

BEFORE THE GORE DISTRICT COUNCIL

IN THE MATTER

of a hearing on submissions to the Proposed Gore District Plan pursuant to clause 8B of the First Schedule to the Resource Management Act 1991

Hearing Stream 9 – Natural Features and Landscapes (NFL)

ON BEHALF OF

STONEY CREEK STATION LIMITED
(Submitter Number 3)

EVIDENCE OF BENJAMIN ESPIE
(LANDSCAPE ARCHITECT)

27th JANUARY 2025

1. INTRODUCTION

- 1.1** My name is Benjamin Espie. I reside in Queenstown. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the Southern Branch of the New Zealand Institute of Landscape Architects and was the Chairman of that branch between 2007 and 2016. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004, I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council (**QLDC**).
- 1.2** The majority of my work involves advising clients regarding the management of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development. The primary objective of these assessments and evidence is to ascertain the effects of proposed development in relation to landscape values and visual amenity.
- 1.3** Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in the rural areas of a number of districts. I have provided evidence to District Council and Environment Court hearings in relation to the landscape categorisation and landscape-related District Plan provisions regarding a number of South Island District Plans.
- 1.4** Although this is not an Environment Court hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note 2023 and agree to comply with it.

- 1.5 The methodology for my consideration and assessment as set out in this evidence has been guided by Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (**TTatM**)¹ and by the landscape related Objectives, Policies and provisions of the PDP.

2. SCOPE OF EVIDENCE AND THE WORKING GROUP

- 2.1 In relation to the Proposed District Plan (**PDP**), the relevant submission and further submission of Stoney Creek Station Limited (**SCSL**) relate to both Biodiversity (ECO Chapter) and Outstanding Natural Features and Landscapes (NFL Chapter). My evidence primarily relates to landscape issues and the corresponding NFL Chapter of the PDP.

- 2.2 The part of the Hokonui Hills (or Waterfall Range) that sits within the Gore District is identified as an Outstanding Natural Landscape (**ONL**) by both the Operative District Plan and the PDP. Stoney Creek Station is one of the two farming operations that manage almost all the land of this ONL (the other being Wantwood Station). I was engaged by SCSL to give advice on landscape matters after the lodgement of its submission (Submission 3) and its further submission (Further Submission 25). Beginning in July 2024, I was involved in a Working Group comprised of experts and representatives engaged by both the Gore District Council (**GSC**) and SCSL. The purpose of the working group is:

“to investigate the opportunity for a more bespoke or refined set of District Plan provisions that could apply to the Station in regard to the landscape and biodiversity”².

- 2.3 The work and process undertaken by the Working Group is described in the s42a report of Ms Banhidi³ and the associated landscape evidence of Mr Moore⁴. In short, after site visits, group meetings and email discussions, the Working Group arrived at an agreed planning regime to manage the Hokonui Hills ONL. That agreed regime is attached to Ms Banhidi’s s42a report as

¹ Te Tangi A Te Manu (**TTatM**), Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architecture, July 2022.

² Stoney Creek Station Working Group Terms of Reference, April 2024, appended to Ms Banhidi’s s42a report as part of Appendix D.

³ Hearing Stream 9, Natural Features and Landscapes Chapter, Section 42a Report, 19 December 2024.

⁴ Statement of Evidence of Mike Moore, dated 13 December 2024.

part of her Appendix D, which is a Record of Consensus of the Working Group. The planning regime that is now recommended by Ms Banhidi's s42a report (and supported by Mr Moore) is practically the same as the Working Group's agreed regime, although it includes some amendments in response to other submissions. I shall refer to Ms Banhidi's recommended regime of provisions as "the s42a regime". It includes the NFL Chapter and Appendix 5 to the PDP.

- 2.4** I support the s42a regime as an appropriate way of managing the ONL in relation to landscape values and visual amenity. In this evidence I set out my rationale for that. I have only specifically examined Stoney Creek Station and have not been on the land of Wantwood Station.

3. THE EXISTING LANDSCAPE OF THE HOKONUI HILLS AND ITS VALUES

- 3.1** Part of the s42a regime is an amended version of Appendix 5 to the PDP. That appendix describes the Hokonui Hills ONL and its landscape values⁵. To briefly paraphrase Appendix 5:

The Range is a very legible part of the broader Southland Syncline and a distinctive and memorable landform with its pattern of repeated pyramidal peaks and ridge forms.

