21.22.17 PA ONL Victoria Flats: Schedule of Landscape Values

General Description of the Area

The Victoria Flats PA comprises the fluvioglacial outwash terrace on the true right bank of the Kawarau River between Nevis Bluff and the Waitiri peninsula, and the immediate mountainous landforms enclosing the flats (including the eastern faces of Mt Mason). It is a small landscape unit within the wider ONL of the Mt Mason/Mt Rosa/Mt Edward range, the southern Pisa Range and the Carrick and Horne ranges and the Doolans (outside the district boundary). The PA comprises surrounds two areas of Gibbston Character zoning - between SH6 and the Kawarau River and on the flats south of the Queenstown Lakes District (QLD) landfill, as well as Rural zoned land.

The Kawarau River ONF passes from west to east through the <u>Victoria Flats</u> PA. <u>The PA boundaries include those</u> that follow the topographical edges of the Kawarau Riverine system (refer PA ONF Kawarau River) which separate the upper extent of the river gorge with adjacent land of a flatter and distinctly different character.

There are two sub-areas: the flat fluvioglacial outwash terrace (the Victoria 'Flats'); and the river gorge and steep surrounding mountain slopes and knolls.

Physical Attributes and Values

Geology and Geomorphology • Topography and Landforms • Climate and Soils • Hydrology • Vegetation • Ecology • Settlement • Development and Land Use • Archaeology and Heritage • Mana whenua

Important landforms and land types:

- A small fluvioglacial terrace on the true right bank of the Kawarau River comprising slightly weathered outwash gravels and measuring approximately 2.2km long in an east-west direction and 1.6km wide in a north-south direction. It is bisected by the Gibbston – Cromwell Highway (SH6). Large boulders scattered across the flats, with a greater density close to Nevis Bluff, are thought to have been deposited by a debris flow from a landslide that dammed the river and formed a lake at the bluff.
- 2. The Kawarau River.
- Enclosing schist mountain slopes: including the eastern face of Mt Mason, the lower slopes of Mt Malcolm and the western escarpment of Waitiri Peninsula. Steep strongly eroded slopes with thin leached soils.
- 4. The upstream boundary of the PA is Nevis Bluff, formed from grey and greenschist. One of the best exposures of greenschist in New Zealand and a limburgite dike cutting the Haast schist. This landform is recognised in the NZ Geopreservation Inventory as having national significance.

Important hydrological features:

- Kawarau River, which passes through the Victoria Flats PA (refer PA ONF Kawarau River for landscape attributes and values).
- Water storage ponds <u>for</u> previous mining, or farm irrigation <u>and ponds constructed as part of the landfill</u> and <u>quarry activity</u>.
- 7. Irrigation water race from a spur of Mt Mason across the flats.

Commented [JH1]: Amendment by JHLA to improve the description of the PA.
Commented [JH2]: Amendment by JHLA to help balance out the description of land use activity.
Commented [JH3]: OS 132.9 Rock Supplies NZ Limited (although not submitted wording per se).
Commented [JH4]: OS 132.9 Rock Supplies NZ Limited (although not submitted wording per se)

Commented [JH5]: Amendment by JHLA to clarify. A flat area of terrain is <u>part of</u> the 'Victoria Flats' PA.

Commented [JH6]: Amendment by JHLA to make it clear that the Kawarau River PA is separate to the Victoria Flats PA.

Commented [JH7]: Amendment by JHLA as some water bodies are associated with these industrial activities.

Response to Submissions Version 11 August 2023

1

Important ecological features and vegetation types:

- Mainly unimproved pasture on the flats, with a high density of invasive species such as sweet briar, elderberry and broom. Screen planting of predominantly eucalypts around the QLDC landfill and an avenue of poplars on the access road.
- 9. Recent indigenous revegetation plantings at the Oxbow commercial recreation facility, the Wakatipu Gun Club and on the screening mounds for the quarry and processing yard north of SH6.
- 10. Rough pasture on the mountain slopes, with a high density of sweet briar and occasional matagouri on the shadier slopes and wetter toe slopes. Transition within the PA to very dry barren hillslopes in the eastern sector that support little vegetation other than thyme and sweet briar.
- 11. Flocks of black backed gulls are frequent, attracted by the QLDC landfill.
- 12. Animal pest species include rabbits, stoats, ferrets, rats and mice.

Important land use patterns and features:

- Mountain and hill slopes within the PA are undeveloped and have largely been retired from pastoral farming. <u>The Victoria fElats</u> themselves support several rural industrial, <u>residential</u> and commercial/community recreation activities, <u>which have reduced levels of naturalness to varying degrees</u> including:
 - a. The QLD solid waste facility, which dominates the flats, with the designated landfill buffer extending across the terrace from SH6 to the enclosing hillslopes and knolls. The presence of the landfill has influenced the nature of subsequent development, with no established rural living or viticulture, despite Gibbston Character zoning and some approved residential building platforms;
 - Quarry, gravel processing and cleanfill operation within the Gibbston Character Zone between SH6 and the river, screened from the road by planted mounds;
 - c. Commercial/community recreation facilities, including <u>but not limited to</u> the Wakatipu Clay Target. Club shooting range, the Oxbow Adventures Facility (jetboat sprinting, clay target shooting, off-road vehicles), and access to the Nevis bungy facility. Remnant tracks from previous off-road 4-wheel drive commercial recreation. Facilities include small buildings, parking areas and planted mounds that screen activities from SH6.
 - d. Consented residential / rural lifestyle building platforms, a distillery and other commercial operations exist on the terrace flats.
- The remaining areas of the 'flats' are used for low intensity grazing/baleage, with a few scattered sheds, or have been retired from productive use.
- 15. The Cromwell-Frankton A 110kV overhead transmission line that forms part of the National Grid Transpower high voltage transmission corridor along the southern periphery of the flats and over Mt Mason to the Gibbston Valley.

Important archaeological and heritage features and their locations:

- 16. History of 19th century and early 20th century gold mining along the Kawarau River, with numerous archaeological sites along the river's edge and frequent evidence of sluicing and tailings. Within the PA, sites include ferry crossings, the historic road formation across the flats, stone ruins, the sites of the Victoria Bridge Hotel (archaeological site F41/195) and Edward's Ferry Hotel (archaeological site F41/202), areas of sluicing and tailings and significant gold mining sites such as Doolan's Creek Tunnel (archaeological site F41/2080).
- 17. The supports of the Victoria Bridge over the Kawarau (constructed in 1874) are a QLDC Category 3 listed heritage feature (QLDC Ref. 223).

Response to Submissions Version 11 August 2023

Commented [JH8]: OS 70.33 Transpower NZ Ltd

-	Commented [JH9]: Amendment by JHLA to help with readability.
	Commented [JH10]: Amendment by JHLA to make it clear that it is the <u>flat</u> part of the PA being referred to.
١	Commented [JH11]: OS 132.12 Rock Supplies NZ Limited Ltd OS 133.33 The Station at Waitiri Ltd
١	Commented [JH12]: Amendment by JHLA to help with readability.
١	Commented [JH13]: OS 132.12 Rock Supplies NZ Limited (although not submitted wording per se).
١	Commented [JH14]: Amendment by JHLA to help with readability.

Commented [JH15]: OS 133.36 The Station at Waitiri Ltd (although
not submitted wording per se).

-	Commented [JH16]: OS 132.12 Rock Supplies NZ Limited (although not submitted wording per se).
-	Commented [JH17]: Amendment by JHLA to separate this part of the PA out.

Commented [JH18]: OS 70.34 Transpower NZ Ltd

Mana whenua features and their locations:

- 18. The entire area is ancestral land to Kāi Tahu whānui and, as such, all landscape is significant, given that whakapapa, whenua and wai are all intertwined in te ao Māori.
- The ONL overlaps the mapped wāhi tūpuna Kawarau River (refer PA ONF Kawarau River for landscape attributes and values).

