
Golden Bay Outstanding Natural Features and Landscapes
Draft Section 32 Evaluation Report

Table of Contents

1.0	Introduction and Planning Context	2
1.1	Purpose and Structure of the Report	2
1.2	Statutory Context	3
	1.2.1 Resource Management Plan 1991	3
	1.2.2 New Zealand Coastal Policy Statement 2010	4
1.3	A Brief History of the Plan Change Process	5
2.0	The Resource Management Issue	6
2.1	Issue Identification	6
2.2	Landscapes and Outstanding Natural Features and Landscapes	6
3.0	Evaluation of Objectives	7
3.1	Existing Objective 9.1.2	7
4.0	Evaluation of Alternative Options	9
4.1	The Alternative Options	9
4.2	Costs and Benefits of the Alternative Options	9
	4.2.1 Mapping the Outstanding Natural Features and Landscapes	9
	4.2.2 Managing Subdivision, Land Use and Development	14
4.3	Risks of Acting or Not Acting	18
5.0	Evaluation of the Draft Plan Change Text	19
5.1	Outline of the Draft Plan Change and Maps	19
5.2	Evaluation of Appropriateness – Draft Objective	20
5.3	Evaluation of Appropriateness – Draft Provisions	21
5.4	The Most Appropriate Option	25
6.0	Conclusion	25
7.0	Appendices	26
7.1	Appendix 1 – Evidential Basis and Locational Advice	26
7.2	Appendix 2 – Assessment of Risk to Landscape Characteristics from Subdivision and Land Use and Development Activities	35

1.0 Introduction

1.1 Purpose and Structure of the Report

Section 32 of the Resource Management Act 1991 (RMA) requires Council to consider the alternative options when deciding on a course of action. This process of consideration must assess the costs and benefits, effectiveness and efficiency, and overall appropriateness of any objective, policy, rule or method prepared under the RMA. The Council is required to prepare a section 32 evaluation report summarising these considerations before publically notifying any proposed Plan or Plan Change.

The purpose of this section 32 evaluation report is to fulfil the requirements of section 32 of the RMA.

There are seven broad steps taken to assess these alternative options:

1. Identify the resource management issue.
2. Evaluate the extent to which any objective is the most appropriate way to achieve the purpose of the RMA.
3. Identify alternative policies and methods of achieving the objective.
4. Asses the effectiveness of alternative policies and methods in achieving the objective.
5. Assess the benefits and costs of the proposed and alternative policies, rules and other methods.
6. Examine the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules and other methods.
7. Decide which methods are the most appropriate given their likely effectiveness, and costs and benefits.

1.2 Statutory Context

1.2.1 Resource Management Act 1991

Section 5 of the Resource Management Act 1991 promotes the sustainable management of natural and physical resources:

- 5 Purpose**
- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.
 - (2) In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—
 - (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
 - (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
 - (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Section 6 of the Resource Management Act 1991 requires all persons exercising functions and powers under it to fully recognise and provide for some matters of national importance. The relevant matters of national importance are sections 6(a) and 6(b):

- 6 Matters of national importance**
- In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:
- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:
 - (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:

Section 67(3)(b) and 75(3)(b) require regional and district plans respectively to give effect to certain national and regional planning policy documents. Tasman District Council is bound by both sections, being a unitary authority and thus acting as both a regional council and a territorial authority.

- 67 Contents of regional plans**
- a) A regional plan must give effect to—
 - (a) any national policy statement; and
 - (b) any New Zealand coastal policy statement; and
 - (c) any regional policy statement.

75 Contents of district plans

- (1) A district plan must give effect to—
- (a) any national policy statement; and
 - (b) any New Zealand coastal policy statement; and
 - (c) any regional policy statement.

1.2.2 New Zealand Coastal Policy Statement 2010

The New Zealand Coastal Policy Statement 2010 (NZCPS) is a national policy document that states policy directed at achieving the purpose of the RMA in the specific context of New Zealand's coastal environment.

Objective 2 of the NZCPS aims to protect the natural character of the coastal environment, including coastal natural features and landscapes:

Objective 2

To Preserve the natural character of the coastal environment and protect natural features and landscape values through:

- recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution;
- identifying those areas where various forms of subdivision, use and development would be inappropriate and protecting them from such activities; and
- encouraging restoration of the coastal environment.

Policy 13(1)(a) of the NZCPS refers to the natural character of outstanding natural features and landscapes in the coastal environment, requiring their protection:

Policy 13

- (1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:
- (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and

Policy 15(a) of the NZCPS directly refers to outstanding natural features and landscapes in the coastal environment, requiring their protection:

Policy 15

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use and development:

- (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment;

1.3 A Brief History of the Plan Change Process

Tasman District's Golden Bay and Northwest Coast sub-region contains several dispersed coastal settlements nestled within and surrounded significant landscapes. This sub-region stretches from Kahurangi Point on the Northwest Coast to Separation Point on the Eastern coast of Golden Bay.

Section 6(b) of the RMA requires Council to protect identified "outstanding natural features and landscapes from inappropriate subdivision, use and development." The Tasman Resource Management Plan (the TRMP or the Plan) was originally notified in 1996 and proposed a number of Landscape Priority Areas (LPAs). These LPAs were a first response towards both identifying and protecting outstanding natural features and landscapes. In response to public submissions, Variation 1 removed all but two of these areas (only Takaka Hill and St Arnaud remained). The Friends of Nelson Haven and Tasman Bay (FNHTB) appealed the decision to the Environment Court in 2001. The appeals were resolved in June 2008 when Council and FNHTB signed a Memorandum of Understanding to:

1. Identify outstanding natural features and landscapes (ONFLs) in Golden Bay and the Northwest Coast, taking into account existing information; and
2. Review the TRMP's rules dealing with subdivision, buildings, earthworks, vegetation removal and forestry; and
3. Undertake a Plan Change to incorporate a strategy to protect ONFLs from inappropriate subdivision, use and development.

Work commenced on the Golden Bay Landscapes Project in late 2007. This involved several investigations and engagement with community stakeholders. Following a pause between 2008 and 2010, a Large Working Group (LWG) was established in December 2010 which met three times during 2011 and 2012. The key interest groups and stakeholders involved were the Ward Councillors, the Golden Bay Community Board, FNHTB and Friends of Golden Bay, Federated Farmers, the Department of Conservation, Royal Forest and Bird, local farmers, and other business groups such as mining, quarrying, tourism, and marine farming and fishing.

The Small Working Group (SWG) was subsequently formed, consisting of eight community representatives drawn from the Large Working Group. Their purpose was to assess Golden Bay's landscapes and identify outstanding natural features (ONFs) and outstanding natural landscapes (ONLs), while also representing interest groups and stakeholders within their community. The SWG then met over 20 times between 2012 and 2015 and published their recommendations in a report which was presented to Council in April 2015. This section 32 evaluation report explores the policy options available to Council following the SWG's report. The associated Draft Plan Change also stems from the locational findings of the SWG's report.

