

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the

Resource Management Act 1991

In the matter

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

**EVIDENCE OF JEREMY EVERETT HEAD ON BEHALF OF QUEENSTOWN LAKES
DISTRICT COUNCIL**

11 August 2023

**SIMPSON
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1. INTRODUCTION

1.1 My full name is Jeremy Everett Head. I am a Landscape Architect and Director of Jeremy Head Landscape Architect 2022 Ltd, Christchurch. I have been in this position since 5 September 2022.

Qualifications and Experience

1.2 I hold the qualifications of Bachelor of Landscape Architecture (Honours), obtained from Lincoln University 1993. I hold a Diploma in Computer Graphic Design; Natcoll Design Technology 1999. I have been a registered member of the Tuia Pito Ora New Zealand Institute of Landscape Architects ('NZILA') since 2004.¹

1.3 I have practised as a Landscape Architect for almost thirty years in New Zealand plus a short period of time in England (1999 – 2000). From 1993 – 1995 I worked for LA4 Landscape Architects (Auckland), then Lucas Associates (Christchurch) and Earthwork Landscape Architects (North Canterbury) between 1995 – 2006. From 2006 - 2018 I operated my own practice. From 2018 – 2022 I worked as a senior landscape architect at WSP (Christchurch) and by the time I left WSP in September 2022 I was a principal landscape architect at WSP, with the role of South Island Landscape Architecture Urban Design Team Leader.

1.4 During the course of my career, I have been involved in a wide range of work in expert landscape evaluation, assessment and advice and other landscape-related work throughout New Zealand, including:

- (a) landscape assessment of infrastructure, rural, coastal, and urban development, including several NoRs;
- (b) assisting with the preparation of three district-wide landscape studies one of which was 'Land Types / Ecosystems of the

¹ In 1997 I was made an 'Associate' member of the NZILA. The 'Registered' status replaced the associate membership status which was phased out in the early 2000s.

Queenstown Lakes District' (Lucas Associates, 1995). The other two were for Hurunui District (Lucas Associates, 1995) and Rodney District (LA4 Landscape Architects, 1993 – 1994);

- (c) assisting with NZ land type study through preparation of over 100 land type modelling diagrams across NZ (Lucas Associates 2022 - 2023);
- (d) preparation of a district wide landscape study for Wairoa District (WSP 2021 - 2022);
- (e) preparation of a landscape assessment for a proposed Shared Use Path along the northern flanks of the Remarkables, Queenstown;
- (f) regular peer review and landscape assessment work for district and regional councils, and the Department of Conservation;
- (g) teaching on an ad-hoc basis for the Lincoln University landscape programme (1995 – 2018); and
- (h) mentoring roles to support graduate landscape architects progress to registered status.

1.5 In 2017, I contributed to a workshop with four other senior Christchurch-based landscape architects as part of a national 'roadshow' with regards to developing an agreed landscape assessment methodology. This was facilitated by the late Environment Court Judge Gordon Whiting and is now borne out in *Te Tangi a te Manu* (Aotearoa New Zealand Landscape Assessment Guidelines) (**TTatM**), which was unanimously adopted by Tuia Pita Ora in May 2020.

Site Visits

- 1.6** I have conducted site visits specifically in relation to the Priority Area (**PA**) Landscape Schedules ‘evidence in chief preparation’ work, totalling four days of field work. This included driving the public road network and walking public tracks accompanied by Ms Bridget Gilbert.
- 1.7** My involvement in a range of other work in the district (as outlined above) has also involved numerous site visits, which have informed my overall knowledge of the PA landscapes. My familiarity with the district also includes having spent a week staying in the district while on family holidays every Autumn since 2008.
- 1.8** For completeness, I have not visited private properties specifically in relation to the PA Landscape Schedules (**PA Schedules**). This is considered appropriate given that the PA Schedules relate to a geographically defined ‘priority area’ rather than a ‘site’ and the extent of the PA mapping has been confirmed by the Environment Court.

