

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**

Evidence of Di Lucas on behalf of Upper Clutha Environment Society

September 2023

1. INTRODUCTION

- 1.1. My full name is Diane Jean Lucas ONZM. I am a landscape architect and director of Lucas Associates, a landscape planning, design and management practice, established in Te Waipounamu in 1979 and working throughout Aotearoa.
- 1.2. I hold a Post-Graduate Diploma and a Master of Landscape Architecture, a Bachelor of Science (Otago), am a Life member of the New Zealand Institute of Landscape Architects, a Registered NZILA Landscape Architect and have been recognised with an Officer of the New Zealand Order of Merit.
- 1.3. Five generations ago in 1841 and 1842 my widowed grandmothers arrived from Scotland and Ireland, their children marrying and settling by the Clutha, the Mata-Au, and we remain of this catchment. I am familiar with the Queenstown Lakes District's rural landscapes being addressed, and visited the specific landscapes on which I provide feedback.
- 1.4. Lucas Associates prepared for QLDC the land typing and ecosystems framework at various scales across the district. The project won the top national landscape planning award – the Charlie Challenger Award 1996 - and is now available on arcGIS as part of a nationwide public information system to assist in land management planning by providing timeless information on the underlying nature of land at various scales www.landtyping.nz
- 1.5. Over several decades I have been engaged by the Upper Clutha Environment Society (UCES) and other parties to undertake various landscape assessments within the Queenstown Lakes District (QLD), including addressing proposals potentially affecting outstanding natural landscapes / features (ONF/L), Visual Amenity Landscapes (VAL) or Rural Character Landscapes (RCL).
- 1.6. I participated in expert conferencing regarding Topic 2 (JWS January 2019), VIF and PA ONFL (JWS October 2020), and, Upper Clutha PA Mapping (JWS October 2020).
- 1.7. Regarding methodologies, I was involved as a peer reviewer in the production of *Te Tangi a te Manu*, the Aotearoa NZ Landscape Assessment Guidelines (NZILA 2022) (TTatM). I note the Pigeon Bay / WESI assessment factors referenced by Ms Gilbert were a product of our Canterbury Regional Landscape Study (1993), and I was also involved in the Matakana Island assessments.

2. I appreciate that for the Proposed Queenstown Lakes District Plan (PDP) a Priority Area list and mapping have been confirmed by the Environment Court along with provisions to address their protection (PDP Part 2. Ch. 3 Strategic Direction).
3. I reviewed the landscape architects' **Methodology Statement** for ONFL and RCL PA Landscape Schedules (May 2022) and the **s32** Evaluation PDP Chapter 21 Landscape Values Schedules (30 June 2022). In response I provided a preliminary statement for UCES assessing the Council's draft Schedules of Landscape Values (30 June 2022) particularly for Upper Clutha landscapes regarding the Proposed Landscape Variation for Chapter 21 (Rural Zone).
4. I have now reviewed the evidence provided for the council (August 2023) in response to submissions and provide a revised response to the proposed Methodology, Preambles and Schedules.
5. Reviewing the proposed interpretation of the PDP measures, I provide comment regarding the proposed schedules and capacity ratings addressing the ONL/F PAs and RCL PAs particularly of the Upper Clutha.
6. CODE OF CONDUCT

Although a council hearing, I confirm that I have prepared this evidence in accord with the Code of Conduct for Expert Witnesses (Environment Court Practice Note 2023).

The issues addressed in my statement of evidence are within my area of expertise, except where I state that I am relying on the evidence or advice of others.

7. SCOPE OF EVIDENCE

My evidence is structured to firstly identify any methodological concerns regarding the PA Schedules as currently proposed in the evidence of Ms Evans, Ms Gilbert and Mr Head for QLDC.

