

Before the Independent Hearing Panel

Under the

Resource Management Act 1991

In the matter

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

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

LANDSCAPE EVIDENCE

29 May 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.

Qualifications and Experience

1.2 I hold the qualifications of Bachelor of Horticulture from Massey University and a postgraduate Diploma in Landscape Architecture from Lincoln College. I am an associate of the Landscape Institute (UK) and a registered member (Fellow) of the New Zealand Institute of Landscape Architects. I am currently an Independent Hearing Commissioner for Auckland Council. I have recently been a panel member of the Auckland Urban Design Panel (chair endorsement).

1.3 I have practised as a Landscape Architect for over thirty years in both New Zealand and England. Upon my return to New Zealand, I worked at Boffa Miskell Ltd in its Auckland office for seven years. I have been operating my own practice for the last twenty years based in Auckland.

1.4 During the course of my career, I have been involved in a wide range of work in expert landscape evaluation, assessment and advice throughout New Zealand including:

- (a) landscape assessment in relation to regional and district plan policy;
- (b) preparation of structure plans for rural and coastal developments;
- (c) conceptual design and landscape assessment of infrastructure, rural, coastal, and urban development; and
- (d) detailed design and implementation supervision of infrastructure, rural, coastal, and urban projects.

1.5 I was appointed as one of three peer reviewers¹ of the Landscape (including natural character) Assessment Guidelines project under the direction of Tuia Pito Ora (the

¹ With Ms Di Lucas and Mr Stephen Brown.

New Zealand Institute of Landscape Architects). That work has resulted in the publication of *Te Tangi a te Manu* (Aotearoa New Zealand Landscape Assessment Guidelines) (**TTatM**), which was unanimously adopted by Tuia Pito Ora in May 2020. This work has given me an up to date understanding of landscape assessment best practice.

1.6 I have been engaged by Queenstown Lakes District Council (**QLDC** or **Council**) to provide landscape advice and evidence on various matters / topics associated with the Council level hearings and Environment Court appeals, on the Queenstown-Lakes Proposed District Plan (**PDP**). This includes:

- (a) Environment Court appeals: Topic 2 – Rural Landscapes, Topic 18 – Rural Zone, Topic 22 – Jacks Point, Topic 23 – various Queenstown and Upper Clutha Rezoning (including Ski Area Subzones and rezoning of land adjacent or within ONF/Ls and within RCL), Topics 30 and 31 – Wakatipu Basin (text and various rezonings, including resort zones); and
- (b) Council hearings: Stage 2 Wakatipu Basin and Stage 3B – Rural Visitor Zone.

1.7 I have assisted the Council with landscape peer review advice in relation to several resource consent applications and plan change and variation processes. This work includes proposals to develop land within Outstanding Natural Landscapes (**ONLs**), Outstanding Natural Features (**ONFs**) and Rural Character Landscapes (**RCLs**).

1.8 Of particular relevance is my work for the Council on the Priority Area Landscape Schedules Variation (**PALS**), which was the subject of Council decisions in June 2024. I then assisted the Council in relation to the Environment Court appeals lodged in relation to the PALS Variation. The majority of these appeals have now been resolved² through the issue of a Consent Determination³ and a number of Consent Orders.⁴ I refer to these as the **Existing PALS**, or the **PALS Variation**. The outcome of the PALS variation and appeal process has informed my recommendations for the Upper Clutha Landscape Schedules Variation, which I explain in more detail shortly.

2 I am not involved in any of the outstanding appeals.

3 *Burdon v Queenstown Lakes District Council* [2026] NZEnvC 40.

4 Refer to my Appendix 2.

- 1.9** In addition, I co-authored the Wakatipu Basin Land Use Planning Study (2017)⁵ and provided landscape advice to Council in relation to the Urban Growth Boundary at Hāwea (2019). Through the Topic 2 – Rural Landscapes appeals I was called as a landscape witness for the Council and also completed site visits through the Upper Clutha Basin and the Whakatipu Basin as part of identifying and assessing the Priority Areas that would be subject to the PALS Variation. I have attended various expert conferences and mediations involving other landscape experts in relation to land across the District, including the Upper Clutha Basin (and Whakatipu Basin) for ONL, ONF and RCL land.
- 1.10** This background, including in relation to the origin of the Chapter 3, 6 and 21 provisions, has given me a good understanding of how the PDP operates, the development pressures across the District (including locations) and the scale and character of development that is typically considered to be appropriate within the ONF/L and RCL areas of the District from a landscape expert perspective.
- 1.11** I refer to the Upper Clutha Landscapes Schedules Variation as the **UCLS Variation** or **Notified UCLS**. I refer to the Upper Clutha Landscape Schedules as the **UCLS** and I explain my involvement in this process in more detail shortly.

Site Visits

- 1.12** I have conducted site visits specifically in relation to the UCLS Variation in December 2022, totalling three days of field work. This included driving the public road network and walking public tracks, accompanied by Ms Helen Mellsop (peer reviewer) for part of the time.
- 1.13** In addition, for the PALS workstream, I undertook six days of field work in December 2021 and made additional site visits (three days) in late 2023 and early 2024 as part of my preparation for the PALS Variation Council-level hearing. Again, this included driving the public road network and walking public tracks and involved

5 With planners: Messrs Barry Kaye and Kelvin Norgrove.

a degree of overlap with the field work relevant to the UCLS Variation, given the proximity of many of the UCLS areas to the PALS areas.

1.14 More recently, I have visited the Upper Clutha Basin on numerous occasions in both a landscape expert⁶ and recreational capacity. While I consider that I have a reasonably up-to-date knowledge of the area, I reserve the opportunity to visit specific areas where development change that may influence landscape values is raised in submitter evidence, prior to finalising my rebuttal evidence.

1.15 For completeness, I have not visited private properties specifically in relation to the UCLS. This is considered appropriate given that the Schedules relate to a geographically defined 'area' rather than any specific 'site'. I describe the background to the mapping of the UCLS areas in more detail in **Section 4** of my evidence.

Code of Conduct

1.16 Although this is a Council Hearing, 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. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

2. SCOPE OF EVIDENCE

2.1 My evidence is structured to:

- (a) provide a short summary of the background to the development of the UCLS Variation (including the mapping of the UCLS areas in the PDP e-plan maps) (**Section 4** of my statement of evidence);

⁶ For example, in connection with several peer reviews for resource consents in the Upper Clutha Basin; Rural Visitor Zone appeals; and rural subdivision resource consent appeals.

- (b) briefly summarise the methodology applied in the preparation of the UCLS Variation (**Section 5** of my statement of evidence);
- (c) discuss repeated landscape related themes identified in the submissions (ordered by theme topic) (**Section 6** of my statement of evidence);
- (d) comment on landscape related submissions for the UCLS Variation (ordered by Schedule) and make recommendations with respect to amendments to the notified Schedules (**Section 7** of my statement of evidence); and
- (e) summarise the changes that have been made to the individual Schedules and associated mapping to ensure that they align with the structural approach of the Existing PALS (**Section 8** of my statement of evidence).

2.2 The Schedules that my evidence addresses are as follows:

PA Schedule (relates to ONF)

21.22.25 Mata-au Clutha River.

Non-PA Schedules (relates to RCL)

21.23.6. East of Wānaka – Mount Aspiring Road.

21.23.7. Studholme Road.

21.23.8. Riverbank Road.

21.23.9. Wānaka Airport Environs.

21.23.10. Northern End of Criffel and Pisa Range Foothills.

21.23.11. East of Luggate.

21.23.12. Sheepskin Creek.

21.23.13. Kane Road and Luggate – Tarras Highway.

21.23.14. Hāwea Moraine.

21.23.15. Hāwea Basin.

21.23.16. Crosshill.

21.23.17. Quartz Creek and Maungawera.

2.3 I attach to my evidence:

(a) **Appendix 1: Landscape Comments Tables** (ordered by Schedule). I set out my specific responses to landscape-related submissions on each specific schedule. This appendix is also where I list the specific submitters / submission numbers (whereas in the body of my evidence I discuss the themes more generally, cross referencing to examples of submissions in relation to each theme); and

(b) **Appendix 2: Documents relied on.**

2.4 Appendix 1 to the s42A Report contains a marked-up version of the Notified UCLS that shows the text changes that I recommend in response to submissions.

2.5 The s42A Report also includes a link to the QLDC e-Plan mapping for the UCLS Variation and pdf maps.

Interrelationship between my landscape evidence and Ms Frew's planning evidence

2.6 The preparation of the UCLS Variation and review of submissions on the UCLS Variation involves a combination of technical landscape and planning expertise. Technical landscape expertise focuses on:

(a) the identification and evaluation of the important landscape attributes and values that contribute to the outstanding-ness of the 21.22.25 Mata-au Clutha River ONF and the landscape character and visual amenity values of the Schedules that correspond to Rural Zone land in the Upper Clutha Basin that is identified as RCL;⁷ and

(b) the evaluation of landscape capacity within each Schedule area for a range of specified land uses, noting that this is informed by planning input as to the relevant zones and provisions.

⁷ It should be noted that RCL is not identified as a distinct landscape overlay in the PDP mapping but applies to all Rural Zone land that is not ONF or ONL. Refer PDP 21.1 Zone Purpose.

2.7 The technical planning expertise is explained in the s42A Report prepared by Ms Emily Frew.

2.8 My expert input has focussed on the following:

- (a) Review of the landscape related submission points that are relevant to the specific Schedule areas (refer **Appendix 1**);
- (b) Providing expert landscape advice with respect to recommended changes to the (relevant) 'Response to Submissions Version' of the Schedules attached to the s42A Report;
- (c) Review of the submission points relevant to the landscape assessment methodology and more general landscape matters;
- (d) Review of the Schedules and associated mapping to ensure that they align with the structural approach of the PALS; and
- (e) Providing expert landscape advice with respect to recommended changes to the Response to Submissions Version of the Schedule 21.23 Preamble attached to the s42A Report.

2.9 The fact that I do not specifically refer to or address an aspect of a submission does not mean that I have not considered it, or the subject matter of that submission, in forming my opinion regarding the landscape appropriateness of the amendment(s) sought.

3. EXECUTIVE SUMMARY

3.1 My evidence explains the background to the preparation and notification of the UCLS Variation, including the UCLS mapping and the landscape assessment methodology underpinning the UCLS. In particular, the UCLS build on the outcomes of the PALS Variation process and reflect the approach of the Existing PALS with respect to schedule structure and content, and the mapping approach (all of which has been confirmed by the Environment Court).

- 3.2** My evidence responds to submissions seeking amendments to the UCLS text, in relation to landscape attributes and values and landscape capacity, I have recommended a number of changes to the UCLS. My recommended changes also include error corrections and minor text changes to align with the Existing PALS approach. These are annotated in the **s42A Version of the PA Schedules**.
- 3.3** Where I do not agree with a submission point (relevant to landscape matters), I have recorded my reasons in the **Landscape Comments Tables in Appendix 1**.
- 3.4** Many of the UCLS submissions raise a number of repeated or common themes, and so I have structured the main body of my evidence to address these more general matters. As noted above, my more specific response to submissions (including on the content of the PA Schedules) is provided in **Appendix 1**.

4. BACKGROUND TO THE UCLS VARIATION

- 4.1** The background to the UCLS Variation is generally outlined in the Section 42A Report (and the Section 32 Report). However, I also include some background here to assist with the landscape background.
- 4.2** In summary, the UCLS Variation proposes to introduce one PA Schedule (that relates to the Mata-au Clutha River ONF) and twelve non-PA Schedules that relate to RCL land in the Upper Clutha Basin.

Mata-au Clutha River PA Schedule 21.22.25: Background, Mapping, Policy Context and Structure

- 4.3** As explained in the Methodology Report attached to the Section 32 Report, the Mata-au Clutha River PA was originally intended to be notified as part of the PALS Variation. However, Council was directed by the Environment Court to amend the PDP maps to categorise the Mata-au Clutha River as an ONF (not an ONL) and to amend the ONF boundary so that it reflected the escarpments on either side of the river.⁸

⁸ *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2022] NZEnvC 244.

- 4.4** This direction was made at the same time as the PALS Variation was progressing, and led to delays in finalising the boundaries of the Mata-au Clutha River ONF and PA. This meant that it was not completed by the time the PALS Schedules were notified (as directed by SP 3.3.42) and would instead be notified as part of the UCLS Variation.
- 4.5** The mapped extent of the Mata-au Clutha River ONF was confirmed by the Environment Court in [2022] NZEnvC 244. This is shown in the QLDC ePlan mapping resource, as per all other ONF and ONL.
- 4.6** The PA Schedule mapping for the Mata-au Clutha River ONF aligns with the spatial extent of the ONF. The PA mapping is proposed to be included in the QLDC ePlan mapping resource, in the same way as all other PALS boundaries.
- 4.7** Consistent with the PALS Consent Determination issued by the Environment Court, which post-dated notification of this Variation, the Assessment Extent (outer boundary) and the Rural Zone (Rural Zone within the Assessment Extent) are proposed to be shown as separate layers in the QLDC e-Plan mapping resource.
- 4.8** The structure of the Mata-au Clutha River PA Schedule 21.22.25 derives from Strategic Policies 3.3.37, 3.3.38, and mirrors that of the other PALS already included in Chapter 21 – Rural Zone.⁹ The Schedule is organised to include:
- (a) A description of the landscape attributes and values that play an important role in shaping landscape values and contribute to the ‘outstanding-ness’ of the PA (ONF). This part of the PA Schedule is referred to as the ‘main body’ of the schedule in my evidence.
 - (b) A summary and rating of landscape character and visual amenity values.
 - (c) A high-level evaluation of landscape capacity for a range of land use activities.

⁹ As directed in *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2021] NZEnvC 124 (**Decision 2.9**) Annexure 1.

Non-PA RCL Schedules: Background, Mapping, Policy Context and Structure

- 4.9** The Assessment Extent (outer boundary) of the non-PA RCLs and the Rural Zone non-PA RCLs (non-PA RCLs that are within the Rural Zone) are recommended to be shown as separate layers in the QLDC e-Plan mapping resource (consistent with the mapping approach used in the PALS that has been confirmed by Environment Court, compared to the notified maps that contained the UCLS in a single layer).
- 4.10** As explained in the Methodology Report, the delineation of the UCLS Schedule areas were defined by Ms Helen Mellisop and I. In many instances, the extent of the mapped areas has been determined by the PDP Rural zoning/RCL boundaries, surrounding PDP zoning patterns and/or confirmed boundaries of PA RCLs, PA ONF/Ls and other PDP ONF/L areas. This means that some of the non-PA UCLS areas form a discrete ‘pocket’ of RCL (eg 21.23.6, 21.23.7, 21.23.8, 21.23.9, 21.23.10, 21.23.11, 21.23.12, 21.23.16 and 21.23.17).
- 4.11** In the case of the non-PA Schedule areas on the eastern side of the Hāwea River and Mata-au Clutha River, in some locations, landform patterning has informed the ‘internal’ delineation of the boundaries between 21.23.13, 21.23.14 and 21.23.15 (ie the configuration of the non-PA Schedule areas in this part of the Upper Clutha Basin). It is acknowledged that the absence of detailed contour information in this part of the District has made defining the boundaries between the non-PA Schedule areas difficult in places (and in particular, in relation to the northern and southern edges of 21.23.14 Hāwea Moraine). It is noted that there are no specific submissions querying the boundaries between the non-PA Schedule areas, including in relation to 21.23.14.
- 4.12** It is noted that the UCLS Variation is not required to address the merits or otherwise of the underlying RCL classification itself, as this has been confirmed through the Queenstown Lakes District Plan Review process – in particular, through submissions and decisions on Stage 1 of the process, and the Topic 2 decisions cited in Appendix 2. Further, that process has determined that the RCL areas of the district correspond to a s7(c) RMA amenity landscape.¹⁰

¹⁰ *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2019] NZEnvC 205.

- 4.13** In addition, the mapped extent of a non-PA UCLS ‘scheduled area’ is not a ‘landscape’ in its own right and typically forms part of a broader landscape. This is reflected for the Existing PALS in the Preambles (21.22, 21.23), which explain that the defined areas are not a complete landscape, but an area that has been mapped as representative for the purposes of the Existing PALS process. The same approach has been adopted for the UCLS Variation, with the identified non-PA areas comprising land that forms part of a wider RCL landscape.
- 4.14** For methodological consistency and transparency, the non-PA Schedules have been structured and prepared in the same way as the Existing PALS, using the three dimensions of landscape: physical, associative, and perceptual (or sensory) described above. This is established and accepted by the New Zealand Institute of Landscape Architects as best practice, as articulated in TTatM.
- 4.15** This approach reflects the fact that all landscapes (and not just Aotearoa’s very high value landscapes), are the ‘result’ of the collective interaction of these three dimensions of ‘landscape’.
- 4.16** For completeness, there are a small number of RCL areas in the Upper Clutha Basin that have not been addressed in the PA Schedules or the UCLS Variation. These are the fragments of RCL land surrounded by urban zoned land in Wānaka, around the edges of Mount Iron PA (ONF), along the margins of Orau (Cardrona River) and between the urban edge and Mata-au (Clutha River) PA (ONF) adjacent Outlet Road and Aubrey Road. This is because the RCL fragments generally relate to individual sites, land that is subject to an Environment Court proceeding, or sites where a designation applies.
- 4.17** Schedules have also not been prepared for the RCL land in proximity to Jacks Point. This is because the focus for the current Variation is the Upper Clutha Basin. It is also noted that the Jacks Point area is the subject of a detailed spatial planning review by QLDC, and parts to the south (at Homestead Bay), are now subject to a Fast track consent.

Relationship between the PA Schedules and the UCLS

- 4.18** The initial preparation of the content of the UCLS was progressed after the completion of the PALS Council-level hearing process. This allowed the UCLS to integrate the relevant ‘amendments’ agreed in the PALS expert conferencing (for the Council level hearing), along with amendments recommended by the Panel. Put another way, the initial drafting of the UCLS ‘built’ on and aligned with the learnings and outcomes of the PALS process and decisions.
- 4.19** The Council has since had the opportunity to further revise the approach to the UCLS, so that it can draw on the structural and merits changes made through the Environment Court appeal process on the PALS.
- 4.20** This is explained in **section 8**, which outlines the refinements that have been made to the s42A version of the UCLS to ensure that they align with the PDP PALS (particularly those settled by the Environment Court).

Land uses for UCLS Capacity Evaluation

- 4.21** For methodological consistency and transparency, the UCLS generally address the same range of land uses to those referred to in the PA Schedules.¹¹ This means that the range of land use activities identified for the UCLS landscape capacity evaluation derives from the lists in PDP 3.3.38(c) and 3.3.41(g).

5. UCLS: METHODOLOGY

- 5.1** The landscape assessment methodology that underpins the UCLS Variation is set out in the Methodology Report attached to the Section 32 Report. By way of summary, the Methodology Report includes:

- (a) An outline of the approach taken to the identification and evaluation of **landscape attributes and values** in the UCLS.

¹¹ There are a small number of additional land uses addressed in some of the PA Schedules where relevant, such as jetty and moorings in the Roys Bay PA.

- (b) An explanation of how **landscape capacity** is evaluated in the UCLS.
- (c) An explanation of the link between the UCLS and the District Plan Policy Framework.
- (d) A description of the **landscape assessment ‘method’ (or ‘process’)** that has been used to complete the UCLS. This includes:
 - (i) a description of **other expert inputs** into the preparation of the UCLS;
 - (ii) an explanation of how **associative values** have been addressed;
 - (iii) an explanation of how **perceptual values** have been addressed;
 - (iv) other information sources relied on;
 - (v) the UCLS templates;
 - (vi) a description of the **field survey**;
 - (vii) a summary of the **peer review process**;
 - (viii) the delineation of ‘landscape character units’ within PAs;
 - (ix) the **data sources** that have been relied on;
 - (x) any **assumptions** that have underpinned the preparation of the UCLS; and
 - (xi) the **step-by-step process** that has been used to complete the work.

5.2 It is well established (and goes without saying) that ‘landscape’ affects us all, with most people having an interest in landscape to at least some degree and that non-landscape experts have an important role in framing landscape values. As TTatM explains: ... *everyone experiences landscapes and has heart felt views about them.*

5.3 TTatM¹² goes on to explain that the landscape expert’s role is to assist decision makers by: providing an objective account of relevant landscape facts against which to test others’ opinions; providing an unbiased and independent expert opinion against which the range of community views might be compared and analysed; and interpreting and explaining landscape matters that other participants may lack the training to articulate. TTatM also cautions against simply repeating other’s opinions as that would not be fulfilling the role of landscape experts in assisting decision makers.

12 See: *Te Tangi a te Manu* [2.2] to [2.5].

5.4 In summary, the evaluation of landscape attributes and values is a complex process, requiring community input and careful expert judgement.¹³ The complexities of this process and requirement for judgement are acknowledged in TTatM and draw from an extensive body of case law.¹⁴ I confirm that an expert assessment approach, informed by community input,¹⁵ has informed the s42A Version of the Schedules appended to Ms Frew's s42A Report.

6. DISCUSSION OF THE MORE GENERAL LANDSCAPE THEMES RAISED IN SUBMISSIONS

6.1 This section of my evidence addresses the broader or 'bigger picture' landscape related themes raised in submissions, ordered by topic:

- (a) Issues raised by submissions in relation to aspects of the mapping across all of the UCLS are addressed in **Theme 1: Mapping Requests**.
- (b) Issues raised by submissions in relation to the Preambles are addressed in **Theme 2: Schedules Preambles**.
- (c) Submissions in relation to text changes for the main body of the Schedules are addressed in **Theme 3: Schedules Text Changes**.
- (d) Submissions relevant to the landscape capacity portion of the UCLS are addressed in **Theme 4: UCLS Landscape Capacity**.

6.2 No technical landscape evidence has been provided in support of submissions, although I note that this is not particularly unusual at this stage of a Variation process.

13 For example, see TTatM: [4.21].

14 For example, see *Western Bay of Plenty District Council v Bay of Plenty Regional Council and others* [2019] NZEnvC 110 ('Matakana Island Second Decision') [26].

15 Which included preliminary consultation in early 2022 and a thorough review of landscape related submission points.

THEME 1: MAPPING REQUESTS

Mapping Changes recommended by Council experts

- 6.3** Neither Ms Frew nor I recommend any mapping changes to the UCLS areas in response to submissions.
- 6.4** As explained above, there are minor mapping refinements that I recommend to ensure that the UCLS mapping aligns with the Existing PALS mapping approach, which I explain in **section 8**.

Submissions seeking changes to the non-PA UCLS Mapping

- 6.5** Some submissions¹⁶ request that part, or all of a site, or a particular portion of a non-PA mapped area is excluded (by way of mapping amendments) from the mapped Schedule area. This relief is typically sought on the basis of the level of modification evident in part or all of a site (often associated with farming practices or rural living type development), variances in the landscape characteristics of a site or localised area within the non-PA mapped area and/or, what might occur in the future following the development of alternative land use practices (such as different ways of farming).
- 6.6** Other submissions seek expansion of the non-PA UCLS area, on land that is not identified as RCL in the PDP.
- 6.7** The RCL status of the mapped areas have been confirmed through the PDP Plan Review process as outlined above. Ms Frew's s42A Report addresses in more detail, the matter of scope in relation to submissions seeking changes to the RCL categorisation of land through the UCLS.
- 6.8** In my opinion, there is nothing, from a landscape perspective, that differentiates these properties, or parts of the mapped non-PA UCLS areas from the balance of the mapped non-PA UCLS area.

¹⁶ For example, see OS7.1, OS30.3, OS35.2.

6.9 Further, it is widely acknowledged and accepted that within a rural landscape area, there can be variances in landscape characteristics (ie landscape attributes and values) across the relevant area. In my opinion, the 21.22 and 21.23 Preambles¹⁷ fairly acknowledge such variances which may emerge and be of relevance in a detailed, proposal-specific, landscape assessment.

6.10 I therefore do not recommend that the extent of any non-PA Schedule mapped area be amended (which is detailed further in Appendix 1 attached to my evidence in relation to specific submissions).

Request that the RCL land near Mount Iron ONF continues to be excluded from the UCLS

6.11 One submitter¹⁸ requests that the RCL land near Mount Iron continues to be excluded from UCLS.

6.12 The Methodology Report explains at paragraphs 1.19 and 1.20 that there are a small number of RCL areas in the Upper Clutha Basin that have not been addressed in the PA Schedules or the UCLS and goes on to explain that this is because the RCL fragments generally relate to:

- (a) individual sites or a very small number of grouped sites (and therefore, is little benefit to plan users providing a schedule of landscape values for the area, as a site-specific landscape assessment would be required for any future plan change or resource consent application);
- (b) land that is subject to appeal in the Environment Court; or
- (c) sites where a designation applies.

6.13 At the time of preparing my evidence, it is my understanding that (a) above applies in relation to the RCL at the base of Mount Iron ONF. I note that this area is currently also subject to a Fast-track consent application for the Mt Iron Junction Housing Scheme.

¹⁷ For example, see 21.23 Preamble paragraphs 4.1 and 4.2.

¹⁸ OS13.

- 6.14** For these reasons, I continue to support the exclusion of the RCL fragment at the base of Mount Iron ONF from the UCLS, consistent with the submission.
- 6.15** For completeness, at the time of notification of the UCLS, there was a sliver of RCL along the western side of Sticky Forest. That sliver has been rezoned to an urban zone and for this reason I continue to support the exclusion of the previous RCL sliver near Sticky Forest from the UCLS.
- 6.16** I note that a pocket of RCL land remains to the south of Sticky Forest (within the Kirimoko ‘neighbourhood’) and I consider that it aligns with the characteristics of comprising parts of a small number of grouped sites. For this reason, I consider it to be of little benefit to plan users to provide a schedule of landscape values for the area, as a site-specific landscape assessment would be required for any future plan change or resource consent application.

THEME 2: SCHEDULES PREAMBLES

- 6.17** A number of amendments are recommended in the **s42A Version of the Preamble to Schedule 21.23** (attached to Ms Frew’s s42A Report) to address specific matters raised by submitters, align with the PDP 21.23 Preamble as settled by the Environment Court, and to assist plan users more generally.
- 6.18** I confirm that I support these changes from an expert landscape perspective.

