

BEFORE THE

Queenstown Lakes District
Council

IN THE MATTER OF

Resource Management Act
1991

AND

IN THE MATTER OF

Upper Clutha Landscape
Schedules Variation

**STATEMENT OF EVIDENCE OF RACHEL SHALINI THOMAS AND ANNA MICHELLE
GILLESPIE ON BEHALF OF THE OTAGO PROVINCE OF FEDERATED FARMERS OF
NEW ZEALAND**

Dated 26 August 2026

INTRODUCTION

1. This is a joint statement of evidence given by Rachel Thomas and Anna Gillespie on behalf of Otago Federated Farmers of New Zealand Inc (**Federated Farmers**) in relation to the Upper Clutha Landscape Schedules Variation (**the Variation**).
2. This evidence is given in a representative capacity for the submitter, Otago Federated Farmers. It is not offered as expert landscape or planning evidence. Where landscape opinion is relevant we adopt, or cross-refer to, the evidence of the landscape and planning experts called by other submitters.

Rachel Thomas: Qualifications and Experience

3. My name is Rachel Shalini Thomas. I hold a Bachelor of Arts (Hons) in Political Science from the University of Otago and a Master of Public Policy from Victoria University. I am currently studying towards a Master of Planning from Lincoln University and am a student member of NZPI. I have been employed in the policy and planning sector for over eleven years.
4. I previously worked as a Policy Advisor for the Ashburton District Council for seven years, working across policy and local government matters. I have been employed by Federated Farmers for over four years as a Senior Policy Advisor in the Regional Policy Team.
5. My role is to assist with planning matters and provide policy advice and advocacy on behalf of Federated Farmers members in processes arising under the Resource Management Act 1991 (**the Act**), Local Government Act 2002, and Local Government (Rating) Act 2002. I analyse, submit, and present at hearings. My work is informed and mandated by our elected representatives and local members.
6. I also have practical farming experience. Our family own and operate Longbeach Estate in Ashburton, which includes a mixed cropping farm and two dairy farms within an integrated system. Our farming operation is around 1,400 hectares. My views are closely aligned with those of Federated Farmers, due to my personal farming background.

Anna Gillespie: Qualifications and Experience

7. My name is Anna Michelle Gillespie. I am the Provincial President of Otago Federated Farmers. I have been a member of the Otago Executive for 10 years.

I hold a Bachelor of Commerce in Agriculture and a Master of Applied Science from Lincoln University. I chaired my local Manuherekia Catchment Group for seven years and co-chaired the MfE-funded Thomsons catchment project and Waiora Manuherekia.

8. My husband and I own and run a 400-hectare farm finishing beef and dairy grazing just out of Omakau. We were Otago's Supreme Winners in the Ballance Farm Environment Awards in 2020. The Awards champion sustainable farming and growing through a programme which sees one Regional Supreme Winner selected from each of the 11 regions involved.
9. In the same year, our farming operation won the Ballance Agri-Nutrients Soil Management Award along with the WaterForce Wise with Water Award. Our work has been recognised for preventing negative environmental impacts with improvements including the establishment of multiple wetlands as well as an onsite nursery eco-sourcing all seed and growing native plants for riparian planting on farm. In 2020, we were also finalists in the Zimmatic Trailblazer Sustainable Irrigation Awards.

Documents read

10. In the preparation of this statement of evidence, we have read the following documents:
 - (a) Federated Farmers original submission and further submission;
 - (b) the s32 Evaluation Report for the Variation dated October 2024 (**the s32 Report**);
 - (c) the notified landscape schedules and the proposed Preamble to Schedule 21.23;
 - (d) the relevant parts of the QLDC Proposed District Plan (**PDP**);
 - (e) the relevant parts of the Otago Regional Policy Statement 2021, operative from 9 July 2026 (**ORPS**);
 - (f) the National Policy Statement for Highly Productive Land (**NPS-HPL**);
 - (g) the s42A Report of Ms Emily Frew dated 29 May 2026 and its appendices (**the s42A Report**);
 - (h) the evidence in chief (**EIC**) of Ms Bridget Gilbert dated 29 May 2026;
 - (i) the EIC of Mr Ben Espie, Mr Dan Curley, Mr Scott Edgar, Ms Morgan Shepherd, and Mr Steve Skelton filed on behalf of other submitters;

