

Te Tai o Poutini Plan

LANDSCAPE REPORT



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1.0 Executive Summary

- 1.1 Relying on the reasoning set out in the main body of this report, the updated ONL mapping (January 2024) and notified ONL Schedules are considered to be broadly in accordance with landscape assessment best practice and are, generally, technically sound.
- 1.2 The following amendments to the notified ONL Mapping and Schedules are recommended:
- a) Reference to the SASMs that coincide with ONLs are included in the relevant ONL Schedule.
 - b) Any more detailed evidence with respect to tāngata whenua values for ONL areas provided by submitters during the hearing process is incorporated in the relevant ONL Schedule text.
 - c) Clear guidance is included in the TTPP (perhaps by way of a Preamble to TTPP Part 4: Schedule Five: Outstanding Natural Landscapes), that explains:
 - i. the reasonably high-level nature of the ONL Schedules;
 - ii. that the landscape values identified relate to the ONL as a whole, rather than specific sites; and
 - iii. that other landscape values may be identified as part of an application-specific landscape assessment, including landscape modifications that are an accepted part of the landscape (e.g. infrastructure, buildings) and more negative landscape attributes (e.g. pests).
 - d) The updated ONL mapping (January 2024) is carefully reviewed by a landscape/GIS expert to ensure:
 - i. the following areas are excluded from the mapped ONLs:
 - Sizeable pastoral areas.
 - Sizeable plantation forestry areas, particularly on the edges of ONLs.
 - Areas where the arrangement, scale, and/or prominence of built development exerts a dominant influence on landscape character.
 - ii. ONL linework is 'clipped' to obvious landform and or contiguous native vegetation cover edges in the immediate vicinity of the mapped ONL.
 - iii. the mapping of the southern end of ONL 5 is amended to extend to the district boundary.
 - e) In response to location specific ONL submissions:
 - i. Minor refinement of the ONL 14 mapping in the vicinity Donovan Drive, Franz Joseph is recommended to follow a 'landscape' rather than a zone boundary. (S449 Totally Tourism Limited.)
 - ii. Minor refinement of the ONL 31 mapping to exclude the patterning of dwellings throughout the lower slopes across the western side of the Rapahoe Range and include the elevated and contiguous bush area that sits above the dwellings. (S506 Claire and John West and others.)
 - iii. Minor refinement of the ONL 29 mapping to exclude grazing land. (S515 Russell Robinson.)

- iv. Minor refinement of the ONL 26 mapping to exclude grazing land and plantation forestry areas around the edges of the ONL. (S599 WMS Group (HQ) Limited and WMS Land Co. Limited.)
- v. Refinement of the updated ONL mapping (January 2024) so that areas of pine plantation on the following properties are excluded from the ONL mapping:
 - Site between Waitaha River and Poerua River that coincides with ONL 17
 - Lot 1 Deposited Plan 3135 (near The Forks) ONL15
 - Site between Lake Hochstetter and Lake Haupiri ONL32
 (S620.158 Te Rūnanga o Ngāi Tahu, Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio.)

2.0 Introduction

- 2.1 The West Coast Regional Council (**Council**) engaged Bridget Gilbert Landscape Architecture Limited (**BGLA**) in December 2023 to undertake a review of the Outstanding Natural Landscapes (**ONLs**) identified in the West Coast districts by Stephen Brown of Brown NZ Ltd and provide expert landscape comment in response to specific ONL related submissions on the Proposed Te Tai o Poutini Plan (**TTPP**).
- 2.2 BGLA has experience in the evaluation and identification of ONLs (and other landscapes) in Aotearoa New Zealand, having undertaken: district-wide landscape studies in Tasman District and Waitomo District; the Wakatipu Basin Landscape Study; the preparation of Landscape Schedules for fifteen Priority Area ONF/Ls in the Queenstown Lakes District; and participated in several council and Environment Court hearing processes concerning the methodology, mapping, and scheduling of ONLs in Northland, Auckland, the Hauraki Gulf Islands, Thames-Coromandel District, the Taranaki region, and the Kapiti Coast. This has included providing advice to Councils, iwi groups, and private clients.
- 2.3 The author is also an experienced Hearing Commissioner for Auckland Council and has sat on hearings in which ONF/L issues are at play. Further, the author was one of three peer reviewers of Te Tangi a te Manu (Aotearoa New Zealand Landscape Assessment Guidelines) (**TTatM**), which has given her a thorough understanding of landscape assessment best practice.



Photograph 1: Outlook across the coastline to the north of Cape Foulwind

- 2.4 The documents relied on in the preparation of the Landscape Report are as follows:
- a. West Coast ONL Schedules, Maps and Photographs, dated 2013, prepared by Brown NZ Ltd. (**2013 Brown ONL Mapping and Schedules**).