Range of Land Uses addressed in the UCLS

- 6.19** Some submissions query the range of land uses listed in the Capacity section of the UCLS,¹⁹ including commenting that over the life of the PDP, ‘other’ land uses may be contemplated in a Schedule area.
- 6.20** As explained earlier, for methodological consistency and transparency, the UCLS generally address the same range of land uses to those referred to in the PA

¹⁹ For example, see OS 28.7.

Schedules. This means that the range of land use activities identified for the UCLS capacity evaluation derives from the lists in PDP 3.3.38(c) (for the ONF) and 3.3.41(g) (for the non-PA RCL).

- 6.21** However, this is an understandable issue and was traversed in the PALS (Council level) hearing. Through that process, and the PALS appeal process, amendments were made to the 21.22 and 21.23 Preambles to explain that the Schedules correspond to a point in time and are not intended to lock in existing land uses, at least in part, in response to this issue. This approach has been carried through in Ms Frew's s42A Report.
- 6.22** For these reasons, and from a landscape perspective, I do not consider that any further changes to the UCLS are required in this regard.
- 6.23** This matter is also addressed in Ms Frew's s42A Report.

Land Use Definitions

- 6.24** A small number of submissions²⁰ seek clarification of the definition of land uses listed in the Capacity section of the UCLS defined in paragraph 6 of the 21.23 Preamble, or that new definitions may be required to provide for the intent of capacity in landscapes with different ability to absorb appropriate development.
- 6.25** The land use definitions were the subject of discussion through the PALS hearing process, with expert planning and landscape conferencing supporting the Decisions Version of the 21.22 and 21.23 Preambles in this regard. The general approach of the Decisions Version of the Preambles has been carried through in the PDP 21.22 and 21.23 Preamble text for the Existing PALS (which was confirmed by Environment Court Consent Orders), with a small number of refinements made (as described in Ms Frew's s42A Report), that I understand are intended to improve clarity.

²⁰ For example, see OS30.26.

6.26 From a landscape perspective, I consider it important that a consistent approach to land use definitions is applied between the PA and non-PA Schedules to assist plan users. I note that this matter is also discussed in Ms Frew's s42A Report.

6.27 With respect to the submission by Hawthenden Trust (#30) that new definitions may be required to provide for the intent of capacity in landscapes with different ability to absorb appropriate development, I am unclear on the meaning of the submission. The submitter is encouraged to provide further clarification on this point in their evidence for Council to consider.

THEME 3: SCHEDULES TEXT CHANGES

General Comments

6.28 Detailed landscape comments in response to landscape related submission points relevant to each UCLS are attached in **Appendix 1**, with recommended changes to the UCLS set out in the s42A Version of the UCLS attached to **Ms Frew's s42A Report**. Where a submission point is accepted in full, or in part, the landscape assessment work that underpinned the development of the UCLS, my consideration of the specific matter and the reasoning provided in the submission (along with, in some instances, other landscape assessment work in the relevant area) has informed that recommendation.

6.29 As explained earlier, it is well established that 'landscape' affects us all, with most people having an interest in landscape to at least some degree and that non landscape experts have an important role in framing landscape values. However, the evaluation of landscape attributes and values is a complex process requiring expert judgement and draws from an extensive body of case law. This means that without the guidance of expert landscape advice, many of the text changes sought in submissions run counter to best practice landscape assessment. That said, several submission points reflect the more detailed knowledge that submitters have of their land or a local area and have been recommended for inclusion in the UCLS.

Submissions that support the Schedules text

- 6.30** Many submissions support (at least in part), the text of the UCLS as notified.²¹ This suggests support for the methodology that underpins the Schedules, as well as their structure, content, and level of detail.
- 6.31** As explained in relation to other relevant submission themes (and the detailed submission points set out in **Appendix 1: Landscape Comments Tables**), amendments have been made to the UCLS in response to other matters raised in submissions where they are supported by expert planning, landscape as well as, where appropriate, to reflect the more detailed knowledge that submitters have of their land as aforementioned.

Te Reo Corrections

- 6.32** Corrections have been made to Te Reo misspellings where requested.

Typographical Corrections

- 6.33** A small number of minor typographical corrections have been made throughout the UCLS: in response to submissions; to improve the understanding of the text; or to correct errors (eg misspellings, missed words).

Schedules should be amended to give greater recognition to farming and not lock in existing land uses etc

- 6.34** A reasonably common theme in submissions²² is the request to record greater recognition of farming's past, present and/or future role in shaping landscape and rural character, and that farming practices should not be locked into a particular set of landscape values that will cause increased regulatory burden and limit the extent to which farmers can operate efficiently and effectively. Closely related to

21 For example, see OS1.20, OS28.1, OS46.1, OS46.3, OS46.5, OS5.2, OS5.3, OS5.4, OS5.5, OS5.7.

22 For example, see OS42.7, OS42.8, OS42.9, OS42.10.

this theme is a more general query that the UCLS should not ‘lock in existing land uses’.

- 6.35** The role of past and present farming practices in shaping landscape values is acknowledged (where relevant) under the **Physical Attributes and Values** section of the UCLS, typically under the ‘Important ecological features and vegetation types’ sub-header (see ‘other distinctive vegetation types’) and the ‘Important land-use patterns and features’ sub-header. Where appropriate, the role of historic farming practices is referenced in the **Associative Attributes and Values** section of a Schedule, under the ‘Important historic attributes and values’ sub-header. In addition, the role of farming patterns and characteristics is referenced in the **Perceptual Attributes and Values** under the ‘Particularly important views to and from the area’ and ‘Naturalness’ sub-headers.
- 6.36** Relying on Ms Frew’s s42A Report, I understand that the permitted activity status for farming in Chapter 21 is not altered by the UCLS (nor is any activity status for any other activity in the PDP altered as the land is already RCL), and it is only when a consent application for a restricted discretionary, discretionary, or non-complying activity is triggered (and where landscape considerations are relevant) that the UCLS will be engaged. Given the s6(b) or s7(c) nature of the UCLS, I consider this to be an appropriate framework that recognises that there is a place for permitted and controlled activity farming in the Upper Clutha Basin.
- 6.37** As discussed earlier, the 21.22 and 21.23 Preambles already explain that the Schedules correspond to a point in time and are not intended to lock in existing land uses. This, at least in part, responds to these potential issues.
- 6.38** Further, the repeated references to landscape restoration and enhancing public access in the qualifying comments section of the Landscape Capacity section of each Schedule acknowledges some of the landscape benefits that can be associated with land-use change.
- 6.39** A further matter raised in relation to farming matters are submissions querying the absence of agricultural and horticultural expertise in the drafting of the UCLS.

- 6.40** In my experience of district-wide landscape assessments of this nature, it is typically only the districts with very high agricultural or horticultural production capacity where such advice is integrated into a schedule of landscape values, or shapes landscape-related capacity comments.
- 6.41** An example of where this might have occurred (although has not), are parts of the former Franklin District in Auckland which is very highly valued for horticultural production due to its high-quality soils, frost-free nature, availability of water, and proximity to market. I do not understand the Queenstown Lakes District to have horticultural or agricultural production characteristics of this nature, and do not consider there to be a clear need for expert advice of this nature.
- 6.42** This matter is also addressed in the s42A Report.

Amend UCLS to delete reference to some of the landscape values listed in the Schedules

- 6.43** Several submissions²³ request the deletion of reference to a ‘type’ of landscape value in a UCLS. For example, deletion of reference to: certain ecological values, ‘mana whenua values’; ‘transient values’; ‘heritage values’; views from private and public places; or ‘shared and recognised values’.
- 6.44** The Methodology Report (paragraph 2.10) sets out the well-established factors that are often considered under the dimension of ‘landscape’.²⁴ All of the factors listed in the UCLS draw from the list.
- 6.45** For these reasons, I do not consider it appropriate to delete such factors from the UCLS where they apply in a specific case as a matter of fact.

23 For example, see OS16.3, OS43.4, OS 43.6.

24 Deriving from TTatM paragraph 4.29 and, in turn, case law. For example, see *Upper Clutha Tracks Trust v Queenstown Lakes District Council* [2010] NZEnvC 432 – Interim Decision [50].

Amend the Schedules to recognise and provide for existing uses, their upgrade, replacement, or redevelopment etc

- 6.46** Some submissions²⁵ have requested that the Schedules should recognise and provide for existing uses, their upgrade, and their replacement or redevelopment.
- 6.47** The UCLS have been amended where appropriate to acknowledge existing uses in response to submissions.
- 6.48** With respect to the suggestion that the UCLS should recognise and provide for the upgrading of existing uses, their replacement, or development; this goes beyond the identification of the landscape values of the area and the landscape capacity of the area as a whole.
- 6.49** Further, it does not always follow that the replacement or upgrade of an existing structure or use will protect or maintain/enhance landscape values. For this reason, it is fitting that the appropriateness or otherwise of such development change is addressed via a detailed assessment, as signalled in the Preambles to Schedules 21.22 and 21.23.

Amend 21.22.25 Mata-au Clutha River to acknowledge sites within the mapped PA that are not considered sufficiently natural to be outstanding, do not display the values mentioned in the schedule or have a different landscape capacity

- 6.50** Some submissions request that PA Schedule 21.22.25 Mata-au Clutha River is amended to acknowledge that some sites are not considered sufficiently natural to be outstanding,²⁶ do not display the values mentioned in the schedule²⁷ or merit specific reference of a different landscape capacity for some land uses in relation to a specific property.²⁸

25 For example, see OS30.10.

26 For example, see OS36.9.

27 For example, see OS36.10 and, 36.11.

28 For example, see OS 39.10.

- 6.51** The submitters' land forms part of the broader landscape feature that has been identified by the Environment Court as an ONF. Further, it is widely acknowledged and accepted that within an ONF (or ONL), there can be varying degrees of landscape values across the relevant area.
- 6.52** Also of importance in considering this submission theme, is the acknowledgement in the Schedule 21.22 (and 21.23) Preambles that site-specific assessments will need to assess and rate the relative values present on a site and landscape capacity as part of a resource consent application. In my opinion, this allows for a site-specific assessment to identify different landscape values and, potentially, landscape capacity, as part of a resource consent process, including potentially identifying those values in 21.22.25 that are not relevant to the site specific assessment.
- 6.53** Further, it is noted that this issue was raised in the PALS hearing and appeal process and the Existing PALS do not adopt the approach requested in this regard.
- 6.54** For these reasons, I do not consider that any changes to 21.22.25 are required in this regard.

Amend the RCL UCLS to specifically exclude specific properties

- 6.55** In a similar vein, some submissions²⁹ request that UCLS that apply to RCL areas are amended to exclude specific properties.
- 6.56** For the reasons outlined above and in Appendix 1, I do not consider that such changes are appropriate from a landscape perspective.

29 For example, see OS30.1, OS26.2, OS36.2, OS37.1, OS25.14.

THEME 4: UCLS LANDSCAPE CAPACITY

Submissions that support the landscape capacity ratings in the UCLS

- 6.57** Several submissions³⁰ support the capacity ratings in the UCLS as notified more generally, or for specific land uses. This suggests support for the methodology that underpins the UCLS, their structure, content and level of detail and the approach to landscape capacity assessment.
- 6.58** As explained in relation to other relevant submission themes (and detailed submission points set out in **Appendix 1: Landscape Comments Tables**), amendments have been made to the UCLS in response to other matters raised in submissions where they are supported by expert planning and landscape advice.

Delete landscape capacity ratings from the UCLS

- 6.59** Several submissions³¹ seek that the landscape capacity ratings are deleted from the UCLS as they are too conclusive or incorrect.
- 6.60** An evaluation of landscape capacity is a requirement of Chapter 3 for the PA Schedules.³² For this reason, I understand that there is no ability to accept the deletion of landscape capacity ratings in relation to 21.22.25 PA Mata-au Clutha River.
- 6.61** In terms of the non-PA UCLS, the Methodology Report at paragraph 1.5 explains that although the areas of RCL addressed in UCLS are not specifically addressed in Chapter 3 of the PDP in the way that the Priority Areas are, a consistent approach to the evaluation of landscape values and landscape capacity to that required for the PA RCL areas of the district has been applied for the non-PA RCL areas. This matter is addressed in more detail in Ms Frew's s42A Report.
- 6.62** The Methodology Report goes on to outline (at paragraph 1.18) that the UCLS workstream has been progressed after the completion of the PALS Variation

30 For example, see OS24.4, OS25.13.

31 For example, see OS8.15, OS28.3.

32 See PDP 3.3.38(c).

hearing process. That allowed the UCLS to integrate the relevant ‘amendments’ agreed in expert conferencing, along with amendments recommended by the Independent Hearings Panel for the PALS hearing (ie the Decisions Version of the PA Schedules). Put another way (and as mentioned earlier), the drafting of the UCLS ‘builds’ on the learnings and outcomes of the PALS Variation process. This includes the application of a consistent approach to the rating and qualifying comments in relation to landscape capacity across the UCLS. For completeness, I note that the Existing PALS (as confirmed by Environment Court), do not alter the approach to rating landscape capacity in the Decisions Version of the PALS.

6.63 Further, as explained earlier, the Preambles to Schedules 21.22 and 21.23 clearly signal that: the capacity ratings are high level; apply at a Schedule area level as a whole; and should not be taken as prescribing the landscape capacity of specific sites. The Preambles also explain that a finer grained site-specific assessment will be required for a plan change or resource consent process which may identify different landscape attributes, values, and capacity to that identified in the Schedule.

6.64 In my opinion, this ‘starting point’, in combination with the need for methodological consistency across the PDP 21.22 and 21.23 Schedules means that no changes are required in this regard.

Amend UCLS landscape capacity ratings to remove reference to ‘no’ landscape capacity

6.65 Several submissions³³ seek deletion of the term ‘no’ in the lowest landscape capacity rating (ie ‘extremely limited or no’ landscape capacity).

6.66 This matter was traversed at length in the PALS hearing process, with the landscape experts agreeing that in some circumstances (both in terms of the land use and landscape context), some land uses may be inappropriate, meriting a rating of ‘no’ landscape capacity. Again, I note that the Existing PALS (confirmed by Environment Court), do not alter this terminology for the lowest landscape capacity rating.

33 For example, see OS32.10, OS28.6, OS25.7, OS25.8.

- 6.67** It is also important to note that landscape capacity in the UCLS is evaluated at a Schedule area level rather than a site-specific level and is intended as guidance only, as explained in the 21.22 and 21.23 Preambles. Further, the Preambles acknowledge that a site-specific (ie finer grained) landscape assessment as part of a resource consent may identify a different landscape capacity rating for a land use.
- 6.68** The deliberate incorporation of the term ‘extremely limited or no’ in the lowest landscape capacity rating terminology (emphasis added), effectively leaves the door ajar for a proposal-specific assessment (as signalled in the Preambles) to identify a different landscape capacity to ‘no’ that enables the development being considered. It should also be noted that this landscape capacity rating is applied relatively sparingly across the UCLS that apply to RCL land in recognition of the different landscape sensitivity of these parts of the district compared with ONF/L land (for example, it typically only applies to ‘urban expansion’ and ‘tourism related land uses’ (ie resort development)).
- 6.69** For these reasons, no changes to the UCLS are considered necessary in this regard.

Amend UCLS landscape capacity definitions

- 6.70** Some submissions³⁴ appear to query the landscape capacity definitions. With the exception of the lowest landscape capacity rating (‘extremely limited or no’ landscape capacity), the landscape capacity rating definitions were agreed by the landscape experts during the PALS council-level hearing process and have been carried through, unchanged by appeals, into the Existing PALS and Preambles (as confirmed by the Environment Court). While there were amendments to the lowest landscape capacity rating definition throughout the PALS Council hearing process, the definition used in the UCLS is the same as that used in the Existing PALS (which has been confirmed by the Environment Court).
- 6.71** I continue to support the notified wording of the lowest landscape capacity rating definition.

³⁴ For example, see OS30.24.

6.72 To assist an understanding of my reasoning in this regard, I set out the UCLS landscape capacity rating definitions below:

Some landscape capacity: typically this corresponds to a situation in which a careful or measured amount of some 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 limited 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 limited amount of sensitively located and designed development is likely to be appropriate.

Extremely limited landscape capacity: 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 limited amount of very sensitively located and designed development is likely to be appropriate.

Extremely limited or no capacity: typically this corresponds to a situation in which the landscape is extremely close to, or already at, capacity to accommodate development of this type without material compromise of its identified landscape values, and where either no, or an extremely limited amount of very sensitively located and designed development is likely to be appropriate.

6.73 Noting the challenge of defining landscape capacity for a wide range of land uses, within geographic areas of quite widely varying scale, the proposed definitions are deliberately structured in a similar way to establish a degree of consistency in the characterisation and evaluation of landscape capacity.

Amend the UCLS to be more directive as to where development can or cannot be absorbed in an area and/or more explicit with respect to the scale of development that is appropriate

6.74 Some submitters³⁵ have expressed a view that specific locations on their land or in discrete parts of a Schedule area be identified in the UCLS, as locations where development can be absorbed. Others go on to request that the UCLS state explicitly the scale of development that would be appropriate in those areas.

6.75 In my experience, identifying locations where development can be successfully absorbed on a site-by-site basis amounts to a structure planning exercise which is beyond the scope of the UCLS Variation.

6.76 However, where appropriate, the UCLS seek to identify more discrete parts of a Schedule area that are better suited to absorbing new development to assist plan users. For example, the recommendation that rural living development is set well back from roads or adjacent ONFs (where relevant) or in specific locations within a UCLS area.

6.77 In some UCLS areas or for other land uses, it is not possible to identify discrete locations where development is likely to be more successfully absorbed due to the similarity in the landscape sensitivity of the area in question, and/or the grain of landscape analysis that is implicit in a schedule of landscape values as part of a District Plan Variation (rather than a landscape assessment as part of a location-specific, resource consent or plan change application).

35 For example, see OS4.21, OS9.7.

6.78 In a similar vein, determining the exact scale of development that might be appropriate to an area would require a very fine-grained landscape analysis that is beyond the scope of the UCLS.

6.79 However, this is not to say that there will be no locations where development can be successfully absorbed in the UCLS area.

6.80 For these reasons:

(a) The UCLS set out the characteristics that are likely to support appropriate development in each area as a 'cue' for plan users contemplating resource consent or plan change applications.

(b) It is explicitly stated in the 21.22 and 21.23 Preambles that the landscape attributes, values, and capacity relate to the Schedule area as a whole and should not be taken as prescribing the attributes, values, and capacity of specific sites.

(c) It is explicitly stated in the 21.22 and 21.23 Preambles that a finer grained site-specific assessment will be required for a resource consent process which may identify different attributes, values, and capacity to that identified in the UCLS.

(d) To the extent that some submitters are seeking more detailed, site specific descriptions of where there may be capacity for development on certain sites, this would be counter to the approach taken when preparing the PA and non-PA UCLS, and lead to a level of information that would create inconsistencies across Schedules.

6.81 Therefore, I do not consider that any changes to the UCLS are required in this regard.

Delete landscape capacity section qualifying comments

6.82 Some submissions³⁶ request that the qualifying comments in the landscape capacity section of the UCLS are deleted. In effect, this relief is counter to the relief

³⁶ For example, see OS39.6, OS36.17, OS35.18.

discussed above, which seeks more information about capacity. The challenge is to find the right balance in terms of how capacity is expressed, so that it remains in keeping with the purpose and intent of the Schedules themselves.

6.83 I note that the PALS (confirmed by Environment Court), retain the landscape capacity qualifying comments and apply the same thinking that has been applied in the UCLS. For these reasons, I do not consider any changes re required in this regard.

Amend the UCLS Schedules to identify degradation and opportunities to remedy identified degradation and better acknowledge that landscape change can remedy past degradation

6.84 Some submissions³⁷ request that the UCLS are amended so that the landscape values and landscape capacity components of the Schedules identify degradation and opportunities to remedy identified degradation.

6.85 As explained above, the focus of the UCLS is to identify the existing landscape values that need to be protected or maintained/enhanced and provide a high-level indication of the landscape capacity of the Schedule area for a range of land uses.

6.86 That said, the identification of negative landscape aspects such as pest plants and animals, along with the reference to landscape restoration and enhancement in the discussion of landscape capacity for a range of land uses, signals the types of enhancement and remediation as part of development change that are likely to be appropriate within the Schedule area (noting that this is at a Schedule area level, rather than a site-specific level).

6.87 Ultimately it will be the plan policies that drive enhancement but, in my opinion, it is useful to note any particularly degraded values that could benefit from enhancement via future development proposals in the UCLS (such as the identification of Plant and Animal Pests). I would expect that such matters would

³⁷ For example, see OS36.23.

be traversed in detail as part of a detailed (and more site specific) landscape assessment in support of a plan change or resource consent process.

Amend the UCLS to acknowledge greater capacity for rural living development where such development exists

6.88 Some submissions³⁸ seek that the UCLS are amended so that landscape capacity ratings identify greater capacity for rural living development, where the area has already moved toward being influenced or dominated by rural living development.

6.89 The landscape capacity for rural living in each Schedule area has been evaluated in response to the landscape attributes and values of the specific Schedule area.

6.90 Further, it is methodologically incorrect to start from an assumption that where there is existing rural living, additional rural living will necessarily be appropriate. Particularly in the RCL areas where there tends to be a greater amount of existing rural living compared to PA ONF (or ONL areas), it can sometimes be the case that additional rural living may ‘tip the balance’ such that the rural area in question takes on the impression of a ‘landscape’ that is dominated by a rural lifestyle character (or even a ‘large lot’ or ‘spacious’ suburban character), rather than a landscape that retains rural character.³⁹ Such an outcome would not, in my view, align with the policy intentions of maintaining landscape character and visual amenity values and avoiding cumulative adverse effects.

6.91 For these reasons, no changes to the UCLS are considered necessary in this regard.

Amend the UCLS to consider future management and reflect that there will be future capacity

6.92 Some submissions⁴⁰ seek that the UCLS are amended to consider future management of the areas and reflect that there will be future capacity.

38 For example, OS9.6.

39 Within the context of the Upper Clutha RCL, rural character tends to be maintained when development: integrates with existing landscape patterns and elements; is visually discreet; maintains a sense of openness (where that is a relevant factor).

40 For example, see OS11.6, OS11.17, OS11.18.

- 6.93** To some extent, the landscape capacity sections of the UCLS provide guidance on the (appropriate) future management of a Schedule area where landscape capacity is identified for a land use activity, by framing the potential characteristics of such development. I am of the view that the extent to which the UCLS provide guidance in this regard is at an appropriate level, as going further than this would be speculative and is a matter to be worked through as part of future consenting processes.
- 6.94** With respect to the request that the UCLS should acknowledge that there will be future capacity (where the landscape values can be protected or maintained), this is implicit in the way the UCLS will be used (and also in the PDP policy direction, subject to landscape assessments confirming that (for example) landscape values for ONF will be protected). Further, as the 21.22 and 21.23 Preambles explain, the Schedules correspond to a point in time and acknowledge that capacity (and values) can change over time. This matter is also described in Ms Frew's evidence.
- 6.95** Further, the Preambles clarify that the UCLS Schedules do not replace any relevant policies, rules, or standards in the PDP and are intended to provide high-level guidance only, to assist the evaluation of future plan change and resource consent applications.
- 6.96** For these reasons, no changes to the UCLS are considered necessary in this regard.

Amend the UCLS capacity ratings for urban expansion

- 6.97** A number of submissions⁴¹ seek amendments to the landscape capacity ratings for urban expansion and/or deletion of reference to the Queenstown Lakes Spatial Plan (**QL Spatial Plan**) under this topic.
- 6.98** I consider that it is appropriate to signal that, where relevant, part or all of a Schedule area has been identified in the QL Spatial Plan in the interests of transparency. As explained in the Preamble, the UCLS correspond to a 'point in

41 For example, see OS4.20, OS11.21, OS29.8, OS19.1, OS29.11.

time' and it is therefore implicit that the appropriateness or otherwise of the urban development strategy expressed in the current Spatial Plan may change.

- 6.99** In terms of submissions seeking a change to the capacity rating for urban expansion, this typically corresponds to a request for a more permissive rating.
- 6.100** With respect to 21.22.25 applying the three-step test set out in *Rosehip*, urban development will typically undermine the identification/qualification of the feature as a natural landscape element, thereby compromising its fundamental classification as an RMA s6(b) feature. This issue was extensively traversed in the expert conferencing for the PALS workstream, where the experts agreed that within ONFs and ONLs, the appropriate landscape capacity rating for urban development is 'extremely limited or no' landscape capacity (and which has not changed through the PALS Consent Determination nor any Consent Orders).
- 6.101** Further, from a landscape perspective, it does not always follow that urban development is likely to be more appropriate along the edge of an ONF adjoining urban land, as the edges of a feature and the immediate interface of urban and ONF land can be more sensitive to development change in terms of protecting landscape values
- 6.102** For the non-PA 21.23 Schedules, urban development is inevitably transformative in terms of rural landscape character, and for this reason is deserving of very careful site-specific consideration in light of the policy context to maintain or enhance landscape character and visual amenity values. For these reasons, I consider that a cautious approach to urban expansion in the RCL is generally appropriate (excepting where such development is signalled in the QL Spatial Plan), corresponding to the application of the lowest landscape capacity rating (which does leave the door ajar for development as explained previously). I note that excepting 21.23.4 Church Road Shortcut Road PA, all of the Existing PALS RCL Schedules identify an 'extremely limited or no' landscape capacity rating for urban expansion. For 21.23.4, a rating of 'extremely limited' (the second to lowest rating) applies due to the extent and character of the existing rural industry development within the PA.

6.103 For these reasons, no changes are considered necessary in this regard.

**Request that terms such as ‘low key’ and ‘modest’ are deleted from the UCL
landscape capacity qualifying comments (and elsewhere in the Schedules)**

6.104 A number of submissions⁴² request that terminology such as ‘low key’ and ‘modest’ are deleted from the UCLs.

6.105 This matter was also discussed during the PALS hearing process, with the landscape experts and, ultimately, the Panel acknowledging that such terminology is of assistance to plan users. I note that this terminology has been carried through to the PALS Schedules (confirmed by Environment Court).

