

TO: The Hearing Administrator, Lynley Scott, [DP.Hearings@qldc.govt.nz](mailto:DP.Hearings@qldc.govt.nz)

**BEFORE AN INDEPENDENT HEARING PANEL  
APPOINTED BY QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER THE** Resource Management Act 1991 (“**Act**”)

**IN THE MATTER OF** a Variation to the proposed Queenstown Lakes District Plan (Te Pūtahi Ladies Mile) in accordance with Part 5 of Schedule 1 to the Resource Management Act 1991 (“**Variation**”)

**BETWEEN** **GLENPANEL DEVELOPMENT LIMITED (“GDL”)**  
Submitter

**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL (“QLDC”)**  
Proponent of the Variation

**STATEMENT OF EVIDENCE OF TONY DOUGLAS MILNE ON BEHALF OF  
GDL**

**DATED: 25 OCTOBER 2023**

*Before a Hearing Panel:* David Allen (Chair), & Commissioners Gillian Crowcroft,  
Hoani Langsbury, Judith Makinson and Ian Munro

### **Introduction, qualifications and experience**

1. My full name is Tony Douglas Milne. I am the founding Director of Rough Milne Mitchell Landscape Architects Ltd (RMM), formerly Rough & Milne, which is an Aotearoa wide consultancy established in 2010.
2. I have been practising as a landscape architect since 1995. Our consultancy is involved in a wide range of landscape design and land planning projects throughout New Zealand. Many projects have involved preparing reports and evidence, which address matters of visual impact and landscape effects concerning proposed developments. I have prepared numerous visual impact and landscape assessments and presented expert evidence at council hearings and before the Environment Court and Boards of Inquiry.
3. I hold a Bachelor of Arts degree from the University of Canterbury and a Bachelor of Landscape Architecture Lincoln University. I am a Fellow of the New Zealand Institute of Landscape Architect (FNZILA).
4. I am familiar with the site, and surrounding environs having made several site visits over the last three or so years. I have also undertaken, and am undertaking, several projects within the wider area and region over the last twenty years. I am currently involved in Plan Change projects in Nelson (PC28), Cromwell (PC14), Ravenswood (PC30), Queenstown (Homestead Bay) and Ohoka (PC31) that have similar landscape and visual issues as this. Within the Queenstown area, and in relation to the District Plan Review I have been engaged on projects seeking zone extensions/variations in Arthurs Point, Cardrona Alpine Resort, Victoria Flats, Ladies Mile and the Gibbston Valley.

### **Code of conduct**

5. Although this is not an Environment Court hearing, I confirm that:
  - (a) I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023;
  - (b) I have complied with the Code in preparing this evidence.

- (c) The issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions.
- (d) I have not omitted material facts known to me that might alter or detract from my evidence.

### Site Visits

- 6. With respect to site visits, my involvement with the Flint's Park proposal has given me a thorough understanding of the Te Pūtahi Ladies Mile Variation Area (**TPLM Variation Area**). I have worked on projects in the Queenstown Lakes District over the last 20 years and have a thorough understanding of the area. With specific regard to the TPLM Variation Area, I have viewed and considered the proposal over the course of several focused site visits completed between June 2021 and October 2023. During these site visits, I have taken photographs of the TPLM Variation Area. Included in this evidence are images which are relevant to the key point in my evidence.

### Scope of evidence

- 7. The methodology and terminology used in my evidence has been informed by the Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines.
- 8. I have prepared evidence (and a Graphic Attachment as **Appendix C** to this evidence) in relation to landscape character and visual amenity in general support of the submission memorandum of the Glenpanel Development Limited (**GDL**), a submitter on the Te Pūtahi Ladies Mile Variation (**TPLM Variation**). My evidence includes:
  - (a) Involvement in the Variation and GDL's submission;
  - (b) Expert Conferencing;
  - (c) Summary of principal issues;
  - (d) An assessment of the anticipated landscape and visual amenity effects raised by the extension of the Urban Growth Boundary (**UGB**) onto a lower slope (423m contour) of the Slope Hill ONF;