The southernmost part of the ONL is public land that takes the form of Croydon Bush and Dolamore Park. ... The remainder of the ONL is managed under a predominantly pastoral farming land use regime and has been for many decades. The resultant grassland cover contributes to landform legibility and the managed, orderly aesthetic that is widely appreciated.

Strong cultural values are present in this landscape for mana whenua.

Given the majority of the ONL is private farmland, the community's appreciation of it is largely visual and from an external perspective.

Values to be protected:

⁵ TTatM defines landscape values at paragraph 5.6 and the glossary as "the reasons a landscape is valued – the aspects that are important or special or meaningful" and note that "values are embodied in certain attributes".

- *The geo-heritage values of the distinctive and memorable landform including the strike ridges and trellised drainage pattern.*
- *The ecological / biodiversity values associated with significant presence of indigenous vegetation cover.*
- *Ngai Tahu cultural landscape values associated with indigenous vegetation (habitat for indigenous fauna, mahinga kai, taonga species), waterways, and peaks (links with cultural histories and creation stories).*
- *Landmark values for Gore generally – The Hokonui Hills are a significant contributor to the identity of the District, and have value for recreational opportunities in a natural setting.*
- *Aesthetic values associated with memorable hill forms (including the distinctive pattern of pyramidal peaks and ridges) and natural or rural character.*
- *Perceptual values based on high natural landform legibility and landscape coherence (i.e. patterns of vegetation cover that reflect the natural landform and / or low stature, uniform grassland providing for landform legibility).*
- *Naturalness values based on the significant dominance of natural elements and patterns in the landscape and low influence of built form, human modification of landforms or lineal block or lines of exotic trees.*
- *The natural character of the area generally and in particular, of the visually prominent skylines and hillslopes.*

Potential threats to landscape values

- *Qualities of naturalness and wilderness as experienced from within the area.*
- *Quarrying / Earthworks that significantly erode the legibility of the natural landforms and the landscape coherence.*
- *Clearance of or damage to, areas of indigenous vegetation.*
- *Visually prominent buildings and structures.*
- *Visually prominent exotic forestry and shelter plantings.*

- *Lighting*
- *Alterations to the naturalness of waterways*
- *Pest plant and animal infestation*

3.2 In broad terms, the “values to be protected” bullet points above set out the reasons that the Hokonui Hills within the Gore District are valued by the community in a landscape sense. The perceptual values of the hills (their scenic and landmark qualities) stem from physical attributes (their geomorphology, land use pattern and vegetative cover). By far the most frequent way in which the hills are appreciated is via views from State Highway 94 (**SH94**). They are also seen from much less used roads such as Dolamore Park Road, Reaby Road and more distant locations, and also by intrepid walkers who ascend the public tracks to East Peak.

3.3 Except for Dolamore Park, Croydon Bush and the adjacent DOC land, the Hokonui Hills ONL within the Gore District is very largely managed by ongoing grazing and farming and has been for many decades. This is somewhat unusual for an ONL; generally speaking ONLs throughout New Zealand are less modified than this in terms of their land cover, often being minimally modified high country or wilderness areas. Even at higher altitudes within the Hokonui Hills, the dominant land cover is pasture, both improved and unimproved. This manner of management has created the open and legible landscape character and appearance that now exists and is appreciated. The perception of orderly management over most of the hills, allowing the dramatic landform to be readily perceived, is an important part of what the community appreciate and value.

3.4 I include a number of photographs to this evidence as Appendix 1 that illustrate the points made above. Further considerations are:

- i. From any given viewpoint, the skyline created by the hills is often the most recognisable and memorable aspect. The high, east-west running strike ridges form this visual skyline.
- ii. The relatively uniform dominant land cover of pasture grass means that landform and geomorphology is particularly legible. The ever-changing play of light and shadow in relation to the distinctive landform brings memorable transient aesthetic effects.

- iii. Over recent decades, farm management has (at considerable expense and effort) significantly reduced weed infestation, particularly by gorse. Future infestation is a threat to biodiversity, natural character and aesthetic appreciation of the ONL. This is recognised in the “potential threats to landscape values” listed in Appendix 5 and cited above. Encouraging ongoing farm management will control this threat.