2.0 The Resource Management Issue

2.1 Issue Identification

The resource management issue concerning the draft section 32 evaluation report and the Draft Plan Change is the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.

This issue is clearly identified in section 6(b) of the RMA as a matter of national importance. The full extent of the issue has been explored through: commissioning technical landscape architect reports, conducting surveys with the general public and special interest groups, and engaging with discrete community representative groups.

2.2 Landscapes and Outstanding Natural Features and Landscapes

The Issue

Inappropriate subdivision, use and development risks damaging outstanding natural features and landscapes. The landscape characteristics of these features and landscapes need to be protected for the present and future enjoyment and use of people visiting, living in or working in Golden Bay.

Background to the Issue

Golden Bay has several landscape areas, some of which can be considered outstanding and natural. These include the Parapara Ranges, Farewell Spit, the coastal bay and its several estuaries, and the Northwest Coast. Each of these locations has landscape characteristics that make up the way they are perceived and enjoyed as landscapes. These characteristics include but are not limited to natural factors, visual appearance, and local values and knowledge tied to each location. However, such landscape characteristics are difficult to empirically measure, and features and landscapes are very difficult to define and delineate.

Golden Bay's landscapes are home to both historical and prominent land uses, such as mining and quarrying, fishing and aquaculture, farming and forestry, tourism and now rural lifestyle living. All of these activities occur within the wider landscapes, and some of them rely heavily on the health and wellbeing of those landscapes, particularly tourism and rural lifestyle living. Indeed, some of these activities are considered an integral part of the landscape, notably the many farms operating in Golden Bay.

Care and wide ranging consideration needs to be taken to define ONFs and ONLs, to assess the risks to their landscape characteristics from inappropriate activities, to clarify what those inappropriate activities are and where, and to reasonably manage those activities.

3.0 Evaluation of Objectives

The section 32 evaluation report requires an evaluation of how appropriate any issue-relevant objective is in achieving the purpose of the RMA. The purpose of the RMA is set out in section 5 which can be viewed in section 1.2.1 of this report.

3.1 Existing Objective 9.1.2

There is only one objective in Chapter 9 of the TRMP that currently deals with ONFLs directly. Chapter 9 is the TRMP's landscape's chapter and deals broadly with matters such as ONFLs, ridgelines, rural landscapes and public viewpoints.

9.1.2 Objective

Protection of the District's outstanding landscapes and features from the adverse effects of subdivision, use and development of land and management of other land, especially in the rural area and along the coast to mitigate adverse visual effects.

There are three broad criteria used to assess the appropriateness of this objective in achieving the purpose of the RMA: how effectively the objective deals with the resource management issue, the purpose and provisions of the RMA, and the provisions of the NZCPS.

1 Relation to the Resource Management Issue

The objective does address the resource management issue. It specifically addresses the District's ONFLs and seeks their protection from both particular or inappropriate activities and their subsequent adverse effects. However, it also addresses visual effects, which risks being construed as visual amenity. This overlaps with Chapter 5 of the TRMP which already clearly addresses visual amenity issues.

2 Relation to the Purpose of the RMA

The purpose of the RMA requires Council to "[manage] the use, development, and protection of natural and physical resources in a way, or rate, which enables people and communities to provide for their social, economic and cultural well-being..."

The protection of the District's ONFLs from inappropriate activities ensures that such features and landscapes can continue contributing to the social, economic and cultural well-being of Golden Bay's communities and Tasman District's wider economy.

2-1 Social and Cultural Wellbeing

These features and landscapes are highly valued by their surrounding communities through a sense of shared local history and cultural (including iwi) knowledge and associations. They also contribute to Golden Bay's local economy through the tourism industry and the working, productive nature of many landscapes.

2-2 Economic Wellbeing

However, much of Golden Bay's economy is dependent on natural resources and the primary industries. The definition of "inappropriate subdivision, use and development" must be clear and sensitive to Golden Bay's economic situation. The objective gives special reference to the rural working landscapes and the productive activities of the coastal environment. The wider concerns are duplicated within the TRMP in Chapters 7, 21, 22 and 27 which span terrestrial land and coastal land.

2-3 Other Matters in the RMA

The objective indirectly addresses several other matters of national importance in the RMA. In protecting ONFLs, natural character of the coastal environment and other water-based land is protected to a degree (section 6(a)), areas of significant indigenous vegetation and fauna are protected to a degree (section 6(c)), and Maori historical and cultural associations with certain locations are protected to a degree (section 6(e)). These matters are addressed as a result of managing landscape areas with high quality coastal and natural environments, and cultural associations.

3 Relation to the NZCPS

The objective makes special reference to protecting ONFLs along the coast, a step towards giving effect to Policy 15 of the NZCPS. Policy 15(a) of the NZCPS is specifically catered for, by clear reference to ONFLs rather than coastal landscapes in general.

4 Appropriateness

Overall, Objective 9.1.2 is an appropriate objective for achieving the purpose of the RMA but it is not the most appropriate objective. It addresses the resource management issue, the purpose of the RMA, and the provisions of the NZCPS. There is also some overlap with non-ONFL features and landscapes, particularly for rural and coastal environments, and visual amenity and effects. These are dealt with in other chapters and sections of the TRMP.

However, Objective 9.1.2 does not relate directly to the characteristics of the outstanding natural features and landscapes that need to be protected, and it is not enough to say that "protection of... from the adverse effects of subdivision, use and development..." is the objective. Another objective needs to be drafted to better focus on the outcome desired in terms of the definable landscape characteristics of features and landscapes themselves.

4.0 Evaluation of Alternative Options

The section 32 evaluation report requires an evaluation of reasonably practicable options for achieving the objective identified earlier.

4.1 The Alternative Options

There are eight options proposed under two topics; mapping the outstanding features and landscapes, and managing subdivision, land use and development. The former will produce ONF and ONL locations and overlays for planning maps, and the latter will produce provisions for the TRMP and non-regulatory actions or methods.

- (1) Mapping the outstanding natural features and landscapes
 - (a) **Option 1:** Status quo
 - (b) **Option 2:** Adopt the ONFL overlay recommendations of the SWG July 2015 report
 - (c) **Option 3:** Adopt the ONFL overlay recommendations of previous landscape architects
 - (d) **Option 4:** Commission a new investigation into Golden Bay's ONFL's

- (2) Managing subdivision, land use and development.
 - (a) **Option 1:** Status quo
 - (b) **Option 2:** Propose strictly ONFL-related amendments
 - (c) **Option 3:** Propose general landscape amendments and clarify landscape terminology
 - (d) **Option 4:** Propose voluntary non-regulatory methods

4.2 Costs and Benefits of the Alternative Options

4.2.1 Mapping the Outstanding Natural Features and Landscapes

The following four options concern mapping out individual ONFs and ONLs, delineating their boundaries:

Option 1: Status quo and LPAs

This option involves making no changes of any form. No TRMP text or map amendments are proposed, and protection relies on existing rules and LPAs.

Option 2: Adopt the ONFL overlay recommendations of the SWG July 2015 report

This option involves adopting the ONF and ONL overlay recommendations of the SWG July 2015 report. The recommendations come from of eight community representatives who have assessed Golden Bay locations and landscapes from their own perspectives and have come to a consensus.

