

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the Resource Management Act 1991

In the matter of of a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23

---

**Evidence of James Bentley**

11 September 2023

---

**Appellant's solicitors:**  
Maree Baker-Galloway | Rosie Hill  
Anderson Lloyd  
Level 2, 13 Camp Street, Queenstown 9300  
PO Box 201, Queenstown 9348  
p + 64 3 450 0700  
maree.baker-galloway@al.nz | rosie.hill@al.nz

**anderson  
lloyd.**

## **Qualifications and experience**

- 1 My full name is James Arthur Bentley. I am an Associate Partner at Landscape Architect at Boffa Miskell Limited (BML), a national firm of consulting planners, ecologists and landscape architects. I am a registered member (2010) of the New Zealand Institute of Landscape Architects (NZILA) as well as an elected chartered member (London, 2002) of the British Landscape Institute (CMLI). I hold a post-graduate diploma (2000) in Landscape Architecture as well as a Bachelor of Arts with Honours Degree in Landscape Architecture (1998) from the Cheltenham and Gloucester College of Higher Education (now the University of Gloucestershire) in the UK. I am also a member of the Resource Management Law Association (RMLA)
- 2 I have practised as a landscape architect for over 20 years on a wide range of projects including landscape and visual effects assessments, landscape and natural character studies and research projects. I have also been recently lecturing at Lincoln University to third year students on landscape planning matters.
- 3 I have recently been assisting Marlborough District Council in their appeals concerning landscape and natural character matters for their Proposed Marlborough Environment Plan, which included drafting their landscape schedules that underpin the outstanding natural landscapes. I have undertaken this same landscape exercise for Selwyn District Council and numerous other councils concerning coastal natural character.
- 4 I have prepared many landscape, natural character and visual amenity effects-based assessments and evidence ranging from retirement villages, different forms of aquaculture, hydro schemes, plan changes and subdivisions. A number of which have been in the Queenstown context.

## **Code of Conduct for Expert Witnesses**

- 5 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code and I agree to comply with it. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **Involvement in Proceedings**

- 6 Darby Partners Limited have asked me to prepare independent expert evidence in relation to four of the proposed District Plan Priority Area (**PA**)

Schedule of Landscape Values in relation to their existing asset areas. This evidence specifically concerns landscape matters on the following PA schedules that appear within the Whakatipu area and Upper Clutha area:

- Whakatipu Area: 21.22.1 PA ONF Peninsula Hill (relating to submitter **Coneburn Preserve Holdings Limited and Henley Downs Farm Holdings Limited**).
- Whakatipu Area: 21.22.16 ONL Eastern Whakatipu Basin (relating to submitter **Glencoe Station Limited and Glencoe Land Development Company Limited**).
- Whakatipu Area: 21.22.18 PA ONL Cardrona Valley (relating to submitter **Soho Ski Area Limited and Blackmans Creek Holdings No. 1 LP**); and
- Upper Clutha Area: 21.22.21 PA ONL West Wānaka (relating to submitter **Glendu Bay Trustees Limited**).

7 As part of the preparation of this evidence, I undertook a series of site visits on 21 and 22 August 2023 along with my colleague Liz Gavin, a landscape architect at BML. The weather was fine and sunny. I am broadly familiar with the landscapes of Queenstown and the PA locations through other previous work undertaken in the area.

8 Notably, the site visits were to specific parts of each PA where Darby Partners retain a specific interest. These are outlined in the table below:

<b>PA Schedule</b>	<b>Area visited</b>
Peninsula Hill	The southern area of Peninsula Hill, beyond the urban growth boundary, including the Jacks Point Zone that is included within the PA overlay.
Eastern Whakatipu Basin	The north section of the PA concerning the Glencoe homestead and northern and western facing slopes of Mt. Beetham.
Cardrona Valley	South-western part of the PA, south of Cardrona village and including the Cardrona Ski Area Sub-Zone.
West Wānaka	The area around Parkins Bay and Glendu Bay close to the Wānaka-Mount Aspiring Road.

- 9 These areas are identified within the relevant PA within the **accompanying Graphic Supplement** that supports my evidence. I have also included a series of photographs of these areas.

### **Scope of evidence**

- 10 In preparing this evidence I have reviewed the following reports and statements:

- Landscape Evidence of Bridget Gilbert dated 11 August 2023.
- Landscape Evidence of Jeremy Head dated 11 August 2023.
- Section 42A report of Ruth Evans dated 11 August 2023.
- Appendix 1: Recommended amendments to the PA Schedules, and preambles contained within the Planning Evidence of Ruth Evans.
- Relevant chapters of the proposed District Plan, including Chapter 2 (Definitions); Chapter 3 (Strategic Direction); Chapter 6 (Landscapes and Rural Character); Chapter 21 (Rural) and Chapter 24 (Whakatipu Basin: Landscape Character Units).
- Joint witness statements (JWS): One in relation to Topic 2: Rural Landscapes, dated 29 October 2020 and one relating to Topic 23 – Rezoning Appeals (Group 2) on the ONL West Wanaka, dated 24 June 2021. Both of these were attended by my colleague, Yvonne Pfluger.
- Appendix C1: ONF, ONL and RCL Priority Area Landscape Schedules Methodology Statement, May 2022.
- Appendix C2: Appendices (May 2022).
- Te Tangi a te Manu (2021) Landscape Assessment Guidelines (TTatM).

- 11 My evidence is structured as follows:

- Purpose of schedules.
- Review of the approach and method employed concerning the PA Schedules in relation to the Darby related entities.
- Preamble to the PAs.
- Landscape Capacity.
- Mapping.

- Specific commentary around each of the four PA's and requested relief sought.

### **Purpose of Schedules**

- 12 Section 3 of the evidence of Bridget Gilbert helpfully outlines the background and genesis of the PA Schedules. Whilst I was not personally involved in these, my colleagues, Yvonne Pfluger and Chris Ferguson participated in Topic 2.2 along with others to undertake further facilitated expert witness conferencing. A JWS<sup>1</sup> was produced because of this.
- 13 The strategic imperative within Chapter 3 for the development of the PA Schedules is the Values Identification Framework detailed within SPs 3.3.36 to 3.3.42. This framework is one of the measures within the PDP to achieve strategic objectives 3.2.5 and 3.2.5.1.
- 14 Part 3.3.45-3.3.46 (Landscape Assessment methodology) of Chapter 3 outlines the need for a landscape assessment to be undertaken for any proposed plan change, resource consent or notice of requirement within a PA to specifically:
- i. identify landscape attributes and values; and*
  - ii. assess effects on those values and on related landscape capacity'*
- 15 This is consistent with the comments made by Bridget Gilbert: *'...that site specific assessments will need to assess and rate the relative values present on a site as part of a plan change or resource consent application'*<sup>2</sup>.
- 16 Brad Coombs in his Peer Review<sup>3</sup> mentions:
- 'With this experience and knowledge of the District and the resource management challenges for its landscapes, the Schedule Authors have used their best professional judgement in relation to assessing the capacity of the PAs to absorb future change. The landscape capacity 'ratings' are indicative for each of the PAs. It is anticipated that any specific proposal for use or development within a PA would be accompanied by a detailed landscape and visual assessment which would provide more detail and analysis of the landscape values and the level of fit of a particular proposal,*

---

<sup>1</sup> Evidence of Bridget Gilbert, Paragraph 3.7 and taken from [2019] NZEnvC 205 [525].

<sup>2</sup> Evidence of Bridget Gilbert, Paragraph 8.40.

<sup>3</sup> Methodology Statement Appendices: Appendix E: Peer Review Report

*than can be provided within a District wide values assessment as has been carried out in response to the Topic 2 directions.*

*The Landscape Schedules provide the starting point for a more detailed assessment of the appropriateness of an application for use or development within the identified PA10. The schedules should be read in conjunction with any relevant provisions within the PDP. It is anticipated that more detailed landscape and visual, expert and Mana whenua input may be required, dependant on the scope and nature of an application.'*

- 17 Following this understanding of Chapter 3, I agree with Bridget Gilbert and the peer review of Brad Coombs, that the Landscape Schedules are a starting point for a more detailed assessment of a specific proposal. This is typical of how other schedules in other districts work.
- 18 This is primarily due to the scale at which the PA's cover. In most situations, the scale of the PAs is typically large, and can, for example cover an entire large valley system (such as the Cardrona valley) or include an entire mountain range (such as the Crown Range). Therefore, the scale of the PA is much larger than what would normally be the scale assessed for a specific activity proposal. It is, in essence, reflective of a District-wide scale, suitable for a District Plan and therefore an appropriate scale for the task<sup>4</sup>.
- 19 As such, I agree that due to the 'high level' of the PA scale, any landscape capacity rating and the applicable categories for the same, would need to be appropriately flexible, as it is not realistic or plausible to undertake a finer-grained assessment of values or capacity appreciation at this scale.
- 20 Very much aligned with this is the *range* and *scale* of activities listed in the capacity section<sup>5</sup>. I comment on this aspect in further detail later in my evidence, however the principal point I am making here relates to the *range* or type of activity listed (such as commercial recreational activities and urban expansions) and the *range* as in the *scale* of the activity, which also includes size, form, location, design and colour.
- 21 For the former, I understand that the range of activities derives from the lists in PDP 3.3.38(c) and 3.3.41(g), which specifies types of activities that may be considered within these PAs. Relating to this point, I do not agree with the definition for all activities, for example '*tourism related activities*' means

---

<sup>4</sup> Decision No. [2019] NZEnvC 160 (Topic 2 – ONL & ONF Maps) Decision 2.1, paragraph 80(a) (ii).

<sup>5</sup> I note that the range of activities are listed in Chapter 3, 3.3.38 (c).

the same as ‘resort’ activities’ in the PDP<sup>6</sup>. I consider that it would be preferable to delete this meaning and to rely on a statement within the preamble that states something along the lines that, for the purposes of the schedules, activities are not strictly defined in accordance with Chapter 2 and that there is a deliberate openness to the language to allow for specific landscape assessments to apply, as necessary to the context required for any particular proposal. I consider that this statement would then allow for a full range of tourism related activities to be considered.

- 22 This leads me directly to the latter ‘range’, where any type of activity listed could take on a multitude of various guises, and where scale is important, and could include large built structures to very small individual or clusters of development imperceptible in the landscape.
- 23 Landscape capacity ratings therefore needs to respond to the overall purpose of the Schedules, whilst being sufficiently capable and flexible of considering a broad consensus of related activities and their future scale, location, design etc.

### **Review of Approach and Method**

- 24 The approach and methodology employed for the PA Landscape Schedules is contained within Appendices C1 and C2 (May 2022) of council’s Section 32 Report and briefly within section 4 of the evidence of Bridget Gilbert. Section 3 of the PDP also sets out the guiding policy.
- 25 I can confirm that I have read these, and broadly agree<sup>7</sup> with the approach taken. This is consistent with best practice as outlined in TTatM.
- 26 One matter that is of importance is accurately identifying the relevant landscape values, characteristics and associated descriptions of each PA.
- 27 Best practice states: *‘While landscape assessment methods vary, they are all based on landscape character and values. Character is an expression of the landscape’s collective attributes. Values are the reasons a landscape is valued. Values, though, are embodied in attributes. Effects are consequences for a landscape’s values resulting from changes to*

---

<sup>6</sup> I understand that the definition of **tourism related activities** has the same meaning as ‘resort’ in Chapter 2 of the PDP: *‘means an integrated and planned development involving low average density of residential development (as a proportion of the developed area) principally providing temporary visitor accommodation and forming part of an overall development focused on onsite visitor activities’.*

<sup>7</sup> Other than the capacity ratings and descriptions.

