

Under The Resource Management Act 1991 (RMA)

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

In relation to The submission of Tekapo Springs Ltd

STATEMENT OF EVIDENCE OF MARK WILLIAM GEDDES

9 May 2025



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INTRODUCTION

1. My name is Mark William Geddes, and I am a director, commissioner and planning consultant at Perspective Consulting Ltd.
2. My qualifications include a Bachelor of Resource Studies from Lincoln University, New Zealand, and a Master of Science (Spatial Planning) from Dublin Institute of Technology, Ireland (first class honours).
3. I have worked for 25 years in planning, in New Zealand, Ireland and Australia in both the private and public sectors. I have significant experience in consenting, plan making, enforcement and policy analysis. This experience includes leading major plan making and policy projects; providing expert planning evidence in the Environment Court and Council hearings; consenting a range of developments; and making submissions on national legislation, and national and regional policy.
4. I am a full member of the New Zealand Planning Institute.
5. Tekapo Springs Ltd has commissioned this evidence in relation to their submission on Plan Change (PC29) to the Mackenzie District Plan (MDP).
6. I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2014, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are 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.

EXECUTIVE SUMMARY

7. This evidence is filed in relation to a submission by Tekapo Springs Ltd on PC29.
8. The submission from Tekapo Springs sought changes to PC29 to enable the ongoing operation, expansion and development of commercial and tourism-related development activities on their site at Lakeside Drive, Lake Tekapo. The primary relief sought in their submission was to expand the Sports and Active Recreation Zone (SARZ) into land to the east and west of the site, provide a specific control area over this land specific to Tekapo

Springs and amend the provisions of the SARZ to ensure it enables the operation, development and expansion of commercial and tourism-related activities in this area.

9. The officer's report supports the expansion of the SARZ to the west, the specific control area for Tekapo Springs and several but not all of the other amendments to the provisions of the SARZ proposed in the submission. The further submission by Tekapo Landco and Gotwit Leisure Limited also supports the expansion of the SARZ to the west and east, the specific control area for Tekapo Springs and some but not all of the other proposed amendments to the provisions of the SARZ proposed in the submission.
10. The remaining matters in contention are some of the provisions of the SARZ, the rezoning of the land to the east of the site SARZ and the building coverage of the areas to the west of the site.
11. This evidence, along with the evidence of Ms Crawford, establishes that:
 - a. Some further amendments to the provisions of the SARZ are appropriate
 - b. It is appropriate for the land to the west and east of the site to be rezoned SARZ
 - c. It is appropriate for the building coverage for the Tekapo Springs Specific Control Area to be 40%
 - d. Staff accommodation should be enabled on the site.
12. My recommended amendments to PC29 are attached as **Appendix 1**.

SCOPE AND PURPOSE

13. The purpose of this evidence is to provide an evidential basis for the submission.
14. The scope of this evidence includes:
 - a. Information about the submitter
 - b. A summary of the submission and relief sought
 - c. A summary of the Council officer's report
 - d. A summary of a relevant further submission
 - e. Comment on the remaining matters in contention

- f. Comment on the alignment of the recommended amendments with higher order objectives
- g. A brief Section 32AA analysis for the recommended changes
- h. A brief analysis of the adverse effects of the recommended changes under Section 76 RMA.
- i. The recommended amendments to PC29 to address the submission.

ABOUT THE SUBMITTER

15. The Submitter owns and operates the land and business known as Tekapo Springs, located at 300 Lakeside Drive, Takapō / Lake Tekapo, legally described as Lot 1 DP 49694 and RS 42278 (the site). The general location of the site is illustrated in **Figure 1**, while **Figure 2** provides a close-up aerial photo of the site and the surrounding land.



Figure 1 – The general location of the site is indicated by a red oval. Source. Canterbury Maps



Figure 2 – The boundaries of the site. Source: Canterbury Maps.

16. Tekapo Springs is a nationally and internationally renowned, multi-attraction business offering relaxation and outdoor adventure. It features hot pools, a day spa, and sauna facilities for wellness, alongside family-friendly activities like an ice-skating rink, snow tubing, and at times a summer waterslide.

SUMMARY OF SUBMISSION

17. The submission states that PC29 does not adequately enable the operation, expansion and development of commercial and tourism-related development activities on the site. The submitter seeks to enable further expansion of its business operations. As such, the submission requests that the provisions of PC29 and the extent of the SARZ are amended to better enable commercial and tourism-related development.
18. There are two important components of the relief sought by the submission, being the:
- a. Amendments sought to the SARZ in which the site is located to enable the operation, development and expansion of commercial and tourism-related activities.
 - b. Amendments sought to ensure the land adjoining the site to the west and east is suitably zoned to enable the expansion of the activities on the site.
19. In relation to the first component of the relief sought, the submission seeks several amendments to the SARZ provisions including a new specific control area over the site to support its use for commercial recreation activities and ancillary commercial activities.

20. In respect of the second component of the relief sought, the submitter seeks to extend the SARZ over the adjoining land indicated as 'A' and 'B' in **Figure 3** of this evidence.



Figure 3 – The land the submitter wants the potential to expand into are indicated as 'A' and 'B' in the above image. The site is outlined by a redline. Source: The Tekapo Springs submission.

21. The submission offers an alternative to the primary relief sought being the creation of a new precinct titled the 'Tekapo Tourism Overlay / Precinct', or a new zoning titled the 'Tekapo Springs Special Purpose Zone'. Both would apply to the site and the adjoining land indicated as 'A' and 'B' in **Figure 3**. The rationale for this suggested amendment is to provide a bespoke set of provisions that will suitably enable and manage the development of the site and its expansions into adjoining areas. In effect these are sought in order to achieve a same or similar outcome to that of applying SARZ in the extension areas and otherwise amending the SARZ provisions in order to better support the operation, expansion and development of commercial and tourism-related development activities appropriate within the landscape capacity of the sites.
22. In the event the SARZ is not extended over the adjoining land indicated as 'A' and 'B' in **Figure 3**, the submission seeks several amendments to the Open Space Zone provisions to better provide for commercial recreation and commercial activities, as set out in the submission.

23. An important aspect of the submission is its broad scope. Paragraph 17 of the submission states that the submitter seeks such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments that address the matters raised by the submitter. It also states that a more refined suite of amendments may be provided in any expert planning evidence.
24. The submitter no longer requests an exemption to the SARZ-S1 in relation to its height standard. It is pursuing the rezoning of extension land to SARZ in the first instance, as set out in this evidence.

OFFICER'S REPORT

25. The Council officer's report includes several amendments to the SARZ to address the submission. These amendments are summarised as:
- a. Rezoning of the land to the west of the site from OSZ to SARZ.
 - b. Amendments to Objective SARZ-O1 to include ancillary commercial activities that support the recreational focus.
 - c. The addition of Policy SARZ-P4A to provide for ancillary commercial activities.
 - d. A new rule that will permit 200m² of food and beverage activities.
 - e. A new rule that will permit 100m² of ancillary retail activity.
26. I agree with the above amendments as:
- a. The inclusion of the land to the west of the site will enable an established and regionally significant commercial recreation activity to expand in that direction.
 - b. The amendments to Objective SARZ-O1 Zone will acknowledge the important role of ancillary commercial activities in supporting commercial recreation activities.
 - c. The addition of Policy SARZ-P4A appropriately differentiates the planning approach recognising the established commercial recreation activity is different to other parts of the SARZ.
 - d. The increased food, beverage and retail activities will further enable these ancillary activities.

27. I disagree with the Council officer's recommendations to apply a 2,700m² building coverage standard SARZ-S4 for the Station Bay Specific Control Area. I also disagree with the Council officer's recommendation that SARZ-O2 does not need to be amended. The reason for my disagreement with these matters is set out in the section of this evidence titled 'remaining issues in contention'.

28. The Section 42A officer (Ms. White), the Council consultant landscape architect (Ms. Faulker), the submitter's landscape architect (Ms. Crawford) and I met on 7 May 2025 to discuss remaining points of disagreement. During this meeting Ms. White confirmed that she supports the Submitters proposal for:

- a. Staff accommodation being classified as a permitted activity subject to standards
- b. A landscape plan standard
- c. Rezoning of part of the land Marked 'B' in Figure 3 as SARZ.

29. At this meeting Ms. Faulker confirmed she did not support the increased building coverage on the land marked 'A' in Figure 3 to 40% and did not support the rezoning of eastern most part of the land Marked 'B' in Figure 3 as SARZ.

FURTHER SUBMISSIONS

30. The further submissions from Tekapo Landco and Gotwit Leisure Ltd:

- a. Supports the SARZ zoning of the site and neighbouring properties, along with the Specific Control Area subject to a specific height and building coverage limit to protect the amenity of the area.
- b. Supports the proposed recognition for commercial and ancillary supporting commercial activities in Objective SARZ-O1 and Policy SARZ-P1.
- c. Opposes the enablement of visitor accommodation on the site.
- d. Opposes the proposed amendments to Rules SARZ-R9 and R10 that seek to enable additional retail and food and beverage activities.

MATTERS IN CONTENTION

31. This section of the report provides my response to the remaining matters in contention, which are in summary:

- a. Whether Objective SARZ-O2 is suitable
- b. The extent of the SARZ
- c. Whether the building coverage standard is appropriate for the land to the west and east
- d. Whether staff accommodation should be enabled on the site
- e. Whether a landscape standard is required.