6.106 For this reason, no changes are considered necessary in this regard.

7. REVIEW OF LANDSCAPE RELATED SUBMISSIONS FOR EACH UCL

7.1 Detailed comments in response to submissions points relevant to each UCL are attached in **Appendix 1: UCL Landscape Comments Tables**.

7.2 Where a submission point is accepted in full or in part, the UCL (and in some instances, the PA) landscape assessment work, (along with, in some instances, my other assessment work in the relevant area), has informed that recommendation (although this is not explicitly stated for each table entry).

7.3 I have noted that none of the UCL submissions are supported by technical landscape evidence, but expect that such evidence will be provided as this UCL Variation progresses.

42 For example, see OS22.3, OS19.4.

8. RECOMMENDED CHANGES TO THE UCLS

8.1 My recommended changes to the UCLS text are attached to Ms Frew's s42A Report. The changes that I am recommending are as a result of:

- (a) reviewing hundreds of submission points (as detailed in **Appendix 1: UCLS Landscape Comments Tables**);
- (b) considering submission points in light of the learnings and outcomes of the PALS Council hearing and subsequent appeal process; and
- (c) collaboration with Ms Frew.

8.2 With respect to changes made to the UCLS Schedules and very minor mapping refinements in response to the Existing PALS that has been confirmed by the Environment Court, these can be summarised as follows:

- (a) Amendments to the presentation of the UCLS mapping⁴³ to:
 - (i) define the UCLS assessment extent (solid orange line and described as the 'Schedule Area Assessment Extent' or the 'Priority Area Assessment Extent'), which demarks the outer extent of the area assessed when the UCLS were prepared, and which may include a mix of zones including Exception Zones (which are defined in PDP 3.1B.5(a)); and
 - (ii) define the Rural Zone UCLS area (orange hatching and described as the 'Rural Zone Schedule Area' or the 'Rural Zone Priority Area'), which separately maps the Rural Zone land that is comprised within the UCLS assessment extent, and to which the UCLS apply.
- (b) Text amendments to the Preamble 21.23, to introduce the UCLS and explain how the UCLS are intended to be applied (ie in the same way as the Existing PALS 21.23 schedules). This is also discussed in Ms Frew's s42A Report.
- (c) Consequential amendments to the UCLS themselves with respect to guidance on their application (in addition to the changes that I recommend in response to submissions referred to in paragraph 8.1 above).

43 As referenced in the s42A Report Appendix 4 which includes a QLDC e-Plan mapping link and pdf maps.

- 8.3** With respect to the proposed amendments to the mapping, in my view this mapping solution is a practical way to differentiate the broader assessment area and the part of the UCLS non-PA that are within the Rural Zone. These amendments are consistent with the approach to the PA areas, and will provide assistance to plan users. This is further discussed in Ms Frew's s42A Report.
- 8.4** For completeness, it is my opinion that were the non-Rural Zone and/or the Exception Zone land to be excised from the 'UCLS Assessment Extent' or UCLS mapping entirely, the mapping would not align with landscape assessment best practice, as it would be driven by district plan zone boundaries, rather than a proper geographic landscape approach (where practicable). Further, it would guide a technically incorrect approach to the identification and evaluation of landscape values in the relevant UCLS Schedule that artificially excludes consideration of landscape values on land that is inextricably part of the relevant landscape.
- 8.5** The proposed amendments to the Preamble 21.23 and consequential amendments to the UCLS (to align with the Existing PALS) provide improved clarity on how the UCLS are intended to be applied. Again, it is my view that these proposed amendments do not alter the way that the UCLS were originally intended to be applied from an expert landscape perspective.
- 8.6** For these reasons, I consider that the **s42A Version of the UCLS** (see **Ms Frew's s42A Report**) are appropriate from a landscape perspective.

Bridget Gilbert

Date: 29 May 2026

Appendix 1: 'Landscape Comments Tables' (ordered by Schedule)

21.22.25 Mata-au Clutha River

May 2026 FINAL

Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS10.4	Michael Bathgate, Kai Tahu ki Otago	Support	That the landscape capacity ratings with 'extremely limited or no' capacity in Schedule 21.22.25 (Mata au Clutha River) for tourism-related activities, urban expansions, mineral extraction and transport infrastructure are retained as notified.	Aligns with Council landscape expert recommendations – no change required.	Accept.
OS10.5	Michael Bathgate, Kai Tahu ki Otago	Support	That the 'limited' landscape capacity rating for visitor accommodation being tied to the use of existing buildings and building platforms in landscape schedule 21.22.25 (Mata-au Clutha River) 'Landscape Capacity' ii. visitor accommodation and tourism related activities is retained as notified.	Aligns with Council landscape expert recommendations – no change required.	Accept.
OS10.6	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' i. commercial recreation activities is amended from some to very limited	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			landscape capacity and the descriptive text qualifies that the capacity rating is amended to seek that the use of new buildings or structures as part of a commercial recreation activities is avoided or minimised.	<p>in relation to the landscape capacity rating and qualifying comments for commercial recreation is appropriate. In my opinion, the notified text implicitly acknowledges the established commercial recreation activities in the ONF and signals a careful or measured amount of sensitively located and designed development of this type is unlikely to materially compromise the identified landscape values, subject to the qualifying comments.</p> <p>It should be noted that, as traversed in the PALS hearing process (and agreed by the landscape experts), the landscape capacity ratings used across the schedules effectively correspond to increments of smallness.</p>	
OS10.7	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' iv. intensive agriculture is amended from limited to extremely limited or no landscape capacity.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), and in particular, the extent of farming infrastructure evident in parts of the area (i.e. the intermediate terrace), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for intensive agriculture is appropriate.</p>	Reject.
OS10.8	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' x. renewable energy generation is amended from very limited to extremely limited or no landscape capacity.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for hydroelectric generation is appropriate.</p>	Reject.
OS10.9	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' xi. forestry is amended from very limited to extremely	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			limited or no landscape capacity.	in relation to the landscape capacity rating and qualifying comments for forestry is appropriate.	
OS10.13	Michael Bathgate, Kai Tahu ki Otago	Oppose	That the spelling of "Hawea" is corrected to Hawea in paragraph 4, and the spelling of "rangatira" be changed to "rakatira" in paragraph 12, in landscape schedule 21.22.25 (Mata au Clutha River).	Text corrections made to s42A Version of 21.22.25[4] and [12].	Accept.
OS10.14	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua features and their locations' be amended to delete paragraph 18 in its entirety.	Text deletion made to s42A Version of 21.22.25[18].	Accept.
OS10.15	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua features and their locations' be amended to add a new paragraph as follows: <u>"The entire area is ancestral land to Kai Tahu whanui and, as such, all landscape is significant, given that whakapapa, whenua and wai are all intertwined in te ao Maori."</u>	Text amendment made to s42A Version of 21.22.25[18].	Accept.
OS10.16	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua features and their locations' be amended to include a new paragraph as follows:	Text amendment made to s42A Version of 21.22.25[18]A.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"The ONF includes the mapped wahi tupuna Mata-au (Clutha River), Hawea River, Albert Town nohoaka and Te Rua Tupapaku."		
OS10.17	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua features and their locations' be amended to include a new paragraph as follows: " <u>The Mata-au (Clutha River) is a Statutory Acknowledgement under the Ngai Tahu Claims Settlement Act 1998.</u> "	Text amendment made to s42A Version of 21.22.25[18]B.	Accept.
OS10.18	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua and their locations' paragraph 19 be amended as follows: "A contemporary nohoaka (camping site to support traditional mahika kai activities) <u>is located</u> at the Albert Town campground on the true right of the Hawea, provided as redress under the Ngai Tahu Claims Settlements Act 1998."	Text correction made to s42A Version of 21.22.25[19].	Accept.
OS10.19	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua associations and experience'	Text deletion made to s42A Version of 21.22.25[20].	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			be amended to delete paragraph 20 in its entirety.		
OS10.20	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua associations and experience' be amended to include a new paragraph as follows: <u>"Kai Tahu whakapapa connections to whenua and wai generate a kaitiaki duty to uphold the mauri of all important landscape areas."</u>	Text amendment made to s42A Version of 21.22.25[20].	Accept.
OS10.21	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua associations and experience' be amended to include a new paragraph as follows: <u>"The Mata-au (Clutha River) takes its name from a Kai Tahu whakapapa that traces the genealogy of water. On that basis, the Mata-au is seen as a descendant of the creation traditions."</u>	Text amendment made to s42A Version of 21.22.25[20]A.	Accept.
OS10.22	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua associations and experience' be amended to include a new paragraph as follows: <u>"The Mata-au and the Hawea River were part of inland mahika kai trails, with</u>	Text amendment made to s42A Version of 21.22.25[20]B.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>the Mata-au also a key transportation route for pounamu from inland areas to settlements on the coast."</u>		
OS10.23	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua associations and experience' be amended to include a new paragraph as follows: <u>"Te Rua Tupapaku is a kaika mahika kai located on the Mata-au where weka, tuna (eels) and kauru (cabbage tree root) were gathered. It is also recorded as a fortified permanent pa."</u>	Text amendment made to s42A Version of 21.22.25[20]C.	Accept.
OS10.24	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Mana whenua associations and experience' be amended to include a new paragraph: <u>"The mana whenua values associated with this ONF include, but may not be limited to, wahi taoka, ara tawhito, mahika kai, nohoaka, urupa, pa and wahi tapu."</u>	Text amendment made to s42A Version of 21.22.25[20]D.	Accept.
OS15.6	Simon Peirce, Aurora Energy Limited	Oppose	That landscape schedule 21.22.25 (Mata-au/Clutha River) be amended to recognise the electricity sub-transmission infrastructure	Text amendment made to s42A Version of 21.22.25[11].	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			and significant electricity distribution infrastructure owned by Aurora Energy at the eastern end of Northlake.		
OS17.2	Dan Curley, Mata Au Investments Ltd	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'land use patterns and features' paragraph 10 to 11 be amended to include recognition that the true right bank is in private ownership as part of 84 Halliday Road (Lot 1 DP 555863).	No technical evidence is provided in support of this submission point. In accordance with landscape best practice, specific private landownership is not a matter recorded in a Schedule of Landscape Values. Further, the wording of the first sentence of 21.22.25[10] text alludes to the fact that not all of the river corridor is Council or Crown owned land and for these reasons, no further change to the text is considered necessary.	Reject.
OS17.3	Dan Curley, Mata Au Investments Ltd	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Land use patterns and features' be amended at paragraph 10 to 11 to recognise the human modification, including the existing track network on 83 Halliday Road (Lot 1 DP 555863) constructed/present on the true right escarpment.	Text amendment made to s42A Version of 21.22.25[10] to acknowledge tracks on both public and private land.	Accept in part.
OS17.4	Dan Curley, Mata Au Investments Ltd	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Particularly important views to and from the area' at paragraph 33 to 34 be amended to include a description that recognises that some parts of the true right escarpment do not offer such highly attractive views, with more human modified	No technical evidence is provided in support of this submission point. As explained in BG EiC, no detailed site visits on private land have been undertaken in connection with the drafting of 21.22.25. The submitter is encouraged to provide landscape expert evidence in support of this submission point, noting that paragraphs 33 and 34 relate to views from the river and from the cycling and walking tracks themselves.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			features such as the tracks and somewhat benched escarpment within 84 Halliday Road (Lot 1 DP555863).		
OS17.5	Dan Curley, Mata Au Investments Ltd	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Landscape Capacity' ii. visitor accommodation and tourism related activities be amended to limited capacity as follows: " Extremely Limited or no landscape capacity for tourism-related activities."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity ratings for visitor accommodation and tourism related activities are appropriate. I also note that the notified text of 21.22.25 in this regard is supported by Kai Tahu.	Reject.
OS17.6	Dan Curley, Mata Au Investments Ltd	Not Stated	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Landscape Capacity' xiii. transport infrastructure be amended to limited landscape capacity as follows: " extremely limited or no landscape capacity" or add <u>'with the exception if existing transport networks located within the Schedule'</u> .	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for transport infrastructure is appropriate. I also note that the notified text of 21.22.25 in this regard is supported by Kai Tahu.	Reject.
OS29.13	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) should have the capacity assessment revised to reflect the fact that the schedule is, in some situations, suitable for some urban expansion.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity rating for urban expansion is appropriate. I also note that the notified text of 21.22.25 in this regard is supported by Kai Tahu.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
				Applying the three-step test set out in <i>Rosehip</i> , urban development will typically undermine the identification/qualification of the feature as a natural landscape element, thereby compromising its fundamental classification as a RMA s6(b) feature. This issue was extensively traversed in the expert conferencing for the PALS workstream, where the experts agreed that within ONF/Ls, the appropriate landscape capacity rating for urban development is 'extremely limited or no' landscape capacity.	
OS29.15	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) should have the capacity assessment for rural living, commercial recreation activities, visitor accommodation, and tourism-related activities revised.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity ratings for rural living, commercial recreation activities, visitor accommodation and tourism related activities are appropriate. I also note that the notified text of 21.22.25 in relation to rural living, visitor accommodation and tourism related activities is supported by Kai Tahu.	Reject.
OS36.8	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That the submitters land (Lot 2 DP 26911, Lot 5 DP 22247 and part of Lot 3 DP 26911) is geographically and topographically dissimilar to the Clutha River/Mata au, and less natural and outstanding than the Clutha River/Mata-au due to its modified pastoral use, range of existing activities and proximity to Wanaka Airport.	No technical evidence is provided in support of this submission point. It is noted that the farming related modification and proximity of the area to Wānaka airport alluded to in the submission is already acknowledged under 21.22.25[11]. Also, see response to OS 36.9.	Reject.
OS36.9	Maree Baker-Galloway, NW &	Oppose	That the submitters land (Lot 2 DP 26911, Lot 5 DP 22247	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	DJ Pittaway Family Trust		and part of Lot 3 DP 26911) does not display the landscape characteristics of being highly legible and expressive of the historical relationship to the Clutha River/Mata au and is different in character to the enclosing banks of the Clutha River/Mata au	The submitter's land forms part of the broader landscape feature that has been identified by the Environment Court as an ONF. Further, it is widely acknowledged and accepted that within an Outstanding Natural Feature (or landscape), there can be varying degrees of legibility and expressiveness (and/or, other landscape values) across the relevant area. Also see BG EIC.	
OS36.10	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That the submitters land (Lot 2 DP 26911, Lot 5 DP 22247 and part of Lot 3 DP 26911) cannot be perceived as having highly natural attributes as set out in landscape schedule 21.22.25 (Mata au Clutha River).	Refer response to OS36.9.	Reject.
OS36.11	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) references to the working farmland being 'memorable' landscape values are opposed.	No technical evidence is provided in support of this submission point. I note that the working farmland is not mentioned in 21.22.25[38] as a memorable element of the PA.	Reject.
OS36.18	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' ii. visitor accommodation and tourism related activities be amended to 'some landscape capacity' in the flat land above the river.	No technical evidence is provided in support of this submission point. Refer response to OS29.15.	Reject.
OS36.19	Maree Baker-Galloway, NW &	Oppose	That landscape schedule 21.22.25 (Mata au Clutha	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	DJ Pittaway Family Trust		River) 'Landscape Capacity' v. earthworks be amended to 'some landscape capacity' in the flat land above the river.	Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity rating for earthworks is appropriate. I also note that ONFs typically have a particularly high sensitivity to earthworks changes due to their more limited size/extent and that this is reflected in the PDP provisions for earthworks in ONFs.	
OS36.20	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' xii rural living be amended to 'some landscape capacity' in the flat land above the river.	No technical evidence is provided in support of this submission point. Refer response to OS29.15.	Reject.
OS36.21	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' viii. transport infrastructure be amended to 'some landscape capacity' in the flat land above the river.	No technical evidence is provided in support of this submission point. Refer response to OS17.16.	Reject.
OS36.22	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' iii. urban expansions be amended to 'some landscape capacity' in the flat land above the river.	No technical evidence is provided in support of this submission point. Refer response to OS29.13.	Reject.
OS36.23	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) be amended to recognise and provide for appropriate capacity ratings so that the benefits of	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			changes and enhancements, including those related to farming, are not discouraged.	(which both included field work), I consider that the notified text in relation to the landscape capacity ratings are appropriate. The 21.22 Preamble explains that the schedules record landscape values and capacity at a point in time and acknowledges that each may change over time. It is acknowledged that farming practices may change over time and for this reason the 21.22 Preamble explains that the schedules are not intended to lock in existing land uses. Also refer discussion in relation to farming in BG EIC.	
OS36.24	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' vii. mineral extraction rating of 'extremely limited or no capacity', particularly for 'farm scale quarries and expansion of existing quarries that maintain or enhance the quality of views, naturalness values and aesthetic values' is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the landscape capacity rating for mineral extraction is appropriate. I note that there is no mention of farm scale quarries and expansion of existing quarries in 21.22.25.	Reject.
OS36.25	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' xii. rural living rating of 'very limited landscape capacity' is opposed.	No technical evidence is provided in support of this submission point. Refer response to OS29.15.	Reject.
OS39.1	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) be amended to reflect the highly modified nature of the submitters land (Lot 6 DP 325794 CT 104103) that is not sufficiently natural to be outstanding.	No technical evidence is provided in support of this submission point. Refer response to OS36.9. Also refer to the s42A Report (out of scope).	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS39.2	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That the submitters land (Lot 6 DP 325795 CT 104103) is geographically and topographically dissimilar to the Clutha River / Mata au, and less natural and outstanding than the Clutha Mata au due to its modified pastoral use, range of existing activities and proximity to Wanaka Airport.	No technical evidence is provided in support of this submission point. Refer response to OS36.8. Also refer to the s42A Report (out of scope).	Reject.
OS39.3	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) be amended to recognise that the submitters land (Lot 6 DP 325795 CT 104103) does not display the landscape characteristics of being highly legible and expressive of the historical relationship to the Clutha River and is different in character to the enclosing banks of the Clutha River/Mata au.	No technical evidence is provided in support of this submission point. Refer response to OS36.9.	Reject.
OS39.4	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) references to the submitters land (Lot 6 DP 325795 CT 104103) having highly natural attributes as set out is opposed.	No technical evidence is provided in support of this submission point. Refer response to OS36.9.	Reject.
OS39.5	Maree Baker-Galloway, Kathryn and	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) references to the working farmland being	No technical evidence is provided in support of this submission point. Refer response to OS36.11.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Vaughn Woodfield		'memorable' in landscape schedule are opposed.		
OS39.6	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Landscape Capacity' descriptions of landscape capacity should not read as policy direction with statements as to what mitigation is appropriate for activities, and what outcomes should be aimed for, and that any policy-type statements should be deleted.	The 21.23 Preamble explains that the schedules do not override PDP policies, standards or rules. The qualifying comments in the landscape capacity section of the schedules is intended to assist plan users and was supported by the landscape and planning experts in the PALS hearing process and has been carried through to the Existing PALS.	Reject.
OS39.7	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) should be amended to recognise and provide for appropriate capacity ratings so that the benefits of changes and enhancements, including those related to farming, are not discouraged.	No technical evidence is provided in support of this submission point. Refer response to OS36.23.	Reject.
OS39.8	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' xii. rural living of "very limited" landscape capacity is opposed.	No technical evidence is provided in support of this submission point. Refer response to OS29.15.	Reject.
OS39.10	Maree Baker-Galloway, Kathryn and	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity'	No technical evidence is provided in support of this submission point. Refer response to OS36.19.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Vaughn Woodfield		v. earthworks be amended as follows: Earthworks – limited landscape capacity for earthworks and additional trails that protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns. Some landscape capacity for additional earthworks to manage erosion hazards in the vicinity of Albert Town that are sympathetically designed to integrate with existing natural landform patterns and for Lot 6 DP 325795 held in Record of Title 104103 as identified in Rule 25.5.2 of the PDP.		
OS39.11	Maree Baker-Galloway, Kathryn and Vaughn Woodfield	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) be amended to address the deficiencies identified in the submission.	Amendments have been made to 21.22.25 in response to submissions, in so far as they are supported by expert landscape and planning advice.	Accept in part.
OS44.1	Ian Hadland	Support	That landscape schedule 21.22.25 (Mata au Clutha River) 'Recreational attributes and values' be amended to include reference to the status of the nationally significant fishery of the Clutha River Priority Area.	Text amendment made to s42A Version of 21.22.25[26].	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS44.4	Ian Hadland	Support	That landscape schedule 21.22.25 (Mata au Clutha River) 'Summary of Landscape Values' associative values at paragraph 44 be amended from 'high' to 'very high'.	No technical evidence is provided in support of this submission point. The evaluation of the collective associative values as 21.22.25[44] acknowledges the significant recreational attributes of the ONF and no further change is considered necessary in this regard.	Reject.
OS45.1	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Ecological features and vegetation types' description is opposed.	No technical evidence is provided in support of this submission point. The text of 21.22.25 was reviewed by an expert ecologist, with that expert supporting the notified text.	Reject.
OS45.2	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Ecological features and vegetation types' description be amended to identify the pine plantation located roughly midway between the Outlet and the Albert Town Campground.	Text amendment made to s42A Version of 21.22.25[8](b).	Accept.
OS45.3	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Land use patterns and features' description is opposed.	It is likely that the text amendments proposed in response to OS 45.4 will address this point, leaving the majority of the notified text in relation to the 21.22.25 land use patterns and features unchanged.	Accept in part.
OS45.4	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Land use patterns and features' should be amended to acknowledge the presence of urban development and urban zoned land immediately adjacent to the Outstanding	Text amendment made to s42A Version of 21.22.25[10].	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			Natural Feature including the Northlake Special Zone (which includes the submitters Hikuwai development) and Albert Town.		
OS45.5	Scott Edgar, Exclusive Developments Limited	Oppose	That the description of 'Naturalness attributes and values' in landscape schedule 21.22.25 (Mata-au Clutha River) is opposed.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text in relation to the naturalness attributes and values is appropriate.</p> <p>Further, it is likely that the text amendments proposed in response to OS 45.6 will address this point, leaving the majority of the notified text in relation to the 21.22.25 naturalness unchanged</p>	Accept in part.
OS45.6	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Naturalness attributes and values' should be amended to include reference to the pine plantations when listing land use activities that have contributed to the modification of the Outstanding Natural Feature.	Text amendment made to s42A Version of 21.22.25[36].	Accept.
OS45.7	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Landscape Capacity' iii. urban expansions 'extremely	<p>No technical evidence is provided in support of this submission point.</p> <p>Refer response to OS29.13.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			limited or no landscape capacity' rating is opposed.		
OS45.8	Scott Edgar, Exclusive Developments Limited	Oppose	That direction is required to outline where or what circumstances the extremely limited capacity for urban expansion is in landscape schedule 21.22.25 (Mata-au Clutha River).	No technical evidence is provided in support of this submission point. To address this submission point, a very fine grained, site by site assessment of the landscape effects of urban development would be required. This goes beyond the scope of Schedules of Landscape Values and landscape capacity for the purposes of a district plan. Further, the 21.22 Preamble clearly explains that the evaluation of landscape capacity is based on the area as whole and is not intended to describe the relevant capacity of specific sites, that landscape capacity ratings and qualifying comments are 'high level', and that landscape capacity is not a fixed concept and may change over time.	Reject.
OS45.9	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Ecological features and vegetation types' paragraph 8b be amended as follows: "Mature and semi-mature radiata pine stands and plantations at The Outlet, <u>adjacent to the Hikuwai Reserve</u> , the Albert Town Campground and further downstream, with some wilding spread."	Refer response to OS45.2.	Accept.
OS45.10	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) 'Land use patterns and features' paragraph 10 is amended as follows:	Refer response to OS45.4.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>"Much of the river corridor is Council-owned or Crown-owned land used for informal recreation, camping or historic/scientific reserve. Apart from the bridges, there is little human modification on the immediate banks of the river <u>however the priority area immediately adjoins the Urban Growth Boundary and existing or zoned urban development to the south of the river at Northlake/Hikuwai and Albert Town</u>. The bank and river escarpment on the true right immediately upstream of the Albert Town bridge have been modified to reduce hazards associated with river erosion and there are shelters, toilets and a rodeo arena within the Albert Town campground across the river."</p>		
OS45.11	Scott Edgar, Exclusive Developments Limited	Oppose	<p>That landscape schedule 21.22.25 (Mata-au Clutha River) 'Naturalness attributes and values' paragraph 36 is amended as follows:</p> <p>"Although rural living, campgrounds, modified landforms, <u>pine plantations</u> and intensive farming are present with the PA, this</p>	Refer response to OS45.6.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			domestication and modification is dwarfed by the scale of the soaring river terrace escarpments and the areas of indigenous vegetation, and there is a high perception of naturalness overall."		
OS45.12	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.23.25 (Mata-au Clutha River) 'Landscape capacity' iii. urban expansions be amended as follows: "iii. Urban expansions - extremely limited or no landscape capacity- with any capacity likely to be in locations that immediately adjoin existing urban growth boundaries and/or existing or zoned urban development where there is scope for environmental enhancement and where future development can be absorbed by existing landform and/or vegetation such that the values of the wider ONF are protected. "	No technical evidence is provided in support of this submission point. See response to OS45.8. Further, from a landscape perspective, it does not always follow that urban development is likely to be more appropriate along the edge of an ONF adjoining urban land, as the edges of a feature and the immediate interface of urban and ONF land can be more sensitive to development change in terms of protecting landscape values.	Reject.
OS45.13	Scott Edgar, Exclusive Developments Limited	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) be amended to more accurately describe the values of the priority area and the landscape capacity for urban expansion.	See response to OS45.12.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS45.14	Scott Edgar, Exclusive Developments Limited	Oppose	<p>That landscape schedule 21.22.25 (Mata-au Clutha River) 'Land use patterns and features' is amended as follows:</p> <p><u>"Pine plantations extend into the priority area at The Outlet, adjacent to the Hikuwai Reserve, the Albert Town Campground and further downstream and</u> Low density rural living and small farming on lots of 20-40ha is present on the intermediate terrace at Poplar Beach on the southern side of the Mata-au Clutha River below Wanaka airport. Across the river to the north, dairy farming under pivot irrigation is present on the intermediate terrace, as far west as the Hawea confluence. Farming infrastructure, including haysheds, milking sheds, silos, farm tracks and effluent ponds are also evident."</p>	Text amendment made to s42A Version of 21.22.25[11] (albeit in a slightly different location to that requested by the submitter).	Accept.
OS47.1	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) requires significant changes to reflect that the submitters land (Lot 4 DP 325795 CT 104101) is highly modified and should not be	Amendments have been made to 21.22.25 in response to submissions, in so far as they are supported by expert landscape and planning advice. Also see response to OS36.9.	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			considered sufficiently natural to be outstanding.		
OS47.2	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) should be amended to note that the submitters land (Lot 4 DP 325795 CT 104101) is geographically and topographically dissimilar to the Clutha River/Mata au, and less natural and outstanding than the Clutha River/Mata au due its modified pastoral use, range of existing activities and proximity to the Wanaka Airport.	No technical evidence is provided in support of this submission point. See response to OS36.8.	Reject.
OS47.3	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That in relation to the submitters land (Lot 4 DP 325795 CT 104101), landscape schedule 21.22.25 (Mata au Clutha River) does not display the landscape characteristics of being highly legible and expressive of the historical relationship to the Clutha River, and is different in character to the enclosing banks of the Clutha River/Mata au.	Refer response to OS36.9.	Reject.
OS47.4	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) should be amended so that the submitters land (Lot 4 DP 325795 CT	No technical evidence is provided in support of this submission point. Modification and domestication associated with farming is acknowledged in 21.22.25 [35]. Further, the 21.22 Preamble explains that the identified landscape attributes and values, are	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			104101) is not described as having highly natural attributes.	<p>based on an assessment of the Priority Area Assessment Extent as a whole and are not intended to describe the attributes and values of specific sites.</p> <p>The Decisions Version 21.22 Preamble goes on to explain: <i>Given the scale of the landscape assessment underpinning the PA Schedules, a finer grain proposal-specific assessment of landscape attributes and values will typically be required for plan implementation purposes⁶. Through any proposal-specific assessment, the identified landscape value/s recorded in the PA Schedules may not be relevant to a site, and/or additional values may be identified.</i></p> <p>For these reasons, no text changes are considered to be appropriate or necessary in this regard.</p>	
OS47.5	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) should be amended so that references to the working farmland being 'memorable' are removed.	Refer response to OS36.11.	Reject.
OS47.6	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata-au Clutha River) should be amended so that the descriptions of landscape capacity do not read as policy direction, and statements as to what mitigation is appropriate for activities, what outcomes should be aimed for, and any other policy type statements are deleted.	<p>No technical evidence is provided in support of this submission point.</p> <p>The inclusion of qualifying comments in the landscape capacity section of the schedule is intended as high-level guidance (or, a 'starting point') for plan users on what might form appropriate development, where that can be articulated.</p> <p>As the 21.22 Preamble explains:</p> <p><i>[5.3] The landscape capacity ratings and associated descriptions are high level and are not intended to describe the relevant capacity of specific sites within a Rural Zone Priority Area. These descriptions are not a replacement for any relevant policies, rules or standards in the District Plan, and are intended to provide guidance only.</i></p> <p><i>[5.4] Landscape capacity is not a fixed concept and it may change over time as development occurs or landscape characteristics change. In addition, within each Rural Zone Priority Area there is likely to be variation in landscape capacity, that will require detailed consideration and assessment through future resource consent applications. As</i></p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
				<p><i>development, landscape or policy change occurs, there may be a need to review the spatial extent of the Rural Zone Priority Area, or the content of the PA Schedules (including landscape capacity ratings).</i></p> <p><i>[5.6] It is intended that the use of this five-tier landscape capacity terminology, along with a description of the characteristics that are likely to frame development that is appropriate (from a landscape perspective), and the description of the landscape attributes and values will assist in providing high level guidance with respect to the scale, location and characteristics of each land use type that will protect landscape values of the ONF/L.</i></p>	
OS47.7	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) should be amended to recognise and provide for appropriate capacity ratings so that the benefits of changes and enhancements, including those related to farming, are not discouraged.	See response to OS36.23.	Reject.
OS47.8	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That the "very limited" landscape capacity rating set out in landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' xii. rural living is opposed.	See response to OS29.15.	Reject.
OS47.10	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) 'Landscape Capacity' v. earthworks be amended as follows: Earthworks – limited landscape capacity for earthworks and additional	See responses to OS17.2 and OS36.19.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			trails that protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns. Some landscape capacity for additional earthworks to manage erosion hazards in the vicinity of Albert Town that are sympathetically designed to integrate with existing natural landform patterns <u>and for Lot 4 DP 325795 held in Record of Title 104101 as identified in Rule 25.5.2 of the PDP.</u>		
OS47.11	Maree Baker-Galloway, Dirk and Rebecca Venter	Oppose	That landscape schedule 21.22.25 (Mata au Clutha River) be amended to address the deficiencies identified in the submission.	Amendments have been made to 21.22.25 in response to submissions, to reflect landowner knowledge, correct errors, align with the PALS approach etc, in so far as they are supported by expert landscape and planning advice.	Accept in part.