- b. West Coast Landscape & Natural Character Study 2012 and 2013: Explanation of Assessment Methodologies, prepared by Brown NZ Ltd, dated March 2021 (**2021 Brown Methodology Report**).
 - c. West Coast Landscape Study: Review of Outstanding Natural Landscapes & Areas of High & Outstanding Natural Character, prepared by Brown NZ Ltd, dated March 2022 (**Brown 2022 ONL Mapping Review Report**).
 - d. Revised West Coast ONL Maps, prepared by Brown NZ Ltd, dated 2022 (**Brown 2022 ONL Mapping**, resulting from the Brown 2022 ONL Mapping Review Report).
 - e. TTPP Section 32 Evaluation: Report Five (Natural Environment Values – Ngā Uara Taiao Aotūroa; Ecosystems and Biodiversity – Ngā Pūnaha Rauropi me te Kanorau Koiora; Natural Features and Landscapes – Ngā Āhua me ngā Horanuku Aotūroa; Coastal Environment – Te Taiao o te Takutai; Natural Character and Water), prepared by Council (**s32 Report 5**).
 - f. TTPP GIS mapping resource (**updated ONL Mapping (January 2024)**). This mapping was prepared in January 2024 and comprises a more accurate, legible, and ‘accessible’ (or plan user friendly) version of Brown 2022 ONL mapping.
- 2.5 The notified TTPP mapping and provisions includes the Brown 2013 ONL Mapping and Schedules (refer TTPP Maps and TTPP Part 4: Schedule Five: Outstanding Natural Landscapes respectively).
- 2.6 It is understood that the s42A Hearing Report for the Natural Features and Landscapes Topic (the s42A Report) author¹ has recommended that the 2024 ONL Maps (which integrate the review work undertaken by Brown NZ Ltd in 2022) replace the notified TTPP ONL maps.
- 2.7 This Landscape Report is based on the **updated ONL Mapping (January 2024)** and the **notified TTPP ONL Schedules (ONL Schedules)**.
- 2.8 Further, relying on the S42A Report, it is the author’s understanding that the key policy test in the TTPP in relation to ONLs is:
- NFL-01** ~~To protect~~ *The values of outstanding natural landscape and outstanding natural features on the West Coast/Te Tai o Poutini are protected from inappropriate subdivision, use and development, while providing for subdivision, use and development where the values that make the landscape or feature outstanding can be maintained or enhanced.*
- 2.9 The author has also had the benefit of informal discussions with Mr Stephen Brown that have assisted her understanding of how the ONL mapping work was undertaken in 2013 and 2022.
- 2.10 BGLA is familiar with the West Coast districts generally, having visited the area on a number of occasions. A specific site visit was made in mid-January 2024 to review location-specific ONL submissions, particularly near Karamea, Greymouth, and Punakaiki; and to visit the case study area (Lake Brunner).

Report Structure

- 2.11 The landscape report is structured to:
- a. Provide comment as to whether the **methodology** that has informed the notified ONL Mapping (and the more recent 2024 ONL GIS mapping) and the notified ONL Schedules is consistent with landscape assessment best practice. This includes testing via a ‘**case study**’ review of the ONL mapping in the vicinity of Lake Brunner.
 - b. Provide comment in response to **location specific ONL related submissions** on the TTPP.
 - c. Make **recommendations** with respect to the TTPP ONL Mapping and Schedules.

¹ Ms Lois Easton.

3.0 ONL Assessment Methodology

- 3.1 The 2021 Brown Report explains the background to the ONL mapping and advises that four key considerations drove the 2013 ONL mapping:
- a. Section 6(b) of the Resource Management Act making “the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development” a Matter of National Importance;
 - b. Accepted definitions of ‘Landscape’, including those found in the NZ Institute of Landscape Architects’ (NZILA) Charter;
 - c. Recent case law, and related interpretation of landscape values and effects, from the NZ Environment Court; and
 - d. The NZILA’s then-recent Best Practice Note: Landscape Assessment and Sustainable Management 10.1.
- 3.2 I confirm that these key principles are sound; however, I note that since that time, the NZILA has published TTatM which forms the most up-to-date guidance for landscape assessment in Aotearoa New Zealand. The comments that follow have factored in the approach to landscape assessment recommended in TTatM.



Photograph 2: Typical character of pastoral land (not ONL) framed by bush covered mountains (ONL) near Karamea.

Scale of Landscape Assessment

- 3.3 It is noted that the 2013 ONL Mapping and Schedules form a ‘standalone’ document rather than part of a ‘full’ landscape study of the districts in which all landscapes (i.e. not just ONLs) are evaluated. While it is acknowledged that a full landscape study is usually preferable, it is noted that several district and regionwide landscape assessments throughout the country are similarly structured to focus on identifying RMA s6(b) landscapes only (for example, Auckland, Northland, Waikato).

- 3.4 When such an approach is used, it is critical that the thresholds for 'naturalness' and 'outstanding-ness' are technically robust, and the evaluation and identification of the ONLs is tested via an iterative process in which the landscape assessor 'steps back' to: consider the landscape values 'in the round'; and applies the accepted thinking that, in general, ONLs should be so obvious that there is no need for expert evaluation. These matters are discussed shortly under the discussion of the 'landscape assessment process'.
- 3.5 In addition, expert peer review is typically required where such an approach is adopted. Although a peer review did not inform the notified ONL Mapping and Schedules, this Landscape Report is, in essence, a peer review and includes a case study review of the ONL mapping in the vicinity of Lake Brunner to test the thresholds for naturalness and outstanding-ness along with the ONL mapping methods.

Landscape 'Factors'

- 3.6 A series of 'factors' (or criteria) are listed in the ONL Schedules, grouped under three 'landscape dimension headings': Biophysical Landscape Characteristics; Perceptual/Aesthetic Values; and Associative Values.
- 3.7 While some language has been modified over the intervening time (and in TTatM), the headings and factors align reasonably well with the sorts of characteristics and values that should be considered in an assessment of landscape values as recommended in TTatM² (and as informed by the *WESI* or *modified Pigeon Bay* factors and, more recently, in decisions such as *Lammermoor* and *Upper Clutha*). Put another way, the range of matters addressed in the ONL Schedules adequately 'cover the field' (subject to the comments below in relation to Tāngata Whenua Values and Heritage Values).
- 3.8 However, it is noted that all of the ONL Schedules acknowledge that Tāngata Whenua Values and Heritage Values have not been factored into the landscape evaluation.

Tāngata Whenua Values

- 3.9 TTatM explains that landscape in Aotearoa New Zealand embraces both tāngata whenua and western perspectives of landscape. This means that the evaluation of landscapes needs to integrate tāngata whenua knowledge.³
- 3.10 The 2021 Brown Methodology Report explains that very little information was available in 2012 about tāngata whenua values. The s42A Report discusses the Ngāi Tahu submission at paragraph 69. The hearing report author supports the Ngāi Tahu submission that further work is done to engage with Ngāi Tahu and that the proposed ONF/Ls are reviewed against the Sites and Areas of Significance to Māori (SASMs). The hearing report author goes on to recommend that the SASMs that coincide with ONLs are referenced in the relevant ONL: Schedule. I support that recommendation.
- 3.11 I also recommend that any more detailed evidence with respect to tāngata whenua values provided by submitters during the hearing process is incorporated in the ONL Schedules text.

