

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL
HEARINGS PANEL**

UNDER The Resource Management Act 1991

IN THE MATTER of the Rezoning Hearing -Stream 12
(Upper Clutha Mapping)

AND
IN THE MATTER of submissions by Lake McKay Station Limited.

**Statement of Evidence of Michael Kelly on behalf of Lake McKay Station
Limited**

**Response to Council S42A Report on Submission 482,
in regard to ONL (Outstanding Natural Landscape) on Lake McKay Station.**



Opus International Consultants Ltd
Tarbert Buildings, 69 Tarbert Street
PO Box 273, Alexandra 9340
New Zealand

T: +64 3 440 2400
F: +64 3 440 2401
W: www.opus.co.nz

1. INTRODUCTION

- 1.1. My full name is Michael Robert Kelly. I am a Senior Planning Consultant employed by Opus International Consultants. My qualifications are a Masters of Applied Science degree in Resource Management from Lincoln University and a Bachelor of Science degree in Geology from Victoria University. I have twenty years experience in Planning work in New Zealand under the RMA(1991).
- 1.2. Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

2. PURPOSE

- 2.1. The purpose of this report is **a response to the S42A reports** from Council on the **Lake McKay Station submission 482**. The Section 42A Reports from Council that are referred to are:
 - a. Statement of Evidence of Craig Barr on behalf of QLDC – Strategic Overview and Common Themes – 17 March 2017.
 - b. Statement of Evidence of Craig Barr on behalf of QLDC –Group 3 Rural – 17 March 2017.
 - c. Statement of Evidence of Helen Juliet Mellsop on behalf of QLDC – Landscape – 17 March 2017.
- 2.2. Our response includes the following issues;
 - a. On Lake McKay Station there is a range of Landforms from valley floor to ice eroded terraces to foothills and mountains of the Pisa Range. The valley floor and terraces have been modified by farming practices and there are differing opinions as to whether they should be included as ONL.
 - b. Landscape Architect assessment on Outstanding Natural Landscapes are often subjective and varied.
 - c. When Rural zone land is defined as ONL it is severely restricted in changing to an alternative land use.

3. LANDSCAPE ASSESSMENT

- 3.1. It is our view that the proposed ONL on Lake McKay Stn is erroneous and onerous.
- 3.2. In this analysis we have not employed a landscape architect to present another determination of the ONL. Instead we provide an analysis and comparison of the Landscape assessments that have been carried out in recent times for the purpose of defining an ONL.

- 3.3. Submission 482 opposed the ONL line in the PDP where it crossed Lake McKay Station (LMS). The ONL classification in the PDP affects LMS in two main areas;
- a. On the terraces on the south side of Luggate and
 - b. The margin of the Clutha River on the terrace south of Wanaka Airport.
- 3.4. In regard to Area a. - the Landscape south of Luggate - It is generally agreed that there are 3 distinct landscape forms on the south side of the Upper Clutha Valley near Luggate being, the valley floor, the terraces, and the foothills that form the north end of the Pisa Range. (See Photo 1).



Photo 1: View of the Landscape to the south of Luggate: taken from SH8A on the opposite side of the valley.

- 3.5. The landscape studies that were commissioned by the QLDC for the purpose of defining the landscape forms and making recommendation on ONL for the PDP were;
 - a. Landscape Classification Study of the Queenstown Lakes District – Marion Read - March 2014;
 - b. Peer Review of Landscape Assessment; Outstanding Natural Landscape of the Upper Clutha Part of the Queenstown Lakes District – Anne Steven June 2014
 - c. QLDC Landscape categorisation Lines – Paul Smith – July 2015
- 3.6. These reports agreed on the landform types but did not uniformly agree on the boundary for the ONL. In the area south of Luggate Ms Read recommended that the ONL boundary should be at the foot of the terraces. Whereas Ms Steven considered that the terraces were a modified farming landscape and not ONL, and that the boundary of the ONL should be at the base of the foothills. Ms Steven’s ONL line was approximately along the 550m asl contour which was at the same level as the ONL in the neighbouring Central Otago District. The line then lowers to around 400m at the Luggate Creek Gorge and then rises again on Criffel Station to above the modified farm land. A plan from Ms Steven report depicting the different ONL lines is attached in Appendix 1 of this report along with the section of her report describing the landforms on the north end of the Pisa Range.
- 3.7. We consider that Ms Stevens definition of the landscape more accurately defines the natural landscape from the modified landscape and we support this version of the ONL rather than Ms Reads version.
- 3.8. Despite Ms Stevens review the PDP adopted Ms Reads’ definition of the ONL which runs along the boundary between the valley floor and the ice eroded terraces.
- 3.9. Our submission opposed the ONL along the valley floor. We agreed with Ms Steven in that the farmed land on the terraces was a modified farmed landscape (not a natural landscape) and that in our view the appropriate location for the ONL was above the terraces.
- 3.10. In our submission we included two plans that were annotated with our view of the location of ONL boundary line. Helen Mellsops Landscape Report for Council dated 17 March 2017 in a review of our submission notes that there is a discrepancy between the lines shown on the plans with one line at the approximate 550m asl and the other higher at 650masl. There was an error and the line was meant to follow the 550m contour on both plans.
- 3.11. To clarify this we confirm that in our view the ONL should be along the line of the boundary between the terraces and rising foothills of the Pisa Range, which on Lake McKay Station, is fairly uniformly along the 550m asl contour across Dead Horse Creek, Tin Hut Creek and the south branch of Luggate Creek. In our assessment the boundary then lowers to 450m asl where it crosses Luggate Creek gorge and then continues along this contour on Criffel Station, in a westerly direction, to the Cardrona River Valley.