21.23.6 East of Wānaka – Mount Aspiring Road

May 2026 FINAL

Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS4.1	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka Mount Aspiring Road) be amended to recognise the variability in landscape significance in the submitter's property, such as the lower lucerne paddocks which have lower significance, and the roche moutonnée which has higher visibility and landscape significance in the area.	<p>No technical evidence is provided in support of this submission point.</p> <p>The submitter's land forms part of the broader landscape that has been identified by the Environment Court to qualify as RCL. Further, it is widely acknowledged and accepted that within a rural landscape unit or area, there can be varying degrees of landscape values across the relevant area.</p> <p>It is also noted that the 21.23 Preamble signals that the attributes and values (and landscape capacity) identified in a schedule, relates to the area as a whole, rather than specific sites. Further, the Preamble acknowledges that a site-specific assessment will be required for a specific proposal and such an assessment may identify additional landscape values. In my opinion, such a detailed evaluation may identify the nuances in visibility across the submitter's land, referred to in their submission.</p>	Reject.
OS4.2	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>The schedules should recognise this variability that exists</p> <p>within the non-PA and the consequential variability in landscape capacity.</p>	<p>The Preamble to 21.23 explains that the schedules are high level.</p> <p>Also refer response to OS4.1.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS4.7	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'General Description of the Area' be amended to include the following:</p> <p><u>"The area retains landscape value due to its setting within the wider context of the Lake and adjacent ONL and geomorphological attributes; however, the landscape values are variable within the non-PA with lower lying areas affected by existing domestic elements (including grazed paddocks, exotic tree plantings, vineyard and equestrian activities) and the area's location at the periphery of Wanaka."</u></p>	<p>No technical evidence is provided in support of this submission point.</p> <p>The General Description of each schedule is intended as a brief 'scene setting' introduction that broadly locates the area addressed by the schedule. The changes requested in this submission point go beyond 'scene setting/locating' the area and are not considered appropriate or necessary.</p>	Reject.
OS4.8	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka Mount Aspiring Road) 'Hydrological features' be amended at paragraph 3 as follows:</p> <p><u>"3. A remnant wetland feature on low lying land adjacent to Wanaka - Mount Aspiring Road on Section 14 SO 468813 and a pond in the hummocky terrain located on Lot 2 DP 325559."</u></p>	<p>No technical evidence is provided in support of this submission point.</p> <p>In accordance with landscape best practice, specific private landownership is not typically a matter recorded in a Schedule of Landscape Values.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS4.9	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Ecological features and vegetation types' be amended at paragraph 4 as follows:</p> <p>4. Particularly noteworthy indigenous vegetation features include:</p> <p>a. Localised patches of regenerating kanuka along the lakeshore <u>both outside of the non-PA (within the ONL adjoining the lakefront) which is protected by an existing QEII covenant with public access enabled), and partly extending across the northern edge of the non PA.</u></p> <p>b. grey shrubland and bracken fern land across steeper hummocky terrain and escarpments.</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>The text of 21.23.6 was reviewed by an expert ecologist, with that expert supporting the notified text.</p> <p>Further, in my opinion as a landscape expert, the requested text changes add little in terms of explaining the relevant landscape values of the area.</p>	Reject.
OS4.10	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka Mount Aspiring Road) 'Land use patterns and features' be amended at paragraph 11 as follows:</p> <p>11. d. the urban edge of Wanaka (Urban Growth Boundary) along the eastern boundary, generally coinciding with the toe of steeper slopes associated</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PA Schedules workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[11](d) is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			with the moraine landform at the eastern end of the area. The northern and southern portions of the urban area form abrupt transitions with no discernible defensible landform or other 'landscape' edge, making the urban boundary potentially vulnerable to urban development creep.		
OS4.11	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka Mount Aspiring Road) 'Shared and recognised attributes and values' be amended at paragraph 18 as follows: 18. The identity of the area as a 'green belt' on the north western side of Wanaka, <u>The current combination of vegetation types of the area</u> in providing a sympathetic transition to the vast ONL beyond.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[18] is appropriate.	Reject.
OS4.12	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Legibility and expressiveness attributes and values' be amended at paragraph 24 as follows: 24. The roche moutonnée (as part of the more extensive sequence of these	Text amendment made to 21.23.6[24].	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			landforms stretching extending northwards to Damper Bay)...”		
OS4.13	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) ‘Particularly important views to and from the area’ be amended at paragraph 25 as follows:</p> <p>“The sequence of attractive and varied views across the area from Wanaka-Mt Aspiring Road and Rippon Vineyard. In these views the area is seen balanced by the dramatic and large-scale landforms of the Mt Alpha Range. The broader mountain and lake context of Wanaka forms the backdrop to the area in places, adding a sense of connection to the vast and rugged landscape context to the north. <u>Limited framed vistas across the northern portion of the area to the lake are available from parts of the stretch of Ruby Island Road adjacent the northern end of the area.</u> The distinctly rural appearance of the Views across the area are comprised of an attractive mix of pastoral land, vineyard plantings,</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PA Schedules workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[25] is appropriate.</p> <p>It should also be noted that this section of 21.23.6 addresses particularly important views to and from the area. Within that context, it is not necessary to mention aspects that are not visible.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>equestrian facilities, and extensive amenity plantings (and in which buildings are obscured from view). serves to reinforce the connection of the area to the proximate pastoral Alpha Range context. Some parts of the non-PA are visually contained from public views such as the low-lying north-eastern lucerne paddocks."</p>		
OS4.14	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That paragraph 27 of landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) be deleted from 'Particularly important views to and from the area' and relocated under section 'Land use Patterns and Features'.</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALs workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[27] is appropriate located under the 'Particularly important views to and from the area' section of 21.23.6.</p> <p>However, in reviewing this submission point, a typographical error in [27] has been corrected</p>	Reject.
OS4.15	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka Mount Aspiring Road) 'Particularly important views to and from the area' be amended at paragraph 27 as follows:</p> <p>"27. x. Pleasant parkland style views from Ruby Island Road across the northern portion of the RCL area in</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[27] is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			which there is an appreciation of the attractive interplay of grazing land and amenity plantings that dominates this part of the area. The careful siting of buildings so that they are not seen from the road reinforces the impression of a rural parkland setting."		
OS4.16	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka Mount Aspiring Road) 'Particularly important views to and from the area' be amended to delete paragraph 29 in its entirety.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[29] is appropriate.	Reject.
OS4.17	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Memorability attributes and values' be amended to delete paragraph 32 in its entirety.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[32] is appropriate.	Reject.
OS4.18	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Landscape capacity' i. commercial recreation activities be amended to limited capacity as follows: "i. Commercial recreation activities - very limited."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the landscape capacity rating of very limited is appropriate for commercial recreation activities. This is in part due to the very broad range of activities that this activity covers under the PDP Chapter 2 definition as explained in the 21.23 Preamble.	Reject.
OS4.19	Nicola and John Blennerhassett,	Oppose	That landscape schedule 21.23.6 (East of Wanaka -	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	JS Blennerhassett Family Trust		<p>Mount Aspiring Road) 'Landscape capacity' ii Visitor Accommodation and tourism related activities to some landscape capacity as follows:</p> <p>"ii. Visitor Accommodation and tourism related activities - limited some...; and Extremely limited landscape capacity for tourism related activities that are: visually recessive, designed to be small scale and have a low key rural character."</p>	<p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for visitor accommodation and tourism related activities is appropriate.</p>	
OS4.20	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Landscape capacity' iii. Urban expansions be amended as follows:</p> <p>"iii. Urban Expansions – extremely limited or no landscape capacity. <u>At the time of identification of the landscape schedule, the</u> absence of a discernible defensible edge to Wanaka makes the neighbouring parts of the area particularly vulnerable to urban development creep. <u>It is acknowledged that strategic planning context can change over time and capacity for urban expansion should be</u></p>	<p>No technical evidence is provided in support of this submission point.</p> <p>The 21.23 Preamble explains that the schedules correspond to a point in time and that landscape capacity can change over time. For these reasons, it is not considered necessary to amend 21.23.6 in the manner requested by the submitter.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>considered with regard to the relevant planning environment existing at the time."</u>		
OS4.21	Nicola and John Blennerhassett, JS Blennerhassett Family Trust	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Landscape capacity' xii Rural living be amended as follows: "xii. Rural Living - very limited landscape capacity to absorb additional rural living <u>in the more sensitive parts of the non-PA</u> without cumulative adverse effects on associative and perceptual values. Limited landscape capacity for rural living may be possible in more confined locations that are screened from public views."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for rural living is appropriate. It is also noted, that from a landscape expert perspective, the qualifying comments in the notified text provide more comprehensive guidance to plan users on the likely characteristics of appropriate development, that embrace the full range of landscape factors (rather than simply focussing on views from public places).	Reject.
OS8.1	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East – Wanaka Mount Aspiring Road) is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to 21.23.6 is appropriate (excepting the minor corrections recommended in the s42A Report version of 21.23.6).	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS8.2	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Ecological features and vegetation types' paragraph 6 reference to skinks is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.6 was reviewed by an expert ecologist, with that expert supporting the notified text, including reference to skinks.	Reject
OS8.3	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Land use patterns and features' at paragraph 11 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the land use patterns and features is appropriate.	Reject.
OS8.4	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka-Mount Aspiring Road) 'Land use patterns and features' at paragraph 11(d). is opposed.	Refer response to OS8.3.	Reject.
OS8.5	Phil Page, Wanaka Station Trust, Rippon	Oppose	That landscape schedule 21.23.6 (East of Wanaka-Mount Aspiring Road)	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.		'Historical attributes and values' paragraph 17 is opposed.	The text of 21.23.6 was reviewed by a heritage expert, with that expert supporting the notified text, including 21.23.6[17]. The submitter is encouraged to provide evidence on this matter as to why, in their view, the notified text should be deleted.	
OS8.6	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Shared and recognised attributes and values' paragraph 18 be amended to remove the term "green belt".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the 21.23.6[18] is appropriate. In saying this, the 21.23 Preamble explains that differing landscape values may be identified as part of a site-specific landscape assessment, and that landscape capacity may change over time.	Reject.
OS8.7	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Recreation attributes and values' paragraph 23 be amended to delete reference to horse riding and equestrian activities.	It is acknowledged that horse riding and equestrian activities may be very recent activities, however they reflect the current land use and recreational values associated with the area. The 21.23 Preamble acknowledges that the schedules correspond to a point in time and that landscape values may change over time. For these reasons, no change to 21.23.6[23] is considered necessary.	Reject.
OS8.8	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Particularly important views to and from the area' paragraph 25 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream,	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.			both of which included field work), I consider that the notified text in relation to the 21.23.6[25] is appropriate.	
OS8.9	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Naturalness attributes and values' paragraph 31 reference to "moderate degree of natural rather than built elements present" is opposed as the context is peri-urban.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the 21.23.6[31] is appropriate. For completeness, the influence of the proximate urban context has been factored into the evaluation of the area displaying a moderate level of naturalness.	Reject.
OS8.10	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Memorability attributes and values' paragraph 32 reference to "green belt" be deleted.	Refer response to OS8.6.	Reject.
OS8.11	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Aesthetic attributes and values' paragraph 39b. reference to "parkland impression" is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the 21.23.6[39](b) is appropriate. The use of the term 'parkland impression' does not denote a PDP zoning but rather references a type of landscape character. It is noted that this term has been accepted in the PDP 24.8 LCU	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Murray Graham Valentine.			descriptions, for example LCU 23 Millbrook where the 'sense of place is described as <i>"Generally, the unit reads as an intensively-developed attractive urban settlement set within a parkland landscape"</i> .	
OS8.12	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Aesthetic attributes and values' paragraph 39e. reference to the "low number of buildings" is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PA Schedules workstream, both of which included field work), I consider that the notified text in relation to the 21.23.6 [39](e) is appropriate. Also refer response to OS8.7 which equally applies here in terms of the schedule reflecting a point in time.	
OS8.13	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka - Mount Aspiring Road) 'Summary of Landscape Values' paragraph 41 be amended to delete reference to "the shared and recognised values of the area for residents, locals and visitors as a rural greenbelt/buffer along the western side of Wanaka".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the 21.23.6[41] is appropriate from an expert landscape perspective.	Reject.
OS8.14	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Summary of Landscape Values' paragraph 42 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to the 21.23.6[42] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Diana Mills, and Murray Graham Valentine.				
OS8.15	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Landscape Capacity' landscape capacity ratings are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to landscape capacity is appropriate.	Reject.
OS8.17	Phil Page, Wanaka Station Trust, Rippon Vineyard and Winery Land Co Limited, Roger Norman Macassey, Lois Diana Mills, and Murray Graham Valentine.	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) if not rejected, that alternatively, changes are made to give effect to the relief sought in the submission.	Amendments have been made to 21.23.6 in response to submissions, to reflect landowner knowledge, correct errors, align with the PALS approach etc, in so far as they are supported by expert landscape and planning advice.	Accept in part.
OS32.2	Duncan White, Patersons	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'General Description of the Area' be amended to include the following additional text: " <u>The area retains landscape value due to its setting within the wider context of the lake and adjacent ONL and geomorphological attributes;</u>	No technical evidence is provided in support of this submission point. The General Description of each schedule is intended as a brief 'scene setting' introduction that broadly locates the area addressed by the schedule. The changes requested in this submission point go beyond 'scene setting/locating' the area and are not considered appropriate or necessary.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>however, the landscape values are variable within the area with lower lying areas affected by existing domestic elements (including grazed paddocks, exotic tree plantings, vineyard, cellar door, events and equestrian activities and the Rippon Hall) and the area's location at the periphery of Wanaka."</u>		
OS32.3	Duncan White, Patersons	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Shared and recognised attributes and values' paragraph 18 be amended as follows: "18. The identity of the area as a 'green belt' on the north-western side of Wanaka, The current combination of vegetation types of the area in providing a sympathetic transition to the vast ONL beyond. "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream, both of which included field work), I consider that the notified text in relation to 21.23.6[18] is appropriate. In my opinion, the area does have a distinct 'greenbelt' (or 'buffer') identity that draws from more than simply vegetation patterns and includes the landform and building patterns (including rural, urban and rural residential buildings), and how these various landscape elements and patterns collectively interact.	Reject.
OS32.4	Duncan White, Patersons	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Legibility and expressiveness attributes and values' paragraph 24 be amended as follows: 24. The roche moutonnee (as part of the more extensive sequence of these	Refer response to OS4.12.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			landforms stretching extending northwards to Damper Bay), hummocky moraine, alluvial depositions in valleys and Waterfall Creek paleo channel (in the vicinity of the equestrian facility and road) are expressive of the interaction of the glacial and fluvial processes that have shaped the Wanaka area.		
OS32.5	Duncan White, Patersons	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Particularly important views to and from the area' paragraph 27 be amended as follows:</p> <p><u>Land Use Patterns and Features</u></p> <p>"27. Pleasant parkland style views from Ruby Island Road across the northern portion of the RCL area in which there is an appreciation of the attractive interplay of grazing <u>farmed</u> land and amenity plantings that dominates this part of the area. The careful siting of buildings so that they are not seen from the road reinforces the impression of a rural parkland setting."</p>	Refer response to OS4.14, OS4.15 and OS8.11.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS32.6	Duncan White, Patersons	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Particularly important views to and from the area' paragraph 29 be amended as follows: "29. Long range views from Eely Point and eastern (urban) side of Roys Bay, in which there is an appreciation of the glacial landforms of area. The spacious appearance of the area, which is generally uncluttered by buildings, forms a distinctive rural bookend to the urban patterning along the eastern side of the lake and blends harmoniously with the Alpha Range backdrop."	Refer response to OS4.16.	Reject.
OS32.7	Duncan White, Patersons	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Memorability attributes and values' paragraph 32 be amended as follows: 32. Memorable to residents and locals as a 'green belt' the transition from urban to rural activities to on the northern side of Wanaka.	Refer response to OS4.17. For completeness, I do not consider that the area forms a transition in the sense of it being a 'middle ground' between rural and urban landscape characters. Rather, I consider the area reads as a distinct contrast to the adjacent urban area.	Reject.
OS32.8	Duncan White, Patersons	Oppose	That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road)	Refer response to OS4.18.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>'Landscape capacity' i. commercial recreation activities is amended to limited landscape capacity as follows:</p> <p>"i. Commercial recreation activities - very limited..."</p>		
OS32.9	Duncan White, Patersons	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Landscape capacity' ii. visitor accommodation and tourism related activities is amended as follows:</p> <p>"ii. Visitor accommodation and tourism related activities - limited some landscape capacity for activities that are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). Extremely limited landscape capacity for tourism related activities that are: visually recessive, designed to be small scale and have a low key rural character; integrate landscape restoration and</p>	Refer response to OS4.19.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			enhancement (where appropriate); and enhance public access (where appropriate).		
OS32.10	Duncan White, Patersons	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Landscape capacity' iii. urban expansions be amended from extremely limited to no, to extremely limited landscape capacity as follows:</p> <p>"iii. Urban expansions - extremely limited or no landscape capacity. The absence of a discernible defensible edge to Wanaka makes the neighbouring parts of the area particularly vulnerable to urban development creep."</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>It was acknowledged by all of the landscape experts in expert conferencing for the PALS (Council) hearing, that the lowest capacity rating used in the schedules needed to signal that in certain circumstances there may be no landscape capacity for an activity. I note that this approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders).</p> <p>Urban expansion is typically one such activity, due to the significant landscape character transformation associated with this sort of development in a rural landscape context. However, as explained in the 21.23 Preamble, a site-specific landscape assessment as part of a plan change or resource consent application, may determine different landscape values and capacity to that identified in the schedule (which relates to the area as a whole). In my opinion this guidance along with the deliberate wording of 'extremely limited or no' landscape capacity, effectively leaves the door ajar for such development to be considered at some time in the future.</p> <p>For these reasons, I do not support the text changes requested by the submitter.</p>	Reject.
OS32.11	Duncan White, Patersons	Oppose	<p>That landscape schedule 21.23.6 (East of Wanaka – Mount Aspiring Road) 'Landscape capacity' xii. rural living be amended as follows:</p> <p>xii. Rural Living – very limited landscape capacity landscape capacity to absorb</p>	Refer response to OS4.21.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>additional rural living <u>in the more sensitive parts of the area</u> without cumulative adverse effects on associative and perceptual values. <u>Limited landscape capacity for rural living may be possible in more confined locations that are screened from public views.</u></p>		

