

Upper Clutha Environmental Society

Proposed District Plan-Landscape Lines

Evidence of Julian Haworth

1. Nature of Evidence

1. This evidence is written by Julian Haworth, secretary/treasurer of the Upper Clutha Environmental Society.
2. I am giving this evidence on behalf of Upper Clutha Environment Society. I express both the opinions of the wider Society and my own opinions on resource management issues where appropriate. My evidence involves matters of fact.
3. I am aware that Council ordinarily requires witnesses who express opinions to be qualified as experts. While I acknowledge that I have no formal planning or landscape qualifications, I have lived in the Upper Clutha for twenty seven years. I have sixteen years experience of the visitor industry in the Upper Clutha having owned and run my own accommodation business in Wanaka.
4. I have a degree in Business Studies and successfully completed the exams of the Chartered Institute of Management Accountants in the UK in 1979. I worked professionally as an accountant for ten years.
5. I have sixteen years practical knowledge of the implementation of the QLDC's Operative District Plan (ODP). I have been involved in preparing and presenting submissions and evidence on a number of variations and plan changes and on more than hundred subdivision and/or land use resource consent applications in the Queenstown Lakes District.
6. I have given evidence at a number of Environment Court hearings over the last twenty years and I am familiar with the Court's decisions following from these hearings, including decisions that wrote and/or modified the District Plan.
7. I believe that over the last twenty two years on the committee of the Society I have gained sufficient expert knowledge on resource management, planning and landscape issues to be able to express an opinion that will be useful and can be given weight to on matters pertaining to the District Plan review.
8. My belief is based on a combination of extensive local and background knowledge, knowledge of the local landscape, familiarity with the ODP (especially the rural sections) and its relationship with the Resource Management Act, and active involvement in resource management processes. My expertise has been acknowledged in the Environment Court.
9. I have read the Code of Conduct contained in the Court's practice note and I have complied with this in preparing this evidence.
10. I have not omitted to consider material facts known to me that would alter or detract from my opinions expressed in this evidence.
11. I have read most of the evidence put forward by Council in relation to the rural sections of the Proposed District Plan (PDP) and some of the submissions put forward by other submitters.

2. Haworth and Lucas Evidence

12. The Society submitted evidence (my own) to the Chapter 21 Rural District Plan hearing. The Society also instructed Diane Lucas to submit expert landscape architect evidence at the Chapter 21 Rural hearing. This was because there is specific reference to the Landscape Categorisation Lines in Chapter 21. Council also submitted some evidence on Landscape Categorisation Lines (through landscape architect Dr. Read) at those hearings.
13. The chairman of the Hearing Panel at the Chapter 21 Rural hearing requested that the Society re-submit the Haworth and Lucas Landscape Lines evidence to a separate hearing dealing with Mapping and Landscape Lines in 2017.
14. The evidence below is the Haworth evidence; this has been rewritten, partly to clarify the earlier evidence and also to reflect the evidence put forward for this hearing. This includes comments on the specific mapping of areas.
15. The text of Ms. Lucas's evidence (including two appendices) is resubmitted unchanged. It should be noted that only paragraph 10 and paragraphs 61-67 of the Lucas evidence are directly related to the Landscape Lines issue, the rest relates to Chapter 6 and 21 issues.
16. However, it is relevant that in this non-Landscape Lines evidence Ms. Lucas castigates the changes made to the rural objectives, policies, assessment matters and rules in the PDP compared with those in the ODP. It is the position of the Landscape Lines that determines which objectives, policies assessment matters are applied (ONL/ONF or Rural Landscape).
17. It is important to note that while this evidence is given at the Upper Clutha Mapping hearing, *much of this evidence it is relevant to and applicable to the entire Queenstown Lakes District Rural Zone in particular the Queenstown Mapping hearings commencing soon.*