Objective SARZ-O2

32. The Council reporting officer has not recommended any amendment to Objective SARZ-O2. I disagree and consider that this objective should be amended to stipulate the specific outcomes sought for the Tekapo Springs Specific Control Area. Accordingly, I have recommended some amendments to Objective SARZ-O2 in **Appendix 1** of this evidence. The amendments seek to ensure new development:

- a. Aligns with Objective PREC1-O1 and Policy PREC2-P1 of the Tekapo Precinct
- b. Maintains a balance of open space and built form
- c. Is sympathetic to the landscape
- 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.

33. These amendments will help ensure there is clarity about the outcomes sought for the Tekapo Springs Specific Control Area. Also, and importantly, it will differentiate the outcomes sought for the Tekapo Springs Special Control Area to that of the outcomes for SARZ. In this regard, my interpretation of the purpose and outcomes of the SARZ (except the Ruataniwha Specific Control Area) is that it primarily seeks to provide for the district's sports fields and clubs and the like and requires development to be consistent with the character of the adjoining residential areas. This outcome is inconsistent with the

established use and character of the Tekapo Springs site which is a highly commercialised recreational operation that does not involve sports fields and does not directly adjoin any residential zone. Thus, it is important that the SARZ is very specific about the outcomes sought for the Tekapo Springs Specific Control Area.

34. This amendment will also ensure that there is consistency with how the Ruataniwha Specific Control Area is addressed in Objective SARZ-O2.

35. The rationale for my specific amendments to Objective SARZ-O2 is stated below (each sub-clause below corresponds with the sub-clauses of paragraph 32a-b above):

- a. The reference to the objective and policy of the Tekapo Precinct will help plan users understand that those provisions are applicable.
- b. The inclusion of the words *'Maintain a balance of open space and built form'* ensures that the need for open space is considered in any resource consent application to exceed the building coverage limit. It will likely prevent buildings dominating the site.
- c. The inclusion of the words *'Is sympathetic to the landscape'* will ensure that landscape informs building design, location, form and scale.
- d. The reference to landscaping is important as it provides a connection to the new landscaping standard and also articulates the overall outcome sought.

36. Ms Crawford's evidence assisted in the last three recommended amendments.

Extent of the SARZ

37. The Council officer's report did not make a final recommendation on the requested extension of the SARZ to the east of the site marked 'B' in **Figure 3** of this evidence. The reasons the Council officer gives for this position are:

- a. The area is visually sensitive given its location along the lakefront.
- b. Changing the zoning could result in a higher level of built form than is appropriate in this location.

- c. Lack of landscape evidence provided by the submitter at the time of writing the report.

38. However, as stated above, we have meet the reporting officer and the Council landscape architect to discuss this matter and they have agreed in principle to the rezoning of the area outlined in red in **Figure 4** as SARZ. Note that as this area was described verbally in the meeting, it will need to be confirmed by the Council reporting officers.



Figure 4 – The area indicated by the reporting officer's that could be rezoned SARZ is outlined in red. The remaining area is outlined in yellow.

39. This means that the only area still in contention is the area outlined in yellow in **Figure 4**. The Council landscape architect was concerned that this area was too visually sensitive to rezone SARZ.

40. However, the landscape evidence of Ms Crawford has a different view. She considers this matter in detail in her evidence and in summary states that:

- a. This area of land is visually contained and encircled by the steeper slopes of Mt John to the north and west.
- b. This area of land is not classified as an ONL, Lakeside Protection Area and is largely outside the 25m natural character setback provided in Variation 1 to PC23.
- c. The steep topography of this land limits its development potential.

- d. This area is in the shade for most of the day which will reduce visibility of buildings and help them absorbed into the landscape.
 - e. This area is adjacent to an already developed area.
 - f. This area of Tekapo has a long history of active recreation activities (see **Figure 5**).
 - g. This area of Tekapo is undergoing a transition with forestry removal and recently consented residential development increasing.
 - h. Development in this area could be absorbed into the trees, which will soften and screen structures.
 - i. A requirement for a landscape plan would help mitigate landscape effects.
41. Ms Crawford concludes that the provisions of the SARZ chapter together with the PREC1 overlay and the landscape plan will work to maintain the landscape character and values of this area.
42. I agree and note that Figures 3-5 of her evidence illustrate that the landscape and visual effects of the existing Tekapo Springs development are very minimal. Considering that this land to the east of the site is very narrow, between 35-70m, compared with the 178m width of the existing Tekapo Springs site, and also considering that most of this land is too steep to develop, I suspect these factors will reduce the potential visual effects of development on this land when compared to the existing Tekapo Springs development.
43. I have included a new standard requiring a landscape plan for buildings with a floor area of 50m² or more in **Appendix 1** based on Ms Crawfords recommendation. That landscape plan would be required to be prepared by a Registered Member of the New Zealand Institute of Landscape Architects. The purpose of the landscape plan will be to mitigate the adverse effects of the new built form, help the building(s) integrate with the landscape and contribute to the amenity values of the area. I agree with Ms Crawford that this will help mitigate any residual adverse visual and landscape effects of built form in the area to the east of the site.
44. In my opinion, the extension of the SARZ into the land marked B in Figure 3 would also have some economic benefits. It would allow an established, successful and nationally significant commercial recreation activity to continue to consolidate, operate, upgrade,

replace or potentially to expand, and therefore it will support and enhance the economic investment made in that facility and help attract visitors to the area, which will have flow on economic benefits.

45. The expansion of Tekapo Springs into the adjoining land to the east will also help limit the adverse effects of urban development rather than spread adverse effects by forcing future expansion of its operations into out-of-town locations.
46. With the above matters in mind and considering the alignment of this matter with higher order objectives (see my assessment on this below), I recommend that all the land to the east of the site as marked 'B' in **Figure 3** is rezoned SARZ.

Building Coverage Standard

47. A key recommendation of the Council officer's report is to require new development in the Station Bay Specific Control Area of the SARZ to have a maximum site coverage of 2,700m². I disagree with that recommendation for several reasons.
48. Firstly, such a low building coverage, which equates to just 9% of land to the west of the site to be rezoned SARZ, would be an inefficient use of land. This area of Tekapo is spatially constrained by steep topography, State Highway 8, Lake Tekapo and existing activities. Aside from the Tekapo town centre, Lakeside Drive is the busiest part of Tekapo township. Accordingly, it is nonsensical from a land use efficiency perspective to significantly restrict the site coverage of development in this area. It would be more efficient to consolidate development on this land (within reason) as land in this area is a limited resource.
49. Secondly, the site provides an exemplary example of how development in this area should continue. Tekapo Springs has a site of 28% (not counting parking areas) and has been developed in a way that is highly sympathetic to the natural character of the area. It includes areas of native landscaping, rock gardens and buildings which are generally single storey and uses naturally recessive materials and colours. Figures 3 and 4 of Ms. Crawford evidence are informative, providing photos of the Tekapo Springs when viewed from the surrounding area. It is clear to me when seeing these photos that site coverage of the existing site is not an issue.
50. Thirdly, the adjoining area is characterised by active recreation activities (refer to **Figure 5**). This includes a mini golf course, camping ground, water ski club, boat ramp and boat hire

facility to the south-west of the site. There are also significant areas of parking in the area. Accordingly, any future commercial recreation development of the site would be consistent with the nature of the receiving environment.

51. Fourthly, the proposed building coverage limit for the Station Bay Specific Control area is also inappropriate given the urban zoning in proximity to the site that will facilitate additional urban development and further urbanise the character of the area. For instance, the site is located approximately 70m north-east of a large area zoned Medium Density Residential, which has a maximum building coverage of 40%. Further, approximately 400m south of the site is a Mixed Use Zone, which has a maximum building coverage of 45%. This zoning in the vicinity of the site will facilitate significant levels of additional development. Over time, this will increase the extent of built form in the area, further urbanising the area from a character perspective. The operative MDP zoning of the area is illustrated in **Figure 5**.



Figure 5 - The zoning of the broader area that was brought about by PC21 to the MDP. The camping ground in the middle of this image has not been addressed by PC21 and is still zoned Special Travellers Accommodation Zone in the operative MDP. The yellow zoned areas is the Medium Density zone. The site is outlined in red.

52. Fifthly, the landscape evidence from Ms. Crawford attached as **Appendix 2** indicates that new development in this area will be appropriate. Part of the rationale for this conclusion

is that this area is located in the Takapō / Lake Tekapo Precinct, which provides a suite of design controls to manage the potential visual effects of buildings. This includes some restrictive standards that manage:

- a. Materials and colour standards (PREC1-S1)
- b. Roof forms (PREC1-S2)
- c. Building scale (PREC1-S3)
- d. Building height (PREC1-S4)
- e. Garages (PREC1-S5)
- f. Fencing (PREC1-S7) and retaining walls (PREC1-S8)

53. These standards have been designed to implement Policy PREC1-P1 that seeks that:

- a. Built form character of the Township is maintained and enhanced
- b. Development is integrated with the landscape setting, including the topography, landform, and views to and from the area
- c. Key viewshafts within and through land on the south side of State Highway 8 are protected, and accessibility to the Domain and lake are maintained
- d. Views to the lake from properties on the north side of State Highway 8 are maintained.

54. Sixthly, the SARZ zoning of the site is essentially a spot zone (just one site is included at this location), which was presumably an attempt by Council to acknowledge the existing development on the site and enable its continuation. It is therefore nonsensical on the one hand acknowledge the existing development on the site but to significantly restrict its expansion onto the site to the south by way of a site coverage standard.

55. Seventhly, a proposed site coverage of 40% is the same as for the majority of the SARZ zone under Rule SARZ-R4, meaning that it will be consistent with the overall expectations for the zone. Note that as Rule SARZ-R4 applies to the whole zone, outside the Ruataniwha Specific Control Area, there is no need to differentiate SARZ-R4 for the Tekapo Springs site and the land to the west and east. However, the Station Bay Specific Control should not include the area marked 'A' in **Figure 3**.

