BEFORE THE QUEENSTOWN-LAKES DISTRICT COUNCIL

IN THE MATTER

of a hearing on submissions to the Proposed Queenstown Lakes District Plan pursuant to clause 8B of the First Schedule to the Resource Management Act 1991

ON BEHALF OF

TEECE IRREVOCABLE TRUST NUMBER 3 (#2599)

EVIDENCE OF BENJAMIN ESPIE (LANDSCAPE ARCHITECT) 24th AUGUST 2018

Submitter





1. INTRODUCTION

- 1.1 My name is Benjamin Espie. I reside in Queenstown. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the Southern Branch of the New Zealand Institute of Landscape Architects and was the Chairman of that branch between 2007 and 2016. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004 I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council (QLDC).
- 1.2 The majority of my work involves advising clients regarding the protection of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development. The primary objective of these assessments and evidence is to ascertain the effects of proposed development in relation to landscape character and visual amenity.
- 1.3 Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in the rural areas of a number of districts. I have provided Environment Court evidence in relation to the landscape categorisation of the parts of the Queenstown Lakes District north of Lake Wakatipu, and in relation to many resource consent applications in this part of the district.
- 1.4 I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note of November 2014 and agree to comply with it. This evidence is within my area of expertise, except where I state that I am relying on information I have been given by another person. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.



2. SCOPE OF EVIDENCE

2.1 The purpose of this evidence is to assist the Hearings Panel on matters within my expertise of landscape architecture and landscape planning in relation to Submission #2599 on the Proposed District Plan (PDP). In relation to this submission, I have been asked by the submitter to prepare evidence in relation to the landscape and visual effects of the requested new areas of Upper Glenorchy Visitor Accommodation Sub Zone (UGVASZ) at Mill Flat.

3. EXECUTIVE SUMMARY

- 3.1 The relief sought has been detailed in Ms. Stewart's evidence. Appendices 1 and 2 attached to my evidence define the spatial extent of the proposed areas of UGVASZ.
- 3.2 I consider that development enabled by the requested relief would accord with the Strategic Directions sections of the PDP as they relate to landscape issues. I consider that enabled development would be appropriately absorbed in terms of both landscape character and visual amenity.

4. AMENDED RELIEF

- 4.1 The relief sought has been amended since the time of the lodgement of the relevant submission as is detailed in the evidence Ms. Stewart. In relation to landscape maters, the most relevant aspects of the relief sought are:
 - Two areas of UGVASZ are proposed, being the two areas shown on Appendices 1 and 2.
 Visitor accommodation, residential activity and buildings are provided for within these areas as restricted discretionary activities with a maximum total built footprint of 2000m² in the western area (Area A) and 400m² in the eastern area (Area B).
 - Building height is restricted to 5.5 metres.
 - The matters to which discretion is reserved are:
 - location, external appearance, size and colour of buildings;



- visual prominence from both public places and private locations;
- associated earthworks, access, parking and landscaping;
- provision of water supply, sewage treatment and disposal, electricity and telecommunication services (where necessary) lighting;
- natural hazards (including tree windfall);
- indigenous vegetation clearance, restoration and enhancement.
- 4.2 The areas of UGVASZ sit within an Outstanding Natural Landscape (ONL). Therefore, I understand that when resource consent applications are pursued (although they may be of a restricted discretionary status) the ONL Objectives and Policies from Chapter 6 of the PDP will be relevant.

5. LANDSCAPE CHARACTER

EXISTING LANDSCAPE CHARACTER

- 5.1 The entirety of the Teece landholding (276.5ha) is within the Rural Zone (RZ) and within the ONL as identified by the PDP. The geomorphology of the landholding is described in Mr Bryant's report that is appended to the evidence of Ms Stewart. The landholding takes the shape of a north-pointing peninsula surrounded to the north and west by the forest of Mount Aspiring National Park (and/or Lower Dart Conservation Area), to the west by the Dart River and to the south by the farmed lands of Arcadia Station. Most of the landholding itself takes the form of grazed pasture, however, approximately 79ha of it takes the form of mature beech-dominated forest, akin to the National Park. This forested part of the landholding lies to the east of Glenorchy Paradise Road that bisects the site in a north-south direction. There are no buildings on the site. It accommodates a network of farm fences and is grazed by sheep and cattle.
- 5.2 The grazed pasture area of the landholding is traditionally known as Mill Flat. At a broad scale, it is part of the Dart River Valley which sits between the Humboldt and Forbes mountain ranges.
- 5.3 The landscape to the north of Lake Wakatipu is dominated by the vast, steep mountain slopes of the Richardson, Humboldt and Forbes mountain ranges. These mountain ranges are comprised of weathering up-thrust schistose bedrock and generally have been farmed much more minimally than the flatter land and are frequently covered in remnant native ecology. The river valleys of



the Dart to the west and the Rees to the east converge in a Y-shape around the lone peak of Mount Alfred as they enter the lake. The flat floors of these valleys are comprised of deposited post glacial materials and have generally been the location of intensive agriculture, grazing and ecological modification since the colonial period.

