

Before the Independent Hearings Panel

Under the	Resource Management Act 1991
In the matter of	submissions on variation to introduce landscape schedules 21.22 and 21.23 into Chapter 21 Rural Zone of the Proposed District Plan.

Memorandum of Counsel on behalf of various submitters represented by Anderson Lloyd (Venters, Woodfields, Hopgood)

4th of September 2026

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May it please the Panel

- 1 In relation to the variation to the Queenstown Lakes Proposed District Plan (**PDP**) to introduce landscape schedules 21.22 and 21.23 (**Schedules**) into Chapter 21 Rural Zone, this memorandum is filed on behalf of:
 - (a) Eric Hopgood (**Hawthenden**); and
 - (b) the following submitters and further submitters represented by Anderson Lloyd:
 - (i) Mr. V H & Mrs. K M Woodfield (**Woodfields**);and
 - (ii) Dirk and Becky Venter (**Venters**);

collectively known as the **Poplar Beach Terrace Submitters**.
- 2 This memorandum responds to requests from the Panel during Day 3 of the Hearing for the Variation that:
 - (a) regarding Schedule 21.22.25 Mata-au Clutha River, further drafting on the landscape capacity rating for farm buildings within the Poplar Beach Terrace, noting that this is not an area necessarily characterised by 'more intensive pastoral land uses'; and
 - (b) regarding Schedule 21.23.27 Studholme Road, consideration as to if the landscape capacity rating for urban expansions should expressly reference land identified in the QLDC 2021 Spatial Plan.

Schedule 21.22.25 Mata-au Clutha River – Farm Buildings

- 3 Within the Popular Beach Terrace it is considered that there is 'some' landscape capacity for modestly scaled farm buildings. And having taken on board the Panel's observation that a list might have unintended consequences, we have added the words 'including but not limited to'. On this basis the following amendments are proposed:

Farm buildings – in those areas of the PA with more intensive pastoral land uses, **limited** landscape capacity for buildings that reinforce existing rural character and are sited to optimise the integrating effects of existing landscape and vegetation features. In the Intermediate Terrace of Poplar Beach, **some** landscape capacity for farm buildings including but not limited to storage facilities, processing buildings, irrigation infrastructure, workshops, implement sheds, produce handling facilities and associated rural structures and infrastructure where these support ongoing

productive rural land use. Such structures should be enabled in practical and operationally efficient locations and may utilise planting, landform, setbacks or other design responses to integrate with the wider landscape.

The establishment, extension, replacement and upgrading of rural production infrastructure associated with productive land use should be anticipated as part of the ongoing evolution of the working rural landscape of the intermediate terraces.

Schedule 21.23.27 Studholme Road – Urban Expansions

- 4 Schedule 21.23.27 would become relevant in the context of a resource consent process as per paragraph 4.2. In that context, a landscape capacity rating of 'some' is most appropriate, given the relevant land's underlying rural zoning and potential for urban development.
- 5 If a plan change is progressed to implement the QLDC 2021 Spatial Plan, the schedules are unlikely to retain significant relevance in their current form and would likely be reviewed as part the plan architecture relevant to that broader plan change.
- 6 Accordingly, the drafting for the landscape capacity rating for urban expansion in Schedule 21.23.27 should remain the notified drafting, as attached to the legal submissions for Eric Hopgood on behalf of Hawthenden Limited, dated 28 August 2026, namely:

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)

- 7 Notwithstanding the above, Counsel's primary position remains that the Upper Clutha schedules, including Schedule 21.23.25 and Schedule 21.23.27, are inefficient, unfair, unlikely to be relevant under the new regime and should be withdrawn in their entirety.

8 Please let us know if we can of any further assistance.

Dated this 4th day of September 2026



Maree Baker-Galloway / Hannah Zydenbos
Counsel for Hawthenden and the Submitters