

BEFORE THE HEARINGS COMMITTEE

IN THE MATTER

**of hearings on
submissions concerning
the proposed One Plan
notified by the
Manawatu-Wanganui
Regional Council**

**SECTION 42A REPORT OF CLIVE ANSTEY
ON BEHALF OF HORIZONS REGIONAL COUNCIL**

INTRODUCTION

My qualifications/experience

1. I have 40 years experience in land use planning, management and design. Most of this has been associated with forestry – exotic and indigenous. For 12 years I held a national brief with the NZ Forest Service managing a planning and design team. I later spent six years as planning manager for Department of Conservation (DoC), also with a national brief. Since leaving DoC in 1997 I have operated as an independent consultant but have frequently worked with other specialists, notably ecologists and social scientists. During the past six years I have been engaged in a number of projects dealing with reserves planning, public open space, rural subdivision (five in the Manawatu), and wind farm proposals (three on the Tararua Ranges). For the past three years I have been part of a team exploring science (information) transfer to farmers on sustainability issues. We have interviewed some 120 farmers across New Zealand, as well as people from regional and district councils, DoC, Landcare Trust, and other relevant NGOs. I am currently working in a team developing landscape management provisions for Porirua City. I have also been involved in Greater Wellington Regional Council's Draft Regional Policy Statement, commenting on both landscape provisions and the overall plan structure. For the past three years I have taught *Landscape Planning in the Context of Legislation* to third year landscape planning and design students at Victoria University. I believe I have the experience and qualifications to assist in the clarification and development of the landscape provisions in the One Plan.

Full name: Clive Anstey
Present position: Landscape and Resource Planner
Present employer: Self Employed Consultant
Present work address: 75 Te Anau Road, Hataitai, Wellington.

Academic qualifications:

B.Sc. (Major in Zoology) Victoria University, 1966
B.Sc. (Forestry) University of Aberdeen, 1968
Dip. Landscape Architecture (post grad) Lincoln University, 1975.

Years as a practising land use and resource planner: 40 years

Track Record

<i>Area of Work</i>	<i>Principal outcome</i>	<i>Principal end user and contact</i>
Land-use planning in Otago. Afforestation opportunities and economic evaluations. Land purchase. Technical forestry	Assisting in the planning and development of the exotic forest estate in Otago.	NZ Forest Service/Farm Foresters. Catchment Boards
National overview: Landscape and forestry Forest recreation planning	Integration of forest development. Improved design in recreation facilities.	NZ Forest Service Ministry of Works Lands & Survey
Regional Manager – Canterbury and Otago	Forest policy information transfer consultancy	Forest Growers Forest Industry
National Manager – Resource planning	Conservation strategies RMA advocacy	Department of Conservation
Consultant	<ul style="list-style-type: none"> o Reviews of reports – land-use/wind farming o Facilitation of seminars o Information transfer o RPS review (Landscape) o Landscape provisions o Wind farms (6) o Rural subdivisions (7) o Forestry standards o Reserves Management o Urban subdivision/design 	Parliamentary Commissioner for the Environment. Department of Conservation MAF GWRC Porirua City Council WCC, PNCC, Community Various council/applicants Forest Stewardship Council WCC Various

Membership of societies, institutions, committees:

NZ Institute of Landscape Architects; Fellow and registered consultant.

- Two terms on Institute Executive
- Four years on Associate Accreditation Committee

NZ Institute of Forestry; Full member.

- Organising committee for two conferences (2006/2008)

Certified Commissioner (completed the *Making Good Decisions* training in 2005)

Personal Focus: Integrated land management – aligning cultural and ecological values to create sustaining landscapes.

2. I have read the Environment Court's practice note 'Expert Witnesses – Code of Conduct' and agree to comply with it.

My role in the One Plan

3. I have been asked to provide expert evidence on the landscape provisions as set out in the Proposed One Plan, to provide advice on responses to submissions, and to recommend a way forward. I have read submissions and have attended pre-hearing meetings with community groups and representatives of the energy companies who made submissions to the Proposed One Plan.

Scope of evidence

4. My evidence will cover:
 - The existing provisions as they relate to landscape matters.
 - Key issues raised in submissions.
 - The need for a consistent approach across the Region.
 - Recommendations to improve clarity and certainty.

EXECUTIVE SUMMARY OF EVIDENCE

5. I am generally familiar with the area covered by the Proposed One Plan, the Manawatu-Wanganui Region.
6. I have, at some time, visited all of the areas shown on the maps in Schedule F of the Proposed One Plan but am unable to comment at the detailed level of boundaries. Most of the areas listed as *Outstanding Natural Features or Landscapes* in Schedule F are designated conservation land. Areas listed that are not conservation land are of a similar character or have high scenic value and/or special and unique landforms (for example the Rangitikei River). In my view all of the areas scheduled as *Outstanding Natural Features or Landscapes* would satisfy the criteria generally accepted by the Environment Court as 'outstanding', although some boundaries may be more indicative than precise. It is therefore my view that a systematic landscape assessment would confirm the scheduled landscapes as outstanding at a regional level but there would be some boundary refinements. Many of the scheduled outstanding natural features and landscapes would undoubtedly qualify as nationally outstanding. A systematic assessment would enable this to be confirmed and would enable refinement of the boundaries.
7. A number of submissions noted that the terminology was not consistent through the Proposed One Plan and that there were difficulties reconciling its provisions with those of

the 1998 Regional Policy Statement. Tables in Schedule F of the Proposed One Plan identify areas that are *Outstanding Natural Features or Landscapes* and then on the supporting maps describe these areas as *significant landscape*. As the intent is to describe and locate on maps *outstanding natural features and landscapes* (section 6(b) of the Resource Management Act 1991) then the words in the Act should be consistently used.

8. The *skyline* was defined precisely in the 1998 Policy Statement as *the boundary between the land and the sky at the crest of the highest points along the ridge. The skyline of the Tararua Ranges is the land/sky boundary as viewed at a sufficient distance from the foothills so as to see the contrast between the solid nature of the land at the crest at the highest points along the range and the sky.* In the Proposed One Plan the characteristics/values of the skylines of the Kaimanawa, Ruahine, and Tararua Ranges are listed as *Visual and scenic characteristics, particularly (its) prominence throughout much of the Region and (its) backdrop vista in contrast to the Region's plains.* In the Proposed One Plan the maps clearly show more than just the top ridges; the skyline is an important feature of *Outstanding Natural Features and Landscapes* but not the only feature in the visual and scenic character and prominence of the ranges. In my view the 1998 definition is too limiting and the Proposed One Plan more usefully reflects the intent to recognise the visual and scenic importance of prominent landforms that are outstanding, particularly as seen on the skyline.
9. Broadly speaking, the energy companies' submissions requests that the constraining provisions of skylines and outstanding natural features and landscapes be removed from the Proposed One Plan, while the submissions of many individuals and community groups want additional areas and skylines recognised as outstanding natural features and landscapes. In my opinion, apart from the alterations I discuss in paragraphs 36 to 40, any additions or removals would do little to assist the cause of either the community or the energy companies' without proper landscape assessments and a process of informed consultation to ascribe values to the districts', and ultimately the Region's, landscapes. Such assessment would include the landward side of the coastal environment. Only with a comprehensive understanding of the regions landscapes and the ways in which communities relate to and value them can we begin to establish any sense of their relative importance and vulnerability. Accordingly, it is my view that all of the Schedule F areas should be retained as presented in the Proposed One Plan (with minor modifications as described below) until comprehensive landscape assessments and evaluations have been carried out by the Region's Territorial Authorities.
10. The proposed New Zealand Coastal Policy Statement 2008 would require local authorities to *assess the natural character of the coastal environment of the region or*

district and provide for its preservation, including by provisions in policy statements and plans that address the national priorities the statement sets out (proposed Policy 36). The preservation of the natural character of the coastal environment would require, under the proposed statement, *the protection of outstanding natural features and landscapes* within that environment (proposed Policy 32). An earlier policy (proposed Policy 14) would require policy statements and plans to identify where, in the coastal environment outside the coastal marine area, subdivision and the development of subdivided land to provide dwellings or commercial premises would be appropriate. It would also require the identification of areas where development of specified types would not be appropriate. The proposed NZ Coastal Policy Statement sets out to impose a greater degree of rigour in the management of the coastal environment and provide clearer direction to future development and use. The proposed statement is currently being considered by a Board of Inquiry so is not finalised. Regardless of the final form of the statement, it is my view that the coastal environment should be included in assessments carried out by territorial authorities. It is my further view that the One Plan needs to provide clear policies and methods to address the management and protection of landscape values as a matter of urgency.

11. The outline of an approach to landscape assessment is provided in paragraphs 53 to 59 of my evidence. The criteria included there are those accepted by the Environment Court. The importance of engagement with land managers, tangata whenua, communities, and interest groups is stressed. Ideally each district should undertake an assessment of their area of responsibility in accordance with a consistent methodology and criteria. The One Plan can assist by setting out the criteria to be consistently applied in such landscape assessments. The Regional Council should also provide mapped resource information covering the Region, or prescribe national resource data sets to which districts have access. The objective would be to ensure a consistent approach across the Region so that comparisons of relative landscape values can be made. The Regional Council could be involved in the process of assessment and evaluation to the extent necessary to engage in decisions as to whether natural features and landscapes are outstanding at a district or a regional scale.

