

Before the Independent Hearings Panel

Under the In the matter

Resource Management Act 1991

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

Oral Submission of Dr John Cossens

August 2026

MAY IT PLEASE THE PANEL

Oral submission of Dr John Cossens

1. My name is John Cossens, I reside at 178 Mount Barker Road, Wanaka and I make this submission to the hearings panel as a landowner and resident.
2. While I consider this hearing is very much a rubber stamping exercise and fait accompli, I wish to make this submission to strongly object to the Upper Clutha Landscape Schedules in their present form and the way they have been developed. In short, the process has been a complete shambles and the schedules will have no meaningful benefit and simply add a further layer of cost, time and bureaucratic interference on landowners and residents.
3. The reason I consider the hearings to be a rubber stamping exercise is because of the make-up of the panel. Messrs Kensington and Smith were on the first panel to hear submissions on the Priority Landscape Schedules and recommended their full acceptance, so this time around they are hardly going to decline the Council's proposed non priority area landscape schedules because they have come from the same methodology and process as the PA schedules the previous panel recommended (largely unchanged) for approval. I cannot understand how the Council thought it appropriate to appoint two panel members who were also on the previous landscape hearing panel, where is the impartiality and lack of bias in that?
4. I need to state that I, along with Mr Haworth of the now defunct UCESI, was a strong supporter of an Upper Clutha Landscape Study but in contrast to Mr Haworth I wished it to be community and landowner led rather than driven by experts. It is important to note that the QLDC were strongly against the idea of an Upper Clutha Basin Landscape Study and yet here we are considering Council led and developed non-pa landscape schedules developed by outside landscape consultants.
5. Why has the schedule process been compromised? Well let's look at the background which the Council's Ms Frew, Ms Gilbert and their own counsel seem to have conveniently cherry picked, for not one of them has mentioned the

genesis of the non-pa schedules and it has been left to landowner counsel to provide the full picture. The real facts are:

- a. The Council and most of its experts/consultants were against any Upper Clutha Landscape study
- b. The Environment Court decided otherwise and directed that Priority Area landscape Schedules be developed (2019)
- c. Regrettably, the Court decided the QLDC was in the best position to develop the landscape schedules even though it had opposed them which seemed a bit like the wolf being asked to look after the henhouse.
- d. The Upper Clutha Environment Society (UCESI) appealed part of the decision to the High Court and sought that all areas be included in the Landscape Study.
- e. The QLDC gave into the UCESI demands and a mediated agreement was arrived at whereby the Council would develop 'non-pa landscape schedules'.
- f. Despite strong opposition, the Council persisted with a flawed PA landscape schedule methodology where reliable and robust consultation with residents and landowners did not occur before the schedules were developed (by two external consultants) and tried to say a flawed 'Let's Talk survey' was 'consultation' when the survey did not even ask for landscape values (see attached) and there was no way of knowing which PA landowners/residents lived in. Just a reminder that the High Court had previously held that 'consultation' was what occurred before a decision was made which was clearly not the case here as the draft schedules had already been developed before the survey results were considered.
- g. The Council and PA hearings panel tried to say that any submission objecting to the PA schedule development process, consultation and methodology was out of scope and so the hearings became somewhat of a foregone conclusion and essentially a waste of time as playing around with the words of the schedules was a pointless exercise akin to moving chairs on the Titanic.
- h. The PA schedules were voted into law but with no mechanism or robust methodology for monitoring landscape change which does make them meaningless and simply a 'snapshot in time' as Ms Gilbert has previously alluded to.
- i. Incredulously, despite its obvious flaws, the Council has used the same methodology to develop the non-PA schedules and even replicated the Let's Talk Survey, yes, the one that doesn't ask for landscape values! I submit the Council held with the same flawed methodology and consultation because they

knew they were unaccountable based on their reasoning these matters are out of scope. The matter of scope in regard 'consultation' seems to have been disregarded by Ms Frew who goes to some lengths to justify the consultation method employed which would suggest she considers it to be 'well within scope'.

- j. In the meantime, the UCESI, which sought the non-PA landscape schedules in the first place is now no longer in existence and yet the Council is continuing with schedules nobody wanted, including itself. If that is not a complete waste of time, effort and money, I don't know what is!
 - k. Two members of the previous PA landscape schedule hearings panel are appointed to hear the non-PA panel which would make it almost impossible for them to make a decision counter to their previous one.
 - l. Perhaps what is even more unbelievable, is that with the replacement of the RMA, under the new regime, it is highly likely the landscape schedule overlay, particularly for rural character landscapes (RCL) will be removed. And yet, the panel and the Council have at great expense to everybody, pushed on when the most pragmatic and sensible option would have been to pause the schedules until the new RMA comes into effect.
6. So it becomes obvious why I consider the whole process has been a joke, the consultation 'token' and why this latest panel hearing is simply a rubber stamping exercise.
7. In terms of the Council's evidence put before the panel, there are some items that need to be addressed.

INFORMED BY THE COMMUNITY OR EXPERT LED?

