

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of a hearing on submissions on a proposed Variation to Chapter 21 Rural Zone of the Proposed District Plan to introduce Priority Area Landscape Schedules

ON BEHALF OF R Burdon (49),
Anderson Branch Creek Ltd (113)
Gertrude Saddlery Ltd (200)
Cardrona Distillery Ltd (185)
Sir R Stewart (84)
Silverlight Studios Ltd (175)
J Burdon (182)
Allenby Farms Ltd (141)
McLintock Topp Family Trust (76)
Sunnyheights Ltd (42)
Queenstown Mountain Bike Club (119)
Cardrona Valley Farms Ltd (153)
J & J Paterson (164)
J & C Leith (156)
Pender, Brodie and Phillips (155)
CPC Trustee Ltd (169)
D Fraser (161)
Medius Wanaka Ltd (152)
P & R Gilchrist (162)
Sustainable Prospects Ltd (151)
Kincardine Angus Ltd (110)

EVIDENCE OF BENJAMIN ESPIE (LANDSCAPE ARCHITECT)

11th September 2023

INTRODUCTION AND SCOPE OF EVIDENCE

1. My name is Benjamin Espie. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the New Zealand Institute of Landscape Architects and was the chairman of the Southern Branch of the New Zealand Institute of Landscape Architects between 2007 and 2016. I am also a member of the Resource Management Law Association. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004, I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council.
2. The majority of my work involves advising clients regarding the management of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development or proposed Regional and District planning provisions as they relate to landscape issues. The primary objective of these assessments and evidence is to ascertain the effects of proposed activities or provisions in relation to landscape character, values and visual amenity.
3. Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and on behalf of private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in the rural areas of a number of districts including the Queenstown Lakes District.
4. The purpose of this evidence is to assist the Hearings Panel on matters within my expertise of landscape architecture and landscape planning in relation to various submissions on the Variation relating to the proposed Priority Area Landscape Schedules (**the PA Schedules**). The structure of my evidence is in two parts:
 - i. Evidence covering general points regarding the PA Schedules from a best-practice landscape architecture perspective, including a discussion on identification of values and related capacity, notification of mapping, and how the schedules (do not) relate to non-Rural Zoned land; and

- ii. Specific evidence sections which address submitter-specific issues, and specific PA Schedules. When discussing specific PA Schedules, the areas of land that my evidence relates to are areas that I am familiar with and have visited many times.
5. Essentially, the PA Schedules are a result of area-based landscape assessment work¹. In commenting on the notified PA Schedules, I have taken guidance from the Landscape Assessment Guidelines produced by the New Zealand Institute of Landscape Architects (**the NZILA Guidelines**)².

GENERAL POINTS OF EVIDENCE

THE NOTIFIED VARIATION AND ITS MAPS

6. The proposed Variation was notified on the 30th of June 2022. The public notice states “*this proposal is a variation to Chapter 21 Rural Zone of the PDP, to introduce proposed landscape schedules 21.22 and 21.23*”. The public notice included a link to a QLDC webpage regarding the proposed variation. That webpage included a link to a GIS map that shows the various Priority Areas on a map of the District.
7. This formal notification followed an earlier, informal stage of public consultation, which also included a similar GIS link to the mapped PAs. I comment further below in respect of specific landholdings which were the subject of a change to the PA mapping between the time of informal and formal notification.
8. Operative Strategic Direction provision 3.1B.5(e) defines Priority Areas as being areas within ONFs, ONLs and Upper Clutha RCLs and refers to the areas listed in Strategic Policies 3.3.36 and 3.3.39. These two Strategic Policies note that the Priority Areas are “*Rural Zone Priority Areas*”.
9. Policies of Section 6.3.1 (Rural Landscape Categorisation) of the PDP make it clear that ONL, ONF and RCL categories only apply to Rural Zoned land (particularly Policy 6.3.1.1). It is explicitly specified (Policies 6.3.1.2 and 6.3.1.3) that these landscape categories do not apply to

¹ This work was in response to the series of Topic 2 decisions from the Environment Court, which directed scheduling of landscape values and related landscape capacity, as a result of what it considered to be deficiencies in the Council's decision version of the PDP which failed to identify the same.

² Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architecture, July 2022.

Ski Area Sub Zones, part of the Frankton Arm, the Gibbston Character Zone, Rural Residential and Lifestyle Zones, the Wakatipu Basin Rural Amenity Zone and all of the Special Zones (such as the Rural Visitor Zone and the Mount Cardrona Station Special Zone).

10. Given the above, it is clear that Priority Areas only apply to areas within the Rural Zone. This is consistent with the public notice regarding the proposed Variation as described in paragraph 6 above; it is a variation to the Rural Zone. I consider that this should be clearly reflected on the mapping of the Priority Areas. It is confusing and pointless to have the mapped Priority Areas covering zones that they do not apply to. A secondary (and in my opinion, inferior) solution would be to make amendments to the preamble text of the Schedules to clarify that their future application to planning and consenting proposals is not anticipated or required, other than for the Rural Zone.
11. Parts 3 and 5 of Ms Gilbert's evidence describe the process by which the notified mapping came about. Ms Gilbert notes that the notified Priority Area maps were developed via preliminary draft versions, expert conferencing resulting in a Joint Witness Statement, then notification of the maps on 30 June 2022³. I agree, and again this accords with the public notice which included a link to the GIS maps, leading to my understanding that the PA mapping was notified along with the text of the schedules.
12. Ms Evans' 42a report states that submissions regarding the Priority Area mapping are out of scope and only the text is subject to notification. I do not understand that to be the case. In my understanding, the maps are part of what was notified. This is entirely expected since logically the maps should not be inserted into the PDP without being subject to submissions. I also note that in the recent hearings I was involved in for Gertrude's Saddlery Limited (**GSL**) the Independent Hearing Panel reserved determination of the applicable Priority Area boundary to be resolved through this variation process.
13. For completeness, I note that the QLDC has undertaken a series of changes to the PA mapping using clause 16 of the Act. As mentioned above, there was some informal consultation regarding the Priority Areas following the Court's topic 2 decisions, but I am unaware of any notification of the PA mapping prior to the 30 June 2022 notification for this variation.

³ Primary Evidence of Bridget Gilbert, paragraph 3.9(e).

14. In my opinion, in order to make the PA schedules and associated provisions most understandable and useful, the submissions that seek the mapping to only cover Rural Zoned land are important and the PDP would be improved by adopting that approach (or otherwise including very clear explanation in the preamble text that the Priority Area mapping and Schedules only have effect in the Rural Zone).
15. In addition to the above, I make some further points regarding the mapping of individual Priority Areas subsequently.

EVIDENCE REGARDING THE LANDSCAPE PRIORITY AREA SCHEDULES IN GENERAL

Content of the PA Schedules

16. Operative Strategic Policies 3.3.36 to 3.3.42 set out what the Priority Area Schedules are to identify. For ONF and ONL Priority Areas the key things to be identified are:
 - the landscape attributes (physical, sensory and associative) that contribute to the values that are to be protected;
 - the landscape values; and
 - the related landscape capacity for various types of development.
17. For Upper Clutha RCL Priority Areas, the key things to be identified are:
 - the landscape attributes (physical, sensory and associative) that contribute to the landscape character and visual amenity values;
 - the landscape character and visual amenity values; and
 - the related landscape capacity for various types of development.
18. The notified schedules generally achieve the above but they conflate landscape attributes and landscape values through the body of the schedules. The NZILA Guidelines state that:

Values are the reasons a landscape is valued (e.g. why it is special, or meaningful, or healthy). Values are embodied in physical attributes: values are managed by managing those physical attributes.

Assessing character and values is iterative. Interpreting a landscape's character will point to its values and evaluating the landscape's values will point to the attributes on which those values depend⁴.

19. In the summary section of each of the PA Schedules, the values are set out. While the attributes of a landscape certainly lead to its values, setting out all the attributes of each PA before listing its values means that the PA Schedules become particularly long and wordy and will become a very large appendix to the PDP. It appears that they could be made much more concise, and therefore more easily usable. One way to achieve this would be if the PA Schedules simply set out the landscape values and capacity for the ONL and ONF Priority Areas, and the landscape character and visual amenity values and capacity for the RCL Priority Areas, with all the analysis and justification information (including a discussion of the landscape attributes that lead to the values) contained in a separate report or study that is not part of the PDP.

