

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER OF a variation to Chapter 21 – Rural of the Proposed District  
Plan to include Priority Area Landscape Schedules 21.22 and  
21.23

**STATEMENT OF EVIDENCE OF SCOTT SNEDDON EDGAR**

**ON BEHALF OF THE FOLLOWING SUBMITTERS:**

**SILVERLIGHT STUDIOS LIMITED (SUBMITTER #175)**

**CARDRONA DISTILLERY LIMITED (SUBMITTER #185)**

**UPPER CLUTHA TRANSPORT LIMITED (SUBMITTER #149)**

**ALPINE DEER NZ LP (SUBMITTER #146)**

**11<sup>th</sup> September 2023**

## **Introduction**

1. My name is Scott Sneddon Edgar. I am a Resource Management Planner and hold a Bachelor of Arts Degree (Honours) in Town and Country Planning from Strathclyde University in Glasgow, Scotland. I am an Associate Member of the New Zealand Planning Institute.
2. I am an independent planning consultant based in Wanaka. Prior to my current position I was employed by Southern Land Limited, a Wanaka based survey and planning consultancy, from October 2006 to November 2018. During my time at Southern Land I was involved principally with the preparation of resource consent applications and the presentation of planning evidence at Council hearings. I was also involved in the preparation of submissions and further submissions on Stages 1, 2 and 3 of the Proposed District Plan, participation in the Stage 1 hearings and subsequent appeals and Environment Court proceedings.
3. Prior to relocating to New Zealand in 2005 I worked as a development control planner with various Scottish local authorities in both rural and urban regions.
4. Upon my arrival in New Zealand I was employed as a resource consents planner in the Wanaka office of Civic Corporation Limited before taking up a position with Southern Land Limited. I have a total of 21 years' planning experience, 15 of which have been gained in New Zealand.
5. I have assisted in the resource consent processes to establish Silverlight Studios and the Cardrona Distillery and have been involved in the creation of the Rural Industrial Sub-Zone at Church Road through Stage 1 of the PDP and its extension to incorporate the Upper Clutha Transport site through Stage 3 of the PDP. I have since assisted Upper Clutha Transport in resource consent processes to relocate their yard from Main Road, Luggate to the Rural Industrial Sub-Zone on Church Road.

## **Code of Conduct**

6. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court of New Zealand Practice Note 2023 and I agree to comply with it. In that regard I confirm that this evidence is written within my expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## Scope of Evidence

7. I have been engaged by the following parties to provide expert planning evidence relating to the landscape schedules:
  - Silverlight Studios Limited (Submitter #175)
  - Cardrona Distillery Limited (Submitter #185)
  - Upper Clutha Transport Limited (Submitter #149)
  - Alpine Deer NZ LP (Submitter #146)
  
8. In preparing this evidence I have read and considered the following documents and information:
  - The notified landscape schedules, s32 Report and supporting documents;
  - The Proposed District Plan;
  - The Kāi Tahu Ki Otago Natural Resource Management Plan 2005;
  - The Cry of the People, Te Tangi a Taurira : Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008;
  - The Partially Operative Otago Regional Policy Statement 2019;
  - The Proposed Otago Regional Policy Statement 2021;
  - The s42A Report prepared by Ms. Ruth Evans;
  - The Evidence in Chief of Ms. Bridget Gilbert;
  - The Evidence in Chief of Mr. Jeremy Head; and
  - The Evidence in Chief of Mr. Ben Espie.
  
9. My brief of evidence is set out as follows:
  - Preambles and Capacity Rating
  - Silverlight Studios Limited

- Cardrona Distillery Limited
- Upper Clutha Transport Limited and Alpine Deer NZ LP

#### **PREAMBLES AND CAPACITY RATING**

10. I generally agree with and support the text amendments to the ONF/ONL Priority Areas Preamble and the Upper Clutha Rural Character Landscape Priority Areas Preamble ('the preambles') recommended by Ms. Gilbert and Ms. Evans.
11. In my opinion the text amendments generally provide useful guidance on the purpose of the schedules and the role they will play in assessing future plan change proposals and/or resource consent applications.
12. In addition the amendments to the preambles elaborates on and confirms the high level nature of the schedules and confirms that site/project specific landscape assessments will be required and may demonstrate higher than schedules capacity of development within individual sites.
13. Given the high level nature of the schedules however I agree with Mr. Espie<sup>1</sup> that the rating scale for landscape capacity is overly precise. In particular I consider that a 'no landscape capacity' rating is absolute and inappropriate due to the coarse grain of the landscape schedules and uncertainty regarding the nature and extent of future development proposals.
14. I therefore prefer the more nuanced approach set out in the alternative rating scale recommended by Mr. Espie in his EIC<sup>2</sup>.
15. On that basis, I support Ms. Gilbert and Ms. Evans' recommended text amendments to the preambles save for the format of the rating scale for landscape capacity. If Mr. Espie's alternative landscape capacity rating scale is to be adopted, which I believe it should be, it may require a more comprehensive review of the capacity rating for each land use category within each schedule. For that reason I have not offered any text amendments to the preambles as part of this evidence but consider that the adoption of Mr. Espie's alternative scale would be appropriate.