8. Both Ms Frew and Ms Gilbert mention the non-PA schedules as being 'community led'. This is complete nonsense and an insult to the community. While Ms Frew is new to the district plan appeals and inexperienced, Ms Gilbert has been there throughout and would well know, the landscape schedules have been led by consultants not the community. It is simply wrong of Ms Gilbert to say, *'I confirm that an expert assessment approach, informed by community input has informed the s42A Version of the Schedules appended to Ms Frew's s42A Report.'*¹

¹ Ms Gilbert, Evidence in Chief, Upper Clutha Landscape Schedules Variation, May 2026 [5.4]

9. By way of example to highlight the lack of community input, the Council summary of responses² to the let's talk survey for the non-PA schedules, states that just 15 persons responded and a cursory investigation shows that of those 15 'persons', 13 responses were from law firms or planning consultants. If relying on the principal 'consultation occurs before a decision is made', how can the Council, Ms Frew and Ms Gilbert possibly say the schedules were 'informed by community input'? That's a joke right, where Council seem to think 15 'persons' made up ostensibly of advocate comments is acceptable as 'community input'.
10. Even now, as we proceed to the panel hearings, close to 95% of submission comments are from advocates on behalf of landowners. That in itself is nothing new where only those who can afford to engage consultants and legal teams make it to this stage of appeal hearings but it does show how removed real community input is from the landscape schedules and should jolt the panel into asking itself a very simple question – **What are the real landowner and community landscape values for a particular landscape schedule?** I can answer that question for the panel – there are none.
11. So I am somewhat incredulous that Ms Frew in her evidence suggests that the consultation process was sufficient. Ms Frew states:

The consultation that was undertaken for the UCLS Variation is set out in detail in paragraphs 4.1 to 4.22 of the s32 Report. Between March and April 2022, Council undertook community pre-consultation on PA and non-PA Schedules, prior to the notification of the PALS Variation. Council then undertook pre-consultation on the non-PA RCL Schedules and the Mata-au Clutha River PA prior to the notification of the UCLS Variation. This pre-consultation, between July and August 2023, consisted of a drop in session on the 4 July 2023, and an online session between 22 June and 6 August via the Council's Let's Talk Page.

The purpose of both pre-consultations was to gather the community's perspective on the values associated with landscapes in the Upper Clutha. This feedback was then used to help inform the values and attributes that within each of the Schedules.

And further concludes,

² Clause 34 – Feedback and recommendations

*Based on the above, I consider that Council's approach to consultation demonstrates its awareness of, and compliance with Schedule 1 process requirements, and that it provided opportunities for affected landowners and others to engage in the UCLS Variation.*³

12. Surely Ms Frew cannot be inferring that 15 responses from mostly advocates and consultants, meets the requirements of the Schedule 1 process? For her edification I refer Ms Frew to how the Court of appeal viewed consultation:

- a. Consultation is not to be equated with 'negotiation'. The word 'negotiation' implies a process that has as its objective arrival at agreement. However, 'consultation' may occur without those consulted agreeing with the outcome.
- b. Consultation is the statement of a proposal *not yet fully decided on*.
- c. Consultation includes listening to what others have to say and considering the responses.
- d. **The consultative process must be genuine and not a sham.**
- e. Sufficient time for consultation must be allowed.
- f. The party obliged to consult must provide enough information to enable the person consulted to be adequately informed so as to be able to make intelligent and useful responses.
- g. The party obliged to consult must keep an open mind and be ready to change and even start afresh, although it is entitled to have a work plan already in mind.

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HIGH LEVEL OR EXPLICIT?

13. In regard my experience of the use of the landscape schedules and the Council's attempt to frame them as 'high level', this is far from the case. In my own rural subdivision consent applications and involvement with others, council consultants place considerable weight on the landscape schedules and in particular, the 'landscape capacity'. I refer the panel to a comment from a Council contracted landscape consultant who, when referring to the schedules commented:

³ Ms Frew, S42 Report on behalf of the QLDC – Upper Clutha Landscape Schedules Variation, [9.6-9.9]

⁴ Wellington International Airport v Air New Zealand [1993] 1 NZLR 671, 675.

*An explicit assessment of the landscape capacity was provided as a Very Limited Capacity to absorb residential rural living. This is stated in the PDP as outlined in Section 21.23.1 Cardrona River / Mount Barker Road PA: Schedule of Landscape Values as “**Rural living – very limited capacity to absorb additional rural living without cumulative adverse effects on naturalness, aesthetic, rural character and shared and recognised attributes and values.**”⁵*

14. So while the Ms Gilbert and Ms Frew might argue that the schedules and their capacity are to be viewed as ‘high level’, in practice that is not the case and landscape consultants view the capacities as policy and ‘explicit’.
15. While I am no ‘expert’ in the true sense, I have undertaken several small rural subdivisions and have done every part of the process myself and so have a unique practical perspective on rural living resource consent applications. From my own experience, I would suggest that while the schedules are useful in providing an introductory background of landscape attributes, they are not true landscape ‘values’ where a value in its truest sense is defined *as the relative worth, meaning, or emotional attachment that people and society assign to a particular environment or place*. The key part of that definition is ‘people and society’ or in this case ‘residents and landowners’ not an individual landscape consultant. The simple question for the hearings panel and/or the Council is **‘please point to the landscape values (from residents and landowners) of the non-priority areas?’** Until the panel can be reliably informed of the true landscape values (not those of 13 advocates), the non-pa schedules in their current form must be rejected.

ARBITRARINESS AND INCONSISTENCY REMAINS

16. I have also seen how landscape schedules can be open to misinterpretation. I refer the panel to RM220464 (Taylor) and RM220462 (Grieve), two rural (2-lot) subdivision consent applications close to each other on Ballantyne Road where MS Gilbert was the Council landscape reviewer. A previous neighbouring property had obtained consent for a 2 lot subdivision. The Grieve and Taylor properties were almost identical to the one approved and yet the Council and Ms Gilbert opposed the subdivisions on landscape grounds using the landscape schedules as reasons to decline. Ultimately, the two consent applications were declined by a hearings panel. The Taylor decision

⁵ See landscape review RM240648

was appealed to the Environment court while the Grieves were unable to, given the likely significant costs involved in an appeal. Close to two years later, the Taylor's obtained consent after a last minute mediated agreement with the Council, weeks before the proceedings were intended to start.