The high-level nature of the PA Schedules

20. Ms Gilbert's and Ms Evans' recommended amended preamble to the PA Schedules sets out that:

The description of each priority area must be read in full. Each description, as a whole, expresses at a high level, the landscape values and the attributes on which those values derive.

The landscape attributes and values identified, relate to the PA as a whole and should not be taken as prescribing the attributes and values of specific sites within the PA.

...

Given the relatively high level landscape scale of the PAs, a finer grained location-specific assessment of landscape attributes and values will typically be required for plan development or plan implementation purposes (including any plan changes or resource consent applications). The PA Schedules are not intended to provide a complete record and other location specific landscape values may be identified through these finer grained assessment processes. ...

The capacity ratings, and associated descriptions, are based on an assessment of each PA as a whole, and should not be taken as prescribing the capacity of specific sites within a PA.

⁴ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architecture, July 2022, page 131.

The descriptions in the PA Schedules are relatively 'high level' and focus on describing potential outcomes that would likely be appropriate within each PA. These descriptions are not a replacement for any relevant policies, rules or standards in the District Plan, and are intended to provide guidance only. Landscape capacity is not a fixed concept, and it may change over time as development occurs or landscape characteristics change. In addition, across each PA there is likely to be variation in landscape capacity, which will require detailed consideration and assessment through future plan changes or resource consent applications.

21. I agree that the above is an appropriate understanding of the practical future application of the schedules. Obviously, the PA schedules describe the Priority Areas at a very large scale and cannot take account of the detailed characteristics of individual sites, nor can they take account of the details of potential future proposed activities. They are also based upon broad categories of types of development, rather than a specific proposal. As such, there could be infinite scenarios of particular detailed proposals within each development category. This has implications for the way that landscape capacity for activities is expressed, as I discuss subsequently.

Landscape capacity ratings

22. Landscape capacity is defined in the PDP as follows:

'Landscape capacity':

- i. in relation to an Outstanding Natural Feature or Outstanding Natural Landscape, means the capacity of a landscape or feature to accommodate subdivision and development without compromising its identified landscape values;*
- ii. in relation to a landscape character area in a Rural Character Landscape, means the capacity of the landscape character area to accommodate subdivision and development without compromising its identified landscape character and whilst while maintaining its identified visual amenity values;⁵*

23. Appendix C to the QLDC's Section 32 report regarding the proposed Variation is a Methodology Statement regarding the preparation of the notified PA Schedules. The Methodology Statement notes that:

⁵ PDP Provision 3.1B5(b).

As TtatM (NZILA Landscape Assessment Guidelines) explains: *an evaluation of (landscape) capacity is a necessarily imprecise process because it involves estimating an unknown future.*

For this reason, commentary with respect to landscape capacity is relatively ‘high level’ and focusses on describing the characteristics of development outcomes that are likely to be appropriate within the specific priority area rather than a series of measurable standards (such as a specified building height or building coverage control).

This reflects the complex nature of successfully integrating subdivision, use, and development into high-value landscape settings which typically involves a fine-grained, location-specific response. Such an approach does not fit well with the ‘one size fits all’ approach implicit in measurable standards.

It is intended that the use of this four-tier landscape capacity terminology, along with a description of the characteristics that are likely to frame development that is appropriate (from a landscape perspective), will assist in guiding the scale, location and characteristics of each landuse type that will: protect landscape values in each PA ONF/L; and maintain and enhance landscape character and visual amenity values in the PA RCL.

In a similar vein to the discussion above in relation to landscape attributes and values, it should also be noted that the evaluation and comments with respect to landscape capacity:

- a. *relate to ‘a moment in time’ and therefore may change over time; and*
- b. *have been undertaken at a ‘priority area’ scale, rather than a ‘site’ scale.*

For these reasons, the PA Landscape Schedules Guidance Note should explain that the capacity descriptions are based on the scale of the PA and should not be taken as prescribing the capacity of specific sites; landscape capacity may change over time; and across each PA there is likely to be variations in landscape capacity which will require detailed consideration and assessment through consent applications.

24. The above commentary is logical and accords with further commentary in the NZILA Guidelines that discusses landscape capacity:

‘Sensitivity’ and ‘capacity’ are widely used generic parameters. Such parameters can be useful where future proposals are not yet known (e.g. for issue-based assessments). In those circumstances, ‘sensitivity’ means the susceptibility of a landscape’s values to the potential effects of certain types of activity—for example, the susceptibility of an area’s rural character to life-style development. ‘Capacity’ is an estimate of how much of that activity could be accommodated while still retaining the specified values. ... The following caveats apply to the use of such generic parameters:

The reasons are key when assessing such parameters. For example, a landscape may be sensitive to lifestyle development (say) because it has certain wildlife values, or because it is the backdrop to a scenic location, or because it is adjacent to an historical place or wāhi tapu that warrants a contemplative setting. It is essential to provide the reasons.

Generic attributes such as sensitivity and capacity are necessarily imprecise because they estimate a future. They can be useful and necessary in policy-based assessments, or in comparing alternative routes/localities, but they become redundant once the actual effects of a specific proposal can be assessed directly⁶.

25. Key points in the above (the Methodology Statement and the NZILA Guidelines) are that:

- the rating of the capacity for a landscape to absorb a certain category of development is necessarily imprecise;
- the list of development categories is obviously not exhaustive. For types of development not listed, capacity is not rated;
- the ratings given in the PA Schedules are given at a Priority Area scale and not a site scale; they do not prescribe the capacity of specific sites;
- across each PA there is likely to be variations in landscape capacity;
- it is essential to provide the reasons for a capacity rating;
- capacity ratings become redundant once the actual effects of a specific proposal can be assessed.

26. The rating scale for capacity (as per Ms Gilbert's evidence and Ms Evans' 42a report) is currently:

- some landscape capacity;
- limited landscape capacity;
- very limited landscape capacity;

⁶ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architecture, July 2022, paragraph 5.49.

- very limited to no landscape capacity; and
 - no landscape capacity.
27. Given the commentary in my paragraphs 23 to 25 above, it is my opinion that the wording used for the landscape capacity ratings in the PA Schedules is overly precise, unhelpful and discordant with the Methodology Statement and the NZILA Guidelines. Individual sites within the Priority Areas have not been examined in detail (and I agree with Ms Gilbert that it is impractical to do so) and, of course, the specifics of future individual proposed activities have not been considered.
28. I suggest that that a more accurate way of expressing capacity for identified activities within a Priority Area, which is consistent with the intention of the schedules set out in the preamble above, would be along the lines of the following:
- Likely to be capacity for this activity in various locations within the PA. Where such development is appropriate, it will have been located and designed so that it protects the following key landscape values; *then list the landscape values of the PA that have the potential to be degraded by the particular activity, with some brief explanation/reasons;*
 - Likely to be capacity for this activity in a few locations within the PA. If and where such development is appropriate, it will have been located and designed so that it protects the following key landscape values; *then list the landscape values of the PA that have the potential to be degraded by the particular activity, with some brief explanation/reasons;*
 - Unlikely to be capacity for this activity in more than a very few locations within the PA. If and where such development is appropriate, it will have been located and designed so that it protects the following key landscape values; *then list the landscape values of the PA that have the potential to be degraded by the particular activity, with some brief explanation/reasons;*
 - Unlikely to be capacity for this activity in any locations within the PA. If and where such development is appropriate, it will have been located and designed so that it protects the following key landscape values; *then list the landscape values of the PA that have the potential to be degraded by the particular activity, with some brief explanation/reasons;*
 - Very unlikely to be capacity for this activity in any locations within the PA. If and where such development is appropriate, it will have been located and designed so that it

protects the following key landscape values; *then list the landscape values of the PA that have the potential to be degraded by the particular activity, with some brief explanation/reasons.*

29. Additionally, when each rating is given for a particular activity in a specific Priority Area, reasons and some explanation should be given that relate to that Priority Area and activity. The notified PA Schedules generally do this and I subsequently give an example of how it could be done in my evidence that relates to the Mount Iron ONF PA Schedule below. In this sense, while the bullet points in my paragraph 28 above set out the type of language that I recommend, the sentences that give the capacity rating for a particular activity in a particular PA can be somewhat bespoke; they do not need to be repeated identically through the schedules.
30. I take some support from Ms Gilbert's paragraph 9.24, which sets out that her "no capacity" rating is "evaluated at a PA level rather than a site-specific level and is intended as guidance only ... Further, the Schedule 21.22 Preamble acknowledges that a site specific (i.e. finer grained) landscape assessment as part of a resource consent or plan change application may identify a different landscape capacity rating for a landuse". She appears to be saying that a "no capacity" rating does not definitely mean that an instance of the particular activity could not be located in the relevant Priority Area, subject to finer grain analysis. It is therefore clear that that wording such as "no capacity" is not the appropriate wording to use and I refer back to my suggested approach in my paragraph 28. If such an approach was to be followed, this would require re-looking at the capacity for each category of activity within each Priority Area (although assessment would certainly not need restart from scratch).

