

**BEFORE COMMISSIONER PANEL APPOINTED BY
MACKENZIE DISTRICT COUNCIL**

In the matter of the Resource Management Act 1991

And

In the matter of an application by Godley Peaks Station Limited to establish a Homestead and Accessory Buildings at Godley Peaks Station, Lake Tekapo.

**EVIDENCE OF BENJAMIN ESPIE ON BEHALF OF
GODLEY PEAKS STATION (LANDSCAPE)**

16 March 2026

Duncan Cotterill

Solicitor acting: Katherine Forward / Derek
McLachlan
PO Box 5, Christchurch 8140

Phone +64 3 379 2430

katherine.forward@duncancotterill.com
derek.mclachlan@duncancotterill.com

MAY IT PLEASE THE PANEL:

CREDENTIAL AND EXPERIENCE

Current Position

- 1 My name is Benjamin Espie. I am a director of Vivian and Espie Limited, a resource management and landscape planning consultancy based in Queenstown.

Qualification and Experience

- 2 I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the New Zealand Institute of Landscape Architects and was the chairman of the Southern Branch of the New Zealand Institute of Landscape Architects between 2007 and 2016. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004, I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council.
- 3 The majority of my work involves advising clients regarding the management of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development. The primary objective of these assessments and evidence is to ascertain the effects of proposed activities in relation to landscape character, values and visual amenity.
- 4 Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications in the rural landscapes of the various districts of the South Island. I have prepared many assessment reports and briefs of evidence relating to proposed activities and proposed plan provisions in the Mackenzie District.
- 5 I have been engaged by the applicant to give expert landscape evidence in respect of RM240167, an application for the construction of a homestead dwelling and accessory buildings on Godley Peaks Station.

6 I prepared a Landscape and Visual Effects Assessment Report, dated the 9th of December 2024, that was submitted with the RM240167 application (the V+E Report).

7 I have reviewed the application as notified, the submissions received and the Section 42a Report dated the 3rd of October 2026 (the s42a Report). I have also reviewed the landscape peer review work prepared by Yvonne Pfluger of Boffa Miskell, being:

7.1 An initial landscape recommendations report dated the 29th of October 2025 (**the initial BM report**), and

7.2 A landscape peer review report dated the 3rd of October (the BM peer review).

8 Between the time of the initial BM report and the BM peer review, a number of amendments were made to the proposal, as is explained below. Since the time of the BM peer review, further amendments have been made, as will also be explained. The various amendments have been made in order to respond to issues raised by the BM reports and the s42a Report.

9 I have visited the site and its surrounding vicinity a number of times.

Environment Court Practice Note

10 I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

11 The methodology for my assessment work of has been guided by Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (TTatM)¹ and by the landscape related Objectives, Policies and provisions of the E-Plan.

¹ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architecture, July 2022 (**TTatM**).

- 12 When describing effects, I use the hierarchy of adjectives given in the bottom row of the table below. The upper two rows show how the adjectives that I use can be related to specific wording within the Act²

LESS THAN MINOR			MINOR		SIGNIFICANT	
LESS THAN MINOR			MINOR		MORE THAN MINOR	
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

THE AMENDED PROPOSAL

- 13 The details of the amended proposal are set out in information that forms part of the resource consent application and in the evidence of other witnesses (including plans, elevations and digital images). By way of brief summary:

13.1 The proposed homestead comprises of an 800m² dwelling, a 100m² garage, a 90m² winter garden building and a 400m² workshop. The built components are to be clad in stacked stone and roofed in slate or dark grey Coloursteel (previously proposed copper roofing is not part of the amended proposal).

13.2 The homestead is located close to Lake Tekapo on land that is currently improved pasture. Earthworks are proposed to excavate a build area for the buildings. The built components are of simple gabled forms. The pitch of gables and proportions of built components have been designed to reflect traditional rural architecture. The components vary in height, with the highest gable apex of the house being 8.5m above floor level (which is below existing ground level) and the highest gable apex of the workshop/shed being 9m above floor level (again, below existing ground level).