21.23.7 Studholme Road

May 2026 FINAL

Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS7.1	Florence Micoud	Oppose	That the map definition for the Studholme Road Rural Character Landscape in Schedule 21.23.7 (Studholme Road) is reviewed to include the whole of Studholme Road.	The intention of the Upper Clutha Landscape Schedules Variation is to relate to RCL or Clutha Mata-au ONF land. The balance of the land on Studholme Road referred to by the submitter is not RCL and is therefore not relevant to the current Variation.	Reject.
OS7.2	Florence Micoud	Oppose	That the whole of Studholme road be included in landscape schedule 21.23.7 (Studholme Road).	Refer response to OS7.1.	Reject.
OS7.4	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landforms and land types' be amended at paragraph 3 as follows: "The relatively free-draining brown and pallic soils with reasonable fertility and largely gentle contour, reflect the pastoral farming <u>and rural lifestyle</u> land uses in the area."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[3] is appropriate. More specifically, rural lifestyle land uses are typically not directly linked to soil characteristics and the schedule acknowledges the landscape influence of rural lifestyle type land uses under 'Land use patterns and features'.	Reject.
OS7.5	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road)	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			'Ecological features and vegetation types' be amended at paragraph 6a as follows: a. Exotic shelterbelts (poplar, macrocarpa, Douglas fir, and pine) with scattered shade and <u>mature</u> exotic deciduous specimen trees (including walnuts and <u>collections of unusual conifers and exotic trees, firewood eucalyptus plantations</u>).	Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[6] is appropriate (particularly when read in combination with the 21.23 Preamble which explains that other values may emerge as part of a site specific landscape assessment for a proposal).	
OS7.6	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Ecological features and vegetation types' be amended at paragraph 8 as follows: " <u>Rank and regenerating exotic grassland is may be</u> utilised by skinks <u>and a wide variety of insects</u> ."	No technical evidence is provided in support of this submission point. The text of 21.23.7 was reviewed by an expert ecologist, with that expert supporting the notified text, including [8].	Reject.
OS7.7	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) be amended to include new paragraphs under subheading 'Ecological features and vegetation types' as follows: "9. <u>The Studholme valley is home to the following native birds: pied oystercatcher, kingfisher, spurwing plover, australasian harrier, paradise shelduck, tui, bellbird, fantail,</u>	No technical evidence is provided in support of this submission point. The text of 21.23.7 was reviewed by an expert ecologist, with that expert supporting the notified text, including [9].	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p><u>silvereeye, and a ruru/morepork has been heard last year.</u></p> <p>10. Also home to an <u>abundant exotic birdlife: quails, little owl, yellow hammer, blackbirds, song thrush, chaffinch, goldfinch, sparrow, starling, other finches.</u></p> <p>11. <u>Frogs are present."</u></p>		
OS7.8	Florence Micoud	Oppose	<p>That landscape schedule 21.23.7 (Studholme Road) 'Land use patterns and features' be amended at paragraph 9 as follows:</p> <p>"The majority of the area forms a small part of a much larger rural landholding (sheep and deer farming with some forestry). The area is dominated by working land use with only one smaller-scale rural living lot (approximately 3ha) evident. A cluster of rural cottages and buildings is located roughly in the centre of the area <u>and on the Studholme Road South</u>. All of the rural and rural living buildings are well integrated by mature plantings which limits their visibility from outside the area."</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[9] is appropriate. It is possible that the submitter has misunderstood the extent of the mapped are to which 21.23.7 corresponds to.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS7.9	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Land use patterns and features' be amended at paragraph 10a as follows: "Urban Residential zoned land (and the Wanaka Urban Growth Boundary) and Rural Lifestyle zoning around the northwest, north, south and east sides of the area. The general absence of a strong natural landscape boundary along these edges makes the area vulnerable to development creep. <u>Yet on the south, there is a clear ridge separating Wanaka and Studholme valley and the development should really stop on the north side of this ridge, where there is a lake view.</u> "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[10](a) is appropriate.	Reject.
OS7.10	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Archaeological and heritage features and their locations' be amended at paragraph 11 as follows: "Stone dairy building, circa 1890, at Hawthenden. <u>Farm adjacent to the protected sequoia tree and includes an old orchard and sheepyard wall creating a charming historical area. In the middle of Studholme Road South is</u>	No technical evidence is provided in support of this submission point. The text of 21.23.7 was reviewed by a heritage expert, with that expert supporting the notified text, including [11].	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>a group of very old trees, planted by ancestors, with thanks.</u>		
OS7.11	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Shared and recognised attributes and values' be amended to include the following sentence: <u>"Studholme Road South is used daily by many walkers, dog walkers, horse riders and bikers."</u>	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the shared and recognised values associated with 21.23.7 is appropriate.	Reject.
OS7.12	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Naturalness attributes and values' be amended at paragraph 19 as follows: "Overall, there is a high level of naturalness with a predominance of natural, rather than built, elements; but human intervention as managed farmland and rural living is evident. <u>The dimension of the trees on this road is remarkable and the birds for all to see and hear.</u> "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[19] is appropriate.	Reject.
OS7.13	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Aesthetic attributes and values' be amended at paragraph 25 as follows:	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[25] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"The experience of all of the values identified above from public and private viewpoints, particularly from the Studholme Road South, which is a public road, well used by locals for recreation and wellness."		
OS7.14	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Aesthetic attributes and values' be amended at paragraph 26c as follows: "the distinctly rural character of the area deriving from the dominant pastoral land uses, a sense of spaciousness and the very limited level of built development integrated by vegetation, which collectively forms a marked contrast to the neighbouring urban land use. This includes Studholme Road South where the rural look and integration with trees creates a particularly pleasing landscape and natural feel."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[26](c) is appropriate.	Reject.
OS7.15	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Summary of Landscape Values' paragraph 27 be amended from "Moderate physical values" to "High physical values".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[27] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS7.16	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Summary of Landscape Values' be amended at paragraph 28 as follows: "Moderate High associative values relating to the mana whenua associations of the area, the historic heritage of European pastoral farming, and the shared and recognised values of the area as 'greenbelt' on the southwestern edge of Wanaka, as a spacious rural transition between the urban area and mountains and as an area of rural working character. <u>Studholme road south, with its abundance of trees and open space is a particularly important existing greenbelt.</u> "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[28] is appropriate.	Reject.
OS7.17	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Summary of Landscape Values' be amended at paragraph 29 from "Moderate perceptual values" to "Very high perceptual values".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.7[29] is appropriate.	Reject.
OS7.19	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' vii. mineral extraction be amended as follows:	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the 21.23.7 notified text in relation	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"vii. Mineral extraction - very limited no landscape capacity, <u>any intrusion of big machinery would create scars visible from miles away.</u> for farm-scale quarries within the area that maintain or enhance the quality of views, naturalness values and aesthetic values. "	to the landscape capacity and qualifying comments for mineral extraction is appropriate.	
OS7.20	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' xii. rural living be amended as follows: "xii. Rural living - extremely limited or no landscape capacity to absorb additional rural living;. <u>Extremely limited capacity for more lifestyle living.</u> given that the area has been earmarked for urban expansion in the QLDC 2024 Spatial Plan and rural living development is likely stymie efficient urban use in the future. "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the 21.23.7 notified text in relation to the landscape capacity and qualifying comments for rural living is appropriate.	Reject.
OS7.21	Florence Micoud	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' be amended to introduce a new paragraph as follows: "xiii. <u>Develop the Western-Southern Studholme road area as a greenbelt,</u> encouraging landowners to	The submission point amounts to stating a future policy intention for the area which is beyond the scope of the Variation.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>enhance the natural value and share part of their lands with the public for footpath/bike or local food growing."</u>		
OS7.22	Florence Micoud	Oppose	<p>That landscape schedule 21.23.7 (Studholme Road) 'Plant and Animal Pests' be amended as follows:</p> <p>Plant and Animal Pests B</p> <p>A. ...</p> <p><u>B1: Native wildlife: Skinks, wide variety of insects and worms, pied oystercatcher, kingfisher, spurwing plover, Australasian harrier, paradise shelduck, tui, bellbird, fantail, silvereve and a ruru/morepork has been heard last year.</u></p> <p><u>B2: exotic wildlife quails, little owl, yellow hammer, blackbirds, song thrush, chaffinch, goldfinch, sparrow, starling, other finches, frogs</u></p> <p><u>B3. Animal pest species include rabbits, stoats, feral cats, possums, hedgehogs, rats, and mice, managed by trapping and other ways by private owners.</u></p>	This section of the schedule is deliberately aimed at identifying relevant plant and animal pests in the area to assist with guiding appropriate landscape management in the future, as part of plan implementation processes. Therefore, I do not consider that listing non-pest species is appropriate.	Reject.
OS7.23	Florence Micoud	Oppose	That the view of Studholme Road showing the undulating, mature trees effectively hiding the houses	It is considered that this matter is already addressed by 21.23.7[18].	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			(as described in the submission) be integrated into landscape schedule 21.23.7 (Studholme Road).		
OS7.25	Florence Micoud	Oppose	That the small protected areas (described in the submission) are connected to form a longer green belt that creates much needed natural areas close to the urban area, both for wildlife and people.	The intention of the UCLS Variation is to relate to RCL or Clutha Mata-au ONF land. The balance of the land on Studholme Road referred to by the submitter is not RCL and is therefore not relevant to the current Variation.	Reject.
OS22.3	Dan Curley, Deborah and Stephen Brent	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' vi. farm buildings be amended to remove descriptive words that are not defined, like 'modestly scaled'.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the qualifying comments for farm buildings is appropriate. I also note that this terminology has been confirmed in the existing PALS (confirmed by Environment Court Consent Determination and Orders).	Reject.
OS22.4	Dan Curley, Deborah and Stephen Brent	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' viii. transport infrastructure be amended to remove descriptive words, including modest scale and low key.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the qualifying comments for transport infrastructure is appropriate.	Reject.
OS22.5	Dan Curley, Deborah and Stephen Brent	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' xii. Rural living be amended as follows:	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the qualifying comments for rural living is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"extremely limited or no some landscape capacity...".		
OS30.1	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) be amended to exclude the properties legally described as Lots 1, 2 and 3 DP 23940.	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). There is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting.	Reject.
OS30.2	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) be removed from the proposed Variation, if the submitters property (Lots 1, 2 and 3 DP 23940) is not excluded from the schedule.	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). There is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting.	Reject.
OS30.3	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) be amended to follow a more logical and defensible boundary which properly encapsulates the character, landscape, and other variables of the area.	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). For this UCLS area, the boundaries of the RCL are defined by urban zoned land, Rural Lifestyle zoned land and Rural zoned land to which an ONL overlay applies.	Reject.
OS30.4	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) wording be amended to more accurately reflect the character of the area.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7 is generally accurate (subject to any minor changes recommended in response to other submission points on 21.23.7).	Reject.
OS30.5	Rosie Hill, DEBORAH AND	Oppose	That landscape schedule 21.23.7 (Studholme Road)	Refer response to OS30.4.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	STEPHEN BRENT as trustees of the HAWTHENDEN TRUST		be amended to address its lack of cohesion and irregularity.		
OS30.6	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) is opposed, particularly in relation to the proposed capacity assessments for urban expansion, rural living, farming, commercial recreation, and other appropriate development activities.	Refer response to OS30.4.	Reject.
OS30.10	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) be amended to more accurately recognise and provide for existing uses, and varying degrees of character, value and attributes.	Refer response to OS30.4.	Reject.
OS30.13	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'General description of the area' be amended as follows: "The Studholme Road area roughly corresponds to an irregularly shaped pocket of elevated land on the southwestern edge of Wanaka (including a sliver land sandwiched between the Alpha Range PA (ONL) and urban development on	The land adjoining the northern edge of the area is zoned urban and comprises urban scaled lots, so no text change is required in this regard. NB the changes recommended under OS30.15 address this matter.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			Heaton Park Drive). Urban residential land adjoins the north and northeast boundary. <u>Rural living lots not associated with working farm activities are included at the northern boundary of the area.</u> Rural Lifestyle zoned land adjoins the eastern side. The south and western edges abut the eastern edge of the upper Alpha Fan, which is part of the Mount Alpha PA (ONL)."		
OS30.14	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landforms and land types' be amended to include a new paragraph as follows: <u>4. "While largely occupied by properties consisting of working farms, the Schedule area also consists of smaller rural living lots at the northern boundary which, while having the same Rural zoning as the remaining Schedule area, have a distinct character as compared with the remaining Schedule area."</u>	This section of the schedules relates to landforms and land types (rather than land use), so no change to the text is considered appropriate in this regard.	Reject.
OS30.15	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Land use patterns and features' paragraph 9 be amended as follows:	Text amendments made to 21.23.7[9].	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	HAWTHENDEN TRUST		<p>"The majority of the area forms a small part of a much larger rural landholding (sheep and deer farming with some forestry). The area is dominated by working land use with only one smaller-scale rural living lots (approximately 3ha) evident. <u>It is noted that these rural living lots (being Lots 1, 2, and 3 DP 23940) do not correspond with the working land use of the remaining area, and are instead more associated with more urban surrounding sites, despite having the same Rural zoning.</u> A cluster of rural cottages and buildings is located roughly in the centre of the area. All of the rural and rural living buildings are well integrated by mature plantings which limits their visibility from outside the area."</p>		
OS30.16	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	<p>That landscape schedule 21.23.7 (Studholme Road) 'Shared and recognised attributes and values' be amended at paragraph 15 as follows:</p> <p>"Valued as pleasant working farmland with limited rural living (save for those rural living lots near the northern</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7[15] is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>boundary of the Schedule area) close to Wanaka, with a high level of visual and rural amenity."</u>		
OS30.17	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Remoteness/wildness attributes and values' paragraph 14 be amended as follows: "Rural tranquillity and quietness are currently experienced in parts of the area away from the urban edge where the levels of activity are consistent with 'working farmland' <u>save for those rural living lots near the northern boundary of the Schedule area, where the remoteness/wildness attributes and values are more akin to the nearby urban periphery of Wanaka."</u>	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7[24] is appropriate.	Reject.
OS30.18	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Aesthetic attributes and values' be amended at paragraph 26c as follows: "c. the distinctly rural character of the area deriving from the dominant pastoral land uses, a sense of spaciousness and the very limited level of built development (<u>save for those</u>	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7[26](c) is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<u>rural living lots near the northern boundary of the Schedule area) integrated by vegetation, which collectively forms a marked contrast to the neighbouring urban land use."</u>		
OS30.19	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' iii. urban expansions be amended as follows: " 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). <u>It is noted that those rural living lots near the northern boundary of the Schedule area are more closely associated with the adjoining existing urban areas on the Schedule area's north and northeastern outer boundaries."</u>	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALSs workstream), I consider that the 21.23.7 notified text in relation to urban expansion is appropriate.	Reject.
OS30.20	Rosie Hill, DEBORAH AND STEPHEN	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' xii.	Text amendments made to 21.23.7.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	BRENT as trustees of the HAWTHENDEN TRUST		rural living be amended as follows: "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."		
OS30.21	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Shared and recognised attributes and values' paragraph 15 describing the area as a working farmland being a shared and recognised attribute and value is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7[15] is appropriate.	Reject.
OS30.22	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Aesthetic attributes and values' paragraph 25a that describes the area as the larger, working rural backdrop between Wanaka and the Alpha Range is opposed and the properties should be distinguished from this context.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7[26](a) is appropriate.	Reject.
OS30.23	Rosie Hill, DEBORAH AND STEPHEN	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' iv.	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	BRENT as trustees of the HAWTHENDEN TRUST		intensive agriculture and vi. farm buildings capacity ratings are opposed.	Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for farm buildings and intensive agriculture is appropriate.	
OS30.24	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Landscape Capacity' ratings be revised if the terminology and definitions are retained as well as a corresponding scale of development to guide the implementation of this that reflect the full spectrum of available land uses anticipated, or available development capacity.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7 is generally accurate (subject to any minor changes recommended in response to other submission points on 21.23.7).	Reject.
OS30.25	Rosie Hill, DEBORAH AND STEPHEN BRENT as trustees of the HAWTHENDEN TRUST	Oppose	That landscape schedule 21.23.7 (Studholme Road) 'Summary of Landscape Values' paragraphs 27 and 28 are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text for 21.23.7 Summary of Landscape Values is appropriate.	Reject.

21.23.8 Riverbank Road

May 2026 FINAL

Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS15.5	Simon Peirce, Aurora Energy Limited	Oppose	That landscape schedule 21.23.8 (Riverbank Road) be amended to recognise the electricity sub-transmission infrastructure and significant electricity distribution infrastructure owned by Aurora Energy.	Text amendment made to s42A Version 21.23.8[11].	Accept.

21.23.9 Wānaka Airport Environs

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS26.2	Maddy Familton, SIO No12 Limited	Oppose	That the mapped extent of landscape schedule 21.23.9 (Wanaka Airport Environs) be amended to exclude the submitters land (Section 1 Block II Lower Wanaka SD).	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). There is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting.	Reject.
OS26.3	Maddy Familton, SIO No12 Limited	Oppose	That if the Variation is not rejected or the submitters land not excluded from the mapped area, then the text of landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' be amended to enable reasonable development by increasing the capacity assessments recorded as "Very Limited", "Extremely Limited", and "Extremely Limited or no" to at least "limited" but preferably "some" to better reflect the characteristics of the submitters land within landscape schedule 21.23.9 (Wanaka Airport Environs).	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments in 21.23.9 is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS26.5	Maddy Familton, SIO No12 Limited	Oppose	That the 'very limited', 'extremely limited' and 'extremely limited or no' land use capacities identified for various activities in landscape schedule 21.23.9 (Wanaka Airport Environs) are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments in 21.23.9 is appropriate.	Reject.
OS28.1	Ben Trotter, BLACK PEAK FARMING	Support	That the landscape values and description of values in landscape schedule for 21.23.9 (Wanaka Airport Environs) are supported.	Aligns with Council expert advice - no change required.	Accept.
OS28.2	Ben Trotter, BLACK PEAK FARMING	Oppose	That the subjective capacity interpretations for various activities in landscape schedule 21.23.9 (Wanaka Airport Environs) are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments in 21.23.9 is appropriate. The 21.23 Preamble may provide the submitter with some comfort as it explains how the schedules are intended to be used and the meaning of the capacity ratings (which are all aspects that are consistent with the PALS).	Reject.
OS28.3	Ben Trotter, BLACK PEAK FARMING	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' ratings are removed, or alternatively adjusted to cater for landscape uses which relate to farming, food production and tourism/farming accommodation.	Refer response to OS26.5.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS28.4	Ben Trotter, BLACK PEAK FARMING	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape capacity' ii. visitor accommodation and tourism related activities is amended from extremely limited to no landscape capacity, to some landscape capacity.	Refer response to OS26.5.	Reject.
OS28.6	Ben Trotter, BLACK PEAK FARMING	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) be amended to remove references to no landscape capacity for urban development.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to the landscape capacity rating for urban expansion is appropriate.</p> <p>The rating terminology (and meanings) were an issue that was extensively traversed in the expert conferencing for the PALS Council hearing, where the experts agreed that for many instances in rural environments, urban development <u>may</u> not be appropriate and it is therefore appropriate to signal that this <u>may</u> be the case in the lowest landscape capacity rating. The use of the word 'or' in the rating, effectively leaves the door ajar for a degree of capacity to be identified as part of a proposal specific assessment. This approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders).</p>	Reject.
OS28.7	Ben Trotter, BLACK PEAK FARMING	Oppose	That references to the capacity of landscapes for various land use options in landscape schedule 21.23.9 (Wanaka Airport Environs) are removed.	For reasons of methodological consistency with the existing PALS, it is appropriate to include references to landscape capacity.	Reject.
OS36.2	Maree Baker-Galloway, NW &	Oppose	That landscape schedule 21.23.9 Wanaka Airport	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	DJ Pittaway Family Trust		Environs be amended to exclude the submitters land (Lot 3 DP 26911 and part of Lot 1 DP 25276).	corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). There is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting.	
OS36.6	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That if there is no change to the maps for landscape schedule 21.23.9 (Wanaka Airport Environs), then the text of the schedule specify that the submitters land (Lot 3 DP 26911 and part of Lot 1 DP 25276) is excluded from landscape schedule 21.23.9 (Wanaka Airport Environs) in its entirety.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape values associated with 21.23.9 is appropriate.	Reject.
OS36.12	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) should be amended to recognise that the area has low physical, associative and perceptual values including due to the airport and the range of existing and consented activities within the wider area, and because the area lacks defensible edges due to the Wanaka Airport.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape values associated with 21.23.9 is appropriate. Further, the Wānaka Airport Outer Control Boundary noise management overlay effectively functions as a defensible edge (albeit based on land use management as opposed to a landscape feature, which is a less favoured, but nonetheless, accepted method for the delineation of defensible edges).	Reject.
OS36.13	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Shared and recognised attributes and values' paragraph 33 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the shared and recognised values associated with 21.23.9 is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS36.14	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Memorability attributes and values' paragraph 44 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the PALS workstream), I consider that the notified text in relation to the memorability values associated with 21.23.9 is appropriate.	Reject.
OS36.15	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Naturalness attributes and values' paragraph 42 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the naturalness values associated with 21.23.9 is appropriate.	Reject.
OS36.16	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Remoteness/wildness attributes and values' paragraph 47 be amended to remove all references to remoteness.	Text amendments made to 21.23.9[47] which may address the submitters concerns in this regard.	Accept in part.
OS36.17	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That the descriptions of landscape capacity should not read as policy direction with statements as to what mitigation is appropriate for activities, and what outcomes should be aimed for, and that any policy-type statements should be deleted.	The 21.23 Preamble explains that the schedules do not override PDP policies, standards or rules. The qualifying comments in the landscape capacity section of the schedules is intended to assist plan users and was supported by the landscape and planning experts in the PALS Council hearing process. This approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders).	Reject.
OS36.26	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) restriction on activities on the submitters	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			land (Lot 3 DP 26911 and part of Lot 1 DP 25276) based on landscape values, given the low level of naturalness and extent of modification by wide ranging land uses listed, including roading/farming/pastoral use is opposed.	workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments in 21.23.9 is appropriate. The 21.23 Preamble may provide the submitter with some comfort in this regard, as it explains how the schedules are intended to be used and that the schedules do not override PDP policies, rules and standards.	
OS36.27	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' vii. mineral extraction rating of 'very limited' landscape capacity rating, particularly 'farm scale quarries and expansion of existing quarries that maintain or enhance the quality of views, naturalness values and aesthetic values' is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for mineral expansion is appropriate.	Reject.
OS36.28	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' ii. visitor accommodation and tourism related activities be amended to some landscape capacity in the flat land above the river.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream, which both included field work), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for visitor accommodation and tourism related activities is appropriate.	Reject.
OS36.29	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' v. earthworks be	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			amended to some landscape capacity in the flat land above the river.	workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for earthworks is appropriate. The 21.23 Preamble may provide the submitter with some comfort in this regard, as it explains how the schedules are intended to be used and that the schedules do not override PDP policies, rules and standards.	
OS36.30	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' xii. rural living be amended to some landscape capacity in the flat land above the river.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for rural living is appropriate.	Reject.
OS36.31	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' viii. transport infrastructure be amended to some landscape capacity in the flat land above the river.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PA Schedules workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for transport infrastructure is appropriate.	Reject.
OS36.32	Maree Baker-Galloway, NW & DJ Pittaway Family Trust	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Landscape Capacity' iii. urban expansions be amended to some landscape capacity in the flat land above the river.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for urban expansions is appropriate.	Reject.
OS46.1	Scott Edgar, Silverlight Studios Ltd	Support	That landscape schedule 21.23.9 (Wanaka Airport Environs) is generally supported, subject to minor	The text of 21.23.9 has been amended in response to submissions, to reflect landowner knowledge, correct errors, align with the PALS approach etc, where supported by expert planning and landscape advice.	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			amendments to better reflect the consented environment.		
OS46.2	Scott Edgar, Silverlight Studios Ltd	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' is opposed in part.	Refer response to OS46.11.	Accept in part.
OS46.3	Scott Edgar, Silverlight Studios Ltd	Support	That the acknowledgement of the consented film studio activities at paragraph 15 of landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' is supported.	Aligns with Council expert advice - no change required.	Accept.
OS46.4	Scott Edgar, Silverlight Studios Ltd	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' be amended at paragraph 15 to recognise that the greens area of the film studio development consented under RM220580 will be screened by vegetation and topography, but not to the extent that it will not be visible from State Highway 6.	Text amendments made to 21.23.9[15].	Accept.
OS46.5	Scott Edgar, Silverlight Studios Ltd	Support	That the description of land use activities in the wider area set out in paragraph 22 of landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' is supported.	Aligns with Council expert advice - no change required.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS46.6	Scott Edgar, Silverlight Studios Ltd	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' be amended at paragraph 22 to acknowledge the consented film studio activities.	Refer response to OS46.11.	Accept.
OS46.7	Scott Edgar, Silverlight Studios Ltd	Oppose	That the description of 'Naturalness attributes and values' set out in landscape schedule 21.23.9 (Wanaka Airport Environs) is opposed.	Refer response to OS46.9.	Accept in part.
OS46.8	Scott Edgar, Silverlight Studios Ltd	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' be amended at paragraph 15 as follows: "Film studio development is anticipated throughout the rolling moraine landform at the western end of the area. The development will <u>largely</u> be screened from SH6 and the river corridor by topography; <u>except where it is on the flat paddocks adjacent to the highway where it will be screened by existing and consented vegetation.</u>	Refer response to OS46.4.	Accept in part.
OS46.9	Scott Edgar, Silverlight Studios Ltd	Oppose	That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Naturalness attributes and values' be	Text amendment made to 21.23.9[42].	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>amended at paragraph 42 as follows:</p> <p>“Perceptions of naturalness end of working rural character are largely maintained for people visiting the landscape, although this is undermined to some extent by the presence of the airport and associated development (effectively forming a ‘cut out’ within the area), pivot irrigation, infrastructure driveways, gateways and signage. <u>The implementation of the consented film studio activities within and adjacent to the priority area will contribute to this somewhat reduce perception of naturalness.</u>”</p>		
OS46.11	Scott Edgar, Silverlight Studios Ltd	Oppose	<p>That landscape schedule 21.23.9 (Wanaka Airport Environs) 'Land use patterns and features' be amended at paragraph 22e as follows:</p> <p>"Halliday Road Corbridge PA (RCL) to the northwest characterised by a mix of pastoral farming, cropping, and established rural living and visitor accommodation. Consented film studio development dominates the portion of the PA adjacent</p>	Text amendment made to 21.23.9[22](e).	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			the area- and extends into the western end of the area."		