Option 3: Adopt the ONFL overlay recommendations of previous landscape architects

This option involves adopting the ONF and ONL overlay recommendations of previous reports done by landscape architects. These include the Frank Boffa coastal landscape assessment of 2005, and the Andrew Craig landscape assessment of 2012.

Option 4: Commission a new investigation into Golden Bay's ONFL's

This options involves commissioning another landscape report for Golden Bay's ONFLs, and essentially rejecting the recommendations of both the SWG and previous landscape reports.

Table of Costs and Benefits of Alternative Options for Topic 2

Alternative Option	Benefits	Costs
Option 1: Status quo	<p><u>Environmental</u> Existing landscape protection from LPAs covers only a portion of the Takaka Hill.</p> <p><u>Social</u> Existing and long-standing land use activities are able to continue in those working landscapes, without additional regulatory costs.</p> <p><u>Cultural</u> Cultural land use activities are able to continue in those working landscapes, without additional regulatory costs.</p> <p><u>Economic</u> Extractive and natural resources-based activities are able to expand and continue operations without additional costs from landscape-related regulations.</p>	<p><u>Environmental</u> Existing landscape protection from LPAs is inadequate and does not actually cover any landscape units. ONFs and ONLs are not identified.</p> <p><u>Social</u> Locations of importance to local communities are not adequately protected by LPAs.</p> <p><u>Cultural</u> Locations of importance to iwi are not adequately protected by LPAs.</p> <p><u>Economic</u> Landscapes valuable to tourism and other local industries are not protected by LPAs.</p>

Recommendation	This option is not recommended as it does not adequately resolve the resource management issue. Landscapes deemed worthy of ONF and ONL status by both landscape architects and communities are neither identified nor protected.	
<p>Option 2: Adopt the ONFL overlay recommendations of the SWG July 2015 report</p>	<p><u>Environmental</u> Locations and landscapes deemed ONFs and ONLs by the community-led group are and protected.</p> <p><u>Social</u> The community-led process is both validated and further supported by Council. Diverse considerations and perspectives have contributed to the decisions.</p> <p><u>Cultural</u> Potential areas of importance to iwi are identified. The community-led process acknowledged that direct consultation with iwi is now required.</p> <p><u>Economic</u> Communities, industries and other parties benefit from the continued protection of ONFLs. These can include tourism operators, and many landowners and farmers.</p>	<p><u>Environmental</u> There are some locations where the SWG did not reach consensus and so are not deemed ONFs or ONLs but are still valuable.</p> <p><u>Social</u> Individual landowners and other parties have not been consulted directly during this process so far, so their views have not been taken into consideration at this stage.</p> <p><u>Cultural</u> Locations of importance to iwi were not adequately addressed within the community-led work. There needs to be early and direct consultation with iwi.</p> <p><u>Economic</u> Potentially heavier regulations for landscape protection may impose greater financial costs on those parties operating in affected areas. These can include some farmers, landowners and businesses.</p>
Recommendation	This option is fully recommended as it substantially identifies those areas and locations within Golden Bay which can be deemed ONFs and ONLs. However, it does not adequately assess iwi associations and values and also includes several unresolved locations. This would be a step towards resolving the resource management issue.	
<p>Option 3: Adopt the ONFL overlay recommendations of</p>	<p><u>Environmental</u> Locations and landscapes deemed ONFs and ONLs by the landscape assessments are protected.</p> <p><u>Social</u></p>	<p><u>Environmental</u> There are no environmental costs.</p> <p><u>Social</u> There will be damage to the good will and relationships developed</p>

previous landscape architects	<p>There are some social benefits. The previous reports have touched on different perspectives and the values of local communities, but not substantially.</p> <p><u>Cultural</u> There are no cultural benefits. Iwi perspectives and values were not considered, and locations of importance were not identified.</p> <p><u>Economic</u> Communities, industries and other parties benefit from the continued protection of ONFLs. These can include tourism operators, and many landowners and farmers.</p>	<p>over the years by the community-led process if Council does not adequately consider their work.</p> <p><u>Cultural</u> Locations of importance to iwi are not adequately assessed within the previous landscape assessments.</p> <p><u>Economic</u> There are no economic costs as the landscape assessments are already completed. Potentially heavier regulations for landscape protection may impose greater financial costs on those parties operating in affected areas. These can include some farmers, landowners and businesses.</p>
Recommendation	<p>This option is partially recommended as it identifies those areas and locations within Golden bay which can be deemed ONFs and ONLs. However, it does not adequately assess iwi associations and values. This would be a step towards resolving the resource management issue.</p>	
<p>Option 4: Commission a new investigation into Golden Bay's ONFL's</p>	<p><u>Environmental</u> Locations and landscapes deemed ONFs and ONLs by the landscape assessment are protected.</p> <p><u>Social</u> There can be some social benefits. The landscape assessment can touch on different perspectives and values of local communities, but not substantially.</p> <p><u>Cultural</u> There can be some cultural benefits. Iwi perspectives and values may be considered, and</p>	<p><u>Environmental</u> There are no environmental costs.</p> <p><u>Social</u> There will be damage to the good will and relationships developed over the years by the community-led process if Council ignores their work. There is also the risk that another commissioned investigation will not consider perspectives as widely as the community-led process did.</p> <p><u>Cultural</u></p>

	<p>some locations of importance to iwi can be identified.</p> <p><u>Economic</u> Communities, industries and other parties benefit from the continued protection of ONFLs. These can include tourism operators, and many landowners and farmers.</p>	<p>Locations of importance to iwi may not be adequately assessed by any single landscape architect.</p> <p><u>Economic</u> A full investigation will require a technical assessment of Golden Bay's landscapes as well as community surveys. This will cost large amounts of time and money.</p>
Recommendation	<p>This option is not recommended as it will reattempt to identify those areas and locations within Golden bay which can be deemed ONFs and ONLs. However, this work has already been done by multiple parties, including the Small Group and several previous landscape architects. This would be an unnecessary step towards resolving the resource management issue.</p>	
Summary Recommendation	<p>A combination of options 2 and 3 are recommended. Potential ONFLs have already been proposed by the Small Group, and previous landscape architects have already made landscape assessments of Golden Bay. The recommendations can be consolidated. There are still gaps, however, around locations of importance to iwi and select areas where the SWG could not reach consensus.</p>	

Council's stance on ONFL locations for the Draft Plan Change

Council has decided to accept the recommendations of the SWG in full, for those locations where consensus was reached. These are 20 locations in total; excluded locations, ONFs and ONLs. Council has also decided to exclude the six locations that the SWG could not reach a consensus on, the No-Consensus General and No-Consensus Iwi Association locations.

The SWG recommendations were significantly consistent with existing landscape and natural character evidence. Refer to Table 2.3 of Appendix 1 for a list of each assessed location and the assessments of both the SWG and past landscape and natural character reports.