Associative Attributes and Values

Mana whenua creation and origin traditions • Mana whenua associations and experience • Mana whenua metaphysical aspects such as mauri and wairua • Historic values • Shared and recognised values • Recreation and scenic values

Mana whenua associations and experience:

- 20. Kāi Tahu whakapapa connections to whenua and wai generate a kaitiaki duty to uphold the mauri of all important landscape areas.
- The Kawarau River was a traditional travel route that provided direct access between Whakatipu-waimaori- Waimāori (Lake Whakatipu) and Mata-au (the Clutha River).
- 22. The Kawarau is a significant kāika mahika kai where weka, kākāpō, kea and tuna (eel) were gathered.
- The mana whenua values associated with the ONL include, but may not be limited to, ara tawhito, mahika kai and nohoaka.

Important historic attributes and values:

- 24. The strong associations of the Kawarau River valley with 19th and early 20th century gold mining and early European settlement, with physical evidence of ferry sites, mining activities and associated settlement.
- Historic route between the Clutha River Mata-au and Whakatipu-Wai-MāoriWhakatipu-Waimāori (Lake Whakatipu).

Important shared and recognised attributes and values:

26. Shared and recognised values as part of the dry, barren and wild rural hinterland of the Kawarau valley downstream of Nevis Bluff, experienced by people travelling between Cromwell and the Whakatipu Basin on SH6.

Important recreation attributes and values:

- 27. Destination for commercial and community recreation activities.
- 28. Walking trail connecting Victoria Flats and Gibbston Valley over Mount Mason and Mount Rosa.

Commented [JH19]: OS 77.43 Kai Tahu ki Otago OS 188.43 Te Rūnunga o Ngāi Tahu

Commented [JH20]: OS 77.43 Kai Tahu ki Otago OS 188.43 Te Rūnunga o Ngāi Tahu

Commented [JH21]: Amendment by JHLA to make it clear that this is the main public route through the PA.

Perceptual (Sensory) Attributes and Values

Legibility and Expressiveness • Views to the area • Views from the area • Naturalness • Memorability • Transient values • Remoteness / Wildness • Aesthetic qualities and values

Legibility and expressiveness attributes and values:

- 29. Moderately legible glaciofluvial outwash terrace, partially modified by alluvial gold mining, landfill activities and screening mounds.
- 30. Legible evidence of an historic landslide near Nevis Bluff in the large boulders scattered across the flats.
- 31. Highly legible and expressive river gorge and highly legible processes of uplift and erosion in the open and craggy mountain slopes.

Particularly important views to and from the area:

- 32. Views from SH6 across the flats to the enclosing mountain ranges and hills. Little Some built development is evident in views, as the landfill and other activities on the flats are (or will be) largely screened by mounding and planting. From SH6, the flats appear relatively unkempt, with rough pasture and predominantly natural patterns of vegetation cover (mainly exotic sweet briar and elderberry). The flats have a more modified landscape character than the surrounding higher ground within the PA, where the flats and are dominated and strongly enclosed by the dry rugged slopes of the mountains. There is a strong contrast between the remote rough rural character of the flats and the viticultural landscape of the main Gibbston Valley west of Nevis Bluff.
- 33. Views from the Mt Rosa walking track as it ascends the hillslopes of Mt Mason take in the entire northern area of the flats, including the gravel processing facility within the Gibbston Character Zone, clay shooting range and Oxbow Adventures facility. The landfill is largely screened by planting or topography. The aesthetic coherence and perceived naturalness of the flats is undermined by the spread of rural industrial and recreational activities, but the surrounding mountains remain dominant in the views.

Naturalness attributes and values:

- 34. Despite modified vegetation cover, weed infestation and farm tracks, the mountain slopes and knolls around the flats retain a high level of naturalness.
- 35. Within the Victoria Flats PA, the smaller 'terrace flats' area wider ONL, the small landscape unit of the Victoria Flats has been substantially modified and now retains only a low-moderate level of naturalness. The SH6 corridor contributes to this. However the level of naturalness perceived from SH6 remains relatively high, as most existing and consented, but as yet unbuilt activities are/will be largely screened from road view.as most activities are effectively screened.

Memorability attributes and values:

36. Forms part of a highly memorable journey through the barren, sere and strongly enclosed landscape of the Kawarau Gorge, downstream of Nevis Bluff. The wildness and inhospitable nature of the gorge add to its memorability.

Transient attributes and values:

37. Changing colours of pasture across the seasons, spring flowering of sweet briar and elderberry, and the play of light and shadow on the craggy mountain slopes.

Commented [JH22]: OS 132.15 Rock Supplies NZ Limited (although not submitted wording per se). OS 133.40 The Station at Waitiri Limited (although not submitted wording per se)

Commented [JH23]: OS 132.15 Rock Supplies NZ Limited although ed wording per s OS 133.40 The Station at Waitiri Limited (although not submitted wording per

se). OS 133.47 The Station at Waitiri Limited (although not submitted wording per

Commented [JH24]: OS 132.15 Rock Supplies NZ Limited although not submitted wording per se. OS 133.40 The Station at Waitiri Limited (although not submitted wording per

Commented [JH25]: OS 132.15 Rock Supplies NZ Limited although not submitted wording per se. OS 133.40 The Station at Waitiri Limited (although not submitted wording per

Commented [JH26]: OS 133.040 The Station at Waitiri Ltd

Commented [JH27]: Amendment by JHLA to make it clear that the 'flats' is a 'sub area' within the broader PA which includes mountains.

Commented [JH28]: Amendment by JHLA.

Commented [JH29]: Point added by JHLA to better acknowledge the state highway's presence

Commented [JH30]: OS 133.43 The Station at Waitiri Ltd although not submitted wording per se

Remoteness and wildness attributes and values:

38. A sense of relative remoteness and wildness, particularly in contrast with the viticultural landscape of the Gibbston Valley to the west.

Aesthetic attributes and values:

- The experience of the attributes identified above by a significant number of residents and visitors travelling on SH6.
- 40. More specifically, this includes:
 - a. The strong sense of enclosure by steep dry eroding mountain slopes.
 - b. The sense of relative remoteness and wildness, and the contrast with the more tamed and inhabited Gibbston Valley.
 - c. The relatively high level of naturalness perceived from the highway SH6, with most development effectively screened by mounding and/or planting and including natural and modified introduced patterns of vegetation spread cover (albeit largely exotic weeds) apparent.

Summary of Landscape Values

Physical • Associative • Perceptual (Sensory)

Rating scale: seven-point scale ranging from Very Low to Very High.

Very low	low	low-mod	moderate	mod-high	high	very high

The physical, associative and perceptual attributes and values described above for PA ONL Victoria Flats:

- (a) Moderate-high physical values relating to the river and its escarpments, the unmodified uplifted mountain ranges, and the mana whenua features associated with the area.
- (b) Moderate associative values relating to the mana whenua associations of the area, the historic attributes of the river and flats and the shared and recognised values as part of dry rural hinterland of the Kawarau valley downstream of Nevis Bluff.

(c) Moderate-high perceptual values relating to:

- i. The legibility and expressiveness attributes of the river gorge and mountain slopes.
- ii. The aesthetic and memorability values of the area due to its strong enclosure by dramatic eroded mountain ranges, its dryness, barrenness and relative wildness and remoteness.
- iii. A relatively high impression of naturalness arising from the dominance of the more natural landscape over visible built development.
- (d) Low-moderate physical, associative and perceptual values associated with the more modified parts of the terrace flats, typically where roading, buildings, guarrying activities and the landfill are located.

Commented [JH35]: OS 132.23 Rock Supplies NZ Ltd (although not submitted wording per se). OS 133.50 The Station at Waitiri Ltd (although not submitted wording per se). OS 133.51 The Station at Waitiri Ltd (although not submitted wording per

Commented [JH31]: Amendment by JHLA to make it clear it is SH6

Commented [JH32]: OS 133.49 The Station at Waitiri Ltd (although

Commented [JH33]: OS 133.49 The Station at Waitiri Ltd (although

Commented [JH34]: OS 133.49 The Station at Waitiri Ltd (although

being referred to

not submitted wording per se).

not submitted wording per se).

not wording submitted per se).

se).