I then briefly address individual PA Schedules (noting the landscape architect who has reviewed it for QLDC)

for Upper Clutha ONFL :

21.22.18 Cardrona Valley ONL PA (Head)

21.22.19	Mount Alpha ONL PA	(Head)
21.22.21	West Wānaka ONL PA	(Gilbert)
21.22.23	Hāwea South North Grandview ONL PA	(Gilbert)
21.22.24	Lake Mackay Station and Environs ONL PA	(Head)
21.22.10	Mt Barker ONF PA	(Head)
21.22.11	Mt Iron ONF PA	(Head)

for Upper Clutha RCL:

21.23.1	Cardrona River/Mount Barker Road RCL PA	(Head)
21.23.2	Halliday Road / Corbridge RCL PA	(Head)
21.23.3	West of Hāwea River RCL PA	(Gilbert)
21.23.4	Church Road – Shortcut Road RCL PA	(Gilbert)
21.23.5	Maungawera Valley RCL PA	(Head)

METHODOLOGY

8. The Proposed District Plan recognises the importance and vulnerability of the rural landscapes of the Queenstown Lakes District. The PDP methods seek to carefully constrain and guide landscape change to sustain the outstanding natural landscape values and the landscape character and amenity. Development pace and pressure has been such that the district's landscapes are highly vulnerable to crossing thresholds that would result in diminished landscape values.
9. The PDP has identified Priority Areas that recognise the considerable risks of each area reaching a tipping point. The Court's directive to produce a Schedule for each Priority Area which identify the landscape attributes, values and capacity of each PA is a recognition of the vulnerability of these areas. The schedules thus assess the level of development potentially appropriate or inappropriate in each ONFL¹ and RCL PA.
10. Following site visits and a review of council's proposed Variation and supporting documents I assess that the cautionary approach being taken is appropriate and necessary. Whilst consideration at both a broad and scale provides challenges, due to the landscape significance,

¹ NOTE. outstanding natural landscapes and outstanding natural features are together referenced as ONFL

the importance of landscape integrity, and the vulnerability of these aspects to degradation through development activity, an extremely cautionary approach in this guidance document is in my opinion essential.

11. From my decades of interacting with community interests, and of assessing landscapes and development proposals through both the Whakatipu and the Upper Clutha, overall I commend the schedule drafting provided by the council's experts. For the PAs and the proposed schedules that I have specifically considered, I do not identify any landscape capacity ratings that should be amended to a higher capacity.

12. The Hearings Panel Directions 1 (4 August 2023 para 3.2) note as the Court's requirement to:

- protect the landscape values of ONFL, and,
- maintain or enhance the visual amenity values of RCL

including through identifying the landscape values of ONFL and the landscape character and visual amenity values of RCL. However, for the latter, I understand the direction is instead to maintain or enhance the landscape character and visual amenity of RCL. Para. 3.5 notes that a schedule identifying landscape values and landscape capacity of ONFL and RCLs would assist.

13. The Panel notes (para 3.4) the Court direction to identify attributes, values and capacity of identified PA landscapes within ONFL and RCLs. In response, Council has added the VIF (Values Identification Framework) with the PA that were identified by the Court and a high level method to identify landscape values and landscape capacity in each PA (Panel para. 3.6).

14. That is, the Schedule drafting is not a description task regarding 'what is'. The plantation, the weeds, the pasture and buildings may be entirely incidental to the natural values that are to be protected, maintained or enhanced. If not the values, they should not be scheduled as such. For care is needed to not confuse landscape description with value identification. Care is needed to remain at the PA scale and not reference sites. Care is needed with language, for example, 'pasture' does not equal 'pastoral'. Much of these lands are naturally forested, naturally clothed in beech-podocarp forests, but that is not 'forestry'.

15. It is noted that the Council proposes :

- landscape schedule 21.22 with landscape values, attributes and capacity for PA ONFL, and,
- landscape schedule 21.23 with landscape character, visual amenity values and capacity for PA RCLs (Panel para 3.7).

16. I have read the statements of the experts for QLDC and in particular their response to my previous criticism and proposed amendments to the methodology including the appendices with proposed amendments. I provide further comment.