SUBMITTER - SPECIFIC EVIDENCE REGARDING SPECIFIC LANDSCAPE PRIORITY AREAS AND SCHEDULES

21.22.3 Kimiakau (Shotover River) ONF/L Priority Area - GERTRUDE SADDLERY LIMITED (GSL)

Summary regarding this Priority Area

31. Ms Gilbert and Ms Evans recommend that one site (known as the **Gertrude site**⁷) that is outside of the Shotover River ONF, is included within the Priority Area that otherwise exclusively contains the ONF. I consider that this would create a particularly unusual, anomalous, illogical and

⁷ 111 Atley Road, Lot 1 DP518803.

unnecessary situation. This would be the only Priority Area in the district that contains land of more than one landscape category. In terms of landscape attributes and values, the Gertrude site (being 6.6ha of former farmland, until recently covered in wilding conifers and containing three dwellings) is entirely distinct from the Shotover River corridor and should not be included in the same Priority Area.

32. Subject to an Environment Court appeal, it is undetermined whether the Gertrude site is correctly categorised as ONL or not. In the event that the site is found to be of an ONL category, then strong Objectives and Policies in the PDP will protect its landscape values. If the site is found not to be ONL, then other Objectives, Policies and provisions of the PDP will appropriately apply to the site. Therefore, the Gertrude site will be appropriately managed in terms of landscape issues, without it being part of a Priority Area. There is no need to illogically attach the site to the Shotover River ONF Priority Area in order to achieve appropriate landscape outcomes.

The position of the Council Witnesses

33. Ms Gilbert recommends that the name of the notified Kimiakau (Shotover River) Priority Area ONF is changed to become the Kimiakau (Shotover River) Priority Area ONF/L. This is to allow the Gertrude site that is outside of the Shotover River ONF to be included in the Priority Area that otherwise exclusively contains the lower 17km of the Shotover River corridor ONF (the stretch from Moonlight Creek to the Shotover Delta). Ms Gilbert does this in response to a June 2023 decision of the QLDC in relation to PDP landscape categorisation and zoning at Arthurs Point⁸ (**the Gertrude Decision**) in which I was involved. This decision (which finds that the Gertrude site is part of an ONL) is subject to an Environment Court appeal and therefore, the final landscape categorisation and zoning to apply to this land is still to be determined. Even if the Gertrude site is ultimately found to be part of an ONL, this does not justify attaching it to, or including it within, the Shotover River ONF PA, as I will explain.

Mapping

34. Figure 1 and Appendix 3 of Ms Gilbert's evidence are titled "*Notified Priority Area Mapping*". On Ms Gilbert's maps, the Gertrude site is not identified within any of the green Priority Areas, as I highlight on my Appendix 1. I agree with that mapping in that it shows the Priority Area as being

⁸ QLDC: Re hearing of Submissions on Stage 1: PDP, Gertrude's Saddlery Limited and Larchmont Developments Limited at Arthurs Point, Report and Recommendations of the Hearing Commissioners, 8 June 2023.

the ONF of the Shotover River corridor, as is logical. Ms Gilbert has not recommended that these maps are amended and furthermore, Ms Evans opines that submissions that seek to alter the mapping are outside of scope. I note that the mapping Ms Gilbert has included is what was notified at the informal stage of consultation on the Schedules Variation. As discussed in my paragraphs 6 and 7 above, a GIS link was included within the public notice documents at the stage of formal notification under clause 1. The map of that GIS link included two layers, one titled “ONF and ONL Priority Areas”, which is the green-shaded map that Ms Gilbert appends. The other layer was titled “Landscape Priority Area” and used a yellow shade. The latter included all of the Gertrude site as within the Shotover River Priority Area ONF, including the Operative Low Density Residential Zoned portion of the Gertrude site. The process of this change to boundaries is the subject of related declaratory proceedings, which I defer to Counsel to further discuss.

35. Notwithstanding the above, I take the text of Ms Gilbert’s evidence (particularly paragraphs 5.1 to 5.5) to be saying that she does not support the mapping of the Shotover River ONF PA shown on her Figure 1 and Appendix 3, and instead seeks that the Gertrude site is added on to her suggested re-named hybrid 'Shotover River ONF/L Priority Area'. The reason for her suggested renaming from an ONF Priority Area to an ONF/L Priority Area appears to be because she intends it to now include one site (i.e. the Gertrude Site) that is (and has always been) outside of the 17km long river corridor ONF.
36. Other than the renaming of this Priority Area, Ms Gilbert (somewhat confusingly since her text appears to contradict her appendices) supports no amendments to the notified Priority Area mapping, even though her Figure 1 and Appendix 3 (Notified Priority Area Mapping) shows that the Gertrude site is not part of any Priority Area.
37. Ms Gilbert then goes on to recommend a few amendments to the text of Schedule 21.22.3, some of which are so that this schedule no longer just describes the Shotover River and its gorge (as was the case when notified) but now also describes the non-ONF Gertrude site, adjacent to the gorge. These amendments include altering the description of the area from:

“Kimiākau (Shotover River) PA ONF is the river corridor ...”

to

“Kimiākau (Shotover River) PA ONF/L is the river corridor and context ...”

and adding in “*roche moutonee knoll*” into the entry on “*Important landforms and land types*”.

Including the Gertrude site within the Kimiakau Shotover River ONF Priority Area

38. In short, I do not see any logical reason to alter the Priority Area that consists of the ONF of the Shotover River corridor to also take in one non-ONF site adjacent to the river corridor gorge. This would be the only ONF Priority Area in the PDP that takes in a piece of non-ONF land (requiring a change in the name of the Priority Area from ONF to ONF/L)⁹. Similarly, no ONL Priority Area in the PDP takes in land that is not ONL. This Priority Area would be unique in that, by including the single Gertrude site, it would contain land of more than one landscape category.
39. All landscape witnesses involved in the hearing that led to the Gertrude Decision (which is subject to appeal) were in agreement that the Gertrude site is not part of the ONF of the Shotover River corridor. Additionally, Dr Marion Read, as part of the 2016 rezoning hearing of the Gertrude Site, agreed the same. This site does not share attributes or values with the Shotover River corridor, since it is not part of the gorge (as I will expand on below) and is quite different in terms of landscape character including the degree of modification. Therefore, my opinion is that it should not be added into the same Priority Area or the same schedule, which is fundamentally about the Shotover River gorge values and related capacity. This would amount to an anomalous “add-on” to a Priority Area that is otherwise a well-defined river corridor.
40. Even in terms of District Plan mechanisms, there is no justification or logic in adding this particular site onto the Shotover River PA. If, through the resolution of the relevant appeal, the site is found to be ONL, then it is given strong protection by the Objectives and Policies of PDP Chapters 3 and 6; it does not also need to be attached to a Priority Area in order to have its values protected. If it is found to be an ONL, it logically would be identified as part of one of the ONLs that it is said to be a part of, rather than added to the adjacent ONF. If it is found not to be ONL, then other Objectives, Policies and provisions will appropriately apply to the Gertrude site.
41. If, contrary to the Council's evidential position, there is scope to determine the ONF Priority Area boundary as part of this process, based upon my values assessment below, I do not consider the ONF PA boundary should include the Gertrude Site, because it does not exhibit the

⁹ Regarding the determination of what is a feature, I note that the Joint Witness Statement regarding landscape methodology sets out that “a feature typically corresponds to a distinct and clearly legible biophysical feature (e.g. *roche moutonnee*, *volcanic cone*, *water body*).” This is stated in paragraph 160 of the Joint Witness Statement arising from expert conferencing, Topic: Landscape Methodology and Subtopics 2, 3, 5, 6, 7, 8, and 10, January 2019.

landscape attributes and values of the Shotover River ONF, for instance it is more modified and less natural than the type of rural land that we would expect to see even in a non-ONL Rural Character Landscape.

