

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-285

Under	the Resource Management Act 1991 (RMA)
In the matter of	an appeals under clause 14(1) of the First Schedule of the RMA in relation to the proposed Second Generation Dunedin City District Plan (2GP)
Between	The Preservation Coalition Trust Appellant
And	Dunedin City Council Respondent

Affidavit of Rhys James Girvan

Affirmed *26 July* 2021

DCC Reference numbers 75 and 82

Respondent's solicitors:

Michael Garbett | Georgia Cassidy
Anderson Lloyd
Level 10, Otago House, 477 Moray Place, Dunedin 9016
Private Bag 1959, Dunedin 9054
DX Box YX10107 Dunedin
p + 64 3 477 3973 | f + 64 3 477 3184
michael.garbett@al.nz | georgia.cassidy@al.nz

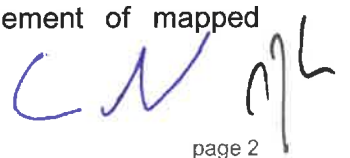
anderson
lloyd.

I, **Rhys James Girvan** of Christchurch, Senior Principal Landscape Planner, hereby solemnly and sincerely affirm:

- 1 I have a master's degree in landscape architecture and I am a registered landscape architect, employed by Boffa Miskell as a Senior Principal: Landscape Planner. I have practiced as a landscape planner for over 17 years; having previously worked for Queenstown Lakes District Council and a large multi-disciplinary planning and design practice in the United Kingdom.
- 2 My experience includes preparing area-based landscape and natural character assessments to inform statutory plans for District and Regional Councils and the assessment of development projects of many scales from residential developments to large scale infrastructure and mining projects. I have been a landscape planning consultant with Boffa Miskell since April 2012, providing consultancy services for a range of clients in the South Island, lower part of the North Island and other parts of New Zealand.
- 3 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
- 4 I have been engaged by Dunedin City Council (**Council**) to assess landscape overlays included in the proposed Second Generation Dunedin City District Plan (**2GP**) applied across the Otago Peninsula and adjoining land to the north-west of Otago Harbour.

Overview of Reports

- 5 The report '*2GP Landscape Overlays: Review of landscape overlays in Otago Peninsula*' (**Report**) provides a 'second opinion' of recommended changes to the 2GP identified through expert conferencing following an appeal from The Preservation Coalition Trust (**PCT**) alongside consideration of *Site Specific Appeals* identified within landscape overlays. This Report is attached at **Annexure 1** to this affidavit.
- 6 Differences between the landscape evaluation addressed through PCTs appeal and the notified 2GP landscape overlays relate to 12 identified areas within Otago Harbour and the adjoining land to the north-west. Whilst some changes to landscape overlays are supported along the harbour's ridgetops and islands as coherent outstanding natural landscapes (ONLs), parts of Otago Harbour and Pūrākaunui Inlet are considered to form significant natural landscapes (SNLs) as currently defined within the 2GP with some localised refinement. Such modification and refinement of mapped



landscape overlays and associated description of landscape values has subsequently been agreed with PCT's landscape expert, Di Lucas, and representatives from Ōtākou and Puketeraki Runaka.

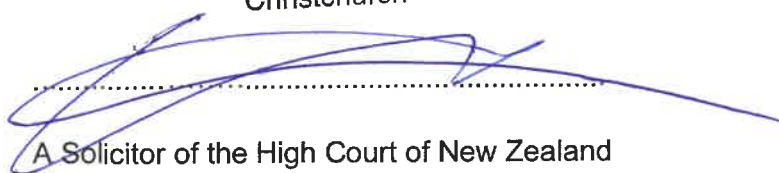
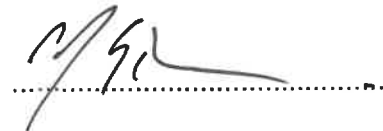
- 7 Alongside the review of suggested amendments to landscape overlays, eleven site specific appeal sites have also been considered in terms of their ability to be removed from landscape overlays and/or 'upzoned' to enable more intensive levels of development from existing rural or rural-residential zoning. The existing 2GP landscape evaluation is generally supported in relation to site-specific appeal sites, particularly where SNLs have been identified or omitted. Given this context, some capacity to accommodate sympathetic rural residential opportunities has been identified along lower and more modified contexts, typically in parts of the inner Otago Harbour adjoining the Cove and within the context of existing development to the south of Blueskin Bay. Elsewhere, more limited opportunities for 'upzoning' have been identified, particularly along more visible middle and upper slopes within the Otago Harbour and in North East Valley.

Affirmed at Christchurch)

By Rhys James Girvan)

this 5th day of July 2021)

before me **Lucian Cescon Nightingale**)
Solicitor
Christchurch



A Solicitor of the High Court of New Zealand



2GP Landscape Overlays

Review of landscape overlays in Otago Peninsula
Prepared for Dunedin City Council

5 July 2021

EXHIBIT NOTE

This is the annexure marked "1" referred to in the within affidavit
of **Rhys James Girvan** and affirmed at Christchurch this ²⁶
day of July 2021 before me. **Lucian Cescon Nightingale**

Solicitor

Signature  Christchurch.....
A Solicitor of The High Court of New Zealand
(Solicitor to sign part on Exhibit)



Document Quality Assurance

Bibliographic reference for citation: Boffa Miskell Limited 2021. <i>2GP Landscape Overlays: Review of landscape overlays in Otago Peninsula</i> . Report prepared by Boffa Miskell Limited for Dunedin City Council.		
Prepared by:	Rhys Girvan Senior Principal: Landscape Planner Boffa Miskell Limited	
Reviewed by:	Yvonne Pfluger Associate Partner: Landscape Planner Boffa Miskell Limited	
Status: [FINAL]	Revision / version: [2]	Issue date: 5 July 2021
Use and Reliance This report has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Boffa Miskell does not accept any liability or responsibility in relation to the use of this report contrary to the above, or to any person other than the Client. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate, without independent verification, unless otherwise indicated. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.		

Template revision: 20180621 0000

File ref: BM200702_Method_Review_20210705.docx

Cover photograph: [Inner Otago Harbour viewed from Highcliff Road, © BML, 2020]

Executive Summary

Boffa Miskell were engaged by Dunedin City Council to assess 2GP landscape overlays applied across the Otago Peninsula and adjoining land to the north-west of Otago Harbour. This report provides a 'second opinion' of recommended changes to the 2GP identified through expert conferencing following an appeal by the Preservation Coalition Trust (PCT).

Differences between the landscape evaluation addressed through PCTs appeal and the notified 2GP landscape overlays relate to 12 defined areas within Otago Harbour and the adjoining land to the north-west. Whilst some changes in landscape evaluation along the harbour's ridgetops and islands are supported as coherent outstanding natural landscapes (ONLs), parts of Otago Harbour and Pūrākaunui Inlet are considered to represent significant natural landscapes (SNLs) as currently defined in the 2GP.

Similarly, whilst SNLs are considered to follow MHWS in some contexts, particularly in parts of the outer Otago Harbour and at the entrance to Blueskin Bay, other parts of the harbour edge are considered modified or an integral part of underlying Native Reserve which confines extensions of landscape overlays in these areas. More generally, the Township and Settlement Zone is not uniformly considered to form a coherent an SNL boundary, particularly given the apparent modification including rural lifestyle land use which extends beyond such areas along the harbour's edge. In this respect, findings of the previous 2GP landscape assessments are supported.

The existing 2GP landscape evaluation is generally supported in relation to site-specific appeal sites, particularly where SNLs have been identified or omitted. Given this context, some capacity to accommodate sympathetic rural residential opportunities has been identified along lower and more modified contexts, typically in parts of the inner Otago Harbour and part of Blueskin Bay. Elsewhere, more limited opportunities for 'upzoning' have been identified, particularly along more visible middle and upper slopes within the Otago Harbour and in North East Valley.

CONTENTS

Executive Summary	i
1.0 Introduction	1
2.0 Background	1
2.1 Landscape Overlays in Operative District Plan (2006)	1
2.2 Dunedin LMA Review (2007)	2
2.3 The 2GP Landscape Assessments (2013 – 2017)	2
2.4 Joint Witness Statement Landscape Assessment (2020)	4
2.5 Site Specific Appeals	4
3.0 Peer Review Methodology	5
3.1 Area Based Landscape Assessment Process	6
3.2 Scope	7
3.3 Landscape Attributes	8
3.4 Ratings and Thresholds	9
3.5 Landscape Evaluation - Mapping Landscape Values	11
3.6 Landscape Baseline and Provision for Urban Growth	12
4.0 Landscape Evaluation Peer Review Method	12
5.0 Otago Harbourside	14
5.1 Area 1: Outer Harbourside Edge (Northern side)	15
5.2 Area 2: Peninsula Coast / Otago Harbour Ridgeline	16
5.3 Area 3: Harbour Islands and Portobello Peninsula	18
5.4 Area 4: Outer Otago Harbourside Edge (Southern Side)	18
5.5 Outer Otago Harbourside - Site Specific Appeals	19
5.6 Area 5: Inner Peninsula Bays	21
5.7 Area 6: Inner Otago Harbourside Edge (Northern Side)	22
5.8 Inner Otago Harbourside - Site Specific Appeals	23
6.0 Heyward Coast	26
6.1 Area 7: Mihiwaka to Heyward Coast	27
6.2 Area 8: Pūrākaunui and Ōrokonui	28
7.0 Flagstaff and Mount Cargill	29
7.1 Area 9: Mihiwaka	30
7.2 Area 10: Mount Cargill	30
7.3 Area 11: Part of Flagstaff / Mount Cargill SNL	31

7.4	Flagstaff and Mount Cargill - Site Specific Appeals	31
8.0	Waikouaiti Coast and Hills	34
8.1	Area 12: Doctors Point	35
8.2	Waikouaiti - Site Specific Appeals	35
9.0	Conclusion	36
10.0	References	37

Appendices

Appendix 1: Differences in Landscape Attributes Applied

Appendix 2: Landscape Evaluation

Maps

Map 1: Landscape Overlays in the operative Dunedin City Council District Plan (2006)

Map 2: 2GP Landscape (2017)

Map 3: JWS Landscape (2020)

Map 4: Landscape Character Areas as identified in the LMA Review (2007)

Map 5: Location of Site-Specific Appeal Sites

Map 6: Agreed Landscape Evaluation

Figures (Bound Separately)

Figure 1: Amended Landscape Overlays

Figure 2: Outer Otago Harbour

Figure 3: Inner Otago Harbour

Figure 4: Heyward Coast

Figure 5: Flagstaff Mount Cargill

Figure 6: Waikouaiti Coast and Hills

Figure 7: ONLS and SNLs

1.0 Introduction

Dunedin City Council (DCC) engaged Boffa Miskell to review landscape overlays included in the Proposed Second-Generation Dunedin City District Plan (2GP) in relation to Otago Peninsula and an area of adjoining land to the north-west of Otago Harbour. Specifically, this review considers the basis for which landscape overlays have been refined through expert conferencing in response to the Preservation Coalition Trust (PCT) appeal. Such overlays relate to outstanding natural landscapes (ONLs) and significant natural landscapes (SNLs).¹

Through prior expert conferencing between landscape architects representing PCT (Di Lucas) and DCC (Mike Moore), significant changes were identified compared with landscape evidence previously informing the notified 2GP². This report reviews the landscape methodologies which informed landscape evaluations represented in the 2GP and applied during subsequent expert conferencing to provide an independent 'second opinion' as to the evaluation and delineation of landscape overlays. This exercise has included a landscape evaluation of the area subject to this appeal, conferencing with PCT's landscape expert Di Lucas and a hui with representatives from Ōtākou and Puketeraki Runaka, and subsequent agreement with revised landscape overlay boundaries.

Alongside the review of suggested amendments to landscape overlays, eleven site specific appeal sites have also been considered in terms of their ability to be removed from landscape overlays and/or 'upzoned' to enable more intensive levels of development from existing rural or rural-residential zoning. The adequacy of any additional planning provisions within Rural Residential zones to achieve appropriate landscape management has not been addressed in landscape evidence relating to PCT's appeal nor this report.

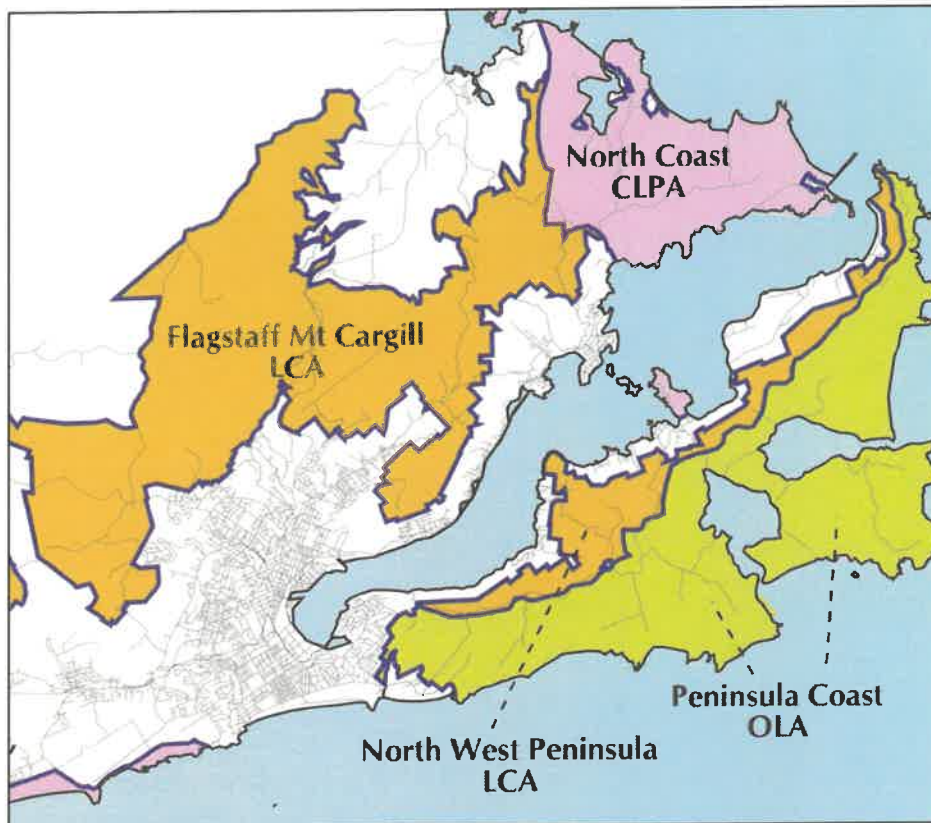
2.0 Background

2.1 Landscape Overlays in Operative District Plan (2006)

The Operative District Plan (2006) previously identified landscape conservation areas as part of the established management of recognised landscape values within Dunedin City. This included identification of an 'outstanding landscape' encompassing the Peninsula Coast Outstanding Landscape Area. Additional overlays in this area of Dunedin City included the North Coast Coastal Landscape Preservation Area, the North West Peninsula Landscape Conservation Area and the Flagstaff Mt Cargill Landscape Conservation Area (see **Map 1**).

¹ It is understood that the JWS supports classification of Portobello Peninsula as an Outstanding Natural Landscape and identification as an Outstanding Natural Feature is no longer subject to appeal as set out in the fourth amended notice of Appeal (21 September 2020).

² Mike Moore (2012-1017)



Map 1: Landscape Overlays in the operative Dunedin City Council District Plan (2006)

2.2 Dunedin LMA Review (2007)

The Dunedin Landscape Management Area (LMA) Review was undertaken to review LMA's previously identified in the Operative Dunedin City District Plan. LMAs were adopted by DCC to identify Dunedin's significant landscapes, described as:

An area defined in terms of particular landscape character with particular objectives, policies and rules which aim to protect these areas from inappropriate development as defined by the RMA.

To inform this landscape evaluation, the LMA initially identified 18 landscape character areas which make up the entire Dunedin District, five of which are located within Otago Peninsula and the land to the north-west of Otago Harbour subject to this assessment. Such landscape character areas omit any finer scale characterisation within the urban extent of Dunedin City. Each landscape character area was then assessed to inform landscape management zones, with such areas and sub-areas assessed as having 'outstanding', significant or 'coastal amenity' values. Such evaluation and mapping of landscape values has been explicitly referred to in the 2GP landscape assessments.

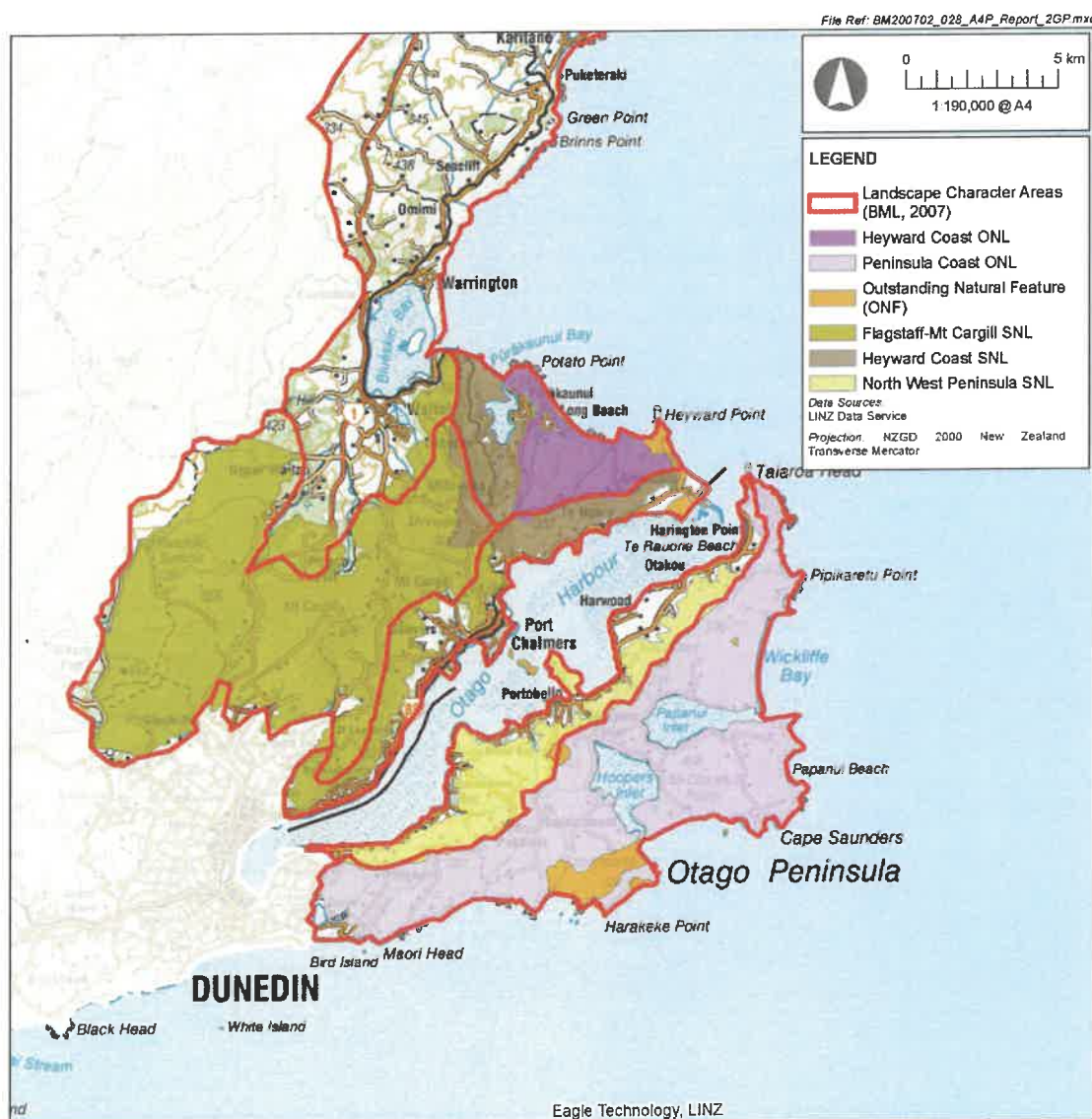
2.3 The 2GP Landscape Assessments (2013 – 2017)

The 2GP Landscape Assessments (Moore, 2013 - 2017) represent a series of landscape evaluations confirming the extent and values of landscape overlays carried into the 2GP. This includes identification and analysis of relevant landscape attributes and refinement of landscape overlays previously defined in the Operative District Plan (2006).

The scope of the 2GP Landscape Assessments entailed the entire Dunedin District. This resulted in the subsequent classification of Dunedin's landscapes into ONLs and second tier 'significant natural landscapes' which deserve particular regard under section 7 of the RMA. The methodology applied, entailed a review of existing landscape management areas identified in the Operative District Plan as the basis for identifying and mapping where important landscape values occur.