17. However, what is so concerning with these two consent applications, is that while the Taylor appeal was going through the process, two other neighbouring properties, again almost identical in characteristics, were approved non-notified, yes non-notified! There has been a third approved non-notified this year.

18. So these two consent applications are a good (or bad) example of how inconsistency remains in the consenting process and despite the promises of improved efficiency and reduced costs, arbitrariness still remains and expert opinion trumps landscape value schedules. The financial and person stress to the Grieve and Taylor families was in my view reprehensible and needless.

UTILITY OVER TIME?

19. Counsel for the QLDC stated

Ms Gilbert considers the schedules would have high utility to landscape experts in the assessment of future resource consents. The high-level guidance in the Schedules improves consistency in landscape assessments, improves certainty for plan users, and reduces costs of resource consent applications. As described in Ms Frew's Rebuttal, the PALS schedules have already proven useful tools for consents officers. Additionally, section 35 of the RMA and Chapter 3 of the PDP also requires the Council to monitor the efficiency and effectiveness of the Rural Zone provisions. These schedules therefore also assist the Council to monitor the protection, maintenance, or enhancement of the respective landscape values, by having a baseline to assess change against.

20. With respect, this has no bearing to the reality on the ground and is just theoretical musings. As shown with the Grieve and Taylor examples (and I am sure there are others) plan-user certainty has not improved, costs are the same if not greater and Council does not undertake any quantifiable measurement of cumulative effects. I would note that Ms Frew's example referred to by counsel talks to a benefit for council officers but makes no mention of plan users so becomes a rather irrelevant example.

21. QLDC counsel also state their belief that ‘

It is submitted that the fact that the environment may change over time (including the landscape values and capacity of that environment) does not present a reason that the Schedules should not be included in the PDP. Any site specific assessment under SP 3.3.45, regardless of when that site specific assessment is undertaken (e.g. one month or one year after the schedules are introduced), can displace the content of the schedules (including due to changes occurring since they were introduced) and therefore the schedules do not ‘lock in’ landscape values or capacity.⁶

And further,

The utility of the non-PA UCLS schedules outweighs the concern that the Schedules will become out of date, because that concern can be clearly accommodated for via a resource consent specific landscape assessment.

22. If a specific landscape assessment can ‘displace’ a landscape schedule then surely the utility of the schedules comes into question and it would appear they could become little more than an out of date ‘high level’ overlay which simply imposes more time and cost for plan-users. This is especially so if we accept Council’s view that in the end consent decision come down to differences in expert opinion. The arbitrariness and uncertainty of rural subdivision consenting which Judge Hassan and the Court were so concerned with, and sought to reduce, still remains. This inconsistency is even apparent in Ms Frew’s views of the utility of the landscape schedules and those of QLDC counsel where Ms Frew considers case by case landscape assessments to be inefficient⁷ while council legal submissions suggest site specific assessment displace landscape schedules even though Ms Frew considers case by case assessments to be inefficient. So it would be appear Council are suggesting site specific assessments are inefficient and displace(trump) landscape schedules. If that is the case why bother with them?

23. Counsel for the QLDC have spent some time in their legal submission talking about the ‘utility over time’ of the landscape schedules and I accept longitudinal cumulative effect measurement would be a most valuable exercise to show change in landscape

⁶ QLDC legal submissions. Upper Clutha Landscape Schedule Variation, August 2026, [6.18-6.20]

⁷ Ms Frew, Rebuttal on behalf of QLDC, Upper Clutha Landscape Schedule Variation, August 2026 [7.2]

values and attributes. However, one of the most critical failures of the landscape schedules is that they offer no means of quantitative analysis of cumulative effects or change in landscape values remembering that cumulative effects relate to changes in people's values and attitudes. The only current methodology for measuring cumulative effects is through the opinion of landscape experts who more than likely will be a different people to who first did it. Solely relying on expert opinion is accepted as an unreliable and unquantifiable process. The question for the panel must be – **how will cumulative effects and changes in landscape values be measured and accounted for** or will the panel ignore this critical issue like they did last time for the priority area landscape schedules?

FAILURE TO IDENTIFY RURAL LIVING OPPORTUNITIES

24. One of the most damning failures of both the PA and non-PA schedules is that neither have identified opportunities for future rural living development as specifically requested by the Environment Court. In fact, the schedules have done the opposite and the Council's landscape experts have staunchly recommended that within the PA and non-PA landscapes there are no areas capable of some future rural living. That is an indictment of the process as no rational person could believe that in one of the fastest growing areas in New Zealand, no areas within the RCL are capable of future rural living.
25. The reality is that the market and case by case consent applications are determining rural living opportunities which is a very inefficient, unstructured and expensive piecemeal approach. The earlier example I used of the five or more approved 2 lot subdivisions (as small as 2.0ha in size) in what is referred to as the Ballantyne triangle highlights this ad hoc approach. As I said earlier, it is inconceivable that the landscape experts did not identify any areas capable of further rural living development. Ideological views of a theoretical landscape are one thing, but practical reality in a fast growing region is another. I would wager, the growth over the last few years has already made the landscape schedules obsolete. For example, within the Cardrona/Mt Barker PA in the last 5 years there are already some 30 or more consented or in the process of being consented rural lots and yet this was a PA with a capacity designated as being 'extremely limited'. This ad hoc market driven development highlights how meaningless landscape schedule capacity assessments have become.