*attributes. The landscape's values are managed through managing such attributes'.<sup>8</sup>*

28 Landscape attributes relates to the physical, associative and perceptual dimensions of a landscape<sup>9</sup>. *'Landscape values are the various reasons a landscape is valued—the aspects that are important or special or meaningful. Values may relate to each of a landscape's dimensions—or, more typically, the interaction between the dimensions. Values can relate to the landscape's physical condition, meanings associated with certain landscape attributes, and a landscape's aesthetic or perceptual qualities. Importantly, landscape values depend on certain physical attributes. Values are not attributes but are embodied in attributes'.<sup>10</sup>*

29 It is important to note that landscape values identification is not just the preserve of landscape experts but informed by a variety of different people. As Bridget Gilbert points out *'It is well established (and goes without saying) that 'landscape' affects us all, with most people having an interest in landscape to at least some degree and that non-landscape experts have an important role in framing landscape values'<sup>11</sup>*. TTatM states<sup>12</sup> that the role of the landscape expert is to assist decision-makers by:

- *'providing an objective account of relevant landscape facts against which to test others' opinions.*
- *providing an unbiased and independent expert opinion against which the range of community views might be compared.*
- *assessing landscape matters in the context of the relevant provisions.*
- *analysing, interpreting, and explaining landscape matters that other participants may lack the training to articulate'.*

30 I am aware that the methodology has been informed by community consultation, however through the production of this evidence, I became aware of and note the deficiencies alleged in respect of that process by others. I defer to my colleague, Chris Ferguson to outline this fully.

---

<sup>8</sup> Te Tangi a te Manu [2022], paragraph 5.02.

<sup>9</sup> Refer to paragraphs 2.5 – 2.21 of the Methodology Statement [May 2022].

<sup>10</sup> Te Tangi a te Manu [2022], paragraph 5.08.

<sup>11</sup> Bridget Gilbert evidence, paragraph 4.2.

<sup>12</sup> Te Tangi a te Manu [2022], paragraph 2.23

- 31 Despite this, I support the approach outlined within Chapter 4 of evidence of Bridget Gilbert.
- 32 Allied to community views informing landscape values, is acknowledgement that landscape values change over time. As outlined in TTatM, *'Landscape means the natural and physical attributes of land together with air and water which change over time and which is made known by people's evolving perceptions and associations'*<sup>13</sup>.
- 33 Typically landscape values are positive, however, some values may be somewhat degraded and could be enhanced in future through planning proposals, and opportunities for the same should be recognised, such as for example, enhancing public access, conservation and naturalness values.
- 34 Inherently, any landscape schedule needs to be pitched at a sufficiently high level to ensure for the continued evolution of landscape values. The PA schedules therefore represent a certain scale, at a certain point in time, and allows for further, nuanced amplification of values through more detailed assessment work of site-specific proposals. It is also observed that the PA's are not intended to be in and of themselves, landscapes per se; they may be part of a landscape (as landscapes can nest within landscapes<sup>14</sup>), so some PAs might only cover part of a defined ONF or ONL.
- 35 Further, it is acknowledged that the PAs are identified as those areas subject to development pressure, and do not include those which are more sacrosanct. The context of each PA plays an important part when understanding landscape values, which in turn corresponds to that PA's 'absorption capacity'. For example, a PA close to an urban area will retain specific sensitivities relating to types of development than more remote or disconnected landscapes.
- 36 Within a separate section of my evidence, I explore in further detail each relevant PA (within the scope of my evidence regarding Darby related entities).

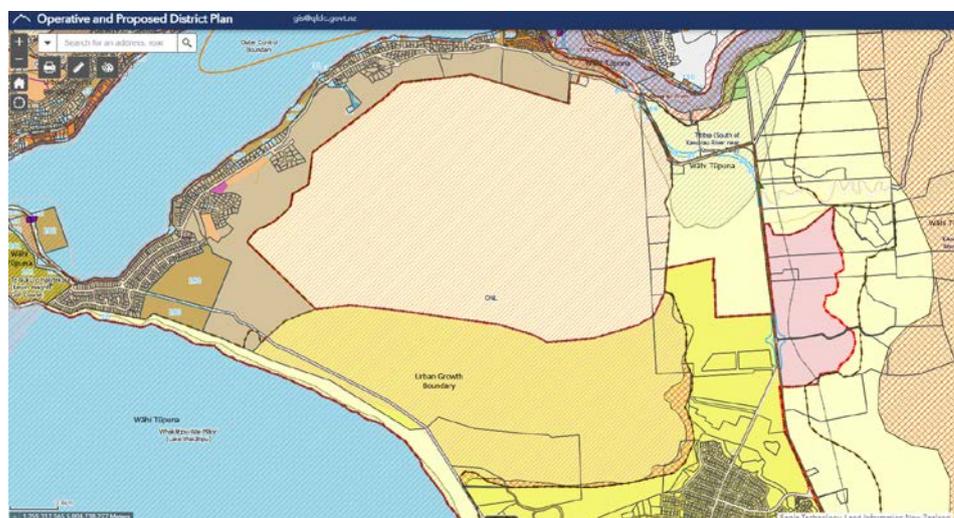
### **Preamble to the PAs**

---

<sup>13</sup> Te Tangi a te Manu [2022], paragraph 4.22 and referenced from Mount Cass Wind Farm' [2011] NZEnvC 384, paragraph 300–301.

<sup>14</sup> Te Tangi a te Manu [2022], paragraph 5.16.

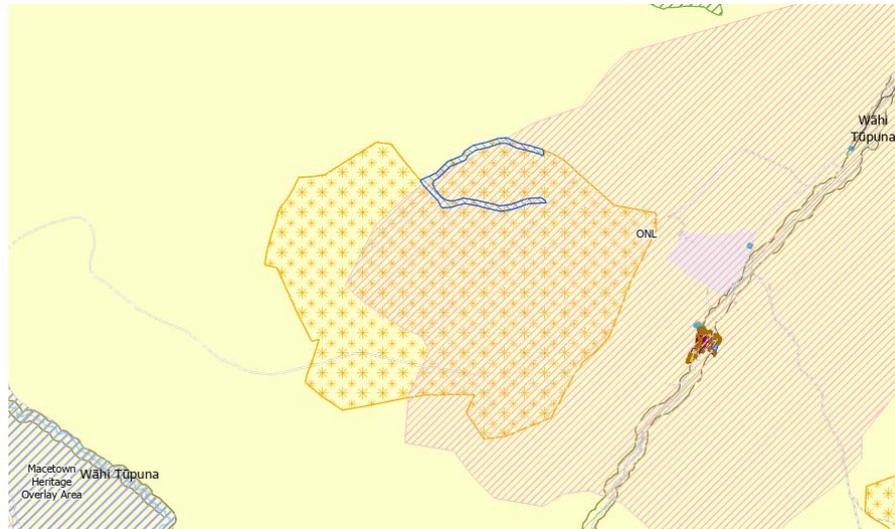
- 37 Appendix 1 of Ruth Evans' Section 42A report outlines the recommended amendments to the PA Schedules and outlines a preamble. I will comment on each relevant PA Schedule later in my evidence, however, under this section of my evidence, I will comment on the preamble.
- 38 The preamble provides a helpful understanding to the Schedules. It references the point that a *'finer grained location-specific assessment of landscape attributes and values will typically be required for plan development or plan implementation purposes (including any plan changes or resource consent applications). The PA Schedules are not intended to provide a complete record and other location specific landscape values may be identified through these finer grained assessment processes'*.
- 39 Further assessment for specific activities and development may reveal further landscape values that are not captured. I accept and agree with this.
- 40 The preamble references plant and animal pests and states that they are a *'negative landscape value'*. Whilst I do not disagree with the intent of this statement, it would be preferable to state that these pests are a 'detractor' to landscape values.
- 41 Helpfully, the preamble includes commentary that the *'PA Schedules have been prepared to reflect that the PA mapping extends beyond the Rural Zone'*. This statement therefore implies, that some PA's extend into zones that are 'other than Rural Zone'. This is the case for PA 21.22.1 (Peninsula Hill), which partly extends into the Jack's Point Zone<sup>15</sup> and beyond the Urban Growth Boundary. Refer to image below, which is an excerpt of the QLDC PDP Planning Map (Peninsula Hill).



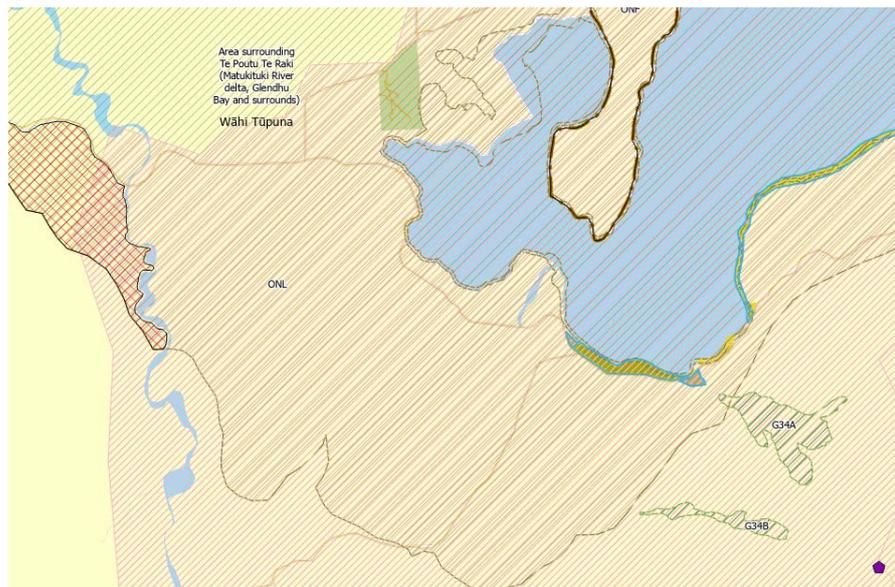
---

<sup>15</sup> Referred to as an 'exception zone' in Chapter 3.

- 42 This is also the case for 21.22.18 (Cardrona Valley) which includes a multitude of zones associated with the Cardrona village area (which includes a settlement zone). The southwestern part of the PA, despite its rurally zoned basis, also extends into the Ski-Area Sub Zone<sup>16</sup> around Cardrona Alpine Resort. Refer to image below, which is an excerpt of the QLDC PDP Planning Map (SASZ).



- 43 Finally, this is also the case for 21.22.21 (West Wanaka) where the ONL includes the campground area (community purpose zone). Refer to image below, which is an excerpt of the QLDC PDP Planning Map (Glendu).



- 44 It is understood that the Jacks Point Zone and the Ski-Area Sub Zone are examples of 'Exception Zones' under the PDP framework. My

---

<sup>16</sup> Referred to as an 'exception zone' in Chapter 3.

understanding of the Exception Zone is that development that is anticipated in accordance with that Zone is generally accepted as protecting the landscape values of the ONL or ONF.

45 The preamble continues to state:

*'The application of the PA schedules is as follows:*

*Other than the Ski-Area Sub Zone (see below), the PA schedules apply (as relevant) to any proposal requiring resource consent in the Rural Zone, including the Rural Industrial Sub Zone.*

*The PA schedules apply (as relevant) to any activity in the Ski-Area Sub Zone that is not provided for by that sub-zone.*

*The PA schedules do not directly apply to proposals in other zones, but may inform landscape assessments for proposals involving any land within a PA'.*

46 My understanding of this is that where a PA includes land that is not rurally zoned (other than the ski area sub zone and the rural industrial sub zone), the PA schedules do not directly apply to activities provided for by those zones. I defer to the evidence of Mr. Ferguson in this regard and particularly regarding his comments regarding the preamble.

