

Summary of Evidence – Scott Edgar

On 11 September 2023 I filed a brief of evidence on behalf of a number of submitters including:

- Alpine Deer NZ LP (Submitter 146)
- Upper Clutha Transport Limited (Submitter 149)
- Cardrona Distillery Limited (Submitter 185)

My evidence in chief included general commentary in relation to the ONF/ONL and RCL Priority Area Preambles (the Preambles) and the landscape capacity rating scale before addressing matters of interest to my clients in relation to specific landscape schedules.

I participated in expert conferencing on 3 October 2023 and signed the resulting Joint Witness Statement (the JWS).

I consider that the updated Preambles and the amended capacity rating scale set out in the JWS are appropriate and provide clarity as to the intent and application of the landscape schedules and acknowledge the high level assessment that has informed their preparation.

I consider that, with the amendments set out in the JWS, the landscape schedules will provide useful guidance for future plan change and resource consent processes and will help ensure that the identified values of the PAs are appropriately protected (ONF/L), maintained or enhanced (RCL).

Alpine Deer NZ LP and Upper Clutha Transport Limited

The submissions of Alpine Deer NZ LP and Upper Clutha Transport related to the Church Road – Shortcut Road RCL PA Schedule (Schedule 21.23.4) and sought that the schedule better reflect the existing and enabled rural industrial activities within the Rural Industrial Sub-Zone to the east of Church Road.

In her rebuttal Ms. Gilbert recommended amendments to the schedule in response to these submissions. I understand that there is no JWS version of the Church Road – Shortcut Road RCL PA Schedule.

I consider that Ms. Gilbert's recommended amendments to the Church Road – Shortcut Road Schedule appropriately acknowledge the presence of the Rural Industrial Sub-Zone and the submitters' existing and enabled activities and, in combination with the JWS version of the RCL Preamble and capacity rating scale, satisfy the submissions of Alpine Deer and UCT.

Cardrona Distillery Limited

The submission of Cardrona Distillery Ltd related to the Cardrona Valley ONL PA Schedule (Schedule 21.22.18) and sought that the existing distillery complex was better recognised in the schedule.

I support the amended version of the ONL/F Preamble that has come out of the landscape and planning expert conferencing, as recorded in the JWS. This includes the amended scale for landscape capacity rating.

I have read the JWS of landscape experts on the Cardrona Valley ONL PA Schedule dated 5 October 2023. I consider that the amendments to the landscape schedule as a result of the landscape expert conferencing are generally appropriate and largely address the matters set out in the submission of Cardrona Distillery Ltd and my evidence in chief.

I note however that there is disagreement between Mr. Head and Mr. Espie in relation to the capacity rating component of the schedule. Based on the JWS I understand that Mr. Head does not support the inclusion of a capacity rating for Rural Industrial Activities while Mr. Espie considers that the inclusion of such a rating would be appropriate.

I agree with Mr. Espie that subject to suitable qualifiers a capacity rating that addresses the potential evolution of the distillery complex over time is appropriate and necessary.

I recognise that 'rural industrial activities' is a fairly broad term and its use in the capacity rating schedule could have unintended consequences in terms of suggesting that there may be capacity for rural industrial activities more generally within the PA. I understand this to be Mr. Head's concern in relation to its inclusion.

The addition of a capacity rating for 'rural industrial activities' was put forward in my evidence in chief as it was the PDP definition into which the distillery activities most comfortably fit. The PDP definition of 'rural industrial activities' is:

"the use of land and buildings for the purpose of manufacturing, fabricating, processing, packing and/or storage of goods and materials grown or sourced within the Rural Zone..."

While I consider distillery activities could fall within this definition it came to my attention following the expert conferencing that while they are not defined in the PDP distilleries, along with breweries, are provided for in the Rural Zone as a discretionary activity under Rule 21.4.24 (see below).

21.4.24	Craft distillery or brewery.	D
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I therefore consider that a capacity rating for distilleries or distillery activities would be appropriate provided that capacity rating emphasises co-location with the existing distillery (as was the intention of the capacity rating for rural industrial activities set out in my EIC). This would narrow the scope of activities to which the capacity rating would relate and may address the concerns of Mr. Head in this regard.

I therefore consider that the following capacity rating should be included in the schedule (incorporating and amending where necessary Mr. Espie's recommended wording and qualifiers set out in the landscape JWS for Schedule 21.22.18):

Distillery Activities – very limited landscape capacity. If and where such development is appropriate, it will have been co-located with existing distillery activities on the valley floor and is of a modest or sympathetic scale, has a low-key, visually recessive 'rural' character; and complements the existing character of the Cardrona settlement or the wider valley floor.

For consistency I consider that, if a capacity rating for distillery activities is included in the schedule then an appropriate definition should be added to the ONL/F Preamble. I consider that the following definition would be appropriate:

- *Distillery Activities: means the use of land and buildings for the production, storage and bottling of spirits and ancillary commercial activities.*

Scott Edgar

6 November 2023