

**Queenstown Lakes Proposed District Plan  
Section 32 Evaluation Report  
Variation to the Proposed District Plan**

**For:  
The Upper Clutha Landscape Schedules Variation**

**Report dated: October 2024**

## Contents

1. Summary of the Proposed Variation.....	2
2. Introduction .....	4
Purpose of the report .....	4
Background .....	4
Mata-au Clutha River Priority Area.....	5
3. Issue Definition / Resource Management Issues.....	6
4. Development of the Variation .....	7
Community/Stakeholder Engagement .....	7
Clause 34 Consultation .....	8
Consultation with Iwi Authorities .....	8
Consultation with Statutory Bodies .....	9
5. Methodology.....	11
Format of the proposed landscape schedules.....	12
Effect of Including Landscape Schedules in the PDP .....	12
6. Statutory Policy Context .....	13
National Policy Statements/National Environmental Standards.....	13
Regional Policy Statement .....	14
Iwi Management Plans.....	16
Proposed District Plan.....	16
7. Scale and Significance Evaluation .....	17
8. Evaluation of Proposed Objective(s).....	18
9. Evaluation of Proposed Provisions.....	18
10. Evaluation of Reasonably Practicable Options .....	19
11. Efficiency and Effectiveness.....	21
12. Most Appropriate Option .....	1
13. Conclusions .....	1
Appendix A – Proposed Policy Change .....	3
Appendix B1 – Proposed Pre-amble 21.23 .....	4
Appendix B2 – Landscape Schedules .....	5
Appendix C1 – Methodology Report.....	6
Appendix C2 – Methodology Report Appendices.....	7
Appendix D – Statutory Content.....	8
Appendix E – Clause 34 Feedback on Material Proposed to be Incorporated by Reference .....	9
Appendix F – Maps (Incorporated by Reference).....	10

## 1. Summary of the Proposed Variation

- 1.1. The purpose of the Upper Clutha Landscape Schedules Variation is to introduce one Priority Area (PA) Schedule, for the Clutha River Mata-Au, and 12 non-Priority Area Schedules, for areas within the Upper Clutha Basin. The new schedules will be included in Schedules 21.22 (1 schedule) and 21.23 (12 schedules) of Chapter 21 (Rural Zone) of the Queenstown Lakes District Council Proposed District Plan (PDP) (Upper Clutha Variation or Variation).
- 1.2. This Variation follows the Priority Area Landscape Schedules Variation to the PDP, which was notified in June 2022. The PA variation introduced 29 'Priority Area' landscape schedules to Chapter 21 (Rural Zone) and was the subject of Council decisions on 6 June 2024. The intention is that the PA and non-PA schedules proposed for inclusion in the PDP through this Variation will sit alongside the PA schedules confirmed by Council's 6 June 2024 decisions. The two variations are therefore distinct, and do not overlap, despite the approach taken to developing this Variation drawing on the earlier Variation, where relevant.
- 1.3. The objective of the Upper Clutha Landscape Schedules Variation is to:
  - a. implement the requirements of the PDP relating to PAs, through the introduction of a landscape schedule for the Mata-au Clutha River; and
  - b. better achieve the objectives and policies of Chapters 3 (Strategic Direction) and 6 (Landscapes – Rural Character) by providing detailed descriptions of the values to be maintained or enhanced for Upper Clutha RCLs that are not PAs.
- 1.4. The landscape schedules provide written material that assists to identify attributes, character, values, and capacity of an area. The landscape schedules will assist the Council and plan users with evaluating the appropriateness or otherwise of resource consent and plan change proposals within the extent of the mapped schedule areas.
- 1.5. The additional landscape schedules proposed to be introduced as part of this Upper Clutha Variation apply to the following areas:
  - a. Outstanding Natural Feature:
    - Mata-Au Clutha River (Priority Area)
  - b. Rural Character Landscapes (non-Priority Areas):
    - Mount Aspiring Road
    - Studholme Road
    - Riverbank Road
    - Wānaka Airport Environs
    - Northern End of Criffel / Pisa Range Foothills
    - Luggate
    - Sheepskin Creek
    - Kane Road and Luggate Tarras Highway

- Hāwea Moraine
- Hāwea Terrace
- Crosshill
- Quartz Creek and Maungawera

- 1.6. The Variation also includes an amendment to Strategic Policy (SP) 3.3.36 of Chapter 3 of the PDP (Strategic Directions) to include reference to the Mata-au Clutha River PA.
- 1.7. The Variation also amends the preamble to Schedule 21.23 to recognise that Schedule 21.23 includes both PA RCLs and non-PA RCLs.
- 1.8. The Variation is accompanied by maps, which are to be incorporated by reference, that depict the extent of the areas covered by each of the additional landscape schedules. The mapping of the Mata-au Clutha River PA has been confirmed by the Environment Court, following a section 293 process that involved landscape expert input,<sup>1</sup> and is not within the scope of this Variation (other than its proposed incorporation by reference into the PDP).
- 1.9. The accompanying maps for the non-PA RCL landscape schedules are proposed to be incorporated into the PDP by reference and the Council has consulted on these maps separately, in accordance with the requirements of Clause 34 of Schedule 1 of the Resource Management Act 1991. The feedback received as a result of this consultation, and a summary of the Council's response, is attached in Appendix E.

1 2022 NZEnvC 198 and [2022] NZEnvC 244.

## 2. Introduction

### Purpose of the report

- 2.1. This report fulfils the requirements of Section 32 of the Resource Management Act 1991 (the Act or RMA). Section 32 of the Act requires the objective(s) of proposals to be examined for their appropriateness in achieving the purpose of the Act, and the policies and methods of those proposals to be examined for their costs, benefits, efficiency, effectiveness, and risk in achieving the objectives. This report should be read together with the text of the proposed landscape schedules and amendment to SP 3.3.36 of Chapter 3 Strategic Direction.

### Background

- 2.2. As noted above, this Variation follows the 'Priority Area Landscape Schedules Variation' to the PDP, which was subject to submissions and a decision of the Council on 6 June 2024.
- 2.3. The Priority Area Landscape Schedules Variation introduced landscape schedules for 24 PAs within Outstanding Natural Landscapes and Features (ONL/F) and 5 PAs within Rural Character Landscapes (RCLs) in order to give effect to the strategic objectives and policies in Chapter 3 of the PDP.
- 2.4. The Priority Area Landscape Schedules Variation was prepared to implement Strategic Policy (SP) 3.3.42, which required the Council to notify a plan change to implement the following:
- a. SP 3.3.36 (identify specified Rural Zone PAs within the ONFs and ONLs in Schedule 21.22);
  - b. SP 3.3.37 (describe the landscape attributes, landscape values and related landscape capacity for subdivision use and development activities);
  - c. SP 3.3.39 (identify specified Rural Zone PAs within the Upper Clutha RCLs in Schedule 21.23); and
  - d. SP 3.3.40 (describe the landscape attributes, landscape character and visual amenity values and related landscape capacity for subdivision use and development activities).
- 2.5. The above SPs were introduced into the PDP by the Environment Court<sup>2</sup>. The Environment Court's decision was the result of appeals on Stage 1 of the District Plan Review relating to the management of landscapes in the Rural Zone.
- 2.6. In summary, the Environment Court decided that requiring the protection of the landscape values of ONL/Fs, and the maintenance of landscape character and the maintenance or enhancement of visual amenity values of RCLs, without specifying what those values were, did not provide enough certainty to ensure the policy direction of the PDP (and in turn sections 6 and 7 of the Act) was achieved. The Environment Court therefore directed that the landscape

2 Commencing with [2019] NZEnvC 205.

values of ONF/Ls, and the landscape character and visual amenity values of RCLs, should be identified and included in schedules in the PDP.

