

IN THE MATTER OF

The Resource Management Act 1991

AND

IN THE MATTER OF

Hearings on submissions  
concerning the Landscape Chapter 7 of the  
proposed Horizons Regional Council One Plan  
for the Manawatu-Wanganui Regional Council

**STATEMENT OF EVIDENCE OF KATY LILIAN AMUNDSEN NEWTON**

## **Introduction**

1. My name is Katy Lilian Amundsen Newton and I have a Bachelor of Science with Honours from Lincoln University. I have been working for the Department of Conservation (“the Department”) as a Community Relations Officer since early 2006 and my primary role has been to project manage the review of the Wanganui Conservancy Conservation Management Strategy. Additional to this, I have been involved in the review the Whanganui National Park Management Plan, the development of Parininihi and Tapuae Marine Reserves and various Resource Management Act projects. Prior to working at DOC, I was employed for 3 years by the Ministry of Agriculture and Forestry.
  
2. In the context of this hearing for the Landscape Chapter of the ONE Plan I am here as a representative or advocate for the Department of Conservation, and not as an expert witness. My role in relation to the Landscape Chapter has been as a researcher for the Department. I have gathered a significant amount of information from about the range of values associated with the landscapes and natural features addressed in the Department’s submission. The Department has not engaged an expert landscape architect for this hearing, but wishes to put forward this research information to assist the Committee. Technical Departmental staff familiar with the landscapes across the Region have also had input into the submission.
  
3. My evidence will:
  - (a) firstly set out the Department’s concerns with the way that its submission was analysed by Council officers for the purposes of the further submission process;
  
  - (b) secondly discuss the Department’s general submission points and the appropriateness of the methodology used to produce Schedule F – in this discussion I will also address the Department’s particular submission on terminology, and whether a mapping approach is required; and
  
  - (c) thirdly, individually deal with additional landscapes and features that the Department seeks to have included in Schedule F, and changes that are required to the existing feature descriptions.

## **(A) Submission Analysis Process**

4. When the original submissions to the Landscape Chapter were summarised by Council Officers, large portions of the Departments submission were combined into very general points. Much of the detail surrounding the Department's actual relief sought for specific sites was lost through the analysis (see page 291 – summary of submissions on landscapes and natural character).
5. The submission summary is largely relied on by submitters to develop their further submissions. This document should have highlighted the Departments proposals to include additional sites to Schedule F, so as to alert other interested parties and give them the opportunity to raise concerns. Unfortunately, the Department's detailed submission points were largely overlooked in the summary of submissions, despite the fact that the Department's submission was clear in its requests for additional sites to be added to Schedule F.
6. Council Officers have suggested that the inclusion of new sites into Schedule F would not be possible at this stage of the process, even though Council's landscape architect has in many cases agreed with the merit of including these sites as outstanding landscapes / features (refer pre-hearing reports 31 and 34). I note that Ms Gordon's Officers Report states (page 123-124) "*.....that no significant adjustments be made to the items in Schedule F, until such a time as landscape assessments are carried out by the Territorial Authorities*". The Department does not believe that it is sufficient for Council to use 'poor process' as a mechanism to advise against the addition of sites to the Schedule, if those sites are of outstanding value.
7. In order to meet the concerns of Council officers, as I will explain, for some particular sites the Department is recommending that inclusion into Schedule F be deferred until a full landscape assessment is undertaken and some re-notification process could occur. However for other sites the Department does not believe this is necessary. Ultimately, potential further submitters did have the ability to view the original submissions as well as the summary of submissions.

## **(B) General Discussion**

8. The Department supports a robust process being undertaken to identify the outstanding landscapes and natural features across the Manawatu-Wanganui Region using methodology endorsed by the

Environment Court<sup>1</sup>. The Department considers that is essential for this Region to have this process underway. This process should be considered a priority piece of work. Landscape assessment is increasingly becoming an issue of importance during resource consent assessments, and is a theme requiring clear direction and leadership. The Department agrees with other submitters that the methodology used to produce Schedule F has been deficient.

