

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE
QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Te Pūtahi Ladies Mile Plan Variation in accordance
with section 80B and 80C, and Part 5 of Schedule 1 of the
Resource Management Act 1991.

**STATEMENT OF REBUTTAL EVIDENCE OF BRIDGET MARY GILBERT
24 November 2023**

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Introduction

- 1 My full name is Bridget Mary Gilbert. I am a Landscape Architect and Director of Bridget Gilbert Landscape Architecture Ltd, Auckland.
- 2 I prepared a statement of evidence on behalf of Queenstown Lakes District Council (**QLDC** or **Council**) dated 29 September 2023 on the submissions and further submissions to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**). My evidence considered the Slope Hill Outstanding Natural Feature (**Slope Hill ONF**).
- 3 I have the qualifications and experience as set out at paragraphs 4 to 13 of my statement of evidence dated 29 September 2023.
- 4 I repeat the confirmation given in my evidence that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

Scope of rebuttal evidence

- 5 I attended the expert conferencing session on the Slope Hill ONF on 18 October 2023, and have read and considered the Joint Witness Statement (**Slope Hill ONF JWS**) produced at that expert conferencing session. I have read and considered the evidence filed on behalf of submitters as that evidence relates to my evidence.
- 6 In this evidence I respond to the:
 - (a) Slope Hill ONF JWS dated 18 October 2023;
 - (b) Statement of Evidence of Tony Milne on behalf of Glenpanel Development Limited (73) dated 25 October 2023;
 - (c) Statement of Evidence of David Compton-Moen on behalf of Glenpanel Development Limited (73) dated 25 October 2023 and
 - (d) Statement of Evidence of Philip Blakely on behalf of the Blakely Wallace Family (74) dated 20 October 2023.
- 7 I have also considered the:
 - (a) The experts' joint witness statement on landscape matters, dated 2 November 2023;

- (b) The experts' joint witness statement on planning matters, dated 3 November 2023;
- (c) Statement of Evidence of Tony Milne on behalf of the Anna Hutchinson Family Trust (107) dated 20 October 2023;
- (d) Statement of Evidence of David Compton-Moen on behalf of Koko Ridge (80) dated 20 October 2023;
- (e) Statement of Evidence of James Bentley on behalf of the Queenstown Country Club (106) dated 20 October 2023;
- (f) Statement of Evidence of Wendy Chartres-Moginie on behalf of the Corona Trust (99) dated 20 October 2023;
- (g) Rebuttal Evidence of Stephen Skelton on behalf of the Queenstown Lakes District Council dated 10 November 2023; and
- (h) Rebuttal Statement of Evidence of Jeff Brown on behalf of the Queenstown Lakes District Council dated 10 November 2023.

Expert conferencing on Slope Hill ONF related matters

- 8 The expert conferencing on Slope Hill ONF related matters was attended by myself, Mr Tony Milne and Mr Compton-Moen, and primarily concerned discussion on the relief sought by Glenpanel Development Limited (**Glenpanel**). While some agreement was reached, there is a divergence of expert opinion on several matters including extending the urban growth boundary (**UGB**) up to the 423m contour within the Slope Hill ONF.
- 9 Since conferencing, Mr Milne and Mr Compton-Moen have filed statements of evidence on behalf of Glenpanel, which I respond to below.
- 10 In their statements of evidence, Messrs Milne and Compton-Moen are in agreement with each other on the landscape matters of relevance to my evidence. For this reason, my rebuttal evidence is structured to respond to the points raised by the Glenpanel landscape experts collectively.

21.22.6 Slope Hill Priority Area ONF Schedule of Landscape Values

- 11 The Slope Hill ONF JWS refers to the rebuttal version of 21.22.6 Slope Hill Priority Area ONF Schedule of Landscape Values (**Slope Hill ONF Schedule**). I attach this to my evidence as **Appendix A**.
- 12 Since joint witness conferencing, as part of the Priority Area Schedules Plan Variation process, I have been involved in landscape expert conferencing with respect to the Slope Hill ONF Schedule (with Ms Nikki Smetham of Rough Milne and Mitchell Landscape Architects). I attach the relevant JWS as **Appendix B** to this evidence and note that the landscape experts:
- a) Are generally in agreement with respect to the text of the Slope Hill ONF Schedule as recorded in the **Appendix A**; and
 - b) The only point of disagreement relates to the wording of a sub section of the Slope Hill ONF Schedule, addressing the summary of the physical values.

UGB within an ONF

- 13 As outlined above, Messrs Milne¹ and Compton-Moen² support the delineation of the UGB at the 423m contour of Slope Hill ONF and consider that this will not compromise the 'key landscape values'³ of the Slope Hill ONF as defined in the notified version of the Slope Hill ONF Schedule.⁴ The UGB location that they support is depicted by the blue line in **Figure 1** below.
- 14 I note that both of the Glenpanel landscape expert comments in this regard stem from their understanding that water tanks are defined as 'urban development' under the Council's Proposed District Plan

¹ T Milne statement of evidence at paragraph 20.

² D Compton-Moen statement of evidence at paragraph 18(a).