2.7. The Environment Court acknowledged that it would be a significant undertaking to identify the values of all of the landscape because 97% of the District is classified as ONF/L. Rather, the Court went through a process with the landscape architects and planners involved in the hearing and identified the 29 PA landscapes to be included in the schedules first. A number of criteria were considered, with one of the key criteria being where development pressure may be more likely, which may in turn result in cumulative effects on these landscapes.

2.8. The Upper Clutha Landscape Schedules Variation proposes to amend the PDP by:

- a. Introducing additional landscape schedules for one PA, and 12 non-PA RCLs to Schedules 21.22 and 21.23 to Chapter 21 (Rural Zone);
- b. Amending Strategic Policy 3.3.36 of Chapter 3 (Strategic Directions) to include reference to Mata-au Clutha River PA;
- c. Amending the pre-ambule to Schedule 21.23 to remove reference to 'Priority Areas'/PAs and refer to RCLs more generally to recognise that schedule 21.23 includes PAs and non-PA areas; and
- d. Incorporating by reference the mapping for the 12 non-PA areas in the Upper Clutha basin, and the mapping for the Mata au Clutha River PA (using the same approach as with the PA mapping).

2.9. It was originally intended that all RCLs (both PA and non-PA) would be included as part of the Priority Area Landscapes Variation. However, the Council was required to notify the Variation by a specific date, and further time was required to ensure that identification and description of landscape values for the remaining non-priority areas of the Upper Clutha was undertaken in a robust way.

2.10. The landscape schedules have been prepared using the same methodology that was used for the PAs, as described in Chapter 3 of the PDP. This relates to the Values Identification Framework (VIF) specified in policies SP 3.3.36 to 3.3.38 (for ONL/Fs), SP 3.3.39 to 3.3.40 (RCLs) and SP 3.3.41 (both ONL/Fs and RCLs).

### Mata-au Clutha River Priority Area

2.11. The Mata-au Clutha River PA was originally intended to be notified as part of the Priority Area Landscapes Variation. However, Council was directed to amend the PDP maps to categorise Mata-au Clutha River as an ONF (not an ONL) and to amend the ONF boundary so that it reflected the escarpments on either side of the river<sup>3</sup>.

3 [2022] NZEnvC 244.

2.12. This work was directed at the same time as the Priority Area Landscapes Variation and was not completed by the time the schedules were notified (as directed by SP 3.3.42). This led to delays in finalising the boundaries for the Mata-au Clutha River PA, which meant that it could not be notified with the other PAs, and would instead be notified as part of the Upper Clutha Variation.

### 3. Issue Definition / Resource Management Issues

3.1. This Variation relates to strategic issues 2 and 4 in Chapter 3 Strategic Directions of the PDP. These are set out below:

- *Strategic Issue 2:*
  - *Strategic Issue 2: Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscapes, particularly its outstanding natural features and outstanding natural landscapes.*
- *Strategic Issue 4:*
  - *Some resources of the District's natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District's economy.*

3.2. The Environment Court<sup>4</sup> has previously identified that it is difficult to protect the landscape values of ONL/Fs, and maintain the landscape character, and maintain or enhance visual amenity values of RCLs without first identifying those values.

3.3. By outlining the values to be protected for ONL/Fs, and the visual amenity values to be maintained or enhanced for RCLs, it provides more certainty to achieve the policy direction. It is also more efficient and effective to identify these values at the district plan level rather than leave the identification of these values to a case-by-case assessment via individual resource consent applications.

3.4. Further, listing the additional RCLs would result in a more consistent approach to maintaining and enhancing landscapes across the Upper Clutha Basin (i.e., consistency with the RCL PAs) and how these values are considered within a particular RCL.

<sup>4</sup> [2019] NZEnvC 160.

## 4. Development of the Variation

### Community/Stakeholder Engagement

- 4.1. The Council consulted on non-PA RCLs as part of the Priority Area Landscapes consultation, and then again as part of a separate consultation process for the Upper Clutha Landscapes that are now being considered in this variation.
- 4.2. The purpose of both consultations was to gather the community's perspective on the values associated with landscapes of the Upper Clutha. This feedback was then used to help inform the values and attributes that accompany each of the landscape schedules. The feedback sought was on what values were associated with each of these landscape areas.
- 4.3. The first round of consultation was undertaken via the Council's Let's Talk page from the 9<sup>th</sup> of March 2022 to the 3<sup>rd</sup> of April 2022. Feedback was sought on 29 PAs, but also on the non-PA RCLs which were classified as 'all other Upper Clutha RCL areas'. The online consultation received eight responses relating to non-PA RCLs, with all other responses relating to identified PAs (although none were specific to the Mata-au Clutha River PA).
- 4.4. On the 4<sup>th</sup> of July 2023, the Council hosted a community drop-in session for members of the public to speak with Council staff about the values they associated with the non-PA RCLs and the and the Mata-au Clutha River PA. No specific questions were asked, but mapped areas were provided for each of the areas and the community invite to provide comments on the values they associated with each landscape. Over the course of the evening several people attended the session. While some provided feedback, others sought general information about the intended approach for mapping and identifying the values of RCLs.
- 4.5. An online consultation for the Upper Clutha Landscape Schedules was undertaken between the 22<sup>nd</sup> of June 2023 and the 6<sup>th</sup> of August 2023 via the Council's Let's Talk page. The community were again invited to provide comment on the values of non-PA RCLs and Mata-au Clutha River PA via the Council's Let's Talk page.
- 4.6. A total of 13 people provided feedback on the landscape areas during both the online consultation and drop-in session. These have been categorised into broad themes which are summarised in the table below:

Table 1: Summary of comments received for consultation undertaken as part of the Upper Clutha Landscapes Variation

Theme	Summary of comments received
Scenery and Landscape Values	Comments seeking protection of important scenic views or landscape values which were both specific to landscape areas or more general comments relating to the Upper Clutha area.
Management of Development	Comments seeking management of development or further development controls to protect important landscape values.