12. It is relevant to note that Palmerston North City Council commissioned a landscape assessment in 1990, before the RMA was passed into law. This assessment, undertaken by Boffa Miskell¹, defined '*Landscape Character*' areas, assessed '*Landscape Quality*' and '*Landscape/Visual Sensitivity*', and formulated '*Landscape Guidelines*' as the basis for policies for *the protection, conservation, development and management of the area*'. A map produced by Boffa Miskell during that assessment is attached to this report. The

¹ Kairanga Section Landscape Assessment; Boffa Miskell Partners in Association with Palmerston North City Council; November 1990.

assessment identified eight landscape policy/management areas. The report's recommendations are referred to later in my evidence.

13. The recommendations of the Boffa Miskell report were not incorporated into statutory planning provisions at that time. However, in late 2007 Palmerston North City Council initiated a further landscape assessment of its district. The purpose of this assessment is to better respond to the requirements of the RMA. This assessment is providing the opportunity for community groups to advocate for *outstanding natural features and landscapes* in the places that are important to them as well as to identify amenity values to be provided for in the district plan. Horowhenua District Council is also in the process of carrying out a comprehensive assessment of its landscapes and their values.

EVIDENCE

The existing provisions as they relate to landscapes

14. Outstanding natural features and landscapes are generally described as memorable, affording aesthetic pleasure and experiences that are shared and valued by the wider community. Outstanding natural features and landscapes have natural and cultural dimensions that are central to our identity and our sense of belonging; they are places that reveal our history and provide a coherence and connectedness in our lives through time and space. Most of the areas listed as *Outstanding Natural Features or Landscapes* in Schedule F are designated conservation land, or private land with a similar character. In my view all of the areas scheduled as *Outstanding Natural Features or Landscapes* would satisfy the criteria accepted by the Environment Court. It is my further view that a comprehensive landscape assessment would confirm that the scheduled features and landscapes are outstanding at a regional scale. Some boundaries are clearly cadastral rather than topographical and do not reflect natural patterns. Without the benefit of a comprehensive landscape assessment I am not able to confirm that the boundaries shown on maps are accurate. Some of the scheduled items are undoubtedly nationally outstanding.

The history of areas currently scheduled in the Proposed One Plan

15. Lands now administered by the Department of Conservation (DoC) were formerly managed by either the Department of Lands and Survey (national parks and reserves) or the NZ Forest Service (initially production and protection forests, most of which became forest parks under NZFS administration). Over time National Parks and Reserves have been identified and protected for a wide range of values. Tongariro National Park, established in 1887 as New Zealand's first (and the fourth in the world), now has World

Heritage status. The park is recognised for both its natural and its cultural values. Additions were made to Whanganui National Park in the late 1990s. For an area to qualify for national park status certain criteria must be met. These are set out in the Department of Conservation's General Policy and are informative in providing guidance on the values attaching to national park status:

- scenery of such distinctive quality that its preservation in perpetuity is in the national interest
- ecosystems or natural features so beautiful, unique or scientifically important that their preservation in perpetuity is in the national interest
- features which have no equivalent in an existing national park and which are so beautiful, unique or scientifically important that they should be protected in a national park
- natural, historical and cultural heritage
- representative of ecosystems, natural features and scenery types
- landscape units (areas that reflect natural boundaries and patterns)
- readily identifiable natural features

The General Policy accepts that proposed parks may contain modified areas which can be restored or are capable of natural regeneration, particularly if representative of ecosystems not adequately included elsewhere in a national park. The criteria are not dissimilar to those generally accepted as appropriate in the identification of '*Outstanding Natural Features and Landscapes*', a matter I will address later in my evidence. This should be no surprise as the authors of the Resource Management Act relied on existing resource management and protection legislation for many of their ideas and statutory provisions. There was also an expectation that the new legislation would be consistent with existing statutory provisions.

16. Areas formerly managed by the NZ Forest Service (and now within the conservation estate) were originally held by the Crown as a source of native timber (the more accessible areas) or were managed for their soil and water protection values. In either case they were areas that were unattractive for pastoral farming in the early stages of European settlement, as were most areas eventually designated as national parks and reserves. Protection forests were, as the designation implied, at the headwaters of catchments and covered most of the main ranges of the North and South Islands. The Tararua, Ruahine, and Kaimanawa Forest Parks are part of this continuum and are notable for their prominence and their remote, wilderness, character. They continue to play a vital role in protecting soil and water values and sustaining a supply of high quality water to land users and communities on both coasts of the lower North Island.

17. All areas within what is now the conservation estate are clearly important for their natural, economic, cultural, and scenic values. But are the areas of the conservation estate scheduled in the Proposed One Plan 'outstanding' in the context of the RMA? The Oxford English Dictionary defines 'outstanding' as *conspicuous, eminent, esp. by excellence*. As the remaining remnants of New Zealand's indigenous landscape they are at least *conspicuous*. Many are definitely *eminent (exalted, distinguished, remarkable in degree*; Oxford dictionary). Tongariro National Park has spectacular volcanic cones and Whanganui National Park has a remarkable river of great significance to the tangata whenua. The central spine of the North Island is a distinguishing feature of the lower North Island landscape. The prominence of the ranges, the cover of indigenous vegetation, and the mood changes with the weather make for a very significant landscape. The ranges are also absolutely central to the identity of the lower North Island and communities to the east and west. In my view the central spine of the lower North Island, most of which is now managed for conservation purposes, is an 'outstanding landscape' in terms of the RMA and in accordance with criteria accepted by the Environment Court.
18. The conservation estate quite clearly does not capture all of the Region's significant natural features and landscapes. The history of land protection has resulted in more remote, inaccessible, and generally inhospitable areas being captured in the conservation estate while the remainder of the landscape has been subject to development. Within these developed, for the most part pastoral, landscapes there are however features and remnants that define their character and identity and 'bind' the fragmented patterns of ownership into a more cohesive whole. Of particular significance are features and remnants immediately beyond the boundaries of the conservation estate that integrate the public and private domains into more coherent patterns. I understand that the Proposed One Plan has included such remnants and features in its schedule of '*outstanding natural features and landscapes*' because of their contribution to a broader integration and coherence.

Protection and sustainability

19. Regardless of the purpose for which land is held, whether for conservation or primary production, its sustainable management is critical. The objective of 'sustainable management' transcends the boundaries of ownership and use. The Resource Management Act is focused on the sustainable management of all resources in all places, regardless of the purposes for which land is held and the activities occurring on it. The protection of isolated fragments as representative samples of our heritage is no longer sufficient, and especially where such fragments are not in themselves able to be sustained. Their ongoing demise is likely to result in a wider collapse of ecosystems with further deterioration in the health of critical resources such as water and soil, along with

the quality and character of the landscape. It is my view that this outcome would not be consistent with sustainable management.

20. The most significant shortfall in the Proposed One Plan provisions is their failure to provide guidance on the sustainable management of landscapes and landscape features beyond those specifically identified in the Proposed One Plan. While the Proposed One Plan provides *objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance* (section 30 (b) of the Act), it does not include specific policies that seek to give effect to *The establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the natural and physical resources of the region* (section 30 (a) of the Act) in terms of its landscapes. The Proposed One Plan policies do however provide for the integrated management of the Region's soil, water and biodiversity values, and this will assist in achieving a greater sense of integration and coherence in the Region's landscapes.
21. In my view it is the 'landscape' that provides a summary expression of integrated management, inclusive of both resources and the environmental qualities that make places attractive for individuals and their communities. The landscape can be regarded as a resource to be sustainably managed like any other; to do otherwise would result not only in a loss in the quality of our lives, our collective sense of identity, wellbeing and belonging, but would also pose a material threat to our recreation and tourism industries. Many submitters, notably the Tararua-Aokautere Guardians, identified this shortfall in the existing provisions and requested additional areas for inclusion as *outstanding natural landscapes*. Their concern is that significant landscapes beyond those identified in the Proposed One Plan are being afforded no protection.
22. The concerns of the Tararua-Aokautere Guardians tended to focus on the Tararua-Ruahine Ranges. In Boffa Miskell's 1990 study the two areas for which greatest sensitivity was advocated were the '*Rural Protection*' area and the '*Rural/Conservation*' area. It is relevant to quote in full the guidance provided for these areas. For the *Rural Protection* area the report states. "*The area between the 100 metre contour and the visible ridge of the Tararua Range has been identified as an area requiring appropriate rural protection policies. The area is visually sensitive and it is an important landscape feature and backdrop to Palmerston North City. The hill-slopes are vulnerable to disturbance and all roads and tracks should be carefully controlled. Grazing is the predominant landuse and should as far as possible be continued. Forestry and wood lots are permissible but would need to be a controlled use so as to ensure that as far as possible plantings relate to and are sensitive to landforms rather than fence lines and*

cadastral boundaries. Rural/residential and lifestyle lot subdivision should be excluded or at least very carefully controlled.”