Code of Conduct

- 1.9** Although this is a Council Hearing, I confirm that I have prepared this evidence in accordance with the Code of Conduct for Expert Witnesses, contained in Part 7 of the Environment Court Practice Note 2023. The issues addressed in this statement of evidence are within my area of expertise, except where I state that I am relying on the evidence or advice of another person. The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

Structuring of landscape evidence and collaboration with Ms Bridget Gilbert

- 1.10** Ms Helen Mellsoop and Ms Bridget Gilbert co-authored the twenty-nine notified PA Schedules (and Methodology Report), with Mr Brad Coombs

undertaking a peer review role. Since the PA Schedules were notified, Ms Mellsop has semi-retired, and she no longer has capacity to provide Council with landscape expert advice in relation to the PA Schedules Variation (**Variation**).

1.11 I was engaged by Queenstown Lakes District Council (**QLDC** or **Council**) to address the landscape related submissions for the fourteen PAs that Ms Mellsop authored. Ms Gilbert's evidence addresses the remaining fifteen PAs as well as the more general landscape related submissions, including submissions in relation to the methodology that underpins the preparation of the PA Schedules.

1.12 Several of the general landscape related submissions covered in Section 5 to Section 9 (inclusive) of Ms Gilbert's evidence also respond to submissions from 'my' 14 PAs, where the submitted wording and/or relief sought was very similar or identical to that in the submissions on Ms Gilbert's 15 PAs. This is discussed in more detail at [1.17].

1.13 Care has been taken throughout the review of submissions and drafting of evidence to ensure that Ms Gilbert and I are taking a consistent approach. This has involved:

- (a) a thorough briefing from Ms Gilbert;
- (b) extensive time spent in the field together, to discuss landscape matters 'on the ground';
- (c) regular meetings to share observations and discuss our responses to submission points;
- (d) ongoing review of each other's work;
- (e) comparing and contrasting to ensuring that the wording/terminology is consistent;

- (f) a moderation process during evidence preparation which included careful scrutiny of the Response to Submissions Version of the PA Schedules, Landscape Capacity Summary Table (described in more detail shortly) and detailed review of a selection of the PA Specific Submissions Summary, Landscape Comments tables (also described in more detail shortly) to ensure a reasonable level of consistency of professional judgement; and
- (g) the compilation of a Capacity Summary Table that allows for a clear comparison of the capacity ratings for each land use type across the twenty-nine PAs – refer **Appendix 1** to Ms Gilbert’s evidence.

Scope of Evidence

1.14 My evidence is structured to review landscape related submissions for a total of 14 PA Schedules (by submission point) and make recommendations with respect to amendments to the notified PA Schedules.