56. Eighth, the evidence from Ms Crawford is that new landscape standard proposed in this evidence will help mitigate any residual visual and landscape adverse effects associated with new development. She also states it will help integrate buildings into the landscape and enhance the amenity values of the area.
57. Ninth, the Submitter is operating a nationally significant commercial recreation activity. Accordingly, there is a degree of comfort that comes from the notion that it would not make business sense to create a development which has low visual amenity values. The very nature of the core experience they offer is about helping people relax in a tranquil and beautiful environment.
58. I meet with the Council landscape architect on 7 May 2025 regarding this matter and she agreed that the proposed site coverage area was too low, but she also suggested the 40% site coverage was too high. Ms Crawford's evidence is that 40% building coverage is appropriate, and I defer to her evidence considering that the Council landscape architect has not specified a suitable alternative.
59. In summary, the proposed building coverage standard of 2,700m² for the Station Bay Specific Control area is inappropriate for the area marked 'A' in **Figure 3** and should be revised to be 40%. As stated below in this evidence, this will help PC29 align with higher order objectives.

Staff Accommodation

60. The submission requested an amendment of PC29 to enable visitor accommodation on the site. However, subsequent to discussions with the Council reporting officer and the writer, the submitter has clarified that the intention was to accommodate staff on the site rather than visitors. This change of focus is considered to be within the scope of the original submission that sought whatever subsequent relief sought to achieve the submitter's overall intention of expanding commercial activities on the site.
61. The need for the staff accommodation on the site is partly generated by the hours of operation of the activity. Presently the facility is open from 10am to 7pm. However, the star gazing tours go until 2am, while the cleaners start at 4am. These late working hours create difficulties for staff getting to and from work, particularly considering that some of them come from Twizel and Fairlie, which can be subject to severe winter weather driving conditions which is compounded by traveling at night.

62. The submitter has also experienced acute difficulties trying to find accommodation for staff in the area, which can threaten the commercial viability of the facility. While residential zoned alternative land exists in Tekapo, it is prohibitively expensive and not necessarily zoned for the more flexible needs and configurations of staff accommodation.
63. The site also has multiple facilities and therefore it would be ideal from a security perspective to have staff accommodated on site 24/7.
64. A solution to these issues would be to enable staff accommodation on site. This could be limited to ensure scale is managed appropriate to no more than 10 staff. We meet with the Council reporting officer on 7 May 2025 to discuss this matter and she agreed in principle with this proposal.
65. Given the limited nature of the staff accommodation required (10 persons) and the ancillary nature of that accommodation to the primary use of the site for commercial recreation, I consider that it is generally appropriate to enable staff accommodation on the site. Considering the provisions of the SARZ and Lake Tekapo PREC1, I consider that there are sufficient controls on built form to ensure that staff accommodation is consistent with the expectations of the SARZ and the Lake Tekapo PREC1. It is also note that the provision of accommodation on the site will be consistent with the established character of the area which includes an adjacent camping ground that has several small huts and will align with the higher order objectives stated below. is Accordingly, I have recommended a rule in **Appendix 1** that permits staff accommodation subject to standards.

Ownership of Land

61. I am aware of the Hearings Panel's question to the Council reporting officer regarding whether the Submitter has engaged with the landowner (MDC) in relation to the land marked 'B' in **Figure 3** of this evidence. This answer to this question is that the Submitter has formally registered their interest with MDC to purchase this land and has made multiple attempts to discuss this matter with Council officers. I have also requested that the MDC Parks and Recreation Manager confirm the availability of this land and any intentions to develop it on 18 March 2025 and 7 May 2025. Neither the Submitter, nor I, have received any response to any of these queries.
62. As Council has had an opportunity to make a further submission on Plan Change 29 (being their own plan change) and have had ample opportunity to engage with the Submitter, but

have not made any attempt to respond, it is reasonable to conclude that they do not oppose the rezoning of their land. Even if Council did oppose the rezoning, in my view, the Submitter should not be put at a disadvantage if MDC cannot engage in its own statutory process.

63. I also consider that the SARZ will benefit MDC by upzoning their land which previously was intended to be zoned OSZ, which only has a building coverage of the lesser of 5% or 100m², compared to the more enabling building coverage limit of 40% in the SARZ.

64. Ultimately, MDC do not have to sell their land to the submitter. I cannot think of any reason why MDC would be disadvantaged by the rezoning.

65. In conclusion, the rezoning of the land marked 'B' in Figure B will benefit MDC and they will not be disadvantaged.

Alignment with Higher Order Objectives

62. In my opinion, the amendments to PC29 recommended by this evidence better achieves the intentions of the Strategic Directions of the MDP including:

- a. Objective ATC-O1.1 that seeks a range of living options and recreation activities to meet community needs.
- b. Objective ATC-O1.2 that seeks that activities that are important to the community's economic well-being, including appropriate economic development opportunities, are provided for.
- c. Objective NE-O1 that seeks to protect the values of outstanding natural landscapes.
- d. Objective UFD-O1 that seeks that townships grow:
 - i. in a consolidated way
 - ii. that respects the values of the natural and physical environment
 - iii. achieves good connectivity with other parts of the urban area
 - iv. integrates with infrastructure

v. protects highly productive land.

- e. Objective SARZ-O1 that seeks a range of organised other recreational activities, along with other compatible activities that support the community's social well-being.

63. The SARZ zoning of the land to the east, is also consistent with Policy 5.3.1 of the Canterbury Regional Policy Statement that seeks to:

- a. Ensure urban growth occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;
- b. Encourage within urban areas housing choice, recreation and business opportunities of a character and form that supports urban consolidation;
- c. promote energy efficiency in urban forms, transport patterns and site location.

SECTION 32AA RMA FURTHER EVALUATION

64. I now turn to a further evaluation of the changes I have recommended to the provisions of PC29 in accordance with Section 32AA of the RMA.

65. The amendments I have proposed to Objective SARZ-O2 are more effective than the existing objective in achieving the intent of Objective SARZ-O1 (which describes the purpose of the zone), as the amendments clearly articulate the character and amenity outcomes sought in the Tekapo Springs Specific Control Area. This greater clarity will be more efficient than the existing objective by minimising debate through a resource consent process about the expected outcomes in the Tekapo Springs Specific Control Area. The additions to the Objective SARZ-O1 will also be more effective in meeting Strategic Directions objective NE-O1 that seek to protect outstanding natural landscapes and the margins of water bodies.

66. The proposed amendments to the extent of the SARZ, which will include the land to the west and east of the site, will enable Tekapo Springs to grow and develop, thereby and subsequently generating employment, attracting visitors, with consequential flow on economic benefits. This will support the significant investment made in the existing facility and avoid the cost of having to find additional land out of town to expand its operations. It will also avoid the costs of making the public travel to an out-of-town location.

67. The enablement of a modest level of staff accommodation on the site will:

- a. Help Tekapo Springs find and retain employees
- b. Potentially lower accommodation costs for employees
- c. Support the investment made in the existing facility
- d. Reduce health and safety risk of staff travelling to Tekapo Springs from remote locations such as Twizel and Fairlie during winter
- e. Reduce the carbon emissions from staff travelling to Tekapo Springs from remote locations such as Twizel and Fairlie
- f. Enable staff to contribute socially to the community of Tekapo out of work time.

68. Ensuring that the building coverage for the SARZ is at 40% rather than less than 9% will:

- a. Make more efficient use of the urban area in Tekapo which is a limited resource.
- b. Consolidate built form within the Tekapo township rather than requiring it to spread into out-of-town locations.
- c. Support the significant investment made in the existing facility.
- d. Support an existing and successful nationally significant commercial recreation activity to grow.

69. Requiring a landscape plan to be submitted to Council and be prepared by a qualified landscape architect will help ensure that the outcomes of the Tekapo Springs Specific Control Area are achieved. It will also help ensure that the buildings are integrated into the landscape, the adverse effects of built form are minimised, and that landscaping contributes to the amenity of the surrounding area.

70. Given the recommended amendment to the provisions of the SARZ, the provisions of the Tekapo Precinct PREC1, and the expert evidence of Ms Crawford, I consider that the amendments I have proposed will have minimal adverse effects on the environment.

71. With these matters in mind, I consider that the proposed amendments will be more effective and efficient than the proposed provisions of Plan Change 29 in terms of s32AA RMA.

Section 76 RMA

72. Section 76 of the RMA requires that in making a rule, the territorial authority shall have regard to the actual or potential effect on the environment of activities including, in particular, any adverse effect. The landscape evidence provided in **Appendix 2** of this evidence establishes that the potential adverse visual and landscape effects of the development enabled by the amended rules contained in **Appendix 1** will be appropriate.

CONCLUSION

73. The submission from Tekapo Springs sought changes to PC29 to enable the ongoing operation, expansion and development of commercial and tourism-related development activities on their site. The primary relief sought was to expand the SARZ zone into land to the east and west of the site, provide a specific control area over this land specific to Tekapo Springs and amend the provisions of SARZ to ensure that they enabled the operation, development and expansion of commercial and tourism-related activities on the site.

74. The remaining matters in contention are the wording of Objective SARZ-O2, the rezoning of the land to the east of the site SARZ, the building coverage, whether staff accommodation should be enabled on the site and whether a landscaping standard should be required.