42. I have arrived at the above conclusions following a first principles landscape assessment of the relevant area; including the Shotover River corridor and the Gertrude site. That assessment has been done iteratively over a period of years through my involvement with the PDP in this part of the District. For concision, I set out the findings of that assessment as follows (reference to my Appendices 2, 3 and 4 is useful).

The landscape attributes and values of the relevant area

Physical Attributes¹⁰

43. With reference to Appendix 2, the Arthurs Point area sits at the confluence of a number of broad-scale landforms. The Shotover River drains from the northwest, between the Ben Lomond / Bowen Peak mountain landform, to the river's southwest, and the Mount Dewar/Coronet Peak mountain landform, to its northeast. At Arthurs Point, the Shotover runs in a curved gorge round the southward-extending terraced headland on which Arthurs Point settlement sits, to reach Big Beach. From there, the Shotover runs east, again through a gorge to follow the western edge of the Wakatipu Basin, where the river corridor becomes less enclosed and more broadly open. Running south from Arthurs Point, The Gorge (and Gorge Road) connects to Queenstown, between the slopes of Bowen Peak and Queenstown Hill.
44. Human influence and settlement have occurred incrementally but the goldrush of the 1860s followed by pastoralism left the Arthurs Point area as rural farmland until the late 1970s. The terraced headland on which the central area of Arthurs Point settlement (and the Gertrude site) sits was farmland until the early 2000s. Since then it has developed in accordance with the Operative District Plan's Low Density Residential Zone (**LDRZ**). However, the southern part of the Operative LDRZ, which is within the Gertrude site) has not yet been developed.
45. Essentially, the operative LDRZ of this part of Arthurs Point has been configured so as to occupy the terraced and rolling topography on the top of the headland that extends south between Big Beach and the Oxenbridge tunnel. This zoning includes the northern part of the Gertrude site but

¹⁰ The NZILA Guidelines define physical attributes as "both the natural and human-derived features, and the interaction of natural and human processes over time", at paragraph 4.23.

the bulk of that site (despite sitting on the top of the headland) has been left as a remnant area of Rural Zone, although this zoning of the Gertrude site is subject to Environment Court appeal. The Shotover corridor itself, being particularly steep in the gorge areas and floodplain in the more open areas, is devoid of built development, contains areas of remnant native vegetation, but is largely unkempt. The parts of the Shotover River corridor that are adjacent to the Arthurs Point area take the form of a steep-sided (often practically vertical) gorge.

46. For current purposes, it is relevant that there is abrupt and distinct physical geomorphological separation between the river gorge and the terraced rolling headland on which central Arthurs Point (and the Gertrude site) sit, as is shown on my Appendices 3 and 4. I note that the Landscape Joint Witness Statement on methodology for identifying ONLs and ONFs¹¹ which relates to the PDP Topic 2 appeals states that “*geomorphological boundaries (such as ridgelines and other marked changes in landform gradient) are the preferred boundary delineation method for ONLs and ONFs*”.
47. The Gertrude site itself (Lot 1 DP518803) contains three dwellings, a number of accessory buildings, water tanks and vehicle tracks. Dense and mature wilding conifers (very largely Douglas fir) have been removed from the site and adjacent DOC land over the last year, which has exposed the rolling, terraced topography of the site, which was (up until approximately 50 years ago) farmed paddocks. Obviously, the tree removal work has left a short-term situation where the site is particularly disturbed superficially and includes log piles and tree processing activity.
48. The mountain slopes that surround Arthurs Point (of Mount Dewar, Bowan Peak and Sugarloaf/Queenstown Hill) have historically been extensively farmed as part of large farming operations. Recreational use (including commercial recreation) has spread into them in a relatively minor way in recent decades. Wilding exotic trees have also been an influence. In general, they retain an open brown-top and tussock dominated vegetation cover, meaning that the steep, dramatic landforms are easily legible.

¹¹ Joint Witness Statement arising from expert conferencing, Topic: Landscape Methodology and Subtopics 2, 3, 5, 6, 7, 8, and 10, January 2019.

Associative Attributes¹²

49. Within the river corridor, but also in surrounding areas, many historic features remain from the gold mining period. Recreational associations are also important within the river corridor, including the long-established Shotover Jet commercial operation, as well as kayaking and private recreational river use, fishing in some locations and informal recreation within riverside public land.
50. As is the case throughout much of the Wakatipu, recreational tracks provide associations with the landscape. Public trails allow recreational connections from Arthurs Point to Queenstown and north to the Devil's Creek Conservation Area. No trail connection currently runs east of Arthurs Point along the river corridor but from Littles Road eastward, trail connections link into the Wakatipu Basin network and allow connections along the river corridor to the Kawerau confluence.
51. The surrounding mountain slopes bring associations with colonial period high-country farming and also with mountain recreation; most relevantly via Coronet Peak Ski Area and Devil's Creek Conservation Area.

Perceptual Attributes¹³

52. The perceptual attributes of the landscape are largely a result of its physical composition. The mountain slopes are perceived as a rugged, open and natural backdrop that contains the Wakatipu Basin and its various landscape components. These are important to many views from within the basin, including from The Gorge and the Arthurs Point area. The largely open vegetation cover and lack of buildings and structures imparts an appreciation of naturalness associated with these mountain slopes and jagged skylines. Landform is easily legible and changing light, weather and atmospheric conditions play on these slopes and gullies, bringing about high aesthetic qualities and memorability. These mountain faces form an important and recognisable frame to the Wakatipu Basin.
53. The Shotover River corridor alternates between being a narrow gorge in parts and a more open alluvial course as it crosses parts of the basin. However, in all parts, it is a clearly legible river

¹² The NZILA Guidelines define associative attributes at paragraph 4.23 as "*the intangible things that influence how places are perceived – such as history, identity, customs, laws, narratives, creation stories, and activities specifically associated with a landscape*".

¹³ The NZILA Guidelines define perceptual attributes at paragraph 24.3 as being "*both sensory experience and interpretation. Sensory appreciation typically occurs simultaneously with interpretation, knowledge, and memory*".

feature. Many attractive views are available up and down the river from numerous public (and private) viewpoints. Natural processes and components dominate its visual character. Particularly dramatic and memorable are the narrow rocky gorges and areas of rapids, bringing a striking experience of wildness and remoteness.

54. The flats and terraces of the basin and valley floor parts of the landscape have been tamed by a history of farming and by more recent settlement and occupation. Areas such as the Wakatipu Basin floor and the rolling terrace lands on which Arthurs Point sits, are pleasant and attractive areas, initially characterised by agriculture and then subsequently, residential settlement including buildings and associated development. This has recognisably followed landform, as is to be expected, the farmed and settled lands being significantly less steep and often with more useful soils. This brings a visual logic to the pattern of the tamed lands versus the wilder, steeper lands (whether they be mountain slopes or the river gorge). These flatter, tamed areas are therefore perceived as less natural and less dramatic and memorable when compared to the river gorges or the mountain faces. Nonetheless, they are experienced as pleasing and appealing areas in their own right.