3.5 Overall, I agree that the proposed Appendix 5 is a useful record of the attributes and values of the ONL. The hills are a memorable, recognisable landmark for the district.

4. THE PROVISIONS OF THE NATURAL FEATURES AND LANDSCAPES CHAPTER OF THE PROPOSED DISTRICT PLAN (PART 2.5.2)

4.1 Part 2.5.2 of the PDP is the Natural Features and Landscapes (NFL) Chapter. Appendix 5 to the PDP is relevant to that Chapter. The s42a version of these provisions is attached to Ms Banhidi's report. The key Policy is:

NFL-P1 Avoid adverse effects on the values and characteristics of identified outstanding natural features and landscapes described within Appendix 5 by:

1. *Avoiding development and land use that results in significant adverse effects on landscape values and avoiding or appropriately mitigating other adverse effects on landscape values.*
2. *Recognising the existence of working pastoral farms and their contribution to the openness and landform legibility of outstanding natural features and landscapes;*
3. *Demonstrating how development can be visually integrated into the landscape by:*
 - (a) *remedying or mitigating the impacts on the visual continuity of the Hokonui Hills Skyline and visually prominent hillslopes;*
 - (b) *ensuring buildings and structures are appropriately sited, designed, finished, and if required, mitigated by appropriate plantings, to have minimal impact on the landscape values.*

(c) ensuring that building density and form maintains the identified landscape values.

- 4. Avoiding activities that are incompatible with the identified values, including plantation forestry and mineral extraction,*
- 5. Ensuring values mana whenua associate with areas classified as outstanding natural features or landscapes are recognised and provided for in both classifying these areas and assessing the effects of activities in these areas.*

4.2 I consider that the Policy is appropriate in that it seeks to avoid adverse effects on the values of the ONL (which accords with Objective NFL-01) and it refers to Appendix 5, which then gives detail on those values. The Policy also goes on to highlight some factors that are likely to be important in relation to protecting ONL values. In doing so, the Rules of Part 2.5.2 are foreshadowed. This is not to say that all effects must be avoided (and clauses 1 to 5 make that clear) but adverse effects on the particular identified landscape values, set out in Appendix 5, are to be avoided.

4.3 The structure of the s42a regime Rules involves a mapped Lower Sensitivity Area (**LSA**) within the Hokonui Hills ONL. This is a sub-area of the ONL and can be seen on the map attached to Ms Banhidi's s 42a report and Mr Moore's report (and on my Appendix 3).

4.4 The Rules that apply to ONLs generally (i.e. not the LSA), are largely similar to the notified PDP version of the ONL provisions (excepting earthworks, as will be discussed). The Rules that apply to the LSA are then more enabling in relation to some activities. In essence, the motivation for this is to allow ongoing farming use and management of the ONL land to continue without unnecessary restrictions, provided the landscape values of the ONL are protected (as they are set out in Appendix 5 of the s42a regime). Through considerations of ecological sensitivity, geomorphological sensitivity and visual sensitivity, it was recognised and agreed by the Working Group that the mapped LSA area could accommodate some activities that the non-LSA ONL could not, while still protecting the values of the ONL overall.

4.5 The mapping of the LSA (as per the plans attached to the reports of Ms Banhidi and Mr Moore) is the result of an iterative process over a period of months involving a number of visits to the

site and surrounding landscape by myself and Mr Moore (both separately and together) and comprehensive discussions within the working group. In essence the final mapped LSA represents the area within the ONL that is somewhat less sensitive (in terms of ecology, geomorphology, and visibility). Again, this is appropriately described in Appendix 5 of the s42a regime.

