

**BEFORE THE QUEENSTOWN LAKES  
DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991  
(the "Act")

**AND**

**IN THE MATTER** of the Queenstown Lakes Proposed  
District Plan – Variation to Chapter 21  
to introduce Priority Area Landscape  
Schedules

---

**Summary Statement of Evidence of**

**Duncan Lawrence White**

**For Sunnyheights Limited (Submitter #42 and Further Submission #235)**

---

**6 November 2023**

- 1 Submission #42 and further submission #235 from Sunnyheights Ltd relate to the whole variation to introduce the Priority Area Landscape schedules. Both also specifically relate to 21.22.22 – Dublin Bay Priority Area Schedule and 21.23.5 – Maungawera Valley RCL.
- 2 Sunnyheights Limited and RH and PH Masfen own properties off Dublin Bay Road and the Lake Hawea – Albert Town Road that are affected by the Dublin Bay Priority Area Schedule and the Maungawera Valley RCL Priority Area Schedule. These properties and adjacent properties in the same ownerships are run as a farm.
- 3 The submission opposed the ‘no landscape capacity’ rating as the scale of the landscape assessment for this variation was undertaken at a priority area scale and considered it inappropriate for such a high-level assessment to identify some areas as having no landscape capacity for certain activities and that there should be an ability to consider the effects at a site level without the blanket assumption that a priority area has no landscape capacity. It is noted that the planning and landscape architects’ joint witness conferencing (JWS) agreed on an amended landscape capacity rating that uses ‘extremely limited or no landscape capacity’ as the most restrictive of the landscape capacity ratings. This descriptor is preferred as it is less absolute, is not necessarily seen as a prohibition on particular types of development and recognises that the schedules were prepared at a broad priority area scale and that site and proposal specific factors will need to be considered in a specific landscape assessment prepared to support any resource consent application in the priority areas.
- 4 The submission sought clarification of the definition of intensive agriculture as the term must be understood clearly in order to apply the landscape capacity appropriately. The properties that are the subject of this submission are farmed, but not intensively, and it is normal for farming operations to change scales and intensities due to seasonal and market conditions and this ability should not be unduly restricted by an imprecise statement in the landscape schedule. The confirmation in the planning and landscape Joint Witness Statement (JWS) that intensive agriculture has the same meaning as Factory Farming in Chapter 2 of the proposed District Plan resolves this issue and is supported. With this definition changes sought to the landscape capacity for intensive agricultural are not required.
- 5 The changes made in relation to renewable energy generation and production forestry in the landscape JWS version are noted and resolve some of the concerns raised in the submission.