

BEFORE THE MACKENZIE DISTRICT COUNCIL

IN THE MATTER

of Plan Change 13 to the operative Mackenzie
District Plan

AND

IN THE MATTER

Submissions and Further Submissions by
Simons Hill Ltd, Simons Pass Ltd and Pukaki
Irrigation Ltd

Statement of evidence Prepared by Christopher Raymond Glasson

11 September 2008

Introduction

1. My full name is Christopher Raymond Glasson. I have the qualifications of a B.A, Dip LA, and I am a Fellow and Registered member of the NZILA. I have practiced as a Landscape Architect for the past 28 years, the last 21 as Director of Chris Glasson Landscape Architects Limited, based in Christchurch.
2. The practice has undertaken many land based projects throughout New Zealand and overseas.
3. Relevant previous landscape planning and design projects in Canterbury have included Mt Cook Village and National Park (1980-present), Twizel reserves assessment, Lake Alexandrina assessment, Pukaki Downs subdivision of 15 lots (2007), CPW, Mt Cass windfarm, numerous subdivisions and Rolleston new town.
4. I have been involved in similar planning processes, most notably identifying ONL's for the Banks Peninsula District Plans and a Variation for the Banks Peninsula District Plan. This culminated in an Environment Court hearing in February 2008.
5. Not only have I undertaken this extensive array of projects but I have a thorough knowledge of the high country landscape, both working and holidaying in such majestic landscapes.
6. I have read the Environment Court's Code of Conduct for Expert Witnesses as set out in the Environment Courts Code of Practice, and confirm that I have complied with the code in the preparation of my evidence.

Location

7. Simons Pass and Simons Hill Stations are part of the Mackenzie Basin. It is a landscape of dry outwash plains between Lakes Pukaki, Benmore and Tekapo. Generally the land is below 600m, but there are isolated hills up to 1000m including the Mary Range and Simons Hill. The combined stations are bounded by Lake Pukaki, the Pukaki and Tekapo Rivers, Maryburn and State Highway 8.

Scope of Evidence

8. I have been engaged by Simons Hill and Simons Pass Station's to undertake a landscape assessment of these stations, and review the Council's landscape assessment in relation to these two sites.
9. In my evidence I address the following matters in terms of the Mackenzie District Councils Plan Change 13:
 - The classification of the Basin as an outstanding natural landscape
 - The classification of Simons Pass and Simons Hill Station's as areas of outstanding natural landscape
 - The capacity for development in the Basin

I visited the Stations on 27 August during fine weather conditions. Photographs and plans are appended to my evidence.

The Mackenzie Basin character:

10. The Mackenzie Basin is a special place with its own distinctive identity. While there have been numerous changes and additions to the landscape over many years, its identity remains relatively consistent.

Characteristics include:

- vastness of scale
- sense of openness
- a range of naturalness from the high quality of the Southern Alps to the modified flats area.
- large panoramic views
- mountain and hill backdrops to all views
- large turquoise blue water bodies
- contrasting landforms, and colours
- high and majestic mountains
- defined limits of vision
- tawny colours of hills
- isolated coniferous shelterbelts
- small and isolated villages
- high country farming practice

The most enduring landscape features of the basin are, its vastness, containment and grandeur of the backdrop and these contribute mostly to the basins identity.

11. The Mackenzie Basin has been modified by man since his arrival. In gaining a living and developing his economy, man organised his life around the natural environment in terms of the techniques available to him, and the values that he set. The modification that man has initiated in the basin has increased with the length of occupation, development of skills, and growth in numbers.

12. The forest and scrubland vegetation was transformed into montane tussock grasslands by both periodic natural fire and around 600 years ago by Polynesian burning. With the advent of European pastoralism as the major land use in the upper Waitaki, from the 1850's onward, animal grazing became firmly established. This often eliminated or severely reduced the frequency of tall tussock at lower altitudes and native grass species and, in conjunction with the introduction of rabbits in the 1880's led to the development of the current widespread short tussock grassland in the basin.

