

**BEFORE THE HEARINGS PANEL**

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

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**Supplementary Report and Recommendations of Clive Anstey**

**Regarding Submissions On  
Chapter 7 and Schedule F  
Outstanding Natural Features and Landscapes Provisions**

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## **REASON FOR THIS REPORT**

1. I have been asked to prepare this report by Horizons Regional Council to address three sets of issues relating to Chapter 7 and Schedule F of the Proposed One Plan (POP):
  - a. issues outstanding in the submission of the Minister of Conservation
  - b. landowners' boundary issues
  - c. issues raised in expert evidence by submitters.

### **(a) Minister of Conservation's submission**

2. At the time of Fiona Gordon's February report discussions were in progress with Department of Conservation (DOC) staff about some requests in the Minister of Conservation's submission (submission points numbered 372/237, 238, 239, 240, 241 and 242). Since then Fiona Gordon and I have met with DOC staff on two occasions. We have revisited the Minister's submission in detail and have considered the additional material and evidence supplied by the Department in support of the decisions requested in the Minister's submission. In summary, the requests are to include several additional natural features and landscapes in Schedule F and to include additional text describing items already listed in Schedule F. This report provides comment and recommendations on the merit or otherwise of the Minister of Conservation's submissions.

### **(b) Landowner issues**

3. Various landowners raised issues regarding the location of boundaries affecting their land use activities. They also questioned the merit of some inclusions. I comment on these matters, their resolution and ongoing discussion below.

### **(c) Issues raised in evidence**

4. Some evidence submitted helped to clarify points raised in submissions. Caucusing meetings with planners and a landscape architect representing the interests of various energy companies provided the opportunity to discuss and clarify a number of matters. These were primarily concerned with the merit of some listings in Schedule F, the boundaries of mapped areas, and the direction the Plan provides on landscape assessment. These meetings were useful and as a result I am of the view that some changes should be made to improve the clarity of the POP. The issues raised at caucusing meetings are outlined below with my comments.

## **REVIEW OF SCHEDULE F HAVING REGARD TO DOC SUBMISSIONS AND WITH REFERENCE TO THE NEW ZEALAND GEOPRESERVATION INVENTORY**

5. Most areas and features listed in the current Regional Policy Statement (RPS) were carried over into the POP. Most of the areas and features requested for inclusion in the POP by DOC were areas and features not carried over from the current RPS.
6. At the mediation meeting facilitated by Richard Thompson on 12 March 2009 it was agreed to include a number of areas and features requested by DOC.
7. Subsequent information provided by DOC, and comment by Fleur Maseyk of the Regional Council, added weight to the inclusion of a number of areas and features. DOC accepted at the March meeting that inclusion of the whole of the Moawhango Ecological District was problematic for the Regional Council and accepted that the

inclusion of specified and critical areas and features within the ecological district would be an acceptable compromise. There are however difficulties with the proposed additions due to their location on private properties, requiring consultation and the support of landowners.

8. A review of the NZ Geopreservation Inventory was carried out at DOC's request. It identified a number of additional features that might also be included in Schedule F, but not mapped. A number of features listed in the NZ Geopreservation Inventory are located within already mapped areas in Schedule F of the POP and it was agreed to list them where they have merit as landscape features.
9. To provide some background to DOC's requests it is useful to consider the areas and features listed in the current RPS that were not carried over into DOC.

#### **Natural features and landscapes not carried over to Schedule F**

- Kutaroa and Otahupitara Swamps near Waiouru
- Makirikiri Tarns, Mangaohane Plateau
- Reparoa Bog
- Hautapu River and adjacent river valley
- Pureora Forest
- Pohangina River and river valley
- Manawatu River Estuary
- Lake Papaitonga
- Pukepuke Lagoon
- Lake Horowhenua
- The skyline of the Puketoi Ranges
- Mangatainoka River
- Makuri River and Gorge

### **OUTSTANDING NATURAL FEATURES AND LANDSCAPES SUPPORTED FOR INCLUSION IN SCHEDULE F**

#### **Whanganui River**

10. It was agreed with DOC that to include the Whanganui River in a meaningful way would ideally require the inclusion of the river as 'whole system'; that is all of the tributaries as well as that section from below the National Park down to the river mouth. However, following considerable discussion since the pre-hearing meetings, it was agreed that the section of the river running within the boundaries of the National Park should be included in Schedule F. I consider that a more inclusive listing in the Schedule would require comprehensive assessment and consultation, with iwi in particular.