2.3.1 2GP Hearing Process

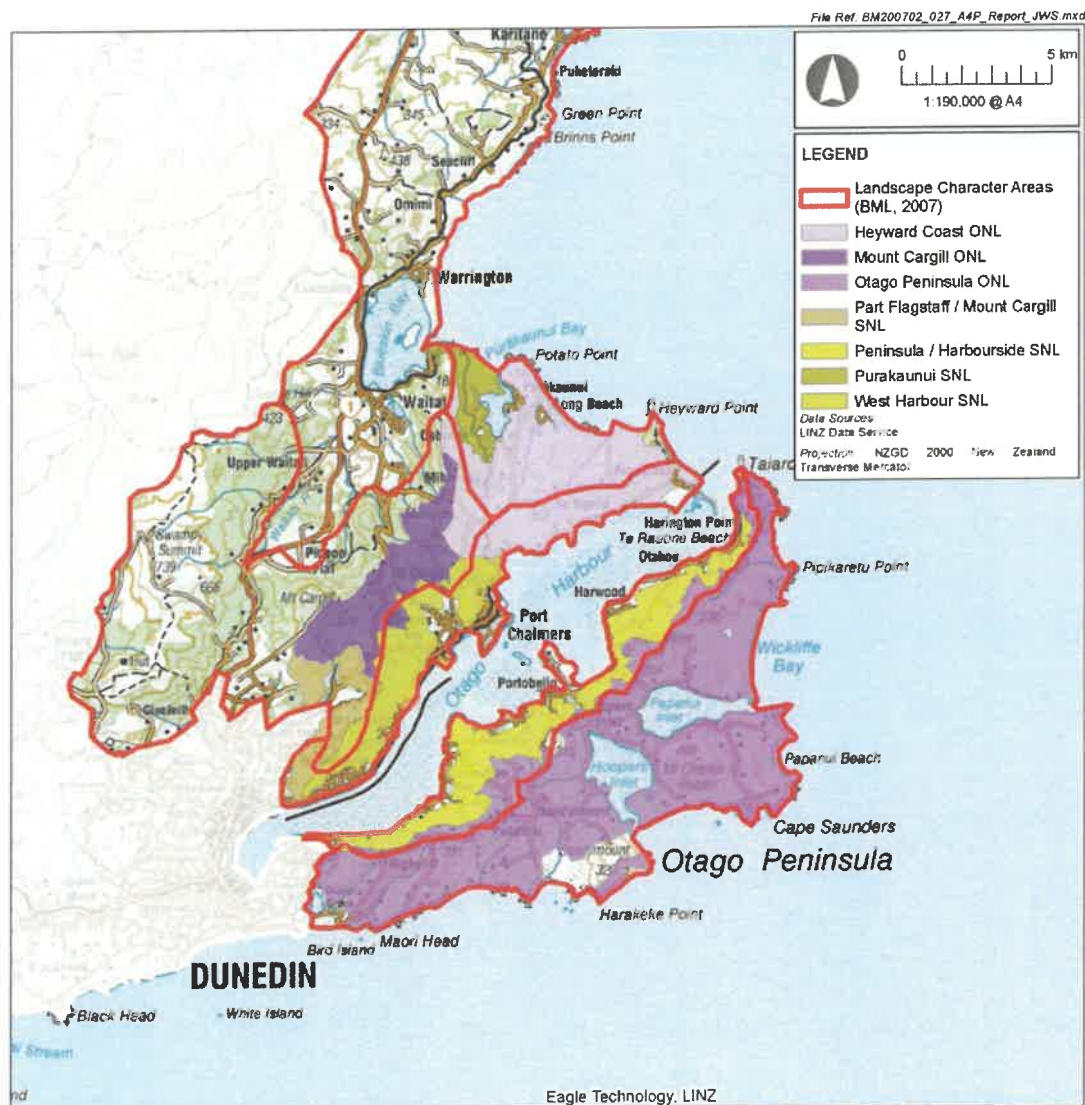
Mike Moore has previously responded to PCT's submission relating to landscape overlays associated with Otago Harbour during hearings held in relation to the 2GP. Key issues considered at this time included whether the areas that are currently SNLs should be upgraded to ONLs, and if so, whether the current overlay boundaries should be adjusted. With the exception of an extension of ONL in part of the Heyward Coast landscape character area, landscape overlays representing the '2GP Landscape Assessments' were upheld (see **Map 2**).



Map 2: 2GP Landscape Assessment (2017)

2.4 Joint Witness Statement Landscape Assessment (2020)

Following the 2GP hearings, a Joint Witness Statement (JWS Landscape Assessment, 2020) prepared by Di Lucas and Mike Moore recommended changes in the way landscapes are assessed and subsequently mapped. Such changes are supported by a broader list of factors and explicit ratings applying a seven-point scale. The witnesses agreed that the areas identified as ONL and SNL in the JWS maps are of an adequate spatial scale to read as landscapes and identified a total of 7 landscapes across the Otago Peninsula and adjoining land to the north to replace the current landscape evaluation included in the 2GP (see **Map 3**).



Map 3: JWS Landscape Assessment (2020)

2.5 Site Specific Appeals

As part of this review, DCC have also requested a review of the landscape implication of 'upzoning' and/or landscape characterisation applied in relation to the following site-specific appeal sites (see **Map 4**):

- A. 33 Otakou Golf Course Road (Appeal Point 126)

- B. 33 Otakou Golf Course Road (Appeal Point 364)
- C. 25A Irvine Road (Appeal Point 9)
- D. 457 Highcliff Road (Appeal Point 109)
- E. 603 Highcliff Road (Appeal Point 67)
- F. 48 Raynbird Street (Appeal Point 180)
- G. 231, 233 and 235 Signal Hill Road (Appeal Points 21 and 378)
- H. 43 Watts Road (Appeal Point 14)
- I. 135 and 145 Doctors Point Road (Appeal Point 17)



Map 4: Location of Site Specific Appeal Sites

3.0 Peer Review Methodology

In undertaking this peer review, an initial step involved reviewing changes between the landscape assessment methods applied in the 2GP Landscape Assessments and the JWS

Landscape Assessment. This identified the following key differences in terms of applying a suitable area-based landscape assessment method:

- Scope and assessment scales
- Identification and application of landscape attributes
- Application of ratings and thresholds
- Differences in mapping approaches
- Understanding the existing landscape baseline

3.1 Area Based Landscape Assessment Process

The Section 32 analysis supporting notification of the 2GP³ recognises the role of area based landscape assessments to identify and assess Dunedin's landscapes, noting such assessments can be carried out at regional, district, city or catchment scales. The following aspects are generally accepted as best practice when undertaking an area-based landscape assessment process⁴:

3.1.1 Landscape Description/Inventory

'Landscape description' involves a process of data compilation during which the layers or components that make up a landscape are identified. In New Zealand, 'land typing' has proved a useful basis from which such information has been gathered. This can include maps of landform, soil, geology, drainage patterns, vegetation cover, land uses, built development, infrastructure, heritage sites, cultural meaning and associations etc., to build up a layered understanding of landscape attributes. The additional geology and Wāhi Tupuna maps included in the JWS landscape assessment are examples of landscape description / inventory.

3.1.2 Landscape Characterisation

Landscape character is derived from a combination of landscape components (i.e. landform, land cover and land use) that makes one area different from another. It normally follows a process of landscape description. It is not concerned with ranking or evaluating landscapes or identifying which areas of landscape are better or worse. 'Landscape characterisation' is the term used for the process of identifying, mapping and describing landscape character areas. Each character area has a distinguishing combination of biophysical and cultural factors that make it distinctive. Such district wide landscape characterisation previously identified 18 landscape character areas within Dunedin District within the LMA Review (Boffa Miskell, 2007).

3.1.3 Landscape Evaluation

Landscape evaluation (i.e. assigning value) is undertaken to identify and map important natural features and landscapes. The reasons for being considered important or the

³ Dunedin City District (September, 2015) Landscape Section 32 Report, Proposed Second Generation Dunedin City District Plan

⁴ Quality Planning: Landscape Assessment, Retrieved 20 October 2020 from <https://www.qualityplanning.org.nz/node/805>

important characteristics of given landscapes should be clearly defined, including with reference to RMA 6(b) or 7(c) which apply. Overall judgements rely on landscape evaluation, based on but distinct from the relatively value-free process of differentiating between landscape character areas.

Whilst the process of landscape evaluation relies on the information gathered during landscape description/ inventory and landscape characterisation, it is important to note that the boundaries resulting from landscape evaluation do not necessarily coincide with landscape character areas. Landscape evaluation boundaries can overlap landscape character areas, occur entirely within a landscape character area, or share common boundaries either in part or in their entirety (see **Diagrams 1 to 4** below).

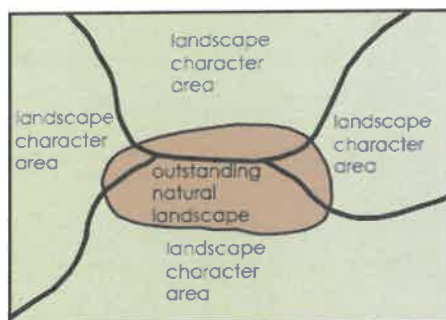


Diagram: 1

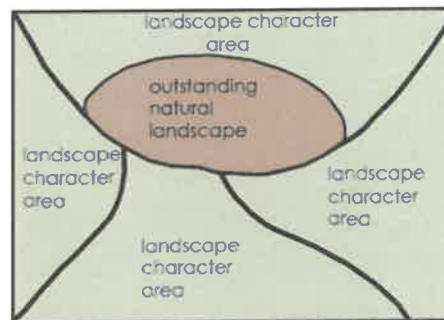


Diagram: 2

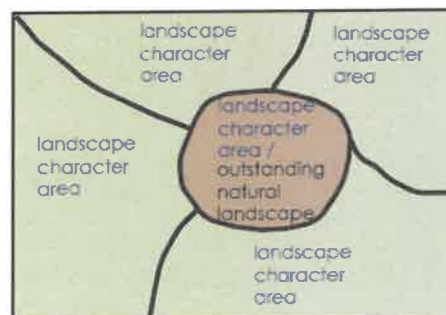


Diagram: 3

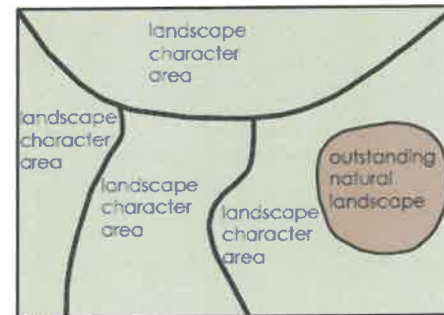


Diagram: 4

3.2 Scope

The scope of the 2GP Landscape Assessments entailed a district-wide review of a previous landscape evaluation which identified Landscape Conservation Areas and Landscape Preservation Areas in the Operative Dunedin City District Plan (2006). This provided a basis to make recommendations regarding appropriate status as well as their spatial definition included in the 2GP across the entire Dunedin District.

The focus of 2GP Landscape Assessments on refining and confirming previous landscape management areas has explicitly relied on previous landscape assessments which included a description and characterisation of landscapes in the context of the District and Otago Harbour specifically, namely the LMA Review (Boffa Miskell, 2007) and Rural Character Assessment: Dunedin City (Forest Environment Limited, 2010). Such landscape character areas provide a useful basis to inform a subsequent process of evaluation and mapping where landscape values occur.

By comparison, the JWS Landscape Assessment has commenced with a specific review of the Otago Peninsula, independent of any existing landscape characterisation. This process has

drawn on additional landscape inventory information relating to the harbour's geology and understanding of Wāhi Tupuna. As a result, the JWS Landscape Assessment appears to combine the process of characterising different parts of the Otago Peninsula into landscapes with judging such landscapes as important. Differentiating landscape character areas does not necessarily mean all parts of a defined landscape character area have important landscape values.

When describing the process of landscape evaluation, the JWS Landscape Assessment acknowledges that landscapes must be identified at an appropriate scale, noting the essential arbitrariness of their separation. Whilst the JWS landscape assessment accepts that lines must be drawn on planning maps for administrative and practical purposes and to rationally distinguish one landscape from another, this appears to conflate the process of distinguishing between different landscapes (landscape characterisation) with mapping where important landscape values occur (landscape evaluation).

Apparent differences between the processes of landscape characterisation and landscape evaluation may account for much of the discrepancy in relation to the extent of SNLs identified within the Otago Harbourside landscape character area. Whilst landscape character inevitably changes at a zone of transition rather than a hard edge, the process of landscape evaluation is necessary to determine where statutory landscape management mechanisms are required. In short, landscape overlays should reflect where coherent natural landscape values qualify as significant or outstanding.

Furthermore, whilst the author of the 2GP Landscape Assessments contributed to and supports the subsequent findings of the JWS, no wider calibration has been undertaken to confirm ratings and thresholds applied across the district, given its specific focus within the context of Otago Harbour. As a consequence, this may mean other localised parts of the district could also qualify as SNL or ONL if subjected to a similar more detailed local scale review. Any amendments to landscape evaluation should ensure a district wide threshold has been applied.

The JWS Landscape Assessment also recognises that cross-boundary landscape values should be addressed, including areas below MHWS beyond the jurisdiction of territorial authorities. In the context of Dunedin, a separate coastal study has also been completed to prevent this potential gap (Moore et al., 2015). This region-wide coastal study provides an assessment of natural features and landscape values in the coastal environment as required by the NZCPS which can be considered in parallel with the landscape assessment above MHWS.

3.3 Landscape Attributes

A foundation for any landscape evaluation requires identifying and describing relevant landscape attributes and associated factors assessed. Such lists evolve over time and do not form a recipe which is necessarily relevant in every instance. To assess landscape(s), individual factors are not considered in isolation, but in their interplay with each other.

The origins of such landscape factors are based on well-established caselaw including the 'Amended Pigeon Bay' or 'WESI'⁵ criteria. Such factors are frequently re-packaged as three overlapping dimensions or landscape attributes, namely biophysical, associative and sensory / perceptual consistent with current NZILA Best Practice Guidelines⁶. Such grouping of landscape attributes is acknowledged in the evidence of Mike Moore before the 2GP Hearings Panel⁷.

⁵ NZEnvC C180/99, Wakatipu Environment Society Inc. and others v Queenstown Lakes District Council, para.110.

⁶ NZILA Education Foundation (2010) Best Practice Note 10.1: Landscape Assessment and Sustainable Management

⁷ Michael William Moore (2017) Statement of Evidence for Dunedin City Council before the 2GP Panel, Para. 46.

Identifying and grouping relevant factors into landscape attributes or dimensions when evaluating a landscape facilitates evolution in understanding and application of such matters. Such application deliberately seeks to avoid settling upon a mere formulaic framework of factors that could simply be 'fed through' a landscape evaluation in a computerised fashion⁸. Landscape values arise from the interaction between such relevant dimensions. Through this process, the assessment of relevant attributes as applied in the 2GP Landscape Assessments is considered suitably robust in terms of collectively addressing relevant landscape dimensions.

When assessing landscape attributes, the JWS Landscape Assessment correctly identifies a discrepancy in factors between the NZCPS (2010), the Otago Regional Policy Statement and policy included within drafting of the 2GP. In seeking to resolve such differences, it outlines a suite of matters used to inform an updated landscape evaluation across established landscape dimensions. A comparison of factors identified in seeking to modify landscape classification is set out in **Appendix 1**. Such matters have also been adapted to recognise an evolved understanding of bi-cultural aspects across all dimensions of landscape and clarified use of aesthetic aspects, noting⁹:

"...the witnesses have adopted the proposed RPS factors... but with expanded factors to recognise a bi-cultural lens, such as at paragraph 1a and 2b, and substituting 'aesthetic' for 'amenity' values at 2b, recognising that "aesthetic" references all senses - sound, smell, sight, feel, movement and memory."

Such refinement of landscape attributes accords with emerging best practice, including improved recognition of bi-cultural aspects across all landscape dimensions¹⁰. To this end, continued liaison between DCC with rūnaka as kaitiakitaka is appropriate together with separate specific recognition of identified Wāhi Tūpuna. Assessment of aesthetic values (as opposed to amenity values) as applied in both the 2GP and JWS Landscape Assessments is also consistent with current understanding of this sensory landscape dimension.

Whilst continued evolution in understanding of relevant landscape factors is consistent with best practice, such clarification does not in itself justify a re-assessment of Otago Peninsula's landscapes as implied in the JWS¹¹. Notwithstanding this, having such re-assessment assists further understanding of how factors which address relevant landscape dimensions have been understood. In short, this additional understanding of potential landscape values across relevant landscape dimensions is considered to build upon, rather than replace, previous assessments within the JWS re-assessment.

3.4 Ratings and Thresholds

Case law supports the view that thresholds for outstanding natural landscapes 'will usually be so obvious that there is no further need for expert analysis aside from determining where a particular landscape or feature begins and ends'¹². This applies an ordinary understanding of the word 'outstanding' to mean 'conspicuous, eminent, especially because of excellence' and 'remarkable'. Given this direction, a rigorous approach to landscape evaluation typically involves a layered understanding of relevant landscape attributes accompanied by an explicit (to the extent possible) justification as to why values meet the threshold of any identified landscape

⁸ NZEnvC C11/2009, Unison Networks Limited vs. Hastings District Council. Para. 96.

⁹ Di Lucas and Mike Moore (31 March 2020) Landscape Architect Joint Witness Statement. Para. 1.1.

¹⁰ Tangata whenua input should not be limited to 'associative' attributes only and may inform understanding of biophysical and sensory attributes.

¹¹ Di Lucas and Mike Moore (31 March 2020) Landscape Architect Joint Witness Statement, page 5.

¹² NZEnvC C180/99, Wakatipu Environment Society Inc. and others v Queenstown Lakes District Council, p. 57

classification. Where possible rationale should be included which clarifies where such landscapes begin and end, ensuring landscapes are assessed as a whole.

The 2GP landscape assessments do not set out any explicit ratings when identifying qualitative descriptions of relevant landscape factors used to inform overall judgements. Conversely, the JWS Landscape Assessment rates relevant landscape attributes using a seven-point rating scale (Very High/ High/ Medium – High / Medium / Medium – Low / Low / Very Low) used alongside a description of values when classifying SNLs, ONFs and ONLs. The use of this seven-point scale and specifying such ratings is consistent with current best practice and assists transparency in terms of understanding the relative importance of such attributes in the context of the district.

The JWS Landscape Assessment threshold for determining ONLs acknowledges that each landscape attribute does not need to rate as “very high” for a landscape to be identified as outstanding. In the context of Dunedin, the JWS Landscape Assessment states ONLs are expected to rate “high” in at least two attributes, or “very high” in at least one. An alternative evaluative approach elevates the specific role of sensory / perceptual landscape dimensions when evaluating a natural landscape as outstanding, somewhat akin to a ‘wow’ factor that results in the landscape standing out as exceptional. Notwithstanding this, when setting such thresholds, recent caselaw identifies that it is simply artificial to try to construct a threshold for what is inherently and ultimately a judgment call¹³. An expert’s evaluative role is to assist the decision maker to make a properly informed judgement which is often obvious and straightforward.

The JWS Landscape Assessment does not define any explicit threshold when identifying SNLs. At the time the 2GP Landscape Assessments were prepared, the terminology for ‘second tier’ landscapes¹⁴ had not been defined. Notwithstanding this, the review of landscape conservation areas undertaken as part of the 2GP landscape assessments recommended identifying such overlays “to include the most important natural areas and the visually prominent areas, and to avoid areas of existing urban development”¹⁵. Policy 2.4.4.2 of the 2GP further clarifies that ONFs and ONLs are identified where natural features and landscapes have ‘exceptional values’, and SNLs are where natural landscapes have ‘values of high significance’. When informing such judgements, the application of ratings and thresholds increases robustness and transparency.

3.4.1 Naturalness

ONL classification under s 6(b) of the Act is intended to identify only those landscapes that are sufficiently ‘natural’. A premise identified in the PCT Appeal is that protection of the Otago Harbour landscapes should be expanded in large part because of the proximity to the larger centres of Dunedin population. In line with this submission, the JWS Landscape Assessment ratings explicitly discuss this urban landscape context, stating less intact naturalness is anticipated on an urban periphery than in a remote location.

Applying what amounts to a shifting threshold of naturalness has potential to diminish the actual presence of what must continue to represent natural landscape values and through which the basis for DCC’s landscape overlays apply. Whilst natural landscapes may express different values in different contexts, a district or regional council should consider whether such natural

¹³ C160/2019, para. 61.

¹⁴ Landscapes not meeting the ‘outstanding’ threshold but with elevated importance in terms of RMA matters.

¹⁵ Mike Moore (26 August 2013) Dunedin City, Assessment of current Landscape Conservation Areas for District Plan Review, page 7.

landscapes qualify as outstanding or significant in district or regional terms¹⁶. In this respect, thresholds for such evaluation should not change. The Man O' War Station Limited Court of Appeal Decision further clarifies that whether or not land qualifies as important is not to be influenced by the consequences of according it that status¹⁷.

3.4.2 Amenity Values

All landscapes have amenity values. An understanding of such values is assisted through landscape description, landscape classification and identification of where natural landscape values are considered to be more important. Where areas are not identified as having outstanding or significant natural landscape values, this does not absolve the need to maintain amenity values under RMA Section 7c.

Given this statutory context, the use of landscape character areas enables further appreciation of all of the landscapes encompassing Otago Harbour including those influenced by urban development which do not qualify as part of an SNL or ONL. Such landscape character areas can be used to further understand and manage appropriate landscape change. In highlighting this distinction between area-based landscape characterisation and landscape evaluation, it is important to emphasise that landscape does not require significant or outstanding natural landscape value when maintaining and enhancing amenity values in accordance with RMA section 7c.

3.5 Landscape Evaluation - Mapping Landscape Values

The basis for landscape evaluation in the 2GP relates to whether natural landscape values are sufficient to support SNL or ONL classification. Case law supports the view that mapping such landscape values should be at a scale that accounts for the feature or landscape as a whole alongside identifying the geographic extent of what is sought to be protected¹⁸. As set out above, assessment should also be based upon the inherent quality of the landscape itself, independent of the protection such classification enables. In short, mapping must ensure it responds to coherent landscape values.

Where mapping significant or outstanding natural landscapes, the 2GP Landscape Assessments often rely on ridgelines and contours to define where such natural landscape values begin and end. For example, SNLs identified in the context of Otago Harbour are typically drawn between a ridgeline and either the 40 metre or 100 metre contour line. A similar reliance on elevation is identified in the JWS landscape evaluation where an expanded ONL has been defined along the southern edge of Otago Harbour and similarly where differentiating between SNL and ONL to the west of Pūrākaunui Inlet. This has generally resulted in expanding landscape boundaries to encompass ridgetops. Whilst such reliance on elevation and contours may provide a coherent boundary on a topographic plan and where viewed vertically across a landform, it may not always correlate with a legible boundary on the ground.

Another approach to mapping landscape values frequently identified in the JWS Landscape Assessment is to follow zone boundaries, particularly where defining SNLs adjoining the 2GP Township and Settlement Zone which typically follow the edge of Otago Harbour. This approach has generally ensured all land within a geographic area is included within an overlay and can appear less responsive to underlying changes in natural landscape values which may otherwise occur. As discussed above, it is important that mapping included as part of a landscape

¹⁶ Man O' War Station Limited v Auckland Council Court of Appeal, CA422/2015, para. 95.

¹⁷ Man O' War Station Limited v Auckland Council Court of Appeal, CA422/2015.