13.3 Proposed earthworks were amended following notification and the initial BM report. They have since been further amended in that the proposed workshop has been moved 45m to the south and its floor level (and therefore roof level) reduced to be 3m lower than originally. The amended earthworks design includes significant mounding (to be vegetated) to the north of the workshop building in

² TTatM, paragraph 6.39.

order to hide it in views from the lake surface. These amendments have been at the recommendation of the BM peer review.³

- 13.4 Also since the time of the initial BM report, the wintergarden building has had its overall height reduced by 1m. Amended earthworks also include significant mounding to the north, east and south of the wintergarden, again, to hide this building in views from the lake surface. The apex roof height is now 744.7masl. This apex roof height was remodelled by Mr Burgess to update his glint/glare assessment (Recommendation 6).
- 13.5 As set out in the evidence of Mr Baxter, an extensive area (2.5ha) around the homestead buildings is to be planted out in native vegetation. The amended design (since the time of notification and the initial BM report) includes additional native screening planting that will further reduce visibility of the proposed buildings. This includes clusters of high vegetation to the north of the buildings and significantly wrapping around the southern parts of the buildings. Combined with the amended earth mounding and building locations/heights, planting will very significantly screen built form, particularly the workshop and wintergarden buildings. Bands of fast-growing, non-spreading pines (*pinus attenuata* x *radiata*) are proposed to assist in the establishment of the native vegetation regime, by providing shelter. This exotic planting will be removed once native vegetation is established.
- 13.6 In response to recommendations of the BM peer review and the s42a report, the proposal now includes the registration of a covenant to the effect that buildings will be prohibited over a 12.7ha elevated part of the existing FBA. In terms of enabled built development, this effectively, this reduces the size of the Godley Peaks Station FBA by 12.7ha. A covenant as outlined in proposed condition 30 is the preferred mechanism, but Mr Vivian's evidence preserves scope for alternative mechanisms if required.
- 13.7 The proposal also includes the implementation of a Farm Biodiversity Plan (**FBP**), with an associated proposed covenant being the mechanism of ongoing enforcement/monitoring. The FBP has been formulated to maximise ecological improvements and will also have landscape and visual benefits, in particular the removal of 13ha of

³ The workshop building has been moved as per Figure 5 of the BM peer review.

crack willows, the planting of 2m wide bands of mixed native shrubs around the perimeters of the existing pivot irrigated areas (a total length of 8km), as well as the retirement and protection of valuable biodiversity areas of the station and replanting/management of seven wetlands.

13.8 Part of the FBP relates to an area of “lake face planting”, being an area where native dryland grey shrub species are to be planted into an existing area of scattered grey shrub vegetation, for the purposes of biodiversity enhancement. In response to recommendations of the BM peer review, the application has been amended such that this planting, which consists of 1,000 new plants, is now to be done over a shortened period of 2 to 3 years, is to be arranged as clusters at 1m spacings in currently open areas within the existing scattered vegetation, and is to use shelters and mulch to assist plant establishment. It is proposed that this area of planting remains in the FBP, reflecting its dual purpose as both mitigation and enhancement, as is discussed further below.

13.9 The refurbishment of five backcountry huts (including three on DOC land) is included in the proposal, as is a contribution to the construction of a new Cass River Bridge.

GUIDANCE FROM STATUTORY DOCUMENTS

14 Pursuant to both the Canterbury Regional Policy Statement (**CRPS**) and the Mackenzie District E-Plan (the **E-Plan**)⁴, the proposed dwelling and accessory buildings are located within an Outstanding Natural Landscape (**ONL**), being the Mackenzie Basin. With regard to the E-Plan, the activities are also located within a Lakeside Protection Area (**LPA**), but not within a lake or lake margin.

15 The V+E Report sets out the relevant Objectives and Policies that give guidance on landscape matters. By way of summary, key guidance Can be taken from the following:

Objective NFL-O2

Te Manahuna/Mackenzie Basin ONL

⁴ I understand that the E-Plan can be treated as operative, except for some specific parts that are subject to Environment Court appeals.

