

**BEFORE THE HEARINGS PANEL APPOINTED BY THE QUEENSTOWN LAKES
DISTRICT COUNCIL**

Under the Resource Management Act 1991 (**Act**)

In the matter of the Upper Clutha Landscape Schedules variation to the
Queenstown Lakes Proposed District Plan

On behalf of Sunnyheights Ltd and Scott Aubrey Family Trust

SUMMARY EVIDENCE OF SCOTT EDGAR (PLANNER)

2nd September 2026

Introduction

1. My name is Scott Edgar and my qualifications and experience are set out in my Evidence in Chief (EiC) dated 26th June 2026.
2. I participated in expert conferencing on the 6th and 9th of July 2026 and signed the resulting Joint Witness Statement (the JWS) dated the 14th of July 2026. The JWS sets out points of agreement and disagreement between the landscape and planning experts that attended the conferencing.
3. Following the conferencing and JWS, Ms Frew and Ms Gilbert filed rebuttal planning and landscape evidence on behalf of QLDC, dated 12th of August 2026.
4. This summary statement sets out my expert opinion following the conferencing and JWS and in response to Council's rebuttal evidence, as it relates to the submissions of Sunnyheights Ltd and the Scott Aubrey Family Trust.

Summary of Evidence Relating to the Submission of Sunnyheights Ltd and the Scott Aubrey Family Trust

5. The submissions of Sunnyheights Ltd. and the Scott Aubrey Family Trust were in relation to the Crosshill and East of Luggate landscape schedules respectively.

6. It is recorded in the JWS that the text of the Crosshill and East of Luggate landscape schedules has been fully agreed. While I was not party to the conferencing in relation to these schedules I support the wording agreed between Ms Gilbert and Mr Espie if it is determined that the non-PA RCLs should be scheduled.
7. On that basis the only matter of disagreement between Council's experts and myself is in relation to the policy support for, and appropriateness of, the scheduling of the non-PA RCLs of the Upper Clutha.
8. My EiC sets out the higher order provisions of the Proposed District Plan which direct that the values and attributes of the District's ONF/Ls and RCLs and their capacity to absorb development are to be identified. This is to be done in one of two ways.
9. The values, attributes and capacity of the ONF/L and RCL Priority Areas are to be scheduled using the values identification framework. The values, attributes and capacity of all landscapes outside of the Priority Areas are to be identified through the landscape assessment methodology.
10. In my opinion the direction set out in the higher order provisions is clear, efficient and effective and on that basis I consider that it is unnecessary and inefficient to schedule the non-PA RCLs. Further, in doing so I consider that inconsistency and uncertainty will be introduced into the plan that does not currently exist.
11. In her rebuttal evidence Ms Frew acknowledges that there is no direction within the higher order provisions of the Plan to schedule the non-PA RCLs. She however states that there is no direction not to schedule the non-PA RCLs. I do not consider this a sound basis to deviate from the clear and effective approach to the identification of the values, attributes and capacity of the non-PA RCLs as set out in the higher order provisions.
12. Further Ms Frew states that the content of the non-PA RCL schedules is consistent with the landscape assessment methodology required under SP 3.3.45. I disagree. I consider that the schedules are consistent with the values identification framework set out in SP 3.3.39 to 3.3.41 however the values identification framework differs from the landscape assessment

methodology which is intended to be used in relation to individual development proposals within the non-PA RCLs.

13. The landscape assessment methodology directs that a landscape character area is defined along with its wider context, that the landscape character and visual amenity values of that landscape character area and wider context are identified and that the effects of the development proposal on those values and related landscape capacity are assessed.
14. I consider that the landscape assessment methodology will ensure that the landscape character and visual amenity values of the non-PA RCLs are identified and maintained or enhanced based on an assessment of those values at the time development is proposed. I consider this approach to be efficient and responsive.
15. In the JWS and Council's rebuttal evidence there was discussion of whether consistent capacity rating scales could be achieved through the landscape assessment methodology set out under SP 3.3.45. with Ms Frew and Ms Gilbert considering that the landscape assessment methodology does not set out how a consistent rating scale for attributes, values and effects is to be achieved. I disagree. SP 3.3.45 includes a note which states that Council may promulgate, update and publish guidelines that provide assistance in the application of best practice landscape assessment methodologies. In my opinion the purpose of this note is to allow Council to specify how consistent rating scales are to be achieved.
16. The 'hook' that will ensure that plan users and Council utilise the non-PA landscape schedules, as set out in Ms Frew's rebuttal relies on the insertion of a footnote in the landscape schedule pre-amble that draws plan users attention to assessment matter 21.21.2.1.a. which states that Council will have regard to the landscape schedules. However assessment matter 21.21.2.1.b. directs Council to have regard to the landscape character and visual amenity values identified in accordance with SP 3.3.45, being the landscape assessment methodology to be applied to the non-PA RCLs.
17. I consider that the 'hook' that Council would rely on is confusing and conflicts with the higher order provisions of the Plan and, to be effective, would require that plan users first refer to the landscape schedule pre-amble and then the

assessment matters rather than taking a top down approach following the higher order provisions of the plan.

18. Overall I consider that the scheduling of the non-PA RCLs is not an appropriate means of achieving the objectives of the Proposed District Plan and the purpose of the RMA.

Scott Edgar

2 September 2026