9. The Department would be supportive of a full landscape assessment being carried out by Manawatu-Wanganui Regional Council, but understands that a decision was made instead to ‘encourage’ territorial authorities to carry out this work within their districts. The Department does not have a view on whether regional or territorial authorities should take the lead in this landscape assessment exercise, however, as stated in Mr Maassen’s Report (point 16), territorial authorities are not directed by the ONE Plan to carry out the assessment (*“The policy suite does not direct TA’s to identify outstanding landscapes at a district level.”*).
10. Without such direction, there is a danger that territorial authorities will rely largely on the ONE Plan when identifying outstanding natural landscapes and features within their districts. The key concern of the Department is that not all of the Region’s outstanding landscapes/features have been identified in the ONE Plan. Ms Gordon states in her Officers Report (page 15) that *“The intended purpose of the list in Schedule F is to provide a comprehensive and definitive list of the natural features and landscapes that are considered to be outstanding at a regional level (ie regionally outstanding).”* This has not been achieved. It is evident that gaps occur in Schedule F as a result of the failure to conduct a complete landscape assessment in a comprehensive process. These gaps are illustrated by my research (as I set out further in this evidence). The rather ad-hoc approach to the inclusion of features has the perverse result of undermining the significance of those sites not captured, when compared with those sites that *are* captured as significant or outstanding.
11. The Department in its submission listed a series of sites that were considered to be omissions from Schedule F. For most of these sites the justification is simply ‘a common sense approach’ to site inclusion. It is recognised that the Schedule had been adopted from the operative Manawatu Wanganui Regional Policy Statement (MW RPS) and modified. The majority of the sites the Department seeks to be included are presently in the operative MW RPS.
12. The MW RPS landscape sites have been included within most of the current district planning documents in the Region as outstanding landscapes and natural features. Until district plans are

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<sup>1</sup>The Department does not challenge the ‘outstanding landscape assessment criteria’ identified in the ONE Plan.

reviewed, there will be a disparity between these district planning documents and the ONE Plan. In terms of the next ‘round’ of district planning, under the Act district councils are required to take the lead from regional planning instruments. If outstanding landscapes and natural features are omitted from Schedule F of the ONE Plan there is real probability that they will disappear from the second generation district planning documents. In this respect, Mr Maassen’s Report states (point 14), *“it is reasonable to expect the policy suite in POP to have the following consequences: (a) ensuring that second generation plans recognize those natural features and landscapes in Schedule F, Table F1 as outstanding and manage land use accordingly”*.

13. Council Officers have advised that sites that were removed from the operative MW RPS Schedules were considered to be adequately covered by other provisions in the POP – such as the Water or Biodiversity Chapters. However not all values attributed to outstanding landscapes or features would be covered by these provisions. Due to a full landscape assessment not occurring, it is likely that sites will have additional landscape values that are *not* recognised by other chapters. It is inadequate to rely on other Chapters of the ONE Plan for the protection of outstanding natural features and landscapes from inappropriate development. The primary reference should be the Landscape Chapter.

### **Terminology**

14. The Department raised a submission point regarding the use of wording consistent with the RMA throughout the ONE Plan. In particular, terminology such as *‘significant landscape’* and other variations which are scattered throughout, whereas the Act uses the words *‘outstanding natural features and landscapes’*. The Department would like to see the use of the terminology *‘outstanding natural features and landscapes’* throughout. Where *‘significant landscape’* is used, this should be replaced with *‘outstanding landscape’*. (Refer pre-hearing report 31 for discussions on this matter and page 11 of Ms Gordon’s Officers Report).

### **Mapping**

15. The Department has been involved in pre-hearing discussions around the use of mapping. Ms Gordon states in her Officers Report (page 15 and 16) *“In terms of the use of maps within the POP, it is important to note that there are no controls (rules) placed on activities depending on whether they may be within or outside of the mapped areas. They are instead a policy tool.”* The Department does not consider the mapping of the outstanding landscapes/features as an absolutely essential component of Schedule F, and would be satisfied that the text adequately identify those outstanding sites.

## **(C) Discussion by Place**

16. I will now turn to the part of the Department's submission outlining landscapes/features that warrant inclusion within Schedule F. Ms Gordon's Officers Report (pages 104-105) accurately reflects these points, as well as reflecting the relief the Department sought in terms of values absent from the landscape/feature descriptions listed in Schedule F.

### **Whanganui River**

17. The Department's submission identified that the Whanganui River should be included in Schedule F as an outstanding natural feature. The Whanganui River was previously considered 'outstanding' in the MW RPS but was not carried over to Schedule F of the ONE Plan. Ms Gordon states in her Officers Report (page 14) that "...the *Whanganui National Park and Whanganui River* were combined for the POP list." It is important to clarify that the Whanganui River is not part of the Whanganui National Park.

18. Neither the name of the River *nor* any associated values are included in (c) the Whanganui National Park section of Table F1, Schedule F. In pre-hearing discussions, Council Officers and their consultant landscape architect generally agreed that the exclusion of the Whanganui River from Schedule F was an oversight (refer pre-hearing report 34).