21.23.10 Northern End of Criffel / Pisa Range Foothills

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS15.1	Simon Peirce, Aurora Energy Limited	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel / Pisa Range Foothills) be amended to recognise the electricity sub-transmission infrastructure and significant electricity distribution infrastructure owned by Aurora Energy.	Text amendment made to s42A Version of 21.23.10[13].	Accept.
OS16.1	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Land use patterns and features' paragraph 12 is amended to recognise approved consents for rural living throughout the scheduled area, and as a consequence, that related descriptions including visual/perceptual assessment are also amended.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream) and including review of QLDC GIS mapping with approved building platforms, I consider that the notified text in relation to 21.23.10 is appropriate. The submitter is encouraged to provide evidence as to why the text should be changed.	Reject.
OS16.2	Dan Curley, Lake McKay	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Land use patterns and	Amendments have been made to s42A Version of 21.23.10[13], excepting in relation to the 'have a go' reference (as this is covered by the existing notified text reference to commercial recreation) and the visitor pods (as these are	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	2024 Limited Partnership		features' is amended to recognise 'Have a go' commercial activities (9 Mt Barker Rd), strawberry farm retail (RM210663); firewood plan (RM230996), Rural Industrial Zone (5000m2 + buildings), and Visitor Accom Pods RM240202.	located in the ONL, outside the mapped area of 21.23.10). The submitter is encouraged to provide evidence with respect to the location of the Rural Industry zoned land within the mapped area, as this would appear to be outside the mapped area.	
OS16.3	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Mana whenua features and their locations' paragraph 17 be amended to provide site specific features, their location and values within the scheduled area, rather than the current broad nature of including generally 'everything'.	No technical evidence is provided in support of this submission point. The schedules have been reviewed by Aukaha, with Aukaha supporting the notified text.	Reject.
OS16.4	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'shared and recognised attributes and values' at paragraph 21 be amended to include the words 'Parts of the landscape', as follows: "Parts of the landscape are valued as part of the scenic rural approach to Wanaka (from the east) and Luggate (from the west) via SH6."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the shared and recognised values of the area is appropriate. It should also be noted that the 21.23 Preamble acknowledges that site specific assessments will be required and may identify parts of a site or UCLS area that have different landscape values which may provide the submitter with some comfort in this regard.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS16.5	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Particularly important views to and from the area' paragraph 24 is amended to accept some approved consents will modify these views as described.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.10[24] is accurate and appropriate.	Reject.
OS16.6	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Particularly important views to and from the area' paragraph 29 is amended to include the word 'Existing' as follows: " Existing Buildings are generally subservient and well-integrated by landform and/or vegetation in such views."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.10[29] is accurate and appropriate.	Reject.
OS16.7	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' iii. urban expansions be amended to include the words 'unless by re-zoning', as follows: "extremely limited or no landscape capacity unless by re-zoning ."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the capacity for urban expansion is appropriate. In my opinion, it goes without saying that if land were rezoned to urban, the landscape capacity would change. As the 21.23 Preamble explains, the schedules identify, at an area level, the landscape capacity for various land uses at a certain point in time.	Reject.
OS16.9	Dan Curley, Lake McKay	Oppose	That landscape schedule 21.23.10 (Northern End of	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	2024 Limited Partnership		Criffel/Pisa Range Foothills) 'Landscape Capacity' v. Earthworks be amended to remove reference to farming.	Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for earthworks is appropriate. It should be noted that the 21.23 Preamble explains that the schedules are not a replacement for any relevant policies, rules or standards in the PDP.	
OS16.10	Dan Curley, Lake McKay 2024 Limited Partnership	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' xii. Rural living be amended to reflect large tracts of the scheduled area having 'some capacity' and the areas that do contribute to associative and perceptual (for example those parts visible from the State Highway) having 'very limited' capacity.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for rural living is appropriate. It is also noted that, from a landscape perspective, the appropriateness of rural living in an area relates to more than simply visual considerations.	Reject.
OS31.2	Maddy Familton, Bell Group Limited	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) should be modified to recognise that farming practices should not be locked into a particular set of landscape values that will potentially limit the extent to which the land can be farmed efficiently and effectively, or enable farming practices to evolve and change the landscape overtime.	This matter was addressed extensively at the PALS Council hearing, resulting in amendments to the 21.23 Preamble to acknowledge that the schedules are not intended to lock in land uses over time and that values and capacity can change over time. This approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders). For these reasons, no text changes are considered necessary in this regard.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS31.4	Maddy Familton, Bell Group Limited	Oppose	<p>That landscape schedule 21.23.10 (Northern End of Criffel Range/Pisa Range Foothills) 'Landscape Capacity' i. commercial recreation activities be amended as follows:</p> <p>"Commercial recreational activities – some landscape capacity for small-scale and low-key activities that: integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate)."</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for commercial recreation is appropriate. This is in part due to the very broad range of activities that this activity covers under the PDP Chapter 2 definition referenced in the 21.23 Preamble.</p>	Reject.
OS31.5	Maddy Familton, Bell Group Limited	Oppose	<p>That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' ii. visitor accommodation and tourism related activities be amended as follows:</p> <p>Visitor accommodation and tourism related activities – limited some landscape capacity for activities that are located to optimise the</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for visitor accommodation and tourism related activities (which corresponds to a Resort, as defined in PDP Chapter 2) is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character ; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). Extremely limited some landscape capacity for small-scale and low-key tourism-related activities that are: visually recessive; designed to be small scale and have a low key 'rural' character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).		
OS31.6	Maddy Familton, Bell Group Limited	Support	That the landscape capacity rating for intensive agriculture set out in landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' iv. intensive agriculture is retained as notified.	Aligns with Council landscape expert recommendations – no change required.	Accept.
OS31.7	Maddy Familton, Bell Group Limited	Oppose	That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' v.	Refer response to OS16.9.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>earthworks be amended as follows:</p> <p>"limited some landscape capacity to absorb earthworks associated with trails, farming and rural living/visitor accommodation/tourism related activities that maintain naturalness and expressiveness values and integrate with existing natural landform patterns.</p>		
OS31.8	Maddy Familton, Bell Group Limited	Oppose	<p>That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' vi. farm buildings be amended as follows:</p> <p>"Farm buildings – some landscape capacity for modestly scaled buildings that reinforce <u>complement</u> the existing rural character."</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for farm buildings is appropriate.</p>	Reject.
OS31.9	Maddy Familton, Bell Group Limited	Oppose	<p>That landscape schedule 21.23.10 (Northern End of Criffel/Pisa Range Foothills) 'Landscape Capacity' xii. rural living be amended as follows:</p> <p>"Rural living – very limited landscape capacity to absorb additional rural living without adverse effects on associative and perceptual values. The working rural</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for rural living is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>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; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and '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."</p>		

21.23.11 East of Luggate

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS43.2	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landforms and land types' is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.11 was reviewed by an expert geomorphologist with that expert supporting the notified text. NB Response to OS43.3 is likely to address this submission point.	Accept in part.
OS43.3	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) should be amended to acknowledge the presence and value of gravels as a resource within the priority area.	Text amendment made to s42A Version of 21.23.11[4].	Accept.
OS43.4	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Ecological features and vegetation types' paragraph 9a. is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.11 was reviewed by an expert ecologist with that expert supporting the notified text. NB Response to OS43.5 is likely to address this submission point.	Accept in part.
OS43.5	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Ecological features and vegetation types' paragraph	Text amendment made to s42A Version of 21.23.11[9](a).	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			9a inaccurately estimates the size of existing woodlots in the schedule area and should be amended from 1 to 3 hectares in area to 5 hectares in area.		
OS43.6	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Land use patterns and features' is opposed.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to the land use patterns and features is appropriate, aside from where I recommend changes.</p> <p>NB Response to OS43.7, OS43.8 and OS43.10 are likely to address this submission point.</p>	Accept in part.
OS43.7	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Land use patterns and features' paragraph 12 should be amended to accurately describe the area of the Luggate Farm as 240 hectares rather than 120 hectares.	Text amendment made to s42A Version of 21.23.11[12].	Accept.
OS43.8	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Land use patterns and features' be amended to reference the consented small scale solar electricity generation facility.	Text amendment made to s42A Version of 21.23.11[12].	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS43.9	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) description of existing and consented rural living is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to existing and consented rural living is generally appropriate. NB Response to OS43.10 is likely to address this submission point.	Accept in part.
OS43.10	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) should be amended to acknowledge the presence of the existing homestead and farm workers accommodation.	Text amendment made to s42A Version of 21.23.11[13] to acknowledge homestead and workers accommodation and remove confusion around consented but unbuilt rural living (which has been built, since the schedule was first drafted).	Accept.
OS43.11	Scott Edgar, Scott Aubrey Family Trust	Support	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' iv. intensive agriculture rating of "some landscape capacity" is retained as notified.	Aligns with Council landscape expert recommendations – no change required.	Accept.
OS43.12	Scott Edgar, Scott Aubrey Family Trust	Support	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' vi. farm buildings rating of "some landscape capacity" is retained as notified.	Aligns with Council landscape expert recommendations – no change required.	Accept.
OS43.13	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' vii. mineral extraction rating of	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream and the PALS workstream (which both included field work), I consider that the notified text	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"limited landscape capacity" is opposed.	in relation to the landscape capacity rating for mineral extraction is appropriate.	
OS43.14	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' vii. mineral extraction be amended such that it is consistent (i.e., limited capacity) for minerals extracted from the river and processed/stockpiled within the priority area and minerals extracted from the priority area itself.	No technical evidence is provided in support of this submission point. The text of 21.23.11 acknowledges capacity for farm scale quarries. This land use is defined in the 21.23 Preamble. The submitter is encouraged to provide further detail with respect to the existing consented extraction activities occurring in the area that do not align with the definition of farm quarries. Further, the reference to gravel extraction in the adjacent river, is in recognition of the likelihood that this would impact on the area to at least some degree (e.g. stockpiling). It is understood that gravel extraction from the river is typically, at least in part, about flood protection and for this reason, it does not form a basis for assuming that there is the same level of landscape capacity for gravel extraction in the area.	Reject.
OS43.15	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) should be amended to remove the reference to farm-scale quarries and replace it with a more general acknowledgement that the scale of mineral extraction should be managed.	Refer response to OS43.14.	Reject.
OS43.16	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' x. renewable energy generation rating of "some landscape capacity" is retained as notified.	Aligns with Council landscape expert recommendations – no change required.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS43.17	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' xii. rural living rating of "very limited landscape capacity" is opposed in part.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to rural living landscape capacity and qualifying comments is generally appropriate. NB Response to OS43.18 is likely to address this submission point to some degree.	Accept in part.
OS43.18	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' xii. rural living be amended so that rural living development in proximity to the Outstanding Natural Feature does not compromise the landscape values of the Outstanding Natural Feature, rather than applying the "reasonably difficult to see" test to development within the Rural Character Landscape.	Text amendment made to s42A Version of 21.23.11[xii].	Accept.
OS43.19	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' xii. rural living be amended to have a more nuanced approach for the capacity rating whereby further rural living development may be appropriate where some, but	Refer response to OS43.18.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			not all of the circumstances are met.		
OS43.20	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) should be amended to more clearly describe the values of the priority area, and in some cases, better acknowledge the landscape capacity of certain activities.	Amendments have been made to 21.23.11 in response to submissions, in so far as they are supported by expert landscape and planning advice.	Accept in part.
OS43.21	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landforms and land types' paragraph 4 be amended as follows: "The relatively free-draining brown and pallic soils with reasonable fertility reflected in pastoral farming and more intensive farming under irrigation <u>and underlain by good gravels.</u> "	Refer response to OS43.3.	Accept.
OS43.22	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Ecological features and vegetation types' paragraph 9a be amended as follows: "Conifer, eucalypt, and Lombardy poplar shelter belts throughout the area and scattered eucalypt or conifer woodlots generally around 1- 3ha <u>5ha</u> in size."	Refer response to OS43.5.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS43.23	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Land use patterns and features' paragraph 12 be amended as follows: "Pastoral farming or cropping, with K-line or pivot irrigation. The area includes a large farm located between SH6 and the Mata-au (Clutha River) in the order of 420ha <u>240ha</u> used for cattle or dairy support farming <u>with an associated homestead, farm worker accommodation and small scale solar electricity generation.</u> The <u>priority area also includes</u> small scale orcharding, poultry farming and a clean fill. Properties tend to be larger than 20ha with large-scale farm buildings, stockyards."	Refer response to OS43.7 and OS43.10.	Accept.
OS43.24	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Land use patterns and features' paragraph 13 be reworded to clarify and accurately describe the existing and consented rural living within the priority area.	Refer response to OS43.8.	Accept.
OS43.25	Scott Edgar, Scott Aubrey Family Trust	Oppose	That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' vii.	Refer response to OS43.14.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>mineral extraction be amended as follows:</p> <p>"Mineral extraction – limited landscape capacity for ongoing gravel extraction from the Mata-au (Clutha River) in accordance with Otago Regional Council River Management Strategy (<u>being the stockpiling, processing and transportation of gravel sourced from the river on land within the priority area</u>) and Very limited landscape capacity for farm-scale quarries elsewhere within the area that maintain or enhance the quality of views, naturalness values and aesthetic values."</p>		
OS43.26	Scott Edgar, Scott Aubrey Family Trust	Oppose	<p>That landscape schedule 21.23.11 (East of Luggate) 'Landscape Capacity' xii. rural living be amended as follows:</p> <p>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 of</p>	Refer response to OS43.18 and OS43.19.	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>Mata – Au (Clutha River) and across the schistose/moraine landform in the north-western portion of the area. It is important that new development along the edge of Mata – Au (Clutha River) PA and on the <u>schistose/moraine within the area</u> is difficult to see from the ONF, to protect does not compromise the associative and perceptual values of the ONF and .It is also important that development on the schistose/moraine within the area, is difficult to see from the Mata – Au (Clutha River) PA, to protect the associative and perceptual values of the ONF and ensure that it does not read as development creep from the existing settlement pattern in the area. More generally, any additional rural living should be set well back from roads and public tracks and/or co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and spacious, 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); enhance public</p>		

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			access (where appropriate); and should maintain the impression of expansive rural views from public vantage points.		

21.23.12 Sheepskin Creek

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS40.2	Louise Aubrey, Kyle Wills	Oppose	That the very limited, extremely limited, some limitations, limited, and extremely limited or no land use capacities identified for various activities in landscape schedule 21.23.13 (Sheepskin Creek) are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream, and the PALS workstream, which included landscape expert conferencing on the capacity rating scale, I consider that the landscape capacity rating scale used in the schedules appropriate.	Reject.
OS40.3	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Hydrological features' paragraph 3 is opposed as it is incorrect.	No technical evidence is provided in support of this submission point. The submitter is encouraged to provide specific text amendments with respect to the hydrological features of the area.	Reject.
OS40.4	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Particularly noteworthy indigenous vegetation' paragraph 4a be removed, or that the wording be amended to reflect the use of this exotic vegetation by indigenous fauna species.	No technical evidence is provided in support of this submission point. The text of 21.23.12 was reviewed by an expert ecologist, with that expert supporting the notified text, including [4](a).	Reject.
OS40.5	Louise Aubrey, Kyle Wills	Oppose	That the reference to the evergreen shelterbelt in	Text amendments made to 21.23.4b	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			landscape schedule 21.23.12 (sheepskin Creek) 'Particularly noteworthy indigenous vegetation' in paragraph 4b be removed.		
OS40.6	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Land use patterns and features' be amended at paragraph 7 to note that the intensity of grazing and cropping under the pivoted area is high intensity rather than low, and that the remaining area of improved pasture be medium intensity rather than low.	Text amendments made to 21.23.12[7].	Accept.
OS40.7	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Land use patterns and features' be amended at paragraph 8 to include reference to pivots and roofed stock yards as built modifications.	Text amendments made to 21.23.12[8].	Accept.
OS40.8	Louise Aubrey, Kyle Wills	Oppose	That paragraph 9b of landscape schedule 21.23.12 (Sheepskin Creek) be amended to note that there are significant areas of the Lake Mckay Outstanding Natural Landscape that are improved pastures, with some areas irrigated.	There is a separate PA Schedule for Lake McKay ONL that addresses the points referenced by the submitter and for this reason, no text change is considered appropriate in the 21.23.12 schedule.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS40.9	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Historic attributes and values' be amended at paragraph 13 to remove reference to the highlighted land being a high-country landscape.	No technical evidence is provided in support of this submission point. The text of 21.23.12 was reviewed by a heritage expert, with that expert supporting the notified text, including 21.23.6 [13]. The submitter is encouraged to provide evidence on this matter as to why, in their view, the notified text should be amended.	Reject.
OS40.10	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Shared and recognised attributes and values' paragraph 17 be removed or amended to note that the majority of the area consists of developed pasture, a large proportion of which is irrigated.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the wording of 21.23.12[17] is appropriate. I consider that the reference to a predominantly working rural landscape buffer alludes to the developed pasture, much of which is under irrigation. Further, as the 21.23 Preamble explains, the schedules are to be read as a whole and the reference to pivot irrigation as a modifying landscape element is clearly signalled elsewhere in the schedule.	Reject.
OS40.11	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Particularly important views to and from the area' paragraph 20 be amended to remove reference to there being public access available to the highlighted area.	21.23.12 references 'limited public accessibility' reflecting the road and track network shown on LINZ Topographic mapping. The submitter is encouraged to provide evidence on this matter as to why, in their view, the notified text should be amended.	Reject.
OS40.12	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Particularly important views to and from the area' paragraph 21 be amended to remove reference to the	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the wording of 21.23.12[21] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			highlighted area being widely visible.		
OS40.13	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Particularly important views to and from the area' paragraph 21 be amended to remove reference to the rough vegetated escarpments.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the wording of 21.23.12[21] is appropriate.	Reject.
OS40.14	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Naturalness attributes and values' paragraph 24 be amended to note that the highlighted area has a low to moderate level of naturalness as opposed to a moderate to high level of naturalness.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the wording of 21.23.12[24] is appropriate. The text acknowledges the influence of the intensively managed farmland and rural living and explains that the close proximity of the more undeveloped mountain context contributes a moderating (or counterbalancing) influence with respect to the perception of naturalness.	Reject.
OS40.15	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Transient attributes and values' paragraph 27 be amended to remove reference to changing snow cover as a transient value of the highlighted area.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the wording of 21.23.12[27] is appropriate.	Reject.
OS40.16	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Landscape Capacity' iv. intensive agriculture be amended as it is incorrect.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the rating of some landscape	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
				capacity for intensive agriculture is appropriate. I note that this is the highest landscape capacity rating available.	
OS40.17	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Landscape Capacity' xi. forestry be amended as it is incorrect.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the rating of limited landscape capacity for forestry is appropriate given the paucity of forestry in the area and the openness and elevated nature of much of the area, adjoining an ONL which collectively makes it reasonably sensitive to land use change of this nature.	Reject.
OS40.18	Louise Aubrey, Kyle Wills	Oppose	That landscape schedule 21.23.12 (Sheepskin Creek) 'Landscape Capacity' xii. rural living be amended from very limited to high or very high landscape capacity.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the rating of very limited landscape capacity for rural living is appropriate. Also refer to OS40.2 and my EIC discussion of the landscape capacity rating scale.	Reject.

21.23.13 Kane Road and Luggate-Tarras Highway

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS9.1	Tom Overton, Grandview Grazing Limited	Oppose	That the descriptions of landforms, land use patterns and features, landscape values, and landscape capacity in Schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) are amended to be less prescriptive, or that a disclaimer is included to note that they do not account for local scale variability.	The submitter is referred to the 21.23 Preamble which explains that the schedules address the landscape values of the area as a whole and do not apply to specific sites. Instead, they are relatively high level and intended as a starting point for plan users. Further, the Preamble explains that a site-specific assessment required as part of an application, may identify different values that may guide appropriate development on a site. For these reasons, no changes to 21.23.13 are required in this regard.	Reject.
OS9.2	Tom Overton, Grandview Grazing Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape capacity' be amended so there is no comment on the capacity of activities which are permitted within the Zone.	The schedules do not address the landscape capacity of activities that are permitted within the area. The 21.23 Preamble explains that the schedules are only considered for resource consent (which excludes permitted activities), and that the schedules do not override PDP policies, rules or standards. For these reasons, no changes to 21.23.13 are required in this regard. Also see s42A Report.	Reject.
OS9.3	Tom Overton, Grandview Grazing Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape capacity' v. be amended to remove earthworks from the	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13'v Earthworks' is appropriate. It is also noted that	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			landscape capacity section so that there is no limit on earthworks.	21.23 Preamble explains that the schedules do not replace relevant PDP policies, rules or standards. Also see s42A Report.	
OS9.4	Tom Overton, Grandview Grazing Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape capacity' be amended to remove farm buildings from the landscape capacity section.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13'vi Farm buildings' is appropriate. It is also noted that 21.23 Preamble explains that the schedules do not replace relevant PDP policies, rules or standards.	Reject.
OS9.5	Tom Overton, Grandview Grazing Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape capacity' vii. mineral extraction be amended from limited to some landscape capacity.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13'vii Mineral extraction' is appropriate.	Reject.
OS9.6	Tom Overton, Grandview Grazing Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape capacity' xii rural living be amended to note that there are some site-specific locations with some landscape capacity for rural living, particularly within proximity of existing rural living development.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13 'xii Rural living' is appropriate. Also see BG EIC discussion of this matter.	Reject.
OS9.7	Tom Overton, Grandview Grazing Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape capacity' xii. rural living be amended to remove the requirement for	Refer response to OS9.6.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			rural living to be "set well back from roads".		
OS11.6	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Land use patterns and features' paragraphs 11, 12, 13, and 14 should be amended as they describe how the land is managed by the occupiers at present, but not how the land was farmed in the past, and likely not how the land will be farmed in the future.	The 21.23 Preamble explains that the schedules record landscape values and capacity at a point in time and acknowledges that each may change over time. Important past landscape management patterns etc that may influence landscape values tend to be recorded under the Historic attributes and values section of the schedule. It is acknowledged that farming practices may change over time and for this reason the 21.23 Preamble explains that the schedules are not intended to lock in existing land uses. Also see BG EIC discussion of this matter.	Reject.
OS11.7	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Land use patterns and features' paragraph 15b should be amended to recognise the that the view in the opposite direction is in stark contrast with the presence of the Wanaka Airport and its associated infrastructure, Kane Road servicing the dramatically enlarged Hawea township, the very busy Tarras-Luggate-Wanaka highway, the Queensbury residential developments, Luggate, and the intensive farming activities behind Luggate.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[15] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS11.8	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Shared and recognised attributes and values' paragraph 33 should be amended to recognise the intensively populated nature of the adjacent land which includes the urban areas of Albert Town, Wanaka, Hawea, Luggate, and the rural lifestyle blocks of Hawea Flat and the Airport.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[33] is appropriate.	Reject.
OS11.9	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road Luggate - Tarras Highway) 'Legibility and expressiveness attributes and values' paragraph 39 be amended to recognise that these landforms are not exclusive to the scheduled land.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[39] is appropriate. It is also noted that 21.23.13 was reviewed by a geomorphology expert, with that expert supporting the notified text.	Reject.
OS11.10	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road Luggate - Tarras Highway) 'Legibility and expressiveness attributes and values' paragraph 40 be amended to recognise that these landforms are not exclusive to the scheduled land.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[40] is appropriate. It is also noted that 21.23.13 was reviewed by a geomorphology expert, with that expert supporting the notified text.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS11.11	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road Luggate - Tarras Highway) 'Legibility and expressiveness attributes and values' paragraph 41 be amended to recognise that these landforms are not exclusive to the scheduled land.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[41] is appropriate. It is also noted that 21.23.13 was reviewed by a geomorphology expert, with that expert supporting the notified text.	Reject.
OS11.12	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road Luggate - Tarras Highway) 'Particularly important views to and from the area' paragraph 42 be amended to recognise that the view described is an intensively farmed dairy area not dissimilar to many areas of the Canterbury Plains, and that there is an ever-present influence of the highways and the Airport, which contradict the narrative in this section.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[42] is appropriate and adequately references the intensive rural land use of the area.	Reject.
OS11.13	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Particularly important views to and from the area' paragraphs 43 to 46 are opposed as they are subjective.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[43] to [46] is appropriate. Further, the Methodology Report explains that the UCLS have been prepared in accordance with <i>Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines</i> which is a method used by landscape experts across the country and is relied on by the	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
				Environment Court, to guide the evaluation of visual amenity related matters.	
OS11.14	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Remoteness/wildness attributes and values' paragraph 53 be amended to recognise that it is an intensive farming area surrounded by urban and semi-rural subdivisions which are not considered remote or wild.	Text amendments made to 21.23.13[53].	Accept in part.
OS11.15	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Remoteness/wildness attributes and values' paragraph 54 be amended to recognise the lights and activities from the airport and highways, the glow of surrounding towns, skifields, rural settlements (e.g., Queensbury) and cowsheds and other farming activities such as pivot blinking lights which are present for most of the night.	Text amendments made to 21.23.13[54].	Accept in part.
OS11.16	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Summary of Landscape Values' paragraph 57 should be amended to recognise	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[57] is appropriate. The various modifications	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			that the schedule land is intensive productive farmland with associated buildings watering pivots and houses and the landscape appearance of the schedule land has altered in the past and will alter again in the future.	mentioned in the submission has been factored into the 'moderate' values rating for physical landscape values.	
OS11.17	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Summary of Landscape Values' paragraph 58 should be amended to recognise that the schedule land is intensive productive farmland with associated buildings watering pivots and houses and the landscape appearance of the schedule land has altered in the past and will alter again in the future.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[58] is appropriate. The various modifications mentioned in the submission has been factored into the 'moderate' values rating for associative landscape values.	Reject.
OS11.18	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Summary of Landscape Values' paragraph 59 should be amended to recognise that the schedule land is intensive productive farmland with associated buildings watering pivots and houses and the landscape appearance of the schedule land has altered in the past	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[59] is appropriate. The various modifications mentioned in the submission has been factored into the 'moderate' values rating for perceptual landscape values.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			and will alter again in the future.		
OS11.19	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' i. commercial recreation activities be amended so that there are no restrictions on commercial recreation activities.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for commercial recreation activities is appropriate. I also note that commercial recreation activities have been allocated with the highest landscape capacity rating (i.e. 'some').	Reject.
OS11.20	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' ii. visitor accommodation and tourism related activities be amended so that there are no restrictions on tourist accommodation.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for visitor accommodation and tourism related activities is appropriate. I also note that visitor accommodation activities have been allocated with the highest landscape capacity rating (i.e. 'some') and the 21.23 Preamble explains that tourism related activities refer to Resorts. Also see s42A Report.	Reject.
OS11.21	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' iii. urban expansions be amended so that there is infinite landscape capacity for urban development.	No technical evidence is provided in support of this submission point. It was acknowledged by all of the landscape experts in expert conferencing for the PALS (Council) hearing, that the lowest capacity rating used in the schedules needed to signal that in certain circumstances there may be no landscape capacity for an activity. Urban expansion is typically one such activity, due to the significant landscape character transformation associated with this sort of development in a rural landscape context. However, as explained in the 21.23 Preamble, a site-specific landscape assessment as part of a plan change or resource consent application, may determine different landscape values and capacity to that identified in the	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
				<p>schedule (which relates to the area as a whole). In my opinion this guidance along with the deliberate wording of 'extremely limited or no' landscape capacity, effectively leaves the door ajar for such development to be considered at some time in the future.</p> <p>For these reasons, I do not support the text changes requested by the submitter.</p> <p>Also see s42A Report.</p>	
OS11.22	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' iv. intensive agriculture be amended so that further intensive agriculture is encouraged.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for intensive agriculture is appropriate. I also note that intensive agriculture has been allocated with highest landscape capacity rating (i.e. some) and that it is beyond the scope of the schedules to direct PDP policy in the manner requested by the submitter.</p> <p>Also see s42A Report.</p>	Reject.
OS11.23	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' v. earthworks is opposed.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for earthworks is appropriate.</p>	Reject.
OS11.24	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' xii. rural living be amended to recognise that the rural character of the scheduled area is not constant and will change into the future as	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for rural living is appropriate. I also note that the 21.23 Preamble explains that the schedules apply to a</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			demand for land and land intensification increases.	point in time and that values and capacity may change over time.	
OS11.27	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Ecological features and vegetation types' paragraph 8 references to significant vegetation are opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.13 was reviewed by an expert ecologist, with that expert supporting the notified text, including [8].	Reject.
OS11.28	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Ecological features and vegetation types' paragraphs 9a, b, and c be amended to include reference to the area being intensive productive farmland.	The pastoral use of this area is already acknowledged under 21.23.13[9](c). No further text changes are considered necessary in this regard.	Reject.
OS11.29	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Ecological features and vegetation types' paragraph 9c be amended to note that paradise shelduck is considered a disease carrying pest and dealt with accordingly by farmers in the area.	No technical evidence is provided in support of this submission point. The text of 21.23.13 was reviewed by an expert ecologist, with that expert supporting the notified text, including [9](c).	Reject.
OS11.30	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Ecological features and vegetation types' paragraph 10 references to 'rank exotic	No technical evidence is provided in support of this submission point. The text of 21.23.13 was reviewed by an expert ecologist, with that expert supporting the notified text, including [10]. It should be noted that the presence of rabbits and stoats in the area is	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			grassland providing habitat for skinks' is opposed and should be amended to reflect these areas are principally the habitat of rabbits and stoats (noxious introduced species).	acknowledged at the end of the schedule under 'Plant and Animal Pests'.	
OS11.31	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Shared and recognised attributes and values' paragraph 34 references to the popularity of State Highway 8A as a scenic vehicular and cycling route is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[34] is appropriate.	Reject.
OS11.32	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Shared and recognised attributes and values' paragraph 35 paragraph 35 references to the popularity of the Upper Clutha River, Newcastle, Eastern Hills and Grandview tracks nearby or within the area should be removed as they are not affected by activities on the scheduled land.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[35] is appropriate.	Reject.
OS11.33	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Naturalness attributes and values' paragraph 47	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			references to the perceptions of naturalness and spacious rural character being undermined by the presence of pivot irrigation infrastructure, driveways, gateways and signage is opposed.	workstream), I consider that the notified text in relation to 21.23.13[47] is appropriate.	
OS11.34	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Naturalness attributes and values' paragraph 48 reference to human intervention as intensively managed farmland being evident is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[48] is appropriate.	Reject.
OS11.35	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Memorability attributes and values' paragraph 49 be amended to note that the scheduled area is comparable to others in the Clutha and similar pivot irrigator views with mountain backdrops are common when driving from Tarras to Wanaka or Locharburn to Wanaka.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[49] is appropriate.	Reject.
OS11.36	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Transient attributes and values' paragraphs 50, 51,	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			and 52 should be amended to note that the scheduled area is comparable to others in the locality.	21.23.13[50] to [52] is appropriate. Any similarities to other parts of the Upper Clutha Basin is implicit in the descriptions applying across the schedules and does not need spelling out in each schedule.	
OS11.37	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Aesthetic attributes and values' paragraph 55 should be amended to note that these attributes reinforce the typical rural environment assessment of the schedule area from all viewpoints.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[55] is appropriate.	Reject.
OS11.38	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Aesthetic attributes and values' paragraph 56 should be amended to note that the backdrop of mountain views are enjoyed by all areas of the Upper Clutha basin and the schedule does little to improve or detract from that fact.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13[56] is appropriate.	Reject.
OS11.39	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' i. to xi are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.13 landscape capacity is appropriate.	Reject.
OS11.40	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway)	Refer response to OS11.19. The exact location of future public access opportunities is most appropriately determined	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			'Landscape Capacity' i. commercial recreation activities be amended so it is clear where the public access will be to and where it will be from.	as part of site-specific design as part of a proposal specific assessment.	
OS11.41	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' i. commercial recreation be amended to provide greater clarity around the requirement to integrate landscape restoration and enhancement.	Refer response to OS11.19.	Reject.
OS11.42	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' vi. farm building be amended to recognise that farm buildings and intensive farming are synonymous and that by definition these will form part of the landscape within the scheduled area.	Refer response to OS9.4.	Reject.
OS11.43	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' vii. mineral extraction be amended to recognise that this is part of an intensive farming area and expected in such a landscape.	Refer response to OS9.5.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS11.44	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' viii. transport infrastructure be amended to recognise that this is part of an intensive farming area and expected in such a landscape.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for transport infrastructure is appropriate.	Reject.
OS11.45	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' ix. utilities and regionally significant infrastructure be amended to recognise that this is part of an intensive farming area and expected in such a landscape.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for utilities and regionally significant infrastructure is appropriate.	Reject.
OS11.46	Peter Wing, Lagoon Valley Dairies Ltd	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' x. renewable energy generation be amended to recognise that this is part of an intensive farming area and expected in such a landscape.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for renewable energy generation is appropriate. It is noted that this activity is afforded the highest landscape capacity rating of 'some'.	Reject.
OS23.1	Tim Ensor, Fulton Hogan Limited	Support	That landscape schedule 21.23.13 (Kane Road) 'Land use patterns and features' inclusion of quarries near the intersection of McKay Road	Aligns with Council expert advice – no text change required.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			and the Luggate-Tarras Highway is supported.		
OS23.2	Tim Ensor, Fulton Hogan Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate-Tarras Highway) 'Landscape Capacity' vii. mineral extraction be amended as follows: "limited capacity for farm-scale quarries and Some capacity for expansion of existing quarries that maintain or enhance the quality of views, naturalness values and aesthetic values." or other similar wording.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for the expansion of existing quarries is appropriate. The potential landscape effects of quarry expansions in this specific landscape are such that a rating of 'limited' is considered reasonable.	Reject.
OS23.3	Tim Ensor, Fulton Hogan Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' vii. mineral extraction is opposed.	Refer response to OS23.2 and OS9.5.	Reject.
OS24.1	Alison Devlin, Willowridge Developments Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' iv. intensive agriculture be deleted so that there are no restrictions on agriculture, and no limitation in how much or what type of agriculture should take place within a recognised agricultural area.	Refer response to OS11.22.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS24.2	Alison Devlin, Willowridge Developments Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' v. earthworks be amended to delete the word "farming" so that earthworks associated with farming can occur unfettered.	Refer response to OS9.3.	Reject.
OS24.3	Alison Devlin, Willowridge Developments Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' vi. farm buildings be deleted so there are no impediments to the construction of required farm buildings.	Refer response to OS9.4.	Reject.
OS24.4	Alison Devlin, Willowridge Developments Limited	Support	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) 'Landscape Capacity' vii. mineral extraction be retained to support the expansion of the existing quarry on the Willowridge land.	Aligns with Council expert advice – no text change needed.	Accept.
OS24.5	Alison Devlin, Willowridge Developments Limited	Support	That the reference to the landscape being a 'working rural landscape' in landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) is supported.	Aligns with Council expert advice – no text change needed.	Accept.
OS24.6	Alison Devlin, Willowridge	Oppose	That landscape schedule 21.23.13 (Kane Road Luggate - Tarras Highway)	Refer response to OS11.22.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Developments Limited		'Landscape Capacity' iv. intensive agriculture is opposed.		
OS29.8	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) should have the capacity assessment revised to reflect the fact that the schedule is, in some situations, suitable for some urban expansion.	Refer response to OS11.21.	Reject.
OS29.9	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.23.13 (Kane Road and Luggate - Tarras Highway) should have the landscape capacity assessment for rural living, commercial recreation activities, visitor accommodation, and tourism-related activities revised.	Refer response to OS11.39.	Reject.

