

**Queenstown Lakes Proposed District Plan
Section 32 Evaluation Report
Variation to the Proposed District Plan**

**For:
The Upper Clutha Landscape Schedules Variation**

Report dated: May 2024

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1. Summary of the Proposed Variation

- 1.1. The purpose of the Upper Clutha Landscape Schedules Variation is to introduce one Priority Area (PA) Schedule, for the Clutha River Mata-Au, and 12 non-Priority Area Schedules, for areas within the Upper Clutha Basin. The new schedules will be included in Schedules 21.22 (1 schedule) and 21.23 (12 schedules) of Chapter 21 (Rural Zone) of the Queenstown Lakes District Council Proposed District Plan (PDP) (Upper Clutha Variation or Variation).
- 1.2. This Variation follows the Priority Area Landscape Schedules Variation to the PDP, which was notified in June 2022. The PA variation introduced 29 'Priority Area' landscape schedules to Chapter 21 (Rural Zone) and was the subject of Council decisions on 6 June 2024. The intention is that the PA and non-PA schedules proposed for inclusion in the PDP through this Variation will sit alongside the PA schedules confirmed by Council's 6 June 2024 decisions. The two variations are therefore distinct, and do not overlap, despite the approach taken to developing this Variation drawing on the earlier Variation, where relevant.
- 1.3. The objective of the Upper Clutha Landscape Schedules Variation is to:
 - a. implement the requirements of the PDP relating to PAs, through the introduction of a landscape schedule for the Mata-au Clutha River; and
 - b. better achieve the objectives and policies of Chapters 3 (Strategic Direction) and 6 (Landscapes – Rural Character) by providing detailed descriptions of the values to be maintained or enhanced for Upper Clutha RCLs that are not PAs.
- 1.4. The landscape schedules provide written material that assists to identify attributes, character, values, and capacity of an area. The landscape schedules will assist the Council and plan users with evaluating the appropriateness or otherwise of resource consent and plan change proposals within the extent of the mapped schedule areas.
- 1.5. The additional landscape schedules proposed to be introduced as part of this Upper Clutha Variation apply to the following areas:
 - a. Outstanding Natural Feature:
 - Mata-Au Clutha River (Priority Area)
 - b. Rural Character Landscapes (non-Priority Areas):
 - Mount Aspiring Road
 - Studholme Road
 - Riverbank Road
 - Wānaka Airport Environs
 - Northern End of Criffel / Pisa Range Foothills
 - Luggate
 - Sheepskin Creek
 - Kane Road and Luggate Tarras Highway

- Hāwea Moraine
- Hāwea Terrace
- Crosshill
- Quartz Creek and Maungawera

- 1.6. The Variation also includes an amendment to Strategic Policy (SP) 3.3.36 of Chapter 3 of the PDP (Strategic Directions) to include reference to the Mata-au Clutha River PA.
- 1.7. The Variation also amends the preamble to Schedule 21.23 to recognise that Schedule 21.23 includes both PA RCLs and non-PA RCLs.
- 1.8. The Variation is accompanied by maps, which are to be incorporated by reference, that depict the extent of the areas covered by each of the additional landscape schedules. The mapping of the Mata-au Clutha River PA has been confirmed by the Environment Court, following a section 293 process that involved landscape expert input,¹ and is not within the scope of this Variation.
- 1.9. The accompanying maps for the non-PA RCL landscape schedules are to be incorporated into the PDP by reference and have been consulted on separately, in accordance with the requirements of Clause 34 of Schedule 1 of the Resource Management Act 1991.

1 2022 NZEnvC 198 and [2022] NZEnvC 244.

2. Introduction

Purpose of the report

- 2.1. This report fulfils the requirements of Section 32 of the Resource Management Act 1991 (the Act or RMA). Section 32 of the Act requires the objective(s) of proposals to be examined for their appropriateness in achieving the purpose of the Act, and the policies and methods of those proposals to be examined for their costs, benefits, efficiency, effectiveness, and risk in achieving the objectives. This report should be read together with the text of the proposed landscape schedules and amendment to SP 3.3.36 of Chapter 3 Strategic Direction.

Background

- 2.2. As noted above, this Variation follows the 'Priority Area Landscape Schedules Variation' to the PDP, which was subject to submissions and a decision of the Council on 6 June 2024.
- 2.3. The Priority Area Landscape Schedules Variation introduced landscape schedules for 24 PAs within Outstanding Natural Landscapes and Features (ONL/F) and 5 PAs within Rural Character Landscapes (RCLs) in order to give effect to the strategic objectives and policies in Chapter 3 of the PDP.
- 2.4. The Priority Area Landscape Schedules Variation was prepared to implement Strategic Policy (SP) 3.3.42, which required the Council to notify a plan change to implement the following:
- a. SP 3.3.36 (identify specified Rural Zone PAs within the ONFs and ONLs in Schedule 21.22);
 - b. SP 3.3.37 (describe the landscape attributes, landscape values and related landscape capacity for subdivision use and development activities);
 - c. SP 3.3.39 (identify specified Rural Zone PAs within the Upper Clutha RCLs in Schedule 21.23); and
 - d. SP 3.3.40 (describe the landscape attributes, landscape character and visual amenity values and related landscape capacity for subdivision use and development activities).
- 2.5. The above SPs were introduced into the PDP by the Environment Court². The Environment Court's decision was the result of appeals on Stage 1 of the District Plan Review relating to the management of landscapes in the Rural Zone.
- 2.6. In summary, the Environment Court decided that requiring the protection of the landscape values of ONL/Fs, and the maintenance of landscape character and the maintenance or enhancement of visual amenity values of RCLs, without specifying what those values were, did not provide enough certainty to ensure the policy direction of the PDP (and in turn sections 6 and 7 of the Act) was achieved. The Environment Court therefore directed that the landscape

² Commencing with [2019] NZEnvC 205.

values of ONF/Ls, and the landscape character and visual amenity values of RCLs, should be identified and included in schedules in the PDP.

- 2.7. The Environment Court acknowledged that it would be a significant undertaking to identify the values of all of the landscape because 97% of the District is classified as ONF/L. Rather, the Court went through a process with the landscape architects and planners involved in the hearing and identified the 29 PA landscapes to be included in the schedules first. A number of criteria were considered, with one of the key criteria being where development pressure may be more likely, which may in turn result in cumulative effects on these landscapes.
- 2.8. The Upper Clutha Landscape Schedules Variation proposes to amend the PDP by:
- a. Introducing additional landscape schedules for one PA, and 12 non-PA RCLs to Schedules 21.22 and 21.23 to Chapter 21 (Rural Zone);
 - b. Amending Strategic Policy 3.3.36 of Chapter 3 (Strategic Directions) to include reference to Mata-au Clutha River PA;
 - c. Amending the pre-ambule to Schedule 21.23 to remove reference to 'Priority Areas'/PAs and refer to RCLs more generally to recognise that schedule 21.23 includes PAs and non-PA areas; and
 - d. Confirm the mapping identifying 12 non-PA RCLs in the Upper Clutha basin, and incorporate the mapping by reference into the PDP (using the same approach as with the PA mapping).
- 2.9. It was originally intended that all RCLs (both PA and non-PA) would be included as part of the Priority Area Landscapes Variation. However, the Council was required to notify the Variation by a specific date, and further time was required to ensure that identification and description of landscape values for the remaining non-priority areas of the Upper Clutha was undertaken in a robust way.
- 2.10. The landscape schedules have been prepared using the same methodology that was used for the PAs, as described in Chapter 3 of the PDP. This relates to the Values Identification Framework (VIF) specified in policies SP 3.3.36 to 3.3.38 (for ONL/Fs), SP 3.3.39 to 3.3.40 (RCLs) and SP 3.3.41 (both ONL/Fs and RCLs).

Mata-au Clutha River Priority Area

- 2.11. The Mata-au Clutha River PA was originally intended to be notified as part of the Priority Area Landscapes Variation. However, Council was directed to amend the PDP maps to categorise Mata-au Clutha River as an ONF (not an ONL) and to amend the ONF boundary so that it reflected the escarpments on either side of the river³.

3 [2022] NZEnvC 244.

- 2.12. This work was directed at the same time as the Priority Area Landscapes Variation and was not completed by the time the schedules were notified (as directed by SP 3.3.42). This led to delays in finalising the boundaries for the Mata-au Clutha River PA, which meant that it could not be notified with the other PAs, and would instead be notified as part of the Upper Clutha Variation.

3. Issue Definition / Resource Management Issues

- 3.1. This Variation relates to strategic issues 2 and 4 in Chapter 3 Strategic Directions of the PDP. These are set out below:

- *Strategic Issue 2:*
 - *Strategic Issue 2: Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscapes, particularly its outstanding natural features and outstanding natural landscapes.*
- *Strategic Issue 4:*
 - *Some resources of the District's natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District's economy.*

- 3.2. The Environment Court⁴ has previously identified that it is difficult to protect the landscape values of ONL/Fs, and maintain the landscape character, and maintain or enhance visual amenity values of RCLs without first identifying those values.

- 3.3. By outlining the values to be protected for ONL/Fs, and the visual amenity values to be maintained or enhanced for RCLs, it provides more certainty to achieve the policy direction. It is also more efficient and effective to identify these values at the district plan level rather than leave the identification of these values to a case-by-case assessment via individual resource consent applications.

- 3.4. Further, listing the additional RCLs would result in a more consistent approach to maintaining and enhancing landscapes across the Upper Clutha Basin (i.e., consistency with the RCL PAs) and how these values are considered within a particular RCL.

⁴ [2019] NZEnvC 160.

4. Development of the Variation

Community/Stakeholder Engagement

- 4.1. The Council consulted on non-PA RCLs as part of the Priority Area Landscapes consultation, and then again as part of a separate consultation process for the Upper Clutha Landscapes that are now being considered in this variation.
- 4.2. The purpose of both consultations was to gather the community's perspective on the values associated with landscapes of the Upper Clutha. This feedback was then used to help inform the values and attributes that accompany each of the landscape schedules. The feedback sought was on what values were associated with each of these landscape areas.
- 4.3. The first round of consultation was undertaken via the Council's Let's Talk page from the 9th of March 2022 to the 3rd of April 2022. Feedback was sought on 29 PAs, but also on the non-PA RCLs which were classified as 'all other Upper Clutha RCL areas'. The online consultation received eight responses relating to non-PA RCLs, with all other responses relating to identified PAs (although none were specific to the Mata-au Clutha River PA).
- 4.4. On the 4th of July 2023, the Council hosted a community drop-in session for members of the public to speak with Council staff about the values they associated with the non-PA RCLs and the and the Mata-au Clutha River PA. No specific questions were asked, but mapped areas were provided for each of the areas and the community invite to provide comments on the values they associated with each landscape. Over the course of the evening several people attended the session. While some provided feedback, others sought general information about the intended approach for mapping and identifying the values of RCLs.
- 4.5. An online consultation for the Upper Clutha Landscape Schedules was undertaken between the 22nd of June 2023 and the 6th of August 2023 via the Council's Let's Talk page. The community were again invited to provide comment on the values of non-PA RCLs and Mata-au Clutha River PA via the Council's Let's Talk page.
- 4.6. A total of 13 people provided feedback on the landscape areas during both the online consultation and drop-in session. These have been categorised into broad themes which are summarised in the table below:

Table 1: Summary of comments received for consultation undertaken as part of the Upper Clutha Landscapes Variation

Theme	Summary of comments received
Scenery and Landscape Values	Comments seeking protection of important scenic views or landscape values which were both specific to landscape areas or more general comments relating to the Upper Clutha area.
Management of Development	Comments seeking management of development or further development controls to protect important landscape values.

Methodology	Comments relating to the methodology of preparing the schedules (i.e., seeking that the VIF be used for non-PAs), and opposing the consultation methods and information used.
Protection of Waterbodies	Comments seeking protection of water bodies and riparian margins.
Rural Values	Comments seeking protection of high-quality soils. Acknowledgement of other features of the rural environment such as shelter belts, and outbuildings in the landscape
Other	Comment relating to rural living (and the need to provide for low density residential in the schedules) and a request for a specific area to be classified as an ONF.

4.7. The feedback provided through consultation (where relevant) was then used by the landscape team to help inform the content of the draft schedules to be notified. The summaries of the feedback received are set out in Appendix C2.

Consultation with Iwi Authorities

4.8. Clause 3(1)(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan. Council has engaged with Kai Tahu via their representatives (Aukaha and Te Ao Marama) as part of the development of this variation.

4.9. This engagement included a hui attended by Rūnaka, Aukaha, the QLDC Policy Team, and a member of the Landscape Project Team. This was not specific to the Upper Clutha Landscapes Variation, but the landscape schedules project in general. Further, iwi were provided with copies of the draft RCL schedules for comment and inclusion of values.

4.10. The landscape schedules include statements of values from mana whenua. Feedback from local iwi identified that the rating of values is problematic from a mana whenua perspective where all aspects of the natural world are interconnected. Policy 3.3.38 and Policy 3.3.41 direct the rating of attributes and so ratings have been applied within the landscape schedules. However, ratings have not been applied to mana whenua values.

4.11. It is noted that Ngāi Tahu ki Murihiku have contributed to the schedules through collaboration with Kāi Tahu ki Otago. The principles and extent of their collaboration is set out in the statement below.

Āpiti Hono Tātai Hono – Ngāi Tahu ki Murihiku Assessment Methodology

4.12. Ngāi Tahu ki Murihiku deem all landscape to be significant, given that in Te Ao Māori, whakapapa and whenua are intertwined. The question is not how significant is a landscape, but what is held within that landscape. To answer that question consideration is needed of whakapapa, mana, kawa, tikanga and mātauranga alongside identity, connections, practices,

history, and future aspirations. These considerations are the context within which to determine what is appropriate for that landscape and to describe the relationships held with the whenua.

- 4.13. As part of identifying and describing what 'cultural landscape' is to Ngāi Tahu ki Murihiku - Āpiti Hono Tātai Hono was developed⁵. This methodology curates an intrinsic assessment process, focusing on the interwoven relationship between Ira Atua and Ira Tangata and the continuum of time and whakapapa and authentically expresses the philosophies and paradigms of Ngāi Tahu ki Murihiku. Stage 1 of this assessment study which expresses the methodology was endorsed by Ngāi Tahu ki Murihiku and the Te Ao Marama board in January 2022.
- 4.14. Ngāi Tahu ki Murihiku contributed to the schedules by collaborating with Ngāi Tahu ki Otago to insert key references to values and relationships that are held across all landscape. This was in part to point to deeper, broader and more authentic expression of relationship that Ngāi Tahu ki Murihiku have expressed through the Āpiti Hono Tātai Hono methodology.

