

B GILBERT – LANDSCAPE SUMMARY STATEMENT AND RESPONSE TO NEW EVIDENCE AND EXPERT CONFERCING – 13.10.2023

Bridget Gilbert for QLDC - Variation to Chapter 21 to introduce landscape schedules 21.22 and 21.23

Introduction

1. This statement provides an ‘update’, where necessary, of my evidence in chief and rebuttal position, following expert conferencing in the week of 2 October and my review of new lay evidence filed with the Panel. It:
 - 1.1 Provides a list of the PA Schedules that were agreed between the experts involved at expert conferencing (including a list of the PA Schedules that were not the subject of PA specific submitter evidence, but incorporate the ‘no landscape capacity’ rating change agreed at the expert conferencing¹).
 - 1.2 Provides a brief summary of the matters of disagreement for specific PA Schedules following expert conferencing.
 - 1.3 Provides brief commentary with respect to the three remaining points of disagreement in relation to the PA Schedules methodology following expert conferencing.
 - 1.4 Addresses matters raised in recently filed new lay evidence, by: Mr Kristan Stalker (submitter 110) (which relates to 21.22.6 Slope Hill PA ONF), and Sir Robert Stewart (submitter 84) (which relates to 21.22.15 Central Whakatipu Basin PA ONL).
2. I acknowledge that this is a lengthy ‘summary’, and that it introduces limited new evidence, but due to the timing of expert conferencing and filing of new evidence, consider it useful to provide it in advance of submitter presentations.

PA Schedules agreed during expert conferencing

3. The following PA Schedules were agreed at the expert landscape conferencing:

21.22.1 Peninsula Hill PA ONF
21.22.3 Kimiākau (Shotover River) PA ONF
21.22.6 Slope Hill PA ONF
21.22.15 Central Whakatipu Basin PA ONL
21.22.16 Eastern Whakatipu Basin PA ONL
21.22.23 Hāwea South North Grandview PA ONL

4. No landscape evidence was received from submitters in relation to the following PA Schedules. However, these PA Schedules have been amended to reflect the agreements recorded in paragraph 11 of the Final Joint Landscape and Planning Joint Witness Statement, 3 October 2023, that the ‘no landscape capacity’ rating terminology and definition should be changed to: “**Extremely limited or no landscape capacity** across all of the PA Schedules”.² Those schedules are:

¹ Final Joint Landscape and Planning Joint Witness Statement, 3 October 2023: [11].

² With the definition of **Extremely limited or no landscape capacity** described in the Final Joint Landscape and Planning Joint Witness Statement, 3 October 2023: Schedule 21.22 and 21.23 Preambles as: *there are extremely limited or no opportunities for development of this type. Typically, this corresponds to a situation where development of this type is likely to materially*

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- 21.22.2 Ferry Hill PA ONF
- 21.22.5 Waiwhakaata (Lake Hayes) PA ONF
- 21.22.8 Haehaenui (Arrow River) PA ONF
- 21.22.13 Queenstown Bay and Environs PA ONL
- 21.23.3 West of Hāwea River PA RCL
- 21.23.4 Church Road – Shortcut Road PA RCL

PA Schedules – matters of disagreement following expert conferencing

21.22.12 Western Whakatipu Basin PA ONL

5. Mr Steve Skelton³ considers that the **extremely limited or no** landscape capacity rating for urban expansions in the PA should be qualified to acknowledge that infill urban development can occur near Fernhill.
6. In my view, Mr Skelton’s preferred wording signals that urban expansion into the PA ONL is likely to be appropriate (from a landscape perspective), in this part of the PA.
7. I disagree with this, and consider it fundamentally inappropriate to signal that urban expansions into a PA ONL will be appropriate from a landscape perspective. This is for the following reasons:
 - 7.1 Applying the definition of urban expansions set out in the Schedule 21.22 Preamble, I consider that such development will inevitably mean that at least the part of the PA ONL in and around the location of the urban expansion will fail to qualify in terms of naturalness values as an ONL.⁴
 - 7.2 Such an outcome does not protect landscape values.

