

Before the Hearings Panel

In the Matter of the Resource Management Act 1991

And

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

Brief of Evidence of **John Edmonds** for Second Star Limited (submitter 48)

Dated: 11 September 2023

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INTRODUCTION

Qualifications and Experience

1. My name is John Edmonds, and I am a Principal of John Edmonds & Associates, a Queenstown based planning consultancy.
2. I hold the qualification of a Bachelor of Regional Planning from Massey University. I am a full member of the New Zealand Planning Institute.
3. I have 30 years' experience in planning and resource management roles, including strategic planning, master planning, urban design, policy development, project management and other resource management consultancy services. I have worked in both local government and private sector roles.
4. My previous roles include five years at Nelson City Council and six years with the Queenstown Lakes District Council (QLDC), most of that time (1997-2001) as the District Planner.
5. In January 2001 I went into private consultancy, establishing John Edmonds & Associates. In this role I have managed planners, environmental scientists and more recently surveyors and project managers. I have been personally responsible for master planning, strategic planning, preparing resource consent applications and assessments of effects, and been the principal consultant assisting with planning and environmental issues for a number of significant local developments. I have also presented evidence at numerous Council and Environment Court hearings.
6. I confirm that I have complied with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person, and I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.
7. I have been a trustee of the Queenstown Trails Trust for the past 9 years and have been the Chair of the Central Otago Branch of the New Zealand Planning Institute on numerous occasions. I am also a Board Member for the Wakatipu High School.

Code of Conduct

8. While this matter is not before the Environment Court, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise and I have not omitted material facts known to me that might alter or detract from my evidence.
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9. The key documents I have referred to in drafting this brief are:
- (a) The S32 Report.
 - (b) The notified version of the 21.22.19 ONL Mount Alpha and 21.22.21 West Wānaka Schedule of Landscape Values.
 - (c) The Section 42A Report (**s42A**) prepared by Ms R Evans.
 - (d) Evidence in Chief prepared by Ms Bridget Gilbert.
 - (e) Evidence in Chief prepared by Mr Jeremy Head.
 - (f) The amended 21.22.19 PA ONL Mount Alpha and 21.22.21 West Wānaka Schedule of Landscape Values.
 - (g) Landscape Evidence prepared by Mr Paul Smith for Second Star Limited, dated 8 September 2023.

SCOPE OF EVIDENCE

10. I have been engaged by Second Star Limited (**Second Star**) to provide evidence on a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23.
11. The following evidence covers Second Star's submission and further submission points that relate to the notified Mount Alpha and West Wanaka Landscape Schedules which affects Second Star's property. In particular, Second Star owns the land at Wanaka-Mount Aspiring Road (comprising Lot 1 DP 337193) (**Site**) which is included within the Mount Alpha (ONL) Landscape Priority Area (21.22.19) (**MA-PA**) and the West Wānaka ONL Landscape Priority Area (21.22.21) (**WW-PA**).
12. The evidence is provided in the following parts:
- (a) Executive Summary;
 - (b) Notified Version;
 - (c) Second Star Relief Sought in Submissions;
 - (d) Response to Section 42A and Evidence in Chief;
 - (i) Preamble
 - (ii) Capacity Terminology
 - (iii) Landscape Descriptors
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- (iv) Landscape Capacity Ratings
- (e) Conclusion.

EXECUTIVE SUMMARY

13. This evidence has been prepared to address the appropriate landscape classifications for the Site (described above).
14. The evidence sets out where amendments to the Landscape Schedules is sought.
15. I consider that:
 - (a) There is an inconsistency between the capacity terminology used in the PAs, and the intent of the PAs described in the Amended Preamble, including the definitions of the capacity terms.
 - (b) The MA-PA and WW-PA Landscape Schedule descriptions should be updated to more accurately emphasise and capture the attributes and values of landscape between Waterfall Creek and Glendhu Bay.
 - (c) The Site has *limited capacity* for visitor accommodation and tourism related activity and rural living activity.

NOTIFIED VERSION

16. The Site is subject to the notified Mount Alpha (ONL) Landscape Priority Area (21.22.19) and the West Wānaka ONL Landscape Priority Area (21.22.21).
 17. The notified version did not define the capacity terms, making it unclear on how the capacity ratings have been reached.
 18. The notified Mount Alpha (ONL) Landscape Priority Area (21.22.19) states that there was *very limited capacity* for visitor accommodation *in the Waterfall Creek to Damper Bay area and on the southern moraine plateau for visitor accommodation activities that are co-located with existing consented activities, designed to be of a sympathetic scale, appearance and character; integrate appreciable landscape restoration and enhancement; enhance public access (where appropriate); have a low key 'rural' character; and protect the area's ONL values.*
 19. The notified schedule states that there is *Very limited capacity for rural living development in the Waterfall Creek to Damper Bay area and on the southern moraine plateau that is: contained by landform and/or existing vegetation – with the location, scale and design of any proposal ensuring that it is generally not discernible from external viewpoints. Developments should be of a modest scale; have a low*
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key 'rural' character; integrate landscape restoration and enhancement; enhance public access (where appropriate); and protect the area's ONL values.