23. For *Rural/Conservation* the report says “*This policy area covers the Kahuterawa and Turitea Valleys neither of which are visible from the plains. Generally rural activities should continue with appropriate controls placed on the water catchment areas. Forestry would be a permitted use, however conditions or some form of control should be exercised. Recreation opportunities should be encouraged and policies developed that will ensure that long term opportunities are not precluded. The water catchment area of the Turitea Valley offers recreational opportunities which should be carefully looked into. Rural residential and lifestyle lots should not be permitted in the area.*” The map showing these areas is appended.
24. Although the 1990 report does not suggest that the areas described above, for which guidance is provided, are *outstanding* it never the less clearly recognises that these landscapes are important and vulnerable to inappropriate development and use. Subsequent to the 1990 study wind farming has become an established use on the Tararua-Ruahine Ranges, within the *Rural/Protection Area*. Built, approved, and proposed wind farms now cover virtually the whole of the ranges between the northern boundary of Tararua Forest Park and the southern boundary of the Ruahine Forest Park. Both forest parks are scheduled as *outstanding natural features and landscapes*. An attached map shows the location of existing and proposed wind farms. A series of maps is also appended to illustrate the topographical patterns of the ranges and highlight the issues raised by submitters.
25. Having considered the issues raised by submitters in discussion with Fiona Gordon, the approach Ms Gordon and I recommend is to retain the outstanding natural features and landscapes currently identified in the Proposed One Plan. We also recommend the insertion of additional policies and methods to provide direction to systematic landscape assessments and evaluations in accordance with a consistent process and criteria. Over time this should mean that landscapes and features would be assessed across all districts so that a full ‘inventory’ would be available and relative values properly established. Opportunity would be provided for community engagement in this process with an invitation to identify and advocate for landscapes and features of importance. I discuss in paragraphs 53 to 59 of this statement a methodology for achieving consistent landscape assessment. Until such a comprehensive assessment is completed the criteria proposed will assist in identifying important landscape values and any outstanding natural features and landscapes on a case by case basis.

26. One of the downsides of classifying landscapes is the often mistaken belief that some are more important than others, and that only the critical attributes of special landscapes need to be 'protected'. Although the RMA singles out *outstanding natural features and landscapes* as requiring protection as a matter of national importance in section 6 (b), the RMA also requires the sustainable management of all natural and physical resources in all landscapes. This means that the attributes of all natural and physical resources contributing to the character and quality of all of our landscapes need to be identified and considered in deliberations over appropriate management. The practical purpose of landscape assessment and classification is therefore to identify the critical attributes of all landscapes, and their sensitivities, that need to be managed. While the anticipated results of planning and policy may be the protection of our landscapes, achieving this requires clearly directed management. To afford protection to some landscapes and not to others would result in a continuing deterioration in the quality of the landscape as a whole; landscapes with character and quality would eventually exist only as increasingly isolated fragments. For much of the environment, 'landscape values' would not be sustained. In my opinion, the RMA framework in part seeks to address this fragmentation of resources and is the reason why *integrated management* is one of the core functions of regional councils (in section 30).

27. Of relevance to the topic of integration is a recently published paper on the management of 'significant indigenous biodiversity' under the RMA². The paper cautions against the continued focus on selective and 'representative' areas of indigenous vegetation at the expense of the wider and sustaining fabric of ecosystems. The authors of the paper say:

"Criteria adopted from the 1980s Protected Natural Areas Programme [PNAP] are inadequate to achieve the maintenance of biological diversity if ranking is used to identify only highest priority sites." And in their conclusion they say:

"In recognising few sites as significant by dint of having restrictive criteria, they (councils) are likely to promote ongoing, cumulative loss and simplification of the biological diversity that now remains in the landscape."

28. Boffa Miskell recognised a similar and related problem in the management of landscapes in their Banks Peninsula study³. In their introductory section they say:

"Rather than initially focus this study on the identification of special landscapes, for example outstanding landscapes, the approach has been to identify the values associated with all the Peninsula's landscapes."

² *Halting indigenous biodiversity decline: ambiguity, equity, and outcomes in RMA assessment of significance.* Walker; Susan et al. Landcare Research Dunedin.

³ Environment Court decision No. C 45/2008

29. Landscape and biodiversity management provisions share a similar statutory history. An ongoing resource management approach that simply ‘protects representative fragments’ of our biodiversity and our landscapes will not result in either indigenous species being sustained or environmental quality being protected.
30. The Environment Court endorsed the concerns expressed by Boffa Miskell in accepting provisions for all landscapes on Banks Peninsula. Potential conflicts are recognised and mechanisms proposed for their resolution on a case-by-case basis. The Court’s decision relating to the study commented that, “*the approach was robust and repeatable*”⁴ and that, “*the methodology was broad and robust*”.⁵
31. A number of submissions on landscape matters in the Proposed One Plan requested that the region’s landscapes should have a higher profile in the Plan. In defence of the proposed Plan it needs to be acknowledged that where action on the ‘Big Four’ is successful there will be an enhancement in the quality of the seen and experienced landscape. Improved soil and water management involves, in simple terms, more woody vegetation on steeper eroding slopes and in riparian areas. With the exclusion of grazing stock and the implementation of pest control, indigenous plants will naturally seed and regenerate. These outcomes will reinstate patterns of plants and natural processes that form the framework of attractive and sustaining landscapes. Social and cultural wellbeing are clearly linked with economic wellbeing in the statement of the Act’s purpose, and sections 5 and 6 list a number of matters relating to the landscape, environmental quality, cultural and heritage resources, and our relationships with these resources, including access to them. Resources provide for physical as well as emotional, cultural and spiritual needs. In my opinion, resource management must provide for this broader range of human needs in an integrated way; providing for physical needs should simultaneously have regard to emotional and spiritual needs.
32. While being supportive of submissions requesting a greater recognition of the landscape’s values I am of the view that this will come through a far more integrated approach to land management generally rather than through the simple recognition of ‘landscape’ as important only in some circumstances. The challenge for the management of ‘landscape values and environmental quality’ is to ensure their consideration in all resource management decisions. This is what the Act intends and is what the amendments to the Chapter 7 policies addressing landscape that are suggested in Fiona Gordon’s report seek to achieve.

⁴ Para 116 Environment Court decision No. C 45/2008

⁵ Para 122 *ibid*

Key issues raised in submissions

33. I have read all of the submissions and attended four pre-hearing meetings. The meetings provided an opportunity to listen to representatives of community groups as well as individuals from within communities, and representatives of energy companies. I am satisfied that I have clearly understood all of the concerns. It was agreed at pre-hearing meetings that the regional council would circulate a draft set of landscape evaluation criteria for comment, and that finally agreed criteria would be proposed for incorporation into the Proposed One Plan. The draft criteria were circulated and responses received from Mighty River Power, Trustpower, Meridian, and the Tararua-Aokautere Guardians. All of the comments were generally supportive of the criteria proposed and there were useful suggestions for improvement. These suggestions have been incorporated to the extent possible, without altering the stated intent. The Trustpower submission requested that the One Plan include direction on the landscape assessment and consultation process within which criteria would be applied. Reference was made to the Boffa Miskell approach in the Banks Peninsula study.
34. A number of submissions requested a clarification in the terminology used and a consistency in its use. The most significant of these related to the definition of 'skyline'. In the operative Regional Policy Statement (RPS) this definition is precise whereas in the Proposed One Plan the 'skyline' is defined as a particular feature of visual and scenic character that is prominent. The tables in Schedule F list 'Outstanding Natural Features and Landscapes' which are shown on supporting maps as 'Significant Landscape'. The maps clearly show the areas referred to in the tables and should be titled the same. Skylines are not specifically located on the maps so that all prominent skylines in the areas shown on the maps potentially contribute to the prominence of the ranges. Importantly, the skyline is not limited to the highest ridge. The implication is that any ridgeline when seen against the sky becomes a feature to be protected from inappropriate subdivision, use, and development. I support this more inclusive and flexible approach to skylines, an approach which acknowledges that the skyline moves with the viewer and many ridgelines in an outstanding landscape can assume particular prominence when seen against the sky. For the same reason, a number of ridgelines in an outstanding landscape may be 'outstanding natural features', not only the highest ridgeline.
35. A number of submissions requested that areas defined as outstanding natural features and landscapes be extended to include prominent landforms and skylines further north along the Tararua Ranges, as well as prominent landforms and skylines to the west of the currently defined area. Their objective in requesting this was to afford greater protection to landscapes closer to settled areas and to areas of importance to outdoor

recreation activities. While having some sympathy with the intent it is my view that adding additional areas would be unhelpful without the benefit of a more comprehensive landscape assessment. Without first identifying landscapes and natural features (and 'Amenity Landscapes') that are important across the districts within the Region it is impossible to establish relative significance and decide which landscapes should be added to those that are outstanding at a regional scale.

36. It is my view that the current acknowledgement of the skyline of the Tararua-Ruahine Ranges in the operative RPS as an outstanding feature should be carried over to the One Plan as an interim measure. I understand that this provision in the operative RPS has not been contested. I therefore endorse the approach proposed in Fiona Gordon's report which is to describe in words a specific item in Schedule F for the skyline of the Ruahine and Tararua Ranges as: *"The skyline of the Ruahine and Tararua Ranges' defined as the boundary between the land and the sky as viewed at a sufficient distance from the foothills so as to see the contrast between the sky and the solid nature of the land at the crest of the highest points along ridges. The skyline is a feature that extends along the Ruahine and Tararua Ranges beyond the areas mapped in Figures F:8 and F:9"*.
37. The assessment currently being undertaken by Palmerston North City Council is the first step in a process of refining the mapping of outstanding natural features and landscapes. It is relevant to point out that most of the Tararua-Ruahine ridgeline falls within the forest parks, ie. within scheduled outstanding natural features and landscapes. The only substantial section of the ridgeline that does not is between the northern end of the Tararua Forest Park and the Manawatu Gorge. The most significant landscape along this section sits between the Tararua Forest Park boundary and the Pahiatua Track. The elevation and vegetation cover is similar to that within the forest park. It is of a similar character. Not to recognise the significance of this section of the ridgeline would be inconsistent with the more general approach to delineating outstanding natural features and landscapes within the Proposed One Plan. Areas neighbouring DoC land that are of a similar character should be acknowledged as outstanding natural features and landscapes (as reflected in the area identified in Figure F:10). The current assessment being undertaken by the Council will provide the opportunity to explore the significance and extent of this section of the ranges, in particular whether or not it is only the ridgeline that is outstanding or whether a more extensive area of spurs and upper slopes should also be recognised as outstanding.
38. There were several submissions from landowners requesting boundary adjustments to exclude productive areas of their farms from areas mapped as outstanding natural features and landscapes. Pre-hearing meetings were held with these landowners. Tom and Linda Shannon own a property in the Manawatu Gorge and requested that a

pastured area be excluded from Figure F:10. A group of submitters with properties on the Manganui o Te Ao River made similar requests for their land. Sue and Gary Deadman and Winston Oliver attended a pre-hearing meeting requesting the removal of the Ruatiti Stream Catchment from Figure F:6 but accepted that along the Manganui o Te Ao River riparian areas, gorges and native remnants could be included.