¹⁸ NZEnvC 160 (2019) Hawthenden Farms Ltd and others v Queenstown Lakes District Council, para. 30.

evaluation responds to identified landscape values. Failing this, unrepresentative and more modified areas may be included within overlays which detract from and may undermine more natural landscape values when considered as a whole.

Boundaries following changes in landform generally provide a more coherent and permanent boundary along which landscape classification applies. In the absence of such legible changes in landform, land use and land cover can provide an alternative coherent edge that is more readily understood on the ground. To this end, landscape patterns irrespective of zone boundaries should usually inform mapping of landscape overlays and inform where landscape values start and end. Such mapping should always ensure the values of important landscape(s) remain coherent and legible.

3.6 Landscape Baseline and Provision for Urban Growth

A key difference identified between the 2GP and JWS Assessments reflects the extent to which the process of landscape evaluation addresses the existing environment or baseline, including the extent to which zoning may facilitate and/or anticipate future landscape change. Whilst changes anticipated through District Plan zoning were previously acknowledged in the 2GP Assessments¹⁹, the JWS Landscape Assessment has intently been drawn tightly along Township and Settlement Zone boundaries irrespective of any apparent reduction in natural landscape values which occur. Such modification includes development and land use changes within existing 2GP Rural Residential zones.

Chapter 12 of the 2GP recognises that future urban land may be required over the timeframe of the Plan in order to respond to population and business growth. When identifying the extent of landscape overlays in the context of Rural Residential zoned land, the 2GP landscape assessments previously recognised that an SNL overlay may form a useful tool to ensure natural landscape values are appropriately considered when development proposals are submitted and are appropriate in such areas²⁰. Recent caselaw supports the view that where inherent qualities of an area justify landscape classification, this should not be disqualified by reason of what a proposed district plan would allow by way of development²¹.

Along parts of the Otago Harbourside landscape character area, changes from mapping identified in the JWS Landscape Assessment commonly follows MHWS and Township and Settlement Zones irrespective of underlying modification and changes in landform and land use. This represents a shift away from a more nuanced consideration of where natural landscape values occur when identifying coherent SNL boundaries. In such areas, it is considered the 2GP generally provides a more relevant approach to understanding the extent of where such apparent changes in landscape value occur.

4.0 Landscape Evaluation Peer Review Method

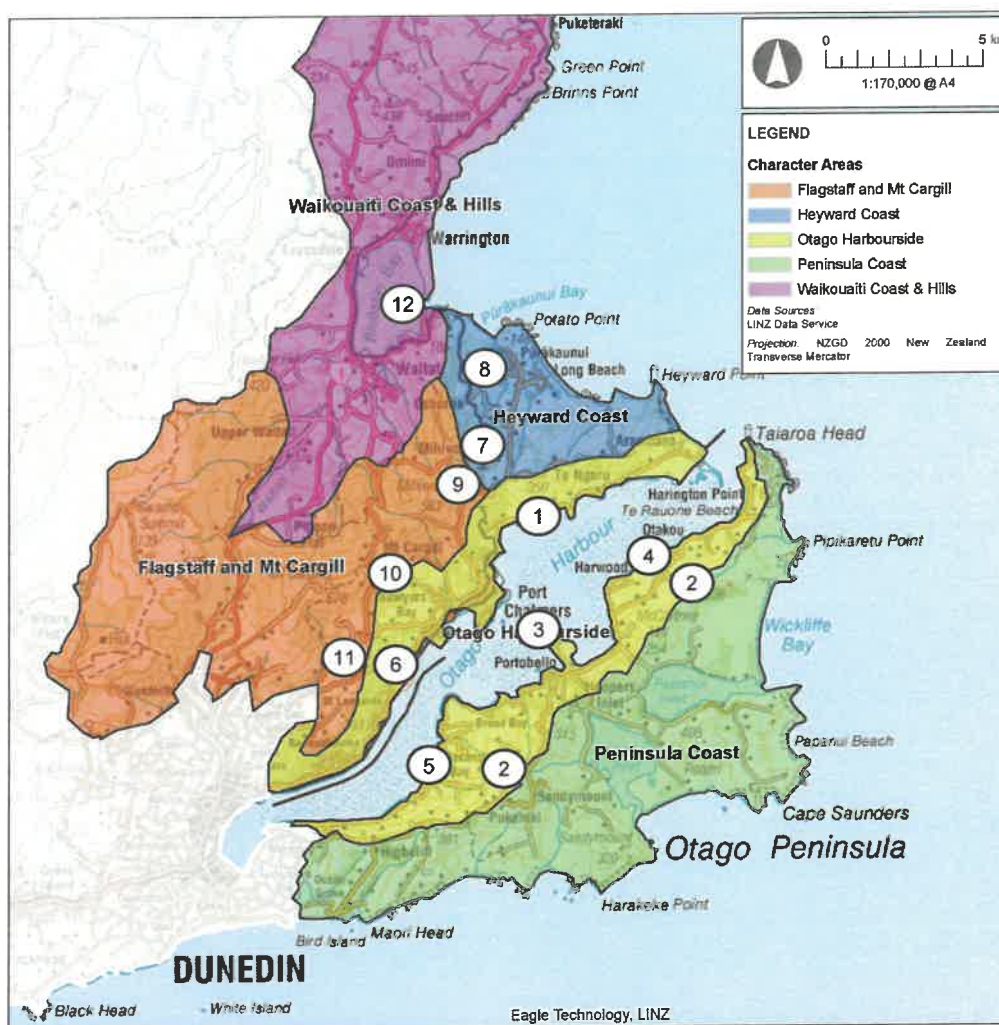
In order to assess differences in landscape evaluation between the 2GP assessments and the subsequent JWS, this assessment has analysed the differences in landscape values and associated refinement of mapping of both SNLs and ONLs. This has entailed a series of site visits within Otago Harbour and the adjoining land to the north-west and included interrogation

¹⁹ Evidence of Mike Moore (May 2017), Para 92.

²⁰ Evidence of Mike Moore (May 2017), Para. 96.

²¹ EnvC 160 (2019) Hawthenden Farms Ltd and others v Queenstown Lakes District Council, para. 76.

of mapping boundaries using GIS. Such review has been set out within each landscape character area previously identified as part of the LMA Review (2007) (see **Map 5**).



Map 5: Landscape Character Areas as identified in the LMA Review (2007) and general areas where differences between the 2GP and JWS Landscape Assessments have been assessed

During the mediation process, conferencing has been undertaken with PCTs landscape expert, Di Lucas as well as a hui with representatives from Otakou and Puketeraki rūnaka to reach agreement with the amended landscape overlay boundaries.

In reviewing differences between landscape evaluations, 12 key areas were identified where landscape overlays within the 2GP were redefined in the JWS Landscape Assessment and subsequently refined through this evaluation process. Such areas are labelled in **Map 5** and discussed in **Sections 5 to 8** of this report. Differences between mapping within the 2GP (solid) and amended (hatch) landscape overlays are shown in **Figures 2 to 6** together with an overview map on **Figure 1** included in a separate graphic supplement.

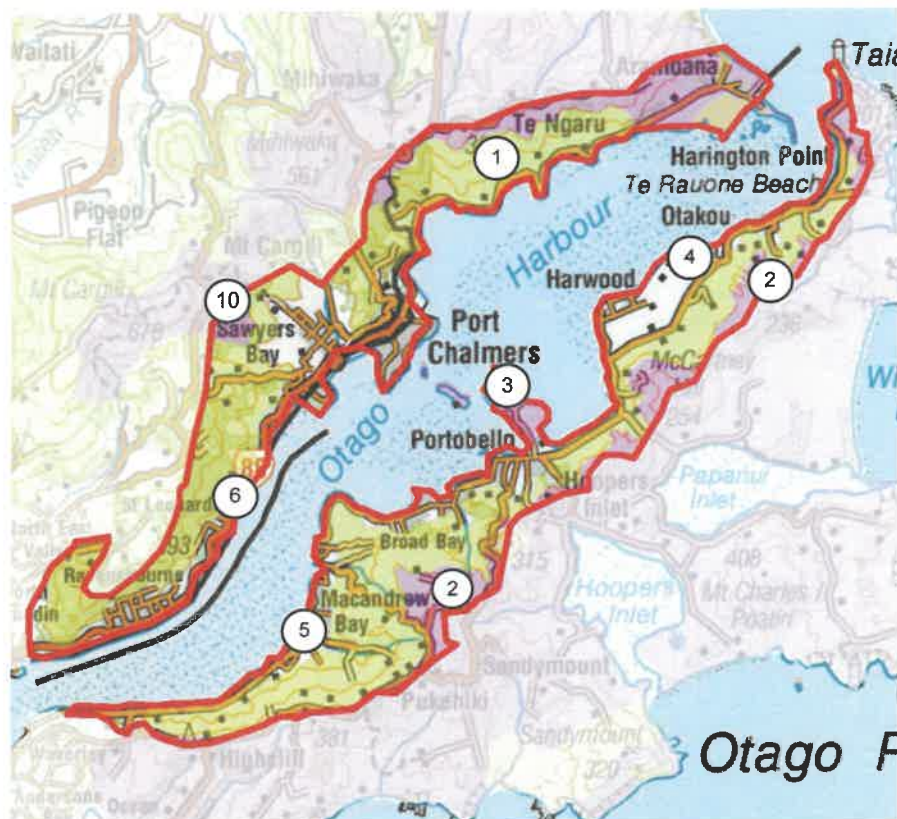
The findings of this peer review landscape evaluation are summarised on **Figure 7** and include an assessment of landscape attributes for each identified ONL and SNL in **Appendix 2**. Relevant landscape values have been developed through conferencing with Di Lucas and rūnaka in response to PCTs appeal. For completeness, ratings which support the findings of

this landscape evaluation have also been included within **Appendix 2**. It is understood such values will undergo continued liaison between DCC with rūnaka as kaitiakitaka as part of being adopted in the 2GP.

In addition, an assessment of 10 Site Specific Appeal Points in terms of their identification within landscape overlays and/or the capacity of these landscape areas to accommodate increased development is set out following a review of each relevant landscape character area below. Each appeal point is also shown on **Figures 2 to 6** and illustrated on **Viewpoints 1 – 20**.

5.0 Otago Harbourside

The Otago Harbourside landscape character area forms a long, narrow volcanic caldera extending north-east of Dunedin city. This encompasses the enclosing landforms which form Otago Harbour, recognising that Otago Harbourside would not be a harbourside without a harbour. Within the Otago Harbourside landscape character area, sub-units also recognise the harbour entrance (outer harbour) from the inner harbour. This transition is identified in the vicinity of Portobello Peninsula and consistent with the Otago Harbourside landscape character area identified within the Rural Character Assessment, Dunedin City (Miller, 2010).



Defining elements (key characteristics)

- Physically and visually contained historic city harbourscape
- Historic waterfront settlements, with associated infrastructure
- Steep spur and gully hillsides descend from prominent volcanic ridgelines

- Transitional pastoral farming on slopes
- Natural coastal-estuarine habitats

Within the Otago Harbourside landscape character area, there are three key areas of discrepancy between ONL and ONF identified within the notified 2GP and subsequently identified in the JWS Assessment. These encompass the proposed extension of ONL from the Heyward Coast along the northern side of the outer Otago Harbourside from Aramoana to Deborah Bay (Area 1), the extension of ONL along the ridgetop forming the southern side of the Otago Harbourside adjoining the Peninsula Coast (Area 2) and the identification of Portobello Peninsula as part of an Outstanding Natural Feature (Area 3). Part of a further proposed ONL at Mount Cargill (Area 10) also extends into the Otago Harbourside landscape character area above Sawyers Bay, addressed as part of the Mount Cargill ONL in section 7.2 of this report.

Differences between the 2GP and the JWS Landscape Assessment in relation to SNL primarily reflect the extent to which the lower boundary has been drawn along the harbour edge, typically following Township and Settlement Zone boundaries and Mean High Water Springs (MHWS) wherever possible in the JWS Landscape Assessment. The 2GP Landscape Assessments generally reflect a more nuanced transition between the more natural / unbuilt character above and a more settled / built character below the SNL boundary. These have been assessed at Area 4 along the southern outer edge of Otago Harbour and Areas 5 and 6 along the inner edges Otago Harbour.

5.1 Area 1: Outer Harbourside Edge (Northern side)

The northern outer side of Otago Harbour (Outer Harbourside Edge) extends between Careys Bay and Aramoana. Landscape values in this area were previously recognised as part of a larger Coastal Landscape Preservation area in the 2006 Dunedin City District Plan. Within the 2GP this was subsequently separated into SNL and ONL, with SNL primarily identified within the outer part of the Otago Harbourside landscape character area (see **Figure 2**).

Within the 2GP Landscape Assessments, the Heyward Coast SNL extends from the Otago Harbourside landscape character area into the catchment encompassing Pūrākaunui Inlet within the Heyward Coast landscape character area to the north. The mapped extent of this SNL generally follows the 40 m contour and the ridgeline of Otago Harbour, avoiding the more settled lower slopes and harbour fringe. At Pulling Point and Acheron Point, the boundary is described as coinciding with Mean High Water Springs (MHWS) in recognition of the visual prominence and high – moderately high natural character values of these headlands²², however this is not reflected in the mapping included in the 2GP.

By comparison, the JWS Assessment combines this part of the Otago Harbourside landscape character area with the Heyward Coast ONL to form a larger ONL which extends to MHWS along the edge of Otago Harbour which culminates at Heyward Point. Beyond the Otago Harbourside landscape character area, this proposed ONL culminates along the ridgetop of Mihiwaka above Deborah Bay and encompasses the sequence of volcanic ridgetops which encircle and define Pūrākaunui Inlet.

Within Otago Harbour, modification remains more apparent along the harbour's coastal edge and includes a continuous seawall and road tracing the shoreline accessing Aramoana and several residential dwellings adjoining the coastal edge. This substantially differs in character

²² Moore, M. (2013) Assessment of Landscape Conservation Areas, page 28

from the more exposed and open character encompassing the catchments of Long Beach and Pūrākaunui Inlet which continue north of Aramoana between Heyward and Potato Points.

The key differences in natural landscape values identified between the 2GP and JWS Landscape Assessments and used to justify the classification of outstanding natural landscape include reference to the ridgeline of legible volcanic landforms, additional recognition of biodiversity values in and around the settlement at Aramoana and Mihiwaka, adjoining aspects of marine habitat and reef systems, increased recognition of the sense of wildness and mana whenua associations in views from Ōtākou Marae. Such ridgetop / skyline associations and natural landscape values adjoining Aramoana are considered to justify some localised refinement of ONL boundaries from that currently included in the 2GP in these areas. However, natural landscape values are not considered sufficient to justify an expansion of the Heyward Coast ONL within this entire area of the Otago Harbourside landscape character area.

Beyond the more immediate backdrop to Aramoana at the entrance to Otago Harbour and its associated enclaves of recognised settlement opportunity, the land above the harbour edge includes a mosaic of varied rural land use including pasture with pockets of exotic trees and regenerating vegetation, reinforcing a strong settled rural character. Within Deborah Bay, a transition between SNL within the Otago Harbourside character and a more elevated ONL can be identified along the Main Trunk Railway Line above which vegetation forming the southern slopes of Mihiwaka remains evident. To the east of Mihiwaka, the boundary separating SNL from ONL follows a sequence of legible eroded volcanic ridgetops evident in the vicinity of the 300 metre contour adjoining Hare Hill and the 200-metre contour below Hodson Hill, connecting the broader headland of Heyward Point with Mihiwaka along the upper outer edge of the harbour. Below MHWS, moored boats in Deborah Bay and the proximity of Port Chalmers add to the sense of modification in this area.

Based on the above, some localised refinement of the 2GP landscape overlays are recommended to create an extended ONL boundary which encompasses the impressive cliffs at Aramoana and following the legible sequence of ridgetops between Mihiwaka and Heyward Point as illustrated in **Figure 2**. Below this, the remainder of the Outer Harbourside Edge between Careys Bay and Te Ngaru is considered to form an SNL down to MHWS but avoiding settlement zones and associated cultural values acknowledging continued development opportunities. Whilst landscape values in this area of the Otago Harbour generally remain high, they are not considered to be exceptional to the extent that justifies an ONL classification. Such attributes and ratings supporting a separate SNL classification relating to the Outer Harbourside Edge (Northern Side) are set out in **Appendix 2**.

Recommendation

Refine the 2GP Heyward Coast ONL to encompass:

- the northern entrance to Otago Harbour encompassing important biophysical and associative values surrounding Aramoana.
- the ridgetop defining the Outer Otago Harbour skyline between Heyward Point and the vegetated slopes of Mihiwaka

Maintain area between Careys Bay and Te Ngaru as an SNL between MHWS and the revised ONL.

5.2 Area 2: Peninsula Coast / Otago Harbour Ridgetop

This area encompasses the southern edge of the Otago Harbour's volcanic caldera which extends between Taiaroa Head and the urban boundary of Dunedin to the north of Waverly.

Within the 2GP, the Peninsula Coast ONL generally culminates along the ridgeline which defines Otago Harbour. Proposed changes identified in the JWS effectively extend the Otago Peninsula ONL into the Otago Harbourside landscape character area to encompass the upper slopes and volcanic ridgetops which remain legible along the upper slopes and skyline of Otago Harbour. This amended boundary broadly follows the 200-metre contour in the Inner Harbour then drops down to the 100-metre contour to skirt along the northern face of Pukemata (Harbour Cone) before continuing along the 100-metre contour beyond Portobello Peninsula towards Taiaroa Head. It also coincides with the upper slopes and peaks of Otago Peninsula identified as a Wahi Tupuna.

Within the Inner Harbour west of Portobello Peninsula, the ridgetops are generally accessed along Highcliff Road with several dwellings, tree belts and the settlement at Pukehiki associated with more residential use and frequently punctuating parts of the skyline visible in this area. In addition, several lookout opportunities overlook Otago Harbour from within this area, including views from Highcliff Road and a ridgetop lookout at The Soldiers Monument. Larnach Castle adds additional landscape value in this area. The alignment of much of Highcliff Road typically straddles the upper slopes below the ridgetop. In this area the road alignment generally coincides with a legible change in landscape values which differentiate the ridgetop encompassing the skyline from the harbour slopes below.

Within the Outer Otago Harbour, public road access ceases along the ridgetop with Highcliff Road dropping down to Portobello along the front face of Pukemata. East of Castlewood Road, open undeveloped volcanic landforms, which include Pukemata, create a legible sequence of impressive eroded volcanic landforms which define the ridgetops along the central and outer skyline of Otago Harbour.

In response to submissions during the 2GP hearings, Mike Moore identified that the southern aspect of Otago Harbour has high landscape values which do not qualify as outstanding²³. The key differences in landscape values identified to support the extension of ONL relate to the upper slopes of the Otago Harbourside landscape character area only. In this area, landscape values more explicitly reference the distinctive and legible geological history, the dramatic sequence of prominent volcanic knolls and ridges which contribute to the memorability of the Peninsula skyline and recognition of important cultural and historic values. Such values are considered to support expanding the Peninsula Coast ONL into the upper slopes of the Otago Harbourside landscape character area, particularly to encompass the sequence of distinctive and expressive volcanic ridgetop forms.

In the outer harbour, the extent of ONL along the ridgetop also coincides with part of the Ōtākou Native Reserves. Here revisions to the ONL have been limited to the open ridgetop landforms to the south of Pipikaretu Road and to encompass the prominent landform at Harrington Point. Between these areas, no change to the existing 2GP SNL boundary is recommended in response to the important cultural associations previously recognised in this area.

Given some localised refinement acknowledging important landscape values which remain evident along this ridgetop from within Otago Harbour and integral to the wider Otago Peninsula, an increased extent of ONL is generally supported in this area as set out in **Appendix 2**.

Recommendation

Extend ONL to include the ridgetops which enclose the southern side of Otago Harbour, as follows:

- Within the Inner Harbour follow Highcliff Road and parts of Camp Road and Castlewood Road skirting along north-west flank of Peggys Hill as more legible

²³ Evidence of Mike Moore (May 2017), paragraph 50.

definition of ridgetop and north of Highcliff Road where this dips beyond the ridgetop at Clifton.

Extend the Peninsula Coast ONL to encompass the ridgetops and upper slopes of volcanic hill forms which enclose the outer southern edge of Otago Harbour north of Castlewood Road and maintaining settlement opportunity surrounding Harrington Point within the Ōtākou Native Reserves.

5.3 Area 3: Harbour Islands and Portobello Peninsula

The Harbour Islands and Portobello Peninsula forms a combination of ONFs and SNL identified in the 2GP. Portobello Peninsula was identified as an SNL and a part of the wider North West Peninsula SNL while both Goat and Quarantine Island were identified as ONFs. The JWS disputed that Portobello Peninsula was an SNL recommending it being classified as an ONF.

The islands and peninsula provide a break between the inner and outer harbour and represent a geological focal point expressing formative volcanic processes. The area remains largely intact with Goat Island including substantial areas of indigenous forest alongside areas of regenerating indigenous vegetation on both Quarantine Island and Portobello Peninsula in addition to substantial areas of pasture. Transmission lines also span Otago Harbour through this area, beyond which the surrounding land cover remains highly coherent with minimal clutter.

Within the 2GP the values associated with the Portobello Peninsula are related to the coherent nature of the landform and its rural character. The JWS emphasises the complex geological history, distinctiveness of the volcanic landforms, importance to Kāi Tahu and memorable nature of this area, therefore justifying the change from SNL to ONF. The values identified to include Portobello Peninsula as an ONF by the JWS and considering the intactness and geological significance of these three landforms. Based on such recognised values as set out in **Appendix 2**, it is recommended that the combination of Harbour Islands and Portobello Peninsula are classified as a part of a coherent ONL separating the Inner and Outer Otago Harbour.

Recommendation

Include Portobello Peninsula within the Harbour Islands and Portobello Peninsula as a collective ONL within Otago Harbour.

5.4 Area 4: Outer Otago Harbourside Edge (Southern Side)

The outer Otago Harbourside edge extends between Portobello Peninsula and the established settlement at Harrington Point near Taiaroa Head. In this area, the 2GP identifies the North-West Peninsula SNL above the 40-metre contour similar to the Inner Harbour. By comparison, the Peninsula Harbourside SNL identified in the JWS has been drawn to coincide with MHWS wherever possible with the exception of areas Township and Settlement zone, which typically occupy flatter coastal plains along this area of the Otago Harbourside landscape character area.