21.22.14 Northern Remarkables PA ONL

8. Mr Stephen Brown⁵ considers that the landscape capacity qualifying comments in relation visitor accommodation, tourism related activities and rural living should be amended to remove reference to the ‘reasonably difficult to see test’ for views from the Kawarau River, Twin River Trail, Bridesdale, Shotover Country and Lake Hayes Estate. Mr Brown is concerned about the potential for my rebuttal wording to result in a simple test of visibility as opposed to an evaluation that focuses on integration and the avoidance of effects on key landscape qualities of the PA. For these reasons, Mr Brown prefers the wording set out in his EIC.

compromise the identified landscape values. However, there may be exceptions where occasional, unique or discrete development protects identified landscape values.

³ On behalf of Passion Developments limited (OS 186).

⁴ I discuss this in more detail in my rebuttal evidence at [9.23] and my evidence in chief at [6.14](a).

⁵ on behalf of Queenstown Park Limited (OS 171).

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9. I do not support the wording recommended by Mr Brown. While I accept that my rebuttal wording references the importance of visibility, I consider that other elements of the qualifying comments speak to the integration of any future development into the landscape via reference to matters such as: confining development to the lower lying terraces and floodplains; a modest or sympathetic scale; a low key 'rural' or 'non-urban character'; integrating landscape restoration and enhancement and enhancing public access.
10. In my opinion, the impression of the lower lying part of the PA as reasonably undeveloped is of key importance to the landscape character and visual amenity values experienced by the audiences signalled in the text (which includes urban parts of the district, the highly popular Queenstown Trail and popular scenic areas such as the Kawarau River and adjacent open space areas). I consider that Mr Brown's recommended wording will undermine the importance of this characteristic of the landscape of the PA ONL as experienced by these audiences and for this reason, is inappropriate.

21.22.21 West Wānaka PA ONL

11. Mr James Bentley⁶ considers that the reference to development being 'barely discernible' should be amended to 'reasonably difficult to see' in the landscape capacity qualifying comments for rural living.
12. I acknowledge that Mr Bentley's wording corresponds to the policy test in PDP 6.3.3.1(b). However, relying on my knowledge of the area (which includes field work and a detailed review of the consented development in the area as part of preparing evidence for the Glendhu Bay Appeal), I consider that the 'barely discernible' terminology is appropriate for future rural living in the West Wānaka PA ONL.
13. This is because of the level of built development and other modification (for example, golf course and jetty activity) that is anticipated as part of the consented environment at Glendhu Bay. In my opinion, the consented environment is extremely close to the limit that the landscape can successfully absorb, meaning a more stringent visibility test for future rural living development is appropriate to manage cumulative adverse landscape effects.

PA Schedules methodology - matters of disagreement following expert conferencing

'Key Landscape Values' vs 'Summary of Landscape Values'

14. Mr Skelton considers that the Summary of Landscape Values section of the PA Schedules should be deleted, with the rating of the Physical, Associative and Perceptual attributes and values 'relocated' to the end of the relevant subsection in the main body of the PA Schedule. I consider that the Summary of Landscape Values is a helpful part of each PA Schedule and that it should be retained.

⁶ on behalf of Darby et al (OS 176).

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15. I consider that the ‘key landscape values’ approach supported by Mr Espie and Ms Smetham runs the risk of the PA Schedules being interpreted as ‘hierarchical’ technical documents in which the ‘key landscape values’ section becomes the primary focus.
16. This would be technically incorrect given the way that the PA Schedules have been drafted to be read as a whole, and I note that this was agreed as the appropriate way to use the PA Schedules by the landscape experts at their conferencing on Monday 2 October 2023.⁷
17. Further, based on my detailed landscape assessment of fifteen of the PAs (and moderation of the remaining fourteen PAs), it is my view that the PAs encompass a complex range of landscape attributes and values. In my opinion, attempting to articulate those values in a short summary statement of key landscape values will likely overlook some of the important attributes and values. In my view, such an outcome could lead to a failure to: protect the landscape values of the PA ONF/L; or maintain or enhance the landscape character and visual amenity values of a PA RCL.