39. The Regional Council staff at the meetings accepted that boundary adjustments needed to be made along the lines suggested and agreed to make these adjustments on any maps included in the final One Plan. These adjustments have been made and are shown in the maps attached to my evidence. Although it would have been preferable to treat these boundary changes as part of a wider assessment (the approach advocated in my evidence) it was clear that this particular group of landowners occupy a complex landscape within which natural and developed areas are intimately interwoven. Although much of the landscape retains an original and very natural character, and has outstanding natural features such as ridges, steeper areas and deeply incised water courses, there are considerable areas of pasture on the warmer slopes and flatter areas. The initial mapping was too coarse to differentiate these areas and a preliminary refinement of the boundaries seemed justified, as requested. I would have to concede that the new boundaries are still indicative but at least there is now a recognition of the farmed areas within what is more generally a fairly stunning landscape. Maps showing the recommended amendments to the Manganui o Te Ao Figure F:6 and to Manawatu Gorge Figure F:10 are attached to this report. Landowners were concerned about possible constraints on the management and use of their land within an outstanding natural landscape. It can be noted however that existing uses are accepted in outstanding natural landscapes and may even be important in sustaining their values. Only with a significant change in the use of land can constraints be imposed. This is because a significant change in land use would require a resource consent and the effects would be assessed in the context of the outstanding landscape.

40. A number of submissions oppose the inclusion of the Whakapapa River (Figure F:2). I have reviewed the map and the description of characteristics and values, although I have not been commissioned to undertake a detailed landscape assessment of the entire river corridor. I am however familiar with sections of the Whakapapa River and it is my opinion that it would qualify as outstanding in terms of a number of the accepted criteria. I therefore do not support its deletion from Schedule F. I do however support the removal from the mapped overlay of a specific area owned by the Sivyers, who submitted that their land sat outside the boundary of the outstanding landscape. A map showing the recommended amendments to the Whakapapa River Figure F:2 is attached to this report.

41. Submissions from energy companies expressed concerns about landscape provisions in the Figure F:10 One Plan constraining the development of renewable energy. My experience in dealing with resource consent applications for wind farms suggests that, on the Tararua Ranges at least, a better understanding of landscape values and their sensitivities to development would assist, rather than constrain, the consenting process. Currently assessments of landscape values are being undertaken on a case by case basis with the assessment of effects being made with reference to Part 2 of the Act. The geographic extent of assessments undertaken in support of resource consent applications is almost always limited (understandably due to time and costs) as is any consultation with local communities. Community responses to proposals have been reactive; communities have had limited opportunity to advocate for the landscape values they believe to be important; and cumulative effects (an increasing concern) are difficult to judge without an understanding of the broader landscape context and any future developments that might reasonably be expected to occur. Regardless of whether a district's or region's landscapes have been assessed prior to a proposal being developed and a resource consent application being lodged, in addressing Part 2 matters the applicant will be required to determine whether the subject landscape is outstanding.
42. Some of the energy companies requested that the One Plan provide the basis upon which outstanding features and landscapes had been identified. The criteria used to determine the areas in Schedule F are provided in the current RPS (Policy 8.1). These have not been carried over into the Proposed One Plan. The new criteria, set out later in my evidence, are essentially similar to those in the current RPS. Both sets of criteria align with those in the Department of Conservation's General Policy (cited above). So that all three sets of criteria can be compared, I set out here the criteria from the operative RPS:
- a. *With respect to major geographical and geological features or landscapes, the degree to which it contributes to the Region's character in terms of:*
 - i. *visual prominence; and*
 - ii. *scenic characteristics, including views, vistas and backdrops; and*
 - b. *the feature or landscape's ecological significance in terms of:*
 - i. *its importance as a habitat for rare or unique species; and/or*
 - ii. *its importance as an area of indigenous flora; and*
 - c. *the cultural or spiritual significance of the site or area to tangata whenua; and*
 - d. *special or important amenity and intrinsic values, including scientific, cultural and recreational values, of the area to the Region; and*
 - e. *the degree to which the feature or landscape has recognised national or regional protection.*

43. Submissions from Territorial Authorities (TAs) were in support of the provisions in the Proposed One Plan but requested clear direction on how outstanding natural features and landscapes were to be managed. The submissions tended to suggest Territorial Authorities recognised the need to better manage their landscapes and were looking to the Regional Council for guidance. The proposed criteria and amended policies set out in Fiona Gordon's report respond to these submissions. The commitment of TAs to comprehensive and consistent district-wide landscape assessment will be essential to enhanced landscape management.
44. A number of submissions asked for a more consistent approach to landscape management across the Region, stressing the importance of being able to compare and contrast the qualities of the Region's landscapes across territorial boundaries. A number of submitters requested that a consistent set of criteria be used in all assessments and some went so far as to suggest what these might be. Many of the criteria suggested by submitters are essentially those accepted by the Environment Court and proposed for inclusion in the revised One Plan. The use of a common set of criteria and an essentially similar approach to assessing the landscapes across the Region as a whole will ensure a consistency and enable qualitative comparisons to be made.

Coastal environment

45. A Department of Conservation submission requested the clarification of mapped boundaries in the coastal environment and identification of critical features. The department further requested clarification of the term 'natural character' and suggested that maps should indicate where natural character was to be preserved in the coastal environment and where further development might best be located. Ernslaw One Ltd also requested boundary adjustments to better provide for their forests in the coastal environment. Other submissions requested the refinement of the coastal boundaries or a reduction in the area mapped so as to more specifically pinpoint outstanding natural features and landscapes and coastal natural character.
46. Coastal resources have attracted particular attention under the Act in recognition of their importance to all New Zealanders. Coastal landscapes that remain predominantly natural, ie. have a strongly expressed *natural character*, are afforded high levels of protection. The New Zealand Coastal Policy Statement was developed to ensure a consistent approach to the management of our coastal environment. This is currently under review. The Proposed Coastal Policy Statement, currently with the Board of Inquiry, recognises the need for greater clarity and certainty, as requested by the Department of Conservation's submission on the Proposed One Plan. Under the Proposed NZCPS there is a requirement to recognise in plans and policy statements outstanding natural

features and landscapes, as well as a number of specified characteristics. Recognising areas where natural character predominates and cultural modification has been limited will be central to the process of assessment and evaluation proposed in my evidence. This approach is consistent with that adopted in the Banks Peninsula case.

47. The need for clarification in terminology used in the Proposed One Plan is accepted. The methods proposed by Fiona Gordon for landscape assessments will enable a more systematic analysis of coastal values and constraints, as requested. The preservation of the natural character of the coastal environment has proven to be problematic and hence the Proposed NZ Coastal Policy Statement's attempt to provide clearer direction on both how the natural character is to be assessed and how it is to be protected from inappropriate subdivision, use and development. The Environment Court has accepted that the 'natural' character of an environment is that dimension of its character which is an expression of nature, and that this is inclusive of both indigenous and exotic biota. Natural Character is generally accepted as being an expression of:

- Natural landform
- Natural water bodies; lakes, rivers, and the sea
- Vegetation cover; type and pattern
- Natural processes associated with the weather and the ecology
- Wildness, exposure, and the natural sculpturing of landforms and vegetation
- The wider landscape context and the site's relationship to this

48. The extent to which a 'natural character' predominates in a landscape can be established in a reasonably objective way. How strongly the natural character is expressed can also be generally agreed. Our indigenous nature tends to be expressed most forcefully in remote and inhospitable places where access is limited and cultural impacts are constrained. In ascribing value, the more subjective aspect of assessment, a higher value tends to be placed on a character dominated by indigenous nature and a lower value where exotic species occur. The Act clearly recognises that coastal environments with a predominantly natural character are a valued resource. Development must therefore recognise and protect the critical attributes that compose this natural character.

49. The areas within which a distinctly coastal natural character can be expected to occur are depicted on maps in Schedule F. As with most other mapped areas I cannot comment on the boundaries. I am aware from personal experience that the boundary of the coastal environment on the western side of the North Island is extremely difficult to determine and that little of the original 'indigenous' character remains, at least in anything like a pristine state. There are however significant natural features that, in spite of cultural impositions, continue to assert their character and confer identity. For example, there are

significant dune systems, dune lakes and coastal escarpments. Ideally Territorial Authorities should undertake assessments of their coastal environments as part of a district-wide process. One of the objectives would be to verify the boundary of the coastal environment. It is recommended that the criteria to be used in establishing the values of coastal landscapes be those proposed for establishing outstanding natural features and landscapes. The process of assessment within the coastal environment will establish areas where a natural character predominates. This is essentially what the Proposed NZ Coastal Policy intends. The approach makes sense regardless of whether the proposed policy statement is adopted.