Consultation with Statutory Bodies

- 4.15. Clause 3(1) of the First Schedule of the RMA also requires local authorities to consult with:
- a. the Minister for the Environment;
 - b. those other Ministers of the Crown who may be affected by the policy statement or plan;
 - c. local authorities who may also be affected; and
 - d. any customary marine title group in the area, that may be affected by changes made to the District Plan.
- 4.16. The above consultation has been undertaken where required. The Minister for the Environment was invited to provide feedback, but no response was received. No other Ministers of the Crown were determined to be affected.
- 4.17. Consultation was undertaken with Central Otago District Council as a neighbouring local authority of the Upper Clutha, but it was determined that they were not affected by the Variation. No other territorial authorities were determined to be affected by the Proposed Variation. Lastly, given that the Queenstown Lakes District is not located near the coastal marine area, there are no customary marine title groups that are affected.
- 4.18. Otago Regional Council (ORC) was determined to be affected by the Variation. ORC is responsible for administering the Otago Regional Policy Statement and also for operating

⁵ Āpiti Hono Tātai Hono: Ngā Whenua o Ngāi Tahu ki Murihiku Stage 1 Southland Cultural Landscape Assessment Study

and maintaining various assets and infrastructure across the District. Table 2 below sets out the feedback received from ORC.

Table 2: Feedback from ORC on the Upper Clutha Landscapes Variation

Feedback	Comment
<p>ORC noted that they own and maintain the Albert Town Rock Buttress located within the Mata-au Clutha River landscape area.</p> <p>ORC noted that the draft landscape schedule provided did not reflect the importance of the Albert Town Rock Buttress as regionally significant infrastructure. The purpose of the Albert Town Rock Buttress is to mitigate the risk of erosion and land movement.</p> <p>ORC considered that this was not sufficiently aligned with the Proposed RPS 2021, in that it did not identify the need to balance enabling operation, maintenance, upgrade, and development of regionally significant infrastructure while balancing social economic well-being values with avoiding or minimising adverse effects to the environment.</p> <p>ORC sought provision v. (earthworks) of the landscape capacity section to be reworked to align and assist interpretation of district plan rules to give effect to the RPS.</p> <p>ORC noted that the landscape schedules otherwise gave effect to the identification requirements for ONL/Fs in the pRPS.</p> <p>ORC noted that their assessment only considered whether the identification of areas and values would achieve RPS and pRPS requirements, and not whether the provisions will protect the values identified within the schedules. Further noted that this would ultimately depend on the policy framework in the PDP.</p>	<p>The Albert Town Rock Buttress in the Mata-Au Clutha River Landscape Schedule is specifically acknowledged, and the associated works have been given the highest capacity rating, 'some capacity'.</p>

5. Methodology

- 5.1. As noted above, the Upper Clutha Landscape Schedules have been prepared using the same methodology as the Priority Area Landscape Schedules. The method used for the schedules is set out in the methodology statement included in Appendix C1 to this report.
- 5.2. Appendix C1 specifically addresses the method used for landscape capacity that is specific to the schedules. Further, the landscape schedules were amended following the Priority Area Landscape Schedules Hearing to ensure alignment between the Priority and non-PA landscape schedules.
- 5.3. As well as identifying the Priority Areas to be included in the landscape schedules, the Environment Court prescribed a Values Identification Framework (VIF) which set out in Chapter 3 of the PDP in Policies SP 3.3.36 to SP 3.3.41. The VIF has also been used in preparing the schedules that are the subject of this Variation.

- 5.4. In addition to the VIF, the policies require best practice landscape assessment methodology be used for the identification of landscape values, landscape character, and visual amenity values. This proposal has adopted best practice landscape assessment methodology through the guidance of Te Tangi a Te Manu (TTatM).
- 5.5. Landscape capacity is the ability for subdivision, use, or development to be absorbed in such a way that identified landscapes values are not compromised for ONFs and ONLs, or identified landscape character and visual amenity for RCLs.⁶ TTatM does not provide guidance on assessing landscape capacity. For the landscape schedules, a scale of some landscape capacity, limited landscape capacity, very limited landscape capacity, extremely limited landscape capacity, and extremely limited or no landscape capacity has been used to record the assessed landscape capacity.
- 5.6. The Mata-au Clutha River Landscape Schedule was prepared with the other PA landscape schedules. For the remaining non-PA RCLs, these were prepared by a landscape architect and then peer reviewed. The VIF and best practice methodologies were applied, and public consultation (discussed in further detail above) was also used to inform the content of the schedules. Mana whenua representatives provided input on mana whenua values (discussed further below). Input was also provided by experts from other related specialities listed below:
- a. Ecology;
 - b. Tourism and Recreation;
 - c. Archaeology and heritage; and
 - d. Geomorphology.

Format of the proposed landscape schedules

- 5.7. The schedules follow the same format as the PA Landscape Schedules to ensure a consistent approach to managing landscapes within the PDP.
- 5.8. The Mata-au Clutha River Landscape Schedule has been prepared in accordance with SP 3.3.38 (due to it being a PA), and sets out the following information:
- a. Identification and description of the key physical, associative and perceptual attributes that contribute to the values of the ONF that are to be protected;
 - b. Rating of the attributes identified, using a seven-point scale rating from Very Low to Very High; and
 - c. The related landscape capacity for a number of listed subdivision, use, and development activities and any others considered relevant to that area.

6 3.1B.5b

- 5.9. The same approach has been used for non-PA RCLs notified as part of this Variation.
- 5.10. The three concepts defined in 5.7 (a) to (c) are expressed through the 'three dimensional' structure of the schedules and implement the VIF and principles set out for landscape in TTatM. TTatM sets out the landscape assessment methodology adopted by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA TPO) for assessment of landscape values. A full explanation of the approach taken is set out in the Methodology Statement (Appendix C1).

Effect of Including Landscape Schedules in the PDP

- 5.11. Including the schedules within Chapter 21 of the PDP will provide greater certainty in policy direction for landscape management within the PDP. It will also help to achieve Strategic Objectives (SO) 3.2.5.2 which directs that for ONL/Fs, their values are protected, and SO 3.2.5.5 which directs that for RCLs, landscape character is maintained, and visual amenity values are maintained or enhanced.
- 5.12. The schedules provide clarity on what is sought to be maintained, or enhanced within each identified non-PA RCL schedule area, by identifying the landscape character and visual amenity values. This provides more detail to support the policy framework. The schedules provide certainty that the landscape outcomes set out in Chapter 3 of the PDP will be achieved.
- 5.13. The schedules are not linked to a particular rule(s) and they will not introduce any new type of resource consent. The consenting framework for the rural zones remains the same. Instead, the schedules will assist with the assessment of land use and subdivision resource consent applications in the landscape areas. They will clearly identify the values to be protected, maintained and/or enhanced by a proposed development that falls within RCLs or the Mata-au Clutha River.
- 5.14. The schedules intend to provide better management of cumulative effects on landscape values, via the concept of landscape capacity. Each schedule identifies the capacity of a landscape to absorb changes resulting from new subdivision and development without compromising the identified values. The pre-ambles for the landscape schedules help to guide the use of the schedules, particularly with regard to landscape capacity.
- 5.15. The schedules will be relevant for all resource consent applications located within RCLs, where the provisions in Chapter 3 and Chapter 21 direct that the schedules apply to that application.
- 5.16. The landscape schedules for non-PA RCLs standalone within the PDP and do not change or alter any other overlays, zones, or mapping notations. For example, the landscape schedules do not change how wāhi tupuna are applied through the PDP and do not affect existing Statutory Acknowledgement Areas (such as the Mata-au Clutha River). As noted throughout, the intended purpose of the schedules is to guide resource consents and plan changes.

6. Statutory Policy Context

- 6.1. The relevant requirements of the RMA, the Local Government Act 2002, the Partially Operative Regional Policy Statement, the Proposed Regional Policy Statement and the two iwi management plans that apply in the District have been given appropriate regard in the preparation of this proposal.

National Policy Statements/National Environmental Standards

- 6.2. There are two relevant National Policy Statements and one relevant National Environmental Standard for this Variation. These include the National Policy Statement for Highly Productive Land (NPS-HPL), the National Policy Statement for Electricity Transmission (NPS-ET), and the National Environmental Standards for Commercial Forestry (NES-CF).
- 6.3. Under Section 75(3)(a) the Proposed District Plan must give effect to any national policy statement. The relevant national policy statements identified are outlined below.

National Policy Statement for Highly Productive Land

- 6.1. The NPS-HPL sets out objectives and policies to protect highly productive land for productive purposes. This includes a requirement to map and identify areas of highly productive land and include these in regional policy statements and district plans. ORC has worked with QLDC to identify highly productive land within the District and the transitional mapping has identified that areas of the Upper Clutha contain highly productive land.
- 6.2. This Variation does not include any provisions that would compromise the purpose of the NPS-HPL. Further, the Variation does not introduce any new rules or standards that would change the policy approach to rural landscapes. Therefore, the landscape schedules do not create any inconsistencies with the NPS-HPL.

National Policy Statement for Electricity Transmission

- 6.3. The NPS-ET sets out objectives and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.
- 6.4. The landscape schedules provide for infrastructure that has a functional and operational need to be located within RCLs, and so it is considered that the Variation gives effect to the NPS-ET.

National Environmental Standard for Commercial Forestry

- 6.1. The NES-CF provides nationally consistent regulations to manage the environmental effects of forestry. It applies to both plantation forestry and exotic continuous-cover forests deliberately established for commercial purposes.
- 6.2. This Variation does not introduce any new rules or standards and so does not change the management of commercial forestry. The landscape schedules do not outline how commercial forestry should be managed. The schedules are a descriptive tool to help guide decision-making. Therefore, the landscape schedules do not create any inconsistencies with NES-CF.

Regional Policy Statement

- 6.3. Section 75(3)(c) of the RMA requires a district plan to give effect to any regional policy statement. Further, under Section 74(2)(i) when preparing or changing a district plan, a territorial authority is required to have regard to any proposed regional policy statement.
- 6.4. In the Otago Region, there are two regional policy statements that are relevant. This includes the Operative Otago Regional Policy Statement 2019 and the Regional Policy Statement Decisions Version (RPS-DV).
- 6.5. At the time QLDC consulted with ORC on the draft landscape schedules, the RPS-DV had not yet been notified, and the proposed Regional Policy Statement (pRPS) applied.
- 6.6. In Clause 3 consultation with ORC (outlined above) feedback was provided that noted that the wording of one landscape schedule did not sufficiently align with the pRPS to reflect the importance of the Albert Town Rock Buttress, which meets the definition for Regionally Significant Infrastructure. However, the relevant landscape schedule already specifically references this infrastructure, and provides for the associated earthworks with 'some landscape capacity' which is the highest capacity rating. It was therefore considered that this approach gave effect to the pRPS.
- 6.7. No other matters were raised by ORC in relation to the pRPS or as part of Clause 3 consultation for the Variation. An assessment against the relevant provisions of both the regional policy statements (the Operative RPS and the RPS-DV) is outlined below.

Otago Regional Policy Statement 2019

- 6.8. The Otago Regional Policy Statement 2019 (RPS) became fully operative on 4 March 2024. The RPS contains several relevant objectives, policies and methods which are relevant to the Upper Clutha Landscapes Variation.
- 6.9. Schedule 3 of the RPS sets out the criteria for identification of outstanding natural features, landscapes and seascapes, and highly valued natural features⁷ and landscapes. Further, Policy 3.2.3 of the RPS requires identification of areas and values of outstanding natural features, landscapes and seascapes using the attributes in Schedule 3. This is also a requirement of Policy 3.2.5, but for natural features, landscapes and seascapes which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding.
- 6.10. The landscape schedules have been prepared in accordance with Schedule 3 of the RPS. They outline the various biophysical, sensory, and associative attributes associated with

⁷ In the RPS, 'highly valued natural features, landscapes and seascapes are "...those which have values that are of significance under Sections 6(a) 6(c) 7(c) and 7(f) but are not 'outstanding natural features and landscapes under Section 6(b) of the RMA.'"

each specific landscape area for both the ONF and the RCLs. It is considered that as notified, the landscape schedules give effect to Policies 3.2.3 and 3.2.5, and Schedule 3 of the RPS.

- 6.11. Policy 3.2.4 of the RPS requires protection, enhancement and restoration of outstanding natural features and landscapes through a range of measures. Further, the RPS also has requirements for the maintenance and enhancement of highly valued natural features and landscapes, also through a range of measures through Policy 3.2.6.
- 6.12. The existing policy approach (i.e., approach to protecting ONL/Fs and maintaining/enhancing RCLs) in the PDP is not changed by the Variation. The PDP already requires the protection of landscape values for ONL/Fs, and the maintenance and enhancement of visual amenity values for RCLs. The landscape schedules will help to better achieve the current policy framework by outlining the values to be protected or maintained and enhanced. It is considered that the Variation gives effect to Policies 3.2.4 and 3.2.6 of the RPS.

Regional Policy Statement Decisions Version (RPS-DV)

- 6.13. On 27 March 2024 the Otago Regional Council made decisions on the freshwater and non-freshwater planning instruments of the proposed Otago Regional Policy Statement 2021. The RPS-DV includes requirements relating to outstanding natural features and landscapes. NFL-P1 of the RPS-DV requires identification of the areas and values of outstanding natural features and landscapes in accordance with Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'.
- 6.14. NFL-P2 requires that ONL/Fs are protected from inappropriate subdivision, use or development. This is to be done by avoiding exceeding the landscape capacity, maintaining the values that contribute to the natural feature or landscape being considered outstanding (even if those values are not themselves outstanding), and avoiding, remedying, or mitigating adverse effects. Lastly, the RPS-DV requires that adverse effects of infrastructure on ONL/F values are managed in accordance with specific requirements.
- 6.15. NFL-M1 sets out requirements for the identification of ONL/Fs, contains requirements to include a statement of landscape capacity and also requirements to collaborate with Kāi Tahu to identify landscapes of significance to Kāi Tahu (in accordance with tikaka). NFL-M1 also includes requirements to work across jurisdictional boundaries and to prioritise landscapes that are likely to contain ONL/Fs that will face development or growth pressure across the life of the RPS-DV.
- 6.16. NFL-M3 requires territorial authorities to prepare and amend their districts plan to control subdivision, use and development of land and the use of the surface of water bodies to protect ONL/Fs and manage wilding conifer spread. NFL-M4 encourages local authorities to consider the use of other mechanisms or incentives to assist in achieving landscape outcomes.

- 6.17. The existing policy framework already protects ONL/Fs from inappropriate subdivision, use and development and the schedules already include a statement of landscape capacity. Further, the introduction of the schedule for Mata-au Clutha River will ensure that it is clear what values of this landscape need to be protected. As noted in Section 4 of this report, Council has worked with Kāi Tahu via their iwi authorities as part of the development of the Variation. It is considered that the Variation therefore gives effect to the RPS-DV.

Iwi Management Plans

- 6.18. There are two relevant iwi management plans in the District. These are:
- a. Kai Tahu ki Otago Natural Resource Management Plan 2005;
 - b. Te Tangi a Taurira – The Cry of the People
- 6.19. The preparation of this Variation has had regard to these two documents. Further, the policy approach that has informed the objective of this proposal has been informed by these documents.