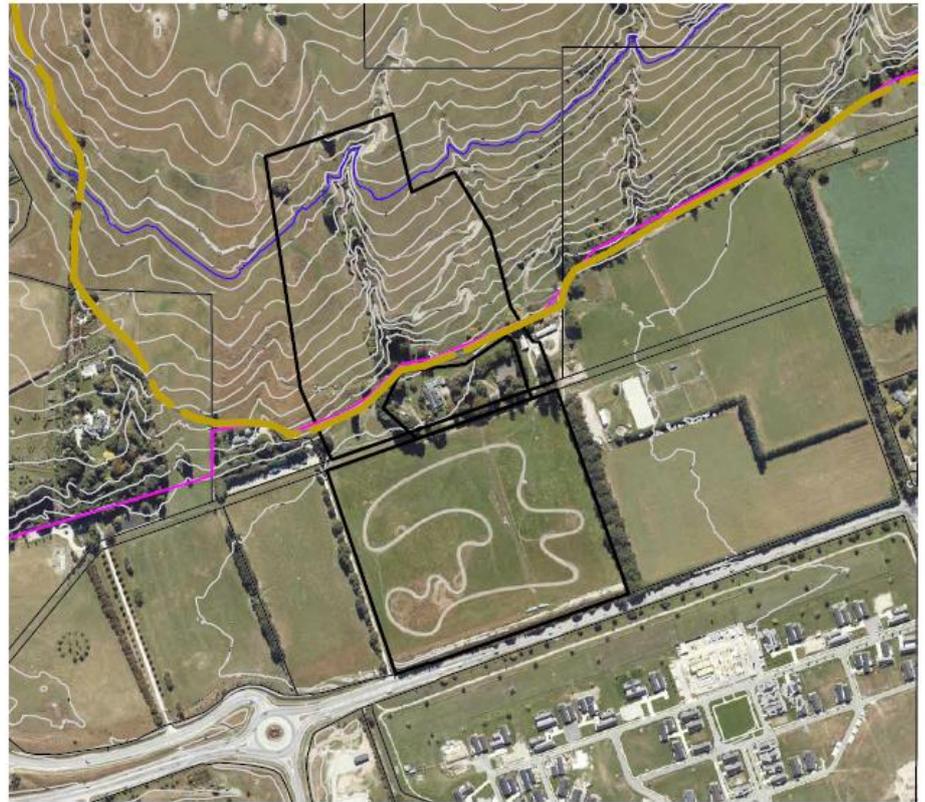
³ I discuss the appropriateness of this landscape policy test shortly under my discussion of the appropriateness of urban development within the ONF.

⁴ Refer Slope Hill ONF JWS 18 October 2023, Figure 2.

(PDP) and that the UGB needs to be located at this contour to provide a consenting pathway for water tank infrastructure.⁵

Proposed UGB Location

Legend	
	Flint's Park Site Boundary
	Ladies Mile Extent
	ONF Boundary
	423m Contour



Scale 1:4,000 @ A3
Contour Interval 5m

Figure 1: UGB location supported by Messrs Milne and Compton Moen. Blue line corresponds to 423m contour. Light brown line corresponds to PDP Landscape Classification Line (i.e. ONF) boundary. (Source: T Milne EiC Appendix C, page 7.)

Water tanks as urban development

15 Mr Jeff Brown's rebuttal evidence on behalf of the Council addresses the consenting pathway for water tanks under the PDP.⁶ Mr Brown explains that in his view:

⁵ T Milne statement of evidence at paragraph 42.

⁶ J Brown rebuttal evidence at paragraphs 185 – 189.

- (a) water tanks would be ‘utilities’ by definition (rather than ‘urban development’ as opined by Werner Murray); and
 - (b) such development would be treated as a permitted, controlled or discretionary activity in the Slope Hill ONF, depending on the final design.
- 16 I also note that the Slope Hill ONF JWS records our agreement that we “do not consider that water tanks in their own right, read as urban development”⁷ which is reiterated at paragraph 25 of Mr Compton-Moen’s evidence.
- 17 Relying on Mr Brown’s planning evaluation in his rebuttal evidence, I do not consider that it is necessary to realign the UGB to incorporate the (potential) location of the water tanks.
- 18 I have also re-read *Bridesdale Farm Developments Limited*, in which the Court stated that UGBs are a tool for managing growth within distinct and defensible areas.⁸ Therefore, I remain of the opinion expressed in the Slope Hill ONF JWS that moving the UGB to overlap the ONF does not align with the intentions of PDP Objective 4.2.1.

Appropriateness of urban development across the lower southern slopes of Slope Hill ONF

- 19 Messrs Milne and Compton-Moen are of the view that the lower southern slopes of Slope Hill ONF display different landscape values to the mid and upper slopes, which support a tolerance for urban development within the lower slopes of the ONF.⁹
- 20 Messrs Milne and Compton-Moen’s evidence states that the reduced visual prominence of this part of the ONF (or less visually exposed nature) and more modified context of the lower southern slopes of the ONF support their conclusions in this regard. Further, it is their view that urban development throughout the lower southern slopes in the

⁷ Slope Hill ONF JWS, Attachment A at page 3 paragraph h.

⁸ *Bridesdale Farm Developments Limited v Queenstown Lakes District Council* [2021] NZEnvC 189 at [83](d).