East of Portobello, significant natural landscape values remain apparent with more limited modification generally evident along Harrington Point Road where this adjoins the harbour edge. At Gills Corner, Harrington Point Road deviates from the coastline and follows parallel with a change in landform which extends south of the settlement of Harwood and the adjoining Otakou Golf Course alongside Akapatiki Flats. The lower lying land to the west of Harrington Point Road has previously been identified within the inland extent of the coastal environment and

omitted from the 2GP SNL. Ōtākou Native Reserve land also commences from Akapatiki Flats and introduces a significant cultural landscape which interacts with natural landscape values in this area.

The key differences between SNL identified in the 2GP and JWS landscape assessments which relate to this area are summarised below:

- Numerous areas of remnant / regenerating native forest, including on roadsides;
- Naturalness is modified by adjoining settlements, harbourside roads and reclamation;
- The area has a limited scatter of structures, highly legible natural landforms, and is well-vegetated with patches of indigenous cover, and, connections to and across the harbour waters;
- In mātauraka Māori, the land-water interplay is of significance. The associated harbour waters were major mahika kai; and
- A memorable landscape based on the enclosure of settlements by the well-vegetated or pastoral, landform-dominated rural landscape, and the associations with harbour waters and overall harbour landform.

Several additional site specific landscape values identified in the JWS also occur within this outer Otago Harbour area including reference to Ōtākou Marae as “the centre of cultural and spiritual relationship with the rohe, including with lands to and across the harbour waters”²⁴. With the exception of the Township and Settlement Zone and modified areas of drained coastal dunes at Akapatiki Flat severed from the harbour by coastal edge settlement and an existing golf course at Harwood, the extension of SNL as recommended by the JWS is generally supported in this outer area of the Otago Harbour outside the Ōtākou Native Reserve. Notwithstanding this, within the Native Reserve Land, no change to the lower SNL boundary is recommended in recognition of the important cultural landscape values identified in this area. Beyond this, significant natural landscape values become increasingly apparent, particularly where open eroded volcanic landforms adjoin the harbour edge.

Based on recognition of existing landscape values, an expansion of SNL where this links with MHWS is supported in this area as set out in **Appendix 2**.

Recommendation

Amend 2GP to accord with the JWS assessment which extends the Significant Natural Landscape to MHWS along the outer harbour edge (southern side) with the exception of the existing 2GP landscape overlays within the Ōtākou Native Reserve and adjoining contained low lying area adjoining Akapatiki Flats.

5.5 Outer Otago Harbourside - Site Specific Appeals

The landscape capacity of two appeal sites have been considered within the Outer Otago Harbourside at 33 Otakou Golf Course Road along the southern side of the harbour (see **Figure 2**). These are assessed below.

5.5.1 33 Otakou Golf Course Road

33 Otakou Golf Course Road represents separate areas of land located along the southern edge of the Otago Harbourside landscape character area at Akapatiki Flat and adjoining Ohinetu Point approximately midway between Portobello Peninsula and Taiaroa Head. Both

²⁴ Di Lucas and Mike Moore (31 March 2020) Landscape Architect Joint Witness Statement, para. 2.2.4.2.

sites are not currently subject to any 2GP landscape overlays however both have subsequently been identified as part of the Peninsula / Harbourside SNL in the JWS Landscape Assessment which has been defined along the existing Township and Settlement zone and MHWS springs where possible adjoining parts of these areas.

5.5.1.1 Appeal Point 126

This site forms an irregular shaped area of 2.8 ha located between established coastal residential development identified within the 2GP Township and Settlement Zones and extending onto an elevated promontory at Ohinetu Point adjoining Harrington Point Road (see VP 1). The eastern part of this site also separates a pocket of established residential development east of Ohinetu Point from a larger area of Township and Settlement Zone at Otakou.

The landform in this area steps up to the west to include a scarp and elevated flattened terrace raised above established coastal settlement following the coastline. A small watercourse and series of modified dunes also characterise the eastern area of this site. Given this apparent change in landform adjoining and defining Ohinetu Point, the proposed extension of the Township and Residential Zone as proposed would appear unconstrained by landform and has potential to result in prominent development along the skyline observed from the existing settlement at Otakou and when approaching this site from both directions along Harrington Point Road along the harbour edge (see VP2).

In this area, natural values coincide with cultural values recognised as part of the Ōtākou Native Reserve. In this context, the site forms a legible escarpment and immediate backdrop to the harbourside settlement which is understood to hold important cultural and historical associations with setting aside land within the Ōtākou Native Reserve. Accordingly, rezoning this entire area of land as identified is considered to have potential conflict with the underlying landscape values which remain apparent.

Recommendation

Reject this appeal and maintain this site within the rural zone as currently identified in the 2GP.

5.5.1.2 Appeal Point 364

This site covers a total area of 60.3 hectares located between Harrington Point Road and Otakou Golf Course. The landform in this area reflects a series of legible dunes and hollows which includes areas of ponding and associated wetland vegetation consistent with identification in the coastal environment. Pockets of gorse and pine are established in some areas alongside fencing and drainage associated with rural land use and the adjoining golf course.

In landscape character terms, this localised area differs from the broader more elevated and visible natural landscape recognised as a coherent sequence of volcanic landforms defining the southern edge of Otago Harbour. In this context, this contained area is not considered to contain sufficient significant natural landscape values to be included as a coherent part of a wider SNL that is apparent to the south of Harrington Point Road.

Views of this site are primarily limited to adjoining areas of Harrington Point Road (see VP 3). Where visible, the sequence of modified foreground dunes remains largely open and rural with minimal adjoining residential use apparent. Such transient views are typically viewed against further dunes and mature pine trees accommodating adjoining development along the harbour edge and in the foreground of long-distance views of the landform enclosing the northern side of the harbour. Longer distance views from the northern edge of Otago harbour are typically screened by the existing harbour edge settlement adjoining Otakou Golf Course (see VP4).

Whilst existing natural landscape values are not considered to form a coherent part of the broader Peninsula/ Harbourside SNL in this location, this site maintains an undeveloped open rural character and part of a legible coastal environment separated from residential areas. Within this coastal environment there is potential for significant adverse natural character effects to occur given blanket 'upzoning' as proposed.

Recommendation

Reject this appeal and maintain site as rural given potential natural character impacts within the coastal environment consistent with that identified in the 2GP.

5.6 Area 5: Inner Peninsula Bays

This area encompasses components along the coastal edge between the urban area of Dunedin and Portobello Peninsula within the inner part of the Otago Harbourside landscape character area (see **Figure 3**). Within the Inner Harbour (South Side) the 2GP Landscape Assessments recognise that the rural character of the mid and upper slopes are important undeveloped slopes which characterise the North West Peninsula SNL. This boundary has been drawn to reflect an apparent change in character from the more modified and settled harbour edge to the more open and less developed slopes above. Accordingly, it generally adopts the 40-metre contour line as the lower boundary, except where urban development extends higher.

By comparison, the Peninsula / Harbourside SNL as identified by the JWS has been drawn to 'infill' gaps below the 40-metre contour to MHWS wherever possible to identify a Peninsula / Harbourside SNL. Such areas include Portobello Road and associated modification including established rural lifestyle areas framed within roadside native and exotic vegetation. Within the inner harbour, such areas remain more apparently settled along the harbour edge and distinct from open less developed rural areas above. The open undeveloped landform of Grassy Point retains an important land-water link recognised as an SNL in both the 2GP and JWS landscape, consistent with the Operative District Plan (2006).

The key landscape values identified within the JWS Landscape Assessment to justify an expansion of landscape overlays take account of the harbour landscape as a whole and include reference to a few areas of significant biodiversity value including forest remnants / regenerating forest at Collinswood Bush and Grassy Point, the importance of the land-water interplay (particularly in mātauraka Māori), areas of remnant or regenerating vegetation on roadsides and transient values including tidal changes and smells. Notwithstanding this, values recorded also explicitly recognise that naturalness is modified by adjoining settlements, harbourside roads and reclamation with considerable modification along much of the harbour shoreline. Associative values refer to scenic and recreation opportunities as well as shared recognition by Kāi Tahu however most of site-specific values are identified in the Outer Otago Harbour and more closely associated with the Ōtākou Marae.

Based on the level of modification which remains apparent along this inner edge of the harbour, extending the SNL boundary along the MHWS wherever possible outside the Township and Settlement Zone is not generally supported with the exception of Grassy Point. Within the inner harbour there is considered to be a clear distinction between the more obviously settled and modified character following the lower slopes and skirting the harbour edge from more apparent natural landscape values which occupies the more visible rural landscape above and east of the Cove.

Notwithstanding this, some localised refinement of the 2GP landscape assessment boundary is considered appropriate to maintain a coherent and legible lower SNL boundary, particularly where this adjoins the Township and Settlement Zone and a vegetated valley at Edwards Bay,

whilst recognises a high level of modification which remains apparent along the harbour edge. This continues to acknowledge the more limited contribution to broader natural landscape values in lower lying valleys adjoining Company Bay and Turnbolls Bay and where development remains embedded within exotic vegetation east of the Cove.

Outside the Township and Settlement Zone, the 40-metre contour often represents a coherent SNL boundary, reflecting the upper extent of frequent rural residential development below which significant natural landscape values no longer remain particularly apparent. The upper boundary of the SNL coincides with the Peninsula Coast ONL as described as Area 2 above. This coincides with a legible change in landscape value along the ridgetop defined along the vicinity of Highcliff Road and including the settlement at Pukehiki subject to controls which manage the potential for more significant adverse effects in this ridgetop area.

Recommendation

Maintain general 2GP Landscape Assessments findings which omit the inner harbourside edge from the Significant Natural Landscape above with some localised refinement which continues to omit the more modified and contained lower slopes and adjoin the Township and Settlement zone.

5.7 Area 6: Inner Otago Harbourside Edge (Northern Side)

This area forms a composite of landscape components along the northern side of the Inner Otago Harbourside. The differences between SNL in this area occur between a larger Flagstaff and Mount Cargill SNL as identified in the 2GP and a more localised West Harbour SNL identified in the JWS Landscape Assessment identified between the remaining Flagstaff / Mount Cargill SNL and an additional Mount Cargill ONL identified above. The lower edge of the revised SNL which was identified in the JWS Landscape Assessment was drawn more tightly along the Township and Settlement Zone and MHWS along the harbour edge.

Compared with the Outer Otago Harbour, this area expresses a much more modified suburban character along the harbour edge below a mosaic of vegetation and rural land use established along the southern flank of Mount Cargill recognised as the Flagstaff Mount Cargill SNL in the 2GP. Road and rail links frame the water's edge, including causeways severing localised embayments, and accentuate a ribbon of harbourside development connecting Dunedin with Port Chalmers.

Within the 2GP landscape assessments the Flagstaff - Mount Cargill SNL identified in this area commences from within the Otago Harbourside landscape character area and continues up and over the summit of Mount Cargill and adjoining ridgetops. The lower boundary has been drawn to reflect the general change in character from the more settled / built lower slopes tracing the harbour edge from the more extensive natural / unbuilt upper slopes above. In most areas, the 2GP landscape assessments adopt a 100 metre contour as the lower boundary, with the exception of the following areas:

- West of Ravensbourne - 40 m contour to capture the vegetated slopes to lower levels
- Adjacent to Ravensbourne - to avoid areas of predominantly residential character
- The railway line north of Careys Bay

The extension of the West Harbour SNL as identified by the JWS Landscape Assessment effectively expands the proposed SNL to infill gaps between development at Ravensbourne and Saint Leonards, at Blanket Bay and encompassing Kilgours Point. Whilst development is frequently less established in such areas, a change in natural landscape values remains evident between the more open and less modified landforms above and a more settled and modified harbour edge characteristic of this area of the Inner Harbour below. In this area, landscape

values include an established fringe of modification in the form of seawalls, roads, railway lines, a higher density of residential dwellings and increased land use variation consistent with areas within underlying Rural Residential and Residential Transition Zones. Such land use accentuates a more modified and domestic fringe along this Inner Otago Harbour landscape distinct from the more open and natural landscape values which remain evident above.

The approach identified in the 2GP adopts a contour line below which modification is generally more apparent. Whilst parts of the inner harbour may lend themselves to a more nuanced response acknowledging more significant natural values, such lower lying areas typically represent fragments of less modified land in the context of greater levels of development established along the lower slopes. In this context, uniformly following the Township and Settlement zone as identified in the JWS frequently appears less coherent and bisects areas which remain less natural in character. In practical terms, the use of a contour in this context can retain a more coherent response to elevation which remains legible defining the boundary along which a more modified harbour edge is delineated from the more natural and open backdrop above. Notwithstanding this, some areas maintain more significant natural landscape values below the 100 metre in the vicinity of Blanket Bay.

Refinement of SNL within Sawyers Bay as identified in the JWS Landscape Assessment is more responsive to the apparent rural lifestyle fringe evident within lower lying areas of this valley. Whilst this aspect of the JWS Landscape Assessment boundary extends beyond the Township Settlement Zone, such refinement continues to include lower lying and more modified areas with more limited contribution to the wider SNL above. Such areas remain well contained between Roseneath and Portobello and have limited contribution to coherent natural landscape values recognised in elevated areas of the wider Otago Harbourside landscape character area.

Recommendation

Maintain 2GP Landscape Assessments findings which generally identifies the Significant Natural Landscape along the 100-metre contour above a fringe of more modified harbour edge. Refine boundary near Blanket Bay to respond to legible change in land use separating the more modified coastal edge from the significant natural landscape above.

5.8 Inner Otago Harbourside - Site Specific Appeals

Four appeal sites located within the Inner Otago Harbour, all of which are located along the southern edge of the harbour (see **Figure 3**).

5.8.1 25A Irvine Road (Appeal Point 9)

25A Irvine Road is located on the lower slopes of the southern edge of the inner Otago Harbour and immediately east of The Cove. The appeal seeks to rezone this land residential instead of residential transition zone²⁵. This site is not subject to the 2GP SNL overlay but has subsequently been included in the JWS as an SNL.

The landform in this location represents part of a vegetated spur between approximately 20 and 60 masl and within the immediate context of residential development set within an established framework of vegetation within The Cove. This site itself contains 1.2 ha. accommodating two existing dwellings along the lower slopes and bordered on three sides by existing development located within the 2GP Township and Settlement Zone and Large Lot Residential Zone 1 Zone.

²⁵ Appeal of Jean Grace

Land to the east includes further areas of established vegetation and pockets of rural lifestyle development consistent with the underlying 2GP Rural Residential 2 Zone²⁶.

Views of the site are more typically obtained from adjoining residential dwellings and not typically available from Portobello Road below or Highcliff Road above. Views are also available over longer distances from the northern side of the Inner Harbour (see **VP 5**). In such views the site is generally observed as part of the adjoining mosaic of an established vegetated residential area and clearly distinct from broader areas maintaining more substantial natural values consistent with an SNL.

Given the contained vegetated and developed landscape context within which this site forms a part, it is not considered to express high natural landscape values consistent with a broader SNL. Accordingly, rezoning this site within a residential zone is supported provided appropriate provisions to manage the contribution of existing vegetation which frames and encloses development in the Cove.

Recommendation

Support inclusion of this land within a residential zone with controls on vegetation removal and landform modification.

5.8.2 457 Highcliff Road (Appeal Point 109)

The site at 457 Highcliff Road contains approximately 2.1 ha. and accommodates an existing dwelling accessed from Highcliff Road. In this location the site contributes to the established vegetated transition between adjoining residential development and nearby rural areas. In this context, this appeal seeks to rezone this land to Large Lot Residential 1²⁷.

This site is not currently subject to the 2GP SNL overlay which skirts along part of its eastern boundary and continues south of Highcliff Road. However, this site has subsequently been included in the SNL overlay as identified in the JWS Landscape Assessment drawn to tightly follow the Township and Settlement Zone at The Cove.

The landform in this area represents part of the mid and upper slopes located above approximately 100 masl and below the ridgeline which reaches approximately 200 masl in the vicinity of the site to the south of Highcliff Road. The existing land use includes an established dwelling embedded within mature gum trees which combines with adjoining vegetation to contain the enclave of established residential development within The Cove from more open areas of rural landscape to the east along Highcliff Road (see **VP 5** and **VP 6**). Such development remains contained within surrounding vegetation and separated from open undeveloped slopes which stretch to the east.

Given the rural edge character established in this area, this site is considered to have some ability to absorb a further careful residential edge development potentially up to a density consistent with Large Lot Residential 2 zoning (1 site per 3,500m²) with careful siting and controls on vegetation and building design. Such sympathetic development would remain consistent with a transition containing development within vegetation enclosing and separating The Cove from the broader SNL along the southern inner part of Otago Harbour.

Recommendation

²⁶ Within the Rural Residential 2 Zone, one dwelling is permitted per site of 1ha or over, and all subdivision is non-complying. This is a new zone created in the 2GP to allow for limited development of existing small (generally >15ha) sites that were formerly zoned Rural.

²⁷ Appeal of Phil Cunningham

Reject this appeal, but potentially support opportunity to identify a lower density vegetated edge along a transition into the adjoining SNL.

5.8.3 603 High Cliff Road (Appeal Point 67)

603 High Cliff Road contains a total area of approximately 11 hectares located along the southern Inner Otago Harbourside between Macandrew Bay and The Cove. It is classified as an SNL and zoned Rural Residential 2 in the 2GP and predominantly SNL with a small area of ONL in the JWS Landscape Assessment. The appeal seeks to rezone this land Rural Residential 1²⁸.

The site's landform extends between approximately 60 and 200 masl and appears as part of the area of mid to upper slopes between Portobello Road and Highcliff Road. In this context the landscape expresses natural landscape values with limited built development. Notwithstanding this, the existing landcover deviates from surrounding areas of pasture and includes a more isolated block of regenerating scrub and pine trees which contribute part of the mosaic of varied rural land use.

Visually this site forms part of a broader prominent mid slope which contains the Inner Harbourside landscape character area. This appears separated from residential and rural residential development which typically expresses increased modification along the harbour edge and below rural dwellings which typically adjoin Highcliff Road. Whilst the site has more limited visibility from both High Cliff Road above in the context of roadside development (see VP 7) and the Portobello Road below, such views contribute part of the open natural landform values recognised as an SNL below Highcliff Road. The Site is highly visible from within the inner Otago Harbour, particularly from Ravensbourne to Port Chalmers (see VP 5 and VP 8).

In this context, any further subdivision is less likely to be assimilated within the surrounding natural landscape values and would result in a potential pattern of increased modification along part of the spur connecting with Grassy Point which may otherwise detract from natural landscape values consistent with a wider SNL. Such increased development would also have potential to appear disconnected from the more modified harbour edge character apparent along the lower slopes.

Recommendation

Reject this appeal and maintain this site as Rural Residential 2 within an SNL limiting potential for prominent development.

5.8.4 48 Raynbird Street (Appeal Point 180)

48 Raynbird Street is located on the lower to mid slopes above existing residential development along Company Bay. It is identified within SNLs in both the 2GP and JWS Landscape Assessments and recommended to be rezoned rural in the JWS.

The site is currently zoned Rural Residential 2 within the 2GP with this appeal seeking to rezone the lower part as Large Lot Residential 2 zone (3.3 hectares) with the most elevated land zoned Rural Residential 2 zone (1.4 hectares)²⁹. The site has previously been assessed in terms of its suitability to support subdivision and development of two sites which was supported

²⁸ Under the 2GP, the Rural Residential 1 allows for subdivision to a minimum of 2 ha. per site, and one dwelling per 2 ha. site.

²⁹ Appeal of the Jensen Trust

subject to conditions on location and design³⁰. However, this has subsequently been contradicted by the JWS Landscape Assessment, which identified that the Rural Residential 2 zone enabling part of any such development would be inappropriate³¹.

The site is located between 60 and 100 masl on the western side of a broad, gently sloping spur extending from Peggy's Hill along the ridgetop of the Peninsula Coast to Grassy Point along the northern edge of Otago Harbour. The site forms part of a localised mosaic of smaller landholdings largely managed as pasture with some shelterbelts / small areas of plantation forestry. In this context, the site forms part of the transition between lower density settlement established in Company Bay below and smaller rural lifestyle landholdings above, characterising a transition into the more open and expansive rural land use which extends along the mid and upper slopes (see **VP 9**).

The site is visible from parts of Castlewood Road and Highcliff Road over greater distances to the south however is typically contained by established shelterbelt planting from these areas, much of which remains outside the control of the appellant (see **VP 10**). Views from Portobello Road along the harbour edge are also typically contained by adjoining harbourside development and associated vegetation. The site is more visible over long-distance open views across Otago Harbour from the vicinity of Ravensbourne to Saint Leonards (see **VP 11**). Here the site appears along an elongated spur ridgetop and partially enclosed within a framework of established shelterbelts. To the north of Saint Leonards, the site becomes more enclosed by surrounding vegetation and the intervening landform of Grassy Point.

Given the enclosed nature of vegetation and smaller rural holdings which characterise and contain this area of landscape, it is considered to have capacity to accommodate carefully located and designed development to assimilate within the wider natural landscape values and not appear inappropriately prominent in this rural edge context. Given this outcome, the current Rural Residential 2 Zone is supported with appropriate design controls in association with maintaining the underlying SNL classification.