1. *To protect and enhance the outstanding natural landscape of Te Manahuna/the Mackenzie Basin ONL, in particular the following characteristics and/or values:*
 - a. *the openness and vastness of the landscape;*
 - b. *the tussock grasslands;*
 - c. *the lack of houses and other structures;*
 - d. *residential development limited to small areas in clusters;*
 - e. *the form of the mountains, hills and moraines, encircling and/or located in, Te Manahuna/the Mackenzie Basin; and*
 - f. *undeveloped lakesides and State Highway 8 roadside.*

Policy NFL-P1

Protection of Outstanding Natural Features and Landscapes

Recognise the values of the identified ONF and ONL overlays on the Planning Maps and protect these values from adverse effects by:

1. *avoiding inappropriate subdivision, use and development in those parts of outstanding natural features and landscapes with limited capacity to absorb such change;*
2. *avoiding inappropriate use and development that detracts from extensive open views, or detracts from or damages the unique landforms and landscape features;*
3. *managing building density, scale and form to ensure it remains at a low level, maintains a predominance of vegetation cover and sense of low levels of human occupation;*
4. *avoiding buildings and structures that break the skyline;*
5. *ensuring buildings and structures are designed to minimise glare and the need for earthworks, and are mitigated by plantings to reduce their visual impact where appropriate;*
6. *recognising and providing protection for identified values in Sites and Areas of Significance to Māori; and*
7. *recognising the existence of working pastoral farms and their contribution to the outstanding natural features and landscapes of the Te Manahuna/Mackenzie District.*

Policy NFL-P5

Lakeside Protection Areas

1. *To recognise the significance of the lakes of Te Manahuna/the Mackenzie Basin, their margins and settings to Kāi Tahu and to recognise the special importance of Te Manahuna/the Mackenzie Basin's lakes, their margins, and their settings in achieving NFL-O2.*

16 Essentially, the provisions require the protection of the values of the Mackenzie Basin ONL. The provisions then give some guidance regarding these values, emphasising openness, vastness, lack of houses, residential development in clusters. Also, particular overlay areas are identified for particular consideration such as LPAs, Scenic Viewing Areas and Scenic Grasslands. As is discussed below, further guidance regarding existing landscape values can be taken from Appendix 4 of the CRPS.

THE EXISTING LAND USE AND ITS VALUES

17 The values of the existing landscape are discussed in detail in the V+E Report. The BM peer review agrees with the V+E report in this regard. While taking account of the regional-level description in Appendix 4 of the CRPS, the V+E Report describes the values of the Mackenzie Basin as follows:

- i The vast, open, glacially-created physical form of the basin. The grand-scale basin floor punctuated by glacier-fed lakes, dominated by open grassland vegetation, and surrounded by the high, hulking forms of the mountain ranges. The patterning of land use which has contributed to openness and sparseness, with a general scarcity of buildings and structures and a clustered settlement pattern.*
- ii The associations with pre-European history and cultural values and also colonial history associated with high-country farming. The engineering history relating to the large-scale hydro generation operations. Recreational use of the landscape in terms of the network of public land and trails and also use of the lakes and rivers.*
- iii The dramatic and highly memorable scenic and aesthetic qualities that stem from the physical composition of the landscape. Long views over open, dun-coloured plains and/or blue lake surfaces to imposing and empty surrounding mountain ranges. Constantly changing light and atmospheric conditions. The experiential qualities of sparse settlement and expansive farming land use.*

18 Obviously, the above description relates to the Mackenzie basin as a whole. The subject site itself takes in 2,676ha of farmland that will be held as

freehold⁵. In its northwestern part, it takes in the lower, gentler slopes of the southern part of the Hall Range. Most of the site consists of outwash plain topography associated with the Mistake and Cass Rivers, where they drain into Lake Tekapo, with the Cass River forming a southern edge to the site. Approximately the eastern half of the site takes the form of more improved pasture, fenced into many paddocks and punctuated with shelterbelts and woodlots. The improved pasture is generally irrigated with pivot and k-line irrigation. It is on this improved pasture that the proposed homestead dwelling is located.

19 Approximately 2.5km west of the proposed dwelling location is the 63.6ha Farm Base Area (**FBA**) of Godley Peaks Station, adjacent to Godley Peaks Road. This FBA provides for considerable development, in the form of both farm infrastructure and rural living development, as elaborated upon in the V+E Report.

20 The E-Plan maps identify the location of the proposed dwelling as being within an area of High Vulnerability. The same is true of most of the station's FBA. Large areas of Low Visual Vulnerability are shown as covering parts of the improved paddocks east of Godley Peaks Road and on the fan landform to the south of the Mistake River.

21 With reference to TTatM, we note that rating an area's vulnerability is to make a generic rating:

Generic attributes such as sensitivity and capacity are necessarily imprecise because they estimate a future. They can be useful and necessary in policy-based assessments, or in comparing alternative routes/localities, but they become redundant once the actual effects of a specific proposal can be assessed directly.⁶

22 In this instance, we have the ability to assess the actual effects of a specific proposal directly, and hence generic ratings such as a rating of visual vulnerability becomes redundant. A more specific, site-based assessment is to be preferred over reliance on generic attributes, which is the assessment exercise Ms Pfluger and I have undertaken.