### **Landscape Capacity**

47 Landscape capacity is an *'estimate of how much of [an] activity could be accommodated while still retaining the specified values'*<sup>17</sup>.

48 *'The purpose of this aspect of the PA Landscape Schedules project is to provide guidance to plan users by assessing and recording the landscape capacity of the PA for subdivision, use, and development activities for a range of different land uses'*<sup>18</sup>.

49 TTatM mentions that an evaluation of (landscape) capacity is *'necessarily imprecise because they estimate a future'*<sup>19</sup>.

50 As outlined within the preamble to the Schedules in Appendix 1 of Ruth Evans' Section 42A report: *'Landscape capacity is not a fixed concept, and it may change over time as development occurs or landscape*

---

<sup>17</sup> Te Tangi a te Manu [2022], paragraph 5.49.

<sup>18</sup> Appendix C1 Methodology Statement, May 2022 paragraph 3.1

<sup>19</sup> Te Tangi a te Manu [2022], paragraph 5.46.

*characteristics change. In addition, across each PA there is likely to be variation in landscape capacity, which will require detailed consideration and assessment through future plan changes or resource consent applications’.*

- 51 Despite the imperfection of ‘capacity’, comments around this are extremely helpful when considering future development opportunities, especially in a District Plan perspective. The Court outlined:

*[127] Landscape capacity cannot be known unless there has been an identification of the landscape character values and their importance (i.e. knowing what the landscape is valued for and why). Evaluating a landscape is inherently an exercise where different landscape experts have different opinions. That is why it is important that a district plan identifies both landscape values and landscape capacity in that both of these are part of the plan's intended statutory authority in regard to ss6(b) and 7(c).<sup>20</sup>*

- 52 As outlined earlier, the relationship between values and capacity are therefore critical in understanding a PA's ability to accommodate further change.

- 53 Chapter 3 contains its own definition of landscape capacity as it relates to PA's<sup>21</sup>:

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;”*

- 54 Of critical importance, is ensuring that the values and overall landscape descriptions accurately portray the PA at a relevant scale. In my view, this includes existing consented developments and identified statutory planning instruments (such as Structure Plans, zones etc),<sup>22</sup> and potentially identifying opportunities for future enhancement where some landscape values are degraded.

---

<sup>20</sup> [2019] NZEnvC 205 paragraph 127.

<sup>21</sup> PDP 3.1B.5 b page 3-2

<sup>22</sup> This is helpfully further amplified under paragraph 5.15 of Bridget Gilbert's evidence.

55 Further, a clear understanding of the methodology employed to ‘capture’ capacity needs to be transparent. Commentary on this is contained within Appendix C1 and further expanded upon in the PA Schedule preamble.

56 From experience in undertaking this type of work for other projects, I agree with paragraphs 3.8 and 3.9 of Appendix C1:

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

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

57 This is consistent with the purpose of the Schedules outlined earlier. I do, however, retain some reservation around the language used to describe the available ‘capacity’ of each type of development, notably ‘some’; ‘limited’; ‘very limited’ and ‘no’ capacity (along with Bridget Gilbert’s ‘extra’ rating of ‘very limited to no’ capacity’). This extra rating creates effectively a five-point scale for landscape capacity as applied to the PAs and creates an extra level of complexity for plan users.

58 It would be preferable for the used terms to be consistent with terms already used within the District Plan, such as within the Whakatipu Land Use Study and the numerous Landscape Character Units (LCU’s) used, where very low to very high has been used<sup>23</sup>.

59 I note in Appendix C1, the following: *‘The choice of wording here is deliberate. Given the uncertainty around what a specific landuse might entail, the authors have not applied the seven-point rating scale (described above) but favoured a ‘less absolute’ terminology’.* And *‘Further the high value landscape context of the PA ONF/Ls (RMA s6(b) and PA RCLs (RMA s7(c)), means that they are inevitably sensitive to landuse change (albeit to*

---

<sup>23</sup> For example, within each of the LCU’s (and Chapter 24 of the PDP), towards the end of the table is a column referring to ‘Capability to absorb additional development’, and throughout all LCU’s, terms such as very low, low, moderate-low, moderate, moderate-high and high are used. It is unclear whether the meaning between ‘capability to absorb change’ and the PA’s ‘landscape capacity’ are meant to mean different things or are essentially the same and may come down to semantics. I also appreciate that within the LCU’s they are only assigning capacity ratings concerning rural living, and no other activity.

*varying degrees). For this reason, the choice of terminology intentionally favours a relatively cautious approach to landuse change’.*

60 Whilst I can fully appreciate that formulating a landscape capacity methodology is not straightforward, and note the difficulties<sup>24</sup>, in my view, using terms and a scale that are already accepted, would be preferable<sup>25</sup>.

61 I am aware that the 7-point scale in TTatM is prefaced around describing the magnitude of an effect, and how this ‘effect’ can be interpreted into Resource Management terminology<sup>26</sup>. Further, that despite the LCU’s ‘*capability to absorb change*’ focus on ‘*rural living*’ only, the PA’s list of activities is more generic (for example ‘*commercial recreational activities*’ could include campgrounds, bike parks, golf courses) which broadens the range of an activity’s specificities.

62 Furthermore, it is not clearly apparent to me how ‘no capacity’ can be determined, when the schedules are typically ‘*high level*’. This can relate to, for instance, the unknown scale of such development, such as ‘*visitor accommodation and tourism related activities*’, or where in a specific part of the PA those activities are to be located; or upon what conditions, and what mitigation or positive enhancement effects on values and character might be part of a proposal, are unknown. The ‘no’ capacity is, in my view too definitive and contrary to the ‘*less absolute*’ terminology within Appendix C1. The revised preamble for Schedule 21.22 under the heading Landscape Capacity<sup>27</sup> appears to agree with this, where it states:

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

63 I have reviewed the capacity ratings and their descriptions and propose that these are reconsidered as shown in the table below. What the table I present below demonstrates is consistency of language with the 7-point scale used in the PDP already (for the LUC’s and to rate landscape values), as well as used in TTatM<sup>28</sup>. The table also includes a broader interpretation of types of capacity at both ends of the spectrum (i.e., the opposite of very low is very high, with moderate in the middle). This broader spectrum

---

<sup>24</sup> As expressed in Section 3 of the Methodology Statement [May 2022].

<sup>25</sup> Such as the seven-point scale in TTatM [paragraph 6.21] and the LCUs.

<sup>26</sup> i.e., less than minor, minor, more than minor.

<sup>27</sup> Appendix 1: Recommended amendments to the PA Schedules, and preambles

<sup>28</sup> Although as noted, used primarily to assess effects.

acknowledges that for more sensitive landscapes, such as ONFs and ONLs, capacity will most likely be more centred on the lower half of the table. This, in my view assists to calibrate capacity and gives meaning to terminology used.<sup>29</sup>

64 Whilst I am not advocating perfection, I present this table with a view of endeavouring to retain a level of consistency to users of the PDP. Careful language has been considered for the description.

Table 1: Absorption capacity ratings for Priory Areas (PA)s	
Landscape Capacity	Description <sup>30</sup>
<b>Very High</b>	<i>The area is able to accommodate a substantial amount of new development, providing it is absorbed in a manner that protects identified landscape values.</i>
<b>High</b>	<i>The area is able to accommodate a high amount of new development, providing it is able to be absorbed in a manner that protects identified landscape values.</i>
<b>Moderate / High</b>	<i>The area is able to accommodate moderate to high amounts of development, providing it is able to be absorbed in a manner that protects identified landscape values.</i>
<b>Moderate</b> <i>(potentially 'some' in preamble)</i>	New development may be accommodated provided it has regard to the character and sensitivity of identified landscape values. There are landscape constraints and therefore the key landscape values must be retained and enhanced.
<b>Moderate / Low</b> <i>(potentially 'limited' in preamble)</i>	A moderate to low amount of development could be accommodated in limited situations, whilst still protecting all identified landscape values. The landscape is close to its development capacity, therefore sensitively located and designed development would be appropriate.
<b>Low</b> <i>(potentially 'very limited' in preamble)</i>	Development has the potential to generate considerable adverse effects on landscape values and/or available views. Occasional, small-scale development may be possible, providing it has regard to the character and sensitivity of the landscape and continues to protect all identified landscape values.
<b>Very Low</b> <i>(potentially 'very limited to no', and 'no' in preamble)</i>	There are very limited or no opportunities for development. Any development possible would be very occasional, exceptional, unique and very small-scale/ discrete and that it continues to protect all identified landscape values.

Landscape capacity within ONLs and ONFs would typically operate in this range and would depend on a particular type of development. 

<sup>29</sup> This would provide for consistent terminology alongside the Whakatipu Basin Schedules which are effectively a second-tier landscape, and thus would be consistent with RCL priority area landscapes.

<sup>30</sup> New development relates to the activity sought within the relevant application for consent application.

- 65 Some specific commentary relating to the fact that these ratings are not aligned with an assessment of effects, nor relate to value ratings may be required to avoid potential confusion with other 7-point scales used. Potentially, commentary outlining that these will not form information relating to specific zoning outcomes (as the LCUs have done), may also be needed.
- 66 In my view, the capacity terms and descriptions used in the PA's and described in the preamble of the PA's appears to operate in the bottom half of the table I outlined above. Whilst the terms 'some' and 'limited' cannot be directly compared to terms such as '*moderate*' or '*moderate-low*', they do hold some level of similarity. The key to the table is acknowledging that there is a level of flexibility to suit the various types of development within the varied landscape values in each PA, which will suit a more detailed level of scrutiny when individual developments/ activities are considered for consent. The table also highlights a level of language consistency with the with the PDP.
- 67 I do not intend to comment individually on each rating, but I do note that '*very low*' could mean no capacity for some types of development. This rating essentially acknowledges that any development is severely restricted, and dependant on type, scale and overall design of the activity/ development, when considered against the values, at a more granular scale reflecting the nuances of what is proposed.
- 68 Further, I note that not all conceivable types of activities, locations or developments have been considered and that 'other' potential types of development may pose a threat to landscape values. For example, within the Cardrona Valley PA, this includes a portion of the Ski Area Sub-Zone (SASZ). It is suggested that the landscape capacity ratings encompass the full range of activities secured through the SASZ appeals, including, in addition to passenger lift systems, the terminal buildings and stations associated with the passenger lift systems, as well as the transport infrastructure necessary to connect between the new terminal base and the road network. The suggested changes proposed by the Council are presently limited to just the passenger lift system.
- 69 In addition, these Schedules represent a point in time, and should acknowledge this omission.

## **Mapping**

- 70 I agree that the identification of landscape values that underpin a mapped ONF or ONL retain an inherent relationship and should be undertaken

together. *'Mapping of boundaries should reflect the purpose of the assessment and be in response to landscape character and values'*.<sup>31</sup>

- 71 I agree with Bridget Gilbert that modification within a landscape is not necessarily the precursor which determines whether a landscape meets the ONF or ONL threshold. It is how the landscape values, under the three dimensions (physical, perceptual and associations) work together in a particular landscape. I agree that *'farming areas (including pastoral areas) can qualify as a s6(b) (RMA) landscape and feature'*<sup>32</sup>. I also agree that it is a question of scale and context, and where the scale, nature and extent of the modification is such that it dominates the landscape, then a decision is made around whether the area of modification sufficiently devalues the landscape below the s6(b) threshold. This is where the landscape schedules need to be carefully crafted, ensuring that all values, along with modifications and land uses (and existing unimplemented contents and consideration around zoning) are captured.
- 72 I also agree that community participation is critical in understanding landscape values, as outlined earlier. This can highly influence the mapped extent of a feature or landscape, supported by a comprehensive schedule of values. Whilst I have not been directly involved with QLDC's process, I am aware of the role of the Environment Court in these proceedings and therefore respect the process taken to date.<sup>33</sup>

### **Specific Landscape Schedules**

- 73 The following is my review of the relevant PAs to my evidence.