- 3.12. Both Ms Read and Ms Steven's ONL include the Luggate Creek gorge and follow the line of the gorge upstream to the boundary with Criffel station. Ms Stevens line then continues up hill on the Pisa Range, to rise above the modified farm land on Criffel Station. However Ms Reads line continues along the base of the terrace at about the 400m asl contour. We consider that the line should continue along the boundary between the terrace and the rising slopes of the Pisa Range, which is at the 450m contour and is in-between the Steven ONL and Read ONL lines.
- 3.13. This boundary for the ONL was also recommended by Paul Smith in his Report to Council in July 2015.
- 3.14. The Report by Mr Smith was commissioned by Council for the purpose of better defining the ONL boundary at a few places around the Upper Clutha basin where there were discrepancies in defining the ONL. In particular at the base of the Pisa Range on Criffel Station. This report is referenced in the Stream 12 Council Bundle as CB71 and is also attached in Appendix 2 of this report.
- 3.15. In regard to the ONL on Lake Mckay Station a recommendation of Mr Smith's was to include the hill on the north side of the Luggate Creek Gorge as an ONL. This hill is labelled as A3KV on the Topographic maps. Neither the Steven or the Read assessments included this hill as ONL. However following the report from Mr Smith this hill was included as ONL when the PDP was notified.
- 3.16. In January 2017 for the purpose of the S42A Report the Council employed a different landscape architect (Helen Mellsop) to assess the landscape affects of the proposed "mapping" submissions on the PDP.
- 3.17. Ms Mellsop's Report is a Statement of Evidence on Landscape dated 17 March 2017. In her Evidence, Ms Mellsop generally agrees with the ONL on Lake McKay Station as it is notified in the PDP.
- 3.18. In regard to the disagreement on ONL lines between Read and Stevens, Ms Mellsop makes the following commentary –

- 5.2. *I note that Ms Anne Steven, in her peer review of Dr Read's landscape boundaries study [CB70], has stated that for a landscape to qualify as an ONL it must be determined to have at least a moderately high level of natural character. This has led her (in her peer review) to recommend exclusion of some areas from larger ONLs on the basis that they were not sufficiently natural. Ms Steven's recommended landscape boundaries are sought by some submitters. I disagree with the suggested requirement that an ONL must have a specified level of natural character. A landscape may be significantly modified by farming activities and pasture improvement but still be recognised as an ONL for other reasons (eg striking topography or cultural/associative values). I understand that this principle has been confirmed by the Environment Court in Upper Clutha Tracks Trust v Queenstown Lakes District Council (the Parkins Bay decision*
- 5.3 *Late in the process of PDP preparation, I understand that alternative landscape boundaries in the vicinity of Criffel Station and for the Glenfoyle escarpments in south-east Hawea were recommended by Mr Paul Smith, landscape architect, of Vivian and Espie Limited. These recommended changes were included in the notified PDP. I understand they were not reviewed by any other landscape architect.*

- 3.19. Later in Ms Mellso's report a review of the ONL on Criffel and Lake McKay Stations is carried out and a change to the ONL is recommended on the basis of a different interpretation of the Landscape. The following explanation is provided in Ms Mellso's report for the amendment of the ONL line to exclude the Knob A3KV.

8.33 At Criffel Station, the till and glacial outwash gravels at the base of the ranges have been eroded by subsequent fluvial action to form a terrace and escarpment system. From closer viewpoints on Mount Barker Road and Ballantyne Road the terraces are not highly visible and the vegetation-covered escarpments appear part of the mountain range behind (refer Photograph 7 below). From more distant elevated viewpoints the terraces are legible and it is clear that they form an extension of the terrace system that wraps around Knob A3KV (refer to Figure 5 and Photograph 8 below). This hill and a smaller conical hillock on the Criffel Station terrace consist of lateral moraine remnants over schist bedrock and are of a different landscape character to the mountains behind. I therefore recommended that the majority of Knob A3KV be excluded from the ONL.

- 3.20. The relevant photos and plans from Ms Mellso's Report are attached in Appendix 3.
- 3.21. Based on the interpretation in Ms Mellso's report to exclude Knob A3KV we consider that the same interpretation could be applied to the Mid-run area on Lake McKay Station (ie. the rounded hill forms of lateral moraine remnants over schist bedrock as described for A3KV are similar in form to the rounded hill mounds in the Mid run area.) Therefore the mid-run area could also be excluded from the ONL classification. The boundary for the ONL would then be further back and along the next boundary between landforms which is the 550m contour at the base of the foothills.
- 3.22. However the point to note here is that four landscape architects have assessed the landscape on Lake McKay Station and the line of the ONL has been amended for each one of the assessments.
- 3.23. The Assessments from these reports illustrates two things to us;
- a. This area is not easy to assess for landscape values.
 - b. Landscape architects have varying views on how to assess ONLs.
- 3.24. Given the varying interpretation of the land forms in this area it would make sense to leave this land out of an ONL classification and to establish the ONL boundary at the higher altitude along the foothills of the Pisa Range (along the 500m contour line) as this boundary appears to be accepted in all four assessment as an ONL.

4. THE ONL IS ONEROUS SO NEEDS TO BE APPLIED CAREFULLY.

- 4.1. Given this situation I move onto the third point of our submission:
- a. The classification of land as ONL, and the Policies in the PDP on ONLs, severely restrict the range of land uses that are possible for Rural land.
- 4.2. This is illustrated in Chapter 6 - Landscapes – in the wording for the Policies on development in ONL and the RLC landscapes as follows;

6.3.1.3 That subdivision and development proposals located within the Outstanding Natural Landscape, or an Outstanding Natural Feature, be assessed against the

assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.

6.3.1.4 That subdivision and development proposals located within the Rural Landscape be assessed against the assessment matters in provisions 21.7.2 and 21.7.3 because subdivision and development is inappropriate in many locations in these landscapes, meaning successful applications will be, on balance, consistent with the assessment matters.