13. The existing vegetation is very much a depleted fescue tussock grassland with much hawkweed , matagouri, scrub, divaricating coprosma, sweet briar, scrub kowhai and corokia can be found scattered throughout the basin.
14. The most significant modification other than the introduction of farming was the advent of the Upper Waitaki power scheme and the transformation of Twizel. Roothing, raising of the lakes, removal of Pukaki village, increasing the size of Tekapo village, canals, dams, penstocks, a rowing course, and the new town of Twizel were all changes, yet they are now an accepted part of today's landscape and contributing to the identity of the Mackenzie Basin. Commercial woodlots are prevalent throughout the basin, along with wilding pines.
15. The indicators of this modified landscape include, in many areas, a lack of reduced vegetative land cover, the dark green colour of coniferous shelterbelts and woodlots, the emerald green of some grass land, the presence of housing and lifestyle blocks within Twizel and Tekapo, and isolated ones adjacent to lakes, and the presence of isolated industrial structures associated with the hydroscheme. Such changes are not evident everywhere in the basin. For example, housing and lifestyle blocks are mainly within or on the outskirts of the towns.

Plan Change 13

16. The stated objective of the Council Plan Change is to protect the Mackenzie Basin from inappropriate subdivision, use and development on the premise that the entire Basin is an outstanding natural landscape. The outcome is to create Mackenzie Basin sub zones with controls over subdivision and building locations. The only areas identified as potentially available for subdivision and dwellings are portrayed as nodal areas within the Densem assessment.

~~IX~~

Outstanding natural landscapes (ONL)

18. The Council's landscape assessment by Graham Densem has accepted the broad brush findings in the Canterbury Regional Landscape Study (1993) of the Mackenzie Basin as being an Outstanding Natural Landscape (ONL). The Study did not actually define what an ONL was and only paid scant respect to the Mackenzie Basin by devoting half a page in the two volume study. Densem as well, has not produced any more detailed analysis in order to grade the level of landscape quality throughout the basin. It has blanket coverage as being ONL with very little justification. For Densem's study to have credibility a detailed analysis should have been undertaken.

19. An appropriate assessment method, and this is not the only method, would have been to assess the landscape units of the basin. It is always easier to assess a landscape in smaller units eg: the Lake Pukaki environs, Pukaki flats etc. By doing this, careful analysis of the finer grain of the landscape can be undertaken followed by an evaluation of how to treat this landscape unit, what parts are of higher/outstanding quality than others. For example, the Lake Pukaki basin, the Southern Alps and Ben Ohau Range are of outstanding quality, but the Pukaki River flats, I am of the opinion that there are no ONL's. Therefore the treatment of these two landscapes would be different.

20. Each unit would then be assessed in terms of:

- (i) Landscape Character, which comprises landform, landcover and landuse. Each unit will have a dominant expression. For example, the Pukaki flats is a flat landscape with straight lines, of fine texture and the pattern is geometric. This is not an intricate landscape but absorption of development can be achieved.

(ii) Landscape Quality. The attributes of quality are naturalness, sensitivity, visibility, rarity and harmony (coherency). The overall significance of a landscape unit to the District can be determined by these factors. For example the Pukaki Flats could be assessed accordingly by:

- naturalness – moderate (modified)
- sensitivity – moderate to high (open with some semi enclosure)
- rarity – moderate to low (repeated elsewhere in the District)
- coherence – moderate (holds together reasonably well)
- visibility – high to low (dependant on location)

21. To be rated in this fashion, the Pukaki flats would then be of moderate significance. To understand a landscape unit's significance will assist decision makers in determining the kind of management, which is appropriate for the unit. Eg: because the part of Simons Pass Station adjacent to SH8 is highly visible, then perhaps a buffer zone without buildings is appropriate, whereas at a further distance from the road it is less visible and buildings could be appropriate.

22. There are areas within the basin that are clearly ONL – that is why the majestic peaks are in Mount Cook National Park and the Ben Ohau Range are in conservation estate. However, to compare the river flats of Simons Pass and Simons Hill Stations with Mount Cook National Park and deem them to be an ONL is a misnomer and highly contentious. An ONL is the highest order landscape. Mr Densem has exhibited no rigour or rationale as to why the whole of the basin is an ONL.

23. It should be recognised in Variation 2 to the Banks Peninsula District Plan (C45/2008), that the Court dismissed Environment Canterbury's classification of 73% of rural land of Banks Peninsula as an ONL. The Court believed that if as much land was classified as ONL it would be an imposition on rural activities and land uses. The same could be said of the land within the Mackenzie Basin and the existing and future land activities and uses.