4.2.2 Managing Subdivision, Land Use and Development

The following four options concern managing various activities within the delineated ONFLs:

Option 1: Status quo

This option involves making no changes of any form. No TRMP text or map amendments are proposed, and protection relies on existing rules and LPAs.

Option 2: Propose strictly ONFL-related amendments

This option involves proposing TRMP text and map amendments for strictly ONFL-related provisions. The amendments can include new objectives, policies and rules, and the proposed ONFL overlays in the SWG July 2015 report. However, general landscape provisions and maps are not amended.

Option 3: Propose general landscape amendments and clarify landscape terminology

This option involves proposing TRMP text and map amendments for both ONFLs and general landscape matters. The amendments can include provisions for rural and coastal character, natural character and visual amenity, all topics which are directly related to landscape but not necessarily directly related to ONFLs.

Option 4: Propose voluntary non-regulatory methods

This option involves proposing non-regulatory methods for either only ONFLs or also general landscapes. The methods can include producing a voluntary technical design guide for new buildings and landscaping, and providing rates relief for landowners who take particular care of their land and landscaping.

Table of Costs and Benefits of Alternative Options for Topic 2

Alternative Option	Benefits	Costs
Option 1: Status quo	<u>Environmental</u> Existing landscape protection from LPAs covers only a portion of the Takaka Hill and select activities. <u>Social</u>	<u>Environmental</u> Existing landscape protection from LPAs is inadequate and does not actually cover any landscape units. ONFs and ONLs are not identified. <u>Social</u>

	<p>Existing and long-standing land use activities are able to continue in those working landscapes, without additional regulatory costs.</p> <p><u>Cultural</u> Cultural land use activities are able to continue in those working landscapes, without additional regulatory costs.</p> <p><u>Economic</u> Extractive and natural resources-based activities are able to expand and continue operations without additional costs from landscape-related regulations.</p>	<p>Locations of importance to local communities are not adequately protected by LPAs.</p> <p><u>Cultural</u> Locations of importance to iwi are not adequately protected by LPAs.</p> <p><u>Economic</u> Landscapes valuable to tourism and other local industries are not protected by LPAs.</p>
<p>Recommendation</p>	<p>This option is not recommended as it does not adequately resolve the resource management issue. Landscapes deemed worthy of ONF and ONL status by both landscape architects and communities are neither identified nor protected.</p>	
<p>Option 2: Propose strictly ONFL-related amendments</p>	<p><u>Environmental</u> The landscape characteristics of ONFs and ONLs are protected.</p> <p><u>Social</u> Landscape characteristics related to social values and communities, such as historical knowledge, are protected. Protected locations are likely to have been identified by members of the Golden Bay community.</p> <p><u>Cultural</u> Landscape characteristics related to iwi values and perspectives, such as historical and cultural associations, are protected.</p> <p><u>Economic</u> Communities, industries and other parties benefit from the continued</p>	<p><u>Environmental</u> There are no environmental costs.</p> <p><u>Social</u> Landscape areas and locations of importance to communities that are not deemed ONFs or ONLs are not protected.</p> <p><u>Cultural</u> Landscape areas and locations of importance to iwi that are not deemed ONFs or ONLs are not protected. There is a substantial risk of iwi viewing Council as operating in a heavy-handed manner, affecting the lands returned recently by the Treaty Settlement process.</p> <p><u>Economic</u></p>

	protection of ONFLs. These can include tourism operators, and many landowners and farmers.	Potentially heavier regulations for landscape protection may impose greater financial costs on those parties operating in affected areas. These can include some farmers, landowners and businesses.
Recommendation	This option is recommended as it adequately resolves the resource management issue. Landscapes deemed worthy of ONF and ONL status by both landscape architects and communities are both identified and protected.	
Option 3: Propose general landscape amendments and clarify landscape terminology	<p><u>Environmental</u></p> <p>The landscape characteristics of both ONFLs and other landscape areas and locations are protected. Clarifying landscape terminology will make landscape protection both easier and more effective.</p> <p><u>Social</u></p> <p>Landscape areas and locations of importance to communities are protected, both ONFLs and those that don't reach that threshold yet are still regarded as valuable.</p> <p><u>Cultural</u></p> <p>Landscape areas and locations of importance to iwi are protected, both ONFLs and those that don't reach that threshold yet are still regarded as valuable.</p> <p><u>Economic</u></p> <p>Communities, industries and other parties benefit from the continued protection of ONFLs. These can include tourism operators, and many landowners and farmers.</p>	<p><u>Environmental</u></p> <p>There are no environmental costs.</p> <p><u>Social</u></p> <p>There is a risk of Council being seen as operating outside of the scope it promised the Golden Bay communities, which was limited to ONFLs.</p> <p><u>Cultural</u></p> <p>There is a substantial risk of iwi viewing Council as operating in a heavy-handed manner, affecting the lands returned recently by the Treaty Settlement process.</p> <p><u>Economic</u></p> <p>Potentially heavier regulations for landscape protection may impose greater financial costs on those parties operating in affected areas. These can include some farmers, landowners and businesses. The scope of potential economic costs is much wider if landscapes in general are protected rather than just ONFLs.</p>
Recommendation	This option is partially recommended as it adequately resolves the resource management issue but has a wider scope which risks being received more negatively than is necessary to resolve the issue at hand.	

<p>Option 4: Propose voluntary non-regulatory methods</p>	<p><u>Environmental</u> Those landscapes and locations can be protected and enhanced by community-driven efforts.</p> <p><u>Social</u> Communities, industries and other parties are able to actively work with Council to produce favourable outcomes. Both design guides and funding for landscaping activities provide these opportunities.</p> <p><u>Cultural</u> Iwi can be engaged through these voluntary methods, including design guides and public funding for landscaping activities. Direct interaction with iwi encourages greater expression of their values and perspectives.</p> <p><u>Economic</u> Communities, industries and other parties benefit from reduce forced compliance costs.</p>	<p><u>Environmental</u> Those landscapes and locations also risk not being either protected or enhanced if the community does not take action.</p> <p><u>Social</u> Communities, industries and other parties may not wish to work with Council to protect landscapes.</p> <p><u>Cultural</u> Iwi may not wish to engage with Council to protect landscapes.</p> <p><u>Economic</u> Council must provide funding for the voluntary methods. Design guides will require a landscape or design expert to be commissioned and rates relief or public funding will require a funding pool to be set up.</p>
<p>Recommendation</p>	<p>This option is partially recommended as it expands Council’s and the wider community’s options for landscape protection. However, such methods are ultimately voluntary can cannot be relied on. This would be a step towards resolving the resource management issue.</p>	
<p>Summary Recommendation</p>	<p>A combination of options 2, 3 and 4 are recommended. Proposing strict-ONFL related provisions and some non-regulatory methods can ensure that ONFs and ONLs are protected and potentially enhanced over time. Clarifying landscape terminology throughout the plan can improve the ease and effectiveness of implementing landscape protection. This will be a major step towards resolving the resource management issue.</p>	

4.3 Risks of Acting or Not Acting

The risks of not acting are high. The Evidential Basis in Appendix 1 summarises the evidence for the identification or rejection of locations as ONFs or ONLs. The evidence covers an array of landscape characteristics and natural values that contribute to an overall recommendation. However, the identified landscape characteristics are at risk of damage or degradation. The Risk Assessment in Appendix 2 identified that the main risks of damage or degradation to landscape characteristics of outstanding natural features or landscapes were from man-made modifications; modifications from earthworks, vegetation removal; changes to buildings, structures and tracks; and large-scale activities such as plantation forestry and quarrying.