- 4.3. The wording in Policy 6.3.1.3 creates a very high hurdle for any proposed development in an ONL area that involves a change in land use.
- 4.4. Although the Strategic direction of the Plan describes that the Landscape classification should not be overly restrictive on the continuation of farming in an ONL area. However there are rules in the PDP that restrict the development of a farm business even without changing the land use activity.
- 4.5. In Chapter 21 Rural - the Rules in Table 4 - 21.5.18. – the construction of a farm building in an ONL is restricted to less than 4m in height and less than 100m² in ground floor area in comparison to the RLC classification where the permitted activity for a shed is less than 5m in height and less than 300m² in area.
- 4.6. Again we are not disputing these Rules as it is agreed that it is reasonable to restrict the size of farm buildings in an ONL area. But what we are disputing is that once an area is classified as ONL then normal farm development is restricted so we need to be sure of the difference between a modified farm landscape and an Outstanding natural landscape.
- 4.7. For example on Lake McKay Station following the development of the irrigation on the Tin Hut Creek terrace area there are plans to construct sheds for storing winter feed. If this area is classified as ONL then the size of the sheds that can be constructed as a permitted activity are smaller than the usual economic size for a winter feed storage shed.
- 4.8. The Council S42 Reports have advised that they are reluctant to allow a change to Rural Residential/ Lifestyle zones in the terraces area on Lake McKay Station and have also advised that some sparse discrete residential development may be acceptable and would be better pursued by application for resource consent rather than a change of zone.
- 4.9. We contend that an application for a resource consent for a residential activity or a tourist activity (if it involves a building or a structure) will be virtually prohibitive in an area that is classified as ONL under the new Objectives and Policies in the PDP.
- 4.10. And therefore once a land area is classified as ONL then there is no flexibility in the future use for that land as it will only be feasible to carry on farming it.
- 4.11. For these reason we emphasise that it is necessary to be very clear about what is a ONL.
- 4.12. Further in areas like the terraces and the mid-run area on Lake McKay Station where there are differing opinions as to whether these landforms are ONL and where due to the lesser slope, undulating surface, and lower altitude it is possible to carry out discrete development that does not affect the landscape views then it would be fairer to leave the land classified as RLC.
- 4.13. In contrast to other land forms where there are steeper slopes and broad open faces in the land form, such as the foothills of the Pisa Range, where it would be difficult to carry out any development without it being visible from across the valley. These are generally the landscapes that everyone would agree are ONL and these should be the predominant landscapes that are classified as ONL

- 4.14. Determination of the classification of the landscape for any area under the 550m contour line on LMS should be left to determination when required on a case by case basis when a resource consent is applied for.

5. THE CLUTHA RIVER ONL

- 5.1. In our submission 482 we requested a change to the ONL boundary on the eastern end of the land owned by Lake McKay Station near the Clutha River. This is the irrigated land on the lower terrace at the south end of the Wanaka Airport.
- 5.2. At this location the ONL line recommended by Ms Steven was adopted by the PDP which is the line that runs along the foot of the terrace on which LMS has an existing centre Pivot irrigator.
- 5.3. Further east from this line is a broad terrace that is land owned by the Pittaways and has previously been farmed. Beyond this broad terrace is the Rekos Point conservation area (see the Plan attached to our submission entitled "Clutha River Corridor").
- 5.4. Ms Read placed the boundary of the ONL between the Pittaways land and the Conservation land and we agree with this location of the ONL as it a more definite boundary between modified farm land and natural landscape.
- 5.5. We note that Figure 4 in Ms Mellsops report showed our preferred boundary for the ONL extending into the Rekos Point conservation area which was not the case. Our submission only promoted adopting Ms Read's ONL boundary at this location.

Appendix 1

Excerpts of Report:

Peer Review of Landscape Assessment; Outstanding Natural
Landscape of the Upper Clutha Part of the Queenstown Lakes
District – Anne Steven June 2014

North End of Pisa and Criffel Range (Luggate Area) (see Plans Pisa Range-Luggate and Mt Barker-Hillend)

Marion has adopted the Environment Court ruling in the Bald Developments case C055/2009 which decided the site (at least) was outstanding pastoral landscape. Evidence given by Di Lucas was that all the landscape from the base of the hill to the range summit is ONL.

My opinion is that the middle lands of ice-scoured bedrock and moraine veneer is not sufficiently natural. Like the northeast side of Mt Brown, there is a balance of very modified cultivated farmland in paddocks with unnatural patterns of vegetation clearance lying on the smoother moraine veneer lands between very natural incised wooded gorges. This country is not as impressive as other parts and is not a major part of the backdrop generally seen from the basin floor areas to the north. The rock bluffs and Kanuka woodlands around the base of the hills, next to SH6, are very natural with high visual appeal however.

I assess the lower margin of rocky outcrops and kanuka woodland to be an area of ONL, between the district boundary and Luggate township; and, generally, the steeper slopes, bluffs and mountain lands above the farmed plateau to be ONL. This is consistent with the assessment in the Central Otago district. The hill slopes of Criffel Station closer to Mt Barker are considered too modified and scarred by tracking and fence lines to be able to be part of the ONL, being contiguous with modified lands below. Their topography and vegetation is also rather non-descript. The lumpier ice scoured rocky terrain with a greater coverage of Kanuka woodland between the impressive Luggate Creek gorge and Alice Burn is considered natural and striking enough to be ONL.



View of Pisa Range between south boundary and Alice Burn from Kane Road, showing ONL line



Pisa Range viewed from Watkins Road showing assessed ONL line (June 2014)