Heritage Values

- 3.12 The 2021 Brown Methodology Report discusses heritage values, explaining that at the time of the 2013 work, many of the heritage features and values that are likely to be associated with the districts were considered to contribute to the cultural history of the districts, rather than the natural heritage or natural landscape values. Since that time, there has been a move towards integrating heritage values into the landscape assessment process.

² For example, see TTatM [4.29].

³ Refer TTatM Section 4: What is Landscape.

- 3.13 Of relevance to this aspect of the districts' landscape values, is the rich history of the area for mining (gold, coal) in terms of shaping the physical landscape and the identity of the area.
- 3.14 In the case of active coal mines in particular, while such features are of important cultural value, they are often sufficiently modified such that they do not qualify as an ONL in terms of naturalness.⁴



Photograph 3: Cottage at Millerton

- 3.15 I note that there are no specific submissions seeking the inclusion of a place or area on the basis of historic heritage values, nor requests that ONL Schedules are amended to acknowledge particular historic heritage values.
- 3.16 For these reasons, no further amendments are recommended in this regard.

‘Other Expert’ Disciplines

- 3.17 No specific ‘other expert’ disciplines⁵ were involved in the landscape assessment process that informed the TPP ONLs.
- 3.18 While such input is beneficial, it is not uncommon for landscape assessments in Aotearoa New Zealand to be undertaken in this way, with the landscape expert relying on published material such as the Geopreservation Inventory, District Plan mapping of SNAs and heritage features, tourist publications, and LINZ Topo mapping of walking tracks and cycling trails and the like to assist their evaluation. I understand this to be the approach adopted by Brown NZ Ltd.

⁴ For example, the Denniston Plateau which the Environment Court concluded did not form part of an ONL due to the level of modification. See [2013] NZEnvC 047 discussion [45] to [49].

⁵ For example, geomorphology, ecology, heritage, recreation, and tourism.

Naturalness Threshold

- 3.19 It is well established⁶ that the following three questions underpin the identification of an ONL in New Zealand:
- Is the relevant area a ‘feature’ or a ‘landscape’?
 - Is the feature or landscape ‘natural’ enough to qualify for consideration as a RMA s6(b) landscape?
 - If so, is the ‘natural landscape’ ‘outstanding’?
- 3.20 The 2021 Brown Methodology Report explains that the naturalness threshold that has been applied assumes that a landscape has to be either wholly or largely / predominantly natural to qualify as an ONL, taking into account both the biophysical qualities of that landscape and human perception of it.
- 3.21 Relying on TTatM⁷ and case law⁸, this approach is considered to be technically sound.

Outstanding Threshold

- 3.22 The 2021 Brown Methodology Report cites a number of Environment Court decisions in which the threshold for outstanding-ness is discussed, concluding that *“any assessment of landscape values necessarily involves an appreciation of the greater whole – of the landscape as both the product of its various elements and as ‘the sum of its parts’ – before determining if it is sufficiently conspicuous, eminent, and outstanding to be identified as an ONL.”*⁹
- 3.23 Relying on TTatM¹⁰ and case law¹¹, this approach is considered to be technically sound.

Landscape Assessment Process

- 3.24 Closely linked to the correct application of the thresholds for naturalness and outstanding-ness is the assessment process adopted by the landscape expert.
- 3.25 The s32 Report 5¹² explains the process of expert landscape input into the notified TTPP ONL Mapping and Schedules.

Stage:	Process:
1.	<p>Field Work – Mapping of ‘Sufficiently Natural’ Areas:</p> <p>Use of field work and aerial imagery to map all areas that might be considered ‘sufficiently natural’ to qualify as ONL candidates</p>
2.	<p>Draft Mapping of ‘Natural Landscapes’:</p> <p>Use of field work and aerial imagery to map the candidate landscapes based on their:</p> <ul style="list-style-type: none"> • Landforms • Vegetation Cover • Land Uses & Activities • Interaction with the sea / lakes / rivers / wetlands

⁶ For example, see *High Country Rosehip* [2011] NZEnvC 387: [74].

⁷ TTatM: [8.09] to [8.11].

⁸ For example: [2019] NZEnvC 160 [61]; [2019] NZEnvC 110 [50]; 2013 NZEnvC 047 [43] – [49]; [2011] NZEnvC 387 [93],[94]; [2009] Report and Decision of the Board of Inquiry into the North Island Grid Upgrade Project [1102] to [1106]; [2008] NZEnvC 78 [135]; [1999] Decision No. C180 [89].

⁹ Brown 2021 Methodology Report, page 8.

¹⁰ TTatM: [8.05] to [8.08].

¹¹ For example: [1999] Decision No. C180 [99], [105].

¹² Section 9.2.1.

Stage:	Process:
3.	<p>Evaluation of Each – Round 1:</p> <p>Detailed evaluation of each candidate landscape ‘on the ground’ employing the criteria set out overleaf</p>
4.	<p>Evaluation of Each – Round 2:</p> <p>Comparative evaluation of each candidate landscape as a whole, addressing them in terms of the ‘sum of their parts’ – the overall character, identity & spectacle associated with each landscape</p>
5.	<p>Overall Evaluation of Each Landscape:</p> <p>Assessment of each candidate landscape ‘in the round’ – both in terms of the assessment criteria set out overleaf and ‘as a whole’ – to determine if each was sufficiently conspicuous, eminent and ‘outstanding’ to qualify as a draft ONLs</p>
6.	<p>Review & Refinement:</p> <p>Review of the draft ONLs in response to feedback from the Regional and District Councils leading to the refinement & deletion of some draft ONLs</p>

- 3.26 Importantly, the assessment process above includes stepping back and considering the landscape ‘in the round’ and ‘as a whole’, which (as explained earlier) is critical to the correct and consistent application of thresholds for naturalness and outstanding-ness.
- 3.27 Further, the review and refinement process outlined above is an important ‘sense check’ step exercise in which the broader Council team queried aspects of the draft ONL work, which typically adds a helpful layer of local knowledge to the process and tests the accepted thinking that, in general, ONLs should be so obvious that there is no need for expert evaluation.



