

Before the Hearing Panel

---

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

---

**Synopsis of legal submissions for Eric Hopgood on behalf of Hawthenden Limited**

28 August 2026

---

**Submitter's solicitors:**

Maree Baker-Galloway | Hannah Zydenbos  
Anderson Lloyd  
Level 2, 13 Camp Street, Queenstown 9300  
PO Box 201, Queenstown 9348  
p + 64 3 450 0700  
maree.baker-galloway@al.nz | hannah.zydenbos@al.nz

**anderson  
lloyd.**

## May it please the Panel

- 1 This synopsis of legal submissions is provided on behalf of Eric Hopgood (**Hawthenden**) (submitter #50) represented by Anderson Lloyd in relation to the variation to introduce landscape schedules 21.22 and 21.23 (**Schedules**) into Chapter 21 Rural Zone of the Queenstown Lakes Proposed District Plan (**PDP**) (**Variation**).
- 2 Hawthenden has landholdings legally described as Section 44 Block III Lower Wanaka SD, Section 27 Block III Lower Wanaka SD, Part Section 30 Block III Lower Wanaka SD (259A Studholme Road), Part Section 10 Block III Lower Wanaka SD (259 Studholme Road), Lot 3 DP 20199 (115 Studholme Road) and Lot 1 DP 300235.
- 3 Hawthenden has an interest in Schedule 21.23.7 Studholme Road and Schedule 21.23.8 River Bank Road:



*Figure 1 – Hawthenden Land (outlined in yellow) within Schedule 21.23.7 and 21.23.8 mapped area*

## Executive Summary

- 4 These legal submissions address the following issues:
  - (a) The schedules are inefficient and not needed;

- (b) The schedules are unfair;
  - (c) Lack of relevance under the new regime; and
  - (d) If not withdrawn, changes to drafting sought.
- 5 Counsel submits that the non-PA RCL Schedules are unnecessary, inefficient and not the most appropriate method for achieving the PDP objectives. Counsel seeks a recommendation from the Panel that they be deleted in their entirety.
- 6 In the alternative, if the Panel is minded to retain them, they should be substantially amended so that they;
- (a) operate only as contextual, high-level information that accurately reflects the range of landscape values and features within the given landscape;
  - (b) do not operate as de facto policy or assessment criteria;
  - (c) do not constrain ordinary rural production, farming activities, rural infrastructure and reasonable future land use in the Rural Zone.
- 7 The non-PA Schedules are unfair because:
- (a) They do not appropriately recognise existing productive rural use and modification; and
  - (b) Landowners bear the practical burden of correcting high-level schedule wording.

### **Relief sought**

- 8 The primary relief sought for the reasons set out in these submissions, is withdrawal of the Studholm Road Schedule 21.23.7.
- 9 However, if that relief is not granted, the submitter seeks drafting change to the schedule. The key themes discussed below, which reflect the points raised in the Hawthenden original submission demonstrate why the Appendix A amendments sought to Schedule 21.23.7 Studholm Road are both accurate and appropriate.

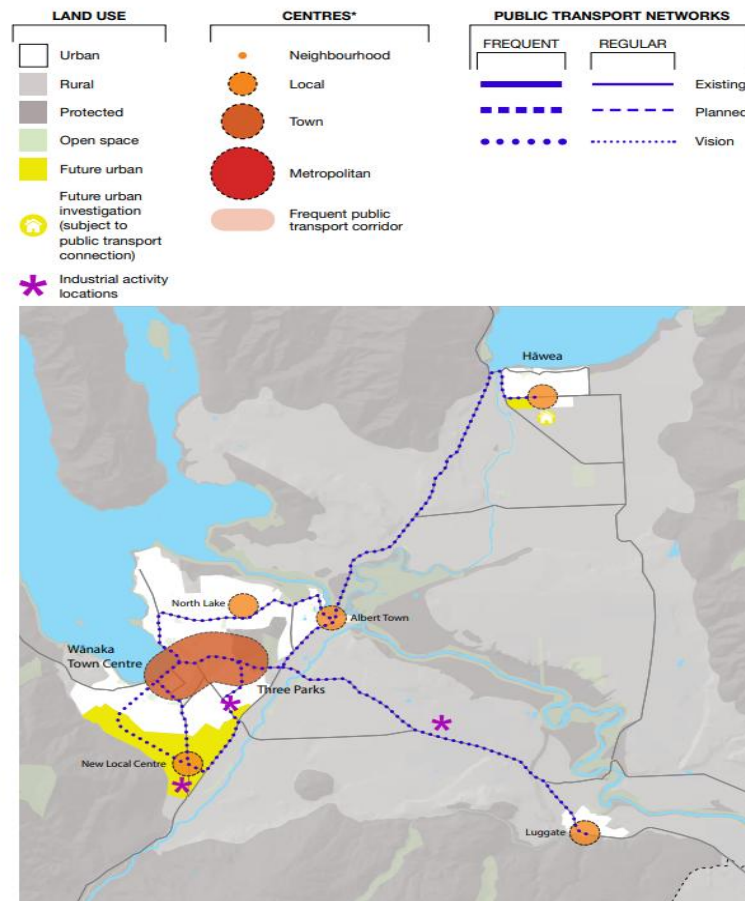
### *Key themes from Mr Hopgood's original submission*

- 10 **The Schedules do not adequately recognise the longstanding productive use of the Hawthenden Land:** The Hawthenden landholding has been actively and relatively intensively farmed for approximately 130

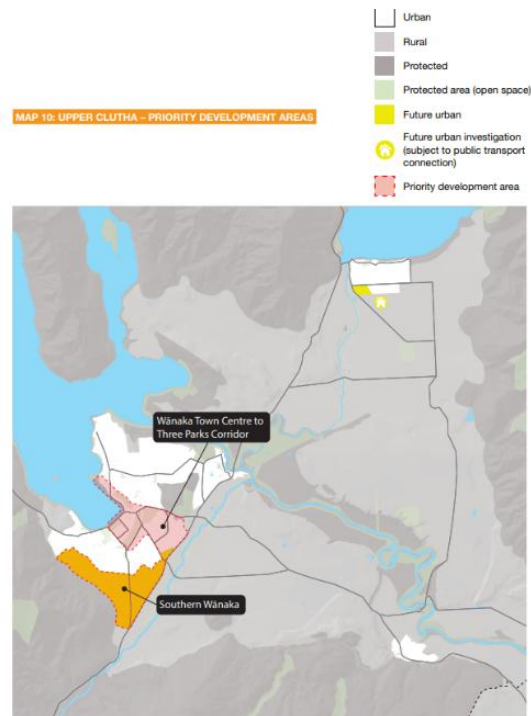
years. Counsel submits that the proposed landscape values fail to account adequately for that historic use and may inhibit the continuation of active or intensive agricultural activities that are currently permitted. This raises further concern of a reduced ability to obtain an appropriate economic return from the agricultural or agrarian use of the property. Counsel submits that this would amount to an unreasonable restriction to impose on rurally zoned land.

- 11 **The Schedules may restrict the reasonable use and development of the Hawthenden Land:** Counsel raises particular concerns about restrictions on rural living capacity and rural or residential development, both on the Hawthenden Land and on similar rural properties within the area.
- 12 **The Schedules may constrain farming activities and necessary rural infrastructure:** The proposed landscape values may inhibit or curtail farming activities and supporting rural development. In particular, as identified in the original Hawthenden submission, the potential effects on the erection of required farm buildings and the construction of necessary earthworks and farm tracks when these are given restrictive capacity ratings in the schedule.
- 13 As noted in the notified version of the Studholm Road Schedule, QLDC's **2021 Spatial Plan identifies** this area as a potential 'future urban' area, and therefore includes the highest capacity rating of 'some' for urban development.
- 14 Page 32 of the Spatial Plan sets out the spatial elements for the Upper Clutha including map 8 (copied below), which shows the Hawthenden land being located within the 'future urban' area, with the following statements that are of relevance:

"There is an opportunity for Wānaka to expand to the south-west, towards the Cardrona Valley, up to the area bound by the Outstanding Natural Landscape."



