area, referring to potential buildings and their access roads, entrances, servicing etc, would markedly change public experience of the natural character of Pukaki and that this area should remain rural in character. This is discussed further under Issue (iii) below.
36. I would not support extension to the Sub-area 6 'pink area' in the portion of land between the Pukaki shoreline and State Highway 8 margin, nor providing for a development node or building sites in this area.
37. See my recommendation in paragraph 44 below.

Issue (i): Lake Wardell Block

38. I understand the 'Lake Wardell Block' comprises the land east and south of State Highway 8, between it and the Pukaki-Ohau Canal. See map in Appendix 2.
39. Map 8, 'Capacity for new Nodes', in the Landscape Study indicates a potential for a single development node in the moraines east of the Pukaki River, but none west of it. The area west of the river is within the 'Area Where No New Nodes are Suitable (uncoloured)' on Map 8.
40. Map 8 also shows a 'town' east of the Pukaki River outlet, because this is provided for in the District Plan, although not built. See District Planning maps 33 and 50. This is not on Rhoborough Downs land.
41. It is acknowledged that the 'Lake Wardell Block' is heavily modified from having been the central works area in the hydro days. Also that it has a considerable covering of wilding trees. However my opinion is that the central landscape values of this land derive from its being part of an area of undeveloped rural character, not from its modified state, or the ability to mask development visually within wilding trees.
42. This and the land in (ii) above is part of a wider 'focus area' of Lake Pukaki, where State Highway 8 crosses the canal and river outlets, where the main visitor centre is, and where the Mount Cook Highway originates. This area is central to the Lake Pukaki 'experience', and therefore for tourism in the Mackenzie. My opinion is that this area collectively is too crucial for the Council to provide for its development through sporadic applications, property by property.
43. Regarding Submission 10 (i), my conclusion is that the landscape values of the 'Lake Wardell Block' are part of a wider area of strategic importance, despite the seeming modified state, and that a decision on whether or not to allow a node in this area depends on other planning factors as well as solely landscape ones.
44. I consider it would be appropriate given the strategic importance of this area for the Council to develop a 'Structure Plan' for a sustainable and coordinated pattern of development, reserves, rural and conservation uses in the Pukaki outlet area. This should provide for the area 'Pukaki Downs to Hayman Road (east

Pukaki) intersection' generally, but for the area 'State Highway 80 intersection to Pukaki Village Zone' specifically.

Recommendation 10/(i) and (i)

45. *I therefore recommend that the Council not allow a development node in the 'Lake Wardell Block' (i) or the lake outlet end of the 'Lake Block' (ii) of Rhoborough Downs, and not extend the 'pink' Landscape Sub-Area onto these areas.*

11/4 Ruataniwha Farm Ltd (A. Hocken)

46. This part of Submission 11 requests that an Identified Building Node be allocated to Ruataniwha Farm, the placement of which should include existing residential dwellings and sheds along Ostler Road.
47. The area west and south of Twizel was identified in Plan 8 of the Landscape Study as an 'Area for Lifestyle Subdivisions'. It was considered that closeness to Twizel of these locations made them unsuitable for the node development policies proposed for most of the rest of the Basin. This part of Ruataniwha Farm is within the identified 'Area for Lifestyle Subdivisions', so no Identified Building Node was indicated.
48. The landscape values of the property indicate a capacity for development but my understanding is that it will be part of the general consideration for land around Twizel, currently under consideration by the Council.
49. *While accepting the capacity for development, I recommend that submission 11/4 be declined.*

43 S. Preston

50. This submission also concerns Rhoborough Downs and should be read in conjunction with Submission 10 above. It states:
- (1) *We would like all of our property marked with an X replaced with pink so we can continue our plans; All the nodes in our area seem to be on Pukaki Downs Station, so some on our property would seem fair?;*
 [This refers to the 'Area Where No New Nodes are Suitable' (X), on Map 8 of the Landscape Study, and to Landscape Sub-Areas 6 & 7(pink)]
- (2) *The blue area in our swamp does not make much sense as you cannot build in a swamp. The blue area should be extended over a much wider area.*
 [This refers to the blue 'Area for Lifestyle Subdivisions' on Map 8]
51. Regarding 43(1) my opinion is that the landscape values of the middle and south parts of Rhoborough Downs depend on openness and would be diminished by development there, but that development would be appropriate nearer State Highway 80 and in the west. See the discussed under Submission 10 (iii) above. For that reason I would not recommend those parts of Rhoborough Downs marked with an x being converted to pink.
52. Although ultimately a Council issue, I expect that of the '3' and '5' maximum number of new nodes shown for Landscape Sub-Areas 7 & 6 on Map 8, at least 3

would be on Rhoborough Downs. These generally would be in or near the wilding tree areas either side of State Highway 80 but out of sight of the road. I agree with the submitter that the Council needs to take fairness between properties into account when administering this plan change.

53. (2) The 'blue area' in the west of Rhoborough Downs and neighbouring properties was assessed by me as an area where development could occur without significant impacts on the landscape values. I have not been onto the land but only viewed it from the south, and also did not take ownership boundaries into account in identifying the area.
54. The Landscape Study recommended it as an area suitable for rural residential subdivision and building. If this were to occur, it is agreed that any development should be kept back from swampy parts.
55. However the Council has not yet accepted this recommendation from the landscape Study or at this stage assessed the merits of this area for rural residential development. This is likely to be considered as part of its current review of zoning around Twizel.
56. While the landscape values indicate a capacity for development in the area, any decisions clearly are dependant on outcomes of the Twizel review.
57. *Therefore, while noting that development capacity exists in the south west of Roborough Downs, I recommend*
 - (1) *that the 'x' areas of the centre not be converted to 'pink' Landscape Sub-areas;*
 - (2) *that a decision on areas in the south west be deferred until the Twizel considerations are completed; and*
 - (3) *that development be concentrated within Sub-area 7;*

69 Haldon Station

58. Submission 69/1 seeks that the Identified Building Node at Haldon be extend to the Lake Benmore shoreline and to the river south of the homestead block.
59. Currently the node is separated by some considerable distance from Lake Benmore, being focused around the station homestead and buildings, which also are a considerable distance from the lake.
60. In my opinion an enlargement major enough to extend to the lake is not in keeping with the nodal concept of Plan Change 13. Also, I believe any developments should be kept back from the lakeshore and river margins.
61. However I see no landscape reason why the Identified Building Node in the homestead area at Haldon should not be increased to some degree.
62. Submission 69/2 seeks 3 additional nodes on their 35,000 acre property.
63. Provisions for new nodes are based on assessments of landscape capacity, not solely on property size, although it is acknowledged this is an extensive property.

