

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER OF a variation to Chapter 21 – Rural of the Proposed District
Plan to introduce Landscape Schedules

STATEMENT OF EVIDENCE OF SCOTT SNEDDON EDGAR

ON BEHALF OF THE FOLLOWING SUBMITTERS:

SUNNYHEIGHTS LIMITED (SUBMITTER #37 AND FURTHER SUBMITTER #58)

SCOTT AUBREY FAMILY TRUST (SUBMITTER #43)

EXCLUSIVE DEVELOPMENTS LIMITED (SUBMITTER #45)

26th June 2026



Introduction

1. My name is Scott Sneddon Edgar. I am a Resource Management Planner and hold a Bachelor of Arts Degree (Honours) in Town and Country Planning from Strathclyde University in Glasgow, Scotland. I am an Associate Member of the New Zealand Planning Institute.
2. I am an independent planning consultant based in Wanaka. Prior to my current position I was employed by Southern Land Limited, a Wanaka based survey and planning consultancy, from October 2006 to November 2018. During my time at Southern Land I was involved principally with the preparation of resource consent applications and the presentation of planning evidence at Council hearings. I was also involved in the preparation of submissions and further submissions on Stages 1, 2 and 3 of the Proposed District Plan, participation in the Stage 1 hearings and subsequent appeals and Environment Court proceedings.
3. Prior to relocating to New Zealand in 2005 I worked as a development control planner with various Scottish local authorities in both rural and urban regions.
4. Upon my arrival in New Zealand I was employed as a resource consents planner in the Wanaka office of Civic Corporation Limited before taking up a position with Southern Land Limited. I have a total of 27 years' planning experience, 21 of which have been gained in New Zealand.

Code of Conduct

5. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court of New Zealand Practice Note 2023 and I agree to comply with it. In that regard I confirm that this evidence is written within my expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of Evidence

6. I have been engaged by the following parties to provide expert planning evidence relating to the landscape schedules:
 - Sunnyheights Limited (Submitter #37 and Further Submitter #58)
 - Scott Aubrey Family Trust (Submitter #43)
 - Exclusive Developments Limited (Submitter #45)

7. In preparing this evidence I have read and considered the following documents and information:

- The notified landscape schedules, s32 Report and supporting documents;
- The Proposed District Plan;
- The Kāi Tahu Ki Otago Natural Resource Management Plan 2005;
- The Cry of the People, Te Tangi a Taurira : Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008;
- The Partially Operative Otago Regional Policy Statement 2019;
- The Proposed Otago Regional Policy Statement 2021;
- The s42A Report prepared by Ms. Emily Frew;
- The Evidence in Chief of Ms. Bridget Gilbert; and
- The Evidence in Chief of Mr. Ben Espie.

8. My brief of evidence is set out as follows:

- Are the schedules required at all?
- Sunnyheights Limited
- Scott Aubrey Family Trust
- Exclusive Developments Ltd

9. As directed by the Hearing Panel my evidence will focus on areas of disagreement. Where my evidence does not address specific submission points it can be taken that I agree with the recommendations of the Council officers in relation to those points.

ARE THE RCL SCHEDULES REQUIRED AT ALL?

10. Council's s32 Evaluation Report sets out the background to the Upper Clutha Landscape Schedules Variation stating¹ that, through appeals on Stage 1 of the PDP, the Environment Court decided that requiring the protection of ONL/F landscape values and the maintenance or enhancement of RCL values without specifying what those values were would not provide

¹ S32, Paragraph 2.6

adequate certainty that the higher order provisions of the PDP would be achieved. Consequently it is stated that the Court directed that the values of the District's ONL/Fs and RCLs should be identified and included in landscape schedules within the Plan.

11. The s32 report goes on to explain² that due to the extent of ONL/Fs in the District the Court identified a number of Priority Areas within the ONL/F and RCL that were to be scheduled first.
12. I consider the premise, which underpins the proposed Upper Clutha Landscape Schedules Variation, that the Court intended for all ONL/Fs and RCLs to be scheduled is misleading and overstates the extent of the landscape scheduling outcome required by the Court's findings.
13. The Environment Court's decisions on Stage 1 landscape appeals set out the higher order landscape provisions in Chapter 3 – Strategic Direction and Chapter 6 – Landscapes and Rural Character of the Proposed District Plan. This variation proposed no substantive changes to these provisions.
14. The purpose of Chapter 3 is to set out the Plan's overarching strategic direction for the management of growth, land use and development to ensure the sustainable management of the District's special qualities. Those special qualities include the District's distinctive lakes, rivers, alpine and high country landscapes free of inappropriate development³.
15. Chapter 3 then sets out strategic issues to be addressed in order that the District's special qualities are retained. The strategic issues include:
 - that growth pressure risks detracting from rural landscapes, particularly the ONL/Fs⁴; and
 - that some resources in the District, particularly ONL/Fs and their landscape values, require effective identification and protection⁵
16. While the identified special qualities and strategic issues are not intended to be exhaustive there is a strong emphasis on the District's ONL/Fs through specific reference to ONL/Fs, reference to lakes, rivers, alpine and high country landscapes (which would generally be