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<sup>1</sup> Paragraph 27 of Mr. Espie's EIC

<sup>2</sup> Paragraph 28 of Mr. Espie's EIC

### **s32AA Assessment of Recommended Text Amendments**

16. s32AA of the RMA requires that any changes that are proposed since the s32 assessment of a proposal was completed are further assessed at a level of detail consistent with the scale and significance of the changes. I consider that changes to the preambles and the landscape schedules as a whole to incorporate Mr. Espie's recommended landscape capacity rating scale will better reflect the high level, coarse grained nature of the landscape schedules and will introduce less absolute language which, in my opinion, better aligns with the intended purpose and application of the schedules.
17. On this basis I consider that the amending the landscape capacity rating scale in this manner would result in more efficient and effective schedules that will better achieve the objectives of the Proposed District Plan and the purpose of the RMA.

### **SILVERLIGHT STUDIOS LIMITED**

18. Silverlight Studios Limited's submission sought amendments to the notified schedule for the Halliday Road / Corbridge RCL Priority Area (21.23.2) to ensure that the presence of the consented film studios is recognised within the schedule.
19. The consent background and extent of the consented film studio development is described in the submission but in summary the film studios were approved by an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020. The consented development includes approximately 1,600,000m<sup>3</sup> of earthworks, landscaping, the creation of an 11 hectare man-made lake, the construction of up to 12 sound stage buildings each to a maximum height of 17m and the construction of production support facilities, accommodation, a film school, theatres and commercial recreation activities.
20. A tracked changes version of the Halliday Road/Corbridge RCL Priority Area schedule is attached as **Appendix 1** to this evidence. The attached schedule is based on the tracked changes version appended to the EIC of Mr. Head and includes further amendments that I consider are necessary in order to more accurately describe the attributes that contribute to the character and visual amenity values of the Priority Area, the values that are to be maintained and the landscape capacity for various activities. In making these recommended amendments I have consulted with Mr. Espie and rely on his expertise on landscape matters.
21. The amendments that I recommend to the text of the schedule are as follows:

## General Description of the Area

22. I generally support Mr. Head's recommended addition to the paragraph, which is the addition of the following sentence:

*The terraces include a 322 hectare site to the west of Wānaka airport where a film studio and associated activities has been recently consented.*

23. Having consulted with Mr. Espie however I consider that the 322 hectare site is located within the rolling moraine downlands rather than on the terraces (which I understand to be the terraces that step down to the Cardrona River / Ōrau at the western end of the PA).

24. In addition, I would note that the site is not entirely contained within the PA, with the northern edge and southern end of the site being located outside of the PA. I'm therefore of the opinion that it would be appropriate to acknowledge that within the general description as it is relevant when describing the extent of the PA that is made up of the Silverlight site at Paragraph 15 of the schedule.

25. I therefore consider that the addition to the 'General Description of the Area' paragraph is worded as follows (deletions shown ~~struck through~~ and additions shown underlined):

*The ~~terraces~~ rolling moraine downlands include a 322 hectare site (approximately 234 hectares of which is within the PA) to the west of Wānaka airport where a film studio and associated activities has been recently consented.*

## Important landforms and land types

26. A key feature of the Silverlight Studios site, and one that has enabled the consenting of the film studios development, is the central basin that will accommodate the majority of the consented built development. The basin has proved to be capable of absorbing approximately 25 hectares of built development with building heights of up to 17m while maintaining the landscape character and visual amenity values of the wider site and RCL.

