

**Queenstown Lakes District Proposed District Plan**

**Section 32 Evaluation**

**Variation to Proposed District Plan**

**For:**

**Variation to introduce into Chapter 21 schedules of landscape values for 29 Priority Area  
landscape**

**Report dated: 30 June 2022**

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## 1. INTRODUCTION

1.1. This report fulfils the requirements of Section 32 of the Act, which requires the objective(s) of proposals to be examined for their appropriateness in achieving the purpose of the Act, and the policies and methods of those proposals to be examined for their costs, benefits, efficiency, effectiveness and risk in achieving the objectives.

1.2. This proposal is a variation to Chapter 21 (Rural Zone) of the Proposed District Plan (PDP), to introduce schedules setting out landscape values for 29 Priority Area landscapes within the District. The purpose of the variation is to implement Policy 3.3.42 of the PDP, which is as follows:

*3.3.42 The Council shall notify a proposed plan change to the District Plan by 30 June 2022 to implement SPs 3.3.36, 3.3.37, 3.3.39 and 3.3.40.*

1.3. To elaborate further, Policy SP 3.3.36 identifies 24 Priority Area landscapes within Outstanding Natural Features and Outstanding Natural Landscapes (ONLs and ONFs, or combined ONFLs), and Policy SP 3.3.37 requires, for each of these 24 Priority Areas, a schedule to describe:

- a. The landscape attributes (physical, sensory and associative);
- b. The landscape values; and
- c. The related landscape capacity.

1.4. Similarly, Policy SP 3.3.39 identifies five Priority Area landscapes within the Upper Clutha Rural Character Landscapes (RCLs), and Policy 3.3.40 requires, for each of these five Priority Areas, a schedule to describe:

- a. The landscape attributes (physical, sensory and associative);
- b. The landscape character and visual amenity values; and
- c. The related landscape capacity.

1.5. The scope of this proposal is therefore limited to the content of the schedules, including the way the schedules describe the landscape attributes, landscape values (ONFLs) or landscape character and visual amenity values (RCLs), and the related landscape capacity of each of the 29 Priority Area landscapes.

- 1.6. This variation does not change any objectives or policies in the PDP or seek to introduce new objectives or policies. It does not change any aspect of the identification or mapping of the Priority Areas themselves, nor does it seek to introduce new Priority Areas or delete identified Priority Areas. Identification and mapping of the Priority Areas has already occurred and is already set out in Chapter 3 of the PDP and the web mapping application.
- 1.7. The best practice landscape methodology used to prepare the schedules is not within scope of this proposal, as the methodology is prescribed in Chapter 3 of the PDP, including in Policies SP 3.3.38, SP 3.3.41, and SP 3.3.43.
- 1.8. Council is separately undertaking an assessment of the remainder of the Upper Clutha RCL, in order to create schedules that record the values of this wider landscape. Resourcing restrictions mean it has not been possible to notify these additional schedules with the Priority Area schedules that are the subject of this variation. Further time is required to ensure the identification and description of the landscape values of the remainder of the Upper Clutha RCL is undertaken in a robust way. However, Council used the consultation process to also seek feedback on the values people hold for the remainder of the Upper Clutha RCL. This feedback will be incorporated into the separate schedule being prepared for that landscape.

## **2. STRUCTURE OF THE REPORT**

- 2.1. This report provides an analysis of the policy response proposed by the variation as required by s32 of the RMA, using the following sections:
  - a) A description of **the Proposal**.
  - b) **Background** to the proposal.
  - c) **Consultation** undertaken, including engagement with iwi authorities on the proposal.
  - d) An overview of the applicable **Statutory Policy Context**.
  - e) A description of the **Resource Management Issue** being addressed by the proposal.
  - f) An assessment of the **scale and significance** of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.
  - g) An **Evaluation** against s32 of the RMA, including
    - Whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (Section 32(1)(a)).

- Whether the provisions (policies and methods) are the most appropriate way to achieve the objectives of the proposal (Section 32(1)(b)), including:
  - (i) identifying other reasonably practicable options for achieving the objectives
  - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of risk of acting or not acting, and
  - (iii) summarising the reasons for deciding on the provisions.