² S32, Paragraph 2.7

³ PDP 3.1a.

⁴ Strategic Issue 2

⁵ Strategic Issue 4

classified as ONL/Fs) and the use of terminology from s6 of the RMA (i.e. 'free of inappropriate development' and 'protection').

17. The Strategic Objectives and Policies of the Plan are intended to address the identified strategic issues and, in doing so, achieve the purpose of the Act.
18. The Strategic Objectives under 3.2.5 – *The Retention of the District's distinctive landscapes* introduce the concept of landscape value identification. Strategic Objective 3.2.5.1 is that the landscape values and capacity of the District's ONL/Fs are identified and Strategic Objective 3.2.5.2 is that those values are protected whether they are identified in a Priority Area ONL/F landscape schedule or through specific landscape assessment.
19. Similarly Strategic Objective 3.2.5.7 is that Priority Areas of RCL and their associated landscape character and visual amenity values are identified within the Upper Clutha Basin. This policy direction relates to Priority Areas only.
20. Chapter 3 then goes on to set out Strategic Policies that are intended to achieve the Strategic Objectives. Strategic Policies 3.3.29 and 3.3.33 relate to the identification of the landscape values of the ONL/Fs and RCLs respectively.
21. Strategic Policy 3.3.29 directs that landscape values and capacity of the ONL/F Priority Areas are identified and scheduled in accordance with the values identification framework set out in Strategic Policies 3.3.36 to 3.3.38 or, outside of the identified Priority Areas, identified in accordance with the landscape assessment methodology set out in Strategic Policy 3.3.45.
22. Similarly Strategic Policy 3.3.33 directs that the landscape character and visual amenity values of RCLs that are to be maintained or enhanced and associated landscape capacity are either identified and scheduled for the Priority Areas of the Upper Clutha Basin in accordance with the RCL values identification framework set out in Strategic Policies 3.3.39 to 3.3.41 or, outside of the identified Priority Areas, in accordance with the landscape assessment methodology set out in Strategic Policy 3.3.45.
23. The strategic policies therefore set out a clear approach to the identification of landscape values and capacities being the scheduling of the ONL/F and Upper Clutha Basin RCL Priority Areas and otherwise through assessment in accordance with the prescribed landscape assessment methodology.

24. The strategic objectives and policies of the PDP, which were borne out of the Environment Court's decisions on the Stage 1 landscape appeals, do not require or provide for the scheduling of the District's landscapes beyond the Priority Areas specifically listed in Strategic Policies 3.3.36 and 3.3.39.
25. The higher order provisions do not imply that the Priority Areas are the first landscapes to be scheduled with other non-priority area schedules to follow. The Priority Areas were identified by the Court as being the parts of the District's ONL/Fs and RCLs that were subject to the greatest growth pressure, linking back to Strategic Issue 2 and the Court did not envisage that the scheduling of all ONL/F and RCL landscapes would be required.
26. In addition I note that Mr Espie considers⁶ that the proposed RCL Landscape Schedule Areas are relatively small and generally would not be considered landscapes in their own right. The values identification framework for the RCL schedules⁷ require that landscape values, attributes and capacity are identified and described at an appropriate landscape scale whereas the landscape assessment methodology for RCLs requires⁸ the definition of a relevant landscape character area and its wider landscape context.
27. Based on Mr Espie's opinion that the proposed RCL Landscape Schedule Areas are not large enough to be considered landscapes in their own right I consider that the landscape assessment methodology set out in S.P. 3.3.45 is the most appropriate means of identifying landscape character, visual amenity values and capacity outside of the RCL Priority Areas.
28. In addition Mr. Espie notes⁹ that where scheduling is undertaken for large areas containing many landholdings the schedule may be a useful landscape planning tool. However when the scheduling exercise is applied to smaller areas and areas that largely comprise a single land holding, the schedules become more pointed and onerous.
29. I note that the landscape capacity rating scale for the Priority Areas and the proposed RCL Schedule Areas is the same despite the general difference in size between the Priority Areas and proposed RCL Schedule Areas. It is unclear whether splitting the RCLs up into small schedule areas and then defining landscape capacity at that smaller scale would have the effect of compartmentalising the landscape and its capacity, resulting in lower overall capacity

⁶ Espie EIC, Paragraph 20

⁷ S.P. 3.3.40

⁸ SP. 3.3.45 b.i.