27. I therefore consider that the central basin should be acknowledged as an important landform within the PA by adding the following sub-paragraph under Paragraph 3 of the schedule:

**d. a sizeable basin within the rolling glacial moraine downlands.**

## Important hydrological features

28. Paragraph 7 of the schedule lists irrigation reservoirs/ponds within the rolling glacial till downlands under important hydrological features within the PA. While irrigation reservoirs and ponds may be physical attributes of the PA I consider, having consulted Mr. Espie, that they are of lesser importance to the landscape character and visual amenity values of the PA than natural hydrological features such as the Cardrona River / Ōrau.
29. While I accept that it is appropriate to note the presence of reservoirs and ponds as physical attributes I consider that listing them under 'Important hydrological features' overstates their importance to the values of the PA. I therefore consider that the following qualifier should be added to Paragraph 7:

7. *Irrigation reservoirs/ponds, **albeit of lesser importance**, within the rolling glacial till downlands, with varying levels of permanent water.*

#### **Important ecological features and vegetation types**

30. Vegetation associated with the Silverlight Studios development will comprise the retention and maintenance of existing shelter belts for visual mitigation and aesthetic landscaping intended to recreate a section of New York's Central Park and a 'European' park. Once mature trees associated with the parks within the Silverlight Studios site will be a visible component of the PA and should be included under the description of ecological features and vegetation types. I therefore consider that the following paragraph should be added to the schedule:

**12. Vegetation associated with the film studios on the rolling glacial moraine downlands.**

#### **Important land use patterns and features**

31. I generally support Mr. Head's recommended amendments to Paragraph 15<sup>3</sup>. Silverlight Studios' submission (which I prepared) incorrectly states that the Silverlight Studios site comprises half of the PA. That statement was based on the total site area of 322 hectares and the approximate PA size of 605 hectares. As noted in Paragraphs 21 and 22 of this evidence however the Silverlight Studios site is not entirely contained within the PA. Approximately 234 hectares of the Silverlight Studios site is contained within the PA and therefore I consider it would be more accurate to describe the Silverlight Studios site as comprising over one third, rather than half, of the PA.

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<sup>3</sup> Paragraph numbering based on the tracked changes version of the schedule appended to this evidence following the addition of my recommended Paragraph 12.

32. In addition, while the majority of the built development on the Silverlight Studios site will be contained within the central basin, roading, parking, infrastructure and landscaping extends beyond the basin. In addition, film studio activities, which include outdoor filming activities, earthworks and the construction of temporary sets (which may each be up to 4,000m<sup>2</sup> in area, 16m in height and remain on site for up to 6 months at a time), can be undertaken almost anywhere on the site. I therefore consider that it would be inaccurate to state that the film studio and activities are limited to part of the site.

33. Further I consider that it would be more accurate to state that the Silverlight Studios site is located on the rolling moraine downlands. I therefore recommend that Paragraph 15 of the schedule is amended as follows:

15. *A combination of pastoral farming or cropping and latterly, commercial activity, particularly on the rolling moraine downlands. The alluvial terraces support mainly hobby farming or more intensive farming, with vineyards, orchards and a plant nursery. A 322 hectares site **on the rolling moraine downlands includes land that** comprises over **half one third** of the Halliday Road/Corbirdge PA, ~~part of which and~~ includes a recently consented film studio and associated activities. Events such as weddings and concerts have been held at Corbridge Estate.*

34. I support the wording of Paragraph 16 of the schedule however I would suggest that the final sentence of the paragraph is amended to make reference to the sound stages, being the biggest component and the studio development to which all other activities will be ancillary. I therefore recommend the following amendment to the final sentence of Paragraph 16:

*The development includes a film studio complex including **sound stages**, film location sets, buildings for post-production facilities, film school, screening theatre, film exhibition centre and supporting facilities along with associated infrastructure for the film studio.*

#### **Important shared and recognised attributes and values**

35. The notified schedule states at Paragraph 27<sup>4</sup> that the PA is:

*Valued as part of the rural approach to Wānaka from the east on Wānaka Luggate Highway, with open views across rolling or level pasture and cropping land.*

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<sup>4</sup> Paragraph numbering based on the tracked changes version appended to this evidence.



36. I agree that the open views across the pasture and cropping land is valued as part of the approach to Wānaka. I consider that, in consultation with Mr. Espie, this paragraph should be added to in order to acknowledge that while these views may be subject to some change as a result of the implementation of the film studio consents the overall visual amenity will be maintained.

