

**PROPOSED PLAN VARIATION TO THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**SUMMARY OF EVIDENCE OF BRIDGET MARY GILBERT ON BEHALF OF THE**

**QUEENSTOWN LAKES DISTRICT COUNCIL**

1 As directed by paragraph 12.2 of Hearing Minute 1, I set out below a summary of the key points of my evidence. I have prepared a statement of evidence in chief dated 29 September 2023, and a statement of rebuttal evidence dated 24 November 2023. I did not receive any questions from submitters.

**Succinct summary of key points of my evidence**

2 My evidence is confined to the consideration of the landscape effects of the TPLM Variation in relation to Slope Hill Outstanding Natural Feature (**ONF**) and the Slope Hill ONF boundaries.

3 In my opinion, the TPLM Variation will not downgrade or adversely affect the landscape values of Slope Hill ONF for the following reasons:

(a) The physical extent of the TPLM Variation area avoids encroaching into the Slope Hill ONF.

(b) The proposed policies that relate to Slope Hill ONF (i.e. policy 49.2.7.9<sup>1</sup>, policy 27.3.24.4<sup>2</sup> and 49.5.41.4(c)<sup>3</sup>).

4 I understand the Council's position is that changes to the Slope Hill ONF boundary are beyond the scope of the TPLM Variation. However, irrespective of the Panel's finding on scope, I note that the Slope Hill ONF mapping has been confirmed by the Environment Court in the PDP Topic 2 decisions. I am of the opinion that the Slope Hill ONF boundary along the northern side of the TPLM Variation Area is appropriately located from a landscape perspective.

**Latest position on the matters remaining in dispute**

*Moving the UGB into Slope Hill ONF*

5 The main outstanding issue concerns Glenpanel Development Limited's submission seeking that the Urban Growth Boundary (**UGB**) is extended into Slope Hill ONF.

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<sup>1</sup> Which requires development north of SH6 to be of a high-quality building and site design, that promotes and supports neighbourhood amenity values, reflects the highly visible location close to the state highway, and that is appropriate in the setting adjacent to the outstanding natural feature of Slope Hill.

<sup>2</sup> Which requires subdivision design to support visual links north to open spaces at the base of Slope Hill when viewed from the intersections on SH6 shown on the TPLM Structure Plan, and views to The Remarkables from SH6.

<sup>3</sup> Which includes the requirement to protect public views to Slope Hill and the Remarkables Range as a matter of discretion where building height standards are infringed.

6 The Slope Hill ONF Joint Witness Statement (**JWS**) records the landscape experts' agreement that we "do not consider that water tanks in their own right, read as urban development".<sup>4</sup> This is reiterated at paragraph 25 of Mr Compton-Moen's evidence.

7 Accordingly, and in reliance on Mr Brown's planning evaluation in his rebuttal evidence on behalf of the Council, I do not consider that it is necessary to realign the UGB to incorporate the (potential) location of the water tanks.

8 I have also re-read *Bridesdale Farm Developments Limited*, in which the Court stated that UGBs are a tool for managing growth within distinct and defensible urban edges.<sup>5</sup> Therefore, I remain of the opinion expressed in the Slope Hill ONF JWS that moving the UGB to overlap the ONF does not align with the intentions of PDP Objective 4.2.1.

#### *Rezoning rural land within Slope Hill ONF to urban zoning*

9 With respect to submissions seeking to rezone Rural Zone land within Slope Hill ONF to an urban zoning (including residential), I understand that the key landscape related policy test in the PDP is the protection of landscape values<sup>6</sup>.

10 I do not support enabling urban development northwards across the lower (or higher) southern slopes of Slope Hill ONF.

11 In my opinion, urban development across the lower southern slopes of the ONF would detract from (or not protect), the impression of Slope Hill ONF as a seemingly undeveloped distinctive and highly legible, roche moutonnée landform feature, in which built development is very limited and is subservient to the natural landscape elements, patterns and processes. More specifically, I consider that urban development across the lower southern slopes would not protect the identified landscape values described in the rebuttal version of the Slope Hill Priority Area ONF Schedule of Landscape Values (refer my Rebuttal Evidence, Appendix A: paragraphs [1], [2], [16], [18], [19], [22], [23], [24], [25], [26], [29], [30], [31], [33]).

**Dated:** 5 December 2023

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<sup>4</sup> Slope Hill ONF JWS, Attachment A at page 3 paragraph [h].

<sup>5</sup> *Bridesdale Farm Developments Limited v Queenstown Lakes District Council* [2021] NZEnvC 189: [83](d).

<sup>6</sup> For example, 3.3.30, 6.3.3.1(a), 21.2.1(a), 21.21.2.6.