Landscape Capacity

The landscape capacity of the PA ONL Victoria Flats for a range of activities is set out below.

- i. Commercial recreational activities some landscape capacity for small scale and low-key activities that are set back from SH6; integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; enhance public access (where appropriate); and protect the area's ONL values.
- iii. Visitor accommodation and tourism related activities very limited to no landscape capacity for visitor accommodation on the terrace flats south of SH6 where such development can be screened when viewed from SH6, is of an appropriate scale and character, will integrate with and complement/enhance existing development and will not compromise the identified landscape values in the broader context. No landscape capacity for tourism-related activities.
- iii. Urban expansions no landscape capacity.
- Intensive agriculture some landscape capacity on the <u>terrace</u> flats for intensive agriculture that maintains views to the surrounding mountains from SH6.
- Earthworks limited landscape capacity for earthworks and trails that protect historic, naturalness and expressiveness attributes and values, and are sympathetically designed to integrate with existing natural landform patterns.
- vi. Farm buildings limited landscape capacity for modestly scaled buildings that reinforce existing rural character.
- vii. **Mineral extraction some** landscape capacity for extraction that is screened from SH6 by landform and/or vegetation and is remediated to enhance the naturalness and aesthetic values of the ONL.
- viii. Transport infrastructure limited landscape capacity for modestly scaled and low key 'rural' roading on the flats.
- ix. Utilities and regionally significant infrastructure some landscape capacity for infrastructure that is co-located with existing facilities and is designed to minimise visual prominence from SH6. In the case of the National Grid limited landscape capacity for the upgrade of existing infrastructure within the same corridor and in circumstances where there is a functional or operational need for the particular location and structures are designed and located to limit their visual prominence from SH6, including associated earthworks.
- x. Renewable energy generation limited landscape capacity for discreetly located and small-scale renewable energy generation. Very limited landscape capacity for commercial-scale renewable energy generation that is screened from SH6 and protects the area's ONL values.
- xi. Production <u>Forestry</u> very limited landscape capacity for small scale production forestry on the flats that maintains views to the surrounding mountains from SH6.
- xii. Rural living no landscape capacity within the Rural-zoned PA ONL. Some landscape capacity for rural living development within the areas of Gibbston Character Zone on the Victoria fFlats. Rural living development is constrained by the presence of the QLD solid waste facility.

Commented [JH36]: OS 77.5 Kai Tahu ki Otago

Commented [JH37]: OS 74.2 John May and Longview Environmental Trust Commented [JH38]: OS 132.25 Rock Supplies NZ Ltd (although not submitted capacity sought).

submitted capacity sought). OS 129.8 Gibbston Highway Limited (although not submitted capacity sought).

OS 133.53 The Station at Waitiri Ltd (although not submitted wording per se).

Commented [JH39]: OS 132.25 Rock Supplies NZ Ltd although not submitted wording per se.

Commented [JH40]: Amendment by JHLA to make it clear that it is the <u>flat</u> part of the PA being referred to.

Commented [JH41]: OS 70.35 Transpower NZ Ltd

Commented [JH42]: OS 74.2 John May and Longview Environmental Trust Commented [JH43]: Typographical correction.

Commented [JH44]: Amendment by JHLA for consistency of 'flats' sub-area terminology.

6

Response to Submissions Version 11 August 2023

21.22.17 Victoria Flats ONL Schedule

11 AUGUST 2023 FINAL

Blue highlighted text: captured in "Response to Submissions (version of) 21.22.17 Victoria Flats ONL Schedule". New text to be underlined with black line, deleted text to be strike through.

Red text relates to a submission point that has not been specifically captured in the "Response to Submissions (version of) 21.22.17 Victoria Flats ONL". This is typically because the submission point is general rather than confined to specific text amendments. Two examples identified.

Green wash line: Submission point re-notified 22 June 2023.

Submissions Summary: Landscape Comments

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 10.1	Robert Yang	Support	That landscape schedule 21.22.17 be retained as notified.	In agreement, no comment required other than to note the Schedule 21.22.17 text changes recommended in Response to Submissions Version of Schedule 21.22.17 (July 2023).	Accept submission in part.
OS 29.2	Ken MacKenzie	Oppose	That a higher landscape value be given to Gibbston, from Gibbston Valley Winery to the Nevis, Gibbston Back Road.	The area that the submitter describes is not within the Victoria Flats PA although it is within the wider area. The schedules don't solely describe the landscape within the PA itself and while the schedules may mention the contextual landscape, the landscape values of such areas beyond the PA are typically not addressed in order to keep the schedules concise.	Reject submission.
OS 70.33	Ainsley McLeod on behalf of Transpower New Zealand Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include the word 'Important' with the words 'land-use patterns and features'.	This is a typographical error. All PAs will be consequently amended to read ' Important Land use patterns and features:'	Accept submission.
OS 70.34	Ainsley McLeod on behalf of Transpower New Zealand Limited	Oppose	That the landscape schedule 21.22.17 is amended at point 15 to replace the words 'Transpower high voltage transmission corridor' with 'The Cromwell-Frankton A 110kV overhead transmission line that forms part of the National Grid'.	I recommend the following wording change to the schedule: [15] <u>The Cromwell-Frankton A 110kV overhead transmission line that</u> forms part of the National Grid <u>Transpower high-voltage transmission</u> corridor along the southern periphery of the flats and over Mt Mason to the Gibbston Valley.	Accept submission.
OS 70.35	Ainsley McLeod on behalf of Transpower New Zealand Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended in its landscape capacity assessment point ix utilities and regionally significant infrastructure to include, 'In the case of the National Grid there is landscape capacity for the upgrade of existing infrastructure within the same corridor and limited landscape capacity in circumstances where there is a functional or operational need for the particular location and structures are designed and located to limit their visual prominence, including associated earthworks'.	I consider that the following amendments to Schedule 21.22.17 Capacity are appropriate: ix Utilities and regionally significant infrastructure – some landscape capacity for infrastructure that is collocated with existing facilities and is designed to minimise visual prominence from SH6. In the case of the National Grid limited landscape capacity for the upgrade of existing infrastructure within the same corridor and in circumstances where there is a functional or operational need for the particular location and structures are designed and located to limit their visual prominence from SH6, including associated earthworks.	Accept submission.
OS 77.43	Michael Bathgate on behalf of Kai Tahu ki Otago	Oppose	That landscape schedule 21.22.17 Victoria Flats paragraphs 21 and 25 be amended to correct the spelling from Lake Wakatipu to Whakatipu Waimāori.	Amend spelling.	Accept submission.
OS 94.3	Brett Giddens on behalf of Cardrona Cattle Company Ltd	Oppose	That 21.22.17 be rejected.	Addressed by the reporting planner in the s42A Report	N/A
OS 94.4	Brett Giddens on behalf of Cardrona Cattle Company Ltd	Oppose	That the Gibbston Character Zone be excluded from the variation.	No technical evidence is provided in support of this submission point. The spatial extent of the Priority Area ONF/L mapping has been confirmed by the Environment Court (Topic 2 Decisions) and ONF/L mapping amendments (of the nature requested by the submitter) are beyond the scope of the Variation. The PAs capture Non-Rural Zone land, but do not apply to those zones.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
DS 94.5	Brett Giddens on behalf of Cardrona Cattle Company Ltd	Oppose	That the Victoria Flats Priority Area be removed from the submitter's property, including land zoned Gibbston Character Zone (or any future zone that may arise from appeals).	Addressed in response to OS 94.4.	Reject submission.
OS 94.6	Brett Giddens on behalf of Cardrona Cattle Company	Oppose	That the extent of the Victoria Flats Priority Area is clarified in relation to the Outstanding Natural Landscape boundary.	The spatial extent of the Priority Area ONF/L mapping has been confirmed by the Environment Court (Topic 2 Decisions).	N/A
	Ltd			PA boundaries align with or fall inside the notified Landscape Classification line in the PDP.	
				Addressed by reporting planner in the s42A Report.	
OS 94.7	Brett Giddens on behalf of Cardrona Cattle Company	Oppose	That the values and attributes in the 21.22.17 are updated to reflect that the flats can absorb development.	No technical evidence is provided in support of this submission point. Any 'updates' are non-specific.	Reject submission.
	Ltd			In my opinion the values and attributes outlined throughout the schedule under the separate headings accurately describe the character of the Victoria 'flats area' (comprising the flat terrace tops - not to be confused with the wider 'Victoria Flats' PA as it is named).	
				Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that these ratings are appropriate from a landscape perspective within the PA.	
				While there may be locations within the PA (on the flats in particular) where activities might be appropriate at varying levels of capacity, that would need to be determined through a site specific landscape assessment (as signalled in the Response to Submissions Version of the Preamble to Schedule 21.22).	
OS 129.1	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is rejected as notified or amended to address that it fails to recognise the extent and scale of existing permitted and consented activities being undertaken in the wider area and the effects these activities have on the landscape.	No technical evidence is provided in support of this submission point. 'Wider area' is non-specific. The focus of the PA schedules is to identify the existing landscape values that need to be protected while providing an indication of the landscape capacity of the PA for a range of land use activities. The PA schedules account for existing land use activity, permitted activity, and consented but unbuilt development within the PA and the effects these activities have on the landscape.	Reject submission.
				Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that the schedule wording is appropriate.	
OS 129.2	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to clarify the circumstances in which applicants, Council planners, landscape architects, decision-makers and others involved in Resource Management Act processes on consent applications will utilise the information in the landscape schedules.	Addressed by the reporting planner in the s42A Report	N/A
OS 129.3	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to clarify in what instances plan users will refer to the Chapter 3 provisions and utilise these landscape schedules.	Addressed by the reporting planner in the s42A Report	N/A
OS 129.4	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to clarify whether an application seeking consent under a district wide rule only will be required to address the matters in the landscape schedules.	application seeking consent under a district wide rule	
OS 129.5	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to remove archaeological / historic heritage and mana whenua features / associations from the values of the landscape schedule.	No technical evidence is provided in support of this submission point. The notified version of Schedule 21.22.17 was reviewed by cultural and heritage experts with those experts supporting the text in this regard.	Reject submission.
				As such the changes to the schedule as submitted are not supported.	

