

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Hearing Stream 13
– Queenstown Mapping
Annotations and
Rezoning Requests

**REPLY OF MARION READ
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

LANDSCAPE PLANNER

6 October 2017

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1. INTRODUCTION

1.1 My name is Marion Read. I prepared a statement of evidence in chief and rebuttal on landscape issues, for the Queenstown Mapping Hearing Stream 13, and a summary of evidence. My qualifications and experience are listed in my evidence in chief dated 24 May 2017.

1.2 The purpose of this reply evidence is to specifically respond to matters raised by the Panel and submitters during the course of the hearing. In particular, my reply evidence relates to the following submissions:

- (a) Gertrude's Saddlery (494) and Larchmont Developments (527);
- (b) Gibbston Valley Station (827);
- (c) Hensman et al (361); and
- (d) Darryl Simpson and Louise Cooper (495);
- (e) Skyline Enterprises (574);
- (f) F S Mee Developments Co Ltd (425 and 429);
- (g) Middleton Family Trust (338);
- (h) Spence Farms (698);
- (i) 'Frankton North' (751/1270; 177/1029; 847; 717; 399);
- (j) Jardine Family and Remarkables Station (715);
- (k) Mount Christina (674);
- (l) Loch Linnhe Station (447); and
- (m) Grant (455).

2. GERTRUDE'S SADDLERY (494) AND LARCHMONT DEVELOPMENTS (527)

2.1 I understand there was some question at the hearing regarding the contribution of the trees on the subject site to its classification as a part of the Outstanding Natural Landscape (**ONL**). These trees are wilding species that have spread from adjacent plantings. While they contribute some aesthetic value, particularly in autumn (they are predominantly larches with orange/red autumn colours) the knoll without them covered in pasture or regenerating indigenous vegetation would in my view remain justifiably part of the ONL.

2.2 I reiterate that in my opinion the entire landscape in which the Arthurs Point Low Density Residential (**LDR**) and Rural Visitor Zone (**RVZ**) are embedded in is ONL. The natural character of the landscape varies from very high, mostly in the higher reaches of the surrounding mountains and on the steeper slopes adjacent to the river, to moderate in the vicinity of the settlement areas and on the face of Mount Dewar. This diminishment in natural character is principally the result of past land uses including farming and forestry resulting in the spread of wilding species and interventions in the landscape such as tracks and other earthworks. It has other important qualities which warrant its inclusion as an ONL and these include its aesthetic qualities, and its historic associations. It is, in my opinion, indisputably a part of the sublime landscape of the surrounding mountains.

3. GIBBSTON VALLEY STATION (827)

Comments on Artist's impression

3.1 I have been asked to comment on the 'artist's impressions' presented at the hearing by Mr Milne for the submitter. I note that these are artist's impressions and not visual simulations.

3.2 The vines in the artist's impressions are by far the most verdant grape vines I have ever seen. Grape vines are devoid of leaves for close to six months of the year and generally have far less foliage than suggested in the impressions. Consequently, the degree of visibility of buildings suggested in Artist's Impression 5 is considerably understated in my opinion.

3.3 I noted in my rebuttal evidence that I considered the construction of stone walls along the road boundaries was undesirable as one of the characteristics (a valuable one in my opinion) of the Gibbston Valley landscape is the openness of the road margins. This openness contributes an informal quality to the landscape character and allows for unimpeded views across the vineyards and pasture to the

surrounding mountains. Together these factors contribute significantly to the valley's charm.

- 3.4** In Mr Milne's artist's impressions these walls have been extended along the valley, and hedges are now included. Together these would further inhibit views from the highway making the experience of travelling through the landscape more akin to being within a corridor. I consider that outcome would significantly alter the character of the valley landscape and in my opinion this would be a detrimental change.

Kawarau River Corridor

- 3.5** In Paragraph 8.41 of my rebuttal evidence I expressed concerns regarding the expansion of the proposed subzone into the ODP Rural General (Rural) zone adjacent to the river. The avoidance of effects on the users (rafters and kayakers predominantly) of the river was given significant weight in the original consent hearing. This resulted in some of the proposed development being pulled back from the river corridor so as to avoid such an intrusion. My concern regarding the submission was similarly to avoid these effects. The modified proposal presented to the hearing withdraws the subzone from the Rural zoned areas and consequently my concerns have been fully addressed.

4. HENSEMAN ET AL (361)

- 4.1** I have read paragraphs 56 to 58 of Ms McDonald's legal submissions in addition to the notes written by Mr C Hansen and appended to those submissions.
- 4.2** Contrary to Ms McDonald's submission, the description of Mr Hansen's method of determining the height limits within the proposed zone is exactly as I understood the height limit determination to work.
- 4.3** I accept that this method would ensure that buildings were not prominent in close views of the site. My concerns are not with these views of the site (from the 2.5km of SH6 that the modelling was done

from) but from the more distant and oblique views which have not been modelled. I stated this in paragraphs 8.4 and 8.5 of my rebuttal evidence and I remain of the same opinion. I also note that Ms Snodgrass and I are in agreement about the site and development within it being visible from a wide visual catchment.

5. DARRYL SAMPSON AND LOUISE COOPER (495)

5.1 I accept that Mr Espie's yellow line (see Appendix 1 of Mr Espie's evidence in chief) showing the edge of the terrace escarpment is more accurate with regard to the subject site than my own, which is identified as 'approximate'.