If no action is taken to clearly identify the landscape characteristics in need of protection and then improve protection of those landscape characteristics, then we risk our outstanding natural features and landscapes becoming damaged or degraded to an extent where there they are no longer outstanding or natural. It is necessary to act on the risk from the status quo situation given that the protection of outstanding natural features and landscapes is a matter of national importance.

5.0 Evaluation of the Draft Plan Change Text and Maps

The section 32 evaluation report requires an evaluation of whether the proposed provisions in the Plan Change are the most appropriate for addressing the resource management issue or not. The recommendations of Section 5.2 follow directly on from those of Section 4.2.2.

5.1 Outline of the Draft Plan Change

The Draft Plan Change is centred around identifying the landscape characteristics of locations deemed outstanding natural features or landscapes and then managing man-made change to those locations across three tiers of man-made activities (refer to Section 4.3 and Appendices 1 and 2 for background information):

- 1) **Individual land surface component changes**, such as a single earthworks or construction event.
- 2) **Aggregate land use activities on a single site**, including multiple individual land surface component changes over a period of time, such as dairy farming or plantation forestry.
- 3) **Change over time in aggregate land use activities**, such as changes in economic climate and cumulative subdivision events.

Amendments proposed by draft plan change are split across six chapters, consistent with the structure of the TRMP and the overall approach of the draft plan change:

- 1) **Chapter 9: Landscape**
Contains the draft issue, objective, policies, methods and principal reasons for the overall approach to ONFL protection. Enables activity tiers 1, 2 and 3 to be managed and for the existing activities to continue.
- 2) **Chapter 16: General Rules**
Contains the draft assessment criteria for subdivision consents in ONFLs. Requires consent applications for subdivisions in ONFLs to include landscape assessments, particularly for the cumulative effects of subdivisions in the area. Enables management of activity tiers 2 and 3.
- 3) **Chapter 18: Special Area Rules**
Contains the draft rules for new earthworks, new vegetation removal, and construction or alteration of buildings, structures and tracks in ONFLs. Enables management of activity tiers 1 and 2.

4) **Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications**

Contains additional information requirements for consent applications in ONFLs. Enables management of activity tiers 1, 2 and 3.

5) **Chapter 25: Coastal Marine Area Rules**

Contains the draft rules for new disturbance, new vegetation removal, and construction or alteration of coastal structures or occupations in ONFLs. Enables management of activity tiers 1 and 2.

6) **Chapter 26: Information Required with Coastal Permit Applications**

Contains additional information requirements for permit applications in ONFLs. Enables management of activity tiers 1, 2 and 3.

5.2 Evaluation of Appropriateness – Draft Objective

There were two options of objectives for managing protecting outstanding natural features and landscapes from inappropriate subdivision, use and development:

Option 1: Existing Objective 9.1.2

9.1.2 Objective

Protection of the District's outstanding landscapes and features from the adverse effects of subdivision, use and development of land and management of other land, especially in the rural area and along the coast to mitigate adverse visual effects.

Option 2: Draft Objective 9.1.2

9.1.2 Objective

The landscape characteristics of the District's outstanding natural features and landscapes are protected or enhanced.

As discussed in Section 31, the existing Objective 9.1.2 is not the most appropriate way to achieve the purpose of the Act. The existing Objective 9.1.2 does not relate directly to the landscape characteristics of the outstanding natural features and landscapes that need to be protected and does not clearly state the outcome sought. In comparison, draft Objective 9.1.2 does relate directly to the landscape characteristics of the outstanding natural features and landscapes that need to be protected and clearly states the outcome sought, the protection or enhancement of those landscape characteristics.

5.3 Evaluation of Appropriateness – Draft Provisions

There were three options for managing change in ONFLs that were assessed and evaluated throughout the development Draft Plan Change:

Option 1: Status Quo

This option involves making no changes of any form. No TRMP text or map amendments are proposed, and protection relies on existing rules and LPAs.

Option 2: Develop a policy and rule framework for that can recognise existing activities and land surface components, and assess and manage new change to ONFLs, using activity status and assessment criteria as primary mechanisms

This option involves developing a policy and rule framework that a) recognises existing land use activities as a core part of many landscapes and enables them to continue through both permitted and controlled activity statuses, and b) recognises that new land use activities are the primary risk to landscape characteristics and requires their assessment through controlled and restricted discretionary activity statuses. The activity standards are primarily purposive and locational-based, meaning that activities in the coastal environment and near ONFLs are managed more strictly than those that are not. This approach is very dissimilar to most zones in that specific outcomes sought are not sought for every ONFL location.

Option 3: Develop a policy and rule framework that has prescriptive development controls for both new and existing activities, using activity standards and activity status as primary mechanisms

This option involves developing a policy and rule framework that adopts a prescriptive, one size fits all approach that a) sets out activity standards for subdivision, use and development activities that occur in ONFLs, and b) does not necessarily distinguish between existing and new activities. The activity standards are not necessarily purposive but they can be locational-based, meaning that activities in the coastal environment and near ONFLs are managed more strictly than those that are not. This approach is similar to that of most zones where specific outcomes are sought for every ONFL location.

Evaluation Table for Option 1 Benefits and Costs, and Effectiveness and Efficiency

Option 1: Status Quo				
	Environmental	Social	Cultural	Economic
Benefits	Existing landscape protection from LPAs covers the construction of new buildings, the expansion of existing buildings, removal of indigenous vegetation and plantation forestry.	Existing and long-standing land use activities are able to continue in those working landscapes, without additional regulatory costs.	Cultural land use activities are able to continue in those working landscapes, without additional regulatory costs.	Extractive and natural resources-based activities are able to expand and continue operations without additional costs from landscape-related regulations.
Costs	Existing landscape protection from LPAs covers only a few of the many activities identified as risks. The activity standards are not linked to the actual landscape characteristics in need of protection.	Locations of importance to local communities are not adequately protected and may be overlooked.	Locations of importance to iwi are not adequately protected and may be overlooked.	Landscapes valuable to tourism and other local industries are not adequately protected and may be overlooked.
Effectiveness	This option is not effective as it will not achieve the draft objective. It neither identifies the landscape characteristics in need of protection in ONFLs nor does it adequately respond to the risks identified for natural landscapes.			
Efficiency	This option is not efficient as it will not achieve the draft objective.			
Overall Advice	Option 1 is not an appropriate way of achieving the draft objective.			