Recommendation

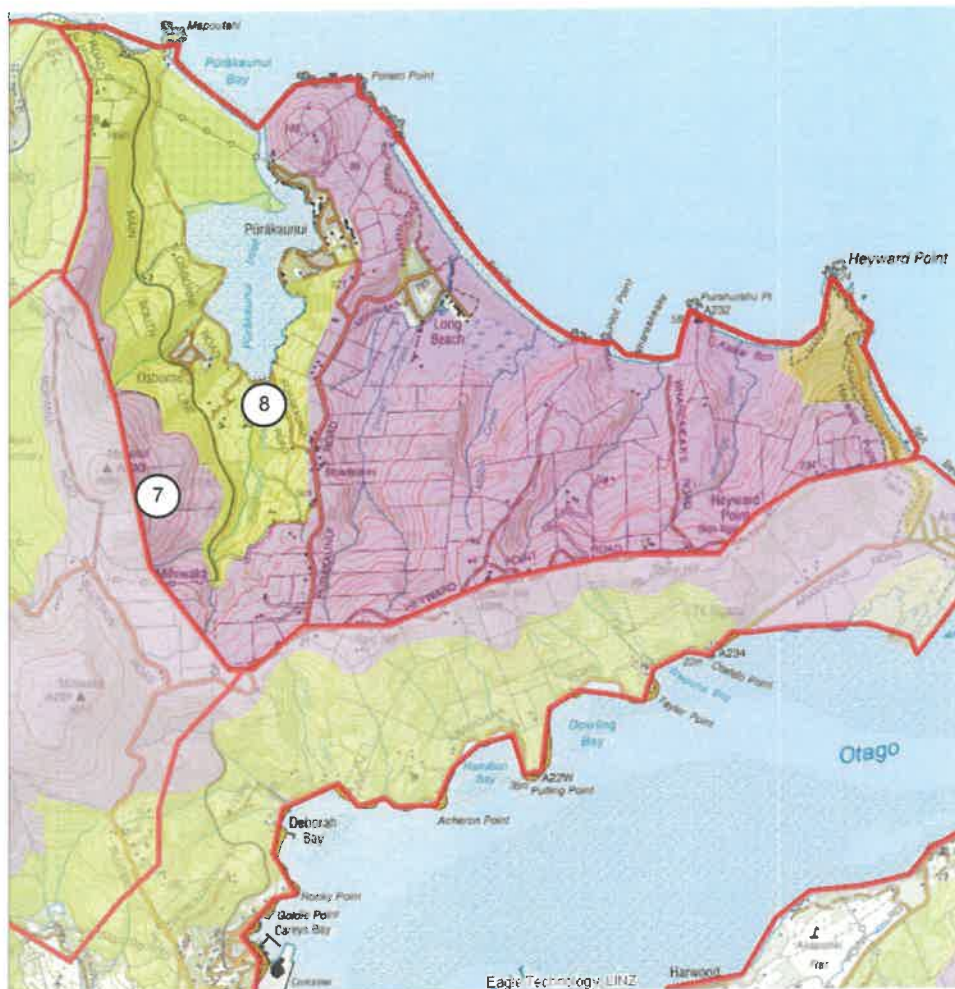
Reject this appeal and maintain this site within an SNL and Rural Residential 2 Zone.

6.0 Heyward Coast

The Heyward coast landscape character area forms a sequence of headland points and beaches, incorporating stretches of rocky cliffs and estuarine inlets between Aramoana and Doctors Point along the open coast. Unlike the Otago Harbourside there is limited public access along this more remote area of coastline, particularly to the east of Long Beach.

³⁰ Moore, M. (2019) Landscape Assessment – 48 Raynbird Street, Company Bay.

³¹ Di Lucas and Mike Moore (31 March 2020) Landscape Architect Joint Witness Statement, para 3.2.3.



Defining elements (key characteristics)

- Traditional farming on ridges and upper slopes elevated above the original coastal settlements
- Steep ridgeline topography with pronounced spurs and gullies
- Dramatic coastal landform sequence of headland cliffs and beaches
- Remote secluded coastal environment, with exposed character

The differences in landscape evaluation between the 2GP and JWS which relate to this area include the expansion of ONL into the northern side of the Outer Otago Harbour (described in Section 5), the proposed expansion of ONL to encompass the summits of Mihiwaka and Mopanui (Area 7) and the extent of SNL surrounding Pūrākaunui Inlet (Area 8) described below and illustrated in **Figure 4**.

6.1 Area 7: Mihiwaka to Heyward Coast

This area straddles parts of the Heyward Coast and Flagstaff and Mount Cargill landscape character areas. The existing Heyward Coast ONL as identified in the 2GP culminates to the

east of the Pūrākaunui catchment in the vicinity of Pūrākaunui Road within the Heyward Coast landscape character area. The proposed extension of ONL as identified in the JWS Landscape Assessment identifies an expansion of the Heyward Coast ONL to encompass the upper reaches of the Pūrākaunui Catchment and ridgetops of Mihiwaka and Mopanui forming the enclosing volcanic skyline visible from parts of the outer Otago Harbour and Blueskin Bay.

The values associated with the Heyward Coast ONL include increased reference to the sequence of legible volcanic activity, the presence of indigenous vegetation and the important relationship with the harbour entrance, harbour waters and Peninsula lands opposite, including to Ōtākou. Such values are considered sufficient to justify the expansion of this ONL into the broader ridgetops which define and enclose Pūrākaunui Inlet as an integral part of the Heyward Coast ONL.

Based on recognition of these highly apparent natural landscape values as summarised in **Appendix 2**, the expansion of the Heyward Coast ONL is supported as illustrated in **Figure 4**.

Recommendation

Extend the ONL to encompass the ridgetops of Mihiwaka and Mopanui and embrace the ridgetops which define and enclose Pūrākaunui Inlet.

6.2 Area 8: Pūrākaunui and Ōrokonui

This area is predominantly located within the Heyward Coast landscape character area and includes an area of land at Doctors Point in the south-east corner of the Waikouaiti Coast and Hills landscape character area. The reduction in SNL identified in this area results from the proposed expansion of the Heyward Coast ONL to cover the upper slopes of the Pūrākaunui Inlet between Pūrākaunui Road and the ridgetops of Mihiwaka and Mopanui. In the JWS the remaining SNL is confined to the lower and mid slopes of Mopanui below the 200-metre contour to the west of Pūrākaunui Inlet.

Differences between the 2GP and JWS landscape assessments occur to the south and east of Pūrākaunui Inlet where SNL has been replaced with a broader Heyward Coast ONL between Potato Point and Deborah Bay. This extends to MHWS along Pūrākaunui Inlet and encompasses the margins of Pūrākaunui Creek but omits the Township and Settlement Zone at Pūrākaunui. By comparison, the existing Heyward Coast ONL, as identified in the 2GP, culminates in the vicinity of Pūrākaunui Road to the east of the settlement at Pūrākaunui and excludes a small node of development and associated open space at Pūrākaunui School.

The values which support a proposed extension of ONL in the JWS Landscape Assessment in the context of Pūrākaunui Inlet are similar to those which relate to the Pūrākaunui SNL. Given the eastern edge of Pūrākaunui Inlet includes the settlement at Pūrākaunui and similar levels of modification framing the western edge of the inlet, the expansion of ONL as identified by the JWS Landscape Assessment is not supported in this area. The lower slopes which define and enclose Pūrākaunui Inlet are generally more uniformly modified and consistent with an SNL below the more expressive ridgetop landforms which support an ONL classification above. This also supports the inclusion of Pūrākaunui School as part of this more modified SNL given mechanisms which continue to require landscape to be assimilated into the landscape in this area should this designation change.

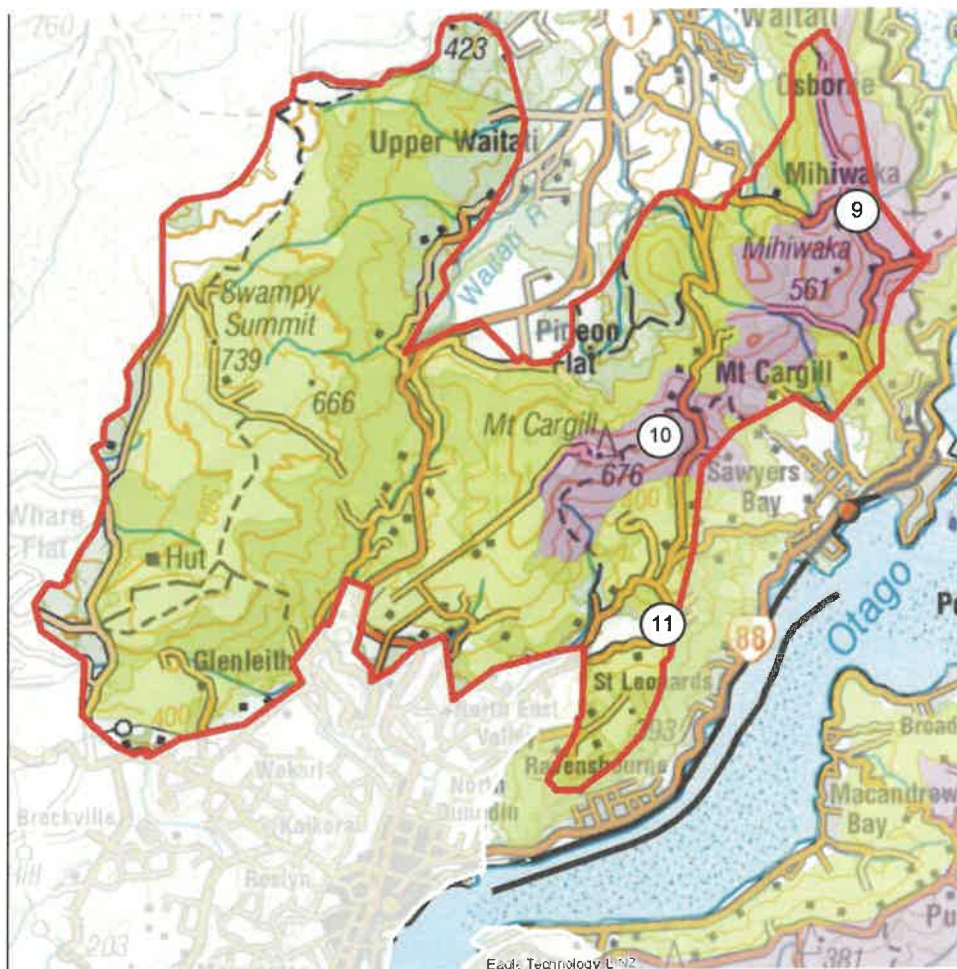
The boundaries and attributes separating the Heyward Coast ONL from the Pūrākaunui SNL are set out in **Figure 4**, with values supported the Pūrākaunui SNL set out in **Appendix 2**.

Recommendation

Extend the SNL to encompass the undeveloped coastal edge and backdrop at Doctors Point. Maintain the eastern and southern areas of Pūrākaunui Inlet as an SNL beneath ridgetop ONLs and with the exclusion of Pūrākaunui settlement and school up to Mihiwaka Station Road to remain generally consistent with the 2GP.

7.0 Flagstaff and Mount Cargill

The Flagstaff – Mount Cargill landscape character area is comprised of a complex series of elevated mainly volcanic landforms to the immediate north of Dunedin city. The summits of Mt Flagstaff / Te Whanaupaki, Mount Cargill / Kapukataumahaka and Swampy Summit are the most prominent landforms with peaks which reach between 650 and 750 masl.



Defining elements (key characteristics)

- Extensive Forest cover, including plantation forest within the foothills
- Pronounced ridgeline profiles and elevated peaks forming iconic landmarks and backdrops to the city

- Mixed land-use of traditional agriculture, plantation forestry and lifestyle settlement within the lower slopes
- Significant vegetation sequences from slopes of native forest to sub-alpine grasslands at the peaks.
- Networks of walking tracks incorporating scenic recreation and nature reserves

7.1 Area 9: Mihiwaka

The area includes the summits of Mihiwaka and Mopounui and their ridges. This area forms the western part of the wider Heyward Coast ONL which extends into the Heyward Coast and Otago Harbour Harbourside character areas. Within the 2GP Landscape Assessments the entire area is classified as SNL, including the summits of Mihiwaka and Mopounui. By comparison the JWS extends the ONL identified in the 2GP to encompass the summits of Mihiwaka and Mopounui and the land adjacent to Blueskin and Mopounui Road. This adjoins the Mount Cargill ONL to the west within the Flagstaff and Mount Cargill landscape character area.

Specific values associated with this area include the intact and legible volcanic mountains of Mihiwaka and Mopounui and areas of regenerating forest which are found on their slopes. The mountains have high cultural and spiritual values to Te Rūnanga o Ngāi Tahu and with mist and cloud frequenting the hilltops regularly.

The values identified by the JWS provide justification to expand the Heyward Coast ONL along the ridgetops which occur within the Flagstaff-Mount Cargill character area. Given the high geomorphological, ecological and cultural values the extension of the Heyward Coast ONL is supported. Nevertheless, the boundary of this ONL has been refined to include the legible boundary found to the west of Mihiwaka and on the edge of the Orokonui Ecosanctuary. This will also require refinement of the Mt Cargill ONL and the Flagstaff-Mt Cargill SNL.

Recommendation

Refine the Heyward Coast ONL to include the entirety of Mihiwaka and Mopounui following the edge of the Orokonui Ecosanctuary and valley between Mihiwaka and Mount Kettle.

7.2 Area 10: Mount Cargill

This area includes the summit of Mount Cargill and the adjoining sequence of volcanic ridgetop forms which adjoin Mihiwaka to the north-east.

Within the 2GP Landscape Assessments, this landscape is classified as an SNL which extends from the northern side of the inner Otago Harbour and encompasses the majority of the Flagstaff and Mount Cargill landscape character area. No previous landscape assessment has identified this area as an ONL, either at the regional³² or district scale with the exception of the Mt Homes Organ Pipes limited to a discrete ONF comprising 0.6 ha in the 2GP. By comparison, the JWS Landscape Assessment identifies a separate Mount Cargill ONL which adjoins the Heyward Coast ONL along the upper slopes and ridgetops beyond the northern edge of the Otago Harbour and forms the eastern edge of the Flagstaff / Mount Cargill SNL.

The key difference in classifying Mount Cargill as a separate ONL relate to the importance of the larger legible sequence of volcanic processes, increased importance of sensory and

³² Boffa Miskell (1998) Otago's Natural Character, Landscape and Significant Natural Areas.

transient values including reference to a 'cloud forest' as well as some more explicit reference to wild and scenic values, and connections to associative values including Wāhi Tupuna. The area also expresses some more apparent modification between Mihiwaka and Mount Cargill including quarrying on Mount Cutten and Mount Zion and the settlement of Mount Cargill.

Whilst the combination of Mount Cargill, Buttars Peak and Mount Holmes along with its associated vegetation are considered to express exceptional natural landscape values, the extent of such values are considered to remain confirmed to the ridgetops and distinct from the more modified working rural landscape. A legible change in native vegetation typically differentiates this prominent ridgetop and skyline from significant natural landscape values which remain coherent as the Mount Cargill – Flagstaff SNL as previously identified in the 2GP.

The extent and attributes of the ONL recommended in this area are set out in **Figure 5** and summarised in **Appendix 2**.

Recommendation

Refine the JWS Mount Cargill ONL to include a coherent ridgetop landscapes encompassing Mount Kettle, Mount Martin, Mount Cutten and Mount Cargill contiguous with the Heyward Coast ONL to the north-east.

7.3 Area 11: Part of Flagstaff / Mount Cargill SNL

This area generally aligns with or is outside the scope of PCT's appeal with the exception of part of North East Valley. At the upper end of the North-East Valley within the base of Bethunes Gully the JWS landscape assessment has been modified to extend more of the valley floor and follow a more legible edge along part of North Road to the south. Such changes to the SNL in this area remove more modified areas of visually contained land supporting plantation pine and associated rural land use below more significant natural landscape values. No specific discussion of change is identified in this area supporting the existing SNL classification, however the wider set out attributes confirming the Flagstaff /Mount Cargill SNL consistent with Area 5 are set out in **Appendix 2**.

Recommendation

Support minor amendment to SNL boundary along part of Flagstaff / Mount Cargill SNL

7.4 Flagstaff and Mount Cargill - Site Specific Appeals

Four appeal sites are located within North East Valley to the south-west of Mount Cargill and straddling the Flagstaff and Mount Cargill landscape character area along Dunedin's urban edge. Three sites (231, 233 and 235 Signal Hill Road) extend onto the mid to upper slopes to the south-east of North East Valley and a further site is located lower down to the north of North East Valley at 43 Watts Road (see **Figure 5**).

7.4.1 231, 233 and 235 Signal Hill Road (Appeal Points 21 & 378)

These sites are all currently zoned rural and predominantly subject to the 2GP SNL overlay, which has broadly been mapped above the 160-metre contour along the southern edge of this area of North East Valley. No change to this SNL overlay has been identified by the JWS Landscape Assessment in this area.

Collectively these sites are located between approximately 120 masl and 400 masl. All three sites remain below the northern summit of Signal Hill, however, typically represent the middle

and upper slopes along the northern side of an elongated spur which extends from Martins Hill to the south of Mount Cargill and which separates North East Valley from Otago Harbour. As the land increases in elevation, it typically expresses a more gradual rolling landform approaching the skyline, distinct from steeper and more folded gully areas which adjoin the valley floor below. The existing landcover in this area includes regenerating manuka with extensive areas of gorse and wilding pines.

Views of this area are concealed from within Otago Harbour and largely contained to areas within North East Valley. Such views encompass adjacent areas of Signal Road (see **VP 12**) and broader areas below the site from established residential areas within the North East Valley (see **VPs 13** and **14**). Where visible from the valley floor, the site generally appears as an undulating and rounded landform up to the skyline and above existing residential development. Parts of these sites are also visible along the skyline to the north-east when ascending the lower slopes of Mount Cargill (see **VP 15**).

These sites have been assessed separately below:

7.4.1.1 231 Signal Hill Road

This site covers an area of 4,028 m² for which the appeal seeks Large Lot Residential 2 zoning. This site is located between approximately 220 and 240 masl below Signal Hill Road and represents part of the broader vegetated hillside to the north-west of Signal Hill separating North East Valley from Otago Harbour. The site is separated from an existing linear pattern of residential development ascending parallel with and below Signal Hill Road to the west by approximately 150 metres.

In landform terms, the site occupies the head of a localised gully which remains contained from the Otago Harbour and with more limited visibility from within the North East Valley. Potential views are further limited by established landcover which includes established pine trees which extend beyond the site. The site also forms the upper edge of a larger pattern of smaller land parcels which ascend the valley walls but remain within the rural zone.

Whilst a carefully located dwelling may be assimilated in this inherent rural context, residential rezoning would likely appear fragmented and contrary to the existing more contained pattern of residential zoning below the site along the base of the North East Valley and linear pattern of residential development which culminates lower down the slope and west of the site along Signal Hill Road. In this context such spot residential zoning is not supported in the context of maintaining the broader apparent significant natural landscape values.

Recommendation

Reject appeal and maintain the existing SNL overlay and broader rural zone.

7.4.2 233 Signal Hill Road

This site covers an area of approximately 8.5 ha. located between approximately 114 masl at the base of a localised gully and 230 masl in its south-east corner. Much of the vegetated lower slopes of the gully are located below the 160 masl contour and have not been identified as part of the Flagstaff-Mount Cargill SNL.

In this area, the landform is characterised by a localised vegetated gully and a less vegetated local spur containing an existing dwelling located near the southern boundary and accessed from Signal Hill Road above. Views of this site are contained by regenerating vegetation which contributes to the wider vegetated backdrop enclosing this wider area of the north-east valley.

As with 231 Signal Hill Road, such views observe this site as part of the broader largely undeveloped slopes to the south of North East Valley which extend up to and along the skyline.

Given this context, any more intensive rural residential development is considered to conflict with significant natural landscape values which are recognised through the current SNL identification.

Recommendation

Reject appeal and maintain the existing SNL overlay and rural zone which limits potential for more intensive elevated development.

7.4.3 235 Signal Hill Road

This site covers a total area of 56 ha. between approximately 130 masl and 390 masl. The landform in this area continues part of the larger sequence of folded gullies and spurs which contain the northern edge of North East Valley and which culminate along a gently rounded ridgetop adjoining Signal Hill.

The land cover of the site is varied, with pasture, gorse and native vegetation becoming more established within gullies. The northern corner of the site adjoins North Road with a farm track connecting this area with Signal Hill Road through the site. An elevated dwelling has also been constructed in an elevated spur accessed from Signal Hill Road with a water reservoir located in the lower northern corner of the site, the base of which is located at approximately 166 masl.

As with the smaller adjoining sites, views of this site are primarily limited to within the North-East Valley and contained from wider views from within Otago Harbour to the south. Given the increased elevation of parts of this site, longer distance views are also available from the southern edge of Mount Cargill which observes the northern slopes enclosing the North-East Valley as part of the broader more extensive vegetated backdrop containing the established settlement pattern in association with the valley floor.

The open elevated form of this site is consistent with values recognised in the surrounding SNL. In this context the mapped extent of SNL includes a coherent mix of vegetation and less modified slopes which fringe adjoining development along North Road. Using the 160-metre contour in this context is considered representative of the boundary along which SNL values become more apparent.

Recommendation

Reject the appeal and maintain SNL overlay above the 160 m contour within a broader rural zone.

7.4.4 43 Watts Road (Appeal Point 14)

This site is located along a spur to the west of North-East Valley and generally more elevated than existing residential development contained along valley floor. The site contains a total area of 2.9 ha. and seeks rezoning from rural to Large Lot Residential 1.

Much of this site is subject to the existing 2GP SNL overlay which forms part of an elongated spur separating settlement in Pine Hill along part of the ridgeline from within North East Valley. The landform within this site reflects the sloping toe of a larger spur which culminates above a rehabilitated quarry accessed along North Road below. The majority of this landform is established in mature trees which characterise and contain views of elevated development beyond.

Visibility of this site is contained within areas of North-East Valley, from within which some increased visibility is apparent given this site's location on an elevated spur. Such views include

Baldwin Street to the south of the Site, which forms a local attraction recognised as the steepest street in the world (see VP 16) and adjacent residential areas from within the valley floor (see VP 17).

Given the site's elevation and extensive areas of vegetation which contribute to containing development along the valley floor in this area, there is potential that any more extensive residential land use would result in a more prominent and fragmented urban edge contrary to the softened rural edge recognised by this SNL classification. In this context, the continued SNL classification and rural zoning is supported

Recommendation

Reject the appeal and maintain SNL overlay and rural zone.

8.0 Waikouaiti Coast and Hills

The Waikouaiti Coast and Hills landscape character area forms an extensive sequence of rocky cliffs, headlands, sandy bays and wide river estuaries between Blueskin Bay and Waikouaiti along Dunedin's north coast. A small area of the Pūrākaunui SNL extends into this area at Doctors Point (see Figure 6).