5.2 I do not support the rezoning of the entire site and the use of a Building Restriction Area (**BRA**) over the land on the terrace escarpment. The rezoning would effectively result in the uplifting of the ONL classification from this area, which is prominent and located within the corridor of the Shotover River. I understand that development within the proposed BRA would become non-complying and that this would mean that any such proposals would be considered in relation to the objectives and policies of the RVZ and, secondarily, the Landscape Chapter. I consider, however, that the application of the landscape assessment matters for development within an ONL are a better and more appropriate means of managing this sensitive landscape area. I therefore consider that the land within the site but outside of the operative RVZ should remain zoned Rural.

6. SKYLINE ENTERPRISES (574)

Extent of ONL

6.1 There was a question from the Panel as to whether the gondola corridor, and possibly the development area around the Skyline restaurant, could be excluded from the ONL as they do not demonstrate the qualities of the broader ONL.

6.2 The landscape in which these developments occur extends, at a minimum, from Arthurs Point to the unnamed promontory to the west

of Sunshine Bay and from the edge of the township to the skyline. This is the landscape, part of the even broader landscape of the Richardson Mountains, which is assessed to be an ONL.

- 6.3** It is well established that an ONL does not need to be of consistent character or quality.
- 6.4** While the infrastructure within the gondola corridor and the buildings and structures on the mountainside detract from the character and quality of the broader landscape, in my opinion the degree to which this is the case is small given the scale of the overall landscape. Certainly it is too small to result in the landscape of the Bowen Peak / Ben Lomond landscape losing its outstanding status. Also, arguably, the cleared area within the gondola corridor has a higher natural character than the conifer covered slopes to either side balancing, to a degree, the presence of the gondola infrastructure.
- 6.5** The area that encompasses the gondola corridor and the skyline developments are not large enough to be considered to be a landscape in its own right. The NZILA defines 'landscape' as "the cumulative expression of natural and cultural features, patterns and processes in a geographical area, including human perceptions and associations".¹ The area in contention cannot be described as a 'geographic area' but is more an area of development within a geographic area. A more prosaic definition of 'landscape' from the Oxford Compact English Dictionary is the 'natural or imaginary scenery, as seen in a broad view'. I think key in this definition is the 'broad view'.
- 6.6** Consequently, I do not consider that the gondola corridor and Skyline development area should be excluded from the ONL.

Site coverage rule

- 6.7** I stated in my rebuttal evidence, at paragraph 4.7, that I considered that the submitter's proposed site coverage limit of 35% was too

¹ New Zealand Institute of Landscape Architects, Best Practice Guide: Landscape Assessment and Sustainable Management, 2010 at page 5.

great, and that 15% would be more appropriate. I noted that this would allow for an approximate doubling of the size of the existing buildings. In making this recommendation I was considering the buildings, in particular but not limited to, the restaurant and gondola terminal building. That is, I was considering buildings in the common sense rather than the legal sense of the term. I was not including structures such as the chairlift towers in my consideration and understand this is consistent with the definition of building coverage in the ODP.

6.8 I therefore clarify that my support of a site coverage of 15% is more correctly a building coverage, and should be limited to buildings as defined in the PDP. I do not, for example, consider that the luge track should be included in the calculation of the coverage.

7. F S MEE DEVELOPMENTS CO LTD (425 and 429)

7.1 I have seen the modified proposal as presented at the hearing by the submitter. I remain of the opinion that the only justifiable extensions to the Low Density Residential (**LDR**) zoning possible in this area are those I have identified in my evidence in chief. I reiterate that these areas of extension are justified, in my opinion, purely to make the boundaries of the zone more coherent from a landscape perspective.

8. MIDDLETON FAMILY TRUST (338)

8.1 Ms K Banks has asked me to comment on the proposal to rezone the lower terraces (below the ONL boundary and above the proposed Rural Residential zone) of the Middleton property to LDR. This area is within that subject to the Wakatipu Basin Land Use Planning Study (**WBLUPS**). It is a part of their Character Area 4. The authors of the WBLUPS concluded that the potential for development was low at the western end in the vicinity of the terraces and moderate to high through the central (around Hansen Road) and eastern (adjacent to the Waterston subdivision) portions. I agree with regard to this part of the western end.

8.2 LDR development on these terraces, the higher of which is actually quite elevated at approximately 400masl, would be prominent in views from within the Wakatipu Basin. The images within my primary evidence that relate to this submission actually include these areas and indicate this clearly.

9. SPENCE FARMS LIMITED (698)

9.1 The notified ONL boundary in the vicinity of the Spence farm property is not correctly located. Currently, as notified on the Planning Maps, the ONL line includes the cemetery and follows an incoherent route through the submitter's site. I consider that it should follow the toe of the slope as this is the location of a distinct change in geology, topography, and vegetation. All of the land identified to the north of the line is more consistent with the land further to its north than the land to its south.

9.2 The reason the ONL boundary was extended around the cemetery (prior to notification) was because the cemetery is an historic feature with high cultural and high aesthetic value warranting its protection, in my opinion, under s 6(f) of the RMA. I fully accept that this may not provide adequate grounds for including it within the ONL and suggest that the boundary should be amended accordingly. I attach as **Appendix 1** to this evidence a corrected map of this area.