19. The Department is seeking the inclusion of the Whanganui River into Schedule F. We would prefer the entire River – down to the estuary, be included. In the MW RPS the Whanganui River is included with a description as '*Whanganui River and river valley upstream of Aramoana*'. A possible explanation that was given for why the MW RPS differentiated parts of the river (and listed the outstanding river feature to 'cease' at Aramoana and not reach further downstream) was that there is more significant modification of the landscape downstream of Aramoana. Whilst this may be the case, it could certainly be argued that the landscape values attributed to the River, such as cultural and recreational as well as ecological values do not cease arbitrarily at Aramoana.

20. Landscape values that were attributed to the Whanganui River and valley in the MW RPS are not likely to have been dramatically reduced since the MW RPS was created.

21. Values considered of importance to the Whanganui River and valley that would make it an 'outstanding natural feature' and worthy of inclusion in Schedule F include, but may not be limited to:

- a) Landforms and scenic qualities that are distinct with sharp-crested ridges, deep gorges, and sheer papa bluffs.
- b) The interwoven relationship of the River with the ecological values associated with the catchment, including the Whanganui National Park.
- c) Habitat for indigenous fish, whio/blue duck.
- d) Outstanding amenity and intrinsic values with appreciation for its wild, scenic natural values.
- e) That the River is NZs longest navigable river, canoeable for over 200km.
- f) That the River is the most canoed river in NZ.
- g) The spiritual, cultural and historical relationship of the Whanganui River to Maori.
- h) The connection to, and history of, the River for early Europeans.
- i) Atene Oxbow – a feature distinct within the River valley rated as ‘nationally important’ in the ‘Geopreservation Inventory’.

(Refer Appendix 1)

22. The landscape values listed above continue the entire length of the River.

23. The wording of the landscape description in the ONE Plan could read ‘*Whanganui River and river valley*’. Should the additional wording be adopted from the MW RPS then the value of ‘*historical importance*’ should be added. This is not present in the values attributed to the Whanganui River in the operative MW RPS.

24. Suggested wording – predominantly MW RPS wording.

Outstanding Natural Feature or Landscape	Characteristics / Values	Other Values
Whanganui River and river valley <del>upstream of Aramoana</del>	(i) scenic qualities provided by the gorge landscapes and papa rock formations; (ii) recreational value provided by the water and riparian margins.	(i) ecological value provided by the presence of original forest remnants; (ii) importance to tangata whenua; (iii) <i>historical importance</i> .

### **Ruahine Forest Park and Tararua Forest Park**

25. The Department’s submission identified that some of the values associated with Ruahine and Tararua Forest Parks were not adequately identified. We are supportive of the return to the format in the MW RPS which identifies and distinguishes between the skyline of the Ruahine and Tararua Ranges and the two Forest Parks. That is, the Department supports the wording recommended by

Ms Gordon in her Officers Report (page 120-121) regarding the skyline description for both Forest Parks.

26. For the ‘other values’ column of Ruahine Forest Park, we believe the recreational values should be expanded to read: *(iii) recreational values especially tramping and hunting*. We also suggest that the historical importance of the Park has been omitted and should be mentioned as *(v) historical values associated with early recreation, hunting and botanical exploration*. For the ‘other values’ column of the Tararua Forest Park we believe the recreational values should be expanded to read *(iii) recreational value especially tramping*; and the historical importance of the Park should be recognised as *(v) historical values associated with early recreation*.
27. The inclusion of these values is predominantly based on consistency with a range of conservation planning documents that also describe these value sets for the Ruahine and Tararua Parks such as the Tararua Forest Park Management Plan, Ruahine Forest Park Management Plan and relevant territorial authority planning documents. (Refer Appendix 2 of my evidence).

### **Moawhango Ecological Region**

28. The Department’s submission identified that the Moawhango Ecological Region (MER) should be included in Schedule F as an outstanding landscape. The MER is widely recognised for its ecological significance – and the report ‘Moawhango Ecological Region: survey report for the Protected Natural Areas Programme’ clearly describes these values. The boundaries of the area that the Department refers to are those consistent with this Report, and can be seen attached in Appendix 3. Pre-hearing report 31 states that, *“In Clive Anstey’s opinion the majority of this area is outstanding”*.
29. In the MW RPS, Ruapehu District Plan, Rangitikei District Plan and the Wanganui Conservation Management Strategy there are various combinations of outstanding landscapes/features (that fall within the MER) that are recognised. The values acknowledged in these planning documents are wide ranging from scenic, to ecological, recreational, cultural, spiritual and scientific. I have attached the relevant excerpts in Appendix 3. These values could be summarised as, but not limited to:
- a) A highly distinctive montane- subalpine region;
  - b) Characterised by undulating and plateau topography and extensive red tussock grasslands and mixed shrublands;
  - c) In geomorphological terms the NW Ruahine (Mangaohane Plateau etc) would be described as karst; with sinkholes, collapsed caverns, cliffs, and subterranean streams;



