

Before the Independent Hearing Panel

Under the

Resource Management Act 1991

In the matter

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

**REBUTTAL EVIDENCE OF BRIDGET MARY GILBERT ON BEHALF OF QUEENSTOWN
LAKES DISTRICT COUNCIL**

LANDSCAPE

12 August 2026



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1. INTRODUCTION

1.1 My full name is Bridget Mary Gilbert. I am a Landscape Architect and Director of Bridget Gilbert Landscape Architecture Ltd, Auckland. I have held this position since 2005.

1.2 My qualifications and experience are set out in my Evidence in Chief, dated 29 May 2026. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it, as set out in my Evidence in Chief.

Submitter expert evidence and expert witness conferencing

1.3 I have read the following expert evidence filed on behalf of submitters:¹

- (a) Evidence in Chief of Ben Espie (landscape) dated 26 June 2026²;
- (b) Evidence in Chief of Steve Skelton (landscape) dated 26 June 2026³;
- (c) Evidence in Chief of Dan Curley (planning) (undated)⁴;
- (d) Evidence in Chief of Morgan Shepherd (planning) dated 25 June 2026⁵;
and
- (e) Evidence in Chief of Scott Edgar (planning) dated 26 June 2026⁶.

1 Evidence and JWS' accessible online at <<https://www.gldc.govt.nz/your-council/district-plan/proposed-district-plan/hearings/upper-clutha-landscape-schedules-variation>>.

2 For Mata Au Investments Ltd (OS17); Exclusive Developments Ltd (OS45); Wanaka Station Trust et al (OS8); Montreal Trustees 2024 Ltd (OS32); D & S Brent as trustees of Hawthenden Trust (OS22 and OS30); Lake McKay 2024 Ltd Partnership (OS16); Grandview Grazing Ltd (OS9); Devon Dairy Holdings Ltd (as successor to Devon Dairy Farms Ltd) (OS29); J & C Leith (OS20); Jolly Holdings Ltd (OS21); Laing Dairy Ltd (OS35); Sunnyheights Ltd (OS37); SIO No12 Limited (OS26); Scott Aubrey Family Trust (OS43); PLDC Trustees Ltd and A Wright (OS19).

3 Dirk and Rebecca Venter (OS36); The NW & DJ Pittaway Family Trust (OS39); and Kathryn and Vaughn Woodfield (OS47).

4 For Devon Dairy Holdings Ltd (as successor to Devon Dairy Farms Limited) OS29; D & B Brent & Hawthenden Ltd (OS22 and OS30); Jolly Holdings Ltd (OS21); J & C Leith (OS20); Laing Dairy Ltd (OS35); Grandview Grazing Ltd (OS9); Lake McKay 2024 Limited Partnership (OS16); and Mata Au Investments Ltd (OS17).

5 For Bell Group Limited.

6 For Sunnyheights Limited (OS37 and FS58); Scott Aubrey Family Trust (OS43); Exclusive Developments Limited (OS45).

1.4 On 6, 8⁷ and 9 July 2026 I attended joint planning and landscape expert witness conferencing that produced the Planning and Landscape Joint Witness Statement dated 9 July 2026 (**JWS**).

1.5 The July 2026 JWS also included a JWS Version of the Upper Clutha Landscape Schedules (**UCLS**) discussed at the expert conferencing. Matters of disagreement in the JWS Version of the UCLS are shown in red text, with my reasoning provided in comment boxes.

Site Visits

1.6 After receiving the submitter expert evidence, I attended a site visit on 2 July 2026 with Ms Frew. Key publicly accessible locations we visited were:

- (a) all of the non-PA UCLS areas; and
- (b) the Mata-Au Clutha River PA area including the river terraces.

2. SCOPE OF THIS REBUTTAL EVIDENCE

2.1 The scope of my rebuttal evidence (**Rebuttal**) is limited to:

- (a) A summary of the remaining landscape related matters post expert conferencing.
- (b) Commentary with respect to references to the Queenstown Lakes Spatial Plan 2021 (**Spatial Plan**), references in Schedules 21.23.7 Studholme Road and 21.23.8 Riverbank Road.
- (c) Further explanation in relation to the issue of the size of some UCLS raised in the expert conferencing.
- (d) Commentary on the defined terms 'urban expansions' and 'farm scale quarries'.

7 Conferencing on this day was limited to myself, Ben Espie and (for a short period), Morgan Shepherd.

- 2.2** In this Rebuttal, I have made recommendations with respect to text amendments to 21.23.8 Riverbank Road. An updated version of Schedule 21.23.8 Riverbank Road is appended to Ms Frew's Rebuttal evidence.