3. Summary of the Society's Position on Landscape Categorisation Lines

1. Retain in the PDP the Landscape Categorisation Lines delineated by the Court in the ODP
2. Include in the PDP the publicly notified Landscape Categorisation Lines as dotted lines but only as guidelines, except in vicinities where the Society will present landscape evidence, that is:
 - Waterfall Hill/Ruby Island Road
 - Dublin Bay/Mount Brown
 - Other locations depending on future assessments by Ms. Lucas¹

4. Landscape Lines

18. The PDP proposes to include definitive Landscape Lines as described in policies 3.2.5.1.1 and 3.2.5.2.1:

3.2.5.1.1 Identify the district's ONLs and ONFs on the District Plan maps, and protect them from the adverse effects of subdivision and development.

3.2.5.2.1 Identify the district's Rural Landscape Classification on the district plan maps, and minimise the effects of subdivision, use and development on these landscapes.
19. The S.32 Strategic Direction report states²:

¹ Ms. Lucas has so far only assessed the Waterfall Hill and Dublin Bay vicinities. Given the Society's position that the Read/Steven Landscape Lines are not reliable, other areas may be assessed should the Society appeal the PDP

“Fundamentally, however, the landscape provisions in the ODP are considered to function well. However, the District Plan review does propose to make some changes, and in particular provide a degree of greater definition and certainty by mapping landscape lines.”

20. I accept that some uncertainty is created by the case by case approach to landscape categorisation in the ODP as opposed to having mapped Landscape Lines in the plan. Much of this uncertainty can be alleviated by including the publicly notified Landscape Categorisation Lines as dotted lines where they are guidelines.
21. The delineation of the Landscape Lines in the Rural Zone between ONL/ONF and Rural Landscape is fundamental to managing the landscape resource in both the ODP and the PDP because this process defines the objectives, policies, assessment matters and rules that apply to rural subdivision and/or development.
22. In addressing this issue I have read the evidence of landscape architect Diane Lucas who has been commissioned by the Society to give evidence on the Landscape Lines issue. Ms. Lucas says³:

“some of the ONL-RLC delineation in the Upper Clutha I assess as not being adequate.”

23. In her evidence she describes and questions two Landscape Line locations at Waterfall Hill and Dublin Bay. Her conclusions on these two areas brings into question the veracity of the PDP Landscape Lines throughout the whole district. At the very least the Landscape Lines are contentious. The imposition of contentious Landscape Lines as proposed in the PDP is untenable and does not represent good resource management practice.
24. If the Landscape Lines are dubious, and in some cases wrong, a great deal of subdivision and development will be allowed in landscapes where this is inappropriate. This has the potential to be a major cost to the community in terms of adverse landscape effects.
25. A specific example of a contentious Landscape Line vicinity is along the western shoreline of Lake Wanaka, the Rippon Vineyard/Waterfall Hill/Ruby Island Road area⁴. Dr. Read admits that “the location of this boundary is highly problematic”⁵. The PDP Landscape Line is drawn to include a sliver of Kanuka on the lakeshore as ONL but not to include Waterfall Hill which is a significant topographical and geomorphological feature with considerable landscape value (see photo in Appendix B also used by Ms. Lucas in her evidence and Appendix C). The PDP categorisation of this area as Rural Landscape creates a tongue of Rural Landscape surrounded on three sides by Outstanding Natural Landscape (see the map in Appendix A). From my experience of reading many landscape assessments I suggest that most landscape architects would find this odd. The “tongue” would be regarded as a part of the ONL surrounding it on three sides as is the case further west down Mt. Aspiring Road Ms. Lucas supports this conclusion in her evidence where she says⁶:

“The inclusion in the ONL of adequate deposition lands south of Waterfall Creek is important to this interface, including Waterfall Hill and the channel and fan surfaces that surround it.”