20. The notified West Wānaka ONL Landscape Priority Area (21.22.21) states that there is very limited capacity for visitor accommodation and tourism related activities that *are co-located with existing consented facilities; are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be visually recessive, of a modest scale and have a 'low-key' rural character; integrate appreciable landscape restoration and enhancement; enhance public access; and protect the area's ONL values.*
21. With regards to rural living development, the schedule states that there is *very limited landscape capacity for rural living development located on lower-lying terrain and sited so that it is contained by landforms and vegetation – with the location, scale, and design of any proposal ensuring that it is barely discernible from external viewpoints. The exception to this is views from Roys Peak, where rural living development should be extremely visually recessive. Developments should be of a modest scale; have a low key 'rural' character; integrate landscape restoration and enhancement; enhance public access; and protect the area's ONL values.*

SECOND STAR RELIEF SOUGHT IN SUBMISSIONS

22. Second Star sought:
- (a) That the landscape schedules be reassessed to include a further layer of capacity mapping that identifies areas within specific ONLs that have the capability to absorb some development, with specific reference to schedules 21.22.19 and 21.22.21.
 - (b) To ensure the landscape schedules apply at a priority area level to guide future development but not preclude it.
 - (c) To ensure it is clear that the capacity for development identified in the schedules is not to be applied or interpreted at a site-specific scale.
 - (d) To ensure the benefits of visitor accommodation are recognised and appropriately anticipated, subject to appropriate design and comprehensive landscape assessment.
 - (e) Any other consequential or alternative relief that otherwise addresses the matters raised in this submission.
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RESPONSE TO SECTION 42A REPORT AND COUNCIL'S LANDSCAPE EVIDENCE

23. The following addresses the key points raised by Second Star in relation to the Section 42A Report and Council's Evidence in Chief.

Preamble

24. I generally support the amendments to the preamble which clarify that the intention of the schedules is to apply at a high level. In particular, the clarifications that the PAs *'are to inform plan development and plan implementation processes.'*¹ And that *'The landscape attributes and values identified, relate to the PA as a whole and should not be taken as prescribing the attributes and values of specific sites within the PA.'*
25. I support the Amended Preamble where it states that *'Given the relatively high level landscape scale of the PAs, a finer grained location-specific assessment of landscape attributes and values will typically be required for plan development or plan implementation purposes (including any plan changes or resource consent applications). The PA Schedules are not intended to provide a complete record and other location specific landscape values may be identified through these finer grained assessment processes.'* However, consider that the information within the schedules needs to depict accurate landscape descriptions.

Capacity Terminology

26. The Amended Preamble includes an explanation of each of the five capacity terms.
27. I do not agree with the terminology used, in particular where 'No landscape capacity' is used. 'No landscape capacity' infers that there is no capacity within the PA for any further development. However, the explanation states that it means *'typically this corresponds to a situation where development of this type is likely to materially compromise the identified landscape values.'*²
28. There is disparity between the intention of the PAs described in the preamble, the terminology used to identify the capacity and the description of each of the capacity terms.
29. The capacity terminology should be amended to better reflect the potential capacity for development within each landscape area.

¹ Section 42A Report, Page 2 of Appendix 1 - Recommended amendments to the PA Schedules

² Section 42A Report, Page 2 of Appendix 1 - Recommended amendments to the PA Schedules

Landscape Descriptors

30. The MA-PA and WW-PA Landscape Schedule descriptions should be updated to more accurately emphasise and capture the attributes and values of landscape between Waterfall Creek and Glendhu Bay.
31. The evidence provided by Mr Smith outlines the necessary amendments to the MA-PA and WW-PA landscape descriptions. I agree with and adopt Mr Smith's assessment and recommended amendments, including;
- (a) That the landform description be amended to reflect the scale and nature of the hills wrapping around the base of Roys Peak.
 - (b) The need to recognise the importance of restoration vegetation and how this can enhance the naturalness of this landscape.
32. It is important that these descriptors are accurate as they are being relied upon and added to through resource consent applications to assist with integrating development into the landscape.

Landscape Capacity Ratings

33. Landscape Evidence has been provided by Mr Smith confirming that the capacity rating for visitor accommodation and tourism related activities, and rural living should also be amended to *limited capacity* from *very limited capacity*.
34. The landscape capacity ratings for 'Visitor accommodation' and 'Rural living' within MA-PA and WW-PA should be amended to reflect the landscape capacity more accurately. As outlined within Mr Smith's evidence there is capacity to absorb well located and designed development that will "*generally not be discernible from external viewpoints*".³
35. To summarise:
- (a) There is an inconsistency between the capacity terminology used in the PAs, and the intent of the PAs described in the Amended Preamble, including the definitions of the capacity terms.
 - (b) The MA-PA and WW-PA Landscape Schedule descriptions should be updated to more accurately emphasise and capture the attributes and values of landscape between Waterfall Creek and Glendhu Bay.
 - (c) The identified capacity rating for visitor accommodation and rural living should be *limited* (or equivalent terminology should this be amended).

³ Landscape Evidence prepared by Mr Paul Smith, Paragraph 31(a)

CONCLUSION

36. For the reasons identified, I consider that the capacity terminology should be amended, the landscape descriptors should more accurately reflect the attributes and values of the landscape, and the capacity rating for visitor accommodation and rural living should be described as 'limited' (or equivalent).



John Edmonds

11 September 2023
