

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the

Resource Management Act 1991

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

Outcome of Expert Landscape Architects and Planners Conference Held 6,8 & 9 July 2026

Facilitator: Ken Fletcher

Note Taker: Charlotte Clark

Monday 6 July

Landscape Experts: Bridget Gilbert, Ben Espie, Steve Skelton (via TEAMS for the morning, in person for the afternoon).

Planning Experts: Emily Frew, Morgan Shepherd (via TEAMS), Scott Edgar, Dan Curley.

Thursday 9 July

Landscape Experts: Bridget Gilbert, Ben Espie,

Planning Experts: Emily Frew, Morgan Shepherd, Scott Edgar, Dan Curley.

Preamble

1. Conferencing occurred at the Queenstown Resort College.
2. The agenda as pre-circulated was accepted with only one change: to move the final bullet point under Topic 1, **Planning Issues on Individual Schedules**, to the Thursday session. However, through the course of discussions, it was agreed that it was useful to address the schedule for one of the smaller

landscape areas as part of the Monday discussion. Schedule 21.23.7 Studholme Road was worked through in the final session on Monday, prior to working through Schedule 21.22.25 Mata Au Clutha River, and Schedule 21.23.9 Wanaka Airport Environs was left to be considered by the Landscape Experts on the Wednesday.

3. On Monday Morgan was present for the morning and the afternoon until about 3pm. She was not involved in the discussion on the Mata-Au Clutha River PA Schedule.
4. After the discussions on Monday there were several items that the experts wished to think further on, and these were flagged for further discussion on Thursday. With the agreement of the Facilitator, Emily Frew made contact with Simpson Grierson seeking clarification on one aspect of the history of the Variation. This was reported to the group on Thursday.
5. A draft Joint Witness Statement was prepared by Ken Fletcher and circulated to all by email on Tuesday evening.
6. On Wednesday Bridget Gilbert and Ben Espie worked through the technical landscape details of the remaining schedules, other than 21.23.9 Wanaka Airport Environs. As Steve Skelton was unavailable on Wednesday and Thursday, this will be worked through by Steve Skelton and Bridget Gilbert off-line.
7. On Thursday 9 July a further session of all experts other than Steve Skelton occurred from 9:00am to about 3:30pm.
8. This Joint Witness Statement (JWS) represents the combined results of the discussion on Monday, the working through of the landscape schedules on Monday and Wednesday, and the further discussions on Thursday including the feedback on the discussion with Simpson Grierson, and working through the draft of this JWS.
9. We are familiar with the Environment Court Code of Practice 2023 as it relates to expert witnesses and conferencing, and have complied with it in all aspects of participating in this conference and preparing this statement

What is the strategic support in objectives and policies of the PDP, and Otago RPS for the scheduling of non-PA RCL?

10. We note that, unlike the PA schedules, there is no direction in the strategic objectives and policies to schedule non-PA areas in the PDP, and similarly, there is no direction in the objectives and policies to use such schedules for the purpose of undertaking a proposal-specific assessment.
11. However, we note that the assessment matter 21.21.2.1.a, which assists in the implementation of SP 3.3.33 and SP 3.3.45, says that Council will have regard to the schedules listed in 21.23 when considering a subdivision or development proposal. If the non-PA Schedules are adopted into the PDP, under 21.21.2.1.a Council will have regard to them.
12. We also note that the strategic policies already direct that, outside of the listed Priority Areas, landscape character and visual amenity values are identified through the application of the Landscape Assessment Methodology set out SP 3.3.45 and SP 3.3.46.
13. We note that, if the non-PA schedules are included in the PDP, the schedules should be referenced in the plan mapping tool by way of overlays, and that this tool would enable the schedules relevant to any particular property to be identified.
14. Excepting Emily Frew, the planning experts consider that, if the non-PA schedules were intended to be included in the Plan, further amendments to the strategic objectives and policies would have been required to provide consistent and clear direction and to ensure that the non-PA schedules are effective.
15. Emily Frew holds that the inclusion of the PA Schedules in the Plan reflects the Environment Court's decision that Council should not have the discretion to choose which PAs were scheduled, and whether they were scheduled. Rather, the Environment Court sought to mitigate the risk that Council would not schedule the PAs by directing the Chapter 3 policies to name the 29 PAs to be scheduled, and that the schedules be notified by a certain date. However, the lack of explicit policy requiring non-PA schedules does not inhibit creating schedules for non-PAs. Non-PA schedules are useful additions to the Plan that can provide greater clarity and certainty that the objectives and policies of Chapter 3 and 6 will be achieved, by providing detailed descriptions of the values to be maintained or enhanced for the Upper Clutha RCLs. Moreover, assessment matter 21.21.2.1.a provides a pathway