75. This evidence, along with the evidence of Ms Crawford, establishes that:

- a. The amendments to Objective SARZ-O2 are appropriate
- b. It is appropriate for the land to the east the site to be rezoned SARZ.
- c. A building coverage of 40% is appropriate.
- d. It is appropriate for staff accommodation to be enabled on the site.
- e. It is appropriate to require a landscape plan with new buildings.

76. Overall, it is considered that the proposed amendments are consistent with the sustainable management of the area.

APPENDIX 1 – RECOMMENDED AMENDMENTS TO PC29

Sport and Active Recreation Zone (SARZ)

Introduction

The Sport and Active Recreation Zone provides for a range of active recreation opportunities, and buildings and facilities which support these. This zone includes large recreation reserves used for organised sports and associated clubrooms, as well as other community facilities. In many cases, these areas also provide for passive recreation opportunities. Many of these areas are publicly owned reserves, but the zone also includes some recreation or community facilities which are privately owned or operated.

The Sport and Active Recreation Zone is located within, or adjoining the District's town and settlements.

The Specific Control Area 14 (Ruataniwha) applies to an area of land which adjoins Lake Ruataniwha, in Twizel, and which contains facilities that support the use of the lake as a rowing course and for other largely water-based recreation activities. This Area is in a visually sensitive location next to the lake and adjoining open space areas.

The Specific Control Area XXX (Tekapo Springs) applies to land at Lakeside Driver, Tekapo, that includes the substantial Tekapo Springs commercial recreation complex. This complex includes a range of commercial recreation activities including pools, saunas, treatment rooms, ice rink, snow tube park, café, star gazing, mini golf and ancillary retail and commercial activities.

The level of built form varies across the zone, with some areas of large open space, as well as a range of buildings, structures and other impervious surfaces which support the recreation and community activities.

Objectives and Policies

Objectives	
SARZ-O1	Zone Purpose
The Sport and Active Recreation Zone contains a range of organised sports and other recreational activities, along with ancillary commercial activities that support the recreational focus, and¹ other compatible activities that support the community's social well-being.	
SARZ-O2	Zone Character and Amenity Values
The Sport and Active Recreation Zone contains a range of buildings, structures and facilities which support the purpose of the zone, and which: <ol style="list-style-type: none">are consistent with the character and amenity values of surrounding residential areas and streetscapes; andin Specific Control Area 14 (Ruataniwha), are visually recessive, maintain the visual amenity of the surrounding area, and maintain public access to the lake and its margins; or<u>in relation to Specific Control Area XX (Tekapo Springs):</u><ol style="list-style-type: none"><u>aligns with Objective PREC1-O1 and Policy PREC2-P1 of the Tekapo Precinct; and</u><u>maintains a balance of open space and built form; and</u><u>is sympathetic to the landscape; and</u><u>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.</u>	

¹ Tekapo Springs (29.03)

Policies	
SARZ-P1	Recreation
Enable a range of recreational, commercial recreation activities and supporting and ancillary commercial activities, including associated buildings and facilities.	
SARZ-P2	Compatible Activities
Provide for community facilities where they do not detract from the purpose, character and amenity values of the zone.	
SARZ-P3	Other Activities
Only allow other activities where they: <ol style="list-style-type: none"> 1. support the community's social well-being; or 2. have a functional need or operational need to locate within the zone; and 3. do not detract from recreational activities or zone character and amenity values. 	
SARZ-P4	Specific Control Area 14 (Ruataniwha)
Enable activities that relate to, and support the Ruataniwha rowing course.	
SARZ-P4A	Specific Control Area XX (Tekapo Springs)²
Provide for commercial activities that are ancillary to and support the recreational focus of the area, where they: <ol style="list-style-type: none"> 1. are not of a scale or nature which detracts from the character, amenity values or purpose of the Town Centre Zone; and 2. they are compatible with the character and amenity values of the zone. 	
SARZ-P5	Built Form
Manage built form within the Sport and Recreation Zone: <ol style="list-style-type: none"> 1. to minimise dominance in the surrounding environment; and 2. in Specific Control Area 14 (Ruataniwha), so that it does not detract from the visual amenity of the surrounding area and maintains public access. 	

Rules

<u>SARZ-R7</u>	<u>Staff Residential Accommodation</u>	
<u>Tekapo Springs Specific Control Area XX</u>	<u>Activity Status: PER</u> <u>Where:</u> <ol style="list-style-type: none"> 1. <u>No more that 10 staff are accommodated on site.</u> 2. <u>The activity complies with the following standards:</u> <ul style="list-style-type: none"> <u>SARZ-S1 Height</u> <u>SARZ-S2 Height in Relation to Boundary</u> <u>SARZ-S3 Setbacks</u> <u>SARZ-S4 Coverage</u> <u>SARZ-S5 Reflectivity</u> <u>SARZ-S6 Servicing</u> 	<u>Activity Status when compliance is not achieved with R.7.1: DIS</u> <u>Activity Status when compliance is not achieved with R7.2: RDIS.</u> <u>Matters of discretion are limited to: the matters of discretion specified in the standard not complied with.</u>

² Tekapo Springs (29.06)

SARZ-R10	Activity Status: PER Where: <ol style="list-style-type: none"> Any food and beverage outlet does not exceed: <ul style="list-style-type: none"> <u>a. 200m² in gross floor area per tenancy in Specific Control Area XX (Tekapo Springs)³; or</u> <u>b. 100m² in gross floor area per tenancy in other areas; and</u> In the Specific Control Area 14 (Ruataniwha), the food and beverage outlet is located in the Building Core area shown on the Outline Development Plan contained in FIGURE SARZ-1. 	Activity Status when compliance is not achieved with R9.1 - R9.2: DIS
SARZ-R11	Retail Activity	
Specific Control Area 14 (Ruataniwha)	Activity Status: PER Where: <ol style="list-style-type: none"> Any retail activity is ancillary to recreational events or activities or training activities; and In the Specific Control Area 14 (Ruataniwha), the retail activity is located in the Building Core area shown on the Outline Development Plan contained in FIGURE SARZ-1. 	Activity Status when compliance is not achieved with R10.1 - R10.2: DIS
<u>Specific Control Area XX (Tekapo Springs)</u>	Activity Status: PER Where: <ol style="list-style-type: none"> <u>Any retail activity:</u> <ul style="list-style-type: none"> <u>a. is ancillary to a commercial recreational activity; and</u> <u>b. does not exceed 100m² in gross floor area per tenancy.⁴</u> 	

Standards

SARZ-S1	Height	Activity Status where compliance not achieved:
SARZ (outside Specific)	1. The maximum height of any building or structure (excluding	With S1.1: RDIS

³ Tekapo Springs (29.08)

⁴ Tekapo Springs (29.09)

Control Area 14 (Ruatanuiwha))	lighting poles) shall not exceed 8m above ground level.	Matters of discretion are restricted to: <ol style="list-style-type: none"> The impact of the increased height on users of the site. The location, design, scale and appearance of the building or structure. Adverse effects on the streetscape. Adverse effects on the amenity values of neighbours on sites containing residential or other sensitive activities, including visual dominance, shading and effects on privacy. The extent to which the increase in height is necessary due to the functional and operational requirements of an activity.
Specific Control Area 14 (Ruatanuiwha)	<ol style="list-style-type: none"> The maximum height of any building or structure shall not exceed 5m above ground level, except that: <ol style="list-style-type: none"> One Control Tower building, not exceeding 12m above ground level, may be located in the Building Core area shown on the Outline Development Plan contained in FIGURE SARZ-1; and One Communications Tower building, not exceeding 18m above ground level, may be located in the Building Core area shown on the Outline Development Plan contained in FIGURE SARZ-1. 	With S1.2: RDIS Matters of discretion are restricted to: <ol style="list-style-type: none"> The impact of the increased height on users of the site. The location, design, scale and appearance of the building or structure. Effects on, and compatibility with, the landscape character of the zone and surrounding environment. Adverse effects on the surrounding Open Space Zone, including visual dominance, and reduction on privacy of the users of the Open Space Zone. The extent to which the increase in height is necessary to support recreation activities.
<u>SARZ-S7</u>	<u>Landscaping</u>	
<u>Specific control area XXX (Tekapo Springs)</u>	<ol style="list-style-type: none"> <u>A landscape plan must be prepared for any new buildings or buildings extension on the site with gross floor area of 50m² or more and submitted to Mackenzie District Council for acceptance. The purpose of the landscape plan will be to mitigate the adverse effects of</u> 	<u>Matters of discretion are restricted to:</u> <ol style="list-style-type: none"> <u>The extent a landscape plan is needed to mitigate the adverse effects of the building, integrate the buildings into the landscape and contribute to the amenity of the area.</u>

	<p><u>the new built form, help the building(s) integrate with the landscape and contribute to the amenity values of the area. The landscape plan must be prepared by a Registered Member of the New Zealand Institute of Landscape Architects, or a full member of that institute.</u></p> <p>2. <u>The landscape plan must be implemented within the first planting seasons after the buildings are completed. Thereafter the plantings must maintained and dead or diseases species replaced.</u></p>	<p>b. <u>The comments from a peer review of the landscape plan if the landscape plan is not prepared by a person that is not formally accredited by the New Zealand Institute of Landscape Architects.</u></p> <p>c. <u>The suitability of the implementation programme for the landscaping.</u></p>
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Amendment to Maps

Amend the e-plan maps of Plan Change 29 so that the area outlined by the redline is zoned SARZ and Specific Control Area XXX (Tekapo Spring).