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 129.6	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to remove the capacity rating of 'no capacity' as the individual sites within the priority area have not been examined in detail.	No technical evidence is provided in support of this submission point. The PA assessment has been carried out at a PA wide scale. The methodology underpinning this is explained further in the EiC of Ms Gilbert. Refer also to response to OS 94.7 above. Relying on my knowledge of the area (including fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that the relevant 'no' capacity ratings are appropriate for this PA from a landscape perspective. The Response to Submissions Version of the Schedule 21.22 Preamble explains that the landscape attributes and values identified, relate to the priority area as a whole and should not be taken as prescribing the attributes and values of specific sites. A finer grained location-specific assessment of landscape attributes and values would be required for any plan change or resource consent. Other landscape values may be identified through these finer grained assessment processes.	Reject submission.
OS 129.7	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to confirm the extent of the capacity rating scale within the landscape schedules themselves.	Addressed by the reporting planner in the S42A Report.	N/A
OS 129.8	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the capacity of visitor accommodation and tourism related activities from 'no capacity' to limited landscape capacity', and to include the words 'for activities that are set back from SH6, integrate with and complement / enhance existing features and are located to optimise the screening and/or camouflaging benefit of natural landscape elements'.	No technical evidence is provided in support of this submission point. Also note increase in capacity for visitor accommodation from 'no' capacity to 'very limited to no' landscape capacity for visitor accommodation <i>"on the flats south of SH6 where such development can be screened from SH6 views, is of an appropriate scale and character, will integrate with and complement / enhance existing development and will not compromise the identified landscape values in the broader context." This is in response to OS 132.25 and recommended in the Response to Submissions Version of Schedule 21.22.17 (July 2023).</i> Relying on my knowledge of the area (including fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that tourism related activity (resorts) at a 'limited' level of capacity would not adequately protect the landscape values of the PA.	Accept submission in part.
OS 129.9	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include the words 'or where these are necessary to provide for roading, infrastructure or utilities' into the landscape capacity for earthworks section of the landscape schedule.	No technical evidence is provided in support of this submission point. Roading is provided for at (viii) 'limited capacity'. Infrastructure or utilities is provided for at (ix) 'some' capacity. Earthworks (v) has a 'limited' capacity. Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that these ratings are appropriate from a landscape perspective within the PA.	Reject submission.
OS 129.10	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include the words 'or larger scale roading where necessary for regional connectivity' in the landscape capacity for transport infrastructure in the landscape schedule.	No technical evidence is provided in support of this submission point. I take 'larger scale roading where necessary for regional connectivity' to mean SH6. As such, state highways fall under the definition of 'regionally significant infrastructure' in the District Plan. In the schedule, regionally significant infrastructure has a capacity rating of 'some', which, relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery) I consider to be appropriate.	Reject submission.
OS 129.11	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to replace the word 'and' with 'or replaces existing infrastructure (including	No technical evidence is provided in support of this submission point. The replacement of existing infrastructure including roading within the same footprint would likely be a permitted activity.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
			roading), or' into the landscape capacity for utilities and regionally significant infrastructure section of the landscape schedule.	As such the submitted changes to the wording is not considered to be necessary.	
OS 129.12	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	 That the landscape schedule 21.22.17 Victoria Flats is amended to acknowledge that some activity terms (such as intensive agriculture) are a direct response to the Chapter 3 provisions that also use these terms. Any additional activities referred to in the landscape schedules, particularly those in the landscape capacity assessment should utilise defined terms. 		N/A
OS 129.13	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That alternatively to the relief sought in this submission additional or consequential relief necessary or appropriate to address the matters raised in this submission and/or the relief requested in this submission, including any such other combination of plan provisions, objectives, policies, rules and standards provided that the intent of this submission is enabled.	Addressed by the reporting planner in the S42A Report.	N/A
OS 129.14	Maddy Familton on behalf of Gibbston Highway Limited	Oppose	That if the relief sought in this submission is not granted that the landscape schedules are rejected and withdrawn.	Addressed by the reporting planner in the S42A Report.	N/A
OS 132.4	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That landscape schedule 21.22.17 be amended so that visibility in the schedule to and across the submitters site (State Highway 6, Gibbston Valley, east of Nevis Bluff -Part Lot 3 DP 27395) be limited to important public viewpoints.	Under 'Particularly important views to and from the area' in the schedule it includes "Views from SH6 across the flats to the enclosing mountain ranges and hills." Views from SH6 are therefore considered 'important'. The locations of any specific 'important public viewpoints' have not been provided by the submitter.	Reject submission.
			Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including aerial imagery), I consider that important public views are likely to be numerous and continuous from SH6. As such, it is of my opinion that 'important public viewpoints' would be best considered and identified as part of an assessment of any future land use consent or plan change applications.		
					It is also acknowledged that key public viewpoints will be mostly from SH6 subject to a constantly changing field of view and view direction often at open road speeds which may make a determination of key public viewpoints difficult.
OS 132.9	Rosie Hill on behalf of Rock Op Supplies NZ Limited	pplies NZ Limited the words: 'this area contains significant landscape modifications through consented and established activities such as residential development, major quarry and extraction operations, tourism activities, and associated landscaping, earthworks, and signage. These modified flats exhibit a character more closely aligned with a visual amenity landscape that an outstanding natural landscape' after the word landfill; and add the following at the end of the paragraph: 'The mapped PA ONF boundaries follow those topographical edges of the Kawarau Riverine system which demarcate the upper extent of the River gorge with adiacent land of a latter and different character'.	the words: 'this area contains significant landscape modifications through consented and established activities such as residential development, major quarry and extraction operations, tourism activities, and associated landscaping, earthworks, and signage. These	Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that the land use / landscape modifications to the Victoria Flats area have been appropriately acknowledged throughout the schedule.	Accept submission in part.
			The Kawarau River ONF passes from west to east through the Victoria Flats PA. The PA boundaries include those that follow the topographical edges of the Kawarau Riverine system which separate the upper extent of the river gorge with adjacent land of a flatter and distinctly different		
				It is also noted that the question as to whether part of the PA qualifies as an RMA s7 (visual amenity) landscape or feature is beyond the scope of the Variation and that the mapping of the District's ONF/Ls has been confirmed by the Environment Court (Topic 2 Decisions).	
OS 132.10	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That the Kawarau River as set out in paragraph 2 of Important landforms and land types in 21.22.17 be deleted.	The Kawarau River is a separate PA / ONF that overlaps the Victoria Flats ONL. As such the Kawarau River/gorge landform is also considered as part of the Victoria Flats PA when that PA is being described, although the Kawarau River ONF is subject to its own series of activities and capacity levels.	Reject submission.
OS 132.11	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That Important ecological features and vegetation types in 21.22.17 be amended at paragraph 7 to read: 'Mainly unimproved rank or degraded pasture on the flats, with a high density of invasive species such as	As such the submitted text change is not supported. No technical evidence is provided in support of this submission point.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments
			sweet briar, elderberry and broom. There is an opportunity to enhance these low biodiversity values through district plan provisions or other legal mechanisms, associated with subdivision and development proposals. The quarry site within the flats is devoid of ecological features or vegetation'; and amend paragraph 12 to read: 'Recognise the ability to effectively control animal pest species include rabbits, stoats, ferrets, rats and mice through district plan provisions or other legal mechanisms, associated with subdivision and development proposal'.	Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), in my opinion, i current wording at [8], [14], [37] and [38] adequately describes the current condition of the PA. No change is therefore considered necessary in my opinion. With respect to the suggestion that Schedule 21.22.17 should ide degradation and discuss the opportunities as to how such degrad may be remedied, this goes beyond the identification of the lands values of the PA and capacity ratings of the PA as a whole. In my opinion, such opportunities would be best addressed as part of a comprehensive and robust landscape assessment for a site-spec resource consent or plan change application. Further, the amendment sought to Schedule 21.22.17 to include reference to District Plan provisions / other legal mechanisms is r my view appropriate for inclusion into a Schedule of Values. This explained further in the Response to Submissions Version of the Schedule 21.22 Preamble.
OS 132.12	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 land use patterns and features be amended at paragraph 13 as follows: add lifestyle/residential activities associated with Victoria flats; amended clause a. through identifying Gibbston Character zoning as an exception zone and add the sentence ' The influence of associated amenity effects such as from dust, bird attraction, smell and noise, extend beyond the Site to other areas of the flats'; amended clause b. by adding Major before Quarry and add the words 'has significantly modified character of the flats' at the end of clause b.; add a new clause c. that reads ' Consented residential/lifestyle platforms exist adjacent to the quarry site as well as consented distillery and commercial operations.'; add a new clause d. that reads ' The above sites are subject to future rezoning proposals to create industrial/service zoning.'; and amend existing clause c. to clause e.	No technical evidence is provided in support of this submission per Relying on my knowledge of the area (including fieldwork), carefur review of GIS mapping resources (including contours, building platforms, aerial imagery and reading the decisions of several res- consent applications regarding development on the terrace flats), opinion the modified nature of the flats can be better acknowledge such, I recommend the following amendments: [13] Mountain and hill slopes within the PA are undeveloped and largely been retired from pastoral farming. The Victoria fFlats themselves support several rural industrial, residential and commercial/community recreation activities, which have reduced of naturalness to varying degrees including: And: [13c] Commercial/community recreation facilities, including but no limited to the Wakatipu Clay Target Club shooting range, the Oxb Adventures Facility (jetboat sprinting, clay target shooting, off-roa vehicles), and access to the Nevis bungy facility. Remnant tracks previous off-road 4-wheel drive commercial recreation. Facilities i small buildings, parking areas and planted mounds that screen act from SH6. [13d] (new point added) Consented residential / rural lifestyle buil platforms, a distillery and other commercial operations exist on the terrace flats. The other submitted points are considered to have been acknowl adequately elsewhere in the schedule at the appropriate PA level unnecessary or discuss effects, including effects outside a landso architect's expertise (birds, odour, noise). 'Major' regarding a qua descriptor is a subjective term.
OS 132.13	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Important shared and recognised attributes be amended to add an additional paragraph that reads: 'Access and recreation opportunities through improved cycle trail opportunities, and important service land for gravel extraction and future commercial/industrial zoned land'.	No technical evidence is provided in support of this submission provided in support of this submission provided at [27 - 28] in the schedule 'Important recreation attributes and values' which may give the submitter some comfort in this regard. Gravel extraction and commercial / industrial activities do not in n opinion contribute an 'important shared and recognised attribute a value' to an ONL. As such the submitted wording would be inappropriate to be incluted the schedule wording here.