CONCLUSION

26. In conclusion, if the panel considers my submission to be scathing of the landscape schedules, then it has served its purpose. As I have said, the most damning features of the schedules are:

- a. The whole process of landscape schedule development has been flawed, lengthy and shambolic.
- b. Consultation was a sham and no sensible person could conclude that the comments of 15 (mostly advocates) could be construed as meaningful and useful consultation. RMA Schedule 1 processes were not met.
- c. The schedules were not community led and do not provide a single line or paragraph on what the 'landscape values' are (in the true sense) of the areas in question. If the panel cannot answer the question of 'what are landowner and resident landscape values of the non-priority areas', then the schedules must be sent back to the Council to answer that question.
- d. Without identified landscape values, no cumulative change can be measured over time.
- e. There is no recognised robust methodology provided for measuring landscape change.
- f. Arbitrariness and inconsistency remain in resource consent decision making
- g. Ad hoc development continues unabated and the schedules have failed to identify a single area capable of future rural living development. That reason alone is enough to reject the landscape schedule in their current form.

Dr John Cossens

Wanaka

31 August 2026

Memo

To:	Alyson Hutton, Planning Policy Manager
From:	Daniel Hadfield, Senior Policy Planner, Bridget Gilbert (Consultant Landscape Architect)
Date:	October 2024
cc:	David Wallace, General Manager Planning and Development
Subject:	C34 Feedback on Material Proposed to be Incorporated by Reference in the PDP

Purpose

The purpose of this memo is to outline the feedback received on the material proposed to be incorporated by reference as part of the upcoming Upper Clutha Landscape Schedules Variation to the Proposed District Plan (PDP). It also describes the changes that have been made to the Proposal in response to the feedback received, where relevant.

Background

Clause 34 of Schedule 1 of the Resource Management Act 1991 (RMA) sets out requirements for a variation or plan change to a proposed plan that incorporates material by reference. This requires a local authority to *allow a reasonable opportunity for persons to comment on the proposal to incorporate material by reference and consider any comments they make*. This is required to be done before the variation or plan change is notified.

Upper Clutha Landscape Schedules Variation

The purpose of the Upper Clutha Landscape Schedules is to introduce: one Priority Area (PA) landscape schedule for the Clutha River Mata-Au, and 12 non-PA landscape schedules for Rural Character Landscapes (RCLs) within the Upper Clutha.

The landscape schedules are a tool to assist with the identification of the landscape values that are to be protected or maintained or enhanced within each schedule area and related landscape capacity. They contain both factual information and evaluative content and are to inform plan development and plan implementation processes and assist technical landscape assessment.

Feedback

Feedback was sought on the proposal to incorporate by reference the maps of the areas associated with the landscape schedules that will be introduced as part of the upcoming Variation to the PDP. Feedback was collected via Council's Let's Talk page and was open for 10 working days from the 19th of August 2024 to the 30th of August 2024. In total 15 persons provided feedback on the material, with a total of 68 individual feedback points.

While much of the feedback commented on the appropriateness of the proposed mapping of the schedule areas (with some respondents seeking to exclude land / properties from the mapped areas), some respondents provided feedback on the text of specific landscape schedules and what this might mean for future development.

Council has made some amendments to the text of the landscape schedules in response to this feedback which is set out below. Any further changes to the text of the schedules can be addressed through a submission on the Variation once it is renotified.

Once notified, there will be an opportunity to make a submission on the Variation which will include the maps and schedule content. However, any mapping submissions should be limited to adjustments between adjoining Rural Character Landscapes. This may, for example, result in one schedule 'taking over' an area that was mapped as part of a different schedule.

Seeking changes to other boundaries (for example, where an RCL meets an urban zone or an ONL/F) would not be within scope as the landscape classifications of the Rural Zone (and RCL, ONL and ONF) have already been confirmed through the development of the PDP and are not within scope of the Variation. The same applies to any rezoning of land, which is not the subject of this Variation.

Mapping changes to the Mata-au Clutha River Priority Area are not within scope as the boundary for this area has been determined by the Environment Court.

Changes made following C34 Feedback

Council Staff have made some minor changes mapping and also to the text of specific landscape schedules. This includes:

- Renaming of the 21.23.15 Hāwea Terrace Landscape Schedule to Hāwea Basin (and consequential amendments to update the naming in other schedules);
- Inclusion of areas of open space (zoned Informal Recreation and Community Purposes) to the mapped area for 21.23.15 Hāwea Basin schedule and reference to these areas in the schedule;
- Minor boundary adjustment to the western end of the map that accompanies 21.23.10 Northern End of Pisa / Criffel Range Foothill to align with the Rural Zone;
- Minor amendment to the PA boundary for the Mata-au Clutha River to ensure that it aligned with the ONF mapping in the PDP Planning Maps, and a consequential amendment to the mapped area for 21.23.9 Wānaka Airport Environs.
- Amendments to the schedule text where such changes are supported by technical landscape advice (Schedules 21.23.9, 21.23.11, 21.23.13, 21.23.14 and 21.23.15).

The discussion below sets out the Council's more detailed consideration of the feedback received.