⁵ As discussed in the V+E Report, Godley Peaks Station is near the end of a tenure review process. Appendix 1 to the V+E Report is a set of plans showing the outcome of the tenure review that is subject to the completion of that process.

⁶ TTatM, paragraph 5.49.

- 23 E-Plan Policy NFL-P2(3)(b) seeks an assessment of landscape character sensitivity, which is again a generic rating. The issue of sensitivity is discussed throughout the V+E Report; the relevant location is part of an LPA (although is not within a lake margin) but is also part of the improved home paddocks area of Godley Peaks Station. While part of the Te Manahuna/the Mackenzie Basin ONL, the location is a more modified part of the basin compared to most locations and is not part of a Scenic Viewing Area or any Scenic Grassland.

VIEWS AND VISUAL EFFECTS

- 24 *Visual effects are effects on landscape values as experienced in views. ... For example, a proposal that is in keeping with the landscape values may have no adverse visual effects even if it is a large change to the view. Conversely, a proposal that is completely out of place with landscape values may have adverse effects even if only occupying a portion of the view*⁷.
- 25 The V+E Report notes that new or changed elements in the landscape resulting from the proposal that have the potential to be visible are:
- i. The proposed homestead including its various built components and garden areas as well as their use and occupation;*
 - ii. The landscape planting in the vicinity of the homestead;*
 - iii. Vehicle track upgrade work and associated earthworks including the new stretch of track accessing the homestead location;*
 - iv. Vegetative changes as a result of the implementation of the FBP in the form of:*
 - Ongoing vegetative enhancement of the Mistake River catchment, which has public access up it;*
 - Ongoing vegetative enhancement of McCabe's Block, which has public access immediately adjacent to it and is close to the lake;*
 - New areas of native vegetation within the various wetlands within the improved paddocks areas. A number of these are visible to the public via Godley Peaks Road and the corridors of the Cass and*

⁷ TTatM, paragraph 5.58, 6.25 and 6.27.

Mistake Rivers. These will emerge over time to develop into nodes of dense, varied riparian natives;

- *Bands of new mixed native shrub vegetation around the pivot irrigated pastures. These will be able to be seen horizontally from various locations and hence will emerge to appear as long upright sweeps of native vegetation that is varied in terms of height, texture and colour;*
- *The removal of large areas of crack willows will mean a visual absence of this exotic monoculture.*

26 The V+E Report includes a full description and evaluation of the visual effects of the proposal as experienced from various locations. At the time the V+E Report was prepared, we had the benefit of the December 2024 Baxter Design document, including its photos, images and photo simulations. As has been discussed, since that time (and in response to the initial BM report and the BM peer review), various amendments have been made to the proposal, most relevantly the lowering of the wintergarden, the relocation and lowering of the workshop building, increased mounding/contouring to obscure built form, increased planting around and to the north of the buildings, and the removal of copper roofing. These amendments are discussed in Mr Baxter's evidence including associated plans and elevations, the result being that built form is now more hidden from the various viewpoints than was previously assessed, therefore the degree of visual effect has reduced.

27 As mentioned in paragraph 13(viii), an area of lakeside native grey shrub enhancement forms part of the FBP. This vegetation is primarily a biodiversity enhancement and it will not act to screen proposed built form. However, when viewed from the east, this vegetation area will also serve to tie the homestead buildings and the vegetation that will surround them into a broader pattern of vegetation that follows natural topography, thereby assisting in visually integrating the new elements into the landscape. While this planting was initially proposed on the basis of ecological enhancement, I agree with Ms Pfluger's assessment that these plantings also hold mitigation value, particularly over the longer term.

28 In the table below, I summarise my considerations regarding visual effects as experienced from the locations that are most relevant. In accordance with the Panel's Direction 1, I focus on the matters raised within the 42a Report. I summarise the findings of the V+E Report and give an updated finding in light of the current amended proposal. I also include a summary of comments

from the BM peer review, bearing in mind that the BM peer review, of course, does not take account of subsequent amendments to the proposal that have been made in response to its recommendations (i.e. relocation and lowering of the workshop building and the prohibition of buildings over 12.7ha of the existing FBA). As can be seen in this table, my assessment of the original proposal was that the landscape and visual effects could be categorised as ranging up to “minor”, pursuant to the TTatM scale (apart from some short-term visual effects from particular viewpoints). The Applicant has now proposed additional mitigation to ensure consistency with opinions of 42a Report and Peer Reviews, and in my opinion, the effects of the proposal can now squarely be categorised as ranging up to minor at most, even in the short term.