- 15 Map 10 (page 35) also identifies the land as a 'priority development area' within the Upper Clutha:



- 16 If this Schedule is to remain there should therefore be consistency throughout the capacity ratings for other built form development including rural living. These changes are reflected in the attached.

### **The schedules are inefficient and not needed**

- 17 Counsel submits that the non-Priority Area (PA) Schedules such as Studholm Road are not the most appropriate, efficient or effective method for achieving the objectives of the PDP. The issue is not whether the Upper Clutha contains important rural character landscapes, as it plainly does. The issue is whether the PDP requires, or is improved by, the addition of detailed schedules for non-PA areas.
- 18 In summary, Counsel submits that the non-PA Schedules are inefficient and unnecessary because:
- (a) There is no strategic direction for non-PA schedules;
  - (b) The existing PDP methodology already does the work;
  - (c) The schedules add a layer of limited utility rather than replacing assessment;

- (d) Their utility declines over time and creates an ongoing plan maintenance/review burden; and
- (e) They risk being applied as de facto policy.

*There is no strategic direction for non-PA schedules*

- 19 In setting out the background to the Variation, Council described the Environment Court's identified gap in the PDP's Stage 1 decision version because the relevant landscape values and capacity were not specified.<sup>1</sup> While the Court directed schedules to be prepared for Priority Areas (**PA**) to 'plug the gap', scheduling beyond the PAs was left to:<sup>2</sup>

QLDC's discretionary judgement as the planning authority.

- 20 This point was expressly recognised in expert conferencing. The experts agreed that:<sup>3</sup>

[10] unlike the PA schedules, there is no direction in the strategic objectives and policies to schedule non-PA areas in the PDP, and similarly, there is no direction in the objectives and policies to use such schedules for the purpose of undertaking a proposal-specific assessment.

- 21 That is a significant distinction. While the PA Schedules were prepared in response to express strategic policy direction, non-PA Schedules such as Studholm Road were not. While Council may consider them useful, utility is not the same as necessity, nor does it establish that they are the most appropriate, efficient or effective method under the PDP.

- 22 The same point was reinforced by the planning experts in conferencing. All planning experts, other than Ms Frew, agreed that:<sup>4</sup>

[14] if the non-PA schedules were intended to be included in the Plan, further amendments to the strategic objectives and policies would have been required to provide consistent and clear direction and to ensure that the non-PA schedules are effective.

- 23 Ms Gilbert's evidence explains that, for methodological consistency and transparency, the Upper Clutha Landscape Schedules were structured and

---

<sup>1</sup> Opening Legal Submission for Queenstown Lakes District Council, dated 19 August 2026, Appendix A, at [4 – 5].

<sup>2</sup> *Burdon v Queenstown Lakes District Council* [2026] NZEnvC 40. At [164].

<sup>3</sup> Outcome of Expert Landscape Architects and Planners Conference Held 6,8 & 9 July 2026.

<sup>4</sup> *Ibid.*

prepared in the same way as the existing PALS.<sup>5</sup> Consistency of format may be administratively convenient, but it does not answer the threshold question of whether non-PA schedules are required or efficient. Counsel submits that consistency with the PA Schedule format is not, of itself, a sufficient reason to schedule these non-PA landscapes and the need for them has not been sufficiently demonstrated by Council.

- 24 The Variation seeks to insert a detailed additional layer of landscape material into Chapter 21, but without the corresponding strategic policy architecture that would ordinarily explain why those schedules are required, how they are to be used, and what weight they are to be given. The experts also agreed that there is no scope within this Variation to alter the objectives and policies to provide that connection.<sup>6</sup> That leaves the non-PA Schedules as a significant planning instrument without any strategic support.

*The existing PDP methodology already does the work*

- 25 Counsel acknowledges that the absence of a specific policy direction does not, as a matter of jurisdiction, prevent the Council from notifying a variation of this kind. However, Counsel submits that the non-PA schedules are unnecessary, inefficient and inappropriate. The PDP does not leave these non-PA landscapes unregulated or unassessed, rather it contains a methodology for assessing them on a proposal-specific basis.<sup>7</sup>
- 26 That methodology provides for the relevant assessment to occur when a resource consent is applied for, using current site and proposal-specific information. In Counsel's submission, that is a more direct, accurate and efficient mechanism than relying on schedules that record values at a particular point in time and at a broad landscape scale.
- 27 Ms Frew's position is that assessment matter 21.21.2.1.a provides a pathway for Council to have regard to the values identified in Schedule 21.23 when undertaking a landscape assessment under SP 3.3.45.<sup>8</sup> That may be so if the schedules are included. But it does not answer the anterior question: whether the schedules are required at all when the PDP already contains a methodology for undertaking that assessment on a site specific, case by case basis when it is required. Further, the inability of this variation to amend chapter 3 to enable the PDP's higher order objectives and policies risks poor plan architecture as a result of this process. Counsel submits that

---

<sup>5</sup> Evidence in Chief of Bridget Gilbert on behalf of QLDC, dated 29 May 2026, at [4.14].

<sup>6</sup> Outcome of Expert Landscape Architects and Planners Conference Held 6,8 & 9 July 2026, at [17].

<sup>7</sup> This being the application of the Landscape Assessment Methodology in SP 3.3.45 and SP 3.3.46.

<sup>8</sup> Rebuttal evidence of Emily Clare Frew on behalf of QLDC, dated 12 August 2026, at [5.3].

the existing PDP framework is the more efficient method for non-PA landscapes because it requires assessment of the actual landscape values and capacity relevant to the site and proposal.

- 28 This is consistent with the concern of Mr Hopgood that the schedule does not accurately describe the character, values, modification and capacity of Hawthenden. The submitter's position is that the relevant land has a more modified rural character, different landform context, different existing use pattern, and different capacity profile than the schedule text suggests. Those are precisely the matters that are more appropriately assessed at the time of a resource consent, with current site-specific evidence, as the PDP currently provides for.

*The schedules add a layer rather than replacing assessment*

- 29 Ms Gilbert confirms that she did not visit private properties specifically in relation to this variation given that the schedules relate to geographically defined areas rather than specific sites.<sup>9</sup> She also explains that the non-PA Schedule areas are not landscapes in their own right and typically form part of broader landscapes.<sup>10</sup> The Preambles are therefore intended to make clear that a finer grained site-specific assessment will usually be required and may identify different attributes, values and capacity from those recorded in the schedules.
- 30 The inefficiency is therefore structural. The schedules do not replace the need for expert landscape assessment; they add a further layer to it. Applicants will still need to produce site-specific landscape evidence. Council will still need to assess proposals against the PDP objectives, policies, rules and assessment matters. Decision-makers will still need to determine the actual values and effects relevant to the site and proposal. The schedules will sit in the middle of that process as an additional reference point, but not one that is site-specific, determinative, or necessarily current.
- 31 While landscape schedules generally may provide efficiencies in some consent applications, Counsel submits that Council has not demonstrated that such benefits will apply to the non-PA Schedules and outweigh the countervailing costs. While Council's position is that these non-PA schedules will improve certainty for plan users, and reduce resource application consent costs,<sup>11</sup> we emphasize that this will only be true if the

---

<sup>9</sup> Ibid, at [1.15].

<sup>10</sup> Evidence in Chief of Bridget Gilbert on behalf of QLDC, dated 29 May 2026, at [4.13].

<sup>11</sup> Opening Legal Submission for Queenstown Lakes District Council, dated 19 August 2026, at [6.2].

schedules are sufficiently accurate and relevant to particular sites. In their current state, they are not.