### 3. THE PROPOSAL

3.1. The purpose of this proposal is to implement the requirements of Chapter 3<sup>1</sup> of the PDP that direct landscape schedules be included in Chapter 21 of the PDP for certain landscapes that are identified as Priority Areas.

3.2. Specifically, the proposal introduces two schedules to Chapter 21, as follows:

- **Schedule 21.22** Outstanding Natural Features and Outstanding Natural Landscapes – see Appendix A of this report.
- **Schedule 21.23** Upper Clutha Rural Character Landscapes - see Appendix B of this report.

3.3. Policy SP 3.3.36 identifies the ONFL Priority Area landscapes to be included in Schedule 21.22, as shown in Table 1 below, and these areas are identified on the District Plan web mapping application.

**Table 1: ONFL Priority Areas (SP 3.3.36)**

Classification	Area	Parts of:
Outstanding Natural Features (ONF)	Queenstown	Peninsula Hill Ferry Hill Shotover River Morven Hill Lake Hayes Slope Hill Feehly Hill Arrow River Kawarau River

<sup>1</sup> Appendix D sets out the relevant Chapter 3 policies

	Upper Clutha	Mt Barker Mt Iron
Outstanding Natural Landscapes (ONL)	Queenstown	West Wakatipu Basin Queenstown Bay and environs Northern Remarkables Central Wakatipu Basin Coronet area East Wakatipu Basin and Crown Terrace area Victoria Flats
	Upper Clutha	Cardrona Valley Mount Alpha Roys Bay West Wānaka Dublin Bay Hāwea South and North Grandview Lake McKay Station and environs

3.4. Policy SP 3.3.39 identifies the Upper Clutha RCL Priority Area landscapes to be included in Schedule 21.23, as shown in Table 2 below, and these areas are identified on the District Plan web mapping application.

**Table 2: Upper Clutha RCL Priority Areas (SP 3.3.39)**

<b>Classification</b>	<b>Area</b>	<b>Name of Priority Area</b>
Rural Character Landscapes (RCL)	Upper Clutha	Cardrona River/ Mt Barker Road Halliday Road/Corbridge West of Hāwea River Church Road/Shortcut Road Maungawera Valley

#### **Format of the landscape schedules**

- 3.5. For each Priority Area, the schedules follow a similar format in order to meet the requirements of the policy direction in Chapter 3. In accordance with Policy SP 3.3.38, for each Priority Area in the ONFL the schedules set out the following information:
- a. Identification and description of the key physical, sensory and associative attributes that contribute to the values of the ONFL that are to be protected;
  - b. Rating of the attributes identified in (a), using a seven-point scale rating from Very Low to Very High
  - c. The related landscape capacity for a number of subdivision, use, and development activities identified and any considered relevant to that area.

- 3.6. The same approach and format has been used for the RCL. However, Policy 3.3.40 differs from Policy 3.3.37 for ONF or ONL as it requires the description of landscape character and visual amenity values, not of landscape values.
- 3.7. The three concepts defined at 3.5(a) to (c) are expressed through the ‘three dimensional’ structure of the schedules, and implement the VIF and principles set out for landscape in Te Tangi a te Manu (TTatM). This document sets out the landscape assessment methodology adopted by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA TPO) for assessment of landscape values. A full explanation of the approach taken is set out in the Methodology Statement (Appendix C).

#### **Effect of including the landscape schedules in the PDP**

- 3.8. Including the schedules within Chapter 21 of the PDP will provide certainty in policy direction for landscape management within the PDP. Objective SO 3.2.5.2 directs that the landscape values of ONFL are protected, and Objective SO 3.2.5.5 directs that for RCLs, landscape character is maintained, and visual amenity values are maintained or enhanced.
- 3.9. The schedules provide clarity on what is being sought to be protected, maintained, or enhanced within each Priority Areas landscape by identifying landscape values, landscape character, and visual amenity values. This provides more detail to support the policy framework. The schedules provide certainty that the landscape outcomes set by Chapter 3 of the PDP will be achieved.
- 3.10. The schedules are not linked to a particular rule/s and they will not introduce any new type of resource consent. The consenting framework for the rural zones remains the same. Instead, the schedules will assist with the assessment of land use and subdivision resource consent applications in the rural zones. They will clearly identify the values to be protected, maintained and/or enhanced by a proposed development that falls within the Priority Areas.
- 3.11. The schedules intend to provide better management of cumulative effects on landscape values, via the concept of landscape capacity. Each schedule identifies the capacity of the particular Priority Area landscape to absorb subdivision and development without compromising the identified values. While a landscape has capacity to absorb development without compromising landscape values, development can potentially proceed without creating cumulative effects.