Landscape Values¹⁴

55. The attributes described above lead to the associated landscape values. In a broad sense, the entire landscape is valued in a combined way. However, I consider that the reasons that the landscape is valued (i.e. its landscape values) can helpfully be broken down as follows:
- The mountain slopes, faces and skylines are valued because of their dramatic, vast scale, largely undeveloped and unoccupied nature, open, legible landform and their role in memorable, remarkable views;
 - The river corridor is valued because of its wild and untamed experiential and aesthetic qualities, its unkempt and largely unmodified character and the many views associated with these qualities.
 - The flatter basin floor and rolling terrace lands are valued because of their pleasant and attractive character and quality as rurally occupied or more settled locations of human

¹⁴ The NZILA Guidelines define landscape values at paragraph 5.6 and the glossary as “the reasons a landscape is valued – the aspects that are important or special or meaningful” and note that “values are embodied in certain attributes”. Also, at paragraph 5.55, it is noted that “hybrid terms such as ‘visual amenity’, ‘rural amenity’ and natural amenity’ are shorthand for ‘landscape values that contribute to amenity values’”.

influence, habitation and associated built form; areas of human use within a dramatic broader landscape setting.

Conclusions regarding this Priority Area

56. The assessment of the landscape attributes and values, as set out in my paragraphs 43 to 55 has led me to the conclusions set out in my paragraphs 38 to 41; whether or not the Gertrude site is ultimately found to be part of an ONL, I can see no logic in altering the notified Shotover River ONF Priority Area so as to take in the Gertrude site that sits on the terrace lands. To do so would make this Priority Area and its schedule particularly unusual and anomalous within the context of the rest of the District Plan, and in contradiction of the Environment Court's directions to include a priority area ONF. If the Gertrude site is left out of the Priority Area, and is eventually determined to be part of an ONL (as the Gertrude Decision held), it will continue be appropriately protected (in terms of landscape issues) by strong provisions of the PDP.
57. For the avoidance of doubt, I do not consider the Gertrude site to be part of a broader ONL, as set out in my evidence to the Independent Hearing Panel on the Gertrude Decision, and as based upon my values assessment for the Gertrude site (summarised above). I do not consider it to share any of the attributes of values of any surrounding ONL (including in particular, the West Whakatipu ONL or the Central Whakatipu ONL).
58. In the event that the Commissioners decide that the Gertrude site is within the Shotover River ONF Priority area (or a re-named version of it), then I consider that the text of the relevant Schedule would need to be considerably amended to take account of the different attributes and values of the Gertrude part of the Priority Area and to set out different capacities for the various types of activities that are listed.

21.22.15 Central Whakatipu Basin ONL Priority Area

59. I refer to the planning evidence of Mr Vivian on behalf of the Queenstown Mountain Bike Club and Mr Devlin on behalf of Sir Robert Stewart. Those briefs of evidence suggest some changes to the schedule relating to the Central Whakatipu Basin ONL PA.
60. I agree with the suggestion that the Bordeau's Store (PDP Heritage Feature 57), the nearby ruins of the Skipper's Hotel and associated remnant sections of the original Skipper's Road should appropriately be included in the Schedule under the heading of "Important Archaeological and Heritage Features". These elements combine with the Cockburn Homestead (PDP Heritage

Feature 125) to give historic significance to the vicinity at the base of Skipper's Road (the lower section of which is now known as Coronet Peak Road), which was at one time a busy base for travel to the Skipper's goldfields. Elements of this sort give a layer of meaning to the landscape.

61. I agree with the suggested amended wording regarding capacity for earthworks associated with recreational public access tracks and for trails (under the heading of Transport Infrastructure). Wording (as suggested) that follows the format of the notified wording relating to Rural Living capacity is clearer. Additionally, earthworks associated with the formation of recreational walking or cycle trails is quite different to earthworks associated with new built development or vehicle transport infrastructure. Frequently, walking/cycle trails can be constructed with minimal adverse effects on the physical or perceptual values of a landscape and with significant positive effects in relation to recreational values. There are many examples of this within the Central Whakatipu Basin ONL PA such as the Rude Rock, Zoot, Coronet Face Water Race, Hot Rod, Slip Saddle Trails and numerous others that have been constructed while being practically undetectable from any distance. I therefore agree with the suggested amended wording regarding capacity and note that standards of the Rural Zone regulate earthworks in any event, regardless of what activity they are associated with.
62. I agree with the suggested amended wording regarding the capacity for visitor accommodation and rural living that is co-located with existing development or existing built form. "*Development*" is not defined in the PDP and in this context, it could potentially be interpreted to mean only recent subdivision and/or building, whereas the intention of the notified schedule (which I agree with) appears to be that where new built development is appropriate, it is likely to be co-located with existing buildings and structures (although, of course, it will be subject to the relevant ONL provisions of the PDP in any event). The suggested wording makes this clearer.

21.22.23 Hawea South North Grandview ONL Priority Area

63. Lake Hawea was raised by 20 metres in 1958 as part of the Waitaki Valley hydroelectric power scheme. Prior to that, the lake was considerably smaller. The lake is managed with a controlled level between 338masl and 346masl. Its surface level fluctuates seasonally but mean level is approximately 343masl. In numerous places, the raised lake perimeter has resulted in instances of erosion at the lake edge. Slips and areas of exposed steep ground often meet the waters' edge.

64. A number of pastoral runs surrounded the original, natural and smaller Lake Hāwea from the 1850s and the land has been continually farmed since that time. The homestead areas of Glen Dene, Hunter Valley, and Dingle Burn Stations accommodate various remnants of early colonial high-country farming. There are only a few locations around the perimeter of Lake Hāwea where human occupation exists. These are locations such as Hāwea Township, Gladstone, Dingle Burn Valley, Hunter Valley Station homestead and Kidd's Bush, as well as the Glen Dene home-paddocks area. The Glen Dene home-paddocks area takes the form of a long, north-south running area of deposited terrace/fan geomorphology on the western side of the current lake. Much of the original home-paddocks area are now underwater. The current home-paddocks are improved, verdant pasture and they contain the Glen Dene homestead, a number of other dwellings (including the property known as The Dene) and farm infrastructure and buildings. A similar area of pasture on fan geomorphology exists on the opposite side of the lake between Timaru River and Bushy Creek but is less improved and is unoccupied paddock-land.
65. Under the heading of "*Important land-use patterns and features*" (particularly paragraphs 17 and 19), I consider that Schedule 21.22.23 would be improved by making it clearer that the Glen Dene Station home paddocks area of improved pasture is a relevant and sizable area of land use that is distinct from the overall character of the broader landscape and is characterised by more intensive farming management.
66. The engineering works done in the 1950s and subsequent decades that have led to the raising of the lake by 20m and vastly increasing its surface area are important to the attributes of the landscape and the values that stem from them. While mention is made of this in Schedule 21.22.23, I consider that more needs to be made of this aspect of the landscape in the schedule, particularly in relation to historic attributes and values (paragraphs 41 and 42), shared and recognised attributes and values (paragraphs 43 to 49) and naturalness attributes and values (paragraphs 66 to 69).
67. The engineering work that led to the artificial raising of the lake surface is a key factor in the formation of the present-day landscape. This aspect of the landscape's formation is likely to be more known to locals (or at least New Zealand visitors) rather than international visitors. For some of these observers, the engineering aspects of the Lake Hāwea Control Dam, the flooding of the valley and the broader Waitaki Valley hydroelectric power scheme will add interest and meaning to the landscape and this should be reflected in the schedule.

68. In relation to the above matters, I therefore suggest that additional text should be added to Schedule 21.22.23 regarding the Glen Dene home-paddocks area (in paragraphs 17 to 19) and the hydroelectric engineering work that led to the very significant enlargement of the lake surface (in paragraphs 41 to 42, 43 to 49 and 66 to 69).

