

**BEFORE THE INDEPENDENT HEARINGS
PANEL**

IN THE MATTER of the Resource Management Act 1991 (the **Act**)

AND

IN THE MATTER of the Variation to the Priority Area Landscape Schedules
(**Variation**) to the Queenstown Lakes District Council
Proposed District Plan (**PDP**)

**PRIMARY STATEMENT OF STEPHEN KENNETH BROWN ON BEHALF OF
QUEENSTOWN PARK LIMITED**

Dated: 12th September 2023

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BROOKFIELDS
LAWYERS

1. INTRODUCTION

1.1 My name is Stephen Kenneth Brown.

1.2 I am giving evidence in these proceedings on behalf of Queenstown Park Limited (QPL) in relation to the Northern Remarkables ONL Priority Area (PA).

2. QUALIFICATIONS AND EXPERIENCE

2.1 I hold a Bachelor of Town Planning degree and a post-graduate Diploma in Landscape Architecture. I am a Fellow and past president of the New Zealand Institute of Landscape Architects and have practised as a landscape architect for 42 years. During that period, the great majority of my professional practice has focussed on landscape assessment and planning. This has included undertaking, managing and participating in a wide variety of strategic landscape assessments, including the following:

- the West Coast Region - Buller / Grey / Westland Districts: Landscape & Natural Character (2012);
- Buller District: Landscape & Natural Character (2010/2011) – for Meridian Energy Ltd in relation to the Mokihinui River appeals;
- the Auckland Region: Volcanic Viewshafts (2002-3 & 2013-16);
- the Auckland Region: Height Sensitive Areas (2012-16);
- the Waikato Region: peer review of Outstanding Natural Landscapes (2011/12);
- the Auckland Region: Natural Character (2010 & 2012/13);
- the Auckland Region: Landscape (2001-8);
- Otorohanga District (2009/10);
- the Horizons (Manawatu Wanganui) Region: Landscape – for Mighty River Power in relation to the Turitea Wind Farm application (2009/10);
- the Thames Coromandel District: Landscape and Natural Character (2006-12 & 2019-20);
- the Kawhia and Aotea Harbour catchments: Landscape (2006);
- the Mahia Peninsula and Wairoa District: Landscape (2003);
- Waitakere City's Northern Strategic Growth Area Study: Landscape (2000);
- North Shore City: Landscape (1997-2000);
- Eastern Manukau City: Landscape (1995);
- Auckland's urban coastlines: Landscape (1995);

- Whangarei District: Landscape (1994 & 2005);
- the Far North District: Landscape (1994/5);
- Waiheke Island: Landscape (1988);
- the Auckland Region: Landscape (1982-4).

2.2 I have also undertaken a large number of effects assessments for development projects, including:

- The proposed expansion of the Port of Tauranga (Port of Tauranga Ltd);
- The Proposed expansion of Northport at Marsden Point (Northport Ltd);
- The Waterview Connection and North-western Motorway Upgrade Projects (Waka Kotahi);
- The Waitaki Power Scheme Reconsenting (Meridian Energy Ltd);
- Structure planning for the redevelopment of Wynyard Point (Eke Panuku);
- The Launch Bay Precinct development at Hobsonville Point (Winton Partners);
- The East-West Link (for Auckland Council);
- The Northern Corridor Improvements (for Auckland Council);
- Redevelopment of Eden Park for the Rugby World Cup 2011 (Eden Park Redevelopment Board);
- The Hagley Park Cricket Oval (Christchurch City Council);
- Project Mill Creek Wind Farm (Wellington City Council);
- Project Central Wind (Meridian Energy Ltd);
- Moorabool Wind Farm (WestWind Pty Ltd);
- Long Bay Structure Planning (ARC & North Shore City Council);
- Albany, Greenhithe & Okura Structure Plans (North Shore City Council);
- Structure planning for the Viaduct Basin (Ports of Auckland & Auckland City Council);
- Waitemata Harbour Crossings Options Assessment (Opus International & Waka Kotahi); and
- The Channel Tunnel Rail Corridors (UK Department of Transport).

2.3 Of relevance to this evidence, I provided landscape advice to QPL in relation to the proposed re-zoning of Queenstown Park Station which comprises a

significant proportion of the Northern Remarkables ONL PA. Through that process QPL sought to apply a resort zoning to its land to enable visitor focused activities and a gondola connecting to the Remarkables Ski Area along with environmental enhancements such as native revegetation and public walking trails. The re-zoning proposal was withdrawn by QPL at the Environment Court appeal stage and the land has retained its rural zoning. In the course of my involvement with this process, I have visited the Northern Remarkables PA on numerous occasions by foot, vehicle and helicopter. As such, I have an intimate understanding of its Landscape Values and Landscape Capacity.

3. CODE OF CONDUCT

- 3.1 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2023) (**Code**) and have complied with it in preparing this evidence. I also agree to follow the Code when presenting evidence to the hearing commissioners. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

4. SCOPE OF EVIDENCE

- 4.1 This statement of evidence covers QPL's submission points on:
- (a) The 21.22 Schedule of Landscape Values: Outstanding Natural Feature and Outstanding Natural Landscape Priority Areas.
 - (b) Landscape Values of 21.22.14 Northern Remarkables ONL PA.
 - (c) Landscape Capacity of 21.22.14 Northern Remarkables ONL PA.
 - (d) Landscape Values of 21.22.9 Kawarau River ONF PA.
 - (e) Landscape Capacity of 21.22.9 Kawarau River ONF PA.
- 4.2 Under the overarching topics of Landscape Values and Landscape Capacity, I have taken the approach of setting out the changes sought by QPL and the section 42A recommendation in relation to that relief as a starting point to my discussion on each subsidiary topic.

4.3 I have not been asked by QPL to comment on Mana Whenua values and this matter is outside the scope of my evidence.

5. 21.22 SCHEDULE OF LANDSCAPE VALUES: OUTSTANDING NATURAL FEATURE AND OUTSTANDING NATURAL LANDSCAPE PRIORITY AREAS

5.1 QPL's submission supported the covering statement to Schedule 21.22 and sought that it be retained as follows:

The landscape attributes and values identified, relate to the priority area as a whole and should not be taken as prescribing the attributes and values of specific sites.