	JH recommendation
ul	
the e	
entify dation scape y cific	
not in s is	
oint. ul	Accept submission in part.
source , in my jed. As	
have	
levels	
ot pow ad s from include ctivities	
Iding ne	
ledged I, are cape arry	
oint. under	Reject submission.
ny and	
uded in	

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 132.14	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Important recreation attributes and values be amended at paragraph 27 to add 'and aggregate supply' to the end of the sentence.	No technical evidence is provided in support of this submission point. Aggregate supply does not in my opinion contribute an 'important recreation attribute and value' to an ONL. As such, I consider the submitted wording would be inappropriate to be	Reject submission.
OS 132.15	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Particularly important views to and from the area at paragraph 32 be amended to read: 'Limited views from SH6 across the flats to the enclosing mountain ranges and hills due to the significant mounding and landscaping activities. Moderate built development is evident in the view, as the landfill, quarry, and other activities on the flats are (or will be) partly screened by mounding and planting. The flats appear relatively unkept and degraded with rough pasture and predominantly exotic patterns of vegetation spread (mainly sweet briar and elderberry) and are dominated and strongly enclosed by the dry rugged slopes of the mountains. There is a strong contrast between the rough rural, and modified character of the flats with viticulture / manicured landscapes of the main Gibbston Valley west of Nevis Bluff' and add the additional sentence: ' The Gibbston Character Zoning/proposed industrial rezoning of the area in the future'.	 included in the schedule wording here. No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I recommend the following changes to the schedule wording: [32] Views from SH6 across the flats to the enclosing mountain ranges and hills. LittleSome built development is evident in views, as the landfill and other activities on the flats are (or will be) largely screened by mounding and planting. From SH6 the flats appear relatively unkempt, with rough pasture and predominantly natural patterns of vegetation coverspread (mainly exotic sweet briar and elderberry). The flats have a more modified landscape character than the surrounding higher ground within the PA where the flats and are dominated and strongly enclosed by the dry rugged slopes of the mountains. There is a strong contrast between the remote rough rural character of the flats and the viticultural landscape of the main Gibbston Valley west of Nevis Bluff'. 	Accept submission in part.
OS 132.16	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Important views to and from the area at paragraph 33 be amended to add 'and residential and lifestyle development' after Oxbow Adventure facility at line 3 of the paragraph.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), while there are a small handful of dwellings including unbuilt consented platforms, in my opinion including 'residential and lifestyle development' is an overstatement. As such the submitted changes to [33] are not supported.	Reject submission.
OS 132.17	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Naturalness attributes and values at paragraph 34 be amended to add the sentence 'The flats themselves exhibit a very low naturalness value'.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), it is of my opinion that the flats and their landscape character, attributes and values have been adequately and accurately described in the Response to Submissions Version of Schedule 21.22.17 (July 2023), particularly at [32] and [35]. Also addressed in the response to OS 132.15.	Reject submission.
OS 132.18	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Naturalness attributes and values at paragraph 35 be amended to delete from low-moderate level of naturalness to low level of naturalness, delete however in the second sentence, delete the words 'remains relatively high, as most activities are effectively screened', and add the words: ' is largely influenced by mounding and landscaping activities. These sites have the potential for future development and enhancement of landscape values through subdivision and rezoning proposals.	No technical evidence is provided in support of this submission point. 'Sites' as mentioned in the submission is non-specific. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), it is of my opinion that the small flats area and their landscape character, attributes and values have been adequately and accurately described. The focus of the PA schedules is to identify existing landscape values that need to be protected. Future development may or may not protect landscape values. Therefore, the appropriateness or otherwise of such development change would be appropriately addressed via a comprehensive and robust landscape assessment, as signalled in the Preamble to the Schedule 21.22. Partly addressed in response to OS 132.17.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 132.19	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Memorability attributes and values paragraph 36 be deleted.	The PA methodology report explains that: "Landscape embodies the relationship between people and place: it includes the physical character of an area, how the area is experienced and perceived, and the meanings associated with it." As such, deletion of the memorability and attributes and values section as submitted would leave the schedule only partly described. The importance of a full and balanced description of the attributes and values of each PA is covered in the PA Methodology Report and in the EiC of Ms Gilbert.	Reject submission.
OS 132.20	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Transient attributes and values at paragraph 37 be amended to add an additional sentence that reads: 'However, this exotic vegetation exhibits very low biodiversity value, and the potential to enhance biodiversity through future subdivision and development is recognized.'	No technical evidence is provided in support of this submission point. Partly addressed in response to OS 132.11. As such the submitted changes to the wording are not supported.	Reject submission.
OS 132.21	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Remoteness and wildness attributes and values at paragraph 38 be amended to delete 'remoteness and wildness', and replace with 'industrial commercial, and degraded values'.	No technical evidence is provided in support of this submission point. Of note, [38] refers to the PA as a whole. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), in my opinion the industrial and commercial activity limited to a part of the flats area is reasonably well screened and as such is not considered sufficient enough to influence the levels of wildness and remoteness at a PA level from 'high' down to 'moderate'. To delete 'remoteness and wildness' and replace with what is sought would inaccurately describe the attributes and values of the PA as a whole. A large part of the PA includes attributes and values that provide a sense of remoteness and wildness, such as the surrounding highly natural mountain slopes. As such, the submitted text is not supported.	Reject submission.
OS 132.22	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Aesthetic attributes and values: Be amended at paragraph 40 to include the words 'although largely influenced by State Highway Landscaping'; Be amended at paragraph 41(b) so that it reads 'The sense of relative commercialization and industrial nature of the flats and the contrast with the more tamed and inhabited Gibbston Valley'; and Be amended at paragraph 41(c) so that it reads 'The relatively low level of naturalness perceived from the highway, with the most development effectively screened by mounding and/or planting, and modified patterns of vegetation (largely exotic weeds) apparent.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), in my opinion the state highway landscaping does not 'largely influence' aesthetic attributes and values which are chiefly derived from the surrounding higher ground, visible above and between such landscaping. The submitted changes to 41(b) are addressed in response to OS 132.21. Regarding the submitted changes to 41(c) and relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), in my opinion levels of naturalness perceived from the highway are relatively high, as stated in the schedule. This is chiefly derived from the surrounding higher ground, visible above and between such landscaping. Also addressed in response to OS133.49. As such, the submitted text is not supported.	Reject submission.
OS 132.23	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That 21.22.17 Summary of landscape values be amended to add a new clause (c) that reads: Very low - low physical and associative values associated with the more modified flats; and amend existing clause (c)iii. to read: relatively low impression of naturalness arising from the dominance of visible built development including significant state highway landscaping and mounding.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery) I recommend the following point is added to the Summary of Landscape Values: (d) Low-moderate physical, associative and perceptual values associated with the more modified parts of the flats typically where roading, buildings, quarrying activities and the landfill are located. Partly addressed in response to OS 132.21 above (regarding the submitted change to (c) iii).	Accept submission in part.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 132.24	Rosie Hill on behalf of Rock Supplies NZ Limited		amended from some to high landscape capacity, delete 'are setback from SH6', amend camouflaging to mitigation, add modified so that it is 'benefit of natural and modified landscape elements', amend from sympathetic scale to appropriate scale; delete the words 'and protect the area's ONL values' and replace with 'and reflect the areas values	No technical evidence is provided in support of this submission point. 'High' is not a listed capacity rating in the schedules and methodology. Section 3 of the PA Schedules Methodology Report explains the capacity rating scale (and noting that this explanatory detail is incorporated into the Response to Submissions Version of the Schedule 21.22 Preamble to assist plan users).	Reject submission.
			which exhibit a modified visual amenity landscape character.	Setback of development from SH6 is considered important to maintain ONL values and provide room for mounding/planting (the provision of natural landscape elements). 'Mitigate' assumes an adverse effect is being generated and as such is inappropriate wording to include in a schedule of values.	
				'Sympathetic' scale is synonymous with an 'appropriate' scale.	
				As such, the submitted text changes are not supported.	
				Of note, reference to 'protect ONF/L values' has been deleted from the PA Schedules in response to OS 74.2 as it is unnecessarily repetitive of the Chapter 3 policies which apply to ONF/Ls within the district.	
OS 132.25	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That landscape capacity 21.22.17.ii Visitor accommodation and tourism related activities be amended for no landscape capacity to high	No technical evidence is provided in support of this submission point. 'High' is not a listed capacity rating in the schedules and methodology.	Accept submission in part.
			landscape capacity, with addition of the words: 'for activities that integrate with and complement/enhance existing development'.	Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery) I consider that the following amendments to Schedule 21.22.17 Capacity are appropriate:	