² Middle of page 10

³ Paragraph 10

⁴ Ms. Lucas discusses the LL here on pages 13-15 of her evidence

⁵ Report to QLDC on Appropriate Landscape Categorisation paragraph 3.4.2

⁶ Lucas evidence Page 15

26. Ms. Lucas's landscape evidence also analyses the proposed Landscape Line in the Dublin Bay area. Again Ms. Lucas' analysis results in a Landscape Line that differs significantly from that proposed in the PDP. She says (my brackets):

"...the sprawling deposition of the Maungawera Fan cueing to a former glacial era is now only fed by the diminutive Quartz Creek and Rods Creek. Dr Read and Ms Steven have excluded this important landform [from outstanding natural landscape]."

27. I question the statement in the PDP Part 6.1 that says (my underline):

"Landscapes have been categorised to provide certainty of their importance to the District"

28. This will not be the case if the Landscape Lines in the plan are not credible. I have studied the Upper Clutha Basin PDP Landscape Lines background reports prepared by landscape architects Dr. Marion Read and Anne Steven⁷; the information in these reports does not give me confidence that credible Landscape Lines have been arrived at in all cases. The reports approach is broad-brush; the two landscape architects have come up with Landscape Lines over vast areas and very often disagreed.

29. Dr. Read's methodology in defining the Landscape Lines is suspect. The Crosshill Farm decision⁸ at Dublin Bay confirmed that even though where vicinities contained domestication in the form of a significant number of residences they could still be categorised as ONL due to geomorphological and other factors. The Environment Court discussed how to define naturalness in C80/1999⁹ where it held;

"The word "natural" does not necessarily equate with the word pristine..."

30. The Court held that there is a "spectrum of naturalness"¹⁰ and listed the following criteria assessing naturalness:

- *"The physical landform and relief*
- *The landscape being uncluttered by structures and/or obvious human influence*
- *The presence of water (lake, river, sea)*
- *The vegetation (especially native vegetation) and other ecological patterns*

The absence or compromised presence of one or more of these criteria does not mean that the landscape is non-natural, just that it is less natural. There is a spectrum of naturalness from a pristine natural landscape to a cityscape."

31. It was the influence of three out of four factors listed that enabled the Court to categorise the Dublin Bay/Mount Brown area ONL despite the presence of a significant number of residences. This is likely to be true of other areas in the District.

32. There is a consistent theme in the Dr. Read report¹¹ that where development, especially residential development, has taken place that this changes landscape character and so changes the categorisation from ONL to Rural Landscape

⁷ Dr. Read's Report to QLDC on Appropriate Landscape Categorisation dated 1 April 2014 and Ms. Steven's "Peer Review Landscape Assessment" of this report dated June 2014

⁸ C114/2007 UCES v. Crosshill Farm Ltd.

⁹ C180/1999 Paragraph 88

¹⁰ C180/1999 Paragraph 89

¹¹ Report to QLDC on appropriate landscape categorisation

Category. Mt. Iron (page 15) is an example; other examples are the mouth of the Cardrona Valley and the Rural Lifestyle zoning along Mt. Barker Road on the lower Pisa Range. The approach is also flawed because it incentivizes landowners to develop and domesticate ONL so that it is recategorised as Rural Landscape.

33. Ms. Steven lists¹² a whole series of areas where she does not concur with the Landscape Lines categorisations of Dr. Read. The fact that, having read Ms. Steven's report, Dr. Read comes up with composite Landscape Lines in the notified PDP maps based on one or other of the Landscape Lines proposed by her or Ms. Steven does not alter the fact that there are major differences in opinion between these two landscape architects.
34. Ms. Steven's Peer Review of Landscape Assessment report has 12 maps of the Upper Clutha attached, starting with "Waterfall Creek" and ending with "Mt. Barker-Hillend". These maps show considerable differences between Dr. Read's ONL Landscape Line and Ms. Steven's ONL Landscape Line. Differences are either significant or huge in the maps entitled "Maungawera Valley Dublin Bay", "Albert Town Area", "Hospital Creek", the "Hawea River Area", the "Clutha River Corridor" "Glenfoyle", "Pisa Range-Luggate". There are also smaller but important differences in the Landscape Lines on the other maps. The Landscape Lines included in the PDP are simply an amalgam of two often disagreeing landscape architects.
35. These differences are crucial. In the Upper Clutha alone dozens of landowners would be affected by the differences between the Mead and Steven Landscape Lines, and this is only in the Upper Clutha; this situation will be magnified many times across the district.
36. Ms. Mellsop in her landscape evidence¹³ states:

"...as there has been general agreement amongst landscape professionals and amongst the public about the identity of these landscapes. In the case of the Upper Clutha, this general agreement is evidenced by the general lack of PDP submissions seeking removal or addition of ONFs or ONLs."
37. This statement ignores the wide scale differences in landscape categorisation in the Upper Clutha between Dr. Read and Ms. Steven. (Presumably such differences are also found in other parts of the District). It also ignores the Society's submissions and evidence questioning the veracity of the Landscape Categorisation Lines and seeking that all of the Landscape Lines in the District are decided by the Court.
38. Later in her evidence Ms. Mellsop states¹⁴:

"While there are differences of opinion amongst the landscape architects who have assessed or reviewed the landscape boundaries – Dr Read, Ms Steven, Mr. Smith and myself – there is also considerable agreement."
39. This is the problem. Ms. Mellsop is correct that there is considerable agreement among the landscape architects about vast swathes of the landscape. But the problem is in the areas where there is dispute as to where the outstanding natural landscape ends, and here there is much less agreement among landscape architects. This is illustrated by the many and crucial Read/Steven differences. Ms. Mellsop accepts that four different landscape architect have difficulty agreeing.
40. Under the existing case by case approach the Environment Court has successfully identified Landscape Lines in a number of contentious parts of the Upper Clutha

¹² Steven Peer Review of Landscape Assessment June 2014 page 29

¹³ Mellsop Landscape evidence 17th March 2017 paragraph 4.4

¹⁴ Mellsop Landscape evidence 17th March 2017 paragraph 5.8

and in other parts of the district. In my opinion by the time the district plan comes up for further review in a further 10-15 years time almost all of the contentious Landscape Lines will have been carefully identified under this process. I note that Dr Read says in her S.42A Strategic Direction evidence¹⁵:

".....the ONLs and ONFs of the District had been identified by numbers of landscape professionals and many tested in the Environment Court, that they had been appropriately identified."

41. Dr. Read accepts that under the existing approach many ONL/ONF Landscape Lines have been "identified by numbers of landscape professionals." and "tested" in Court. The impression given is that the case by case approach is working.

42. The S.32 Landscape Evaluation Report says ¹⁶:

"It is inefficient to continue with the case-by-case classification of landscape categories"

43. While I understand and have some sympathy with the arguments in favour of trying to identify all of the Landscape Lines now, I believe, on the basis of the Landscape Lines information attached to the PDP, that this approach is inefficient because it is flawed. The current approach is more efficient because it results in lines the community can have confidence in.

44. A minute from the Chairman of the Hearing Panel states¹⁷:

"...based on the submissions lodged, that some submitters will mount substantial cases in support of the changes sought. We are expecting several weeks of our time will be required to hear all of these submissions."

45. Similarly the landscape architect's s.42A evidence to the Landscape hearing stated¹⁸:

"I understand there are a large number of submissions regarding the locations of the boundaries identified within the PDP and I anticipate that the consideration of these submissions will be subject to technical evidence in later hearings."

46. And in the Upper Clutha Mapping Strategic Overview and Common Themes Report¹⁹:

"116 rezoning requests have been received and 357 submissions or further submissions have been received on the Upper Clutha area planning maps."

47. I assume this refers to rezoning *and* changes to landscape categorisation. I am not the least bit surprised by the number of submissions disputing the landscape categorisations and warned in my earlier evidence that this situation was likely to eventuate. Many of the Landscape Lines identified on maps in the PDP are likely to become the subject of appeals.