- 5.4 The rugged forms of the mountains that rise up from the more tamed and verdant pastoral valley floors are striking to visitors to the area and are romantic and sublime in terms of aesthetics. Changing light, weather (including frequent snow cover) and atmospheric conditions can create dramatic effects and I believe that it would be generally shared and recognised by observers that these mountain ranges are majestic, natural and memorable.
- 5.5 The farmed valley floors are not as natural or dramatic in appearance. I believe that it would generally be obvious to observers that these valley floors have been much more modified than the mountain slopes, are less striking and have more in common with many parts of rural agricultural New Zealand. The expansive gravel beds of the braided rivers themselves however are remarkable and obviously natural features. When perceived as a whole, I agree that the landscape in question is undoubtedly an ONL.

EFFECTS ON LANDSCAPE CHARACTER

5.6 Landscape effects are the effects that an activity may have on the landscape as a resource in its own right; effects on the patterns and processes that make up the landscape, rather than effects relating to views or visibility.

Western UGVASZ (Area A)

An approximately 7500m² area of UGVASZ is requested, as shown on Appendix 1. This UGVASZ area occupies a terrace area that sits above the level of the Dart River floodplain but below the level of the surrounding grazed pasture. A large and dense stand of willows marks the southern edge of this western UGVADSZ area. The proposed provisions would enable up to 2000m² of built form within this area as a restricted discretionary activity, with building and landscape design being subject to discretion. I understand that the Objectives and Policies of Section 6 of the PDP (perhaps most relevantly Policies 6.3.12 to 6.3.18) would be relevant and applicable to any assessment.



- 5.8 In this area I understand that the landowner envisages a homestead-like building (or small collection of buildings) that would be used as a visitor accommodation lodge, potentially incorporating an owners dwelling and would be likely to have some accessory buildings (including perhaps a manager's residence) associated with it. The proposed provisions restrict the amount of built form and the over-arching provisions require it to be reasonably difficult to see.
- 5.9 The topography of this area of UGVASZ is such that a homestead-like cluster of buildings would sit within a broad terrace area with dramatic views to mountain peaks to the north. The bed of the Dart River would lie approximately 100 metres to the south. I anticipate that in order to accord with the proposed provisions, a homestead-like cluster of buildings would need to be designed so as to be of a relatively low height, include comprehensive landscaping and planting that would tie it into its context and screen it from the south, and have some design reference to traditional rural architecture. I anticipate that vehicle access would need to be sensitively designed so as to appear inconspicuous and akin to a rural farm road.
- 5.10 In terms of landscape character, the new element that would appear in the landscape would be a rural form of building that accommodates visitors and managers/owners. This would sit some 2.5km north of the nearest farm sheds and 3.5km north of the Paradise Trust and Arcadia homesteads. It would be the northernmost building before the national park begins and would be a relatively isolated rural element surrounded by a large area of open pasture.
- 5.11 In terms of landscape patterns, I do not consider that a building (or small cluster of buildings) in this location would be an unexpected element or an element that is incongruous in relation to rural settlement patterns. The separation from the homesteads to the south is considerable and a homestead to service the Mill Flat area would not necessarily be unusual in terms of colonial farming. I understand that Mill Flat was used for processing and milling native timber in the colonial period and used to accommodate considerable activity and buildings of a temporary or semi-temporary nature.
- 5.12 The activities that are enabled to be proposed, while perhaps appearing somewhat like a farm homestead, would in fact be of a visitor accommodation nature. Again, I consider that relatively isolated instances of visitor accommodation in rural and ONL areas are not discordant with outcomes sought by the PDP and do not necessarily degrade landscape character. Blanket Bay Lodge, Minaret Station Alpine Lodge, Moonlight Lodge and Kinloch Lodge are examples of this



sort of activity. The location of the proposed western UGVASZ is such that a lodge in this location will be particularly well absorbed into existing landscape character such that the open pasture, surrounding mountains and broader ONL will very much dominate character.

5.13 Overall, I consider that the relief sought in relation to the Mill Flat area will not adversely affect landscape character.

Eastern UGVASZ (Area B)

- 5.14 An approximately 33ha area of UGVASZ is requested, as shown on Appendix 2. This eastern UGVASZ area occupies the northern part of a fan landform that is covered in mature beech forest as described previously. This fan is somewhat raised above the open pasture to the west and slopes gently towards it. The uppermost part of this UGVASZ area is approximately 50 metres in elevation higher than the open pasture that lies west Glenorchy Paradise Road.
- 5.15 The proposed provisions would enable up to 400m² of built form within this area as a restricted discretionary activity, with building and landscape design (including vegetation clearance and ecological enhancement) being subject to discretion. Again, I understand that the Objectives and Policies of Sections 6 and 33 of the PDP would be relevant and applicable to any assessment.
- 5.16 In this area I understand that the landowner envisages a visitor accommodation activity that could be described as a high-end cabin-in-the-woods type of activity involving an accommodation building or small number of buildings, no guest vehicle access, a minimum of vegetation clearance and a programme of ecological enhancement. I understand that it is envisaged that this activity would be an adjunct of the homestead/lodge activity in the western UGVASZ such that car-parking, reception and dining activities would all occur in the homestead/lodge area. Guests would be taken to the forest location by foot or small vehicle (Polaris or similar).
- 5.17 The area of forest within the landholding has been unfenced and subject to stock browsing for many decades. As such, it is old-growth forest with little in the way of regrowth. I understand that the ecological health of the forest could be significantly improved by some ecological management measures. I also understand that windthrow of trees is a relevant hazard. Avoidance of this hazard would require that a clear area is left around buildings. I understand that the extent of this clear area will depend upon the exact location of a proposed building.