The landscape attributes and values may change over time.

A finer grained location-specific assessment of landscape attributes and values would be required for any plan change or resource consent. Other landscape values may be identified through these finer grained assessment processes

The capacity descriptions are based on the scale of the priority area and should not be taken as prescribing the capacity of specific sites; landscape capacity may change over time; and across each priority area there is likely to be variations in landscape capacity, which will require detailed consideration and assessment through consent applications.

5.2 QPL submitted that these statements appropriately recognise that:

- (a) Landscape scale is an important consideration, particularly when addressing expansive priority areas that have discrete landscape units within them. Equally, it is unavoidable that descriptions of Landscape Values and Landscape Capacity will reference relatively specific parts of ONL and ONF;
- (b) Values are not static and may change over time without derogating from their protection. Such recognition is critical to enabling the planning framework to provide for development and landscape enhancement.
- (c) Fine grained assessment will be required to identify the particular Values engaged by a particular proposal and the same is true of the related Capacity. The schedule is therefore a consideration but not the end of a proposal specific assessment.

5.3 The Section 42A report recommends the following additions to the covering statement highlighted in blue:

21.22 Schedule of Landscape Values: Outstanding Natural Feature and Outstanding Natural Landscape Priority Areas Preamble

Purpose

Schedule 21.22 identifies and describes 24 Outstanding Natural Features (ONF) or Outstanding Natural Landscape (ONL) priority areas (PA), as set out in Strategic Policy 3.3.36.

The PA Schedules are a tool to assist with the identification of the landscape values that are to be protected within each ~~priority area~~ PA and related landscape capacity. They contain both factual information and evaluative content and are to inform plan development and plan implementation processes.

The description of each priority area must be read in full. Each description, as a whole, expresses at a high level, the landscape values and the attributes on which those values derive.

Landscape Attributes and Values

The landscape attributes and values identified, relate to the PA as a whole and should not be taken as prescribing the attributes and values of specific sites within the PA.

The PA Schedules refer to plant and animal pests. Plant and animal pests are a negative landscape value. Few, if any of Aotearoa's ONF/Ls are pristine, with varying levels of modification evident (including pests). This means that landscape restoration and enhancement (which can include the management of pests) is typically a highly desirable outcome. The inclusion of pest information is intended as helpful information to guide appropriate future landscape management within the PA. (For example, where a resource consent or plan change is proposed within the PA, the proposal or provisions may seek to specifically address the management of pests).

Given the relatively high level landscape scale of the PAs, A finer grained location-specific assessment of landscape attributes and values ~~would~~ will typically be required for plan development or plan implementation purposes (including ~~any~~ plan changes or resource consent applications). The PA Schedules are not intended to provide a complete record and ~~Other~~ location specific landscape values may be identified through these finer grained assessment processes.

Landscape Capacity

The landscape capacity ratings used in the PA Schedules, which are described below, are intended to reflect the capacity of the landscape or feature to accommodate various types or forms of development, without compromising the identified landscape values. The definition of landscape capacity applied in the PA Schedules is set out in 3.1B.5(b).

The capacity ratings, and associated descriptions, are based on an assessment of each PA as a whole, and should not be taken as prescribing the capacity of specific sites within a PA.

The descriptions in the PA Schedules are relatively 'high level' and focus on describing potential outcomes that would likely be appropriate within each PA. These descriptions are not a replacement for any relevant policies, rules or standards in the District Plan, and are intended to provide guidance only. Landscape capacity is not a fixed concept, and it may change over time as development occurs or landscape characteristics change. In addition, across each PA there is likely to be variation in

landscape capacity, which will require detailed consideration and assessment through future plan changes or resource consent applications.

For the purposes of the PA Schedules, landscape capacity is described using the following five terms:

Some landscape capacity: typically this corresponds to a situation in which a careful or measured amount of sensitively located and designed development of this type is unlikely to materially compromise the identified landscape values.

Limited landscape capacity: typically this corresponds to a situation in which the landscape is near its capacity to accommodate development of this type without material compromise of its identified landscape values and where only a modest amount of sensitively located and designed development is unlikely to materially compromise the identified landscape values.

Very limited landscape capacity: typically this corresponds to a situation in which the landscape is very close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only a very small amount of sensitively located and designed development is likely to be appropriate.

Very limited to no landscape capacity: typically this corresponds to a situation in which the landscape is extremely close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only an extremely small amount of very sensitively located and designed development is likely to be appropriate.

No landscape capacity: typically this corresponds to a situation where development of this type is likely to materially compromise the identified landscape values.

It is intended that the use of this five-tier landscape capacity terminology, along with a description of the characteristics that are likely to frame development that is appropriate (from a landscape perspective), and the description of the landscape attributes and values of the PA will assist in providing high level guidance with respect to the scale, location and characteristics of each landuse type that will protect landscape values in each PA ONF/L.

~~The capacity descriptions are based on the scale of the priority area and should not be taken as prescribing the capacity of specific sites; landscape capacity may change over time; and across each priority area there is likely to be variations in landscape capacity, which will require detailed consideration and assessment through consent applications.~~

The PA schedules have been prepared to reflect that the PA mapping extends beyond the Rural Zone. The application of the PA schedules is as follows:

- Other than the Ski-Area Sub Zone (see below), the PA schedules apply (as relevant) to any proposal requiring resource consent in the Rural Zone, including the Rural Industrial Sub Zone.
- The PA schedules apply (as relevant) to any activity in the Ski-Area Sub Zone that is not provided for by that sub-zone.

- The PA schedules do not directly apply to proposals in other zones, but may inform landscape assessments for proposals involving any land within a PA.

Activities listed in Policy 3.3.38

Activities listed have the same meaning as their defined term in Chapter 2. Where an activity is not defined by Chapter 2, the following meanings apply:

- Tourism related activities: has the same meaning as 'Resort' in Chapter 2.
- Urban expansions means:
 - a change from a rural activity to urban development; or
 - a change (including any proposed change) in zoning to an urban zone, including any change to the urban growth boundary or any other zone changes (or proposed changes) that would provide for urban development.
- Intensive agriculture: has the same meaning as 'Factory Farming' in Chapter 2.
- Mineral extraction: has the same meaning as 'Mining Activity in Chapter 2.
- Farm scale quarries: means mining of aggregate for farming activities on the same site.
- Renewable energy generation: has the same meaning as Renewable Electricity Generation and Renewable Electricity Generation Activities in Chapter 2.
- Forestry: has the same meaning as Forestry Activity in Chapter 2.
- Rural living: has the same meaning as rural living in Chapter 3 section 3.5B.5.