21.23.14 Hāwea Moraine

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS19.1	Dan Curley, PLDC Trustees Limited, Alison McRae Wright	Oppose	That landscape schedule 21.23.14 (Hāwea Moraine) 'Landscape Capacity' iii. urban expansions be amended from 'extremely limited' to 'limited' capacity, and the words 'in those areas that offer logical extension of existing urban environment' as follows: "Urban expansions - extremely limited or no landscape capacity, in those areas that offer logical extension of exiting urban development. "	No technical evidence is provided in support of this submission point. It was acknowledged by all of the landscape experts in expert conferencing for the PALS (Council) hearing, that the lowest capacity rating used in the schedules needed to signal that in certain circumstances there may be no landscape capacity for an activity. Urban expansion is typically one such activity, due to the significant landscape character transformation associated with this sort of development in a rural landscape context. However, as explained in the 21.23 Preamble, a site-specific landscape assessment as part of a plan change or resource consent application, may determine different landscape values and capacity to that identified in the schedule (which relates to the area as a whole). In my opinion this guidance along with the deliberate wording of 'extremely limited or no' landscape capacity, effectively leaves the door ajar for such development to be considered at some time in the future. For these reasons, I do not support the text changes requested by the submitter. Also see s42A Report.	Reject.
OS19.3	Dan Curley, PLDC Trustees Limited, Alison McRae Wright	Oppose	That landscape schedule 21.23.14 (Hāwea Moraine) 'Landscape Capacity' v.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			earthworks be amended to remove reference to farming.	workstream), I consider that the notified text in relation to 21.23.14'v. Earthworks' is appropriate. It is also noted that 21.23 Preamble explains that the schedules do not replace relevant PDP policies, rules or standards.	
OS19.4	Dan Curley, PLDC Trustees Limited, Alison McRae Wright	Oppose	That landscape schedule 21.23.14 (Hawea Moraine) 'Landscape Capacity' vi. farm buildings be amended to remove the words 'modestly scaled', as follows: " – some landscape capacity for modestly-scaled buildings that reinforce the existing rural character."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to qualifying comments for 21.23.14'vi Farm buildings' is appropriate, noting that this activity has been allocated the highest landscape capacity rating (i.e. 'some').	Reject.
OS19.5	Dan Curley, PLDC Trustees Limited, Alison McRae Wright	Oppose	That landscape schedule 21.23.14 (Hawea Moraine) 'Landscape Capacity' xii. rural living be amended from 'very limited' to 'limited' landscape capacity.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that a very limited landscape capacity rating for rural living is appropriate in this area.	Reject.
OS29.11	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.23.14 (Hawea Moraine) should have the capacity assessment revised to reflect the fact that the schedule is, in some situations, suitable for some urban expansion.	Refer response to OS19.1.	Reject.
OS29.12	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.23.14 (Hawea Moraine) should have their landscape capacity assessment for rural living, commercial recreation activities, visitor accommodation, and	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for rural living, commercial recreation activities, visitor accommodation and tourism related activities	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			tourism-related activities revised.	is appropriate. I also note that commercial recreation and visitor accommodation activities have been allocated with highest landscape capacity rating (i.e. 'some').	
OS38.2	Alex Durran	Oppose	That the "Very limited", "Extremely limited" and "Extremely limited or no" landscape capacity ratings for activities in landscape schedule 21.23.14 (Hāwea Moraine) are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream, and the PALS workstream, which included landscape expert conferencing on the capacity rating scale, I consider that the landscape capacity rating scale used in the schedules appropriate.	Reject.

21.23.15 Hāwea Basin

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS20.1	Dan Curley, John and Colleen Leith	Oppose	That landscape schedule 21.23.15 (Hāwea Basin) mapping be amended to follow the outside edge of the physically built environment, which includes buildings and occupation directly adjacent the Rural Lifestyle zone (but within the Rural Zone) rather than following zoning which does not define a landscape unit in actuality as experienced.	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). There is nothing, from a landscape perspective, that differentiates these areas from the broader s7(c) setting.	Reject.
OS20.4	Dan Curley, John and Colleen Leith	Oppose	That landscape schedule 21.23.15 (Haweia Basin) 'Landscape Capacity' vi. farm buildings be amended to remove descriptive words such as modestly scaled.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for farm buildings is appropriate.	Reject.
OS20.5	Dan Curley, John and Colleen Leith	Oppose	That landscape schedule 21.23.15 (Haweia Basin) 'Landscape Capacity' vii. mineral extraction be amended as follows:	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			" limited some capacity...".	workstream), I consider that the notified text in relation to the landscape capacity for mineral extraction is appropriate.	
OS20.6	Dan Curley, John and Colleen Leith	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' xi. rural living be amended as follows: "very limited landscape capacity...".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for rural living is appropriate.	Reject.
OS20.7	Dan Curley, John and Colleen Leith	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' xi. rural living be amended to remove descriptive words such as 'modest scale' and 'low key'.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the qualifying comments for rural living development is appropriate. I note that this approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders). Also see BG EIC discussion of this matter.	Reject.
OS21.3	Dan Curely, Jolly Holdings Ltd	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' xi. rural living be amended as follows: "very limited some landscape capacity...".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for rural living is appropriate.	Reject.
OS21.4	Dan Curely, Jolly Holdings Ltd	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' xi. rural living be amended to remove descriptive words	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			such as modest scale or low key.	qualifying comments for rural living development is appropriate.	
OS21.5	Dan Curely, Jolly Holdings Ltd	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' vi. farm buildings be amended to remove descriptive words such as modestly scaled.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the qualifying comments for farm buildings is appropriate. I note that this approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders). Also see BG EIC discussion of this matter.	Reject.
OS21.6	Dan Curely, Jolly Holdings Ltd	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' vii. mineral extraction be amended as follows: "limited some capacity...".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for mineral extraction is appropriate.	Reject.
OS29.14	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) should have the capacity assessment revised to reflect the fact that the schedule is, in some situations, suitable for some urban expansion.	Schedule 21.23.15 signals that there is some landscape capacity as identified in the QLDC 2021 Spatial Plan, so no change to the text is considered necessary.	Accept.
OS29.16	Rosie Hill, Devon Dairy Farms Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) should have the capacity assessment for rural living, commercial recreation activities, visitor accommodation, and	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity for rural living, commercial recreation activities, visitor accommodation and tourism related activities is appropriate. I also note that commercial recreation and	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			tourism-related activities revised.	visitor accommodation activities have been allocated with highest landscape capacity rating (i.e. some).	
OS35.2	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That if the maps are not deleted from the Variation, that landscape schedule 21.23.15 (Hawea Basin) be amended to exclude the Laing Dairy Limited land (as described in paragraph 4 of the submission).	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15 is appropriate (subject to any refinement recommended in response to submissions).	Reject.
OS35.3	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That the landscape classification of the Exchange Land (as described in paragraph 5(a) of the submission), and its analysis which notes 'there is nothing from a landscape perspective that differentiates this land from a broader s7(c) setting which would justify exclusion from the schedule area' is opposed.	No technical evidence is provided in support of this submission point. The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), there is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting. It should also be noted that the proposed amendments to the 21.23.25 (and Preamble) text to clarify that the schedule applies to the Rural Zone land in the area may go some way to addressing the concerns raised by the submitter in this regard as the Exchange Land is Informal Recreation Zone rather than Rural Zone.	Accept in part.
OS35.4	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Ecological features and vegetation types' paragraph 12 reference to the presence of birds is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.15 was reviewed by an expert ecologist, with that expert supporting the notified text.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS35.5	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Ecological features and vegetation types' paragraph 13 reference to skinks is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.15 was reviewed by an expert ecologist, with that expert supporting the notified text, including reference to skinks.	Reject.
OS35.6	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Land use patterns and features' paragraph 14 description of farming be corrected to note that there is only one dairy farm on the Hawea Flat and the rest is either cropping or generally cattle and sheep grazing.	Text amendments made to s42A Version 21.23.15[14].	Accept.
OS35.7	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Land use patterns and features' paragraph 17 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.21.15[17] is appropriate.	Reject.
OS35.8	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) paragraph 47 that states "the Hawea Domain which is particularly popular for casual recreation (walking, dog exercising), ... large events (Hawea Picnic Race Day and Cavalcade..." is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.21.15[47] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS35.9	Maree Baker-Galloway, Laing Dairy Limited	Not Stated	That landscape schedule 21.23.15 (Hawea Basin) 'Historic attributes and values' paragraph 40 be amended to acknowledge that in the last 20 years farming has changed to more cattle grazing.	No technical evidence is provided in support of this submission point. The text of 21.23.15 was reviewed by a heritage expert, with that expert supporting the notified text of the 'Historic attributes and values' section of the schedule. Further, the cattle grazing associated with the area is acknowledged in other parts of the schedule.	Reject.
OS35.10	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Particularly important views to and from the area' paragraph 53 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[53] is appropriate.	Reject.
OS35.11	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Particularly important views to and from the area' paragraph 54 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[54] is appropriate.	Reject.
OS35.12	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Naturalness attributes and values' paragraph 58 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[58] is appropriate.	Reject.
OS35.13	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Naturalness attributes and values' paragraph 59 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[59] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS35.14	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hāwea Basin) 'Memorability attributes and values' paragraph 62 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[62] is appropriate.	Reject.
OS35.15	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hāwea Basin) 'Shared and recognised attributes and values' paragraph 42 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[42] is appropriate.	Reject.
OS35.16	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hāwea Basin) 'Shared and recognised attributes and values' paragraph 43 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[43] is appropriate.	Reject.
OS35.17	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hāwea Basin) 'Particularly important views to and from the area' paragraph 52 is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.15[52] is appropriate.	Reject.
OS35.18	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hāwea Basin) 'Landscape Capacity' ratings be amended to not read as policy direction with statements as to what mitigation is appropriate for activities, or what outcomes should be aimed for, with	The 21.23 Preamble explains that the schedules do not override PDP policies, standards or rules. The qualifying comments in the landscape capacity section of the schedules is intended to assist plan users and was supported by the landscape and planning experts in the PALS Council hearing process.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			any policy-type statements deleted.		
OS35.19	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' ii. visitor accommodation and tourism related activities "very limited landscape capacity" for tourism related activities is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity (and qualifying comments) for visitor accommodation and tourism related activities is appropriate.	Reject.
OS35.20	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' vii. mineral extraction rating of "limited landscape capacity" is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity (and qualifying comments) for mineral extraction activities is appropriate.	Reject.
OS35.21	Maree Baker-Galloway, Laing Dairy Limited	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' xi. rural living rating of "very limited landscape capacity" is opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity (and qualifying comments) for rural living activities is appropriate.	Reject.
OS42.1	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Historic attributes and values' paragraph 40 and 41 be amended to better reflect the role that high country farming has had on the landscape attributes and values in the Upper Clutha.	No technical evidence is provided in support of this submission point. The text of 21.23.15 was reviewed by a heritage expert, with that expert supporting the notified text of the 'Historic attributes and values' section of the schedule.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS42.2	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Particularly important views to and from the area' paragraph 52 to 57 be amended to include recognition of the presence of pastoral and cropping activities, the presence and need for shelter belt planting.	These various existing landscape elements are already referenced in 21.23.15[52], and no further changes are considered necessary.	Reject.
OS42.3	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Particularly important views to and from the area' paragraph 52 to 57 be amended to recognise pivot irrigation as a legitimate part of modern farming practices instead of an 'industrial' rural landscape impression.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the 21.23.15[52] is appropriate.	Reject.
OS42.4	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Naturalness attributes and values' paragraph 58 be amended to remove the biased view against pivot irrigation infrastructure and other built elements necessary to sustain legitimate farming activities that have influenced land use patterns over generations.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the 21.23.15[58] is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS42.5	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Summary of landscape values' paragraph 73 to 75 be amended to include a more fine-grained description of the landscape values of the Hawea Basin that better recognises the presence and role of pastoral farming in some parts of this area.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the 21.23.15[73] to [75] is accurate and appropriate.</p> <p>I note that the approach adopted in the summary of landscape values in the UCLS has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders).</p>	Reject.
OS42.6	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' is opposed.	For reasons of methodological consistency with the 21.23 PALS, it is considered appropriate to include references to landscape capacity in the schedule.	Reject.
OS42.7	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' xi. rural living be amended to provide a higher landscape capacity for farming infrastructure, including housing accommodation for farm employees and diversification of these operations to support changing market demands and ensure greater future sustainability.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for rural living is appropriate. It should be noted that the P21.23 Preamble explains that the schedules do not override any of the PDP policies, rural or standards.</p> <p>Also see s42A Report.</p>	Reject.
OS42.8	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' iv. intensive agriculture be amended from some capacity to provide a higher landscape capacity for	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for intensive</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			farming infrastructure and buildings, to support farming operations, including diversification of these operations to support changing market demands and ensure greater future sustainability.	<p>agriculture is appropriate. It should be noted that the 21.23 Preamble explains that the schedules do not override any of the PDP policies, rules or standards.</p> <p>Also see s42A Report.</p>	
OS42.9	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' v. earthworks be amended from some to provide a greater landscape capacity for earthworks to support farming operations, including diversification of these operations to support changing market demands and ensure greater future sustainability.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for earthworks is appropriate. It should be noted that the 21.23 Preamble explains that the schedules do not override any of the PDP policies, rules or standards.</p> <p>Also see s42A Report.</p>	Reject.
OS42.10	Simone Creedy, Ross Family Trust	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Landscape Capacity' vi. farm buildings some capacity be amended to provide a higher landscape capacity for farming buildings to support farming operations, including diversification of operations to meet changing market demand and alteration of practices to ensure greater future sustainability.	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for farm buildings is appropriate. It should be noted that the 21.23 Preamble explains that the schedules do not override any of the PDP policies, rural or standards.</p> <p>Also see s42A Report.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS42.12	Simone Creedy, Ross Family Trust	Support	That landscape schedule 21.23.15 (Hawea Basin) 'Particularly important views to and from the area' paragraphs 52 to 57 are generally retained as notified, subject to the relief sought in the submission.	Refer response to OS42.3.	Reject.
OS44.2	Ian Hadland	Support	That landscape schedule 21.23.15 (Hawea Basin) be amended to include reference to the sports fish habitat provided by the Hawea River within either the 'Hydrological' or 'Ecological features' section.	Text amendment made to s42A Version 21.23.15[12].	Accept.
OS44.5	Ian Hadland	Support	That landscape schedule 21.23.15 (Hawea Basin) 'Recreational attributes and values' be amended to include reference to the recreational angling on the Hawea River.	Text amendment made to s42A Version 21.23.15[49A].	Accept.
OS44.6	Ian Hadland	Oppose	That landscape schedule 21.23.15 (Hawea Basin) 'Summary of Landscape Values' be amended to increase the physical values from 'moderate high' to 'high'.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the rating of physical values is appropriate.	Reject.
OS44.7	Ian Hadland	Support	That landscape schedule 21.23.15 (Hawea Basin) 'Summary of Landscape Values' be amended to increase the associative	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			values from 'moderate high' to 'high'.	workstream), I consider that the notified text in relation to the rating of associative values is appropriate.	
OS55.1	Dan Curley, Bluesure Developments Ltd	Support	That the mapping for landscape schedule 21.23.15 (Hawea Basin) is supported, particularly with regard to the identification of the land north of the Hawea Golf Course (adjacent to the State Highway) as a sub-unit of the schedule.	There is no subunit identified within the mapped extent of the area to which 21.23.15 applies.	Reject.
OS55.2	Dan Curley, Bluesure Developments Ltd	Oppose	That landscape schedule 21.23.15 (Hawea Basin) descriptions of features, values and character are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the features, values and character are appropriate.	Reject.
OS55.3	Dan Curley, Bluesure Developments Ltd	Support	That landscape schedule 21.23.15 (Hawea Basin) be approved subject to amendments.	Amendments have been made to 21.23.15 in response to submissions, to reflect landowner knowledge, correct errors, align with the PALS approach etc, where they are supported by expert planning, landscape or 'other expert input' advice.	Reject.