Proposed District Plan

- 6.20. The following chapters of the PDP are relevant to this Variation:
- a. Strategic Direction – Chapter 3;
 - b. Tangata Whenua - Chapter 5;
 - c. Landscape and Rural Character – Chapter 6; and
 - d. Chapter 21 – Rural Zone.
- 6.21. The relevant objectives and policies have been set out in Appendix D of this report. For completeness, all these chapters of the District Plan cover both Volume A (reviewed land) and Volume B (unreviewed land), as set out in 1.1B of the PDP.
- 6.22. As set out above, Chapter 3 directs that landscape schedules be prepared for the PAs using the VIF. This same approach has been used to prepare the non-PA RCLs.
- 6.23. Mana whenua values are an aspect of these landscapes that need to be considered. Council worked with mana whenua throughout the development of the Variation to ensure that these values were included in the landscape schedules.
- 6.24. Chapter 6 provides detail as to how the landscape (particularly outside urban settlements) will be managed in order to implement the Strategic Objectives and Policies in Chapter 3. This includes more detailed policies for landscapes and rural character.
- 6.25. As noted throughout, only a minor amendment to SP 3.3.36 (in addition to the PA and RCL landscape schedules and pre-amble amendments) is included to specifically reference the Mata-au Clutha River.

7. Scale and Significance Evaluation

- 7.1. The level of detailed analysis undertaken for the evaluation of the proposed objectives and provisions has been determined by an assessment of the scale and significance of the implementation of the proposed provisions. In making this assessment, regard has been had to the following, namely whether the proposed provisions:
- a. Result in a significant variance from the existing baseline in Chapter 3, 6 and 21 of the PDP;
 - b. Have effects on matters of national importance;
 - c. Adversely affect those with specific interests;
 - d. Involve effects that have been considered implicitly or explicitly by higher order documents;
 - e. Impose increased costs or restrictions on individuals, communities or businesses.
- 7.2. The level of detail in this evaluation report is considered to correspond to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposed Variation. In this case, the scale and significance of the proposal is considered **moderate**. This is because the proposal relates to one Outstanding Natural Feature and 12 Rural Character Landscapes. Outstanding Natural Features are matters of national importance under s6(b) of the RMA. Further, Rural Character Landscapes need to be given particular regard under s7(c) of the RMA.
- 7.3. The protection of ONL/Fs or maintenance and enhancement of RCLs is recognised as having potential for district wide effect. For example, the visitor economy may rely on the special landscapes of the District. The proposal may impact property owners, although this may be positive with the schedules providing greater clarity of what is intended through the policies that seek to protect or maintain landscape values and character.
- 7.4. The evaluation has recognised the scale and significance of the proposal through the use of a team of experts to inform the landscape schedules, and engagement with mana whenua and the community.

8. Evaluation of Proposed Objective(s)

- 8.1. Section 32(1)(a) requires an examination of the extent to which the proposed objectives of the proposal are the most appropriate way to achieve the purpose of the Act. The purpose of the Act is to promote the sustainable management of natural and physical resources, as set out in Section 5.
- 8.2. This Variation does not introduce any new plan objectives or change any existing objectives in the PDP. Therefore, in this case, the proposed objectives of the proposal are the purposes of the proposal, and an examination of the extent to which those objectives / purposes are the most appropriate way to achieve the purpose of the Act is required (as set out in s32(6)).
- 8.3. There are two parts to the assessment of the appropriateness of the objectives / purpose of this proposal. These are as follows:
- a. assessment against the strategic objectives and policies of the PDP, which themselves achieve the purpose of the Act; and
 - b. assessment in terms of its relevance, usefulness, reasonableness, and whether it will achieve sustainable management, compared to the status quo.
- 8.4. As noted above, the purpose of this Variation is to implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 of the PDP for PAs (i.e., for the Mata-Au Clutha River). Further, the purpose of this Variation is also to introduce additional landscape schedules for RCLs in the Upper Clutha to better identify the values that need to be maintained or enhanced. By specifying the values to be maintained or enhanced in the landscape schedules, the objectives and policies of the PDP are better able to be achieved.

9. Evaluation of Proposed Provisions

- 9.1. The provisions of the proposal are the amendment to SP 3.3.36, the additional landscape schedules, and the amendment to the pre-amble for schedule 21.23. These are set out in Appendix A, Appendix B1, and Appendix B2 below.
- 9.2. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objective or purpose of the proposal. This assessment must:
- a. identify other reasonably practicable options for achieving the objectives;
 - b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the proposed provisions;
 - c. summarise the reasons for deciding on the proposed provisions; and

- d. the assessment of the proposed provisions against the objectives requires an assessment against the purpose of the proposal, and also against the relevant objectives of the PDP (in accordance with s32(3)). The relevant objectives of the PDP are identified in Appendix D of this report.

10. Evaluation of Reasonably Practicable Options

10.1. Council has identified three reasonably practicable options for achieving the objectives. These are as follows:

- a. Option 1: Do not list any additional landscape schedules in the PDP;
- b. Option 2: List the Mata-au Clutha River PA in Schedule 21.22 and make associated amendments, but do not list any other additional RCLs into Schedule 21.23; and
- c. Option 3: List the Mata-Au Clutha River PA in Schedule 21.22, and the 12 additional schedules for the RCLs in Schedule 21.23, and make associated amendments.

10.2. The following table assesses how well the options achieve the objectives of the Proposal:

Table 3: Assessment of Reasonably practicable Options Against the Objectives

Objectives:	
<ul style="list-style-type: none"> • <i>To implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 of the PDP for identified Priority Area Landscapes.</i> • <i>To better achieve the landscape outcomes of the PDP relating to RCLs by identifying the visual amenity values to be maintained or enhanced and related landscape capacity in schedules.</i> 	
Option	Achieves objective?
<p>Option 1: (Status quo)</p> <p>Do not list any additional landscape schedules in the PDP.</p>	<p>It is considered that not listing any landscape schedules would not achieve the objectives, in particular for the Mata-au Clutha River.</p> <p>Not listing the landscape values to be protected, or visual amenity values to be maintained would not provide enough certainty to achieve the policy direction in the PDP.</p> <p>Further, the Mata-au Clutha River was identified as a PA and has been through a separate court process on the understanding that it would be scheduled and included in the PDP. Deciding not to notify this</p>

	<p>schedule would be inconsistent with the PA Landscape Schedules Variation or the objectives and policies in Chapter 3 relating to PAs.</p> <p>The approach would not provide more certainty in resource consent and plan change applications, and therefore would not assist with achieving the objectives of the proposal (or the other objectives and policies of the PDP).</p>
<p>Option 2: (Alternative Option)</p> <p>List the Mata-au Clutha River PA in the PDP, but do not list any RCLs into Schedule 21.23.</p>	<p>It is considered that not listing the non-PA RCL schedules would not achieve the objectives of the PDP.</p> <p>Not listing the visual amenity values to be maintained would not provide enough certainty to effectively implement the policy direction.</p> <p>Further, not listing the non-PA RCL schedules would result in an inconsistent approach to managing landscape across the Upper Clutha, with PA RCLs having landscape schedules and areas outside this not.</p> <p>Providing schedules for non-PA RCLs would provide more certainty in resource consent and plan change applications and better achieve the objectives of the PDP.</p>
<p>Option 3: (Preferred Option)</p> <p>List the Mata-au Clutha River Priority Area in Schedule 21.22 and 12 RCL Schedules in Schedule 21.23.</p>	<p>It is considered that listing both the Mata-au Clutha River PA, and the non-PA RCLs would help to achieve the objectives of the PDP and better identify the values to be protected for the or maintained and enhanced for the RCLs.</p> <p>This would also provide a more consistent approach to managing landscape in the Upper Clutha.</p>

11. Efficiency and Effectiveness

11.1. The following table considers the efficiency and effectiveness of the proposed provisions at achieving the purpose of the proposal and the objectives of the PDP. The proposed provisions include the landscape schedules for the Mata-au Clutha River PA), and the 12 additional RCLs (as set out in Appendix B2).

11.2. For ease of reference, the purpose of the proposal and the relevant objectives from the PDP are set out below:

Purpose of the Proposal *To implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 of the PDP for identified Priority Area Landscapes⁸.*

To better achieve the landscape outcomes of the PDP relating to RCLs by identifying the visual amenity values to be maintained or enhanced and related landscape capacity in schedules.

Strategic Objective 3.2.5.1 *The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related capacity are identified.*

Strategic Objective 3.2.5.7 *In Rural Character Landscapes of the Upper Clutha Basin:*

- a. Priority Areas of Rural Character Landscapes are identified; and*
- b. Associated landscape character and visual amenity values and related landscape capacity are identified.*

⁸ As noted above, the Mata-au Clutha River is a PA so these requirements are still relevant.

Table 4: Assessment of the Costs, Benefits and Efficiency and Effectiveness of Option 1 (Status quo)

Option 1: Do not list any additional landscape schedules in the PDP (Status quo)			
Costs	Benefits	Efficiency and Effectiveness	Risk of Acting/Not Acting
<p>Environmental</p> <p>Not having landscape schedules may provide less certainty that the landscape outcomes in the PDP will be achieved. Further, by not identifying the values to be protected, or maintained or enhanced, there is a risk of cumulative effects on landscapes.</p>	<p>Environmental</p> <p>There are not considered to be any environmental benefits from this option.</p>	<p>This option is not considered to be effective or efficient.</p> <p>Not identifying the landscape values to be protected, or landscape character to be maintained or enhanced, would mean that resource consent applications and plan changes in the rural environment of the Upper Clutha would need to undertake a case-by-case assessment of values to be protected and visual amenity values to be maintained or enhanced.</p> <p>It is not considered that this approach is an efficient or effective way to achieve the objective of the proposal.</p>	<p>This option would not give effect to the Environment Court which identified the Mata-au Clutha River as a PA.</p> <p>Not identifying the values to be protected, or landscape character to be maintained or enhanced may result in less certainty that the landscape outcomes of the PDP would be achieved.</p> <p>The risk of this approach is that it would not give effect to the RPS-DV which requires identification of landscape capacity for ONL/Fs.</p> <p>The risk of not acting could result in an increased risk that Council may not meet its statutory obligations under the RMA with</p>
<p>Economic</p> <p>Not having landscape schedules may increase the cost to applicants for resource consent applications as applicants will need to identify the landscape values, landscape character, or visual amenity values of a landscape.</p>	<p>Economic</p> <p>There are not considered to be any economic benefits from this option.</p>		
<p>Social</p> <p>As drafted, the landscape schedules have been informed by public feedback</p>	<p>Social</p> <p>There are not considered to be any social benefits from this option.</p>		

<p>about the values people hold in the landscapes. Not including landscape schedules would provide no certainty that these values will be protected, or maintained or enhanced.</p>			<p>regard to landscapes (i.e., s6(b) and s7(c)).</p>
<p>Cultural</p> <p>Not identifying the mana whenua values in landscape schedules does not provide certainty with regard to what mana whenua values should be protected or maintained or enhanced.</p>	<p>Cultural</p> <p>There are not considered to be any cultural benefits from this option.</p>		

Table 5: Assessment of the Costs, Benefits and Efficiency and Effectiveness of Option 2 (Alternative option)

Option 2: List the Mata-au Clutha River PA in the PDP, but do not list any RCLs into Schedule 21.23 (including amendment to SP 3.3.36 of Chapter 3 (Alternative option))			
Costs	Benefits	Efficiency and Effectiveness	Risk of Acting/Not Acting
<p>Environmental</p> <p>There is a potential risk of cumulative effects on RCLs if their visual amenity values and character of these landscapes are not identified.</p>	<p>Environmental</p> <p>The values of the Mata-au Clutha River PA that need to be protected would be identified and this may help to better achieve the objectives of the PDP relating to Outstanding Natural Landscapes and Outstanding Natural Features.</p>	<p>This option would meet the requirements of the PDP relating to PAs. However, the approach would not provide enough certainty to achieve the policy direction for RCLs.</p> <p>Not identifying the visual amenity values and character to be maintained or enhanced would mean that resource consent applications or plan changes would need to undertake a case-by-case assessment to identify these values in the Rural Zone of the Upper Clutha.</p>	<p>This approach would meet the requirements of the PDP relating to PAs.</p> <p>The risk of this approach is that the policy direction in the PDP for RCLs would not be achieved.</p>
<p>Economic</p> <p>Not having landscape schedules for RCLs could increase the cost to applicants for resource consents or plan changes as a case-by-case assessment of the visual amenity values to be maintained or enhanced would need to be undertaken.</p>	<p>Economic</p> <p>Reduced cost to applicants for activities requiring resource consent within the Mata-au Clutha River PAs as the values that need to be protected would be identified.</p>	<p>It is not considered that this approach is an efficient or effective way to achieve the objective of the proposal.</p>	

<p>Social</p> <p>As drafted, the RCL schedules have been informed by public feedback about the values people hold in the landscapes. Not including landscape schedules would provide no certainty that these values will be protected or maintained or enhanced.</p>	<p>Social</p> <p>The Mata-au Clutha River Landscape Schedule has been informed by public feedback. There is a social benefit through identification of landscape values as this schedule would provide a high level of certainty that the values people associate with this landscape would be protected. However, these benefits would be limited to the Mata-au Clutha River only.</p>		
<p>Cultural</p> <p>Not identifying the mana whenua values within RCLs does not provide certainty with regard to what mana whenua values within RCLs need to be maintained or enhanced.</p>	<p>Cultural</p> <p>This option would identify the mana whenua values within the Mata-au Clutha River PA that need to be protected. This will assist Plan-users' understanding of the mana whenua values and provide greater certainty for the resource consent processes. However, these benefits would be limited to the Mata-au Clutha River PA only.</p>		

Table 6: Assessment of the Costs, Benefits and Efficiency and Effectiveness of Option 3 (Preferred Option)

Option 3: List the Mata-Au Clutha River Priority Area in Schedule 21.22 and 12 RCL Schedules in Schedule 21.23, and amendment to SP 3.3.36 of Chapter 3(Preferred Option)			
Costs	Benefits	Efficiency and Effectiveness	Risk of Acting / Not acting
<p>Environmental</p> <p>There are not considered to be any environmental costs of the implementation of the proposal.</p>	<p>Environmental</p> <p>The inclusion of the schedules in the PDP will provide greater certainty that landscape outcomes in the PDP will be achieved. By identifying landscape values of the PA it is clear what needs to be protected. By identifying landscape character and visual amenity values of RCLs, it is clear what needs to be maintained and/or enhanced. By identifying the landscape capacity for certain activities, better management of cumulative effects can be achieved.</p>	<p>Inclusion of the schedules within Chapter 21 is an effective way to achieve the purpose of the proposal and the objectives and policies of the PDP, as the purpose and objectives specifically direct the identification of “landscape character to be maintained, and visual amenity values to be maintained or enhanced and related landscape capacity”, albeit only through the scheduling of the PA RCLs (see SP 3.3.33(a). For non-PA RCL areas, the PDP requires identification in accordance with SP 3.3.45. This Variation is proposing to build from that requirement and include schedules for all RCL areas, to better achieve the Chapter 3 policy direction and provide clarity for plan users and landowners.</p>	<p>It is considered that the information about the landscape values and related capacity identified in the landscape schedules from this option is certain and sufficient and there is no need to assess the risk of acting or not acting for this option.</p>
<p>Economic</p> <p>There are not considered to be any economic costs of the implementation of the proposal. The proposal would not amend</p>	<p>Economic</p> <p>The certainty provided by the schedules will reduce the cost to applicants for resource consent, as applicants will not need to identify the</p>		