- d) These sites support biogeographically special flora;
- e) It is the only subalpine karst topography in the region and one of only a few such landscapes in the North Island.
- f) It is a landscape of plateaux and rolling hill country separated by wide, deeply incised valleys with striking rock formations.
- g) It appears largely unmodified and creates a sense of isolation.

30. A large portion of the MER is under management by the New Zealand Defence Force as the Waiouru Military Training Area. Their ‘sustainable land management strategy’ has a section dedicated to landscape – Chapter 2.7 – which states ‘*The distinctive landforms coupled with the natural or semi-natural vegetation and relative absence of built structures, combine to create high wild and scenic landscape values over much of the Waiouru Military Training Area*’. Additional material from this strategy is attached in Appendix 3.

31. Lands administered by the Department of Conservation adjoin the MER including the Tongariro National Park, the Ruahine Forest Park as well as other reserve lands. The legislation prescribing the protection of these lands - National Parks Act 1980 and Conservation Act 1987 - describe conservation values to include their natural state; their intrinsic worth; scenery of distinctive quality; features beautiful or unique or scientifically important. It is therefore likely that those lands adjoining these areas contain similar sets of characteristics and values – and that these would transcribe to fit with the ONE Plan outstanding landscape/feature criteria.

32. Statements in the Project Central Wind Assessment of Landscape and Visual Amenity Effects prepared by Stephen Brown Environments Ltd in 2008 for Meridian Energy support the assertion that the MER is of outstanding value.

- “*Thus, while the proposal (Project Central Wind) lies at the periphery of the highly valued landscaped of the Volcanic Plateau....*” page 5
- “*The Volcanic Plateau, together with its iconic cones and the Rangipo Desert, exert a powerful influence over public perception of the Central North Island.....*” page 6
- “*The network of state highways traversing the Volcanic Plateau, together with the North Island Main Trunk Line, Ohakune and Waiouru townships, Turoa Ski Field and access road, even the Army Museum, create pockets and corridors of elevated sensitivity related to direct experience of these landscapes by the general public.*” page 26

33. Whilst it is highly likely that the entire MER would (against a thorough landscape assessment) rank as outstanding landscape, the Department acknowledges the difficulties that this poses to Council due to the number of adjoining and affected persons. Our suggestion at this point is for there to be

a note made in the ONE Plan for the MER to be considered further for inclusion in the Schedule during any landscape assessment that is made in the future.

34. In the meantime, within the MER there are a number of landscape units which qualify as ‘outstanding’ in their own right. These all have distinctive and significant landscape, ecological, cultural and recreational values that meet the criteria to be of outstanding value. The Department requests that the following three sites be added to Schedule F:
- a) Kutaroa and Otahupitara Swamps (Irirangi Swamp) near Waiouru (listed in the operative MW RPS but omitted from the ONE Plan);
  - b) Mt Aorangi – amend the boundary to include Makirikiri Tarns and Reporoa Bog (sites listed in the operative MW RPS but omitted from the ONE Plan);
  - c) Eastern Desert Road Landscape – important landscape viewed from State Highway One including two recommended areas for protection, Mt Azim gorge and parts of the Moawhango River .

#### **Kutaroa and Otahupitara Swamps (Irirangi Swamp)**

35. This large (504ha) and distinct wetland complex and was identified in the operative MW RPS, and Ruapehu and Rangitikei District Plans, as an outstanding natural feature/landscape. It was also recognised as an important wetland when the Moawhango Ecological Region survey was undertaken in 1993.

36. It is unclear why these swamps were omitted from the ONE Plan however one may assume that it is thought the values associated with these swamps will be covered in other sections of the ONE Plan, predominantly Schedule E. Appendix 3 provides additional information on the values of these swamps and these values can be summarised as, but not limited to:

- (a) The wetlands are diverse and important for landscape integrity;
- (b) It is significant to the functional coherence of the remaining natural landscape and mergers within the wider landscape of natural and modified areas;
- (c) It is visible from State Highway One and the openness of the landscape fits well into the rolling hills of pasture and steeper slopes leading to the Raketapauma Conservation Area.