DEGREE OF ADVERSE VISUAL EFFECT BY VIEWING LOCATION			
Viewing Audience	V+E Report	My updated consideration	BM peer review
Public land on the Hall and Gammick Ranges	Very low	Very low	
The eastern side of Lake Tekapo	Very low	Very low	Low initially, reducing to very low.
Public areas on the western side of Lake Tekapo	Cass river delta: low, then reducing over time. Lake edge to the north (Viewpoints H and I): moderate, reducing to moderate-low.	Cass river delta: very low, then reducing over time. Lake edge to the north (Viewpoints H and I): low-moderate, reducing to low.	Lake edge to the north (Viewpoints H and I): moderate initially, reducing to moderate-low.
The lake surface	Close locations to the north / northeast: moderate, then reducing over time.	Close locations to the north / northeast: low-moderate, then reducing to low over time.	Close locations to the north / northeast: moderate initially, reducing to moderate-low.

	More distant locations: low at most.	More distant locations: very low at most.	
--	--------------------------------------	---	--

- 29 In arriving at my updated considerations, I have taken account of the amended proposal as depicted on plans and elevations attached to the evidence of Mr Baxter and Mr Whittaker. I note that automatic irrigation is to be provided to all planted areas around the homestead buildings for at least 3 years and areas of fast-growing *Pinus attenuata x radiata* are proposed to provide shelter to areas of native planting. Increased areas of native beech and *pittosporum* are proposed, including sizable areas to the north of the dwelling. Coupled with lowered and relocated built form and increased mounding (which planting will then cover), this will result in the reduced visibility of built form compared to the notified situation (as commented on by the initial BM report) and as compared to the first amended situation (as commented on by the BM peer review).
- 30 For completeness, I have also reviewed the revised planting due to relocation of the workshop and consider it to be appropriate. The cross sections continue to demonstrate that mitigation will be achieved over the 3-year period, achieving mitigation at the viewpoints discussed above.
- 31 The location from which most visual effects will be perceived is a part of the lake surface and lake edge to the northeast of the proposed homestead. Observers that gain these views are well separated from any boat ramp or easily accessible location. They are likely to be few in number and will need to have deliberately travelled to a vicinity that is obviously improved farmland adjacent to an operational farm base area. From the relevant part of the lake surface, the buildings of Richmond Station on the eastern side of the lake, close to the lake edge, can already be readily seen. If the proposal proceeds, I consider that in practical terms, this adverse visual effect will be experienced by very few people and will be of a moderate-low degree before planting gains some growth (approximately 3 years) and be of a low degree after that
- 32 Apart from as experienced from those areas discussed above, adverse visual effects of the proposal will be minimal.
- 33 Regarding the reduction of the degree of effects over time, as planting establishes, the BM peer review sets out that the reduction in degree (as per the BM peer review column in the above table) will occur once planting

reaches a height of 2.5 to 3m⁸. I agree and note that Mr Baxter's evidence is that this will take approximately 3 years of growth. Again, the findings of the BM peer review regarding the degree of visual effects do not take account of the latest amendments to the proposal.