- (j) the Joint Witness Statement of the landscape and planning experts arising from conferencing on 6, 8 and 9 July 2026, dated 14 July 2026 (**the JWS**), together with the facilitator's report and the marked-up schedules attached to it; and
- (k) the rebuttal evidence of Ms Frew (planning) and Ms Gilbert (landscape), both dated 12 August 2026, together with the Rebuttal Version of the UCLS and the Rebuttal Submissions Recommendation Table appended to Ms Frew's rebuttal.

BACKGROUND

About Federated Farmers

- 11. Federated Farmers is a voluntary membership-based organisation that represents farmers and other rural businesses. Federated Farmers has a long and proud history of representing farmers and as such has a keen interest in the Queenstown Lakes District Plan.
- 12. Federated Farmers is a federation of 24 provincial bodies, each structured as its own incorporated society. There are six industry groups being dairy, meat and wool, arable, goats, high country, and rural butchers. Federated Farmers' national body is governed by a National Council (which comprises a representative from each province and industry group) with day-to-day governance delegated to a National Board.

Otago Federated Farmers

- 13. Otago Federated Farmers has been an active participant in the Variation. The Variation proposes to introduce one Priority Area (**PA**) schedule for the Mata-au Clutha River into Schedule 21.22 and twelve non-PA Rural Character Landscape (**RCL**) schedules into Schedule 21.23 of Chapter 21 (Rural Zone) of the PDP.
- 14. Our original submission and further submission sought changes to the non-PA RCL Schedules. These included modifications to recognise the role of farming, clarity in implementation, flexibility for changing farming practices, and the correction of deficiencies in the s32 evaluation and the consultation process.
- 15. The submission also expressed concern about the effect of the schedules on farming, on rural communities, and on the ability of the farming sector to adapt to future change.

16. The s42A report addresses our submission under Themes 2, 3, 5, 6 and 7. Ms Frew recommends that one of our submission points be accepted and that the balance be rejected.
17. The point accepted is OS41.8. Ms Frew agrees that the notified Preamble 21.23 could more clearly express the reasons for the difference between PA and non-PA terminology and recommends amendments to the Preamble accordingly.¹

GENERAL COMMENTS

Scope of evidence and relationship to the Joint Witness Statement

18. Expert conferencing between the landscape and planning experts took place on 6, 8 and 9 July 2026. Otago Federated Farmers did not participate in that conference. However, our evidence has been written considering the JWS.
19. We highlight the following matters recorded as agreed in the JWS:
 - (a) unlike the PA schedules, there is no direction in the strategic objectives and policies of the PDP to schedule non-PA areas;²
 - (b) there is no scope within the Variation to alter the objectives and policies to include such a direction;³
 - (c) while the schedules would assist in the administration of the PDP, there is no agreement as to how effective or efficient that assistance would be;⁴ and
 - (d) the Council planner, Ms Emily Frew, records that site-specific assessments are still likely to be required for specific proposals.⁵

Summary of position

20. Our position can be summarised as:
 - (a) The Mata-au Clutha River is an Outstanding Natural Feature (**ONF**) identified through the Environment Court's Topic 2 process. We did not submit on, and do not oppose, Schedule 21.22.25.
 - (b) The most appropriate outcome is Option 2 as identified in the Council's s32 evaluation: schedule the Mata-au Clutha River PA and make the

¹ Section 42A Report, para 10.12(a).

² JWS, para 10.

³ Ibid at para 17.

⁴ Ibid at para 29.

⁵ JWS, para 35.

associated amendments, but do not introduce the twelve non-PA RCL schedules.