37. It is also relevant to note that landscape values that were attributed to the Kutaroa and Otahupitara Swamps (Irirangi Swamp) in the MW RPS are not likely to have been dramatically reduced since the MW RPS was created. In fact they may have been enhanced with the recent purchase of two

private blocks by the Nature Heritage Fund. (We do not see it essential nor necessary to map this swamp complex in the ONE Plan, mention in Schedule F Table F1 is adequate).

**38. Suggested wording – predominantly reinstating MW RPS wording with a minor change**

Kutaroa and Otahupitara Swamps (Irirangi Swamp)	(i) scenic <i>and visual</i> qualities provided by the drowned landscape features of the extensive wetland system that surrounds former hilltops;	(i) ecological values provided by the extensive wetland systems of peat bog, remnant shrublands and wet tussockland fringes; and their ecological importance as habitat for threatened indigenous plant species and the fernbird.
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**Mt Aorangi**

**39.** The Department supports the inclusion of Mt Aorangi in the Schedule however we are unsure how the Mt Aorangi boundary was determined (Map F:5 2km diameter, 1000 contour). Ms Gordon discusses this in her Officers Report page 123-124. We suggest that the boundary be amended so it is consistent with the boundary of the Nga Whenua Rahui kawenata or covenant for Moari land (Aorangi-Awarua). If the Mt Aorangi boundary were amended, it would incorporate two sites that are listed as outstanding in the operative MW RPS (Reporoa Bog and Makirikiri Tarns) but omitted from the ONE Plan.

**40.** Values associated with the Aorangi Awarua block are clearly identified in the MER survey report 1993 and other documentation (Appendix 3). These values can be summarised as, but are not limited to:

- a) Dramatic landscape contrasting of the Mangaohane Plateau against Mount Aorangi and the Ruahine Ranges;
- b) Landscape amenity values including plateau vistas of extensive red tussock grasslands and inaka shrublands abutting kaikawaka forest are prevalent in this place;
- c) The unbroken altitudinal sequence of forests between the Rangitkei River and Ohutu Ridge;
- d) Significant role in the maintenance of water quality and in the recharge and discharge of ground water, sediment trapping and flood control.
- e) Mt Aorangi has historical significance for Ngati Whiti and Ngati Tama people relating to legends and the past collection of mottled petrels from the summit.

f) The area is ecologically very important for having a number of open country native plants that are unknown elsewhere in the North Island along with *Powelliphanta marchanti*, a nationally rare large land snail.

41. It is also relevant to note that landscape values that were attributed to these sites in the MW RPS are not likely to have been dramatically reduced since the MW RPS was created. In fact, they may have been enhanced through the kawenata.

42. The Department has had useful discussions with members of the Aorangi-Awarua Trust regarding amending the boundary as suggested however we acknowledge that further consultation with the Aorangi – Awarua Trust may be necessary.

43. Suggested wording amendments – incorporating wording from ONE Plan and MW RPS with minor amendments:

(e) <del>Mount</del> Aorangi – Awarua	(i) Visual and scenic characteristics, particularly <i>Mount Aorangi's</i> <del>its</del> visual prominence <i>and contrast to the Mangaohane Plateau.</i>	(i) Intrinsic value. (ii) Ecological significance, provided by areas of unmodified podocarp forest, <i>high diversity of wetland types</i> and as a habitat for rare indigenous <i>flora and fauna.</i> (iii) <i>Scientific value, particularly Reporoa Bog and Makirikiri Tarns;</i> (iv) <i>Importance to tangata whenua.</i>
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**Eastern Desert Road Landscape**

44. Tussocklands are part of the cultural identity of many New Zealanders, to whom they are parts of primeval New Zealand. Although largely created by repeated fires, they now form the most distinctive landscape in this outstanding landscape. Contained within this area are some of the North Island’s most extensive remaining red tussock grasslands, along with mixed shrublands, forests, wetlands and subalpine herbfields. These often fragile and increasingly rare ecosystems support a high number of specialised plant species and several rare and endangered plant and animal species.

45. All of the land recommended for inclusion as an outstanding landscape in Schedule F is in NZ Defence Force (NZDF) ownership. Appendix 3 contains a map and excerpts of relevant documentation. This area includes two areas identified in the Moawhango Ecological Report 1993 as recommended areas for protection (RAP). These areas are Pleasants Bush (RAP 7) and Ngawakaakauae (RAP 2). We acknowledge that the NZDF has a high measure of protection on both these RAP's and commend them for undertaking this protection.