<p>any rules in the PDP, rather it seeks to provide more certainty for how the current rules are to be applied.</p>	<p>landscape values, landscape character or visual amenity values of the landscape.</p>	<p>The methodology used is that prescribed in the policies, and the schedules identify and describe each of the criteria required to be identified and described by the policies. A</p>	
<p>Social</p> <p>There are not considered to be any social costs from the implementation of the proposal.</p>	<p>Social</p> <p>The landscape schedules were informed by public feedback about the values people hold in the landscapes. There is a social benefit through the identification of landscape values, as the schedules provide certainty that the values people in the landscape will be protected, maintained or enhanced.</p>	<p>collaboration of two landscape architects, supported by other specialists and mana whenua, ensures that the identification of landscape values and related capacity occurred in a technically appropriate manner that followed best practice and the requirements of the PDP.</p> <p>Inclusion of the schedules in Chapter 21 is an efficient way to achieve the purpose of the proposal and the objectives of the PDP because the benefits of doing this outweigh the costs.</p> <p>Overall, the schedules, including the values and related capacity that they identify, are considered to be the most appropriate way to achieve the purpose of the variation and the objectives of the PDP.</p>	

<p>Cultural</p> <p>There are not considered to be any cultural costs from the implementation of the proposal.</p>	<p>Cultural</p> <p>There is a cultural benefit through the identification of mana whenua values within the schedules (associative attributes), providing certainty for what is to be protected, maintained or enhanced.</p>		
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12. Most Appropriate Option

- 12.1. As noted above, the objectives of this Variation are:
- a. *To implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 (Rural Zone) for identified Priority Areas; and*
 - b. *To better achieve the landscape outcomes of the PDP relating to RCLs by identifying the visual amenity values to be maintained or enhanced and related landscape capacity in schedules.*
- 12.2. In achieving the objectives of the Variation, three Options have been assessed. These are:
- a. Option 1 (Status quo): Do not list any additional landscape schedules in the PDP;
 - b. Option 2 (Alternative): List the Mata-au Clutha River PA in Schedule 21.22, amend SP 3.3.36, but do not list any other RCLs in Schedule 21.23; and
 - c. Option 3 (Preferred): List the Mata-au Clutha River PA in Schedule 21.22, amend SP 3.3.36, and the 12 additional schedules for the RCLs in Schedule 21.23.
- 12.3. The status quo option (Option 1) is not considered an appropriate option as it would not meet the objectives of the Variation. It would not implement the requirements of Chapter 3 relating to PAs and would not help to better achieve the PDP objectives relating to RCLs.
- 12.4. For Option 1, it is considered that the costs outweigh the benefits (for the reasons set out above), and that this is not an efficient or effective way to achieve the objectives of the Proposal.
- 12.5. The alternative option (Option 2) is also not considered to be an appropriate option. While it would meet the requirements of the PDP relating to PAs, limited to the Mata-au Clutha River PA, it would not provide added certainty to meet the objectives of the PDP relating to RCLs. Further, it is not considered that this option would not give effect to the RPS-DV which requires identification of landscape capacity for ONL/Fs.
- 12.6. For Option 2, it is considered that the costs outweigh the benefits (for the reasons set out above), and that this is not an efficient or effective way to achieve the objectives of the Proposal.
- 12.7. Overall, it is considered that **Option 3** is the most appropriate as it will implement the requirements for Chapter 3 (relating to PAs), and it will help to better achieve the objectives in the PDP relating to ONL/Fs and RCLs.
- 12.8. For Option 3, it is considered that the benefits outweigh the costs (for the reasons set out above), and that the Option is more efficient and effective than Option 2 and 3.

13. Conclusions

- 13.1. This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits, and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA.
- 13.2. Option 3 is considered the most appropriate way to achieve the purpose of the Act. Inclusion of additional landscape schedules in the PDP will better achieve the objectives of Chapter 3 Strategic Directions, and result in a more consistent approach to managing landscapes across the Upper Clutha.

Appendix A – Proposed Policy Change

3 Strategic Direction

Values Identification Framework for Priority Areas for Outstanding Natural Features and Outstanding Natural Landscapes

3.3.36 Identify in Schedule 21.22 the following Rural Zone Priority Areas within the Outstanding Natural Features and Outstanding Natural Landscapes shown on maps held on [QLDC reference file]:

- a. parts of the Outstanding Natural Features of Peninsula Hill, Ferry Hill, Shotover River, Morven Hill, Lake Hayes, Slope Hill, Feehly Hill, Arrow River, Kawarau River, Mt Barker, ~~and~~ Mt Iron, and Mata-au Clutha River.
- b. parts of the Outstanding Natural Landscapes of West Wakatipu Basin, Queenstown Bay and environs, Northern Remarkables, Central Wakatipu Basin Coronet Area, East Wakatipu Basin and Crown Terrace Area, Victoria Flats, Cardrona Valley, Mount Alpha, Roys Bay, West Wanaka, Dublin Bay, Hāwea South and North Grandview, and Lake McKay Station and environs.

(relevant to SO 3.2.5, 3.2.5.1)

Appendix B1 – Proposed Pre-amble 21.23

21.23 Schedule of Landscape Values: Upper Clutha Rural Character Landscape ~~Priority Areas~~ – Preamble

1. Purpose

- 1.1 Schedule 21.23 identifies and describes 5 Priority Areas (PA) Schedules that relate to Rural Character Landscapes (RCL)¹. It also identifies and describes 12 other non-PA Schedules that relate to RCLs. These 17 areas are collectively referred to as 'Schedules' within 21.23.
- 1.2 The PA Schedules are a tool to assist with the identification of the landscape values that are to be protected within each PA Scheduled area and related landscape capacity. They contain both factual information and evaluative content and are to inform plan development and plan implementation processes and assist technical landscape assessment.
- 1.3 The description of each PA Scheduled area must be read in full. Each description, as a whole, expresses at a PA 'Schedule area' scale, the landscape values and the attributes from which those values derive.

2. Application

- 2.1 The PA ~~s~~Schedules have been prepared to reflect that in some cases the PA Schedule area mapping extends beyond the Rural Zone. The application of the PA Schedules to resource consents is as follows:
- 2.1.1 The PA Schedules apply to any proposal requiring resource consent for a restricted discretionary, discretionary or non-complying activity² in the Rural Zone, including the Rural Industrial Sub Zone.
- 2.1.2 The PA Schedules do not apply to proposals requiring resource consent in any other zones, including Exception Zones³. They may inform landscape assessments for proposals involving any land within a PA Scheduled area but are not required to be considered.
- 2.2 The PA Schedules will be used where relevant for any plan development proposal.

3. Landscape Attributes and Values

- 3.1 The landscape attributes and values identified, are based on an assessment of the PA Scheduled area as a whole and are not intended to describe the relevant attributes and values of specific sites within the PA Scheduled area. The ~~s~~Schedules ~~for each PA~~ set out the 'key' attributes and values, summarised from a wide range of information sources and knowledge about the landscape.
- 3.2 Given the Schedule area PA-scale of the landscape assessment underpinning the PA ~~s~~Schedules, a finer grain proposal-specific assessment of landscape attributes and values will typically be required for plan development or plan implementation purposes (including plan changes or resource consent applications)⁴. Through any proposal-specific assessment, additional landscape values may be identified that are not

¹ Refer to Strategic Policies 3.3.39, 3.3.40 and 3.3.41

² Refer to Strategic Policy 3.3.46

³ Refer to Chapter 3 part 3.1B.5.a

⁴ Refer to Strategic Policy 3.3.43 and Strategic Policy 3.3.45

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recorded in the ~~PA~~ Schedules. The ~~PA~~ Schedules represent a point in time and are not intended to provide a complete record.

- 3.3 The ~~PA~~ Schedules include attributes⁵ that contribute positively to landscape values, attributes that detract from landscape values, and attributes that are neutral with respect to informing landscape values.
- 3.4 The reference to 'Other distinctive vegetation types' and the 'Land use and patterns and features' in the ~~PA~~ Schedules do not relate to attributes or landscape values that need to be protected. Rather, these are attributes that influence landscape values (and landscape capacity). Reference to these existing attributes is not intended to 'lock in' existing land uses.
- 3.5 The reference to 'Plant and Animal Pests' corresponds to attributes that detract from landscape values. Pest information is included at the end of the landscape capacity section of each ~~PA~~ Schedule. Few, if any of the District's RCLs are pristine and there are varying levels of modification evident (including plant and animal pests). This means that landscape restoration and enhancement (which can include the management of pests) is a highly desirable outcome. The reference to plant and animal pests is intended to guide appropriate future landscape management within the Scheduled area ~~PA~~. For example, where a resource consent or plan change is proposed within the Scheduled area ~~PA~~ the proposal or provisions may seek to specifically address the management of pests).
- 3.6 With respect to the link between the ~~PA-RCL~~ Schedules and Strategic Policies 3.2.5.5, 3.2.5.7, and 3.3.41, landscape character and visual amenity values are expressed through the 'three dimensioned' construct of landscape values set out in the ~~PA-RCL~~ Schedules (i.e. physical, associative and perceptual / sensory). The concept of 'landscape character' encompasses all three dimensions of landscape values. 'Visual amenity values' typically draw from the perceptual dimension, however there is inevitably an overlap with the physical dimension.
- 3.7 The key public routes and viewpoints are typically identified in the description of the 'Land use patterns and features', with key scenic routes identified under 'Recreation attributes and values' and/or 'Particularly important views to and from the area'.
- 3.8 The relationship between the ~~PA~~ Scheduled RCL areas and the wider RCL context, the Outstanding Natural Features within the Upper Clutha Basin and the Outstanding Natural Landscapes that frame the Upper Clutha Basin are typically addressed in the description of 'Land use patterns and features', 'Shared and recognised attributes and values', 'Particularly important views to and from the area', and 'Aesthetic qualities and values'.

4. Landscape Capacity

- 4.1 The landscape capacity ratings used in the ~~PA~~ Schedules, which are described below, are intended to reflect the capacity of the landscape or feature to accommodate various types or forms of development, without compromising the identified landscape values. The definition of landscape capacity applied in the ~~PA~~ Schedules is set out at Chapter 3 part 3.1B.5b.ii.
- 4.2 The capacity ratings, and associated descriptions, are based on an assessment of each Scheduled area ~~PA~~ as a whole, and are not intended to describe the relevant capacity of specific sites within a Scheduled area ~~PA~~. The ratings of landscape capacity do not apply to activities within any Exception Zone⁶ that is located within a Scheduled area ~~PA~~.
- 4.3 The landscape capacity ratings and qualifying comments in the ~~PA~~ Schedules are 'high level' and focus on describing potential outcomes that would likely be appropriate within each Scheduled area ~~PA~~. These

⁵ The identification of an attribute in the ~~PA~~ Sschedule is not confirmation or otherwise as to whether the attribute has been legally established.

⁶ Refer to Chapter 3 part 3.1B.5(a)

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descriptions are not a replacement for any relevant policies, rules or standards in the District Plan, and are intended to provide guidance only.

4.4 Landscape capacity is not a fixed concept and it may change over time as development occurs or landscape characteristics change. In addition, across each Scheduled area 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.

4.5 For the purposes of the ~~PA~~ Schedules, landscape capacity is described using the following five terms:

Some landscape capacity: typically this corresponds to a situation in which a careful or measured amount of some sensitively located and designed development of this type is unlikely to materially compromise the identified landscape values.

Limited landscape capacity: typically this corresponds to a situation in which the landscape is near its capacity to accommodate development of this type without material compromise of its identified landscape values and where only a limited amount of sensitively located and designed development is unlikely to materially compromise the identified landscape values.

Very limited landscape capacity: typically this corresponds to a situation in which the landscape is very close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only a very limited amount of sensitively located and designed development is likely to be appropriate.

Extremely limited landscape capacity: typically this corresponds to a situation in which the landscape is extremely close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only an extremely limited amount of very sensitively located and designed development is likely to be appropriate.

Extremely limited or no capacity: typically this corresponds to a situation in which the landscape is extremely close to, or already at, capacity to accommodate development of this type without material compromise of its identified landscape values, and where either no, or an extremely limited amount of very sensitively located and designed development is likely to be appropriate.

4.6 It is intended that the use of this five-tier landscape capacity terminology, along with a description of the characteristics that are likely to frame development that is appropriate (from a landscape perspective), and the description of the landscape attributes and values of the Scheduled area PA will assist in providing high level guidance with respect to the scale, location and characteristics of each land use type that will maintain and/or enhance landscape values in each Scheduled area PA that relate to RCLs.

5. **Meaning of activities for the purpose of the ~~PA~~ Schedules**

5.1 For the purpose of the ~~PA~~ Schedules, activities listed have the following meanings:

- **Commercial recreational activities:** has the same meaning as Chapter 2
- **Visitor accommodation:** has the same meaning as Chapter 2
- **Tourism related activities:** has the same meaning as Resort in Chapter 2.
- **Urban expansions means:**
 - a change from a rural activity to urban development; or
 - a change (including any proposed change) in zoning to an urban zone, including any change to the urban growth boundary or any other zone changes (or proposed changes) that would provide for urban development.
- **Intensive agriculture:** has the same meaning as Factory Farming in Chapter 2.
- **Earthworks:** has the same meaning as Chapter 2

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- **Farm buildings:** has the same meaning as Chapter 2
- **Mineral extraction:** has the same meaning as Mining Activity in Chapter 2.
- **Transport infrastructure:** has the same meaning as Chapter 2
- **Utilities:** has the same meaning as Chapter 2
- **Regionally significant infrastructure:** has the same meaning as Chapter 2
- **Farm scale quarries:** means mining of aggregate for farming activities on the same site.
- **Renewable energy generation:** has the same meaning as Renewable Electricity Generation and Renewable Electricity Generation Activities in Chapter 2.
- **Forestry:** has the same meaning as Forestry Activity in Chapter 2.
- **Rural living:** has the same meaning as rural living in Chapter 3 section 3.1B.5.
- **Rural industrial activities:** has the same meaning as Chapter 2.
- **Passenger lift systems:** has the same meaning as Chapter 2 except that for the purposes of the ~~PA~~ Schedules it includes base and terminal buildings and stations.
- **Jetties, lake structures, moorings, boat sheds:** have their plain meaning (and may be used interchangeably).