My opinion is that 3 additional nodes requested may well be appropriate. The Landscape Study notes a potential for 5 nodes in the Haldon/Black Forest area (Sub-area 3). However the suitability of any particular place within the Sub-Area will depend on the specifics of its proposed siting.

64. My understanding is that it need not be part of this plan change process to specify nodes within the proposed landscape sub-areas, but that this would occur by planning application at the time each development is proposed.
65. Therefore, while confirming the capacity for potentially 3 new nodes within the Haldon parts of Sub-area 3, I do not think it necessary to agree on these until such time as an application to proceed with any particular node is prepared.
66. *I recommend that:*
 (1) *The Council consider extending the Identified Building Node at Haldon, but not as far as the Lake Benmore shoreline or riverbank; and*
 (2) *That the Council decline to identify 3 specific new nodes at Haldon, but confirm the potential for them within Landscape Sub-area 3 of map 8 in the Landscape Study.*

78 M.&E. Lindsay

67. This submission refers to the pastoral lease Omahau Hill which occupies parts of the southern end of the Ben Ohau landmass, on the eastern (Twizel) side. The submitters note that no Identified Building Node or new node has been recorded for Omahau Hill, and in submission point 3 ask that they have the right to build a planned new farm house.
68. The submitters are correct that no provision has been made for their property so far under Plan Change 13. This is an oversight which should be rectified as it was never intended that a property such as this would not have an existing node.
69. I am not fully certain as to the location of the existing and planned houses on the Ben Ohau Road but that area is mostly within the low or medium 'Vulnerability to Development' category on Map 7 'Capacity to Absorb Development' in the *Landscape Study*, so I would see no landscape issues to not provide for these submitters in some form.
70. This could be achieved either by agreeing an 'Identified Building Area' with the submitters.
71. *I recommend that the Council allow for a building area on Omahau Hill by an Identified Building Area.*

82 Hocken Lane Landowners Association

72. This is the same issue as discussed in Submission 57 Shearer in paragraphs 187 – 193 below. It is agreed this area may be suitable on landscape grounds to be either either a node or part of the Twizel surrounds zoning.

73. However other factors such as access, servicing and natural hazards also would be relevant to the future use of this area, besides landscape factors.
74. *I recommend that the Council note the landscape suitability of this land for development.*

83 Fountainblue Ltd, Southern Serenity Ltd & Pukaki Tourism Holdings Partnership

75. This submission comprises 3 parts and concerns Pukaki Downs
76. **Submission 83 Issue 3** requests that the existing Manuka Terrace Rural Residential Zone near Twizel be renamed and expanded to include Pukaki Downs. Alternately, that a separate Pukaki Downs Rural Residential zone be established with same subdivision rules as Manuka Terrace.
77. A map of the proposed zone shows a sizeable area is envisaged and that it would be in a visible location marked as unsuitable for new nodes on Plan 8 of the Landscape Study. The reason for unsuitability was that this area occupies the open area in the centre of a valley where development would be visually conspicuous, and also would block the sense of natural openness and continuity from the Twizel/Rhoborough Plains to the Black Hills and Ben Ohau Range behind.
78. The Landscape Study does however identify Landscape Sub-area 8 to the north west, indicating a capacity for development towards the sides of this valley, where they would have less impacts on the natural character.
79. A standard rural residential subdivision would not have as much potential to be blended into this very natural area as a node-based development would. A plan of the proposed Rural Residential development shows it to have 49 lots and cover an area of 340ha. This would be considerably more extensive than a node envisaged under Plan Change 13 rules, and larger than existing developments throughout the Mackenzie Basin. My impression is that a development of this size would have major impacts on the natural character of this valley.
80. My impression also is that a rural-residential community in this location would have the appearance of a 'spot' development, unrelated to other developments in the surrounding area.
81. I also am concerned at the impacts of the necessary access roads, power lines, and services associated with this proposal, which have the potential to significantly lessen natural values over a wider area than solely that proposed for the
82. My conclusion is that this development would not be of a size, type or location envisaged under Plan Change 13, and would be likely to have major impacts on the area proposed.
83. **Submission 83 issue (4)** proposes an extensive 'Eco and Wellness Tourism Zone' straddling a considerable length of State Highway 80. Council members

visited these areas with the applicant. They are part of Landscape Sub-Area 6 from the Landscape Study, which confirms a potential for development.