Evaluation Table for Option 2 Costs and Benefits, and Effectiveness and Efficiency

Option 2: Develop a policy and rule framework for that can recognise existing activities and land surface components, and assess and manage new change to ONFLs, using activity status and assessment criteria as primary mechanisms				
	Environmental	Social	Cultural	Economic
Benefits	<p>The landscape characteristics for ONFLs are identified and protected, especially those characteristics that relate to natural processes such as the presence of native vegetation.</p> <p>New information requirements will enable better assessment and monitoring of new resource and subdivision consents applications.</p>	<p>Social landscape characteristics such as local history and shared values are identified and protected.</p> <p>Existing and long-standing land use activities are able to continue in those working landscapes.</p>	<p>Cultural landscape characteristics such as Iwi history and associations, and long-standing economic land uses such as farming and forestry are identified and protected.</p>	<p>Long-standing and existing economic activities such as farming, forestry and aquaculture are enabled to continue.</p> <p>Landscapes valuable to tourism and other local industries are protected for present and future enjoyment.</p>
Costs	<p>Because the draft provisions relate back to existing permitted activities, there is the risk that landscape characteristics may be damaged due to lenient existing provisions.</p> <p>There is also the risk that the cumulative effects of subdivision and consequential development may not be assessed or managed properly; assessment criteria and new information requirements may not be enough.</p>			<p>Some new economic activities will have higher barriers to being consented and establishing, as well as higher consenting costs and new requirements for landscape information.</p>
Effectiveness	<p>This option is an effective way of achieving the draft objective. It identifies the landscape characteristics in need of protection in ONFLs and responds to the identified risks by addressing disturbance, and building, structure and vegetation modification on land and in the coastal environment.</p>			
Efficiency	<p>This option is an efficient way of achieving the draft objective. It does not unreasonably increase consenting or regulatory costs of existing activities and also enables the assessment of new, potentially risky, activities on landscape grounds. Where consenting or regulatory costs are increased, landscape-related effects will be assessed and the risk of damage to landscape characteristics will be reduced.</p>			
Overall Advice	<p>Option 2 is an appropriate way of achieving the draft objective.</p>			

Evaluation Table for Option 3 Costs and Benefits, and Effectiveness and Efficiency

Option 3: Develop a policy and rule framework that has prescriptive development controls for both new and existing activities, using activity standards and activity status as primary mechanisms				
	Environmental	Social	Cultural	Economic
Benefits	The landscape characteristics for ONFLs can be protected by provisions that address each characteristic indirectly.	Social landscape characteristics such as local history and shared values can be identified and protected. Existing and long-standing land use activities may continue in those working landscapes.	Cultural landscape characteristics such as Iwi history and associations, and long-standing economic land uses such as farming and forestry can be identified and protected.	Consenting processes are made simpler for applicants as the rules drafted are clear and prescriptive.
Costs	Prescriptive rules and development controls are a blunt instrument that may not adequately protect all features and landscapes sufficiently.			Some new economic activities will have higher barriers to being consented and establishing due to more restrictive activity statuses being used.
Effectiveness	This option is not an effective way of achieving the draft objective. It does not necessarily identify the landscape characteristics in need of protection in ONFLs and but it can respond to the identified risks to those landscape characteristics. However, because there is no direct link between the quality in need of protection and the regulatory response, there is the risk of a mismatch and leaving certain characteristics vulnerable to damage or degradation.			
Efficiency	This option is an efficient way of achieving the draft objective. It does not unreasonably increase consenting or regulatory costs of existing activities.			
Overall Advice	Option 3 is not an appropriate way of achieving the draft objective.			

5.4 The Most Appropriate Option

Following the evaluation of the draft objective and draft provisions in Section 5.3, the most appropriate option has been identified as **Option 2**, developing a policy and rule framework for that can recognise existing activities and land surface components, and assess and manage new change to ONFLs, using activity status as a primary mechanism.

6.0 Conclusion

There are two conclusions for the Draft Plan Change:

- 1) **Identifying ONFL locations:** The most appropriate option for identifying ONFL locations is to adopt the ONFL overlay recommendations of the SWG July 2015 report, the majority of which is supported by existing landscape and natural character evidence.
- 2) **Protecting ONFL landscape characteristics:** The most appropriate option for protecting ONFL landscape characteristics is to adopt the Draft Plan Change, which both identifies the landscape characteristics ONFL locations and responds to the identified risks to those landscape characteristics from man-made modifications.

7.0 Appendices

7.1 Appendix 1 – Evidential Basis and Locational Advice

There are two parts to this report:

1. Case law overview
2. Technical advice collation and staff recommendations

1.0 Case Law Overview

There have been three recent cases before the courts that have strongly informed practice around identifying and protecting outstanding natural features and landscapes.

1.1 King Salmon (before the Supreme Court)

Environmental Defence Society Inc v The New Zealand King Salmon Co Ltd [2014] NZSC 38

Referred to as the King Salmon decision, the Supreme Court found that:

- Regional and district plans must “give effect to” the NZCPS 2010, which plainly means to “implement;”
- NZCPS 2010 Policies 13(1)(a) and 15(1)(a) require the Councils to “avoid” adverse effects on outstanding natural character and outstanding natural features and landscapes, which plainly means to “not allow” or “prevent the occurrence of;”
- The NZCPS 2010 is assumed to give effect to Part 2 of the RMA and Council should not refer back to Part 2 of the RMA unless the is not relevant, invalid or conflicting;
- Council should not attempt to make a “balanced judgement/interpretation” on the matter of outstanding natural features or landscapes in the coastal environment.

1.2 Man O’War (before the High Court)

Man O’War Station Ltd v Auckland Council [2015] NZHC 767

Referred to as the Man O’War decision, the High Court found that:

- The process for identifying and delineating ONFLs must occur separately from the process of developing policies and rules to protect them;
- There is no requirement to separate coastal landscapes from dry-land landscapes;
- Landscapes and features do not need to be outstanding and natural at a national scale to be worthy for protection. The protection of ONFLs is of national importance, not the protection of nationally important ONFLs.

1.3 Camel Point (before the Environment Court)

Clearwater Mussels Ltd v Marlborough District Council [2016] NZEnvC 21

Referred to as the Camel Point decision, the Environment Court found that:

- A feature within an ONL does not also need to be an ONF to have the same degree of protection. The feature needs only be part of an ONL

- Visual effects vary depending on the viewpoint on takes, and visual effects do not need to be significant at all viewpoints to be considered significant

1.4 References

Atkins, Helen and Dawson, Sarah. (N.D.) *The King Salmon Decision – a think piece for planners*. Retrieved from https://www.planning.org.nz/Attachment?Action=Download&Attachment_id=2620 (accessed 5 June 2016).

Beverley, Paul and Allen, David. (2014). *Implications of the New Zealand King Salmon Supreme Court decision*. Retrieved from <http://www.buddlefindlay.com/insights/implications-of-the-new-zealand-king-salmon-supreme-court-decision/> (accessed 5 June 2016).

Boffa Miskell Ltd. (2015). *Landscape: Debunking the ‘absolute’ protection myth*. Retrieved from <http://www.boffamiskell.co.nz/news-and-insights/article.php?v=landscape-debunking-the-absolute-protection-myth> (accessed 5 June 2016).