- (c) We consider that the contrast between the JWS findings and the conclusions of the s32 Evaluation provides a sound basis for reconsidering whether the Variation is the most effective and efficient way to address the perceived issue:
- i) A key risk identified in the s32 Evaluation for Option 2 is that *“the policy direction in the PDP for RCLs would not be achieved.”*⁶ However, this appears to be inconsistent with the JWS findings which support the need for site-specific assessment of landscape values rather than the application of a blanket scheduling approach. This calls into question the basis for concluding that Option 2 would fail to achieve the relevant policy direction.
 - ii) The s32 Evaluation states that the economic cost of Option 2 *“...could increase the cost to applicants for resource consents or plan changes as a case-by-case assessment ...would need to be undertaken”*⁷, whereas for Option 3 *“There are not considered to be any economic costs...”* However, the JWS confirms that site-specific assessments will be necessary regardless of whether the non-PA RCL schedules are introduced. The distinction drawn between the economic costs of Options 2 and 3 appears to warrant reconsideration.
 - iii) The s32 Evaluation concludes that Option 2, *“is not an efficient or effective way to achieve the objectives of the Proposal”*⁸, while Option 3 *“is more efficient and effective than Option 2...”*⁹ However, the JWS records a difference in expert opinion on this issue. In light of that difference, and the JWS findings concerning the need for site-specific assessment, the conclusion that Option 3 is necessarily the more efficient and effective approach is not established.
- (d) Taken together, these matters indicate that the assumptions underpinning the s32 Evaluation’s preference for Option 3 should be reconsidered. The JWS provides an opportunity to step back and

⁶ Section 32 Evaluation, Table 5, Option 2.

⁷ Ibid.

⁸ Ibid, para 12.6.

⁹ Section 32 Evaluation, para 12.8.

reconsider whether introducing the twelve non-PA RCL schedules is in fact the most appropriate, effective, and efficient response, particularly when Option 2 would address the Mata-au Clutha River PA without imposing the additional scheduling framework proposed by the Variation.

- (e) If the non-PA RCL schedules proceed, the landscape capacity ratings should not be retained in their present form. For earthworks, farm buildings and intensive agriculture, the ratings are applied to the activities the schedules themselves identify as creating the character to be maintained. Across the rated activities generally, they do not vary sufficiently between landscapes to assist a decision-maker to distinguish one location from another.
- (f) Our preference is that those ratings be deleted. If they are retained in any form, they should be redrafted so that farming is recognised as an anticipated and continuing use of the land and a contributor to landscape values rather than a pressure upon it. Preamble 21.23 should be amended to state expressly what weight the ratings carry.

The statutory and strategic policy framework

- 21. The PA schedules have their origin in directions of the Environment Court. Through the Topic 2 proceedings the Court identified the district's ONF and ONL and directed that schedules of values be prepared for the PAs. Those directions were confined to the PAs.¹⁰
- 22. The RCL classification was confirmed through the same process, with the Court holding that an RCL is a s7(c) amenity landscape under the Act. The decision to extend the schedule approach to those RCL areas was a discretionary choice made by the Council.
- 23. Where the Plan already provides a method for identifying landscape character and visual amenity values outside the PAs, and where the schedules are expressly said not to replace that site-specific assessment, the additional benefit is limited which was the conclusion reached by Mr Curley.¹¹

¹⁰ Decision 2.2.

¹¹ EIC of Mr Curley, para 6.16 and 9.6.