The range of landuse activities addressed in the capacity section of the PA Schedules corresponds to the series of activities known to be of relevance at the time of the drafting of the schedules. It is acknowledged that this does not span the full array of landuse activities that may be contemplated in the PAs over time. In the case of a future application for a land-use activity that is not addressed in a PA Schedule, an assessment of landscape attributes, values and capacity applying the principles set out in 3.3.43, 3.3.45 and 3.3.46 would be required.

- 5.4 The revised description of the PA Landscape Schedules, as proposed in the section 42A Report, accords with my own interpretation of them. In this regard, I think the explanation of the different Landscape Capacities is particularly useful and relevant when looking at each schedule as a whole. I also agree that any new land use not addressed in a PA Schedule would need to be assessed against the various attributes, values and principles identified for individual schedules.

6. NORTHERN REMARKABLES LANDSCAPE VALUES

Important ecological features and vegetation types

- 6.1 QPL's submission sought that "Red deer" should be qualified as "feral red deer" to recognise that farmed red deer are not a pest:

14. Animal pest species include feral red deer, feral goats, feral cats, ferrets, stoats, weasels, hares, rabbits, possums, rats and mice.

- 6.2 The Section 42A report recommends accepting this change.
- 6.3 I can only agree that farmed red deer should not be regarded as a pest species: indeed, as is implied in the s.42A Report, feral deer, goats, feral cats, ferrets, stoats, weasels, hares, rabbits, possums, rats and mice are all problematic in relation to the biological health of the PA.

Important land-use patterns and features

- 6.4 QPL's submission stated that the proposed attributes in respect of land use patterns fail to adequately reflect that Queenstown Park Station is a large intensively farmed landholding within the ONL and that the continued productive use of this land contributes to pest control and landscape enhancement. QPL's proposed wording is:

20. Queenstown Park Station is a large intensively farmed landholding within the ONL, the continued productive use of this land contributes to pest control and landscape enhancement.

- 6.5 The section 42A report recommends accepting this change.
- 6.6 QPL's proposed wording reflects the current situation across much of the PA. As such, the s.42A report recommendation 'rounds out' and helps to further explain the current state of the PA as a whole. Not all of it is farmed, but a significant part of the PA is, and I agree with the s.42A amendment proposed in this regard.

Important shared and recognised values

- 6.7 QPL's submission states that the description of the Northern Remarkables "as a 'key outlook' from Queenstown" confuses the Northern Remarkables with the iconic Western Remarkables and should be deleted.
- 6.8 QPL's proposed wording is:

34. The popularity of the mountain slopes as an inspiration/subject for art and photography ~~and as a 'key outlook' from Queenstown.~~

- 6.9 The Section 42A report did not recommend the deletion sought by QPL and instead recommended the additions in blue:

34. The popularity of the mountain slopes as an inspiration/subject for art and photography and as a 'key outlook' from Queenstown. The close proximity of the area to Queenstown and its visibility from much of the Whakatipu Basin and Whakatipu Waimāori (Lake Whakatipu) play an important role.

- 6.10 In my opinion, the western face of The Remarkables is central to most public impressions of The Remarkables and its picture-postcard qualities – with its broad expanse of open, scree slopes topped by jagged, crenelated peaks then a cap of ice and snow for most of the year. By contrast, the more jumbled and broken slopes of the Northern Remarkables have a more peripheral, supportive, role in relation to such views. Its slopes are more variable and broken by major stream valleys, and become more introverted as the Kawarau River valley extends eastwards – past Shotover Country and Lake Hayes Estate, then Bridesdale, towards Chard Farm and the mouth of the Gibbston Valley.
- 6.11 Consequently, I am supportive of the idea that there needs to be some differentiation between the more open and iconic, western slopes of The Remarkables and those that wrap around the Range's northern end to frame the Kawarau River valley. As such, it may well be appropriate to acknowledge that the western slopes and crest of The Remarkables (generally outside the PA) provide inspiration for art and photography, addressing them as a key feature in views from Queenstown. However, the Northern Remarkables (at the core of the PA) are generally less significant in this regard and secondary to the views just referenced. If this distinction is not recognised in the Landscape Schedule, then I agree with QPL that the current statement should be removed.

Remoteness and wildness attributes and values

- 6.12 QPL's submission sought that paragraph 61 of the Schedule recognise that the obvious influence of rural production is mostly on the South side of the river:

61. A strong sense of the sublime associated with the Northern Remarkables' main slopes, which contribute a sense of remoteness and wildness to their wider setting. Such feelings are less apparent near the valley floor, due to the more obvious influence of rural production, mostly on the South side and the presence of residential development along the northern edge of the ONL – most notably near Bridesdale, Lake Hayes Estate and Shotover Country. The valley corridor reveals significant landscape transition; from the sublime and predominantly natural, to the picturesque and cultural.

- 6.13 The Section 42A report does not recommend any changes to the existing statement.
- 6.14 I agree with most of paragraph 61 and, in particular, its description of the clear sense of transition from those, more elevated, parts of the Northern Remarkables and Kawarau River valley that display the ruggedness, naturalness, remoteness, and wilderness qualities more directly associated with the ONL's 'sublime qualities' contrasting with the greater rural production and residential modification found closer to the Kawarau River and its valley floor. I also agree that there is a distinction between the rural production found generally south of the river and the residential development that is concentrated north of it.
- 6.15 As a result, I am supportive of the insertion requested by QPL.