- 4.6** Moving to the Rules, the s42a regime differs from the notified regime in that some activities are more enabled in the LSA part of the ONL than under the notified regime. The activities that are more enabled within the LSA are buildings/structures, tree planting, land disturbance and earthworks, farm quarries, and woodlots. I will discuss these matters in subsequent paragraphs.
- 4.7** The clearance of indigenous vegetation is another matter that is dealt with by the s42a regime (by Rule NFL-R6), however this rule simply provides for clearance in relation to permitted, consented or legally established activities. The more relevant regulation of vegetation clearance is found in Part 2.11, the Ecosystems and Indigenous Biodiversity (ECO) Chapter of the PDP and this is referenced in Rule NFL-R6. I understand that the Ecosystems and Indigenous Biodiversity Chapter is to be dealt with in Hearing Stream 10. Mssrs Davis and Wells are ecological experts that were part of the Working Group. As will be expanded upon in evidence that they provide, extensive work was done to arrive at an agreed set of provisions to appropriately manage biodiversity and ecology within the ONL, and those provisions will appear in the Ecosystems and Indigenous Biodiversity Chapter. Without going into detail or attempting to foreshadow the ecological evidence that will be provided, for current purposes, I consider that Rule NFL-R6 is appropriate since Rules ECO-R1 and R2 will appropriately regulate vegetation clearance, based on expert ecological assessment.

Buildings/structures

- 4.8** The s42a regime provisions allow for farm buildings as permitted within the LSA up to 175m² in footprint and 6m in height with a maximum reflectance value of external finishes being 30%. In effect, this provides for sheds of up to 4 bays, haybarns, etc. The reflectance value control will require darker, more muted colours such as Coloursteel Ironsand, Karaka or Thunder Grey. For utility, structures of this sort will be located on flatter ground and hence are likely to be on the valley floor parts of the LSA.

4.9 With reference to the LSA mapping, farm structures as described above will not be able to be seen from outside of the private farmland itself. In terms of landscape character, farm structures of this sort are part of the pattern of working farms and are not at odds with existing landscape character. If particularly large or high farm buildings are proposed (i.e. that breach the standards referred to above), a discretionary status will be triggered.

4.10 I consider that the provisions as per the s42a regime will protect the values of the ONL.

Tree planting

4.11 The s42a regime restricts tree planting⁶ in the ONL to indigenous species used for restoration or for short shelterbelts, however within the LSA, exotic tree planting is provided for, subject to being within 100m of a farm building or stockyard and is not of pest species. I am advised that tree planting of this sort will be important in providing shelter for farming operations around yards and associated spaces.

4.12 In relation to visual effects, again, tree planting within the LSA as provided for by the above provisions is very unlikely to be visible from outside the private farmland. Such shelter vegetation will be adjacent to yards or farm buildings, which will be on valley floor locations within the LSA part of the ONL. Potentially, some distant glimpses may be available for those who have walked to the top of East Peak. In relation to the landscape character of the LSA, inconspicuous instances of exotic shelter beside yards or farm buildings are not something that will discord with the rural, farming character that maintains the ONL. I consider that the provisions are appropriate in terms of protecting the ONL.

Land disturbance and earthworks

4.13 In relation to land disturbance and earthworks, following the work of the Working Group, the s42a regime has somewhat departed from the PDP's ONL provisions in that the notified Rule NFL-R6, which dealt with new roads and tracks has been deleted and effectively incorporated into the s42a regime's Rule NLF-R3. This recognises that the actual effects of roads or tracks stem from the earthworks associated with their formation, rather than the presence of a track per se. A

⁶ Tree planting excludes plantation forestry and woodlots, which are dealt with by separate provisions.

similar approach is taken in relation to fencing, with farm fencing⁷ being permitted but earthworks and land disturbance (whether associated with fencing or not) being regulated by s42a regime's Rule NFL-R3.

- 4.14** A key provision of the s42a regime is that earthworks within an ONL are permitted subject to the following standard:

The depth of the earthworks cut and/or earthworks fill shall not exceed 3m below/above the original surface of the ground, except that for fencing and tracking, this height may be exceeded for a distance of no more than 30m within any one 150m distance; and

- 4.15** The exceedance for fencing and tracking is slightly more permissive in the LSA. In practice, any earthworks that are undertaken on the station are going to be associated with fencing and tracking in the vast majority of instances (noting that mining, quarrying and farm quarries are dealt with by separate provisions).
- 4.16** With reference to the maps attached to Ms Banhidi's evidence as Appendix E (Hokonui Hills Mapping), specific Ridgelines are also identified, being the lines of the pronounced strike ridges that define the Hokonui Hills. The s42a regime provisions do not permit earthworks for roads within 30m of a Ridgeline (i.e. within a 60m wide strip) and do not permit any other earthworks within 30m of a Ridgeline if it exceeds 1m depth/height.
- 4.17** There was considerable discussion and assessment within the Working Group regarding these provisions relating to land disturbance and earthworks. SCSL stressed:
- i. that creating additional tracks and (in particular) fencing was vital to the ongoing management of the station. Their paddock sizes within the station are currently particularly large compared to similar farming operations and to get stocking working effectively, they need to divide current paddocks by way of fencing. Given that their topography is rarely flat, such fencing will involve earthworks.