*Their utility declines over time and creates an ongoing plan maintenance/review burden*

32 The experts agreed that:<sup>12</sup>

[20] ... the degree of utility may decline over time as the landscape changes, if the schedules are not periodically reviewed and updated. This observation equally applies to the PA Schedules and Schedule 24.8 (Wakatipu Basin Landscape Character Units).

33 This is a material efficiency concern which is particularly relevant for the non-PA schedules. Rural landscapes are dynamic; farming practices, shelterbelt patterns, irrigation, rural infrastructure, ecological restoration, pest management, recreational access and surrounding development may all change over time. If the schedules are not updated, they risk becoming increasingly inaccurate. If they are updated, that will require further plan variations, demanding Council resources, landowner participation, expert evidence and likely further litigation.

34 That concern was expressly identified in conferencing. The JWS records that Dan Curley, Scott Edgar and Morgan Shepherd considered that the possible requirement for further or rolling plan change processes, associated costs, and likely ongoing litigation to update the schedules may render their inclusion within the PDP less efficient than the existing framework for non-PA areas.<sup>13</sup> Counsel submits that this is a compelling reason to prefer the existing PDP approach. A proposal-specific assessment under SP 3.3.45 and SP 3.3.46 responds to the landscape as it exists at the time of the proposal. A static schedule does not.

35 The experts ultimately did not agree that the schedules would be efficient or effective:

[29] Although there was agreement that the schedules would assist in administration of the PDP, there was no agreement as to how effective and efficient this would be.

36 Counsel does not dispute that the schedules may have some administrative utility. However, a potential administrative benefit is not sufficient to justify an additional district plan layer which has no supporting strategic direction,

---

<sup>12</sup> Outcome of Expert Landscape Architects and Planners Conference Held 6,8 & 9 July 2026.

<sup>13</sup> Ibid, at [25].

no reduction in the need for site-specific assessment, and a real prospect of future maintenance costs and dispute.

*They risk being applied as de facto policy*

- 37 This concern was also identified in conferencing. Mr Skelton recorded, based on his experience with the existing PA Schedules, that:<sup>14</sup>

[24] ... they are often afforded greater weight than intended by the Preamble, and are frequently relied upon as policy or assessment criteria rather than as a high-level assessment tool to inform site-specific landscape assessment. He also considers that subjective terms such as "low key", "modestly scaled" and the capacity ratings can, in practice, disproportionately influence consent outcomes.

- 38 Ms Frew considers that the Preamble is sufficiently clear that capacity ratings and descriptions are not policies and are not a replacement for the PDP provisions.<sup>15</sup> Counsel submits that this does not fully answer the practical concern. The issue is not only what the Preamble says, but how the schedules are likely to be used. Once included in the PDP, the schedules will inevitably be cited in consent processes, and landowners will need to respond to them, council planners will report against them, submitters may treat them as benchmarks, and decision-makers may afford them weight even where site-specific evidence supports a different conclusion.
- 39 For these reasons, Counsel submits that the non-PA RCL Schedules are unnecessary, inefficient and not the most appropriate method for achieving the PDP objectives. Counsel seeks a recommendation from the Panel that they be deleted in their entirety.
- 40 In the alternative, if the Panel is minded to retain them, they should be substantially amended so that they;
- (a) operate only as contextual, high-level information that accurately reflects the range of landscape values and features within the given landscape;
  - (b) do not operate as de facto policy or assessment criteria;

---

<sup>14</sup> Ibid.

<sup>15</sup> Section 42A report of Emily Clare Frew on behalf of QLDC, dated 29 May 2026, at [12.6].

- (c) do not constrain ordinary rural production, farming activities, rural infrastructure and reasonable future land use in the Rural Zone.

### **The schedules are unfair**

41 Counsel submits that the non-PA Schedules are unfair because:

- (a) They do not appropriately recognise existing productive rural use and modification; and
- (b) Landowners bear the practical burden of correcting high-level schedule wording.

*They do not appropriately recognise existing productive rural use and modification*

- 42 Counsel accepts that the role of past and present farming practices is acknowledged to some degree in the Schedules. However, Counsel raises concern that this recognition is not carried through in a way that fairly reflects the working rural character of the Submitters' land, or the extent to which productive rural use, farm infrastructure and rural modification form part of the existing landscape.
- 43 Productive rural use should not be treated solely as an adverse modification to landscape character. In the Rural Zone, farming, rural infrastructure, shelterbelts, farm tracks, irrigation, farm buildings and other productive land use features are part of the existing environment and, in many cases, part of the landscape character that has developed over time.
- 44 The issue is not that farming activities should be exempt from landscape assessment where consent is required. Rather, the issue is that landowners should not be required to respond to schedule descriptions that do not fairly reflect the current productive rural baseline of their land. A fair assessment should start from the actual existing character of the land, not from broad landscape descriptions that may obscure important site-specific differences.
- 45 Counsel also submits that the Schedules tend to emphasise "natural" landscape values, which gives insufficient recognition to the extent to which human modification, productive rural use and rural activities form part of the existing landscape character. In Counsel's submission, it is unfair to identify and elevate selected natural or scenic values without giving equivalent recognition to the working rural context in which those values sit. That risks "cherry picking" the values to be recorded in the PDP, with the practical consequence that future land use and development may be assessed

against an incomplete description of the landscape. This is particularly problematic in the Rural Zone, where farming, rural infrastructure, earthworks, productive land use and associated change are ordinarily anticipated, subject to the relevant PDP provisions.

*Landowners bear the practical burden of correcting high-level schedule wording*

- 46 A further unfairness is that landowners may bear the practical and evidential burden of correcting, qualifying or distinguishing high-level schedule wording in later consent or plan processes. If a Schedule does not accurately describe a property, the landowner will likely need to obtain expert evidence to explain why the Schedule should not be applied literally to their land.
- 47 That burden is not displaced by the fact that the Schedules may be capable of being corrected through site-specific evidence. Counsel submits that this is itself part of the unfairness. Landowners should not have to incur additional cost and evidential burden to correct broad PDP wording that does not fairly reflect their land in the first place.

**Lack of relevance under the new regime**

- 48 The Planning Bill and Natural Environment Bill (collectively, the Bills) were reported back to the House by the Environment Select Committee on 20 July 2026. The Committee has recommended, by majority, that the Bills be passed, subject to amendments. The Bills passed their second reading on 4 August 2026 and have just finished at the Committee of the whole House stage. While the Bills remain proposed legislation and are not yet enacted, they are relevant to the Panel's consideration of the Variation because they identify the direction of travel for the replacement resource management system.
- 49 Of particular relevance to this Variation is the proposed treatment of landscape effects under the Planning Bill. Clause 14(1) of the Planning Bill, as recommended by the Select Committee, identifies effects of activities that would be "out of scope" and therefore not able to be considered under the Planning Bill framework. In respect of clause 14(1)(h), the Committee records that "the effect on landscape" would be an effect that must not be considered and recommends clarification that effects on landscapes and natural character must be disregarded where the landscape is not outstanding or the area is not of high natural character.
- 50 The Select Committee's recommended wording of clause 14 reinforces that the proposed Planning Bill framework is intended to materially narrow the range of visual, amenity and landscape effects capable of being considered

in land use planning. This is also reflected in the proposed transitional consenting framework, which seeks to amend s 104 of the RMA and provide for a number of 'out of scope' matters which will apply to consenting during the transitional phase.<sup>16</sup> These will commence 1 month after the Bills receive royal assent and include:

- (a) Internal and external building layouts; and
- (b) Views from private properties.