Methodology	Comments relating to the methodology of preparing the schedules (i.e., seeking that the VIF be used for non-PAs), and opposing the consultation methods and information used.
Protection of Waterbodies	Comments seeking protection of water bodies and riparian margins.
Rural Values	Comments seeking protection of high-quality soils. Acknowledgement of other features of the rural environment such as shelter belts, and outbuildings in the landscape
Other	Comment relating to rural living (and the need to provide for low density residential in the schedules) and a request for a specific area to be classified as an ONF.

4.7. The feedback provided through consultation (where relevant) was then used by the landscape team to help inform the content of the draft schedules to be notified. The summaries of the feedback received are set out in Appendix C2.

### Clause 34 Consultation

4.8. As noted above, the Upper Clutha Landscape Schedules Variation is accompanied by maps which are to be incorporated by reference. These maps depict the area associated with a particular landscape schedule.

4.9. One of the process steps under Clause 34, Part 3 of Schedule 1 requires that Council consult the public on a proposal to incorporate material by reference. This requires that Council allow a reasonable opportunity for persons to comment on the proposal to incorporate material by reference and then to consider any comments they make.

4.10. Council sought feedback on this material via its Let's Talk page between 19 August 2024 and 30 August 2024. This process has led to a number of amendments to the mapping, and text of specific landscape schedules. The feedback received, and Council's response to this feedback (and a description of any resulting changes, where relevant) is set out in Appendix E of this report.

4.11. As part of finalising the notification material, following Clause 34 consultation Council staff completed a full review of the Mata-au Clutha River mapping to ensure that the PA boundary aligned with the ONF mapping in the PDP Planning Maps. One minor change was made to the PA mapping prior to notification.

### Consultation with Iwi Authorities

4.12. Clause 3(1)(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan. Council has engaged with Kai Tahu via their representatives (Aukaha and Te Ao Marama) as part of the development of this variation.

4.13. This engagement included a hui attended by Rūnaka, Aukaha, the QLDC Policy Team, and a member of the Landscape Project Team. This was not specific to the Upper Clutha Landscapes Variation, but the landscape schedules project in general. Further, iwi were provided with copies of the draft RCL schedules for comment and inclusion of values.

4.14. The landscape schedules include statements of values from mana whenua. Feedback from local iwi identified that the rating of values is problematic from a mana whenua perspective where all aspects of the natural world are interconnected. Policy 3.3.38 and Policy 3.3.41 direct the rating of attributes and so ratings have been applied within the landscape schedules. However, ratings have not been applied to mana whenua values.

4.15. It is noted that Ngāi Tahu ki Murihiku have contributed to the schedules through collaboration with Kāi Tahu ki Otago. The principles and extent of their collaboration is set out in the statement below.

#### Āpiti Hono Tātai Hono – Ngāi Tahu ki Murihiku Assessment Methodology

4.16. Ngāi Tahu ki Murihiku deem all landscape to be significant, given that in Te Ao Māori, whakapapa and whenua are intertwined. The question is not how significant is a landscape, but what is held within that landscape. To answer that question consideration is needed of whakapapa, mana, kawa, tikanga and mātauranga alongside identity, connections, practices, history, and future aspirations. These considerations are the context within which to determine what is appropriate for that landscape and to describe the relationships held with the whenua.

4.17. As part of identifying and describing what 'cultural landscape' is to Ngāi Tahu ki Murihiku - Āpiti Hono Tātai Hono was developed<sup>5</sup>. This methodology curates an intrinsic assessment process, focusing on the interwoven relationship between Ira Atua and Ira Tangata and the continuum of time and whakapapa and authentically expresses the philosophies and paradigms of Ngāi Tahu ki Murihiku. Stage 1 of this assessment study which expresses the methodology was endorsed by Ngāi Tahu ki Murihiku and the Te Ao Marama board in January 2022.

4.18. Ngāi Tahu ki Murihiku contributed to the schedules by collaborating with Ngāi Tahu ki Otago to insert key references to values and relationships that are held across all landscape. This was in part to point to deeper, broader and more authentic expression of relationship that Ngāi Tahu ki Murihiku have expressed through the Āpiti Hono Tātai Hono methodology.

#### Consultation with Statutory Bodies

4.19. Clause 3(1) of the First Schedule of the RMA also requires local authorities to consult with:

- a. the Minister for the Environment;
- b. those other Ministers of the Crown who may be affected by the policy statement or plan;

<sup>5</sup> Āpiti Hono Tātai Hono: Ngā Whenua o Ngāi Tahu ki Murihiku Stage 1 Southland Cultural Landscape Assessment Study

- c. local authorities who may also be affected; and
- d. any customary marine title group in the area, that may be affected by changes made to the District Plan.

4.20. The above consultation has been undertaken where required. The Minister for the Environment was invited to provide feedback, but no response was received. No other Ministers of the Crown were determined to be affected.

4.21. Consultation was undertaken with Central Otago District Council as a neighbouring local authority of the Upper Clutha, but it was determined that they were not affected by the Variation. No other territorial authorities were determined to be affected by the Proposed Variation. Lastly, given that the Queenstown Lakes District is not located near the coastal marine area, there are no customary marine title groups that are affected.

4.22. Otago Regional Council (ORC) was determined to be affected by the Variation. ORC is responsible for administering the Otago Regional Policy Statement and also for operating and maintaining various assets and infrastructure across the District. Table 2 below sets out the feedback received from ORC.

Table 2: Feedback from ORC on the Upper Clutha Landscapes Variation

Feedback	Comment
<p>ORC noted that they own and maintain the Albert Town Rock Buttress located within the Mata-au Clutha River landscape area.</p> <p>ORC noted that the draft landscape schedule provided did not reflect the importance of the Albert Town Rock Buttress as regionally significant infrastructure. The purpose of the Albert Town Rock Buttress is to mitigate the risk of erosion and land movement.</p> <p>ORC considered that this was not sufficiently aligned with the Proposed RPS 2021, in that it did not identify the need to balance enabling operation, maintenance, upgrade, and development of regionally significant infrastructure while balancing social economic well-being values with avoiding or minimising adverse effects to the environment.</p> <p>ORC sought provision v. (earthworks) of the landscape capacity section to be reworked to align and assist interpretation of district plan rules to give effect to the RPS.</p> <p>ORC noted that the landscape schedules otherwise gave effect to the identification requirements for ONL/Fs in the pRPS.</p> <p>ORC noted that their assessment only considered whether the identification of areas and values would achieve RPS and pRPS requirements, and not whether the provisions will protect the</p>	<p>The Albert Town Rock Buttress in the Mata-Au Clutha River Landscape Schedule is specifically acknowledged, and the associated works have been given the highest capacity rating, 'some capacity'.</p>

values identified within the schedules. Further noted that this would ultimately depend on the policy framework in the PDP.	
---	--