#### ***Whakatipu Area: 21.22.1 PA ONF Peninsula Hill***

- 74 Overall, I am in broad agreement with the listed descriptions and values associated with this PA, however, I comment more comprehensively regarding the landscape capacity ratings below. The Darby related interests (submitter: Coneburn Preserve Holdings Limited and Henley Downs Farm Holdings Limited) within this PA includes the smoother and visually coherent landform on the southern side of Peninsula Hill and its broadly undeveloped hummocky terrain within the Jacks Point zone. This area retains two consented dwellings (HS<sub>36</sub>, which is developed and HS<sub>58</sub> which is undeveloped). The evidence of Chris Ferguson outlines these further.

---

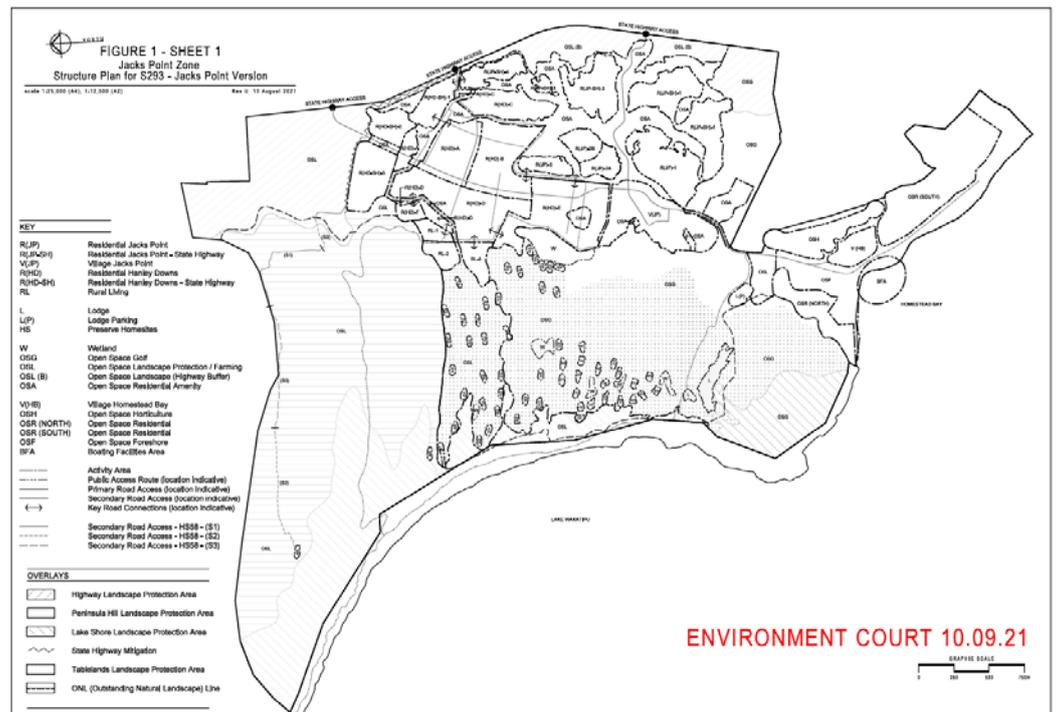
<sup>31</sup> Te Tangi a te Man, paragraph 5.19

<sup>32</sup> Bridget Gilbert evidence, paragraph 5.8.

<sup>33</sup> It may result, that following this process, some PA's may require some boundary adjustments.

*Description of values of ONF Peninsula Hill*

- 75 Within the general description of the PA, it is acknowledged that the southern part of the ONF overlaps with the Jacks Point Zone (Exception Zone) and the Jacks Point Urban Growth Boundary.
- 76 Under Important land use patterns, acknowledgement is made that ‘a dwelling is anticipated in a localised hollow at the western end of the uppermost gully with a second dwelling anticipated adjacent the south boundary of the ONF’.<sup>34</sup> This is reflective of the Structure Plan below.



77 I also support the wording in the Remoteness and wildness attributes and values: ‘The juxtaposition of the generally undeveloped ‘natural’ landform in close proximity to Queenstown contributes to an impression of wildness, and the experience afforded from locations such as the Jacks Point Trail and Whakatipu Waimāori (Lake Whakatipu) to the west and southwest, where views of Peninsula Hill are generally unencumbered by visible built development contributes an impression of remoteness’.

78 I agree with the overall ‘high’ rating for physical values; ‘high’ rating for associative values and ‘very high’ rating for perceptual values.

<sup>34</sup> Also outlined in Bridget Gilbert’s evidence, paragraph 9.14.

### *Landscape Capacity for Peninsula Hill*

- 79 I comment below on the relevant activities and provide a new rating (based on my suggested 7-point scale table) coupled with reasons (where relevant) for this.
- 80 *'Commercial recreational activities – very limited'*. Under my rating, this would equal 'Low', and I agree with this.
- 81 *'Visitor accommodation and tourism related activities – no landscape capacity for tourism related activities. Excepting in relation to the two homesites within the Jacks Point zone and consented dwellings within the PA at Hanleys Farm, no landscape capacity for visitor accommodation activities'*. I disagree with this. Under my rating, this would equal 'Very Low'. Any additional built form would need to be carefully located and designed to ensure that the underlying landscape values are not adversely affected, noting that for Darby area of interest, this is within the UGB and Jack's Point Zone. Visitor accommodation can assume many forms and guises<sup>35</sup>. By placing a low or very low capacity ensures that a definitive 'no' is ruled out, however, a 'no' maybe appropriate dependent on the location and design of the proposed built forms, and *'are of a scale and nature that does not detract from the values of the landscape or feature'*<sup>36</sup>. Based on this, I support a 'low' or 'very low' capacity rating.
- 82 *'Urban expansions – no landscape capacity'*. Under my rating, this would equal 'Very Low', and I agree with this.
- 83 *'Intensive agriculture – no landscape capacity'*. Under my rating, this would equal 'Very Low', and I agree with this.
- 84 *'Earthworks – very limited'*. Under my rating, this would equal 'Low', and I agree with this.

---

<sup>35</sup> Refer to Chapter 2 of the PDP (Definitions) and page 43 'Visitor Accommodation': *'Means the use of land or buildings to provide accommodation for paying guests where the length of stay for any guest is less than 90 nights; and (i) Includes camping grounds, motor parks, hotels, motels, backpackers' accommodation, bunkhouses, tourist houses, lodges, timeshares and managed apartments; and (ii) Includes services or facilities that are directly associated with, and ancillary to, the visitor accommodation, such as food preparation, dining and sanitary facilities, conference, bar, recreational facilities and others of a similar nature if such facilities are associated with the visitor accommodation activity. The primary role of these facilities is to service the overnight guests of the accommodation however they can be used by persons not staying overnight on the site. (iii) includes onsite staff accommodation. (iv). Excludes Residential Visitor Accommodation and Homestays'*.

<sup>36</sup> Bridget Gilbert evidence, paragraph 5.15.

- 85 *'Farm buildings – very limited'*. Under my rating, this would equal 'Low', and I agree with this.
- 86 *'Mineral extraction – no landscape capacity'*. Under my rating, this would equal 'Very Low', and I agree with this.
- 87 *'Transport infrastructure – very limited'*. Under my rating, this would equal 'Low', and I agree with this.
- 88 *'Utilities and regionally significant infrastructure – limited'*. Under my rating, this would equal 'Low', and I agree with this.
- 89 *'Renewable energy generation – no landscape capacity for large scale renewable energy developments. Very limited landscape capacity for discreetly located and small-scale renewable energy generation'*. Under my rating, this would equal 'Very Low', and I agree with this.
- 90 *'Forestry – no landscape capacity'*. Under my rating, this would equal 'Very Low', and I agree with this.
- 91 *'Rural living – very limited to no landscape capacity for rural living development which: is located to optimise the screening and/or filtering benefit of natural landscape elements; is designed to be small scale and have a 'low-key' rural character; integrates landscape restoration and enhancement (where appropriate); and enhances public access (where appropriate).'* Under my rating, this would equate to a 'low' rating, where there is an acknowledgement that part of the PA is within the UGB and Jack's Point Zone. Any additional rural living would need to be carefully located and designed to ensure that the underlying landscape values are not adversely affected, however. Based on this, I support a 'low' capacity rating.

**Whakatipu Area: 21.22.16 ONL Eastern Whakatipu Basin**

- 92 Overall, I am in broad agreement with the listed descriptions and values associated with this PA, however, I comment more comprehensively regarding the landscape capacity ratings. These points relate to submitter Glencoe Station Limited and Glencoe Lands Development Company Limited.
- 93 Darby related interests within this PA include land in the north-western end of the Crown Terrace, that is contained by the northwest extent of the Crown Range to the north, the slopes of Mt Beetham to the southeast, and the Crown Escarpment to the west. The landholdings include a collection of farm buildings within Glencoe station that sit within the flat land next to

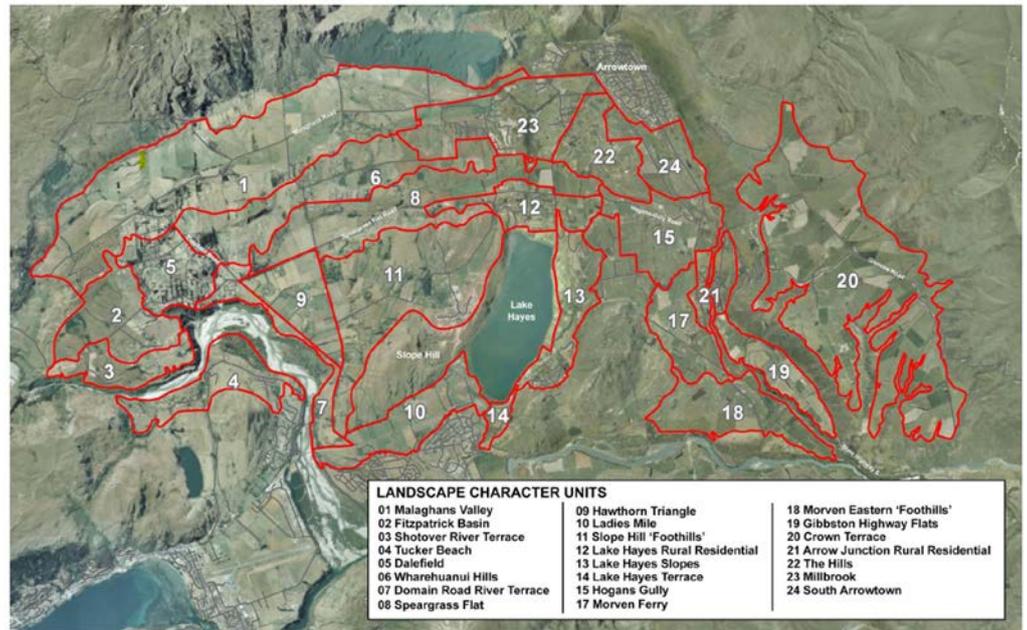
the upper reaches New Chum Gully. These include the historic homestead of Glencoe station, as well as workers accommodation and a wool/shearing shed. Further south, a farm shed is located on a separate land title. All buildings are on the relatively flat grazed land of the Crown Terrace that sit 200m above the settlement of Arrowtown. Tobins track – a shared use pathway provides walking and cycle connection up the steep face of the Crown Terrace Escarpment between Arrowtown and the Arrow River below, and the Crown Terrace.