37. I therefore consider that Paragraph 27 should be amended as follows:

27. *Valued as part of the rural approach to Wānaka from the east on Wānaka Luggate Highway, with open views across rolling or level pasture and cropping land. **While the available views may be subject to change resulting from the earthworks and landscaping associated with the consented film studios visual amenity will be maintained.***

#### **Legibility and expressiveness attributes and values**

38. Paragraph 30 of the schedule lists the gently rolling open landform of the glacial till moraine as a legibility and expressiveness attribute. I agree but consider that it is important to note that, in places the gently rolling landform will be subject to a degree of change as a result of the consented development. I therefore consider that the following should be added:

30. *The gently rolling open landform of the glacial till moraine, appreciated from Wanaka Luggate Highway and from Mount Iron, **acknowledging that some naturalistic modification of this landform adjacent to the highway is enabled as part of the consented film studio activities.***

#### **Particularly important views to and from the area**

39. As with the description of legibility and expressiveness, the description of ‘particularly important views’, at Paragraph 31, describes the view from the highway across open pasture and cropping land to the hills and mountains beyond as being important. Again I agree that these views are of importance but consider that acknowledgment should be made that there will be some degree of change to these views. I therefore consider that the wording of Paragraph 31 should be amended as follows:

31. *Highly attractive views from Wanaka Luggate Highway across open pasture or cropping land to the hills and mountainous ONL of the Upper Clutha Basin, or to rising moraine landform and shelterbelts **(again, acknowledging that naturalistic landform***

***modification is enabled as part of the consented film studio activities***). The highly coherent pattern of large open paddocks alternating with linear shelterbelts across the majority of the PA, together with the undulating nature of the terrain, general lack of visible dwellings and changing pasture/crop colours across the seasons add to the pleasantness and strong rural character of the views.

40. The Silverlight Studios development will be visible from the summit of Mount Iron. I therefore consider that Paragraph 33 should be amended as follows to reflect this:

33. *Views from the summit of Mount Iron, where the panoramic vistas available to the east take in the Cardrona River, the river terraces and prominent escarpment, and the undulating pastoral moraine land and shelterbelts extending to the east **and including the film studios**.*

#### **Naturalness attributes and values**

41. Paragraph 34 describes the naturalness attributes and values of the PA and concludes that:

*Overall there is a moderate level of naturalness, with a predominance of natural rather than built elements, but human intervention as managed farmland and rural living is evident.*

42. The Silverlight Studios development involves extensive built development, so within parts of the PA there will be a predominance of built form rather than natural elements. That being said, I accept and agree that, at a high level PA scale, natural rather than built elements will still be predominant. I consider, however, that the final sentence of Paragraph 34 should be amended as follows:

*Overall there is a moderate level of naturalness, with a predominance of natural rather than built elements, but human intervention as managed farmland, ~~and~~ rural living **and film studio activities** is evident.*

#### **Transient attributes and values**

43. The consented film studios includes the ability to use the wider site as “back lots” for temporary filming activities. Sets (such as houses, forts, castles or villages) are commonly constructed on back lots for the duration of the particular film shoot. The Silverlight Studios consents provide for the construction of temporary sets on the back lots subject to the following limitations:

- That no individual set remains on site for longer than 6 months;
- That no set exceeds 4,000m<sup>2</sup> in area or 16m in height;
- That all sets are setback a minimum of 30m from the edge of the escarpment that falls to the Clutha River / Mata Au at the northern end of the PA;
- That earthworks associated with temporary sets and temporary film making activities are undertaken in accordance with the approved Environmental Management and Erosion and Sediment Control Plans.

44. The temporary filming and set construction will therefore be a transient attribute within the landscape and, while it may not contribute to the values to be maintained, these activities should be acknowledged within the schedule. I therefore consider that Paragraph 35 should be amended as follows:

35. *Transient attributes of the landscape include seasonal foliage and pasture or crop colours, the changing shadow patterns from shelter belts, and the presence of stock and wildlife such as hawks. **Occasional temporary film set activities will have some influence in part of the PA.***

#### **Remoteness/wilderness attributes and values**

45. The consented activities on the Silverlight Studios site include film making, set construction, production support, retail, catering, tourism, film school, theatre and conference activities. Film making and set construction activities can be undertaken 24 hours a day subject to compliance with an approved Temporary Filming Management Plan while the hours of operation for the public elements of the development can generally commence between 7:00 and 8:00am and continue through to between 10pm and midnight.