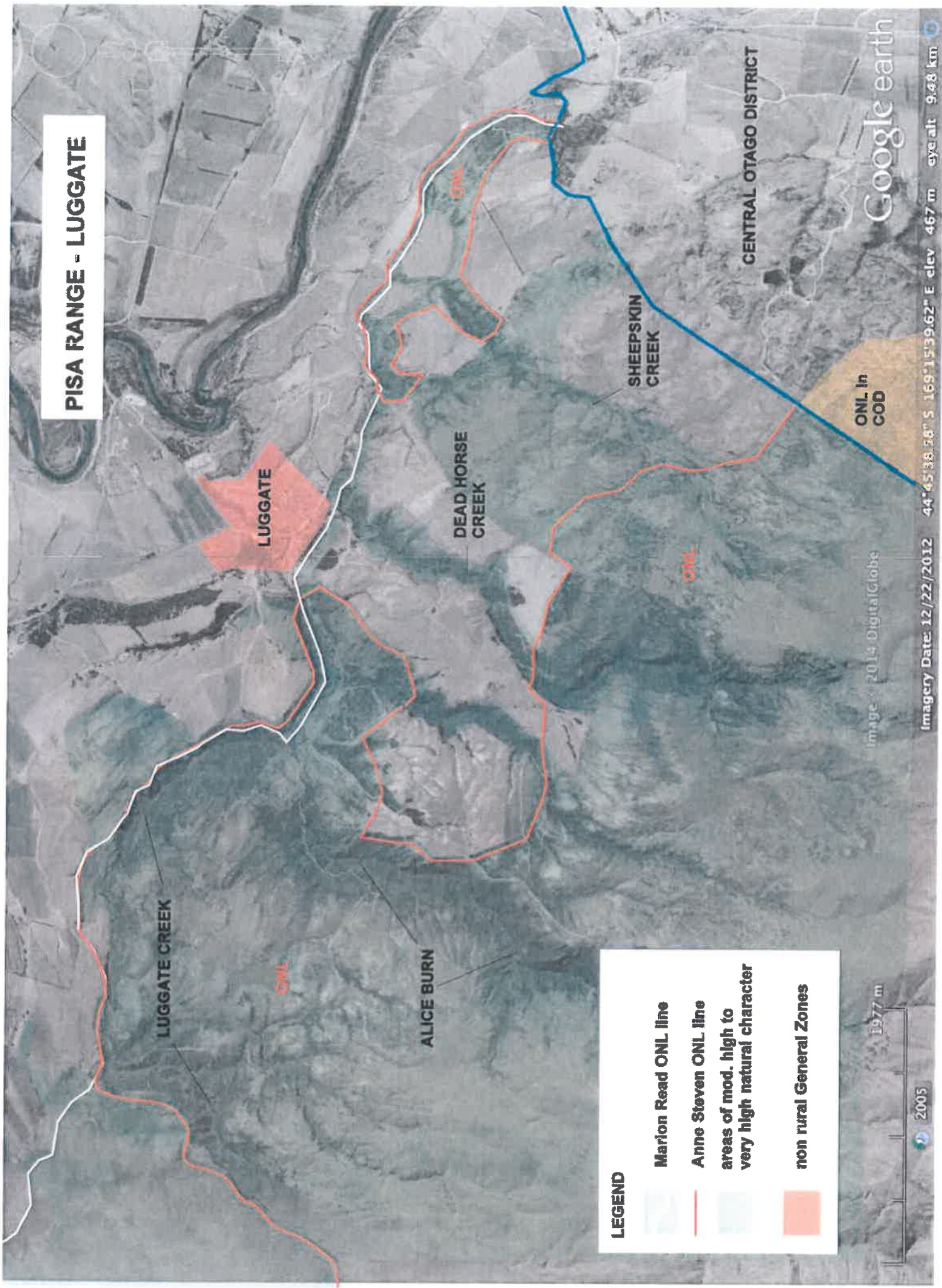


Pisa and Criffel Ranges viewed from Ballyntyne Road showing assessed ONL line (June 2014)







Pisa and Criffel Range viewed from Dublin Bay Road showing assessed ONL line (June 2014)

PISA RANGE - LUGGATE

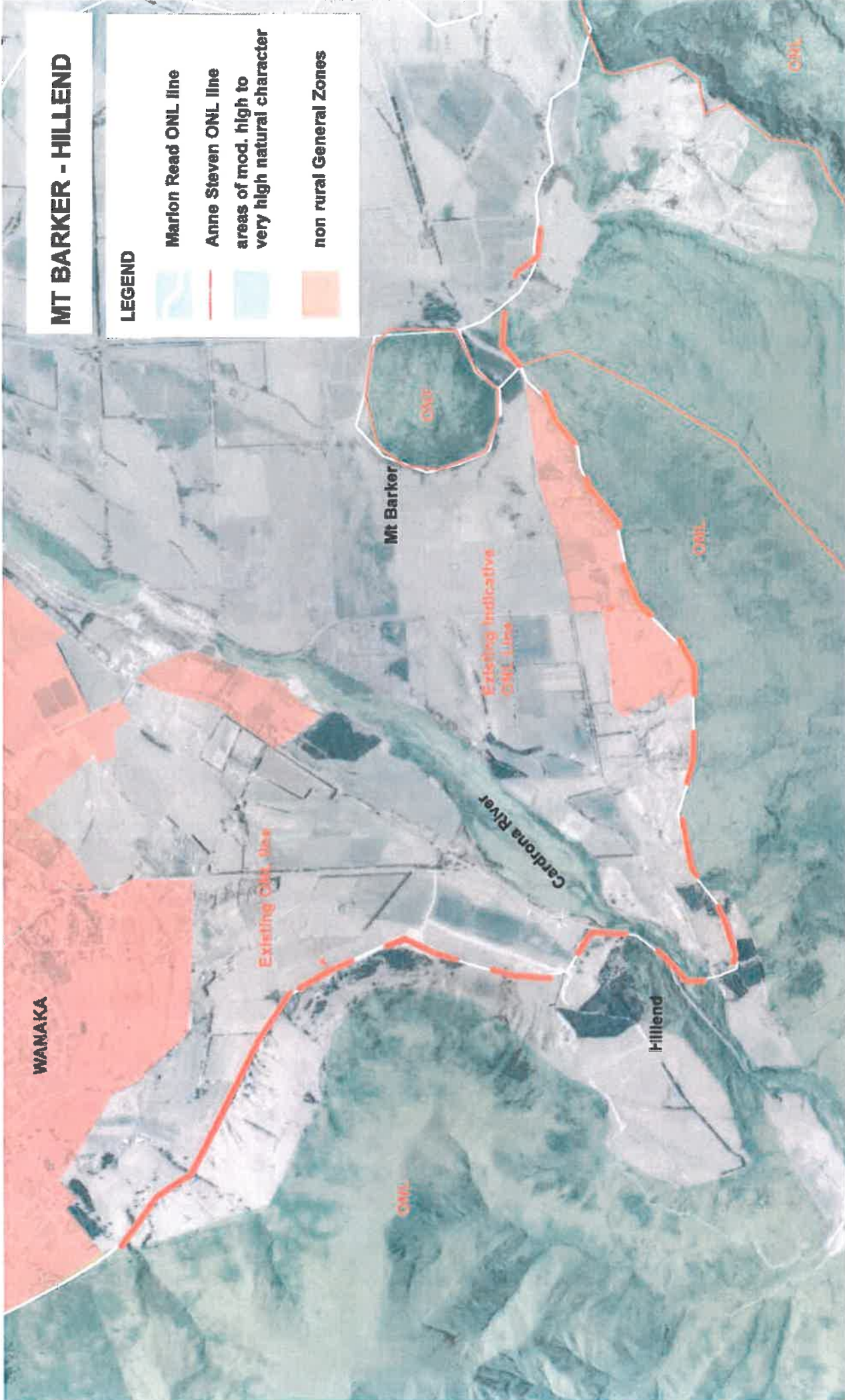


LEGEND

-  Marion Read ONL line
-  Anne Steven ONL line
-  areas of mod. high to very high natural character
-  non rural General Zones