				ii. 'Visitor accommodation and tourism related activities – very limited to no landscape capacity for visitor accommodation on the terrace flats south of SH6 where such development can be screened when viewed from SH6, is of an appropriate scale and character, will integrate with and complement/enhance existing development and will not compromise the identified landscape values in the broader context. No landscape capacity for tourism-related activities.	
OS 132.26	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That landscape capacity 21.22.17.iii Urban expansions be amended for no landscape capacity to moderate landscape capacity, with addition of the words: 'for activities that integrate with and complement/enhance existing development'.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I consider that the 'no' capacity ratings for urban expansion is appropriate from a landscape perspective within the PA.	Reject submission.
				Urban expansion within an ONL / PA would, in my view fail to protect landscape values, and in particular, perceptual, and associative values.	
OS 132.27	Rosie Hill on behalf of Rock			No technical evidence is provided in support of this submission point.	Reject submission.
	Supplies NZ Limited		limited to high landscape capacity, delete protect and change to provide for historic, naturalness and expressiveness attributes and	'High' is not a listed capacity rating in the schedules and methodology.	
		values, delete the word natural from existing landform pattern	values, delete the word natural from existing landform patterns, and add the words ' including mounding modifications to screen views from	Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery) in my opinion a capacity for earthworks greater than 'limited' would potentially undermine ONL values and is not supported.	
				The qualifiers under (v) are important to retain as they ensure that any future earthworks are appropriately designed in an ONL.	
				As such, the submitted text changes are not supported.	
OS 132.28	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That landscape capacity 21.22.17.vi Farm buildings be amended from limited to moderate landscape capacity.	No technical evidence is provided in support of this submission point. Regarding the submitters preferred use of the term 'Moderate': Section 3 of the PA Schedules Methodology Report explains the capacity rating scale (and noting that this explanatory detail is incorporated into the Response to Submissions Version of the Schedule 21.22 Preamble to assist plan users). The Methodology Report goes on to explain that 'moderate' is deliberately not a term used in the rating scale.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
				Relying on my knowledge of the area (including fieldwork), careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery) I consider that the capacity for farm buildings is appropriately rated at 'limited' given the level of existing and consented built development across the area.	
				Further, the Preamble to Schedule 21.22 explains that capacity ratings are assessed at a PA level and that site specific landscape assessments would be required as part of future resource consent or plan change applications that may identify varying landscape (values and) capacities, which may go some way to addressing the submitter's concerns in this regard.	
DS 132.29	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That landscape capacity 21.22.17.vii Mineral extraction be amended from some to high landscape capacity for mineral extraction, delete 'screens' and amend to 'mitigate views from SH6 by landform modification, and delete 'and is mitigated to enhance the naturalness and aesthetic values of the ONL'.	No technical evidence is provided in support of this submission point. 'High' is not a listed capacity rating in the schedules and methodology. The qualifiers under (v) are important to retain as they ensure that any future earthworks are appropriately designed in an ONL. As such, the submitted text changes are not supported.	Reject submission.
DS 132.43	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That the landscape capacity section for schedule 21.22.17 Victoria Flats and 21.22.9 Kawarau be deleted	Addressed by the reporting planner in the S42A Report.	N/A
OS 132.30	Rosie Hill on behalf of Rock Supplies NZ Limited	Oppose	That landscape capacity 21.22.17 be amended by adding an additional clause 21.22.17.viii Industrial zoning and development - high landscape capacity for future industrial zoning and development / service activities which reflect the need for such zoning supply across the District and provide for a coherent co-location with existing development in the area of the flats.	No technical evidence is provided in support of this submission point. Zone changes are beyond the scope of the Variation. Consideration of an activity not provided for in the District Plan and in turn, the PA schedules should be addressed via a site-specific plan change application.	Reject submission.
DS 133.2	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to remove the submitters land from the priority area.	No technical evidence is provided in support of this submission point. The spatial extent of the Priority Area ONF/L mapping has been confirmed by the Environment Court (Topic 2 Decisions) and ONF/L mapping amendments (of the nature requested by the submitter) are beyond the scope of the Variation.	Reject submission.
DS 133.4	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to recognise and provide for anticipated development appropriately.	The meaning of this submission point is unclear. No technical evidence is provided in support of this submission point. The PA Schedules have been drafted and amended (where appropriate) in response to submissions - acknowledging the scale and character of anticipated development under the District Plan. This has resulted in amendments to the capacity evaluation for some activities.	Reject submission.
DS 133.6	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to provide for the 'exception regime' provided for in the Gibbston Character Zone of the Proposed District Plan in the landscape schedule.	The PAs capture Non-Rural Zone land, but do not apply to those zones.	N/A
DS 133.9	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is opposed and should be rejected as notified as the site is significantly degraded and dominated by human modification.	No technical evidence is provided in support of this submission point. Also addressed in response to OS 132.9, OS 132.11, OS 132.17 and OS 132.18.	Reject submission.
DS 133.10	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is opposed and rejected as notified as the zoning of the site as Gibbston Character Zone historically under the Operative District Plan effectively provided for an exemption status to outstanding natural landscape classification and this should be formally recognised in the Proposed District Plan framework.	Addressed by the reporting planner in the S42A Report.	N/A
DS 133.12	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to provide for Gibbston Character Zone land as that of a visual amenity landscape (Section 7 landscape). The submitter seeks that this be recognised in the relevant schedules, and that those provide for appropriate future use and development.	Addressed in response to OS 132.9.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 133.13	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to recognise a range of consented activities in the priority area.	No technical evidence is provided in support of this submission point. The PA schedules account for existing land use activity, permitted activity, and consented but unbuilt development. Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including building platforms, resource consents and aerial imagery), I consider that the Response to Submissions Version of the Schedule 21.22 has adequately addressed the submitters concerns.	Accept submission.
OS 133.15	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to more accurately recognise and provide for existing uses, their likely and anticipated future upgrade, replacement or redevelopment.	No technical evidence is provided in support of this submission point. The focus of the PA schedules is to identify existing landscape values that need to be protected. Other than existing uses, what is sought does not form part of the identification of the landscape values of the PA and its capacity ratings. The 'replacement' or 'upgrade' of an existing activity may or may not protect landscape values. Therefore, the appropriateness or otherwise of such development change would be appropriately addressed via a comprehensive and robust landscape assessment, as signalled in the Preamble to the Schedule 21.22.	Reject submission.
OS 133.17	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to recognise and provide for benefits of change, enhancement, and remediation.	No technical evidence is provided in support of this submission point. The focus of the PA schedules is to identify existing landscape values that need to be protected. The reference to landscape restoration and enhancement in the discussion of landscape capacity for a range of landuses, signals the types of enhancement and remediation as part of development change that are likely to be appropriate within the ONF (noting that this is at a PA level, rather than a site-specific level). It is also expected that such matters would 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. However, positive change, enhancement and remediation is addressed in the Landscape Capacity section at (i), (ii), (v), (vi) and (vii).	Reject submission.
OS 133.19	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to identify degradation and opportunities to remedy identified degradation.	No technical evidence is provided in support of this submission point. With respect to the suggestion that the Schedule 21.22.17 should identify degradation and discuss the opportunities as to how such degradation may be remedied, this goes beyond the identification of the landscape values of the PA and capacity ratings of the PA as a whole. In my opinion, such opportunities would be best addressed as part of a comprehensive and robust landscape assessment for a site-specific resource consent or plan change application.	Reject submission.
OS 133.21	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Falls is amended so the terminology used is consistent with that used in Chapter 24 of the Proposed District Plan.	The submitter does not itemise which PA terminology they seek be consistent with the PDP. Addressed by the reporting planner in the S42A Report	N/A
OS 133.23	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to revise capacity ratings used in the priority area.	Submission point is not specific. However, any revisions to capacity ratings are addressed in some responses to OS 133.	Reject submission.
OS 133.25	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That any additional, amended, consequential, or further relief in respect of the landscape schedule 21.22.17 Victoria Flats reflects the intent of the matters raised in this submission.	Addressed by the reporting planner in the S42A Report	N/A
OS 133.27	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That if the mentioned amendments in this submission regarding landscape schedule 21.22.17 Victoria Flats are not included that the schedule is deleted or withdrawn from the variation to Chapter 21.	Addressed by the reporting planner in the S42A Report	N/A
OS 133.28	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include information in the General Description of the Area regarding	Addressed in response to OS 132.9 (RMA s6(b) landscape) and OS 94.6 (PA boundaries).	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
			landscape modifications through consented and established activities which exhibit a character more closely aligned with a visual amenity landscape and information about the priority areas boundaries.		