46. The public elements of the development will generally be confined to the central basin where the built development is focused. However temporary film making and set construction can be undertaken across the majority of the site. There will be noise, light and activity associated with the temporary film making and set construction as well as the public elements of the development and while the effects of noise, light and activity will be managed through a suite of management plans they are not likely to be entirely unnoticeable and may at times reduce the sense of rural tranquillity and quietness experienced within parts of the PA. I consider that

this should be recorded in the description of remoteness/wilderness attributes and values by amending Paragraph 36 as follows:

36. *Rural tranquillity and quietness are currently experienced in those parts of the PA away from Wānaka Luggate Highway, where there are low traffic volumes and the levels of activity are consistent with working farmland, hobby farming and low-density rural living. **In some parts of the PA however noise, light and activity associated with the film studios will at times be apparent.***

#### **Aesthetic attributes and values**

47. While some modification of the landform and vegetation along the Wanaka – Luggate Highway frontage of the Silverlight Studios site will occur, the film studio development has been designed to blend in with the natural landform and retain the rolling pastoral character that currently exists. While the studio development is extensive and includes urban elements, it is well integrated with topography and vegetation. I therefore consider that Paragraph 38 b. is amended as follows:

- b. *Strong rural character, with large areas of open space – either pastoral or cropping – retained adjacent to Wanaka Luggate Highway, a sense of spaciousness, and rural living development **and film studio activities being** generally integrated by topography and/or vegetation.*

#### **Summary of Landscape Values**

48. I support Mr. Head's addition to the summary of perceptual values that notes that recently consented activities may alter the perceptual values for parts of the PA.

#### **Landscape Capacity**

49. As outlined above I agree with and adopt Mr. Espie's recommended alternative ratings scale for landscape capacity. It follows that should Mr. Espie's rating scale be adopted there will be consequential amendments to the landscape capacity section of each schedule. I have not included those amendments in my tracked changes version of the schedule as I expect additional reasoning and qualifiers may need to be added for certain activities.
50. I do however consider that the landscape capacity rating should be amended to reflect the urban character of the built elements of the film studios.

51. With regard to urban expansions it should be noted that parts of the Silverlight Studios development will be urban. Given the scale of the consented buildings, the extent of infrastructure required to support the development and the fact that sections of New York, Paris and Venice will be recreated on site, the development is clearly urban.
52. At Paragraphs 10.12 and 10.13 of her EIC, Ms. Evans confirms that the term urban expansion is intended to mean the rezoning of land to an urban zone or urban development through a resource consent process. Ms. Evans recommends an addition to the landscape schedule preambles to clarify what constitutes urban expansion in relation to the landscape schedules and their capacity ratings.
53. I consider that Ms. Evans' addition to the preambles is helpful and support that addition.
54. The Silverlight Studios development is in a somewhat unusual position in that it has been recently consented despite being contrary to the PDP objectives and policies that seek to contain urban development within urban growth boundaries and/or land zoned for that purpose. Despite the urban nature of the film studios development, it is well contained by landform and vegetation such that the landscape character and visual amenity of the wider RCL will be maintained.
55. In order to address inconsistency with the PDP objectives and policies, it would seem sensible to rezone the urban elements of the film studio development. To that end there is a live appeal on Stage 3 of the PDP through which Silverlight Studios are seeking the rezoning of the site to an appropriate zone that provides for the range of activities enabled by the consents.
56. I consider that the capacity rating for urban expansion should reflect this. I therefore recommend that the capacity rating for urban expansion is listed as 'Very limited to no capacity' (or if Mr. Espie's alternative scale is adopted 'Unlikely to be capacity for this activity in any locations within the PA').
57. I consider that the 'Very limited to no landscape capacity' or 'Unlikely to be capacity for this activity in any locations within the PA' rating for urban expansion should clarify that any capacity for urban expansion would only relate to the application of an urban zoning or UGB around existing urban development rather than there being capacity for urban expansion through resource consent. On this basis I recommend that the capacity rating for urban expansion is amended to read as follows:

- iii. **Urban expansions – Very limited to no landscape capacity / Unlikely to be capacity for this activity in any locations within the PA] with any capacity for urban expansion being limited to plan changes that seek to apply an urban zoning and/or urban growth boundary around existing development that is urban in character.**

#### **s32AA Assessment of Recommended Text Amendments**

58. s32AA of the RMA requires that any changes that are proposed since the s32 assessment of a proposal was completed are further assessed at a level of detail consistent with the scale and significance of the changes. I consider that the proposed changes to the Halliday Road / Corbridge RCL Priority Area Schedule (21.23.2) will more accurately describe the attributes that contribute to the landscape character and visual amenity values of the PA that are to be maintained or enhanced (in the case of visual amenity values). In addition I consider that the proposed amendment to the capacity rating for urban expansion will better reflect the existing environment and the unique circumstances of the film studio development without compromising the identified values of the PA.
59. On this basis I consider that the proposed changes will result in a more efficient and effective schedule that will better achieve the objectives of the Proposed District Plan and the purpose of the RMA.