84. The area envisaged is extensive, would have its own separate rules, would straddle a critical part of State Highway 80, and would introduce commercial uses where they currently don't exist. In size and potential impacts it is quite different from the development approach envisaged under Plan Change 13. I would have major concerns at the potential to significantly alter and detract from the natural character surrounding this important piece of tourist highway, and to significantly impact on the highway and tourist experience.
85. A zone such as this is not the form of development proposed under Plan Change 13. In principle, a comprehensive development that embraced the Council's ideas of naturalness, landscape character and highway atmosphere could potentially be acceptable, but there are strong reasons why the Council would need to impose strict conditions on highway, lakefront, landscape and several other effects.
86. *My conclusion is that, while acknowledging the potentials for development in this area, it is impossible to properly consider the landscape effects of a proposal of this magnitude and gravity in the context of Plan Change 13, and that given its potential for major landscape change in an important tourist area and its departure from the principles underlying the Plan Change, the Council should decline this submission.*
87. **Submission 83 issue (5a)** requests that an Identified Building Area be agreed on an area of land outlined, in the existing farm centre/homestead area. The area contains 2 existing houses east of SH80 and the farm buildings and working area west of it.
88. My opinion is that the proposed node is larger than would be desirable in this location for potential landscape impacts, that it should not straddle the State Highway or be visible from it, and that it would be inappropriate to designate a building node as close to Lake Pukaki as proposed in this submission. If this node were adopted, the potential for significant negative landscape impacts would arise.
89. The discussion concerning Submission 24 in paragraph 162 - 167 below supports creation of a node around the Pukaki Downs farm buildings on the west side of SH80, but moved back from the highway.
90. The other part of the Building Area requested, between State Highway 80 and the lake, is part of landscape Sub-area 6 as proposed in the Landscape Study. This indicates that a potential for development exists in this area.
91. I would see no particular landscape issues arising if the Council granted a new node in this area, incorporating the two existing houses and new building platforms, so long as they complied with the criteria set out for nodes in Plan Change 13, but in addition, (i) did not include slopes facing lake Pukaki; (ii) did not include slopes visible from SH80; and (iii) was serviced off the same highway entrance as the existing houses. The reasons for these additional criteria are to

limit potential impacts of any development on existing natural character of the lake and highway.

Continuous Development

92. Further, regarding Submissions 83 (4) and (5a), it is noted that the outlined areas of proposed Eco Zone (84/4) and 'Homestead Node' (84/5) both include the same land in the south of Pukaki Downs (see airphotos 'A' and 'B').
93. The approach of Plan Change 13 is to establish a development pattern of nodes separated by extensive natural space in the Mackenzie, thereby maintaining the sparse character of the basin as far as possible.
94. My opinion is that it would not be in accord with the pattern sought by the Council in Plan Change 13 for the two areas proposed in 'A' and 'B' to be contiguous as proposed. My view is that the Council should ensure separations as set out in Plan Change 13 are maintained between these two potential developments areas/nodes, particularly given the existence of a third house in other ownership, between the two.
95. **Submission 83/5b** requests that 'the Mackenzie Basin Sub-Zone (taken to refer to Sub-Zone 6) be amended to exclude land owned by the submitter. Various lots are listed, a title search of which indicates the submitters envisage virtually the whole of their property, except for the high mountains, be excluded from the nodal policy. This is consistent with the foregoing requests for specific zones covering various parts of their land.
96. Plan Change 13 seeks to maintain the distinctive landscape character of the Mackenzie Basin by implementing a nodal planning and development regime which would allow significant areas of the basin to remain in their underdeveloped, highly natural state. The alternative Rural zoning would see the Basin gradually taken up by more continuous rural subdivision and development, which would effect greater changes on the existing landscape values.
97. My opinion is that the landscape values of this prominent and extensive area would be made more vulnerable to inappropriate change if the Council excluded it from its intended policies.
98. *I recommend that the Council decline this submission point.*

125 K. Simpson

99. Submission 125 concerns Balmoral & Mount John stations. In the part of the submission considered here Mrs Simpson requests that an Identified Building Node be provided for Mt John station.
100. In preparing the Landscape Study I was under the impression that Balmoral and Mount John operated as an amalgamated unit. I therefore provided for only one existing node. However if this is not so, I would see no landscape reason for not providing for a separate Mount John node.

101. The old homestead having recently been incorporated into the expanding Tekapo town area, a new working site may well be justified, outside the town. Map 5 of the Landscape Study includes most of Mount John in the 'High Visual Vulnerability' category, so care will be needed in its siting.
102. On landscape grounds, therefore, there is believed to be capacity for the node requested on Mt John and I could support this submission, although noting that no site has been proposed so far. There also may be a case for a renewed farm working area to replace that compromised by expansion of the Tekapo town area.
103. However it is drawn to Council attention that they may need to consider the matter of Building Nodes on amalgamated properties generally, and from more than just a landscape perspective.

Recommendation, Submission 125

104. *I recommend the Council note that landscape capacity probably exists for an Identified Node in some area on Mount John Station, but this is provisional given that no site has been proposed. Also that the Council needs to consider its position generally regarding building nodes on amalgamated properties.*

B: APPENDIX R – CAPACITY FOR NEW NODES

105. This section considers the following submissions:
- 10 Rhoborough Downs Ltd
 - 13 Robert Preston
 - 42 Roberta Preston
 - 43 S, Preston
 - 60 Lone Star Farms Ltd
 - 61 Star Holdings Ltd
 - 62 S. Cant Branch, Royal Forest & Bird Society
 - 64 Glenrock Station Ltd
 - 71 Meridian Energy Ltd
 - 74 Canterbury Regional Council
 - 122 S.&P. Cameron

10 Rhoborough Downs Ltd

106. This submission concerning the capacity for new nodes is addressed in paragraphs 14 – 45 above and 110 – 120 below.

13 Robert Preston

107. Mainly, this submission is addressed in 14 – 29 above.
108. This submission states *'We would like the maximum number of new nodes per property deleted and at the very least to be more flexible on a per property basis'*

109. The intention of stating a maximum number of new nodes per landscape sub-area is to avoid the sparsely-settled open character of the area becoming so settled by residential units as to change the existing character.