1.15 The PA Schedules that my evidence addresses are as follows:

21.22.4 Morven Hill PA ONF

21.22.7 Feehly Hill PA ONF

21.22.9 Kawarau River PA ONF

21.22.10 Mount Barker PA ONF

21.22.11 Mount Iron PA ONF

21.22.17 Victoria Flats PA ONL

21.22.18 Cardrona Valley PA ONL

21.22.19 Mount Alpha PA ONL

21.22.20 Roys Bay PA ONL

21.22.22 Dublin Bay PA ONL

21.22.24 Lake McKay Station and Environs PA ONL

21.23.1 Cardrona River Mount Barker Road PA RCL

21.23.2 Halliday Road Corbridge PA RCL

21.23.5 Maungawera Valley PA RCL

- 1.16** I attach the following appendix to my evidence:
- (a) **Appendix 1:** ‘PA Specific Submissions Summary, Landscape Comments Table’ and ‘Response to Submissions Version of the PA Schedule’ (ordered by PA).
- 1.17** I confirm that the landscape assessment methodology that I have applied in my review of landscape related submissions for the PAs set out in [1.15] above, is in accordance with TTatM.
- 1.18** During my review of the landscape related submissions, several common themes were identified, which were also consistent with themes identified during Ms Gilbert’s review of her 15 PAs. To avoid duplication of evidence, common themes found have been addressed in Ms Gilbert’s evidence.
- 1.19** Detailed comments in response to submissions points relevant to each PA are attached in **Appendix 1: PA Specific Submissions Summary: Landscape Comments** tables (referred to hereafter as the **PA Landscape Comments Tables**).
- 1.20** The **blue highlighted text** in the PA Landscape Comments Tables corresponds to changes that are recommended in the relevant **Response to Submissions Version of the PA Schedule** (in **Appendix 1**)
- 1.21** The **red text** in the PA Landscape Comments Tables corresponds to a submission point that is supported but is not specifically referenced in the relevant **Response to Submissions Version of the PA Schedule** (also in **Appendix 1**). This is typically because the submission point is general rather than confined to specific text amendments.
- 1.22** The **green highlighted text** in the PA Landscape Comments Tables corresponds to submission points that are cross-referenced in Ms Gilberts Evidence or Ms Evans’s S42A report.

- 1.23** The green wash line items in the PA Landscape Comments Tables correspond to the renotified submissions.
- 1.24** Where a submission point is accepted in full or in part, my work as part of the assessment of submissions has informed that recommendation (although this is not explicitly stated for each table entry).
- 1.25** My expert input has focussed on the following:
- (a) Review of the landscape related submission points that are relevant to the PAs set out in [1.15] above (refer **Appendix 1**: ‘PA Specific Submissions Summary, Landscape Comments Table’ and ‘Response to Submissions Version of the PA Schedule’ (ordered by PA)).
 - (b) Providing expert landscape advice with respect to recommended changes to the (relevant) Response to Submissions Version of the PA Schedules attached to the s42A Report (and my **Appendix 1**). Where appropriate, I have sought other expert advice to inform my recommendations including from Ms Gilbert, Ms Mellsop and Ms Ruth Evans – QLDC Consultant Planner and section 42A report author. I have also sought advice from Mr Daniel Hadfield – QLDC Senior Policy Planner and Mr Geoffrey Everitt – QLDC Policy Planner GIS Lead (the latter with regards to mapping).
 - (c) Discussion of more general landscape related submission points with Ms Gilbert.
- 1.26** I have been involved in the review of earlier iterations of Ms Gilbert’s evidence, particularly with regards to the response to the common themes and the Landscape Capacity Summary Table, of which I have provided input into. I have carefully read Ms Gilbert’s final evidence. I

agree with it and adopt the following topics and subtopics from her evidence in full:

3 BACKGROUND TO THE PA SCHEDULES PROJECT

4 PA SCHEDULE: METHODOLOGY

5 THEME 1: PA MAPPING AND REZONING

6 THEME 2: PA SCHEDULES METHODOLOGY

7 THEME 3: PA SCHEDULES PREAMBLES

8 THEME 4: PA SCHEDULES TEXT CHANGES

9 THEME 5: PA SCHEDULES LANDSCAPE CAPACITY

Documents relied on

1.27 The key documents that I have used or referred to in forming my view while preparing my evidence are:

- (a) Landscape Schedules Section 32 Report;
- (b) The PDP,² and in particular: Chapter 1 Introduction (dated December 2022), Chapter 2 Definitions (dated March 2023), Chapter 3 Strategic Directions (dated November 2021), Chapter 6 Landscapes (dated April 2022), Chapter 21 Rural (dated March 2023), Chapter 23 Gibbston Character Zone (dated March 2023), and Chapter 30 Energy and Utilities (dated April 2022), as updated by Environment Court decisions and consent orders;