5.2 The range of land use activities addressed in the capacity section of the ~~PA~~ Schedules includes the activities prescribed by SP 3.3.41. It is acknowledged that this does not span the full array of land use activities that may be contemplated in the Scheduled areas ~~PA~~s over time. In the case of a future application for a land use activity that is not addressed in a ~~PA~~ Schedule, an assessment applying the principles set out in 3.3.43, 3.3.45 and 3.3.46 is required.

Appendix B2 – Landscape Schedules: **Saved separately**

Appendix C1 – Methodology Report:

UPPER CLUTHA 21.23 SCHEDULES AND MATA- AU CLUTHA RIVER PA SCHEDULE 21.22.25

Methodology Report

Final

May 2024

Prepared for Queenstown Lakes District Council by

bridget**gilbert**
l a n d s c a p e a r c h i t e c t u r e

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Appendices

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1.0 Introduction

- 1.1 The following Upper Clutha 21.23 Schedules and Mata-au Clutha River Priority Area (**PA**) Schedule 21.22.25 Methodology Report (collectively referred to as the **Upper Clutha Schedules**) has been prepared by Bridget Gilbert Landscape Architecture Limited (**BGLA**) and peer reviewed by Helen Mellsop Landscape Architect for Queenstown Lakes District Council.
- 1.2 The preparation of Upper Clutha Schedules relates to RCL land in the Upper Clutha Basin that is outside the mapped Priority Areas that were confirmed by a series of decisions from the Environment Court. This parcel of work also addresses a Schedule of Landscape Values for the Matau-au Clutha River PA.
- 1.3 BGLA and Helen Mellsop co-authored the notified version of the Priority Area Landscape Schedules, with BGLA providing ongoing expert advice to QLDC during the Priority Area Landscape Schedules Variation hearing process.

Upper Clutha 21.23 Schedules

- 1.4 It was originally intended that all RCLs (both Priority Area and non-Priority Area) would be included as part of the Priority Area Landscapes Variation. However, the Council was required to notify the Variation by a specific date, and further time was required to ensure that identification and description of landscape values for the remaining areas of the Upper Clutha was undertaken in a robust way.
- 1.5 Although the areas of RCL addressed in this workstream are not specifically addressed in Chapter 3 of the Proposed District Plan (**PDP**) in the way that the Priority Areas are, a consistent approach to the evaluation of landscape values and landscape capacity to that required for the PA RCL areas of the district has been applied, as outlined in the following sections of the PDP.

PDP Chapter 3 Values Identification Framework for Rural Character Landscapes

3.3.40 For the Priority Areas listed in 3.3, according to SP 3.3.41, describe in Schedule 21.23 at an appropriate landscape scale:

- a. the landscape attributes (physical, sensory and associative);
- b. the landscape character and visual amenity values; and
- c. the related landscape capacity.

(relevant to SO 3.2.5, 3.2.5.7)

3.3.41 To achieve SP 3.3.40 for each Priority Area:

- a. identify and describe key public routes and viewpoints both within and in proximity to the Priority Areas (including waterbodies, roads, walkways and cycleways);
- b. identify the key physical, sensory and associative attributes that contribute to the landscape character and visual amenity values of the Priority Area;
- c. describe in accordance with SP 3.3.43, and then rate, those attributes;
- d. assess and record the relationship between the Priority Area and the wider Rural Character Landscape context;
- e. assess and record the relationship between the Priority Area and the Outstanding Natural Features within the Upper Clutha Basin;
- f. assess and record the relationship between the Priority Area and the Outstanding Natural Landscapes that frame the Upper Clutha Basin; and

g. assess and record the related landscape capacity for subdivision, use and development activities including but not limited to:

- i. commercial recreational activities;
- ii. visitor accommodation and tourism related activities;
- iii. urban expansions;
- iv. intensive agriculture;
- v. earthworks;
- vi. farm buildings;
- vii. mineral extraction;
- viii. transport infrastructure;
- ix. utilities and regionally significant infrastructure;
- x. renewable energy generation;
- xi. forestry;
- xii. rural living.

(relevant to SO 3.2.5, 3.2.5.7)

3.3.43 In applying the Strategic Objectives and Strategic Policies for Outstanding Natural Features, Outstanding Natural Landscapes and Rural Character Landscapes, including the values identification frameworks in SP 3.3.37, 3.3.38, 3.3.40 and 3.3.41 and the landscape assessment methodology in SP 3.3.45, have regard to the following attributes:

- a. Physical attributes:
 - i. geology, geomorphology and topography;
 - ii. ecology;
 - iii. vegetation cover (exotic and indigenous);
 - iv. the presence of waterbodies including lakes, rivers, streams, wetlands, and their hydrology;
 - v. land use (including settlements, buildings and structures); and
- b. Sensory (or experiential) attributes:
 - i. legibility or expressiveness – how obviously the feature or landscape demonstrates its formative processes;
 - ii. aesthetic values including memorability and naturalness;
 - iii. wild or scenic values;
 - iv. transient values including values at certain times of the day or year; and
- c. Associative attributes:
 - i. whether the attributes identified in (a) and (b) are shared and recognised;
 - ii. cultural and spiritual values for Tangata Whenua;
 - iii. historical and heritage associations;
 - iv. recreational values.

(relevant to SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.2, 3.2.2.1, 3.2.5, 3.2.5.1 – 3.2.5.7)

1.6 The Upper Clutha Schedule 21.23 areas are as follows:

6. East of Wānaka – Mount Aspiring Road.

7. Studholme Road.

8. Riverbank Road.
 9. Wānaka Airport Environs.
 10. Northern End of Criffel and Pisa Range Foothills.
 11. East of Luggate.
 12. Sheepskin Creek.
 13. Kane Road and Luggate – Tarras Highway.
 14. Hāwea Moraine.
 15. Hāwea Terrace.
 16. Crosshill.
 17. Quartz Creek and Maungawera.
- 1.7 The spatial extent (boundaries) of the Upper Clutha Schedule 21.23 areas is shown in the QLDC GIS mapping resource and are incorporated by reference.
- 1.8 The delineation of the Upper Clutha 21.23 Schedule areas was defined by BGLA and Helen Mellsop. In many instances, the extent of the mapped areas is determined by the surrounding zoning patterns and / or confirmed boundaries of RCL PAs or ONL / ONF. This means that the Schedule area forms a discrete 'pocket' of Rural Character Landscape (**RCL**) (e.g. 21.23.6, 21.23.7, 21.23.8, 21.23.9, 21.23.10, 21.23.11, 21.23.12, 21.23.16 and 21.23.17).
- 1.9 In the case of the Upper Clutha 21.23 Schedule areas on the eastern side of the Hāwea River and Mata-au (Clutha River), landform patterning has informed the 'internal' delineation of 21.23.13, 21.23.14 and 21.23.15 (i.e. the configuration of the boundaries between Upper Clutha 21.23 Schedule areas). It is acknowledged that the absence of detailed contour information in this part of the District has made this difficult in places (and in particular, in relation to the northern and southern edges of 21.23.14 Hāwea Moraine).
- 1.10 It is noted that the Upper Clutha 21.23 Schedules workstream is not required to address the merits or otherwise of the general RCL spatial mapping itself, as this has been confirmed through the Queenstown Lakes District Plan Review process.
- 1.11 Further, the mapped extent of an Upper Clutha 21.23 Schedule area is not a 'landscape' in its own right, and typically forms part of a broader landscape.

Mata-au Clutha River PA

- 1.12 The Mata-au Clutha River PA was originally intended to be notified as part of the Priority Area Landscapes Variation. However, Council was directed to amend the PDP maps to categorise Mata-au Clutha River as an Outstanding Natural Feature (**ONF**) (not an Outstanding Natural Landscape) and to amend the ONF boundary so that it reflected the escarpments on either side of the river.¹
- 1.13 This work was directed at the same time as the Priority Area Landscapes Variation and was not completed by the time the schedules were notified (as directed by SP 3.3.42). This led to delays in finalising the Priority Area which meant that it could not be notified with the others and would instead be notified as part of the Upper Clutha Landscape Schedules Variation.

¹ [2022] NZEnvC 244

- 1.14 The sections of the PDP Chapter 3 highlighted in paragraph 1.5 above have guided the evaluation of landscape values and landscape capacity for 21.22.25 Mata-au Clutha River.

Relevant PDP Chapter 3 Definitions

- 1.15 To assist plan users, the Chapter 3 text also includes a number of definitions that are of relevance to the preparation of the Upper Clutha 21.23 Schedules and Mata-au Clutha River PA Schedule 21.22.25.

3.1B.7 In this Chapter:

- a. '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 while maintaining its identified visual amenity values;
- b. 'Landscape values' in relation to any Outstanding Natural Feature, Outstanding Natural Landscape or Rural Character Landscape includes biophysical, sensory and associative attributes (and 'values' has a corresponding meaning);
- c. 'Rural Living' means residential-type development in a Rural Character Landscape or on an Outstanding Natural Feature or in an Outstanding Natural Landscape, including of the nature anticipated in a Rural Residential or Rural Lifestyle zone but excluding residential development for farming or other rural production activities;
- d. 'Priority Area':
 - i. in relation to an Outstanding Natural Feature or Outstanding Natural Landscape, means an area listed in SP 3.3.36 and shown on the maps [held on [QLDC reference file]];
 - ii. in relation to the Upper Clutha Rural Character Landscape, means an area listed in SP 3.3.39 and shown on the maps [held on [QLDC reference file]].
- e. 'Best practice landscape methodology' in relation to the identification of landscape values or related landscape capacity or their assessment includes a methodology produced or recommended by a reputable professional body for landscape architects.

- 1.16 The Mata-au Clutha River PA Schedule 21.22.25 workstream is not required to address the merits or otherwise of the PA 'overlay' spatial mapping itself, as this has been confirmed through the Environment Court.

- 1.17 Further, the mapped extent of Mata-au Clutha River PA Schedule 21.22.25 is not necessarily a 'landscape' in its own right, and typically forms part of a broader landscape.

Relationship of the current workstream with the PA Landscape Schedules Variation process

- 1.18 The Upper Clutha 21.23 Schedules and Mata-au Clutha River PA Schedule 21.22.25 workstream has been progressed after the completion of the PA Landscape Schedules Variation hearing process. This has allowed the Schedules that are the subject of this methodology report to integrate the relevant 'amendments' agreed in expert conferencing along with amendments recommended by the Panel. Put another way, the drafting of the Upper Clutha 21.23 Schedules and Mata-au Clutha River PA Schedule 21.22.25 'builds' on the learnings and outcomes of the PA Landscape Schedules Variation process.

RCL areas in the Upper Clutha Basin that are not addressed in the current workstream

- 1.19 There are a small number of RCL areas in the Upper Clutha Basin that have not been addressed in the PA Landscape Schedules Variation or the current workstream.
- 1.20 A Schedule has not been prepared for the fragments of RCL land surrounded by urban zoned land in Wānaka, around the edges of Mount Iron PA (ONF), along the margins of Orau (Cardrona River) and between the urban edge and Mata-au (Clutha River) PA (ONF) adjacent Outlet Road and Aubrey Road. This is because the RCL fragments generally relate to individual sites, land that is subject to appeal in the Environment Court or sites where a designation applies.
- 1.21 Schedules have not been prepared for RCL near Jacks Point. This is because the focus of interest for the current Variation is the Upper Clutha Basin. It is also noted that the Jacks Point area is the subject of a detailed spatial planning review by QLDC.

Methodology Report Structure and Scope

- 1.22 Drawing from this background, the Methodology Statement report is structured as follows:
- a. Provides an outline of the approach taken to the identification and evaluation of **landscape attributes and values** in the schedules.
 - b. Explains how **landscape capacity** is evaluated in the schedules.
 - c. Explains how the **schedules link with the District Plan Policy Framework**.
 - d. Describes the **landscape assessment 'method'** (or 'process') that has been used to complete schedules. This includes:
 - i. a description of **other expert inputs** into the preparation of the Schedules;
 - ii. an explanation of how **associative values** have been addressed;
 - iii. an explanation of how **perceptual values** have been addressed;
 - iv. **other information sources** relied on;
 - v. the **schedule** template;
 - vi. a description of the **field survey**;

- vii. a summary of the **peer review** process;
- viii. the **delineation of 'landscape character units'** within the Schedule areas;
- ix. the **data sources** that have been relied on;
- x. any **assumptions** that have underpinned the preparation of the Schedules; and
- xi. the **step-by-step process** that has been used to complete the work.

1.23 It should be noted that while the outline above frames the method that has been applied for the Upper Clutha 21.23 Schedules and Mata-au Clutha River PA Schedule 21.22.25 workstream, this is not formulaic and is inevitably contextual requiring professional judgement to determine the appropriate method.

2.0 Landscape Attributes and Values

- 2.1 The author understands that the purpose of this aspect of the Upper Clutha 21.23 Schedules and Mata-au Clutha River PA Schedule 21.22.25 workstream is to provide guidance to plan users by identifying and rating the landscape values of the schedule areas that require management under the PDP.
- 2.2 The identification and evaluation of the landscape attributes and values referenced in the schedules is underpinned by the landscape assessment methodology set out in *Te Tangi a Te Manu* (the Aotearoa Landscape Assessment Guidelines July 2022, that were unanimously adopted by the New Zealand Institute of Landscape Architects Tuia Pito Ora (NZILA TPO) at the 49th AGM on 5 May 2021 (referred to as **TTatM**²).
- 2.3 TTatM reflects best practice landscape assessment in Aotearoa and has been carefully drafted to incorporate up-to-date guidance from the Environment Court with respect to landscape assessment.
- 2.4 In particular, four key concepts addressed in TTatM have informed the range of landscape attributes and values (or 'factors') addressed in the schedules, along with the evaluation of the landscape attributes and values:
- a. the three-dimensional concept of landscape;
 - b. the definition of landscape values;
 - c. the discussion of the factors that might inform a 'starting point' for describing and evaluating landscape values; and
 - d. the rating of landscape values.

² https://nzila.co.nz/media/uploads/2021_07/210505_Te_Tangi_a_te_Manu_Revised_Final_Draft_as_approved_5_May_2021.pdf.

A Three-Dimensional Concept of Landscape

2.5 As explained in TTatM³:

Landscape embodies the relationship between people and place: it includes the physical character of an area, how the area is experienced and perceived, and the meanings associated with it.

Whenua is the nearest Te Reo term for landscape, although the terms are not directly interchangeable. Whenua contains layers of meaning concerning people’s relationship with the land.

Professional practice conceives of landscape as comprising three dimensions: the physical environment, peoples’ perceptions of it, and the meanings and values associated with it. This concept, integrated with mātauranga, provides a potential bridge between whenua and landscape.