9.3 For clarity, my corrected ONL line as shown in **Appendix 1** does include a small area of LSCZ to the north of the cemetery.

10. FRANKTON NORTH

Frankton ONL – general

10.1 I first undertook the assessment of the appropriate location of the ONL boundaries of the District in 2011, and then revised (with peer review input from Mr B Espie) and completed this review in 2014 for the purposes of the District Plan review. My input into the notified ONL line predates the proposed Medium Density Residential (**MDR**)

development in the vicinity as notified, and also the location of the notified Urban Growth Boundary.

- 10.2** The PDP was also notified in advance of the proposed Housing Infrastructure Fund (**HIF**) road alignment (as illustrated in Exhibit 13.1A presented by Mr Goldsmith). All of these features, which are now under consideration, appear to have been identified / designed without consideration of the ONL and with little if any discussion of landscape issues being entered into. My understanding is that the landscape classification needs to occur first, and then consideration of the future development of land can be made. I note that nothing in either the operative or proposed District Plans precludes development occurring within the ONLs, simply restricting it to that which is not inappropriate.
- 10.3** While the proposed HIF road alignment in Exhibit 13.1A makes use of land that is not available for residential development (as it is under the power lines and within the National Grid Corridor (**NGC**)), which is efficient, it does not in my opinion provide optimum access to the most easily developable land. I understand that the modified structure plan now being proposed by Ms Banks is consistent with this position.
- 10.4** From a landscape perspective the 50 metre build restriction along SH 6 has little benefit, and from adjacent to the FII Holdings site east has no benefit at all. I understand that Ms Banks is now proposing that this be reduced to 20m. I consider this to be positive but consider that it could be reduced further and still provide pedestrian and cycle access plus the potential to provide some screen planting for the amenity of residents to the north.

Mr Goldsmith's submissions

- 10.5** I understand that Mr Goldsmith is proposing a 'compromise' ONL boundary, basically following the northern boundaries of the lots adjacent to SH6 and bisecting the more westerly properties before crossing Hansen Road. This is an entirely arbitrary location that does not relate to any landscape features.

10.6 Mr Goldsmith has appended as Appendix D a map of the vicinity showing draft ONL boundaries. This is not the map appended to C180/99 and I do not know its origin or veracity. I simply note that the location of many of the lines as established in a series of Court Cases and appended to the Operative District Plan in Appendix 8A differ to those on this map as a result of detailed assessments.

James Bentley

10.7 Mr Bentley presented at the hearing and filed a summary of evidence dated 15 August 2017 on behalf of a number of submitters.²

10.8 On 29 August 2017 I walked the water race along the hillside through the Hansen land to the vicinity of the western boundary of Quail Rise with Ms Banks and Mrs Hansen. Height poles indicating the location of the, now consented (RM1501046), building platforms were still in place. On the basis of my observations undertaken on that excursion I remain of the opinion that the appropriate location of the ONL boundary is at the foot of the slope as notified.

10.9 Mr Bentley states in his summary that using a purely geomorphological approach to mapping an ONL boundary is incorrect. I agree with this position. He continues to intimate in his summary that this is the approach that I have taken. This is not correct. I have considered other natural and cultural aspects of the landscape and consider that those to the north and south of the notified ONL boundary are significantly different and sufficiently different to support the notified ONL boundary location. Below is a table showing the distribution of landscape and cultural features across three identified areas within the area in question: the land above the water race, the areas of ONL not in dispute; that between the water race (Mr Bentley's ONL boundary) and the toe of the slope (the notified ONL boundary); and the land between the notified ONL boundary and SH6.

² Hansen Family Partnership (751), FII Holdings (847), Peter and Margaret Arnott, Fernlea Trust (399), The Jandel Trust (717) and Universal Developments (177).

	Roads	Indigenous vegetation	Cultural plantings	Dwellings	Other structures	Other	Geological feature	Land use
Above the water race	Hansen Road Reservoir access road.	Some scrub on margins of Lake Johnson. Scrub on highest and steepest slopes of Ferry Hill, A3B2, and K No2. I anticipate the presence of tussock on these areas.	Pasture. Poplar shelter belts Conifer shelter belts Scattered conifers. Domestic gardens.	Four dwellings (Goldsmith, Hansen, Hansen and Sperrer)	QLDC reservoir. Farm buildings within residential curtilages.		Part of Caples Terrain roche moutonnee complex	Predominantly agricultural
Between the water race and the toe of the slope	Hansen Road Trench Hill Road	Matagouri extensive in gullies. Wetland areas with <i>Carex secta</i> , sedges and areas of tussock.	Pasture. Wilding hawthorn. Some willows. Very top end of one hawthorn hedge	Four dwelling sites (since RM151056). No extant buildings	Electricity substation and power lines.	Unconsented earthworks (Quail Rise zone)	Part of Caples Terrain roche moutonnee complex	Predominantly agricultural
The flats	Hansen Road	None	Pasture. Hawthorn hedges Conifer shelter belts. Dense garden planting (Arnotts) Extensive indigenous screen planting (FI1)	Six dwellings	Engineering works, farm buildings associated with dwelling, Delta Utilities facilities.	Three contractors yards (Dart Engineering; Delta, FI1), Electricity substation	Part of Shotover River outwash plain.	Some agriculture. Some residential use. Some industrial use.