- 5.18 I anticipate that in order to accord with the proposed provisions (and other relevant provisions of the PDP), a visitor accommodation facility in this forest setting would need to be designed so as to be of small scale, with minimal vegetation clearance (although this is still likely to be a considerable area), an inconspicuous access track and would include vegetation management measures and planting to bring about ecological enhancement.
- 5.19 In terms of landscape character, visitor accommodation buildings and activity would be a significant new instance of human occupation and modification within the broader forested area that skirts this western face of the Forbes Mountains. It would be the first permanent (or semi-permanent) human occupation in this forested area. The forest has certainly been selectively felled in the past and there are some tracks through it but there is no evidence of occupation. As such, I consider that the new element(s) would decrease the natural character of the vicinity and increase modification. Notwithstanding this, the native forest would continue to be the dominant and defining element of landscape character.
- 5.20 I consider that in order to accord with the outcomes sought by the PDP, the loss of natural character described above would need to be balanced. It appears that there is considerable opportunity to do so, given the degraded condition of the forest that sits on the relevant landholding. I consider that a future development enabled by the proposed provisions could (and would have to) include measures that enhance the ecological health and value of the forested area, such as the exclusion of stock, animal and plant pest management and areas of direct planting (probably most usefully on the periphery of the current forested area).
- 5.21 I therefore consider that the proposed provisions (coupled with the other provisions of the PDP) give certainty that a suitable result will be achieved. The visitor accommodation activity in the forested area, while inconspicuous, will reduce natural character. Ecological enhancement measures will improve the health and value of the forest that sits on the relevant landholding and will preserve and enrich it into the future.



6. VIEWS AND VISUAL AMENITY

WESTERN UGVASZ (AREA A)

- As has been discussed, the requested western UGVASZ occupies an area of lower topography, the level of which sits approximately 10 metres below the closest part of the Glenorchy Paradise Road. As described above, I anticipate that a future development in this area would include landscaping that bolsters and enhances (and perhaps ultimately replaces) the visual screening provided by the existing willows and that creates a landscaped setting that ties into its immediate context.
- Observers that have the potential to have their views or visual amenity affected by the requested VASZ area are:
 - users of Paradise Glenorchy Road,
 - users of the Dart River and its associated corridor,
 - users of DOC land immediately west of the VASZ,
 - users of elevated DOC to the west of the VASZ (near Lake Sylvan or in the Humboldt Mountains),
 - users of elevated DOC to the east of the VASZ (in the southern reaches of the Forbes Mountains).
- 6.3 Marked-up photographs are included as Appendix 4 to this evidence. Photography points are shown on Appendix 3.

Paradise Glenorchy Road

6.4 Beyond Arcadia homestead and Diamond Lake, Paradise Glenorchy Road accesses the Chinaman's Bluff part of Mount Aspiring National Park, which is one of the two endpoints of the Rees-Dart Track, a 4 or 5-day tramping track. The road is relatively rough and involves some river crossings. As such it is relatively infrequently used by self-drive tourists.



- 6.5 With reference to Appendix 3, views to the western UGVASZ area are potentially available from an approximately 1.5km stretch of Paradise Glenorchy Road as it passes to the east. Viewing distances are between 450 and 1200 metres.
- As discussed, the western UGVASZ area occupies an area of lower topography that sits below the main paddock area of Mill Flat. The south-eastern edge of the UGVASZ is defined by a large dense stand of willows.
- 6.7 Total built form in this area is proposed to be restricted to 2000m² and a maximum height of 5.5 metres is to be provided for. As mentioned, the landowner envisages a homestead-like building or buildings that would be used as a visitor accommodation lodge and would have some associated accessory buildings. As discussed, I understand that the PDP Chapter 6 ONL policies are applicable, including the policy that built form be reasonably difficult to see. Given the location, topography and context of the western UGSASZ area, I consider that these provisions are able to be met and I envisage that the design of a successful resource consent application is likely to include a cluster of buildings that simulate a rustic, rural homestead layout as well as outdoor/garden areas. Landscape design would maintain and enhance the existing natural character and would be likely to build on and bolster the existing willows and beech forest to the west, in order to contain the built form and activity while allowing the dramatic, long views to the north to be maintained.
- 6.8 Following on from the above, I consider that the visual experience of Glenorchy Paradise Road users is such that:
 - Travelling from the south, a road user is almost past the western UGVASZ before there is any visual access to it. Views are illustrated by Photograph 1 of Appendix 4. Topography means only some upper parts of built form would be exposed to potential view. Vegetation design could considerably (or completely) screen built form. Some partial visibility of buildings and a vehicle access track would trigger recognition in an observer's mind that some built element exists in this location. However, some farm-related buildings in a location of this sort would not be entirely unexpected and they will be relatively distant, peripheral and inconspicuous in relation to existing views. I am confident that development that goes through a restricted discretionary resource consent application would be reasonably difficult to see and that the visual amenity of a Glenorchy Paradise Road use would be affected to a very low degree.