42 Roberta Preston

110. This submission gives a clear statement of the pressures on Rhoborough Downs and the wish to capitalize the property with development. Although not stated, 'development' is taken to mean the subdivision of land and its sale for residential development
111. This submission should be read in conjunction with 30 – 45 and 50-57 above.
112. It is accepted that capacity exists for residential development at Rhoborough Downs. The 'x' areas are an attempt to signal to owners that greater landscape change will occur from development in these areas than in those marked 'Landscape Sub-Area'.
113. The proposals in Plan Change 13 confirm that the least landscape impacts on Rhoborough Downs will occur from development in the east of the property, where trees exist, and in the west, where they can be sited beneath the Ben Ohau slopes.
114. The specifying of pink 'Landscape Sub-Areas' and blue 'Lifestyle' areas in Map 8 of the Landscape Study suggest general areas towards this approach, with it being left to each owner to select sites suited to aspect, topography, drainage and so on.
115. However the Mackenzie Basin including Rhoborough Downs has been assessed as an Outstanding Landscape and the 'x' plus 'Landscape Sub-Area' approach delineates where development has been assessed to create more and less landscape change.
116. Such an approach will require restraint in 'x' areas, but was hoped would also leave each property with sufficient development opportunities for their purposes.
117. Such an approach also assumes a property is to remain a farming enterprise, with residential areas cut out, as opposed to being wholly given over to becoming residential areas.
118. It is acknowledged that the disposition of 'x' and 'pink' areas was prescribed by me on landscape impact grounds and with insufficient opportunity for landowner consultations in most cases. This was due to time constraints in preparing Plan Change 13 rather than an intended lack of respect for owners.
- 119. *I recommend that prior to the hearing a site visit be sought with the Rhoborough group of submitters, with a view to identifying, if possible, mutually acceptable development boundaries on the property west of State highway 80. By 'group of submitters' is meant 10 Rhoborough Downs Ltd, 11 Robert Preston, 42 Roberta Preston, and 43 Sarah Preston.***

43 S. Preston

120. This submission is covered in paragraphs 14 – 45 above

60 Lone Star Farms Ltd

121. This submission **60/2** concerns Godley Peaks Station. The part considered in this section seeks *'should .. an analysis deem a set number of nodes to be an appropriate land management method, then map 8 be amended to show the maximum number of new nodes per station rather than per landscape sub-area'*.
122. I support this submission as it would give a clearer definition of options for each property.
- 123. I recommend that this part of Submission 60 be accepted.*

61 Star Holdings Ltd

124. This submission **61/2** also concerns Godley Peaks Station and appears to be identical to Submission 60 other than the interested party. My recommendation is the same as stated in paragraph 120.

62 S. Canterbury Branch, Royal Forest & Bird Protection Society

125. Submissions 62/15 expresses concerns about the wider distribution of nodes in Appendix R 'Capacity for Nodes' than in the earlier Proposal document. Cross-referenced to 62/12, this is taken to reflect concerns over wider capacity for impacts on lake margins, resulting from the wider distribution of nodes.
126. Firstly, despite wider distribution, the number of potential developments is not increased, and therefore neither is the potential for intensity of shoreline impacts.
127. Secondly, the need to maintain naturalness of shorelines is acknowledged. We have attempted to define Landscape sub-areas which end well short of shorelines, or are separated from them by roads. Also, through the rules, we have attempted to ensure developments in a node are kept back from a lakeshore or river bank

64 Glenrock Station Ltd

128. This submission concerns Holbrook Station near State Highway 8, between Burkes Pass and Tekapo. It is the area photographed on the cover of the Landscape Study. Holbrook formerly was a separate operation but is understood to now function with Glenrock as an amalgamated operation.
129. **Submission 64/8** requests that an 'Identified Building Node' be agreed for the existing development around Holbrook homestead. This is an established area with all the attributes of a node as identified in the Landscape Study. The reason for not identifying one here was that it was part of an amalgamated unit, and believed to be not the main homestead of the combined operation.

130. On the grounds of landscape character there would be acceptable to grant this request. The area is shelter planted and 'domesticated' and thus could accommodate further development without major change.
131. However the location on State Highway 8 at the point of tourist's first seeing the Basin, is a sensitive one, particularly as regards possibilities for commercial usage in any node. The Council should ensure that fragmenting of development, particularly commercial accommodation, away from Tekapo would not result if this node were allowed. My opinion is that this would diminish the existing character of the area.
132. Additionally, the node as proposed in this submission has a long frontage onto the State Highway. While a shelterbelt of trees exists on this frontage, my opinion is that the main parts of any node should be set back from the Highway, and the node should avoid creating a linear effect on the highway.
133. The issues in this case are more than solely landscape ones. My opinion is that physically the grounds for exist a node but that the view from State Highway 8 is particularly sensitive in this area. Inappropriate development, for instance commercial operations, would have effects on the landscape character contrary to the intentions of Plan Change 13.
134. On landscape grounds I conclude that an 'Identified Building Node would not be contrary to the landscape values of this area so long as sub-area will need to also take other non-landscape issues into consideration.
135. **Submission 64/9** additionally requests that a new Landscape sub-area be established south of State Highway 8, to include the existing Holbrook homestead node and also the capacity for a new node. A map attached shows this sub-area extending down State Highway 8 from the homestead to the area adjacent to Sterickers Hill.
136. This is an important area for highway views being the SH8 entrance to the Mackenzie and a prime area where tourists begin to experience the Mackenzie landscape. District Planning Map 30 shows a Scenic Viewing Area in part of this proposed sub-area.
137. In my opinion this area is not suitable for additional nodes as they would alter the natural character and high degree of naturalness in this stretch of highway. I believe the Council should maintain the State Highway environs in as natural and unbuilt a state as possible outside the area already occupied by the homestead.
138. *For these reasons I recommend that the Council decline the part of this request contained in submission 64/9.*

71 Meridian Energy Ltd

139. **Submission Point 71/25** proposes amended wording for Policy 3K, to acknowledge that Lake Benmore is an artificial lake and the Mackenzie basin generally has a history of modification related to hydro development. Proposed altered wording is included.

140. It is fully correct that the Basin is so modified and my general conclusion is that modifications along the lines proposed should be added to Policy 3K.
141. However submission point 71/25 also proposes alterations to a sentence regarding Lake Alexandrina, including removal of reference to its outstanding value. I have no objection to the alteration generally, but would wish the words 'and of outstanding value' to remain at the end of that sentence.
142. 71/20 notes inconsistencies in terminology and map notation between the Landscape Report and various appendices. It also proposes various amendments to the 'Capacity for New Nodes' plan and policies, to ensure developments arising from the 'node' approach do not interfere with Meridian's need to manage power generation, lakes and margins, including erosion and spillway discharges, canals and transmission lines (Transpower).