⁹ Espie EIC, Paragraphs 20 and 77

ratings than might otherwise be defined if the schedules were to be prepared at a landscape scale as directed by Strategic Policy 3.3.40 or assessed using the landscape assessment methodology set out in Strategic Policy 3.3.45.

30. I adopt Mr. Espie's opinion with regard to the scale of the proposed RCL schedule areas and consider that the scheduling of smaller areas and areas that are largely held in a single land holding is inefficient, unnecessary and may result in more restrictive capacity ratings than might otherwise be determined through the prescribed landscape assessment methodology.
31. Overall I consider that the s32 analysis of the proposed variation is flawed. Section 32(1)(a) of the Act requires analysis of whether the objective or purpose of a proposal is the most appropriate means of achieving the purpose of the Act. In doing so the proposal must be considered against the strategic objectives and policies of the PDP, which in themselves achieve the purpose of the Act.
32. The purpose of the proposal is stated¹⁰ as being the implementation of the requirements of Chapter 3 of the PDP by scheduling the landscape values of the Priority Areas and introducing additional landscape schedules for the Upper Clutha RCLs to better identify values that are to be maintained or enhanced.
33. The above analysis of the strategic objectives and policies of the PDP demonstrates that there is no requirement or policy support for the scheduling of RCLs beyond the Priority Areas set out in strategic policy 3.3.39. Instead the strategic objectives and policies set out a landscape assessment methodology which is to be used to identify values to be maintained or enhanced outside of the scheduled Priority Areas.
34. The strategic objectives and policies of the PDP have been settled through extensive hearing and Environment Court processes and achieve the purpose of the Act.
35. The proposal disregards the policy direction set out in the strategic objectives and policies and instead seeks to schedule additional parts of the RCL in the Upper Clutha Basin. I consider that this approach is inefficient and inconsistent with the higher order provisions of the plan and is not the most appropriate means of achieving the purpose of the Act.
36. I consider that the cost, benefit, efficiency and effectiveness analysis of the options set out in the s32 assessment fails to adequately assess the economic cost and inefficiency of

¹⁰ S32 Evaluation Report, Paragraph 8.4

progressing a scheduling exercise that is not required or supported by the higher order provisions of the PDP.

37. Of the three options set out in the s32 assessment I consider that Option 2 (to schedule the Mata-au Clutha River PA but do not schedule any additional RCLs in the PDP) is the most appropriate option and there is no associated risk and the strategic objectives and policies of the PDP already clearly set out an appropriate and effective methodology for assessing the values of RCLs that are to be maintained or enhanced.

SUNNYHEIGHTS LIMITED

38. The submission of Sunnyheights Limited challenged the necessity and jurisdiction for the proposed Upper Clutha Landscapes Schedule Variation with a particular interest in the Crosshill schedule area (proposed Schedule 21.23.16).
39. I have addressed the necessity of the UCLS Variation above and consider that it is not the most appropriate means of achieving the purpose of the Act. Notwithstanding my opinion in that regard I will address the wider submission points and outline any text amendments that I consider necessary should the Hearing Panel consider the non-Priority Area RCL schedules are required.

Shared and recognised attributes and values

40. Mr. Espie considers¹¹ that the use of the term 'rural hinterland' in Paragraph 22 is inappropriate. I adopt Mr. Espie's opinion in this regard and consider that Paragraph 22 should be amended as follows:

22. *The identity of the area as part of the 'breathing space' ~~and 'rural hinterland'~~ between Albert Town and Hāwea settlement.*

Particularly important views to and from the area

41. The submission sought the partial deletion of Paragraph 27 on the basis that views across the site are generally fleeting and screened by topography and vegetation and, when leaving Albert Town, are experienced in close proximity and in the context of the urban area rather than being particularly memorable or contrasting.