Defining elements (key characteristics)

- Traditional farming settlement and farmsteads including mature hedgerows and shelterbelts with a distinct European flavour
- Rolling elevated inland agricultural landscapes with an extended coastal influence
- Focal estuarine bays and flats with associated settlement located between cliffs and prominent headland features

8.1 Area 12: Doctors Point

This area forms part of the southern tip of Blueskin Bay, adjoining a legible eroded section of historic lava flow which extends from Mopanui to the Blueskin Cliff and into local embayments associated with settlement to the south of Blueskin Bay. In this context landscape values are considered to be similar to those as described within the Pūrākaunui SNL identified in the JWS and assessed as **Area 7** above.

Whilst the existing Mount Cargill Flagstaff SNL extends to the railway line in this area, the extended SNL as identified in the JWS has been drawn to encompass the undeveloped land at the entrance to Blueskin Bay at the end of Doctors Point Road. This area expresses a coherent part of the larger visible landform enclosing Blueskin Bay and complements broader landscape values which extend above established settlement in Blueskin Bay and into the Pūrākaunui Inlet.

In this context, such extension of this SNL to MHWS is considered to be more consistent with existing landscape values which extend into Pūrākaunui Bay and appropriately recognises the significant natural landscape values in this area. The Pūrākaunui SNL can be combined with the northern part of the Flagstaff- Mount Cargill SNL created by the inclusion of the Orokunui Ecosanctuary within an ONL.

Recommendation

Support this appeal to extend SNL to include Doctors Point as identified in the Pūrākaunui SNL identified in the JWS Landscape Assessment.

8.2 Waikouaiti - Site Specific Appeals

A cluster of contiguous site-specific appeal sites have been identified in this landscape character area to the north of Doctors Point Road at 135 and 145 Doctors Point Road (see **Figure 6**).

8.2.1.1 135 and 145 Doctors Point Road (Appeal Point 17)

These sites are located to the south of Doctor's Point along the southern edge of Blueskin Bay, between the main trunk railway and the vegetated margins of the coastal edge. These sites are not subject to any existing landscape overlay and are predominantly located inland of the coastal environment as previously defined to inform the 2GP (Mike Moore et al., 2015). This land is currently zoned Rural Residential in the 2GP with the appellant seeking a more permissive residential zone which allows up to 45 lots.

The landform in this area reflects a low rolling spur contained between the main trunk railway line, Doctors Point Road and the edge of Blueskin Bay. Vegetation has typically been established along coastal margins and the boundaries of adjoining transport corridors and

contains local views. Mature vegetation frames the coastal edge and forms an established framework through which individual rural residential lots could potentially be visually contained.

Near distance views of the site are generally curtailed by vegetation adjacent to the road and railway corridors (see **VP 18**). To the north-east of this site, views from Doctors Point are typically curtailed by harbourside vegetation framing the Site and seen in the context of established residential development in low lying areas (see **VP 19**). Similar, albeit more fleeting longer distant views are available from the north across broad areas of Blueskin Bay and including parts of State Highway 1 passing adjacent to Blueskin Bay (see **VP 20**).

Given the established residential context apparent along this area of Doctor's Point and the ability to contain development within this more modified residential context along the coastal environment, development of clusters of residential development consistent with this appeal is supported without comprising wider significant natural landscape values.

Recommendation

Support appeal in principle in terms of ability to accommodate clusters of more intensive residential development without comprising identified significant natural landscape values. The design and layout of a proposed development in the context of mature vegetation on the site will determine the landscape and visual effects.

9.0 Conclusion

The 2GP landscape methodology is generally considered robust in terms of informing how important landscape values are defined. Notwithstanding this, the ridgetops of Mihiwaka, Mount Cargill and Peninsula Harbourside are considered to have outstanding natural landscape values which warrant some expansion of classified landscapes in these areas. Similarly, some local refinement is supported in the Outer Harbour to extend landscape overlays to MHWS and expand ONL to encompass parts of the northern harbour entrance at Aramoana and associated ridgetops outside the identified Native Reserves.

Within the inner harbour much of the harbour edge has been modified to the extent that no longer expresses coherent natural landscape values. Accordingly, the more nuanced approach to landscape evaluation which separates the more modified lower slopes from more natural slopes above as identified in the notified 2GP is generally supported in this area. Similarly, SNL is supported in association with Pūrākaunui Inlet which culminates along a legible coastal edge encompassing Doctors Point.

In terms of appeal sites assessed in tandem with this peer review, support for increased capacity of development is given in lower parts of the inner harbour and lower area of Blueskin Bay. Such land is already characterised by surrounding development to the extent that more significant natural landscape values with potential to be comprised by increased development are no longer apparent. Elsewhere in more elevated and less developed areas of the inner and outer Otago Harbour and North East Valley, sites are generally considered more natural and less influenced by adjoining settlement to the extent that increased residential activity has potential to generate more significant landscape effects.

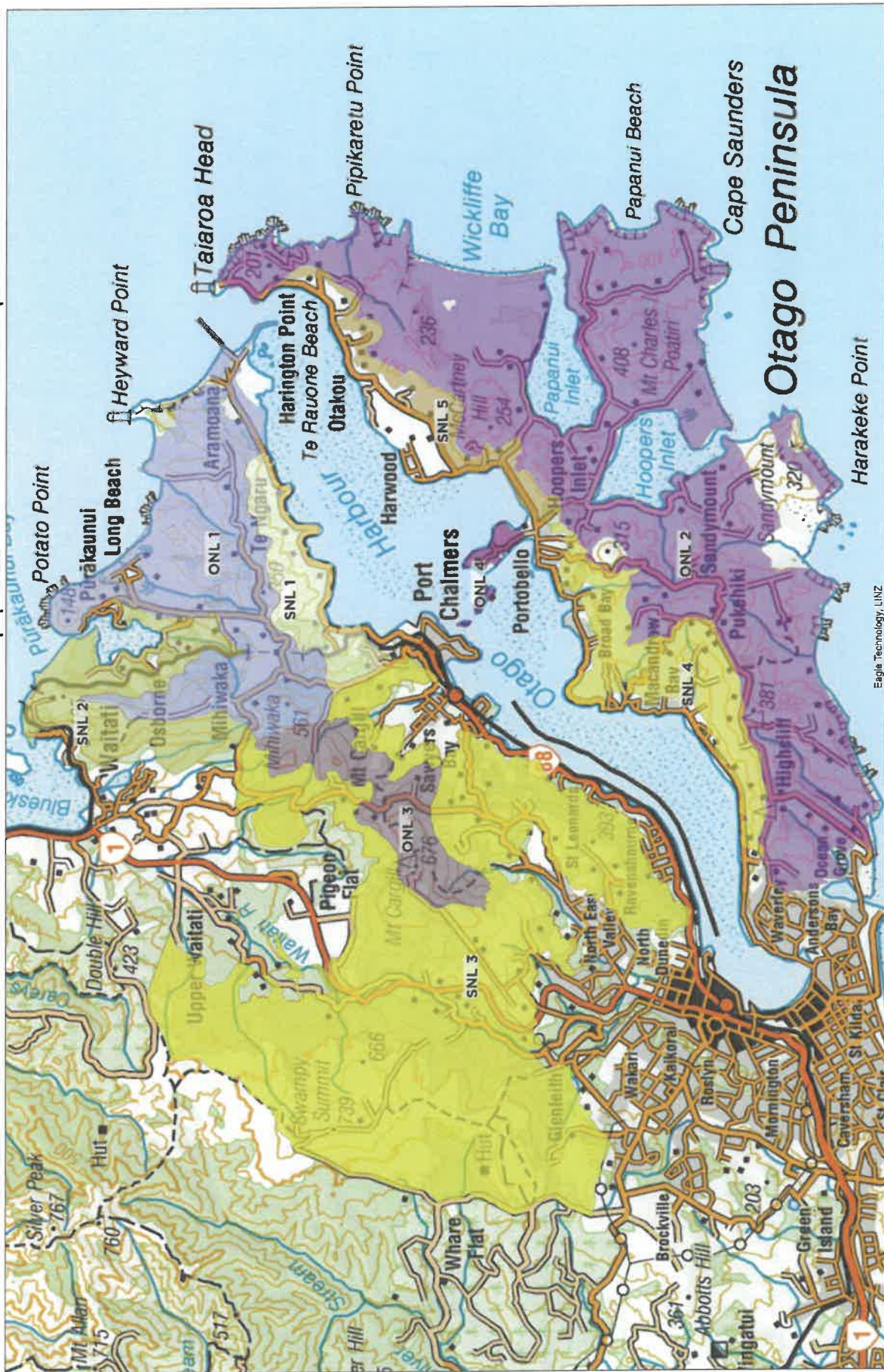
10.0 References

- Boffa Miskell, (2007). *LMA Review*. Prepared by Boffa Miskell Limited for Dunedin City Council. Report No. C06051.
- Boffa Miskell, (1998). *Otago's Natural Character, Landscape and Significant Natural Areas*. Prepared by Boffa Miskell Ltd. for Otago Regional Council. Report No. C7255-15.
- Lucas, D. & Moore M., (2020) *Joint Witness Statement*:
- Miller, R. (2010) *Rural Character Assessment, Dunedin City*. Prepared by Boffa Miskell Limited for Dunedin City Council.
- Moore, M. (2013) *Dunedin City: Assessment of current Landscape Conservation Areas for District Plan Review*. Prepared for Dunedin City Council.
- Moore, M., et al., (2015) *Coastal Environment of Otago Natural Character and Outstanding Natural Features and Landscapes Assessment: Dunedin Section*. Prepared for Dunedin City Council.
- Quality Planning (2013) *Landscape: Topic Paper*. Prepared by Boffa Miskell Limited for the Ministry for the Environment.

Appendix 1: Differences in Landscape Attributes Applied

	Otago's Natural Character Landscape and Significant Natural Areas (Boffa Miskell, 1998)	LMA Review (Boffa Miskell, 2007)	Dunedin City, Assessment of current Landscape Conservation Areas for District Plan Review (Mike Moore, 2013)	Coastal Environment of Otago Natural Character and Outstanding Natural Features and Landscapes Assessment: Dunedin Section (Mike Moore et al., 2015)	Joint Witness Statement (2020)
Landscape Attributes / Dimensions					
Biophysical / Natural Science	Natural values	Natural Factors and Legibility (incorporates natural character considerations)	Biophysical factors	- Natural science factors, including geological, topographical, ecological and dynamic components - The presence of water including in seas, lakes, rivers and streams - Vegetation (native and exotic)	- Natural science factors, including geological, topographical, ecological and dynamic components, and as mātauraka Māori - The presence of water including in seas, lakes, rivers and streams - Vegetation (native and exotic)
Sensory / Perceptual	- Aesthetic values; - Legibility values;	Aesthetics and Amenity	- Naturalness - Aesthetic values and memorability - Expressiveness / legibility - Transient Values	- Legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes - Aesthetic values including memorability and naturalness; - Transient values, including presence of wildlife or other values at certain times of the day or year - Wild or scenic values	- Legibility or expressiveness – how obviously the feature or landscape demonstrates its formative processes - Aesthetic values including memorability (pupuri), and naturalness. - Transient values including presence of wildlife or other values at certain times of the day, night, season or year - Wild or scenic values.
Associative Values	- Popular shared and recognised values; and - Takata whenua	Cultural and Historic Associations	- Shared and recognized values - Tangata Whenua values - Historical Associations	- Whether the values are shared and recognised; - Cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features; - Historical and heritage associations;	- Whether the values are shared and recognised - Cultural and spiritual values for Kāi Tahu, identified by working as far as practicable, in accordance with tikanga Māori, including their expression as cultural landscapes and features - Historical and heritage associations

Appendix 2: Landscape Evaluation



ONL1: Mihiwaka to Heyward Coast		BML Ratings
Biophysical values:	i. Eroded multi-era volcanic landscape, which remains legible in the topography and in rock exposures through limited landform modification ii. Sequence of geopreservation sites include the North Dunedin phonolite domes (Mihiwaka, Mopanui and Hare Hill), and Aramoana-Heyward Point lava flows along the ridgetop crest iii. High natural character values of the waterways, coastal environment and wetland areas iv. Jennings Creek Marsh and Whareakeake Marsh are regionally significant wetlands in the Otago Regional Plan: Water and are both scheduled as Area of Significant Biodiversity Value. See Appendix A1.2 (C146 and C160) v. Areas of regenerating forest or remnant forest including on the slopes of Mopanui and Mihiwaka and Mihiwaka Valley vi. Aramoana beach provides a habitat for Hoiho (yellow eyed penguin). vii. Part of the Ōrokonui Ecosanctuary including visitor facilities and an associated predator proof fence.	High
Sensory values	i. Highly memorable landscape due to the volcanic landform structure surmounted by Mihiwaka and Mopanui and extending down to the coast between Potato Point, and Aramoana ii. The landscape is highly expressive of the eroded volcanic landform and marine erosive and depositional processes, including at the harbour mouth and other headlands through to Potato Point iii. Remote with limited structures with a sense of wildness and isolation including its open ocean facing aspect iv. Legibility of the natural landform and associated visual coherence of the landscape i.e. patterns of land use reflecting the topography with low impact of built elements, earthworks, and exotic tree plantings which retain an uncluttered character v. High rural amenity values and scenic values of this diverse mountain to sea landscape vi. Natural darkness of the night sky vii. The natural tidal rhythm of the ocean interfaces viii. The extent and quality of views across the landscape from public roads and tracks ix. Transient values include the mist and cloud which frequent the hilltops of the Mihiwaka-Aramoana ONL	High
Associative values	i. Values of significance to Manawhenua. Wāhi tūpuna include Whareakeake beach, Wharauwerawera (Long Beach), with parts of the ONL also intersecting with wāhi tūpuna overlaying Mihiwaka, Potato Point and the views from Ōtākou Marae (see Appendices A4.19, A4.20, A4.28 and A4.14). Mihiwaka is a cultural identity marker for Kāi Tahu. ii. An ancient settlement and Pa were sited in the bush behind the beach at Whareakeake and this was the site of an infamous fight between the brig Sophia and local Māori iii. Both Aramoana and Wharauwerawera (Long Beach) are of significance for Mahika kai and Kāika values. There were settlements on the Aramoana spit and against the hill close to the present-day settlement iv. Popular recreational destinations include the Heyward Point Track, Aramoana beach and mole, and Whareakeake beach. v. Long Beach was a popular camping and picnic destination for Dunedin families from around 1900 and was later developed as a crib settlement vi. Historic and cultural features which are relics of the past and sensitive to change, e.g. remnant shelter plantings vii. Legacies of early European Settlement including historic buildings and structures, plus shelter and amenity planting viii. Returning servicemen settled in this area and established dairy farms ix. Aramoana is associated with the 1990 massacre and the "Save Aramoana Campaign" to stop a proposed aluminium smelter x. The Aramoana Mole and pilot houses are heritage structures	High
Overall Rating	Outstanding Natural Landscape	

ONL2: Otago Peninsula		BML Ratings
Biophysical values:	i. The complex geological history, with the series of volcanic eras beginning 15 million years ago displayed across and along the Peninsula, and their interface with deposition lands resulting in important displays of geodiversity. ii. Distinctive natural landforms include Peggys Hill, Sandfly Bay dunefields and Sandymount Sea Arch iii. Geology and vegetative cover reflect the extreme climatic conditions of the area iv. Tall cliffs, bays and beaches result from the high level of coastal erosion v. Sea stacks and extensive sand blown dunes, as well as dramatic cliff features vi. Geological features include the Sandymount Sea Arch and Terracettes vii. Hoopers and Papanui Inlets and associated dunefields are significant depositional features viii. Native coastal bush remnants contained within steep gullies and on cliffs at Ōkia Reserve ix. Saltmarsh and salt meadows provide valued habitat for numerous native and exotic species at the Papanui and Hoopers Inlets x. Coastal wildlife includes internationally renowned colonies of Toroa/Northern Royal Albatross and Hoiho / Yellow-Eyed Penguin as well as New Zealand sea lions and seals xi. Identified significant wetlands (Otago Regional Plan: Water) include: Papanui Inlet Salt Marsh, Ōkia Flat dune hollows, and Hoopers Inlet swamp xii. The interplay between marine and terrestrial environments xiii. Areas of remnant / regenerating forest and duneland / wetland (e.g. Taiaroa Bush and Ōkia Reserve)	High
Sensory values	i. Volcanic formative processes remain highly legible ii. Striking and dramatic landscape reflecting the extreme climatic conditions on the seaward flank and rounded volcanic-coned summits and ridgetops which contain and define the harbour iii. The dominance of underlying natural patterns, processes and elements iv. The characteristic and signature biota evident or known; terrestrial, avian and marine v. High aesthetic and coherence provided through the range and drama of the array of landforms experienced as encircled by the contrasting lengths of ocean coast and inlets. vi. Qualities of wilderness and isolation and associated scenic qualities including the natural darkness of the night sky. vii. Transient values include opportunities to view the Aurora Australis from Hoopers Inlet, as well as the presence of wildlife e.g. penguins, albatross, sea lions, seals), the biota of reef and inlet habitats, the weather - storms, southerly winds and presence of fog, sea state, and, light effects viii. Widely recognised views across the landscape from public roads and tracks ix. Low impact of built elements, earthworks and exotic tree plantings and the significant relative dominance of natural landscape elements	High
Associative values	i. Values of importance to Manawhenua: Various peninsula slopes and summit lands are important to Te Rūnanga o Ōtākou tribal identity including the Upper slopes and peaks of Otago Peninsula recognised as wāhi tupuna ii. This landscape adjoins Pukekura (Taiaroa Head), a significant pā and kāika site. iii. Associations with the Native Reserve lands. The Native Reserve land at the eastern end of the Peninsula was retained by Kāi Tahu during the land sales of 1844 and a strong ancestral connection is felt to this area of historic settlement and use by Manawhenua. It has a number of significant values including Pā tawhito, Tūāha, Wāhi pakanga, Urupā, Kāika, Wāhi taoka, Mahika kai, Ingoa tawhito and Mana. iv. Ancient villages dating back to Waitaha and Kāti Mamoe settlement existed at Ōkia Flats and Papanui Inlet, with numerous urupā, wāhi taoka and middens (including moa remains) in these areas. Other kāika were also located in the outer parts of Otago Peninsula. v. Several important historic and heritage associations including Larnach Castle and stables within the Otago Harbour vi. Legacies of early European settlement including historic buildings and structures and shelter and amenity plantings vii. Important tourist destination for wildlife observation incorporating local walks and nature reserves viii. A night sky with outstanding capacity to view astronomical features	High
Overall Rating	Outstanding Natural Landscape	

ÖNL3: Mt Cargill / Kapukataumahaka		BML Ratings
Biophysical values:	i. Mount Cargill, Butters Peak and Mount Holmes remain as largely intact volcanic landforms along the skyline ii. Contains an intact group of four volcanic domes including Mount Kettle, Mount Cutten (excluding the quarry), Mount Cargill and Mount Martin iii. Large area of regenerating indigenous forest on the northern and southern slopes of Mount Cargill considered to be of important biodiversity value including values wildlife iv. Silver Beech forest is present in the Mount Cargill Scenic Reserve and is one of four remaining remnants in the Dunedin Ecological District (DCC, 2006) as well as <i>Ozothamnus / Dracophyllum</i> shrubland.	High
Sensory values	i. Volcanic formative processes remain highly legible ii. Memorable feature within the Otago Harbour landscape and easily viewed from both the Otago Harbour and State Highway 1 in the north iii. High naturalness values and coherence associated with the regenerating indigenous forest iv. Transmission tower on Mount Cargill appears as isolated landmark in context of very high natural values v. Low impact of built elements and earthworks, of exotic tree plantings, and the significant relative dominance of natural landscape elements vi. Naturalness attributes of the rural landscape which provide backdrop and containment to the discrete harbourside settlements. vii. Transient values include the mist and cloud which frequent the hilltops, seasonal snow cover, and the wide range of bird life which inhabit the forest	High
Associative values	i. Significant to Manawhenua as a dominant landscape feature and a cultural identity marker (wāhi tohu). Mt Cargill/Kapukataumahaka forms part of the sequence of peaks from Mihiwaka and Mt Kettle to Mt Cargill/Kapukataumahaka recognised as wāhi tūpuna. ii. Important views from Ōtākou Marae across the harbour and its enclosure, with the peaks visible from the marae an important cultural marker. iii. High recreational value with tracks leading to the summit of Mount Cargill and to the Organ Pipes (Mount Holmes) offering panoramic views of the city.	High
Overall Rating	Outstanding Natural Landscape	

ONL4: Harbour Islands and Portobello Peninsula		BML Ratings
Biophysical values:	i. Legible remnants of the Dunedin Volcano Vent ii. Intact volcanic landforms which are expressive of their formative processes iii. The natural character values of the coastal environment iv. Very limited modification along the coastal edge retains dynamic cues to natural land-sea relationships v. Goat Island remains covered in intact indigenous bush including ngaio and kōhūhū forest vi. Quarantine Island and Portobello Peninsula contain areas of regenerating indigenous bush vii. Both Quarantine Island and Goat Island are breeding sites for marine birds such as shags viii. Indigenous biodiversity and habitat for indigenous wildlife	High
Sensory values	i. Highly legible volcanic landforms and retention of indigenous vegetation ii. Visual coherence of the landscape i.e. patterns of land use reflecting the topography with few structures iii. Memorable and central features within the Otago Harbour landscape and a natural focal point for the city iv. High rural amenity values due to coherent pastoral landscape with areas of regenerating indigenous vegetation v. Transient values include interactions with the tides, and seasonal occupation by marine birds vi. High wildness, isolation and scenic values and interactions with the coastal environment, legibility of the volcanic landforms and retention of indigenous vegetation vii. High sense of remoteness viii. Low impact of built elements, earthworks, and exotic tree plantings and the significant relative dominance of natural landscape elements ix. Naturalness of landforms x. The quality of views to and across the three natural features forming the landscape xi. The distinctiveness of each natural feature and their harbour relationships	High
Associative values	i. High scenic values associated with the wider volcanic landscape ii. Rakiriri Island and Kamau Taurua Island are wāhi tūpuna to Kai Tāhu, with the ONL also contributing to the wider Ōtākou harbour cultural landscape. Rakiriri is a very sacred (wāhi tapu) site, being the traditional home of Takaroa, the guardian of the sea. Kamau Taurau was the site of a kāika or settlement. iii. Both islands were used for Quarantine purposes and the structures associated with this still remain, particularly on Quarantine Island iv. Both Quarantine and Goat Island have Heritage New Zealand Historic Area classifications v. Historic structures wharves and roads present	Very High
Overall Rating	Outstanding Natural Landscape	