#### **Ruahine Forest Park – additional values**

11. DOC requested the inclusion of recreational, ecological and historical values for the Park in Schedule F. As these values are fundamental to the Park's values as an outstanding landscape, these should be included in Schedule F.

#### **Tararua Forest Park – additional values**

12. DOC requested the inclusion of recreational, ecological and historical values for the Park in Schedule F. As these values are fundamental to the Park's values as an outstanding landscape, these should be included in Schedule F.

## **Coastline**

13. DOC requested the inclusion of a number of landscapes and features associated with the coastal environment, some within the currently mapped area and some not. In my view, all of the features DOC lists have merit. As outstanding features they also contribute to the natural character and quality of their wider settings. From a landscape perspective the following features should therefore be explicitly included in Schedule F as they are located within already mapped areas in Schedule F POP:
- a. Fox-Tangi Dunelands
  - b. Hokio Beach South Dunelands
  - c. Himatangi Dune Fields
  - d. Castlecliff to Nukumarua Coastal Cliffs
  - e. Akitio Shore Platform
  - f. Akitio, Ohau, Waikawa and Manawatu estuaries
  - g. Rangataua Lava Flow – in my view this feature has merit as a defining feature in the landscape as well as having scientific and educational values. It is within the mapped area for the Tongariro National Park and Rangipo Desert in Schedule F of the POP. It should therefore be identified as a feature in Schedule F for Tongariro National Park and Rangipo Desert.

## **OUTSTANDING NATURAL FEATURES AND LANDSCAPES NOT SUPPORTED FOR INCLUSION IN SCHEDULE F**

### **Landguard Bluff**

14. In my view, Landguard Bluff does satisfy the criteria set out in the POP to qualify as an outstanding feature. However, it is not within the mapped coastline area in Schedule F and is located on private land. For this reason it cannot be listed as a feature in the mapped coastal area without full consultation with landowners.

### **Lake Horowhenua**

15. In my view, the Lake Horowhenua and its surroundings are of considerable merit as an outstanding landscape, at least at the district level. However, the lake is outside the mapped area of the coastline in Schedule F and to include it in the Schedule would require consultation with landowners and surrounding landowners. In the draft Landscape Assessment carried out by Horowhenua District Council it is recommended for recognition as outstanding.

### **Lake Papaitonga**

16. Lake Papaitonga Is a scenic reserve that in my view easily qualifies as an outstanding landscape of national significance due to its natural values and history. However, as the lake is beyond the boundaries of the currently mapped area of the coastline in Schedule F it cannot be included without wide consultation, in particular with adjacent landowners. The lake is recommended as outstanding in the Horowhenua District's draft Landscape Assessment.

### **Waimarino-Erua National Park Fault**

17. I agree with DOC that this is a significant feature in the volcanic landscape of the Central North Island. However, there is insufficient information for me to determine its precise values and location. A major section of the fault runs through the area mapped as Manganui o Te Ao River and River Valley, and would require further landowner consultation before any formal inclusion in Schedule F.

### **Western Edge of the Volcanic Plateau**

18. This feature has merit for inclusion for the same reasons as the Waimarino-Erua National Park Fault. However, insufficient information was available about its related values or location in relation to mapped areas.

### **Central North Island Plateau Tussocklands**

19. Much of the tussocklands of the Central North Island are covered by the biodiversity provisions of the POP. It was agreed that these tussock landscapes are of a high value but there was insufficient information to justify their inclusion in Schedule F.

### **Moawhango Ecological District**

20. There is no doubt that much, if not most, of this ecological district could be considered to be 'outstanding landscape'. However, the area includes a complex pattern of private and public land and without detailed mapping, followed by comprehensive consultation, it would be inappropriate to include the whole ecological district in Schedule F. DOC accepted the difficulties of inclusion for the Regional Council and proposed the inclusion of specified areas and features within the ecological district, as follows:

#### **Mt Aorangi with boundary amendments:**

21. While supportive of proposed boundary amendments I consider that to change the boundaries without consultation with affected parties, particularly iwi, would not be in accord with the principles we have agreed to follow.

#### **Reparoa Bog and the Makiriki Tarns**

22. These are located within the area DOC recommended for inclusion in the extended boundary of Mt Aorangi. While having merit as features within the wider landscape, Reparoa Bog and the Makiriki Tarns are likely to have limited merit as isolated features. Their merit would be best addressed within a wider assessment revisiting the boundaries of Mt Aorangi. I consider this to be beyond the scope of the current process in terms of consultation.