#### **CARDRONA DISTILLERY LIMITED**

60. The submission of Cardrona Distillery Limited related to the Cardrona Valley ONL Priority Area Schedule (21.22.18) and sought that the schedule better reflect the established distillery complex.
61. The Cardrona Distillery is located on the east side of Cardrona Valley Road, opposite the access to Cardrona Alpine Resort. The distillery includes three reasonably substantial buildings positioned in a U-shape around a central courtyard. The buildings include the distillery building, a barrel store and a café/restaurant/reception building.
62. In addition to the distillery buildings the distillery complex includes an array of ancillary structures including grain silos, fuel tanks, water tanks, sheds and containers.
63. A tracked changes version of the Cardrona Valley ONL Priority Area schedule is attached as **Appendix 2** to this evidence. As with **Appendix 1** the attached schedule is based on the tracked changes version appended to the EIC of Mr. Head and includes further amendments that I

consider are necessary in order to more accurately describe the attributes and contribute to the character and visual amenity values of the Priority Area, the values that are to be maintained and the landscape capacity for various activities. In making these recommended amendments I have consulted with Mr. Espie and rely on his expertise on landscape matters.

64. The amendments that I recommend to the text of the schedule are as follows:

**Important land use patterns and features**

65. Paragraph 15 of the notified schedule makes indirect reference to the Cardrona Distillery where it states:

*Some rural living development is present north and south of the village, and there is a loose cluster of tourism-related development near the Cardrona Alpine Resort Road intersection.*

66. Mr. Head states in his submission summary table that forms part of his EIC that the distillery complex forms part of the loose cluster of tourism-related development and does not warrant individual mention. I disagree.

67. It is unclear from the schedule how far the 'loose cluster' of development extends however if it is limited to the cluster of buildings to the west of the skifield access then it includes the distillery buildings, a compound associated with the Southern Hemisphere Proving Grounds vehicle testing facilities, a farm building, a hanger and a building associated with established horse trekking and quadbike tour activities. If the cluster extends to the eastern side of the Cardrona River then it would include farm buildings on Cardrona Valley Farm.

68. At Paragraph 10.10 and 10.11 of the s42A Report Ms Evans confirms that, based on the Landscape Methodology Statement, the term 'tourism related activities' is intended to mean resorts. To that end Ms. Evans recommends that the preambles to the landscape schedules is amended to include the following definition:

*Tourism related activities: has the same meaning as 'Resort' in Chapter 2.*

69. The Chapter 2 definition of 'Resort' is as follows:

*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.*

70. The loose cluster of development does not include any residential or visitor accommodation activities. Neither is it an integrated and planned development but rather is a cluster of development that has occurred in an ad hoc manner over time. The loose cluster is not a resort and therefore it would be inaccurate to describe it as a cluster of tourism related development (albeit that there are commercial recreation elements within it).
71. In addition the distillery is arguably the most recognisable element of the loose cluster of development I therefore I am of the opinion that it does warrant specific mention as it helps clarify the cluster location.
72. I consider that the cluster of development should be described more accurately and therefore recommend that Paragraph 15 is amended as follows:

15. *Cardrona Village (Settlement Zone) is the main settlement within the valley, but significant urban development is anticipated and is starting to occur within the Mount Cardrona Special Zone. Some rural living development is present north and south of the village, and there is also a loose cluster of ~~tourism-related~~ **farming, rural industrial, commercial and commercial recreation** development, **including the Cardrona Distillery** near the Cardrona Alpine Resort Road intersection. Widely spaced station homestead clusters set within areas of mature exotic trees are a feature of the flats and lower valleys, and there are a few consented but undeveloped building platforms in the Timber Creek gully on Hillend Station.*

#### **Important recreation attributes and values**

73. I support Mr. Head's recommended amendment to Paragraph 35 to include reference to the distillery as an important commercial recreation activity within the PA.