for Council to have regard to the landscape character and visual amenity values identified in Schedule 21.23 when undertaking a landscape assessment under SP 3.3.45.

16. Bridget Gilbert and Ben Espie consider this a matter beyond the scope of their expertise.
17. We note that there is no scope within the Variation to alter the objectives and policies to include such a direction.
18. We agree that, if the non-PA schedules were to be included in the plan, anything that can be done within the Plan to make this link clearer - e.g. by way of amendments to Preamble 21.23, advice notes, or footnotes similar to the cross-referencing between policies and objectives that appears in blue in the electronic PDP (ePlan) - would be an attempt to provide a connection. Dan Curley, however, does not consider this as a formal connection to higher order policy in the PDP. Bridget Gilbert and Ben Espie consider this a matter beyond the scope of their expertise.

**What is the utility of the non-PA Schedules, and will this be efficient and effective?
Can they provide benefit in terms of PDP administration with respect to assessing
suitability of outcomes proposed in specific consenting contexts?**

19. We agree that the non-PA landscape schedules have a degree of utility for both the general public and landscape experts. For the general public, especially via the mapping tool, the schedules may inform them of the identified landscape values and capacity of parts of the RCL they are interested in. For the landscape experts working on a specific proposal, the schedule will provide a potential common starting point with respect to the existing landscape values and high-level landscape capacity.
20. We agree that the degree of utility may decline over time as the landscape changes, if the schedules are not periodically reviewed and updated. This observation equally applies to the PA Schedules and Schedule 24.8 (Wakatipu Basin Landscape Character Units).
21. There was less agreement as to the degree of the utility to landscape experts.

22. Relying on her experience of resource consents and appeal processes where the PALS have been used, Bridget Gilbert considers the schedules would have high utility to the landscape experts. She also considers that the schedules will assist with rural zone landscape monitoring, as required by PDP SP 3.3.47 and SP 3.3.48.
23. Ben Espie considers that the utility to a landscape expert would be lower. He considers that the schedules would be more useful for the larger landscape areas, but less useful for the smaller landscape areas.
24. Steve Skelton considers them useful in bringing landscape matters to the centre of mind for planners. However, based on his experience with the existing PA Schedules, he considers 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 to inform site-specific landscape assessment. He also considers that subjective terms such as "low key", "modestly scaled" and the capacity ratings can, in practice, disproportionately influence consent outcomes.
25. Dan Curley, Scott Edgar and Morgan Shepherd consider that the non-PA Schedules are less directly useful to the planning practitioner than they are to the landscape expert, as for the purpose of determining outcomes (and their alignment to policy) they would rely on a site-specific assessment by the landscape expert. They consider that the possible requirement for further/rolling plan change processes; associated costs (including likely ongoing litigation) to update the schedules to reflect landscape and related capacity change may render their inclusion within the PDP as less efficient than the existing District Plan framework for non-PA areas.
26. Dan Curley and Scott Edgar consider that the schedules may be read too literally by lay people (land owners, owners of property adjoining development sites), and/or other development experts, including Council staff, leading to more protracted consenting process and likely litigation. This is the same for inevitable changes in landscape over time, which may influence the effectiveness of the schedules, and as a consequence may require further district plan variations and associated litigation (time and cost).
27. Emily Frew considers that the non-PA Schedules are useful in providing high level further guidance in case-by-case landscape assessment, to reduce the risk that

adverse effects on RCL are not effectively managed over time. She considers that the issue of cost and inefficiencies related to potential further litigation to update the non-PA Schedules also apply to the PA Schedules, and it was accepted that these met the test of being effective and efficient for inclusion in the PDP.