² <https://www.gldc.govt.nz/your-council/district-plan/proposed-district-plan>

- (c) Relevant parts of the Partially Operative Otago Regional Policy Statement (**POORPS**) and the Proposed Otago Regional Policy Statement (**PORPS**);
- (d) Joint statement arising from expert conferencing for Topic 2 – Rural Landscapes; titled “Landscape methodology and subtopics 2, 3, 5, 6, 7, 8 and 11”, dated 29 January 2019;
- (e) Joint statement arising from expert planner and landscape conferencing for Topic 2 – Rural Landscapes; which related to “Strategic policies and priority area expert conferencing”, dated 29 October 2020;
- (f) Memorandum of Counsel on behalf of Queenstown Lakes District Council Addressing List of Proposed Priority Areas and Related Directions, Topic 2: Rural Landscapes 10 July 2020;
- (g) The following Environment Court Consent order:
 - i. Topic 1 subtopic 4 (RSI), Topic 2 subtopic 11 (RSI & Landscapes) and Topic 17 (Energy and Utilities) Consent Order (April 2023).
- (h) The following Environment Court Decisions:
 - i. Interim decision Topic 2: Rural Landscapes, Decision 2.2 - Sub-topics 2 - 11 Decision No. [2019] NZEnvC 205;
 - ii. Interim decision Topic 2: Rural Landscapes, Decision 2.3 - Sub-topic 1 remaining appeals Decision No. [2019] NZEnvC 206;
 - iii. Interim decision Topic 2: Rural Landscapes – Priority Areas Decision 2.5 Decision No. [2020] NZEnvC 158;
 - iv. Interim decision Topic 2: Rural Landscapes Chapters 3 and 6 Decision 2.7 Decision No. [2021] NZEnvC 60;

- v. Interim decision Topic 2: Rural Landscapes Sub-topic 1: mapping and s293 directions Decision 2.8 Decision No. [2021] NZEnvC 61;
- vi. Interim decision Topic 2: Rural Landscapes Provisions for Chapters 3 and 6 and s293 directions Decision 2.9 Decision No. [2021] NZEnvC 124; .
- vii. Interim decision Topic 2: Rural Landscapes, Chapters 3 and 6, Decision 2.12 Decision No. [2021] NZEnvC 155;
- viii. Interim decision Topic 2: Rural Landscapes, Section 293 determination on the Clutha River/Mata Au ONF corridor, Decision 2.14 Decision No. [2021] NZEnvC 198;

- (i) Water Conservation (Kawarau) Order 1997 (SR 1997/38).
- (j) The statement of landscape evidence prepared by Ms Bridget Gilbert on behalf of Council.
- (k) The s42A Report prepared by Ms Ruth Evans on behalf of Council.

1.28 The fact that I do not specifically refer to or address an aspect of a submission does not mean that I have not considered it, or the subject matter of that submission, in forming my opinion regarding the landscape appropriateness of the amendment(s) sought.

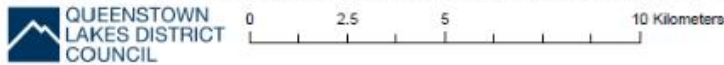
PA Mapping

1.29 The notified PA mapping is reproduced in **Figure 1** and **Figure 2** below. (NB A3 scale versions of these graphics are attached in Appendix 3 to Ms Gilbert's evidence.)

Wakatipu Landscape Schedules



The information provided on this map is intended to be general information only. While considerable effort has been made to ensure that the information provided on this map is accurate, current and otherwise adequate in all respects, Queenstown Lakes District Council does not accept any responsibility for content and shall not be responsible for, and excludes all liability, with relation to any claims whatsoever arising from the use of this map and data held within.