21.23.2 Halliday Road / Corbridge RCL Priority Area

69. I refer to the planning evidence of Mr Edgar on behalf of Silverlight Studios Ltd. That brief of evidence suggests some changes to the schedule relating to the Halliday Road / Corbridge RCL Priority Area.
70. Essentially, Mr Edgar's suggestions seek to ensure that the extensive film studio, for which current resource consents exist, is accurately represented within the Schedule. Those resource consents are currently in the course of being actioned. I agree with Mr Edgar's suggestions and give the following explanations.
71. As set out in Mr Edgar's evidence, current resource consents provide for a very extensive, and in places intensive, film studio complex and associated activities across the site that is known as Corbridge. While the consented activities are of a large scale, one of the bases on which the activities gained consent was that the visual amenity and landscape character of the RCL landscape would be maintained. In essence, this maintenance of the landscape was achieved through the characteristics of the site (particularly its landform) and through the detailed design and location of the individual components of the activity. I therefore agree that mention of the large basin-like landform within the rolling moraine of the central part of the Corbridge site is appropriate within the Schedule.
72. The consented film studio activities involve some significant re-contouring of the rolling landforms on the northern side of SH6 in relation to the eastern third of the PA. While this re-contouring involves substantial volumes, its consented design replicates and builds on natural landform. Additionally, the consented activities involve a comprehensive landscaping regime over the film studio land, which was scrutinised, amended and ultimately consented such that it achieves maintenance and enhancement of visual amenity and landscape character. I therefore agree with Mr Edgar that reference should be made to these consented landform and vegetation changes that will become relevant parts of this RCL landscape, such as in paragraphs 12, 27, 30 and 31 of the Schedule (as attached to Mr Edgar's evidence).

73. The relevant existing resource consents also provide for temporary outdoor film set activities and occasional events (such as weddings) in certain defined parts of the Corbridge site. While transient, I agree that the scale of the site within this relatively small PA mean that they are worthy of mention within the Schedule.
74. In an overall sense, I agree with Mr Edgar that, given the scale of the consented film studio and associated activities that will appear in the landscape over upcoming years, it is appropriate that they are fully acknowledged in the relevant Schedule.

21.22.18 Cardrona Valley ONL Priority Area

75. I refer to the planning evidence of Mr Edgar on behalf of Cardrona Distillery Ltd. That brief of evidence suggests some changes to the schedule relating to the Cardrona Valley Priority Area. Essentially, Mr Edgar's suggestions seek to ensure that the existing and consented activities and buildings associated with the Cardrona Distillery are accurately and appropriately represented within the Schedule. The distillery has a tourist attraction aspect associated with it but it is primarily a rural industrial activity and one that has been established with the long-term in mind.
76. I agree with Mr Edgar's suggested insertions into the Schedule that acknowledge the distillery and its rural industrial activity as a relevant element of land use patterns within the Cardrona Valley and its presence as a clearly visible node of built development. The distillery is a plainly recognisable and memorable aspect of the road journey through the valley, with its distinctive gabled, stacked schist buildings.
77. I also agree that some degree of capacity should be noted for evolving rural industrial activities associated with the distillery over time, provided that the landscape values of the Cardrona Valley are protected, which, of course, is required by the PDP's Strategic Objectives and Policies.

21.22.11 Mount Iron ONF Priority Area

78. I have examined the submission made on behalf of Allenby Farms Ltd and have considered the amended version of the relevant PA Schedule that is attached to Ms Evans' s42A report.
79. Subject to the various more general points regarding the schedules that I make in the first part of this evidence, I consider that the amended version of the Schedule is broadly an appropriate description of the landscape attributes and values of the Mount Iron ONF. The only addition that I consider would be helpful is to add "*at the northern extreme and at the northwest corner*" at the

end of paragraph 19, to give clarity regarding the location of the more modified parts of the ONF that contain buildings.

80. One of the concerns of the submitter is in relation to the ability to alter or renovate the two existing dwellings that they have on their site. In relation to this point, while I agree that there certainly is minimal capacity for new instances of rural living within the ONF, there is at least some capacity for additions and alterations to the existing buildings. Again, this would be subject to protecting the ONF's values, as is required by the PDP's Strategic Objectives and Policies. I give suggested wording on this capacity below.
81. Similarly, I agree that recreational tracks should appropriately be separated from "earthworks" and "transport infrastructure" in terms of the capacity ratings. The geomorphology of Mount Iron is varied and rolling. As previously mentioned, the formation of recreational trails is quite different to earthworks associated with new vehicle transport infrastructure or with earthworks generally and walking/cycle trails can often be constructed with minimal adverse effects on the physical or perceptual values of a landscape. I therefore give some suggested wording on these capacity ratings below, which still give clear guidance that caution is needed and that the relevant landscape values must be maintained.
82. My suggested wording for the capacity ratings for these activities within the Mount Iron ONF PA are:

Rural living - very unlikely to be capacity for new rural living in any locations within the PA, since new built development and curtilage are liable to be visually (or otherwise) disruptive to the prominent, distinctive landform, openness and naturalness of Mount Iron. **Unlikely** to be capacity for additions or replacements in relation to existing rural living activities. If and where such development is appropriate, it will have been located and designed so that it protects the landscape values of geomorphological legibility, memorability, naturalness and contrast with surrounding urban areas.

Earthworks – very unlikely to be capacity for new earthworks and additional trails or access tracks in any locations within the PA, since excavations or areas of fill material are liable to be visually (or otherwise) disruptive to the prominent, distinctive landform, openness and naturalness of Mount Iron. **Unlikely** to be capacity for earthworks for recreational trails in more than a very few locations. If and where such development is appropriate, it will have been located and designed so that it protects the landscape

values of geomorphological legibility, memorability, naturalness and integration with existing natural landform patterns.

Transport Infrastructure - very unlikely to be capacity for this activity within the PA, since excavations or areas of fill material are liable to be visually (or otherwise) disruptive to the prominent, distinctive landform, openness and naturalness of Mount Iron. **Unlikely** to be capacity for transport infrastructure in the form of recreational trails in more than a very few locations. If and where such development is appropriate, it will have been located and designed so that it protects the landscape values of geomorphological legibility, memorability, naturalness and integration with existing natural landform patterns.

CONCLUSIONS

83. It is my understanding that the notified variation applies to the Rural Zone only. This accords with operative Strategic Objectives and Policies that confine the Priority Areas to parts of the Rural Zone ONLs, ONFs and RCLs. I also understand that maps of the Priority Areas form part of the notified Variation, as per the link to the GIS maps that was included in the public notice of the Variation.
84. I agree with the Methodology Statement (attached to the Section 32 report) and the NZILA Guidelines, that landscape capacity ratings are necessarily imprecise, do not prescribe the capacity of specific sites, are only given for broad categories of activities and that capacity is likely to vary across a particular PA. I therefore conclude that the wording of the capacity ratings in the notified Variation is inappropriate. I have given a suggested alternative approach that I consider should be applied to all schedules.
85. Regarding the Kimiakau Shotover River ONF Priority Area, I do not see any logical reason to alter the Priority Area that consists of the ONF of the Shotover River corridor to also take in one non-ONF site (the Gertrude site) adjacent to the river corridor gorge. To do so would make this Priority Area and its schedule particularly unusual and anomalous. If the Gertrude site is left out of the Priority Area, it will continue be appropriately protected (in terms of landscape issues) by strong provisions of the PDP.
86. Regarding the Central Whakatipu Basin ONL Priority Area, I agree with Mr Vivian's suggested amended wording of this schedule, which includes some additional historic features, amends the

ratings of capacity in relation to earthworks associated with recreational trails and in relation to rural living and visitor accommodation that is co-located with existing development or built form.

87. Regarding the Hawea South North Grandview ONL Priority Area, I suggest amended wording of the relevant schedule in order to make it clearer that the Glen Dene Station home paddocks area of improved pasture is a relevant and sizable area of land use that is distinct from the overall character of the broader landscape and is characterised by more intensive farming management. I also suggest amendments to emphasise the man-made nature and Lake Hawea and that the engineering aspects of the work that was done to achieve this are important to historic, naturalness and shared and recognised values.
88. Regarding the Halliday Road / Corbridge RCL Priority Area, I agree with Mr Edgar's suggested amended wording of this schedule, which more accurately represents the importance of the consented film studio and associated activities in relation to this relatively small Priority Area. The consented activities that will appear over upcoming years are extensive and, in places, intensive such that they are important aspects of the attributes that lead to this PAs landscape values.
89. Regarding the Cardrona Valley ONL Priority Area, I agree with Mr Edgar's suggested amended wording of this schedule, which more accurately represents the influence of the existing Cardrona Distillery within this Priority Area. The distillery features recognisable and memorable gabled schist buildings and a rural industrial land use. I agree that capacity for future evolution of this rural industrial land use exists, while maintaining the values of the PA and broader ONL.
90. Regarding the Mount Iron ONF Priority Area, in addition to my more general points regarding the wording of capacity ratings, I suggest some specific wording in relation to additions or replacements of existing rural living dwellings and earthworks for the purposes of recreational trails. I consider that there is some capacity for the ONF to absorb appropriately designed activities of this sort while protecting its landscape values.