10.10 Mr Bentley notes in his summary that the ONL boundary does not follow any natural geomorphological boundary in the vicinity of the Quail Rise development. This is correct and is a result of the development areas of the zone predating the landscape classification. A similar situation exists around much of Queenstown township, particularly on the faces of Queenstown Hill. Having incoherent ONL boundaries in some locations is not a reason, in my opinion, to create more incoherent boundaries when the opportunity exists to locate them appropriately where they will be defensible in the future.

10.11 Mr Bentley states that I have failed to consider the consented but as yet unbuilt development located between the water race and the notified ONL boundary. I discussed this consent at paragraphs 5.6 to 5.9 of my evidence in chief, mainly in regard to the flaws I considered

existed in Mr Bentley's landscape classification. The commissioners in their consent decision (RM151046 as referred to in my evidence in chief at paragraphs 5.6 and 5.13 and my rebuttal at paragraph 5.12) applied the ONL(WB) assessment criteria to their determination of the appropriateness of the subdivision and establishment of these four building platforms. They concluded that the application met those assessment matters.

10.12 Consequently, I do not think it can now be argued, as Mr Bentley attempts to, that the area in which they are located cannot now be part of the ONL as a consequence of this approval. Further, Mr Bentley completely fails to acknowledge the presence of four dwellings within the area he himself identifies as ONL. These are:

- (a) The Sperrer property, Lot 6 DP 18845;
- (b) The Goldsmith / Gillies property, Lot 1 DP 24234 Block I Shotover SD;
- (c) The Hansen property (1), Part Lot 2 DP 24234; and
- (d) The Hansen property (2), Lot1 DP 300016.

10.13 He also fails to acknowledge other aspects of domestication within the ONL to the north of his proposed boundary, including poplar and conifer shelterbelts.

10.14 It has been argued, both in RM151046 and in this hearing stream, that the ONL boundary should be moved because it is inappropriate to have it running through an area of MDR zoning. As noted above, the operative and proposed District Plans (and case law authority) require the determination of landscape classification prior to the consideration of development proposals. Consequently the actual position is, arguably, that it was inappropriate to propose the zoning land within an ONL MDR and not *vice versa* .

10.15 Mr Goldsmith raised the *Waterson* case (C169/2000) in his legal submissions dated 15th August 2017 and appended the decision as attachment B to those submission. In that decision the EC determined the location of the ONL boundary on the northern side of Ferry Hill and noted the following *“there are four circumstances that*

suggest that the topographical lines should give way to a recognition of the realities of the situation".³ These are:

- (a) the presence of development (houses) within the ONL which, they note, are not precluded by the ONL status but are 'a factor to consider';
- (b) the degree of naturalness (in this case pasture and exotic trees);
- (c) the adjoining development; and
- (d) the need for a practical boundary.

10.16 First, I note that 'topographical lines' are the preeminent form from which various circumstances mean diversion may be appropriate.

10.17 Second, as noted in the table above, I have considered the level of development that exists within the ONL, both extant and consented. As mentioned above, Mr Bentley has never acknowledged the presence of the four extant dwellings within the area above the water race.

10.18 Regarding the degree of naturalness, it is my observation that the area below the water race but above the flats (the area in contention) has slightly higher natural character than the area of the saddle between the water race and Lake Johnson. Both areas have lower natural character than the steeper slopes and more elevated land on Ferry Hill, A3B2 and K Number 2. It has long been established that 'naturalness' can have both a wide interpretation not always referring directly to the degree of indigeneity, and that it is not a requirement in the definition of an ONL (or other landscape classification) that its character or quality be exactly consistent. Mr Bentley ignores the presence of poplar and conifer shelter belts within the saddle area, and fails to note that they are not present on the lower slopes, nor does he acknowledge the indigenous vegetation present on the lower slopes.

10.19 The principle of considering adjacent development appears to relate to ensuring that like is treated as like. That is, in the *Waterson* case

3 C169/2000, at para 10.

subdivision had already been consented on similar land to that to which the case applied. In the case of the subject area, the ONL boundary as notified would separate two distinctly different areas, the northern part of the Frankton Flats from the massif of Ferry Hill and K Number 2. It should be noted that the Quail Rise subdivision is located within a third area of predominantly glacial deposits. This principle is relevant to the location of the ONL at the most eastern end of the flats, and I will discuss this below.

10.20 In this case the existing adjacent development has no significance over the majority of the area in question. With regard to the anticipated adjacent development being promoted in the PDP I note that the urban form of Queenstown abuts the ONL along a defensible boundary along the foot of Bowen Peak. I do not believe this detracts in any way from the quality of the ONL in that location and do not consider that it would do so in this either.

10.21 The issue of practicality does not arise over most of the area in contention as it is possible to determine a clearly defined boundary. It may have relevance at the most eastern end where the obvious ONL boundary must join with the arbitrary (in landscape terms) boundary within the Quail Rise zone. I will discuss this further below.

10.22 It is the case that at the eastern end of the flats the appropriate location of the boundary becomes much less easily determined (on the eastern part of the Hill site and the Universal Developments site). This is because the natural boundary has become more obscured by land uses, and consequently the quality of the ONL immediately upslope has been degraded somewhat. In addition the need to make an obvious boundary (the notified boundary to the west) join up with a boundary which has been located around a pre-existing development (Quail Rise) means that the line will not relate to landforms at some point in this connection. In this area I consider that the principles of considering adjacent development and the practicality of the location become relevant.