- 94 The landscape area including the Glencoe homestead and associated buildings is contained within a discrete pocket of flat land that has been settled for over a hundred years, however knowledge of this part of the Crown Terrace is limited due to its limited visibility. Development rights held by Glencoe include two undeveloped residential building platforms, each located on their own title.

*Description of values for Eastern Whakatipu Basin*

- 95 I largely agree with the values as described in the landscape schedule for Eastern Whakatipu Basin, however consider that recognition should be given to the inclusion of the north-western extent of the Crown Terrace within the East Wakatipu and Crown Terrace ONL. As mentioned above, this area includes a homestead and a small cluster of farm buildings that create a Landscape Character that is more consistent with that of the Crown Terrace landscape Character Unit which is part of Schedule 24.8 of the Plan (LCU20).

24.8 Schedule 24.8 Landscape Character Units



Queenstown Lakes District Council - Proposed District Plan Decisions Version (June 2022)

- 96 The landforms and landtypes therefore should recognise the elevated glaciated terrace<sup>37</sup> that extends past LCU20 and includes Glencoe Station and the domesticated flat area of land associated with the homestead, farm buildings and consented building platforms as being part of this landform pattern. I note this is mentioned as part of the *'Aesthetic attributes and values'*<sup>38</sup>, but is not recognised in the *'Important landforms and landtypes'* section.
- 97 Under *'Important ecological features and vegetation types'* and within the *'Other distinctive vegetation types'*, the description *"grazed pasture associated with Glencoe Station land"*<sup>39</sup> provides some indication of the vegetation type associated with the station, however again the Crown Terrace LCU has a better description of *"shade trees, pockets of bush and patches of scrub in gullies. Exotic Amenity plantings around dwellings"*<sup>40</sup> which describes distinctly more domesticated vegetation pattern around Glencoe station, that includes a collection of established exotic trees

<sup>37</sup> PDP Decisions version; 24.8 Landscape Character Unit 20 page 24-47

<sup>38</sup> See S42A Appendix 1 21.122.16-page 7 para 70 a. "The highly attractive and memorable composition created by the continuous 'wall' of rugged and dramatic mountains backdropping the distinctive river terrace escarpment, which together frame the eastern site of the Whakatipu Basin."

<sup>39</sup> S42A Appendix 1 Recommended amendments to the PA Schedules, and preambles page 2

<sup>40</sup> PDP Decisions version; 24.8 Landscape Character Unit 20 page 24-47

(including Pines, Cyprus, Poplar, Willow) and orchard trees that have been in place for a long time and mark this area as an area of domesticated landscape (associated with a homestead) that differs from the wild tussock clad mountain slopes.

- 98 I agree with the overall rating of 'high' for physical values, 'high' for associative values and 'high' perceptual values. I note that the one of the factors that contributed to a 'high' associative value relates to the *"significant recreational attributes of the network of walking and biking tracks in the area"*.

#### *Landscape Capacity for Eastern Whakatipu Basin*

- 99 Commercial Recreational activities have been listed as 'very limited'. Under my rating, this would equal 'Low', and I agree with this.<sup>41</sup> I consider that well designed commercial recreational activities could be accommodated into the landscape at a sympathetic scale in a manner that protects the identified landscape values – especially noting that the current recreational use of the PA contribute to its high associative values rating.
- 100 Visitor Accommodation Activities – very limited. Under my rating again, this would equate with 'Low'. I agree that, at a landscape scale, the PA has low capacity to absorb visitor accommodation activities, however, there is potentially some capacity when clustered with existing buildings<sup>42</sup>. I note that the Glencoe homestead area has the capacity to absorb this type of development if designed to be complementary to the scale and in a way that respects the heritage vernacular of the existing buildings. I also note that there are two undeveloped residential platforms within the Darby landholdings that could contain a dwelling each. From a landscape perspective the built form associated with visitor accommodation can be very similar to that of a residential dwelling and it may be that this activity could occur on these sites in place of a residential dwelling and have a similar landscape effect.
- 101 I disagree that there is 'no' capacity for tourism related activities<sup>43</sup>. I consider that this does not allow for an effects-based assessment, and it would be possible to carry out tourism-based activities within Glencoe

---

<sup>41</sup> It is my understanding that 'Commercial Recreation Activities' are permitted within the Rural Zone, where they are on land, outdoors and involving no more than 15 persons. This rule provides for the activity / use of the land only and not buildings. Buildings associated with the Commercial Recreation Activity are a discretionary activity status.

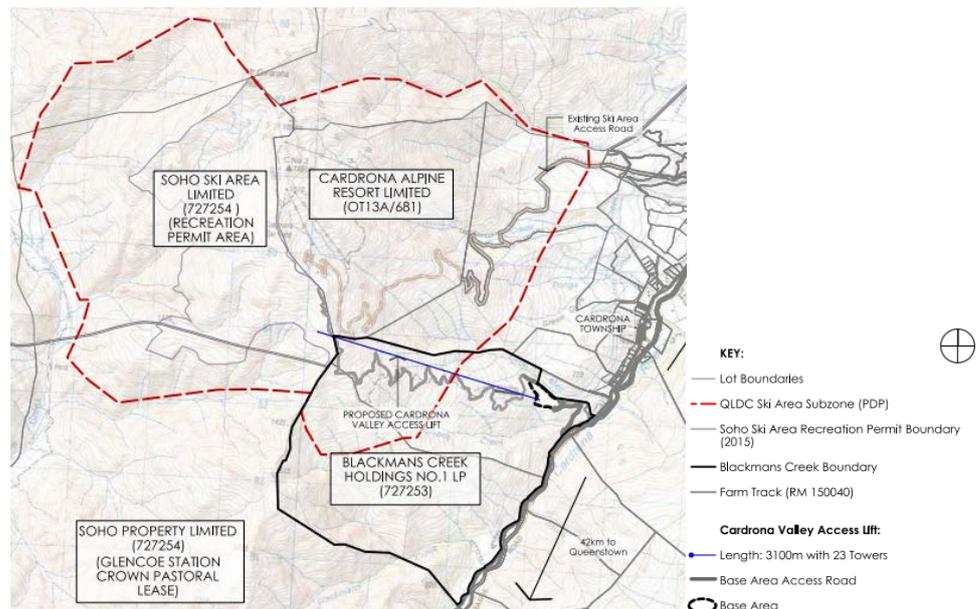
<sup>42</sup> Which may also include extensions, alterations/ upgrades or replacement of existing buildings.

<sup>43</sup> Whilst acknowledging that I do not agree with the definition as outlined in the PDP.

Station or in part on Glencoe Station and Glencoe Land Development Company Land without any adverse effect on landscape values. These could include commercial use of existing bike or walking trails or repurposing the shearing /woolshed as a venue for tourism related activities such as learning a skill (weaving, painting, landscape restoration, meditation/ mindfulness or cooking), which could be done at a boutique scale without impacting on identified landscape values. I consider that the capacity rating should be changed to 'low' to reflect this, recognising that there is some landscape capacity for tourism related activities in visually recessive locations or clustered with (or within) existing buildings, that is: of a low-key rural character; integrate landscape restoration and enhancement; enhance public access, whilst still protecting the area's identified values.

**Whakatipu Area: 21.22.18 PA ONL Cardrona Valley**

102 These points relate to submitter Soho Ski Area Limited and Blackmans Creek No. 1 LP. Land involved relates to both land within the Cardrona Valley Road (extending from Cardrona Valley Road to the summit of the ridge south of Cardrona Ski field (including land in the Ski Area Sub-Zone) and parts of the Crown Range west of Cardrona Valley on the western slopes of Mt Cardrona. This contains land within the Glencoe pastoral lease, where the Crown has granted a recreation permit for the operation of a ski area. The diagram below assists to illustrate this relationship.



**Description of values for Cardrona Valley**

103 Having read the values I find that I largely agree with the listed descriptions and values associated with this PA however, consider that the attributes

and values could be expanded on (as has been done in other areas) to acknowledge the level of recreational activity that contributes to the associative values of the PA generally and the Soho area in particular. Notably within the *'Important land use patterns and features'* section, acknowledgement, in my view needs to be made of the likely activities that have been secured within the SASZ, including, in addition to passenger lift systems, terminal buildings and stations associated with the passenger lift systems, as well as transport infrastructure necessary to connect between the terminal base and the road network. The wording currently suggested in the PA is presently limited to just the passenger lift system.

- 104 I agree with the overall rating of 'high' for physical values, 'very high' for associative values and 'high' perceptual values. I note that the one of the factors that contributed to a 'high' associative value relates to the *"popularity of the area as a tourism and recreational destination"*.

#### *Landscape Capacity for Cardrona Valley*

- 105 Part of this PA retains a SASZ<sup>44</sup>, which forms part of an Exception Zone framework. I understand that this means that activities within this sub-zone that are allowed by the rules of the plan can occur without the requirement to protect outstanding natural landscape values that would otherwise be protected within the LPA<sup>45</sup>. As outlined in 3.2.5.4<sup>46</sup>, in each Exception Zone located within or part within Outstanding Natural Features and Outstanding Natural Landscapes, any application for subdivision, use and development is provided for:

- a. *To the extent anticipated by that Exception Zone; and*
- b. *On the basis that any additional subdivision, use and development not provided for by that Exception Zone protects the landscape values of the relevant Outstanding Natural Feature or Outstanding Natural Landscape.*

- 106 Landscape effects would also be considered if a proposal (or part of a proposal) is in an Exception Zone that creates effects on landscape values on land with Rural zoning outside that exception zone<sup>47</sup>.

- 107 In terms of the activities listed, similar to other areas, I consider that there could be other activities that can be accommodated in manner that protects

---

<sup>44</sup> Ski-Area sub zone.

<sup>45</sup> PDP Strategic Direction 3.1B.6 page 3-3

<sup>46</sup> PDP Strategic Direction 3, 3.2.5.4 page 3-6

<sup>47</sup> PDP Strategic Direction 3, 3.2.5.4 page 3-14

landscape identified landscape values that have not been listed, such as helicopter or aerial travel.

108 Through the PDP appeals, Soho Ski Area Ltd had provisions within the Rural Zone for passenger lift systems, terminal buildings and stations providing access to SASZs, included in Chapter 21 as a restricted discretionary activity rule and associated policy included below:

**21.2.6.4** *Provide for non-road forms of access to the Ski Area Sub-Zones, by way of passenger lift systems, terminal buildings and stations for passenger lift systems, and ancillary structures and facilities:*

(a) *In locations where there is landscape capacity for that activity (which could include locations where buildings or structures will not be reasonably difficult to see from beyond the boundary of the site in question, in which case Policy 6.3.3.1(b) does not apply); and*

(b) *In a manner that protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes by:*

*i. Avoiding adverse effects on landscape values; and*

*ii. If avoidance is not practicable due to either the functional or operational needs of the activity or the proposed route or location, remedying or mitigating any adverse effects.*

109 This wording suggests that the Plan anticipates this type of activity to enable the functioning of the SASZ, and considers that with careful management, such activity could be accommodated, and the landscape schedules should recognise the possibility for passenger lift systems, terminal buildings and stations for those passenger lift systems being constructed within the rural zone in limited circumstances. This is especially so where they provide access to SASZs, including within the description of the landscape values and landscape capacity as framed by the above rule.