The need for a consistent approach across the Region

50. Without the benefit of a district-wide assessment, judgements on a case by case basis will always be subject to challenge by the community and local residents, and will be contentious. Cumulative effects are extremely hard to assess unless there is some measure of human induced change in the landscape over time. That is: historic change as well as what might reasonably be expected in the future as a result of irreversible processes. Sustainable resource management is a worthy objective without substance unless we are able to monitor change over time and account for that change. Landscape change over time generally has been accepted as the inevitable consequence of changes in the use of resources. The measure of change, in so far as we have been aware of it, has tended to focus on discrete resources such as air, soil, water and vegetation, and has been quantitative. Changes in the quality of resources are a relatively recent concern. Addressing qualitative changes requires an understanding of processes and relationships. For example, what has changed in a catchment that has altered the quality of the water? Measuring qualitative changes in the landscape resource over time similarly requires the monitoring of changes in processes and relationships, and community responses to these changes. In practical terms this requires the documentation of changes in land use and the monitoring of community responses. The starting point is to map existing landscapes and engage with communities in establishing the values they attach to these landscapes, and how they see various land uses adding to or detracting from them. A consistent approach to the mapping of landscapes and the ways in which they are described is essential to establishing an objective overview of the various landscape character types and their extent. A consistent approach to consultation is similarly important to ensure, as far as possible, that the variation in responses reflects the variation in landscapes and communities, and not differences in approaches to consultation. It is also important to recognise that some individuals and groups will have a local perspective while others will have an interest in the regional landscape. How individuals see and experience a landscape depends on their relationship to that landscape; what does it mean to them and how attached to it are they?

Recommendations to improve clarity and certainty

51. It is recommended that the One Plan incorporates policies and methods to:
- Provide guidance on landscape assessment and evaluation.
 - Provide criteria to establish and assess particularly important or defining features and landscape attributes.
 - Make available to Territorial Authorities mapped resource information, or direct them to nationally accessible data bases, to ensure a consistency in describing resources across the Region. Without this there cannot be a consistent approach to assessment and evaluation across territorial, and ultimately regional, boundaries.
52. It is considered that the recommendation in paragraph 51 above will greatly assist in addressing a number of key submissions to the Proposed One Plan natural character and landscape provisions that requested:
- The inclusion of the criteria used to determine the proposed list of landscapes as outstanding, or an explanation thereof
 - The inclusion of the criteria to be used to identify outstanding natural features and landscapes in the future
 - Addition of sites or addition of characteristics/values relevant to outstanding natural features and landscapes listed in Schedule F
 - The extension or reduction of areas mapped in Schedule F
 - Inclusion of strong signals to TAs as to how to deal with outstanding natural features and landscapes
 - Clarification of how TAs are to provide for landscape protection in District Plans
 - Amendments to reflect areas that require protection under s6a natural character and s6b outstanding natural features and landscapes RMA.

Landscape assessment and evaluation

53. The process of documenting and assessing landscapes, including those on the landward side of the coastal environment, requires:
- a. A description** of the study area, supported by maps, covering:
- Land types
 - Geological patterns and features
 - Ecological regional and district information
 - Significant indigenous vegetation and habitats
 - River, lake and coastal environments
 - Elevation, slope and aspect
 - Soils and vegetation cover generally

- Biological/land use patterns
- A broad outline of key features

b. The delineation of 'Identity Areas' or 'Landscape Character Areas'. New Zealand's landscapes are extremely diverse and their character can change over relatively short distances. Identity areas may be defined in a number of ways but are generally thought of as distinctive areas with particular land use patterns and management needs (a catchment for example). Most 'identity areas' have discrete communities within them or may attract particular interest groups (National Parks for example).

c. Ascribing values to landscape features and attributes. Each of the Landscape Identity Areas or Character Areas is described and evaluated in accordance with criteria derived from the RMA and case law. For each identity or character area special features are recognised. For example:

- Geo-preservation sites
- Sacred, archeological and heritage sites
- Areas with important natural values

d. Consultation. Consultation associated with landscape assessment and evaluation has assumed increasing importance since the Act came into force. The interpretation of landscape matters set out in the Act can significantly influence the management, and therefore the quality, of the environment and people's lives. It is therefore important to ensure that the background to provisions in policy statements and plans is clearly understood and supported by communities. Such provisions should enable development that respects the environmental values the community regards as important, and constrains development that does not respect those values.

As a general rule, the approach to consultation has been:

- Start with tangata whenua and major landowners (or their representatives) to gain an understanding of cultural and land management issues, and possible constraints.
- Talk to key community groups in order to gain an appreciation of what is valued where people live, work and spend their leisure time.
- Provide a preliminary overview of the landscape and its values for the wider community to respond to and comment on.
- Delineate areas on maps that are outstanding natural features, outstanding natural landscapes, amenity landscapes, and note any special attributes and features.
- Develop draft planning provisions and invite comment.

- Go back to critical individuals and groups for their endorsement.
54. Policies and rules to provide direction to landscape management can only go so far. The Act's focus is on the effects of activities rather than the activities themselves; it is often not what is done but how it is done – its effects. Policies and rules may ensure that inappropriate activities are excluded from places where their effects are likely to be unacceptable. However, policies and rules are often not up to the task of ensuring that generally acceptable activities are planned and implemented in a way that minimises adverse effects. Guidelines can be extremely helpful in this regard. They can provide for a more nuanced process of analysis and deliberation that is responsive to the particular place and its values.
55. Guidelines can assist resource consent processes by listing criteria to assess landscape values and informing decision makers on the likely effects of development proposals. Each of the criteria can be defined as to meaning, followed by an explanation. Photographs can be used to provide local examples. Guidelines can be provided to cover a region, district, individual 'landscape units' or 'character areas', or individual sites. Guidelines can deal with the issue of scale where policies and rules are often written to operate regardless of scale.
56. Character or identity areas, although distinctive each in themselves, are set within the broader and unifying patterns of hills, waterways, lakes, wetlands, and the coastal edge. The sustainable and integrated management of the landscape therefore requires the recognition of values at two scales:
- At a district and/or regional scale. At this scale the unifying themes such as water and hills needs to be recognised. Values associated with these need to be affirmed by the wider district or regional community.
 - Within character areas. In addition to the unifying themes of water and hills there will be attributes that make each character area unique. 'Amenity' is likely to assume a greater significance and people living in a particular landscape will form special and unique relationships with it. Amenity and 'associative' values must be identified and affirmed by the communities who live and work within the landscapes that identity areas delineate.
57. All landscapes are assessed and evaluated according to criteria. Criteria accepted by the Environment Court are set out below. Landscapes and features with attributes and values described by the criteria will be identified. These landscapes and features will then be subject to a process of consultation and analysis to determine their status as either Outstanding Landscapes or Features, or Amenity Landscapes. Amenity Landscapes are those having high amenity value but failing to satisfy the more

comprehensive range of criteria to qualify as outstanding. In either case planning provisions must ensure that the critical attributes of these landscapes are protected. In the coastal environment the preservation of the natural character as well as the protection of Outstanding Natural Features and Landscapes, and Amenity Landscapes will require particular planning provisions.

58. Given that the Act's purpose is the sustainable management of all natural and physical resources, which in my view includes landscapes, the assessment of character and quality in all places and at all scales will greatly assist in achieving sustainable management. A landscape may be outstanding locally due to its significance within that context while being of a lesser significance within the wider district. Local recognition is important if the sustaining qualities of all places and communities are to be provided for.

Criteria for landscape evaluation⁶

59. For landscape evaluation the following criteria should be used:

(a) Natural Science Factors:	<p>These factors relate to the geological, ecological, topographical and natural process components of the natural feature or landscape:</p> <ul style="list-style-type: none"> (i) Representative: the combination of natural components that form the feature or landscape strongly typifies the character of an area. (ii) Research and education: all or parts of the feature or landscape are important for natural science research and education. (iii) Rarity: the feature or landscape is unique or rare within the district or region, and few comparable examples exist. (iv) Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.
(b) Aesthetic Values:	<p>The scenic values of a feature or landscape may be associated with:</p> <ul style="list-style-type: none"> (i) Coherence: the patterns of land cover and land use are largely in harmony with the underlying natural pattern of landform and there are no, or few, discordant elements of land cover or land use. (ii) Vividness: the feature or landscape is visually striking,

⁶ C180/99 Wakatipu Environmental Society Inc V Queenstown Lakes D.C. Modified version of the Pigeon Bay criteria accepted by the Environment Court as suitable for the assessment of all landscapes.

	<p>widely recognized within the local and wider community, and may be regarded as iconic.</p> <p>(iii) Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and land cover are an expression of natural processes and intact healthy ecosystems.</p> <p>(iv) Memorability: the natural feature or landscape makes such an impact on the senses that it becomes unforgettable.</p>
(c) Expressiveness (legibility):	The feature or landscape clearly shows the formative natural processes and/or historic influences that led to its existing character.
(d) Transient Values:	The consistent and noticeable occurrence of transient natural events, such as daily or seasonal changes in weather, vegetation or in wildlife movement, contributes to the character of the feature or landscape.
(e) Shared and Recognised Values:	The feature or landscape is widely known and is highly valued for its contribution to local identity within its immediate and wider community.
(f) Cultural and Spiritual Values For Tangata Whenua:	Maori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.
(g) Historical Associations:	Knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape.

Recognising and providing for Natural Character

60. In the coastal environment, wetlands, lakes and rivers and their margins the preservation of the natural character and the protection of them from inappropriate subdivision use and development is a matter of national importance. A first step in providing for the preservation of natural character is to identify features and landscapes that are outstanding, and amenity landscapes. The level of protection afforded to these landscapes will depend on the degree to which their natural character predominates.
61. Case law and professional practice is constantly evolving. The procedures and criteria outlined above will need to be modified in accordance with such changes.