APPENDIX 2 – LANDSCAPE EVIDENCE OF NAOMI CRAWFORD

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

Statement of Evidence of Naomi Louise Crawford

8 May 2025

Qualifications and Experience

- 1 My full name is Naomi Louise Crawford.
- 2 I hold the qualification of a Bachelor of Design in Landscape Architecture with Honours from Victoria University of Wellington. I am also a registered member of the Tuio Pito Ora, New Zealand Institute of Landscape Architects (**NZILA**) and a member of Te Kahui Ture Taiao, Resource Management Law Association (**RMLA**).
- 3 I am a Director at Glasson Huxtable Landscape Architects in Christchurch, having held this position since September 2023. Previously I was a Senior Landscape Architect within the same company.
- 4 I have practiced as a Landscape Architect for approximately 14 years. For the past eight years, I have also taught into the Landscape Architecture degree programmes at Lincoln University. Previously, I have worked within small landscape firms, a large multi-disciplinary consultancy and in the public sector.
- 5 My experience spans across the full spectrum of Landscape Architecture and Landscape Planning. Some of my previous work includes landscape assessment and design for recreation, sport and tourism complexes, roading and public infrastructure, and commercial, educational, and industrial facilities. I have also previously contributed to plan changes, long-term plans, management plans, feasibility studies, and assisted with the acquisition and disposal of land.
- 6 I am regularly called upon as a Landscape and Visual expert for complex projects involving multi-disciplinary approaches across Aotearoa.

My Role

- 7 I have been involved with Mackenzie District Council's (**MDC**), Plan Change 29 (**PC29**) to the Mackenzie District Plan (**MDP**) since March 2025.¹ My role has been to provide landscape and visual advice to Tekapo Springs Limited (**Submitter**) and their nominated Planner, Mr. Mark Geddes of Perspective Consulting.
- 8 This has included:
 - (a) Visiting Tekapo Springs and the surrounding area (11 April 2025) to understand the site and surrounding context in further detail.²

¹ PC29 involves changes proposed to the MDP through PC29 Open Space and Recreation Zones, Noise, Signs and Temporary Activities, and associated variations.

² I am also familiar with the area having visited Tekapo Springs and stayed in Lake Tekapo on multiple occasions. Prior to the most recent site visit, I last walked around the foreshore in July 2024.

- (b) Undertaking a high-level review of the existing landscape character and visual amenity. In turn, understanding the potential landscape and visual implications arising from PC29.
 - (c) Participating in an online meeting with the MDC Section 42A Officer (Ms. White), Council consultant Landscape Architect (Ms. Faulkner) and the Submitters Planner (Mr. Geddes) on the 7 May 2025.
- 9 In preparing this statement of evidence I have considered the following documents:
- (a) The MDC, MDP Review, PC29 – Open Space and Recreation Zones, Noise, Signs and Temporary Activities (notified 5 November 2024).
 - (b) The MDC, MDP: PC29 Section 32 Report (5 November 2024).
 - (c) My client's submission titled 'Submission of Tekapo Springs Limited (**Tekapo Springs**) on PC29 and 30 to the MDP, prepared by Solicitors from Todd and Walker Law (22 January 2025).
 - (d) A joint submission by Tekapo Landco Limited and Godwit Leisure Limited which also considered the implications of PC29 and requested rezoning of the land adjacent to Tekapo Springs (16 January 2025).
 - (e) Planning provisions relevant to my area of expertise.
 - (f) The evidence of Mr. Geddes (Planning) who is also preparing evidence on behalf of the Submitter.
 - (g) The concepts and principles outlined within Te Tangi a te Manu: Aotearoa Landscape Assessment Guidelines (**TTatM**), NZILA (July 2022).
- 10 Since my evidence was first submitted to MDC on the 24 April 2025, it has been revised to respond to the s42A report and the meeting held on the 7 May 2025. Changes include adding panoramic photographs, revisiting design controls, and discussing the area to the east of the existing Tekapo Springs site in more detail.

Code of Conduct for Expert Witnesses

- 11 While this is not a hearing before the Environment Court, I can 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.

Executive Summary

- 12 My statement of evidence considers landscape and visual matters associated with PC29 and my clients site at Tekapo Springs, located at 300 Lakeside Drive, Lake Tekapo. Having evaluated existing landscape character and values, visited the local area and considered the implications of PC29, I am of the opinion that:
- (a) This part of Lake Tekapo has a long history of 'active' recreational use.
 - (b) The southwestern edge of the lake is undergoing transition with forestry removal and recent residential development increasing density.
 - (c) The proposed Sport and Active Recreation Zone (**SARZ**) is appropriate for Tekapo Springs.
 - (d) 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%.
 - (e) The objectives and policies of the SARZ, together with the PREC1 design controls and the landscape plan offered by the Submitter will work to maintain the identified landscape character and values and protect the visual vulnerability of the area.

Scope of Evidence

- 13 I have prepared evidence in relation to:
- (a) The existing landscape character and values.
 - (b) The applicable statutory provisions.
 - (c) The appropriateness of the proposed zoning and whether it:
 - (i) Could support an increase in site coverage.
 - (ii) Can maintain the identified landscape character and values.
 - (d) Matters raised within the Tekapo Landco Limited and Godwit Leisure Limited submission.
 - (e) Potential design controls.

Introduction

- 14 My evidence is prepared on behalf of Tekapo Springs who submitted on PC29 as part of stage four of the MDP Review.³ The submitter owns and operates the land and business known as Tekapo Springs, located at 300 Lakeside Drive, Lake Tekapo, legally described as Lot 1 DP 49694 (26,824m²) and RS 42278 (2870m²).
- 15 Tekapo Springs is a nationally renowned, multi-attraction business offering relaxation and outdoor adventure. It features hot pools, a day spa, and sauna facilities for wellness, alongside family-friendly activities like an ice skating rink, snow tubing, and a summer waterslide.
- 16 It is my understanding that PC29 proposes to introduce a new Open Space and Recreation Zones (OSRZ) section within Part 3 – Area-Specific Matters of the MDP and Part 4 – Appendices and Maps.⁴ These new zones articulate how each zone is to be managed to provide for the community's well-being. They also state how the amenity values and qualities of each zone are to be maintained and enhanced.
- 17 Tekapo Springs is affected by this zoning change, in that it is proposed to be designated as Sport and Active Recreation Zone (**SARZ**), surrounded by proposed Open Space Zoning (**OSZ**) to the south, west, and east.⁵ The property is also included as part of the Lake Tekapo Precinct (**PREC1**) overlay, which will be extended to incorporate areas zoned SARZ and OSZ within the township.

Figure 1: Submitter's property (Tekapo Springs) and neighbouring properties



³ Refer to the submission of Tekapo Springs Limited on Plan Change 29 and 30 to the Mackenzie District Plan', prepared by Solicitors from Todd and Walker Law (22 January 2025).

⁴ PC29 proposes to introduce the following chapters: Natural Open Space Zone (NOSZ), Open Space Zone (OSZ), and Sport and Active Recreation Zone (SARZ).

⁵ Relevant neighbouring properties, legally described as Lot 6 DP 455053 and Lot 401 DP 560853 are wholly or partially planned to be designated as Open Space Zone.

- 18 Whilst the submitter has outlined the relief sought in their submission, this landscape evidence goes a step further and assesses the implications of PC29 through a landscape and visual effects lens.⁶

Existing Landscape Character and Values

- 19 To understand the implications of PC29 on the Tekapo Springs area, one must first understand the existing landscape character and values. These have been summarised below.

Figure 2: Existing landscape character and values for the Tekapo Springs area

Landscape Values Identified for the Tekapo Springs Area	
Physical Values	
Landform	<ul style="list-style-type: none"> • Lake Tekapo is a glacial lake nestled amongst the mountains of the Southern Alps. There are sculpted landforms, outwash plains and terraces, and angular rocks and rounded river boulders. • Tekapo Springs is nestled in a lakeside basin that resembles an amphitheatre overlooking the lake, encircled by Mt John. • The geomorphology is most obvious where there has been the least development e.g. to the east of the Tekapo Springs where shore benches are visible from the various lake levels. • Steeper slopes are located to the west and north of Tekapo Springs and include the flanks of Mt John (the local landmark).
Landuse	<ul style="list-style-type: none"> • Today Lake Tekapo is a hub for visitors to the Mackenzie Region, Mount Cook National Park, and the Southern Alps. • The lake and surrounding area offers a wide range of activities supported by the village and residential/visitor accommodation. • Active recreation includes water based activities such as: Swimming, boating, waterskiing, wake boarding, fishing, kayaking, and paddleboarding. There is also a waterskiing and powerboat club on the foreshore and water sports hire available. Land based activities include cycling, ice-skating, and tubing. • Passive recreation includes Hiking (Mt John Walkway etc.), running, picnicking, sightseeing, star gazing, play etc. <p><u>Specific to Tekapo Springs:</u></p> <ul style="list-style-type: none"> • Tekapo Springs is a key attraction of the area, blending relaxation, adventure, and natural beauty with a range of year-round activities. • The pools were designed to mimic the region's lakes.
Landcover	<ul style="list-style-type: none"> • There is very little indigenous vegetation near the foreshore. • The site to the south of Tekapo Springs was previously covered in exotic forestry which has been felled. There is forestry slash, with smaller amounts of regrowth and tussock grass. • The site to the north is covered in plantation forestry.
Landscape Features	<ul style="list-style-type: none"> • Lake Tekapo is a Site of Natural Significance. • It is also identified as an Outstanding Natural Landscape.

⁶ Relief sought by the submitter includes that the plan change provisions and zoning locations regarding SARZ and OSZ, and the chapter on Natural Character (NATC) should be amended to better enable commercial and tourism related developments.