- 51 This proposed treatment of non-outstanding landscapes reinforces the concern already identified in these submissions that the non-PA RCL Schedules have limited ongoing utility.
- 52 That concern is strengthened by the fact that the existing PDP methodology already provides a more flexible bridge into the transitional period. As submitted above, SP 3.3.45 and SP 3.3.46 already provide a proposal-specific methodology for identifying and assessing landscape values and capacity in non-PA landscapes. That framework allows current site and proposal-specific evidence to be considered when a proposal is advanced. In a period of legislative transition, that flexibility is preferable to inserting detailed, static non-PA Schedules that are likely to require reconsideration or substantial amendment when the proposed regime takes full legal effect.
- 53 The additional layer created by the Schedules also sits uneasily with the direction of reform. The reform package is described as moving toward fewer effects being managed, fewer consents, fewer plans, more standardised planning instruments, and more proportionate conditions. This further reinforces the concern that it would be inefficient to insert a new and detailed non-PA landscape layer into the PDP
- 54 Although the proposed reform package does not yet have legal effect, and the Panel must determine the Variation under the current RMA framework, Counsel questions the merit of incorporating detailed and restrictive non-ONL landscape schedules into the PDP. The Select Committee's recommendations are a material contextual consideration when assessing the efficiency, fairness, and appropriateness of continuing to progress schedules that may become redundant, have limited practical planning utility, or require substantial reconsideration under the replacement regime.
- 55 Continuing this process risks requiring Council and submitters to incur significant time, cost and resources on schedules that may have limited or no future utility. That concern is particularly acute for rural landowners

---

<sup>16</sup> Section 104(1A), part 2, Schedule 11, Ibid.

whose participation in this process has been necessary to protect ordinary productive rural use, farming activities, rural infrastructure, and future land use flexibility.

- 56 The proposed regulatory relief framework under the replacement regime is also relevant. That framework would provide relief for landowners whose reasonable use of land is likely to be significantly impacted by specified rules in a plan.
- 57 It is acknowledged that the final form of the legislation remains uncertain and, accordingly, the regulatory relief framework should not be overstated. However, the framework still reinforces the need for caution before imposing restrictive landscape controls over private rural land. The proposed framework recognises, at least in principle, that where planning controls significantly affect the reasonable use of private land, landowners may be entitled to relief. That policy direction sits uneasily with the imposition of detailed non-ONL / RCL landscape schedules that constrain productive rural land use, while also potentially having limited ongoing function under the new planning framework.
- 58 For these reasons, Counsel seeks the withdrawal of the Upper Clutha schedules in their entirety.
- 59 In the alternative, the Panel should proceed with considerable caution before recommending their inclusion in the PDP. If the Panel is not prepared to recommend withdrawal, any retained schedules should be substantially amended so that they do not unnecessarily constrain ordinary rural production, farming activities, rural infrastructure, and future land use flexibility. This approach would better reflect the likely direction of the replacement planning framework and avoid further inefficient use of Council and submitter resources.

Dated this 28<sup>th</sup> day of August

Maree Baker-Galloway

Counsel for Eric Hopgood

## Appendix A

## 21.23.7 Studholme Road: Schedule of Landscape Values

### Key:

Normal text – notified version of Schedules

Black underline and ~~strikethrough~~ text – recommended amendments based on submissions, with submissions numbers referenced (May 2026)

Blue underline and ~~strikethrough~~ text – amendments that have been agreed in EWC (6-9 July 2026)

Red underline and ~~strikethrough~~ text – amendments recommended in EWC that have not been agreed (6-9 July 2026)

Purple underline and ~~strikethrough~~ text – recommended amendments made in Rebuttal Evidence (12 August 2026)

Green underline and ~~strikethrough~~ text – recommended amendments made for Eric Hopgood on behalf of Hawthenden Limited

### Application

Preamble 21.23, particularly clauses 3.1 – 3.3, explains that the application of the Schedule is to the Rural Zone only. The Assessment Extent for this Schedule includes areas of land that are zoned Rural.

### General Description of the Area

The Studholme Road area roughly corresponds to an irregularly shaped relatively small-scale pocket of elevated land on the southwestern edge of Wānaka (including a sliver of land sandwiched between the Alpha Range PA (ONL) and urban development on Heaton Park Drive). Urban residential land adjoins the north, northeast and western boundaries. Rural Lifestyle zoned land adjoins the eastern side. The south and western edge abuts the eastern edge of the upper Alpha Fan, which is part of the Mount Alpha PA (ONL).

### 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

### Landforms and land types

1. The surficial geology of the area includes both outwash gravels and glacial till from the glaciers that formed the Upper Clutha Basin and Lake Wānaka.
2. The sequence of landforms includes:
  - a. terrace and moraine landforms that were derived from glacial-fluvial action that truncated the large alluvial fan at the base of the Alpha Range (Alpha Fan);
  - b. alluvial fan associated with Stoney Creek; and
  - c. a series of gentle terrace risers and rolling slopes along the urban edge of the terrace/moraine that serve to differentiate the more elevated terrace and lower Alpha fan area (and coinciding with the Studholme Road area) from the Wānaka valley floor.

**Commented [BG1]:** Text amendment made to align with PALS text approach and improve clarity, in accordance with submission requests. For example, see OS29.4, OS30.9 and OS27.3

**Commented [AL2]:** The western boundary looks to abut residential/urban development (highlighted below). Suggest amending.



3. The relatively free-draining brown and pallic soils with reasonable fertility and largely gentle contour, **reflect support the current and historic** pastoral farming land uses in the area.

### Hydrological features

4. Stoney and Centre Creeks draining from the Alpha Range across the terrace to Lake Wānaka (Roys Bay). These creeks are ephemeral. Stoney Creek to the north, is the largest of the two and has been subject to significant flooding events in the past and natural hazard mitigation earthworks have been undertaken in the catchment. The alluvial fan of Stoney Creek is active and there is the potential that the path of the creek could alter in the future.
5. The Wānaka Basin Cardrona gravel aquifer which underlies the area and Wānaka township. Water take from the aquifer is currently over-allocated.

### Ecological features and vegetation types

6. Distinctive exotic vegetation types include:
  - a. Exotic shelterbelts (poplar, macrocarpa, Douglas fir, and pine) with scattered shade and exotic deciduous specimen trees (including walnuts and willows).
  - b. Exotic amenity plantings around rural dwellings, rural buildings, and along driveways.
  - c. Small areas of conifer woodlots on either side of Stoney Creek towards the northern end of the area.
  - d. Areas of semi-improved pasture and unimproved rank exotic grassland.
7. Scheduled *Sequoiadendron giganteum* (Giant Redwood) located towards the southern end of the area.
8. Rank exotic grassland may be utilised by skinks.

### Land use patterns and features

9. The majority of the area forms a small part of a much larger rural landholding (sheep and deer farming with some forestry) **being the Hawthenden Farm, which has been extensively farmed since approximately 1878.** The area is dominated by **working-land-use farming** with **only one smaller-scale rural living lots (approximately 0.6ha to 3ha)** evident. A cluster of rural cottages and buildings is located roughly in the centre of the area. All of the rural and rural living buildings are well integrated by mature plantings which limits their visibility from outside the area.

9A. [The area has been identified for urban expansion as future urban in the Queenstown Lakes QLDC 2024 Spatial Plan 2021.]

10. Neighbouring land uses which have an influence on the landscape character of the area due to their scale, character, and/or proximity include:
  - a. Urban Residential zoned land (and the Wānaka Urban Growth Boundary) and Rural Lifestyle zoning around the northwest, **west**, north, and east sides of the area. **The general absence of a strong natural landscape boundary along these edges makes the area vulnerable to development creep.**
  - b. The Mount Alpha PA (ONL) and working farmland on the fan at the base of the Alpha Range to the **west and south.**
  - c. **The area forms part of the 'greenbelt' swathe of pastoral farming framing the southwestern edge of Wānaka township and which reads as a sympathetic transition between the urban area and rugged mountains of the Alpha Range.**

**Commented [BG3]:** OS 30.15 Rosie Hill, Hawthenden Trust

**Commented [EF4]:** OS30.26, 30.12 - Deborah and Stephen Brent as trustees of the Hawthenden Trust

**Commented [AL5]:** This is a value judgement not a statement of character.

**Commented [AL6]:** To the west is urban development.

**Commented [AL7]:** Have already said it is farmland.

- d. The neighbouring Wānaka Top 10 Holiday Park offering an all year-round accommodation mix including cabins, family units, campervan sites and tent site.