Capacity for New Nodes

143. This submission point notes several areas where parts of Landscape Sub-areas in Appendix R (Capacity for New Nodes) fall within or in close proximity to Meridian's operating areas. It actually refers to 'nodes' falling within Meridian areas, but as no nodes are allocated other than existing ones, this point is considered on the basis that parts of some Landscape Sub-areas fall within their operational areas, raising a potential for new nodes to be located within Meridian's operational areas.
144. Meridian's safety margins were not specifically taken into account in drawing up the Landscape Sub-Areas due largely to Meridian not supplying information on the areas and facilities of concern. This matter was I understand raised in consultation but not followed up by Meridian.
145. However the submitter's concerns are accepted. It was anticipated that this concern would be provided for in deciding the location of any particular node within the sub-area in the future. Therefore it is considered that these matters are best dealt with on a case by case basis when an application for a new node is made. Protections of Meridian's operations are provided for in Policy 3G which specifically refers to the potential creation of reverse sensitivity effects on activities such as power generation.
146. My conclusion therefore is that amendment of the four noted Sub-Areas is probably not necessary, but that deletion of Sub-Areas 4, 13, 14 and 21 in their entirety, as suggested by this submission, is not supported as it would remove the ability of landowners in these areas to establish any new development nodes.
147. Submission Point 71/21 Refer to above discussion.
148. Submission Point 71/13 Refer to above discussion

74 Canterbury Regional Council

149. Submission point 74/2 states that *'the analysis used to establish these 'Landscape Sub-Areas' is considered to be deficient and not sufficiently robust to meet section 32 (RMA) requirements'*.
150. The analysis in the Landscape Study adopts the Pigeon Bay criteria and applies it at a scale considered appropriate for this large-scale landscape. It also refers to and builds on previous studies of the Basin.
151. The discretionary regime created under Plan Change 13 enables landowners to apply and have their proposed node considered on the basis of large number of criteria, many of which seek to avoid inappropriate development within an outstanding landscape.
152. While detailed descriptions of the landscape analysis are not written into the landscape report that does not necessarily indicate that the assessment is flawed or the conclusions invalid. The Council has considered the report and its findings and taken from it those matters it considered "ring true" and which are seen to be in keeping with other accepted analysis.
153. I consider therefore that this challenge does not raise sufficient matters to justify removal of the landscape sub areas. I also consider that any concerns about where lines are drawn are most appropriately and usefully dealt with through specific submissions.

122 S.&P. Cameron

154. **Submission Points 122/1 & 2** seek either that Plan Change 13 be withdrawn or that the nodal development system be withdrawn or changed as it is too prescriptive and heavy restrictions need not apply out of sight of State Highways 8 and 80.
155. The prescriptive elements of Plan Change 13 are based on the identified values of the Mackenzie Basin, arising from the Landscape Study. These include but are not limited to the visual values relating to State Highways 8 and 80.
156. The Council is required by the Resource Management Act to ensure these values against inappropriate development and has accepted the nodal development system as a model for doing this while attempting to provide development opportunities for those landowners seeking them.
157. The Landscape Study recommended that the nodal system not apply to an area around Twizel, including parts of these submitters' land. However the Council has not to date accepted this, pending a consideration of development around Twizel generally.
158. My opinion is that there is justification for the restrictions proposed, that they need to apply to the basin generally, not just areas visible from the state highways, and that they have the positive intention of seeking to maintain the existing character and values of the basin.

159. *For these reasons I recommend that submission points 122/1 and 2 be declined.*
160. **Submission points 122/6, 122/7 and 122/11** ask that 'Capacity for New Nodes' and 'Identified Building Nodes' be revisited in consultation with landowners on an individual basis.
161. Decisions on whether further nodes should be included in the District Plan in response to submissions to this Plan Change will be made the Hearings Panel. If they consider new nodes are required then I would support a visit to the individual properties being arranged and the owners' requirements being provided for in terms of nodes.
162. The Council has been involved in ongoing investigation and consultation regarding providing for the growth of Twizel, which I believe includes consideration of extending residential zones and providing for lower density living zones on the outskirts of Twizel. I would expect that some of the land owned by the submitters would be considered as part of this exercise.
163. I would support these submission points 122/6, 7 & 11, and believe this process will occur where necessary through the hearings process.

C: APPENDIX S - IDENTIFIED BUILDING NODES

164. This section considers the following submissions
- | | |
|----|----------------------------|
| 24 | Mackenzie District Council |
| 32 | Irishman Creek Station Ltd |
| 44 | Mrs M. Seymour |
| 54 | Guide Hill Station |
| 57 | Alister Shearer |

24 Mackenzie District Council

165. This submission seeks to remedy omissions to the notified Plan Change by adding two 'Identified Nodes' that were omitted at Pukaki Downs and Ferintosh #2. The former is in Landscape Sub-Area 6 and the latter in Sub-Area 9.
166. I have not previously seen the Ferintosh request but confirm I did advise the Council regarding Pukaki Downs, in the letter of 31 March 2008, as quoted.
167. From a landscape perspective there is capacity to absorb both nodes, as indicated on Map 8 of the Landscape Study. I therefore would support these additions in general.
168. However from the map for Pukaki Downs, which I have not previously seen, my opinion is that the proposed area is not set back from State Highway 80 sufficiently to avoid potential inappropriate landscape impacts. My opinion is that the area of proposed node between the northernmost shed and the highway should be deleted (upper right on plan) and an equivalent area substituted in the

west (left hand side on plan). With this amendment I would support the Pukaki Downs request.