Travelling from the north, the western UGVASZ is more central in the midground of views of road users. However, distances are still long and are over variable topography. Again, future built form would sit well below the level of the main paddock area of Mill Flat. Views are illustrated by Photograph 2 of Appendix 4. Photograph 3 is taken from inside the western UGVASZ facing north. Dramatic views to mountain peaks are available (although are rather hidden by cloud in this photograph) but the foreground is truncated; there is no need or desire to gain views that include the paddock-land or the Glenorchy Paradise Road. Again, I consider that building design and location, coupled with landscape design, would mean that built form is either entirely hidden or is difficult to see. Some partial visibility (even if only of the vehicle access track) would trigger recognition that some human element exists in this location but it would be an inconspicuous element that is not important to the composition of views or quality of visual amenity. Again, I am confident that the proposed provisions would bring about development that is at least reasonably difficult to see and does not degrade visual amenity.

Dart River

- 6.9 The western UGVASZ is largely hidden from the Dart River corridor by the stand of exiting willows and the dense beech forest on the neighbouring DOC land to the west. Some views are available through the gap between these two areas of vegetation. Such views would be from the south and southwest. Photographs 4 and 5 illustrate this.
- 6.10 The relevant area of the Dart River corridor takes the form of a broad gravel bed accommodating braided river channels. It can be accessed from Glenorchy Paradise Road by a roughly-formed public road that lies 1.5km south of the western UGVASZ. I imagine that the river corridor is used by recreationalists including fishermen and is also used for commercial jet boat trips by Dart River Safaris.
- 6.11 Again, I understand that the relevant Chapter 6 Policies of the PDP would require built form to be reasonably difficult to see. I also understand that the landowner does not envisage that any views to the south are required or desirable from a future lodge development, although guests would be able to access the Dart River corridor by foot. I envisage that landscape design that would be required as part of a resource consent application would therefore fill the current gap



in vegetation and would bolster the screening effect of the existing willows (and perhaps provide for succession/replacement over time).

6.12 I consider that development enabled by the proposed relief would be minimally visible (if at all) from the Dart River corridor. I consider that the visual amenity of a river user would be affected to a very low degree at most.

DOC land to the immediate west of the western UGVASZ

- An area of DOC land described as LG 680 PT SECS 24 25 BLK II DART SD sits to the immediate west of the western UGVASZ as can be seen on Appendix 3. This land is administered by DOC but is not part of Mount Aspiring National Park. It takes the form of dense beech forest and I am unaware of any tracks through it or how it is used by the public.
- 6.14 Given the dense forest cover, a user of this DOC land would need to walk to its eastern edge to gain views of the proposed western UGVASZ. I am not sure of topography but I imagine that this is potentially possible.
- 6.15 I consider that the detailed design of future development (subject to the restricted discretionary provisions as proposed) could suitably mitigate visual effects from this location. Landscape and vegetation design could appropriately extend a strip of beech forest vegetation onto the subject site. As discussed previously in relation to other views, landscape planting that frames the future development areas will be an important aspect of future design and the proposed maters of discretion encompass this.

Elevated DOC land to the west

- 6.16 With reference to Appendix 3, DOC land on the western (true right) side of the Dart River takes in many areas of high topography near Lake Sylvan or in the Humboldt Mountains. It appears that some distant views to the western UGVASZ would be available, although a 592masl hill to the immediate east of Lake Sylvan would block many views, including those from the Lake Sylvan Walk and the Lake Sylvan Rockburn Track.
- 6.17 Topography within this public land is mountainous and particularly variable. There are likely to be locations where a potential line of sight to the western UGVASZ is available although many



such locations are difficult to access and are likely to be very infrequently visited. Viewing distances are often many kilometres. Additionally, most of this land is covered in beech forest meaning that long views are often excluded.

6.18 I consider that, in general, visibility of the western UGVASZ would be very difficult. Design measures such as roofing and cladding colour and vegetation design would also reduce potential visual effects. I consider that users of this elevated western DOC land are very unlikely to be affected by the proposed relief.

Elevated DOC land to the east

6.19 One of the southernmost spurs of the Forbes Mountains lies to the east of the subject landholding. This spur runs south from Turret Head. The upper west-facing slopes of this spur are within the Lower Dart Conservation Area or Mount Aspiring National Park. The upper parts of Dundas Creek and the River Jordan drain these slopes. These slopes are steep and forest-covered. They may be used by particularly intrepid hunters or mountaineers but no tracks traverse them. From the uppermost parts of these slopes (which are above the tree line), it appears that some views to the western UGVASZ would be available at distances of 3.5 kilometres and more. From such viewpoints a vast panorama would be available that would include Arcadia and the Paradise Trust land. I imagine that built form within the western UGVASZ and also an access track running to it would be discernible but would be a very small component of an extremely broad view. I do not consider that there would be any relevant effect on visual amenity.