28. Ben Espie considers that the schedules may not effectively manage cumulative landscape effects, while Bridget Gilbert considers that they will assist in better managing cumulative landscape effects.

29. Although there was agreement that the schedules would assist in administration of the PDP, there was no agreement as to how effective and efficient this would be.

Is the size of the non-PA RCL Landscape Schedule Areas an issue, meaning they should not be Scheduled? Should changes to the Preamble be made to address this? (Addressed on the basis that additional scheduling is to be included in the Plan (PDP)).

30. We agree that the Mata Au Clutha River is an ONF and merits a schedule, as it was directed in the Topic 2 Decisions, and that the larger landscape areas (21.23.15 Hāwea Basin, 21.23.14 Hāwea Moraine, and 21.23.13 Kane Road and Luggate-Tarras Highway) are of an appropriate scale for scheduling.

31. We note that all of the smaller scheduled areas are RCL remnants, being the residual areas after identification of the PA Schedule areas, ONL/F overlays and non-rural zonings.

32. We note that SP 3.3.44 states that the non-PAs are not more or less important than the PAs in terms of the importance of their landscape character and visual amenity values, and vulnerability to subdivision use and development.

33. Ben Espie considers that the smaller separated areas (for example: 21.23.6 East of Wanaka – Mt Aspiring Road, 21.23.7, Studholme Road and 21.23.12 Sheepskin Creek) are not appropriate for scheduling due to the scale of the areas. He acknowledges that he has not looked in any detail at 21.23.8 Riverbank Road, 21.23.9 Airport Environs and 21.23.17 Quartz Creek and Maungawera.

34. Ben Espie considers that a schedule cannot be a high-level assessment for a small

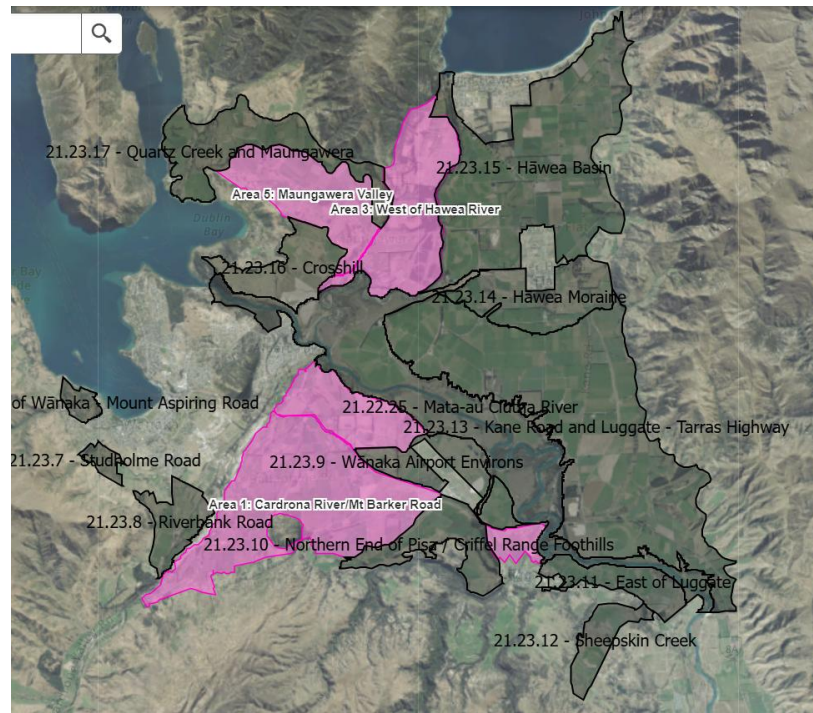
area of land with only one or two land holdings, and potentially under a single owner. He considers that these small areas are parts or remnants of a wider landscape and not landscapes in themselves (which is generally agreed). He considers that, as remnants, they are similar to the small area located in the Sticky Forest vicinity that the Environment Court considered too small to be a landscape and therefore not RCL. He considers that any useful landscape assessment for such sites would default to a full site-specific, in depth, assessment, and this cannot be a high-level assessment as the schedules are meant to be. He considers that using the existing framework (of 3.3.43 and 3.3.45) when considering a specific proposal on these small areas is more practical.