SNL1: Careys Bay to Te Ngau		BML Ratings
Biophysical values:	i. Seaward flanks to the harbour display earlier eroded volcanic formations ii. Intact basalt volcanic landforms supporting rural land use with limited structures iii. Mosaic of rural land use including areas of pasture with regenerating native species and exotic forestry iv. Secondary native forest above Deborah Bay	Moderate-High
Sensory values	i. High rural amenity values expressing a mosaic of rural land use ii. Low impact of built elements, earthworks, and exotic tree plantings, and the significant relative dominance of natural landscape elements iii. Modified road and seawall with pockets of residential development along harbour edge iv. Volcanic landform remains expressive of formative processes above accessible harbour edge v. Transient values include the mist and cloud which obscure the hilltops and upper slopes vi. Qualities of wilderness and isolation and natural darkness of the night sky vii. Natural tidal rhythms of harbour interface viii. Scenic values which contribute to the diverse mountain to sea landscape ix. The extent and quality of views across the landscape from public roads and tracks	Moderate-High
Associative values	i. Identified as wāhi tūpuna - views from Ōtākou Marae across the Upper Harbour. ii. Relationship with Mihinwaka, a cultural identity marker for Kāi Tahu. iii. Otaheiti (Acheron Point) was the site of a Pā and the home of the rakatira Taiaroa before he lived at Ōtākou. Values include Pā tawhito and Urupā iv. Backdrop to the harbour which is significant for mahika kai v. Legacies of early European settlement including historic buildings and structures, plus shelter and amenity plantings.	High
Overall Rating	Significant Natural Landscape	

SNL2: Pūrākaunui and Ōrokonui		BML Ratings
Biophysical values:	i. Intact drowned valley and intertidal estuary ii. Pūrākaunui Inlet is a regionally significant geopreservation site considered an easily accessible, almost pristine example of a small drowned valley forming an intertidal estuary with a sand dune barrier across the entrance iii. The coastal edge of Doctors Point is part of the Blueskin Bay Geopreservation Inventory iv. Areas of Significant Biodiversity Value along the edge of the Pūrākaunui Inlet including natural coastal-estuarine habitats v. Presence of native scrub, duneland and regenerating native forest vi. Ōrokonui Ecosanctuary – predator proof habitat for native flora and fauna	High
Sensory values	i. High rural amenity value expressing a mosaic of rural land use ii. The landscape is remote from major urban centres or main roads but is the landscape context for the settlements of Pūrākaunui and Osborne iii. Coherent and memorable volcanic landform and high naturalness based on the presence of areas of native vegetation and the vegetation pattern that generally reflects the landform iv. Sense of remoteness in places due to the limited impact of buildings and other structures, and the open ocean facing aspect v. Part of a broader legible volcanic landform vi. Low impact of built elements, earthworks, and exotic tree plantings, and the significant relative dominance of natural landscape elements. vii. Naturalness of the Inlet slopes, the ridgeline and the coastal landforms viii. The extent and quality of views across the landscape from public roads and tracks ix. Naturalness attributes of the rural coastal landscape which contributes to the Inlet setting x. Transient values include a birdlife in the inlet and coastal cloud cap xi. For Manawhenua, the outer lands including the Promontory BB, the forest blanketed sand barrier, and, the ocean coast from Pūrākaunui Bay and Māpoutahi around Blueskin Cliff to Doctors Point, contribute high pupuri / memorability	Moderate-High
Associative values	i. Māpoutahi is an ancient Pā site and the site of a battle. ii. Pūrākaunui Bay is an important mahika kai area, the site of a former kāika, and also contains urupā. iii. Forms the setting of the popular recreational destinations/lifestyle settlements of Pūrākaunui and Osborne iv. Returning servicemen settled in this area and established dairy farms v. Pūrākaunui Inlet was the site of whaling activity	High
Overall Rating	Significant Natural Landscape	

SNL3: Flagstaff - Mt Cargill		BML Ratings
Biophysical values:	i. The extent and integrity of the natural landscape elements including wildlife ii. Flagstaff Peak patterned ground is a regionally significant geopreservation site iii. Volcanic Peaks and associated landforms including the summits of Flagstaff and Swampy Summit and the sequence of legible eroded volcanic spurs which extend below the summit iv. Podocarp Broadleaf forests e.g. Grahams Bush v. Cloud forest (Libocedrus and podocarps) on Leith Saddle vi. Broadleaf forest e.g. Orokonui / Burns Park vii. Regenerating indigenous forest on the slopes of Flagstaff viii. <i>Ozothamnus</i> / <i>Dracophyllum</i> shrublands at Swampy Summit ix. Snow tussocklands on Flagstaff	Moderate-High
Sensory values	i. Volcanic landscape which remains expressive of its formative processes ii. Legibility of the natural landform and associated visual coherence of the landscape i.e. patterns of land use reflecting the topography iii. Low impact of built elements, earthworks, and exotic tree plantings, and the significant relative dominance of natural landscape elements. iv. Naturalness of elevated landforms. v. Landform and vegetative altitudinal connectivity present vi. The extent and quality of views across the landscape from public roads and tracks. vii. Naturalness attributes of the rural landscape which provides backdrop and containment to the discrete harbourside settlements. viii. Naturalness of the foreground to the Mt Cargill ONL above ix. Forms much of the backdrop to urban Dunedin, much of the north-western side of Otago Harbour and the Blueskin Bay area x. The landforms are striking and memorable and many are iconic landmark features of Dunedin xi. Native vegetation cover and vegetation patterns that reflect the natural topography and natural skylines xii. Has very high levels of visibility from significant population centres and major roads xiii. High rural amenity value xiv. Transient values include the cloud cap and seasonal snow cover and wildlife xv. The ridges and peaks are connected by a network of popular walks and mountain bike tracks incorporating scenic recreation and nature reserves xvi. Expansive and panoramic views over Dunedin city and beyond are afforded from the accessible summits xvii. Overall, the landforms are striking and memorable and many are iconic landmark features of Dunedin	Moderate-High
Associative values	i. Flagstaff (Whānau-paki) is considered wāhi tupuna, is referred to in mihi as a cultural identity and is a boundary marker between hapū. ii. Both Flagstaff (Whānau-paki) and Swampy Summit (Whawha-raupō) were part of traditional trails (ara tawhito) running between the Taieri Plain and Blueskin Bay. iii. The ring of encircling hills has been referred to as the outer town belt iv. The hilltops are distinctive city landmarks and provide a natural approach to the city v. Flagstaff refers to the flagpole that was used in early European times to alert the wider population that a ship had entered the harbour. An alternative explanation is that the name refers to the poles that were used to mark the original track northwards from Dunedin which ran along the Flagstaff and Swampy summit tops to Hightop vi. Historic buildings and structures and shelter and amenity plantings are present	Moderate-High

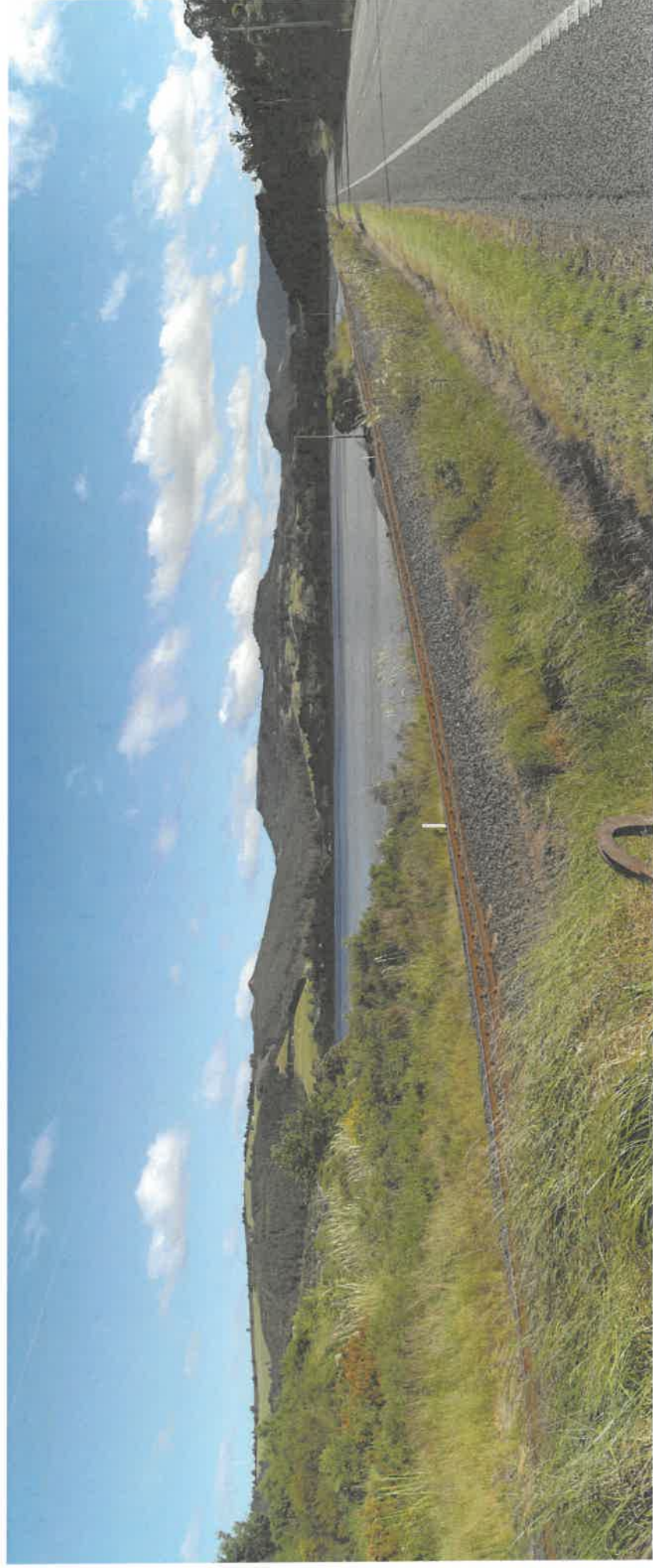
	vii.	Heritage landscape qualities including the legibility of the previous more intensive dairy farming land use	
Overall Rating	Significant Natural Landscape		

SNL4: Inner Peninsula Bays			BML Ratings
Biophysical values:	i. Defining elements include steep spur and gully hillsides descending from prominent volcanic ridgelines ii. Eroded volcanic landform remains legible iii. The iconic Harbour Cone (an ONF) and its surrounding area provide a significant backdrop to the harbourside settlements of Broad Bay and Portobello iv. Small areas of regenerating indigenous forest v. Interconnections with the marine environment vi. Indigenous biodiversity and habitat for indigenous wildlife		Moderate – High
Sensory values	i. Legibility of the natural landform and associated visual coherence of the landscape i.e. patterns of land use reflecting the underlying topography ii. Naturalness of landforms, including lowlands, slopes, summits and ridgelines iii. Naturalness attributes of the rural landscape which provide backdrop and containment to the discrete harbourside settlements iv. The extent, integrity, coherence and naturalness of the major natural elements such as landform, streams and areas of indigenous vegetation. A key feature here is the extent and quality of areas of regenerating indigenous bush v. Outstanding panoramic views which are available both of the area and from the area vi. Expressive of the landscape's eroded volcanic formative processes vii. High rural amenity with low impact of built elements, earthworks, exotic tree plantings, and the significant relative dominance of natural landscape elements viii. Open views across the landscape from roads and tracks		High
Associative values	i. The upper slopes and peaks of the Peninsula are highly valued including by Manawhenua and have wāhi taoka values. ii. High tourism and recreational values iii. European cultural features throughout the area include drystone walls and remnant Macrocarpa shelter trees and building sites iv. Rural character contributes to the shared and recognised natural and amenity values of the harbour landscape v. Otago Peninsula has high tourism and recreational values and is viewed as a special area of Dunedin		High
Overall Rating	Significant Natural Landscape		

SNL5: Ōtākou		BML Ratings
Biophysical values:	i. Part of the Otago Harbour volcanic caldera landscape between Taiaroa Head and Portobello Peninsula ii. Geopreservation sites include the regionally significant Harwood stranded sea cliffs and Harwood earth flow iii. Small areas of regenerating indigenous forest iv. Interconnections with the marine environment	Moderate – High
Sensory values	i. High rural amenity ii. Naturalness of landforms, including lowlands, slopes, summits and ridgelines iii. Highly legible natural landform expressive of the landscape's eroded volcanic formative processes iv. Naturalness attributes of the rural landscape which provide backdrop and containment to the discrete harbourside settlements v. The extent, integrity, coherence and naturalness values of the major natural elements such as landform, streams and areas of indigenous vi. Part of a broader memorable harbour landscape based on the enclosure of settlements, well-vegetated or pastoral slopes and landform-dominated rural landscape vii. Naturalness is somewhat modified by adjoining settlements, harbourside roads and reclamation viii. Low impact built elements and earthworks through exotic tree plantings ix. Part of a broader memorable harbour landscape based on the enclosure of settlements, well-vegetated or pastoral slopes and landform-dominated rural landscape x. Has natural characteristics which contrast with the developed harbour edge settlements, and which provide a fundamental characteristic of the harbour landscape xi. Transient values include lighting effects on the hillslope and various moods associated with different weather conditions	High
Associative values	i. The upper slopes and peaks of the peninsula are highly valued including by Manawhenua and have wāhi taoka values. ii. Ōtākou Marae Reserve is the cultural and ceremonial centre of the local hapū. iii. The Native Reserve land at the eastern end of the Peninsula was retained by Kāi Tahu during the land sales of 1844 and a strong ancestral connection is felt to this area of historic settlement and use by Manawhenua. It has a number of significant values including Pā tawhito, Tuāhā, Wāhi pakanga, Urupā, Kāika, Wāhi taoka, Mahika kai, Ingoa tawhito and Mana. The promontory at Ōhinetū Point is a natural landmark and has historic significance. iv. Otago Peninsula has high tourism and recreational values and is viewed as a special area of Dunedin v. Historic cultural features throughout the area include drystone walls and remnant Macrocarpa shelter trees and building sites	High
Overall Rating	Significant Natural Landscape	

Dunedin 2GP Landscape Appeals

FIGURES AND SITE SPECIFIC APPEAL PHOTOGRAPHS
5 July 2021



Document Quality Assurance

Bibliographic reference for citation: Boffa Miskell, 2021. <i>Dunedin 2GP Assessment: Site Specific Appeals</i> Report by Boffa Miskell Limited for Dunedin City Council.			
Prepared by:	Hannah Wilson Landscape Planner Boffa Miskell		
Reviewed by:	Rhys Girvan Senior Principal Landscape Architect Boffa Miskell Ltd		
Status: Final	Revision / version: 2	Issue date: 5 July 2021	

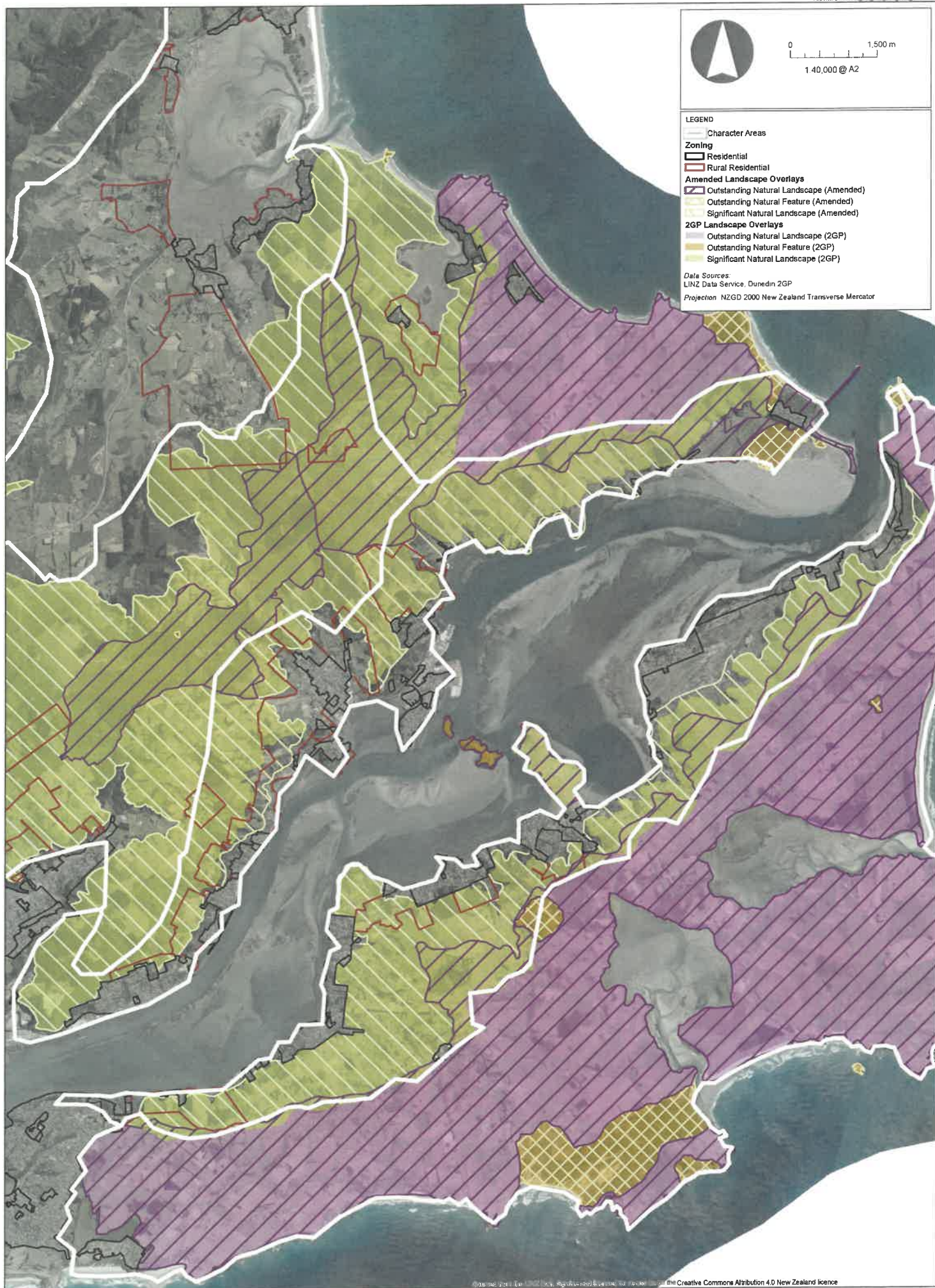
File ref: BM200702_Graphic_Supplement_Pans

Cover photograph: Blueskin Bay, © BML, 2020

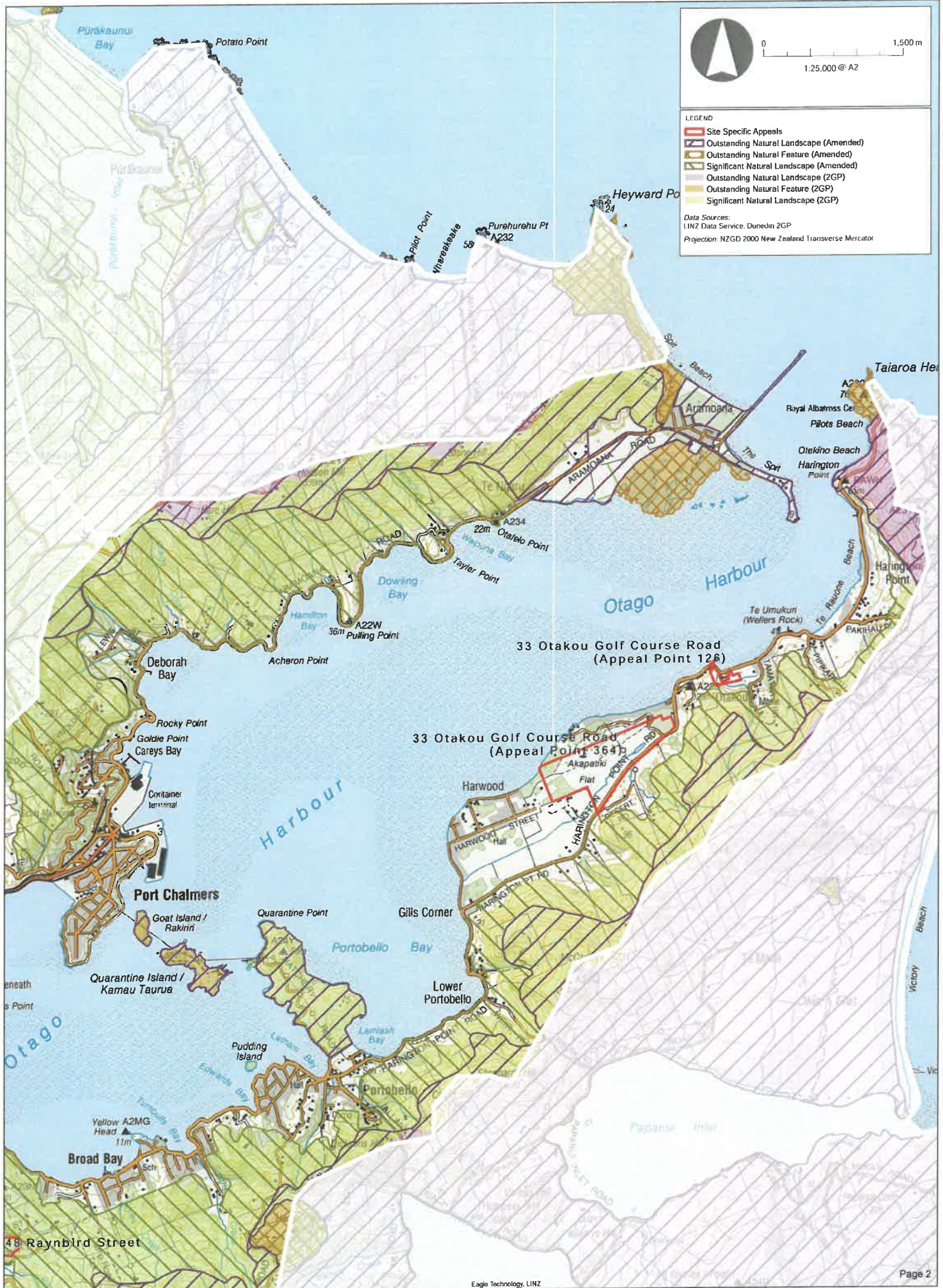


Contents

Figure 1: Amended Landscape Overlays	1
Figure 2: Otago Harbourside Character Area (Outer Harbour)	2
Figure 3: Otago Harbourside Character Area (Inner Harbour)	3
Figure 4: Heyward Coast Character Area	4
Figure 5: Flagstaff Mount Cargill Character Area	5
Figure 6: Waikouaiti Coast & Hills Character Area	6
Figure 7: ONLs and SNLs	7
VP1 - VP2: 33 Golf Course Road (Appeal Point 126)	8
VP3 - VP4: 33 Golf Course Road (Appeal Point 364)	9
VP5 - VP6: Inner Harbour (south side) & 457 Highcliff Road	10
VP7 - VP8: 603 High Cliff Road	11
VP9 - VP10: 48 Raynbird Street	12
VP11 - VP12: 48 Raynbird Street & 231, 233 & 235 Signal Hill Road	13
VP13 - VP14: 231, 233 & 235 Signal Hill Road	14
VP15 - VP16: 231, 233 & 235 Signal Hill Road & 43 Watt Road	15
VP17 - VP18: 43 Watt Road & 135 – 145 Doctors Point Road	16
VP19 - VP20: 145 Doctors Point Road	17