24. As well the determination of an ONL should not just be left to the landscape architect. To classify a landscape as an ONL has serious implications to landowners. A landscape architect may be able to determine an ONL as part of their assessment, but other disciplines need to assess the effects of the ONL for the Plan Change. This method was used for the formulation of Waimakariri and Hurunui District Plans, where ecologists, farm advisors, scientists etc and the community drew on their collective experience to determine the worthiness of landscapes within these districts. Here there is a common direction with both functional and aesthetic implications.
25. At a recent seminar of 50 of New Zealand's experienced landscape architects, definitions of commonly used terms were discussed. It was commonly agreed that an ONL was an "exceptional" and "remarkable" landscape. It has a "wow factor", and that ONL's are a subset of outstanding landscapes. They could be determined from the biophysical or perceptual qualities they possess.
26. In the Environment Courts findings (WESI and others v QLDC c 180/1999) an ONL is "conspicuous, eminent, especially because of excellence" and "remarkable in" (page 48).
27. An accepted approach to determine an ONL is by using the list of factors from the Courts Findings (WESI v QLDC 2000). These factors being natural science, aesthetic, legibility, transient values, shared and recognised values and tangata whenua values. The court recognizes that these are not the only factors that could be applied, but does place an emphasis on natural science and legibility. Certainly the legibility of the landscape is a key factor for the Mackenzie Basin.
28. Applying these accepted criteria, I therefore believe that the important considerations are:
- i. That there is a gradation of landscape quality within the Mackenzie Basin from a moderate quality to an outstanding quality. By this I mean that:

- Southern Alps
- Ben Ohau and Two Thumb Range
- Nauman Range
- Lakes Pukaki Tekapo Ohau
- Benmore Range
- Tekapo River
- Lake Alexandrina
- Pukaki River
- Mary Range
- Basin flats

outstanding

diminishing
landscape
quality

moderate

This was most evident on my site visit when there was low cloud cover for part of the day and the peaks were obscured. The flats and hills south of Lake Pukaki appeared, to say the least, of moderate quality. However, when the mountain peaks came into view these were the landscape features that were of the highest quality because of their legibility, form and colour contrast, memorableness, complete naturalness and uniqueness. The Ben Ohau Range, the Southern Alps, Two Thumb and Nauman Ranges Lakes Pukaki, Tekapo and Ohau could be considered to be ONL areas of the Mackenzie Basin.

- ii. There needs to be a distinction between the views of the ONL areas and the ONL's themselves. The views themselves incorporating the foreground cannot be considered an ONL but, it is the backdrop that could be considered an ONL. The same could be said of the view of the Canterbury Plains and Southern Alps. The Plains are not an ONL but the backdrop is. The Canterbury Plains and the flats of the Mackenzie Basin are full of diversity and are working landscapes, e.g. wilding pines, soil eroded farms, industrial and agricultural

structures etc. A distinction must be made between the backdrop and the modified foreground. In my view, what is worthy of ONL status has been protected by means of National Park status or as conservation estate. No further protection should then be required. If any more landscapes are to be added to the District's inventory of ONL, they need to be defined following a rigorous and accepted methodology.

Landscape Character of Simons Pass and Simons Hill Stations

29. These Stations form an integral part of the basin landscape. Broad river flats, low and steep ranges and low rolling moraine hills are the essential characteristics. Homesteads, houses, farm sheds, and high country farming operations are located adjacent to State Highway 8, while shelter belts and amenity trees are adjacent to the home blocks and are being intermittently located on the farms themselves. The flat land of Simon Pass Station is not currently grazed. The boundaries of the two blocks are well defined by the Pukaki, Tekapo and Maryburn rivers and Lake Pukaki abuts part of the northern boundary.
30. It is a landscape that cannot be fully realised while travelling on SH8 through the basin as well as being seen momentarily at 100km/hr. On close inspection the farms are full of indentations and undulations making these places less visible and where developments could be easily placed without unduly interrupting the landscape character and quality of the basin.
31. The scale of the river flats, like the whole basin, is vast and even the long shelterbelts and pylons have very little visual effect. Due to the close proximity to the highway, the houses and farm sheds have a noticeable presence, but these provide welcome cultural relief to the uninterrupted views of the mountain grandeur, as well as reflecting the long habitation that the

Mackenzie Basin has experienced. They are not adverse and do not detract from the identity of the Basin.

32. I believe that there are no ONL areas on Simons Pass and Simons Hill. A detailed site inspection revealed just how capable the farm stations are of absorbing development and changes to farming practices. The most northern part of Simons Pass Station is adjacent to Lake Pukaki. From the lake the land rises steeply to a plateau area which forms part of the moraine hills, classified as a node in the Councils landscape assessment. The northern ridge of this plateau of the moraine hills is a location from where one can gain a view of Mount Cook with Lake Pukaki in its foreground. Because of the importance of this view and environs adjacent to the lake, in the time available to assess the two stations landscapes, this is the only obvious area on the stations where building development should not occur.