Associative Values	
Tangata Whenua Values	<ul style="list-style-type: none"> • Māori would pass through the region on their way to the West Coast. They also carried out seasonal food gathering in the area. • The Māori Name 'Takapō' is from Taka (sleeping mat) and Po (night).
Historic Values	<ul style="list-style-type: none"> • Pioneering sheep farming families settled from 1850. By the late 19th/early 20th century there was a small settlement. • 1940-1950's saw the construction of the Tekapo Hydro Power Station which bought workers and increased infrastructure.
Perceptual Values	
Landscape Character	<ul style="list-style-type: none"> • Picturesque alpine environment, renowned for its visually striking turquoise waters, amongst a stunning mountain backdrop. • Long distant panoramic views across and around Lake Tekapo.
Memorability	<ul style="list-style-type: none"> • Highly identifiable and memorable landscape. • Dominance of the wider natural landscape over built environment.
Transient values	<ul style="list-style-type: none"> • Seasonality with snow and ice, deciduous trees, and lupins. • Transient nature of tourists and visitors supported by residents.
Dark sky reserve	<ul style="list-style-type: none"> • Aoraki Mackenzie International Dark Sky Reserve (est. 2012). • World-class clear stargazing with minimal light pollution.
Climate	<ul style="list-style-type: none"> • Clear, dry climate with cold winters, but high sunshine hours.

- 20 In addition to the above, the southwestern edge of the lake is undergoing a transition period with pine forest removal and the recent residential development of 'Station Bay' occurring adjacent to the Lakes Edge Holiday Park. Parts of these areas are proposed for rezoning as MRZ and ASPZ. This will result in increased density (occupation) of this area.
- 21 The land beside Lakeside Drive has a long history of recreational use that is recognised and valued. The area is dominated by active recreation opportunities, although passive recreation also occurs. There is frequent activity on the lake and around the foreshore as it is used by tourists, holiday makers and locals. This includes swimmers, paddleboarders, recreational boaters (waterskiing, wake boarding, fishing, kayaking etc), and water sports hire.
- 22 On land, opportunities for cycling, running, hiking (the Mt John walkway is accessed beside Tekapo Springs), swimming, ice-skating and snow tubing and sliding also occur nearby. Of note, a mini golf course has been granted resource consent in 2022 (Ref. RM220060) for the area in between the Lakes Edge Holiday Park and the start of the Mt John walking track (beside Tekapo Springs).
- 23 Tekapo Springs itself is nestled in a lakeside basin that resembles an amphitheatre overlooking the lake. It is encircled by the steeper slopes of Mt John to the north and west. The site is visually contained, looking out across the lake. From Lakeside Drive, the existing buildings associated with Tekapo Springs are visible, but their appearance is minimised by their low height, the way in which they sit into the landscape, and the use of recessive colours. Retaining walls, fences, signage and

vehicles in the carpark are more dominant. From Lakeside Drive and on Lake Tekapo itself, the pools are difficult to discern due to the way they sit into the landscape.

- 24 To the east of Tekapo Springs, an area of land at the foot of the existing plantation forestry provides informal vehicle and pedestrian access around the base of Mt John and to the edge of the lake.
- 25 The following panoramas visually illustrate the existing landscape values and character. They are helpful in showing how the Tekapo Springs complex sits into the landscape and is located in one 'corner' of the lake.

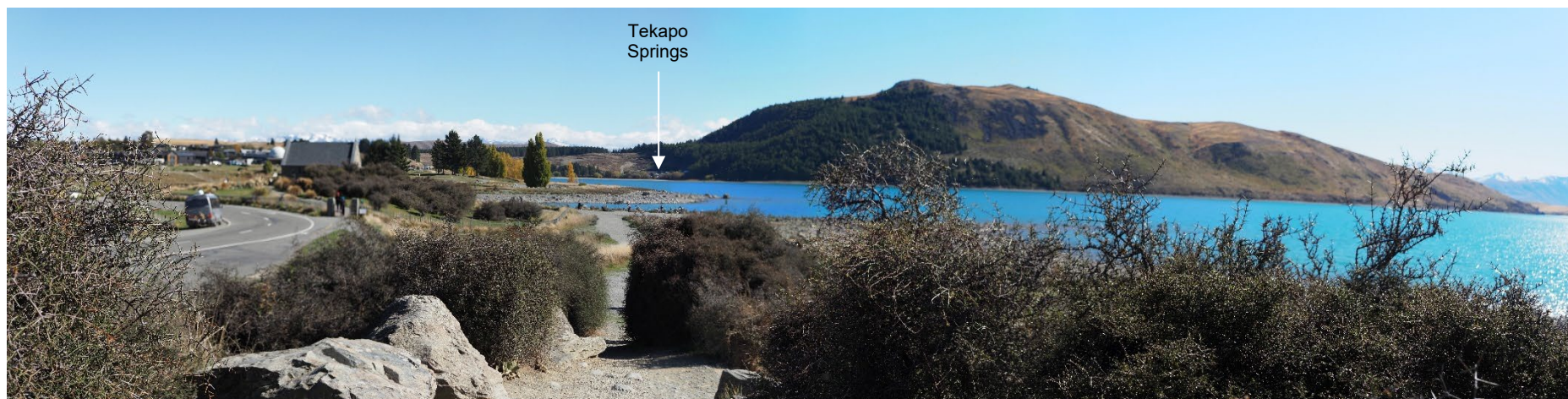


Figure 3: Looking northwest towards Tekapo Springs (2km away) from 'The Sheepdog Memorial'. Panorama taken on the 11th of April 2025 using an OM System OM-5 camera with a 25mm lens (equivalent to a 50mm focal length). This is a public viewpoint.



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.

Statutory Context

26 According to the MDP EPlan Tekapo Springs has the following statutory provisions:

- (a) It is currently located in a Recreation A (Active) Zone.
- (b) It is located within an area of visual vulnerability (as is much of Tekapo).
- (c) It is proposed to be within a Sport and Active Recreation Zone (SARZ).
- (d) It is proposed to be covered by the Tekapo Precinct (PREC1) Overlay.

27 Neighbouring statutory provisions include:

- (a) The sites either side of Tekapo Springs being currently located in a Recreation P (Passive) Zone.
- (b) The lake itself being both an Outstanding Natural Landscape (ONL) as well as having Sites of Natural Significance (SNA).
- (c) The MDC owned site to the north (including Mt John) continuing to be a General Rural Zone (GRUZ).
- (d) The sites to the east, west and south of Tekapo Springs being proposed as Open Space Zone (OSZ).
- (e) The proposed Open Space Zone (OSZ) extending out into the foreshore of the lake (the existing Recreation P Zone also does this).
- (f) Large parcels of land to the south being zoned either Medium Density Residential (MRZ) or proposed Accommodation Special Purpose (previously Special Traveler's Accommodation Zone (STAZ)).

Figure 7: Proposed zoning in relation to Tekapo Springs (highlighted)

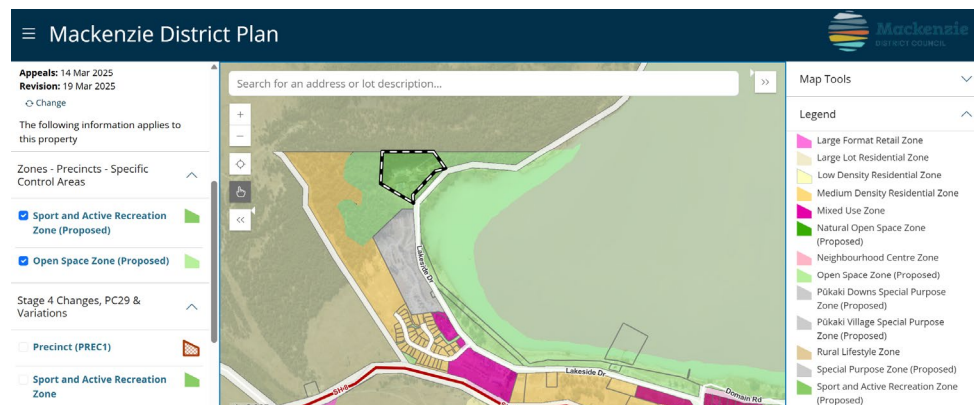


Figure 8: ONL and SNA sites in relation to Tekapo Springs

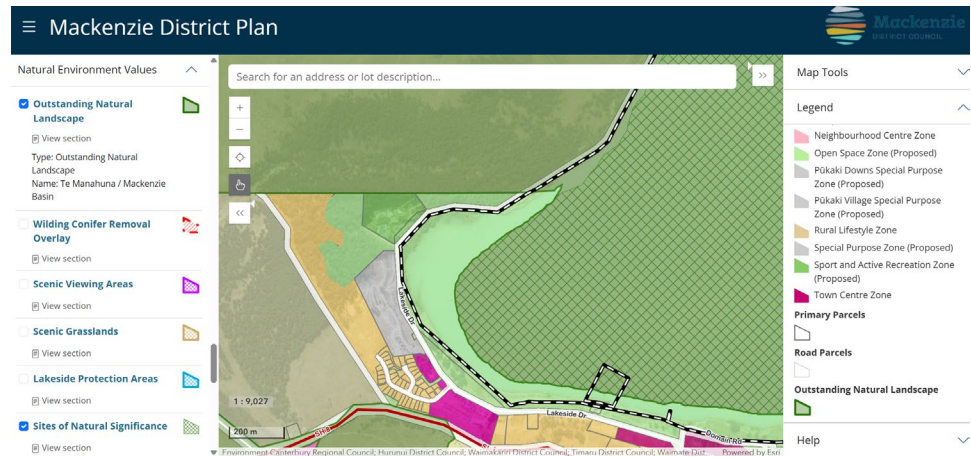
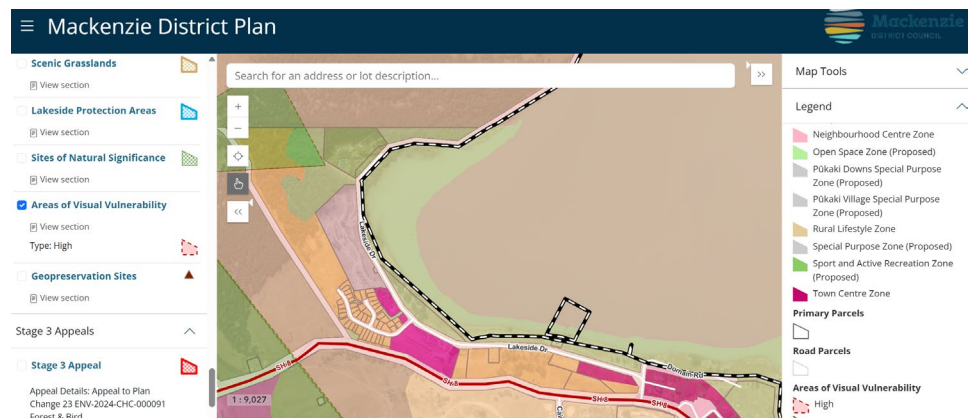