### Archaeological and heritage features and their locations

11. Stone dairy building, circa 1890, at Hawthenden Farm.

### Mana whenua features and their locations

12. The entire area is ancestral land to many whānau within the iwi of Kāi Tahu whānui and, as such, all landscape is significant, given that whakapapa, whenua, and wai are all intertwined in te ao Māori.

#### 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

13. Kāi Tahu whakapapa connections to whenua and wai generate a kaitiaki duty to uphold the mauri of all important landscape areas.

### Historic attributes and values

14. The Studholme Road area ~~has significance in its representation of~~ is an example of the evolution of farming in the Wānaka Area. The area was initially part of the nucleus of the expansive Wanaka Station during the 1860s and 1870s, while later 19th century agriculture focused on more-intensive, smaller-scale sheep farming. This is a transition that is typical for most rural land in Central Otago and the Queenstown Lakes District.

Commented [BG8]: OS10.11 Michael Bathgate, Kai Tahu Ki Otago

### Shared and recognised attributes and values

15. ~~Valued as largely pleasant working farmland with limited rural living close to Wānaka, with a high level of visual and rural amenity.~~
16. The identity ~~of the area as a 'predominantly pastoral green belt' area~~ A farmed area on the south-western edge of Wānaka ~~providing a sympathetic transition to the vast Alpha Range~~ ONLY.

Commented [AL9]: No evidence that it is 'valued' as such - by who?

Commented [AL10]: Keep it factual.

#### Perceptual (Sensory) Attributes and Values

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

### Legibility and expressiveness attributes and values

17. The alluvial fan material from Mount Alpha, eroded by fluvial action from a more recent glacial advance along with part of the terminal moraine that encloses Wānaka are expressive of the glacial processes that have shaped the Wānaka Basin.

### Particularly important views to and from the area

18. The intermittent sequence of ~~attractive and~~ varied mid to longer-range views of parts of the area from Studholme Road (both ends), Mount Iron, Wānaka town centre, the eastern foreshore of Roys Bay and the adjacent eastern part of Wānaka. In these views the area reads as a ~~spacious~~ rural area adjacent to

Commented [AL11]: Is it 'attractive' if it is predominantly farmland?

urban Wānaka and backdropped by the proximate mountain context of the Alpha Range and the **farmed and modified** upper Alpha Fan. In the more distant views, the area forms part of the continuous patterning of elevated, gently sloping and irregularly shaped 'fan' of land and reads as an integrated part of the Alpha Range landform system.

### Naturalness attributes and values

19. Overall, there is a moderate-low level of **naturalness** with a predominance of natural, rather than built, elements; but **modification due to** human intervention as managed farmland and rural living is evident.

**Commented [AL12]:** It has been farmed and modified for over a century.

### Memorability attributes and values

20. ~~Memorable to visitors, residents and locals as~~ Part of the working rural backdrop to Wānaka ~~that functions as a greenbelt and spacious transition~~ between the urban area and mountains of the Alpha Range.

**Commented [AL13]:** No evidence from visitors, residents or locals that it is memorable.

### Transient attributes and values

21. Autumn leaf colour and seasonal loss of leaves associated with the exotic trees.
22. Seasonal pasture colours.
23. The changing shadow patterns from shelter belts and the presence of stock and wildlife such as hawks.

### Remoteness/wildness attributes and values

24. Rural tranquillity and quietness are currently experienced in parts of the area away from the urban edge where the levels of activity are consistent with 'working farmland'.

### Aesthetic attributes and values

25. The experience of all of the values identified above from public and private viewpoints.
26. More specifically, this includes:
  - a. ~~the highly attractive~~ views of the area, seen as part of a larger, working rural backdrop and transition between Wānaka and the Alpha Range;
  - b. ~~juxtaposition and contrast between the smooth and green 'tamed' appearance of the area and the upper Alpha Fan and the rougher, browner, and more visually complex rangelands of the upper Alpha Range; and~~
  - c. the distinctly rural character of the area deriving from the dominant pastoral land uses, a sense of spaciousness and the **very** limited level of built development (**including rural living**), integrated by vegetation, which collectively forms a marked contrast to the neighbouring urban land use.

**Commented [AL14]:** While the smooth gently sloping pastoral landcover is appreciated as a backdrop to urban Wānaka, this occurs primarily because of its farming landuse and managed landcover. Furthermore, it is only partially glimpsed from most places, as a typical lower slope transition from the steep rugged slopes of Mt Alpha to urban Wānaka. It is certainly not seen as a distinctive fan shape.

### Summary of Landscape Values

Physical • Perceptual (Sensory) • Associative

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 the Studholme Road area can be summarised as follows:

27. **Moderate physical values** relating to the geological importance of the fan, scarp and moraine landforms, the productive soils (with irrigation) and associated agricultural land uses, and the patterns of rural shelterbelts, shade, and specimen trees framing open areas of pastoral land.
28. **Moderate associative values** relating to the mana whenua associations of the area, the historic heritage of European pastoral farming, ~~and the shared and recognised values of the area as a swathe of predominantly pastoral land 'greenbelt' on the southwestern edge of Wānaka, as a spacious~~ the rural transition between the urban area and mountains and as an area of rural working character.
29. **Moderate perceptual values** relating to the expressiveness of the ~~lower Alpha fan, scarp and moraine landforms~~ mountain slopes and ~~roche moutonees~~, the ~~scenic~~ views of area as part of the spacious and green working rural backdrop to urban Wānaka, the low-key rural tranquillity and quietness (in places), and the moderate level of naturalness, with ~~very~~ little built development, which remains subordinate to working rural patterns. ~~The perception of naturalness is reduced in places where there is an obvious influence of human modification.~~

**Commented [BG15]:** OS10.11 Michael Bathgate, Kai Tahu Ki Otago

**Commented [AL16]:** Suggested change as taken from the Mt Alpha schedule.

## Landscape Capacity

The landscape capacity ~~rating~~ of the **Rural Zone** Studholme Road area for a range of activities is set out below. This provides high level guidance as to potential characteristics or locational matters that may assist with identifying appropriate development within the area.

- i. **Commercial recreational activities** – ~~limited~~ **some** landscape capacity for small-scale and low-key activities that: are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).
- ii. **Visitor accommodation and tourism related activities** – ~~very limited~~ **some** landscape capacity for activities that are: located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a **sympathetic** small scale and 'low-key' rural character; integrate **appreciable** landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). **Extremely limited** landscape capacity for small-scale and low-key tourism-related activities that are: visually recessive; designed to be ~~small~~ of a **sympathetic** scale and have a low key 'rural' character; integrate **appreciable** landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).

**Commented [BG17]:** Text amendment made to align with PALS text approach and improve clarity, in accordance with submission requests. For example, see OS29.4, OS30.9 and OS27.3

**Commented [AL18]:** If there is 'some' capacity for urban, there is also capacity for this.

- iii. ~~Urban expansions – extremely limited to no capacity outside the ambit of the QLDC 2021 Spatial Plan. Urban expansions – extremely limited or no landscape capacity. However, it is acknowledged that the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.~~

~~Urban expansions – some landscape capacity as identified in the QLDC 2021 Spatial Plan. From a landscape perspective, the area suggests a logical expansion area as it adjoins the existing urban area and the area's 'outer' boundary corresponds to legible and defensible 'landscape' boundary (i.e. ONL/escarpment boundary).~~

Urban expansions – some landscape capacity as identified in the QLDC 2021 Spatial Plan. From a landscape perspective, the area suggests a logical expansion area as it adjoins the existing urban area and the area's 'outer' boundary corresponds to legible and defensible 'landscape' boundary (i.e. ONL/escarpment boundary).