Summary of Landscape Values

- 6.16 QPL's submission stated that the summary of landscape values provides a rose tinted and inaccurate summary of the physical values of the area. QPL sought that the summary expressly recognise the pastoral and viticultural land uses scattered farm dwellings, rural buildings, shelterbelts, woodlots, power lines, fencing, and tracks, and exotic plant species extending from the river that are part of the ONL's physical values.
- 6.17 QPL's proposed wording is as follows:

64. **Very High physical values** due to the proliferation of high-value landforms, geological features along with the vegetation features, habitats, species, hydrological features and mana whenua features in the area, as well as pastoral and viticultural land uses scattered farm dwellings, rural buildings, shelterbelts, woodlots, power lines, fencing, and tracks, and exotic plant species near the river.

- 6.18 The Section 42A report does not recommend any changes to the existing statement.
- 6.19 Reflecting some of my commentary above, it is clear that most of the ONL derives its value from the range of features listed in the draft Schedule, including high-value landforms, vegetation features, habitats, etc. To this might be added the Kawarau River as a central feature of the Northern Remarkables ONL (even though it also sits within its own ONF) and local streams and their outwash fans – like the Rastus Burn – that also contribute appreciably to the character and values of the river corridor and lower Remarkables. This would, in my opinion,

better round out those attributes which contribute positively to the very high values of the ONL.

- 6.20 However, this leaves the issue of other attributes also found within the Kawarau River corridor that contribute to its character which cannot be ignored. One option in this regard would be to state that the attributes just described are, in places, counterbalanced by the presence of “*pastoral and viticultural land uses, scattered farm dwellings, rural buildings, shelterbelts, woodlots, power lines, fencing, and tracks, and exotic plant species near the river*” – as proposed by QPL. The other option would be to specifically identify these countervailing factors and describe their general location – ie. within the lower river valley both sides of the Kawarau River – as part of a separate paragraph focused on existing modification within the ONL. Such an addition could also explain that such factors only affect specific parts of the Northern Remarkables ONL and are generally subservient to, or secondary to, the factors that support the very high values identified.
- 6.21 I would support the adoption of either approach.

7. NORTHERN REMARKABLES LANDSCAPE CAPACITY

Commercial recreational activities

- 7.1 QPL’s submission supported the recognition of capacity for commercial recreation activities and sought that this be retained as follows:

67. **Commercial recreational activities – some** landscape capacity for activities (including at Chard Farm) that: integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of natural landscape elements; are designed to be of a sympathetic scale, appearance and character; integrate appreciable landscape restoration and enhancement; enhance public access; and protect the area’s ONL values.

- 7.2 The Section 42A report recommends additions to the existing wording as highlighted blue:

67. **Commercial recreational activities – some** landscape capacity for **small scale and low key activities** (including at Chard Farm) that integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of natural landscape elements; are 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 ONL values.**

- 7.3 The addition of “small scale and low key” to the first part of paragraph 67 implies that these requirements are synonymous with ‘screening, camouflaging, being of

a sympathetic scale, appearance and character’ etc. Interestingly, however, it is the very distinctive nature of Chard Farm’s architecture and the way in which both its winery and vineyards are framed by the natural setting around it that creates so much appeal and so much of a positive statement within part of the ONL. That ‘statement’ is fundamentally cultural, but benefit is clearly derived from its interplay with its natural surrounds. In this context, “small scale and low key” has little real value or meaning.

- 7.4 On the other hand, I agree that most other forms and types of development emerging within the ONL should be sympathetic to its existing values and appropriately recessive – which accords with the remaining development requirements set out in paragraph 67. In my opinion ‘low key’ adds nothing to those other requirements, while ‘small scale’ implies that small is always beautiful, which is never a given. Furthermore, it begs the question, what does ‘small scale’ actually mean – is it relative to the entire ONL, the lower river corridor or an even finer grained catchment, ie. what is the threshold for a proposal being ‘small scale’?
- 7.5 Overall, therefore, I consider that paragraph 67 as notified addresses the related issues of an appropriate level of integration and an appropriate degree of visual recessiveness. As such, I see no need for the s.42A Report’s addition of “*small scale and low key activities*”.

Visitor accommodation and tourism related activities

- 7.6 QPL’s submission supported the recognition of Capacity for visitor accommodation and tourism related activities and sought that this be retained. It also seeks that the statement be amended as follows:

68. Visitor accommodation and tourism related activities – some landscape capacity for activities on the easy contour flat and low-lying terraces and floodplains (including at Chard Farm) that are: located to optimise the screening and/or camouflaging benefit of natural landscape elements; designed to be difficult to see in views from the Kawarau River, Twin River Trail, Bridesdale, Shotover Country and Lake Hayes Estate; are of a modest-sympathetic scale; have an low-key ‘rural’ appropriate ‘non-urban’ character; integrate landscape restoration and enhancement; enhance public access; and protect the area’s ONL values. **No** landscape capacity on the steep mountain slopes and fans except for ‘glamping’ activities.

- 7.7 The Section 42A report recommends accepting only some of QPL’s suggestions as shown in green. The text highlighted in blue are further recommended changes:

68. Visitor accommodation and tourism related activities – some landscape capacity for activities on the very gently sloping to flat and low-lying terraces and floodplains (including at Chard Farm) that are: designed to be difficult to see in views from the Kawarau River, Twin River Trail, Bridesdale, Shotover Country and Lake Hayes Estate; are of a modest or sympathetic scale; have a low-key ‘rural’ or ‘non-urban’ character; integrate landscape restoration and enhancement; and enhance public access; and ~~protect the area’s ONL values~~. **No** landscape capacity on the mountain slopes and fans except for sensitively located and designed glamping activities.