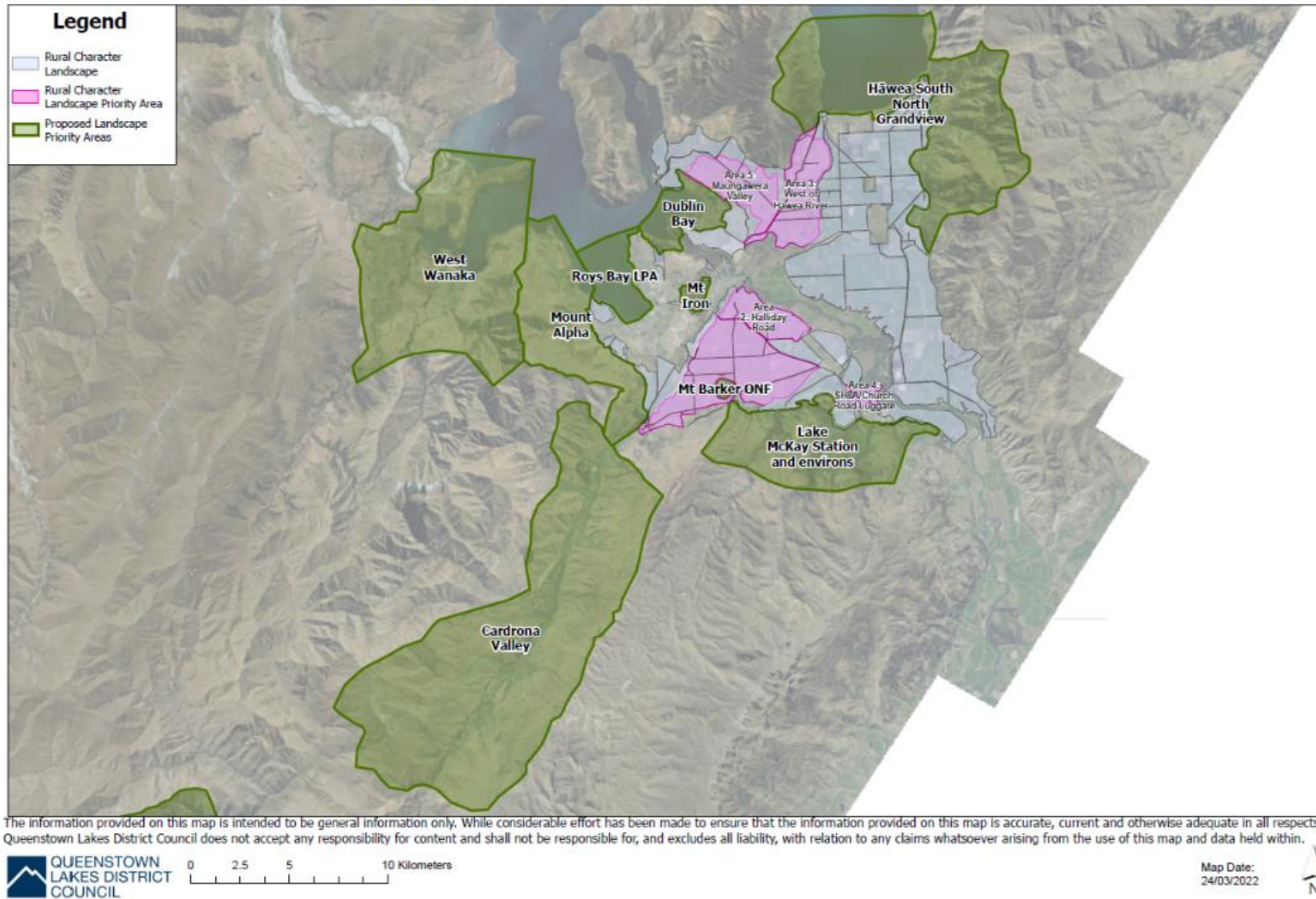


Map Date: 24/03/2022

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Figure 1: Notified mapping of the Whakatipu Basin PA ONF/Ls

Upper Clutha Landscape Schedules



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Figure 2: Notified mapping of the Upper Clutha PA ONF/Ls and PA RCLs

Jeremy Head

Date: 11 August 2023