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**STATEMENT OF PAUL ANDREW SMITH
MACKENZIE PROPERTIES LTD – PC23.33**

- 1 Since preparing my Rebuttal Evidence, dated 15 May 2024, I have read and reviewed Ms Yvonne Pflüger's Response to Rebuttal on PC23 dated 23 May 2024 and the Legal Submission prepared by Mr Michael Garbett, dated 17 May 2024, prepared on behalf of Mackenzie District Council.
- 2 As outlined by Mr Garbett, Ms Pflüger and I reach different conclusions regarding landscape and visual effects resulting from the proposed RLZ. However, firstly we do agree that the visual effects resulting from future development within Areas A, B¹ and D will be of a low degree.
- 3 Regarding Area C, I continue to consider that development on the southern terrace will be seen as a continuation of rural lifestyle development within Twizel as road users' travel along Max Smith Drive and along Pukaki Canal Road, where rural living development along Max Smith Drive, Pyramid Terrace and Manuka Terrace are seen. Therefore, this small node of development will cohesively form part of the overall pattern of development within Twizel.
- 4 Ms Pflüger and I continue to disagree on the degree of adverse landscape effects. After reviewing Ms Pflüger's Response I continue to consider that she has focused solely on the adverse landscape effects on the site. This is again evident in her Response as she separates out her conclusions of adverse landscape effects in relation to Areas A and D being of a low degree, and subsequently Areas B and C being of a moderate degree. I note that there is no overall conclusion of adverse effects resulting from the RLZ on the landscape values of the receiving environment, as defined and described in my Brief of Evidence.
- 5 A large part of Ms Pflüger's justification for the low degree of adverse landscape and visual effects for Areas A and D is the adjacent zoning and being contained by landform. This justification highlights the lack of weight placed on the existing level of development along Pyramid Terrace, consisting of 4-20ha properties that are adjacent

¹ Page 6, 2nd to last paragraph.

to the site, that are more aligned with the Rural Lifestyle Zone than the General Rural Zone, and are not separated from the site by any physical landform features.

- 6 As discussed in my Brief of Evidence and Rebuttal Evidence, the site forms the southwest corner of the 1,790ha outwash plain that is and is anticipated to be substantially modified by residential and rural living development, that is and will be adjacent to the site's northern and eastern boundaries. The site and the terrace are well contained to the west and south by the Pukaki Canal and Max Smith Drive and Lake Ruataniwha that are clear and defensible boundaries to Twizel. Therefore, future development within the site will cohesively form part of Twizel.
- 7 Due to the above, I continue to consider that the adverse effects on the landscape character and values of the receiving environment will be of a **low** degree. When considering the wider Mackenzie Basin, these adverse effects will be **very low to nil**. Notably, this negligible degree of adverse effects illustrates that the proposal respects the landscape values of the surrounding natural and physical environment.
- 8 Concern has been raised with regard to the little weight I placed on the policy provisions of the General Rural Zone and what they seek to achieve.
- 9 As outlined in my Brief of Evidence, my assessment of landscape effects took into consideration the higher-order Strategic Direction policy provisions including A Thriving Community, Natural Environment, and Urban Form and Development. In doing so, my assessment took into consideration the overarching strategic directions for the District Plan and what they seek to achieve. My Brief of Evidence concluded that the future development enabled by the proposed RLZ will be outside the ONL (NE-01.3.), will be well integrated with the pattern of urban development Twizel (UFD-01.1.), respects the landscape values of the surrounding natural and physical environment (UFD-01.1.) and will cohesively form part of Twizel and the pattern of development that extends west of the township (UFD-04).
- 10 I agree that the site's size and existing level of development currently aligns with the General Rural Zone's minimum lot size, and individually provides a level of open space that the General Rural Zone seeks to maintain. However, as assessed in my Brief of Evidence the site forms part of the most modified part of the Mackenzie Basin. Also, it is an isolated parcel of land from all other rural zoned land that is of a similar or larger size that collectively contribute open space values, being a key landscape value

that contributes to the Mackenzie Basin being an ONL. Therefore, the site and its current open space values do not meaningfully contribute to the open space values of the basin that seek to be maintained or protected. And as I have assessed it, the reduction in open space values will be of a low degree.

- 11 Due to this, I consider that the Rural Lifestyle Zone will provide for living opportunities within a rural environment, within the most modified part of the Mackenzie Basin, whilst maintaining the character and amenity values of the wider rural landscape.

A handwritten signature in black ink, appearing to read "Paul Smith".

Paul Smith

28 May 2024