17. As the statutory basis for the PDP Chapter 21 Variation to include Schedules for specified Priority Areas within outstanding natural features and landscapes (ONFL) and Rural Character Landscapes (RCL) within the Queenstown Lakes District, I have considered the **PDP Strategic Direction Chapter 3** (November 2021), with regard to methodology and content. In particular,

3.1B.5 b. 'Landscape Capacity':

i. re ONFL, *"the capacity of a landscape or feature to accommodate subdivision and development without compromising its identified landscape values"*; and,

ii. re RCL, *"the capacity of the landscape character area to accommodate subdivision and development without compromising its identified landscape character and while maintaining its identified visual amenity values."*

That is, for

i. ONFL, landscape values to be protected require identification; and, for

ii. RCL, both the landscape character and the visual amenity values to be protected are to be identified.

18. Thus it is clear that the "capacity test" is not about a quota being available for an area that may or may not have been taken up. It is not about a "first in first served" approach to get a "stake in the ground" and take up the capacity identified. For ONFL the capacity is about the values that exist and need to be protected. For RCL it is about identifying the essential landscape character and amenity to ensure it is maintained and enhanced.

19. It is as yet unclear whether the scheduling method adequately provides for the sustaining of natural resources. In terms of our current climate and biodiversity crises, as well as protection of natural values, recovery, restoration and repair ought to also be encouraged. Thus it is important to recognise that rural landscapes that may currently be broad pastoral areas might appropriately wish to increase their inseting of greenhouse gas emissions (GHG) through allowing and encouraging natural forest regeneration, including through successional cover such

as bracken, divaricating shrublands, manuka and kanuka. All of these vegetation types store carbon and would inset emissions from stock and farm fuel use.

20. Recognition of the natural attributes and values of land should include the capacity for recovery of natural ecosystems. The schedules are currently inadequate in addressing such values. It is important that “pasture” recognition as a landscape value is not a disincentive for woody recovery. Noting too that bracken fern can reputedly sequester as much carbon for a decade as pine.

21. Similarly, reducing grazing by cattle through instead sheltering them in structures and providing cut and carry feed from the site is an exemplary method for enabling management of GHG. Therefore it is of concern if provision of stock shelters within a cut’n carry regime would be discouraged by the capacity ratings.

22. However farm intensification can certainly adversely affect natural landscape values, landscape character and visual amenity. However, in addressing such change, it is important the landscape capacity ratings do not inappropriately discourage farming methods that would instead enhance biodiversity and climate change mitigation.

23. As per **3.1B.5 e. ‘Priority Area’**,

- i. the **ONFLPAs** are to be listed in **SP 3.3.36** and mapped, and
- ii. the Upper Clutha **RCLPA** listed in **SP 3.3.39** and mapped, all in Schedule 21.

SO 3.2.5.2 a. directs that the specified landscape values of **ONFL PAs** are protected.

SO 3.2.5.7 directs that **RCL PAs** in the Upper Clutha Basin are identified, and their associated landscape character and visual amenity values, plus their related landscape capacity. That is, I assume **SO 3.2.5.7 b.** references only the **RCL PAs** of the Upper Clutha.

24. ONFL Priority Areas

SP3.3.29 a. directs that for **ONFL PAs** scheduled in 21.22 landscape values and landscape capacity are identified “*in accordance with the values identification framework in SP 3.3.36 – 3.3.38 and otherwise through the landscape assessment methodology in SP 3.3.45 and through best practice landscape assessment methodology*”.

SP 3.3.37 directs that for each ONFL PA described in Schedule 21.22 the landscape attributes (physical, sensory and associative), the landscape values, and the related landscape capacity are to be described at an appropriate landscape scale.