Clive Anstey

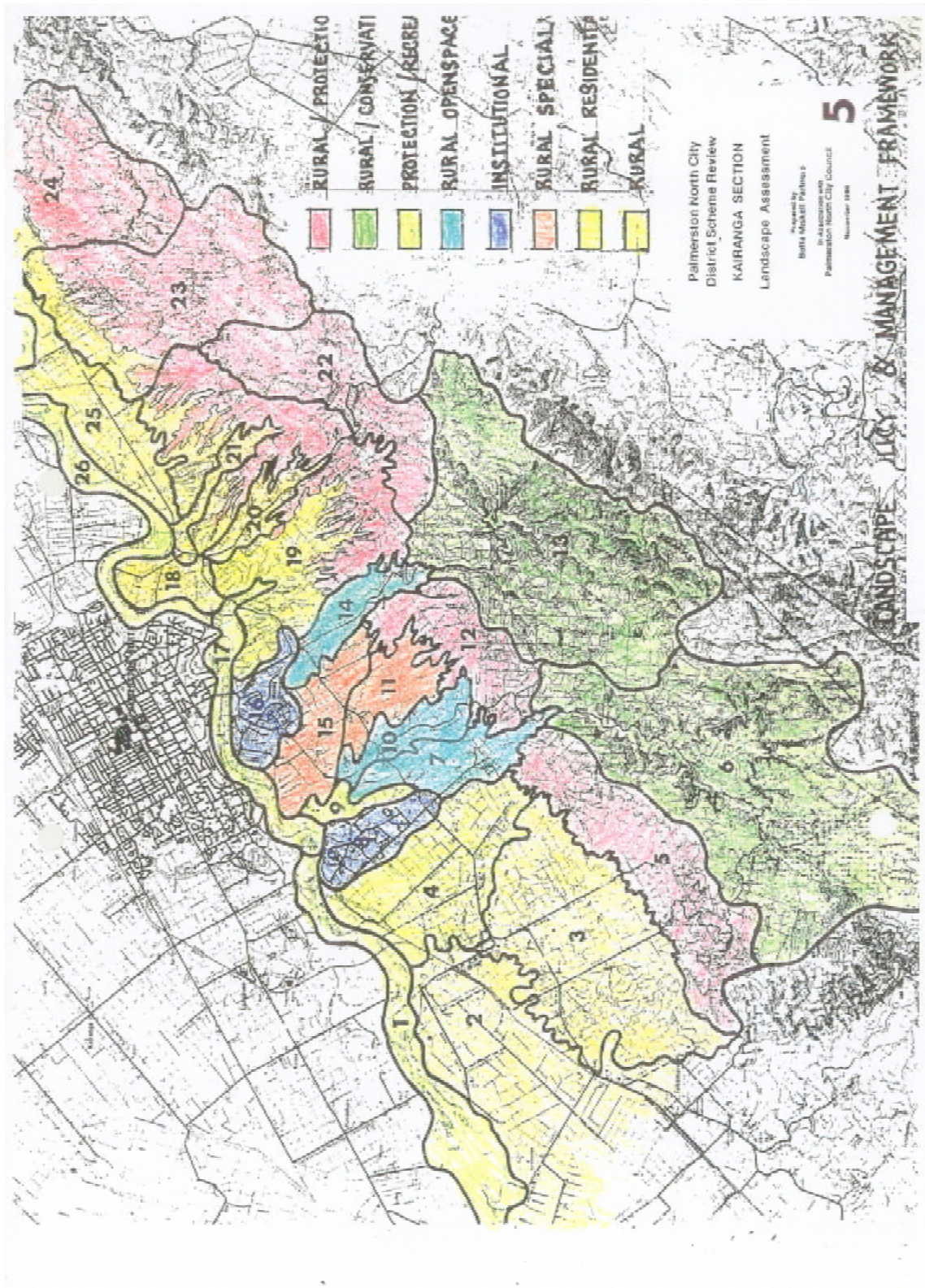
Attachments:

Attachment 1: Map from the 1990 Boffa Miskell study.

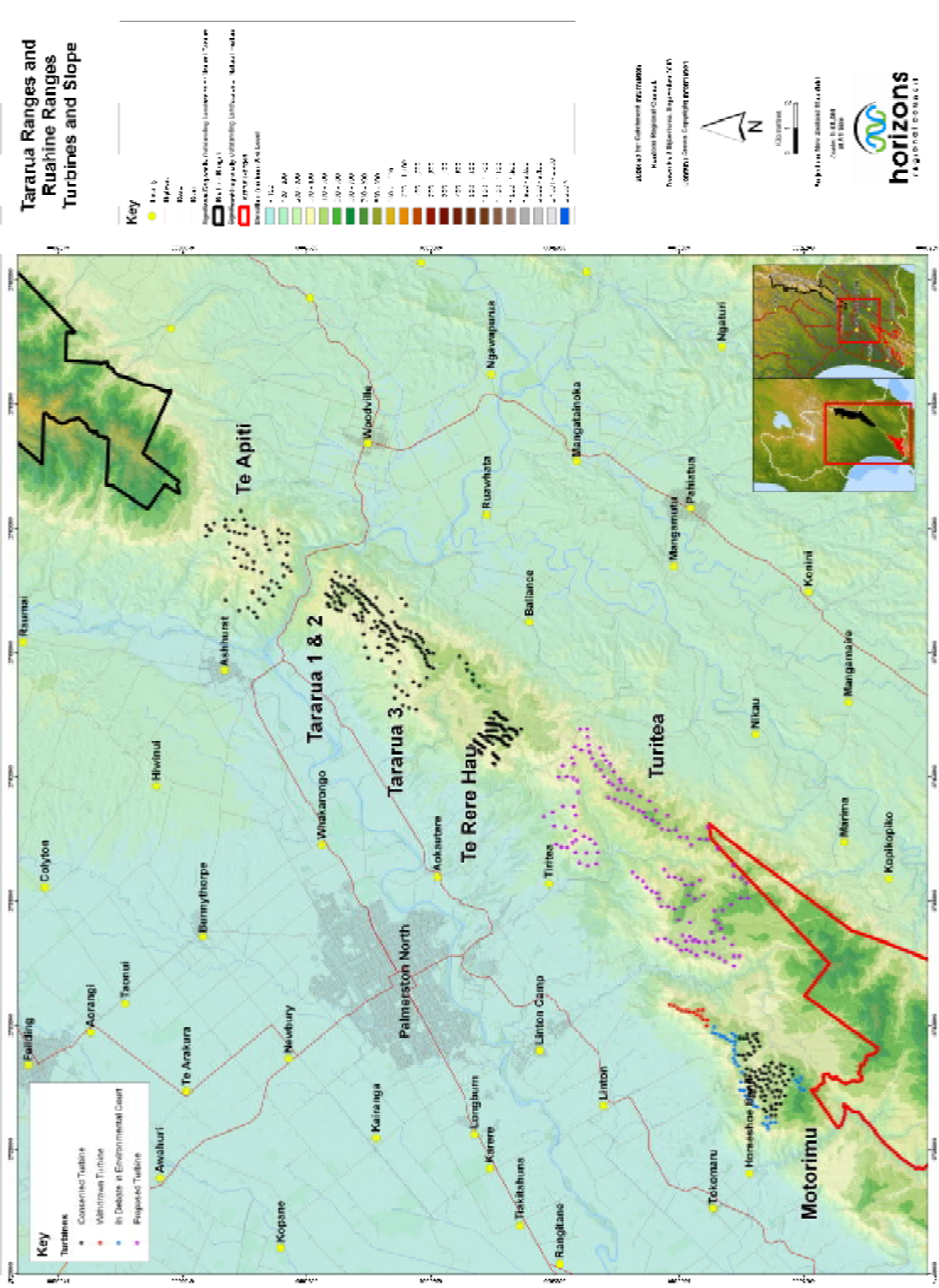
Attachment 2: Map of the Tararua Ranges showing existing, consented and proposed wind farms.

Attachment 3a and 3b: Maps of the Tararua and Ruahine Forest Parks (Schedule F areas) to show elevation classes.