Photograph 4: Punakaiki bluffs

ONL Mapping

- 3.28 Mr Brown has advised that the general approach that he applied to the ONL mapping was to capture the areas of: contiguous bush cover and undeveloped waterbodies, coastal flats, lake margins, and river terraces; and align ONL boundaries with legible landscape boundaries (e.g. landform and vegetation patterns).
- 3.29 Typically pastoral areas, extensive stands of plantation forestry (particularly on the edges of the ONL areas), active mining areas, and locations where built modification forms a dominant landscape element (for example, where dwellings are of an arrangement, scale and/or prominence that they exert a dominant influence on landscape character) are excluded from the ONL mapping.
- 3.30 However, this is inevitably a question of expert judgement with respect to the scale of such modification relative to the landscape setting. This means that in some instances, scattered dwellings, pockets of plantation forestry and slivers of pastoral land are included in the mapped ONL, as to 'excise' the associated area would be artificial.
- 3.31 This general approach to ONL mapping aligns with landscape assessment best practice and is generally considered to be technically sound.
- 3.32 However, a more detailed review of the updated ONL Mapping (January 2024) in relation to the case study area (Lake Brunner) and location specific ONL submissions (refer Section 4), has revealed some minor ONL mapping inconsistencies, including capturing land that does not merit incorporation as ONL, or misaligning the ONL boundary linework where there is an obvious natural landscape boundary in the immediate vicinity (typically this is a bush edge).
- 3.33 Timing has not allowed the author to review the updated ONL Mapping (January 2024) across the entire district for inconsistencies of this nature.
- 3.34 For this reason, it is recommended that the updated ONL Mapping (January 2024) is carefully reviewed by a landscape/GIS expert to ensure:
- a) the following areas are excluded from the mapped ONLs:
 - i. Sizeable pastoral areas.
 - ii. Sizeable plantation forestry areas, particularly on the edges of ONLs.
 - iii. Areas where the arrangement, scale, and/or prominence of built development exerts a dominant influence on landscape character.
 - b) Linework is 'clipped' to obvious landform and/or contiguous native vegetation cover edges in the immediate vicinity.
- 3.35 In addition, it is evident that the mapping of ONL 5 follows an incorrect district boundary at its southern end. The land excluded from ONL 5 includes remote and dramatic, mountainous land in Mount Aspiring National Park and should be included in the ONL.
- 3.36 For this reason, it is recommended that the mapping of the southern end of ONL 5 is amended to extend to the district boundary.

ONL Schedules

- 3.37 The ONL Schedules were prepared by Brown NZ Ltd in 2013 and include:
- a. A table that lists the landscape evaluation factors, (grouped under the three dimensions of landscape, i.e. Biophysical Landscape Characteristics; Perceptual/Aesthetic Values; Associative Values), that identifies whether a factor is of relevance to the rating of landscape values in a simple binary way¹³;
 - b. A rating of the landscape values for the three dimensions of landscape using a five-point scale (low to high).
 - c. A brief written summary of the core landscape attributes and characteristics that underpin the outstanding-ness of the specific ONL.
- 3.38 The use of a five-point rating scale is considered to be adequate (although typically a seven-point scale is used in more recent landscape assessments).
- 3.39 It is fair to say that in more recent years there has been a move towards greater transparency in the reasoning that underpins the evaluation of an area as an ONL (and landscape values and landscape effects more generally). The discussion above, with respect to the thresholds for naturalness and outstanding-ness and the landscape evaluation process, along with the 'BGLA field work review' and 'case study' discussion shortly, signal fundamental support for the identification of the ONLs across the districts. This means that despite the brevity of the ONL Schedules, the evaluation and identification of the ONLs is considered to be technically adequate.
- 3.40 In addition to their role in explaining the thinking that underpins the landscape assessment work, ONL Schedules play an important role in assisting plan users' understanding of the values of an ONL that need to be protected; and, in the case of TTPP, the values that need to be maintained or enhanced when considering an application for subdivision, use, and development within an ONL.¹⁴
- 3.41 Again, there has been a move in recent years towards a more detailed explanation of the attributes and values that need to be protected in ONL Schedules, along with a more detailed description of the types of activities and development that form an accepted part of the high-value landscape.
- 3.42 However, in the author's experience, the benefits of this additional information need to be weighed against: the likely 'risk' to the landscape (i.e. how frequent are plan change and resource consent applications in the districts' ONLs?); and the considerably greater cost to the community of undertaking this more detailed work.
- 3.43 This means that in some circumstances, it can be appropriate to include reasonably 'high-level' ONL Schedules in a Plan and leave the more nuanced landscape detail to be determined as part of an application-specific landscape assessment.
- 3.44 It is considered that the ONL Schedules qualify as 'high-level' schedules in this regard. It is the author's expectation that there would be considerable resource (both in terms of time and cost to the community) required to thoroughly describe the landscape values that underpin each ONL.
- 3.45 However, it is recommended that clear guidance is included in the TTPP (perhaps by way of a Preamble to TTPP Part 4: Schedule Five: Outstanding Natural Landscapes), that explains:
- a. the reasonably 'high-level' nature of the ONL Schedules;
 - b. that the landscape values identified relate to the ONL as a whole, rather than specific sites; and

¹³ i.e. corresponding box is shaded or unshaded signalling whether the factor was of relevance to the evaluation of landscape values.

¹⁴ Refer TTPP NFL-01.

- c. that other landscape values may be identified as part of an application-specific landscape assessment, including landscape modifications that are an accepted part of the landscape (e.g. infrastructure, buildings) and more negative landscape attributes (e.g. pests).