Figure 9: Areas of visual vulnerability in relation to Tekapo Springs



Appropriateness of the Proposed Zoning

- 28 Tekapo Springs is affected by PC29 in that it is proposed to be designated as SARZ, surrounded by proposed OSZ to the south, west, and east.⁷ The submitter opposes in part in relation to their property and in relation to that of neighbouring properties.
- 29 The submitter considers that the proposed plan change does not adequately address nor make allowance for commercial and tourism related development, redevelopment, expansion, operation, and futureproofing for Tekapo Springs (particularly on adjoining sites).

⁷ Relevant neighbouring properties, legally described as Lot 6 DP 455053 and Lot 401 DP 560853 are wholly or partially planned to be designated as Open Space Zone.

- 30 Within this section of my evidence, I will consider the statutory provisions for each of the proposed zones including and surrounding Tekapo Springs as to whether they:
- (a) Could support an increase in site coverage.⁸
 - (b) Can maintain the identified landscape character and values.
- 31 I also consider at what threshold I believe unreasonable (more than minor) adverse landscape and visual effects may occur from future development.
- 32 Figure 10 compares the statutory provisions applicable to landscape matters across the zoning types surrounding Tekapo Springs alongside the PREC1 overlay.⁹
- 33 Having evaluated each of the five zones (in the table that follows) it is concluded that:
- (a) The purpose of the OSZ is informal and provides passive recreation opportunities, whereas the purpose of the SARZ is for active recreation, which may be supported by buildings and facilities.
 - (b) The OSZ aims to limit the amount of built form, retain a clear predominance of open space, and maintain uninterrupted views. The SARZ aims to manage built form to minimise dominance in the surrounding environment.
 - (c) The OSZ provides for a maximum height limit of any building or structure as 5m above ground level, whereas the SARZ is 8m (excluding lighting).
 - (d) The OSZ has a maximum building coverage of 5% or 100m² (whichever is lesser), whereas the SARZ allows for a maximum of 40%.
 - (e) Both the OSZ and SARZ require a Light Reflectance Value (LRV) of no more than 40%.

⁸ The increase in site coverage considers both the 10% site coverage proposed for the SARZ in the Tekapo Landco Limited and Godwit Leisure Limited submission (16 January 2025) AND the notified site coverage of 40% for SARZ under PC29.

⁹ If the zoning chapter and precinct chapter of the MDP contain a rule/standard managing the same thing (e.g. height), the applicable rule or standard in the precinct overlay takes precedence.

Figure 10: Statutory provisions comparison of landscape matters (paraphrased)

Statutory Provisions Comparison Between the Different Zones around Tekapo Springs					
Zoning and Provisions	Medium Density Residential (MRZ)	Rural Zone (GRUZ)	Open Space Zone (OSZ)	Sport and Active Recreation Zone (SARZ)	Lake Tekapo Precinct Overlay (PREC1)
Purpose	Provides for higher density residential living opportunities, and other compatible activities. (MRZ-O1)	Prioritises primary production and activities. Also provides for other activities where they rely on the natural resources found only in a rural location. (GRUZ-O1)	Provides areas of open space which predominately provide for a range of passive recreational activities. (OSZ-O1) <ul style="list-style-type: none"> Provides for informal use. Provides for passive recreation opportunities. Anticipates limited built form. Reflects the dominance of open space. Maintains lake views and accessibility to the lake. (MDP Review, PC29) 	Contains a range of organised sports and other recreational activities that support the community's social well-being. (SARZ-O1) <ul style="list-style-type: none"> Provides for a range of active recreation opportunities and supporting buildings and facilities. Includes large recreation reserves and clubrooms for organised sports as well as other community facilities. Has areas of publicly owned reserves and also some areas that are privately owned or operated. 	Development within Lake Tekapo maintains the distinctive character and identity of the Township and is complementary to the surrounding landscape. <ul style="list-style-type: none"> The PREC1 overlay applies to many different zones within the Lake Tekapo township. The controls within the precinct are intended to ensure that development is sympathetic to the character of the town and the surrounding landscape.
Typology	A range of housing typologies including detached, semi-detached, terraced housing and low rise apartments. (MRZ-O2)	Activities such as primary production, recreation and tourism, residential, accommodation, buildings and structures, rural industry, camping, forestry, conservation activities, shelterbelts, quarrying, and community and educational facilities.	OSZ contains limited facilities and structures which... maintain the predominance of open space. (OSZ-O2) OSZ enables informal recreation opportunities and facilities including walking and cycling connections, toilets, playgrounds, sporting equipment and picnic and BBQ areas. (OSZ-P1)	Enables a range of recreational and commercial recreation activities with associated buildings and facilities. Also allows for buildings and structures, parking areas, food and beverage outlets, retail activity, and community facilities. (SARZ-P1)	Controls the scale, appearance and location of buildings to ensure that: <ol style="list-style-type: none"> The built form character is maintained and enhanced; Development is integrated with the landscape setting. Key viewshafts are protected. Accessibility to the lake is maintained. (PREC1-P1)

Zoning and Provisions	Medium Density Residential (MRZ)	Rural Zone (GRUZ)	Open Space Zone (OSZ)	Sport and Active Recreation Zone (SARZ)	Lake Tekapo Precinct Overlay (PREC1)
Density	Minimum site area per residential unit is 400m ² . (MRZ-S1)	The minimum net site area per residential unit is 100ha. (GRUZ-S1)	Limit the scale of built form within OSZ to: 1. Retain a clear predominance of open space; and 2. Maintain uninterrupted views... (OSZ-P4)	Manage built form within the SARZ to minimise dominance in the surrounding environment. (SARZ-P5)	The precinct overlay has standards for: C1-S1: Materials/colours C1-S2: Roofs C1-S3: Building Scale C1-S4: Height C1-S5: No build areas C1-S6: Garages C1-S7: Fencing C1-S8: Retaining Walls and Level Changes
Building height limit	Maximum height of any building or structure is 7.5m (except a gable roof is 8.5m at the peak. (MRZ-S2)	Maximum height of any building or structure is 15m for farm accessory buildings or 9m for all other buildings. (GRUZ-S4)	Maximum height of any building or structure is 5m above ground level. (OSZ-S1 where compliance not achieved).	Maximum height of any building or structure (excluding lighting poles) is 8m above ground level. (SARZ-S1)	Outside a specific control area: The maximum height of any building or structure is 7.5m above ground level, except a gable roof may be 1m higher. (PREC1-S4)
Site coverage	The maximum building coverage of any site is 40%. (MRZ-S5)	The maximum building coverage of any site is 35% or 500m, whichever is lesser for sites less than 1ha; or 5% for all sites greater than 1ha. (GRUZ-S3)	The maximum building coverage of any site is the lesser of 5% or 100m ² . (OSZ-S2)	The maximum building coverage of any site is 40%. (SARZ-S4)	Top of terrace: Maximum height of any building or structure is 5m. Bottom of terrace: Maximum height of any building or structure is 12m. (Or the height of the nearest point of the terrace top, whichever is the lesser). Has specified 'no build' areas.
Landscaping	The minimum landscaping on any site shall be 30%. (MRZ-S6)	Not specified.	Planting must not include any wilding conifers. (OSZ-R4)	Planting must not include any wilding conifers. (SARZ-R5)	Not specified.
Reflectivity	Not specified.	Not specified.	Any building or structure shall be finished in materials with a light reflectivity value (LRV) of no more than 40%. (OSZ-S4)	Any building or structure shall be finished in materials with a light reflectivity value (LRV) of no more than 40%. (SARZ-S5)	Not specified.

Suitability of the OSZ

- 34 Retaining the proposed OSZ for the sites to the east, west and south of Tekapo Springs would result in a maximum site coverage of 5% (or 100m²), whichever is the lesser. This limits future types of activity and site coverage. In addition, such a low site coverage is inconsistent with the MDZ zone nearby which allows for 40% site coverage.
- 35 Other OSZ areas nearby include the passive areas around the lake foreshore (near the township). One such area is carpark/lookout area at the start of Lakeside Drive which has recently been upgraded. These fit well with the existing landscape character and how those areas are currently used.