25. RCL PAs

As per **SP3.3.39 – 3.3.40** the RCL PAs identified in Schedule 21.23 are to include descriptions at an appropriate landscape scale of :

- a. *the landscape attributes (physical, sensory and associative);*
- b. *the landscape character and visual amenity values: and*
- c. *the related landscape capacity.*

26. ATTRIBUTES & VALUES

I note that for any ONFL or RCL, the landscape values include *'biophysical, sensory and associative attributes (and 'values' has a corresponding meaning).'*

The statement that attributes and values have a corresponding meaning is assumed to reference the dimensions to be addressed, that is, biophysical, sensory and associative dimensions. I recognise that attributes and values are separately referenced in the provisions and are thus not synonymous. A value might include various attributes, often a value might involve a combination of the presence or absence of physical, associative and/or sensory attributes. Thus, as per **3.1B.5 b.**, for ONFL, these landscape values are to be identified. It directs the identification of values that are to be protected on ONFL generally.

As per TTatM, the concept of 'landscape' includes landscape character and visual amenity values, hence I agree that relevant biophysical, sensory and associative attributes would be appropriately identified to guide the protection of RCL values.

Considering the Strategic Objectives, and the complexity and intertwined relationship of attributes and values, it is appropriate they be bundled in the schedules. I therefore support the overall approach taken by council experts.

The landscape architects note (Gilbert para. 7.6) a mismatch between **SP 3.3.41** and the schedules drafted for RCL PAs. The s.32 states para. 3.10 that the schedules *"will clearly identify the values to be protected, maintained and/or enhanced by a proposed development that falls within the Priority Areas."* I have carefully considered this intent and the methodological direction in the various

provisions. I am in agreement with their analysis para 6.10 – 6.18 that bundling of landscape attributes and values is appropriate and is aligned with best practice. I thus support their recommendation at para. 6.16 regarding ONFL PA schedules.

Having considered the complexity of the provisions and the inevitable challenges in applying them, I agree with Gilbert para. 8.6 that the landscape architects drafting the schedules have “*ensured alignment (in so far as possible) between the schedule wording and policy direction for rural landscapes.*”

I have considered the draft schedules as appended by Ms Evans (S42A Appendix 1) including the draft Preambles as described by Ms Gilbert (EIC para. 7 - and adopted by Mr Head).

The council landscape architects note (Gilbert para. 6.27) that the PA Schedules methodology utilises TTatM and the Matakana decision. They note (EIC para. 3.11) that the schedule structures derive from PDP 3.3.37 – 3.3.41.

27. Considering the direction outlined above from the Proposed District Plan Ch 3. as has been confirmed by the Environment Court, I have reviewed the Variation prepared to give effect to this. Noting that the PAs have already each been mapped, I recognise the Variation as proposing the text for:

Schedule 21.22 for the list of ONFL PAs and

Schedule 21.23 for the RCL PAs.

28. PREAMBLE to 21.22 Schedule re ONFL PA

As per the August 2023 iteration, the suggested edits to the Purpose appear appropriate.

Regarding the Landscape Attributes and Values, considering the provisions that direct the drafting of the Schedule, I disagree with inserting the paragraph regarding pests. The pests are not attributes or values requiring protection or enhancement, quite the contrary. They are merely characteristics.

The inclusion of the pest paragraph in the Preamble, and the plant and animal pest text in individual schedules, is confusing and potentially counter-productive. To the contrary, disappointingly, whilst some references to existing natural successional species are included in the schedules (e.g. bracken, manuka and kanuka), there is no hint of the former or emergent forest type (e.g. beech podocarp forest) of these locales, yet such information is available www.landtyping.nzThe schedules (all)

require editing to delete the surplus references to landscape characteristics that do not comprise landscape values sought to be protected.

Regarding Landscape Capacity, a four-tier approach was included in the notified Schedules and a fifth is now proposed, adding *“very limited to no landscape capacity”*. For this overall PA rating, I assess that a 5-tier approach is likely appropriate. Perhaps, rather than the abbreviated letters currently used in the spreadsheet, it would be more user-friendly to reference the tiers by numbers. That is a numbered rating scale, with the greatest capacity rated 5, and the *“no landscape capacity”* as 1. The rating of attributes and values is of course very different from rating the landscape capacity, and the two should not be confused.