Summary regarding visual effects of the western UGVASZ

6.20 I consider that visual effects of the proposed relief are likely to only be relevant as experienced from Glenorchy Paradise Road and from the Dart River corridor. In both instances, I consider that the proposed relief, in conjunction with other parts of the PDP, will ensure that visual effects are appropriate and that development is reasonably difficult to see.

EASTERN UGVASZ (AREA B)

6.21 The requested eastern area of UGVASZ takes in approximately 33ha but only a total of 400m² of built footprint is provided for. As described in paragraphs 5.15 and 5.16, a small adjunct visitor



accommodation activity is envisaged here and some manner of ecological enhancement would be associated with this. It is not envisaged that guest vehicle access would be available to the facility and I note that access and earthworks are both maters of discretion.

- 6.22 I consider that there is ample opportunity to locate up to 400m² footprint of visitor accommodation activity within this 33ha area such that it is entirely hidden from view from outside the site, apart from in particularly distant views from minimally accessible mountain locations near the peaks of the Humboldt and Forbes mountains. I consider that such visibility would certainly be reasonably difficult and I consider that the proposed provisions appropriately reserve Council discretion over location and visual prominence and would ensure and appropriate degree of visibility.
- 6.23 The one aspect of a future visitor accommodation facility in the eastern UGVASZ that is likely to be visible to users of Glenorchy Paradise Road is part of an access track. As mentioned, it is envisaged that guests would be transported to the visitor accommodation facility by foot or small vehicle. As such, only a narrow and relatively roughly formed type of track would be necessary. Such a track would need to adjoin Glenorchy Paradise Road at some point; most suitably perhaps at the northern or southern end of the forested part of the landholding.
- 6.24 I am aware that many DOC huts (including some very large ones) that occupy remote forested locations are built using helicopter access. All forest clearance and all transport of building materials is done via helicopter with only foot access to the site. Such a technique could be used in this case.
- 6.25 In any event, I consider that the access track that will ultimately serve the facility should be handled carefully so as to have minimal adverse visual effect. I consider that this is likely to require it to be relatively narrow, roughly formed, to adjoin Glenorchy Paradise Road at an appropriate location and to have no conspicuous signage. Given that access, earthworks, visual prominence, landscaping and indigenous vegetation clearance/enhancement are all matters of discretion, I consider that he proposed relief gives confidence of an appropriate result.
- 6.26 Overall, I consider that the proposed eastern UGVASZ will have minimal visual effects.



7. CONCLUSIONS

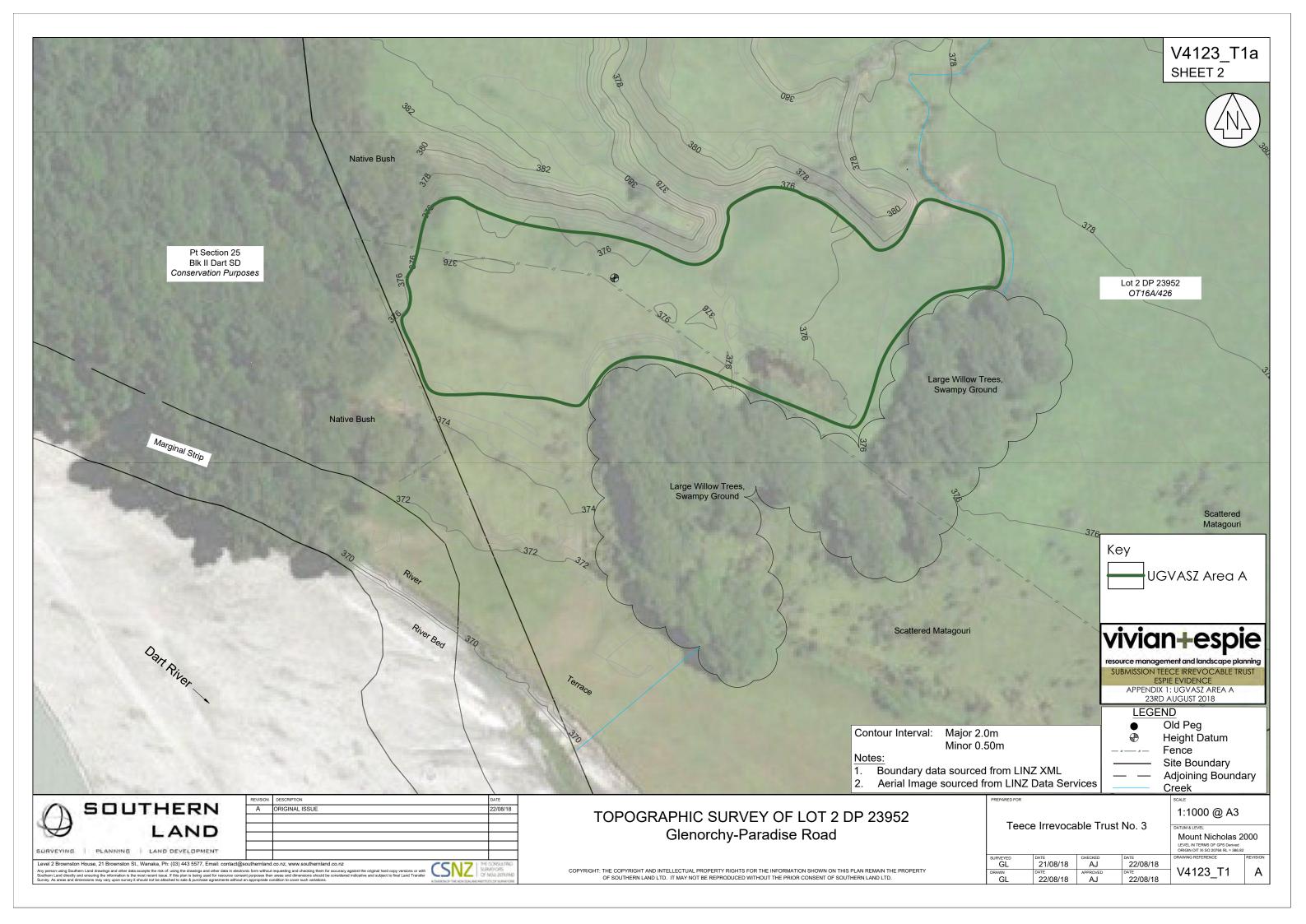
- 7.1 The amended relief that is sought would enable two nodes of visitor accommodation activity as restricted discretionary activities. Total footprint area of built form (as well as other factors) are considerably restricted.
- 7.2 The western UGVASZ area would develop as a cluster of buildings in a location that is contained by landform and vegetation. The proposed provisions are such that design would involve landscaping that would ensure visual containment. This would be an element of human occupation and landscape modification but would be in a location that has logic and merit. Some views to this western UGVASZ are available from part of Paradise Glenorchy Road and the Dart River corridor but the location and proposed provisions are such that I consider development will be reasonably difficult to see and will not inappropriately affect visual amenity or landscape character.
- 7.3 The eastern UGVASZ area would develop as a visitor accommodation facility surrounded by mature beech forest on part of the relevant landholding. In terms of landscape character, this would be a significant new element of human modification that discords with natural character. However, the proposed provisions require consideration vegetation restoration and enhancement and there appears to be ample opportunity for this to be done. I therefore consider that a balance in terms of landscape character effects could be achieved. In terms of visual effects, the enabled activity would be very well hidden. The proposed provisions retain discretion in relation to all important factors, including (relevantly) access.
- 7.4 Overall, I consider that the requested relief is appropriate in terms of effects on landscape character and visual amenity.