**Commented [BG19]:** As the JWS explains, the fact that this area is identified in the QLDC 2021 Spatial Plan as an area for potential future urban expansion caused problems with the assignment of a capacity rating for urban expansion, and for the relative ratings for urban expansion and rural living.

The JWS explains that subject to the concerns raised about the definition of urban expansion, the experts are agreed that a capacity rating for urban expansion may be appropriate as expressed in the proposed alternate wording for iii.

**Commented [EF20]:** OS7.18 - Florence Micoud, OS30.24, 30.26, 30.12 - Deborah and Stephen Brent as trustees of the Hawthenden Trust

**Commented [AL21]:** Do not agree with the amendments (both as agreed in JWS and recommended in rebuttal) and seek the original drafting be retained. The area identified in the Spatial Plan generally aligns with the Studholme Road schedule area. Also the JWS version leaves it silent as to what the capacity is for urban development within the area denoted in the Spatial Plan. Better to stay with 'Some'

- iv. **Intensive agriculture** – **some** landscape capacity where the quality of views and aesthetic attributes and values are maintained or enhanced.
- v. **Earthworks** – **Limited some** landscape capacity to absorb earthworks associated with trails (including a potential route between the Top 10 Holiday Park and the eastern end of Studholme Road), farming and rural living/visitor accommodation/tourism related activities that maintain naturalness and expressiveness values and integrate with existing natural landform patterns.
- vi. **Farm buildings** – **some** landscape capacity for **modestly-scaled** buildings that reinforce the **existing** rural character.
- vii. **Mineral extraction** – **very limited** landscape capacity for farm-scale quarries within the area that maintain or enhance the quality of views, naturalness values and aesthetic values.
- viii. **Transport infrastructure** – **very limited** landscape capacity to absorb additional infrastructure that is of a modest scale and low-key rural character.
- ix. **Utilities and regionally significant infrastructure** – **limited** landscape capacity for additional district-scale infrastructure that is buried or located such that they are screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened, these should be designed and located so that they are not visually prominent. In the case of the National Grid, **limited** landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks. **Very limited** landscape capacity for other larger-scale regionally significant infrastructure.
- x. **Renewable energy generation** – **some** landscape capacity for small-scale wind or solar generation located where topography or mature vegetation ensures it is not highly visible from public places. **Very limited** landscape capacity for larger-scale commercial renewable energy generation.
- xi. **Forestry** – **limited some** landscape capacity for scattered woodlots of up to 2 hectares in area.
- xii. **Rural living** – **extremely limited or no** landscape capacity to absorb additional rural living, given that the area has been earmarked for urban expansion in the QLDC 2021 Spatial Plan and rural living development is likely to stymie efficient urban use in the future.

Rural living – limited capacity outside the ambit of the QLDC 2021 Spatial Plan, to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development and the absence of a discernible defensible edge to Wānaka makes the neighbouring parts of the area particularly vulnerable to urban development creep. Any additional rural living should be: set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and maintain rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points.

Rural living – limited landscape capacity to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development and the absence of a discernible defensible edge to Wānaka makes the neighbouring parts of the area particularly vulnerable to urban development creep. Any additional rural living should be: set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and maintain rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points. However, it is acknowledged that the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

**Commented [BG22]:** BG does not support the deletion of the term 'modestly scaled' as the term assists in providing guidance on the scale of farm building development that merits a landscape capacity rating of 'some'. It is her understanding that the landscape capacity, and ultimately the landscape 'appropriateness' of farm building development that does not align with the term 'modestly scaled' would be considered afresh as part of a site specific landscape assessment and would not be specifically subject to this aspect of the Schedule.

**Commented [BG23]:** BG does not support the deletion of the term 'existing' as she considers this provides helpful guidance in assessing the appropriateness of a farm building within the specific Schedule area and aligns with the overarching policy intentions for the RCL of maintaining landscape character and maintaining or enhancing visual amenity values.

**Commented [BG24]:** OS30.20 Rosie Hill, Hawthenden Trust

**Commented [BG25]:** OS30.20 Rosie Hill, Hawthenden Trust

**Commented [BG26]:** BG agrees with the proposed alternate wording for xii.

**Commented [EF27]:** OS7.20 - Florence Micoud, OS30.20, OS30.26, OS30.12 - Deborah and Stephen Brent as trustees of the Hawthenden Trust

Rural living – extremely limited some landscape capacity to absorb additional rural living, given that the area has been earmarked for urban expansion in the QLDC 2021 Spatial Plan and rural living development is likely stymie efficient urban use in the future.

**Commented [AL28]:** Do not agree with the proposed amendments (both as agreed in EWC and recommended in rebuttal).

As with above, if there is some capacity for urban there is also capacity for rural living.

## Plant and Animal Pests

- A. Plant pest species include wilding conifers, hawthorn, crack willow, broom, and lupin.
- B. Animal pest species include rabbits, stoats, feral cats, possums, hedgehogs, rats, and mice.

## 21.23.7 Studholme Road: Schedule of Landscape Values

### Key:

Normal text – notified version of Schedules

Black underline and ~~strikethrough~~ text – recommended amendments based on submissions, with submissions numbers referenced (May 2026)

Blue underline and ~~strikethrough~~ text – amendments that have been agreed in EWC (6-9 July 2026)

Red underline and ~~strikethrough~~ text – amendments recommended in EWC that have not been agreed (6-9 July 2026)

Purple underline and ~~strikethrough~~ text – recommended amendments made in Rebuttal Evidence (12 August 2026)

Green underline and ~~strikethrough~~ text – recommended amendments made for Eric Hopgood on behalf of Hawthenden Limited

### Application

Preamble 21.23, particularly clauses 3.1 – 3.3, explains that the application of the Schedule is to the Rural Zone only. The Assessment Extent for this Schedule includes areas of land that are zoned Rural.

### General Description of the Area

The Studholme Road area roughly corresponds to an irregularly shaped relatively small-scale pocket of elevated land on the southwestern edge of Wānaka (including a sliver of land sandwiched between the Alpha Range PA (ONL) and urban development on Heaton Park Drive). Urban residential land adjoins the north, northeast and western boundaries. Rural Lifestyle zoned land adjoins the eastern side. The south and western edge abuts the eastern edge of the upper Alpha Fan, which is part of the Mount Alpha PA (ONL).

### 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

### Landforms and land types

1. The surficial geology of the area includes both outwash gravels and glacial till from the glaciers that formed the Upper Clutha Basin and Lake Wānaka.
2. The sequence of landforms includes:
  - a. terrace and moraine landforms that were derived from glacial-fluvial action that truncated the large alluvial fan at the base of the Alpha Range (Alpha Fan);
  - b. alluvial fan associated with Stoney Creek; and
  - c. a series of gentle terrace risers and rolling slopes along the urban edge of the terrace/moraine that serve to differentiate the more elevated terrace and lower Alpha fan area (and coinciding with the Studholme Road area) from the Wānaka valley floor.

**Commented [BG1]:** Text amendment made to align with PALS text approach and improve clarity, in accordance with submission requests. For example, see OS29.4, OS30.9 and OS27.3

**Commented [AL2]:** The western boundary looks to abut residential/urban development (highlighted below). Suggest amending.



3. The relatively free-draining brown and pallic soils with reasonable fertility and largely gentle contour, **reflect support the current and historic** pastoral farming land uses in the area.