Higher order policy direction

National Policy Statement for Highly Productive Land

24. The s32 report records that transitional mapping has identified highly productive land within the Upper Clutha.¹² The report then dismisses the NPS-HPL, on the basis that the Variation introduces no new rules or standards and therefore creates no inconsistency.¹³ It also states that the variation introduces no provisions which compromise the purpose of the NPS-HPL.¹⁴
25. The s32 report does not state how much land is involved. We have compared the transitional highly productive land mapping against the twelve schedule areas. Of the 10,681 hectares to which the schedules would apply, 3,719 hectares, or 34.8 per cent, are mapped as highly productive land.¹⁵ Over a third of the land subject to the proposed landscape capacity ratings is land the NPS-HPL directs be protected for use in land-based primary production.
26. In our view the treatment in the s32 report is inadequate. The activities subject to landscape capacity ratings include earthworks, farm buildings, and intensive agriculture. Those are among the activities through which land-based primary production is carried out on that land.
27. A framework which rates the landscape's capacity to accommodate such activities, and which is engaged whenever a consent is required, has the potential to constrain activities the NPS-HPL itself recognises as supporting land-based primary production. Applying capacity ratings uniformly across land of which more than a third is highly productive risks working against, rather than giving effect to, the objective of protecting that land for use in land-based primary production.
28. The s42A report does not address the NPS-HPL. However, it does address the National Policy Statement (**NPS**) for Electricity Networks and the NPS for Renewable Energy. These instruments are directly relevant to infrastructure, yet the instrument that is directly relevant to land-based primary production is not addressed. We consider its omission from the s42A assessment to be significant.

¹² Section 32 Evaluation, para 6.4.

¹³ Ibid at para 6.5.

¹⁴ Ibid at para 6.6.

¹⁵ GIS modelling conducted by Federated Farmers' Senior GIS Specialist from data obtained from Federated Farmers, QLDC and New Zealand Land Resource Inventory.

The treatment of farming within the schedules

29. The rural character these schedules seek to maintain is not in a natural or residual condition; it is man-made. It is the product of more than 150 years of farming. The open pastoral character, fence lines, shelterbelts, irrigated pasture, and modified grasslands that the schedules describe as valued attributes exist because of ongoing farming activity, and they will persist only for so long as farming remains viable.
30. Each schedule identifies pastoral and productive land use as a land use pattern and feature contributing to the character of the area. The schedules then apply a landscape capacity rating to those same activities.
31. There is an internal inconsistency in a document which identifies an activity as constituting the valued character of a landscape and, in the same document, assesses that landscape's capacity to accommodate further activity. The ratings treat farming as a pressure on the landscape when the description identifies farming as what created it.
32. The s42A report does not engage with that point. Ms Frew's answer is that farming activities are a form of land use and development, that Part 2 of the Act requires ONF and ONL to be protected from inappropriate subdivision, use and development, that particular regard must be had to maintaining and enhancing amenity values, and that the schedules help to ensure farming activities can occur in a manner consistent with Part 2.¹⁶ That answer treats farming as an input to be assessed. It does not address the proposition that in these twelve landscapes farming is also the source of the character being assessed.
33. Mr Espie states that Schedule 21.23.13 describes large-scale farm buildings as part of the existing character while framing the capacity rating around modestly scaled buildings, leading to an inconsistency where only "some capacity" is given for farm buildings within a landscape that contains the largest expanse of dairy farming in the district.¹⁷
34. Mr Skelton makes a similar point in relation to the Poplar Beach terrace, observing an inconsistency between the descriptive sections of a schedule,

¹⁶ Section 42 Report, para 9.15.

¹⁷ EIC of Mr Espie, paras 65 and 66.

which recognise rural living and farming, and capacity ratings which apply a largely uniform and restrictive assessment.¹⁸

35. A regulatory approach that treats reasonably anticipated farming activities as pressures to be rated and assessed inverts the relationship between farmers and the landscape. Farmers are the principal stewards of the Upper Clutha's rural landscapes and have the strongest interest in sustaining the rural character. If the schedules make routine farming activity slower and more expensive, a potential long-term outcome is land use change away from pastoral farming, which would erode the very character the schedules are intended to maintain.