## 5. Methodology

- 5.1. As noted above, the Upper Clutha Landscape Schedules have been prepared using the same methodology as the Priority Area Landscape Schedules. The method used for the schedules is set out in the methodology statement included in Appendix C1 to this report.
- 5.2. Appendix C1 specifically addresses the method used for landscape capacity that is specific to the schedules. Further, the landscape schedules were amended following the Priority Area Landscape Schedules Hearing to ensure alignment between the Priority and non-PA landscape schedules.
- 5.3. As well as identifying the Priority Areas to be included in the landscape schedules, the Environment Court prescribed a Values Identification Framework (VIF) which set out in Chapter 3 of the PDP in Policies SP 3.3.36 to SP 3.3.41. The VIF has also been used in preparing the schedules that are the subject of this Variation.
- 5.4. In addition to the VIF, the policies require best practice landscape assessment methodology be used for the identification of landscape values, landscape character, and visual amenity values. This proposal has adopted best practice landscape assessment methodology through the guidance of Te Tangi a Te Manu (TTatM).
- 5.5. Landscape capacity is the ability for subdivision, use, or development to be absorbed in such a way that identified landscapes values are not compromised for ONFs and ONLs, or identified landscape character and visual amenity for RCLs.<sup>6</sup> TTatM does not provide guidance on assessing landscape capacity. For the landscape schedules, a scale of some landscape capacity, limited landscape capacity, very limited landscape capacity, extremely limited landscape capacity, and extremely limited or no landscape capacity has been used to record the assessed landscape capacity.
- 5.6. The Mata-au Clutha River Landscape Schedule was prepared with the other PA landscape schedules. For the remaining non-PA RCLs, these were prepared by a landscape architect and then peer reviewed. The VIF and best practice methodologies were applied, and public consultation (discussed in further detail above) was also used to inform the content of the schedules. Mana whenua representatives provided input on mana whenua values (discussed further below). Input was also provided by experts from other related specialities listed below:
  - a. Ecology;
  - b. Tourism and Recreation;

6 3.1B.5b

- c. Archaeology and heritage; and
- d. Geomorphology.

### Format of the proposed landscape schedules

- 5.7. The schedules follow the same format as the PA Landscape Schedules to ensure a consistent approach to managing landscapes within the PDP.
- 5.8. The Mata-au Clutha River Landscape Schedule has been prepared in accordance with SP 3.3.38 (due to it being a PA), and sets out the following information:
- a. Identification and description of the key physical, associative and perceptual attributes that contribute to the values of the ONF that are to be protected;
  - b. Rating of the attributes identified, using a seven-point scale rating from Very Low to Very High; and
  - c. The related landscape capacity for a number of listed subdivision, use, and development activities and any others considered relevant to that area.
- 5.9. The same approach has been used for non-PA RCLs notified as part of this Variation.
- 5.10. The three concepts defined in 5.7 (a) to (c) are expressed through the 'three dimensional' structure of the schedules and implement the VIF and principles set out for landscape in TTatM. TTatM sets out the landscape assessment methodology adopted by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA TPO) for assessment of landscape values. A full explanation of the approach taken is set out in the Methodology Statement (Appendix C1).

### Effect of Including Landscape Schedules in the PDP

- 5.11. Including the schedules within Chapter 21 of the PDP will provide greater certainty in policy direction for landscape management within the PDP. It will also help to achieve Strategic Objectives (SO) 3.2.5.2 which directs that for ONL/Fs, their values are protected, and SO 3.2.5.5 which directs that for RCLs, landscape character is maintained, and visual amenity values are maintained or enhanced.
- 5.12. The schedules provide clarity on what is sought to be maintained, or enhanced within each identified non-PA RCL schedule area, by identifying the landscape character and visual amenity values. This provides more detail to support the policy framework. The schedules provide certainty that the landscape outcomes set out in Chapter 3 of the PDP will be achieved.
- 5.13. The schedules are not linked to a particular rule(s) and they will not introduce any new type of resource consent. The consenting framework for the rural zones remains the same. Instead, the schedules will assist with the assessment of land use and subdivision resource consent applications in the landscape areas. They will clearly identify the values to be protected, maintained and/or enhanced by a proposed development that falls within RCLs or the Mata-au Clutha River.

- 5.14. The schedules intend to provide better management of cumulative effects on landscape values, via the concept of landscape capacity. Each schedule identifies the capacity of a landscape to absorb changes resulting from new subdivision and development without compromising the identified values. The pre-ambles for the landscape schedules help to guide the use of the schedules, particularly with regard to landscape capacity.
- 5.15. The schedules will be relevant for all resource consent applications located within RCLs, where the provisions in Chapter 3 and Chapter 21 direct that the schedules apply to that application.
- 5.16. The landscape schedules for non-PA RCLs stand alone within the PDP and do not change or alter any other overlays, zones, or mapping notations. For example, the landscape schedules do not change how wāhi tupuna are applied through the PDP and do not affect existing Statutory Acknowledgement Areas (such as the Mata-au Clutha River). As noted throughout, the intended purpose of the schedules is to guide resource consents and plan changes.

## 6. Statutory Policy Context

- 6.1. The relevant requirements of the RMA, the Local Government Act 2002, the Operative Regional Policy Statement, the Regional Policy Statement Decisions Version, and the two iwi management plans that apply in the District have been given appropriate regard in the preparation of this proposal.

### National Policy Statements/National Environmental Standards

- 6.2. There are two relevant National Policy Statements and one relevant National Environmental Standard for this Variation. These include the National Policy Statement for Highly Productive Land (NPS-HPL), the National Policy Statement for Electricity Transmission (NPS-ET), and the National Environmental Standards for Commercial Forestry (NES-CF).
- 6.3. Under Section 75(3)(a) the Proposed District Plan must give effect to any national policy statement. The relevant national policy statements identified are outlined below.

#### *National Policy Statement for Highly Productive Land*

- 6.4. The NPS-HPL sets out objectives and policies to protect highly productive land for productive purposes. This includes a requirement to map and identify areas of highly productive land and include these in regional policy statements and district plans. ORC has worked with QLDC to identify highly productive land within the District and the transitional mapping has identified that areas of the Upper Clutha contain highly productive land.
- 6.5. This Variation does not include any provisions that would compromise the purpose of the NPS-HPL. Further, the Variation does not introduce any new rules or standards that would change the policy approach to rural landscapes. Therefore, the landscape schedules do not create any inconsistencies with the NPS-HPL.

### *National Policy Statement for Electricity Transmission*

- 6.6. The NPS-ET sets out objectives and policies to enable the management of the effects of the electricity transmission network under the Resource Management Act 1991.
- 6.7. The landscape schedules provide for infrastructure that has a functional and operational need to be located within RCLs, and so it is considered that the Variation gives effect to the NPS-ET.