Feedback Received on Material Proposed to be Incorporated by Reference

Respondent	Point no.	Summary of Feedback	Council Response
Todd and Walker (Hawthenden Trust)	1.1	That the Hawthenden properties affected by the Variation and proposed to be included in Schedule 21.23.7 – Studholme Road be 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 classification corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). At this point in time there is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting, which would justify exclusion from the schedule area.
	1.2	That the inclusion of the Hawthenden properties in the Variation Schedule will make it substantially more difficult to use the land and limit Hawthenden's ability to undertake residential development that is needed in Wānaka.	The inclusion of the land in a mapped schedule area does not change the current zoning of the land, and only serves to link to the schedule that provides further description of the landscape values and characteristics of the land. In the event that residential development is sought, either resource consent or a plan change can be sought, which is a separate process.
	1.3	That the Hawthenden properties are being encroached by the Wānaka Township with the western boundaries of the properties bordered by various visitor accommodation activities with additional residential development nearby which has changed the character of these properties in relation to the wider Schedule land.	Addressed in #1.1.

	1.4	That if the Hawthenden properties are not removed from the Schedule, the entire Studholme Road Schedule be removed from the Variation as it has not reasonably been established that the Schedule holds particularly important Rural Character Landscape values and competing land-use options have not been addressed (including potential future areas suitable for lifestyle development).	Addressed in #1.1. Additionally, the schedules do not need to establish 'particularly' important values. Schedule text changes can be addressed through a submission on the Variation once notified.
	1.5	That if the Schedule is not removed from the Variation, that the Schedule be amended to follow a more logical and defensible boundary which properly encapsulates the character, landscape, and other variables of the area.	Addressed in #1.1.
Anderson Llyod (Laing Dairy Limited)	2.1	That maps are excluded from the type of written material that may be incorporated by reference in a plan or proposed plan under Clause 30 of Schedule 1 of the Resource Management Act 1991 and should be deleted.	The Environment Court in Topic 2, Decision 2.7 confirmed that the Council could incorporate maps by reference on a reference file. [14] "We find that the balance weighs in favour of having mapping accompany the listing of Priority Areas. The maps can either be set out in the PDP or incorporated by reference [Footnote: See Cl 30 of Sch 1, RMA] to a suitable QLDC file." [15] "Our determination allows for QLDC to elect which of those two approaches it prefers (i.e. an amended SP XA 1 that provides for the mapping in the PDP at this stage or one that incorporates that mapping by reference to an accessible QLDC file) Directions are made for QLDC to report back on its election."

	2.2	That alternatively the LDL land should be excluded from the Hāwea Terrace landscape area on the basis that the land is uneconomic and not suitable for productive farming.	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). At this point in time, there is nothing from a landscape perspective that differentiates these properties from the broader s7(c) setting, which would justify exclusion from the schedule area.
	2.3	That the Hāwea Terrace landscape area lacks defensible edges due to the Special Housing Area, the Longview Subdivision, the Exchange Land and the rural residential zoned land south of Camp Hill Road.	Addressed in #2.2.
	2.4	That the LDL Land and the wider Hāwea Terrace landscape area have low associative, physical and perceptual values which do not warrant protection from subdivision and development.	This can be addressed through a submission on the Variation once notified.
	2.5	That the LDL Land represents a logical extension to the rural residential zoned land south of Camp Hill Road.	This feedback suggests a rezoning is sought which is not within scope of either the C34 feedback, or the Variation.
	2.6	That Lot 1 DP 460542 held in Record of Title 608710 and the Exchange Land are subject to a land exchange agreement between LDL and QLDC. This exchange is conditional upon QLDC approving the subdivision of land (which has now occurred by way of RMA 230509 and issue of LT 482093) and on the issue of all necessary consents and approvals required to enable the parties to complete the transfer. Lot 1 DP 460542 should be excluded from the Hāwea Terrace	The exchange land is zoned Informal Recreation Zone outside of the Urban Growth Boundary. The classification of the land as RCL has been confirmed through the development of the PDP. The RCL corresponds to a RMA s7(c) landscape (i.e. an amenity landscape). At this point in time there is nothing from a landscape perspective that differentiates this land from the broader s7(c) setting, which would justify exclusion from the schedule area.

		landscape area to ensure the variation does not interfere with the transfer.	
	2.7	That the Exchange Land continue to be excluded from the Hāwea Terrace landscape area.	Addressed in #2.6.
	2.8	That the eventual Hāwea Terrace landscape schedule should recognise that the Hāwea Terrace landscape area lacks defensible edges due to the Special Housing Area, the Hāwea Domain (Informal Recreation Zone) and the rural residential zoned land south of Camp Hill Road.	This can be addressed through a submission on the Variation once notified.
Anderson Llyod (NW & DJ Pittaway Family Trust)	3.1	That maps are excluded from the type of written material that may be incorporated by reference in a plan or proposed plan under Clause 30 of Schedule 1 of the Resource Management Act 1991 and should be deleted.	Addressed in #2.1
	3.2	That the Trust land is excluded from the respective maps on the basis that the land is geographically and topographically dissimilar to the Clutha River / Mata Au.	The Variation relies on the mapping confirmed by the Environment Court for the Mata Au Clutha River Priority Area. That mapping aligns with the ONF boundaries confirmed by the Environment Court. As a result, the Variation is not seeking submissions on the mapping of this Priority Area. If there was any disagreement with the boundaries and mapping, then the Environment Court decision could have been appealed.
	3.3	That the Trust land is less natural and outstanding than the Clutha River/Mata au due to its range of existing and consenting activities and proximity to the Wānaka Airport.	Addressed in #3.2.