48. As evinced in Council's evidence to this hearing, the "substantial cases in support of changes sought" almost all involve submitters arguing that vicinities should be categorised as Rural Landscape rather than ONL/ONF because this facilitates subdivision and/or development. It would be a vastly expensive, not to say

¹⁵ Paragraph 3.3(b)

¹⁶ Page 24

¹⁷ February 7th 2017

¹⁸ Paragraph 6.5

¹⁹ Craig Barr 17th March 2017 page 5

Herculean, task for any group (such as UCES) or person to submit opposing evidence on each of the landscape vicinities involved; this simply will not happen²⁰. This has resulted in a one-sided process involving several weeks of evidence (on both sides of the hill) where Landscape Lines that favour subdivision and/or development may eventuate, though I do note that most of the rezoning requests are recommended to be rejected by the planner.

49. Given the faults in the process just described an obvious and logical course of action is to retain the Read/Steven publicly notified lines unchanged, but include them as dotted-lines and only as guidelines. I do not support any changes to the notified Landscape Lines proposed by self-serving submissions to this hearing.
50. In my experience, compared with a Council hearing, the Court carries out a much more rigorous examination of landscape evidence through cross-examination of at least three landscape architects in the Court. Importantly, not just the landowners point of view but points of view from all sides are heard.
51. The process involves a fine-grained analysis of landscape in a particular vicinity and so leads, in the experience of the Society, to the identification of objective Landscape Lines. It makes no sense to definitively tie the Council and Court to the dubious Landscape Lines shown in the Proposed District Plan.
52. Ms. Mellsop says in her evidence²¹:

“The landscape boundaries report and associated reviews have been undertaken on a district-wide basis rather than addressing only the landscape context of a specific resource consent application.”
53. Here Ms. Mellsop is either being disingenuous or she does not understand the process undertaken in the Court. When a “specific resource consent application” is assessed for Landscape Line consideration in the Court the wider vicinity (usually a very wide vicinity) is always considered and this is done in a fine-grained manner by reference to three briefs of landscape architect evidence and cross examination. The “district-wide basis” broad brush approach is considerably less rigorous in comparison.
54. Vast areas of the district are accepted unchallenged as being categorised as ONL/ONF. Ms. Steven says in her Peer Review of Landscape Assessment report²²:

“...the fundamental factors determining outstanding status are the aesthetic factors. This is consistent with the view that ONLs should be obvious to most people and should not require any specialist knowledge.”
55. Many of the contentious parts of the Upper Clutha have had Landscape Lines determined by the Environment Court as can be seen in Appendix 8B in the ODP. The same is true of other parts of the District as can be seen in ODP Appendix 8A.
56. Invariably the landscape evidence presented in the Court results in both the subject site and the wider vicinity around the subject site becoming categorised. Examples are the Crosshill Farm²³ and Parkins Bay²⁴ decisions.
57. My experience of a number of hearings where the Landscape Lines have been delineated by the Court has been that the Court process, especially the cross

²⁰ The same situation was encountered in the ODP hearings of 1998-2001

²¹ Mellsop Landscape evidence 17th March 2017 paragraph 5.7

²² Page 12

²³ C114/2007 UCES v. QLDC (Crosshill Farm Limited applicants)

²⁴ [2010] UCES and Others v. QLDC (Parkins Bay Preserve Limited applicants)

examination of landscape architects, is rigorous. This results in Landscape Lines that the community can have confidence in. There is really no substitute for this process.

