

# Wendy Moginie (Landscape Architect) on behalf of Corona Trust

## Responses to Koko Ridge Questions

(Please note that the questions have been modified as per the Panel's directions)

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1. Can Ms Moginie confirm that her evidence and opinions presented have relied on her making an assumption that the site boundary is located at the terrace edge?

### **Response**

*My evidence, including the landscape and visual assessment and opinions presented have focused on the site boundary as marked on the plans, and not the terrace edge.*

**Refer Graphic Attachment.**

2. Can Ms Moginie confirm that there is no 10m set back from the site boundary or the terrace edge? Can Ms Moginie confirm that she has made an error in her evidence in this respect.

### **Response**

*I understand that there is no requirement for this, and I accept there was an error in my evidence in regard to this. Confusion may have arisen from a plan prepared by Koko Ridge showing a 10m building setback for built form from the terrace edge as part of Resource Consent RM190533, in response to Corona concerns, specifically as a means to mitigate effects of the development on the site at 53 Maxs Way. This does not change my opinion as set out on my Evidence in Chief, particularly considering the considerable difference in scale between the resource consent and what would be enabled through the rezoning.*

3. Does Ms Moginie accept that the purpose of the 75m Building Restriction Area is to implement a design control to protect amenity / views from the State Highway, not adjoining properties?

### **Response**

*I have reviewed the PDP regarding the 75-metre building restriction area, and there is nothing I can find that indicates this was a control solely to protect the amenity and views from the State Highway 6. I understand that a breach of this rule was*

*unavoidable given the positioning of the Koko Ridge land which I understand triggered the need for a non-complying resource consent, alongside other breaches.*

4. Paragraph 27 – Is a landscape and visual effects assessment like Ms Moginie has prepared appropriate for an urban environment? Ms Moginie’s conclusions repeatedly refer to non-urban spaces and *landscape values* rather than the urban environment e.g. paragraph 30, or ‘Open space and visual amenity values’ paragraph 27, or visual amenity (paragraphs 45, 55 EIC).

**Response**

*The landscape and visual effects assessment is appropriate for the assessment of effects within this environment. It is not uncommon for zonings within urban environments to have controls on where buildings are located, particularly around sensitive terrace edges and prominent landform locations, and for zoning within urban environments to be transitional (for example from higher to lower density). The Corona site will remain within the Large Lot Residential A zone, and that interface requires consideration.*

*I consider the LLR-A Zone ‘which allows for low density living opportunities’ to include elements that are more akin to a ‘rural setting’ and therefore in my opinion the LLR-A Zone in this location is a transitional buffer zone between the Shotover River ONF and higher density residential zones. The PDP<sup>1</sup> clearly states the zone purpose of ‘the Large Lot Residential Zone provides low density living opportunities within defined urban growth Boundaries. The zone also serves as a buffer between higher density residential areas and rural areas that are located outside of urban growth boundaries.’*

*The Ladies Mile zone also has policies around effects on neighbouring sites and the need for integration; therefore, it would be irresponsible from a landscape perspective not to consider how it interfaces with each other, which I consider has been done in my landscape evidence.*

5. Deleted by Panel.

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<sup>1</sup> Queenstown Lakes District Council - Proposed District Plan Decisions Version (Mar 2023)

6. What elements of the permitted baseline were included or excluded in Ms Moginie's assessment of visual effects with respect to viewpoints 1 -11 in Appendix 1 of her evidence?

**Response**

*I refer to my assessment of visual effects with respect to Viewpoints 1-11 in Appendix 1, which includes the consented Koko Ridge Development encompassing four 5.5m high single storied dwellings (consented but as yet built), setback 4m from the cadastral boundary, separated by areas of open space allowing for views beyond. Refer Graphic Attachment.*

*With regard to the 'permitted baseline', my view is that the extent of consented built form is not comparable to what could potentially arise from the proposed LDR Precinct and therefore I do not consider the 4m boundary setback promoted by Koko Ridge particularly useful in terms of landscape mitigation.*

*The applicability or otherwise of a permitted baseline is best left to the planners.*

7. Deleted by Panel.
8. Can the reference to 'row of up to 15 dwellings' be explained? If a shape factor is applied as per the Low Density Suburban Residential zone of 15m x 15m, then it is not possible to achieve 15 dwellings along the shared boundary.

**Response**

*This question infers that the proposed zoning of the Koko Ridge land is to be Lower Density Suburban Residential Zone which is under Chapter 7 of the PDP whereas I understand that the land is being zoned Ladies Mile and afforded a 'Low Density Residential Precinct'. I have conferred with Mr Giddens on this.*

*Applying the provisions that have been suggested in the rebuttal of Mr Jeff Brown, the LDZ Precinct will enable 11 residential dwellings along the boundary of 53 Maxs Way, possibly 12. This number would be much greater if applied along the length of the terrace.*

*In terms of key parameters, I have assumed a density of 300m<sup>2</sup> (49.5.1), a 5.5m building height (49.5.2), 40% building coverage (49.5.4), recession plane applying from the southern boundary (49.5.5), a 4m setback from the southern boundary for a residential unit on each site, including one example also showing an accessory building (such as a garage or sleep out) located on the boundary with windows facing out to the south over Maxs Way (the restriction only applies to internal boundaries), and a maximum building length of 16m (49.5.7).*

**Refer Graphic Attachment – Sheets 6 and 7.**

9. Does Ms Moginie recognise that the LLR-A zone is an urban residential zone under the PDP when stating the proposed LDR will result in “an increased urban character”.