However, where a landscape has no, very limited, or some capacity for development, the schedules alert plan users to the fact that the landscape is nearing capacity, meaning there is a real threat of cumulative effects from further subdivision and development. The schedules identify the capacity of each landscape for 12 different categories of development, as indicated by Policies SP 3.3.38 and SP 3.3.41 of the PDP.

- 3.12. The schedules will be relevant for all resource consent applications located within the 29 Priority Area landscapes, where the objectives and policies of Chapter 3 direct that the schedules apply to that application.
- 3.13. The landscape schedules for the Priority Areas standalone within the PDP and do not change or alter any other overlays, zones or mapping notations. For example, the landscape schedules do not change how wāhi tūpuna are applied through the PDP, and they have no impact on Statutory Acknowledgement Areas.

#### **4. BACKGROUND**

##### **Why landscape schedules for Priority Area landscapes?**

- 4.1. This variation to include schedules of the landscape values of the Priority Area landscapes in Chapter 21 of the PDP is a result of an Environment Court decision. That decision was the result of appeals on Stage 1 of the District Plan Review relating to the management of landscapes in the Rural Zone.
- 4.2. In summary, the Environment Court decided that requiring the protection of the landscape values of ONFLs, and the maintenance of landscape character and the maintenance or enhancement of visual amenity values of RCLs, without specifying what those landscape values, character or visual amenity values were, did not provide enough certainty to ensure the policy direction was achieved. The Court therefore directed that the landscape values of ONFLs, and the landscape character and visual amenity values of RCLs, should be identified and included in schedules in the PDP.
- 4.3. The Court acknowledged that it would be a significant undertaking to identify the values of all of the landscape because 97% of the District is classified as ONFL. Rather, the Court went through a process with the landscape architects and planners involved in the hearing and identified the 29 Priority Area landscapes to be included in the schedules first. A number of



criteria were considered, including areas where development pressure may be more likely, which may in turn result in cumulative effects on these landscapes.

#### **Methodology for preparing the landscape schedules**

- 4.4. As well as identifying the Priority Areas to be included in the landscape schedules, the Court prescribed the methodology to be followed to prepare the schedules. Again, this was a process the Court undertook with the landscape architects and planners involved in the hearing. The final methodology is referred to as the Values Identification Framework (VIF) and is set out in Chapter 3 of the PDP in Policies SP 3.3.36 to SP 3.3.41.
- 4.5. In addition to the VIF, the policies require best practice landscape assessment methodology be used for the identification of landscape values, landscape character, and visual amenity values. This proposal has adopted best practice landscape assessment methodology through the guidance of Te Tangi a Te Manu (TTatM).
- 4.6. Landscape capacity is the ability for subdivision, use or development to be absorbed in such a way that identified landscapes values are not compromised for ONF and ONL, or identified landscape character and visual amenity for RCL. TTatM does not provide guidance on assessing landscape capacity. For the landscape schedules, a scale of some capacity, limited capacity, very limited capacity and no capacity has been used. This is not inconsistent with the definition of landscape capacity within Chapter 3<sup>2</sup>.
- 4.7. The method used for the schedules is set out in the methodology statement included in Appendix C to this report. Section X specifically addresses the method used for landscape capacity that is specific to the schedules.
- 4.8. In summary, a team of three landscape architects were commissioned to prepare the landscape schedules. The VIF and best practice methodologies were applied, and public consultation (discussed in further detail below) was used to inform the content of the schedules. Mana whenua provided input on mana whenua values (discussed further below). Input was also provided by experts from other related specialities:

- Ecology

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<sup>2</sup> 3.1B.5b.