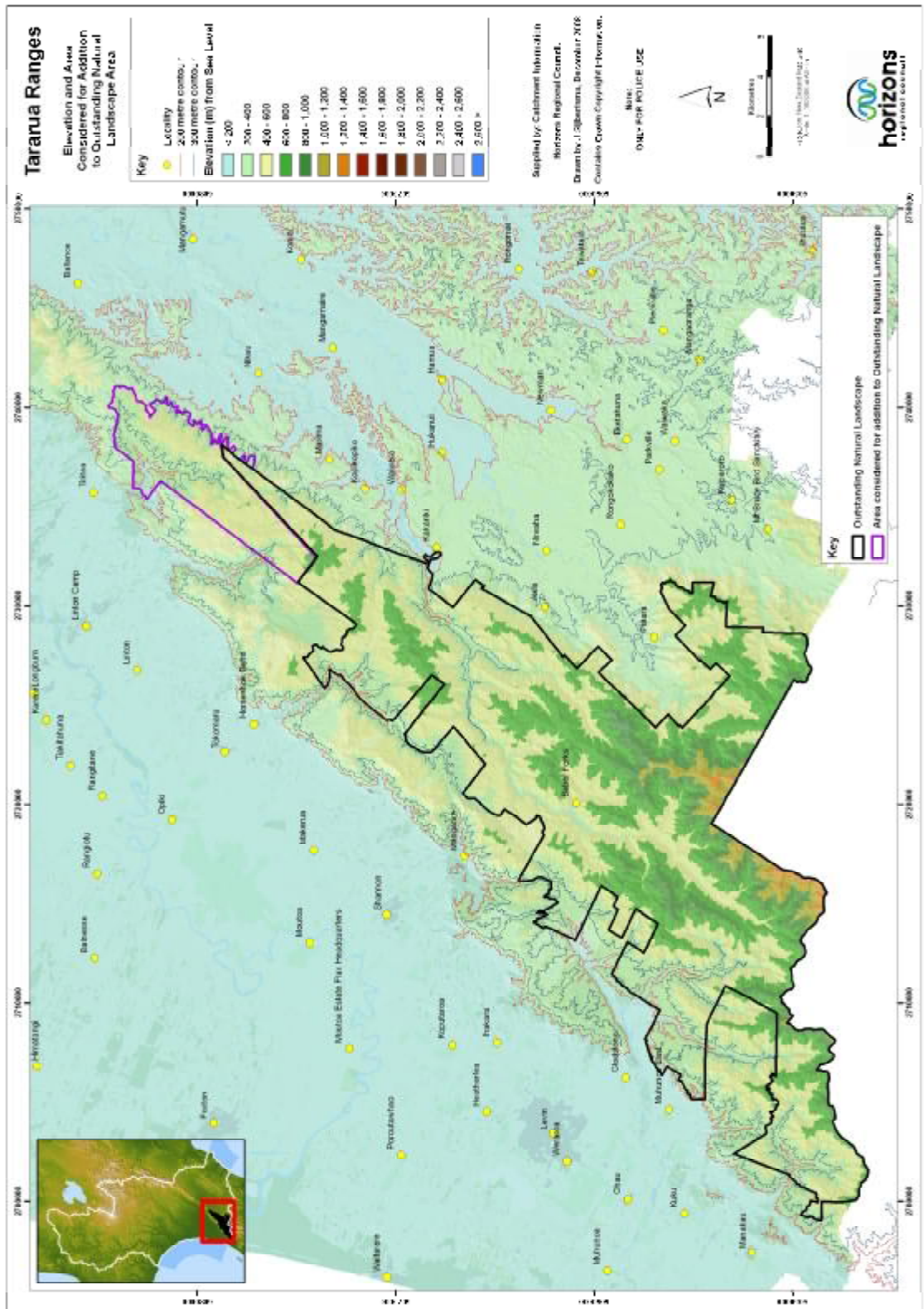
Attachment 4a, 4b and 4c: Maps with annotated notes explaining the boundaries and recommended amendments to boundaries for Schedule F Figure F:6, Figure F:10 and Figure F:2.



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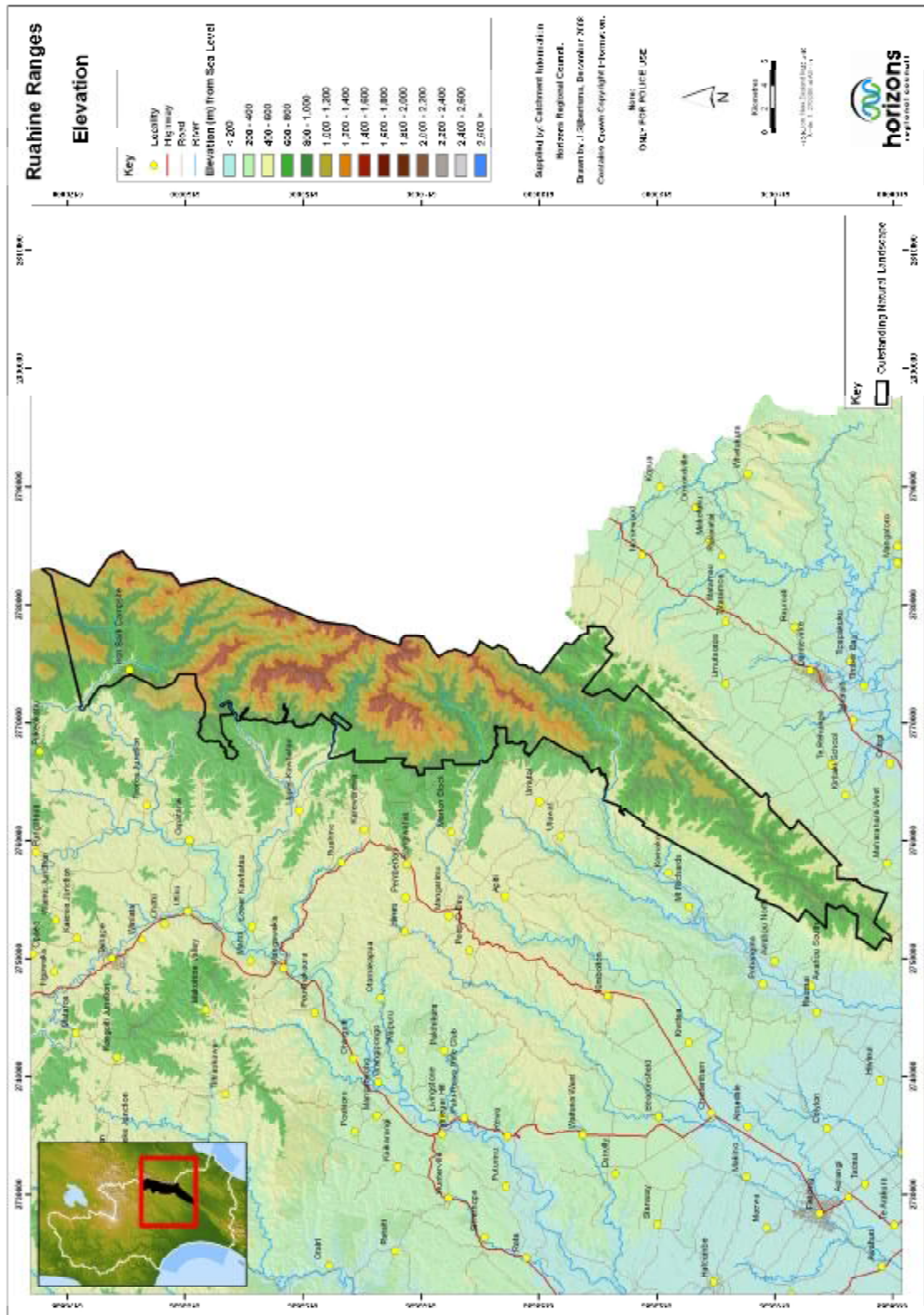


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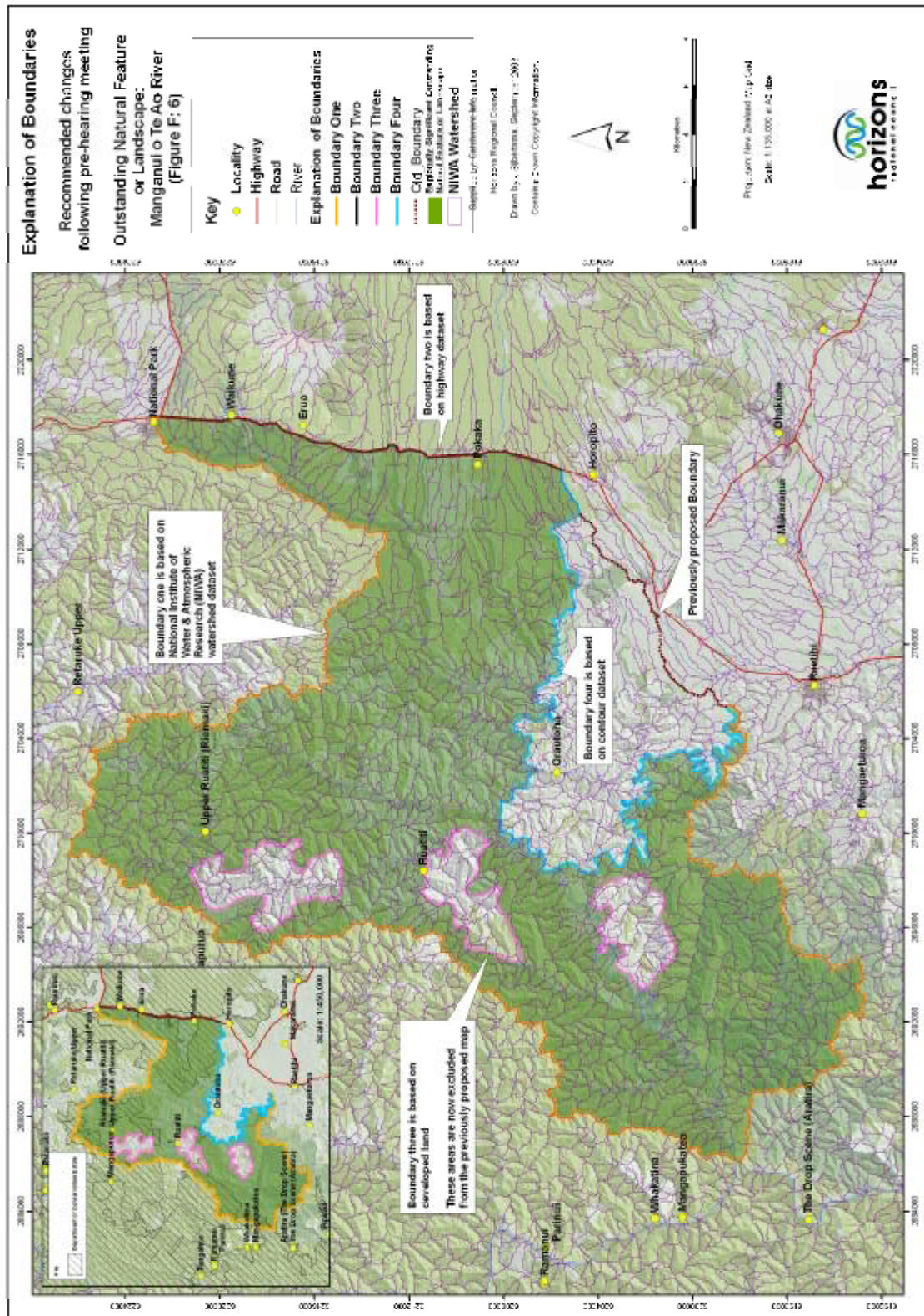


(3a)

Attachment 3a and 3b: Maps of the Tararua and Ruahine Forest Parks (Schedule F areas) to show elevation classes.