- 7.8 In relation to the more specific issue of visitor accommodation and such-like activities within the Kawarau River valley, I generally agree with the section 42A Report suggestions in relation to that part of the paragraph after “*Lake Hayes Estate*”.
- 7.9 On the other hand, I have concerns about the way in which the visibility of ANY visitor accommodation development south of the Kawarau River would be addressed under this paragraph, bearing in mind the string of recreational areas and residential development facing towards that area and the way in which some existing development – with Chard Farm as a prime example – is reasonably visible yet can conceivably complement its natural setting. Once more, this raises the issue of how best to ensure such complementarity – whether through screening, camouflage and visual recession or by making a positive statement – albeit one that remains secondary to the natural qualities of the wider ONL and ‘sits comfortably within’ that setting.
- 7.10 In responding to this issue, I consider it most unlikely that any visitor accommodation development could occur on the southern side of the Kawarau River without it being visible from the Twin Rivers Trail, Kawarau River, Lake Hayes Estate or Bridesdale (less so Shotover Country) – or any combination of these receiving environments. As such, the degree of exposure (‘difficult to see’ or not from a wide range of locations) would almost certainly become a matter of significant and lengthy debate. In my opinion, the more appropriate way to address these matters might be via a substantially revised paragraph 68:

68. Visitor accommodation and tourism related activities – some landscape capacity for activities on the gently sloping to flat and low-lying terraces and floodplains (including at Chard Farm) providing such development:

- Is demonstrably integrated into its landscape setting and is suitably recessive with regard to its location and context, building configuration and design, and landscape design;
- Avoids having an impact on key features within the river corridor, including the river margins, stands of mature existing vegetation,

stream corridors and fans, and the landforms of the main range slopes (above the river terraces).

- Remains secondary to, and / or peripheral to, key views of the Northern Remarkables' main slopes and peaks, and the Kawarau River;
- Remains discreet and supports the rural character of the ONL, avoiding any feeling of urban encroachment south of the Kawarau River;
- Remains difficult to see from public roads outside Lake Hayes Estate, Bridesdale and Shotover Country; and

As a whole, any such development should be of a modest or sympathetic scale, help to retain the 'rural' and 'non-urban' character of the wider ONL, integrate with more wide-spread landscape restoration and enhancement, and enhance public access to the ONL. **No** landscape capacity on the mountain slopes and fans except for sensitively located and designed glamping activities.

- 7.11 The 'assessment criteria', implicit in this revised paragraph (or similar) might well accommodate some tightly focused, suitably recessive, visitor accommodation and related activities south of the Kawarau River, without it having to be effectively invisible to 'work'. However, they would not accommodate development that is out of scale, intrusive and / or at odds with the character of its ONL setting.

Farm Buildings

- 7.12 QPL's submission supported the recognition of Capacity for farm buildings and seeks that this be retained. It also sought that references to "modestly" scaled buildings be amended to refer to "sympathetic scale" which allows for a more contextual assessment of appropriate scale:

72. **Farm buildings** – in those areas of the ONL with pastoral and viticultural land uses, **limited** landscape capacity for ~~modestly~~ **sympathetic** scaled buildings that reinforce existing rural character (including viticultural land use) and maintain openness where openness is an important existing landscape characteristic.

- 7.13 The section 42A report recommends accepting this change.
- 7.14 Again, for the reasons set out above in relation to Schedule paragraphs 67 and 68, I consider that the amendment proposed in the s.42A Report is appropriate, however I suggest that "sympathetically" would be more grammatically correct.

Utilities and regionally significant infrastructure

- 7.15 QPL's submission supports the recognition of Capacity for Utilities and regionally significant infrastructure and seeks that this be retained:

75. **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 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.

7.16 The section 42A report recommends the following additions highlighted in blue:

75. **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.

7.17 It is important to remember that the area south of the Kawarau River constitutes the Northern Remarkables ONL PA. As such, unsightly or inappropriately located transmission lines and other infrastructure south of the Kawarau River would be problematic in relation to the values of the ONL. In my view, any such infrastructure should be located as close as possible to the existing 220kV corridor north of the river where it can be more readily absorbed by the existing development and modification found in that area. In my opinion, the utilities and regionally significant infrastructure paragraph should be further edited to reflect this.

Renewable Energy Generation

7.18 QPL's submission supported the recognition of Capacity for renewable energy generation and sought that this be retained:

i. **Renewable energy generation – no** landscape capacity for commercial-scale renewable energy generation. **Limited** capacity for discreetly located and small-scale renewable energy generation. **Limited** landscape capacity for discreetly located and small-scale renewable energy generation on the flat and low-lying terraces and floodplains.

7.19 The section 42A report recommends accepting this point plus further additions highlighted in blue:

75a **Renewable energy generation – no** landscape capacity for commercial-scale renewable energy generation. Limited capacity for discreetly located and small-scale renewable energy generation. Limited landscape capacity for discreetly located and small-scale renewable energy generation on the flat and low-lying terraces and floodplains or in association with existing structures in the Remarkables Ski Area.

7.20 For the reason set out above in relation to Schedule paragraph 75, I agree with this proposed amendment.

Rural Living

- 7.21 QPL's submission supported the recognition of Capacity for rural living and sought that this be retained. It also sought amendments as follows:

77. **Rural living** – ~~very limited some~~ landscape capacity for activities on the ~~flat easy contour~~ and low-lying terraces ~~and floodplains~~ that are: ~~located to optimise the screening and/or camouflaging benefit of natural landscape elements; designed to be difficult to see in views from the Kawarau River, Twin River Trail, Bridesdale, Shotover Country and Lake Hayes Estate;~~ are of a ~~modest sympathetic~~ scale; have a low-key 'rural' character; integrate landscape restoration and enhancement; ~~enhance public access;~~ and protect the area's ONL values. **No** landscape capacity on the ~~steep~~ mountain slopes and fans.

- 7.22 The section 42A report recommends the following changes:

77. **Rural living** – **very limited** landscape capacity for activities on the flat and low-lying terraces and floodplains that are: designed to be difficult to see in views from the Kawarau River, Twin River Trail, Bridesdale, Shotover Country and Lake Hayes Estate; are of a modest scale; have a low-key 'rural' character; integrate landscape restoration and enhancement; and enhance public access; ~~and protect the area's ONF values.~~ **No** landscape capacity on the mountain slopes and fans.

- 7.23 My comments in paragraph 7.10, addressing visitor accommodation and tourism related activities, are also relevant to this part of the Landscape Schedule. Again, it is my opinion that the focus should shift from the visibility of any new rural living development relative to a wide range of receiving environments to ensuring:

- (a) Its integration with the existing landscape – in terms of location, built form and amelioration / mitigation;
- (b) That it is visually recessive;
- (c) That it avoids having an adverse impact on key views of The Remarkables and Kawarau River; and
- (d) That it avoids having an adverse impact on rural character and creating an urban node on the south side of the Kawarau River.