110 ‘*Visitor accommodation and tourism related activities,*’ retains ‘*some*’ landscape capacity for visitor accommodation activities that are: ‘*co-located with existing facilities; designed to be of sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; enhance public access*’. The description continues to state:

*'Very limited to no landscape capacity<sup>48</sup> for tourism related activities outside of the Settlement Zone and Mount Cadrona Station Special Zone, except where co-located with the Settlement Zone on the valley floor and is: of a modest or sympathetic scale, has low-key, visually recessive 'rural' character, integrates appreciable landscape restoration and enhancement, enhances public access, integrates a strong defensible edge to avoid the potential risk of development sprawl and complements the existing character of the Cardrona Settlement'.* Under my capacity ratings, some would equate to 'moderate', and I generally agree with this, however, note that the description should be expanded to enable the potential for visitor accommodation and tourism activities to be located within the Cardrona Alpine Resort (including the SASZ) if appropriately co-located around other key facilities within the zone in a manner that contains their visual and landscape effects.

- 111 *'Transport infrastructure'* is rated as *'limited'* and under my seven-point scale this would be consistent in capacity with moderate-low in the preamble. It also rates 'very limited' capacity for *'additional roads, upgrades or expansions to existing roads, car parking and passing bays on the enclosing mountain slopes of the valley'*. In the following text, for clarity it would be better to have wording that directly relates to what the rules and related assessment matters enable, allowing for a carpark and terminal building within the rural zone near the floor of the Cardrona Valley.
- 112 *'Passenger lift system'* (previously gondolas) is rated as *'limited'*. As above this would equate with moderate-low in the preamble. I note that Soho Ski Area Ltd would prefer the use of Passenger Lift systems in place of 'Gondola'. This enables the potential to consider other modes of transport, so long as these have no greater effect on landscape values.

### **Upper Clutha Area: 21.22.21 PA ONL West Wānaka**

- 113 These points relate to submitter Glendhu Bay Trustees Limited. Having read the JWS<sup>49</sup> on the PA relating to West Wanaka Schedule of landscape values, I am largely in agreement, however I note that this PA contains a varying range of areas (from steep mountain flanks, to roche moutonnée to glaciated terraces and fans) with each area potentially holding very different capacity capabilities. This is somewhat expressed by the lake area and evidenced by the consented development within the Glendhu Station land

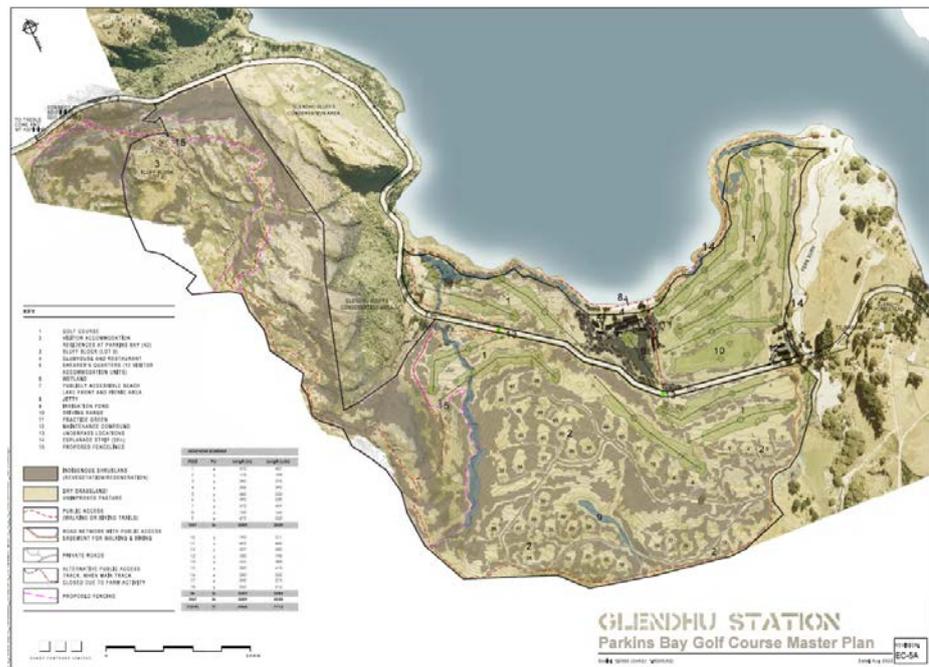
---

<sup>48</sup> And acknowledged within the evidence of Bridget Gilbert, paragraph 9.15 (which was previously 'no capacity').

<sup>49</sup> Joint Witness Statement – Topic 23 Rezoning Appeals (Group 2): PA ONL West Wanaka Schedule of Landscape Values, 24 June 2021, between Yvonne Pflüger, Bridget Gilbert and Stephen Brown.

and adjoining Glendhu Bay. Therefore, having one capacity ranking for the PA is necessarily high level and blunt.

- 114 The land of interest to Darby entities (Glendhu Bay Trustees Ltd) includes the land that extends along the shores of Lake Wanaka from Glendhu Bluff, east around Parkins Bay to the Fern Burn and south of this shoreline, west of Motutapu Road. This includes part of the western Wanaka shoreline (Parkins Bay) and the low-lying lake and river terraces and outwash material from the Fern Burn; including the moraine outwash area along the western side of Fern Burn valley<sup>50</sup>.
- 115 Glendhu Bay Trustees Ltd land includes resource consent<sup>51</sup> for an 18 hole-championship golf course, a series of lakeside buildings including a club house, restaurant and café, a jetty and visitor accommodation units and 42 residences. This was approved for consent by the Environment Court in 2012 and has been varied subsequently through a number of Council decisions. I noticed on the Site visit that this development has been given effect to, with house sites formed on the land above the Wanaka Mt Aspiring Road, and the Golf Course area being contoured and shaped. The revegetation measures were also clear – especially along the northern stream course that runs into Parkins Bay, and around a number of the homesites. The approved Master Plan is illustrated below:



<sup>50</sup> As described in S42A Appendix 1 Recommended amendments to the PA Schedules 21.22.21 PA ONL West Wanaka: Important Landform Types page 1.

<sup>51</sup> (RM070044)

- 116 I note that the capacity ratings need to allow for a wider range of activities than have been identified to date. As mentioned earlier, the values identified are responding to a moment in time but are also representative of the land use pressures that are currently at play. These may change and new activities that are not currently considered may play a part in the future land use of these areas, for example aerial transport. Effects associated with these may not be greater than the activities listed, however if they are not part of the schedule, they may by default, be seen as inappropriate.

#### *Description of values for West Wānaka*

- 117 Under the 'Naturalness attributes and values' section, it notes that: "*Parkins Bay...conveys a sense of transition, away from the rural environs of Glendhu Bay and the lake margins into a more natural landscape*". [my emphasis].
- 118 The section then goes on to describe the development within Glendhu and Parkins Bay, including the consented development on Glendhu Bay Trustees land. The landscape character of Parkins Bay will change as a result of this consented development. I consider that the extent of development consented will not form a *transition* to a more natural landscape in Parkins Bay, although the unnamed northern stream, and the Fern Bern stream will both remain natural elements and features. The establishment of the 18-hole golf course, visitor accommodation, jetty and club houses will characterise a landscape that is developed, however with a strong focus on ensuring development is subservient to the wider landscape values and by incorporating significant restoration efforts into the development, will enhance these natural vegetation patterns. These restoration efforts, and the wider plantings (incorporating 60 hectares of land) will change the appearance and values of this area of the PA– again showing how the values as described in the Schedules are representative of a moment in time, with the landscape patterns continually evolving.
- 119 I agree with the overall rating of 'high' for physical values, 'high' for associative values and 'high' perceptual values. I note that one of the factors that contributed to a 'high' perceptual value relates to "*A moderate to high impression of naturalness arising from the dominance of the natural landscape and the generally relatively modest or visually recessive nature of built development*".

#### *Landscape Capacity for West Wānaka*

- 120 The activities listed are not exhaustive, and it could be that there are other activities that have limited, low or no effects on landscape values that are not listed. I consider that without commentary regarding this, this could

create disadvantages in terms of the ability for the landscape to absorb these activities in the future.

- 121 In the recommended amendments to the PA schedules, '*Visitor accommodation and tourism related activities (including campgrounds)*' – rates as having very limited landscape capacity. Under my rating, this would equal 'Low'. Having read the JWS, the language within this discusses *limited* potential (for all activities), and has the following wording for this activity:

*'visitor accommodation and tourism related activities that are co-located with existing consented facilities, designed to be visually recessive, of a modest scale, have a low key 'rural' character and be consistent with the area's ONL values'*.

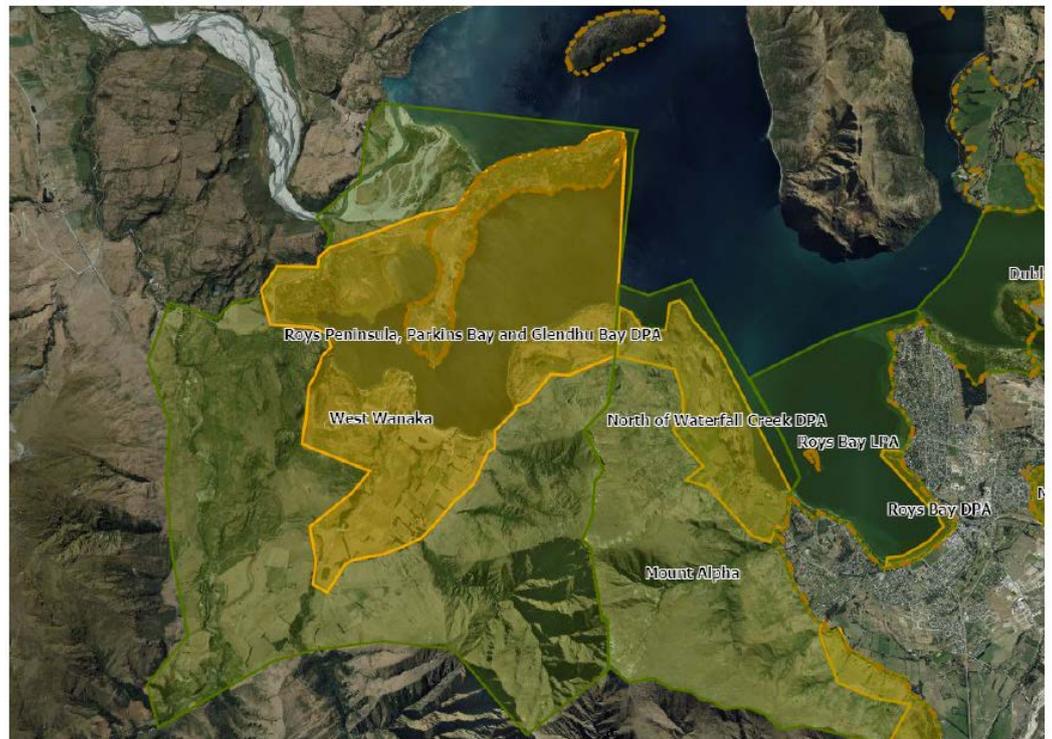
- 122 It appears from reading this, that a greater level of '*visitor accommodation and tourism*' related facilities was considered appropriate by the landscape architects involved in the JWS than the PA schedule states. I agree with the intent contained in the wording of the JWS and consider '*modest*' to equate to a moderate-low rating on the seven-point scale – i.e., '*a moderate to low amount of development could be accommodated in limited situations, whilst still protecting all identified landscape values*'.

- 123 The landscape is close to its development capacity, however further sensitively located and designed development could be absorbed. I recommend a *moderate to low* capacity for '*visitor accommodation and tourism related activities (including campgrounds)*' that are designed to be visually recessive, of a modest scale and have a low key '*rural*' character that protects identified landscape values (in line with the wording of the JWS).