Visual Amenity Value

33. Under section 7c of the RMA, particular regard must be given to “the maintenance and enhancement of amenity values”. In relation to the Mackenzie Basin, the values include those which characterise the place as being remoteness and isolation of the location where solitude and tranquillity can be experienced, the ability to attain very large panoramic views, and to be part of a rugged and open grassland landscape unimpeded by trees. Farming contributes to the amenity of the basin because it has determined the land use of the flat land, hence amenity values have also been created by the impact of human activity.

34. These values can be influenced by such factors as where one experiences these values from, who is viewing it (residents, travellers, recreationalists), the degree of change in the landscape a viewer can accommodate, and the value inhabitants place on a location. Both Simons Pass and Simons Hill Stations have a moderate to high amenity value. Should intensification of farming

practices and developments occur, then there is potential for that amenity to change. Changing the status quo does not necessarily create a negative visual amenity, because amenity can be affected by many variables eg: composition of the view, people's response to change, the dominance of the changes, and the scale of the landscape. These areas are visible against a massive backdrop and are minute in comparison with the vast scale in which they appear. The amenity value remains intact and this change does not have to be a negative one.

35. The same occurs in the Upper Manuherika Valley near St Bathans where parts of the valley floor are modified due to irrigation, fertilizer application, ploughing and grazing. At times of the year the valley floor appears as green swards rather than as a tawny tussockland. However, such is the majesty and grandeur of the Hawkdun and St Bathans Ranges and the tussock grassland terraces, that the green valley floor occurring in springtime does not detract from the inherent visual amenity values.

36. The majority of the views of Simons Pass and Simons Hill stations are experienced from the state highway (locals and tourists) and for fishermen on the Tekapo River. There is also a line of willows along the Tekapo River which further restrict views into the stations. For the remainder of the station, it is seldom appreciated by the public. Fleeting views are gained from the state highway and from the Tekapo River. There are parts of the station that will never be visible.

Potential for Development

Scale of the Landscape

37. This is a huge landscape that can absorb appropriate change without the basin losing its identity. The Mackenzie Basin has discrete areas of development. The location and size of Twizel is barely visible, Tekapo is grouped into a contained crescent shaped landform below the skyline, and Mount Cook

village only becomes visible to the traveller on arrival. Even the planned Pukaki village of 1975, and the more recently proposed site, were sensitively located above the road and out of view shafts.

38. One of the characteristics of the basin is that there are many types of landforms making for discrete locations of development. Together with the vastness of scale and the lack of public viewpoints, other than from the roads, this is a landscape that can absorb development if undertaken in a sensitive manner and without it being detrimental to, or compromising the overall landscape character and visual quality of the basin. In my opinion it would be possible to put together a suite of rules and parameters to secure this outcome such that the Council could be satisfied that compliance with those parameters would ensure an acceptable result.

Nodal Concept

39. Nodal type developments are what essentially exist in the basin and to continue this concept makes sense. While I concur with the identification of landscape sub-areas by Densem, there is a lack of flexibility in terms of location, size and the general workability of his concept in terms of changes in land use and activities.
40. Nodal developments are particularly suitable for residential or village development but may not be suitable or necessary for farming purposes. Currently the land practices are generally for extensive grazing purposes and farm dwellings are well separated. However, this could change to smaller units due to the presence of irrigated land. Mr Fastier has described that there would then be a need for further farm dwellings, and not necessarily in a cluster style of development, but as individual buildings. This scenario could be accommodated in my opinion by a nodal concept that is more flexible.
41. For example, on the Simon Pass Station the node on the Pukaki River is totally inappropriate. This node is south-west facing, within the river terrace formation, and a long distance from services. Because this node is out of the

main viewshed from SH8, this does not justify it as a suitable node. The scale is vast, and there are discrete areas in the “south basin” on the Pukaki flats (south of Lake Pukaki) that can absorb development subject to appropriate standards.

42. The Council’s landscape assessment has identified another development node as being on the moraine hills at the northern end of Simons Pass Station. The landscape is undulating with hillocks and tarns. It is more suited to a village concept than dwellings for farming operations. Unless it is a village it is an impractical location in which to build.