Google earth

Imagery Date: 12/22/2012 44°45'38.58" S 169°15'39.62" E elev 467 m eye alt 9.48 km



MT BARKER - HILLEND

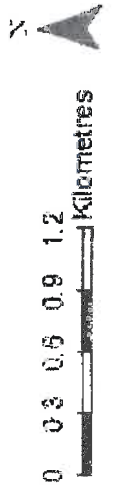
LEGEND

-  Marlon Read ONL line
-  Anne Steven ONL line
-  areas of mod. high to very high natural character
-  non rural General Zones

used to determine the location of the boundary of the proposed planning zone. To the extent possible, the Council has endeavored to ensure that the proposed planning zone is consistent with the objectives of the Resource Management Act 1991 and the Resource Management Act 1991. The Council has endeavored to ensure that the proposed planning zone is consistent with the objectives of the Resource Management Act 1991 and the Resource Management Act 1991. The Council has endeavored to ensure that the proposed planning zone is consistent with the objectives of the Resource Management Act 1991 and the Resource Management Act 1991.

Mt Barker to Hillend

27 May 2006



Appendix 2

QLDC Landscape Categorisation Lines – Paul Smith – July 2015

TO: CRAIG BARR, QUEENSTOWN LAKES DISTRICT COUNCIL

SUBJECT: QLDC LANDSCAPE CATEGORISATION LINES

REPORT PREPARED BY: PAUL SMITH (LANDSCAPE ARCHITECT)

REPORT REVIEWED BY: BEN ESPIE (LANDSCAPE ARCHITECT)

DATE: 20TH JULY 2015

INTRODUCTION

1. The purpose of this memo is to identify the landscape categorisation line that separates the Outstanding Natural Landscape (District Wide) (ONL(DW)) from the Visual Amenity Landscape (VAL) situated within and in the vicinity of Criffel Station, and why three escarpment faces located in south Hawea, in the vicinity of McKay Road and SH8 are incorrectly categorised as an ONF.

CRIFFEL RANGE

Brief description of the Criffel Range and its surrounds

2. I produced a landscape and visual effects assessment report regarding subdivision in the eastern part of Criffel Station in February 2014¹ (my 2014 report). My 2014 report describes the landscape character of the northern slopes of the Criffel Range as follows:

*"The mountainous slopes of the Criffel Range meet a number of terraces that rise up from the basin floor. These terraces and their associated escarpment faces are visually distinguishable from the rugged mountain slopes and they are of different geomorphology and geology to the mountain slopes. They have deeper, more fertile soils and therefore have been modified by farming much more than the mountain slopes. It is visually apparent that they are utilised for agricultural crop production and other farming purposes that are similar to those that occur on the floor of the Upper Clutha Basin."*²

*"The lower terrace is at a similar elevation to Mt Barker Road. The upper terrace comprises of a large area of verdant paddocks and is separated from the lower terrace by a steep escarpment face that is up to 40 metres in height."*³

¹ Vivian+Espie Ltd; Paul Smith; 13th February 2014; Criffel Station – Land Use and Subdivision Proposal – Mt Barker Road, Wanaka – Landscape and Visual Effects Assessment Report.

² Ibid. Paragraph 7

³ Ibid. Paragraph 11

3. The upper terrace extends from approximately Knob A3KV to the ridgeline that the Criffel Diggings Track is located on. The lower terrace is practically part of the floor of the Upper Clutha Basin as it is at a similar elevation to Mt Barker Road. However the western end of this terrace, near the southern toe of Mt Barker, it is separated from Mt Barker Road by an escarpment face.
4. South and east of the upper terrace is Knob A3KV that stands approximately 562 masl, similar in height to Mt Barker, and is separated from the Criffel Range by Luggate Creek. It is visually apparent that this hill has been managed in a similar manner to the upper slopes of the Criffel Range. When viewed from the surrounding areas it is difficult to distinguish this hill from the Criffel Range.

"The overall character of the northern slopes of the Criffel Range landscape, the values associated with it and their significance are that of a relatively dry and tussock dominated open landscape that is for the most part only utilised by high country farming. Appreciation of these slopes can be gained from the wider reaches of the Upper Clutha Basin and the surrounding elevated areas"⁴

5. In summary, the terraces located at the toe of the Criffel Range have been modified over a number of decades for farming purposes. These terraces and the values associated with them evidently differ from the slopes of Criffel Range and have much in common with the floor of the Upper Clutha Basin.

The landscape categorisation line

6. Categorising the landscapes of a district into outstanding natural landscapes and landscapes that are not both outstanding and natural is an exercise that must obviously be done at a very large scale.
7. A report produced by Dr Marion Read⁵ outlines her opinion of the location of the landscape categorisation line along the northern toe of the Criffel Range. Dr Read's assessment of this landscape categorisation line was reviewed by Ms Anne Steven⁶. Ms Steven opined the landscape categorisation line to be located differently to Dr Read. Dr Read produced a

⁴ Ibid. Paragraph 8.

⁵ Read Landscapes; Dr Marion Read; 1st April 2014; Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features.

⁶ Anne Steven Landscape Architect; Anne Steven; June 2014; Peer Review of Landscape Assessment - Outstanding Natural Landscape of the Upper Clutha Part of the Queenstown Lakes District - For the Queenstown Lakes District Council.

"Post Review Amendments Report"⁷ which took into consideration Ms Steven's assessment. In this report Dr Read concluded that she did not accept Ms Steven's position on the location of this line.