- 7.24 To this end, it is my view that an amended paragraph, very similar to that proposed for paragraph 68, would better serve the twin purposes of accommodating limited residential development south of the river and protecting the ONLs' values. For the sake of completeness, that could read as follows:

68. **Rural Living** – **limited** landscape capacity for activities on the gently sloping to flat and low-lying terraces and floodplains (including at Chard Farm) providing such development:

- Is demonstrably integrated into its landscape setting and is suitably recessive with regard to its location and context, building configuration and design, and landscape design;
- Avoids having an impact on key features within the river corridor, including the river margins, stands of mature existing vegetation, stream corridors and fans, and the landforms of the main range slopes (above the river terraces).
- Remains secondary to, and / or peripheral to, key views of the Northern Remarkables' main slopes and peaks, and the Kawarau River;
- Remains discreet and supports the rural and natural character of the ONL, avoiding any feeling of urban encroachment south of the Kawarau River;
- Remains difficult to see from public roads outside Lake Hayes Estate, Bridesdale and Shotover Country; and

As a whole, any such development should be of a modest or sympathetic scale, help to retain the 'rural' and 'non-urban' character of the wider ONL. **No** landscape capacity on the mountain slopes and fans except for sensitively located and designed glamping activities.

Gondolas

- 7.25 QPL's submission supported the recognition of Capacity for gondolas and seeks that this should be retained:

78. **Gondolas – limited** landscape capacity to improve public access to focal recreational areas higher in the mountains via non-vehicular transportation modes such as gondolas, provided they are positioned in a way that is sympathetic to the landform, are located and designed to be recessive in the landscape, and protect the area's ONL values.

- 7.26 Schedule 21.22 refers to "gondolas" in various places, for instance at 21.22.12 which references the "skyline Gondola" in a manner that is consistent with the lay understanding of what this term encompasses in terms of the cableway and associated infrastructure at each end of the facility.

- 7.27 The section 42A report accepts this point but suggests the following edits highlighted in blue:

78. **Gondolas Passenger Lift Systems – limited** landscape capacity to improve public access to focal recreational areas higher in the mountains via non-vehicular transportation modes such as gondolas, provided they are positioned in a way that is sympathetic to the landform, are located and designed to be recessive in the landscape ~~and protect the area's ONL values.~~

- 7.28 The narrative of the section 42A report states in respect of this change:

10.31 Gondolas are referred to in several schedules but are not defined in the PDP. Chapter 2 has a definition for 'Passenger Lift System' which includes gondolas. I have discussed this definition with Ms Gilbert and Mr Head who have confirmed that passenger lift system encompasses the type of gondola / gondola infrastructure anticipated by the schedules. I note

that the definition is limited to transporting passengers and goods within or to a SASZ, which I understand is generally appropriate in the context of the schedules, as where capacity for gondolas is included, this is typically in relation to PAs where there is a SASZ in proximity. The term gondola is not one of the activities listed in SP 3.3.38 and SP 3.3.41. To align with existing PDP terminology I recommend that the reference to gondolas is changed to passenger lift systems. Ms Gilbert and Mr Head have made these recommended changes to the schedules.

7.29 The definition of Passenger Lift Systems in the PDP is as follows:

Means any mechanical system used to convey or transport passengers and other goods within or to a Ski Area Sub-Zone, including chairlifts, gondolas, T-bars and rope tows, and including all moving, fixed and ancillary components of such systems such as towers, pylons, cross arms, pulleys, cables, chairs, cabins, and structures to enable the embarking and disembarking of passengers. **Excludes base and terminal buildings.**

[emphasis added]

7.30 The Rural Zone of the PDP provides for both Passenger Lift Systems and associated terminal buildings and stations as restricted discretionary activities.

Policy 21.2.6.4 is to:

Provide for non-road forms of access to the Ski Area Sub-Zones, by way of passenger lift systems, terminal buildings and stations for passenger lift systems, and ancillary structures and facilities:

a. in locations where there is landscape capacity for that activity (which could include locations where buildings or structures will not be reasonably difficult to see from beyond the boundary of the site in question, in which case Policy 6.3.3.1(b) does not apply); and

b. in a manner that protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes by:

i. avoiding adverse effects on landscape values; and

ii. if avoidance is not practicable due to either the functional or operational needs of the activity, remedying or mitigating any adverse effects.

7.31 The effect of the change recommended by the section 42A report is to exclude base and terminal buildings from the identified landscape capacity. The question arises as to whether this outcome is justified in landscape terms for the Northern Remarkables PA.

7.32 My understanding of the term 'gondolas' has always been that they include some form of base and / or terminal building. Indeed, it is difficult to see how a gondola could operate without such a building or buildings, including a shelter for passengers waiting to enter the cabin or alight, provision for the maintenance of the gondola system and the storage of both cabins and spare equipment. Consequently, I had always viewed and assessed such a system on the basis of

that provision. Based on my knowledge of the Northern Remarkables PA, there is some limited capacity for Passenger Lift Systems and associated terminal buildings and stations were there are sympathetic to the landform, and are located and designed to be recessive in the landscape.

- 7.33 In my opinion, it is appropriate to recognise this capacity by either:
- (a) Resurrecting the term 'gondola' in conjunction with an appropriate description of that system in the schedule; or
 - (b) Adding the words "base and terminal buildings" to the description of capacity.
- 7.34 Additionally, given that QPL's proposed gondola would have the dual functions of providing access to The Remarkables ski area and connecting Queenstown Airport with Ladies Mile, it is my view that it would be appropriate to amend the description of Passenger Lift Systems so that it reads: "to improve public access, including to focal recreational areas higher in the mountains". This would ensure that the Queenstown to Ladies Mile link is not ruled out by the proposed description.