29. PREAMBLE to 21.23 Schedule re Upper Clutha RCL PAs.

I note the Preamble to 21.23 wrongly references ONFL. In the Purpose the first paragraph requires replacing. The first sentence requires replacement to address Upper Clutha RCL PAs. The second paragraph is suggested be amended rather than stating ‘plan development’ as a Schedule purpose.

Regarding the Preamble, re 3.3.39 – 3.3.41, Schedule 21.23 is to identify key physical, sensory and associative attributes that contribute to the landscape character and visual amenity values that are to be described and rated. I agree that, to be practical and address the task effectively, the attributes and values that contribute to landscape character and visual amenity should be bundled for their identity, description and ratings.

The paragraph addressing *“Landscape character and visual amenity values ...”* should be deleted excepting the first sentence. Landscape character and visual amenity both overlap into the three dimensions of landscape. To limit visual amenity to perceptual is an inappropriately narrow Eurocentric approach.

Noting from experience that landscape character and visual amenity values that need to be maintained and enhanced may depend on attributes that are more absent than present – open space, undefined, vehicle-free, quiet, treeless, structure-free—the absence may be important in contributing to landscape character and visual amenity. The key physical, associative and sensory attributes contributing to values are to be identified, described and rated. Focused on attribute presence, the RCL Schedules do not as yet provide the valued absence information adequately.

Ms Evans para 14.1 references *“rating scale”*. I recognise that the provisions require that attributes be rated, and a 7-point scale is proposed. Given the interrelationships of attributes and values, it would be appropriate to bundle attributes and values and rate them on a 7-point scale.

It is suggested the proposed five-tier Landscape Capacity approach might be more tuned to addressing the RCL PA regime. As is clear in the final paragraph, the section has merely been duplicated from that proposed for addressing ONFL PAs. The final sentence in the Preamble appears also to require editing to better address an assessment for an activity in a RCL PA.

Obviously not drafted to actually address the RCL PAs, the Schedule 21.23 Preamble in my opinion requires some editing to better structure and guide the use of the schedules.

Upper Clutha Basin – Landscape Priority Areas

Applying my analysis provided above, the Priority Areas of the ONFL and RCL of the Upper Clutha are each briefly addressed with regard to the council's proposed schedules which include landscape capacity ratings (August 2023).

For ONFL, in my opinion it is appropriate to delete the general characteristics and descriptions that are not attributes or values warranting protection in that PA. Thus I identify the schedule paragraph numbers for each PA that I consider need to be deleted. I also consider there is site-scale detail that clutters the schedules and requires deletion or redrafting to simplify to the landscape scale required.

For RCL, I recommend deletion of paragraphs/sentences/clauses that do not describe attributes or values that should be maintained or enhanced in the RCL.

Upper Clutha ONFL:

21.22.18	Cardrona Valley ONL PA (Head)
21.22.19	Mount Alpha ONL PA (Head)
21.22.21	West Wānaka ONL PA (Gilbert)
21.22.25	Hāwea South North Grandview ONL PA (Gilbert)
21.22.26	Lake Mackay Station and Environs ONL PA (Head)
21.22.10	Mt Barker ONF PA (Head)
21.22.11	Mt Iron ONF PA (Head)

UPPER CLUTHA ONL PAS

21.22.18 Cardrona Valley ONL PA

1. Physical Attributes and Values

In the Cardrona Valley ONL PA Schedule I support the text para. 1-8 regarding landforms and land types, and hydrological features. However para. 9 – 13 require significant amendment as they do not adequately or specifically address important ecological attributes and values of this landscape.

Para. 9a. notes the kanuka shrubland on the mountain slopes with no reference to forest succession. The tussock grasslands of the mid and lower slopes should be added to para. 9.

Para. 10 a. – e. does not list valued ecological aspects of this landscape and the entire paragraph should be deleted.

Para. 12 and 13 identify exotic pests only which is entirely inappropriate and should be deleted.

Para. 14 – 15 are overly detailed with site specificity. They should be refined. The roading does not contribute a physical landscape value and should be deleted.

Delete para. 16 and para. 19.