10.23 I remain of the opinion that the location of the notified ONL boundary is the best fit as it follows the transition in slope as closely as possible

for as long as possible. The effects on the wider ONL of a more pragmatic location for the ONL boundary in this vicinity, along lot boundaries, for example, would not be significant. I have identified the area in which I consider this approach to be appropriate on the map attached as **Appendix 2** to this evidence.

Assessment of HIF Road alignment

- 10.24** It is my understanding that the HIF road currently has no official status beyond applications by the Council, to the Government, for funding. I have, however, been asked to undertake an assessment of the proposed location as illustrated in Exhibit 13.1A.
- 10.25** The proposed route of the HIF extends from the roundabout on SH6 at the intersection between the highway and Hawthorne Drive at right angles to the highway. It arcs to the north climbing the slope until the NGC is reached. It then follows the NGC until that corridor heads to the north east close to Quail Rise. In total the proposed HIF is approximately 850m long.
- 10.26** The lower part of the route runs across land that is subject to rezoning. While the final zoning is yet to be determined I consider it inevitable that this area will be urbanised in some form, and for this reason I will not comment on this first portion of the HIF location save to say that it will provide a view shaft through future development to the ONL to its north. I consider this to be positive.
- 10.27** The proposed road is to enter the ONL on the Hansen property and follows the NGC parallel to the hillslope. Consequently, it leaves the NGC on Lot 2 DP 497316 before turning to the north to meet up with Ferry Hill Drive and Trench Hill Road.
- 10.28** As a consequence of the proposed route, approximately 600m of the road would be located within the ONL with approximately 300m being located just north of the notified boundary. The Aurum plan (Appendix Y of Mr Goldsmith's legal submissions dated 11 August 2017) identifies significant cut and fill batters approximately 7m in height and 12m in extent would be necessary to construct the road

within the Hansen and FII properties. I consider it likely that similar batters would likely be required further to the east on the Universal Developments' site.

- 10.29** In my opinion the proposed road and its required earthworks would have an adverse effect on the quality and character of the ONL in its immediate vicinity. I consider that the extent of this adverse effect would be moderate and on the wider ONL would be moderately insignificant. I am of the opinion that the location of this road should be altered to run along the foot of the slope to intersect with Ferry Hill Drive near its end. This is in part so as to avoid adverse landscape effects but in the main simply because it would provide better access to the site in this location. I understand that the revised structure plan, which Ms Banks is including in her reply evidence, reflects a similar opinion.
- 10.30** It may be helpful for the Panel to consider the wider picture when considering this discussion of the location of the ONL boundary along north Frankton. There have been numerous submissions requesting, at least effectively, that the notified ONL boundary around the fringes of Queenstown be moved to allow for extensions of various urban zones, usually so that they extend to lot boundaries. Those that I have supported (which is most of them) I have been able to do so because the boundary which has become established between the various township zones and the ONL has no coherence in a landscape sense. That is, the only feature which distinguishes much of the land around the margins of the town from that within the notified boundaries is that development has been facilitated on one side of the line and not the other.
- 10.31** The ONL boundaries as amended by these various submissions will likely be open to similar challenges at a future date. These would have to be met in a similar manner, and this could result in development creep.
- 10.32** In the vicinity of North Frankton, a similar situation would arise should the ONL boundary as notified be discounted. There is nothing in a landscape sense to distinguish the land to the north of the northern

boundary of the area proposed as MDR in the PDP (Mr Goldsmith's compromise boundary) from the area between it and the notified ONL boundary except the steepness of the slope. The land to the north of these lots has much more gentle topography and is consequently much more readily developable.

- 10.33** If Mr Bentley's ONL line were adopted the land between the MDR boundary as notified and the water race would be classified as Rural Landscape Classification. In my opinion this land would be immediately open to rural living type development pressure. Once this intervening land were so developed there would be no cogent landscape reason left to defend the location of the ONL boundary along the water race which could allow for similar development to extend up into the saddle. I consider that development in this area may, in the long term, be an inevitable consequence of the pressure of the expansion and development of Queenstown township. I consider that the surrender of this important part of the ONL which contains the township and provides much of its amenity and appeal, should be made as a conscious and considered decision, most desirably with a master planning approach, rather than in a piecemeal manner which could result in both the loss of an important landscape and the inefficient use of the land.

11. JARDINE FAMILY AND REMARKABLES STATION (715)

- 11.1** Proposed Activity Areas A, B, and C are located in an area considered to be Visual Amenity Landscape, in the terms of the ODP, and Rural Landscape Classification in the terms of the PDP. These classifications are intended to give effect to s7(c) of the RMA.
- 11.2** Lake Wakatipu and much of the landscape surrounding it, including Jacks Point hill and the lake margins, are considered to be ONL in the terms of the PDP. (Under the ODP they are in part ONL Wakatipu Basin and in part ONL District Wide). These classifications are intended to give effect to s6(b).
- 11.3** It is possible for development within one landscape classification (usually the s7(c) landscapes) to have an adverse effect on the

appreciation of other landscapes. This is the case of proposed Activity Areas A, B and C. It is my evidence that the proposed design of these areas would obscure the lake surface from valued public views, namely from parts of the State Highway. I remain of this opinion, noting that Mr Espie's images indicate the height of the proposed mounding and do not indicate the additional height of the vegetation it is proposed to plant on these mounds, which could add up to a further 15m (eventually) to this.