OS 133.29	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to remove mention of the Kawarau Gorge as an important landform and landtype.	Addressed in response to OS 132.10.	Reject submission.
OS 133.30	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 8 to include the words 'rank or degraded' regarding the pasture on the flats and to include the sentence 'There is an opportunity to enhance these low biodiversity values through district plan provisions or other legal mechanisms, associated with subdivision and development proposals'.	Addressed in response to OS 132.11.	Reject submission.
OS 133.31	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include a point that states 'The quarry site within the flats is devoid of ecological features and vegetation' under the section Important ecological features and vegetation types.	Addressed in response to OS 132.11.	Reject submission.
OS 133.32	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 12 to state 'Recognise the ability to effectively control animal pest species include rabbits, stoats, ferrets, rats and mice through district plan provisions or other legal mechanisms, associated with subdivision and development proposals'.	Addressed in response to OS 132.11.	Reject submission.
OS 133.33	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 13 to include the words 'lifestyle/residential' and 'including'.	Addressed in response to OS 132.12.	Accept submission in part.
OS 133.34	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 13 (a) to include the sentence 'The influence of associated amenity effects such as from dust, bird attraction, smell and noise, extend beyond the Site to other areas of the flats'.	Addressed in response to OS 132.12.	Reject submission.
OS 133.35	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 13 (b) to change the reference to the quarry to 'major quarry', and to include the words 'which is an exception zone, 'has significantly modified character of the flats'.	Addressed in response to OS 132.12.	Reject submission.
OS 133.36	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 13 to include the sentence 'Consented residential/lifestyle platforms exist adjacent to the quarry site as well as consented distillery and commercial operations' as point 13 (c).	Addressed in response to OS 132.12.	Accept submission in part.
OS 133.37	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 13 to include the sentence 'The above sites are subject to future rezoning proposals to create industrial/service zoning.	Addressed in response to OS 132.12.	Reject submission.
OS 133.38	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended under the title Important shared and recognised attributes and values to include the point 'Access and recreation opportunities through improved cycle trail opportunities, and important service land for gravel and future commercial/industrial zoned land'.	Addressed in response to OS 132.13.	Reject submission.
OS 133.39	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 27 to include the words 'and aggregate supply' regarding the destination for commercial and community recreation activities.	Addressed in response to OS 132.14.	Reject submission.
OS 133.40	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 32 to change the word 'views' with 'limited views', include the words 'due to significant mounding and landscaping activities', replace the word 'little' with 'moderate' regarding built development, to include reference to the quarry and how views are 'partly' screened, to include reference to the flats being 'degraded' and the pasture being 'exotic' rather than 'natural', include reference to the 'modified' and 'manicured' character of the flats. Also to include the sentence 'The Gibbston	Addressed in response to OS 132.15.	Accept submission in part.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
			Character Zone/proposed industrial rezoning of the flats is expected to change and develop character and values of the area in the future'.		
OS 133.41	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 33 to include reference to residential and lifestyle development in regard to views from Mount Rosa.	Addressed in response to OS 132.16.	Reject submission.
OS 133.42	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 34 to include reference to the flats exhibiting a 'very low naturalness level' themselves.	Addressed in response to OS 132.17.	Reject submission.
OS 133.43	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 35 to remove the words 'moderate' and 'however', and to replace the sentence 'remains relatively high, as most activities are effectively screened' with 'is largely influenced by mounding and landscaping activities. These sites have the potential for future development and enhancement of landscape values through submission and rezoning proposals'.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), I recommend the following amendments to the schedule wording: [35] Within the wider ONL, the small landscape unit of the Victoria Flats Victoria Flats PA, the smaller 'terrace flats' area has been substantially modified and now retains only a low-moderate level of naturalness. The SH6 corridor contributes to this. However, the level of naturalness perceived from SH6 remains relatively high, as most existing and consented but as yet unbuilt activities are/will be largely screened from road view.	Accept submission in part.
OS 133.44	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to remove point 36 from the landscape schedule.	Addressed in response to OS 132.19.	Reject submission.
OS 133.45	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 37 to include the sentence 'However, this exotic vegetation exhibits very low biodiversity value, and the potential to enhance biodiversity through future subdivision and development is recognized'.	No technical evidence is provided in support of this submission point. With respect to the suggestion that Schedule 21.22.17 should discuss potential improvements in biodiversity through development, this goes beyond the identification of the landscape values of the PA and capacity ratings of the PA as a whole. In my opinion, such opportunities would be best addressed as part of a comprehensive and robust landscape assessment for a site-specific resource consent or plan change application.	Reject submission.
OS 133.46	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to replace the words 'remoteness and wildness' with 'industrial, commercial, and degraded values'.	Addressed in response to OS 132.21.	Reject submission.
OS 133.47	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include reference to how the landscape is largely influenced by State Highway landscaping.	Addressed in response to OS 132.15.	Accept submission in part.
OS 133.48	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended at point 40 (b) to replace the words 'remoteness and wildness' with 'commercialization and industrial nature of the flats'.	Addressed in response to OS 132.21.	Reject submission.
OS 133.49	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the rating of the schedules naturalness from 'high' to 'low', change the word 'natural' to 'modified' and remove the word 'albeit'.	No technical evidence is provided in support of this submission point. Relying on my knowledge of the area (including through fieldwork) and careful review of GIS mapping resources (including contours, building platforms, resource consents and aerial imagery), the Victoria Flats PA includes the highly natural/largely unmodified surrounding hills and mountains, therefore a 'Low' naturalness rating is inappropriate in my opinion. Further, adding 'modified' here is unnecessary as [40c] includes the word 'development' which clearly indicates a modified setting. I recommend the following amendments to the schedule wording: [40c] The relatively high level of naturalness perceived from the highway SH6, with most development effectively screened by mounding and/or planting, andincluding natural and introducedmodified patterns of vegetation spreadcover (albeit largely exotic weeds) apparent.	Accept submission in part.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 133.50	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include a point under the summary of landscape values stating the 'very low-low' physical and associative values associated with the more modified flats.	Addressed in response to OS 132.23.	Accept submission in part.
OS 133.51	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the rating for the impression of naturalness from 'high to 'low', to remove the words 'of the more natural landscape cover', and to include the words 'including significant state highway landscaping and mounding'.	Addressed in response to OS 132.23.	Accept submission in part.
OS 133.52	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the landscape capacity for commercial recreational activities from 'some' to 'high', remove the reference to the set back from State Highway 6, replace the word 'camouflaging' with 'mitigation', include reference to the land being modified, changing the word 'sympathetic' with 'appropriate', and to replace the words 'and protect the area's ONL values' with 'and reflect the areas values which exhibit a modified visual amenity landscape character'.	Addressed in response to OS 132.24.	Reject submission.
OS 133.53	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the landscape capacity of visitor accommodation and tourism related activities from 'no' capacity to 'high' capacity and to include the words 'for activities that integrate with and complement/enhance existing recreation and tourism development'.	Addressed in response to OS 132.25.	Accept submission in part.
OS 133.54	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the landscape capacity of urban expansions from 'no' capacity to 'moderate', and to include the words 'for activities that integrate with and complement/enhance existing development'.	Addressed in response to OS 132.26.	Reject submission.
OS 133.55	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the landscape capacity for earthworks from 'limited' to 'high', replace the word 'protect' with 'provide for', remove the word 'natural', and include the words 'including mounding modifications to screen views from the State Highway'.	Addressed in response to OS 132.27.	Reject submission.
OS 133.56	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the landscape capacity for farm buildings from 'limited' to 'moderate'.	Addressed in response to OS 132.28.	Reject submission.
OS 133.57	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to change the landscape capacity for mineral extraction from 'some' to 'high', include the word 'mineral', replace the words 'is screened' with 'mitigates views', include the word 'modification', and remove the words 'and is remedied to enhance the naturalness and aesthetic values of the ONL'.	Addressed in response to OS 132.29.	Reject submission.
OS 133.58	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include a point for the landscape capacity for industrial zoning and development.	Addressed in response to OS 132.30.	Reject submission.
OS 133.69	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended so the schedule only describes values which contribute to a feature as being outstanding.	No technical evidence is provided in support of this submission point. The schedule describes the attributes and values, guided by the methodology in Te Tangi a te Manu relevant to a PA wide study area. This includes both positive and negative aspects. While negative aspects do not contribute to ONL values, their inclusion does not mean the landscape character and value of the ONL has reached a point where it can no longer be considered outstanding. In other words, it is the collective relationship of the identified attributes and values that ultimately results in the RMA s6(b) classification. This is addressed in more detail in the EiC of Ms Gilbert.	Reject submission.