¹¹ Espie EIC, Paragraph 79

42. Ms. Gilbert recommends the rejection of this submission point due to the lack of supporting technical evidence, preferring her own landscape evaluation.
43. Mr. Espie has addressed this submission point in his EIC¹² and confirms that the terraced landform does result in a number of areas being well hidden from view. Mr. Espie is of the opinion that this should be reflected in Paragraph 27 and notes that it is the parts of the schedule area that are visible from public places that contribute to the visual qualities of the schedule area.
44. I adopt Mr. Espie's opinion in this regard and consider that Paragraph 27 should be amended as follows:

27. *The sequence of attractive short and mid-range 'rural' views from SH6 across the area. From the majority of the stretch of highway south of Dublin Bay Road, the patterning of the steep risers between the terraces combined with road levels means that views are truncated. The proximate urban context of Albert Town and Wānaka forms part of the outlook (in south bound views) and the broader viewing experience (in north bound views), and views of the area are framed by a continuous more distant ONF/L mountain backdrop. For the stretch of the highway near, and to the north of, Dublin Bay Road, the elevated and undulating moraine landform across the northern part of the area backdrops much of the terrace foreground. The higher peaks in the more distant (ONL) mountain context form the backdrop in places. **Where visible from public areas the** ~~The~~ distinctly planar, open, and working rural character of the terraces, in combination with the pastoral and generally open character of the moraine, contributes **to** the impression of a continuous patterning of rural land use across the area and reinforces the coherence of the underlying river terrace and moraine landforms. This is the first open 'rural' view after leaving Albert Town which, in combination with the strong contrast in visual appearance between the area and the proximate Albert Town/Wānaka context, adds to the memorability of the view.*

Memorability attributes and values

¹² Espie EIC, Paragraph 80

45. Mr. Espie considers¹³ that the use of the term ‘rural hinterland’ in Paragraph 34 is inappropriate. I adopt Mr. Espie’s opinion in this regard and consider that Paragraph 34 should be amended as follows:

34. *Memorability to residents and locals as part of the ~~‘rural hinterland’~~ rural landscape between Albert Town and Hāwea Settlement.*

Moderate associative values

46. Mr. Espie considers that “low-moderate” would be a more accurate description of associative values. I adopt Mr. Espie’s opinion in this regard and consider that Paragraph 41 should be amended as follows (including the removal of the term ‘rural hinterland’ which Mr. Espie found inappropriate in relation to Paragraphs 22 and 34):

41 *Low-Moderate ~~Moderate~~ associative values relating to the mana whenua associations of the area, the recreational use of the track along Mata-au (Clutha River), and the shared and recognised values of the area for residents and locals as part of the ~~‘rural hinterland’~~ rural landscape between Albert Town and Hāwea settlement.*

Landscape Capacity

47. Mr. Espie finds¹⁴ that the landscape capacity for commercial recreation activities would be more accurately described as “limited” rather than “very limited”. I agree with Mr. Espie in this regard and consider that the landscape capacity rating should be amended accordingly:

*i. **Commercial recreational activities** – ~~very limited~~ landscape capacity for small-scale and low-key activities that: integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or filtering benefit of natural landscape elements; are 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).*

48. In addition Mr. Espie considers¹⁵ that the capacity rating for rural living should be amended to note that there is “limited” capacity in certain locations and circumstances within the schedule

¹³ Espie EIC, Paragraph 79

¹⁴ Espie EIC, Paragraph 82

¹⁵ Espie EIC, Paragraph 83

area. I adopt Mr. Espie's opinion in this regard. In addition I note that Policy 6.3.4.8 of the PDP, which relates to the management of activities in the RCL and seeks to avoid adverse effects on visual amenity from subdivision, use and development that is highly visible from public places specifically excludes trails as defined in the Plan. I believe that this policy direction should be acknowledged and consider that the capacity rating for rural living should be amended as follows:

- xi. ***Rural living – very limited landscape capacity to absorb additional rural living generally without cumulative adverse effects on associative and perceptual values with limited landscape capacity to absorb a discreet cluster or clusters of rural living development where the activity can be located so as to be inconspicuous when experienced from public places (excluding trails) and where a dominant rural landscape character can be maintained. The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development. 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 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of rural views from public vantage points other than from trails as defined in the Plan.***

s32AA Assessment of Recommended Text Amendments

49. s32AA of the RMA requires that any changes that are proposed since the s32 assessment of a proposal was completed are further assessed at a level of detail consistent with the scale and significance of the changes. Notwithstanding my opinion on the necessity of the non-Priority Area landscape schedules I consider that the proposed changes to the 21.23.16 Crosshill : Schedule of Landscape Values will more accurately describe the attributes that contribute to the landscape character and visual amenity values of the schedule area that are to be maintained or enhanced (in the case of visual amenity values). In addition I consider that the proposed amendment to the capacity rating for commercial recreation activities and rural living will better reflect the characteristics and capacity of the landscape schedule area without compromising its identified landscape character and visual amenity values.
50. On this basis I consider that, if the Hearing Panel find that the non-Priority Area landscape schedules are required, the proposed changes will result in a more efficient and effective

schedule that will better achieve the objectives of the Proposed District Plan and the purpose of the RMA.