⁹ For example, see: T Milne statement of evidence at paragraphs 32, 35, 36, 38; D Compton-Moen statement of evidence at paragraphs 19, 22, 23.

vicinity of the Glenpanel Homestead will protect the 'key landscape values' of the Slope Hill ONF.

- 21 I disagree. In my opinion the Glenpanel landscape experts have:
- (a) Incorrectly framed the landscape values of the southern slopes of the ONF;
 - (b) Underestimated the landscape effects of urban development within the ONF (including the application of an incorrect definition for landscape capacity); and
 - (c) Applied an incorrect landscape policy test.
- 22 I discuss these points further as follows.

Existing landscape values

- 23 The Slope Hill ONF JWS records our agreement that the rebuttal version of the Slope Hill ONF Schedule is "largely appropriate at the scale of Slope Hill ONF as a whole".¹⁰
- 24 In my opinion, (and unlike Mr Milne¹¹), the rebuttal version of the Slope Hill ONF Schedule does not identify substantively different landscape values between the lower and mid/upper southern slopes (nor a differing landscape capacity between these parts of the Slope Hill ONF). While I acknowledge that built development (including tracks) and exotic vegetation associated with farming activity is typically located in the lower to mid slopes on the southern side of the landform feature, I consider that the lower, mid and upper slopes of the ONF read as a contiguous and coherent landform feature as a consequence of the underlying roche moutonnée geomorphology and the generally consistent pastoral land use patterns across the area.
- 25 I consider the fact that the southern slopes have not been modified by residential development is also a factor in this regard, as it reinforces the distinctive landscape boundary between the more modified and 'inhabited' landscape character associated with the pastoral flats of Ladies Mile and the seemingly undeveloped landscape character of the steeply sloping southern flanks of the

¹⁰ Slope Hill ONF JWS, Attachment A at page 1 paragraph a.

¹¹ T Milne statement of evidence at paragraph 53.

Slope Hill ONF. I also note that this part of Slope Hill ONF is one of the few glacial landforms within the Whakatipu Basin that has not been modified by residential development along its edges (i.e. unlike the southern slopes of Ferry Hill and Queenstown Hill, northern slopes of part of Morven Hill).

- 26 Further, the idea of a ‘variance’ in landscape values (and landscape capacity) between the lower and mid/upper southern slopes was raised in submissions on the Slope Hill ONF Schedule through the Priority Area Schedules Plan Variation process, but was not supported or discussed in expert landscape evidence.

Landscape effects of urban development on Slope Hill ONF

- 27 In their statements of evidence, Messrs Milne and Compton-Moen’s discussion of landscape effects largely focuses on consideration of visual effects and effects on shared and recognised values.¹²
- 28 I note that the approach of focusing on visibility characteristics and effects as a surrogate for landscape effects is identified as a potential pitfall in *Te Tangi a te Manu*.¹³
- 29 Put another way, concluding that, in this instance, urban development is appropriate because it will be screened in some views by intervening development is an oversimplification of effects on landscape values.
- 30 In my opinion, such an approach overlooks the effects of development on the core landform (or physical) attributes and values associated with the ONF.
- 31 Further, in my experience, it is these core landform attributes and values that underpin the perceptual and associative landscape values of all of the RMA s 6(b) features and landscapes in the district which means that, if anything, consideration of effects on this aspect of landscape values is fundamental.¹⁴

¹² For example, see T Milne statement of evidence at paragraph 54 and 55(c),(d); D Compton-Moen statement of evidence at paragraph 18(c).

¹³ *Te Tangi a te Manu*, Aotearoa New Zealand Landscape Assessment Guidelines: [6.28].

¹⁴ My evidence in chief addresses the broader spectrum of landscape effects at paragraphs 55, 57, 58, 60 and 73.

Landscape policy test

- 32 I also consider that Messrs Milne and Compton-Moen have applied an incorrect landscape policy test in support of their conclusions with respect to the appropriateness of urban development within the lower southern slopes of the Slope Hill ONF which may have skewed their conclusions.
- 33 Relevant PDP policies¹⁵ reference the protection of 'landscape values' rather than 'key landscape values' (as alleged by the Glenpanel landscape experts). In my opinion, this widens the scope of effects consideration beyond the 'visibility' and 'shared and recognised values' focused on in the evidence of Messrs Milne and Compton-Moen, to the full range of landscape values associated with the area.
- 34 I remain of the view set out in my evidence in chief that urban development across the lower southern slopes of the ONF would detract from (or not protect), the impression of Slope Hill as a seemingly undeveloped distinctive and highly legible, roche moutonnée landform feature, in which built development is very limited and is subservient to the natural landscape elements, patterns and processes. More specifically, I consider that urban development across the lower southern slopes would not protect the following identified landscape values described in the rebuttal version of the Slope Hill ONF Schedule (at **Appendix A** refer to paragraphs 1, 2, 16, 18, 19, 22, 23, 24, 25, 26, 29, 30, 31, 33).
- 35 In reaching my conclusions on this aspect, I acknowledge that the intervening urban development anticipated by the TPLM Variation will alter the qualities of values described at paragraph 18, 19 and 23 of the Slope Hill ONF Schedule. However, as explained in my evidence in chief, I consider that the proposed TPLM Variation provisions recognise the importance of these characteristics and values via 27.3.24.4, 49.1.1.1 and 49.5.41.4(c), such that these landscape values will remain relevant for Slope Hill ONF to at least some degree.