- Tourism and Recreation
- Archaeology and heritage
- Geomorphology

## 5. CONSULTATION

### Statutory body consultation

5.1. Clause 3(1)(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan. Council has engaged with iwi throughout this project. Engagement has included:

- Hui attended by Rūnaka, Aukaha, QLDC Policy team, and a member of the project Landscape Team
- Provided draft landscape schedules for comment and inclusion of values
- (online) meeting between Planners for Aukaha, Te Ao Marama Inc and QLDC Policy team

5.2. The schedules include statements of values from Manawhenua. As part of this it was noted that using the term Mana Whenua is preferred over Tangata Whenua and Rūnaka consider that mana whenua values should not be rated or ranked.

5.3. The rating of landscape values is problematic from a Manawhenua perspective where all aspects of the natural world are interconnected. Policy 3.3.38 and Policy 3.3.41 direct the rating of attributes. Therefore, ratings have been applied within the schedules. However, ratings have not been applied to the Mana whenua values.

5.4. It is noted that Ngāi Tahu ki Murihiku have contributed to the schedules through collaboration with Kāi Tahu Ki Otago. The principles and extent of their collaboration is set out in the statement below:

- Āpiti Hono Tātai Hono – Ngāi Tahu ki Murihiku Assessment Methodology
- (a) Ngāi Tahu ki Murihiku deem all landscape to be significant, given that in Te Ao Māori, whakapapa and whenua are intertwined. The question is not how significant is a landscape, but what is held within that landscape. To answer that question consideration is needed of whakapapa, mana, kawa, tikanga and mātauranga alongside identity,

connections, practices, history and future aspirations. These considerations are the context within which to determine what is appropriate for that landscape and to describe the relationships held with the whenua.

- (b) As part of identifying and describing what 'cultural landscape' is to Ngāi Tahu ki Murihiku - Āpiti Hono Tātai Hono was developed. This methodology curates an intrinsic assessment process, focusing on the interwoven relationship between Ira Atua and Ira Tangata and the continuum of time and whakapapa and authentically expresses the philosophies and paradigms of Ngāi Tahu ki Murihiku. Stage 1 of this assessment study which expresses the methodology was endorsed by Ngāi Tahu ki Murihiku and the Te Ao Marama board in January 2022.
- (c) This methodology does not support a lines on maps approach, and further work to investigate the best approach on how to prioritise and manage identified cultural values and relationships for landscape is to be undertaken.
- (d) Ngāi Tahu ki Murihiku contributed to the schedules by collaborating with Ngāi Tahu ki Otago to insert key references to values and relationships that are held across all landscape. This was in part to point to deeper, broader and more authentic expression of relationship that Ngāi Tahu ki Murihiku have expressed through the Āpiti Hono Tātai Hono methodology.

### **Community consultation**

- 5.5. Council carried out online consultation between 9 March and 3 April 2022. Feedback was sought on the values people associate with the 29 Priority Areas. In addition, feedback was sought on values associated with the remainder of the Upper Clutha RCL, to inform the separate process underway to identify and describe the values of that landscape. As the result of an error, feedback was also sought on two landscapes not identified as Priority Areas (Homestead Bay and Western Remarkables). The mapping has been corrected for these areas. The additional areas are not subject to this proposal. However, feedback on these areas can be included in any future work that may occur for landscape schedules for these areas.
- 5.6. A 'Let's Talk' page was set up seeking feedback and included a map of the Priority Areas. Letters were sent to landowners whose properties were within a Priority Area. Notices were placed in the Mountain Scene and Wānaka Sun, along with radio ads and facebook coverage seeking input.
- 5.7. A total of 196 responses were received.

5.8. Responses on values included (but not limited to):

- Scenery: including reference to paintings (i.e Arthurs Pt stamp), views of, views from, open spaces and the night sky
- Recreation: skiing, biking, walking, fishing, paddleboarding
- Family associations – time lived in the area, recreating with family in these areas
- Effect on senses - providing sense of wellbeing – i.e.a sense of serenity and calmness, remoteness
- Others – wildlife (Pukekekos on Slope Hill)

5.9. The values identified in the consultation were used by the landscape team to inform the content of the schedules. The feedback also included comments on issues other than values. Comments that went beyond values were greyed out as they are beyond the scope of the values identification purpose of the feedback.