	3.4	That the Trust Land represents a logical extension to the Rural Residential, Lower Density Suburban Residential and Settlement zoned land to the south.	This feedback suggests a rezoning is sought which is not within scope of either the C34 feedback, or the Variation once notified.
	3.5	That the eventual Clutha River / Mata Au Schedule recognise that the flat land above the river is topographically and geographically dissimilar to and less natural and outstanding than the river and its slopes.	Comments 3.5 to 3.10 relate to schedule content which can be addressed through a submission on the Variation once notified.
	3.6	That the flat land above the river has moderate physical, associative, and perceptual values	
	3.7	That the flat land above the river has some landscape capacity for visitor accommodation and tourism activities, earthworks, rural living, transport infrastructure and urban expansions	
	3.8	That the eventual Wānaka Airport Environs Rural Character Landscape Area Schedule recognise the area has low physical, associative, and perceptual values, including due to the airport and the range of existing and consented activities at the Trust Land and within the wider area.	
	3.9	That the Wānaka Airport Environs Rural Character Landscape Area Schedule should recognise that the area lacks defensible urban edges due to the Wānaka Airport	
	3.10	That the Wānaka Airport Environs Rural Character Landscape Area Schedule should recognise that the area has	

		some landscape capacity for visitor accommodation, tourism activities, earthworks, rural living, transport infrastructure and urban expansions	
Dan Curley (Anne Steven)	4.1	That mapping of the Hāwea Dam should be remapped as set out in the attachment	The mapping change is not required as long as the distinctive landscape character and visual amenity attributes of that discrete area are identified in the Schedule. Amendments have been made to 21.23.15 to reflect the localised characteristics. Any other issues identified can be addressed through a submission on the Variation once notified.
	4.2	That the Hāwea Terrace should be renamed as Hāwea Basin as it is mostly pro-glacial outwash plain (which the river has cut into creating relatively minor terrace landforms) and coalescing piedmont alluvial fans.	This change is considered appropriate and the schedule title and map reference for 21.23.15 has been amended accordingly, (with consequential changes made in other schedules and the Methodology Report where necessary).
	4.3	That the landscape area within the suggested HDLA does not share the same physical structure and landscape character, and landscape values. It is strongly influenced by the immediately adjacent Hāwea urban area, and the ONL of Mt Maude. While relatively small in area, it is a distinct and self-contained place with a strong sense of entry from north and south	Addressed in #4.1.
Helen Caley (Fulton Hogan)	5.1	That it is understood the landscape schedules will set out the capacity of a landscape to accommodate particular activities and while there is no change to the rules, the policy position may change for certain activities and the	Landscape capacity ratings can be addressed through a submission on the Variation once notified.

		starting point for the consideration of any effects may be set based on the maps.	
	5.2	That the site (and adjoining dryland and quarry to the north) is visually distinct from the remainder of the mapped area by virtue of its differing land use and recent landscape planting has also changed its character with the removal of shelterbelt pines and replacement with natives.	Existing quarries are acknowledged in 21.23.13 and minor amendments have been made to 21.23.13 to reflect the vegetation referenced in the feedback. Any other issues identified can be addressed through a submission on the Variation once it is notified
	5.3	That the mapped areas do not cover all Rural Zoned land in the vicinity of the site which may indicate these areas will not be subject to a landscape schedule. It is unclear from the information currently available why some areas have been mapped and others have not.	The schedule covers all Rural zoned land in the immediate vicinity of the site, with the exception of the Clutha Mata Au (which is covered by its own Priority Area Schedule). Other Rural Zoned areas of the Upper Clutha are covered by Priority Area Landscape Schedules that are already included in the PDP or via Schedules that will form part of the Variation once notified.
	5.4	That given the landscape character of the site substantially differs from the majority of the Kane Road and Luggate - Tarras Highway mapped area and it appears the site should not be included in the mapped 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) and established quarries are an accepted part of s7(c) landscapes.
Alex Durran	6.1	That the respondent was not informed that there is potential rezoning of their property, or that it is involved in the QLDC development plan.	The Variation does not address the matter of zoning at all, and does not propose to rezone any land. That is why there was no notice or reference to rezoning as part of this Variation. The reference to a Queenstown Lakes District Council 'development plan' is not clear.

	6.2	That the maps, which include the respondent's property, and large established subdivision of Loess Lane has been incorrectly positioned in a rural character schedule on the Hāwea Moraine map. All the other properties in Hāwea (e.g., Butterfield Road) are placed in land parcels and properties (which are outside the Rural Character Landscape), and the Loess Lane subdivision should also be in this category.	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) and rural living can be an accepted part of s7(c) landscapes. There is no land parcels and properties schedule in the PDP. However, there is a parcels and properties layer which delineates parcel and property boundaries.
	6.3	That the properties on Loess Lane should be removed from the proposed protected area on the Hāwea Moraine map, called rural character landscape, and placed in the land parcels and properties.	Addressed in #6.2.
	6.4	That the Loess Lane properties are already subdivided and built on which makes them different to the rest of the proposed rural character landscape area which is all farmland.	Addressed in #6.2 above.
	6.5	That it would be courteous to notify people if their home is placed in a region that is to be rezoned so they are able to give feedback on huge plans that will implicate their future.	The maps that accompany the landscape schedules do not show or indicate any areas proposed to be rezoned. They show the mapped areas which will accompany specific landscape schedules. The Variation does not address the matter of zoning at all, and does not propose to rezone any land.
Terry Drayton	7.1	That consideration needs to include all of Studholme Road South given what has occurred in Orchard Road with urban	This can be addressed through a submission on the Variation once notified.