8. KAWARAU RIVER ONF VALUES

Important ecological features and vegetation types

- 8.1 QPL's submission supported and sought the retention of the statements at 9 and 10 regarding the presence of pest plant and animal species. The control and removal of such pests is an important opportunity for landscape protection and enhancement. The existing wording is as follows:
- 9. Plant pest species include wilding conifers, crack willow, sweet briar, buddleia, hawthorn, sycamore, broom and gorse.
 - 10. Animal pest species include rabbits, possums, stoats, rats and mice.
- 8.2 The section 42a report recommends accepting this point.
- 8.3 I agree with this amendment and note that the covering wording to the schedule helps put in context how these 'values' can be approached when considering use and development.
- 8.4 QPL's submission noted that Paragraph 38 relates to the perceived naturalness "within the river landscape". However, this not entirely logical or consistent as pasture, farm tracks, fencing, power lines and the margins of the Kawarau

Heights, Lake Hayes Estate and Bridesdale settlements are all visible within the river's confines and margins. As a result, QPL sought amendments to paragraph 39 to rectify this inconsistency and provide a more balanced view by expressly stating the effect of terrain shielding in limiting visibility of development.

8.5 QPL's proposed wording is as follows:

38. Generally, there is a high perception of naturalness throughout the river corridor due to the dominance of the waterbody and its vegetated margins. Whilst boating activity and trails are evident in the corridor, these activities indicate the high recreational values of the ONF. Where evident, structures are modest in scale and/or sympathetic character and remain subservient to the natural landscape.

39. Between Whakatipu-wai-Māori (Lake Whakatipu) and the Kawarau Bridge Bungy, pastoral land use dominates the floodplain areas and nearly all the vegetation flanking the river is exotic. Even so, there remains a perception of significant naturalness within the river landscape. The ~~very~~ limited visibility of built development on the Remarkables side of the river ~~is important in~~ contributes to this ~~regard~~, even if pasture, farm tracks, fencing, power lines and the margins of the Kawarau Heights, Lake Hayes Estate and Bridesdale settlements are evident. However, the confined, often intimate nature of the river corridor provides terrain shielding and limits exposure to such elements.

8.6 The section 42a report only recommends accepting QPL's addition of "provides terrain shielding and". It also recommends amending "Whakatipu-wai-Māori" to "Whakatipu-Waimāori".

8.7 It appears that the greater bulk of residential development and farm activities near the Kawarau River have been relegated to a subsidiary role in terms of its character. This accords with the river's high level of perceived naturalness, but as the Schedule stands (and as recommended) it doesn't address the full range of landscape elements that affect perception of the river corridor, including nearby development and infrastructure. This is similar to the situation addressed at my paragraphs 6.19-6.21 in relation to the physical values of the Northern Remarkables ONL. Again, therefore, I consider that it would be more appropriate to either acknowledge the presence of "*pasture, farm tracks, fencing, power lines and the margins of the Kawarau Heights, Lake Hayes Estate and Bridesdale settlements*" in that same paragraph, or to create a new paragraph that goes on to acknowledge these countervailing factors, which also affect perception and the character of the river ONF.

9. KAWARAU RIVER ONF CAPACITY

Commercial recreation activities

- 9.1 QPL's submission supports the recognition of Capacity for commercial recreation activities and seeks that this be retained as follows:

Commercial recreational activities – some landscape capacity for activities that integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of existing natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; enhance public access; and protect the area's ONF values.

- 9.2 The section 42A report recommends accepting "some landscape capacity" with further amendments in blue text:

Commercial recreational activities – some 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 existing 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.~~

- 9.3 For the reasons set out in my paragraphs 7.3-7.5, I consider the use of the terms 'small scale' and 'low-key' to be superfluous. The integration of commercial recreational activities into the Kawarau River ONF can be effectively managed by addressing the other factors outlined in that paragraph, as low key pertains to the screening / integrating / camouflaging already referred to while the threshold for 'small scale' remains problematic, ie. in what context is a proposal 'small scale'?

Visitor accommodation and tourism related activities

- 9.4 QPL's submission opposed the statement that there is no landscape capacity for visitor accommodation and tourism activities. QPL sought the following wording:

visitor accommodation and tourism related activities – ~~no landscape capacity~~ some landscape capacity for activities that integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of existing natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; enhance public access; and protect the area's ONF values.

- 9.5 The section 42A report recommends retaining no land capacity for visitor accommodation and tourism related activities.

- 9.6 Having traversed all of QPL's land near the Kowarau River, I am of the opinion that a pocket, or some small pockets, of visitor accommodation and / or related activities might be provided for in the ONF river corridor east of Bridesdale, within a visually quite discreet part of the river valley. However, this would need to be carefully managed. To that end, I think there could be some capacity for such development and activities, provided it is subject to careful scrutiny. In my view, the paragraph proposed by QPL would address the key matters associated with such review; alternatively, a paragraph similar to those proposed after my paragraphs 7.10 and 7.33 would, in my opinion, provide an adequate level of control e.g.

Visitor accommodation and tourism related activities – some landscape capacity for activities on the gently sloping to flat and low-lying terraces and floodplains providing such development:

- Is demonstrably integrated into its landscape setting and is suitably recessive with regard to its location and context, building configuration and design, and landscape design;
- Avoids having an impact on key features within the river corridor, including the river margins, stands of mature existing vegetation, stream corridors and fans, and the landforms of the main range slopes (above the river terraces).
- Remains secondary to, and / or peripheral to, key views of the Northern Remarkables' main slopes and peaks, and the Kowarau River;
- Remains discreet and supports the rural and natural character of the ONL, avoiding any feeling of urban encroachment south of the Kowarau River;
- Remains difficult to see from public roads outside Lake Hayes Estate, Bridesdale and Shotover Country; and

As a whole, any such development should be of a modest or sympathetic scale, help to retain the 'rural' and 'non-urban' character of the wider ONL, integrate with more wide-spread landscape restoration and enhancement, and enhance public access to the ONL. **No** landscape capacity on the mountain slopes and fans except for sensitively located and designed glamping activities

Transport infrastructure

- 9.7 QPL's submission supported the recognition of Capacity for transport infrastructure and sought that this be retained. QPL's submission also sought that "Very limited" be amended to "Some" capacity for wharfs, jetties and bridges and that recognition of capacity for "cableway/gondola crossings" in this area be added as follows:

transport infrastructure – very limited landscape capacity for low key 'rural' roading infrastructure outside of the State Highway corridor. **Very limited** **Some** landscape capacity for wharfs, jetties or bridges, **and cableway/gondola crossings** that are located in more modified parts of the

ONF between Lake Whakatipu and Morven Ferry and that are designed to be of a sympathetic appearance and character; integrate landscape restoration and enhancement; enhance public access; and protect the area's ONF values.