- 124 In the recommended amendments to the PA schedules '*Rural living*' is rated '*very limited*' landscape capacity on '*lower lying terrain and sited so that it is contained by landforms and vegetation – with the location, scale and design of any proposal ensuring that it is barely discernible from external viewpoints. The exception to this is Roys Peak, where rural living development should be extremely visually recessive. Developments should be of a modest scale; have a low key 'rural' character; integrate landscape restoration and enhancement and enhance public access*'.

- 125 The JWS stated the following: '*Rural living, predominantly located on lower lying terrain and sited so that it is contained by landforms and vegetation, with the location, scale and design of any proposal ensuring that it is reasonably difficult to see from public roads and visually recessive from other viewpoints beyond the site*'.

- 126 I note that Bridget Gilbert and Steven Brown wanted the following changes to the text to address cumulative adverse effects: *‘Rural Living, predominantly located on lower lying terrain and sited so that it is contained by landforms and vegetation – with the location, scale and design of any proposal ensuring that it is barely discernible from external viewpoints. The exception to this is views from Roys Peak, where rural living development should be extremely visually recessive’.*
- 127 In Chapter 3 Strategic Direction, there is a definition of Rural Living<sup>52</sup>: *‘Rural Living’ means residential-type development in a Rural Character Landscape or 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’.*
- 128 I agree that there is greater capacity within the lower lying areas and consider this to correlate largely with the 400m contour line within this PA. This appears consistent with the mapping within the PA illustrating where development pressure is most apparent (taken from JWS):



**Figure 1:** Extract from QLDC ONF/L Priority Area mapping (Green areas correspond to Priority Area ONF/L; orange areas correspond to Development Pressure Areas)

<sup>52</sup> PMEP Chapter 3 Strategic direction 3-2

- 129 I note that the landscape character in both Parkins Bay and Glendhu Bay, close to the lake, appears more domesticated and modified, with a pattern of land use not reflective of the surrounding mountain and Roche moutonnée landscape that is contained within the same PA. It also differs from the ONF of Roys Peninsula. The character is more reflective of a visual amenity landscape; however, the scale of this area was considered too small to identify it as such, and the Environment Court therefore classified this area as within / part of, the surrounding ONL<sup>53</sup>. Based on this, I consider that rural living opportunities may be similar to visitor accommodation within parts of this PA (such as within Fern Burn Valley or Parkins Bay). Any additional rural living would need to be carefully scaled, located and designed to ensure that the identified landscape values are not adversely affected.
- 130 Based on this, I support a 'low' capacity rating (or 'very limited' to use the existing schedules terminology). Rural living could be co-located within existing consented development if this can be achieved in a manner that is sympathetically designed and visually recessive, or of a modest scale and protecting of identified landscape values. Visitor accommodation development could also be in sensitively placed low lying landscape areas if designed in a manner that is visually recessive, is of a low-key rural vernacular and if the visual effects are largely internalised with landscape character enhanced.
- 131 There may also be the opportunity to enhance vegetation patterns through restoration at an appropriate scale that contributes to the overall naturalness of the landscape area. With regards to the view from Roys Peak, I am not sure there is justification for an increased level of assessment (in terms of the wording '*extremely visually recessive*'). I consider that the wording would be clearer if consistent with the '*reasonably difficult to see*' wording used in Chapter 6<sup>54</sup>, for this view. With regard to Rural Living, I am supportive of having '*reasonably difficult to see*' from public roads in parts of the landscape where the rural character/naturalness attributes of the landscape dominates (and from Roys Peak) and visually recessive from other areas and other public viewpoints beyond.

## Conclusions

- 132 The PA Landscape Schedules are to identify values, but values and landscapes evolve and change over time. The schedules therefore provide

---

<sup>53</sup> Upper Clutha Tracks Trust v Queenstown Lakes District Council (first Parkins Bay decision)

<sup>54</sup> PDP Chapter 6 6.3.3.1 page 6-4

protection of identified values at this point in time, but they are not finite and may be supplemented by a further site-specific assessment / project assessment in the future.

133 The purpose of the PA Landscape Schedules are for district planning, and therefore they are sufficiently '*high level*'. To undertake a more granular type of landscape scheduling would not be an appropriate planning response for the DP which is to evolve for future community needs (alongside potentially evolving landscapes and their associated values).

134 In terms of Landscape Capacity, I consider this helpful and appropriate in these tables. However, I do express concern over part of the approach utilised, and as a consequence, present a new rating table. I consider this new approach provides a level of consistency with language already used within the LCUs of the District Plan (and TTatM) and acknowledges that capacity can come in all shapes and form, and that a definitive 'no' appears contrary to the overall strategic direction.

Dated this 11th day of September 2023

**James Bentley**

# SUBMISSION ON LANDSCAPE SCHEDULES TO QLDC PDP

GRAPHIC SUPPLEMENT TO ACCOMPANY THE LANDSCAPE EVIDENCE OF JAMES BENTLEY

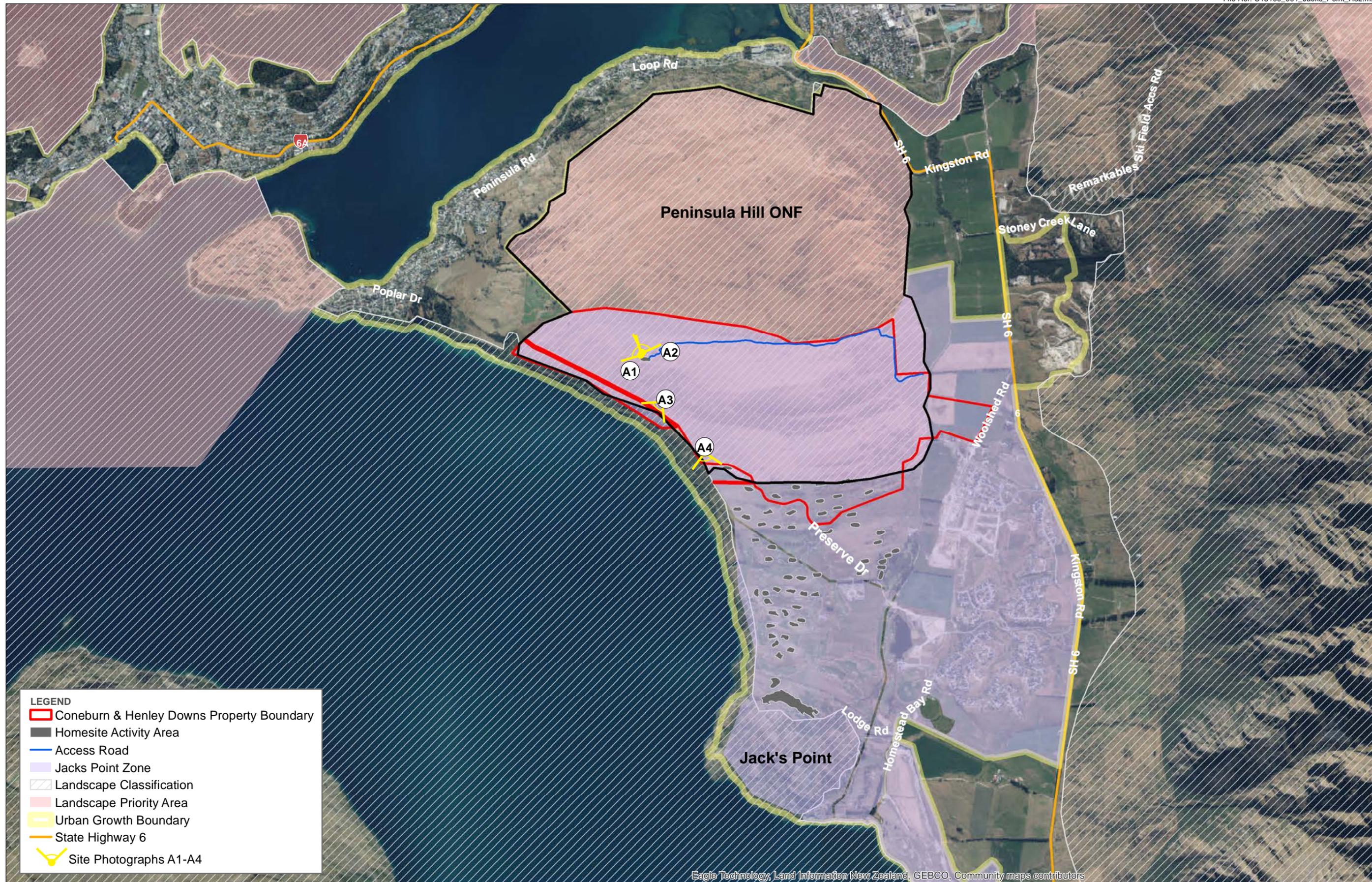
11 SEPTEMBER 2023





# CONTENTS

<b>FIGURE 1: Jack's Point</b>	1
Site Photographs A1 - A2	2
Site Photographs A3 - A4	3
<b>FIGURE 2: Crown Range</b>	4
Site Photographs B1 - B2	5
Site Photographs B3 - B4	6
<b>FIGURE 3: Cardrona</b>	7
Site Photographs C1 - C2	8
Site Photographs C3	9
<b>FIGURE 4: Glendhu</b>	10
Site Photographs D1 - D2	11
Site Photographs D3 - D4	12





Site Photograph A1: Photograph looking in a northwesterly direction towards Queenstown City Centre.



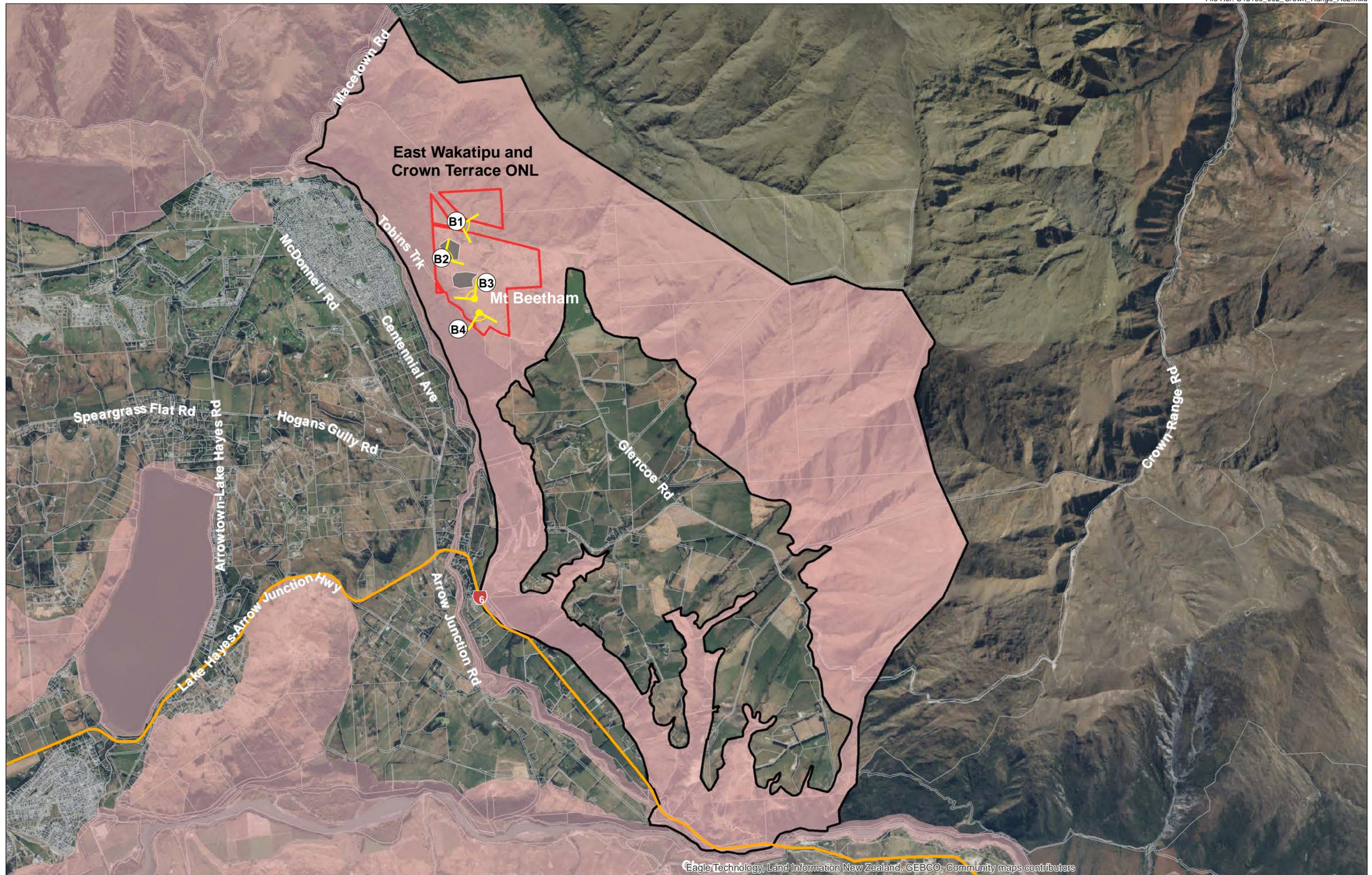
Site Photograph A2: Photograph looking in a northeasterly direction towards Peninsula Hill.