		sprawl and the 30 year plan to intensify Wānaka South with 5000 dwellings it is imperative to provide a substantial green belt along Studholme Road South to provide some relief from this proposed urban sprawl.	
Maddy FAMILTON (Mandy Bell, Criffel Station)	8.1	That it is not clear from either the public notice or from the information on the Council's webpage whether the current consultation using the Let's Talk page is intended to be formal consultation or informal feedback as it is not explicit whether the renotification of the Landscape Schedules Variation will also include the mapping.	The Variation will seek limited submissions on the maps that accompany the Rural Character Landscape Schedules as set out earlier in this document. The Variation will not seek feedback on the map that accompanies the Mata Au Clutha River Priority Area since it reflects the ONF boundaries confirmed by the Environment Court. There was an opportunity to appeal the Environment Court decision at that time.
	8.2	That it is necessary for there to be an opportunity for the public to make formal submissions on the mapping once the Schedules are publicly notified.	Addressed in #8.1
	8.3	That the Northern end of Schedule 21.23.10 (as shown in the attached image) should be excluded from the mapping as the site is currently subject to the PDP appeals process seeking a rezoning to the Rural Industrial Subzone and the appeal is substantially through the mediation process with Council.	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). At this point in time there is nothing from a landscape perspective that differentiates these properties from the broader s7(c) setting. In the event that the other appeal seeking rezoning was to be approved, then this could result in a consequential change to the relevant schedule text, to reflect the activities anticipated by any area of Rural Industrial Sub Zone applied to the land.

Louise Aubrey (WAI Wānaka)	9.1	That the land surrounding the Wānaka aerodrome is rural land and doesn't differ in character to the other land in this area that is not included in the 21.23.9 Wānaka Airport Environs.	The extent covered by the schedule corresponds to the area of RCL land. It excludes Wānaka Airport as that land is within the Airport Zone and is not classified as RCL under the PDP.
	9.2	That ownership should not impact the landscape schedules and that if the area outside of the existing Wānaka aerodrome footprint is to be removed from the 21.23.9 area, then the entire Wānaka Airport Outer Control Area should form the boundary by the process that area is excluded from being residentially developed as described in the Schedule values document.	Land ownership does not have an influence on the mapped extent of a landscape 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 s7(c) (amenity landscape). At this point in time there is nothing from a landscape perspective, that differentiates these properties from the broader s7(c) setting.
Jeff Brown (Mandy Bell, Criffel Station)	10.1	That it is not clear from either the public notice or from the information on the Council's webpage whether the current consultation using the Let's Talk page is intended to be formal consultation or inform feedback as it is not explicit whether the renotification of the "Landscape Schedules Variation" will also include the mapping.	The Variation will provide an opportunity to make submissions on both the maps and schedules that form part of this Variation. However, this should be limited to suggested adjustments to a boundary between adjoining Upper Clutha Landscape Schedules (non-PA ones), which could result in one schedule 'taking over' an area that was mapped as part of a different schedule. As noted earlier in this feedback, the Variation will not seek feedback on the map that accompanies the Mata Au Clutha River priority area since it reflects the ONF boundaries confirmed by the Environment Court.

	10.2	That it is necessary for there to be an opportunity for the public to make formal submissions on the mapping once the Schedules are publicly notified.	Addressed in #10.1.
Louise Aubrey (Scott Aubrey)	11.1	That the ability to retain rural character landscape values identified relies on being able to continue to utilise the land identified without undue constraints. This is because many of the values and attributes are derived from the ongoing utilisation of the land for rural activities.	This can be addressed through a submission on the Variation once notified.
	11.2	That blanket identification of the land between the State Highway and Clutha River Mata Au East of Luggate will cut across the enabling strategic provisions and rural provisions and such extensive identification does not achieve the sustainable management purpose of the Act.	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a s7(c) (amenity landscape) At this point in time there is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting. This can otherwise be addressed through a submission on the Variation once notified.
	11.3	That a key attribute of this area relates to it being perceived as the gateway to the Upper Clutha (particularly experienced from Cromwell-Wānaka) and therefore the land that is not visible from there should not be included in the PA as shown in the map provided with this feedback. Therefore, enabling landowners in this area to provide for their social, economic and cultural wellbeing while maintaining the rural character landscape values.	The Rural zoning of the land and its RCL classification has been confirmed through the development of the PDP. The RCL corresponds to a s7(c) (amenity landscape) There is nothing, from a landscape perspective, that differentiates these properties from the broader s7(c) setting. Further, 21.23.11 is not a Priority Area.

	11.4	That the approach described in the feedback would improve the efficacy of the PA by encouraging landowners to utilise land outside the PA and place less pressure on the PA itself and therefore better maintain its values.	This can be addressed through a submission on the Variation once notified. As noted above, 21.23.11 is not a Priority Area.
	11.5	That the area to the west of the PA includes land that has already been subdivided and is heavily influenced by adjacent development and therefore does not possess the values and attributes of the PA and should be removed (as shown in the map provided).	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) and rural living can be an accepted part of s7(c) landscapes. However, amendments have been made to 21.23.11 to better reflect existing residential land uses along the eastern and southern side of the area. Any other comments on values and attributes outlined in the schedules can be addressed through a submission on the Variation once notified.
	11.6	That given the strategic location of 21.23.11 East of Luggate, many uses raised through sustainable and regenerative needs, innovation, rural use adaption, or simply as demanded by regional growth will present as a logical fit to various parts of East Luggate RCL, especially Lot 2 DP 478726	This can be addressed through a submission on the Variation once notified.
	11.7	That Lot 5 DP 24216 and Church Road/State Highway 6/Shortcut Road triangle have similar attributes to Lot 2 DP 478726 where residential dwellings have been constructed with a variety of rural/farming activities undertaken. Lot 5 DP 24216 and Church Road/State Highway 6/Shortcut Road triangle have been excluded from the RCL zones which is	The areas cited as being excluded by the (current) schedules are already addressed under Priority Area 21.23.4 Church Road Short Cut Road. As an existing Priority Area, this area is already addressed in the PDP.