Benjamin Espie

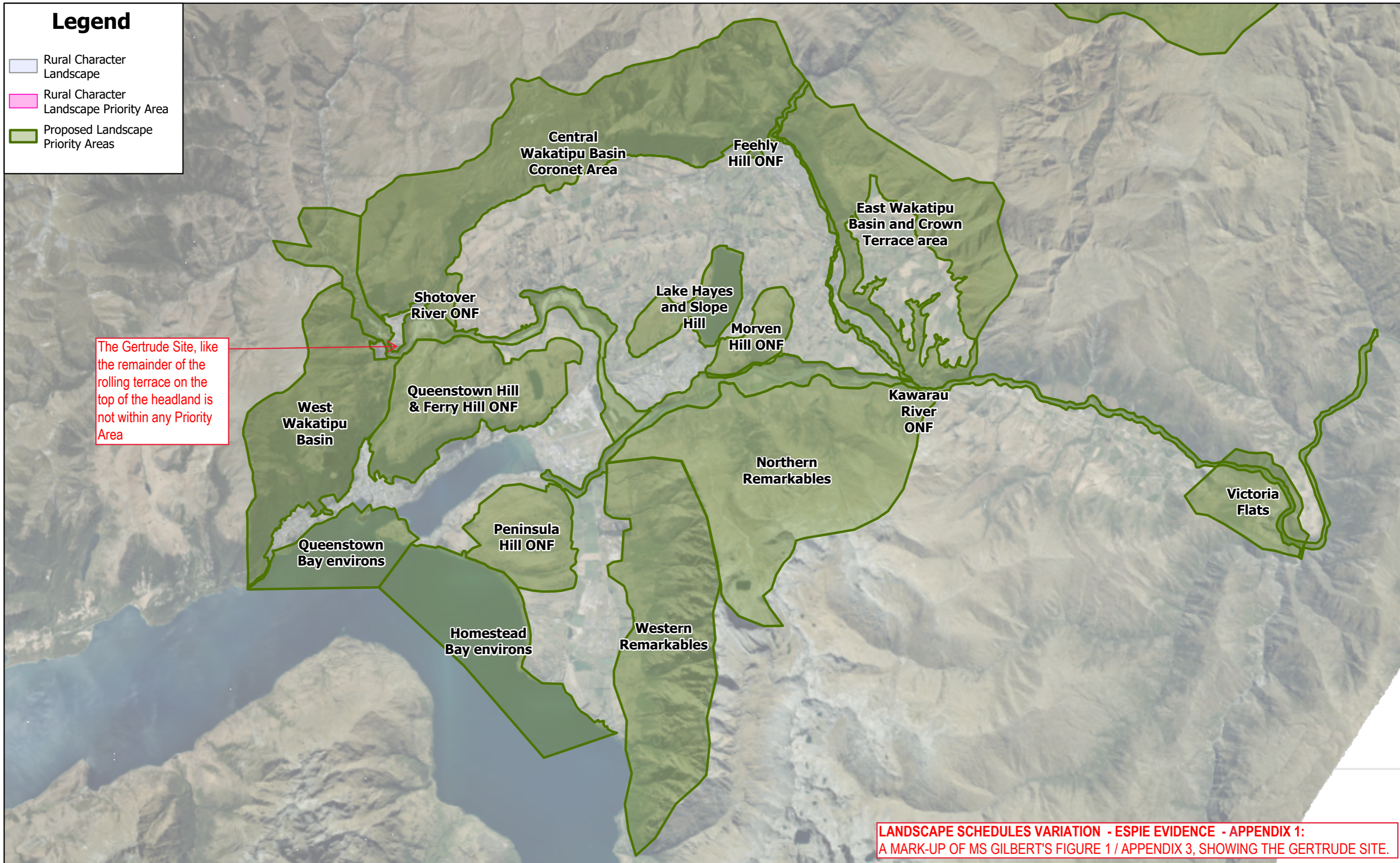
vivian+espie

11 September 2023

ATTACHED APPENDICES:

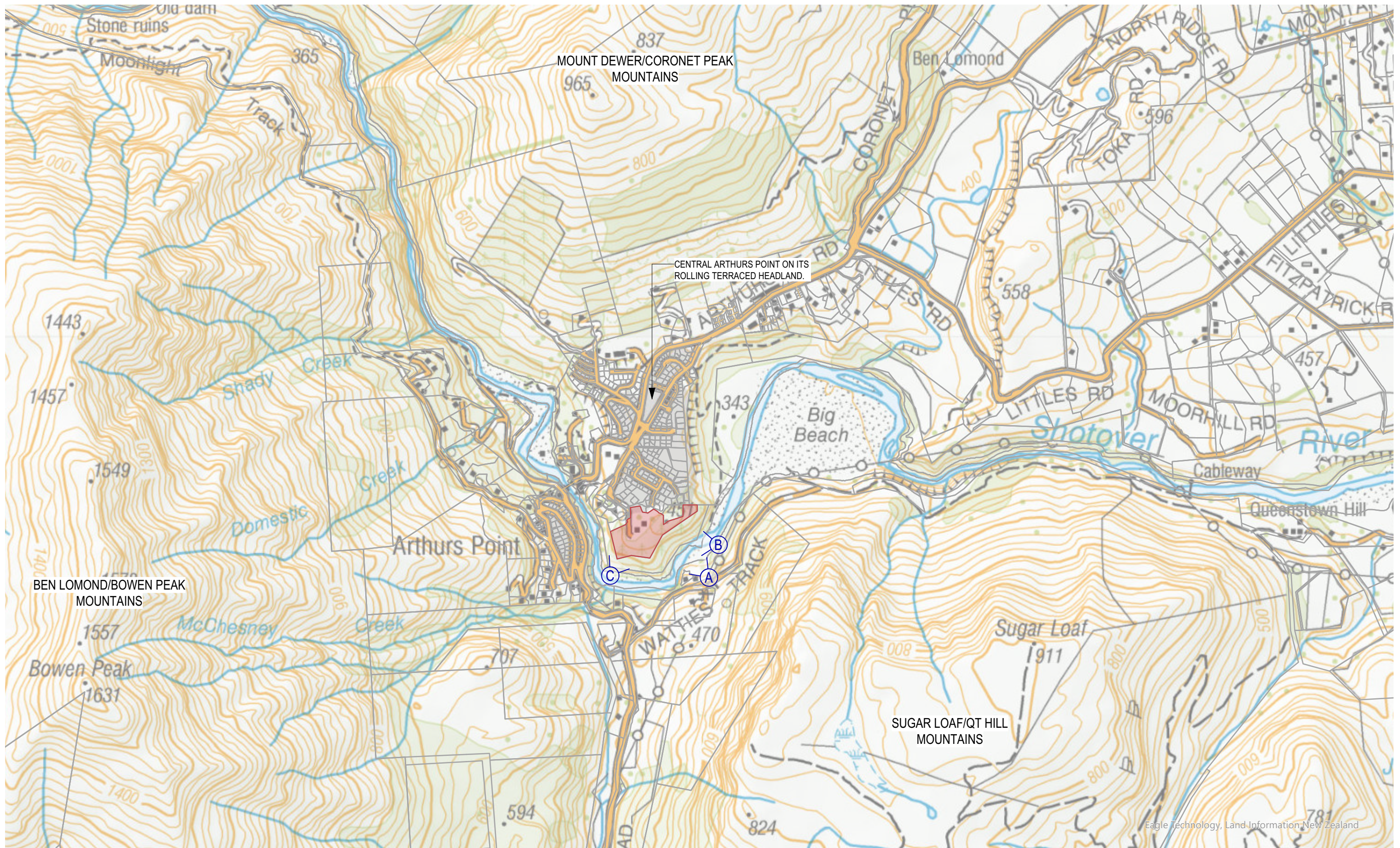
1. MARK-UP OF MS GILBERT'S FIGURE 1 / APPENDIX 3.
2. KIMIAKAU SHOTOVER RIVER ONF PRIORITY AREA CONTEXT PLAN.
3. KIMIAKAU SHOTOVER RIVER ONF PRIORITY AREA DRONE PHOTOGRAPHS.
4. KIMIAKAU SHOTOVER RIVER ONF PRIORITY AREA PHOTOGRAPHS.