Comparison of landscape capacity ratings across the twelve schedules

36. We have compared the landscape capacity rating assigned to each activity across all twelve non-PA RCL schedules [refer to **Table 1** in the Appendix]. The s32 report sets out the scale used for landscape capacity: some, limited, very limited, extremely limited, and extremely limited or no landscape capacity. Every band on that scale expresses a degree of limitation, and the most that any landscape can be found to have is some capacity.
37. The scale provides no means of recording that an activity is anticipated in a landscape, or that it contributes to the character the schedule describes. Where a schedule identifies farming as creating the valued character of an area, the highest rating available for that activity remains an expression of the landscape's capacity to absorb it.
38. Ms Frew records that two of the twelve schedules, Sheepskin Creek and Quartz Creek and Maungawera, were not subject to expert evidence received from submitters and were not discussed at expert witness conferencing. She records that Riverbank Road also received no expert evidence from submitters, but that Ms Gilbert has recommended changes to it for consistency with Studholme Road. The content of those two schedules has therefore been considered only by the Council's own witnesses. Federated Farmers has an interest across all twelve areas.
39. The uniformity of the ratings suggests a general view about the acceptability of farming activities in rural landscapes, rather than an assessment of the capacity of any particular landscape to accommodate them.

¹⁸ EIC of Mr Skelton, paras 60 and 100.

40. Six of the rated activities carry an identical rating in every one of the twelve schedules: urban expansions, earthworks, farm buildings, forestry, utilities and regionally significant infrastructure, and renewable energy generation. Two more vary only between very limited and limited, being transport infrastructure and rural living. The activities that differentiate consistently between landscapes are commercial recreational activities and visitor accommodation and tourism related activities.
41. For the activities of most relevance to farming there is little or no differentiation. Earthworks are rated limited and farm buildings some in all twelve landscapes, without variation. Intensive agriculture is rated some in eleven of the twelve. Where a landscape capacity rating is the same in every schedule it conveys no landscape-specific information, and it cannot assist a decision-maker to distinguish one location from another.
42. That position has not improved as the Variation has progressed. At notification, urban expansions was the one activity whose rating differed materially between landscapes, being rated some landscape capacity in three schedules and extremely limited or no landscape capacity in the remaining nine.
43. The Rebuttal Version applies extremely limited or no landscape capacity in all twelve. After the s42A report, expert conferencing and a round of rebuttal, the number of activities carrying an identical rating across every landscape has increased rather than reduced. The uniformity of these ratings suggests a general view about the acceptability of activities in rural landscapes, rather than an assessment of the capacity of any particular landscape to accommodate them.
44. Mr Edgar adopts Mr Espie's position that dividing an RCL into smaller schedule areas and defining capacity at that scale may compartmentalise the landscape and produce lower ratings than would be arrived at through assessment at a proper landscape scale.¹⁹ We agree with this view, given the minimal difference between capacity assessments of earthworks, farm buildings, intensive agriculture, and rural living across the schedules.

Practical consequences for farmers

45. The threshold at which the schedules become engaged for ordinary farming activity is low. For example, under PDP Rule 21.8.1, the construction,

¹⁹ EIC of Mr Edgar, paragraphs 29 & 30.

replacement or extension of a farm building is permitted subject to standards which include:

- (a) Rule 21.8.1.1, that the landholding be greater than 100 hectares;
- (b) Rule 21.8.1.2, that the density of all buildings on the landholding, inclusive of the proposed building, not exceed one farm building per 50 hectares;
- (c) Rule 21.8.1.6, that within a RCL the farm building does not exceed 5 metres in height and 300m² in ground floor area; and
- (d) Rule 21.8.1.7, that the farm building does not protrude onto a skyline or above a terrace edge when viewed from adjoining sites or formed roads within 2 kilometres.