**Response**

*I recognise that the Large Lot Residential Zone is situated within the Urban Growth Boundary and located within an urban residential zone. I also understand that the purpose of the LLR-A zone is to allow ‘for low density living opportunities’ and to ‘serve as a buffer zone between higher density residential areas and rural areas.’ The proposed Low Density Residential Precinct within the adjoining Koko Ridge will reflect a much higher density and character of urban development than existing under the LLR-A, resulting in an increased urban character.*

10. Deleted by Panel.

11. Deleted by Panel.

12. Deleted by Panel.

13. Appendix 1 & whole brief of evidence - What date did Ms Moginie attend 53 Max's Way?

**Response**

*I visited both the site at 53 Maxs Way site and the Koko Ridge Subdivision on Thursday 24<sup>th</sup> August 2023. I made a further visit to 53 Maxs Way on Sunday 29<sup>th</sup> October 2023.*

14. Appendix 1 - If a visual effect was 152m away would your opinion on the assessment of the significance of that visual effect change if it was 150m away (i.e. a 2m difference)?

**Response**

*In my opinion making such a judgement call is a matter of context and scale. Generally, the further away something is from the receiving viewer, the lower the visual effect. Focussing specifically on the adjoining Koko Ridge property, the location of built form near an 8-9m high terrace edge, positioned above dwellings at 53 Maxs Way serves to heighten the visual effect. A 2m change at 150m of a 5.5m high building would be the difference between a single level and a double level dwelling, and it would be reasonable to assume that the upper level of dwellings within the proposed LDR zone would have windows or balconies orientated towards the south. This is in order to capture views of surrounding mountains, and reflective of the many other southern facing dwellings located on Queenstown Hill which orientate towards views. These range of factors, increase visual effects and lead to other flow on adverse effects with loss of privacy and dominance of built form.*

15. Appendix 1 - Did Ms Moginie use a 50mm aperture prime lens for the photographs presented in Appendix 1? If not, please state the lens/es used for the photographs and also state the editing treatments applied to the images to produce Appendix 1.

**Response**

*Photographs were taken using an Olympus OM-D E-M10 Mark II Camera with 25mm aperture lens (equivalent to 50mm on this camera). A series of nine portrait orientation photographs (each 27degrees HfoV) overlapped by half of each frame (13.5degrees) resulting in approximately 121.5degrees HfoV by 40 degrees VFoV. Editing treatments used involved the use of Photoshop to automatically stitch a series of nine consecutive portrait images to produce each of the single panorama images 1-12 used in Appendix 1 of the Graphic Attachment.*

16. Appendix 1 & whole brief of evidence - What date were the photographs taken for the images presented as Figure 1 & 2 and Viewpoints 1 - 12 included in Ms Moginie's brief of evidence.

**Response**

*Photos taken for the Figure 1 and Figure 2 images were taken on 15 November 2022, while photos used for Viewpoint 1-12 panorama photos were taken on Thursday 24<sup>th</sup> August 2023.*

17. Appendix 1 - Where is Ms Moginie's cross-section on pages 14 -15 of Appendix 1? Can this be shown on a plan view please? Also advise the source and measurement errors/accuracy of the underlying contour data and describe any magnitude of the vertical exaggeration applied to the cross-section images.

**Response**

*The cross sections A-D are all from the same location, as are additional cross-sections E-F. Refer **Graphic Attachment**.*

*The underlying data used was sourced from the following website:*

[https://qldc.maps.arcgis.com/apps/webappviewer/index.html?id=06e3573625ac4b9f90c45c13651f29c6&fbclid=IwAR2JO5G5vnNLfqmtXVe3xqRq8W5\\_uZa7TKrZLLBDWQoKISUDTKpzc0oVOFk](https://qldc.maps.arcgis.com/apps/webappviewer/index.html?id=06e3573625ac4b9f90c45c13651f29c6&fbclid=IwAR2JO5G5vnNLfqmtXVe3xqRq8W5_uZa7TKrZLLBDWQoKISUDTKpzc0oVOFk)

*Please refer to Eagle Technology, LINZ, StatsNZ, NIWA, DOC, © OpenStreetMap contributors, Natural Earth regarding the source and measurement errors/accuracy of the underlying contour data. No magnitude of vertical exaggeration was applied to the cross-section images which at scale, directly reflect / relate to contour data information.*