#### **Kutaroa and Otahupitara Swamps (Raketepauma Wetland System)**

23. Without more information and an assessment of these features, I am unable to comment on their merit.

#### **Hihitahi Forest Sanctuary**

24. The sanctuary is not within a currently mapped area in Schedule F and its inclusion is therefore problematic. While an assessment of the sanctuary may find merit in its inclusion as an outstanding area, this assessment has not been undertaken and

there is insufficient information available. Therefore, I cannot recommend its inclusion.

### **North-Western Ruahine Ranges**

25. DOC requested that features in the North-Western Ruahine Ranges be included in Schedule F. The requested additions involve private land and cannot be included without landowner consultation.

### **Eastern Desert Road**

26. The areas to the east of the Desert Road are part DOC land and part Defence Department land. There is little doubt that they have merit as outstanding landscapes and many would agree that they landscapes are an integral part of the wider central plateau landscape, and this wider area has an 'iconic' status. The area is extremely significant for Māori and most New Zealanders recognise the area as a defining feature of a distinctive New Zealand landscape. However, for the area to be included in Schedule F a very full and comprehensive consultation process would be required to establish the boundaries of a mapped area and to agree on the values to be listed.

## **NZ GEOPRESERVATION INVENTORY**

27. A review of the NZ Geopreservation Inventory was undertaken and listings that might constitute outstanding natural features or landscapes, but have not already been addressed, are discussed below. The Inventory provides a description of each feature with a classification. The classification code refers to assessments of:

#### **Importance:**

A = international  
B = national  
C = regional

#### **Vulnerability:**

1 = vulnerable to complete destruction by human actions  
2 = vulnerable to significant modifications by human actions  
3 = probably not vulnerable to any likely human actions  
4 = already destroyed by human actions

28. NZ Geopreservation Inventory listings that might constitute outstanding natural features or landscapes, but have not already been addressed:

### **Rangitikei Alluvial Terraces – list as a feature for Rangitikei River and River Valley**

29. "The best example in New Zealand of terrace system." (Classification A3) Map reference 220/250 sheet S23.
30. The listed terraces are captured in part by Figure F:7; not all terraces fall within the mapped area.
31. It is agreed that the terraces are an important feature and worthy of listing. At present they are listed for their contribution to 'visual and scenic' characteristics. I recommend that their scientific and educational values should also be listed.

### **Waitotara Ventifacts (Waitotara River mouth) – list as a feature in the coastal environment**

32. “An area of abundant ventifacts, this is the best example in the country. Classified as an extremely well defined landform of scientific/educational value.” (Classification B2) Map reference 545/490 sheet R22.
33. The Waitotara ventifacts are located within the mapped area of the western coast and should be listed in Schedule F as a feature with the values outlined in the Geopreservation Inventory.

### **Rangitikei Gorge**

34. “An impressive gorge occupying a 10-15 km stretch of the Rangitikei River. A good place to see stratifications and concretions. Classified as an extremely well defined landform of scenic value.” (Classification B3) Map reference 647/624 sheet T21.
35. This feature is already listed in Schedule F.

### **Rangitikei River Plio-Pleistocene Fossiliferous Sediments – list as a feature in the Rangitikei River and River Valley Landscape**

36. “One of the thickest Pleistocene sections in the world with diverse shell beds at intervals. Various shallow marine sedimentary processes displayed.” (Classification B3) Map reference 214/224 sheet S23.
37. This feature should be listed in Schedule F with the map reference.

### **Moawhango Gorge**

38. “An impressive gorge formed by rapid down cutting. The river is entrenched down to the greywacke basement, flowing west to east, it then forms an impressive gorge where the river abruptly changes direction to flow south through Tertiary sediments. Classified as an extremely well defined landform of scenic value.” (Classification C3) Map reference 595/658 sheet T21.
39. Although the gorge is undoubtedly an outstanding landscape feature, its inclusion without consultation with affected parties would be inappropriate.

### **Waihi Falls**

40. “On the Moawhango River, from 2 km north of Waitutahi Stream, to Erewhon Road, east of Waiouru.” (Classification C3) Map reference 862/803 sheet U24.
41. Although the Waihi Falls have considerable merit as an outstanding feature, their inclusion in Schedule F would be ill-advised without consultation with affected landowners.

### **Waitotara Estuary Fossil Forest – list as coastal outstanding landscape feature**

42. “Prominent remains of a totara forest that has been drowned and preserved by rising sea-level or local subsidence. Of considerable public interest and educational value.” (Classification C2) Map reference 547/501 sheet R22.