46. A breach of any of those standards makes the activity restricted discretionary. These are not exceptional thresholds. A ground floor area of 300m² is smaller than a modern implement shed and well below the footprint of a wintering barn, a covered feed pad or a woolshed. A height limit of 5 metres is below the ridge height of most of these structures. The density cap means that a 200-hectare property is limited to four farm buildings in total, so that a property with a woolshed, an implement shed, a hay barn and a covered yard has reached the permitted cap and the next building of any size requires consent.
47. In making a consent application, a farmer must then assess their proposal against the schedule's attributes, values and capacity ratings. In most cases this will still require a landscape assessment by a suitably qualified expert. For an ordinary farm building that adds cost and delay disproportionate to the scale and effect of the activity.
48. The ambiguity of the schedules' status compounds this. Ms Frew describes the capacity ratings as high level guidance, yet nothing in the plan framework tells a consent officer or a commissioner what weight guidance carries under s104 of the Act. One decision-maker may treat a rating of limited as near-determinative; another may set it aside.
49. Mr Skelton records that, based on his experience with the existing PA schedules, they are often afforded greater weight than intended by the Preamble and are frequently relied upon as policy or assessment criteria rather than as a high-level assessment tool.²⁰ He further records that subjective terms

²⁰ JWS, para 24.

such as "low key" and "modestly scaled", and the capacity ratings themselves, can in practice disproportionately influence consent outcomes.

50. Mr Curley, Mr Edgar, and Ms Shepherd all concur that the potential for future plan changes and ongoing litigation to continually update the schedules may deem their inclusion within the existing District Plan as a less efficient mechanism than relying on the existing Plan framework for non-PA RCL areas.²¹
51. Ms Frew records that the Council will run an introductory session later this year for landscape architects recently appointed to its Planning and Development Consultant Panel, on applying the Preamble 21.23 guidance. We accept that is a sensible step. It also indicates that the Schedules and Preamble are not self-explanatory to the professionals who will apply them. A farmer reading a Schedule before commissioning a landscape assessment will not have the benefit of that session.
52. Farmers are entitled to a plan that provides reasonable certainty about how their applications will be assessed. On the evidence of the planning and landscape experts, the schedules as drafted do not provide that. The Variation has the potential to significantly increase costs for individual landscape assessments for resource consents for earthworks, farm buildings, intensive agriculture, and rural living given their ambiguity, and for ratepayers due to the schedules needing to be continually updated to account for inevitable changes in landscape capacity.

Potential cost increases for farmers

53. The s32 report identifies that the scale and significance assessment has had regard to whether the proposed provisions impose increased costs or restrictions on individuals, communities or businesses.²² Table 6, which evaluates the preferred option, then records that there are not considered to be any economic costs of the implementation of the proposal, and that the certainty provided by the schedules will reduce the cost to applicants. Tables 4 and 5, which evaluate the alternatives, treat cost to applicants as a reason against proceeding with those alternative options. The consideration of cost within the s32 report is therefore limited, and potentially incomplete.

²¹ Ibid at para 25.

²² Section 32 Evaluation, para 7.1(e).

54. The s42A report applies a similar approach towards cost. Ms Frew records that the values and attributes in the schedules could help reduce costs by providing a starting point for landscape assessments, and that without schedules the cost of assessing from first principles may transfer to applicants.²³ She records that a high-level schedule could reduce inconsistency between assessments and could therefore reduce costs.²⁴ Across the s32 report and the s42A report the Council has identified potential cost reductions and no cost increases.
55. Ms Frew's reasoning assumes the schedule does work an applicant would otherwise pay for. This assumption is not consistent with the rest of the s42A report. Ms Frew states that a finer-grain proposal-specific assessment of landscape attributes and values will typically be required,²⁵ and that because capacity, attributes and values change over time a more up to date assessment must be made at resource consent stage.²⁶ The schedule does not replace the need for an independent assessment by consent applicants. It is a further document the assessment must address. A document read in addition to an assessment that must still be carried out is more likely to *add* to the cost of an application than to reduce it.

RELIEF SOUGHT

56. Our relief within this evidence is framed as recommendations open to the Panel, with our preference recorded.
57. **Primary relief** – Federated Farmers seeks that the Panel recommend Option 2 as set out in the Council's s32 evaluation report. That is, Schedule 21.22.25 Mata-au Clutha River is included in Schedule 21.22 together with the associated amendment to SP 3.3.36 and the amendment to Preamble 21.23, and that the twelve non-Priority Area Rural Character Landscape schedules 21.23.6 to 21.23.17 not be included in the Plan.
58. **Secondary relief** – Alternatively, if the Panel is not inclined to grant the primary relief sought, Federated Farmers seeks that, if non-PA RCL schedules are to be included in the Plan, the landscape capacity section of each schedule be amended to remove the ratings for the activities that are reasonably anticipated in the Rural Zone, namely earthworks, farm buildings, intensive agriculture, and rural living.