		inconsistent with assessing the urban growth boundary around Luggate and surrounds, in time regional growth will inevitably require for the expansion of urban development.	
	11.8	That on the outskirts of the existing residential zone development there is significant an undeveloped area south of Aliceburn Dr (Lot 601 DP 512669) that is not included in the mapped area, but residential sections already developed around Jacksons Rise (Lot 230-238, 241, 242 DP 507844 as shown in the map) and Recreational Reserve (lot 300 DP 507844) and neighbouring land have been included (in the mapped area), which clearly does not meet the values described in the Landscape Schedule. Similarly lots to the south of State Highway 6 are also included in the mapping which are already residentially developed and do not demonstrate key rural attributes.	Addressed in #11.5.
Louise Aubrey (Wai Wānaka) Kyle Willis	12.1	That the area seems to have been identified as it lies on the QLDC eastern boundary and forms the entrance to the Upper Clutha. Land that is not visible from the State Highway should not be included in the PA.	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. Further, 21.23.12 is not a Priority Area.
	12.2	That a map has been provided that shows the areas that are not visible from this area and the area highlighted in red should be removed from the PA to better provide for the need to enable landowners to provide for their social,	Addressed in #12.1. Other matters can be addressed through a submission on the Variation once notified.

		economic and cultural wellbeing while maintaining the rural character landscape values.	
	12.3	That using the 21.23.12 Sheepskin Creek: Schedule of Values document, the below map does not capture: • Indigenous evergreen shelter belt in a roughly north-south alignment through the centre of the lower sloping terrace. The trees in question are exotic evergreen. • Low intensity grazing on steeper areas. There are no significant tracts of steeper areas that are low intensity grazing. • Archaeological site G40/175 to be confirmed outside of boundary • There is not any area that would be considered high country • Rough vegetation covered upper escarpments • Moderate to high levels of naturalness - this is questioned as the majority of the mapped area is in developed pasture land • Changing snow cover, there is no resident snow cover within the mapped area.	Addressed in #12.1.
Louise Aubrey (Wai Wānaka) Pete Smalley and Jayne Davies	13.1	That the properties on Loess Lane be removed from the proposed protected area on the Hāwea Moraine map as these properties are subdivided and built on which makes them different to the rest of the proposed rural character landscape area which is farmland.	Addressed in #6.4.

Louise Aubrey (Wai Wānaka) Ben and Rebecca Trotter	14.1	That the landscape schedule proposal boundary lines are inconsistent with land formations and there is a potential conflict of interest with title held by Wanaka Airport not being included in the Priority Area when it doesn't differ to land on either side of it.	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). The excluded land the respondent refers to has a separate zone which is not RCL. Also addressed in #9.1 and #9.2.
	14.2	That there is concern around cultural values and that if we want to keep farming in this district we need to adapt, diversify and have an ability to farm in a way which is consistent with sustainable safe food production. Having to consult with local iwi about what is done on farm is an added cost and burden. If further consenting is required, it adds unnecessary costs and time.	Any cultural values reflected in the schedules can be addressed through a submission on the Variation once notified.
	14.3	That lines on a map are deciding the fate of farmers as it pushes up compliance costs and this leaves little option but to sell the land to overseas owners who do not have the same community mindset as local producers.	This can be addressed through a submission on the Variation once notified.
	14.4	That the schedules should make reference to the controlled environment agriculture location at the base of the east side of Wānaka Airport as there is already an operational resource consent in place which permits this activity.	21.23.9 has been amended to acknowledge this existing land use. Any other changes can be addressed through a submission on the Variation once notified.
	14.5	That including the area at the base of Luggate Hill will dampen the appetite and increase costs to cater for and expand local agri tourism.	Addressed in part in #14.1 and 14.4. Any other changes can be addressed through a submission on the Variation once notified.

	14.6	That the area highlighted in red should be removed from the schedules as it's not a good thing for Wānaka or the community if included.	Addressed in #14.1 and 14.4
Simone Creedy (Geoff Ross)	15.1	That the section on associative attributes and values has no regard for the fact that there are a number of High Country Stations in the area. A range of activities occur on high-country farmland in terms of production and associated infrastructure such as farm buildings, staff housing and earthworks.	21.23.15 has been amended to acknowledge these existing land uses. Any other changes can be addressed through a submission on the Variation once notified.
	15.2	That High Country Stations have a deep history of rural production, and these farming operations need to adapt to changing market conditions and this could result in a need for intensification of land uses and the development of associated farming infrastructure in the future. It is likely that diversification of land use will be critical in future and a description of landscape attributes and values developed today should not preclude diversification in future.	
	15.3	That traditional sheep and beef farming does not have the margins to support the conservation work required and diversification is likely to be needed to contribute to funding effective conservation efforts.	
	15.4	That this section does not recognise the small Hamlet development in areas like John Creek and Hāwea Flat and there is no recognition that parts of terraces at Lake Hāwea	

		Station, adjacent to the mapped area, are zoned rural residential in the Plan.	
	15.5	That the landscape capacity section is limiting, and the description of capacity needs to recognise the matters highlighted in the feedback and that in light of the modified nature of the Hāwea Flats area and its historic association with rural production. The capacity needs to be changed in these areas to enable the continuation of farming and rural production in a way that allows farmers to adapt their operations to meet changing market circumstances.	