169. Although I have not revisited the site, my recollection is that the Ferintosh addition would be substantially screened from the road, as stated. I therefore would support this addition.
- 170. *I recommend that the two identified nodes proposed at Pukaki Downs and Ferintosh #2 be adopted, but that the Pukaki Downs node be set back from State Highway 80 further than proposed, as show in a plan in Attachment 3.***

32 Irishman Creek Station Ltd

171. The part of submission 32 considered here states that '*the proposed node for Irishman Creek omits a substantial area where there are numerous farm buildings*' and submits an amended map including an additional area '*that conforms to the criteria listed in the Plan*'.
172. I see no landscape reasons as to why a larger node should not be accepted. Parts of the 'amended area' proposed are within the existing shelter-planted area of Irishman Creek and all of it is within the area of improved pastures. It was the shelter-planted areas in particular that I originally envisaged as a 'periodic homestead node' typical of the Mackenzie Basin landscape (*Landscape Study 3.18 (x)*).
173. My opinion is that it would not devalue the landscape character proposed under Plan Change 13 if this property's development entitlements were distributed throughout the wider shelter-planted area of the Irishman Creek homestead.
174. I would however be concerned about the northernmost part of the amended area proposed. This is sheltered from the west (Left hand side on map) but not from the east. Development here therefore would be visible from State Highway 8, although at some distance and with partial screening by willows except in winter.
175. My opinion is that any extension could include the main enclosed paddock area requested but should not include the northern paddock, which is the area in white, off the plan, in 'Amended Node'.
- 176. *I recommend that the Council partially accept the amended area proposed in Submission 32, but not accept the northernmost part.***

44 M.E. Seymour

177. This submission concerning Ferintosh Station seeks:
- (i) That an area of the lower homestead area is excluded from the Identified Node and should be reinstated;
 - (ii) That an area north of the homestead shown within the Identified Node is on a neighbour's land and should be deleted;
 - (iii) That an area zoned Tourist G on Glentanner land south of the Twin River bridge is unsuitable for tourist development, will have the opposite effect to

- what is sought in Plan Change 13, and should be withdrawn or deferred for 10 years;
- (iv) That the Tourist G zoning for Glentanner Park generally be lifted and some limits on its capacity be defined.
178. (i) I am unsure of the area and issue in this case.
179. (ii) The node outline north of the homestead block was drawn without knowledge of an ownership boundary. If a neighbour's land has been inadvertently included, I agree the node boundary should be redrawn to follow the Ferintosh boundary along the northern end.
180. (iii) Seeks an area of Tourist G zoning on Glentanner land south of the Twin River bridge be deleted or deferred; and (iv) that the Tourist G zoning on Glentanner land north of the Twin River bridge be deleted or its extent limited.
181. This issue refers to zoning that existed in the Mackenzie District Plan before notification of Plan Change 13. It therefore is beyond the scope of this assessment, other than as to the capacity to absorb development stated in the Landscape Study.
182. My opinion is that further tourist development north of the Twin River bridge, in or as an extension to the Glentanner Park facilities, would not be detrimental to existing landscape values. It is noted that the Tourist G zone north of the bridge, shown on Map 17A of the Mackenzie District Plan, does have prescribed boundaries, which define the limits to its capacity. Also that the Tourist G zone is separated from State Highway 80 by an open space area, which I believe is desirable for maintaining the natural character of this area.
183. A purpose of the Glentanner facilities is to partly relieve tourist pressures on Mount Cook National Park, which assists the maintaining very high environmental standards within the Park. My opinion is that Glentanner Park can fulfill this function without significant further loss of landscape character in the Glentanner – Ferintosh area, although the submitter's comments about aircraft noise are acknowledged as an issue.
184. For these reasons I believe the area north of Twin River is an appropriate tourist area and that there should be no need to withdraw this special zoning, were it possible under Plan Change 13.
185. Regarding the undeveloped Tourist G area south of Twin River bridge (on the Ferintosh side of the river), my opinion is that development of this area is likely to have major and negative impacts on existing natural character, particularly as to the area between State Highway 80 and the lake.
186. Although I am not sure that action can be taken under Plan Change 13, my opinion is that developing the Glentanner node solely north of the river would have the least negative effects on existing natural character and landscape values.

54 Guide Hill Station (96 D.R. & M.P. Gould)

187. Most of these submissions are dealt with in the planner's report and this landscape report considers solely the request to amend the Identified Building Node to incorporate the homestead.
188. It is accepted that the Identified Building Node does not incorporate the new homestead built in 2004. Clearly it should and I would see no landscape reasons for the Council not to do so, also referring to two other smaller amendments requested.
189. *My recommendation is that the Identified Building Node boundary at Guide Hill should be amended as shown in the submitters' 'Amended Node' plan.*

57 A. Shearer

190. This submission concerns the Ruataniwha homestead area north of Glen Lyon Road at Twizel. Mr Shearer requests;
- (i) that Map 5 of the Landscape Study be amended to exclude the Ruataniwha homestead area from the zone of High Visual Vulnerability, it being an area of developed pastures and large numbers of mature trees; and
 - (ii) that either the Lifestyle Subdivision Zone be amended to include the Ruataniwha homestead area, or a Ruataniwha Homestead Node needs to be identified under Plan Change 13.
191. Both elements of this submission are accepted. The status and boundaries of the Ruataniwha homestead area did not come to my attention in preparing the Landscape Study or Plan Change 13 but now should be resolved under this submission.
192. I agree that the area of High Visual Vulnerability approximates the open tussock area north of Ruataniwha, and that the area of mature trees around Ruataniwha homestead has greater capacity to absorb changes than the open areas to the north. However my view is that the lessening of vulnerability around the homestead is due primarily to tree growth rather than the presence of improved pastures and subdivision into paddocks, although these latter are contributory factors.
193. I am not sure that it is within the authority of Plan Change 13 to alter Map 5 of the Landscape Study. However as the author I acknowledge that the subject boundary was not fully resolved in that study and that a more appropriate boundary between the High and Low Visual Vulnerability areas would be to include the Ruataniwha homestead and surrounds in the Low Vulnerability area.
194. I am aware that the Council has been involved in ongoing investigation and consultation regarding providing for the growth of Twizel and that this includes consideration of extending residential zones and providing for lower density living zones on the outskirts of Twizel. I also understand that the area of the Ruataniwha homestead is being considered as part of this exercise.