²³ Section 42A Report, para 14.4.

²⁴ Ibid at para 14.5.

²⁵ Ibid at para 12.8.

²⁶ Ibid at para 13.17.

CONCLUSION

59. Federated Farmers' interest in this hearing is ensuring farming can continue as a viable activity across the twelve RCL schedule areas. In our view, these schedules will increase cost for farmers by adding an additional framework for consideration when applying for consents. While the intention may be to reduce the need for a landscape architect to conduct in-depth assessment, they are likely to do the opposite resulting in significantly increased costs for activities that create the very character of rural landscapes.
60. The character the schedules describe exists because of what our members do, and viable farming will persist only for so long as they can continue to do it economically. Plan provisions which add cost, delay, and uncertainty to routine farming activity work against that outcome, and in doing so work against the maintenance of the rural character the schedules are intended to protect.
61. We ask the Panel to consider the processes to date and the opportunity now available to ensure that the approach taken to manage these landscapes is proportionate to what is required and what the Plan already provides.
62. Federated Farmers thanks the Hearing Panel for the opportunity to present this evidence statement.



Rachel Thomas
Senior Policy Advisor
Federated Farmers of NZ



Anna Gillespie
Provincial President
Otago Federated Farmers

APPENDIX

Figure 1 – Upper Clutha RCL Area and highly productive land

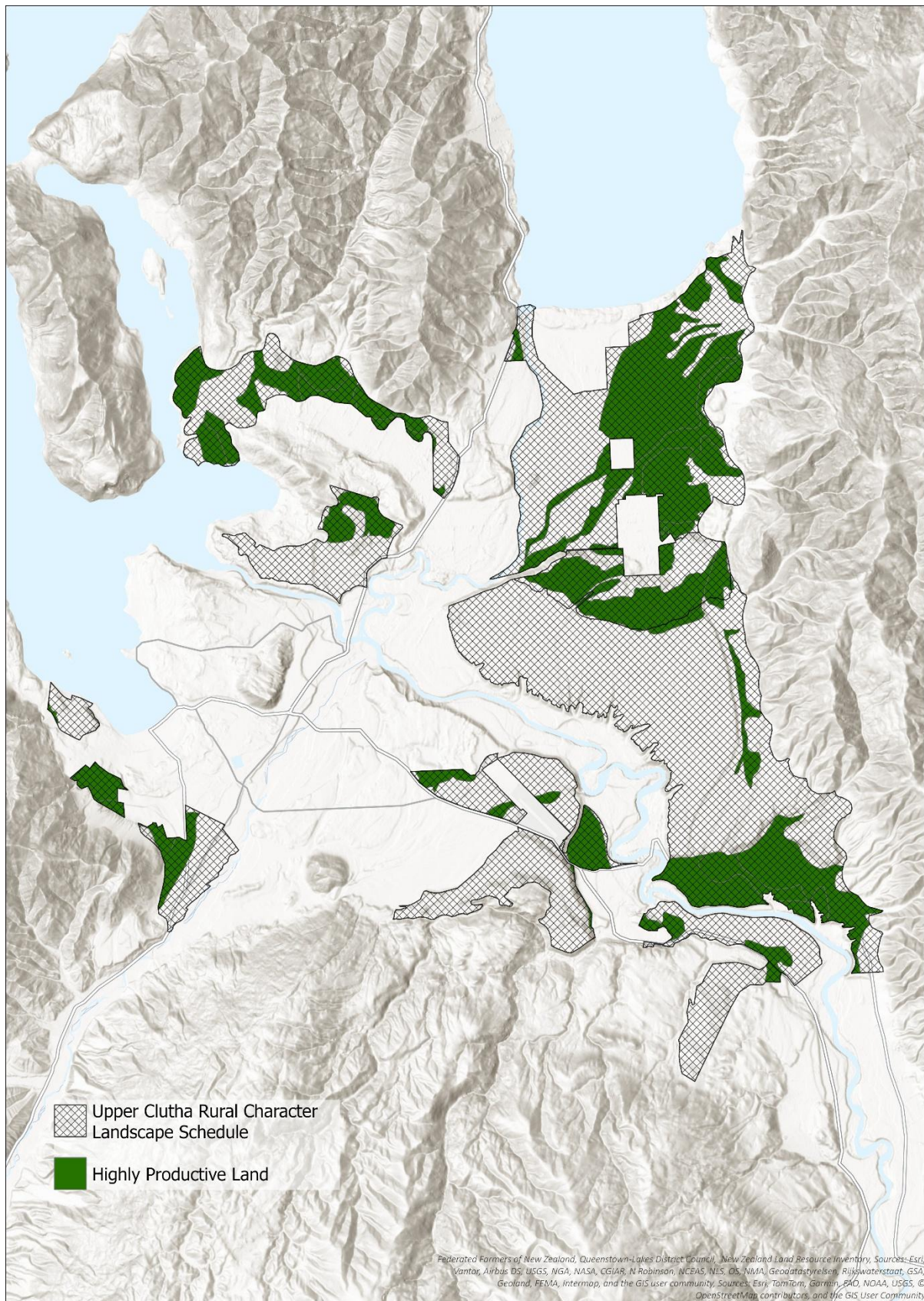


Table 1-Comparison of capacity ratings by schedules*

Capacity ratings shown in red reflect the activities Federated Farmers seeks removal of from the Schedules under our secondary relief. The ratings are almost identical across all schedules.

	East of Wānaka– Mount Aspiring Road	Studholme Road	Riverbank Road	Wānaka Airport Environs	Criffel/Pisa Range Foothills	East of Luggate	Sheepskin Creek	Kane Rd & Luggate- Tarras Highway	Hāwea Moraine	Hāwea Basin	Crosshill	Quartz Creek & Maungawera