Visibility

43. The Council’s nodal concept is based on the assumption that if a development is visible then it has a negative effect. Places like Twizel are barely visible to a passing motorist, while Tekapo is contained within a landform and Mount Cook Village is well integrated into the landform and the place is celebrated as a unique solution. The same could occur elsewhere in the basin. A house or cluster development need not be totally hidden but if well located and designed it could integrate with the landscape and be embraced by the public. A new house on Simons Hill Station, while visible from SH8, fits well due to siting, design and colour. It appears as a recessive building. These are the types of controls that could be used to allow for a level of permitted development.

Vulnerability

44. The Densem assessment discusses vulnerability of areas within the basin and gives them a ranking of low, medium and high. Nowhere is “vulnerability” defined. Vulnerability could be defined as being “ *a measure of the landscape units susceptibility to visible degradation of quality, based on its naturalness and extent of sensitive areas.*” (MWD ‘Natural; Resources of the Canterbury Region’, 1983).

45. This landscape is no more vulnerable to change than many others. The important point to understand is the significance of a change and that it be undertaken in a sensitive manner. Take for example the upper Waitaki hydro scheme. It is a huge project causing an initial change to the landscape, but because of the methods undertaken in its design and implementation it has not had an undue effect on the identity and visual quality of the basin.

46. All landscapes can be vulnerable to changes in landuse and development. However, the key factor is where change is located and how it takes place. The south and central basins are no more vulnerable (classified as being of high vulnerability in the Densem report) than the edge of Lake Pukaki (medium vulnerability). In fact in some places, like the southern part of the south basin, I believe the vulnerability would be very low to development because it is a less sensitive area and able to be more easily integrated due to undulating landforms.

Sensitivity

47. While the landform of Simon Pass and Simons Hill Stations remains intact and of moderate to high naturalness the landcover is highly modified. The sensitivity for these stations varies, dependent on the viewsheds from public viewpoints. Sensitivity diminishes the further one moves away from the road, river and lake edges. This is such a vast scale that developments can be placed easily without causing visual degradation. I refer again to the township of Twizel. It has been easily absorbed without unduly affecting the intactness and coherence of the basin, even with the addition of 2ha allotments. The southern end now has the lake as its boundary. Twizel does not have a negative effect on the basin.

48. The flats are so vast, so distant and so undulating due to old watercourses that development could be easily absorbed.

Development Controls

49. I concur with the Densem assessment about the potential development of subdivisions, “to lessen the landscape values of the basin”. Change will occur, if market forces prevail, and farms do not want to remain in a perilous state with soil erosion, wilding pines and other factors dominating operations. It is a fine balance of a place retaining its character and one which is a landscape with viable production and prosperity. Change will be inevitable to farming practices in the basin because without viable production and prosperity the landcover will gradually be eroded, wilding pines will increase in dominance and the rabbit population will escalate. All these matters will have the potential to change the character and identity of the Mackenzie Basin.

50. I believe that there is capacity for a level of permitted and controlled development throughout the basin subject to appropriate controls. The task of preparing such controls and standards requires care, time, and consultation. I turned my mind to the task of how it could be achieved in the time available, and I concluded that I could not re-write the plan change. However, principles could be employed so as to ensure that developments would be appropriate.

Conclusion

51. On close inspection of the Mackenzie Basin I can conclude that it is a modified landscape exhibiting different farming practices and management regimes.

52. The basin floor is no more an outstanding landscape than the Canterbury Plains and should not be classified as such. I have been through the same exercise on the Banks Peninsula Plan Variation where the Court has rightly concluded how much of an imposition on landowners and operators it would be if the majority of rural land on Banks Peninsula was classified as an ONL. The Mackenzie District Council must recognize it has a similar issue on its hands with the Mackenzie Basin. It would be unwise to be inflexible in classifying landscapes as such and creating development nodes in inappropriate locations.

53. How best development can be provided for without destroying the qualities and characteristics of environment and communities is the key issue. It is a challenging balancing act. However, successful solutions grow from a comprehensive understanding of the problems and opportunities that must be overcome to establish suitable areas for development. Balancing the needs of the landowner, tourist, environment and community with imaginative design is the challenge to all those concerned.

54. The Council's current approach is flawed and requires a lot more consideration and thought before it places controls and limitations on rural landscape activities and developments. Decisions on the landscape can only be made once an appropriate assessment has been undertaken.

Appendices : Graphic Supplement