EFFECTS ON LANDSCAPE CHARACTER AND VALUES

- 34 "A landscape effect is an outcome for a landscape value. Change itself is not an effect: landscapes change constantly. It is the implications of change for a landscape's values that is the effect. Effects on landscape values are assessed against the existing environment and the relevant statutory provisions. Provisions often anticipate change and certain outcomes for landscape values.⁹"
- 35 The existing landscape character and values are discussed in detail in the V+E Report and are summarised above. The location of the proposed homestead is part of the improved and irrigated home paddocks area of this high country station and is close to (but not within) the station's FBA. The Godley Peaks FBA does not extend into the LPA. At its closest, the FBA is approximately 450m from the LPA.
- 36 However, many of the FBAs of the Mackenzie Basin have been configured so as to sit within the LPAs. One example is the Richmond Station FBA, directly across Lake Tekapo from Godley Peaks, that extends right down to the lake edge. There is some sense in this in that it is reflective of historic settlement patterns, with farm homestead dwellings and associated infrastructure logically being placed on fan or rolling terrace topography, adjacent to lakeside tracks/roads. In general terms, this means that farm dwellings on relatively flat lakeside topography per se are not something that is out-of-place or degrading in terms of landscape character, particularly if they are close to home paddocks and other farm infrastructure.
- 37 The V+E Report considers the particular design and configuration of the proposed homestead buildings in relation to NFL-SCHED3 of the E-Plan. The evidence of Mr Whittaker is important in explaining the design, the motivations behind it, and its appropriateness. In short, the architecture of the proposed buildings follows a high-country farming vernacular, reflective of historic occupation, while the landscape design of the area around the homestead uses locally-relevant native species to create a strongly

⁸ The BM peer review, paragraphs 5.9 and 5.16.

⁹ TTatM, paragraphs 6.01 to 6.06.

vegetated setting for the buildings. Additionally, access and fencing have been configured to retain as much useful, productive pasture in the vicinity of the dwelling as possible. The homestead will sit amongst functional paddocks that will be worked seasonally.

38 Separate from the proposed homestead, the outcomes of the FBP will bring recognisable change to landscape character and values. The evidence of Mr Davis is important to this issue, noting that the objective of the FBP is to protect and enhance the biodiversity values of the property. As a result of this aspect of the proposal, the station will continue to be managed as a productive farming operation but this will incorporate considerable measures, work and effort in an ongoing, year-on-year manner to increase vegetative natural character and habitat in a compounding way as growth and natural succession continues. Over time, this will restore native ecosystems and habitats and reverse past modifications and depletions of native biodiversity, moving the station as a whole (or significant areas of it) towards the more natural end of the spectrum of natural character.

39 As cited in my paragraph 15 above, the relevant policies recognise that the lakes, their margins and their settings (collectively, the LPAs) are significant in achieving the required protection and enhancement of the Mackenzie Basin ONL¹⁰. While no activities or changes are proposed in the lake or its margin, the homestead buildings, native plantings and some parts of the FBP elements are within the LPA (i.e. within the setting of the lake). As set out in the V+E Report, the homestead will be an element of human modification and occupation (i.e. a non-natural element). The biodiversity improvements that will result from the FBP will ongoingly improve natural character.

40 The potential adverse effects on landscape character and values that will result from the homestead buildings will be mitigated by the following factors:

40.1 The relevant area of lakeside land is not currently a part of the Mackenzie Basin that is of a particularly high natural character. It has been relatively intensively farmed, improved pasture for many decades and includes associated improvements.

40.2 The form and external appearance of the buildings have been designed so as to reflect their setting and are not contradictory to

¹⁰ E-Plan Objective NFL-02 and Policy NFL-P5.

their context. Strong areas of native vegetation will surround the dwelling and workshop buildings.

- 40.3 The use of the buildings is for the owners of Godley Peaks Station. The homestead will be inextricably linked to the ongoing farming management of the station and to the ongoing implementation of the FBP.
- 40.4 In relation to the characteristics that define the Te Manahuna/the Mackenzie Basin (as listed in ODP Objective 3B and E-Plan Objective NFL-02), the vicinity of the proposed buildings is not open to a broad viewing audience and does not comprise of tussock grasslands. These important aspects of Te Manahuna/the Mackenzie Basin's landscape character will not be affected.
- 40.5 The adoption of the proposed covenant restriction area forms an effective control over 'sporadic' growth and potential adverse cumulative over time (discussed further below).
- 41 The above commentary summarises the V+E report as it relates to effects on landscape character and values. This is essentially agreed upon by the BM peer review (paragraphs 5.23 to 5.31); however the BM peer review opines that the introduction of a noticeable man-made element will reduce natural character in a location that is currently open and not contained by landform (paragraphs 5.19 to 5.21). I essentially agree, as set out in the V+E report paragraph 105 and 109. While the site is open in terms of landform and vegetation, it does not particularly contribute to the widely experienced openness of the Mackenzie Basin that is appreciated to the south of Tekapo, i.e. the vast horizontal open space that defines the Mackenzie. Ultimately, the V+E report and the BM peer review agree that in terms of landscape and natural character effects, the proposed planting and the ecological restoration associated with the FBP "would balance the adverse effects associated with structures in the vicinity of Lake Tekapo, given that the building site is located in an ecologically more modified part of the station and set back/ elevated from the lake margin"¹¹. I also emphasise that when considering lake margins, the BM peer review appears to adopt the same interpretation as me, that the homestead is set back/elevated from lake margins. This is how I consider NFL-P5.2 should be interpreted.