195. Choosing between the consequential changes to either the Lifestyle Subdivision Zone or a Homestead Node is a matter that can be determined through the Councils review process for Twizel mentioned above. However I confirm my opinion that the potential impacts of either alternative on landscape values would be minor.
196. *I recommend that the Council note my views on amending Map 5 of the Landscape Study and undertake either to include Ruataniwha homestead in the Lifestyle Subdivision Zone or to create a Ruataniwha Homestead Node.*

D. RECOGNITION OF MACKENZIE BASIN

This section considers the following submissions:

V2-71/7, & /17 Meridian Energy

V2-91/3 Transpower

V2-74/13 Canterbury Regional Council

71/7 Meridian Energy

197. This submission seeks amendment to Policy 3A to ensure component outstanding natural landscapes of the Mackenzie Basin are recognized, but that the whole Basin is not taken to be an outstanding landscape. It suggests amended wording to that effect.
198. The submission states (para 48) regarding policy 3A that *'the Policy may be read as inferring that the entire Mackenzie Basin is an outstanding natural landscape, when that is not the case.'* This is directly contradictory to the findings of the Landscape Study, that concluded the whole basin is an outstanding landscape.
199. Early on the intention was that the basin be termed an 'outstanding working landscape', to take account of the natural values but also the modified, working, managed nature of most of the Basin due to farming and hydro works. However several independent lines of advice indicated this concept was not tenable under the RMA, which only provides for an outstanding landscape to be an 'outstanding natural landscape'.
200. Therefore the term 'Outstanding Natural Landscape' was adopted to ensure the outstanding values of the basin were adequately provided for.
201. My opinion remains that at a district level all parts of the Mackenzie Basin except the Twizel surrounds comprise landscape of outstanding values. It is agreed that the Basin comprises a series of areas and sub-areas which at various scales also can be considered 'landscapes' in their own right.
202. With the exception regarding Twizel above, I disagree with the premise that *'it is not the case that the entire basin is an outstanding landscape'*. However given the submitter's proposed amended wording does not appear to prejudice this debate either way, whereas the original wording does, I would support the proposed

amendment if it may strengthen the Plan's provisions for the landscape values of any place within the Basin.

203. *I recommend that the amended wording for Policy 3A proposed in Submission 71/7 be accepted.*

71/17 Meridian Energy

204. This submission seeks to amend the wording of Policy 3F Carrying Capacity so it would refer to 'subdivision and residential buildings', rather than as advertised, to 'built development'.

205. Meridian's concerns are that the term 'built development' may compromise hydro electric generation and transmission features and introduce the possibilities for reverse sensitivity issues on their infrastructure.

206. My view is that such structures do give rise to environmental effects and that as far as practicable these should be fitted within the capacity of their receiving environment to absorb them. I would be concerned that narrowing the general term 'built development' down to the term 'further subdivision and residential building' would exempt a large proportion of conceivable changes from Policy 3F and thereby weaken the policy intent.

207. *For this reason I recommend the proposed amendment to Policy 3F be rejected.*

91/3 Transpower

208. This submission seeks to amend Policy 3A to recognize that the landscape values of the Mackenzie Basin result from physical factors as well as cultural and natural ones.

209. I believe this is an issue of definition rather than of the intent of Policy 3A. By my definition built structures are part of the 'cultural factors' referred to in this policy, albeit physical ones as opposed to intangible ones such as concepts or beliefs. My belief is that built structures are included in the phrase 'cultural factors' used in Policy 3A.

210. However if it may clarify matters to state '*cultural factors such as land use, social pattern, identity, and built structures, as well as from natural factors ...*', then I would support that addition.

211. *I recommend that Submission Point 91/3 be accepted in part, but with the further-amended wording suggested in paragraph 201.*

74/13 Canterbury Regional Council

212. This submission seeks deletion of Policy 3F, Landscape Carrying Capacity on the grounds that in the submitters' view the Landscape Study analysis is deficient.

213. Appendix R 'Capacity for New Nodes' has been developed in recognition of the varying capacity of different areas to absorb development. The number of nodes listed for each sub-area is a summary of the cumulative impacts able to be absorbed by that area while maintaining the outstanding landscape values. Within this framework the proposed rules provide the mechanism for full assessment of impacts of any individual node proposal that may arise.
214. In my opinion this is not confusing or inconsistent but a logical and practical application of the Landscape Area assessment and the Low, Medium and High Vulnerability factors noted.
215. The alternatives of abandoning the proposed policy and continuing with the existing Rural zone would be likely to result in greater loss of landscape values than continuing with the policy.
- 216. *I recommend that Policy 3F not be deleted and this submission be rejected.***

E. RELECTIVITY

106/3 Dean Smith

62/28 Forest & Bird

217. These two submissions concern Rule 3.1.2c Reflectivity.
218. **Mr Smith** requests that the maximum reflectivity index for building exteriors be reduced from the stated 40% to 20%. He states the value of 40% currently set by the rules is too high for areas of outstanding natural landscape.
219. In support the submitter quotes a Queenstown Lakes District Council guideline that states 'colours with a reflectance value of less than 20% are usually appropriate in natural surroundings, those of 20 – 35% are often appropriate, and those over 35% are not appropriate in natural surroundings.
220. This appears to be a QLDC advisory pamphlet and not a Plan rule, so has not been through the process of public challenge. The value of 20% is lower than I have previously encountered in a Plan, 30, 35 or 40% being the values usually adopted. However the Mackenzie Basin is a more strongly-natural environment than most rural areas and it would seem logical that more conservative standards on reflectivity may well be warranted.
221. My conclusion is that 40% reflectance is a standard used for average rural areas in Canterbury, so that a lower figure may well be warranted in the specialised environment of the Basin.
222. **Forest and Bird** accept the 40% value but seek limits on the time the roofs of new buildings may remain unpainted and expresses a preference for pre-painted roofs. It does not state what time limit is sought.
223. I have no information as to whether a problem has been experienced in the Mackenzie Basin from unpainted roofs persisting for too long a duration. While theoretically an improvement may result from such a rule, my inclination would be to not impose one unless a problem is known to exist.