Site Photograph A3: Photograph looking in a southwesterly direction towards Lake Wakatipu.



Site Photograph A4: Photograph looking in a southeasterly direction across Jack's Point Resort.



Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

**LEGEND**

-  Glencoe Station & Glencoe Land Development Property Boundary
-  Landscape Priority Area
-  Homesite Activity Area
-  State Highway 6
-  Site Photographs B1-B4

**SUBMISSION ON LANDSCAPE SCHEDULES TO QLDC PDP**

**Crown Range**

Date: 11 September 2023 | Revision: 0

Plan prepared for Darby Partners Limited by Boffa Miskell Limited

Project Manager: Chris.Ferguson@boffamiskell.co.nz | Drawn: SCh | Checked: JBe



Site Photograph B1: Photograph looking in a southeasterly direction across towards the existing homestead in Glencoe.



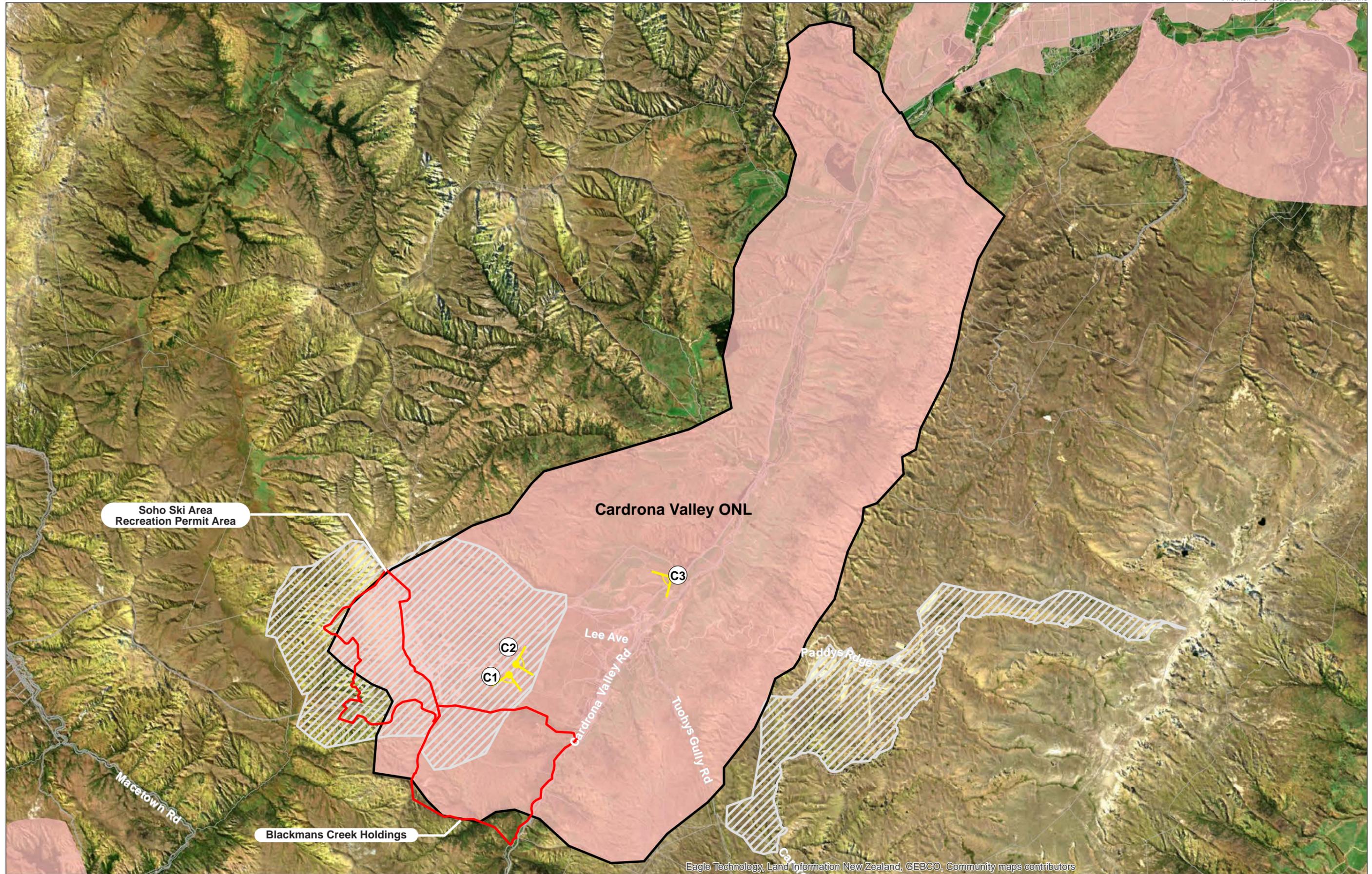
Site Photograph B2: Photograph looking in a northeasterly direction towards Glencoe and Mount Beetham to the right.



Site Photograph B3: Photograph looking in a northwesterly direction towards Crown Terrace and Arrowtown to the left.



Site Photograph B4: Photograph looking in a southeasterly direction.



Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



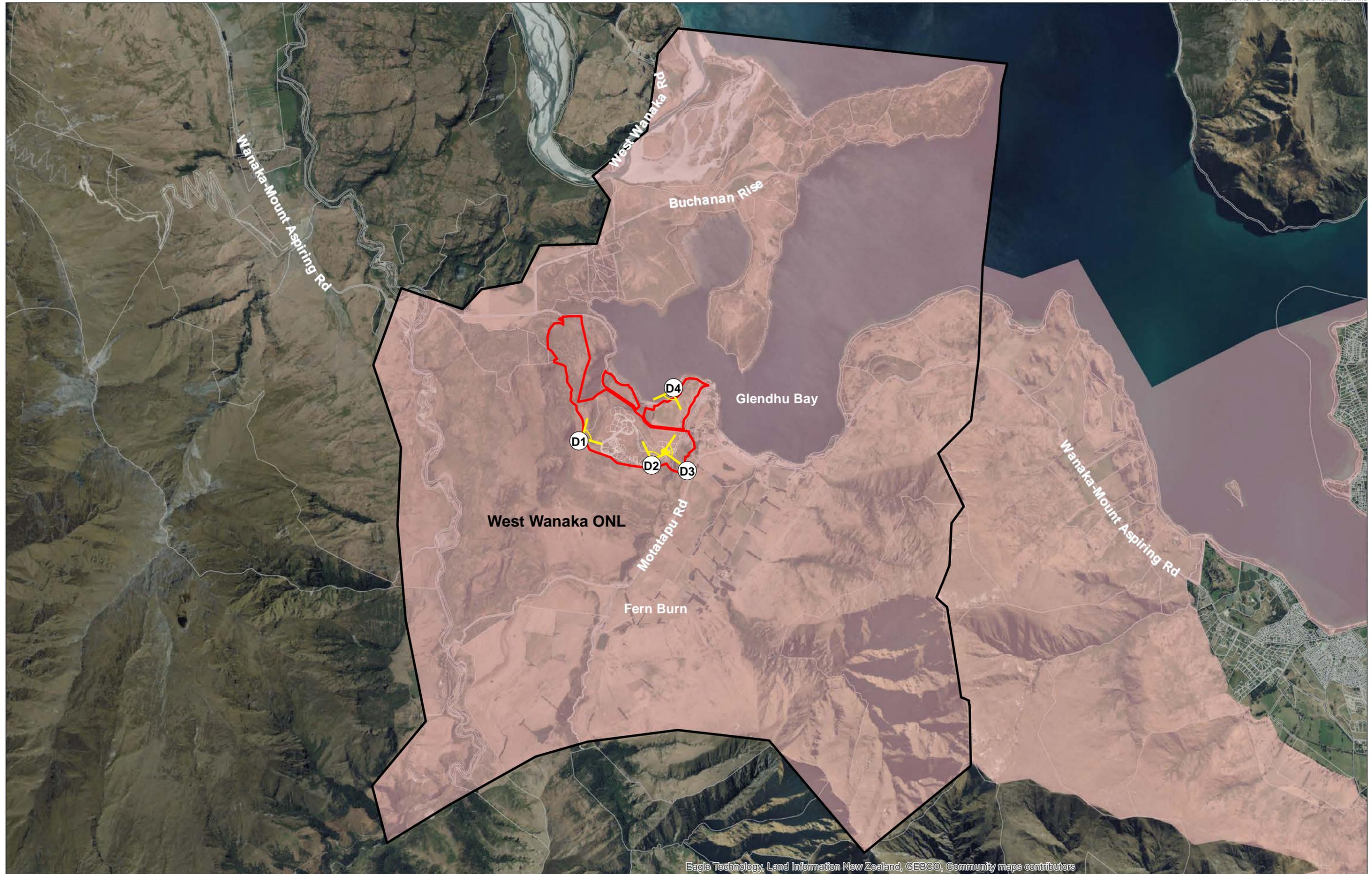
Site Photograph C1: Photograph taken from Cardrona Skifield Road, looking in a southwesterly direction.



Site Photograph C2: Photograph taken from Cardrona Skifield Road, looking in a northeasterly direction across Cardrona Valley.



**Site Photograph C3:** Photograph taken from Cardrona Valley Road, looking in a southeasterly direction towards Cardrona Alpine Resort.



Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



LEGEND

-  Glendhu Bay Trustees Limited Property Boundary
-  Landscape Priority Area
-  Site Photographs D1-D4

SUBMISSION ON LANDSCAPE SCHEDULES TO QLDC PDP

Glendhu

Date: 11 September 2023 | Revision: 0

Plan prepared for Darby Partners Limited by Boffa Miskell Limited

Project Manager: Chris.Ferguson@boffamiskell.co.nz | Drawn: SCH | Checked: JBe



Site Photograph D1: Photograph looking in a northeasterly direction towards Parkins Bay and Glendhu Bay.



Site Photograph D2: Photograph looking in a northeasterly direction.



Site Photograph D3: Photograph looking in a northeasterly direction towards Glendhu Bay.



Site Photograph D4: Photograph looking in a southwesterly direction.