### *National Environmental Standard for Commercial Forestry*

- 6.8. The NES-CF provides nationally consistent regulations to manage the environmental effects of forestry. It applies to both plantation forestry and exotic continuous-cover forests deliberately established for commercial purposes.
- 6.9. This Variation does not introduce any new rules or standards and so does not change the management of commercial forestry. The landscape schedules do not outline how commercial forestry should be managed. The schedules are a descriptive tool to help guide decision-making. Therefore, the landscape schedules do not create any inconsistencies with NES-CF.

### *Regional Policy Statement*

- 6.10. Section 75(3)(c) of the RMA requires a district plan to give effect to any regional policy statement. Further, under Section 74(2)(i) when preparing or changing a district plan, a territorial authority is required to have regard to any proposed regional policy statement.
- 6.11. In the Otago Region, there are two regional policy statements that are relevant. This includes the Operative Otago Regional Policy Statement 2019 and the Regional Policy Statement Decisions Version (RPS-DV).
- 6.12. At the time QLDC consulted with ORC on the draft landscape schedules, the RPS-DV had not yet been notified, and the proposed Regional Policy Statement (pRPS) applied.
- 6.13. In Clause 3 consultation with ORC (outlined above) feedback was provided that noted that the wording of one landscape schedule did not sufficiently align with the pRPS to reflect the importance of the Albert Town Rock Buttress, which meets the definition for Regionally Significant Infrastructure. However, the relevant landscape schedule already specifically references this infrastructure, and provides for the associated earthworks with 'some landscape capacity' which is the highest capacity rating. It was therefore considered that this approach gave effect to the pRPS.
- 6.14. No other matters were raised by ORC in relation to the pRPS or as part of Clause 3 consultation for the Variation. An assessment against the relevant provisions of both the regional policy statements (the Operative RPS and the RPS-DV) is outlined below.

### Otago Regional Policy Statement 2019

- 6.15. The Otago Regional Policy Statement 2019 (RPS) became fully operative on 4 March 2024. The RPS contains several relevant objectives, policies and methods which are relevant to the Upper Clutha Landscapes Variation.
- 6.16. Schedule 3 of the RPS sets out the criteria for identification of outstanding natural features, landscapes and seascapes, and highly valued natural features<sup>7</sup> and landscapes. Further, Policy 3.2.3 of the RPS requires identification of areas and values of outstanding natural features, landscapes and seascapes using the attributes in Schedule 3. This is also a requirement of Policy 3.2.5, but for natural features, landscapes and seascapes which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding.
- 6.17. The landscape schedules have been prepared in accordance with Schedule 3 of the RPS. They outline the various biophysical, sensory, and associative attributes associated with each specific landscape area for both the ONF and the RCLs. It is considered that as notified, the landscape schedules give effect to Policies 3.2.3 and 3.2.5, and Schedule 3 of the RPS.
- 6.18. Policy 3.2.4 of the RPS requires protection, enhancement and restoration of outstanding natural features and landscapes through a range of measures. Further, the RPS also has requirements for the maintenance and enhancement of highly valued natural features and landscapes, also through a range of measures through Policy 3.2.6.
- 6.19. The existing policy approach (i.e., approach to protecting ONL/Fs and maintaining/enhancing RCLs) in the PDP is not changed by the Variation. The PDP already requires the protection of landscape values for ONL/Fs, and the maintenance and enhancement of visual amenity values for RCLs. The landscape schedules will help to better achieve the current policy framework by outlining the values to be protected or maintained and enhanced. It is considered that the Variation gives effect to Policies 3.2.4 and 3.2.6 of the RPS.

### Regional Policy Statement Decisions Version (RPS-DV)

- 6.20. On 27 March 2024 the Otago Regional Council made decisions on the freshwater and non-freshwater planning instruments of the proposed Otago Regional Policy Statement 2021. The RPS-DV includes requirements relating to outstanding natural features and landscapes. NFL-P1 of the RPS-DV requires identification of the areas and values of outstanding natural features and landscapes in accordance with Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines<sup>7</sup>.

<sup>7</sup> In the RPS, 'highly valued natural features, landscapes and seascapes are "...those which have values that are of significance under Sections 6(a) 6(c) 7(c) and 7(f) but are not 'outstanding natural features and landscapes under Section 6(b) of the RMA.'"



- 6.21. NFL-P2 requires that ONL/Fs are protected from inappropriate subdivision, use or development. This is to be done by avoiding exceeding the landscape capacity, maintaining the values that contribute to the natural feature or landscape being considered outstanding (even if those values are not themselves outstanding), and avoiding, remedying, or mitigating adverse effects. Lastly, the RPS-DV requires that adverse effects of infrastructure on ONL/F values are managed in accordance with specific requirements.
- 6.22. NFL-M1 sets out requirements for the identification of ONL/Fs, contains requirements to include a statement of landscape capacity and also requirements to collaborate with Kāi Tahu to identify landscapes of significance to Kāi Tahu (in accordance with tikaka). NFL-M1 also includes requirements to work across jurisdictional boundaries and to prioritise landscapes that are likely to contain ONL/Fs that will face development or growth pressure across the life of the RPS-DV.
- 6.23. NFL-M3 requires territorial authorities to prepare and amend their districts plan to control subdivision, use and development of land and the use of the surface of water bodies to protect ONL/Fs and manage wilding conifer spread. NFL-M4 encourages local authorities to consider the use of other mechanisms or incentives to assist in achieving landscape outcomes.
- 6.24. The existing policy framework already protects ONL/Fs from inappropriate subdivision, use and development and the schedules already include a statement of landscape capacity. Further, the introduction of the schedule for Mata-au Clutha River will ensure that it is clear what values of this landscape need to be protected. As noted in Section 4 of this report, Council has worked with Kāi Tahu via their iwi authorities as part of the development of the Variation. It is considered that the Variation therefore gives effect to the RPS-DV.

## Iwi Management Plans

- 6.25. There are two relevant iwi management plans in the District. These are:
- a. Kai Tahu ki Otago Natural Resource Management Plan 2005;
  - b. Te Tangi a Tauria – The Cry of the People
- 6.26. The preparation of this Variation has had regard to these two documents. Further, the policy approach that has informed the objective of this proposal has been informed by these documents.

## Proposed District Plan

- 6.27. The following chapters of the PDP are relevant to this Variation:
- a. Strategic Direction – Chapter 3;
  - b. Tangata Whenua - Chapter 5;
  - c. Landscape and Rural Character – Chapter 6; and
  - d. Chapter 21 – Rural Zone.