⁷ The s42a regime Rule NFL-R5 remits post and wire fence; including deer fencing, waratahs and mesh fencing.

- ii. ongoing farming improvements of this sort are part-and-parcel of an effective farming operation. They are not a new thing being introduced to the landscape, they are part of the existing operation.
- iii. cuts and batters generally re-grass very well on the station; grass strike and growth being particularly successful here.
- iv. While necessary, fencing, track formation and associated earthworks are expensive. Any prudent farming operation will always seek to minimise earthworks as much as possible such that only what is necessary is done.
- v. When doing fencing and tracking work, given the rolling/sloping nature of the land, benching that allows suitable machinery to be used (which brings with it cut batters) is necessary in terms of safety when doing the work. Reducing that benching can cause safety concerns.

4.18 Notwithstanding the above, provisions must appropriately be formulated that protect the values of the ONL. I consider that key factors that led to consensus within the Working Group regarding earthworks provisions are:

- i. The ridgelines are the most sensitive parts of the Hokonui Hills ONL in terms of geomorphology and also very often in terms of visual appreciation. They give the hills their structure, memorable silhouette and overall appearance. Creating 60m wide strips around these ridgelines is a very useful protection.
- ii. Blending batters with surrounding natural landform and effective re-grassing (as required by the standards of NFL-3) are also very useful measures in terms of mitigating effects in relation to both geomorphology and potential visual effects. The provisions set a high standard for reinstatement.
- iii. The amount of fencing with associated cuts and batters that exists throughout Stoney Creek Station today is over 150km. The aspiration for additional new fencing that is contemplated by SCSL over the next 10 to 15 is in the region of 8km of new fencing in total. Therefore, the amount of fencing that is likely to actually be done is quite minimal.

In the scale of the ONL, it is likely to be lost (particularly if any within 30m of a ridgeline is done on a hole-by-hole basis without benching).

- iv. Fencing and tracking of the sort envisaged by Stoney Creek Station is vital in order to bring about the ecological outcomes that are discussed in the evidence of Mssrs Davis and Wells. Stock management to exclude animals from areas worthy of ecological preservation, and to bring about weed control via grazing in other areas, requires increased fencing.
- v. The potential for earthworks within the station to be visually perceived by the public is low. The ONL is appreciated visually generally at relatively long distances. In views of this sort, the magnitude of the ONL is very large. Part of its existing visual pattern is established tracks and fence-lines. Given the requirements regarding re-grassing, and the viewing distances involved, even batters of a reasonable height will become difficult to notice once reinstatement is done and will be lost in the overall magnitude of the view.

4.19 By way of further explanation of points (ii) and (v) above, Appendix 2 to this evidence is a series of photographs that show various earthworked cuts (some sizable) that have occurred on Stoney Creek Station over previous years under the ODP provisions (i.e. considerably unrestricted). Those activities have occurred as part of farm management and (in my consideration) have not caused degradation of the ONL; they are part of the ONL. Provision NFL-R3 requires that earthworks blend with natural landform and that re-grassing achieves 80% coverage by the end of the next growing season immediately following the completion of works. This will mean that, going forward, batters and re-grassing will have to be treated more carefully than has been the case up to now (even though those past batters are generally unproblematic); the finished treatment of batters will be more blended and better grassed.

4.20 Regarding point (v) above, the East Peak and Grant's Knob tracks (that can be seen on Appendix 3 to this evidence) are steep, ruggedly formed tracks, used by fairly intrepid walkers. The potential viewing audience from these tracks is of low numbers. When looking at Stoney Creek Station from East Peak, the central peak of the station with its Chorus telecom tower is a prominent element (as can be seen in Photograph 1 of Appendix 1). While tracks and fence-lines can be seen, they read as being part of the landscape, rather than a detraction. As discussed, this ONL is one that is characterised by farming, which is a dynamic (rather than static) attribute. Overall, the manner in which this ONL is appreciated is overwhelmingly via relatively distant

views from outside the ONL itself. In those views, the lack of earthworks on ridgelines, the relatively small amount of tracking/fencing that will be done within the scale of the station, and the blending and effective re-grassing of batters will very significantly mitigate potential visual effects of tracking/fencing earthworks, even if those go to a 3m height or more. Again, I consider that the S42a provisions will appropriately protect the values of the ONL. Potential effects of land disturbance and earthworks will be appropriately managed and, importantly, ongoing farming operations (which have brought about the visual and vegetative patterns that now exist) will be able to continue without unreasonable interference (as per the working Group Terms of reference⁸).