Original Submission No	Submitter	Position	Summary	JH comments	JH recommendation
OS 133.71	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to either delete references of the removal or eradication pest flora and fauna species or amended them to align with the Proposed District Plans assessment matters which recognise the opportunity and benefit of legal mechanisms to achieve such outcomes.	Addressed in response to OS 132.11.	Reject submission.
OS 133.73	Rosie Hill on behalf of The Station at Waitiri Limited	Oppose	That the landscape schedule 21.22.17 Victoria Flats is amended to include the scale of potential developments in regard to the landscape capacity for different activities within the priority area.	No technical evidence is provided in support of this submission point. The Preamble to Schedule 21.22 explains that the capacity descriptions are based on the scale of the PA and should not be taken as prescribing the capacity of specific sites. Within the 12 land uses identified by the Court for consideration with respect to landscape capacity, there is a very large range of potential development scales and styles provided for. To provide a meaningful analysis for every potential land use typology and their respective range of scales within each PA Schedule would be onerous and make the schedules unnecessarily long. Further, the Preamble to Schedule 21.22 explains that site specific landscape assessments would be required as part of future resource consent or plan change applications that may identify varying landscape (values and) capacities, which may go some way to addressing the submitter's concerns in this regard.	Reject submission.
OS 188.43	Elisha Young-Ebert on behalf of Te Rūnunga o Ngāi Tahu	Oppose	That landscape schedule 21.22.17 Victoria Flats paragraphs 21 and 25 be amended to correct the spelling from Lake Wakatipu to Whakatipu Waimāori.	Addressed in response to OS 77.43.	Accept submission.