¹⁵ For example, 3.3.30, 6.3.3.1(a), 21.2.1(a), 21.21.2.6.

36 I also note that Mr Milne has applied an incorrect definition with respect to ‘landscape capacity’ which, again, may have skewed his conclusions in this regard. PDP 3.1B.5(b)(i) defines ‘landscape capacity’ in relation to an Outstanding Natural Feature or Outstanding Natural Landscape, as the “capacity of a landscape or feature to accommodate subdivision and development without compromising its identified landscape values”.

37 The definition of landscape capacity applied by Mr Milne¹⁶ as being “the amount of change that a landscape can accommodate without substantially altering or compromising its existing character or values”, suggest a higher (and in my view, incorrect) threshold for landscape effects.

Slope Hill ONF boundary

38 In their discussion of the landscape effects of urban development within the Slope Hill ONF, Messrs Milne and Compton-Moen raise two additional matters:

(a) The observation¹⁷ that the New Zealand Geopreservation Inventory mapping for Slope Hill does not align with the PDP ONF mapping.¹⁸

(b) Their opinion that finer grain assessment of the landscape may determine what they consider to be a more appropriate ONF boundary.¹⁹

NZ Geopreservation Inventory mapping

39 I confirm that I was aware of this mapping at the time of preparing my evidence in chief for the TPLM Variation (and as part of my work on the Priority Area Schedules Plan Variation).

40 I have worked closely with Dr Bruce Hayward who is the convenor of the NZ Geopreservation Inventory on a number of district and region wide landscape projects throughout New Zealand. These include the

¹⁶ T Milne statement of evidence at paragraph 47.

¹⁷ See T Milne statement of evidence at paragraph 59 and D Compton-Moen statement of evidence at paragraph 21.

¹⁸ See T Milne statement of evidence at Figure 4 for the NZ Geopreservation Inventory mapping.

¹⁹ For example, see: T Milne statement of evidence at paragraph 56; D Compton-Moen statement of evidence at paragraph 18(a).

identification of ONFs (and ONLs) in Tasman, Waitomo District, Whangarei District, along with the consideration of effects of plan changes and resource consent proposals in relation to the Auckland ONFs (which draw from Dr Hayward's geological analysis).

- 41 Relying on this experience, it is my understanding that the NZ Geopreservation Inventory mapping:
- (a) Is effectively, a 'first cut' mapping resource that has been compiled by a wide range of geological experts across the country over an extended period of time, with no consistent assessment or mapping methodology being applied to that work.²⁰
 - (b) Inevitably requires refinement to accord with the approach to landscape assessment outlined in TTatM due to the broader range of considerations required of that assessment process.
- 42 For these reasons, I do not consider that the difference between NZ Geopreservation Inventory mapping of Slope Hill and the PDP Slope Hill ONF mapping to be of concern (or relevance).

Finer grain landscape assessment

- 43 Relying on my experience of consideration of a wide range of RMA s6(b) landscapes and features in the district, I acknowledge that in some instances, the alignment of ONF or ONL boundaries can seem arbitrary and a finer grain landscape assessment (including input from other expert disciplines) may determine a more appropriate boundary. However, I do not consider this to be the case for the southern side of Slope Hill ONF due to the alignment of the ONF boundary along the base of highly legible roche moutonnée landform.
- 44 I also note that the Slope Hill ONF boundary was supported by Dr Marion Read (landscape architect) in PDP Stage 1 hearing and confirmed by the Environment Court (in the Topic 2 decisions). Further, the original identification (and mapping) of Slope

²⁰ It is however noted, that as part of the RMA Reform work, Dr Hayward has drafted an assessment methodology for such work. I am aware of this material in my role as part of a NZILA working group that prepared a submission on behalf of the Institute in relation to the RMA Reform (and where I was charged with liaising with the NZ Geopreservation Society), and in my role as part of a small team of NZILA senior professionals liaising directly with MfE on landscape aspects of the proposed National Planning Framework.

Hill as an ONF (C180/99), applied the *modified Pigeon Bay factors* which underpin current TtM landscape assessment methods and includes consideration of geomorphology, ecology etc.

- 45 These reasons reinforce my disagreement with Messrs Milne and Compton-Moen that a finer grained assessment may determine a more appropriate ONF boundary along the south side of Slope Hill.

Response to Evidence of Philip Blakely on behalf of the Blakely Wallace Family

- 46 At paragraphs 15 – 16 of his evidence, Mr Blakely states that buildings up to 24m in the foreground of Slope Hill would impact on the values of the Slope Hill ONF.
- 47 I do not agree for the reasons set out at paragraphs 30 – 34 of my evidence in chief. I consider that the TPLM Provisions, and the fact that development will occur outside of the ONF will ensure that the Slope Hill ONF will not be adversely affected.