46. Values associated with this landscape are as vast as the landscape itself. Such values include, but are not limited to:

- a) Mount Azim Gorge - the most spectacular superimposed river gorge in the Moawhango Ecological Region.
- b) The scattered native forest remnants are of great visual importance as they give a scale to the landforms, and they punctuate not only the tussock grasslands but also the areas converted to pasture.
- c) The low incidence of artificial structures in the areas adds to the sweeping, uncluttered nature of the landscapes. The existing buildings, fences, and roads are mostly unobtrusive.
- d) The range of ecosystems is vast and many are fragile and becoming increasingly uncommon.
- e) Tussock lands, associated remnant forests, peat bogs, swamps, flushed areas and small lakes all provide habitat for a large diversity of species.
- f) The Moawhango River above Lake Moawhango is unmodified and has high natural values.
- g) The Moawhango River Valley, immediately downstream of Lake Moawhango, has high scenic values owing to its very deep and narrow gorge.
- h) There are extremely high amenity values due to the area being under NZDF ownership. The main way people interact with this landscape is as they view it from their car window travelling along State Highway One north of Waiouru. A film was made along this stretch of road in 2006 which investigates this concept; *The Lucky One/View from the Road* by Antje Kulpe and Ruth Korver – *“What struck us the most was that while we were trying to engage with the landscape we found that the view was mediated by the camera and by the car. Our experience of the Desert Road was through layers of glass. This was a surreal concept”*.

(Refer Appendix 3)

47. Suggested wording:

Eastern Desert Road Landscape	(i) Visual and scenic characteristics particularly the tussocklands viewed from State Highway One and the gorge landscape of Mt Azim.	(i) Intrinsic value. (ii) Ecological significance particularly Pleasants Bush and Ngawakaakauae. (iii) Scientific value
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## **New Zealand Geopreservation Inventory**

48. The 'New Zealand Geopreservation Inventory' (the inventory) is an inventory of important geological sites and landforms. It currently contains over 2600 sites New Zealand-wide. It is computerised with a wide variety of data about each site, including an assessment of its scientific, educational or scenic importance (c.200 have an international ranking, c.900 national and the remainder are ranked as regional).
49. The Inventory was initially compiled nation-wide under different subject categories (e.g. fossil sites, igneous sites, caves and karst, etc). Few field surveys were undertaken specifically for the inventory compilation, instead the combined knowledge and advice of the majority of New Zealand's earth scientists was utilised, representing hundreds of person years of field work.
50. The Department has sought through submission that a review of sites in this Region that are listed in the inventory be undertaken by Council, and for those that are not represented in the landscape Schedule to be included. I understand that this review has been carried out by Clive Anstey and will be presented in his evidence.
51. The Department has also sought the inclusion of this inventory as a document worthy of reference by practitioners using the ONE Plan for landscape assessment. The inventory is a living document and will continue to be updated. The suggestion is to include a reference to the NZ Geopreservation Inventory in the Landscape Chapter, section 7.1.3 text.

## **Lake Horowhenua**

52. The Department's submission identified that Lake Horowhenua should be included in Schedule F as an outstanding natural feature. It is one of the sites that was previously considered as 'outstanding' in the MW RPS but was not carried over to Schedule F. During pre-hearing discussions Council and their consultant landscape architect generally agreed that the Lake should be reinstated in Schedule F (refer pre-hearing report 34).
53. The lake lies on a sand plain near Levin and covers an area of approximately 390 hectares. It is an example of freshwater lake that is part of the natural ecology of the dune belt bordering the lower south west North Island. It is fed by various small streams, springs and associated swamps and is drained by Hokio Stream. The lake is valued for its recreational use for windsurfing, sailing, rowing and sometimes swimming. The cultural values associated with the Lake are very high – and it is

recognised as a taonga to tangata whenua. The ecological importance is also high and will be provided protection in the biodiversity section – Schedule E - of the ONE Plan. The lake is also referenced in the Horowhenua District Plan as the largest of 5 dune contact lakes in the District. Excerpts from supporting documents are attached in Appendix 4.

54. It is also relevant to note that landscape values that were attributed to Lake Horowhenua in the MW RPS are not likely to have been dramatically reduced since the MW RPS was created.
55. The Department would accept the re-instatement of wording from the MW RPS for Lake Horowhenua where it is recognised for its ecological importance, its importance to tangata whenua and its recreational value. We also recommend the inclusion of cultural food gathering as a recognised value.