43. This feature is worthy of listing as a feature in the mapped area of the west coast and its scientific and educational values need to be noted.

#### **Mt Azim Gorge, Moawhango River**

44. “The most spectacular river gorge in the Moawhango Ecological Region, a region delineated by its distinctive and diagnostic natural landforms.” (Classification C3) Map reference 575/023 sheet T20.
45. Although Mt Azim Gorge has considerable merit as an outstanding feature, it cannot be listed without consultation.

#### **Raukawa Falls**

46. “Spectacular waterfall over bedded sandstone next to road.” (Classification C3) Map reference 086/730 sheet S21.
47. Raukawa Falls are located on private land and so cannot be included without landowner consultation.

#### **Owhaoko Plateau**

48. “Represents the maximum marine transgression in the late Miocene. An undeformed Miocene marine sequence, bounded to the east by the tectonically active Kaweka Ranges and Kaimanawa Ranges to the west. The Taupo eruption has controlled alluvial development. Contains the Ngamatea East Swamp – unique to the district. Classified as an extremely well defined landform of scientific/educational and scenic value.” (Classification B3) Map reference 793/985 sheet U20.
49. Although having merit in a landscape context, this feature is located on private land. Consultation with landowners and their support for its inclusion in Schedule F would be required.

#### **Oroua Valley Triassic Fossils**

50. “Best of only a very few fossil localities on the west side of Ruahine Range”. (Classification B3) Map reference 662/361 sheet T22.
51. This feature is located on private land. Although it may have merit in a landscape context, its inclusion without landowner consultation and agreement would be inappropriate.

#### **Karere Lagoon**

52. “Best example of the series of oxbow lakes along the Manawatu River. Classified as an extremely well defined landform of scientific/educational value.” (Classification C2) Map reference 544/587 sheet R22.
53. Karere Lagoon is a prominent landscape feature but is located on private land. Without landowner consultation and support it cannot be listed in Schedule F

## **Coonoor Karst, Makuri**

54. "Superb example of a karst landscape with hundreds of sinkholes, many visible from main road. Karst-developing limestones are rare in lower North Island." (Classification C3) Map reference 745/816 sheet U24.
55. While this feature may have merit for listing in Schedule F, its location on private land would make this inappropriate without the agreement of landowners.

## **LANDOWNER MATTERS**

### **Manawatu Gorge**

56. Tom Shannon, the owner of Nutcracker Farm in the Manawatu Gorge, made a submission on the POP requesting that part of his property included in the mapped area be removed. This section of his property is in productive pasture. As the area does not contribute directly to the value of the mapped area as an entity, and has no significant features, it was agreed to change the boundary to exclude it.

### **Manganui o Te Ao River and River Valley (and a series of inclusions and exclusions)**

57. At a mediation meeting with a group of landowners from this area it was agreed to exclude certain areas from the map in Schedule F after consultation with a landscape expert. I did not attend this meeting. The changes I made following the meeting were intended to reflect the agreements in principle while upholding the intent of the area's recognition as an outstanding natural landscape. Two of the key landowners/submitters have responded (via phone, email and letter) regarding clarification of the altered boundaries and expressed a willingness to attend further meetings to potentially change boundaries further. For various reasons these meetings have not taken place, so that the mapped boundaries remain unresolved.
58. The critical concern that landowners appear to share is the limitations such a listing might place on their farming activities. While recognising the very high values of landscapes and features in their area, and wishing to see these protected, they nevertheless wish to ensure that their farming activities continue to be viable and sustainable.
59. This case highlights the potential difficulties in recognising and providing for the Region's outstanding natural landscapes and features. There is a widespread misunderstanding of 'protecting' outstanding natural features and landscapes to mean absolute protection (in the conservation estate) sense of the word. In fact the RMA requires "protection from inappropriate subdivision, use, and development" and this need not be a constraint on existing management and use.
60. Many of the Region's more interesting and valued landscapes are an intimate mix of natural and cultural elements, are on private land, and are managed by farmers.
61. Far from being 'protected from use', protecting their values requires 'ongoing management and use' by farmers. While I consider the map I recommended in my initial s42(A) Report to be appropriate, I acknowledge there is a need to undertake further discussions with the concerned landowners/submitters (Winston Oliver and Sue and Gary Deadman) to resolve boundary and management issues and come up with solutions that sustain the interests of all parties, as well as the landscape's

values. On the basis outlined above I am keen to pursue further discussions through the hearing process.