### Hydrological features

4. Stoney and Centre Creeks draining from the Alpha Range across the terrace to Lake Wānaka (Roys Bay). These creeks are ephemeral. Stoney Creek to the north, is the largest of the two and has been subject to significant flooding events in the past and natural hazard mitigation earthworks have been undertaken in the catchment. The alluvial fan of Stoney Creek is active and there is the potential that the path of the creek could alter in the future.
5. The Wānaka Basin Cardrona gravel aquifer which underlies the area and Wānaka township. Water take from the aquifer is currently over-allocated.

### Ecological features and vegetation types

6. Distinctive exotic vegetation types include:
  - a. Exotic shelterbelts (poplar, macrocarpa, Douglas fir, and pine) with scattered shade and exotic deciduous specimen trees (including walnuts and willows).
  - b. Exotic amenity plantings around rural dwellings, rural buildings, and along driveways.
  - c. Small areas of conifer woodlots on either side of Stoney Creek towards the northern end of the area.
  - d. Areas of semi-improved pasture and unimproved rank exotic grassland.
7. Scheduled *Sequoiadendron giganteum* (Giant Redwood) located towards the southern end of the area.
8. Rank exotic grassland may be utilised by skinks.

### Land use patterns and features

9. The majority of the area forms a small part of a much larger rural landholding (sheep and deer farming with some forestry) **being the Hawthenden Farm, which has been extensively farmed since approximately 1878.** The area is dominated by **working-land-use farming** with **only one smaller-scale rural living lots (approximately 0.6ha to 3ha)** evident. A cluster of rural cottages and buildings is located roughly in the centre of the area. All of the rural and rural living buildings are well integrated by mature plantings which limits their visibility from outside the area.

[9A. The area has been identified for urban expansion as future urban in the Queenstown Lakes QLDC 2024 Spatial Plan 2021.](#)

10. Neighbouring land uses which have an influence on the landscape character of the area due to their scale, character, and/or proximity include:

- a. Urban Residential zoned land (and the Wānaka Urban Growth Boundary) and Rural Lifestyle zoning around the northwest, **west**, north, and east sides of the area. **The general absence of a strong natural landscape boundary along these edges makes the area vulnerable to development creep.**
- b. The Mount Alpha PA (ONL) and working farmland on the fan at the base of the Alpha Range to the **west and south.**
- c. **The area forms part of the 'greenbelt' swathe of pastoral farming framing the southwestern edge of Wānaka township and which reads as a sympathetic transition between the urban area and rugged mountains of the Alpha Range.**

**Commented [BG3]:** OS 30.15 Rosie Hill, Hawthenden Trust

**Commented [EF4]:** OS30.26, 30.12 - Deborah and Stephen Brent as trustees of the Hawthenden Trust

**Commented [AL5]:** This is a value judgement not a statement of character.

**Commented [AL6]:** To the west is urban development.

**Commented [AL7]:** Have already said it is farmland.

- d. The neighbouring Wānaka Top 10 Holiday Park offering an all year-round accommodation mix including cabins, family units, campervan sites and tent site.

### Archaeological and heritage features and their locations

11. Stone dairy building, circa 1890, at Hawthenden Farm.

### Mana whenua features and their locations

12. The entire area is ancestral land to many whānau within the iwi of Kāi Tahu whānui and, as such, all landscape is significant, given that whakapapa, whenua, and wai are all intertwined in te ao Māori.

#### 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

13. Kāi Tahu whakapapa connections to whenua and wai generate a kaitiaki duty to uphold the mauri of all important landscape areas.

### Historic attributes and values

14. The Studholme Road area ~~has significance in its representation of~~ is an example of the evolution of farming in the Wānaka Area. The area was initially part of the nucleus of the expansive Wanaka Station during the 1860s and 1870s, while later 19th century agriculture focused on more-intensive, smaller-scale sheep farming. This is a transition that is typical for most rural land in Central Otago and the Queenstown Lakes District.

Commented [BG8]: OS10.11 Michael Bathgate, Kai Tahu Ki Otago

### Shared and recognised attributes and values

15. ~~Valued as largely pleasant working farmland with limited rural living close to Wānaka, with a high level of visual and rural amenity.~~
16. The identity ~~of the area as a 'predominantly pastoral green belt' area~~ A farmed area on the south-western edge of Wānaka ~~providing a sympathetic transition to the vast Alpha Range~~ ~~ONLY~~.

Commented [AL9]: No evidence that it is 'valued' as such - by who?

Commented [AL10]: Keep it factual.

#### Perceptual (Sensory) Attributes and Values

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

### Legibility and expressiveness attributes and values

17. The alluvial fan material from Mount Alpha, eroded by fluvial action from a more recent glacial advance along with part of the terminal moraine that encloses Wānaka are expressive of the glacial processes that have shaped the Wānaka Basin.

### Particularly important views to and from the area

18. The intermittent sequence of ~~attractive and~~ varied mid to longer-range views of parts of the area from Studholme Road (both ends), Mount Iron, Wānaka town centre, the eastern foreshore of Roys Bay and the adjacent eastern part of Wānaka. In these views the area reads as a ~~spacious~~ rural area adjacent to

Commented [AL11]: Is it 'attractive' if it is predominantly farmland?

urban Wānaka and backdropped by the proximate mountain context of the Alpha Range and the **farmed and modified** upper Alpha Fan. In the more distant views, the area forms part of the continuous patterning of elevated, gently sloping and irregularly shaped 'fan' of land and reads as an integrated part of the Alpha Range landform system.

### Naturalness attributes and values

19. Overall, there is a moderate-low level of naturalness with a predominance of natural, rather than built, elements; but **modification due to** human intervention as managed farmland and rural living is evident.

**Commented [AL12]:** It has been farmed and modified for over a century.

### Memorability attributes and values

20. ~~Memorable to visitors, residents and locals as~~ Part of the working rural backdrop to Wānaka ~~that functions as a greenbelt and spacious transition~~ between the urban area and mountains of the Alpha Range.

**Commented [AL13]:** No evidence from visitors, residents or locals that it is memorable.

### Transient attributes and values

21. Autumn leaf colour and seasonal loss of leaves associated with the exotic trees.
22. Seasonal pasture colours.
23. The changing shadow patterns from shelter belts and the presence of stock and wildlife such as hawks.

### Remoteness/wildness attributes and values

24. Rural tranquillity and quietness are currently experienced in parts of the area away from the urban edge where the levels of activity are consistent with 'working farmland'.

### Aesthetic attributes and values

25. The experience of all of the values identified above from public and private viewpoints.
26. More specifically, this includes:
  - a. ~~the highly attractive~~ views of the area, seen as part of a larger, working rural backdrop and transition between Wānaka and the Alpha Range;
  - b. ~~juxtaposition and contrast between the smooth and green 'tamed' appearance of the area and the upper Alpha Fan and the rougher, browner, and more visually complex rangelands of the upper Alpha Range; and~~
  - c. the distinctly rural character of the area deriving from the dominant pastoral land uses, a sense of spaciousness and the **very** limited level of built development (**including rural living**), integrated by vegetation, which collectively forms a marked contrast to the neighbouring urban land use.

**Commented [AL14]:** While the smooth gently sloping pastoral landcover is appreciated as a backdrop to urban Wānaka, this occurs primarily because of its farming landuse and managed landcover. Furthermore, it is only partially glimpsed from most places, as a typical lower slope transition from the steep rugged slopes of Mt Alpha to urban Wānaka. It is certainly not seen as a distinctive fan shape.