*The current professional practice of conceptualising landscape as three overlapping dimensions provides a bridge between Te Ao Māori and Te Ao Pākehā meanings: (see **Figure 1** below)*

- *Physical (the physical environment – its collective natural and built components and processes); and*
- *Associative (the meanings and values we associate with places); and*
- *Perceptual (how we perceive and experience places).*

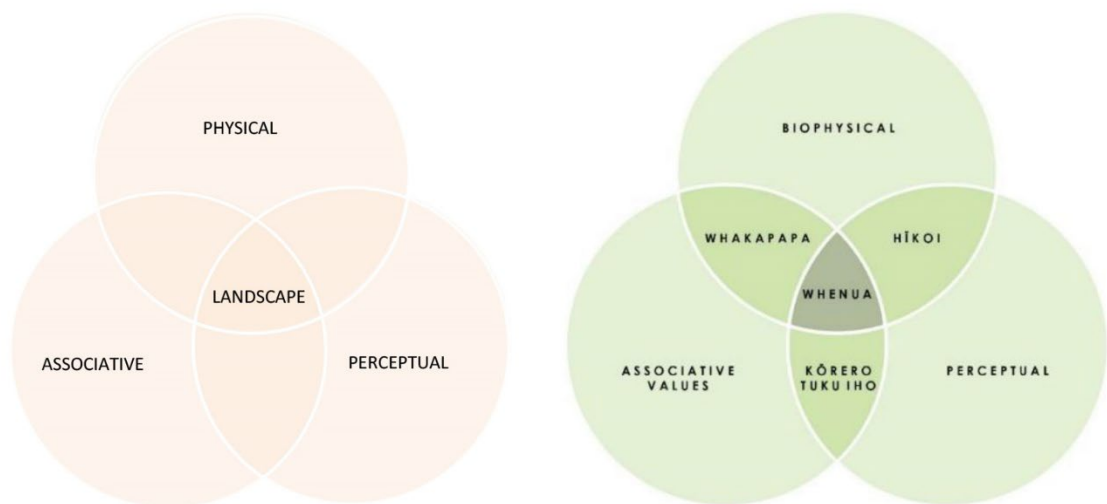


Figure 1: Diagrammatic representation of the bridge between Te Ao Māori and Te Ao Pākehā meaning of landscape. Source: TTatM, page 32.

2.6 TTatM elaborates on the **three dimensions of landscape** as follows:

*‘Physical’ means both the natural and human-derived features, and the interaction of natural and human **processes** over time. Other terms sometimes used for this dimension include ‘natural and physical resources’ (which echoes RMA phraseology), natural and built environment (which echoes the Randerson Report phraseology), ‘physical environment’,*

³ Refer TTatM, pages 31 and 32.

‘biophysical’ (which is potentially problematic if it is taken to mean only the natural aspects of landscape rather than both natural and human features), and **‘geographical’**.

‘Associative’ means 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. Such associations typically arise over time out of the relationship between people and place. *Tāngata whenua* associations are therefore especially relevant because of primacy and duration. *Pūrākau*, *tikanga*, *whakapapa*, and *mātauranga* are key considerations of the associative dimension from a Te Ao Māori perspective, particularly important when considering matters such as *mauri* and *wairua*. Other terms sometimes used for this dimension include **‘intangible’**, **‘meanings’**, **‘place-related’** (sense of place).

‘Perceptual’ means both sensory experience and interpretation. Sensory appreciation typically occurs simultaneously with interpretation, knowledge, and memory. What we **know**, **remember**, and **imagine** influences how we perceive a place. While sight is the sense most typically applied to landscape assessment, sensory perception importantly includes all the senses such as sound, smell, touch, and taste (the smell of the forest floor, sounds of a city, feel of the wind, sense of movement in the tides and waterways, tastes of an area’s foods, or of salt on the wind). Other terms sometimes used for the perceptual dimension include **‘sensory’** (which suggests only raw senses and does not capture the cognitive or interpretative aspect that is implied in the term ‘perceptual’), **‘aesthetic’** (which suggests a focus on beauty rather than wider appreciation), and **‘experiential’** which perhaps better conveys movement and active engagement.

- 2.7 The Topic 2 decisions use the term **‘sensory’** rather than **‘perceptual’** (as used in TTatM). This reflects the ongoing debate within the landscape profession at the time of landscape evidence preparation for the Topic 2 appeal hearings with respect to terminology. Since that time, the landscape profession has agreed to use the term ‘perceptual’ rather than ‘sensory’ as it captures both the sensory experience and peoples’ interpretation of those sensory experiences. For this reason, the term ‘perceptual’ is used in the schedules.

Landscape Values

- 2.8 TTatM explains that **landscape values** are:

...the reasons a landscape is valued – the aspects that are important or special or meaningful. Values may relate to each of the landscape’s dimensions – or, more typically, the interaction between the dimensions. They could relate to the physical condition of the landscape, the meanings associated with certain attributes, and their aesthetic qualities. Importantly, values are embodied in certain physical attributes (values are not attributes, but they depend on attributes).⁴

- 2.9 TTatM elaborates that values are ascribed by people and typically reflect different interests and perspectives, observing that even natural values, which may be referred to as ‘intrinsic’, are values ascribed by people. It is the role of the landscape assessor to provide an impartial assessment of landscape values.⁵

⁴ TTatM, paragraph 5.6.

⁵ Ibid, paragraphs 5.9 and 5.10.

The Factors that Inform an Understanding of Landscape Values

2.10 TTatM explains that the three dimensions are complementary, overlapping, and non-hierarchical⁶ and provides a **list of the typical factors** often considered under the dimensions of landscape:

- Physical
- (Natural and human):
 - Geology and geomorphology.
 - Topography and hydrology (including drainage patterns).
 - Climate and weather patterns.⁷
 - Soil patterns.
 - Vegetation patterns.
 - Ecological (flora and fauna) and dynamic components.
 - Settlements and occupation.
 - Roads and circulation.
 - Land use – cadastral pattern.
 - Buildings.
 - Archaeology and heritage features.
 - Tāngata whenua features.
 - Likely future (permitted or consented) activities in the environment.

- Associative
- Tāngata whenua creation and origin traditions manifest in landscape features.⁸
 - Tāngata whenua associations and experience – (historic, contemporary, and future)⁹ including pūrākau, whakapapa, tikanga, and mātauranga.¹⁰
 - Tāngata whenua metaphysical aspects such as wairua and mauri.
 - Legal personification of landscape features.
 - Historic associations and stories attached to the landscape since European settlement.
 - Shared and recognised values of a landscape derived from community life including the community’s livelihood, its history and reason for being in that place, places of social life and gathering, places associated with metaphysical meanings such as retreat, contemplation, and commemoration.
 - Landscape values associated with identity such as attributes that are emblematic for an area, places that are central to a community (main street, wharf, park), features that are anthropomorphised.
 - Landscapes that are engaged through activities such traditional food and resource gathering, recreational use, food and wine that reflect a locale, tourism based on landscape experience or appreciation of a landscape’s qualities.

⁶ TTatM paragraph 4.28.

⁷ Factors are intertwined. For example, high rainfall on the West Coast results in lush vegetation and very active erosion compared to the dry regimes east of the Southern Alps. Much of the topography of the Southern Alps is influenced by glaciation which is also strongly influenced by climate. Characteristic weather patterns are also part of a landscape’s character, such as the Waikato River’s mists, Hauturu-o-Toi’s cloud puff, Canterbury’s Nor-west arch, and Greymouth’s ‘The Barber’ wind.

⁸ Such traditions often explain the appearance of features, whakapapa connections between them and between features and tangata whenua, and patterns of occupation and use. Creation and origin traditions are associated with many landscape features – particularly notable examples include Aoraki, Mauao, Taranaki maunga, and Te Mata-o-Rongokako.

⁹ Tāngata whenua have a holistic relationship with landscape in all its dimensions. The highlighting of certain factors in this list is not to be interpreted as restricting tāngata whenua landscape values to such factors.

¹⁰ Refer **QLDC Proposed District Plan Chapter 2 Definitions 2.3 Glossary and Chapter 5 Tangata Whenua**.

- Perceptual
- Geomorphic legibility (how obviously a landscape expresses the geomorphic processes).
 - Wayfinding and mental maps (legibility or visual clarity of landmarks, routes, nodes, edges, and areas of different character).
 - Memorability.
 - Coherence (the extent to which patterns reinforce each other, coherence between human patterns and underlying natural landscape).
 - Aesthetic qualities.
 - Naturalness.
 - Views.
 - Wildness/remoteness.
 - Transient attributes.

2.11 TTatM clarifies that such lists are useful reminders but are not intended as a formula, explaining:

- Factors straddle dimensions (e.g., 'naturalness' is a function of physical, associative, and perceptual dimensions) – it is the interplay between dimensions that is often key.
- Not every factor is relevant everywhere, and factors that are not listed may be relevant.
- The relative weight given to a factor depends on context and issues.
- Assessment and interpretation of such factors (and the conclusions and recommendations that flow from them) is a matter of professional judgement. As with all matters of professional judgement, explanation and reasons are key.

2.12 TTatM also explains how the three overlapping dimensions of landscape (i.e. physical, associative and perceptual) draw from factor lists such as the 'Pigeon Bay factors'¹¹ and the 'Lammermoor list'¹², commenting that the benefit of 'repacking' such factors as three overlapping dimensions include:

- Accommodating both tāngata whenua and western world views in a holistic manner.
- Linking the dimensions more directly with the definition of 'landscape'.
- Providing flexibility to include other relevant factors and criteria depending on context.
- Discouraging use of such checklists as a default formula.

2.13 The list of 'factors' set out in TTatM is longer and more comprehensive than the list of factors in PDP Chapter 3 SP 3.3.43. This reflects the more 'summary' nature of SP 3.3.43. Importantly, all of the factors referenced in TTatM sit within the 'scope' of the factors listed in SP3.3.43.

2.14 The matter of **landscape scale** is also of importance in identifying (and rating) landscape values.

2.15 The physical scale of the landscapes to which a landscape schedule is to apply (e.g. regional scale, district scale etc) will influence the 'grain' or level of detail in the schedule.

2.16 As explained earlier, for the Upper Clutha 21.23 Schedules, the physical extent of the Rural zoned land which is classified as RCL in the Upper Clutha Basin has been determined via the District Plan Review process, with the extent of each of the 21.23 Schedule areas defined by BGLA and Helen Mellsop. However, it is important to note that the grain of landscape description and evaluation applied in the Upper Clutha 21.23 Schedules is inevitably coarser grained than a site-by-site landscape evaluation process. It will be important that this distinction is made in any future planning documents that incorporate the schedules. As mentioned previously, many of the schedule areas assessed do not constitute complete 'landscapes' but are, in some cases, landscape character units, or areas, within a broader landscape.

¹¹ For example, see NZEnvC C180/99 at [7].

¹² For example, see NZEnvC 432 at [50].

- 2.17 Further, the Schedules include attributes that contribute positively to landscape values, attributes that detract from landscape values, and attributes that are neutral with respect to informing landscape values. Reference to ‘Other distinctive vegetation types’ and the ‘Important land use and patterns and features’ in the Schedules do not relate to attributes or landscape values that need to be protected. Rather, these are attributes that influence landscape values (and landscape capacity). Reference to these existing attributes is not intended to ‘lock in’ existing land uses.
- 2.18 The reference to ‘Plant and Animal Pests’ corresponds to attributes that detract from landscape values. Pest information is included at the end of the landscape capacity section of each Schedule. Few, if any of the District’s RCL or ONF/L areas are pristine and there are varying levels of modification evident (including plant and animal pests). This means that landscape restoration and enhancement (which can include the management of pests) is a highly desirable outcome. The reference to plant and animal pests is intended to guide appropriate future landscape management within the Schedule area. (For example, where a resource consent or plan change is proposed within a Schedule area, the proposal or provisions may seek to specifically address the management of pests).
- 2.19 In addition, the identification of an attribute in a Schedule is not confirmation or otherwise as to whether the attribute has been legally established.

Rating Landscape Values

- 2.20 TTatM recommends a seven-point rating scale for the evaluation of landscape values (and landscape effects) explaining that the seven-point scale is recommended as a ‘universal’ scale for the following reasons:

It is symmetrical around ‘moderate’.

It has even gradations.

It uses neutral terms so does not confuse rating and qualitative aspects.

The scale is therefore suitable for both positive and adverse effects, and for other purposes such as aspects of landscape value and natural character. It can be used in a ‘universal’ manner. (Emphasis added.)

The seven points provide for nuance of ranking, while being near the practical limit at which such distinctions can be made reliably. For those who struggle with seven points, the scale can be envisaged as three simpler categories (low, moderate, high) with finer steps above, below, and in-between.¹³

very low	low	low-mod	moderate	mod-high	high	very high
low			moderate		high	

- 2.21 Rating landscape values is a complex and iterative phase requiring a significant component of expert judgement by the landscape assessor, and typically including input from a **Study Team** comprised of other expert disciplines (for example, ecologists, geologists, archaeologists, where relevant), iwi representatives, Council staff, key stakeholders, and (ideally) representatives of the wider community.
- 2.22 The process by which input from other expert disciplines (ecology, heritage, recreation, geomorphology), iwi representatives, Council staff, key stakeholders, and (ideally) representatives of the wider community

¹³ See TTatM paragraphs 6.21 and 6.22.

has been integrated into the Schedules is explained shortly under the discussion of the Landscape Assessment 'Method'.

- 2.23 Further, as TTatM advises (at paragraph 5.30), care is required in rating attributes to quantitatively evaluate landscapes for the following reasons:

Conceptually, landscape is the interplay of dimensions – not the sum of their parts.

Value is embodied in specific character and attributes, not the generic criteria/factors that typically make up a scoring framework.

The relative significance of any criterion/factor depends on context.

While in practice a high 'score' for one dimension is often repeated by high scores in the other dimensions (given that the physical, associative, and perceptual dimensions typically resonate with each other), such self-reinforcing tendencies do not always hold true and should not be misconstrued. It is possible for a landscape to have a single over-riding reason for its value.

Some criteria/factors, particularly in more detailed schema, may be in opposition (for example rarity vs representativeness, historic features vs naturalness).

3.0 Landscape Capacity

- 3.1 The purpose of this aspect of the Schedules is to provide guidance to plan users by assessing and recording the landscape capacity of the area for subdivision and development activities for a range of different land uses.
- 3.2 In addition, the author notes that assessments of landscape capacity of this nature are typically aimed at assisting the management of cumulative adverse landscape effects.
- 3.3 As discussed earlier, the meaning of 'landscape capacity' within the context of the district has been defined in PDP Chapter 3. These definitions of landscape capacity have informed the corresponding assessment within the Schedules.
- 3.4 PDP Chapter 3 also provides guidance with respect to the range of land uses for which the landscape capacity should be assessed, acknowledging that other activities may be deserving of consideration.
- 3.5 Some of the land uses addressed in the schedules are described in Chapter 2: Definitions of the PDP. The exceptions to this are clarified as follows:
- i. 'Tourism related activities' which the author and peer reviewer have assumed has the same meaning as 'resort' in Chapter 2.
 - ii. 'Intensive agriculture' which the author and peer reviewer have assumed has the same meaning as 'factory farming' in Chapter 2.
 - iii. 'Urban expansions' which the author and peer reviewer have assumed means: a change from a rural activity to urban development; or a change (including any proposed change) in zoning to an urban zone, including any change to the urban growth boundary or any other zone changes (or proposed changes) that would provide for urban development.
 - iv. 'Mineral extraction' which the author and peer reviewer have assumed has the same meaning as 'mining activity' in Chapter 2.