Bridget Mary Gilbert

24 November 2023

Appendix A: Slope Hill Priority Area ONF Schedule 21.22.6 Rebuttal Version

21.22.6 PA ONF Slope Hill: Schedule of Landscape Values

Key

~~Black strikethrough text~~: Text deletion recommended in 42A Report.

Black underlined text: Text addition recommended in 42A Report.

Black comment box text: Submission references for text changes recommended in 42A Report.

~~Red strike through text~~: Text deletion recommended in Council Rebuttal.

Red underlined text: Text addition recommended in Council Rebuttal.

Red comment box text: Provides a brief explanation of text changes requested in Submitter Evidence, with Council expert response (in some instances cross referencing to Rebuttal Evidence for a full explanation).

BG: Bridget Gilbert.

JE: Jeremy Head.

RE: Ruth Evans.

General Description of the Area

The Slope Hill PA ONF encompasses the elevated roche moutonnée landform of Slope Hill.

Physical Attributes and Values

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

Important landforms and land types:

1. The roche moutonnée glacial landform of Slope Hill, formed by the over-riding Wakatipu glacier, with a smooth 'up-glacier' slope to the southwest and a steeper rough 'plucked' (down-glacier) slope to the east adjacent to Lake Hayes. Rock outcrops throughout the elevated north-western flanks. Highest point: 625m.
2. The Slope Hill roche moutonnée is recognised in the NZ Geopreservation Inventory as one of the best examples of this type of landform in Otago and one of the most easily seen and accessible. It is identified as a site of national scientific, aesthetic and recreational values and is considered to be vulnerable to significant damage by human related activities.

Important hydrological features:

3. Three steep (unnamed) stream gullies draining the southern faces of Slope Hill.
4. A gully draining the north-eastern side.
5. A small kettle lake on the elevated south-western flanks.
6. The irrigation race along the western flanks.

Important ecological features and vegetation types:

7. Particularly noteworthy indigenous vegetation features include:
 - a. Remnant native vegetation comprising matagouri shrubland in the stream gullies and on some adjacent slopes on Slope Hill.

8. Other distinctive vegetation types include:
- Grazed pasture with scattered shelterbelts and clusters of exotic shade trees throughout the elevated slopes.
 - Amenity and shelter plantings around the two dwellings and wetland on the north side.
 - Poplar plantings around the flanks.
9. Animal pest species include feral cats, hares, rabbits, ferrets, stoats, weasels, possums, rats and mice.

9a. Exotic plant pests such as willow, hawthorne and broom in gullies.

Commented [BG1]: OS 82.21 Milstead Trust.
OS 140.18 Maryhill Ltd.

Important land-use patterns and features:

10. Slope Hill PA ONF is predominantly in pastoral use with very limited rural living use. Modification is limited to a network of farm tracks across the landform, other infrastructure (eg water tanks, fencing, utilities), a trig point and communication tower on the highpoint and two dwellings and associated farm buildings on the northern sides of Slope Hill. Built development is generally characterised by very carefully located and designed buildings, accessways, and infrastructure, which is well integrated by a mix of established and more recent vegetation features and reads as being subservient to the 'natural' landscape patterns.

Commented [BG2]: OS 59.10 Anna Hutchinson Family Trust.
OS 59.11 Anna Hutchinson Family Trust.

Commented [BG3]: OS 139.36 Grant Stalker Family Trust.

Commented [BG4]: OS 82.16 Milstead Trust.

10a Other neighbouring landuses which have an influence on the landscape character of the area due to their scale, character and or proximity include: the rural living development throughout the western, southern and northern lower flanks of the roche moutonnée, outside the PA.; and the existing or anticipated urban development associated with the Ladies Mile area; and the historic Glenpanel Homestead (listed Item 22) adjacent the south side of the PA.

Commented [BG5]: OS 82.14 Milstead Trust.
OS 139.9 Grant Stalker Family Trust.
OS 140.6 Grant Stalker Family Trust.

Commented [BG6]: OS 139.1 Grant Stalker Family Trust.
OS 139.8 Grant Stalker Family Trust.
OS 139.9 Grant Stalker Family Trust.
OS 140.6 Grant Stalker Family Trust.

Commented [BG7]: Change made by BG in response to Blair Devlin EIC for Milstead Trust (OS 82) .
Blair Devlin

Important archaeological and heritage features and their locations:

11. No historic heritage features, heritage protection orders, heritage overlays or archaeological sites have been identified/recorded to date within the ONF.

Mana whenua features and their locations:

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

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.

Important historic attributes and values:

14. Slope Hill has contextual value for its association with Threeewood Farm, one of the Wakatipu Basin's earliest farms.

Commented [BG8]: Blair Devlin EIC for Milstead Trust (OS 82) requests reference be added to the Glenpanel Homestead here. Given the homestead is outside the PA, BG considers that this reference is better located under 10(a) above.

Important shared and recognised attributes and values:

15. The descriptions and photographs of the area in tourism publications.

Perceptual (Sensory) Attributes and Values

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

Legibility and expressiveness attributes and values:

16. The area's natural landforms, land type, and hydrological features (described above), which are highly legible and highly expressive of the landscape's formative glacial processes.
17. Indigenous gully plantings which reinforce the legibility and expressiveness values within the gullies on Slope Hill.