Wakatipu Landscape Schedules



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**LANDSCAPE SCHEDULE VARIATION - ESPIE EVIDENCE - APPENDIX 2:
 CONTEXT PLAN IN RELATION TO KIMIAKAU SHOTOVER RIVER ONF PRIORITY AREA
 NOTE: Gertrude site is shaded in red**



Drone Photograph A: from above the river corridor to the southeast of the Gertrude site looking west. The Gertrude site contains various buildings and consists of rolling terrace land, akin to the land on which the suburbs of Arthurs Point sit, in the right-hand part of the photograph. The yellow line marks the edge between the ONF of the river corridor and the rolling terrace on the top of the headland, which accommodates the Arthur's Point suburbs. The right-hand part of the Gertrude site, as far left as the two white water tanks on a local high point, is zoned operative Low Density Residential Zone. The shaded, steeply falling land is the side of the gorge and is part of the river corridor.



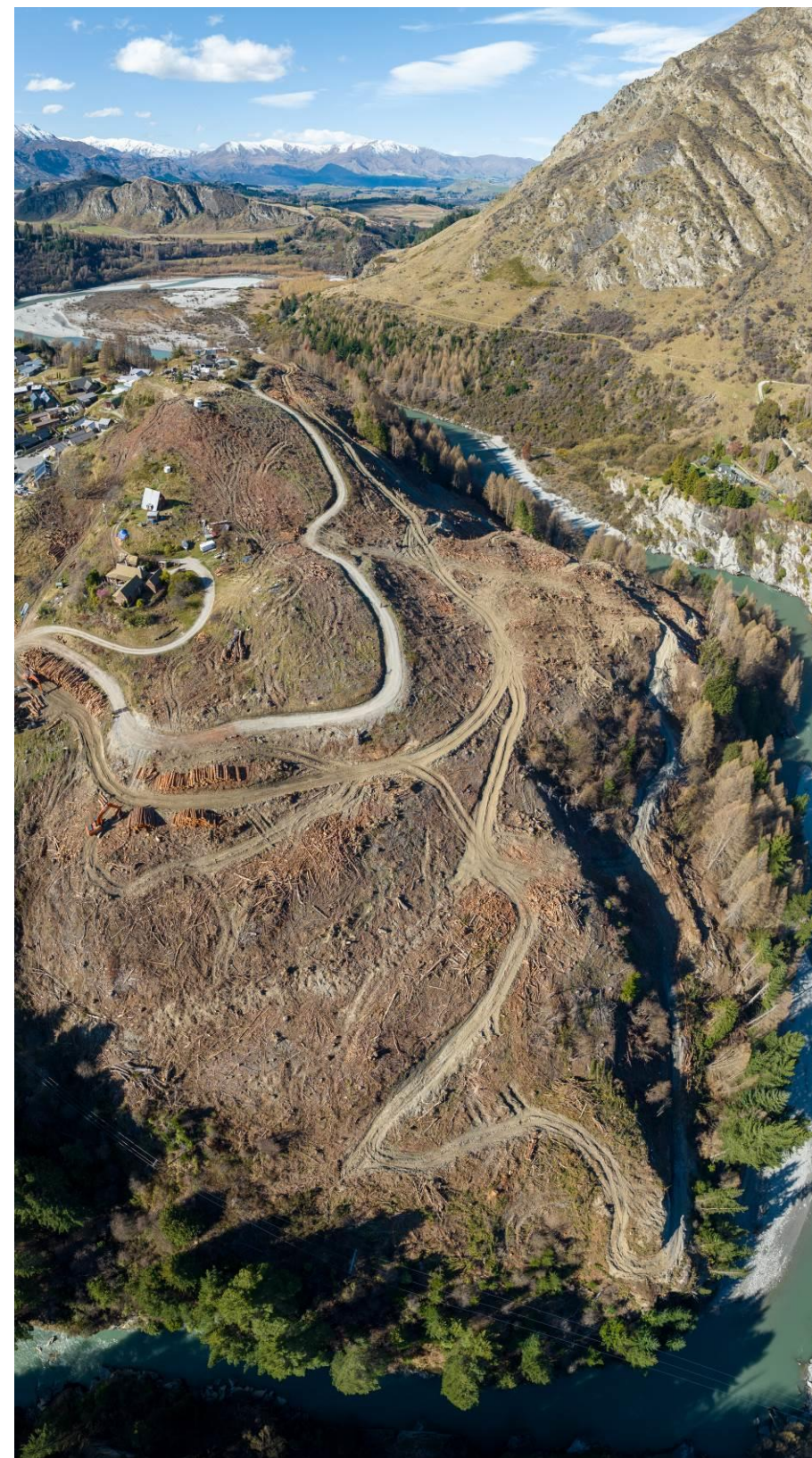
Drone Photograph B: from approximately eye level within the southern part of the Gertrude site. Two yellow circles highlight pink pegs that make the southern edge of the Gertrude site. Closely beyond those pegs, landform abruptly drops away into the river corridor. Dwellings of western Arthur's Point and the Wattie's Track area can be seen on the far side of the gorge.

LANDSCAPE SCHEDULES VARIATION – ESPIE EVIDENCE – APPENDIX 3: DRONE PHOTOGRAPHS OF THE KIMIAKAU SHOTOVER RIVER ONF PRIORITY AREA AND THE GERTRUDE SITE.

All drone photographs were taken on the 7th of September 2023 with variable focal length.



Drone Photograph C: from above the western part of the Gertrude site looking east. Key attributes of the Gertrude site itself are recognisable in the form of the various buildings, vehicle tracks and rolling terraced landform.



Drone Photograph D: from above the Shotover River to the west of the Gertrude site looking east. The distinction (in terms of landscape attributes and values) between the Gertrude site and the Shotover River corridor is readily apparent.

LANDSCAPE SCHEDULES VARIATION – ESPIE EVIDENCE – APPENDIX 3: DRONE PHOTOGRAPHS OF THE KIMIKAU SHOTOVER RIVER ONF PRIORITY AREA AND THE GERTRUDE SITE.
All drone photographs were taken on the 7th of September 2023 with variable focal length.



Drone Photograph E: from above the public (DOC) land to the immediate southeast of the Gertrude site looking west. The ground that is in the sun is the Gertrude site; part of the rolling terrace that continues further to the right (out of the frame). The shaded ground (that includes some rough bulldozer tracks) is the steep side of the gorge that is part of the river corridor.



Drone Photograph F: from a very similar location to Drone Photograph A but showing a portrait view. The Gertrude site contains various buildings and consists of rolling terrace land, akin to the land on which the suburbs of Arthurs Point sit, in the right-hand part of the photograph. Again, the shaded, steeply falling land is the side of the gorge and is part of the river corridor.



Photograph A: Looking over the Shotover Gorge from Wattie's Track to the Gertrude site. The yellow line marks the edge between the ONF of the river corridor and the rolling terrace on the top of the headland. The Gertrude site is entirely uphill of the yellow line.



Photograph B: In the Shotover Gorge part of the river corridor on the true right (southeastern) side of the river looking upstream. No part of the Gertrude site can be seen; it is well beyond the ridgeline on the right hand side of the photograph. The landscape attributes and values of the river corridor are markedly different and distinct when compared to those of the Gertrude site and the rolling terrace on top of the headland.

LANDSCAPE SCHEDULES VARIATION – ESPIE EVIDENCE – APPENDIX 4: PHOTOGRAPHS OF KIMIAKAU SHOTOVER RIVER ONF PRIORITY AREA.

All photographs were taken on the 5th of September 2023 with a fixed focal length of 50mm.



Photograph C: In the Shotover Gorge part of the river corridor on the true left (northern) side of the river looking downstream. The Gertrude site is considerably beyond the photograph to the left. Again, the landscape attributes and values of the river corridor are markedly different and distinct when compared to those of the Gertrude site and the rolling terrace on top of the headland.