### Summary of Landscape Values

Physical • Perceptual (Sensory) • Associative

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 the Studholme Road area can be summarised as follows:

27. **Moderate physical values** relating to the geological importance of the fan, scarp and moraine landforms, the productive soils (with irrigation) and associated agricultural land uses, and the patterns of rural shelterbelts, shade, and specimen trees framing open areas of pastoral land.
28. **Moderate associative values** relating to the mana whenua associations of the area, the historic heritage of European pastoral farming, ~~and the shared and recognised values of the area as a swathe of predominantly pastoral land 'greenbelt' on the southwestern edge of Wānaka, as a spacious~~ the rural transition between the urban area and mountains and as an area of rural working character.
29. **Moderate perceptual values** relating to the expressiveness of the ~~lower Alpha fan, scarp and moraine landforms~~ mountain slopes and ~~roche moutonees~~, the ~~scenic~~ views of area as part of the spacious and green working rural backdrop to urban Wānaka, the low-key rural tranquillity and quietness (in places), and the moderate level of naturalness, with ~~very~~ little built development, which remains subordinate to working rural patterns. ~~The perception of naturalness is reduced in places where there is an obvious influence of human modification.~~

**Commented [BG15]:** OS10.11 Michael Bathgate, Kai Tahu Ki Otago

**Commented [AL16]:** Suggested change as taken from the Mt Alpha schedule.

## Landscape Capacity

The landscape capacity rating of the Rural Zone Studholme Road area for a range of activities is set out below. This provides high level guidance as to potential characteristics or locational matters that may assist with identifying appropriate development within the area.

- i. **Commercial recreational activities** – ~~limited~~ **some** landscape capacity for small-scale and low-key activities that: are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).
- ii. **Visitor accommodation and tourism related activities** – ~~very limited~~ **some** landscape capacity for activities that are: located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a **sympathetic** ~~small~~ scale and 'low-key' rural character; integrate **appreciable** landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). **Extremely limited** landscape capacity for small-scale and low-key tourism-related activities that are: visually recessive; designed to be ~~small~~ of a **sympathetic** scale and have a low key 'rural' character; integrate **appreciable** landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).
- iii. ~~Urban expansions – extremely limited to no capacity outside the ambit of the QLDC 2021 Spatial Plan.~~

**Commented [BG17]:** Text amendment made to align with PALS text approach and improve clarity, in accordance with submission requests. For example, see OS29.4, OS30.9 and OS27.3

**Commented [AL18]:** If there is 'some' capacity for urban, there is also capacity for this.

~~Urban expansions – extremely limited or no landscape capacity. However, it is acknowledged that the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.~~

~~Urban expansions – some landscape capacity as identified in the QLDC 2021 Spatial Plan. From a landscape perspective, the area suggests a logical expansion area as it adjoins the existing urban area and the area's 'outer' boundary corresponds to legible and defensible 'landscape' boundary (i.e. ONL/escarpment boundary).~~

**Urban expansions – some** landscape capacity as identified in the QLDC 2021 Spatial Plan. From a landscape perspective, the area suggests a logical expansion area as it adjoins the existing urban area and the area's 'outer' boundary corresponds to legible and defensible 'landscape' boundary (i.e. ONL/escarpment boundary).

**Commented [BG19]:** As the JWS explains, the fact that this area is identified in the QLDC 2021 Spatial Plan as an area for potential future urban expansion caused problems with the assignment of a capacity rating for urban expansion, and for the relative ratings for urban expansion and rural living.

The JWS explains that subject to the concerns raised about the definition of urban expansion, the experts are agreed that a capacity rating for urban expansion may be appropriate as expressed in the proposed alternate wording for iii.

**Commented [EF20]:** OS7.18 - Florence Micoud, OS30.24, 30.26, 30.12 - Deborah and Stephen Brent as trustees of the Hawthenden Trust

**Commented [AL21]:** Do not agree with the amendments (both as agreed in JWS and recommended in rebuttal) and seek the original drafting be retained. The area identified in the Spatial Plan generally aligns with the Studholme Road schedule area. Also the JWS version leaves it silent as to what the capacity is for urban development within the area denoted in the Spatial Plan. Better to stay with 'Some'

- iv. **Intensive agriculture** – **some** landscape capacity where the quality of views and aesthetic attributes and values are maintained or enhanced.
- v. **Earthworks** – **Limited some** landscape capacity to absorb earthworks associated with trails (including a potential route between the Top 10 Holiday Park and the eastern end of Studholme Road), farming and rural living/visitor accommodation/tourism related activities that maintain naturalness and expressiveness values and integrate with existing natural landform patterns.
- vi. **Farm buildings** – **some** landscape capacity for **modestly-scaled** buildings that reinforce the **existing** rural character.
- vii. **Mineral extraction** – **very limited** landscape capacity for farm-scale quarries within the area that maintain or enhance the quality of views, naturalness values and aesthetic values.
- viii. **Transport infrastructure** – **very limited** landscape capacity to absorb additional infrastructure that is of a modest scale and low-key rural character.
- ix. **Utilities and regionally significant infrastructure** – **limited** landscape capacity for additional district-scale infrastructure that is buried or located such that they are screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened, these should be designed and located so that they are not visually prominent. In the case of the National Grid, **limited** landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks. **Very limited** landscape capacity for other larger-scale regionally significant infrastructure.
- x. **Renewable energy generation** – **some** landscape capacity for small-scale wind or solar generation located where topography or mature vegetation ensures it is not highly visible from public places. **Very limited** landscape capacity for larger-scale commercial renewable energy generation.
- xi. **Forestry** – **limited some** landscape capacity for scattered woodlots of up to 2 hectares in area.
- xii. **Rural living** – **extremely limited or no** landscape capacity to absorb additional rural living, given that the area has been earmarked for urban expansion in the QLDC 2021 Spatial Plan and rural living development is likely to stymie efficient urban use in the future.

Rural living – limited capacity outside the ambit of the QLDC 2021 Spatial Plan, to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development and the absence of a discernible defensible edge to Wānaka makes the neighbouring parts of the area particularly vulnerable to urban development creep. Any additional rural living should be: set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and maintain rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points.

Rural living – limited landscape capacity to absorb additional rural living without cumulative adverse effects on associative and perceptual values. The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development and the absence of a discernible defensible edge to Wānaka makes the neighbouring parts of the area particularly vulnerable to urban development creep. Any additional rural living should be: set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and maintain rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points. However, it is acknowledged that the Schedule area is identified as future urban in the Queenstown Lakes Spatial Plan 2021 which may influence landscape capacity.

**Commented [BG22]:** BG does not support the deletion of the term 'modestly scaled' as the term assists in providing guidance on the scale of farm building development that merits a landscape capacity rating of 'some'. It is her understanding that the landscape capacity, and ultimately the landscape 'appropriateness' of farm building development that does not align with the term 'modestly scaled' would be considered afresh as part of a site specific landscape assessment and would not be specifically subject to this aspect of the Schedule.

**Commented [BG23]:** BG does not support the deletion of the term 'existing' as she considers this provides helpful guidance in assessing the appropriateness of a farm building within the specific Schedule area and aligns with the overarching policy intentions for the RCL of maintaining landscape character and maintaining or enhancing visual amenity values.

**Commented [BG24]:** OS30.20 Rosie Hill, Hawthenden Trust

**Commented [BG25]:** OS30.20 Rosie Hill, Hawthenden Trust

**Commented [BG26]:** BG agrees with the proposed alternate wording for xii.

**Commented [EF27]:** OS7.20 - Florence Micoud, OS30.20, OS30.26, OS30.12 - Deborah and Stephen Brent as trustees of the Hawthenden Trust

Rural living – extremely limited some landscape capacity to absorb additional rural living, given that the area has been earmarked for urban expansion in the QLDC 2021 Spatial Plan and rural living development is likely stymie efficient urban use in the future.

**Commented [AL28]:** Do not agree with the proposed amendments (both as agreed in EWC and recommended in rebuttal).

As with above, if there is some capacity for urban there is also capacity for rural living.

## Plant and Animal Pests

- A. Plant pest species include wilding conifers, hawthorn, crack willow, broom, and lupin.
- B. Animal pest species include rabbits, stoats, feral cats, possums, hedgehogs, rats, and mice.