Particularly important views to and from the area:

18. Highly attractive framed mid-range views eastbound on SH6, west of the Shotover Bridge to the south-western smooth 'up ice' flanks of Slope Hill. The composition comprises an attractive patterning of the Shotover River terraces and their layered tree plantings (a mix of evergreen and exotic species including Lombardy poplars) below the highly legible and more 'natural' pastoral elevated slopes of the roche moutonnée and backdropped by (often) snow-capped mountain ranges of Cardrona and the Crown Range. The large-scale road cuttings that frame the highway add to the structure and distinctiveness of the vista. Overall, the outlook impresses as an engaging and memorable gateway to the Wakatipu Basin and seemingly more spacious 'rural' landscape beyond Queenstown/Frankton.
19. Appealing mid to long-range views westbound on SH6 on the elevated section of the highway east of the intersection with Arrowtown Lake Hayes Road to the south-eastern flanks of Slope Hill. The open pastoral character of the rough 'plucked' slopes of the landform in this view forms a bold contrast with the exotic vegetation and building-dominated low-lying terraces of Ladies Mile and Frankton to the left of view. From this orientation, the roche moutonnée blends seamlessly with the layered patterning of dramatic mountains and roche moutonnée that frame the western side of the Wakatipu Basin and Lake Wakatipu more generally. The depth of the outlook together with its 'classic' elements that include a structured layering of mountainous landforms and the gateway impression (enabling first glimpses of Queenstown) contribute to the memorability of the vista. It is possible that anticipated urban development throughout Ladies Mile may obscure views of the lower margins of the landform feature, adjacent Ladies Mile.
20. Highly attractive close to long-range views from the Lake Hayes Trail / Wai Whaka Ata, the necklace of reserves around the edge of Lake Hayes, Arrowtown Lake Hayes Road and the residential area properties around Waiwhakaata (Lake Hayes) (outside the ONF), across the lake (ONF) to the dramatic and generally undeveloped roche moutonnée, the undeveloped ridgeline framing the western side of the lake and/or the more distant surrounding mountain backdrop.
21. Attractive mid to long-range views from the eastern western side of the Wakatipu Basin (including Tuckers Beach, Domain Road, Hawthorn Triangle, Dalefield, parts of the Shotover River corridor, the Hawthorn Triangle, the eastern end of Slope Hill Road and parts of the Queenstown Trail) to parts of the smooth pastoral elevated south-western flanks and the more rugged north-western flanks. From this these orientations, the open and generally undeveloped landform forms a marked contrast with the rural living development context in the foreground of view.
22. Attractive long-range views from the Remarkables Ski Field Access Road (and lookouts), the Queenstown Trail on Christine's Hill and from Arrowtown Lake Hayes Road at McIntyre's Hill to Slope Hill beside the highly attractive glacial lake of Waiwhakaata (Lake Hayes) and viewed within a broader ONL mountain context.
23. Attractive close, mid, and long-range views from Ladies Mile, Lake Hayes Estate and Shotover Country to the south side of Slope Hill. From this orientation the distinguishing roche moutonnée landform profile

Commented [BG9]: OS 139.28 Grant Stalker Family Trust.

Commented [BG10]: OS 140.25 Maryhill Ltd.
OS 139.69 Grant Stalker Family Trust.

Commented [BG11]: OS 139.42 Grant Stalker Family Trust.

Commented [BG12]: OS 139.42 Grant Stalker Family Trust.

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is clearly legible and there is an awareness of the transition from the smooth 'ice up' character to the rough 'plucked' character. It is possible that anticipated urban development throughout Ladies Mile may obscure views of the lower margins of the landform feature, adjacent Ladies Mile.

Commented [BG15]: OS 139.28 Grant Stalker Family Trust.

- 24. In all of the views, the dominance of 'natural' landscape elements, patterns, and processes evident within the ONF, along with the generally subservient nature of built development within the ONF and the contrast with the surrounding 'developed' landscape character, underpins the high quality of the outlook.

Naturalness attributes and values:

- 25. The seemingly 'undeveloped' character of Slope Hill which conveys a relatively high perception of naturalness. While modifications related to its pastoral use are visible, the very low number of buildings, the relatively modest scale of tracks and limited visibility of infrastructure (excepting the airport radar structure on the top of the landform) kerbs their influence on the character of the landform as a natural landscape element.

Commented [BG16]: Blair Devlin EIC for Milstead Trust (OS 82) requests the word 'plainly' is added before 'visible'. BG is of the view that this additional text is unnecessary and does not benefit an understanding of landscape values.

Commented [BG17]: Change made in response to Blair Devlin EIC for Milstead Trust (OS 82), with minor modification.

Memorability attributes and values:

- 26. The appealing and engaging views of the largely undeveloped and legible roche moutonnée landform of Slope Hill. The close proximity of Waiwhakaata (Lake Hayes) ONF in the outlook, collectively seen within a relatively developed immediate context serves to enhance the memorability of the outlook.

Transient attributes and values:

- 27. Autumn leaf colour and seasonal loss of leaves associated with the exotic vegetation.
- 28. Seasonal snowfall and the ever-changing patterning of light and weather across the roche moutonnée slopes.