- 11.4** While it is the case that the lake is highly visible from the highway from further south, the reason the views over the site are important is the contribution of the open pastoral foreground to the overall view. That is, the aesthetic coherence and pleasantness of the s7(c) landscape contributes significantly, in my opinion, to the quality of the views of the ONL of the lake and mountains. I do consider that I overstated the importance of this view over the more northern part of the subject site, however, but remain of the opinion that the proposed development would have an adverse effect on its quality.
- 11.5** The proposal puts considerable emphasis on hiding development from view from the State Highway. It does so by the creation of a very large hole in which the residential subdivision is to be developed. It is to be surrounded by a bund with, effectively, a tall hedge on top of it. While development might not be visible from the State Highway this design would also not promote an attractive and desirable living environment.
- 11.6** It is my opinion that Activity Areas A, B and C should not be advanced at this time as proposed by the submitter. I fully anticipate that the area in question will become urbanised in the future, connecting Lakeside Estate with Jacks Point. I believe that if the character and quality of the landscape were given adequate consideration an appropriate design response would be possible which would provide residents of the future subdivision with a pleasant living environment including a relationship with the lake (views, pedestrian and road connections, ecological corridors) and which would add to, or at least not detract from, the views from the State Highway.

12. MOUNT CHRISTINA (674)

- 12.1** I have examined the Darby Partners plan dated 31/8/17 and titled 'District Plan Review Map 9: Mt Christina, Job No. MC_9, Drawing Number DP-002' showing the topography of the site in relation to the proposed zone boundary. I am satisfied that a 20m setback from the zone boundaries would have a similar effect to a 20m setback from the escarpment edges.
- 12.2** Mr Ferguson states, at paragraph 13(c) of his evidence summary that, "*The evidence for the Council does not challenge the location and shape of the zone as being appropriate for the qualities of the landscape.*" In fact, at paragraph 15.4 of my Evidence in Chief I commented that, "It is my opinion that the development of the zone will have an adverse effect on the character and the quality of the landscape in the vicinity." I noted that this was already anticipated. I consequently recommended a reconfiguration of the zone, which I considered would minimise these adverse effects.
- 12.3** I have examined Attachments AA and BB appended to Mr Skelton's summary evidence presented to the Panel. Given my concerns about the effects of the zoning as noted above, I remain of the opinion that the limit on the number of lots should be 26.

13. LOCH LINNHE (447)

- 13.1** I have read the summary evidence of Mr B Espie and Mr C Vivian relating to the submission #447 for Loch Linnhe Station. I note that the northern area has been further reduced. This has had the effect of excluding the areas of significant indigenous vegetation and the rock outcrops along the lake margin. I consider this is positive. I note that a significant rock outcrop remains within the proposed development area and consider that it too should be excluded.
- 13.2** With regard to Mr Vivian's evidence, I note that he claims that the retention of the existing Rural Zone over these parts of the site is equivalent to 'imposing a landscape reserve over stations such as

Loch Linnhe'. In my view this is simply wrong. The provisions of the PDP do not prohibit development within any of the ONLs of the District but require, simply, that development is not inappropriate as is a requirement of s 6(b) of the Act. All of the types of development that the proposed zone change aims to facilitate – farm buildings, residential development, visitor accommodation – are potentially appropriate providing they are suitably located and designed.