58. In relation to existing Landscape Lines in the ODP Dr. Marion Read states in her landscape classification report²⁵:

“Some solid lines and features have been confirmed in the Upper Clutha Basin. This has not succeeded in removing levels of contention.....it may be appropriate to reconsider the location of some of these lines in the light of current conditions and with regard to the consideration which was given to their location in the first instance”

59. Reconsidering the existing lines in the ODP as suggested by Dr. Read makes no sense at all and is simply creating a rod for Council’s back. These lines have been delineated by the Court after presentation and cross-examination of extensive landscape evidence. I note both Dr. Read and Ms. Mellsop respectively support Landscape Lines delineated for Parkins Bay/Glendhu Bay and the Mt. Alpha Fan and rely on the Court decisions in support of such categorisations. One wonders what their opinion would have been without the Court’s detailed assessment.
60. The community can have limited confidence in the Landscape Lines as now shown in the PDP. The community can have even less faith in the Landscape Lines that will eventuate after many weeks of submissions by landowners that have caused them to be moved in their favour.
61. A pragmatic solution would be for the publicly notified Proposed District Plan Landscape Lines to be shown as dotted lines in the positions proposed on the PDP maps while the Landscape Lines shown in the Operative District Plan are retained as solid lines in the exact form they currently appear. The following text (amended slightly from that in the ODP) would be shown on the maps:

Boundary between two different landscape categories. The solid lines represent landscape categories determined by the Court and are not subject to change. The dotted lines have been determined under a broad-brush analysis as part of the District Plan process but have not yet been through a detailed analysis of specific physical circumstances of each site in the Environment Court to determine their exact location and so are not definitive. The dotted lines are purely indicative until their exact location has been determined through the Environment Court process.

62. The Court would be the ultimate arbiter of the Landscape Lines when an appeal against a resource consent application in a particular vicinity was made. At that point the Landscape Lines would become solid lines. The dotted lines would be in place as a useful guideline.

5. Specific Vicinities

63. A number of (largely self-serving) submissions have proposed changing landscape categorisations from outstanding natural landscape/outstanding natural feature to Rural Landscape²⁶. Many of these also request rezoning. I will comment on some of these.

5.1 Glendhu Bay/Parkins Bay Vicinity

²⁵ Page 3

²⁶ The Makarora Valley is an exception. I support the decrease in the RL zoning proposed here and wonder how it ever eventuated in the first place.

64. In its further submissions to the notified PDP the Society opposed in its entirety the submission of Submitter Number: 583 Glendhu Bay Trustees that requested the rezoning of Glendhu Station as Glendhu Station Zone.

65. I note this issue is discussed in Dr. Read's evidence, where it is concluded:

"...the consented development anticipated within Glendhu Station is subject to very strict controls including extensive covenants, detailed designs, and comprehensive environmental compensation. The special zone proposed to encompass the entirety of the Glendhu Bay Station would provide for significantly more development within the area, with diminished environmental compensation over that consented by the Environment Court. This would not be compatible with the objectives and policies of Chapter 6 of the PDP."

66. Glendhu Bay Trustees appear to be relying on the "Corridor Study" that supports, to some extent, development in this vicinity. This report, commissioned by the Glendhu Bay Trustees, is blatantly self-serving. I do not believe any weight should be attached to it. The natural landscape characteristics of the Glendhu Bay/Parkins Bay vicinity are highly cherished by the local community, and are a gateway to Mt. Aspiring National Park. They need to be protected by the District Plan Rural Zone provisions; widespread and inappropriate development is likely to eventuate from the rezoning proposed.

67. Dr. Read is correct where she says in her evidence (paragraph 6.12):

"The degree of liberalisation of future development that the proposed zone would provide is far and beyond, in my opinion, the ability of the landscape of the vicinity to absorb."

68. There are no indications at all in the three Parkins Bay decisions²⁷ that the Environment Court contemplated a rezoning of this vicinity. On the contrary the development that was granted was on the basis of very positive economic effects generated by an international golf course (the first Parkins Bay decision contains a cost-benefit analysis) and significant environmental compensation.