4.21 In this regard I take support from Mr Moore's evidence that the provisions are appropriate because:

- *"They recognise the pastoral rural character and the fact that earthworks are required for management of the land. Fence and track lines, whilst detracting from natural values, are a part of the existing rural character of much of the ONL.*
- *Onerous standards that do not recognise the realities of the topography and of farming operations will result in the need to obtain resource consents at cost to the landowners, and it is more appropriate to build in the remediation measures into the rules. In this case, I consider that the standard requiring at least an 80% re-grassing coverage by the end of the next growing season will be an effective measure, controlling the adverse effect of greatest significance – i.e. the visual scarring effect of unvegetated batter slopes.*
- *The rules appropriately protect the ridgeline areas which are the features of greatest sensitivity*⁹.

Farm quarries

4.22 While non-complying in the ONL generally, Rule NFL-R7 of the s42a regime provides for farm quarries subject to the following standards:

1. *the total area of extraction open at any one time does not exceed 1,500 m²; and*

⁸ Stoney Creek Station Working Group Terms of Reference, April 2024, appended to Ms Banhidi's 242a report as part of Appendix D.

⁹ Statement of Evidence of Mike Moore, dated 13 December 2024, paragraph 20.

2. *the activity is set back 100m from any side or rear boundary; and*
3. *the activity is not visible from a formed public road or other public viewpoint; and*
4. *the area is progressively stabilised, filled or recontoured when exhausted of material.*

4.23 Stoney Creek Station currently has one farm quarry in operation which has a limited life. Farm quarrying is a small but essential part of ongoing operations. At some time in the future, it is likely to be necessary to close and rehabilitate the current quarry and begin a new one. Again, a quarry of this scale is part-and-parcel of a farming operation and is not something that is discordant with expected landscape character. However, if in a visually conspicuous location, it could adversely affect the values of the ONL. The s42a regime provisions are appropriate in that scale is controlled, progressive filling and recontouring is required and, perhaps most importantly, a quarry must be invisible in relation to public views. I consider that these provisions allow for farm quarrying in a managed way such that the ONL will not be adversely affected.

Woodlots

4.24 Pursuant to the s42a regime, plantation forestry (as defined in the PDP) is a non-complying activity. Woodlots by definition exclude plantation forestry and hence are smaller stands of trees for firewood, erosion control, etc. In the ONL generally, these are non-complying but in the LSA, they are provided for as restricted discretionary. A matter of discretion is the effects on the ONL landscape values as set out in PDP Appendix 5, and the over-arching Objective and Policies require these values to be protected.

4.25 As has been discussed, the LSA is generally well hidden from public views, occupying the inner valleys of the landform. Opportunities to perceive trees within the LSA are considerably limited and are at significant distances (such as from East Peak). Distant visibility of a small stand of trees within a valley-floor part of the landform will not be degrading to visual amenity or landscape values. It will accord with existing and expected patterns. I consider the provisions are appropriate.

5. CONCLUSIONS

- 5.1** Following submissions, further submissions and the work of the Working Group, the s42a report of Ms Bandhini recommends an amended regime of provisions relating to ONLs, consisting of the NFL Chapter and Appendix 5 to the PDP. I support that regime.
- 5.2** The Hokonui Hills within the Gore District are appropriately categorised as an ONL and their landscape values are suitably recorded in Appendix 5 of the s42a regime. The Hokonui Hills are somewhat unusual in relation to ONLs generally, in that they have been managed by farming and grazing for many decades such that improved pasture land cover is dominant, even at higher altitudes.
- 5.3** The s42a regime differs from the notified regime in that it identifies a mapped LSA that covers the internal valleys within the Hokonui Hills and applies somewhat more enabling provisions to this area in relation to buildings/structures, tree planting, land disturbance and earthworks, farm quarries, woodlots and vegetation clearance. Notwithstanding that, over-arching Objectives and Policies apply which require the landscape values of the ONL to be protected.
- 5.4** Through assessment and consideration that has formed my input into the Working Group and through visits to the Hokonui Hills and the surrounding landscape, I am in agreement with Ms Banhidi and Mr Moore that the S42a regime will appropriately manage activities within the ONL such that its landscape values are protected. Provisions will allow ongoing farming management to continue, which will maintain the landscape in the way that it has been over past decades, without adversely affecting its values.

