

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the Resource Management Act 1991

In the matter of a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23

Outcome of Expert Landscape Architects Conference Held 2 October 2023

Facilitator: Ken Fletcher

Landscape Architect Experts: In person Bridget Gilbert, Jeremy Head, Nikki Smetham, James Bentley, Ben Espie, Steve Skelton, Paul Smith. Diane Lucas (via Zoom)

1. We are familiar with the Environment Court Code of Practise 2023 as it relates to expert witnesses and conferencing, having read the relevant parts within the last twelve months, have complied with it in all aspects of participating in this conference and preparing this statement.

Schedule Structure and Content

2. All references to the Landscape Schedules below are to the version as included in rebuttal evidence of Bridget Gilbert dated 29 September 2023;
3. The following agreements and disagreements are about the structure of the schedules in general, and should not be taken as approving the detailed content of any particular schedule;
4. Considering the Landscape Schedules, their structure and content, we agree that:
 - a) each PA Schedule has been written to be read in its entirety and selected excerpts should not be read in isolation or taken out of the context of the entire schedule;
 - b) each PA Schedule should be read in conjunction with the Preamble and not in isolation; particularly that:
 - i. the schedules are written at the broad scale PA level, they are a high level description and assessment, and any proposed project will be set at a smaller scale within the PA;
 - ii. each proposed project will require a specific landscape assessment that identifies how the project sits within the PA, which attributes and values of the PA are relevant to the project, and an assessment against those values.

- c) The schedules are themselves a summary of a large amount of technical detail and specific landscape assessments for a particular project may need to reference the underlying detailed reports;
- d) The schedules are constrained by what the Strategic Objectives and Policies require to be done, which is a planning framework and not necessarily aligned with the landscape principles and practise;
- e) We are familiar with **Te Tangi a te Manu** and this underpinned our discussions and this statement;
- f) The **General Description of the Area** content was discussed, and it is agreed that they are set at the appropriate level, but should be read in conjunction with the mapping to locate them correctly;
- g) The presence of pests, wilding pines and other weeds needs to be included within the schedule. They are attributes of the landscape, but they do not contribute to the landscape values that need to be protected;
- h) With the exception of the Summary of Landscape Values, we agree with the structure of the Schedules, the headings and sub-headings as below, and the material under each subheading as reflected in the various different Schedules (while making no comment on the correctness of any statement included in any particular schedule);
- i) Agreed headings and subheadings:
 - General Description of the Area
 - Physical Attributes and Values
 - Important landforms and land types:
 - Important hydrological features:
 - Important ecological features and vegetation types:
 - Important land-use patterns and features:
 - Important archaeological and heritage features and their locations:
 - Mana whenua features and their locations:
 - Associative Attributes and Values
 - Mana whenua associations and experience:
 - Important historic attributes and values:
 - Important shared and recognised attributes and values:
 - Important recreation attributes and values:
 - Perceptual (Sensory) Attributes and Values
 - Legibility and expressiveness attributes and values:
 - Particularly important views to and from the area:
 - Naturalness attributes and values:
 - Memorability attributes and values:
 - Transient attributes and values:
 - Remoteness and wildness attributes and values:
 - Aesthetic attributes and values:
 - ... (placeholder for Summary of Landscape Values not agreed)

Landscape Capacity

5. We are not agreed on how and where to record the landscape values that must be protected under Strategic Objective 3.2.5.2(a) and Strategic Policy 3.3.30. The lack of agreement arises from differences over whether the attributes and values are inextricably linked and therefore detailed under the headings and subheadings above and summarised at a high level in the Summary of Landscape Values as in the Rebuttal Version of the schedules;
or whether the key values that must be protected are readily separable from the attributes that inform the values, and whether the key values can and should be clearly identified.
6. There is a secondary question of where the ratings of the values should sit in the schedule – collected together under a suitable heading in place of the Summary of Landscape Values, or stated under the relevant headings and subheadings as outlined above, with no Summary aggregation.
7. To clarify the differences between the two approaches, and to test the alternative approach to that of the Rebuttal version, those supporting the alternative approach undertook an exercise to reformulate a Rebuttal Version of one schedule. The schedule, 21.22.12 Western Whakatipu Basin, was chosen as it was an expansive landscape in which none of the experts had a client interest. The intention was not to change any of the detail assessment (although some corrections were identified), but to test and highlight the different approaches to the structure of the Schedules. The reformulation was done by Nikki Smetham and Ben Espie and is attached as appendix 1, while the original rebuttal version is in appendix 2.
8. In the process of doing the reformulation, the area of difference was refined to be primarily in the identification of the key physical landscape values. It is agreed that the associative and perceptual values and attributes are intertwined and cannot readily be separated.
9. Of particular concern to all the experts is how the Schedules would be viewed and used by the users of the schedules, ranging as they will from landowners looking from the perspective of their small piece of a PA, through the gamut of RM professionals to planners and landscape professionals. Those favouring the Rebuttal approach stressing that the Schedules were a summary and any further summarisation abstracted too much from the necessary detail, while those of the alternative view considered that the key values that must be protected needed to be succinctly stated.
10. The different views of the experts are summarised as:

- a. Bridget and Jeremy support the Rebuttal approach, stressing that the Schedules have been written to be read in their entirety.
- b. Nikki and Ben take the alternative view, notwithstanding that they agree the schedules need to be read in their entirety and that the Preambles go some way to address potential confusion. They consider that the rebuttal structure does not clearly set out the values of each PA that must be protected under the objectives and policies.
- c. James did not raise the structure of the schedules in his evidence but appreciates both views, while considering that both views could benefit from minor tweaks.
- d. Steve considers that the Summary of Landscape Values could be deleted and be replaced by a rating of the values at the end of each section.
- e. Paul did not raise the structure as an element of his evidence, but after the discussion he generally agrees with the rebuttal version.
- f. Di appreciates that landscape complexity means that bundling landscape attributes and values makes some sense, however the provisions and the common sense test requires that there be clear recognition of what actually is valued, and the current rebuttal version does not achieve that. There needs to be clarification of what are the values to be protected. That could be through an edit to delete the attributes that are not contributing to the landscape values, and greater articulation of the landscape values.

Landscape Capacity Rating

11. The experts coalesced around two rating schema – the Rebuttal Version and that proposed by James in his EIC at para 64, p 15. Both are copied below.

Rebuttal schema

Some landscape capacity: typically this corresponds to a situation in which a careful or measured amount of sensitively located and designed development of this type is unlikely to materially compromise the identified landscape values.

Limited landscape capacity: typically this corresponds to a situation in which the landscape is near its capacity to accommodate development of this type without material compromise of its identified landscape values and where only a modest amount of sensitively located and designed development is unlikely to materially compromise the identified landscape values.


Very limited landscape capacity: typically this corresponds to a situation in which the landscape is very close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only a very small amount of sensitively located and designed development is likely to be appropriate.

Extremely limited landscape capacity: There are extremely limited or no opportunities for development. Typically this corresponds to a situation in which the landscape is extremely close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only an extremely small amount of very sensitively located and designed development is likely to be appropriate.

No landscape capacity: typically this corresponds to a situation where development of this type is likely to materially compromise the identified landscape values.

James Schema

Table 1: Absorption capacity ratings for Priority Areas (PA)s	
Landscape Capacity	Description ¹
Very High	<i>The area is able to accommodate a substantial amount of new development, providing it is absorbed in a manner that protects identified landscape values.</i>
High	<i>The area is able to accommodate a high amount of new development, providing it is able to be absorbed in a manner that protects identified landscape values.</i>
Moderate / High	<i>The area is able to accommodate moderate to high amounts of development, providing it is able to be absorbed in a manner that protects identified landscape values.</i>
Moderate <i>(potentially 'some' in preamble)</i>	New development may be accommodated provided it has regard to the character and sensitivity of identified landscape values. There are landscape constraints and therefore the key landscape values must be retained and enhanced.
Moderate / Low <i>(potentially 'limited' in preamble)</i>	A moderate to low amount of development could be accommodated in limited situations, whilst still protecting all identified landscape values. The landscape is close to its development capacity, therefore sensitively located and designed development would be appropriate.
Low <i>(potentially 'very limited' in preamble)</i>	Development has the potential to generate considerable adverse effects on landscape values and/or available views. Occasional, small-scale development may be possible, providing it has regard to the character and sensitivity of the landscape and continues to protect all identified landscape values.
Very Low <i>(potentially 'very limited to no', and 'no' in preamble)</i>	There are very limited or no opportunities for development. Any development possible would be very occasional, exceptional, unique and very small-scale/ discrete and that it continues to protect all identified landscape values.

Landscape capacity within ONLs and ONFs would typically operate in this range and would depend on a particular type of development. 

¹ New development relates to the activity sought within the relevant application for consent application.

12. There was considerable discussion around the need and appropriateness of a No Landscape Capacity rating. This was resolved in the conferencing with the planners on the following day, however it must be noted that Di Lucas was not in attendance on that day.
13. All agreed that the final schema adopted should be prefaced with the qualifications from the Preamble, that the capacity ratings were applied at the PA level, that any specific proposal within a PA would need to be specifically assessed at its scale and that landscape capacity assessment was necessarily an imprecise exercise.

4 October 2023

Signed

 BEN ESPIE

 Steve Skelton

 JAMES BENTLEY

 Paul SMITH.

 Jeremy Head.



Bridget Gilbert



Nikki Smetham