Including a summary statement of Physical Values

18. Mr Espie and Ms Smetham consider that the PA Schedules should reference the specific physical attributes and values in the Summary of Landscape Values that are key to the particular PA and require protection (or maintenance/enhancement) in accordance with the relevant policy direction.
19. In my opinion, the PA Schedules comprise a summary of landscape attributes and values that draws from extensive landscape and other expert assessment work. This is acknowledged in the Landscape JWS Monday 2 October 2023 at paragraph 4(c). All of the high value attributes (and values) described in the Physical Values section of schedule are of relevance, as signalled in the Summary of Physical Values text.
20. Given that the PA Schedules are technical documents that will primarily be referenced and interpreted by landscape experts to assist plan users and decision makers, I consider that landscape experts will understand which of those entries relate to ‘high value’ physical landscape attributes (and values).
21. In addition, the Physical Values section of each PA Schedule is informed by other expert disciplines including geomorphologists and ecologists, with those experts supporting the wording (and structuring) of the PA Schedule as proposed in the notified version (and which is carried through in the Council rebuttal version of the PA Schedules).
22. I note that the example PA Schedule attached as Appendix 1⁸ to the Landscape JWS Monday 2 October that has been reworked by Mr Espie and Ms Smetham overlooks some aspects of the Physical Values section that were considered to merit reference by the expert landscape, geomorphologist and ecologist team⁹.

⁷ See Landscape JWS, dated 4 October: [4](a).

⁸ i.e. 21.22.12 Western Whakatipu Basin PA ONL.

⁹ For example (and focussing only on the important landforms and landtypes section of the Physical Values of the PA Schedule): the exposed rocks and bluff outcrops throughout the PA, the Ben Lomond saddle and its role in separating the Whakatipu Valley from the Moke Creek Valley, elevated ridgeline spurs extending southwards from the Ben Lomond saddle and taking in Pt 1121 and Cemetery Hill (812m, also known as ‘Bobs Peak’) immediately west of Queenstown, the extensive ridgeline descending south-westwards from Te Taumata o Hakitekura (Ben Lomond) to Whakatipu Waimāori (Lake Whakatipu (ONL)) and taking in Pt 1580, Pt 1395, Pt 1335, Pt 1138 and Pt 850, the small scale roche moutonnée landform (480m) towards the western edge of the PA, Whakatipu Waimāori (Lake Whakatipu (ONL)), the glacial till deposits at the toe of the steep mountain slopes forming shallow

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- 23.** I expect that this is inevitable when summarising physical values particularly for the PA ONF/L, given the large number and wide range of attributes and values that underpin the Physical Values of these parts of the district. By way of explanation, the Physical Values part of the 21.22.13 Western Whakatipu Basin PA Schedule covers approximately four and half pages of the approximately ten pages of the main body of the PA Schedule.
- 24.** Further, and more importantly, in my opinion, it is the more natural aspects of the landscape that comprise the foundation of the landscape values associated with each PA. For this reason, I consider that attempting to summarise such attributes and values (beyond that already integrated in the drafting of the PA Schedules as a whole) is inappropriate.

Response to recent lay evidence

- 25.** Mr Kristan Stalker has prepared a statement of evidence in relation to 21.22.6 Slope Hill PA ONF. Mr Stalker requests that a ‘limited landscape capacity’ rating is applied to commercial recreation activity, earthworks, farm buildings and rural living.
- 26.** My updated version of 21.22.6 Slope Hill PA ONF (attached in Appendix 1) recommends a rating of ‘very limited landscape capacity’ for commercial recreation activity, earthworks and farm buildings. An ‘extremely limited landscape capacity’ rating is recorded for rural living.
- 27.** Relying on my knowledge of the area (including field work and the preparation of landscape evidence in relation to Te Pūtahi Ladies Mile Masterplan), I consider that the above landscape capacity ratings are appropriate. My evidence in chief discusses this in more detail in Appendix 2(e). In summary, ONFs such as Slope Hill roche moutonnée typically have a particularly high sensitivity to earthworks and built development change due to their: limited size/extent; geomorphological values; and open, elevated, steep and exposed nature.
- 28.** I also note that Ms Smetham (landscape expert for Milstead Trust), agreed with my landscape capacity ratings as recorded in paragraph 7 of the Landscape JWS 21.22.6 Slope Hill, dated 4 October 2023.
- 29.** In so far as it is of relevance to the Variation, my rebuttal evidence (and amendments to 21.22.15 Central Whakatipu Basin PA ONL Schedule) addresses the issues raised in the evidence of Sir Robert Stewart, dated 10 October 2023.

Bridget Gilbert

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localised shelves and throughout the more gently sloping lower reaches of gullies within the PA, a localised area of ribs of bedrock on the lower-lying slopes to the west of Sunshine Bay, the elevated saddle-like landform between Pt 781 and Ferry Hill, the scarps and hummocky topography on the southeast slopes of Queenstown Hill and the eastern side of Sugar Loaf which are indicative of historic large-scale landslides.