## **EXPERT EVIDENCE**

### **Evidence of Brad Coombs**

62. In his evidence for Mighty River Power Brad Coombs raised a number of issues which were discussed in a mediation meeting between us on 11 May 2009 and in a further meeting with planners and Regional Council staff the same day. The issues raised in his submission, most of which were discussed at mediation, are addressed below:

#### **The need for a Region-wide assessment**

63. In his evidence Mr Coombs suggested that a Region-wide assessment was needed in order to accurately identify and map the Region's outstanding natural features and landscapes. Setting aside the issue of the resources required for such an assessment, it is my view that any assessment undertaken at such a scale would be unlikely to achieve its objectives.

64. In carrying out an assessment of landscapes there are essentially three phases:

- a. mapping of landscapes to highlight critical features, patterns and processes (natural and cultural);
- b. identifying the distinctive 'character areas' that make up a landscape and describing their defining features; and
- c. engaging with communities and interest groups to refine boundaries, ascribe values and agree management options. On the basis of consultation, map areas into the categories of landscape that reflect the intent of the RMA, then confirming the outcome of this mapping with communities and interest groups.

65. It is my view that this process is best carried out at a territorial level for three critical reasons:

- a. territorial authorities are best able to engage with local communities;
- b. without the full engagement of territorial authorities with their constituents, farmers in particular, they are unlikely to understand the process of assessing landscapes and commit to the outcomes of that assessment; and
- c. without ongoing and appropriate management, the value of the Region's landscapes are unlikely to be sustained. The responsibility for ongoing management is primarily that of territorial authorities. To fulfil this responsibility they must be committed. This commitment will only occur when those responsible have a vested interest in the process and its outcomes.

66. In my view, it would not be appropriate for the Regional Council to undertake a Region-wide assessment. In the interim (that is until territorial authorities undertake assessments) the mapped areas and schedules provided in the POP should be retained. NB: both Palmerston North City Council and Horowhenua District Council are currently undertaking assessments of their districts.

67. Mr Coombs suggests that an alternative to broad-scale assessment may be a case-by-case approach, assessing landscapes as required as a basis for making judgements about the likely effects of a particular resource consent application. The s32 analysis supports assessments to provide an overview of landscape values, and points out that case-by-case assessment is inefficient because there are no wider reference points against which to make a judgment of values and effects. This leads to uncertainty and ill-informed assessments, hence disputes and inefficiencies. A comprehensive assessment of the district that gives expression to what matters to the wider community provides a context of shared values and constraints, within which developers must operate. This provides greater certainty for developers and security for communities.
68. I agree that the Regional Council will need to review its listings of outstanding natural features and landscapes as territorial authority assessments are completed, and ultimately reconcile differences across the Region in order to ensure consistency. However, it is my view that in the first instance outstanding landscapes need to be recognised at a 'local' level; it is at this level that they assume greatest importance for communities. Their recognition at greater scales may give greater recognition to their significance but it may not necessarily add anything to their meaning.

### **West Coastline Map**

69. Mr Coombs produced a map of outstanding landscapes for the west coast, as an alternative to the map provided in the POP. Mr Coombs' map includes a much more limited area by shifting the boundary out towards the coast. It is his view that the POP map overstates the area of land that is outstanding. This issue was discussed at mediation on 11 May 2009.
70. I support the map that is included in the POP, while acknowledging that the boundaries are approximate and that a detailed assessment is needed. The Horowhenua District Council's draft landscape assessment has a map that includes a 'dune lakes landscape' as part of the coastal unit. This is recommended as 'outstanding' and so takes the boundary well inland from that currently shown in the POP. I also note that in Mighty River Power's evidence provided to the Board of Enquiry hearing the company's application for a resource consent to build the Turitea Wind Farm, Stephen Brown, a registered and very experienced landscape architect, includes his assessment of the Palmerston North City and Tararua District landscapes. He too provides a map showing what he believes to be either 'outstanding natural landscapes' or 'high amenity landscapes' on the west coast. Most of the area he maps is 'outstanding' but considerable areas are shown as having 'high amenity' value. The area covered by the two categories is similar to that included in the POP coastline map.
71. Given that Horowhenua District Council is already in the process of assessing the coastal landscape, and that there are varied views on what should and should not be included inside the mapped boundary, it is my view that the current map as proposed in the POP should be retained.