35. Bridget Gilbert notes that the Environment Court has accepted some very small RCL and ONF scheduled areas as PA Schedules, and therefore small size is not a barrier to being scheduled. She considers that the schedules still provide a good starting point for the landscape assessment of a specific proposal and may mean that less site-specific work is likely to be required for a specific proposal as the majority of the relevant detail about existing landscape values is recorded in the schedule. She considers that these areas need to be scheduled since, like all the non-PA scheduled areas, they are sensitive to landscape change and form part of the RMA s7(c) high value landscape setting of the Upper Clutha Basin. She accepts that they are not landscapes in their own right, but notes that the Plan terminology, as agreed by the Court, terms them as Rural Character “Landscapes”. Further, in many instances, the PA Schedules equally apply to areas that are not necessarily landscapes in their own right, as acknowledged in the Pre-ambles.

36. Bridget Gilbert notes that the requirement for a site-specific assessment equally applies to the PA Schedules, and that some of the schedule areas addressed in the PA Schedules correspond to small scale areas that are of a similar size to the smaller scale areas addressed in the UCLS (e.g., 21.23.4 Shortcut Road / Church Road PA RCL).

37. Bridget Gilbert considers that the reference to Sticky Forest referred to by Ben Espie above is not particularly relevant to the appropriateness or otherwise of the smaller non-PA areas. The Sticky Forest land is surrounded on its two longer sides by urban zoning with urban zoning along one of its shorter sides and the remaining (short)

boundary adjoining a Rural Zone ONL. In coming to her conclusions with respect to the RCL scale issue, she has carefully reviewed the PA and non-PA RCL mapping illustrated below (pink corresponds to PA RCL):



38. Morgan Shepherd suggested that the issue of the small size of these scheduled areas could be resolved by suitable wording in the Preamble, and there was some support for this among those present. Following the discussion on the 'scale' matter on Thursday and given Bridget's position, Morgan Shepherd does not wish to pursue any suggested wording for the Preamble as she tends to agree with Ben in that it won't necessarily address the concern. However, Bridget Gilbert noted that the PDP PA Schedules include some very small areas, yet do not have specific wording in the Preamble to distinguish the small PA schedules from small non-PA schedules, and for this reason she considers introducing wording along these lines would be confusing. Ben Espie did not see that changing the wording in the Preamble would address his concerns and considered it better to not include the smaller areas as schedules.

39. Emily Frew did not consider that the amendments, as suggested by Morgan Shepherd in her submission, would provide additional clarity for plan users, as the mapping resource that accompanies the Schedule text already illustrates the scale of

the non-PA Schedules, when compared with the PA Schedules.

40. Steve Skelton did not see size as a concern, but considered that some of the boundaries might be up for debate.

41. While there was not agreement on the appropriateness of scheduling the smaller areas, it was agreed to review the schedules for these areas to see whether the concerns could be addressed through a more detailed description of the landscapes in the schedule. Without prejudice to opinions that the non-PA schedules should not be included in the plan, it was agreed that we would do a review of one of the smaller schedules to see whether more detailed wording could address the concerns. This is discussed further below. After the review of the 21.23.7 Studholme Rd schedule there was no agreement on whether area size was an issue and whether these areas should be scheduled or not.

Is there any benefit in including landscape capacity ratings within the non-PA Landscape Schedules?

42. Bridget Gilbert and Emily Frew note that:

- The Plan has a definition of landscape capacity in relation to RCLs (3.1B.5a (ii));
- The Plan requires that for the non-priority areas of rural character landscapes, landscape capacity is identified (3.3.33) and that this should be done in accordance with the methodology in 3.3.45, which requires an assessment of effects on the landscape capacity (3.3.45.b.iii). Implicit in this requirement is consideration of existing landscape capacity;
- Rural Zone landscape monitoring under SP 3.3.48(d) requires an assessment of whether landscape capacity has not been exceeded for listed activities (the same as in the Values Identification Framework), in areas surrounding development in non-PA rural character landscapes, as part of evaluating whether SO 3.2.5 is being achieved.