SCOTT AUBREY FAMILY TRUST

51. The submission of the Scott Aubrey Family Trust sought amendments to 21.23.11 East of Luggate : Schedule of Landscape Values to reflect the gravel resource within the schedule area, correct some inaccuracies in terms of the size of the submitters farm property and the size of woodlots within the schedule area and acknowledge the presence of rural living, farm worker accommodation and solar generation facilities. The submission also sought amendments to the landscape capacity ratings for mineral extraction and rural living activities.
52. Council have generally accepted the amendments sought to the description of landforms and land types, ecological features and vegetation types and land use patterns and features and I agree with Council's position on those matters except where discussed below. Council have largely rejected the amendments sought to the landscape capacity ratings for mineral extraction and rural living.

Landforms and land types

53. The submission sought to amend Paragraph 4 to add reference to gravels as a resource within the schedule area. Ms. Gilbert generally adopts the suggested addition to Paragraph 4 albeit with the removal of reference to "good" gravels and the addition of "in places".
54. I accept that the entire schedule area may not be underlain by good gravels and agree that the addition of "in places" is appropriate. The submitter has however encountered good gravels during excavations on their property. The submitter has advised that the gravels have been able to achieve the NZTA M4 2024 specification for basecourse aggregates which I understand is a high standard that is not always readily achieved. The gravels therefore represent an important resource well located within the District. I therefore consider that Paragraph 4 should be amended as follows to reintroduce "good" to the description of the gravels:
 4. *The relatively free-draining and pallic soils with reasonable fertility reflected in pastoral farming and more intensive farming under irrigation and underlain by **good** gravels in places.*

Landscape capacity

55. The submission sought amendments to the notified capacity rating for mineral extraction. The notified capacity for mineral extraction is “limited” for ongoing gravel extraction from the Clutha Mata-au in accordance with ORC’s river management strategy and “very limited” capacity for farm scale quarries.

56. The submission sought the addition of text to clarify what activities associated with gravel extraction from the river might include within the schedule area (i.e. the stockpiling, processing and transportation of gravel sourced from the river on land within the schedule area). Ms. Gilbert rejects the additional text and states¹⁶ that:

“the reference to gravel extraction in the adjacent river, is in recognition of the likelihood that this would impact on the area to at least some degree (e.g. stockpiling). It is understood that gravel extraction from the river is typically, at least in part, about flood protection and for this reason, it does not form a basis for assuming that there is the same level of landscape capacity for gravel extraction in the area.”

57. I agree with Ms. Gilbert that if the removal of gravel from the river is required for river management or flood protection then there is a clear functional need for it to occur in locations directed by the Regional Council and that stockpiling in the adjoining RCL is likely to be required.

58. However I consider that an observer is not likely to be able to tell the difference between a stockpile of gravel sourced from the river and a stockpile of gravel sourced from the RCL. The National Policy Statement for Infrastructure 2025 is a relevant consideration for decision makers and includes the following objective and policy:

2.1 Objective

(1) *The objective of this National Policy Statement is to:*

(a) ensure the national, regional and local benefits of infrastructure are provided for;

(b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;

¹⁶ Gilbert EIC, Landscape Comments Table, OS43.14

- (c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;*
- (d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and*
- (e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.*

Policy 5: Recognising and providing for infrastructure supporting activities

(1) Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by:

- (a) recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised;*
- (b) recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and*
- (c) enabling the timely delivery of infrastructure supporting activities.*

59. The role of quarrying activities as infrastructure supporting activities is to be recognised and provided for and Policy 5 recognises the operational and functional need for quarrying activities to be located in particular environments and locations (i.e. where the minerals are located).
60. Just as there may be a functional need for activities associated with the extraction of gravel from the river to occur adjacent to the river there is a clear functional need for infrastructure supporting quarrying to occur where the resource is located. I therefore consider that if there is capacity for activities associated with the extraction of gravel from the river then there must also be capacity for infrastructure supporting activities. Both are important activities in their own right that have a functional need to locate in the RCL.