- 6.28. The relevant objectives and policies have been set out in Appendix D of this report. For completeness, all these chapters of the District Plan cover both Volume A (reviewed land) and Volume B (unreviewed land), as set out in 1.1B of the PDP.
- 6.29. As set out above, Chapter 3 directs that landscape schedules be prepared for the PAs using the VIF. This same approach has been used to prepare the non-PA RCLs.
- 6.30. Mana whenua values are an aspect of these landscapes that need to be considered. Council worked with mana whenua throughout the development of the Variation to ensure that these values were included in the landscape schedules.
- 6.31. Chapter 6 provides detail as to how the landscape (particularly outside urban settlements) will be managed in order to implement the Strategic Objectives and Policies in Chapter 3. This includes more detailed policies for landscapes and rural character.
- 6.32. As noted throughout, only a minor amendment to SP 3.3.36 (in addition to the PA and RCL landscape schedules and pre-ambles amendments) is included to specifically reference the Mata-au Clutha River.

## 7. Scale and Significance Evaluation

- 7.1. The level of detailed analysis undertaken for the evaluation of the proposed objectives and provisions has been determined by an assessment of the scale and significance of the implementation of the proposed provisions. In making this assessment, regard has been had to the following, namely whether the proposed provisions:
- a. Result in a significant variance from the existing baseline in Chapter 3, 6 and 21 of the PDP;
  - b. Have effects on matters of national importance;
  - c. Adversely affect those with specific interests;
  - d. Involve effects that have been considered implicitly or explicitly by higher order documents;
  - e. Impose increased costs or restrictions on individuals, communities or businesses.
- 7.2. The level of detail in this evaluation report is considered to correspond to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposed Variation. In this case, the scale and significance of the proposal is considered **moderate**. This is because the proposal relates to one Outstanding Natural Feature and 12 Rural Character Landscapes. Outstanding Natural Features are matters of national importance under s6(b) of the RMA. Further, Rural Character Landscapes need to be given particular regard under s7(c) of the RMA.
- 7.3. The protection of ONL/Fs or maintenance and enhancement of RCLs is recognised as having potential for district wide effect. For example, the visitor economy may rely on the special landscapes of the District. The proposal may impact property owners, although this may be

positive with the schedules providing greater clarity of what is intended through the policies that seek to protect or maintain landscape values and character.

- 7.4. The evaluation has recognised the scale and significance of the proposal through the use of a team of experts to inform the landscape schedules, and engagement with mana whenua and the community.

## 8. Evaluation of Proposed Objective(s)

- 8.1. Section 32(1)(a) requires an examination of the extent to which the proposed objectives of the proposal are the most appropriate way to achieve the purpose of the Act. The purpose of the Act is to promote the sustainable management of natural and physical resources, as set out in Section 5.
- 8.2. This Variation does not introduce any new plan objectives or change any existing objectives in the PDP. Therefore, in this case, the proposed objectives of the proposal are the purposes of the proposal, and an examination of the extent to which those objectives / purposes are the most appropriate way to achieve the purpose of the Act is required (as set out in s32(6)).
- 8.3. There are two parts to the assessment of the appropriateness of the objectives / purpose of this proposal. These are as follows:
- a. assessment against the strategic objectives and policies of the PDP, which themselves achieve the purpose of the Act; and
  - b. assessment in terms of its relevance, usefulness, reasonableness, and whether it will achieve sustainable management, compared to the status quo.
- 8.4. As noted above, the purpose of this Variation is to implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 of the PDP for PAs (i.e., for the Mata-Au Clutha River). Further, the purpose of this Variation is also to introduce additional landscape schedules for RCLs in the Upper Clutha to better identify the values that need to be maintained or enhanced. By specifying the values to be maintained or enhanced in the landscape schedules, the objectives and policies of the PDP are better able to be achieved.

## 9. Evaluation of Proposed Provisions

- 9.1. The provisions of the proposal are the amendment to SP 3.3.36, the additional landscape schedules, and the amendment to the pre-amble for schedule 21.23. These are set out in Appendix A, Appendix B1, and Appendix B2 below.
- 9.2. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objective or purpose of the proposal. This assessment must:
- a. identify other reasonably practicable options for achieving the objectives;

- b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the proposed provisions;
- c. summarise the reasons for deciding on the proposed provisions; and
- d. the assessment of the proposed provisions against the objectives requires an assessment against the purpose of the proposal, and also against the relevant objectives of the PDP (in accordance with s32(3)). The relevant objectives of the PDP are identified in Appendix D of this report.

## 10. Evaluation of Reasonably Practicable Options

10.1. Council has identified three reasonably practicable options for achieving the objectives. These are as follows:

- a. Option 1: Do not list any additional landscape schedules in the PDP;
- b. Option 2: List the Mata-au Clutha River PA in Schedule 21.22 and make associated amendments, but do not list any other additional RCLs into Schedule 21.23; and
- c. Option 3: List the Mata-Au Clutha River PA in Schedule 21.22, and the 12 additional schedules for the RCLs in Schedule 21.23, and make associated amendments.

10.2. The following table assesses how well the options achieve the objectives of the Proposal:

Table 3: Assessment of Reasonably practicable Options Against the Objectives

<b>Objectives:</b>	
<ul style="list-style-type: none"> <li>• <i>To implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 of the PDP for identified Priority Area Landscapes.</i></li> <li>• <i>To better achieve the landscape outcomes of the PDP relating to RCLs by identifying the visual amenity values to be maintained or enhanced and related landscape capacity in schedules.</i></li> </ul>	
<b>Option</b>	<b>Achieves objective?</b>
<b>Option 1:</b> (Status quo)  Do not list any additional landscape schedules in the PDP.	It is considered that not listing any landscape schedules would not achieve the objectives, in particular for the Mata-au Clutha River.  Not listing the landscape values to be protected, or visual amenity values to be maintained would not provide enough certainty to achieve the policy direction in the PDP.

	<p>Further, the Mata-au Clutha River was identified as a PA and has been through a separate court process on the understanding that it would be scheduled and included in the PDP. Deciding not to notify this schedule would be inconsistent with the PA Landscape Schedules Variation or the objectives and policies in Chapter 3 relating to PAs.</p> <p>The approach would not provide more certainty in resource consent and plan change applications, and therefore would not assist with achieving the objectives of the proposal (or the other objectives and policies of the PDP).</p>
<p><b>Option 2: (Alternative Option)</b></p> <p>List the Mata-au Clutha River PA in the PDP, but do not list any RCLs into Schedule 21.23.</p>	<p>It is considered that not listing the non-PA RCL schedules would not achieve the objectives of the PDP.</p> <p>Not listing the visual amenity values to be maintained would not provide enough certainty to effectively implement the policy direction.</p> <p>Further, not listing the non-PA RCL schedules would result in an inconsistent approach to managing landscape across the Upper Clutha, with PA RCLs having landscape schedules and areas outside this not.</p> <p>Providing schedules for non-PA RCLs would provide more certainty in resource consent and plan change applications and better achieve the objectives of the PDP.</p>
<p><b>Option 3: (Preferred Option)</b></p> <p>List the Mata-au Clutha River Priority Area in Schedule 21.22 and 12 RCL Schedules in Schedule 21.23.</p>	<p>It is considered that listing both the Mata-au Clutha River PA, and the non-PA RCLs would help to achieve the objectives of the PDP and better</p>

	<p>identify the values to be protected for the or maintained and enhanced for the RCLs.</p> <p>This would also provide a more consistent approach to managing landscape in the Upper Clutha.</p>
--	--

## 11. Efficiency and Effectiveness

11.1. The following table considers the efficiency and effectiveness of the proposed provisions at achieving the purpose of the proposal and the objectives of the PDP. The proposed provisions include the landscape schedules for the Mata-au Clutha River PA), and the 12 additional RCLs (as set out in Appendix B2).