#### **Particularly important views to and from the area**

74. The submission seeks to ensure that the presence of the distillery is acknowledged in the description of important views. In his submission summary table Mr. Head states in response to OS 185.2:



*“I do not support the submission that distillery activities contribute to ONL values in terms of ‘particularly important views to and from the area’, ‘aesthetic attributes and values’ and naturalness attributes and values’.*

75. Paragraph 42 describes the views available from Cardrona Valley Road which are undoubtedly important views. The description of those views notes Cardrona Alpine Resort and Mount Cardrona Station as respectively being “reasonably difficult to see” and “largely screened by rising topography”. The distillery complex is perhaps the most visible built development along Cardrona Valley Road outside of the Cardrona settlement. At paragraph 70 of his EIC Mr Espie describes the distillery as:

*“a clearly visible node of built development. The distillery is a plainly recognisable and memorable aspect of the road journey through the valley, with its distinctive gabled, stacked schist buildings.”*

76. I agree with Mr Espie in this regard and consider that reference should be made to the distillery complex within Paragraph 42. Regardless of whether or not its visibility contributes positively to the values of the ONL, it is a plainly visible element within the important views from Cardrona Valley Road and should be acknowledged as such. I therefore consider that Paragraph 42 should be amended as follows:

42. *Dramatic and highly attractive views from Cardrona Valley Road to the contained valley floor and enclosing mountains. The scale of the landforms and their proximity dwarf the viewer, giving a sense of sublime grandeur. There is a progressive opening up of views as people move down the valley, particularly north of the Cardrona Village node. From this point the consistent ‘wall’ of the Pisa/Criffel range, with its open, natural and relatively wild character, dominates views across the sparsely inhabited ‘working farm’ rural foreground. **Occasional nodes of built development, including the Cardrona Distillery are visible in the foreground views from Cardrona Valley Road.** To the west, views are often enclosed by the pastoral land of the Cardrona low hills but in places (eg. north of Cardrona Village, Branch Creek, Spotts Creek and Timber Creek) vistas open out to the rugged and often snow-covered Mount Cardrona and Harris Mountains in the distance. The Cardrona Alpine Resort is reasonably difficult to see from the road and the Mount Cardrona Station Special Zone is largely screened by rising topography.*

### **Naturalness attributes and values**

77. As with the description of important views discussed above, I consider that the presence of the distillery should be acknowledged in the description of naturalness attributes and values. I do not agree with Mr. Head's statement in response to OS 185.2 that the distillery does not contribute to the ONL values in terms of naturalness attributes and values. It may not contribute positively to the naturalness of the Cardrona Valley but it does warrant a mention alongside the Cardrona settlement, skifields and Mount Cardrona Special Zone. I therefore consider that Paragraph 45 should be amended as follows:

45. *The presence of development on the valley floor, in Cardrona Village, in Mount Cardrona Special Zone, **at the Cardrona Distillery** and in the Ski Area Sub-Zone (including access roads) modifies perceptions of naturalness, but pastoral land on the valley floor is still perceived as a pleasant rural foreground to the mountains and hills and retains a significant level of naturalness. The ski areas, village, **distillery** and special zones are nodes of human occupation and development within a landscape dominated by natural patterns and farming land use.*

### **Aesthetic attributes and values**

78. As outlined above, Mr Espie is of the opinion that the Cardrona Distillery buildings are a recognisable and memorable part of the road journey through the Cardrona Valley. I agree and consider that the following should be added to Paragraph 51 e. of the schedule:

**vi. the heritage style buildings of the Cardrona Distillery**

### **Landscape Capacity**

79. As outlined above I agree with and adopt Mr. Espie's recommended alternative ratings of landscape capacity.
80. With regard to the distillery activities and how they may fit into the various categories of land use activities, I agree with Mr. Head (in his response to submission point OS 185.3 in the Submissions Summary table appended to his EIC) to an extent in that the commercial recreation element of the distillery activities is appropriately captured under *Commercial recreational activities* and I agree that a 'some landscape capacity' / 'likely to be capacity for this activity in various locations within the PA' rating is appropriate.

81. I do not agree however that ‘commercial recreational activities’ captures all of the distillery activities. The distillery is first and foremost a production facility. The commercial and commercial recreation elements of the activities are ancillary to the production of spirits on site. The distillery complex comprises three main buildings, being the distillery building itself, a barrel store and a reception/café/museum building. The spirits are made from water taken from an on site well, malted barley and yeast. While the barley is grown and malted in Canterbury, it is a rural product. The PDP definition that best fits the Cardrona Distillery’s production activities is as follows:

*Rural Industrial Activity*                      *Means the use of land and buildings for the purpose of manufacturing, fabricating, processing, packing and/or storage of goods and materials grown or sourced within the Rural Zone and the storage of goods, materials and machinery associated with commercial contracting undertaken within the Rural Zone.*