### **Lake Papaitonga**

56. The Department's submission identified that Lake Papaitonga should be included in Schedule F as an outstanding natural feature. It is one of the sites that was previously considered as 'outstanding' in the MW RPS but was not carried over to Schedule F. During pre-hearing discussions Council and their consultant landscape architect generally agreed that the Lake should be reinstated in Schedule F (refer pre-hearing report 34).
57. The lake is located near Levin and is surrounded by wetland and coastal forest. The lake is highly valued by tangata whenua as it was originally settled in the early 1800s. The lake contains two small islands, Motukiwi and Moutungarara, the latter being an artificial island constructed by Mauapoko residents. Lake Papaitonga is contained in the Papaitonga Scenic Reserve, and was one of the very early scenic reserves. Last century it was owned by Sir Walter Buller who acquired it for preservation purposes. The ecological values of the reserve are significant. The reserve contains the only intact sequence from wetland to mature dry terrace forest in Wellington and the Horowhenua. The reserve contains one of the largest remnant populations of *Powelliphanta* snails in the Manawatu and also provides habitat for birdlife including the waterfowl, swamp and forest birds. Recreational values include tracks through the forest to the lake margin that are well utilised for day trips due to proximity to Levin and State Highway One. Lake Papaitonga is also rated as of regional importance on the NZ Geopreservation Inventory as an excellent example of a dune dammed lake, one of few examples remaining with surrounding natural forest. Excerpts from supporting documents are attached in Appendix 4.

58. It is also relevant to note that landscape values that were attributed to Lake Papaitonga in the MW RPS are not likely to have been dramatically reduced since the MW RPS was created.
59. The Department would accept the re-instatement of wording from the MW RPS for Lake Papaitonga where it is recognised for its ecological importance, its importance to tangata whenua, its recreational value and scenic qualities.
60. Should it be deemed necessary by Council to include a map of Lake Papaitonga, there are several fingers of land adjacent to the reserve that have had protection covenants placed over them. It would make sense to include these in the mapped area.

### **Pakipaki Dune Forest**

61. The Department submitted a request that Pakipaki Dune Forest be included in Schedule F. Pakipaki Dune Forest was identified in the Foxton Ecological District Survey 1992 as an area Recommended for Protection. Excerpts from this document are attached as Appendix 5. It has become apparent that the Forest will likely be protected under Schedule E – Biodiversity section of the ONE Plan (depending on the outcome of decisions and any future appeals). Whilst we acknowledge that there are likely to be landscape values associated with this site, access to documentation regarding the values additional to ecological is difficult to locate. Ecologically we are satisfied that the Schedule E should provide adequate protection. We would therefore withdraw our request for this site to be included in Schedule F, but would recommend that in future the Pakipaki Dune Forest be assessed against the ONE Plan’s landscape criteria for its potential as an outstanding landscape/natural feature.

### **Coastline**

62. The Department is supportive of the ‘Coastline’ feature that has been identified in Schedule F. However, there is a misrepresentation in the current text version. “*Akitio Shore platform*” is specifically identified in the ‘feature/landscape’ column of the Schedule, while other similarly valued sites have not been specified in the text, and therefore may not be afforded the same status as this site.
63. We are seeking the inclusion of the wording ‘...*Akitio Shore Platform, Castlecliff to Nukumaru coastal cliff; Landguard Bluff; Foxtangi dunes and Hokio Beach dune lands*’ – in addition to ‘Akitio Shore



Platform’ in the ‘Feature/landscape’ text description. We are also seeking a similar request for the ‘Other Values’ column – where some river estuaries of significance have been identified – and others with similar value sets remain non-specified. We are seeking the inclusion of the wording “...*Rangitikei, Akitio, Ohau, Waikawa and Manawatu river estuaries...*”.

64. During pre-hearing meetings Horizons staff generally agreed that these additional sites were sensible inclusions (refer pre-hearing report 34). The wording that was agreed is as follows:

Outstanding Natural Features or Landscape	Characteristics/ Values	Other values
(k) Coastline of the Region, particularly the Akitio Shore Platform, <i>Castlecliff to Nukumarū coastal cliff; Landguard Bluff; Foxtangī dunes and Hokio Beach dune lands</i>	(i) Visual and scenic characteristics, particularly its special coastal landscape features. (ii) Coastal geological processes.	(i) Ecological value, particularly the Whanganui, Whangaehu, Turakina, Rangitikei, <i>Akitio, Ohau, Waikawa and Manawatu</i> river estuaries as habitats for indigenous fauna. (ii)...etc...