224. My conclusion on these two issues is that the natural conditions of the Mackenzie Basin may warrant less reflectance than the average for rural areas and that the 40% figure stated, which is only average for Canterbury. It may therefore be desirable to lessen the required maximum value, but I cannot say that a figure as low as 20% is necessary.
225. *I therefore recommend that the reflectance value stated in 3.1.2c be lowered to 30%, but if specific evidence exists to support a 20% value, then that should be adopted.*
226. *Additionally, I recommend that the Council not adopt additional rules about duration of unpainted roofs unless an existing problem is agreed to exist.*

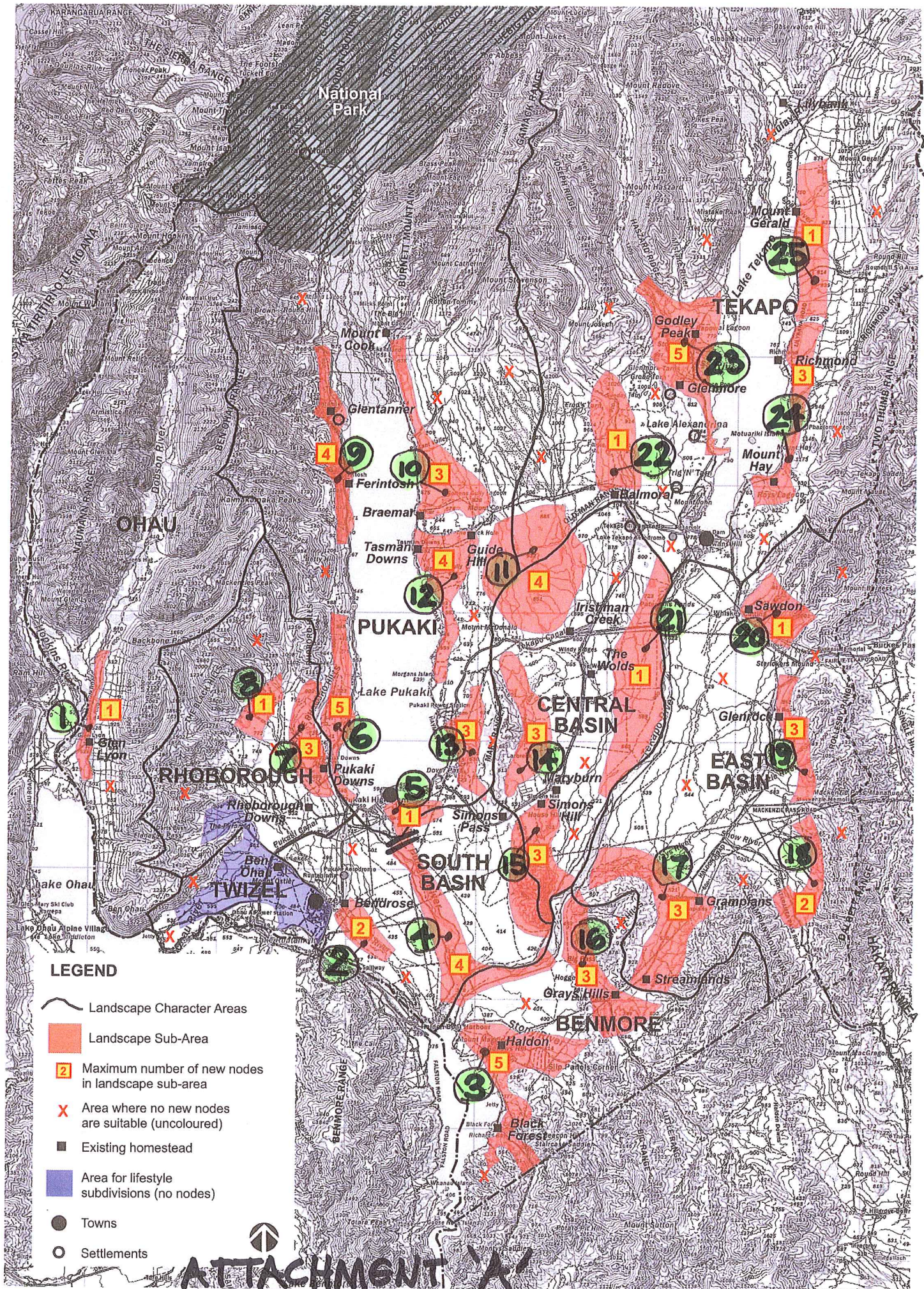
227. This concludes the landscape report.

Graham Densem
ANZILA
Landscape Architect

August 2008

ATTACHMENTS

- 1. Landscape Sub-Area Numbers**
- 2. Airphoto, Lake Pukaki outlet area**
- 3. Identified Node, Pukaki Downs**



LEGEND

- Landscape Character Areas
- Landscape Sub-Area
- Maximum number of new nodes in landscape sub-area
- Area where no new nodes are suitable (uncoloured)
- Existing homestead
- Area for lifestyle subdivisions (no nodes)
- Towns
- Settlements

ATTACHMENT A
LANDSCAPE SUB-AREA
NUMBERING

ATTACHMENT 'B'
LAKE PUKAKI
OUTLET AREA

Pukaki
Downs

Lake
Block

Fisher

Lake
Wardell
Block

T'ship
zone

SH 9

SH 8

SH 8

Rhobarough
Downs

Lake Pukaki, Canterbury, New Zealand

©2007 Google™

Eye alt: 6.71 km

Image © 2008 DigitalGlobe

Streaming: 100%

Pointer: 44°10'59.46" S 170°07'34.39" E



ATTACHMENT 'C'
IDENTIFIED NODE,
PUKAKI DOWNS
(PREFERRED LAYOUT)



PUKAKI DOWNS