69. I support the planner's evidence conclusion²⁸:

"The PDP Rural zone is more appropriate than the Glendhu Station zone as requested by the submitter. This is because the Rural Zone more appropriately manages effects in this area when compared with the activities that would be allowed if the land was rezoned to be in the submitter's proposed Glendhu Station zone."

5.2 Criffel Station

70. In its submissions to the notified PDP the Society opposed in its entirety the submission of Submitter Number 820 Jeremy Bell investments Ltd. that requested the rezoning of land within Criffel Station as Rural Lifestyle Zone. The Society supports the area being zoned as Rural Zone as shown in the PDP. This is the appropriate zoning for this sensitive landscape.

71. In general the Society supports, with some caveats, the conclusion reached in the Mellsope evidence to this hearing, paragraph 8.72, where it says:

"In my view, while the rezoning area may have some capacity to absorb sensitively designed development that is screened from the wider basin by

²⁷ Decision No. [2010] NZEnvC432 and [2012] NZEnvC43 and [2012] NZEnvC79

²⁸ Craig Barr Group 3 Rural 17th March 2017 page 51

landform, the proposed Rural Lifestyle zoning of the site would be inappropriate from a landscape perspective. I therefore oppose the rezonings sought by the submission.”

72. The Society doubts the capacity to absorb development in this area, as expressed above, but assuming the above conclusion is adopted, any such development will be the subject of a resource consent application in the Rural Zone.

5.3 Waterfall Hill/Ruby Island Road Area

Blennerhassett Family Trust (413) and RN Macassey, M G Valentine, L D Mills & Rippon Vineyard and Winery Co Limited (692) Submissions

73. The above submissions relate to the area south east of Ruby Island Road and seek that the Urban Growth Boundary is moved so that it runs along Ruby Island Road and that the area delineated in blue on the map on page 35 of the s.42A Urban Fringe report be rezoned Rural Lifestyle or Rural Residential.
74. While the Society did not make specific further submissions on the above submissions, it did make a submission supporting the current position of the Urban Growth Boundary and has submissions that relate to all of the District’s Landscape Categorisation Lines and has given earlier evidence and submissions at the District Plan hearings on the outstanding natural landscape/rural landscape boundary in this vicinity.
75. My evidence (above) and Ms. Lucas’s evidence support the inclusion of Waterfall Hill within outstanding natural landscape because of its high landscape values-this is the area that roughly coincides with the area delineated on page 35 of the s.42A report and (again roughly) with the dotted outstanding natural landscape boundary shown in the ODP. My picture in Appendix B (also attached to Ms. Lucas’s evidence) and my Appendix C show Waterfall Hill’s open space values and the way it blends in with the surrounding outstanding natural landscape.
76. It follows that while I support the conclusions reached by the s.42A report not to move the Urban Growth Boundary and to retain the Rural Zone zoning in this area, I do not support the position of the outstanding natural landscape boundary as supported in the s.42A Urban Fringe report for the reasons given in this and Ms. Lucas’s evidence.
77. It goes without saying that I do not support either the Rural Residential or Rural Lifestyle zonings proposed by the submitters. The request for such a zoning is indicative of the landowner’s lack of respect for the importance of the natural values of this landscape to the wider community²⁹.

5.4 Mount Alpha Fan

78. Ms. Mellsop in her evidence supports including Mount Alpha Fan in outstanding natural landscape per the boundary decided by the Court and says:

“...the boundary in the ODP and in the notified PDP has been drawn roughly at the toe of the escarpment, which I consider is the most logical and defensible location.”

79. I support this opinion. However, for the reasons given by the Court decision (discussed and referenced in the Mellsop evidence) that decided the Alpha Fan landscape categorisation I cannot see any justification for the amendment to the

²⁹ The same can be said for the owners of Glen Dene Station where they propose to rezone areas beside Lake Hawea

outstanding natural landscape boundary referred to above, as suggested by Ms. Mellsop in paragraph 7.38, in order to exclude existing dwellings. Outstanding natural landscape status is not precluded simply by the presence of buildings. I oppose these so-called “minor alterations” to the publicly notified outstanding natural landscape boundary of Mount Alpha Fan.