Aesthetic qualities and values:

- 29. The experience of the values identified above from a wide range of public viewpoints.
- 30. More specifically, this includes:
 - a. The highly attractive large-scale composition created by the generally undeveloped and distinctive roche moutonnée landform, juxtaposed beside a rural living and urban context.
 - b. At a finer scale, the following aspects contribute to the aesthetic appeal:
 - i. the clearly legible roche moutonnée landform profile and character;
 - ii. the open and pastoral character of Slope Hill;
 - iii. the very limited level of built modification evident through the ONF; and
 - iv. the poplars around the flanks of Slope Hill, which contribute to the scenic appeal despite not being native.

Summary of Landscape Values

Physical • Associative • Perceptual (Sensory)

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

very low	low	low-mod	moderate	mod-high	high	very high
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The combined physical, associative, and perceptual attributes and values described above for PA ONF Slope Hill and Lake Hayes Remarkables can be summarised:

- 31. **Very High physical values** due to the high-value landforms, vegetation features, habitats, species, hydrological features and mana whenua features in the area.
- 32. **High associative values** relating to:
 - a. The mana whenua associations of the area.
 - b. The historic associations of the area.
 - c. The strong shared and recognised values associated with the area.
 - d. ~~The significant recreational attributes of Waiwhakaata (Lake Hayes).~~
- 33. **Very High perceptual values** relating to:
 - a. The high legibility and expressiveness values of the area deriving from the visibility and abundance of physical attributes that enable a clear understanding of the landscape's formative processes.
 - b. The very high aesthetic and memorability values of the area as a consequence of its distinctive and appealing composition of natural landscape elements. The visibility of the area from Lake Hayes Estate, Shotover Country, the Ladies Mile corridor, the eastern side of the Wakatipu Basin, the scenic route of SH6, Arrowtown Lake Hayes Road, the Remarkables Ski Filed Access Road and the Queenstown Trail, along with the area's transient values, play an important role.
 - c. The identity of the roche moutonnée as a natural landscape backdrop to Ladies Mile and the western and central portion of the Wakatipu Basin and as a gateway feature to Queenstown/ the Wakatipu Basin.
 - d. A high perception of naturalness arising from the dominance of natural landscape elements and patterns at Slope Hill.

Commented [BG18]: OS 139.56 Grant Stalker Family Trust. OS 140.57 Maryhill Ltd.

Landscape Capacity

The landscape capacity of the PA ONF Slope Hill for a range of activities is set out below.

- 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 camouflaging benefit of natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; and enhance public access, and protect the area's ONF values.
- ii. **Visitor accommodation and tourism related activities – ~~no landscape capacity.~~ very limited** landscape capacity for visitor accommodation associated with existing dwellings and consented platforms which: are located to optimise the screening and/or filtering benefit of natural landscape elements; are designed to be small scale and have a 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). No landscape capacity for visitor accommodation elsewhere in the PA. No landscape capacity for tourism related activities within the PA.
- iii. **Urban expansions – no** landscape capacity.
- iv. **Intensive agriculture – no** landscape capacity.

Commented [BG19]: Blair Devlin and Nicola Smetham for Milstead Trust (OS 82) request that the word 'future' is added before 'activities'. BG considers that this change is unnecessary, as any rating of landscape capacity is inevitably 'future focussed' - refer 3.1B.5 and Schedule 21.22 Preamble.

Commented [BG20]: Blair Devlin for Milstead Trust (OS 82) requests several amendments to the landscape capacity ratings to align with the landscape capacity rating scale recommended by Mr Ben Espie. BG discusses the merits of Mr Espie's landscape capacity rating scale in her Rebuttal Evidence. For the reasons set out in her Rebuttal Evidence, BG does not agree with the changes requested by Mr Devlin in this regard.

Commented [BG21]: OS 77.5 Kai Tahu ki Otago.

Commented [BG22]: Consequential amendment arising from OS 74.2.

Commented [BG23]: OS 74.2. John May and Longview Environmental Trust.

Commented [BG24]: OS 139.62 Grant Stalker Family Trust.

- v. **Earthworks** – **very limited** landscape capacity for earthworks associated with farm or public access tracks, that protect naturalness and expressiveness attributes and values, and are sympathetically designed integrate with existing natural landform patterns.
- vi. **Farm buildings** – ~~in those areas of the ONL with pastoral land uses,~~ **very limited** landscape capacity for modestly scaled buildings that reinforce existing rural character.
- vii. **Mineral extraction** – **no** landscape capacity ~~excepting very small-scale farm quarries.~~
- viii. **Transport infrastructure** – **very limited** landscape capacity for trails that are: located to integrate with existing networks; designed to be of a sympathetic appearance and character; integrate landscape restoration and enhancement; and protect the area's ONF values. **No** landscape capacity for other transport infrastructure.
- ix. **Utilities and regionally significant infrastructure** – **limited** landscape capacity for infrastructure that is buried or located such that they are screened from external view. In the case of the National Grid and utilities such as overhead lines, or cell phone towers, or navigational aids and meteorological instruments, where there is a functional or operational need for its location, structures are to be designed and located to limit their visual prominence, including associated earthworks, which cannot be screened, these should be designed and located so that they are not visually prominent.
- x. **Renewable energy generation** – **no** landscape capacity ~~for commercial scale renewable energy generation.~~ **Very limited to no Extremely limited** landscape capacity or discreetly located and small-scale renewable energy generation.
- xi. ~~Production~~ **Forestry** – **no** landscape capacity ~~for exotic forestry.~~
- xii. **Rural living** – ~~Very limited to no Extremely limited~~ landscape capacity ~~for rural living development which: is located to optimise the screening and/or filtering benefit of natural landscape elements; is designed to be small scale and have a 'low-key' rural character; integrates landscape restoration and enhancement (where appropriate); and enhances public access (where appropriate).~~

Commented [BG25]: OS 139.66 Grant Stalker Family Trust. OS 140.67 Maryhill Ltd.