Appropriateness of the SARZ

- 36 In terms of the submitters proposal to extend the SARZ zone to the areas to the east, west and south of Tekapo Springs, I generally have no issue with this from a landscape perspective. This is because:
- (a) It is aligned with the active recreation activity already occurring nearby at Tekapo Springs and on the lake (previously described in this evidence).
 - (b) Active recreation (as opposed to passive) matches the character of the area, when considering the range of activities already on offer.
 - (c) The area is in a state of transition and the density of nearby areas is increasing.
 - (d) Design controls through the objectives and policies of the SARZ, the requirements of the PREC1 overlay and the assurance of a landscape plan will ensure the existing landscape character and values can be maintained.

Area of High Visual Vulnerability

- 37 According to the MDP EPlan, Tekapo Springs is located within an area of high visual vulnerability, despite the established character of the township. The visual vulnerability overlay currently has no rules attached to it, which makes things difficult from a planning perspective. However, the proximity to the Lake Tekapo SNA and ONL areas, justifies the PREC1 design controls in regard to visibility.

Height Standards

- 38 The OSZ provides for a maximum height limit of any building or structure as 5 metres above ground level, whereas the SARZ is 8 metres (excluding lighting columns). Both of these amounts may be superseded by the controls within the PREC1 overlay. PREC1 allows for an increase in height (outside of specific control

areas) depending on the situation. This states that the maximum height of any building or structure shall not exceed 7.5 metres above ground level.¹⁰

- 39 In situations such as at the bottom of a terrace, PREC1 allows the maximum height to be increased to 12 metres above ground level (or the height of the nearest point of the terrace top, whichever is the lesser). This is likely because the addition of the building or structure can be somewhat absorbed by the landscape it sits within and in front of.¹¹ Nearer the top of the terrace the maximum height is decreased to 5 metres, presumably because any new structure or building is likely to be more prominent.
- 40 **I agree with the height standards as they are outlined within the SARZ and PREC1 overlay.** I believe that they respond well to the topography and offer flexibility in terms of where buildings and structures are placed and the resulting visual effect.

Comment on the land to the east

- 41 In regard to the 'finger' of land located to the east of Tekapo Springs, it should be noted that the OSZ already gives some flexibility to develop this area to a small degree. Building coverage is to be the lesser of 5% or 100m² (OSZ-S2). Any future development in this location also still needs to comply with the objectives and policies of the SARZ and the requirements of the PREC1 overlay.
- 42 Landscape effects on this 'finger' of land were raised by Ms. Faulkner within the meeting on the 7 May 2025. Ms. Faulkner's concerns were in regard to the level of development which could occur and the subsequent visual prominence if this land was to become SARZ, considering its location adjacent to Lake Tekapo.
- 43 In response, I have the following comments to make:
- (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).¹²
 - (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.
 - (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.

¹⁰ With a gable peak allowed 1m higher.

¹¹ For reference, the tallest existing retaining walls around the Tekapo Springs carpark are approximately 5-6 metres tall. Siting new structures at or towards the bottom of the hill works better from an effects perspective.

¹² 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.

New elements would also be viewed this way and absorbed into the background easier than if they were viewed in full or partial sun.

- (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.
- (e) Any new development could be integrated within the trees, using them to help soften and screen structures or built form.

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.
- (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.
- (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.

45 I believe that Ms. Faulkner's issues with the level of development and visual prominence could be alleviated by either:

- (a) Reducing the extent (length) of SARZ in this area, meaning it would not extend as far towards the headland (as suggested by Ms. Faulkner herself).
- (b) Requiring Resource Consent for new development in the northernmost part of this area so that the effects of development are closely considered.

46 In my view though, these measures would be a cautious approach, considering the design controls already in place through the SARZ and the requirements of the PREC1 overlay, plus the assurance of a landscape plan being provided.

Site Coverage

- 47 Further comments on site coverage for the remainder of the proposed SARZ areas are addressed in the following section of my evidence as a response to the submission by Tekapo Landco Limited and Godwit Leisure Limited.

Maintenance of the identified landscape character and values

- 48 **I believe 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** including the adjoining Lake Tekapo ONL. Future development is informed by policies which retain viewshafts or dominant views towards the lake, balance open space and built form, and work to maintain the distinctive character and identity of Lake Tekapo in a way that is complementary to the landscape.

Landco Limited and Godwit Leisure Limited Submission

- 49 I have read and considered the joint submission prepared by Tekapo Landco Limited and Godwit Leisure Limited. On page 7, the author comments that the notified OSZ is *“an effective ‘roll over’ of the currently operative ‘Rec P’ Zone,”* which was established in response to the (previous) forestry and steep topography.
- 50 A Landscape Assessment prepared by Mr. Richard Tyler of Site Landscape Architects was also appended to the submission. This considered the rezoning of part of the land adjacent to Tekapo Springs to SARZ (which is what my submitter is also advocating for).
- 51 Mr. Tyler mentions on page 2 of his assessment that: *“The proposed rezoning would change a part of the notified OSZ to MRZ on the upper terrace, and SARZ on the steeper slopes below.”* In terms of effects, he mentions on page 4 that: *“The proposed zone will allow for more favourable activities such as active recreation or commercial recreation activities to be developed on these slopes.”*¹³
- 52 I agree with most of Mr. Tylers findings that:
- (a) Rezoning the land to SARZ may enable potential land use similar to the adjacent Tekapo Springs.
 - (b) The terrain and steepness of the slope will be a somewhat limiting factor for development.

¹³ As an aside, the only notified SARZ land in Tekapo is Tekapo Springs, the Tekapo Community Hall and the tennis courts.

- (c) Any future buildings associated with a new landuse will be viewed against a backdrop of the terrace landform.
 - (d) The extension of the MRZ will result in an increase in the built form nearby.
 - (e) Landscape values including iconic and key views are able to be maintained.
- 53 However, Mr. Tyler notes that a SARZ area coverage of 40% (as notified) could be excessive for the sloping site and could potentially compromise landscape character values by dominating the landform with built form. He recommends that a site coverage limit of 2700m² (10% of the area) is applied so that green open space and unbuilt areas continue to dominate the slope, while still accommodating some buildings integrated into the landform.
- 54 **I believe that 10% site coverage for the SARZ is unreasonably low because:**
- (a) The existing Tekapo Springs site has a higher site coverage of 28%.¹⁴
 - (b) The land is not an Outstanding Natural Landscape or Feature.
 - (c) The location in one 'corner' of the lake, within and around a basin limits adverse effects from increased site coverage due to:
 - (i) The forestry plantation to the north appearing darker and providing shadow for a large part of the day, which helps to mitigate changes in the foreground.
 - (ii) The foreshore vegetation helping to absorb new buildings and structures behind.
 - (d) It is also inconsistent with the MDZ zone nearby which allows for a site coverage of 40% with buildings up to 7.5 metres high.¹⁵ Of note, the MDZ is closer to the ridgeline as viewed from the lake and on Lakeside Drive and structures which break the skyline always have a greater visual effect.
 - (e) Design controls are provided through the SARZ, PREC1 overlay and the assurance of a landscape plan.
- 55 All of the above points will work together to limit adverse effects from increased site coverage. Therefore, **it is my opinion that with design controls in place, the 'as notified' site coverage of 40% for the majority of the SARZ is reasonable** and

¹⁴ The 28% calculation does not include parking areas but does include the slide.

¹⁵ 8.5 metres high at a gable peak.

could be applied to the land that the submitter requests is rezoned SARZ.¹⁶ In other words, a balance between active recreation opportunities (and buildings and facilities which support these) and unbuilt areas can be achieved.

- 56 Of note, if the site coverage was higher than 40%, I believe unreasonable (more than minor) adverse landscape and visual effects may occur. From a landscape and visual effects perspective, items which would result in increased adverse effects include many buildings/structures being clustered together, brightly coloured buildings/structures, issues with glint and glare, unnecessarily steep rooflines, and built form breaking the skyline.

Potential Design Controls

- 57 Having considered the proposed controls for development in the SARZ and the PREC1 Overlay, I generally consider there will be adequate mitigation for adverse landscape and visual effects.
- 58 I believe the only shortcoming is that there is currently no requirement for a landscape plan. This addition would be valuable in:
- (a) Managing a balance between open space and built form.
 - (b) Developing the area in a way which is sensitive to the existing landscape (by carefully considered building location, design, form and scale).
 - (c) Enhancing the amenity of the area through landscaping.
 - (d) Reducing overall effects which may result from future development.
- 59 Accordingly, I have recommended a landscape plan is required for new development over 50m² in floor area in the Tekapo Springs SARZ precinct.
- 60 **I agree with all suggested edits to the objectives and policies and support the idea of a specific control area for Tekapo Springs.** I recommend that this area is applied to both the existing Tekapo Springs area and the proposed SARZ extension around it.

Conclusion

- 61 Within this statement of evidence, I have considered the landscape and visual matters associated with PC29 and my clients site at Tekapo Springs. Having

¹⁶ The exception to this 40% is the furthest most point of the eastern SARZ area discussed previously in my evidence.

evaluated existing landscape character and values, visited the local area and considered the implications of PC29, I am of the opinion that:

- (a) This part of Lake Tekapo has a long history of 'active' recreational use.
- (b) The southwestern edge of the lake is undergoing transition with forestry removal and recent residential development increasing density.
- (c) The proposed Sport and Active Recreation Zone (**SARZ**) is appropriate for Tekapo Springs.
- (d) 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%.
- (e) The objectives and policies of the SARZ, together with the PREC1 design controls and the landscape plan offered by the Submitter will work to maintain the identified landscape character and values and protect the visual vulnerability of the area.

Naomi Louise Crawford

Dated this 8th day of May 2025