- v. 'Farm scale quarries' which the author and peer reviewer have assumed means the mining of aggregate for farming activities on the same site.
 - vi. 'Renewable energy generation' which the author and peer reviewer have assumed has the same meaning as 'Renewable Electricity Generation and Renewable Electricity Generation Activities' in Chapter 2.
 - vii. 'Forestry' which the author and peer reviewer have assumed has the same meaning as 'Forestry activities' in Chapter 2.
 - viii. 'Rural living' which the author and peer reviewer have assumed has the same meaning as rural living in Chapter 3 section 3.1B.5.
 - ix. 'Passenger lift systems' which the author and peer reviewer have assumed has the same meaning as Chapter 2 except that for the purposes of the schedules, it includes base and terminal buildings and stations.
 - x. 'Jetties, lake structures, moorings and boatsheds' (where relevant), which the author and peer reviewer have assumed have their plain meaning (and may be used interchangeably).
- 3.6 As TTatM explains: an evaluation of (landscape) capacity is a necessarily imprecise process because it involves estimating an unknown future.¹⁴
- 3.7 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 Schedule area rather than a series of measurable standards (such as a specified building height or building coverage control).
- 3.8 This reflects the complex nature of successfully integrating subdivision, use, and development into RMA s7(c) amenity 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.
- 3.9 For the purposes of the Schedules, landscape capacity is described using the following four terms:
- **some** landscape capacity;
 - **limited** landscape capacity;
 - **very limited** landscape capacity;
 - **extremely limited** landscape capacity; and
 - **extremely limited or no** landscape capacity.
- 3.10 The choice of wording here is deliberate. Given the uncertainty around what a specific landuse might entail, the author has not applied the seven-point rating scale (described above) but favoured a 'less absolute' terminology.¹⁵
- 3.11 Further, the ONL or amenity (RMA s7(c)) landscape context of the Schedules, means that they are inevitably sensitive to land use change (albeit to varying degrees). For this reason, the choice of terminology intentionally favours a relatively cautious approach to land use change.

¹⁴ See TTatM paragraph 5.46 last bullet point.

¹⁵ For example, under the land use type of 'renewable energy generation' this can range from a single wind turbine for domestic use to a large-scale windfarm.

3.12 To assist plan users, the following broad explanation of each of these terms is as follows:

Some landscape capacity: typically, this corresponds to a situation in which a careful or measured amount of some sensitively located and designed development of this type is unlikely to materially compromise the identified landscape values.

Limited landscape capacity: typically, this corresponds to a situation in which the landscape is near its capacity to accommodate development of this type without material compromise of its identified landscape values and where only a limited amount of sensitively located and designed development is unlikely to materially compromise the identified landscape values.

Very limited landscape capacity: typically, this corresponds to a situation in which the landscape is very close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only a very limited amount of sensitively located and designed development is likely to be appropriate.

Extremely limited landscape capacity: typically, this corresponds to a situation in which the landscape is extremely close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only an extremely limited amount of very sensitively located and designed development is likely to be appropriate.

Extremely limited or no landscape capacity: typically, this corresponds to a situation in which the landscape is extremely close to, or already at, capacity to accommodate development of this type without material compromise of its identified landscape values, and where either no, or an extremely limited amount of very sensitively located and designed development is likely to be appropriate.

3.13 It is intended that the use of this five-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 land use type that will maintain and/or enhance landscape character and visual amenity values in the schedule areas.

3.14 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 an overall 'Schedule area' scale, rather than a 'site' scale.

3.15 It should be noted that the capacity evaluation has taken into consideration residential building platforms but does not factor in consents that have not been implemented.

4.0 The link between the Schedules and the District Plan Policy Framework

4.1 For methodological consistency and transparency, the Schedules have been structured and prepared in the same way as the Priority Area Schedules, using the three dimensions of landscape: physical, associative and perceptual (or sensory) described above. This is established and accepted by the NZILA best practice.

4.2 This approach reflects the fact that all landscapes (and not just Aotearoa's very high value landscapes), are the 'result' of the collective interaction of these three dimensions of 'landscape'.

4.3 Landscape character and visual amenity values are expressed through the 'three dimensioned' structure of the Schedules (i.e. physical, associative and perceptual / sensory). The concept of 'landscape character' encompasses all three dimensions of landscape. 'Visual amenity values' typically draw from the perceptual dimension, however there is inevitably an overlap with the physical dimension.

4.4 The schedule author has carefully considered the potentially perceived 'disconnect' between the 3.3.41 text and the 21.23 Schedule structure. It is the author's view that structuring the 21.23 Schedules to more

'neatly' align with the terminology in the PDP would be methodologically flawed as it amounts to plan policy guiding how landscape schedules are 'crafted', rather than landscape assessment best practice (as articulated in TTaTM and which has informed the 21.23 Schedule structure).

- 4.5 In a similar way, the policy context for PAs set out at 3.3.41 mentions 'aspects' that are not specifically referenced in the 21.23 Schedules. For example, assess and record the relationship between the PA and the wider RCL context; and assess and record the relationship between the PA and ONFs in the Upper Clutha Basin. Again, for reasons of methodological consistency and transparency, the Schedule author does not consider that it is appropriate to craft the schedules to respond to these specific policy constructs and considers that the three dimensional landscape approach allows for these matters to be referenced. The Schedule author has carefully considered the content and terminology in the 21.23 Schedules, to ensure that the requirements of 3.3.41 have been adequately addressed and that there is a reasonably obvious link between the 21.23 Schedule text and policy 3.3.41 wording.

5.0 Landscape Assessment 'Method'

- 5.1 This section of the Methodology Statement explains the process or 'method' used to prepare the Schedules.

'Other Expert' Inputs

- 5.2 The three-dimensional approach to assessing landscape values outlined in Section 3 typically involves input by 'other expert' disciplines (i.e. non landscape architects).
- 5.3 The range of other disciplines required to assist landscape evaluation will vary from district to district throughout New Zealand depending on the landscape characteristics of the area. For example: the proliferation of volcanic features throughout Tāmaki Makaurau (Auckland), suggests a need for expert geological input to understand landscape values; the largely indigenous vegetation covered Raukumara Range would require expert ecology input to understand the health and value of the indigenous flora and fauna; and cultural landscape expert input would be required to understand the Te Ao Māori history and context to the modern day use and occupation of Ohinemutu Village on the shores of Lake Rotorua.
- 5.4 For the Queenstown Lakes District, the following expert inputs have informed the assessment of landscape values:
- a. Geomorphology (Jack McConchie).
 - b. Terrestrial Ecology (Simon Beale).¹⁶
 - c. Māori cultural landscape / mana whenua (Aukaha).
 - d. Recreation and tourism (Thrive Spaces and Places).
 - e. Heritage and archaeological (Origin Consultants).
- 5.5 Given that the Upper Clutha 21.23 Schedules and Mata-au PA Schedule 21.22.25 workstream is focussed on identifying the landscape values of the mapped RCL and ONF Areas (as opposed to a 'first principles' exercise of determining the extent and values of such areas), a pragmatic approach has been adopted to 'other expert' input. With the exception of cultural input (discussed shortly), this has involved the 'other experts' providing comment on a 'first draft' of the Schedules.

¹⁶ NB There has no expert input with respect to freshwater ecology.

- 5.6 More specifically, this includes responding to the following questions:
- a. *Bearing in mind the role of the Schedules to identify the landscape character and visual amenity values that need to be managed, are there any other attributes and values relevant to your discipline that are deserving of mention in the Schedules? If so, please advise recommending text description.*
 - b. *Are there amendments required to the (existing draft) description of values relevant to your discipline in the Schedules? If so, please advise recommended text amendments.*
- 5.7 The Methodology Statements for the 'other expert inputs' (excepting Māori cultural landscape / mana whenua expert input) are attached as **Appendix A** (NB this includes reports relating to the PA Landscape Schedules project as well as the current workstream).
- 5.8 With respect to suggested amendments to the Schedules 'text', the expert advice in relation to geomorphology, ecology, mana whenua and recreation and tourism has been adopted.
- 5.9 The Heritage and Archaeological suggested text amendments tend to focus on cross referencing to District Plan features rather than describing the 'values' that need to be protected, although it is noted that many such values are mentioned in the Origins Methodology Report. While many of the suggested text amendments to the Schedules have been incorporated, an approach to describing values has been retained in the Schedules.
- 5.10 The Schedule author acknowledges the reluctance of mana whenua to rate landscape values. The landscape experts defer to mana whenua on these matters and have sought to avoid specifically rating mana whenua values in the schedules.

Associative Values

- 5.11 Associative values embrace the meaning that mana whenua, communities, and individuals place on landscapes (and features).
- 5.12 The cultural input described above has assisted with informing the meaning that mana whenua associates with the Schedule areas.
- 5.13 With respect to the associative values ascribed by broader community to the Schedule areas, QLDC undertook:
- a) preliminary community consultation between 9 March and 3 April 2022 of all of the Schedule areas (prior to the notification of the PA Landscape Schedules). The preliminary or 'first' consultation process is described in section 4 of the Section 32 Evaluation Report.
 - b) a community consultation drop-in session on 4 July 2023 in relation to the 21.23 Schedules as described in section 4 of the Section 32 Evaluation Report.
 - c) Online consultation between 22 June 2023 and 6 August 2023 in relation to all of the Schedules, as described in section 4 of the Section 32 Evaluation Report.
- 5.14 The feedback from these three public consultation processes has been collated into Summary Tables (**Summary Tables**) by QLDC staff. The Summary Tables have been reviewed by the landscape schedule author and the (draft) Schedules amended to reflect many of the points raised by the public. To assist

transparency, the landscape schedule author has also recorded a brief response to each matter raised in the Summary Tables. (Refer **Appendix B.**)¹⁷

Perceptual Values

- 5.15 Perceptual values relate to our sensory experience of landscapes and features and includes a cognitive or interpretative aspect (as opposed to simply the 'raw' sensory experience). This dimension of landscape values has been assessed by the landscape architects in the project team (with Bridget Gilbert carrying out the expert evaluation and Helen Mellsop undertaking a peer review role). A number of comments provided during public consultation have also informed the drafting and rating of this aspect of landscape values.

Other Information Sources

- 5.16 Other information sources relied on in the preparation of the Schedules include:
- a. Crown Pastoral Land Tenure Review.
 - b. Environment Court decisions that address the relevant area, including expert landscape evidence referenced in decisions.
 - c. Landscape assessments prepared for resource consent applications within the relevant area.
 - d. Reserve Management Plans and publicly available geomorphological and archaeological reports.

Schedule Template

- 5.17 A copy of the Schedule template is attached in **Appendix C.**
- 5.18 The structure of the Schedule template responds to the directions of the Court in the Topic 2 decisions, applies the landscape methodology discussed in Section 3 and aligns with the structure used for the PA Schedules.

Field Survey

- 5.19 Helen Mellsop and Bridget Gilbert undertook a joint survey of the Schedule areas in December 2022 and are generally familiar with the landscapes assessed through previous experience within the District.

Peer Review Process

- 5.20 The Peer Review process has included involvement in the development of the methodology and schedule templates, determination of the Schedule areas with the Upper Clutha Basin RCL, field survey and discussions in relation to the attributes and values associated with each Schedule area. Each of the Draft Schedules was read and reviewed in sequence to ensure coherence in assessment descriptions, language and relativity between the Schedule areas. Some language edits were made to ensure consistency, however edits to the attributes, values and ratings outlined in the Schedules were undertaken through iterative discussion between the author and the reviewer. Edits to the Schedules

¹⁷ NB the landscape schedule authors have not corrected any typographical errors or the like in the Summary Tables as supplied by QLDC.

have thus been agreed between the assessors and the reviewer with the decision on edits made by the assessor.

5.21 The full Peer Review Report is attached as **Appendix D**.

Delineation of Landscape Character Units within Priority Areas

5.22 The Schedules 'team' have considered the utility of dividing the Schedule areas into landscape character units or 'sub areas' as they have worked through the drafting of the Schedules to assist an understanding of values. This has not been deemed necessary in any of the Schedule areas.

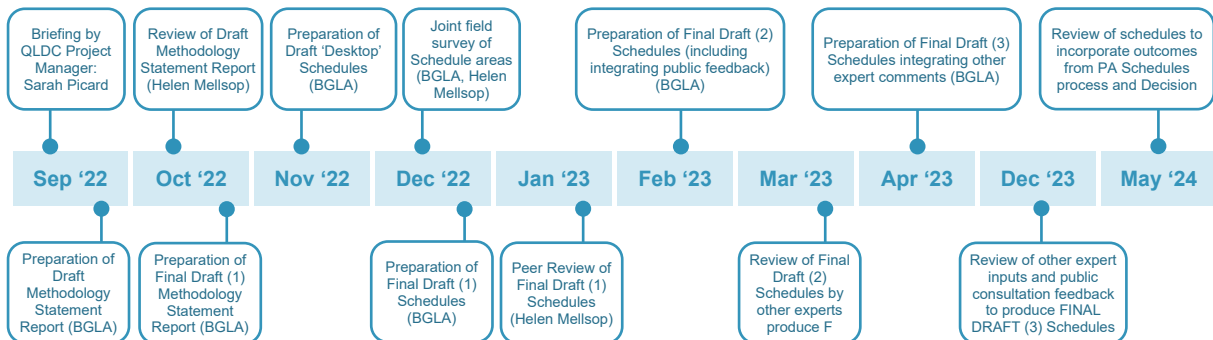
Data Sources

5.23 A full list of the GIS data and their sources relied on to inform the landscape assessment is attached in **Appendix E**.

Assumptions

5.24 The Schedules 'team' acknowledge that while they have some knowledge of some of the 'sites' within many of the Schedule areas, detailed site visits have not been made to assist the drafting of the Schedules. It is expected that as QLDC work through the notification process, detailed site visits may be appropriate to assist the refinement of the Schedules.

Step by Step Process



Appendix C2 – Methodology Report Appendices: **Saved separately**

Appendix D – Statutory Content

Appendix D: Section 32 Evaluation Report Upper Clutha Landscape Schedules Variation - Statutory Context

Strategic Direction Chapter 3

Plan Reference	Provision
SO 3.2.5	The retention of the District's distinctive landscapes. (addresses Issues 2 and 4). (SO 3.2.5.1 – 3.2.5.8 inclusive elaborate on SO 3.2.5. In addition, SO 3.2.1.7, 3.2.1.8 and 3.2.2.1 also elaborate on SO 3.2.5).
SO 3.2.5.1	The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related landscape capacity are identified.
SO 3.2.5.2	Within the Rural Zone, new subdivision, use and development is inappropriate on Outstanding Natural Features or in Outstanding Natural Landscapes unless: <ul style="list-style-type: none"> a. where the landscape values of Priority Areas of Outstanding Natural Features and Outstanding Natural Landscapes are specified in Schedule 21.22, those values are protected; or b. where the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are not specified in Schedule 21.22, the values identified according to SP 3.3.45 are protected. c.
SO 3.2.5.3	In locations other than in the Rural Zone, the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected from inappropriate subdivision, use and development.
SO 3.2.5.5	Within Rural Character Landscapes, adverse effects on landscape character and visual amenity values from subdivision, use or development are anticipated and effectively managed, through policies and rules, so that: <ul style="list-style-type: none"> a. landscape character is maintained; and b. visual amenity values are maintained or enhanced.
SO 3.2.5.6	In Rural Character Landscapes, new subdivision, use and development in proximity to any Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Feature or Landscape.
SO 3.2.5.7	In Rural Character Landscapes of the Upper Clutha Basin: <ul style="list-style-type: none"> a. Priority Areas of Rural Character Landscapes are identified; and b. associated landscape character and visual amenity values and related landscape capacity are identified.
SO 3.2.7	The partnership between Council and Ngāi Tahu is nurtured. (addresses Issue 6).