11.2. For ease of reference, the purpose of the proposal and the relevant objectives from the PDP are set out below:

**Purpose of the Proposal** *To implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 of the PDP for identified Priority Area Landscapes<sup>8</sup>.*

*To better achieve the landscape outcomes of the PDP relating to RCLs by identifying the visual amenity values to be maintained or enhanced and related landscape capacity in schedules.*

**Strategic Objective 3.2.5.1** *The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related capacity are identified.*

**Strategic Objective 3.2.5.7** *In Rural Character Landscapes of the Upper Clutha Basin:*

*a. Priority Areas of Rural Character Landscapes are identified; and*

<sup>8</sup> As noted above, the Mata-au Clutha River is a PA so these requirements are still relevant.

- b. Associated landscape character and visual amenity values and related landscape capacity are identified.*

Table 4: Assessment of the Costs, Benefits and Efficiency and Effectiveness of Option 1 (Status quo)

<b>Option 1: Do not list any additional landscape schedules in the PDP (Status quo)</b>			
<b>Costs</b>	<b>Benefits</b>	<b>Efficiency and Effectiveness</b>	<b>Risk of Acting/Not Acting</b>
<p><b>Environmental</b></p> <p>Not having landscape schedules may provide less certainty that the landscape outcomes in the PDP will be achieved. Further, by not identifying the values to be protected, or maintained or enhanced, there is a risk of cumulative effects on landscapes.</p>	<p><b>Environmental</b></p> <p>There are not considered to be any environmental benefits from this option.</p>	<p>This option is not considered to be effective or efficient.</p> <p>Not identifying the landscape values to be protected, or landscape character to be maintained or enhanced, would mean that resource consent applications and plan changes in the rural environment of the Upper Clutha would need to undertake a case-by-case assessment of values to be protected and visual amenity values to be maintained or enhanced.</p> <p>It is not considered that this approach is an efficient or effective way to achieve the objective of the proposal.</p>	<p>This option would not give effect to the Environment Court which identified the Mata-au Clutha River as a PA.</p> <p>Not identifying the values to be protected, or landscape character to be maintained or enhanced may result in less certainty that the landscape outcomes of the PDP would be achieved.</p> <p>The risk of this approach is that it would not give effect to the RPS-DV which requires identification of landscape capacity for ONL/Fs.</p> <p>The risk of not acting could result in an increased risk that Council may not meet its statutory obligations under the RMA with</p>
<p><b>Economic</b></p> <p>Not having landscape schedules may increase the cost to applicants for resource consent applications as applicants will need to identify the landscape values, landscape character, or visual amenity values of a landscape.</p>	<p><b>Economic</b></p> <p>There are not considered to be any economic benefits from this option.</p>		
<p><b>Social</b></p> <p>As drafted, the landscape schedules have been informed by public feedback</p>	<p><b>Social</b></p> <p>There are not considered to be any social benefits from this option.</p>		



<p>about the values people hold in the landscapes. Not including landscape schedules would provide no certainty that these values will be protected, or maintained or enhanced.</p>			<p>regard to landscapes (i.e., s6(b) and s7(c)).</p>
<p><b>Cultural</b></p> <p>Not identifying the mana whenua values in landscape schedules does not provide certainty with regard to what mana whenua values should be protected or maintained or enhanced.</p>	<p><b>Cultural</b></p> <p>There are not considered to be any cultural benefits from this option.</p>		

Table 5: Assessment of the Costs, Benefits and Efficiency and Effectiveness of Option 2 (Alternative option)

<b>Option 2: List the Mata-au Clutha River PA in the PDP, but do not list any RCLs into Schedule 21.23 (including amendment to SP 3.3.36 of Chapter 3 (Alternative option))</b>			
<b>Costs</b>	<b>Benefits</b>	<b>Efficiency and Effectiveness</b>	<b>Risk of Acting/Not Acting</b>
<p><b>Environmental</b></p> <p>There is a potential risk of cumulative effects on RCLs if their visual amenity values and character of these landscapes are not identified.</p>	<p><b>Environmental</b></p> <p>The values of the Mata-au Clutha River PA that need to be protected would be identified and this may help to better achieve the objectives of the PDP relating to Outstanding Natural Landscapes and Outstanding Natural Features.</p>	<p>This option would meet the requirements of the PDP relating to PAs. However, the approach would not provide enough certainty to achieve the policy direction for RCLs.</p> <p>Not identifying the visual amenity values and character to be maintained or enhanced would mean that resource consent applications or plan changes would need to undertake a case-by-case assessment to identify these values in the Rural Zone of the Upper Clutha.</p>	<p>This approach would meet the requirements of the PDP relating to PAs.</p> <p>The risk of this approach is that the policy direction in the PDP for RCLs would not be achieved.</p>
<p><b>Economic</b></p> <p>Not having landscape schedules for RCLs could increase the cost to applicants for resource consents or plan changes as a case-by-case assessment of the visual amenity values to be maintained or enhanced would need to be undertaken.</p>	<p><b>Economic</b></p> <p>Reduced cost to applicants for activities requiring resource consent within the Mata-au Clutha River PAs as the values that need to be protected would be identified.</p>	<p>It is not considered that this approach is an efficient or effective way to achieve the objective of the proposal.</p>	

<p><b>Social</b></p> <p>As drafted, the RCL schedules have been informed by public feedback about the values people hold in the landscapes. Not including landscape schedules would provide no certainty that these values will be protected or maintained or enhanced.</p>	<p><b>Social</b></p> <p>The Mata-au Clutha River Landscape Schedule has been informed by public feedback. There is a social benefit through identification of landscape values as this schedule would provide a high level of certainty that the values people associate with this landscape would be protected. However, these benefits would be limited to the Mata-au Clutha River only.</p>		
<p><b>Cultural</b></p> <p>Not identifying the mana whenua values within RCLs does not provide certainty with regard to what mana whenua values within RCLs need to be maintained or enhanced.</p>	<p><b>Cultural</b></p> <p>This option would identify the mana whenua values within the Mata-au Clutha River PA that need to be protected. This will assist Plan-users' understanding of the mana whenua values and provide greater certainty for the resource consent processes. However, these benefits would be limited to the Mata-au Clutha River PA only.</p>		