BGLA Field Work Review

- 3.46 As explained earlier, field work has informed this Landscape Report. Consistent with landscape assessment best practice for a district-wide evaluation of ONLs, this has not involved detailed site visits, but rather: 'overview field work' of the districts' landscapes as accessed by public road (and in some instances walking tracks and cycling trails); and more focussed 'location field work' where a desktop review of the ONL mapping and/or public submissions suggest that refinement of the mapping may be required.
- 3.47 From this field work, it is the author's opinion that the fundamental (or general) findings of the Brown NZ Ltd work that much of the landscapes of the districts qualify as ONL is accurate and credible.
- 3.48 I also note that approximately 57% of the districts are identified as ONL, with approximately 97% of the identified ONLs coinciding with publicly owned land.

Case Study: Lake Brunner

- 3.49 The author has visited the Lake Brunner area and reviewed the updated ONL 29 mapping (January 2024). This has included access to the following GIS mapping resources: contours; landcover; DoC Protected Areas; DP zoning; National Parks; SASMs; SNAs and the notified ONL mapping.
- 3.50 The general extent and configuration of the ONL 29 overlay mapping in the vicinity of Lake Brunner is considered to be correct, however would benefit from review by a landscape/GIS expert to 'clip' the overlay boundary to obvious lake landform and/or contiguous bush cover edges. It is the author's expectation that this 'clipping' exercise is likely to be required across all of updated ONL mapping (January 2024).