¹¹ BM peer review, paragraph 5.22.

CUMULATIVE EFFECTS

- 42 The BM peer review notes that the number and size of proposed buildings will collectively bring a cumulative effect. It notes that the amendments made in response to the initial BM report would mean that this effect is of a low-moderate degree¹². The subsequent amendments, particularly the moving of the workshop building so as to separate and out-of-sight in relation to the other buildings, further reduce any effect of this sort, in my consideration.
- 43 The BM report sets out that the development potential of the existing FBA will still be available to the landowner if the current proposal proceeds and notes that the effects of that enabled FBA development could combine with the effects of the current proposal to create a cumulative effect. I agree that is potentially an issue that may have arisen in the future. In relation to this, the applicant has adopted the remedy that is recommended by the BM report; that built form is prohibited over an identified part of the existing FBA that includes more elevated land. The prohibition (by way of covenant) equates to the surrendering of significant enabled development over 12.7ha of elevated land that is visible from Godley Peaks Road and from the lake surface.

ISSUES RAISED BY THE SUBMISSIONS

- 44 Some of the submissions raise issues relating to landscape and visual effects. Other witnesses will address some points raised regarding planning, glare and dark sky issues.
- 45 Very largely, the landscape issues raised by submissions have been addressed in the V+E report, the BM peer review and this evidence. Obviously, the submissions relate to the proposal as notified, and the various amendments that have since been made alleviate the concerns stated in the submissions. Without labouring the points, I make the following summary comments:
- 45.1 As set out by Mr Baxter and Prof Boyle, the wintergarden building and the workshop building are now well hidden. Mr Burgess has reassessed the proposal in relation to glint/glare and considers the effects to be less than minor.
- 45.2 I agree with the point made by the BM peer review that the main visual effects of the proposed buildings “arise when viewed from the

¹² Ibid, paragraph 5.32.

surface of Lake Tekapo and the lake shore to the north and north-east of the Site, located within the bay. The views from the eastern side of Lake Tekapo (Lilybank Road, Te Araroa Trail, Two Thumb Range, etc) would in my opinion be affected to a low degree following construction and very low once vegetation establishes around the built form, given the viewing distance of around 5km.”¹³ This point is now even more valid since the movement of the workshop building.

- 45.3 The area of the FBA over which a covenant prohibiting buildings is now proposed currently provides for built development that would be elevated and visible from Godley Peaks Road, from the surface of the lake and from the eastern side of the lake.

CONCLUSION

- 46 Since the time of notification and the V+E report, a number of amendments have been made to the application in order to respond to issues that have been raised. The proposal now accords with the recommendations of the BM peer review. Compared to the notified situation, the most relevant amendments have involved lowering the wintergarden and workshop buildings, moving the workshop building south by 45m, significantly increasing mounding and planting around the buildings such that they are all more screened (with the workshop and wintergarden being very significantly screened), and prohibiting buildings from a 12.7ha area of the existing FBA that currently enables buildings that would be elevated and readily visible.
- 47 The amended proposal will have some adverse visual effects that will range up to being of a low-moderate degree in the short term. These low-moderate effects will be able to be experienced from part of the lake surface and edge to the northeast of the location of the buildings. This is a location in which potential observers are likely to be very few in number. In the medium term (after approximately 3 years of plant growth) these effects will reduce to being of a low degree at most.
- 48 In relation to landscape character and values, the home paddocks area of the station on which the homestead buildings are proposed is not a part of the Mackenzie Basin that is of a particularly high natural character. The buildings are of a traditional rural vernacular, are inextricably linked to the management of Godley Peaks Station and are strongly surrounded by broad areas of

¹³ Ibid, paragraph 5.6.

proposed native vegetation. The proposed FBP will improve natural character within the station in a compounding way over future years.

- 49 In an overall assessment regarding landscape and visual issues, I consider that the proposal is appropriate and will enable the continued protection of the Te Manahuna / Mackenzie Basin ONL.

Dated: 16 March 2026

.....

Ben Espie