8. Dr Read's report describes the landscape categorisation line from the District boundary east of Luggate township to west of Mount Barker as stated below and as shown on Appendix 1 and 2 of this memo.

*"In my opinion the boundary of this ONL should follow the base of the Pisa Range from the District boundary skirting around behind Luggate along the boundary of the residential zoning and then follow the true right bank of Luggate Creek. It should cross the creek to the south of the knob 'A3KV' to incorporate the bluff system beyond its left bank within the ONL. The line should then follow the southern and western edge of the north facing terrace until the vicinity of Mount Barker is reached. This incorporates the farmed terraces within the ONL(DW) and is consistent with the Environment Court's decision in the Bald Developments case."*⁸

9. My 2014 report assessed the landscape categorisation of Criffel Station and briefly describes the distinguishable characteristics that define the location of the landscape categorisation line as stated below.

*"This boundary line shown on Appendix 8B – Map 1 of the District Plan does not extend east to the immediate vicinity of Criffel Station since this vicinity has not been examined in detail by any past Environment Court proceedings."*⁹

*"I consider that there are significant distinguishable characteristics between the Criffel Range mountainsides and the terraces that are immediately adjacent to the floor of the Upper Clutha Basin. These terraces share many characteristics with the basin floor. Overall, I consider the landscape category boundary extends east along the toe of the mountain range and along the upper edge of the terraces as is shown on Appendix 2 of this report."*¹⁰

10. The landscape categorisation line as shown on Appendix 2 of my 2014 report is shown on Appendix 1 and 2 of this memo. I disagree with Dr Read's landscape categorisation line for the following reasons:

- The northern slopes of the Criffel Range are of a relatively dry, tussock-dominated, extensively managed, open landscape. This landscape character differs to that of

⁷ Read Landscapes; Dr Marion Read; 16th October 2014; Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features: Post review amendments.

⁸ Ibid. Paragraph 3.7.5.1.

⁹ Ibid. Paragraph 10.

¹⁰ Ibid. Paragraph 12.

the terraces that have been utilised for more intensive agricultural purposes for many decades. The landscape character and the activities that occur on these terraces are identical to those of the floor of the Upper Clutha Basin.

- The location of Dr Read's landscape categorisation line is somewhat contradictory in relation to the justification set out in her report for the following reasons:
 - Dr Read's line ascends/descends the escarpment face immediately east of Smith Road in a way that does not relate to landform. Dr Read's line does not consistently follow the toe or the top of the escarpment.
 - The terrace that Dr Read considers to be part of the ONL(DW) is a relatively small part of the overall terrace system located at the toe of the Criffel Range. Dr Read considers the remainder of this relatively large terrace not to be categorised as part of the ONL.
 - Dr Read's line bisects a flat paddock area of the terrace, in a way that is unrelated to landform, so as to include a bluff system immediately west of Knob A3KV.
 - The bluff system has similar landscape characteristics to much of Knob A3KV, however Dr Read does not include Knob A3KV in the identified ONL.

11. Taking into account all of the above, I consider that the landscape categorisation boundary line should be drawn as shown by the red line on Appendix 1 and 2 of this memo.
12. In summary, the vast, open, rugged, steep, extensively farmed mountain slopes of the Criffel Range have a landscape character that is consistent with an ONL categorisation. The flat, verdant, intensively farmed terraces and valley floor have a landscape character that is consistent with a RLC categorisation.

THE THREE ESCARPMENTS FACES

13. Part of an escarpment face located within the vicinity of the McKay and Luggate-Tarras Road intersection has been categorised as being an ONF, as can be seen on Appendix 3. The two escarpment faces that separate the large terrace system located south-west of the

Grandview Mountain Range have been categorised as being ONFs, as can be seen on Appendix 3.

14. I produced a landscape and visual effects assessment report regarding a land use proposal within the Lagoon Valley Dairies Ltd, a farming property situated north of this terrace system, in January 2015¹¹ (my 2015 report). My 2015 report briefly describes the landscape character of the terrace system as follows:

*"The western side of the Grandview Mountain Range abruptly ends as it adjoins the eastern edge of the Upper Clutha Basin. In the vicinity of the Clutha River and the Crook Bum, the Grandview Mountain Range forms a number of terraces that descend down to the basin floor. These terraces and their associated escarpment faces are visually disguisable from the rugged mountain slopes and they are of different geomorphology and geology, being of deposited rather than up-thrust material. They have deeper, more fertile soils and therefore have been modified by farming much more than the mountain slopes. It is visually apparent that they are utilised for agricultural crop production and other farming purposes that are similar to those that occur on the floor of the Upper Clutha Basin. In many cases these terrace lands have deeper soils than the valley floor and hence are more useful for production."*¹²

15. Dr Read's "Post Review Amendments Report"¹³ took into consideration Ms Steven's assessment. In this report Dr Read concluded that she accepts Ms Steven's position on the terrace scarp's being an ONF. *"Ms Steven, while excluding the mountains from the ONL wishes to include the Glenfoyle Terrace Scarps as ONF. I consider that her reasoning for this is sound and I have amended the maps accordingly."*¹⁴

16. I disagree with Dr Read adopting these escarpment faces as being ONFs for the following reasons:

- ONFs identified within the Queenstown Lakes District include hills, river corridors, islands, lakes and other natural features that are distinct from their surroundings. Examples include the Shotover Gorges, Roys Peninsula, Mt Iron, Mt Barker and Slope Hill. The escarpment faces in question are part of the terrace system that extends south-west of the Grandview Mountains. They are inextricably linked to the terrace tread and to the greater landscape. I do not consider that they are

¹¹ Vivian+Espie Ltd; Paul Smith; 27th January 2015; C Wing & L Rickman – Land Use Proposal – Kane Road, Wanaka – Landscape and Visual Effects Assessment Report.

¹² Ibid. Paragraph 10.

¹³ Read Landscapes; Dr Marion Read; 16th October 2014; Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features: Post review amendments.

¹⁴ Ibid. Paragraph 3.6.4.

sufficiently distinct from their context to be considered as features. They are not independent from their surroundings.