4.0 Response to Location Specific ONL Submissions

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
S217 Murray Stewart	Remove outstanding natural landscape overlay from property in Hohonu area. 746 Taramakau Settlement Road	ONL 28	No ONL overlay applies to this property. (NB a Precinct overlay applies to the land.)	No change to updated ONL mapping (January 2024) required.
S250.008 Skyline Enterprises Limited	The submitter opposes the mapping and all Objectives, Policies, and Rules of the TTPP that address development within the Franz Josef Glacier/Ka Roimata o Hinehukatere Valley and without derogating from the breadth of the submissions scope, specifically have concern with the following: Outstanding Natural Features (ONL 14/ONL 16)	ONL 14 ONL 16	Having reviewed the updated ONL mapping (January 2024), the general extent and configuration of the ONL 14 and ONL 16 mapping in the vicinity of Franz Joseph is considered to be correct. There is an inference in the submission that because part of the area may be appropriate for a cableway at some time in the future, it is appropriate to exclude that area from the ONL. Such an approach does not align with landscape assessment best practice which assesses the landscape 'as it is' (taking into consideration the 'existing environment') and does not include consideration of development that may or may not occur at some time in the future as a relevant part of landscape values.	No change to updated ONL mapping (January 2024) required.
S342.001 Fernando Tarango and others	Include "The Pyramid" feature at Karamea as an Outstanding Natural Landscape	Currently none	Having reviewed the updated ONL mapping (January 2024) and visited the area, the general extent and configuration of the ONL overlay in the vicinity of 'The Pyramid' near Karamea is considered to be correct, as it: captures the extent of elevated and undeveloped land that is in contiguous bush cover; excludes the elevated landform where quarrying activities are a prominent and dominant element; and aligns the ONL boundaries to generally follow the patterning of elevated contiguous bush areas.	No change to updated ONL mapping (January 2024) required.
S420.001 Raylene Black	Request property at 1976b Haast Jackson Bay Road to be removed from	ONL4	It is noted that this portion of the ONL 4 overlay was not considered in the Brown 2022 ONL Mapping Review Report. However the natural character mapping was reviewed in that	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
	Outstanding Natural Character and Outstanding Natural Landscapes overlays		<p>report with the subject site (and adjacent properties) excluded from the High and Outstanding natural character mapping.</p> <p>The updated ONL mapping (January 2024) has been amended to correspond to align with the natural character mapping amendments recommended in the Brown 2022 ONL Report.</p> <p>Having reviewed the updated ONL mapping (January 2024), the general extent and configuration of the ONL 4 mapping in the vicinity of Hannahs Clearing (and the submitter's land) is considered to be correct.</p> <p>For completeness, the level of modification on this property (and the neighbouring Rural Lifestyle zoned properties), the proximity to and consistency of character with the adjacent non-ONL area and the very limited scale of the Rural Lifestyle area adjacent the settlement means that it reads as part of the settlement and does not qualify as ONL.</p>	
S433 Stuart Marshall and Susan Gooch	Remove the ONL layer from Lot 2 DP324352, out at Lake Kaniere Road	ONL 22	Having reviewed the updated ONL mapping (January 2024), I note that no ONL overlay applies to this land.	No change to updated ONL mapping (January 2024) required.
S438.142 Manawa Energy Limited	Review and amend the mapping of the ONFL areas to accurately map these at an appropriate scale that can be applied at a site level, and to include review of all areas where the mapping follows arbitrary lines and not landform or landcover. Specifically review and amend map overlays applying to ONL 15, ONL 16, ONL 25 and ONL 27 generally to better follow landform and landcover, and specifically as follows:	ONL 15, ONL 16, ONL 25 and ONL 27	<p>The notified mapping of the ONLs 15, 16, 25 and 27 has been refined in the vicinity of many of the areas mentioned in the submission.</p> <p>Relying on the updated ONL mapping (January 2024), the general extent and configuration of the relevant ONL mapping is considered to be correct, however it is acknowledged that time has not allowed detailed field work to confirm this mapping.</p> <p>Relying on a desktop review, the scale of modification in 'reduced' and 'excluded' areas would appear to support their exclusion. It is however likely that the mapping of ONL 15</p>	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
	<ul style="list-style-type: none"> • ONL15: Koihahai/ Gillespies Point to Te Kohumarua Bluff: refine the ONL mapping around the eastern part of Lake Wahapo and the surrounding landforms, including the relationship with the Waitangitahuna River. • ONL25: Lake Kaniere: review the extent around the highly natural Kennedy Creek and its margins, the modified area of forestry around Blue Bottle Road to the south of the Kaniere Forks power station, the 'cut-outs' at Lake Kaniere and the inclusion of a large adjacent area of native bush along the ONL's north-western edges (near Blue Bottle Creek). • ONL27: Lower Taramakau River & Kawhaka Forest: reconsider the extent of inclusion of the Taramakau River; reconsider the extent of this ONL to the west, around the extensive wetland areas; to the north around Dillmanstown, Greenstone River/ Hokonui; and the margins of the Kumara Reservoir. A review of the ONL in relation to the Kapitia Reservoir is also required, notably along its northern boundary. 		<p>would benefit from minor refinement to remove plantation forestry along the edges of the overlay.</p> <p>The submitter is encouraged to provide detailed mapping of any refinements to the updated ONL mapping (January 2024) at the hearing for review by Council experts.</p>	
S439.008 Karen Lippiatt	Include Denniston Plateau in an ONL	Currently none	Having visited the area and read the 'Denniston Plateau' decision ([2013] NZEnvC 047), the general extent and configuration of the ONL overlay in the vicinity of the Denniston Plateau as mapped in the updated ONL mapping (January 2024) is considered to be correct. For completeness, the level of modification across the plateau means that, despite having high amenity values, historic heritage values and ecological values, the area does not	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
			satisfy the 'naturalness test' that is required for it to be assessed as an ONL.	
S443 Suzanne Hills	Revisit north boundary of ONL 44 and consider extending.	ONL 44 and ONL 46	Relying on the updated ONL mapping (January 2024), the general extent and configuration of the (revised) ONL 44 and ONL 46 mapping in the vicinity of Charleston is considered to be correct. In particular, the ONL captures the elevated and contiguous bush-clad land in the area, with the ONL boundary generally aligned to follow landform and/or bush edges.	No change to updated ONL mapping (January 2024) required.
S447.009, S447.008 Vance & Carol Boyd	Do not include the properties at Hannah's Clearing within the Outstanding Natural Landscape Overlay	ONL 4	<p>It is noted that this portion of the ONL 4 overlay was not considered in the Brown 2022 ONL Mapping Review Report. However the natural character mapping was reviewed in that report with the subject site (and adjacent properties) excluded from the High and Outstanding natural character mapping.</p> <p>The updated ONL mapping (January 2024) has been amended to correspond to align with the natural character mapping amendments recommended in the Brown 2022 ONL Report.</p> <p>Having reviewed the updated ONL mapping (January 2024), the general extent and configuration of the ONL 4 mapping in the vicinity of Hannahs Clearing (and the submitter's land) is considered to be correct.</p> <p>For completeness, the level of modification on this property (and the neighbouring Rural Lifestyle zoned properties), the proximity to and consistency of character with the adjacent non-ONL area and the very limited scale of the Rural Lifestyle area adjacent the settlement means that it reads as part of the settlement and does not qualify as ONL.</p>	No change to updated ONL mapping (January 2024) required.
S448 Mitchells 2021 Limited	That the ONL boundary line at Mitchells Lake Brunner be adjusted so that the proposed subdivision area of the Bush	ONL29	Relying on the updated ONL mapping (January 2024), the extent and configuration of the ONL 29 mapping near Lake Brunner Eco Lodge is considered to be technically correct. In	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
	Block, and the Forestry Lake Front Block (or at least the part of it to be developed) are outside the ONL. (refer submission for maps)		<p>particular, the ONL captures the elevated and contiguous bush-clad land in the area, with the ONL boundary aligned to follow landform and/or bush edges.</p> <p>The submission seeks that land is excluded on the basis of their intentions to expand the Lake Brunner Eco Lodge. Such an approach does not align with landscape assessment best practice which assesses the landscape 'as it is' (taking into consideration the 'existing environment') and does not include consideration of development that may or may not occur at some time in the future as a relevant part of landscape values.</p>	
S449.009 Totally Tourism Limited	Move the ONL boundary so that Lot 33 Deposited Plan 409401 at Donovan Drive Franz Josef does not have any ONL located on it.	ONL 14	<p>Relying on the updated ONL mapping (January 2024), Lot 33 Lot 33 Deposited Plan 409401 at Donovan Drive Franz Josef does not have any ONL overlay located on it.</p> <p>The updated ONL mapping (January 2024) has been aligned to follow the Open Space/General Rural zone boundaries in the vicinity of Donovan Drive and would benefit from realignment to follow a landscape boundary that derives from the patterning of landform, vegetation, and unmodified land in the area (and excludes the Settlement Zone).</p>	Minor refinement of the ONL 14 mapping in the vicinity Donovan Drive, Franz Joseph is recommended to follow a 'landscape' rather than a zone boundary.
S472 New Zealand Coal & Carbon Limited	Amend the Outstanding Natural Landscape overlay to exclude Roa Mining Company Ltd, Francis Mining Co. Ltd and New Creek Mining Ltd mining areas from the overlay	ONL41	<p>Relying on the updated ONL mapping (January 2024), the general extent and configuration of the ONL 41 mapping in the vicinity of the Paparoa Coalfield is considered to be correct.</p> <p>In particular, the ONL captures the elevated and contiguous bush-clad land in the area, with the ONL boundary generally aligned to follow landform and/or bush edges and exclude active mining areas.</p>	No change to updated ONL mapping (January 2024) required.
S481 Lynley Hargreaves	Amend the ONL boundary to reflect the on the ground landscape values at Ross	ONL22	<p>Relying on the updated ONL mapping (January 2024), the extent and configuration of the ONL 22 mapping near Ross has been amended and is considered to be generally correct.</p> <p>In particular, the ONL captures the elevated and contiguous</p>	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
			<p>bush-clad land in the area, with the ONL boundary aligned to follow landform and/or bush edges.</p> <p>While areas of modification (i.e. limestone quarry and disused mine) are included within the updated ONL mapping (January 2024) near the rehabilitated gold mine, these are relatively discrete landscape elements that do not appear to influence the impression of the ONL from Ross, nor do they appear to be of a scale that dominates the landscape character of the ONL.</p>	
S488 West Coast Regional Council	Remove the Outstanding Natural Landscape ONL54 Overlay from the private property - Section 27, Block XV, Oparara SD, Valuation No 18780/234.00, subject to agreement by the landowner	ONL 54	Relying on the updated ONL mapping (January 2024), the general extent and configuration of the ONL 54 mapping near the private property - Section 27, Block XV, Oparara SD, Valuation No 18780/234.00, is considered to be correct. In particular, the ONL captures the elevated and contiguous bush-clad land in the area.	No change to updated ONL mapping (January 2024) required.
S506 Claire & John West and others	Pull the overlays back to the boundary of the Point Elizabeth Heights subdivision at Cobden to where it abuts the Rapahoe Scenic Range Reserve.	ONL 31	<p>The notified mapping of ONL 31 has been amended in the updated ONL mapping (January 2024).</p> <p>Relying on the updated ONL mapping (January 2024) and field work, it is recommended that the extent and configuration of the ONL 31 mapping near Point Elizabeth Heights subdivision is realigned to exclude the patterning of dwellings and built modification across the lower slopes on the western side of the Rapahoe Range landform. However, the realigned ONL should capture the elevated contiguous bush areas that sit above the dwellings that is on private land.</p>	Minor refinement of the ONL 31 mapping to exclude the patterning of dwellings throughout the lower slopes on the western side of the Rapahoe Range and include the elevated and contiguous bush area that sits above the dwellings.
S515 Russell Robinson	Amending the location of the Outstanding Natural Landscape Boundary identified on the notified TTPP, to more accurately reflect the forest vegetation cover associated with the reserve and Arnold	ONL 29	<p>The notified mapping of ONL 29 has been amended in the updated ONL mapping (January 2024).</p> <p>Relying on the updated ONL mapping (January 2024), the general extent and configuration of ONL 29 near the Arnold River (adjacent Arnold Valley Road) is considered to be</p>	Minor refinement of the ONL 29 mapping to exclude grazing land.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
	River environment located to the west of the site, (including consequential amendments to the adjoining sites to better reflect the amended boundary). A proposed amended Outstanding Natural Landscape boundary is included in a map in the submission.		generally correct. However, it would benefit from minor refinement to align the ONL boundary with the edge of contiguous bush cover so that the grazing land is excluded.	
S535 Neil Mouat	Outstanding Natural Landscape has been incorrectly mapped in relation to our property (4224 State Highway 6, Punakaiki).	ONL 44	Relying on the updated ONL mapping (January 2024) and field work, the general extent and configuration of the ONL 44 mapping at, and in the vicinity of, 4224 SH 6 Punakaiki, is considered to be correct. In particular, the ONL captures the elevated and contiguous bush-clad land in the area (and on the site), with the ONL boundary aligned to follow landform and/or bush edges.	No change to updated ONL mapping (January 2024) required.
S536 Straterra	Review boundary of overlay to exclude Rapahoe Coal Yard	ONL 43	The submission relates to the natural character overlays rather the ONL overlays.	No change to updated ONL mapping (January 2024) required.
S542 A & S Marshal	Remove the Outstanding Natural Landscape from Section 8 Town of Weld at Bruce Bay	ONL 10	Relying on the updated ONL mapping (January 2024), the general extent and configuration of the ONL 10 mapping at Bruce Bay is considered to be correct. In particular, the ONL captures the contiguous bush-clad land and undeveloped river flats in the area, with the ONL boundary aligned to follow watercourse and/or bush edges. For completeness, the ONL 10 mapping includes the submitter's land due to the similarity of this land to its surrounds, along with the very limited extent of development that might be anticipated in the area as a consequence of the zoning and lot arrangement in the vicinity, which means that the local area does not qualify for exclusion from the ONL on the basis of a dominant patterning of built modification.	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
S556 Paul & Barbara Dunn, Helen & Steve Boon, Ian & Lynley Preston, Jane & Mike Rogers	Remove the Outstanding Natural Landscape from the property at 31 Hans Bay Road, Arahutika, Lake Kaniere - Lots 1 and 2 DP 55403	ONL 25	Relying on the updated ONL mapping (January 2024), the general extent and configuration of ONL 25 on and around 31 Hans Bay Road is considered to be correct. In particular, the ONL captures the elevated and contiguous bush-clad land in the area (and on the site).	No change to updated ONL mapping (January 2024) required.
S570 Dean Van Mierlo	Amend the maps to remove the "Outstanding Natural Landscape" from the eastern/upper part of Lot 2 DP 307444, Blk V Brighton SD.	ONL 44	Relying on the updated ONL mapping (January 2024) and field work, the general extent and configuration of ONL 44 in the vicinity of Pahautane (and on the eastern/upper part of Lot 2 DP 307444, Blk V Brighton SD) is considered to be correct. In particular, the ONL captures the elevated and contiguous bush-clad land in the area (and on the submitter's land). For completeness, the updated ONL Mapping (January 2024) excludes the parts of the local area where dwellings and other modifications are a dominant landscape element as a consequence of their spatial arrangement, scale, and/or prominence.	No change to updated ONL mapping (January 2024) required.
S572 Jon Barltrop and others	Amend Outstanding Natural Landscapes with a view to the boundaries being shifted to South of the stand of Pine trees, to allow us to use our usable portion of our land. 5186 State Highway 6 Fox River	ONL 44	The notified mapping of ONL 44 has been amended in the updated ONL mapping (January 2024). Relying on the updated ONL mapping (January 2024), the general extent and configuration of ONL 44 in the vicinity of Pahautane, including on the submitters' land, is considered to be correct. It is noted that the ONL line has been amended to exclude the stand of pine trees on the submitters' land.	No change to updated ONL mapping (January 2024) required.
S575 Amanda Jenkins	Amend the ONL (Outstanding Natural Landscape) boundary at 5263 State Highway 6, Fox River	ONL 44	Relying on the updated ONL mapping (January 2024) and field work, the extent and configuration of ONL 44 in the vicinity of Pahautane (and on 5263 SH6, Fox River) is considered to be correct. In particular, the ONL in the vicinity of, and including, the submitter's land (on the western side of SH 6), captures the	No change to updated ONL mapping (January 2024) required.