Table 6: Assessment of the Costs, Benefits and Efficiency and Effectiveness of Option 3 (Preferred Option)

<b>Option 3: List the Mata-Au Clutha River Priority Area in Schedule 21.22 and 12 RCL Schedules in Schedule 21.23, and amendment to SP 3.3.36 of Chapter 3(Preferred Option)</b>			
<b>Costs</b>	<b>Benefits</b>	<b>Efficiency and Effectiveness</b>	<b>Risk of Acting / Not acting</b>
<p><b>Environmental</b></p> <p>There are not considered to be any environmental costs of the implementation of the proposal.</p>	<p><b>Environmental</b></p> <p>The inclusion of the schedules in the PDP will provide greater certainty that landscape outcomes in the PDP will be achieved. By identifying landscape values of the PA it is clear what needs to be protected. By identifying landscape character and visual amenity values of RCLs, it is clear what needs to be maintained and/or enhanced. By identifying the landscape capacity for certain activities, better management of cumulative effects can be achieved.</p>	<p>Inclusion of the schedules within Chapter 21 is an effective way to achieve the purpose of the proposal and the objectives and policies of the PDP, as the purpose and objectives specifically direct the identification of “landscape character to be maintained, and visual amenity values to be maintained or enhanced and related landscape capacity”, albeit only through the scheduling of the PA RCLs (see SP 3.3.33(a). For non-PA RCL areas, the PDP requires identification in accordance with SP 3.3.45. This Variation is proposing to build from that requirement and include schedules for all RCL areas, to better achieve the Chapter 3 policy direction and provide clarity for plan users and landowners.</p>	<p>It is considered that the information about the landscape values and related capacity identified in the landscape schedules from this option is certain and sufficient and there is no need to assess the risk of acting or not acting for this option.</p>
<p><b>Economic</b></p> <p>There are not considered to be any economic costs of the implementation of the proposal. The proposal would not amend</p>	<p><b>Economic</b></p> <p>The certainty provided by the schedules will reduce the cost to applicants for resource consent, as applicants will not need to identify the</p>		

<p>any rules in the PDP, rather it seeks to provide more certainty for how the current rules are to be applied.</p>	<p>landscape values, landscape character or visual amenity values of the landscape.</p>	<p>The methodology used is that prescribed in the policies, and the schedules identify and describe each of the criteria required to be identified and described by the policies. A</p>	
<p><b>Social</b></p> <p>There are not considered to be any social costs from the implementation of the proposal.</p>	<p><b>Social</b></p> <p>The landscape schedules were informed by public feedback about the values people hold in the landscapes. There is a social benefit through the identification of landscape values, as the schedules provide certainty that the values people in the landscape will be protected, maintained or enhanced.</p>	<p>collaboration of two landscape architects, supported by other specialists and mana whenua, ensures that the identification of landscape values and related capacity occurred in a technically appropriate manner that followed best practice and the requirements of the PDP.</p> <p>Inclusion of the schedules in Chapter 21 is an efficient way to achieve the purpose of the proposal and the objectives of the PDP because the benefits of doing this outweigh the costs.</p> <p>Overall, the schedules, including the values and related capacity that they identify, are considered to be the <b>most appropriate</b> way to achieve the purpose of the variation and the objectives of the PDP.</p>	

<p><b>Cultural</b></p> <p>There are not considered to be any cultural costs from the implementation of the proposal.</p>	<p><b>Cultural</b></p> <p>There is a cultural benefit through the identification of mana whenua values within the schedules (associative attributes), providing certainty for what is to be protected, maintained or enhanced.</p>		
--	--	--	--

## 12. Most Appropriate Option

12.1. As noted above, the objectives of this Variation are:

- a. *To implement the requirements of Chapter 3 of the PDP that direct landscape schedules to be included in Chapter 21 (Rural Zone) for identified Priority Areas; and*
- b. *To better achieve the landscape outcomes of the PDP relating to RCLs by identifying the visual amenity values to be maintained or enhanced and related landscape capacity in schedules.*

12.2. In achieving the objectives of the Variation, three Options have been assessed. These are:

- a. Option 1 (Status quo): Do not list any additional landscape schedules in the PDP;
- b. Option 2 (Alternative): List the Mata-au Clutha River PA in Schedule 21.22, amend SP 3.3.36, but do not list any other RCLs in Schedule 21.23; and
- c. Option 3 (Preferred): List the Mata-au Clutha River PA in Schedule 21.22, amend SP 3.3.36, and the 12 additional schedules for the RCLs in Schedule 21.23.

12.3. The status quo option (Option 1) is not considered an appropriate option as it would not meet the objectives of the Variation. It would not implement the requirements of Chapter 3 relating to PAs and would not help to better achieve the PDP objectives relating to RCLs.

12.4. For Option 1, it is considered that the costs outweigh the benefits (for the reasons set out above), and that this is not an efficient or effective way to achieve the objectives of the Proposal.

12.5. The alternative option (Option 2) is also not considered to be an appropriate option. While it would meet the requirements of the PDP relating to PAs, limited to the Mata-au Clutha River PA, it would not provide added certainty to meet the objectives of the PDP relating to RCLs. Further, it is not considered that this option would not give effect to the RPS-DV which requires identification of landscape capacity for ONL/Fs.

12.6. For Option 2, it is considered that the costs outweigh the benefits (for the reasons set out above), and that this is not an efficient or effective way to achieve the objectives of the Proposal.

12.7. Overall, it is considered that **Option 3** is the most appropriate as it will implement the requirements for Chapter 3 (relating to PAs), and it will help to better achieve the objectives in the PDP relating to ONL/Fs and RCLs.

12.8. For Option 3, it is considered that the benefits outweigh the costs (for the reasons set out above), and that the Option is more efficient and effective than Option 2 and 3.

## 13. Conclusions

13.1. This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits, and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

13.2. Option 3 is considered the most appropriate way to achieve the purpose of the Act. Inclusion of additional landscape schedules in the PDP will better achieve the objectives of Chapter 3 Strategic Directions, and result in a more consistent approach to managing landscapes across the Upper Clutha.



## Appendix A – Proposed Policy Change

## Appendix B1 – Proposed Pre-amble 21.23

## Appendix B2 – Landscape Schedules

## Appendix C1 – Methodology Report

## Appendix C2 – Methodology Report Appendices

## Appendix D – Statutory Content

Appendix E – Clause 34 Feedback on Material Proposed to be Incorporated by Reference

## Appendix F – Maps (Incorporated by Reference)