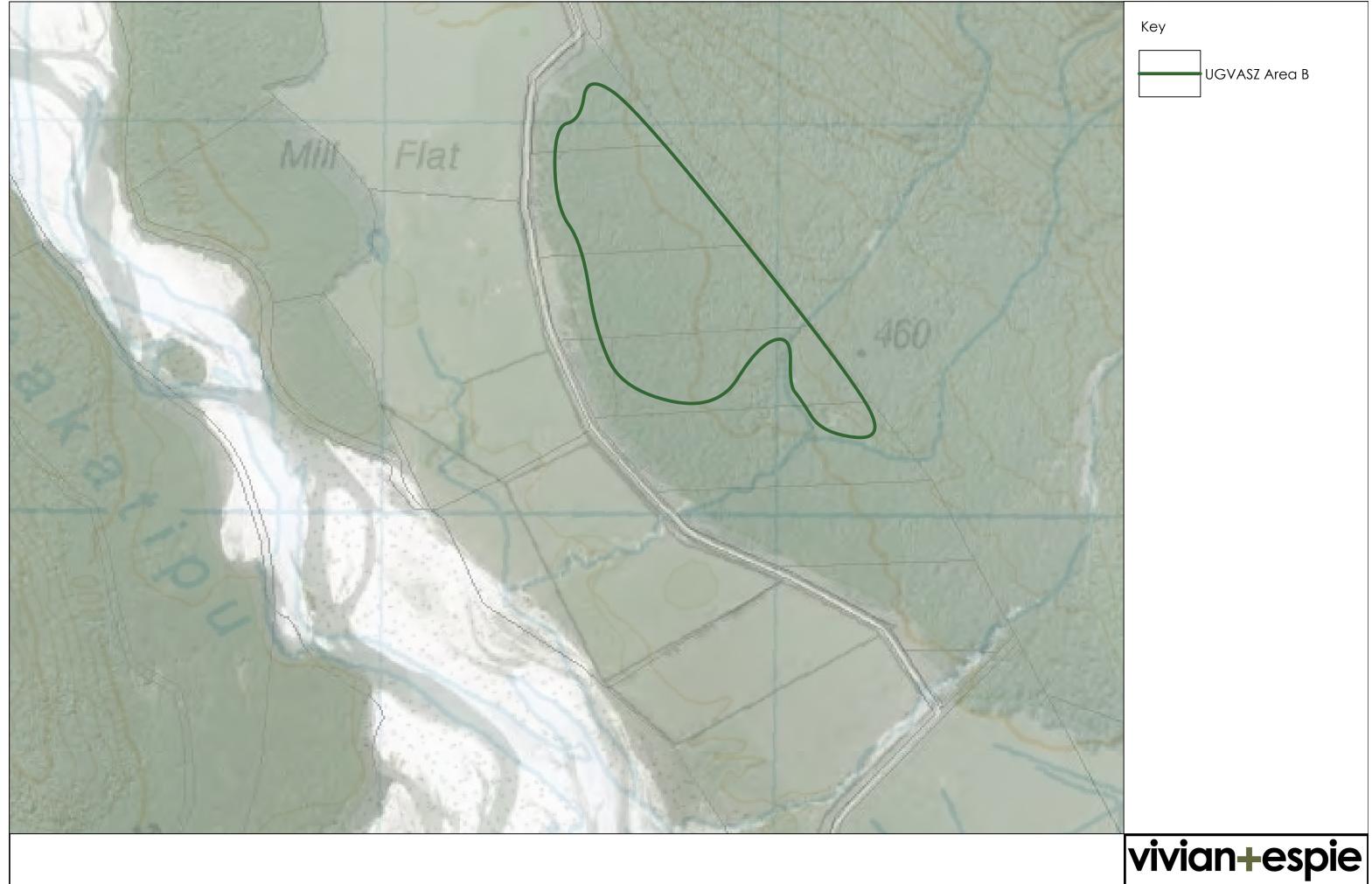


ATTACHED APPENDICES

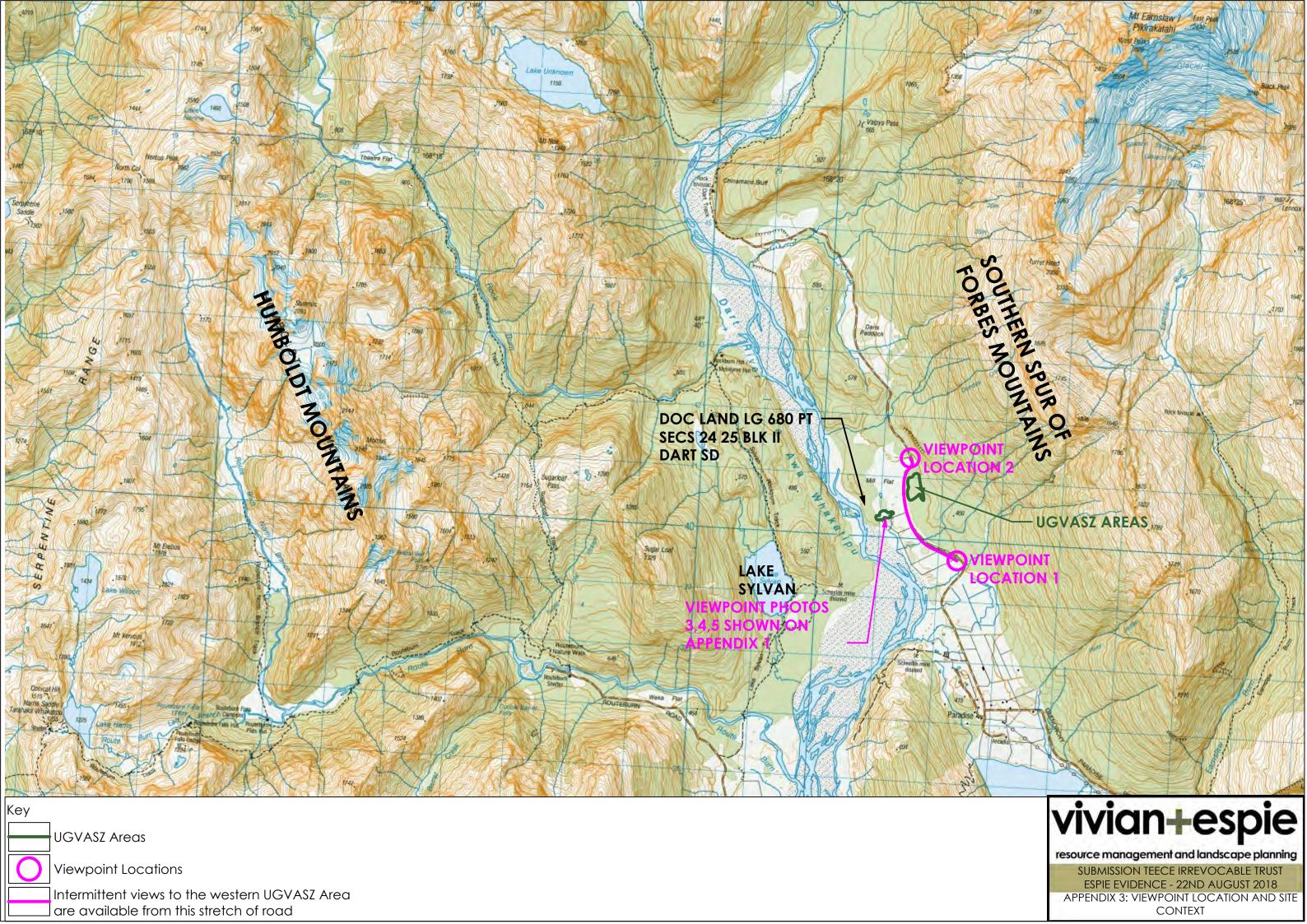
- 1 PLAN OF THE PROPOSED WESTERN AREA OF UGVASZ (AREA A).
- 2 PLAN OF THE PROPOSED EASTERN AREA OF UGVASZ (AREA B).
- 3 A CONTEXT PLAN OF THE UGVASZ AREAS.
- 4 PHOTOGRAPHS.