65. The additional coastal sites (Castlecliff- Nukumarū; Landguard Bluff etc) are all rated as either regionally, nationally or in the case of Castlecliff – Nukumarū of international significance on the NZ Geopreservation Inventory. These sites have also been listed in the Horowhenua District Plan in their Outstanding Landscapes and Natural Features sections. Appendix 6 provides additional information from relevant documentation.

### **Rangataua Larva Flow**

66. The Rangataua Larva Flow arises in the Tongariro National Park, and is the longest larva flow in New Zealand. It is a very extensive sequence of (possibly) 6 lava flows extending 14km from source at a low mound of welded and nonwelded scoria. In the NZ Geopreservation Inventory it is rated as of national importance. It is considered to be a member of the Whakapapa Formation. Appendix 7 provides a map and excerpts of relevant documentation.

67. The Department has requested the inclusion of the flow in Schedule F and is satisfied that it can be added as a ‘characteristic/value’ of the ‘Tongariro National Park’. Acceptable wording would be an additional characteristic of “...*(ii) Geological features including the Rangataua Larva Flow*”.

## **Waimarino – Erua – National Park Fault and The Western Edge of the Volcanic Plateau**

68. The Waimarino - Erua - National Park fault was identified in the Department's submission for inclusion in Schedule F. It is a significant feature in the vicinity of Tongariro National Park. It is a long, highly distinct straight fault scarp that physically dissects the natural landscape. The Western edge of the volcanic plateau where it abuts the highly dissected western hill country is a very distinct boundary between two different landforms, often marked by high escarpments. Whilst we continue to believe that this area is likely to meet the criteria to be an 'outstanding landscape' there is little we can provide in the way of documented evidence to support this at present. We also acknowledge that this is a large area of land, and will include some tracts of private ownership. Our suggestion at this point is for there to be a note made in the ONE Plan for this area to be considered further for inclusion in the Schedule during any landscape assessment that is made in future. A map of this area has been included in Appendix 7 for your reference.

## **Central North Island Tussock Lands**

69. There are extensive tussock lands that fall outside of the Moawhango Ecological Region which – like the Moawhango Region - have characteristics/ values similar to the surrounding conservation land. The Department's submission sought the inclusion of these lands within Schedule F, and whilst we continue to believe that the tussock lands are likely to meet the criteria to be an 'outstanding landscape' there is little we can provide in the way of documented evidence to support this at present. We also acknowledge that this is a large area of land, and will include some tracts of private ownership. Our suggestion at this point is for there to be a note made in the ONE Plan for this area to be considered further for inclusion in the Schedule during any landscape assessment that is made in future. A map of this area has been included in Appendix 7 for your reference.

## **SUMMARY**

70. The Department recognises that the Landscape Chapter is an essential and advantageous tool to be included in the Proposed ONE Plan. We have taken the opportunity to highlight to you some of the discrepancies we have identified in the current version. This assessment is not intended as a full assessment of the outstanding landscapes/natural features in the Region; it is merely an additional tier of information to be included in the interim of a full assessment being undertaken.

71. There is a need for a thorough landscape assessment to be completed, with a robust and consistent methodology. We note that Clive Anstey, in his evidence (point 9) recommends that a comprehensive landscape assessment and evaluation be undertaken.
  
72. In the interim, if the additions suggested by the Department are not included in Schedule F at this stage of the process, there is a real possibility that those outstanding landscapes and natural features will be compromised. The current Schedule contains gaps which will not necessarily be filled by exercises undertaken by territorial authorities - territorial authorities are only encouraged to undertake their own landscape assessments and there is no timeframe within which this will occur. In addition, in terms of the hierarchy of planning instruments, territorial authorities are likely to 'take the lead' from the ONE Plan.
  
73. As the Landscape section of the ONE Plan will be used in a variety of ways (for example referenced in landscape assessments, submissions, funding applications and district planning documents) it is crucial that the landscape section is robust and provides adequate guidance to whoever is using it. The ONE Plan will have a life of at least 10 years. We need to take this opportunity to ensure that landscapes and natural character of the Region are adequately protected now.

## APPENDICES

- 1) Whanganui River
- 2) Ruahine and Tararua Forest Parks
- 3) Moawhango Ecological Region
- 4) Lake Horowhenua and Lake Papaitonga
- 5) Pakipaki Dune Forest
- 6) Coastline
- 7) Rangataua Larva Flow, Waimarino – Erua – National Park Fault, the western edge of the volcanic plateau and the central North Island Tussock Lands