43. Further, Briget Gilbert considers that the landscape capacity rating scale provides a useful starting point for landscape experts to use without having to reinvent the wheel. Further, it avoids landscape experts (and potentially other plan users)

introducing their own interpretation of a landscape capacity rating scale as part of a landscape assessment under PDP 3.3.45. She also notes that there is no guidance in Te Tangi a Te Manu (Landscape Assessment Guidelines) with respect to landscape capacity assessment methodology including a rating scale. There is no technical reason not to use the landscape capacity rating scale within the non-PA schedules given that this is an accepted tool in the PDP PA Schedules.

44. Emily Frew agreed, considering that landscape capacity ratings aided in the assessment of capacity over time and provided consistency over time and between scheduled areas, leading to a reduction in the risk that capacity would be exceeded.
45. Ben Espie considered that landscape capacity ratings were useful.
46. Steve Skelton has struggled with the hierarchy of the terminology but sees that capacity ratings are useful.
47. Morgan Shepherd, Scott Edgar and Dan Curley do not agree that the scheduling of landscape values of the non-PA areas is supported by, or consistent with the, higher order provisions of the Plan. The higher order provisions direct that, outside of the PAs, landscape values are identified in accordance with the Landscape Assessment Methodology, which direct an assessment of the effect of a proposal on related landscape capacity, rather than requiring that a capacity rating exercise is undertaken for the full range of land uses set out in SP 3.3.41. The non-PA schedules have been prepared in accordance with the values identification framework for the Priority Areas set out in SPs 3.3.40 and 3.3.41 and include capacity ratings which achieves some consistency between schedules albeit that the non-PA scheduling exercise is in itself inconsistent with the direction of the higher order provisions.
48. Emily Frew is not in agreement with the above. Landscape capacity is required to be identified for non-PAs under SP 3.3.33. The Landscape Assessment Methodology directs that a consistent rating scale for attributes, values and effects should be applied across assessments (SP 3.3.45). However, the methodology does not stipulate how to achieve a consistent rating scale for attributes, values and effects. She notes Bridget Gilbert's point that there is no guidance in Te Tangi a Te Manu with respect to landscape capacity assessment methodology including a rating scale.

Scheduling capacity ratings would apply a consistent approach across landscape capacity assessments, by identifying a 'starting point', for what the landscape capacity for non-PAs is at a high level, and could reduce the risk of inconsistent and unpredictable landscape capacity assessments when done from first principles, on a case-by-case basis.

49. Moreover, including capacity ratings for the same activities as in the VIF is consistent with, and assists with, rural zone landscape monitoring. SP 3.3.48 directs that in non-PAs, as part of evaluating whether SP 3.2.5 has been achieved, Council is required to assess whether landscape capacity has not been exceeded for a list of activities, which is nearly identical to those listed in the VIF. Identifying what the landscape capacity rating is for these activities aids in an assessment of whether or not capacity has been exceeded.

Landscape capacity rating for urban expansion?

50. This question provoked much discussion, both in principle and when we looked in detail at the schedule 21.23.7 Studholme Road.
51. It was generally agreed that most urban expansion should be done through RMA Schedule 1 plan change processes. The landscape schedules are to be used for resource consent processes only, which means that they would not be directly engaged in a plan change process that seeks rezoning of land from a rural zone to an urban zone. However, it was also agreed that resource consent applications could be made for small expansions or small proposals of urban development and activity into non-urban zones as an alternative to using Schedule 1 processes. A resource consent application of this sort would engage the landscape schedules in terms of the urban expansion, in which case a capacity rating for urban expansion is relevant. Experts agree that the definition of urban expansion is unclear. It was debated whether "urban expansion" was distinct from urban development, as defined in Chapter 2 PDP Definitions Chapter.
52. When we looked at the detail of the schedule for Studholme Road, the fact that this area is identified in the QLDC 2021 Spatial Plan as an area for potential future urban expansion caused problems with the assignment of a capacity rating for urban expansion, and for the relative ratings for urban expansion and rural living. See the

mark-up of this schedule for some possible solutions. The text insertion suggested to address this was: “Extremely limited to no landscape capacity outside the ambit of the 2021 Spatial Plan”.