ATTACHED APPENDICES

- 1 PHOTOGRAPHS OF THE HOKONUI HILLS ONL
- 2 PHOTOGRAPHS OF CUTS AND BATTERS WITHIN STONEY CREEK STATION
- 3 PUBLIC LAND IN RELATION TO THE HOKONUI HILLS ONL

Ben Espie - vivian+espie - 27th January 2025



Photograph A: From East Peak looking northwest into Stoney Creek Station with the communications tower on the central peak (at 666m) in the centre left of the image (partly in cloud). No part of the Lower Sensitivity Area can be seen in this view.



Photograph B: From Reaby Road close to the intersection with Campion Road, 5.7km southeast of the central peak of Stoney Creek Station. The strike ridges are seen end-on, with the distinctive saddles between.

GORE PDP - HEARING STREAM 9 - ESPIE LANDSCAPE EVIDENCE - APPENDIX 1: PHOTOGRAPHS OF THE HOKONUI HILLS ONL

Photographs in this appendix have been taken with a fixed focal length of 50mm. Photographs are intended to illustrate points made in this evidence.



Photograph C: From the southern part of Whiterig Road, 9.1km east of the central peak of Stoney Creek Station. The memorable silhouette of the Hokonui Hills is evident.



Photograph D: From Otama Road near Chatton, 7.9km northeast of from the central peak of Stoney Creek Station. The strike ridges are now seen horizontally with darker vegetation seen lining some of them. The valleys between the ridges are concealed.



Photograph E: From the intersection of Two Chain Road and Riversdale-Pyramid Road, 18km northwest of from the central peak of Stoney Creek Station. The Hokonui Hills form a backdrop skyline in views from the Waimea / Mataura plains.



Photograph A: A 2m high cut in grazed paddock at the northeastern end of Stoney Creek Station on the front face of the hills overlooking SH94. The cut was made with minimal deliberate rehabilitation and has re-grassed naturally.



Photograph B: The same cut as viewed from SH94 at a distance of 600m. The relevant track crosses the hillside that is central in this view.

GORE PDP - HEARING STREAM 9 - ESPIE LANDSCAPE EVIDENCE - APPENDIX 2: PHOTOGRAPHS OF CUTS AND BATTERS WITHIN STONEY CREEK STATION

The cuts and batters shown in these photographs have been done within the station over past years as permitted activities pursuant to the ODP. No planning regulations required landform blending or revegetation. Despite this, batters have re-grassed well and are very inconspicuous from outside the station itself. The s42a regime would place new, more stringent requirements on batters of this sort.

Photographs in this appendix have been taken with variable focal lengths and are not intended to reproduce the scale of image taken in by the human eye from the relevant viewpoints. Photographs are intended to illustrate points made in this evidence.



Photograph C: A 6m high cut in the internal parts of Stoney Creek Station. The batter has been laid back at 27° and has revegetated well despite minimal effort.



Photograph D: A 3m high cut in grazed paddock at the northwestern end of Stoney Creek Station on the front face of the hills overlooking SH94. Again, the cut was made with minimal deliberate rehabilitation and has re-grassed naturally.



Photograph E: A 3m high cut in grazed paddock near the northwestern end of Stoney Creek Station overlooking SH94. Again, the cut was made with minimal deliberate rehabilitation and has re-grassed naturally.



Photograph F: The same cut as viewed from SH94 at a distance of 1400m. The relevant track crosses the hillside that is central in this view, immediately below the lowest conifer.



Photograph G: A 5m high cut in grazed paddock near the central northern part of Stoney Creek Station. Minimal deliberate rehabilitation has been done and batters have re-grassed naturally.