5.10. The feedback summaries and responses to this from the Landscape Team are set out in Appendix C.

#### **Statutory body consultation**

5.11. Clause 3(1) also requires local authorities to consult with (a) the Minister for the Environment; and (b) those other Ministers of the Crown who may be affected by the policy statement or plan; and (c) local authorities who may also be affected; and (e) any customary marine title group in the area, that may be affected by changes made to the District Plan. No direct consultation has occurred with the relevant bodies as part of preparation of the proposal but will occur as required as part of notification of the proposal.

## **6. STATUTORY POLICY CONTEXT**

6.1. The relevant requirements of the RMA, the Local Government Act 2002, and the two iwi management plans that apply in the District have been given appropriate regard in the preparation of this proposal. There are no relevant National Policy Statements or National

Environmental Standards. The proposal relates to Outstanding Natural Features and Outstanding Natural Landscapes which are matters of national importance under s6(b) of the RMA. Further, the Rural Character landscapes need to be given regard under s7(c) of the RMA. However, the policy approach for these landscapes are not changing through the proposal and therefore remains consistent with the higher order documents that informed the policy approach, as set out in Chapter 3.

- 6.2. The relevant provisions of the Otago Regional Policy Statement (ORPS), both partially operative and proposed, have been considered in the preparation of this proposal. Chapter 3 of the PDP gives effect to these higher order document. The proposed Regional Policy Statement 2021 (pRPS 21) was notified 26 June 2021. The pRPS 21 sets out consideration of landscape using physical, sensory and associative attributes (APP9). The proposal is considered consistent with the approach set out.

#### **Iwi Management Plans**

- 6.3. There are two relevant iwi management plans in the district.

*Kāi Tahu ki Otago Natural Resource Management Plan 2005*

*Te Tangi a Tauria – The Cry of the People.* The preparation of this variation has had regard to these two documents. Further, the policy approach that has informed the objective of this proposal has been informed by these documents.

#### **Proposed District Plan**

- 6.4. The statutory policy document of most relevance to the proposal is the PDP. The following objectives and policies of the PDP are relevant and have been given due regard in the development of this proposal:

- a) Strategic Direction – Chapter 3
- b) Tangata Whenua - Chapter 5
- c) Landscape and Rural Character – Chapter 6

The relevant objectives and policies have been set out in Appendix D. For completeness, all these chapters of the District Plan cover both Volume A (reviewed land) and Volume B (unreviewed land), as set out in 1.1B of the Plan.

- 6.5. As set out above, Chapter 3 directs that landscape schedules be prepared for the Priority Areas using the VIF.
- 6.6. Manawhenua values are an aspect of these landscapes that need to be considered. The policy approach set out in Chapter 3 and 6 to engaging Manawhenua was considered through this project.
- 6.7. Chapter 6 details policy for landscape and rural character, including to set out where areas may have a specific policy approach (i.e. exceptions zones such as Gibbston Valley).
- 6.8. No change is proposed to policy as part of this proposal. The proposal has taken direction from the relevant policy of the PDP.

## **7. RESOURCE MANAGEMENT ISSUES**

- 7.1. This proposal addresses an issue identified by the Environment Court that it is difficult to protect the landscape values of ONFLs, and maintain the landscape character, and maintain or enhance visual amenity values of RCLs, without first identifying these values. Further, that it is more efficient and effective to identify these values at the district plan level, than to leave the identification to a case-by-case situation via individual resource consent applications.
- 7.2. The proposal also directly relates to Strategic Issue 4 in Chapter 3 of the PDP:

*Strategic Issue 4: Some resources of the District's natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District's economy.*

## **8. SCALE AND SIGNIFICANCE EVALUATION**

- 8.1. The level of detailed analysis undertaken for the evaluation of the proposed objectives and provisions has been determined by an assessment of the scale and significance of the

implementation of the proposed provisions. In making this assessment, regard has been had to the following, namely whether the proposed objectives and provisions:

- Result in a significant variance from the existing baseline in Chapter 3, 6 and 21 of the PDP
- Have effects on matters of national importance.
- Adversely affect those with specific interests.
- Involve effects that have been considered implicitly or explicitly by higher order documents.
- Impose increased costs or restrictions on individuals, communities or businesses.

8.2. The level of detail in this evaluation report corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal. In this case, the scale and significance is considered moderate.