(3b)



(4a)

Attachment 4a, 4b and 4c: Maps with annotated notes explaining the boundaries and recommended amendments to boundaries for Schedule F Figure F:6, Figure F:10 and Figure F:2.

Explanation of Boundaries

Recommended changes following pre-hearing meeting

Outstanding Natural Feature or Landscape:
Manawatu Gorge
 (Figure F: 10)

Key

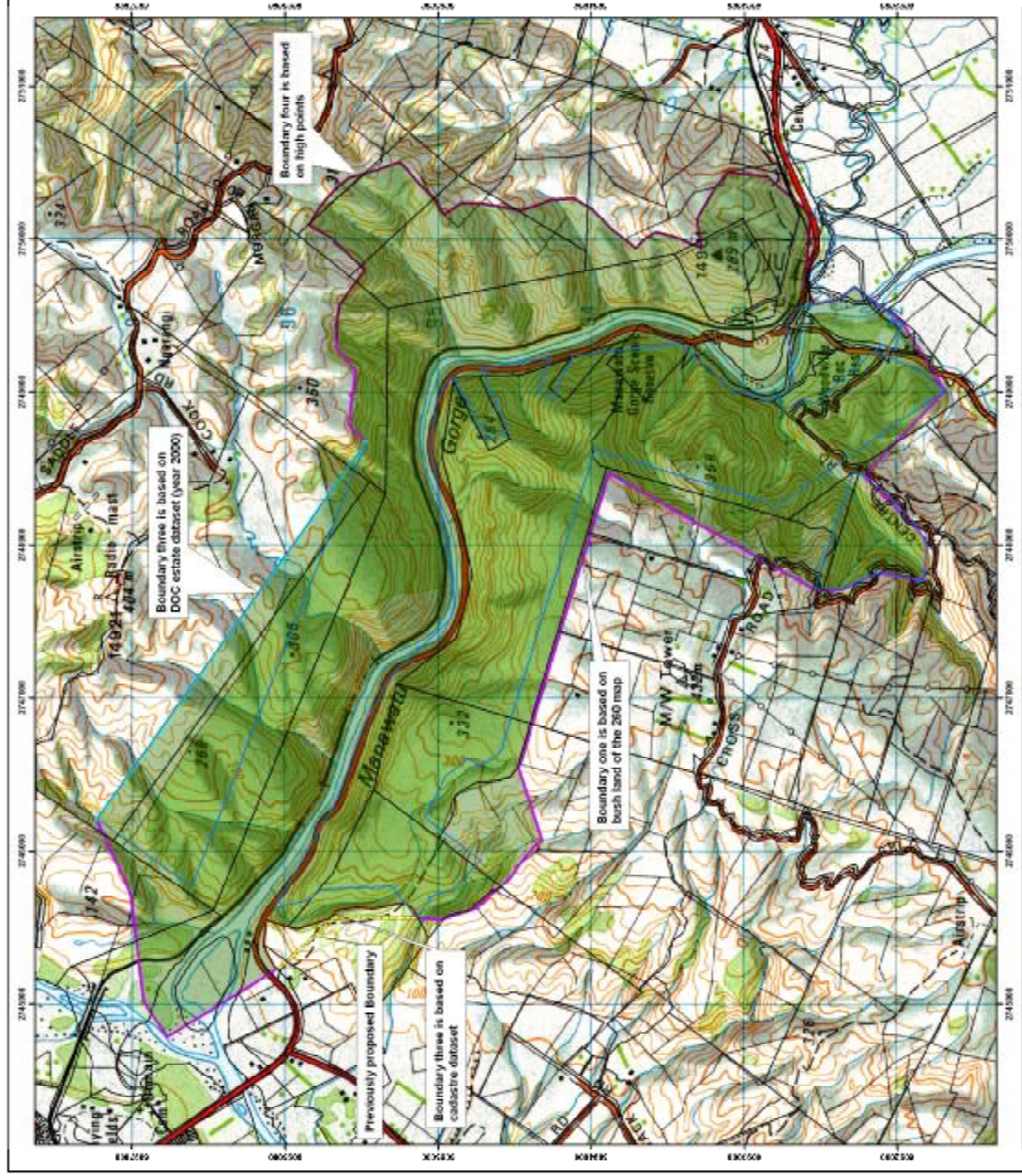
Explanation of Boundaries

- Boundary One
- Boundary Two
- Boundary Three
- Boundary Four
- Utility Four
- Utility Three
- Utility Two
- Utility One
- Water
- Proposed Boundary
- Previously proposed Boundary
- Boundary three is based on cadastral dataset
- Boundary three is based on DOC estate dataset (year 2000)
- Boundary four is based on high points
- Boundary one is based on bush land of the 200 map
- Boundary two is based on M/W Tawhai

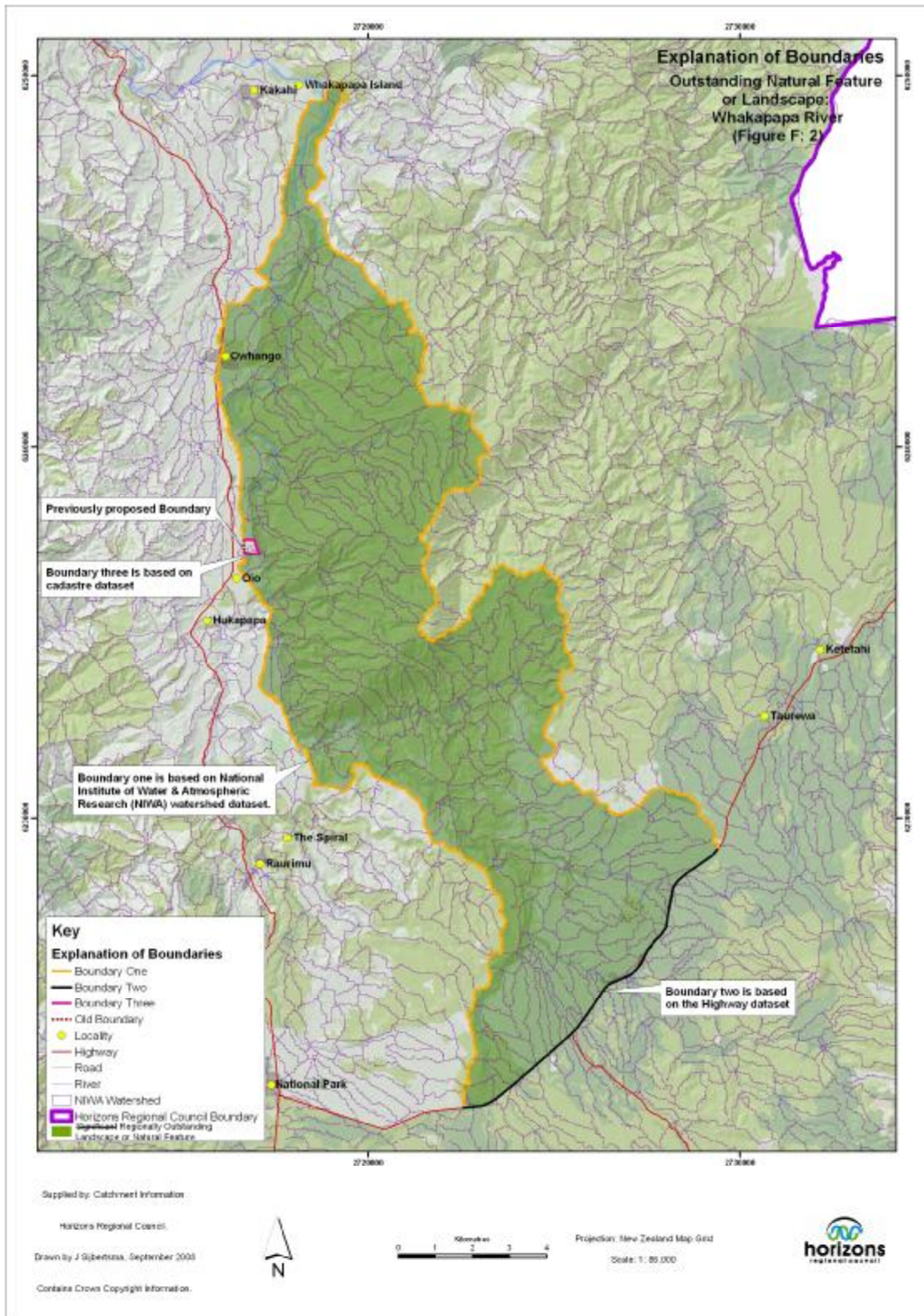
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(4b)



(4c)