Copyright 2021. All Rights Reserved. Licensed for private use under the Creative Commons Attribution 4.0 New Zealand licence



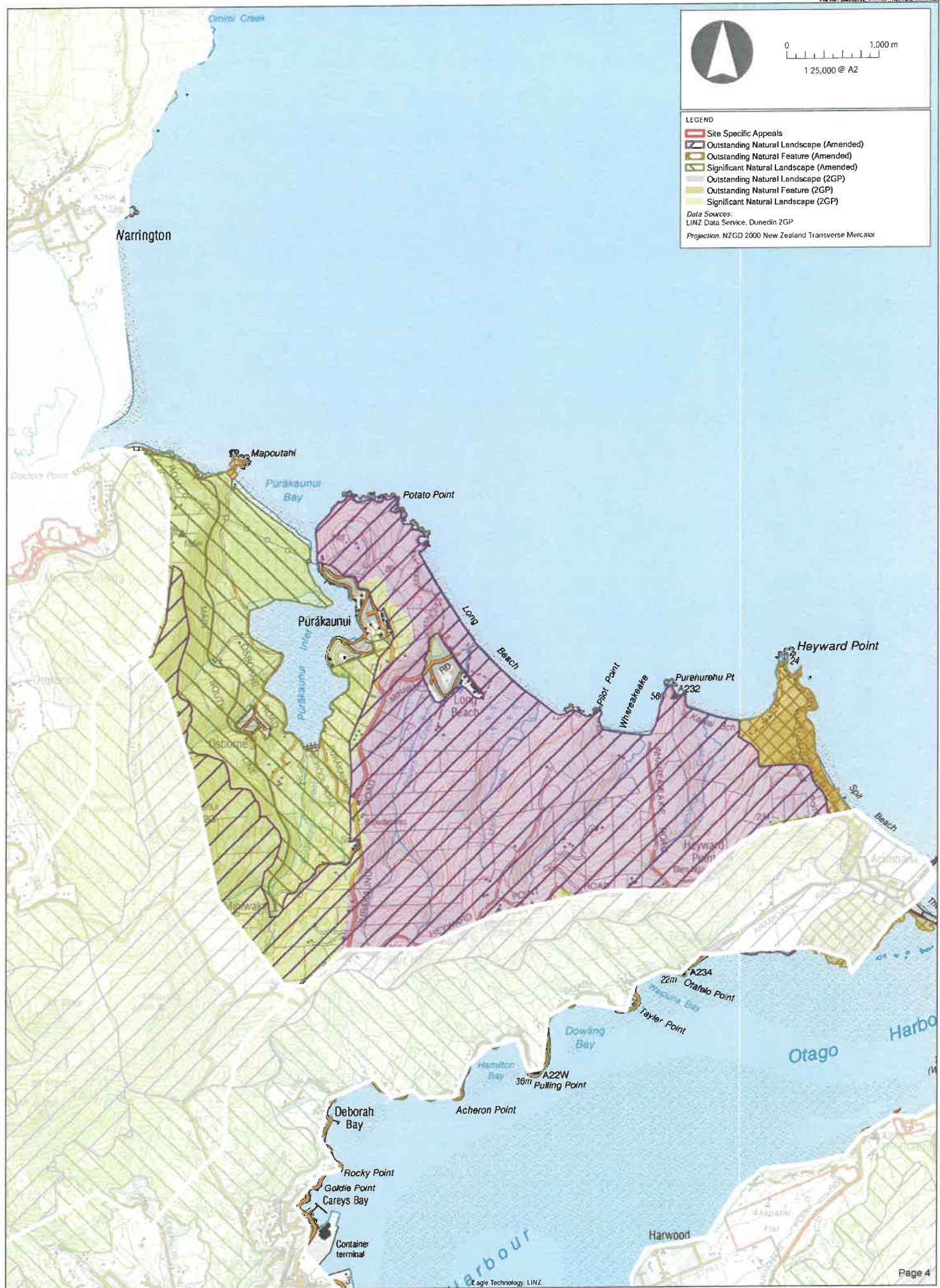
Eagle Technology, LINZ

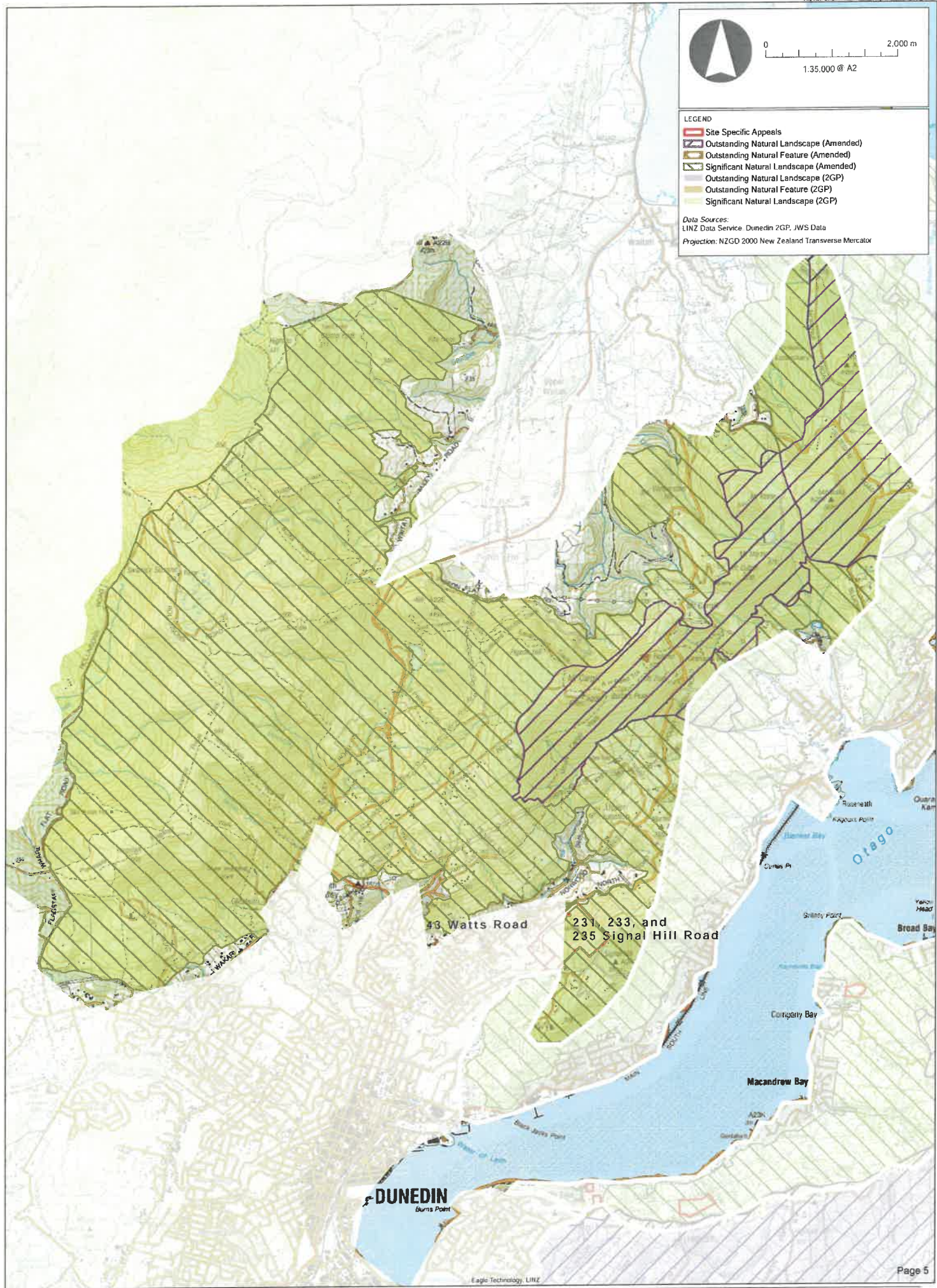
Page 2



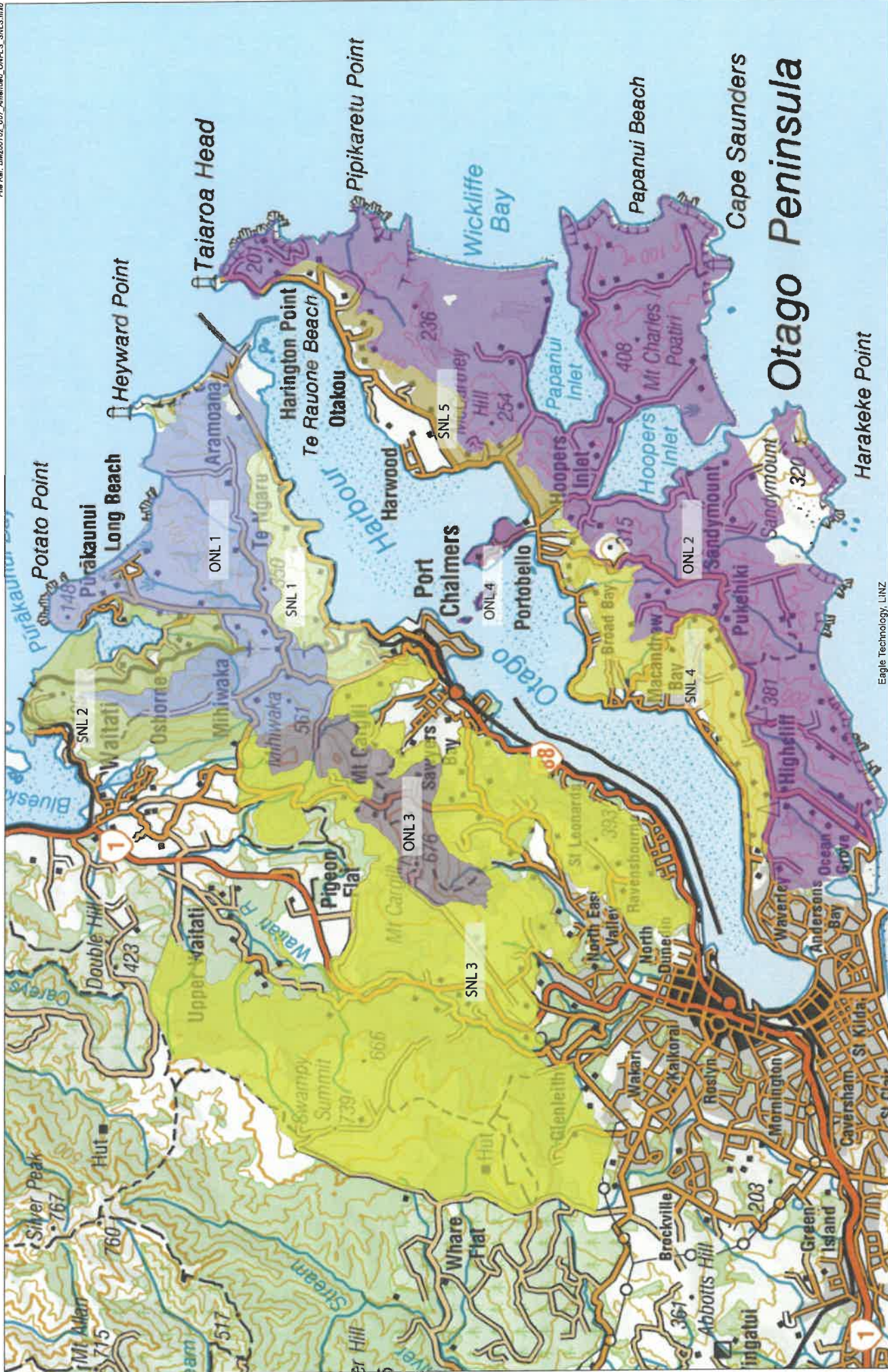
Eagle Technology, LINZ

Page 3









Boffa Miskell

www.boffamiskell.co.nz

The data has been prepared by Boffa Miskell Limited on the basis of information provided by the Client. It is subject to our Client's specific instructions and is not to be used for any other purpose. Any use of the data for any other purpose is at the user's risk. Boffa Miskell Limited does not accept any liability for any loss or damage arising from the use of the data for any other purpose. Boffa Miskell Limited is not responsible for any loss or damage arising from the use of the data for any other purpose. Boffa Miskell Limited is not responsible for any loss or damage arising from the use of the data for any other purpose.

Scale: 1:80,000 @ A3

0 2,500 m

LEGEND

Outstanding Natural Landscapes

- ONL 1: Mitihiwaka to Heyward Coast
- ONL 2: Otago Peninsula
- ONL 3: Mount Cargill / Kapukataumahaka
- ONL 4: Harbour Islands and Portobello Peninsula

Significant Natural Landscapes

- SNL 1: Careys Bay to Te Ngau
- SNL 2: Pūrakau and Ōrokonui
- SNL 3: Flagstaff-Mt Cargill
- SNL 4: Inner Peninsula Bays
- SNL 5: Ōtakou

DUNEDIN 2GP: METHODOLOGY REVIEW

Figure 7: ONLs and SNLs

Date: 28 June 2021 | Revision: 2

Plan prepared for Dunedin City Council by Boffa Miskell Limited

Project Manager: mark.brown@boffamiskell.co.nz | Drawn: HMI | Checked: RGI

Page 7



VP1: View from Harington Point Road

33 Golf Course Road (Appeal Point 126)

33 Golf Course Road Appeal Point 126



VP2: View from Whalers Rock

33 Golf Course Road (Appeal Point 126)



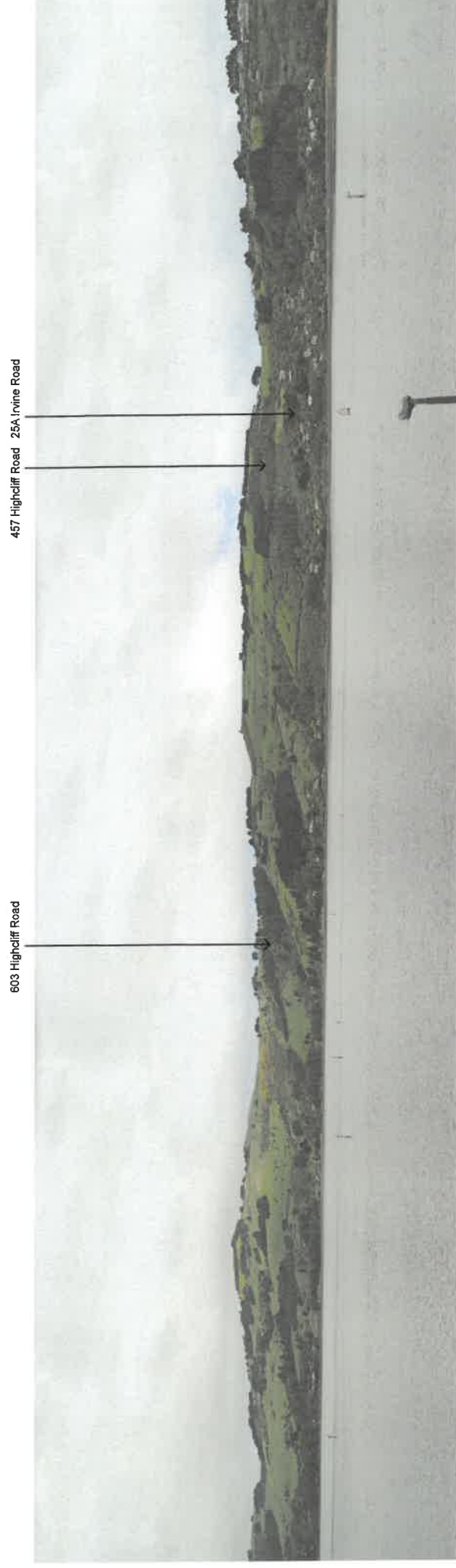
VP3: View from Harington Point Road

33 Golf Course Road (Appeal Point 364)



VP4: View from Waipuna Bay

33 Golf Course Road (Appeal Point 364)



VP5: View from Ravensbourne



VP6: View from Highcliff Road

457 Highcliff Road 25A Irvine Road

603 Highcliff Road

457 Highcliff Road



VP7: View from 650 High Cliff Road

603 High Cliff Road



VP8: View from Ravensbourne Road

603 High Cliff Road

48 Raynbird Street



VP9: View from Raynbird Street

48 Raynbird Street

48 Raynbird Street



VP10: View from Castlewood Road

48 Raynbird Street

48 Raynbird Street



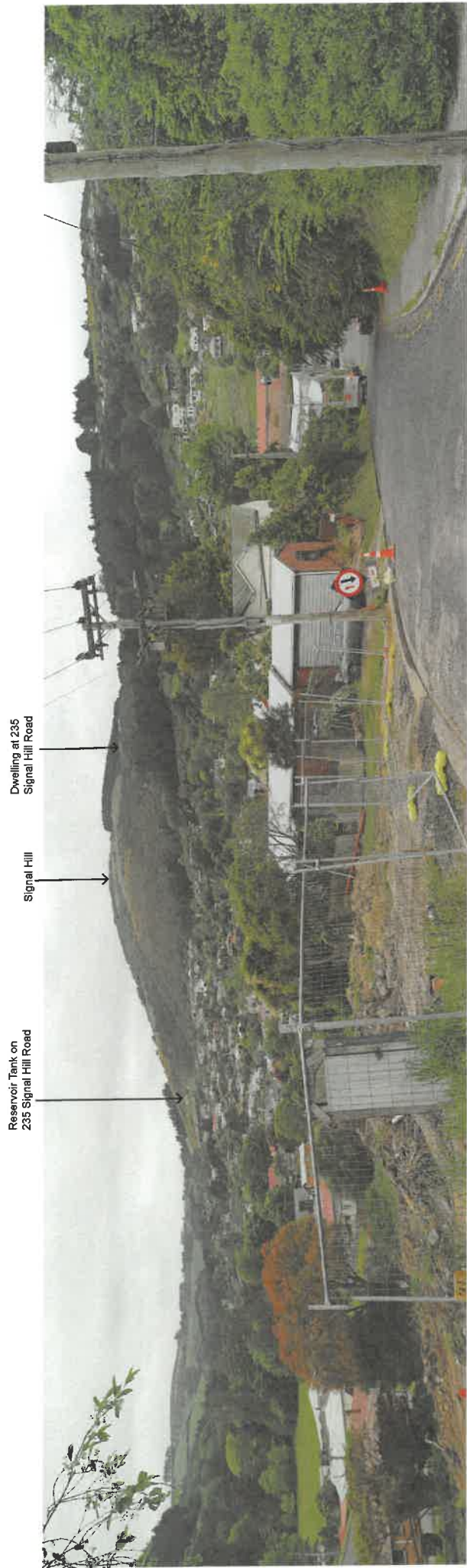
VP11: View from Fern Road

48 Raynbird Street
235 Signal Hill Road



VP12: View from Signal Hill Road

231,233 & 235 Signal Hill Road



VP13: View from Watts Road

231,233 & 235 Signal Hill Road

235 Signal Hill Road



VP14: View from Norwood Street (south)

231,233 & 235 Signal Hill Road

235 Signal Hill Road

Water Reservoir



VP15: View from Norwood Street (north)

231, 233 & 235 Signal Hill Road

43 Watts Road



VP16: View from Baldwin Street

43 Watt Road

43 Watts Road



VP17: View from Paris Street

43 Watt Road

Main Trunk Railway Line

Doctors Point Road



VP18: View from Thornicroft Road

135 – 145 Doctors Point Road

135 -145 Doctors Point



VP19: View from Doctors Point

135 – 145 Doctors Point Road

135 -145 Doctors Point



VP20: View from SH1

135 – 145 Doctors Point Road

About Boffa Miskell

Boffa Miskell is a leading New Zealand professional services consultancy with offices in Auckland, Hamilton, Tauranga, Wellington, Christchurch, Dunedin and Queenstown. We work with a wide range of local and international private and public sector clients in the areas of planning, urban design, landscape architecture, landscape planning, ecology, biosecurity, cultural heritage, graphics and mapping. Over the past four decades we have built a reputation for professionalism, innovation and excellence. During this time we have been associated with a significant number of projects that have shaped New Zealand's environment.

www.boffamiskell.co.nz					
Auckland	Hamilton	Tauranga	Wellington	Christchurch	Queenstown
+64 9 358 2526	+64 7 960 0006	+65 7 571 5511	+64 4 385 9315	+64 3 366 8891	+64 3 441 1670
					Dunedin
					+64 3 470 0460