- (e) Assessment of anticipated landscape and visual effects as associated with an increase of the development height limits within the Glenpanel precinct of the TPLM Variation Area;
  - (f) Suggestions regarding retention of significant vegetation within TPLM Variation Area;
  - (g) Matters raised by the section 42A report and Council evidence, including any reasons for difference in opinion with Council experts;
  - (h) Matters raised by other Submitters; and
  - (i) My conclusions and recommendations.
9. I consider the key matters in question or in dispute to be:
- a. Whether a UGB can overlay an ONF in this location
  - b. Visual Effects
  - c. Effects on Landscape Character

#### **Involvement in the variation and the Glenpanel Submission**

10. My role in relation to the Glenpanel submission on the variation has been to provide advice and assessment in relation to landscape and visual effects matters. In preparing this statement of evidence I have considered the following documents:
- a. The TPLM Variation (and associated documents);
  - b. The submission memorandum of GDL (Submission) 102 on the Te Pūtahi Ladies Mile Variation;
  - c. The QLDC Proposed District Plan Slope Hill Priority Area ONF Schedule 21.22.6 (rebuttal version) and mapping (decisions version);
  - d. QLDC Proposed District Plan Schedule 24.8 Landscape Character Units;
  - e. The Whakatipu Basin Land Use Planning Study;

- f. Section 42A Report on the TPLM Variation prepared by Mr Jeff Brown, dated 29 September 2023;
- g. Evidence of Mr Stephen Russel Skelton on the TPLM Variation - Landscape and Visual Effects, dated 29 September 2023;
- h. Evidence of Ms Bridget Gilbert on the TPLM Variation – Slope Hill, dated 29 September 2023;
- i. Evidence of Ms Nicola Smetham for Milstead Trust on 21.22.6 PA ONF Slope Hill, dated 11 September 2023;
- j. Evidence of Mr Robin Alexander Keith Miller – Heritage, dated 29 September 2023;
- k. Joint Witness Statement of Landscape Experts on 21.22.1 PA ONF Peninsula Hill and 21.22.6 PA ONF Slope Hill, dated 4 October 2023;
- l. Joint Witness Statement of Landscape Experts in relation to Slope Hill ONF, dated 18 October 2023;
- m. Evidence of Mr Bruce Wier – Urban Design, dated 20 October 2023; and
- n. Evidence of Mr Mark Tylden – GDL, dated 20 October 2023.

### **Expert Conferencing**

- 11. I participated in the landscape expert witness conferencing on 18 October 2023. Where relevant in my evidence below, I refer to the Landscape Joint Witness Statement (**JWS**), dated 18 October 2023 and produced following the conferencing. I also append this as **Attachment A** to my evidence.
- 12. I note one correction (*as shown in red below*) to be made to the JWS at [12]. This should read:

12) **Messrs Milne and Compton-Moen** consider that while the TPLM Variation avoids encroaching into the Slope Hill PA ONF, the Variation will introduce urban development directly adjacent to the ONF and consequently the ONF will read as sitting behind an urban corridor.

*Potentially this will **not** compromise any shared and recognised values associated with the toe on the southern side of the Slope Hill PA ONF, due to this area being obscured in most views. This is in the context of the identified high legibility and expressiveness values of the Slope Hill ONF deriving from the visibility of this feature that enable a clear understanding of the landscape's formative processes.*