14. GRANT (455)

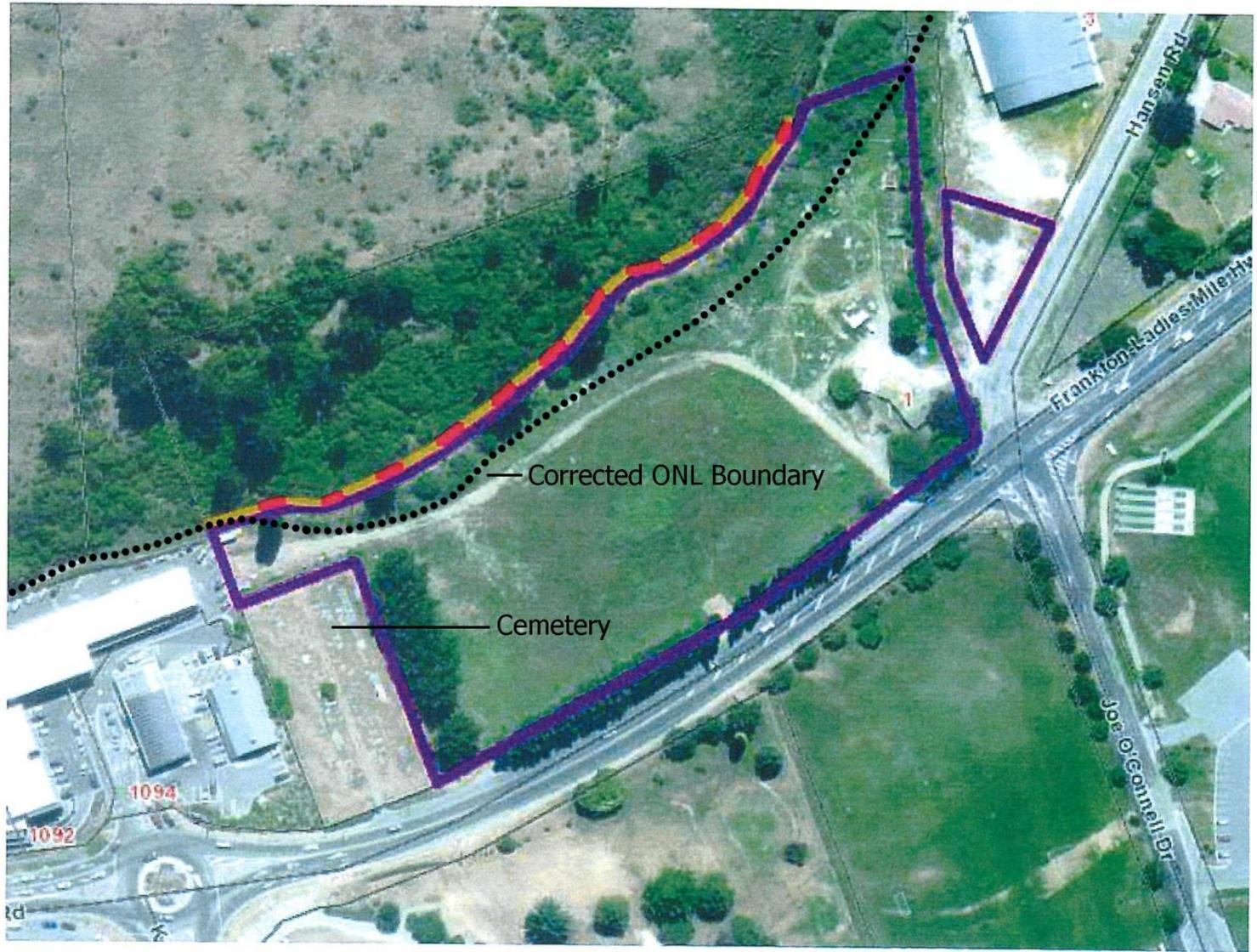
14.1 It has come to my attention that an error has been made in the location of the ONL boundary on the subject site at the southern end of Hansen Road. The ONL boundary loops upslope adjacent to the road, whereas it should follow the toe of the slope. This location is illustrated in **Appendix 3** to this evidence.

A handwritten signature in blue ink that reads "Marion Read." The signature is written in a cursive style with a period at the end.