61. Mr. Espie agrees¹⁷ that there is limited capacity for extraction activities within the schedule area. I therefore consider that the capacity rating for mineral extraction be amended as originally sought in the submission, being:

vii ***Mineral extraction – limited landscape capacity for ongoing gravel extraction from the Mata-au (Clutha River) in accordance with Otago Regional Council River Management Strategy (being the stockpiling, processing and transportation of gravel sourced from the river on land within the priority area) and very limited landscape capacity for ~~farm-scale~~ quarries elsewhere within the area that maintain or enhance the quality of views, naturalness values and aesthetic values.***

s32AA Assessment of Recommended Text Amendments

62. Notwithstanding my opinion on the necessity of the non-Priority Area landscape schedules I consider that the proposed changes to 21.23.11 East of Luggate : Schedule of Landscape Values will more accurately describe the attributes that contribute to the landscape character and visual amenity values of the schedule area that are to be maintained or enhanced. In addition I consider that the amendments to the a capacity ratings for mineral extraction will acknowledge the resource and the functional need for infrastructure supporting activities to locate in the RCL while ensuring that the values of the RCL are maintained or enhanced.

63. On this basis I consider that, if the hearing panel find that the non-Priority Area landscape schedules are required, the proposed changes will result in a more efficient and effective schedule that will better achieve the objectives of the Proposed District Plan and the purpose of the RMA.

EXCLUSIVE DEVELOPMENTS LIMITED

64. The submission of Exclusive Developments Limited sought amendments to 21.22.25 Mata-au Clutha River : Schedule of Landscape Values to reflect and acknowledge the presence of existing pine plantations within and adjoining the Priority Area and the proximity of the Urban Growth Boundary. These amendments have generally been adopted by Council and I agree with Council's text amendments in this regard.

¹⁷ Espie EIC, Paragraph 60

65. The submission also opposed the notified landscape capacity rating for urban expansion and sought that some direction be added to outline where, and under what circumstances, the extremely limited capacity for urban expansion might be.
66. Mr. Espie has addressed the utility of capacity ratings for urban expansion in his EIC¹⁸ and finds that urban expansion is generally managed through Spatial Plan and/or Plan Change processes rather than through resource consent processes. I agree with Mr. Espie in this regard however I acknowledge that there could be scope for small scale urban expansions to be progressed through a resource consent process, albeit that the avoidance policy in Policy 4.2.1.3 would be a strong deterrent and sets a high bar for any potential grant of consent.
67. I consider that it would not be inappropriate to exclude urban expansions from the landscape capacity ratings for the Mata-au Clutha River ONF schedule as suggested by Mr. Espie.
68. Alternatively if the hearing panel considers the inclusion of a capacity rating for urban expansion is necessary then I consider that the direction sought in the submission would be appropriate. Mr. Espie notes¹⁹ that he agrees that, if there is capacity for urban expansion that capacity is likely to be on the fringes of the UGB at Hikuwai. On that basis I consider that, if a capacity rating for urban expansion is to be included in the Mata-au Clutha River ONF schedule, it should be amended as follows:
- iii **Urban expansions – extremely limited or no landscape capacity with any capacity likely to be in locations that immediately adjoin existing urban growth boundaries and/or existing or zoned urban development where there is scope for environmental enhancement and where future development can be absorbed by existing landform and/or vegetation such that the values of the wider ONF are protected.***
- In the Hikuwai subdivision the Outstanding Natural Feature and Urban Growth boundaries follow the operative zoning edge and are yet to have been examined in this location based upon landscape values and characteristics. In this location there may be the potential for carefully located extension and infill residential activity between existing urban zoned land and the ONF, that integrates landscape restoration and enhancement or enhance public access.***

¹⁸ Espie EIC, Paragraphs 22 and 23

¹⁹ Espie EIC, Paragraph 30

s32AA Assessment of Recommended Text Amendments

69. I consider that the proposed changes to 21.22.25 Mata-au Clutha River : Schedule of Landscape Values will more accurately describe the attributes that contribute to the landscape values of the Outstanding Natural Feature that are to be protected. In addition I consider that the proposed amendment to the capacity rating for urban expansion (if such a capacity rating is considered necessary) will provide direction as to where, and in what circumstances, there might be capacity for urban expansion within the Priority Area.
70. On this basis I consider that the proposed changes will result in a more efficient and effective schedule that will better achieve the objectives of the Proposed District Plan and the purpose of the RMA.



Scott Sneddon Edgar

26th June 2026