21.23.16 Crosshill

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS5.1	Rod Macleod	Support	That the 'moderate' classification is reviewed in Schedule 21.23.16 (Crosshill) with the intention of better protecting existing characteristics and land use.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and PALS workstream), I consider that the moderate ratings for landscape values in the notified text are appropriate.	Reject.
OS5.2	Rod Macleod	Support	That landscape schedule 21.23.16 (Crosshill) is supported as notified.	Aligns with Council expert recommendations – no change required.	Accept.
OS5.3	Rod Macleod	Support	That the descriptions of landforms, ecological features and land use features in paragraphs 1,2,7 and 10 of landscape schedule 21.23.16 (Crosshill) are supported.	Aligns with Council expert recommendations – no change required.	Accept.
OS5.4	Rod Macleod	Support	That the description of important views set out in paragraph 27 'Particularly important views to and from the area' of landscape schedule 21.23.16 (Crosshill) is supported.	Aligns with Council expert recommendations – no change required.	Accept.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS5.5	Rod Macleod	Support	That the identification of low density pastoral farming and the associated seasonal changes in paragraphs 33 and 35, and the identified aesthetic appeal in paragraph 39 of landscape schedule 21.23.16 (Crosshill) are supported.	Aligns with Council expert recommendations – no change required.	Accept.
OS5.7	Rod Macleod	Support	That landscape schedule 21.23.16 (Crosshill) 'Landscape Capacity' clauses i. to xii. identify are supported.	Aligns with Council expert recommendations – no change required.	Accept.
OS15.4	Simon Peirce, Aurora Energy Limited	Oppose	That landscape schedule 21.23.16 (Crosshill) be amended to recognise the electricity sub-transmission infrastructure and significant electricity distribution infrastructure owned by Aurora Energy.	Text amendment made to s42A Version of 21.23.16[10].	Accept.
OS25.3	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' i. commercial recreation activities be amended as follows: "i. Commercial recreation activities - very limited some landscape capacity for small scale and low key activities that integrate with and complement/enhance existing recreation features;	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for commercial recreation is appropriate. This is in part due to the very broad range of activities that this activity covers under the PDP Chapter 2 definition (see 21.23 Preamble). Also refer to S42A Report.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>are located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). <u>that maintains or enhances the rural landscape character and visual amenity values while providing economic opportunities for diversification. This could also be the economic driver for providing increased access and environmental enhancement.</u>"</p>		
OS25.5	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' ii. visitor accommodation and tourism related activities be amended as follows:</p> <p>"ii. Visitor accommodation and tourism related activities - limited some landscape capacity for activities that are located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be of a small scale and 'low-key' rural</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for rural living is appropriate.</p> <p>Also refer to S42A Report.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). Extremely limited landscape capacity for tourism related activities that are: visually recessive; designed to be small scale and have a low key 'rural' character; and integrate landscape restoration that maintains or enhances the rural landscape character and visual amenity values while providing economic opportunities for diversification. This could also be the economic driver for providing increased access and environmental enhancement. For example, on farm vineyard related tourism."</p>		
OS25.7	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' iii urban expansions be amended from "extremely limited to no landscape capacity" to "extremely limited but not no landscape capacity".</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to the landscape capacity rating for urban expansion is appropriate.</p> <p>The rating terminology (and meanings) were an issue that was extensively traversed in the expert conferencing for the PALS workstream, where the experts agreed that for many instances in rural environments, urban development <u>may</u> not be appropriate and it is therefore appropriate to signal that this <u>may</u> be the case in the lowest landscape capacity rating. The</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
				use of the word 'or' in the rating, effectively leaves the door ajar for a degree of capacity to be identified as part of a proposal specific assessment.	
OS25.9	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' iv. intensive agriculture be amended as follows: iv. Intensive agriculture - some landscape capacity where the quality of views and aesthetic attributes and values <u>soils and available water allocation support the activity, and where expressiveness and aesthetic attributes and values</u> are maintained or enhanced."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to the landscape capacity rating and qualifying comments for intensive agriculture is appropriate. While the sort of wording suggested by the submitter was originally used in the PALS, this was removed as it conflates landscape matters with other non-landscape matters that are addressed by other experts (soils) or via the Regional Council (water allocation). Also see s42A Report. I note that this approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders).	Reject.
OS25.11	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' v. earthworks be amended as follows: "v. Earthworks - limited some landscape capacity to absorb earthworks associated with trails, farming and rural living/visitor accommodation activities/ tourism related activities that maintain naturalness and expressiveness attributes	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for earthworks is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			and values and integrate with existing natural landform patterns.”		
OS25.13	Phill Hunt, Fork Farm Family Trust	Support	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' vi. farm buildings is retained as notified.	Aligns with Council expert recommendations – no change required.	Accept.
OS25.15	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' vii. mineral extraction be amended as follows: “vii. Mineral extraction - very limited landscape capacity for farm-scale quarries that maintain or enhance the quality of views, naturalness values and aesthetic values. <u>PA's landscape character and visual amenity values.</u> ”	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for mineral extraction is appropriate.	Reject.
OS25.17	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' viii. transport infrastructure be amended as follows: “viii. Transport infrastructure - very limited some landscape capacity to absorb additional infrastructure that is of a modest scale and low-key rural character. <u>Our community also requires</u>	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for transport infrastructure is appropriate. Also see s42A Report.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>road upgrades and modern transport infrastructure when appropriate. For example, a upgrade of Dublin Bay Road and bus stops when public transport arrives in the Upper Clutha.”</p>		
OS25.19	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' ix utilities and regionally significant infrastructure be as follows:</p> <p>"ix. Utilities and regionally significant infrastructure - limited some landscape capacity for additional district scale infrastructure that is buried or located such that they are screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened, these should be designed and located so that they are not visually prominent. In the case of the National Grid, limited landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks. Very limited capacity for other</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for utilities and regionally significant infrastructure is appropriate.</p> <p>Also see s42A Report.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			larger-scale regionally significant infrastructure. <u>As the copper network for communication is being neglected in rural areas and with no access to fibre there will be a need for more infrastructure sites to provide communication opportunities.</u> "		
OS25.21	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' x. renewable energy generation is amended as follows: "x. Renewable energy generation - some landscape capacity for <u>discreetly located and</u> small-scale renewable energy generation. Very limited Some landscape capacity for larger scale commercial renewable energy generation <u>placed strategically with respect to the landscape. To reduce our reliance on fossil fuels for electricity generation more locally positioned carbon neutral generation schemes will be required in the future.</u> "	The submitter appears to have misread the notified text in this regard: Renewable energy generation – some landscape capacity for small-scale wind or solar generation located where topography or mature vegetation ensures it is not highly visible from public places. Very limited landscape capacity for larger-scale commercial renewable energy generation where topography or mature vegetation ensures it is not highly visible from public places. No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for renewable energy generation is appropriate. Also see s42A Report.	Reject.
OS25.23	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' xi.	The submitter appears to have misread the notified text in this regard:	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>forestry be amended as follows:</p> <p>"xi. Production forestry - Extremely limited to no landscape capacity for small scattered <u>wilding</u> woodlots of up to 2 hectares in area. <u>Positioning of these must consider the risk of wilding trees. Some landscape capacity for scattered small non-wilding woodlots of up to 2 hectares in area. Planting of native woodlots and reforestation should be actively encouraged by council.</u>"</p>	<p>Forestry – limited landscape capacity for scattered woodlots of up to 2 hectares in area.</p> <p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for forestry is appropriate as it reflects current land uses. It is my understanding that the PDP actively discourages the use of wilding species in the District in Chapter 34 of the PDP</p> <p>Also see s42A Report.</p>	
OS25.25	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.16 (Crosshill) 'Landscape capacity' xii. rural living be amended from very limited to some landscape capacity as follows:</p> <p>"<u>very limited some</u> landscape capacity to absorb additional rural living without cumulative adverse effects on naturalness, aesthetic, remoteness and rural character values. Any additional rural living should be set well back from roads; integrated by landform and/or existing vegetation; designed to be of a modest scale; have a 'low-key' rural</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for rural living is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			character; integrate landscape restoration and enhancement (where appropriate); and should maintain public views across land to surrounding landforms.”		
OS37.1	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) be amended to remove the submitters land (Lots 1-3 DP26282, Lot 3 DP27742, Lot 1 426178, Lot 1 DP22678 & Section 45 Block V Lower Wanaka SD), or amended to recognise and provide for anticipated development within the property appropriately.	<p>The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). There is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting.</p> <p>21.23.16 has been amended in response to submissions, to reflect landowner knowledge, correct errors, align with the PALS approach etc, where supported by expert planning, landscape and 'other expert input' advice.</p>	Accept in part.
OS37.4	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Ecological features and vegetation types' point 9. be deleted to remove reference to rank exotic grassland along road margins may be utilised by skinks.	<p>No technical evidence is provided in support of this submission point.</p> <p>The text of 21.23.16 was reviewed by an expert ecologist, with that expert supporting the notified text, including reference to skinks.</p>	Reject.
OS37.5	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 Crosshill 'particularly important views to and from the area' paragraph 27 be amended to delete the following: "The distinctly planar, open, and working rural character of the terraces, in	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.16[27] is appropriate.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			combination with the pastoral and generally open character of the moraine, contributes the impression of a continuous patterning of rural land use across the area and reinforces the coherence of the underlying river terrace and moraine landforms. This is the first open 'rural' view after leaving Albert Town which, in combination with the strong contrast in visual appearance between the area and the proximate Albert Town/Wanaka context, adds to the memorability of the view."		
OS37.6	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Particularly important views to and from the area' paragraph 30 be deleted to remove the following: "Attractive short-range rural views from parts of the Deans Bank Track across the lower river terrace. In these views there is an appealing contrast between the tamed rural terraces and the rougher character associated with the river corridor (outside the area)".	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.16[30] is appropriate.	Reject.
OS37.7	Duncan White, Sunnyheights	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Particularly important views	Text amendment made to s42A Version of 21.23.16[31].	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Limited RH and PH Masfen		to and from the area' paragraph 31 be amended to add the following text: "Views from the summit of Mount Iron (ONF), where the panoramic vistas take in the river terraces and the undulating pastoral moraine land extending to along the north-eastern side of the area, <u>within a viewing context of much of the Wanaka and surrounding areas including urban and built environments.</u> "		
OS37.8	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Memorability attributes and values' paragraph 34 be deleted to remove the following: "Memorable to residents and locals as part of the 'rural hinterland' between Albert Town and Hawea settlement."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PA Schedules workstream), I consider that the notified text in relation to 21.23.16 [34] is appropriate.	Reject.
OS37.9	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Aesthetic attributes and values' paragraph 38 be amended as follows: "The experience of all of the values identified above from public and private viewpoints."	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.16[38] is appropriate. The reference to private viewpoints acknowledges the important role that the area plays in shaping the visual amenity values of the nearby urban area.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS37.10	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Summary of Landscape Values' paragraph 41 be amended as follows: "Moderate associative values relating to the mana whenua associations of the area, the recreational use of the track along Mata-au (Clutha River), and the shared and recognised values of the area for residents and locals as part of the 'rural hinterland' between Albert Town and Hawea settlement. "	No technical evidence is provided in support of this submission point. The text of 21.23.16 was reviewed by a tourism expert with that expert supporting the notified text. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.16[41] is appropriate	Reject.
OS37.11	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape Capacity' i. commercial recreational activities be amended as follows: "very limited some landscape capacity for small-scale and low-key activities that: integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be of a small-scale and 'low-key' rural character; integrate landscape restoration and enhancement (where	Refer response to OS25.3.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			appropriate); and enhance public access (where appropriate)."		
OS37.12	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape Capacity' ii. visitor accommodation and tourism related activities be amended as follows: " limited some landscape capacity for activities that are located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be of a small scale and 'low key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). Extremely limited some landscape capacity for tourism related activities that are: visually recessive; designed to be small scale and have a low key 'rural' character; and integrate landscape restoration."	Refer response to OS25.5.	Reject.
OS37.13	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape Capacity' iii. urban expansions be amended as follows:	Refer response to OS25.7.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"extremely limited or no landscape capacity."		
OS37.14	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That landscape schedule 21.23.16 (Crosshill) 'Landscape Capacity' xii. rural living be amended as follows: "very limited some 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 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of rural views from public vantage points."	Refer response to OS25.5.	Reject.
OS37.18	Duncan White, Sunnyheights	Oppose	That landscape schedule 21.23.16 (Crosshill) be amended to more accurately recognise and provide for	Amendments have been made to 21.23.16 in response to submissions, to reflect landowner knowledge, correct errors,	Accept in part.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
	Limited RH and PH Masfen		existing uses, and varying degrees of character, value and attributes across the entire schedule.	align with the PALS approach etc where supported by expert landscape, planning or 'other expert input' advice.	
OS37.19	Duncan White, Sunnyheights Limited RH and PH Masfen	Oppose	That revised capacity ratings are required if the terminology and definitions are retained within Schedule 21.23.16 (Crosshill) as well as a corresponding scale of development to guide the implementation of this	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to 21.23.16 landscape capacity ratings is appropriate.	Reject.

21.23.17 Quartz Creek and Maungawera

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Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS10.12	Michael Bathgate, Kai Tahu ki Otago	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Mana whenua associations and experience' paragraph 23 contains a redundant comma which should be deleted.	Text corrections made to s42A Version of 21.23.17[23].	Accept.
OS18.1	Dan Curley, Graham Pender	Neutral	That a specific capacity rating of "limited" rather than "very limited" be included for the eastern extent of the scheduled area for landscape schedule 21.23.17 (Quartz Creek and Maungawera).	No technical evidence is provided in support of this submission point. Further, the submitter does not clarify which activities it is seeking a change in the landscape capacity from very limited to limited for the eastern extent of the area. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for the area is appropriate.	Reject.
OS25.4	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' i. commercial recreation activities be amended as follows: "i. Commercial recreation activities - very limited	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for commercial recreation is appropriate. This is in part due to the very broad	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>some landscape capacity for small-scale and low-key activities that are located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate) <u>that maintains or enhances the rural landscape character and visual amenity values while providing economic opportunities for diversification. This could also be the economic driver for providing increased access and environmental enhancement."</u></p>	<p>range of activities that this activity covers under the PDP Chapter 2 definition (see 21.23 Preamble). Also refer to S42A Report.</p>	
OS25.6	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' ii. visitor accommodation and tourism related activities be amended to some landscape capacity as follows: "ii. Visitor accommodation and tourism related activities - limited <u>some</u> landscape capacity for activities that are co-located</p>	<p>No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity and qualifying comments for rural living is appropriate. Also refer to S42A Report.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>with existing development; located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be of a small scale and 'low key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). Extremely limited or no landscape capacity for tourism related activities that are visually recessive; designed to be small scale and have a low key 'rural' character; and integrate landscape restoration that maintains or enhances the rural landscape character and visual amenity values while providing economic opportunities for diversification. This could also be the economic driver for providing increased access and environmental enhancement. For example, on farm vineyard related tourism."</p>		
OS25.8	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' iii. urban expansions be amended from "extremely limited or no	<p>No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			landscape capacity" to "extremely limited but not no landscape capacity".	workstream, I consider that the notified text in relation to the landscape capacity rating for urban expansion is appropriate. The rating terminology (and meanings) were an issue that was extensively traversed in the expert conferencing for the PALS workstream, where the experts agreed that for many instances in rural environments, urban development <u>may</u> not be appropriate and it is therefore appropriate to signal that this <u>may</u> be the case in the lowest landscape capacity rating. The use of the word 'or' in the rating, effectively leaves the door ajar for a degree of capacity to be identified as part of a proposal specific assessment.	
OS25.10	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' iv. intensive agriculture be amended as follows: iv. Intensive agriculture - some landscape capacity where the quality of views and aesthetic attributes and values <u>soils and available water allocation support the activity, and where expressiveness and aesthetic attributes and values are maintained or enhanced.</u> "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream and the PALS workstream, I consider that the notified text in relation to the landscape capacity rating and qualifying comments for intensive agriculture is appropriate. While the sort of wording suggested by the submitter was originally used in the PALS, this was removed as it conflates landscape matters with other non-landscape matters that are addressed by other experts (soils) or via the Regional Council (water allocation). Also refer to S42A Report. I note that this approach has been carried through to the existing PALS (confirmed by Environment Court Consent Determination and Orders).	Reject.
OS25.12	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' v. earthworks be amended as follows:	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			"v. Earthworks - limited some landscape capacity to absorb earthworks associated with trails, farming and rural living/visitor accommodation activities/tourism related activities that maintain naturalness and expressiveness values and integrate with existing natural landform patterns."	landscape capacity rating and qualifying comments for earthworks is appropriate.	
OS25.14	Phill Hunt, Fork Farm Family Trust	Support	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' vi farm buildings is retained as notified.	Aligns with Council expert recommendations – no change required.	Accept.
OS25.16	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity vii. mineral extraction be amended as follows: "vii. Mineral extraction - very limited landscape capacity for farm-scale quarries that maintain or enhance the quality of views, naturalness values and aesthetic values. <u>PA's landscape character and visual amenity values.</u> "	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for mineral extraction is appropriate.	Reject.
OS25.18	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' viii. transport	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>infrastructure be amended as follows:</p> <p>“viii. Transport infrastructure - very limited some landscape capacity to absorb additional infrastructure that is of a modest scale and low-key rural character. <u>Our community also requires road upgrades and modern transport infrastructure when appropriate. For example, a upgrade of Dublin Bay Road and bus stops when public transport arrives in the Upper Clutha.</u>”</p>	<p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for transport infrastructure is appropriate.</p> <p>Also refer to S42A Report.</p>	
OS25.20	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' ix. utilities and regionally significant infrastructure be amended from limited to some landscape capacity as follows:</p> <p>“ix. Utilities and regionally significant infrastructure - limited some landscape capacity for additional district scale infrastructure, that is buried or located such that they are screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened,</p>	<p>No technical evidence is provided in support of this submission point.</p> <p>Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for utilities and regionally significant infrastructure is appropriate.</p> <p>Also refer to S42A Report.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>these should be designed and located so that they are not visually prominent. In the case of the National Grid, limited landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks. Very limited capacity for other larger-scale regionally significant infrastructure. <u>As the copper network for communication is being neglected in rural areas and with no access to fibre there will be a need for more infrastructure sites to provide communication opportunities.</u>"</p>		
OS25.22	Phill Hunt, Fork Farm Family Trust	Oppose	<p>That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape capacity' x. renewable energy generation is amended as follows: "x. renewable energy generation - some landscape capacity for discreetly located and small-scale renewable energy generation. Limited Some landscape capacity for larger scale commercial renewable</p>	<p>The submitter appears to have misread the notified text in this regard:</p> <p>Renewable energy generation – some landscape capacity for small-scale wind or solar generation located where topography or mature vegetation ensures it is not highly visible from public places. Limited landscape capacity for larger-scale commercial renewable energy generation.</p> <p>No technical evidence is provided in support of this submission point.</p>	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			energy generation <u>placed strategically with respect to the landscape. To reduce our reliance on fossil fuels for electricity generation more locally positioned carbon neutral generation schemes will be required in the future.</u> "	Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for renewable energy generation is appropriate. Also refer to S42A Report.	
OS25.24	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape Capacity' xi. forestry be amended as follows: "xi. Production forestry - Extremely limited to no Limited -landscape capacity for scattered small <u>wilding woodlots of up to 3 hectares in area. Positioning of these must consider the risk of wilding trees. Some landscape capacity for scattered small non-wilding woodlots of up to 2 hectares in area. Planting of native woodlots and reforestation should be actively encouraged by council.</u> "	The submitter appears to have misread the notified text in this regard: Forestry – limited landscape capacity for scattered woodlots of up to 2 hectares in area. No technical evidence is provided in support of this submission point. Relying on my landscape evaluation as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for forestry is appropriate as it reflects current land uses. It is my understanding that the PDP actively discourages the use of wilding species in the District in Chapter 34 of the PDP Also refer to S42A Report.	Reject.
OS25.26	Phill Hunt, Fork Farm Family Trust	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Landscape Capacity' xii. rural living be amended as follows: "xii. Rural living - very limited some landscape	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity rating and qualifying comments for rural living is appropriate.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			<p>capacity to absorb additional rural living without cumulative adverse effects on associative and perceptual values. <u>on naturalness, aesthetic, remoteness and rural character</u> The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development. In a similar vein, development across the northern side of the valley near the adjacent ONL runs the risk of detracting from the naturalness and aesthetic values of the neighbouring ONL. Any additional rural living should be set well back from ONL edges, roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a modest scale; have a 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain public views across open land to surrounding landforms."</p>		

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
OS27.2	Tim Burdon	Oppose	That the "very limited", "extremely limited" and "extremely limited or no" landscape capacity ratings for various activities in landscape schedule 21.23.17 (Quartz Creek and Maungawera) are opposed.	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS workstream), I consider that the notified text in relation to the landscape capacity ratings are appropriate.	Reject.
OS27.5	Tim Burdon	Oppose	That the reference to irrigation ponds in paragraph 7 of landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Hydrological features' is opposed as it is incorrect.	Text amendments made to s42A Version of 21.23.17[7].	Accept.
OS27.6	Tim Burdon	Oppose	That the following statement in paragraph 8a in landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Ecological features and vegetation types' is opposed: "Swathes and patches of regenerating kanuka and bracken across toe slopes of Mt Maude and along margins of Quartz Creek and Rods Creek and across the portion of the Maungawera fan near Quartz Creek."	No technical evidence is provided in support of this submission point. The text of 21.23.17 was reviewed by an expert ecologist, with that expert supporting the notified text.	Reject.
OS27.7	Tim Burdon	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Ecological features and vegetation types' be amended at paragraph 9d to remove	No technical evidence is provided in support of this submission point. The text of 21.23.17 was reviewed by an expert ecologist, with that expert supporting the notified text. The submitter is encouraged to provide evidence on this matter for review by the Council team.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			reference to wilding conifers as it is incorrect.		
OS27.8	Tim Burdon	Oppose	That the reference to improved pasture and cropping areas providing seasonal feeding grounds for paradise duck, oyster catcher, seagull and plover in paragraph 10 of landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Ecological features and vegetation types' is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.17 was reviewed by an expert ecologist, with that expert supporting the notified text.	Reject.
OS27.9	Tim Burdon	Oppose	That the reference in landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Ecological features and vegetation types' in paragraph 11 'rank exotic grassland and bracken along road margins and stream margins may be utilised by skinks' is opposed.	No technical evidence is provided in support of this submission point. The text of 21.23.17 was reviewed by an expert ecologist, with that expert supporting the notified text.	Reject.
OS27.10	Tim Burdon	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Land use patterns and features' paragraph 14 should be amended as it is outside of the mapped area on neighbouring land.	Text amendments made to s42A Version of 21.23.17[14].	Accept.
OS27.11	Tim Burdon	Oppose	That paragraph 17 of landscape schedule 21.23.17 (Quartz Creek and	No technical evidence is provided in support of this submission point.	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			Maungawera) should be amended as it is not specific and the known Maori occupation is in Dublin Bay which is outside the mapped area.	The text of 21.23.17 was reviewed by Aukaha and a heritage expert, with both Aukaha and the heritage expert supporting the notified text.	
OS27.12	Tim Burdon	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Shared and recognised attributes and values' be amended at paragraph 27 to remove any suggestion that there is public access to the lake.	It is considered that the wording of 21.23.17[27] appropriately acknowledges that the current informal access is via private land (and is therefore not public access in the normal sense of the term). It should also be noted that this informal access is deliberately not mentioned as a recreational value due to its nature of being on private land.	Reject.
OS27.13	Tim Burdon	Oppose	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) be updated to reflect the Mt Burke Station upgraded irrigation development undertaken in 2020/2021.	Text amendments made to s42A Version of 21.23.17[12].	Accept.
OS44.3	Ian Hadland	Support	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) be amended to include reference to the sport fish spawning habitat provided by Quartz Creek within either the 'Hydrological' or 'Ecological features' section.	Text amendments made to s42A Version of 21.23.17[10].	Accept.
OS44.8	Ian Hadland	Support	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Summary of Landscape Values' be amended to increase the	No technical evidence is provided in support of this submission point. Relying on my landscape evaluation (including field work) as part of the Upper Clutha Schedules workstream (and the PALS	Reject.

Original Submission No	Submitter	Position	Summary	BG Comments	BG Recommendation
			physical values from 'moderate high' to 'high'.	workstream), I consider that the notified text in relation to the rating of Physical landscape values is appropriate.	
OS44.9	Ian Hadland	Support	That landscape schedule 21.23.17 (Quartz Creek and Maungawera) 'Summary of Landscape Values' be amended to reflect the significance of Quartz Creek as a spawning site for brown trout and rainbow trout in the physical values.	Text amendments made to s42A Version of 21.23.17[38].	Accept.

Appendix 2: Documents Relied On

The key documents that I have used or referred to when forming my views as set out in this evidence are:

- (a) The UCLS Section 32 Report, including the Upper Clutha 21.23 Schedules and Mata-au Clutha River PA Schedule 21.22.25 Landscape Methodology Report, dated October 2024 (**Methodology Report**);
- (b) The PDP,⁴⁴ and in particular: Chapter 1 Introduction, Chapter 2 Definitions, Chapter 3 Strategic Directions, Chapter 6 Landscapes, Chapter 21 Rural, and Chapter 30 Energy and Utilities, as updated by Environment Court decisions and consent orders in 2026;
- (c) The Proposed Otago Regional Policy Statement (**PORPS 2021**) (Appeals version), March 2026); and the relevant parts of the Otago Regional Policy Statement 2019 (January 2026 version)
- (d) Joint statement arising from expert conferencing for Topic 2 – Rural Landscapes; titled “Landscape methodology and subtopics 2, 3, 5, 6, 7, 8 and 11”, dated 29 January 2019;
- (e) Joint statement arising from expert planner and landscape conferencing for Topic 2 – Rural Landscapes; which related to “Strategic policies and priority area expert conferencing”, dated 29 October 2020;
- (f) The following Environment Court decisions concerning the PDP review Stage 1, Topics 1 and Topic 2 – Rural landscapes, appeals:
 - (i) *Transpower New Zealand Ltd v Queenstown Lakes District Council* [2023] NZEnvC 69.
 - (ii) *Hawthenden Ltd v Queenstown Lakes District Council* [2019] NZEnvC 160 (**Decision 2.1**)
 - (iii) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2019] NZEnvC 205 (**Decision 2.2**);
 - (iv) *Lake McKay Station Ltd v Queenstown Lakes District Council* [2019] NZEnvC 206 (**Section 2.3**);
 - (v) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2020] NZEnvC 158 (**Decision 2.5**);

44 <https://www.qldc.govt.nz/your-council/district-plan/proposed-district-plan> Revision 11 April 2025

- (vi) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2021] NZEnvC 60 (**Decision 2.7**);
 - (vii) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2021] NZEnvC 61 (**Decision 2.8**);
 - (viii) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2021] NZEnvC 124 (**Decision 2.9**);
 - (ix) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2021] NZEnvC 155 (**Decision 2.12**);
 - (x) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2022] NZEnvC 198 (**Decision 2.14**);
 - (xi) *Upper Clutha Environmental Society Inc v Queenstown Lakes District Council* [2022] NZEnvC 244 (**Decision 2.15**);
- (g) The landscape and planning Joint Witness Statements prepared as part of the PA Schedules hearing process.⁴⁵
- (h) The Environment Court Consent Determination and Orders in relation to the Existing PALS appeals, including:
- (i) *Treespace No1 Ltd Partnership v Queenstown Lakes District Council* [2025] NZEnvC 53;
 - (ii) *UCT Properties Ltd v Queenstown Lakes District Council* [2025] NZEnvC 54;
 - (iii) *Burdon v Queenstown Lakes District Council* [2026] NZEnvC 40 (**PALS Consent Determination**);
 - (iv) *Milstead Trust v Queenstown Lakes District Council* [2026] NZEnvC 41;
 - (v) *Burdon v Queenstown Lakes District Council* [2026] NZEnvC 42;
 - (vi) *Cardrona Cattle Company Ltd v Queenstown Lakes District Council* [2026] NZEnvC 43;
 - (vii) *Glencoe Land Development Company Ltd v Queenstown Lakes District Council* [2026] NZEnvC 44;
 - (viii) *Glendhu Bay Trustees Ltd v Queenstown Lakes District Council* [2026] NZEnvC 45;

45 Accessible online at <https://www.qldc.govt.nz/your-council/district-plan/priority-area-landscape-schedules/>

(ix) *Mee Holdings Ltd v Queenstown Lakes District Council*
[2026] NZEnvC 46; and

(x) *Passion Development Ltd v Queenstown Lakes District Council*
[2026] NZEnvC 47.

- (i) Original and Further Submissions on the UCLS Variation.
- (j) The s42A Report prepared by Ms Emily Frew on behalf of Council.