8.3. The proposal relates to ONF and ONL which are matters of national importance under s6(b) of the RMA. Further the Rural Character landscapes need to be given regard under s7c of the RMA. However, the policy approach for these landscapes are not changing through the proposal and therefore remains consistent with the higher order documents that informed the policy approach. The proposal retains the policy direction set out in the plan.

8.4. A clear direction has been set for the implementation of the schedules. The protection or maintenance of landscape is recognised having potential for district wide effect. For example, the visitor economy may rely on the special landscapes of the district. The proposal may impact property owners, although this may be positive with the schedules providing greater clarity of what is intended through the policies that seek to protect or manage landscape values and character.

8.5. The evaluation has recognised the scale and significance of the proposal through the use of a team of experts to inform the landscape schedules, engaged with Manawhenua and the community. A best practice approach has been adopted, following the direction of the VIF.

## **9. EVALUATION OF PROPOSED OBJECTIVES**

- 9.1. Section 32(1)(a) requires an examination of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act. This variation does not propose any new objectives or changes to existing objectives. In this case, an examination of the extent to which the purpose of the proposal is the most appropriate way to achieve the purpose of the Act is required (s32(6)).
- 9.2. The purpose of this variation is to implement the requirements of Chapter 3 of the PDP that direct landscape schedules be included in Chapter 21 of the PDP for certain landscapes that are identified as Priority Areas. This is an appropriate way to achieve the sustainable management purpose of the Act because it will provide greater certainty that the policy direction in Chapter 3 of the PDP will result in the protection of the landscape values of ONFLs, which is a matter of national importance under s6 of the RMA. It will also provide greater certainty that the policy direction in Chapter 3 of the PDP that the landscape values of RCLs be maintained, and the visual amenity values of RCLs be maintained or enhanced, is achieved. RCLs are amenity landscapes, and the maintenance and enhancement of them is to be given particular regard under s7 of the RMA.
- 9.3. In addition, the need to identify landscape values of the Priority Area landscapes, and the method by which to do so, has been set by the Environment Court in objectives and policies in Chapter 3 of the PDP. In making that decision, the Environment Court was required to adhere to the requirements of s32 of the RMA, including that it was an appropriate method to achieve the objectives and the PDP and the purpose of the Act. Because this variation is a direct result of that decision, and follows the process set out by the Court, it is the most appropriate way to achieve the purpose of the Act.

## **10. EVALUATION OF THE PROPOSED PROVISIONS**

- 10.1. The provisions of the proposal are the content of the two schedules attached at Appendix A and B of this report.
- 10.2. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objective or purpose of the proposal. This assessment must:
- identify other reasonably practicable options for achieving the objectives



- assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- summarise the reasons for deciding on the provisions

10.3. The assessment of the provisions against the objectives requires an assessment against the purpose of the proposal, and also against the relevant objectives of the PDP (in accordance with s32(3)). The relevant objectives of the PDP are identified in Section 6 of this report.

**Reasonably practicable options**

10.4. For this proposal, there are no other reasonably practicable options to achieve the purpose of the variation or the objectives of Chapter 3 of the PDP. Chapter 3 sets out a clear and direct approach by identifying the Priority Areas, specifying the methodology to be used to identify and describe the values, and setting the date by which notification is required. As such, there are no other reasonable options to achieve such a specific direction.

11. For completeness it is considered that the status quo is not a reasonably practicable option as it does not address the concerns or directions raised by the Court that more specific detail as to what the policies to seek to protect or maintain within these landscapes.

**Efficiency and effectiveness**

11.1. The following table considers the efficiency and effectiveness of the proposed provisions at achieving the purpose of the proposal and the objectives of the PDP. The proposed provisions are the schedules of the landscape values of the 29 Priority Area landscapes, including their costs and benefits. For ease of reference, the purpose of the proposal and the two key objectives of the PDP are set out below:

***Purpose of the proposal:*** to implement the requirements of Chapter 3 of the PDP that direct landscape schedules be included in Chapter 21 of the PDP for identified Priority Areas landscapes

***Objective SO 3.2.5.1:*** The District’s Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related landscape capacity are identified.

***Objective SO 3.2.5.7:*** In Rural Character Landscapes of the Upper Clutha Basin: (a) Priority Areas of the Rural Character Landscapes are identified; and (b) associated landscape character and visual amenity values and related landscape capacity are identified.