2. Associative Attributes and Values

Para. 30 requires amendment. Grazed high country tussocklands are pastoral farming thus delete 'a' and 'contrasting with pastoral farming'.

Para. 34. Add after grasslands 'and divaricating shrublands'.

3. Perceptual Attributes and Values

Para. 44. The natural colonizing vegetation should be recognised as evident progress toward native forest regeneration.

4. Summary of Landscape Values

The ratings are supported.

5. Landscape Capacity

The ratings are supported. However

- iv. Intensive Agriculture. Should recognise the need to retain naturalness, not just 'scenic views'.

21.22.19 Mount Alpha ONL PA

1. Physical Attributes and Values

I agree with para. 1 – 9.

Para 7 would be assisted by inserting '*naturally*' before *carry significant ...*

Para. 8 would be improved by replacing '*block*' with '*naturally impede*'.

Para. 10 does not address landscape values to be protected.

The natural forest succession occurring below 1,100 m should be addressed in para. 9., not in the mix in 10 a.

Para. 12, 13 and 15 should be deleted.

para. 16 requires refinement to separate the value from a description.

2. Summary of Landscape Values

The ratings are agreed. (a) should also recognise the native forest regeneration.

3. Landscape Capacity

The ratings are supported.

21.22.20 ROYS BAY ONL PA

1. Physical Attributes and Values

Para. 1 – 6 are supported.

Para. 7 wrongly addresses heritage features.

Para. 8, 9 and 12 involve descriptions, not important landscape values. Delete.

Para. 14 – 15 are too detailed and inappropriate at the required scale.

Para. 16 – 17 should be removed.

2. Perceptual Attributes and Values

Para. 43. Delete the reference to the conifer forest.

3. Summary of Landscape Values

The ratings are agreed.

4. Landscape Capacity

The ratings are agreed.

21.22.21 West Wānaka ONL PA

1. Physical Attributes and Values

Para. 12 c. should include recognition that the fernland and shrublands signal the regeneration of native forest.

Para. 13 c. should be relocated to heritage section.

Para. 18 – 19 involve recreational features and should be relocated.

Para. 22 – 23. Should be deleted.

2. Associative Attributes and Values

Surprisingly the clear distinction between bedrock and deposition country is not recognised.

Para 24. Requires amendment. Insert 'and Parkins Bay' after 'Glendhu Bay'. Delete the second sentence.

Para. 26. Delete. Already included in Recreation.

3. Perceptual Attributes and Values

Para. 58. Need to better recognise the legibility of bedrock versus depositional country, and the geomorphic processes.

Para. 65. Delete 'to a far lesser degree'.

Para. 68. Delete.

Para. 69. Delete a. to d. as they do not address natural landscape values.

Para. 78. A. delete '*created by the arrangement*'.

4. Summary of Landscape Values

The ratings are supported.

5. Landscape Capacity

The ratings are supported.

21.22.22 Dublin Bay ONL PA

1. Physical Attributes and Values

Para. 8 a. should recognise the succession process to native forest.

Para. 9 a. relocate to Heritage.

b. – d. delete.

Para. 10 delete.

Para. 11 Regenerating kanuka shrubland successional to native forest.

Para. 12. Delete.

Para. 13 Delete. Re-write regarding the overall value.

Para. 20. Delete, or amend to respectfully recognise the SILNA history of this moraine.

2. Summary of Landscape Values

The Associative and Perceptual values are both under-recognised. A High rating would be appropriate for both.

3. Landscape Capacity

The ratings are supported excepting regarding Forestry. I assess there is No capacity for exotic forestry in the Dublin Bay ONL PA.

1. Physical Attributes and Values

Para. 11. a. delete 'depleted'.

Para. 11 d. – f. and i. recognise succession to podocarp / beech forest.

Para. 12, 15 and 16. Delete.

Para. 28 – 29 Delete.

2. Perceptual Attributes and Values

Para. 58. Change 'plantings' to 'vegetation'.

Para. 59. Address bedrock v depositional.

3. Summary of Landscape Values

Ratings supported.