Clearwater Mussels Ltd v Marlborough District Council [2016] NZEnvC 21.

Environmental Defence Society Inc v The New Zealand King Salmon Co Ltd [2014] NZSC 38.

Man O’War Station Ltd v Auckland Council [2015] NZHC 767.

2.0 Technical advice collation

There are three sources of technical landscape advice which we have received over the past 11 years and three sources of natural character/value technical assessments which we have received over the past 23 years.

The primary technical landscape advice is from:

- Boffa Miskell (2005b)
- Liz Kidson (2006)
- Andrew Craig (2012)

The supplementary natural character/value technical assessments are from:

- DOC (1993)
- Victoria Froude (2012)
- Ian Lynn (2012)

Table 2.3 summarises the overall recommendations and findings made by each report and then states whether or not the findings of the Small Working Group are consistent with the

overall body of evidence. Bear in mind that not all of the locations (such as features or no-consensus areas) were distinguished separately within the reports. For example, Big River Estuary was identified separately in some reports but in other was deemed as within the Northwest Coast.

Consistency of the Small Working Group's recommendations with the overall evidence for Excluded, ONF and ONL locations is ranked from 1 to 4:

- 1 – Mostly consistent
- 2 – Partially consistent
- 3 – Partially inconsistent
- 4 – Mostly inconsistent

The staff recommendation for No-Consensus General and No-Consensus Iwi Association locations are ranked from 1 to 4:

- 1 – Recommend for inclusion
- 2 – Partially recommend for inclusion
- 3 – Partially recommended for exclusion
- 4 – Recommended for exclusion

2.1 Council's stance on ONFL locations for the Draft Plan Change

Council has decided to accept the recommendations of the SWG in full, for those locations where consensus was reached. These are 20 locations in total; excluded locations, ONFs and ONLs. Council has also decided to exclude the six locations that the SWG could not reach a consensus on, the No-Consensus General and No-Consensus Iwi Association locations.

The SWG recommendations were significantly consistent with existing landscape and natural character evidence. Refer to Table 2.3 for a list of each assessed location and the assessments of both the SWG and past landscape and natural character reports.

2.2 References

- Boffa Miskell Ltd. (2005a). *Tasman District Coast Landscape Character Assessment*. Richmond, Nelson, New Zealand: Tasman District Council.
- Boffa Miskell Ltd. (2005b). *Tasman District Coast Landscape Character Assessment – Background Report*. Richmond, Nelson, New Zealand: Tasman District Council.
- Craig, Andrew. (2012). *Golden Bay Outstanding Natural Landscapes and Features Study – Draft Version 2*. Richmond, Nelson, New Zealand: Tasman District Council.

Department of Conservation. (1993). *Northwest South Island National Park Investigation, Report of to the New Zealand Conservation Authority*. Nelson, New Zealand: Nelson/Marlborough Conservancy.

Froude, Victoria Ann and Richmond, Chris. (2012). *Tasman District Coastal Environment Inland Boundary and Natural Character Mapping: Methodology and Summary Results*. Richmond, Nelson, New Zealand: Pacific Eco-Logic Ltd.

Kidson, Liz. (2006). *Evidence of Elizabeth Jane Kidson on behalf of Friends of Nelson Haven ad Tasman Bay Incorporated*.

Lynn, Ian. (2012). *Land types of the Tasman District*. Lincoln, New Zealand: Landcare Research.

2.3 Table of technical advice received and staff recommendations

Location Type	Location	DOC (1993) <i>Supplementary</i>	Boffa Miskell (2005a and 2005b) <i>Primary</i>	Liz Kidson (2006) <i>Primary</i>	Andrew Craig (2012) <i>Primary</i>	Victoria Froude (2012) <i>Supplementary</i>	Ian Lynn (2012) <i>Supplementary</i>	Summary and Staff Recommendation
	Unit of Measurement	Natural characteristics, modification and DOC recommendation	Key landscape characteristics	Pigeon Bay Criteria	Pigeon Bay Criteria	Inland boundary and natural character	Land type number and name	Consistency with the SWG's report or staff locational recommendation
Excluded locations	Takaka Valley	N/A	Takaka Coast Northwest Coast Landscape/natural character – Significant	Pohara to Tata coast through to the Takaka hills are outstanding Most of interior N/A	Upper Takaka Valley Naturalness – moderate, some modification Landscape – high to outstanding Lower Takaka Valley Naturalness – low, modified Landscape – low, not outstanding	Coastal valley – Less than High Rest N/A	7 – Western lowland major river valley 9 – Golden Bay soft rock tertiary hills	1 Exclusion is mostly consistent with evidence
	Aorere Valley	N/A	Collingwood Coast and Parapara Coast Landscape/natural character – High	Whanganui inlet mountain catchment is outstanding Most of interior N/A	Upper Aorere Valley Naturalness – high, mostly unmodified Landscape – very high to outstanding Lower Aorere Valley Naturalness – low, modified Landscape – low, not outstanding	Coastal valley – Less than High Rest N/A	7 – Western lowland major river valley 9 – Golden Bay soft rock tertiary hills	1 Exclusion is mostly consistent with evidence
	Northwest Coast	N/A	Northwest Coast Landscape/natural character – High	Northwest coast is outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Anatori estuary – partially High and mostly Outstanding Rest partially High and mostly Less than High	1 – Western coastal tertiary soft rock	3 Exclusion is partially inconsistent with evidence
	Kahurangi National Park east of Kaihoka	Natural values – deemed worthy for inclusion in national park Modification – no separate comment Recommendation – include	Northwest Coast and Collingwood Coast Landscape/natural character – High	Whanganui inlet, coastline and coastal mountain catchment are outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Coastal land – partially High and partially Outstanding Rest N/A	1 – Western coastal tertiary soft rock 3 – Upper cretaceous coal measures	4 Exclusion is mostly inconsistent with evidence