<b>Costs</b>	<b>Benefits</b>	<b>Efficiency &amp; Effectiveness</b>
<p><b>Environmental</b> There are not considered to be any environmental costs of the implementation of the proposal.</p>	<p><b>Environmental</b> The inclusion of the schedules in the PDP will provide greater certainty that landscape outcomes in the PDP will be achieved. By identifying landscape values of ONFLs, it is clear what needs to be protected. By identifying landscape character and visual amenity values of RCLs, it is clear what needs to be maintained and/or enhanced. By identifying the landscape capacity for certain activities, better management of cumulative effects can be achieved. This is a <b>high</b> environmental benefit.</p>	<p>Inclusion of the schedules within Chapter 21 is an <b>effective</b> way to achieve the purpose of the proposal and the objectives of the PDP, as the purpose and objectives specifically require this to happen. The methodology used is that prescribed in the policies, and the schedules identify and describe each of the criteria required to be identified and described by the policies. A collaboration of three landscape architects, supported by other specialists and mana whenua, ensures that the identification of landscape values and related capacity occurred</p>

<p><b>Economic</b></p> <p>There are not considered to be any economic costs of the implementation of the proposal. The policy direction to protect ONFLs and maintain or enhance RCLs has already been set. Careful analysis by the landscape architects, following the methodology set by the Court, ensures that a bespoke set of values is identified for each Priority Area, and nothing unnecessary is captured by the schedules. In addition, there are no new activities that require consent, no change to the existing rule framework, and no change to the objectives and policies.</p>	<p><b>Economic</b></p> <p>The certainty provided by the schedules will reduce the cost to applicants for resource consent, as applicants will not need to identify the landscape values, landscape character or visual amenity values of the landscape. This is a <b>moderate</b> economic benefit.</p> <p>There is an economic benefit to the District by greater certainty that the landscape outcomes set in the PDP will be achieved. The District's landscapes are important to the tourism industry, and there is an economic benefit in protecting and maintaining them. This is a <b>low</b> economic benefit.</p>	<p>in a technically appropriately manner that followed best practice and the requirements of the PDP.</p> <p>Inclusion of the schedules in Chapter 21 is an <b>efficient</b> way to achieve the purpose of the proposal and the objectives of the PDP because the benefits of doing this outweigh the costs.</p> <p>Overall, the schedules, including the values and related capacity that they identify, are considered to be the <b>most appropriate</b> way to achieve the purpose of the variation and the objectives of the PDP.</p>
<p><b>Social &amp; Cultural</b></p> <p>There are not considered to be any cultural or social costs from the implementation of the proposal.</p>	<p><b>Social &amp; Cultural</b></p> <p>There is a cultural benefit through the identification of manawhenua values within the schedules (associative attributes), providing certainty for what is to be protected, maintained or enhanced. This is a <b>moderate</b> economic benefit.</p> <p>The landscape schedules were informed by public feedback about the values people hold in the landscapes. There is a social benefit through the identification of landscape values, as the schedules provide certainty that the values people hold in the landscape will be protected, maintained or enhanced. This is a <b>moderate</b> economic benefit.</p>	

11.2. Section 32(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. It is considered that the information about the values and related capacity identified in the schedules is certain and sufficient and there is no need to assess the risk of acting or not acting. The values and related capacity have been identified by a collaboration of three landscape architects, supported by mana whenua and other specialist, and has followed best practice and the methodology prescribed in the PDP. This provides a thorough understanding of the values and related capacity so that there is no uncertainty.

### **Reasons for deciding on the provisions**

11.3. The proposal is considered the most appropriate way to achieve the purpose of the Act.

11.4. The proposal meets the objective of providing landscape schedules within the PDP as directed by the provisions in Chapter 3. The methodology used to provide the assessments of the Priority Areas used best practice methodology. The inclusion of the schedules as drafted results in a more appropriate regime of managing the effects of activities within these landscape areas and is consistent with achieving the purpose of the Act.

**Appendix A Proposed Schedule 21.22 ONF and ONL**

**Appendix B Proposed Schedules 21.23 Upper Clutha RCL**

**Appendix C Methodology Report**

**Appendix D Statutory Context**