4. Landscape Capacity

The ratings are supported.

21.22.24 Lake McKay Station and Environs ONL PA

1. Physical Attributes and Values

Para. 6.a. delete last sentence. Luggate Creek spawning is in Para. 5 and in Recreation.

Para. 6. B. delete *'to a lesser extent in the'* and *'Other species associated with the shrublands include'*.

Para. 6. C. delete *'unsuitable for improved pasture', 'the' and 'the'*.

Para. 7. Delete.

Para. 9 and 10. Delete.

Para. 11 – 12. Delete and merely reference the pastoral land, not holdings and local detail.

Para. 13. Delete. Its in Recreation.

2. Summary of Landscape Values

The ratings are supported.

3. Landscape Capacity

The ratings are supported.

21.22.10 Mt Barker ONF PA

1. Physical Attributes and Values

Para. 2 and 3. is a descriptor of current mixed exotic and native cover. It inadequately recognises the landscape attributes and values. Revision is needed including the natural forest succession process of the lower slopes recognised.

Para. 5. Delete.

Para. 6. Delete.

2. Associative attributes and Values

Para. 13. Should recognise bedrock versus depositional lands.

5. Summary of Landscape Values

The ratings are supported.

6. Landscape Capacity

The ratings are supported.

21.22.11 Mt Iron ONF PA

1. Physical Attributes and Values
Delete the pest paragraphs.
2. Associative attributes and Values
Delete Paras 6 and 7 re pests.
3. Perceptual Attributes and Values
4. Summary of Landscape Values
5. Landscape Capacity

For **Upper Clutha RCL** the paragraphs addressing characteristics and mere descriptors rather than landscape character attributes and values or visual amenity values should be deleted, or at least significantly amended. They are unhelpful for guidance on the application of the schedules.

Whilst the schedules are to assess landscape character and visual amenity values that should be maintained or enhanced, the Landscape Values Ratings 7-point scale instead assesses the landscape values as if against the natural landscape and natural feature test.

I question the appropriateness of the assessment and Landscape Values ratings that result. That is, the RCL assessment methodology is questioned.

21.23.1 **Cardrona River/Mount Barker Road RCL PA**

Attributes and Values

Para. 8. Delete

Para. 13 – 14. Delete.

Landscape Values Ratings

The method of rating is questioned and the results in terms of landscape character and visual amenity are not accepted.

Landscape Capacity

The ratings proposed for each land use appear largely appropriate.

21.23.2 **Halliday Road / Corbridge RCL PA**

Attributes and Values

Para. 12 – 13. Delete.

Summary of Landscape Values

The ratings may be appropriate but I consider require review regarding the RCL intent.

Landscape Capacity

Ratings supported.

21.23.3 West of Hāwea River RCL PA

Attributes and Values

Para. 6 d. Delete

Landscape Values

The proposed ratings may be appropriate.

Landscape Capacity

Ratings supported.

21.23.6 Church Road – Shortcut Road RCL PA

Attributes and Values

Para. 6. Delete.

Landscape Values

Ratings supported.

Landscape Capacity

Ratings supported.

21.23.7 Maungawera Valley RCL PA

Attributes and Values

Para. 16. Shared and recognised values are not highway dependent. The Maungawera Valley is a valued landscape for many beyond local residents. A revision is needed to better address this place.

Para. 26 is very disappointing in not recognising the legible geomorphic system. A revision is needed.

Landscape Values

The Maungawera Valley PA has been under-rated in the summary.

There are high physical landscape values.

The associative values are moderate.

The perceptual values are high.

Landscape Capacity

x. Renewable energy generation is incorrectly rated. The capacity is very limited and any installation would need to not disrupt or detract from the landscape legibility and naturalness as enjoyed from lands and waters.

xi. Forestry capacity requires careful siting to not disrupt the landscape character and visual amenity of the valley landscape including of the geomorphic legibility and natural patterns, processes and elements.

xii. similarly this description is inadequate for addressing the landscape character and visual amenity of the valley.