- The relevant escarpment faces are geomorphologically legible and are visually interesting. However, I do not consider that they can be said to stand out from the rural landscapes and features of the district in terms of landscape merit. They are simply not remarkable or valuable enough to be termed outstanding. To do so would be to devalue the term outstanding within our district; to set the bar to low which may have significant consequences. Obviously it is the case that there are many visually prominent and geomorphologically interesting parts of our rural landscapes that are valued in their current state. This does not mean that we need to stretch the definition of the term outstanding to include them. They can sit comfortably within our non ONL landscapes and still gain appropriate protection by the District Plan's provisions.
- The escarpment face separating the elevated terrace at the toe of the Criffel Range from the Upper Clutha Basin that lies further to the north has not been categorised by Dr Read or Ms Steven as ONL or ONF. This seems inconsistent and weakens the case for the identified escarpments to be included.
- The vegetation cover on these escarpment faces varies. There is some native grey shrub cover but there is also considerable pasture grass cover. Again I consider this weakens the case that the escarpment faces are distinct features or are outstanding.

17. In summary, the escarpment faces that have been identified by Dr Read are simply parts of the greater landscape in the way that many escarpments or other pieces of landform throughout the district are. They are not significantly distinct from their surroundings to be features in their own right. Similarly they are not remarkable enough in terms of natural, physical, perceptual or associative factors to be termed outstanding. I consider they should be categorised as the surrounding landscape.



REF: 0375 Appl
DATE: 20.07.2015
SCALE: NOT TO SCALE

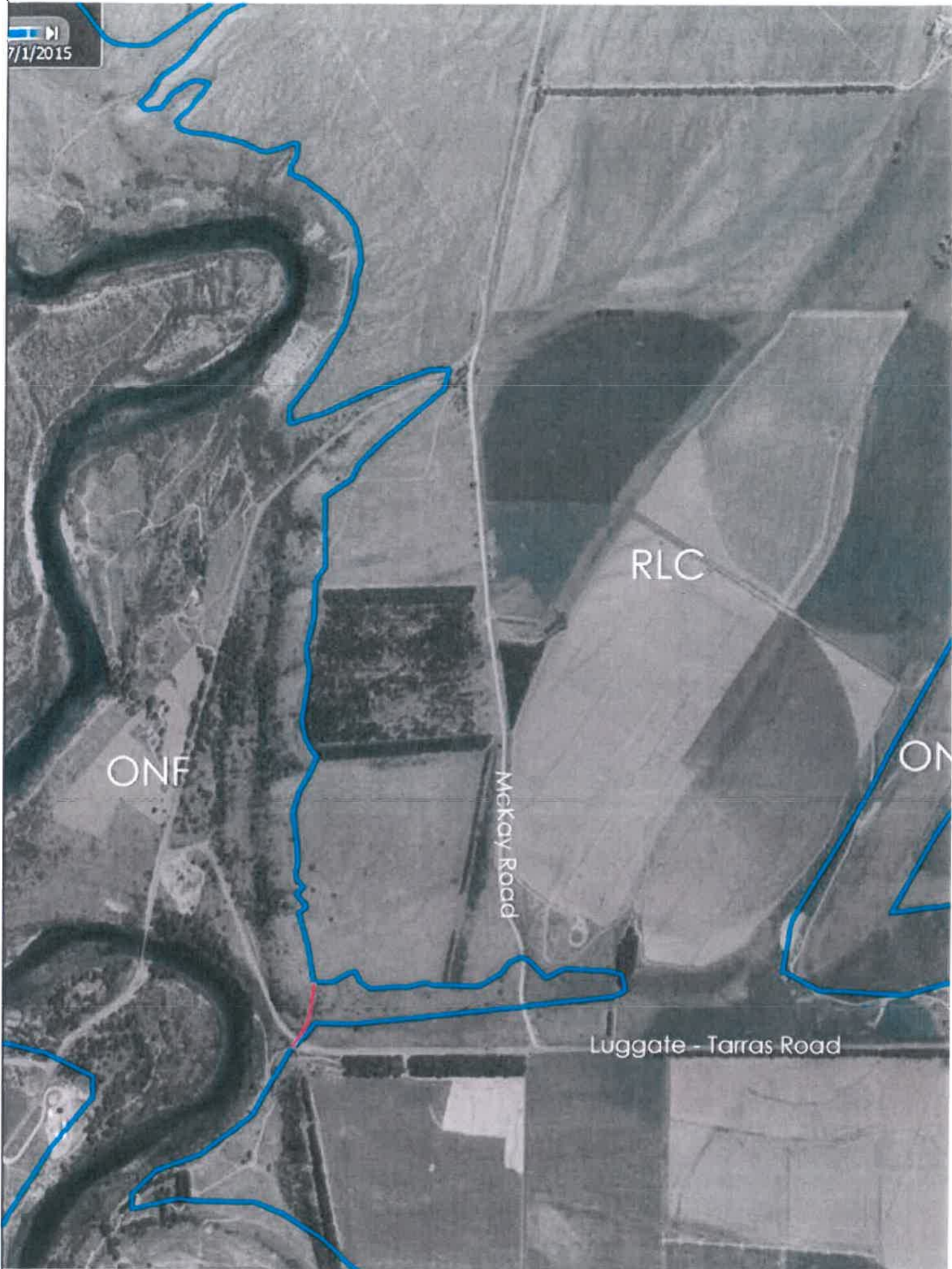
Appendix 1: Landscape



Knob A3KV

REF: 0975_A3KV.2
DATE: 20 07 2015
SCALE: NOT TO SCALE

Appendix 2: Landscape



Appendix 3

Excerpts from;