Marion Read

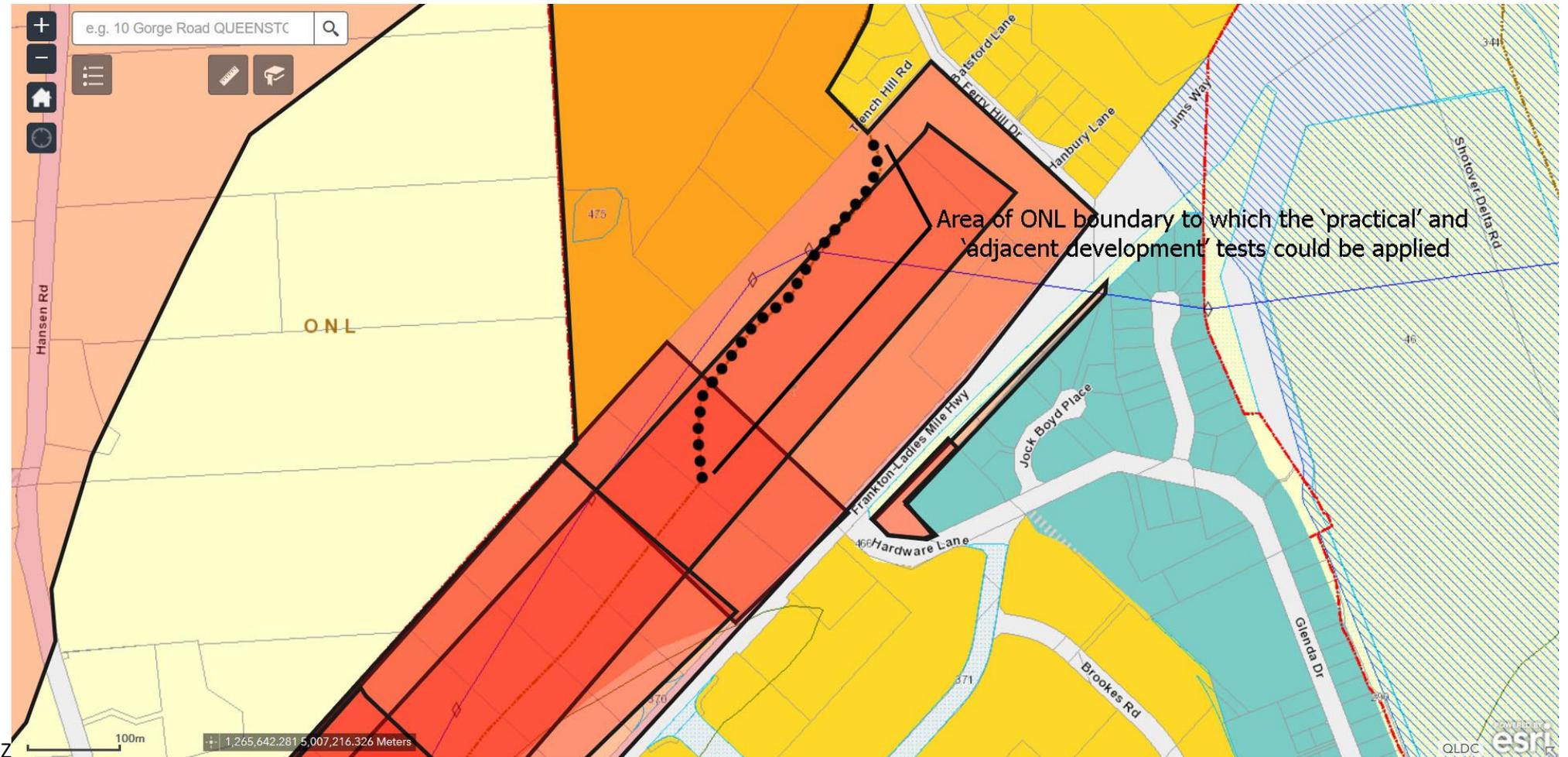
6 October 2017

APPENDIX 1 – CORRECTED ONL LINE MAP FOR SPENCE FARMS LIMITED (698)



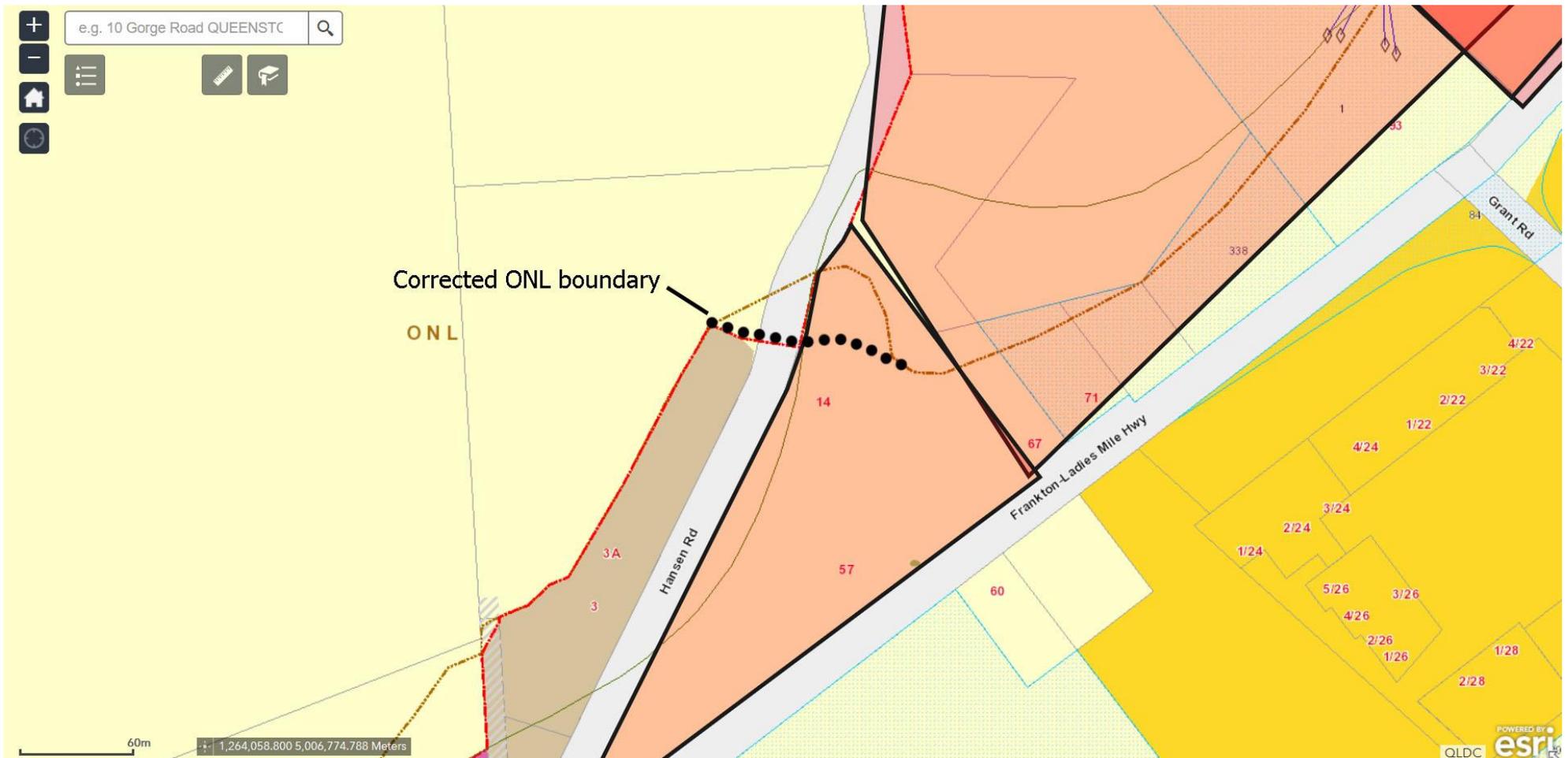
Appendix 1: M Read, Landscape RoR Evidence
Mr Edmonds - Planning Map Snapshot

**APPENDIX 2 – 'PRACTICAL' AND 'ADJACENT DEVELOPMENT' FRANKTON
NORTH ONL LINE**



Appendix 2: M Read, Landscape RoR evidence

APPENDIX 3 – CORRECTED ONL LINE MAP FOR GRANT (455)



Appendix 3: M Read, Landscape RoR evidence