Intensive agriculture	Extremely limited	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some
Earthworks	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited
Farm buildings	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some
Rural living	Very limited	Limited	Limited	Very limited	Very limited	Very limited	Very limited	Very limited	Very limited	Very limited	Limited	Very limited
Commercial recreational activities	Very limited	Limited	Limited	Some	Some	Limited	Some	Some	Some	Some	Very limited	Very limited
Visitor accommodation and tourism related activities	Limited	Very limited	Some	Limited	Limited	Some	Limited	Some	Some/ very limited	Some	Limited	Limited
Urban expansions	Extremely limited or no capacity	Extremely limited or no capacity	Extremely limited or no capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity	Extremely limited or no landscape capacity

	East of Wānaka– Mount Aspiring Road	Studholme Road	Riverbank Road	Wānaka Airport Environs	Criffel/Pisa Range Foothills	East of Luggate	Sheepskin Creek	Kane Rd & Luggate- Tarras Highway	Hāwea Moraine	Hāwea Basin	Crosshill	Quartz Creek & Maungawera
Mineral extraction	Very limited	Very limited	Limited	Very limited	Very limited	Limited	Very limited	Some	Limited	Limited	Very limited	Very limited
Transport infrastructure	Very limited	Very limited	Very limited	Very limited	Very limited	Very limited	Very limited	Limited	Very limited	Limited	Very limited	Very limited
Utilities and regionally significant infrastructure	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited
Renewable energy generation	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some	Some
Forestry	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited	Limited
Rural Industrial Activity	-	-	-	-	Some	-	-	-	-	-	-	-

*Note – The table incorporates proposed amendments from recent rebuttal evidence and matters agreed upon within the JWS.