SO 3.2.7.1	Ngāi Tahu values, interests and customary resources, including taonga species and habitats, and wāhi tūpuna, are protected.
SO 3.2.7.2	The expression of kaitiakitanga is enabled by providing for meaningful collaboration with Ngāi Tahu in resource management decision making and implementation.
SP 3.3.29	<p>For Outstanding Natural Features and Outstanding Natural Landscapes, identify landscape values and landscape capacity:</p> <ul style="list-style-type: none"> a. for Priority Areas identified in Schedule 21.22, in accordance with the values identification framework in SP 3.3.36 - 3.3.38 and otherwise through the landscape assessment methodology in SP 3.3.45 and through best practice landscape assessment methodology; and b. outside of identified Priority Areas, in accordance with the landscape assessment methodology in SP 3.3.45 and through best practice landscape assessment methodology. <p><i>(relevant to SO 3.2.5, 3.2.5.1)</i></p>
SP 3.3.30	<p>Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.</p> <p><i>(relevant to SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.5, 3.2.5.2, 3.2.5.3, 3.2.5.4 and 3.2.5.6)</i></p>
SP 3.3.33	<p>For Rural Character Landscapes, identify landscape character to be maintained, and visual amenity values to be maintained or enhanced and related landscape capacity:</p> <ul style="list-style-type: none"> a. for Priority Areas of the Upper Clutha Basin, in Schedule 21.23, in accordance with the b. values identification framework in SP 3.3.39 - 3.3.41 and otherwise through the landscape assessment methodology in SP 3.3.45 and through best practice landscape assessment methodology; and c. outside of identified Priority Areas, in accordance with the landscape assessment methodology in SP 3.3.45, and through best practice landscape assessment methodology; and d. through associated District Plan rules setting measurable spatial or other limits, and related assessment matters, as to cumulative subdivision and development including as to location, quantity, density and design. <p><i>(relevant to SO 3.2.5, 3.2.5.5 – 3.2.5.7)</i></p>
SP 3.3.35	In any Rural Character Landscape that is not a Priority Area, or is a Priority Area that has not achieved the requirements of SP 3.3.33, do not allow new subdivision or development for the purposes of Rural Living except where:

	<p>a. according to the methodology in SP 3.3.45 and having regard to the wider landscape context:</p> <ul style="list-style-type: none"> i. a landscape character area for assessment purposes is identified at an appropriate landscape scale including by mapping; ii. the landscape character and visual amenity values of that landscape character area are identified; and iii. the landscape capacity of that landscape character area is assessed so as to soundly inform a determination that the requirements of SP 3.3.23 are met; and <p>b. the approval of new subdivision or development for the purposes of Rural Living maintains the landscape character and maintains or enhances the visual amenity values identified in relation to that landscape character area and the wider landscape context.</p> <p><i>(relevant to SO 3.2.1, 3.2.1.8, 3.2.5, 3.2.5.5)</i></p>
<p>SP 3.3.36</p>	<p>Identify in Schedule 21.22 the following Rural Zone Priority Areas within the Outstanding Natural Features and Outstanding Natural Landscapes shown on maps held on [QLDC reference file]:</p> <ul style="list-style-type: none"> a. parts of the Outstanding Natural Features of Peninsula Hill, Ferry Hill, Shotover River, Morven Hill, Lake Hayes, Slope Hill, Feehly Hill, Arrow River, Kawarau River, Mt Barker, and Mt Iron.¹ b. parts of the Outstanding Natural Landscapes of West Wakatipu Basin, Queenstown Bay and environs, Northern Remarkables, Central Wakatipu Basin Coronet Area, East Wakatipu Basin and Crown Terrace Area, Victoria Flats, Cardrona Valley, Mount Alpha, Roys Bay, West Wanaka, Dublin Bay, Hāwea South and North Grandview, and Lake McKay Station and environs. <p><i>(relevant to SO 3.2.5, 3.2.5.1)</i></p>
<p>SP 3.3.37</p>	<p>For the Priority Areas listed in SP 3.3.36, according to SP 3.3.38, describe in Schedule 21.22 at an appropriate landscape scale:</p> <ul style="list-style-type: none"> a. the landscape attributes (physical, sensory and associative); b. the landscape values; and c. the related landscape capacity. <p><i>(relevant to SO 3.2.5, 3.2.5.1)</i></p>
<p>SP 3.3.38</p>	<p>To achieve SP 3.3.37 for each Priority Area:</p> <ul style="list-style-type: none"> a. identify the key physical, sensory and associative attributes that contribute to the values of the Feature or Landscape that are to be protected;

¹ SP 3.3.36(a) is subject to change as part of this variation, see Appendix A for the proposed amendment.

	<ul style="list-style-type: none"> b. describe in accordance with SP 3.3.43, and then rate, those attributes; and c. assess and record the related landscape capacity for subdivision, use and development activities including but not limited to: <ul style="list-style-type: none"> i. commercial recreational activities; ii. visitor accommodation and tourism related activities; iii. urban expansions; iv. intensive agriculture; v. earthworks; vi. farm buildings; vii. mineral extraction; viii. transport infrastructure; ix. utilities and regionally significant infrastructure; x. renewable energy generation; xi. forestry; xii. rural living. <p>(relevant to SO 3.2.5, 3.2.5.1)</p>
<p>SP 3.3.42</p>	<p>The Council shall notify a proposed plan change to the District Plan by 30 June 2022 to implement SPs 3.3.36, 3.3.37, 3.3.39 and 3.3.40. (relevant to SO 3.2.5, 3.2.5.1 and 3.2.5.7).</p>
<p>SP 3.3.43</p>	<p>In applying the Strategic Objectives and Strategic Policies for Outstanding Natural Features, Outstanding Natural Landscapes and Rural Character Landscapes, including the values identification frameworks in SP 3.3.37, 3.3.38, 3.3.40 and 3.3.41 and the landscape assessment methodology in SP 3.3.45, have regard to the following attributes:</p> <ul style="list-style-type: none"> a. Physical attributes: <ul style="list-style-type: none"> i. geology, geomorphology and topography; ii. ecology; iii. vegetation cover (exotic and indigenous); iv. the presence of waterbodies including lakes, rivers, streams, wetlands, and their hydrology; v. land use (including settlements, buildings and structures; and b. Sensory (or experiential) attributes: <ul style="list-style-type: none"> i. legibility or expressiveness – how obviously the feature or landscape demonstrates its formative processes; ii. aesthetic values including memorability and naturalness; iii. wild or scenic values; iv. transient values including values at certain times of the day or year;

	<ul style="list-style-type: none"> v. experiential attributes, including the sounds and smells associated with the landscape; and c. Associative attributes: <ul style="list-style-type: none"> i. whether the attributes identified in (a) and (b) are shared and recognised; ii. cultural and spiritual values for Tangata Whenua; iii. historical and heritage associations; and iv. recreational values. <p><i>(relevant to SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.2, 3.2.2.1, 3.2.5, 3.2.5.1 – 3.2.5.7)</i></p>
<p>SP 3.3.44</p>	<p>Where any or any part of an Outstanding Natural Feature, Outstanding Natural Landscape or a Rural Character Landscape is not identified as a Priority Area in Schedule 21.22 or 21.23, this does not imply that the relevant area:</p> <ul style="list-style-type: none"> a. is more or less important than the identified Priority Areas in terms of: <ul style="list-style-type: none"> i. the landscape attributes and values, in the case of an Outstanding Natural Feature or Outstanding Natural Landscape; ii. landscape character and visual amenity values, in the case of a Rural Character Landscape; or b. is more or less vulnerable to subdivision, use and development. <p><i>(relevant to SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.2, 3.2.2.1, 3.2.5, 3.2.5.1 – 3.2.5.7)</i></p>
<p>SP 3.3.45</p>	<p>Landscape assessments shall:</p> <ul style="list-style-type: none"> a. for Outstanding Natural Features and Outstanding Natural Landscapes: <ul style="list-style-type: none"> i. identify landscape attributes and values; and ii. assess effects on those values and on related landscape capacity; b. for Rural Character Landscapes: <ul style="list-style-type: none"> i. define a relevant landscape character area and its wider landscape context; ii. identify the landscape character and visual amenity values of that landscape character area and within its wider landscape context; and iii. assess effects on that character and those values and on related landscape capacity; c. in each case apply a consistent rating scale for attributes, values and effects. <p>Note: QLDC may, from time to time, promulgate and update guidelines that provide assistance in the application of best practice landscape assessment methodologies.</p>

	<i>(relevant to SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.2, 3.2.2.1, 3.2.5, 3.2.5.1 – 3.2.5.7)</i>
SP 3.3.46	<p>The Landscape Assessment Methodology required by SP 3.3.45 is to be implemented when assessing:</p> <ol style="list-style-type: none"> a. a proposed plan change affecting the rural environment; b. a resource consent application for the subdivision, use or development of land where: <ol style="list-style-type: none"> i. the application is for a restricted discretionary, discretionary or non-complying activity; and ii. the proposal is in relation to land within an Outstanding Natural Feature or Outstanding Natural Landscape or gives rise to landscape effects and is on land with Rural zoning; or c. a notice of requirement where the proposal is in relation to land within an Outstanding Natural Feature or Outstanding Natural Landscape or gives rise to landscape effects and is on land with Rural zoning; or d. a resource consent where the proposal (or part thereof) is in an Exception Zone in 3.1B.5 and gives rise to landscape effects on the receiving environment that includes an Outstanding Natural Feature or Outstanding Natural Landscape on land with Rural zoning outside that Exception Zone. <p><i>(relevant to SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.2, 3.2.2.1, 3.2.5, 3.2.5.1 – 3.2.5.7)</i></p>

Tangata Whenua Chapter 5

Plan Reference	Provision
Objective 5.3.1	Consultation with tangata whenua occurs through the implementation of the Queenstown Lakes District Plan Policies
Policy 5.3.1.1	Ensure that Ngāi Tahu Papatipu Rūnanga are engaged in resource management decisionmaking and implementation on matters that affect Ngāi Tahu values, rights and interests, in accordance with the principles of the Treaty of Waitangi.
Policy 5.3.1.2	Actively foster effective partnerships and relationships between the Queenstown Lakes District Council and Ngāi Tahu Papatipu Rūnanga.
Policy 5.3.1.3	When making resource management decisions, ensure that functions and powers are exercised in a manner that takes into account 5 iwi management plans.
Policy 5.3.1.4	Recognise that only tangata whenua can identify their relationship and that of their culture and traditions with their ancestral lands, water sites, wāhi tapu, tōpuni and other taonga.

Landscapes and Rural Character Chapter 6

Plan Reference	Provision
Policy 6.3.1.1	Categorise the Rural Zoned landscapes in the District as: <ol style="list-style-type: none"> a. Outstanding Natural Feature (ONF); b. Outstanding Natural Landscape (ONL); c. Rural Character Landscape (RCL) (SO 3.2.5 and SP 3.3.28, 3.3.32)
Policy 6.3.2.7	Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Character Landscapes in proximity to an Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Outstanding Natural Feature or Outstanding Natural Landscape. (SO 3.2.5, 3.2.5.2, 3.2.5.3, 3.2.5.4, 3.2.5.6, and SP 3.3.30, 3.3.31)
Policy 6.3.3	Managing Activities on Outstanding Natural Features and in Outstanding Natural Landscapes
Policy 6.3.3.1	Recognise that subdivision and development is inappropriate on Outstanding Natural Features or in Outstanding Natural Landscapes unless: <ol style="list-style-type: none"> a. landscape values are protected; and b. in the case of any subdivision or development, all buildings and other structures and all changes to landform or other physical changes to the appearance of land will be reasonably difficult to see from beyond the boundary of the site in question. (SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.5, 3.2.5.2, 3.2.5.3, 3.2.5.4 and SP 3.3.2, 3.3.23, 3.3.30, 3.3.31)
Policy 6.3.3.2	Ensure that the protection of Outstanding Natural Features and Outstanding Natural Landscapes includes recognition of any values relating to cultural and historic elements, geological features and matters of cultural and spiritual value to Tangata Whenua, including tōpuni and wāhi tūpuna. (SO 3.2.3, 3.2.3.1, 3.2.5.2, 3.2.5.3, 3.2.5.4, 3.2.7.1, and SP 3.3.17, 3.3.23, 3.3.30, 3.3.31, 3.3.43, 3.3.49, 3.3.50, Chapter 5)
Policy 6.3.3.3	For farming activities within Outstanding Natural Features and Outstanding Natural Landscapes: <ol style="list-style-type: none"> a. Recognise that farming activities may modify the landscape;

	<p>b. Enable those activities in a way that is consistent with protecting the values of Outstanding Natural Features and Outstanding Natural Landscapes.</p> <p>(3.2.1.7, 3.2.1.8, 3.2.4.1, 3.2.5.1, 3.3.20, 3.3.30)</p>
Policy 6.3.3.5	<p>Maintain the open landscape character of Outstanding Natural Features and Outstanding Natural Landscapes where it is open at present.</p> <p>(SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.5, 3.2.5.2, 3.2.5.3, 3.2.5.4, and SP 3.3.2, 3.3.21, 3.3.23, 3.3.30, 3.3.31)</p>
Policy 6.3.4	<p>Managing Activities in Rural Character Landscapes</p>
Policy 6.3.4.1	<p>Recognise that subdivision and development is unsuitable in many locations in Rural Character Landscapes and successful applications will need to be, on balance, consistent with the objectives and policies of the Plan.</p> <p>(SO 3.2.1, 3.2.1.1, 3.2.1.8, 3.2.5, 3.2.5.5, 3.2.5.6, and SP 3.3.2, 3.3.22, 3.3.23, 3.3.34, 3.3.35).</p>
Policy 6.3.4.10	<p>In the Upper Clutha Basin, subdivision and development maintains open landscape character where that is the existing character of the Rural Character Landscape.</p> <p>(SO 3.2.1, 3.2.1.7, 3.2.1.8, 3.2.5, 3.2.5.5, 3.2.5.6, and SP 3.3.23, 3.3.34, 3.3.35).</p>