Commented [BG26]: Change made by BG, relying on OS 114.3 (Woodlot Properties Limited) and ors.

Commented [BG27]: OS 70.18 Transpower New Zealand Limited. OS 86.9 Melissa Brook

Commented [BG28]: Change made by BG, relying on OS 114.3 (Woodlot Properties Limited) and ors.

Commented [BG29]: OS 140.7 Maryhill Limited.

Commented [BG30]: Typographical correction.

Commented [BG31]: Change made by BG, relying on OS 67.28 (UCESI).

Commented [BG32]: Change made by BG, relying on OS 114.3 (Woodlot Properties Limited) and ors.

Commented [BG33]: OS 139.68 Grant Stalker Family Trust.

Appendix B: Priority Area Schedules Hearing Slope Hill ONF Schedule 21.22.6
– Landscape Joint Witness Statement

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the Resource Management Act 1991

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

**JOINT WITNESS STATEMENT OF LANDSCAPE EXPERTS ON 21.22.1 PA ONF
PENINSULA HILL AND 21.22.6 PA ONF SLOPE HILL**

[4 October 2023]



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INTRODUCTION

1. Queenstown Lakes District Council (**Council**) notified a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23 (**the Variation**).
2. This Joint Witness Statement (**JWS**) follows on from the Hearing Panel's 4 August Minute and the 20 August memorandum filed on behalf of the Council. This JWS outlines the experts' agreement or disagreement on the following issues:
 - 2.1 21.22.6 PA ONF Slope Hill Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Nikki Smetham (landscape) on behalf of the Milstead Trust Limited.
 - 3.2 Bridget Gilbert (landscape) on behalf of Queenstown Lakes District Council.
4. The qualifications and relevant experience of the experts are set out in the evidence filed by the experts in relation to the Variation.
5. In preparing this JWS the experts have relied upon the following material:
 - 5.1 The documents set out in our evidence in chief and, in the case of Ms Gilbert, her rebuttal evidence.

CODE OF CONDUCT

6. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

POINTS OF AGREEMENT

7. The experts agree that the rebuttal version of **21.22.6 PA ONF Slope Hill** is largely appropriate, subject to the recommended change to the use of the no landscape capacity

rating terminology agreed between the planning and landscape experts, at the conferencing session on 3 October¹.

POINT OF DISAGREEMENT

8. The only point of disagreement between the experts relates to the articulation of the Summary of Physical Landscape Values.
9. As stated in the JWS from the landscape conferencing that took place on Monday 2 October 2023, Ms Smetham is of the opinion that this PA Schedule (and all of the PA Schedules) should include the specific 'physical' landscape values in the Summary of Landscape Values that are key to this / or a particular ONF/L, and require protection in accordance with the policy direction, notwithstanding the necessity to read the PA Schedule/s in its entirety. In her opinion the associative and perceptual values and attributes are intertwined and cannot be readily separated.
10. Ms Gilbert is of the opinion that the PA Schedules comprise a summary of landscape attributes and values. In her view, all of the high value landscape attributes and values described in the Physical Values section of schedule are of relevance (as signalled in the Summary of Physical Values text). Given that the PA Schedule is a technical document that will primarily be referenced and interpreted by landscape experts (to assist decision makers), Ms Gilbert is of the view that landscape experts will understand which of those entries relate to high value physical landscape attributes and values. This means that no restructuring is required in this regard.
11. In addition, the Physical Values section of each PA Schedule is informed by other expert disciplines including geomorphologists and ecologists, with those experts supporting the wording (and structuring) of the PA Schedule as proposed in the notified version.
12. Further, in Ms Gilbert's view, the summarising of key landscape values is likely to undermine the acknowledgement by the experts (in the landscape conferencing session on Monday 2

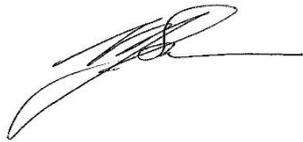
¹ i.e. 'no landscape capacity' rating terminology is changed to: **Extremely limited or no landscape capacity**: *there are extremely limited or no opportunities for development of this type. Typically this corresponds to a situation where development of this type is likely to materially compromise the identified landscape values. However, there may be exceptions where occasional, unique or discrete development protects identified landscape values.*

October), that the PA Schedules (including 21.22 6) are intended to be read in their entirety to inform an understanding of landscape values in relation to each PA.

DATED this 5th day of October 2023

Bridget Gilbert

Bridget Gilbert



Nikki Smetham