3. SUMMARY OF THE REMAINING LANDSCAPE RELATED MATTERS POST EXPERT CONFERENCING

- 3.1** For completeness, my understanding of the remaining landscape related matters in dispute post expert conferencing can be summarised as follows:

General Matters

- (a) The relevance of the Spatial Plan in Schedules of Landscape Values.
- (b) The utility and appropriateness of including Schedules for the smaller UCLS areas.
- (c) The definition of 'urban expansion' in terms of its clarity.

UCLS Specific Matters

- (d) Appropriateness of excluding the Pittaway land from the UCLS area (21.23.9).
- (e) Whether information regarding the influence of the Wānaka Airport is appropriate to address in the 'General Description of the Area' part of the UCLS (21.23.9).
- (f) Landscape capacity rating or guidance text for urban expansion (21.22.25, 21.23.7).
- (g) Landscape capacity rating or guidance text for rural living (21.23.6, 21.23.7, 21.23.10, 21.23.13, 21.23.14, 21.23.15).
- (h) Landscape capacity rating or guidance text for farm buildings (21.23.7).

- 3.2** It is noted that no clear recommendations were provided by the other landscape experts in relation to the landscape capacity rating for urban expansion and rural living development in 21.23.7.

- 3.3** My position on the UCLS Specific Matters remains as recorded in the JWS and its attachments for the reasons stated there. I expand on my statements recorded in the JWS on the general matters in dispute from a landscape perspective below.

4. QUEENSTOWN LAKES SPATIAL PLAN 2021 REFERENCES

- 4.1** The Notified and 42A Version of 21.23.7 Studholme Road and 21.23.8 Riverbank Road both reference the Spatial Plan. This is because the Spatial Plan signals part of 21.23.8 Riverbank Road and all of 21.23.7 Studholme Road as future urban.⁸
- 4.2** As a landscape expert, I consider that the recognition of a community-based, non-statutory document such as a district's spatial plan is appropriate in a Schedule of Landscape Values and landscape capacity from a methodological perspective. Te Tangi a te Manu (Aotearoa New Zealand Landscape Assessment Guidelines) (TTatM) explains that non-statutory documents can be useful in understanding landscape values.⁹ I also note that in my experience, landscape assessments accompanying resource consent (and plan change applications) where such a non-statutory document exists, typically reference such a document.
- 4.3** In the case of the Spatial Plan, this non-statutory document comprises a vision and framework for how the district will grow, with the wellbeing of people and the environment in mind. The document is co-authored by Queenstown Lakes District Council, central Government, Aukaha and Te Ao Marama inc, and draws from numerous community and stakeholder workshops between 2018 and 2020 in reaching its conclusions.
- 4.4** As a consequence, I consider the Spatial Plan to be a non-statutory document that provides relevant insight with respect to landscape values and merits mention in 21.23.7 Studholme Road, 21.23.8 Riverbank Road, and 21.23.15 Hāwea Basin.
- 4.5** However, in thinking about the best way to 'carry through' the potential influence of the Spatial Plan in the landscape capacity sections of the relevant schedules

8 Map 8, accessible online at <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan>.

9 For example, see TTatM: paragraph 5.24.

addressing urban expansion and rural living, while achieving a degree of 'alignment' with the way that these sections of the other UCLS have been drafted, I consider that some refinement is beneficial.

- 4.6** For this reason, I confirm that I support the red text changes in the JWS version of 21.23.7 Studholme Road with respect to the landscape capacity for urban expansion and rural living as more appropriately framing the relevance of the Spatial Plan and aligning with the way that other UCLS are drafted, subject to some additional refinements as set out below.
- 4.7** In considering the JWS version text of 21.23.7 Studholme Road, I have picked up a number of typographical errors which are referenced below in purple text. This includes using the correct title when referring to the Spatial Plan, being "Queenstown Lakes Spatial Plan 2021". I support correcting these typographical errors as shown below and appended to Ms Frew's Rebuttal evidence.
- 4.8** Additionally, Ms Frew in her Rebuttal has recommended some further changes to the JWS guidance text to improve clarity. I also confirm that I support the additional changes as described in Ms Frew's Rebuttal evidence. I consider that Ms Frew's recommended changes better acknowledge that the capacity rating is applied despite the Spatial Plan also existing which may influence landscape capacity. Ms Frew's changes also clarify where a Schedule area is all, or partially, identified as future urban in the Spatial Plan.
- 4.9** The expert conferencing did not address 21.23.8 Riverbank Road, as no specific landscape or planning expert evidence was filed in relation to that Schedule.
- 4.10** However, for reasons of consistency, I consider that the changes recommended above in relation to 21.23.7 should be replicated in 21.23.8 Riverbank Road. For completeness, I consider the landscape capacity rating and relevant qualifying comments for urban expansion and rural living are similar across the two schedule areas. Albeit with minor refinement requirements to 21.23.8 Riverbank Road in relation to the qualifying comments for rural living to recognise:

- (a) the high level of visual enclosure provided by mature shelterbelts in places; and
- (b) the fact that the defensible edge issues for 21.23.7 are not as problematic for 21.23.8, largely due to the separation of the area from urban zoned land by either rural lifestyle zoned land or a road corridor.