- 9.8 The section 42a report does not recommend changing “very limited” to “some” capacity in relation to wharfs, jetties and bridges. It did recommend further additions shown in blue:

transport infrastructure – very limited landscape capacity for low key ‘rural’ roading infrastructure outside of the State Highway corridor. **Very limited** landscape capacity for wharfs, jetties or bridges that are located in more modified parts of the ONF between [Whakatipu-Waimāori](#) (Lake Whakatipu) and Morven Ferry and are designed to be of a sympathetic appearance and character; integrate landscape restoration and enhancement and enhance public access; ~~and protect the area's ONF values.~~

- 9.9 Although, “cableway/gondola crossings” were not added to this statement, the section 42A did recommend an additional statement as follows:

[Passenger lift systems – limited landscape capacity to improve public access to focal recreational areas higher in the mountains via non-vehicular transportation modes such as gondolas, provided they are positioned in a way that is sympathetic to the landform, are located and designed to be recessive in the landscape.](#)

- 9.10 My reading of the 42A Report recommendation is that it would effectively limit “transport infrastructure” to ‘cableway / gondola crossings’ and would go on to physically limit these to areas / corridors “*that are located in more modified parts of the ONF between Lake Whakatipu and Morven Ferry.*” This addresses the more modified part of the Kawarau River ONF, while the further addition to that paragraph addressing ‘Passenger Lift Systems’ goes on to state that such systems are “*to improve public access to focal recreational areas higher in the mountains*” (outside the ONF). Together, these statements appear to address the Remarkables Gondola corridor in its entirety in an appropriate fashion.
- 9.11 However, as noted above, given that QPL’s proposed gondola would have the dual functions of providing access to The Remarkables ski area and connecting Queenstown Airport with Ladies Mile, it is my view that it would be appropriate to amend the description of Passenger Lift Systems so that it reads: “*to improve public access, including to focal recreational areas higher in the mountains*”. This would ensure that the Queenstown to Ladies Mile link is not ruled out by the proposed description.
- 9.12 Turning to the matter of wharfs, jetties and bridges, I agree that the number of structures traversing and entering the river’s waters should be limited to manage

any potential cumulative degradation of its ONF values. However, cable suspension bridges – or similar – are common now on DOC tracks within wilderness areas and are visually lightweight, if not entirely permeable. Such connections over the Kawarau River could help to expand the Twin Rivers Trail and general access to the southern side of the Kawarau River. Consequently, I support the bar being raised from “very limited” to “limited” capacity for such structures, providing they remain lightweight, are located within more recessive parts of the Kawarau River corridor and focus on facilitating pedestrian and cyclist access across the river (ie. not vehicular use). I agree with the rest of the wording of that paragraph.

Mineral Extraction

- 9.13 QPL’s submission supports the recognition of Capacity for mineral extraction and seeks that this be retained:

mineral extraction – limited landscape capacity for small scale gravel extraction that protects the area’s ONF values.

- 9.14 The section 42A report recommends adding “very” in front of “limited landscape capacity” and deleting “that protects the area’s ONF values”.
- 9.15 I consider that the s.42A Report recommendation is balanced: it recognises that ‘very limited’ mineral extraction on farms is part and parcel of their operation, but it also acknowledges that such activities can, and often will, degrade parts of any ONL.

Utilities and regionally significant infrastructure

- 9.16 QPL’s submission supports the recognition of Capacity for regionally significant infrastructure and seeks that this be retained:

utilities and regionally significant infrastructure – limited landscape capacity for infrastructure that is co-located with existing facilities. 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.

- 9.17 The section 42A report recommends the following additions highlighted in blue:

utilities and regionally significant infrastructure – limited landscape capacity for infrastructure that is co-located with existing facilities. 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 there is limited landscape capacity for the upgrade of existing infrastructure within the same corridor and limited landscape capacity in circumstances where**

there is a functional or operational need for the particular location and structures are designed and located to limit their visual prominence, including associated earthworks.

9.18 Again, I have concerns about the paragraph recommended in the s.42A Report, as it appears to potentially accommodate transmission infrastructure within any part of the ONF. Yet, all of the river corridor is, in my assessment, highly sensitive to the potentially adverse effects of such development. Consequently, as outlined in my paragraph 7.26 above, it is my opinion that any such infrastructure requirements should be accommodated within parts of the river valley closer to existing development and modification – both away from the Kowarau River itself and down its northern side. Again, therefore, it is my opinion that the utilities and regionally significant infrastructure paragraph should be further edited to reflect this.

10. CONCLUSIONS

10.1 To conclude, I agree that for most of the Northern Remarkables ONL and Kowarau River ONF, further development and modification would be inappropriate and could well be to the significant detriment of their values. Even so, I consider that there remains some room to move within both, albeit to a limited degree, subject to careful management.

10.2 In my view the key tools for achieving effects management revolve around ensuring the sensitive location and design of new development so that it:

- Is fully integrated into its setting;
- Remains visually recessive and therefore subservient the various elements, patterns and features that are central to both the natural and rural character of the ONL and ONF;
- Avoids any sense of urban incursion into the Kowarau River and its margins, and the ONL south of it;
- Makes a positive contribution to the character and values of both; and
- Protects the core values of the ONL and ONF overall.

10.3 In my view, the changes that I have supported and, in some cases, suggested would achieve this, while not over-stepping the mark into controls that effectively negate the potential for any development, irrespective of its merits (or otherwise). They focus on the integration of new development, accepting that no new

development should be enabled across most of the Northern Remarkables ONL and that opportunities for new development will be limited and require careful management within the Kawarau River ONF.

- 10.4 As such, my recommendations in relation to the management of new development have a strong focus on the location, extent, configuration and design of any such development, together with the effective mitigation of any adverse effects arising from it, or measures which enhance landscape values overall such as revegetation and pest control. The existing attributes and values of both the ONL and ONF should provide the frame of reference against which any future development proposals are assessed, and such assessment necessarily needs to address (and respond to) the variable sensitivities found within both the ONL and ONF.

Stephen Brown BTP, Dip LA FNZILA

Dated: 12 September 2023