Statement of Evidence of Helen Mellsop on Behalf of QLDC

Landscape - 17 March 2017

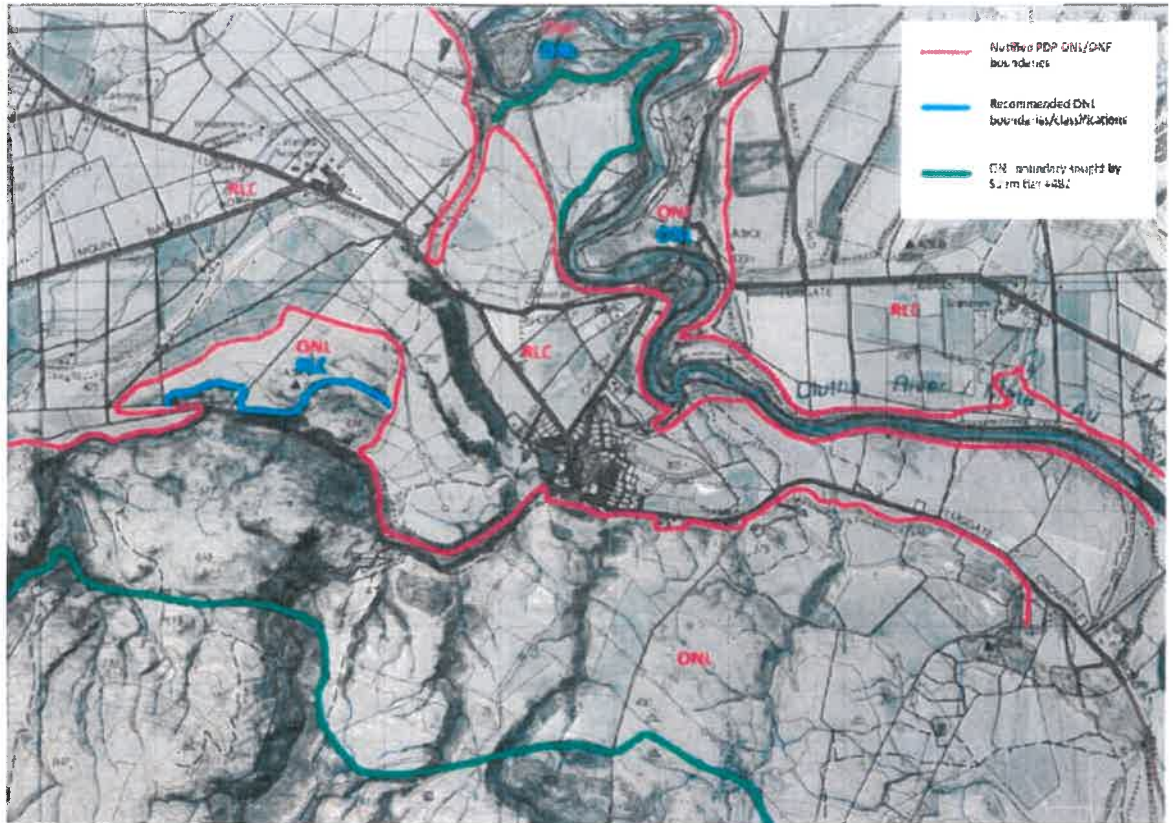


Figure 4: Notified and recommended ONL boundaries on and near Lake McKay Station, and ONL boundaries sought by the submitter.

Northern end of Pisa/Criffel Range from Luggate Creek gorge to Mount Barker

8.30 In Dr Read's landscape boundaries report [CB68], Ms Steven's peer review [CB70] and Mr Smith's assessment [CB71], there were differences of opinion in regard to the appropriate location of the ONL boundary at the northern end of the Criffel and Pisa Ranges on Criffel Station and LMS. The boundaries recommended by Mr Smith were included in the notified PDP. LMS has sought a boundary roughly following the 600 above mean sea level (amsl) contour (refer Figure 6 below), though the boundaries sought are somewhat contradictory on the two maps appended to the submission: LMS has sought this boundary change on the basis that indigenous vegetation clearance and pasture improvement has been undertaken on the slopes below 600 amsl and that this part of the range has a modified farming character.

8.31 Having visited the area and assessed the landscape character and values I am largely in agreement with Mr Smith's boundary on Criffel and Lake McKay stations, but with one modification to correct an

inconsistency in his reasoning. The northern end of the Criffel/Pisa range, which is recognised as an ONL, is a complex landscape where the ice-eroded schist mountains meet glacial lateral moraine remnants, mounds and terraces of glacial till and outwash plain terraces. On both properties, the ice-eroded shoulder of the range below 600 amsl does include some areas of gentler contour and moraine remnants overlaying schist bedrock.

8.32 However as with the northern Pisa Range to the east, the lower ice-eroded shoulder that is sought to be excluded is a visually coherent part of the mountain landscape, despite the areas of improved irrigated pasture and cropping (refer **Photograph 8** below). It is also an integral part of the ONL from a geomorphological perspective.

8.33 At Criffel Station, the till and glacial outwash gravels at the base of the ranges have been eroded by subsequent fluvial action to form a terrace and escarpment system. From closer viewpoints on Mount Barker Road and Ballantyne Road the terraces are not highly visible and the vegetation-covered escarpments appear part of the mountain range behind (refer **Photograph 7** below). From more distant elevated viewpoints the terraces are legible and it is clear that they form an extension of the terrace system that wraps around Knob A3KV (refer to **Figure 5** and **Photograph 8** below). This hill and a smaller conical hillock on the Criffel Station terrace consist of lateral moraine remnants over schist bedrock and are of a different landscape character to the mountains behind. I therefore recommended that the majority of Knob A3KV be excluded from the ONL.



Photograph 7: View towards terrace escarpments at Criffel Station from Smith Road (panorama stitched from 3 photographs taken at 50mm lens equivalent at 3.22pm on 4/12/16).



Photograph 8: View towards northern end of Pisa/Criffel ranges from Mount Iron (panorama stitched from 2 photographs taken at 50mm lens equivalent at 10.00am on 4/12/16).

- 8.34** Given the complex topography of this area and the varying levels of naturalness I consider the most defensible method of determining the ONL boundary is on geomorphological and visual integrity grounds. The edge of the schist mountain runs along the rear of the terraces on Criffel Station, roughly in the location of the notified PDP line and to the north of Luggate Creek gorge on the southern side of Knob A3KV (refer **Figure 5** below). This geological boundary is reflected in the landform and vegetation, with rougher steeper ground and greater indigenous vegetation cover within the schist areas, and more even contours and less indigenous vegetation on the terraces and lateral moraines. The recommended ONL boundary, following these changes in geology, landform and land cover is shown in **Figure 6** below and in **Figure 4** above.