82. I consider that, given that the distillery is primarily a rural industrial activity, it would be appropriate to include a landscape capacity rating for those activities. I therefore recommend that the following is inserted into the schedule:

**Rural Industrial Activities – Very limited landscape capacity / Unlikely to be capacity for this activity in more than a very few locations within the PA. If and where such development is appropriate, it will have been co-located with existing rural industrial development on the valley floor and is of a modest or sympathetic scale; has a low-key, visually recessive ‘rural’ character; and complements the existing character of Cardrona settlement or the wider valley floor.**

#### **s32AA Assessment of Recommended Text Amendments**

83. s32AA of the RMA requires that any changes that are proposed since the s32 assessment of a proposal was completed are further assessed at a level of detail consistent with the scale and significance of the changes. I consider that the proposed changes to the Cardrona Valley ONL Priority Area Schedule (21.22.18) will more accurately describe the attributes that contribute to the landscape values of the PA that are to be protected. In addition I consider that the addition of a capacity rating for rural industrial activities that is tied to established rural industrial activities and appropriately designed and located will better reflect the existing environment without compromising the identified values of the PA.

84. On this basis I consider that the proposed changes will result in a more efficient and effective schedule that will better achieve the objectives of the Proposed District Plan and the purpose of the RMA.

**UPPER CLUTHA TRANSPORT LIMITED AND ALPINE DEER NZ LP**

85. The submissions of Upper Clutha Transport (UCT) and Alpine Deer NZ LP (ADNZ) relate to the Church Road – Shortcut Road RCL PA schedule and seek to ensure that presence of established and zoned rural industrial activities within the PA is more clearly expressed. The relief sought by UCT and ADNZ is the same and therefore I will address their submissions and the recommended amendments to the Church Road – Shortcut Road RCL PA schedule together.

**Important land use patterns and features**

86. I support Ms. Gilbert’s recommended amendments to Paragraph 12 of the schedule to more accurately describe the extent of existing rural industrial activities within the PA.

**Important shared and recognised attributes and values**

87. I support Ms. Gilbert’s recommended amendments to Paragraph 24 which acknowledge the presence of rural industrial activities on the east site of Church Road and the role they play in supporting the Luggate settlement.

**Particularly important views to and from the area**

88. I support Ms. Gilbert’s recommended amendments to Paragraphs 31, 32 and 33 which acknowledge the presence of rural industrial activities within important views.

**Naturalness attributes and values**

89. I support Ms. Gilbert’s recommended amendment to Paragraph 34 which references rural industrial activities to the east of Church Road.

**Remoteness/wilderness attributes and values**

90. I support Ms. Gilbert’s recommended amendment to Paragraph 40 which removes reference to impressions of rural tranquillity and quietness along Church Road.

### **Summary of Landscape Values**

91. I support Ms. Gilbert's recommended addition to Paragraph 43 (summary of physical values) which recognises rural industrial activities as an established land use within the PA.

### **Landscape Capacity**

92. I support Ms. Gilbert's addition of a landscape capacity rating for Rural Industrial Activity and, based on the understanding that the capacity ratings relate to activities and development that is not enabled by the Plan, I accept the 'very limited' capacity rating.
93. On this basis I do not recommend any further amendments to the Church Road – Shortcut Road RCL PA schedule beyond those set out in Ms. Gilbert's EIC. I have not therefore appended a tracked changes version of the Church Road – Shortcut Road RCL PA schedule to this evidence.
94. Notwithstanding the above, if Mr. Espie's alternative capacity rating format is adopted (which I support) I expect it would be applied to all schedules.

### **s32AA Assessment of Recommended Text Amendments**

95. Given that I am not recommending any amendments to the Church Road – Shortcut Road RCL PA schedule aside from the adoption of Mr. Espie's alternative landscape capacity rating scale a s32AA assessment of the proposed amendments is not required beyond that of Ms. Evans and the assessment included above in relation to the landscape capacity rating scale.



Scott Sneddon Edgar

11<sup>th</sup> September 2023

### **APPENDICES:**

- 1. 21.23.2 HALLIDAY ROAD / CORBRIDGE RCL PA SUBMISSIONS SCHEDULE – SCOTT EDGAR TRACKED CHANGES**
- 2. 21.22.18 CARDRONA VALLEY ONL PA SUBMISSIONS SCHEDULE – SCOTT EDGAR TRACKED CHANGES**