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
			elevated and contiguous bush-clad land where dwellings and other modifications are not a dominant landscape element as a consequence of their spatial arrangement, scale, and/or prominence.	
S581 David Ellerm	Amend map boundary of the Outstanding Landscape Map as described in Schedule Five: the Iveagh Bay Ngāi Tahu Development boundary	ONL 29	Relying on the updated ONL mapping (January 2024) and field work, the general extent and configuration of ONL 29 in the vicinity of Iveagh Bay is considered to be correct. In particular, the ONL captures the contiguous bush-clad land in the area (and on the site), with the ONL boundary aligned to generally follow the patterning of the more elevated and undeveloped bush-clad landforms.	No change to updated ONL mapping (January 2024) required.
S599 WMS Group (HQ) Limited and WMS Land Co. Limited	Remove the Outstanding Natural Landscape overlay on the planning maps from Lot 1 Deposited Plan 3854 and reflect any consent decisions for this parcel of land when making decisions on the ONL boundary.	ONL26	The notified mapping of ONL 26 has been amended in the updated ONL mapping (January 2024). Relying on the updated ONL mapping (January 2024), the general extent and configuration of ONL 26 in the vicinity of Lake Mahinapua is considered to be generally correct. However, it would benefit from minor refinement to align the ONL boundary with the edge of contiguous bush cover near Ruatapu Road so that the grazing land is excluded.	Minor refinement of the ONL 26 mapping to exclude grazing land and plantation forestry areas around the edges of the ONL.
S620.158 Te Rūnanga o Ngāi Tahu, Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio	That the ONL/ONF overlay is removed from sites which are used for plantation forestry, including but not limited to: Lot 1 DP 3156 (between Hokitika and Ross) ONL 22 Site between Waitaha River and Poerua River ONL 17 Lot 1 Deposited Plan 3135 (near The Forks) ONL 15 Site between Lake Hochstetter and Lake Haupiri ONL 32	ONL 15, ONL 17, ONL 22, ONL 32, ONL 33	Relying on the updated ONL mapping (January 2024), it would appear that parts of these sites that coincide with an ONL overlay are in extensive plantation forestry, which in turn is located at the edge of a mapped ONL. It is recommended that the ONL mapping is amended to remove the plantation forestry portions of these sites, with the revised ONL boundary configured to follow a legible landform and/or contiguous bush boundary. The exception to this is Lot 1 DP 3156 (between Hokitika and Ross) in ONL 22 which appears to be in contiguous bush cover. The general extent and configuration of the updated	Change to updated ONL mapping (January 2024) required so that areas of pine plantation on the following properties are excluded from the ONL mapping: Site between Waitaha River and Poerua River that coincides with ONL 17 Lot 1 Deposited Plan 3135 (near The Forks) ONL15

