

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

UNDER THE Resource Management Act 1991 ("**Act**")

IN THE MATTER OF a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23 (**PA Schedules**)

AND IN THE MATTER OF a submission on the PA Schedules

BETWEEN **HAWTHENDEN TRUST**

Submitter

AND **QUEENSTOWN LAKES DISTRICT COUNCIL**

Planning authority

SUMMARY STATEMENT OF EVIDENCE OF NIKKI SMETHAM

*Before a Hearing Panel: Jane Taylor (Chair),
Commissioner Peter Kensington and Councillor Quentin Smith*

INTRODUCTION

Background, qualifications and experience

1. My full name is Nicola (Nikki) Jane Smetham. I am a Senior Landscape Architect with Rough Milne Mitchell Landscape Architects Limited (RMM), formerly Rough and Milne Landscape Architects Limited and have held this position since 2009.
2. My qualifications and experience are set out in paragraphs 2 – 3 of my statement of evidence. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence.

3. My evidence addresses the landscape values for Schedule 21.22.19 ONL Mount Alpha Priority Area (PA).
4. I attended the Expert Conferencing during the first week of October 2023 and signed:
 - (a) The Landscape Architects Joint Witness Statement dated 2 October 2023
 - (b) The Landscape Architect and Planning Experts Joint Witness Statement dated 3 October 2023
 - (c) And the Joint Witness Statement of Landscape Experts relating to 21.22.19 ONL Mount Alpha PA.
5. Despite conferencing I found the process was not particularly beneficial in addressing the concerns I raised in my evidence, which I understand were out of scope except with regard to the capacity rating amendments.
6. In general, my summary of evidence continues to reflect my opinion that the Mount Alpha fan should not form part of the Mount Alpha ONL for the reasons set out in my evidence with the key points summarised below.
7. While I understand the ONL boundaries are out of scope for this hearing I do not resile from my submission statement where I disagree with the ONL boundary because Mount Alpha fan should not form part of the Mount Alpha ONL PA. Mapping only assists in identifying the geographic extent of what is sought to be protected. In my opinion, the Mount Alpha fan doesn't meet the threshold tests for determining an ONL being outstandingness (i.e., obvious wow factor) or naturalness.
8. In terms of attributes and values, the fan comprises a shortened truncated segment of a fan feature being, according to Mr Leary, approximately the upper third of the fan system, which extends well beyond the Hawthenden farm for approximately 3 km along the front of Mt Alpha and for 2 km down to the shores of Lake Wanaka through the Far Horizon, Sargood Drive, Roys Bay and Meadowstone subdivisions. These developed areas of the Mount Alpha fan are also visible around Wanaka. Furthermore, I am aware that the fan doesn't represent a good example of such a feature within a district that has a large number of better examples of fan geomorphology¹, and that are more readily legible and perceived as such to a layperson.

¹ Refer Mr S Leary's Evidence, Table 1.

9. In my view, to draw a boundary that encloses only part of a landform erodes the rationale for the ONL boundary where values rely on the geomorphology of the landform. The fan has a clearly defined boundary (as the location of the alluvial fan-schist contact) with the lower Mt Alpha mountain slopes resulting from the different geomorphology and consequential land use. The lower boundary is less obvious and follows one of the terrace faces, which is the result of other geomorphological processes. This means that the fan has very different attributes and values from those associated with the broader Mt Alpha ONL. In other words, the fan lacks consistency with the Mt Alpha values and relates more strongly with the land below, which as noted above previously extended to the lake edge but is now partly developed.
10. While I generally agree with the schedule attributes, which relate to the values of the Mount Alpha mountain slopes, I find the format of the Schedule promotes unnecessary confusion between attributes and values, and particularly the accuracy of some attributes and values relating to the fan.
11. In my opinion some of the values identified as contributing to the Mount Alpha ONL are open to misinterpretation. This is particularly in relation to the '*high level of perceived naturalness, despite management of vegetation for pastoral farming*' stated under the Naturalness attributes and values heading in the Schedule. While accepting that, I question the validity of a 'high perception of naturalness' applying to the very managed pastoral landcover of the fan that clearly has a domesticated appearance indicating a high level of human influence. I suggest amending this to 'except the fan, which displays a high level of modification'.
12. The open pastoral landcover that reveals the legibility of (part of) the fan feature, the balance of which is obscured by development, is the quite clearly the result of over 100 years of farming practises associated with an historic holding and important to acknowledge. The role of past and continued management of this farmland today is a key influence on the open character and visual coherence values that obviously differ from the upper mountain slopes of Mt Alpha and contextually lies within 580m of the urban growth boundary.
13. The 'Important views and aesthetic attributes and values' appear to rely on visibility of pasture as distinct from and in contrast to the adjoining rugged mountain slopes. I find this to be fundamentally flawed because in reality views in and around Wanaka typically incorporate the rugged high country mountain slopes immediately adjoining cultivated farmland on the gently sloping slopes

and valley floors. While I accept that there are broad values relating to the views over Wanaka in general, I think that reliance on the visibility of the cultivated slopes of only a part of the Mount Alpha fan is not enough to justify the 'very high' values ascribed in the Summary of Landscape Values.

14. In my view, this overlooks the fact that some parts of the ONL (the fan and the Waterfall Creek to Damper Bay valley) have a domesticated pastoral character that is directly related to the difference in the underlying landforms and are included in the ONL without sufficient justification. To my mind this undermines the rationale for the boundary line and the protection of the relevant ONL values.
15. Most of the attributes listed for the Mt Alpha ONL relate to the mountain range and lake edge rather than the fan. The attributes relating to the fan are identified as a partial rather than intact landform, irrigated pasture and cropping land use, partial legibility, views and naturalness, which given the above do not in my opinion rank as particularly high values. This suggests that inclusion of the fan area does not meet the outstanding and natural thresholds for an ONL classification.
16. In my view these aspects and differences are significant enough to warrant the fan being identified as a Rural Character Landscape rather than an ONL.

9 November 2023

Nikki Smetham