Outstanding Natural Features (ONFs)	Aorere River, Gorge and Tributaries	N/A	N/A		Upper Aorere Valley Naturalness – high, mostly unmodified Landscape – very high to outstanding	N/A	5 – Old hard rock mountain 7 – Western lowland major river valley 9 – Golden Bay soft rock tertiary hills	1 Inclusion is mostly consistent with evidence
	Big River Estuary	N/A	Northwest Coast Landscape/natural character – High	Northwest coast is outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Estuary – Outstanding	1 – Western coastal tertiary soft rock 4 – Western granite	1 Inclusion is mostly consistent with evidence
	Farewell Spit	Natural values – protected as a nature reserve Modification - very little, unmodified Recommendation – exclude to further protect natural values	Farewell Spit Landscape/natural character – High	Farewell Spit and tidal flats are outstanding	Golden Bay/Farwell Spit Naturalness – high, mostly unmodified Landscape – very high to outstanding	Sand spit – High Tidal flats – Outstanding	2 – Barrier spit	1 Inclusion is mostly consistent with evidence
	The Grove	N/A	N/A	N/A	The Grove Naturalness – high, unmodified Landscape – very high to outstanding	N/A	7 – Western lowland major river valley	1 Inclusion is mostly consistent with evidence
	Hanson Winter	N/A	Takaka Coast Northwest Coast Landscape/natural character – Significant	N/A	Tarakohe Cliffs and Hanson Winter Naturalness – moderate, modified Landscape – very high to outstanding	Hanson Winter – Less than High	8 – Golden Bay coastal fringe	3 Inclusion is partially inconsistent with evidence
	Paynes Ford	N/A	N/A	N/A	Paynes Ford Naturalness – high, unmodified Landscape – very high to outstanding	N/A	7 – Western lowland major river valley	1 Inclusion is mostly consistent with evidence
	Tarakohe Cliffs	N/A	Takaka Coast Northwest Coast Landscape/natural character – Significant	Pohara to Tata coastline is outstanding	Tarakohe Cliffs and Hanson Winter Naturalness – moderate, modified Landscape – very high to outstanding	Cliffs – Less than High	9 – Golden Bay soft rock tertiary hills	2 Inclusion is partially consistent with evidence
	Te Waikoropupu Springs	N/A	N/A	N/A	Te Waikoropupu Springs Naturalness – high to moderate, modified Landscape – high to outstanding	N/A	7 – Western lowland major river valley	1 Inclusion is mostly consistent with evidence
	Wainui Bay Inlet	N/A	Wainui Coast Landscape/natural character – High	Wainui Bay inlet is outstanding	Wainui Inlet Naturalness – high, mostly unmodified	Bay – mostly High and partially Outstanding	9 – Golden Bay soft rock tertiary hills	1

					Landscape – very high to outstanding	Headland – High	10 – Coastal separation point	Inclusion is mostly consistent with evidence
	Whanganui Inlet	N/A	Northwest Coast Landscape/natural character – High	Whanganui inlet, coastline and coastal mountain catchment are outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Inlet and headlands – Outstanding	1 – Western coastal tertiary soft rock 3 – Upper cretaceous coal measures	1 Inclusion is mostly consistent with evidence
Outstanding Natural Landscapes (ONLs)	Abel Tasman	N/A	Abel Tasman Coast and Wainui Coast Landscape/natural character – High	Abel Tasman coast is outstanding Interior N/A	Abel Tasman Naturalness – high, mostly unmodified Landscape – very high to outstanding	Coastal land – partially High and partially Outstanding Rest N/A	10 – Coastal separation point 12 – Northern Mount Arthur marble	1 Inclusion is mostly consistent with evidence
	Parapara-Kahurangi Ranges	Natural values – deemed worthy for inclusion in national park Modification – no separate comment Recommendation – include	N/A	N/A	Parapara/Kahurangi Naturalness – high, mostly unmodified Landscape – very high to outstanding	N/A	4 – Western granite 5 – Old hard rock mountain 6 – Western inland valley floor 9 – Golden Bay soft rock tertiary hills	1 Inclusion is mostly consistent with evidence
	Northern NW Coast	Natural values – deemed worthy for inclusion in national park Modification – little modification from past forestry Recommendation – include	Northwest Coast Landscape/natural character – High	Whanganui inlet, coastline and coastal mountain catchment are outstanding Northwest coast is outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Coastal land – partially High and partially Outstanding Rest N/A	1 – Western coastal tertiary soft rock 3 – Upper cretaceous coal measures	1 Inclusion is mostly consistent with evidence
	Southern NW Coast	Natural values – deemed worthy for inclusion in national park Modification – little modification from past forestry Recommendation – include	Northwest Coast Landscape/natural character – High	Northwest coast is outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Coastal land – partially High and partially Outstanding Rest N/A	1 – Western coastal tertiary soft rock 4 – Western granite	1 Inclusion is mostly consistent with evidence
	Golden Bay – Mohua Marine	N/A	N/A	N/A	Golden Bay/Farwell Spit Naturalness – high, mostly unmodified Landscape – very high to outstanding	Bay – mostly High and partially Outstanding	N/A	1 Inclusion is mostly consistent with evidence
	Northwest Coast Marine	N/A	Northwest Coast Landscape/natural character – High	Northwest coast is outstanding	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	Bay – mostly High and partially Less than High	1 – Western coastal tertiary soft rock	1 Inclusion is mostly consistent with evidence

No-Consensus General	Mt Burnett	Identified as an ONF Natural values – deemed worthy for inclusion in national park Modification – some modification from dolomite mining Recommendation – exclude for existing mining licences	Collingwood Coast Landscape/natural character – High	N/A	Parapara Inlet Naturalness – high, mostly unmodified Landscape – moderate, not outstanding	Coastal land – mostly Outstanding and partially Less than High Rest N/A	9 – Golden Bay soft rock tertiary hills	2 – Partially recommend for inclusion as part of Parapara-Kahurangi Ranges ONL
	NW Nelson Conservation Park – Sam’s Creek	Natural values – deemed worthy for inclusion in national park Modification – some modification from the Cobb reservoir and Hydro installation Recommendation – exclude for mining prospecting areas and licences	N/A	N/A	Upper Takaka Valley Naturalness – moderate, some modification Landscape – high to outstanding Parapara/Kahurangi Naturalness – high, mostly unmodified Landscape – very high to outstanding	N/A	9 – Golden Bay soft rock tertiary hills	2 – Partially recommend for inclusion as part of Parapara-Kahurangi Ranges ONL
	NW Nelson Conservation Park – Te Tai Tapu	Natural values – deemed worthy for inclusion in national park Modification – little modification from past forestry Recommendation – include despite past logging	Northwest Coast Landscape/natural character – High	N/A	Northwest Coast Naturalness – high, mostly unmodified Landscape – very high to outstanding	N/A	1 – Western coastal tertiary soft rock 3 – Upper cretaceous coal measures 4 – Western granite 5 – Old hard rock mountain	1 – Recommended for inclusion as part of Southern NW Coast ONL
No-Consensus Iwi Association	Puponga	N/A	Collingwood Coast Landscape/natural character – High	Puponga inlet and coastline are outstanding	Puponga/Pakawau Coast Naturalness – low to moderate, modified Landscape – moderate, not outstanding	Headland – Less than High	8 – Golden Bay coastal fringe	3 – Partially recommended for exclusion
	Pakawau	N/A	Collingwood Coast Landscape/natural character – High	Pakawau inlet and coastline are outstanding	Puponga/Pakawau Coast Naturalness – low to moderate, modified Landscape – moderate, not outstanding	Headland – Less than High	8 – Golden Bay coastal fringe	3 – Partially recommended for exclusion

	Parapara	N/A	Collingwood Coast Landscape/natural character – High	Parapara inlet and coastline are outstanding	Parapara Inlet Naturalness – high, mostly unmodified Landscape – moderate, not outstanding	Headland – Less than High	8 – Golden Bay coastal fringe	3 – Partially recommended for exclusion
--	----------	-----	--	--	---	---------------------------	-------------------------------	---

7.2 Appendix 2 – Assessment of Risk to Landscape Characteristics from Subdivision and Land Use and Development Activities