Ben Espie vivian+espie 24th August 2018



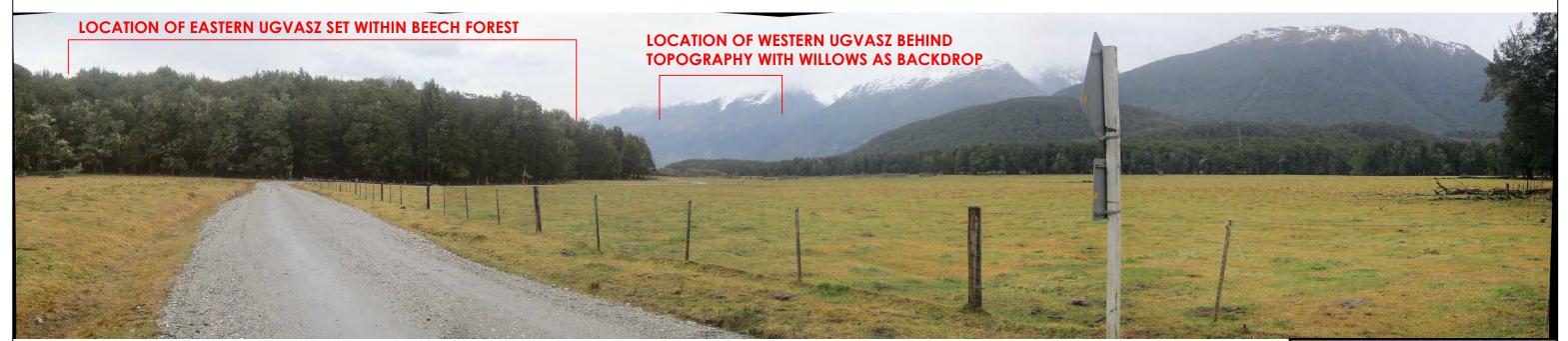


resource management and landscape planning SUBMISSION TEECE IRREVOCABLE TRUST ESPIE EVIDENCE APPENDIX 2: UGVASZ AREA B 23RD AUGUST 2018





FROM VIEWPOINT LOCATION 1 LOOKING NORTH



FROM VIEWPOINT LOCATION 2 LOOKING SOUTH

NOTE:

ALL PHOTOGRAPHS WERE TAKEN ON MONDAY 17TH AUGUST 2018 WITH A FIXED FOCAL LENGTH OF 50MM. PHOTOGRAPHS ARE INTENDED TO ILLUSTRATE POINTS MADE IN EVIDENCE.

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APPENDIX 4: PHOTOGRAPHS

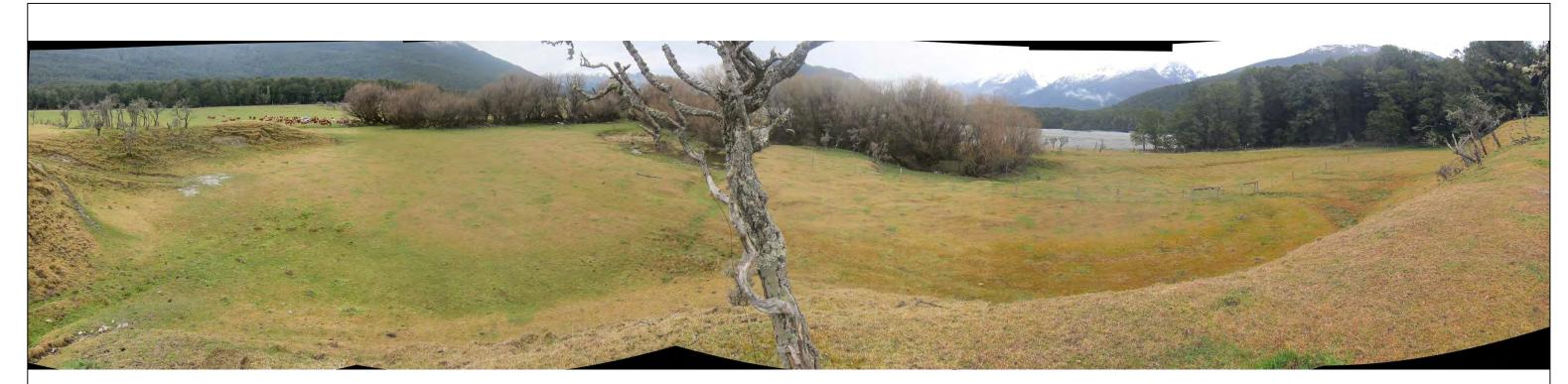


FROM VIEWPOINT LOCATION 3, WITHIN THE WESTERN UGVASZ, LOOKING NORTH



FROM VIEWPOINT LOCATION 4, IMMEDIATELY NORTH OF THE WESTERN UGVASZ, LOOKING SOUTH





FROM VIEWPOINT LOCATION 5, IMMEDIATELY NORTH OF THE UGVASZ, LOOKING SOUTH EAST