5.5 Criffel Station

80. The Mellsop evidence, on the basis of submissions received from Lake McKay Station, supports removing knob A3KV from outstanding natural landscape. I can see no strong factual basis for this change and so oppose this and support the publicly notified categorisations.

5.6 Crosshill Farm

81. The Mellsop evidence, on the basis of submissions received from Crosshill farms Ltd., supports removal of a large area of meltwater channel and outwash terraces from outstanding natural landscape stating:

“I do not consider that the western wall of the Dublin Bay meltwater channel and the outwash terraces in the eastern part of the Crosshill Farms site are sufficiently rare, distinctive or unusually legible to be classified as ONF or ONL.”

82. Having recently viewed this area carefully from Mount Iron, I prefer the landscape evidence of the Read/Steven report that categorise this area as outstanding natural landscape on the publicly notified maps; the recategorisation is opposed.

5.7 Maungawera Valley

83. The Mellsop evidence supports removing a large part of the Maungawera Valley from the outstanding natural landscape category that was publicly notified on the basis of submissions made by (Mount Burke Station leaseholder) Tim Burdon (791) and Lakes Landcare (794).
84. This is a contentious area. Ms. Lucas’s evidence not only supports the retention of the area described above as outstanding natural landscape but also supports the highly sensitive and visible Mount Burke fan area that abuts Lake Wanaka at Dublin Bay being categorised as outstanding natural landscape. The change suggested by Ms. Mellsop is opposed.

6. Upper Clutha Mapping Strategic Overview and Common Themes Report

85. As part of this hearing stream Mr. Barr has submitted evidence in the form of an Upper Clutha Mapping Strategic Overview and Common Themes Report. Most of this report is irrelevant to the Society because it does not relate to the rural zone. I will comment on relevant elements.

86. In paragraph 7.4 the report states:

“The Strategic Directions of the PDP overall focuses future urban development within identified urban growth boundaries with urban zones that provide for urban growth to meet the needs of the District.”

87. There are many other references to the Strategic Direction chapter in other parts of the report. The rural objectives, policies, assessment matters and rules contained in the ODP are efficient in carrying out the functions described above and so I believe that these should be rolled over per the district plan structure described in my evidence given at the “Entire Plan” hearings and earlier hearings. I believe that the District Plan structure proposed in the PDP is inferior to that I have proposed in

that evidence, especially in terms of ease of use, focus and ability to control adverse effects of subdivision and development in the rural landscapes.

88. In paragraphs 19.7 to 19.9 the planner discusses the Society's position on landscape categorisation and says:

"A submission of a more strategic nature on the use of landscape boundaries in the PDP is that received from the Upper Clutha Environment Society (UCES) (145), who seek exclusion of the landscape categorisation boundaries in the PDP. The Upper Clutha Environmental Society considers that in many places the PDP landscape boundaries are not credible and prefers the current process under the ODP, that requires the assessment of what type of landscape a development site is located within on a case by case basis (ONF or ONL Wakatipu Basin, ONL District Wide, Visual Amenity landscape, Other Rural Landscape)."

"It is my view that from an overall planning perspective, and in particular in terms of effectively managing the District's highly valued landscape resource and providing certainty to the community of confirmed boundaries, that the identification of landscape lines are appropriate. I therefore recommend that this part of the UCES's submission is rejected."

89. The planner here ignores the Society's position where it has offered a practical and sensible compromise (explained in detail above and in my evidence to earlier hearing streams) where the district's existing Landscape Categorisation Lines decided by the Court are retained while the PDP publicly notified Landscape Categorisation Lines are dotted and treated as guidelines until confirmed by the Court. This is now the Society's preferred position, rather than leaving out the Read/Steven Landscape Lines.