4.11 I have also noted that the Spatial Plan identifies part of 21.23.15 Hāwea Basin as a candidate for future urban investigation (subject to public transport connection) but the Schedule omits reference to the Spatial Plan, except for in the capacity rating guidance text for urban expansions. I consider that the Spatial Plan should be referenced in a similar way to 21.23.7 Studholme Road and 21.23.8 Riverbank Road, and therefore I recommend amendments to paragraph 22, urban expansions and rural living, in 21.23.15 Hāwea Basin. These amendments are shown below in my evidence, and are appended to Ms Frew’s Rebuttal evidence.

4.12 Together these changes are:¹⁰

21.23.7 Studholme Road: (Purple rebuttal tracked against JWS version)

9A. The area has been identified as future urban for urban expansion in the QLDC 2021 Queenstown Lakes Spatial Plan 2021.

Urban expansions – extremely limited to or¹¹ no landscape capacity outside the ambit of the QLD 2021 Spatial Plan. However, it is acknowledged that the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

Urban expansions – some landscape capacity as identified in the QLDC 2021 Spatial Plan. From a landscape perspective, the area suggests a logical expansion area as it adjoins the existing urban area and the area’s ‘outer’ boundary corresponds to legible and defensible ‘landscape’ boundary (i.e. ONL/escarpment boundary).

10 NB purple text is used to distinguish the ‘Rebuttal Version’ text from the ‘JWS Version’ text (blue agreed, red disagreed), the ‘s42A Version’ text (black underlined and strikethrough text) and the ‘Notified Version’ text (black)).

11 Noting that the term ‘to’ has been corrected to ‘or’ in the Rebuttal Version of 21.23.7 to align with the terminology used throughout the UCLS and the 2.13 Preamble.

~~Rural living – limited landscape¹² capacity outside the ambit of the QLD 2021 Spatial Plan,~~ to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural character of the area is vulnerable to fragmentation and ‘domestication’ through rural living development and the absence of a discernible defensible edge to Wānaka makes the neighbouring parts of the area particularly vulnerable to urban development creep. Any additional rural living should be: set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and maintain rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points. However, it is acknowledged that the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

~~Rural living – extremely limited or no landscape capacity to absorb additional rural living, given that the area has been earmarked for urban expansion in the QLDC 2021 Spatial Plan and rural living development is likely to stymie efficient urban use in the future.~~

21.23.8 Riverbank Road: (Purple rebuttal tracked, no JWS version)

Urban expansions – extremely limited or no landscape capacity. However, it is acknowledged that part of the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

~~Urban expansions – some landscape capacity as identified in the QLDC 2021 Spatial Plan. From a landscape perspective, the area suggests a logical expansion area as it adjoins the existing urban area and the area’s ‘outer’ boundary corresponds to legible and defensible ‘landscape’ boundary (i.e. ONL/escarpment boundary).~~

12 The term ‘landscape’ has been inserted here to align with the way that the landscape capacity for rural living (and other land-uses) other schedules are drafted.

Rural living – limited landscape capacity to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural character of the area is vulnerable to fragmentation and ‘domestication’ through rural living development. Any additional rural living should be: set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and maintain rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points (where relevant). However, it is acknowledged that part of the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

~~Rural living – extremely limited or no landscape capacity to absorb additional rural living, given that the area has been earmarked for urban expansion in the QLDC 2021 Spatial Plan and rural living development is likely to stymie efficient urban use in the future.~~

21.27.15 Hāwea Basin: (Purple rebuttal tracked against JWS version)

22. The urban residential, commercial and community facilities development enabled by Lake Hāwea South Structure Plan and which integrates a Building Restriction Area (BRA) along its western, southern and eastern edges to create a defensible edge and manage the risk of urban development creep. Part of the area is identified as a potential candidate for future urban development in the Queenstown Lakes Spatial Plan 2021.

Urban expansions – ~~some~~ landscape capacity as identified in the QLDC 2021 Spatial Plan. extremely limited or no landscape capacity. However, it is acknowledged that part of the Schedule area is identified as potentially suited to future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

Rural living – very limited landscape capacity to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural

character of the area is vulnerable to fragmentation and ‘domestication’ through rural living development, particularly along the edge the Hāwea River, and around the edges of the existing settlements at Lake Hāwea and Hāwea Flats. Generally, such an outcome could undermine the impression of this part of the Upper Clutha Basin as a spacious working rural landscape. For development along the edge of the Hāwea River corridor, it is important that any new development is visually discreet in views from the Hāwea River Track. More generally, any additional rural living should be set well back from roads and public tracks; co-located with existing development ([where relevant](#)); integrated by existing landform and/or existing vegetation; designed to be of a small scale and [maintain spacious, ‘low-key’](#) rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points. [However, it is acknowledged that part of the Schedule area is identified as potentially suited to future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity](#)

- 4.13** These changes are shown in the Rebuttal Versions of 21.23.7 Studholme Road, 21.23.8 Riverbank Road, and 21.23.15 Hāwea Basin attached to Ms Frew’s Rebuttal evidence.