Original Submission Number and Name	Location and Issue	ONL Reference	BGLA Comments	BGLA Recommendation
	Lot 1 Deposited Plan 15307 (on the Lewis Pass Highway) ONL 33.		ONL mapping (January 2024) mapping for this area is considered to be correct.	Site between Lake Hochstetter and Lake Haupiri ONL32 Lot 1 Deposited Plan 15307 (on the Lewis Pass Highway) ONL33.

5.0 Recommendations

5.1 For the reasons set out earlier, I recommend the following amendments to the notified ONL Mapping and Schedules:

- f) Reference to the SASMs that coincide with ONLs are included in the relevant ONL Schedule.
- g) Any more detailed evidence with respect to tāngata whenua values for ONL areas provided by submitters during the hearing process is incorporated in the relevant ONL Schedule text.
- h) Clear guidance is included in the TTPP (perhaps by way of a Preamble to TTPP Part 4: Schedule Five: Outstanding Natural Landscapes), that explains:
 - iv. the reasonably high-level nature of the ONL Schedules;
 - v. that the landscape values identified relate to the ONL as a whole, rather than specific sites; and
 - vi. that other landscape values may be identified as part of an application-specific landscape assessment, including landscape modifications that are an accepted part of the landscape (e.g. infrastructure, buildings) and more negative landscape attributes (e.g. pests).
- i) The updated ONL mapping (January 2024) is carefully reviewed by a landscape/GIS expert to ensure:
 - iv. the following areas are excluded from the mapped ONLs:
 - Sizeable pastoral areas.
 - Sizeable plantation forestry areas, particularly on the edges of ONLs.
 - Areas where the arrangement, scale, and/or prominence of built development exerts a dominant influence on landscape character.
 - v. ONL linework is 'clipped' to obvious landform and or contiguous native vegetation cover edges in the immediate vicinity of the mapped ONL.
 - vi. the mapping of the southern end of ONL 5 is amended to extend to the district boundary.
- j) In response to location specific ONL submissions, the following mapping amendments are recommended:
 - vi. Minor refinement of the ONL 14 mapping in the vicinity Donovan Drive, Franz Joseph is recommended to follow a 'landscape' rather than a zone boundary. (S449 Totally Tourism Limited.)
 - vii. Minor refinement of the ONL 31 mapping to exclude the patterning of dwellings throughout the lower slopes on the western side of the Rapahoe Range and include the elevated and contiguous bush area that sits above the dwellings. (S506 Claire and John West and others.)
 - viii. Minor refinement of the ONL 29 mapping to exclude grazing land. (S515 Russell Robinson.)
 - ix. Minor refinement of the ONL 26 mapping to exclude grazing land and plantation forestry areas around the edges of the ONL. (S599 WMS Group (HQ) Limited and WMS Land Co. Limited.)

- x. Refinement of the updated ONL mapping (January 2024) so that areas of pine plantation on the following properties are excluded from the ONL mapping:
- Site between Waitaha River and Poerua River that coincides with ONL 17
 - Lot 1 Deposited Plan 3135 (near The Forks) ONL15
 - Site between Lake Hochstetter and Lake Haupiri ONL32
- (S620.158 Te Rūnanga o Ngāi Tahu, Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio.)

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