53. Subject to the concerns raised above about the definition of urban expansion, we are agreed that a capacity rating for urban expansion may be appropriate.

Detailed Review of 21.23.7 – Studholme Road

54. This was undertaken by the full group as an exercise to identify issues arising from a small area schedule. It was done on the basis that there was no agreement that inclusion of small areas in the schedules was appropriate. However, if they were to be included, the exercise was intended to consider what would the schedules look like, could the landscape experts agree on what should be included and at what level of detail, and whether the resulting schedule would allay the concerns about the small size of the area under the schedule.
55. The starting point used was the May 2026 schedule as attached to the s42A report. For the detail see the marked-up schedule attached referenced as **JWS Mark up 08.07.26**. Below are only the matters of wider relevance. Note that issues around a capacity rating for urban expansion are discussed under that topic above.
56. Noting that this area is a small part of a large working farm, the capacity rating for farm buildings raised some issues. This is currently:

Farm buildings – some landscape capacity for modestly-scaled buildings that reinforce the existing rural character.

57. Given farm buildings that meet the standards in the Plan are a permitted activity, there was uncertainty about what “*modestly-scaled buildings that reinforce the existing rural character*” might mean in terms of measurement . It was agreed that they would be larger than those permitted in the plan, but how much larger?
58. Bridget Gilbert considered that landscape experts were accustomed to the term “modestly-scaled”, and would interpret it appropriately. Further, the term was thoroughly tested through the PA Schedules process and has been carried through to the PDP RCL and ONL PA schedules (which were approved by the Environment

Court).

59. This was discussed further on Thursday, but no further resolution was obtained.

60. Morgan Shepherd left the meeting after the discussion on 21.23.7 Studholme Road and before the discussion on the Mata Au Clutha River Schedule.

21.22.25 Mata Au Clutha River Priority Area Schedule

61. As with the Studholme Rd discussion, the detail is recorded in the attached marked-up schedule referenced **JWS mark up 07.07.26**. Only points of more general scope are referenced here.

62. We used the s42A May 2026 version of the schedule as marked-up by Steve Skelton as the starting point for the discussion.

63. We note that Steve Skelton had been provided with the s42A schedule by Anderson Lloyd, and it came marked-up with additions added by Anderson Lloyd. As these were not views advanced by Steve Skelton, or by any of those present, they were deleted as not representing the views of the undersigned planning and landscape experts and being out of scope for a planning and landscape expert conference.

64. Scott Edgar considers that capacity for urban expansion in the ONF is most likely to be adjacent to existing urban areas. This is however still subject to the definition of urban expansion. From a landscape perspective, Ben Espie agrees with Scott Edgar's comment.

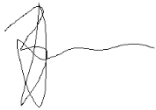
65. In Bridget Gilbert's view, it is often the case that ONF (or ONL) land directly adjacent an urban area is more sensitive to development change from a landscape perspective due to factors such as: the important associative and perceptual values it affords the neighbouring urban area; the absence of a defensible landscape boundary to the ONF/L edge which means that even very small incursions make the broader area vulnerable to urban development sprawl. She notes that this issue was extensively debated during the PA Schedules process, with the landscape experts agreeing that it was inappropriate to signal an increased landscape capacity for urban expansion in ONFs (and ONLs) abutting urban areas and that this 'approach' has been carried through to the PDP PA Schedules. She also notes that urban

expansion (or development) inevitably means that the area affected will fail to qualify in terms of 'naturalness' as an ONF, let alone in terms of 'outstanding-ness' and therefore fails to protect landscape values, which is one of the key PDP landscape policy tests for ONFs.

DATED this 14th day of July 2026



Bridget Gilbert



Emily Frew



Benjamin Espie



Stephen Skelton



Morgan Shepherd



Daniel Curley



Scott Edgar