### **East Coastline and Cape Turnagain**

72. The boundary of the east coast map was questioned by Mr Coombs. His view was that the straight line boundary along a section of the Schedule F map is inappropriate and should better reflect the landform. After having the boundary explained as a line between high points he accepted the boundary as a fair

approximation of the inland limit of the 'outstanding landscape'. He noted that the more topographically defined edge of the rocky eastern coastline made it easier to identify boundaries than is the case along the western coastline with its dune landscapes.

73. I recommend that the map included in my initial s42A report, and initial Officer's Report February 2009, be retained unchanged.

### **Coastal Marine Area**

74. Mr Coombs questioned the use of the 12 nautical mile limit as the boundary of the coasts' 'outstanding natural landscape'. After some discussion, Mr Coombs agreed that this boundary made as much sense as any other. We agreed that the 12 mile limit was probably at the outer edge of the view for a person on the coastal edge.

### **Skyline**

75. Mr Coombs was of the view that 'sufficient distance', as used in the definition of 'skyline', was open to a wide range of interpretations. We were unable to agree an alternative means by which the intent of the policy might be achieved. In my view, the policy is clear: when you are seeing one of the highest ridges in the Tararua-Ruahine Ranges, you are clearly at a 'sufficient distance'. The test is what is seen rather than the distance from which it is seen. In the section of the ranges of interest to Mr Coombs, ie., the section above the Turitea Reserve, there are in fact a series of ranges and high spurs of varying elevations but each with very similar 'highest points'. A viewer moving away from the ranges sees an increasing number of high ridges and spurs, one behind the other. The distance over which a highest ridge can be see is therefore considerable.
76. My strong recommendation is that we retain the definition presented in the initial Officer's Report and my initial s42A report February 2009.

### **Values for Tararua Forest Park**

77. Mr Coombs was of the view that many of the values listed in schedules did not reflect the status of the areas they attached to, and that in some instances there was insufficient evidence to justify their inclusion. He noted the values attaching to the skyline of the Tararua Ranges as being limited to the visual and scenic. In his view this was not sufficient to justify its inclusion as an outstanding feature.
78. The Environment Court has accepted that not all of the Pigeon Bay Criteria need to be satisfied in order for a landscape or feature to qualify as 'outstanding'. For example, an 'outstanding feature' may be no more than a 'marker' in the landscape with historic significance. This matter was not discussed with Mr Coombs at our mediation meeting on 11 May 2009.
79. However, it remains my view that the characteristics and values listed in the Schedule, and those amendments to the characteristics and in the Officer's Report February 2009 are appropriate and sufficient to justify the areas and features noted or mapped as outstanding in the POP.

### **Tararua Forest Park Extension Area**

80. Mr Coombs was of the view that the area to the north of the Tararua Forest Park was not an outstanding landscape, as he interpreted my evidence. I was able to

clarify my evidence for Mr Coombs and agree with his view. I did not say that this area of the ranges was a regionally 'outstanding natural landscape'.

81. Mr Coombs' interpretation arose from viewing the map appended to my evidence showing the 300 metre contour, which he assumed to be the suggested boundary for the area. The map was included to illustrate the implications of accepting the suggestion (of a number of submitters) to use the 300 metre contour line as the lower boundary of an outstanding natural landscape to the north of the Tararua Forest Park. We both agreed that there were serious problems with such a suggestion and that it had little merit.

### **Assessment Criteria**

82. Mr Coombs comments (Paragraph 4.55 of his evidence) that the assessment criteria included in POP include "extrapolated explanations within the 'Pigeon Bay' assessment criteria".
83. He was able to clarify his concerns at mediation. He argued that the policy is currently confusing in implying that the Pigeon Bay Assessment Criteria are to be 'extrapolated' and used when making assessments for the purpose of a resource consent applications; this is what he interpreted Policy 7-7(c) to say. I agreed with Mr Coombs that the policy's intent is correct but the direction it gives can easily be misinterpreted.
84. The policy provides direction to assessments that territorial authorities might undertake, as well as assessments undertaken by applicants for resource consents. What we agreed needs to be made clear in the policy is that there are in fact two kinds of assessments:
  - a. assessments undertaken in accordance with the Pigeon Bay Criteria to establish the values in the landscape; and
  - b. assessments of the effects of a proposal on the landscape (in accordance with the Fourth Schedule of the RMA).
85. An applicant for a resource consent may be required to undertake both an assessment to establish the values in the landscape (using the criteria set out in the POP) and then an assessment of effects as set out in the Fourth Schedule. The policy needs to be clear on this matter.

Clive Anstey  
15 May 2009