5. UCLS SIZE

- 5.1** The July 2026 JWS records disagreement between the experts with respect to the benefit of including schedules for the smaller UCLS areas and contains an explanation of the reasons in support for the experts’ respective positions.¹³ Particular schedules cited were 21.23.6 East of Wanaka – Mt Aspiring Road, 21.23.7 Studholme Road, and 21.23.12 Sheepskin Creek.
- 5.2** My reasons for supporting the sizes of the UCLS areas include: the fact that the Environment Court has accepted some very small Rural Character Landscape (**RCL**) and Outstanding Natural Feature (**ONF**) scheduled areas as Priority Area Landscape

13 JWS, at [30]-[41].

Schedules (PALS), and therefore small size is not a barrier to an area being scheduled; and my review of the PA and non-PA RCL mapping.

- 5.3** To assist a better understanding of my evidence on this matter, I set out below the ‘assessment extent’ area measurements for the three smallest PALS and UCLS.

Smallest PALS	Approximate Area Measurement
21.22.7 Feehly Hill	14 ha
21.22.11 Mount Iron	164 ha
21.23.4 Church Road Shortcut Road	150 ha
Smallest UCLS	Approximate Area Measurement
21.23.6 East Of Wanaka – Mount Aspiring Road	97 ha
21.23.7 Studholme Road	84 ha
21.23.12 Sheepskin Creek	285 ha

- 5.4** In my opinion, the above measurements demonstrate that the relatively small scale or size of some of the UCLS is not out of keeping with some of the smaller PALS.

- 5.5** Further, in my view, the UCLS 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.

- 5.6** Referring to his involvement in the District Plan Review process for the Rural Visitor Zones (**RVZ**), Mr Espie appears to be suggesting that due to the similarly small scale of the RVZ areas and the smallest UCLS areas, the finer grained landscape sensitivity analysis undertaken for the RVZ should also be applied to the smallest UCLS areas¹⁴.

- 5.7** I was also involved in the RVZ and disagree with this conclusion. In my opinion, a far finer grain of landscape (including sensitivity) analysis is required to support rezoning of land from Rural Zone to RVZ compared to the grain of landscape analysis required to inform high-level landscape values and landscape capacity analysis for a Schedule of Landscape Values. This is because the UCLS do not alter

14 B Espie EIC: paragraph 21.

any district plan objectives, policies or rules (as explained in the 21.22 and 21.23 Preambles), whereas a change from Rural Zone to RVZ does.

5.8 Mr Espie and I both comment in the JWS on the relevance of the Environment Court’s observations regarding RCL in *Sticky Forest*¹⁵ under the UCLS size discussion.¹⁶

5.9 In thinking about this matter further, I consider that an emphasis on whether an area of RCL qualifies as a “landscape” is unhelpful. While the term **Rural Character Landscape** includes the word *landscape*, the RCL is not intended to identify discrete landscapes as such. Rather, it is a district planning construct that encompasses rural-zoned land that is not identified as an Outstanding Natural Feature or Outstanding Natural Landscape. In this sense, the RCL operates as a planning overlay or categorisation (albeit one that is not specifically mapped), rather than as a ‘landscape’ or ‘landscape unit’ in its own right.

5.10 I also understand that the smaller UCLS are supported by a number of submitters, as set out in paragraph 7.9 of Ms Frew’s Rebuttal.

6. DEFINED TERMS IN THE PREAMBLE

6.1 I have reviewed the 21.23 Preamble definition changes recommended by Ms Frew in relation to ‘urban development’ and ‘farming activities’ which ties these terms back to the relevant PDP Chapter 2 Definitions.

6.2 I agree with these changes and confirm that they align with the thinking that I applied in the evaluation of landscape capacity for these activities in both the PALS and UCLS.

¹⁵ *Beresford v Queenstown Lakes District Council* [2024] NZEnvC 182.

¹⁶ JWS, at [34]-[37].

7. CONCLUSION

- 7.1** For the reasons set out in this Rebuttal statement and the July 2026 JWS (including the marked up JWS Version of the UCLS discussed at the expert conferencing), I consider that the Rebuttal Version of the UCLS attached to Ms Frew's Rebuttal Evidence are appropriate from a landscape perspective.

Bridget Gilbert

Dated: 12 August 2026