13. I make the following comments regarding the position reached by Ms Gilbert (Queenstown Lakes District Council), Mr Compton-Moen (Glenpanel Developments Ltd) and myself at our Expert Conferencing. As mentioned above, the JWS is appended to my evidence, and to avoid repetition I will not provide the same here. Rather, I will reference the JWS where appropriate and make additional comment accordingly.
14. The purpose of the conferencing was to identify, discuss, and highlight points of agreement and disagreement in relation to landscape issues relating to the Slope Hill ONF relevant to the **TPLM Variation**.
15. There was general agreement that Slope Hill ONF supports modification associated with telecommunication, airport, and farming infrastructure. Visibility of these modifications varies with distance, existing intervening vegetation, and elevation of these on Slope Hill itself. Furthermore, it was agreed that urban development throughout Ladies Mile anticipated under the Variation is likely to obscure views of parts of the lower margins of the landform feature in views from State Highway 6 (**SH6**) and parts of the Ladies Mile flats. This is expected to include parts of the lower margins of the slopes which are understood to be part of the underlying roche moutonnee landform although the rock form cannot be seen on these lower slopes, that coincide with the Glenpanel site.
16. There was general agreement that the water tanks may be able to be absorbed on the Glenpanel site with potential effects either avoided or mitigated through location and site design measures. It was acknowledged this would need to be tested by way of a detailed landscape assessment. *I refer you to Attachment A of my evidence.* There was agreement that it is not uncommon that infrastructure of this nature (water tanks) needs to be located within ONF/Ls in the district.

17. There remains a difference in opinion between the experts (Mr Compton – Moen and myself on one side and Ms Gilbert on the other) on the following matters:
- a. Whether there is a ‘blurring’ of the landscape feature boundary across the Glenpanel site; a differentiation in landscape values between the upper and lower flanks of the southern side of Slope Hill; or a ‘transitional landscape’ along the toe of the landform feature in the vicinity of the Glenpanel site;
  - b. The extent of effects of developing the proposed TPLM Variation area as notified on the Slope Hill ONF, including on the Glenpanel site;
  - c. Whether the lower slopes of what is currently shown as ONF on the Glenpanel site have capacity to absorb urban development such as that as shown in the plan “Homestead Precinct Landscape Concept”; and
  - d. The extent of effects of such urban development ([b] and [c] above) in that area.
18. These matters underpin the principal issues to be addressed and are traversed in my evidence following.

### **Summary of Principal Issues**

19. The Submitter seeks to extend the Urban Growth Boundary (**UGB**) up to the 423m contour within the Slope Hill Outstanding Natural Feature (**ONF**) overlay. This aligns approximately with the ONF boundary on the western side of Slope Hill. Unlike other submissions concerning shifting the UGB to the lower slopes of Slope Hill, the Submitter does not seek to shift the Slope Hill ONF Boundary to match the UGB, but to overlap it in order to accommodate a consenting pathway for reservoir infrastructure.
20. Potential landscape and visual amenity effects are raised by the extension of the UGB onto the lower slope (up to the 423m contour) of the Slope Hill ONF, to the extent that this provides a consent pathway for development, and for what development that might be. It is my understanding that if the UGB and ONF were to overlap, then status of the land being within the UGB would not result in uncontrolled development on the slope. The Rural

Zoning would remain, and the objectives and policies applying to the ONF would still apply. On this basis, and while a full assessment of effects, in the body of this evidence, has not been undertaken to test the UGB extension to the 423m contour, it is my view that the UGB (and limited urban development) can overlap the Slope Hill ONF in this location. The reason for this is that in my opinion that such development<sup>1</sup> would not compromise the key values of this ONF as identified in 21.22.6<sup>2</sup>.

21. In my opinion the location of the water tanks and associated mitigation in the proposed location would have no more than a minor effect on the values of the receiving landscape (*refer Attachment B*). The reason for this is twofold, first they would be placed among other built elements associated with farming activities such as sheds and access tracks located in the vicinity and second, it is considered because of the more complex (relative to the upper slopes) nature of the landscape that makes up the lower slopes/toe of Slope Hill.
22. The TPLM Variation has been put forward on the basis that it will be serviced by similar sized water tanks proposed at Flint's Park, at a similar elevation to the east of the Submitters' land. However, the TPLM Variation has not proposed to extend the UGB to accommodate these tanks, which may have been an oversight. The amended UGB will enable the Submitter placement of the water tanks in the desired location, they will be able to service the whole TPLM Variation Area, and result in a consolidated and visually recessive infrastructure element, therefore avoiding the cumulative effects of multiple infrastructure items scattered along the southern side of Slope Hill ONF.
23. The Submitter also seeks to increase the height limit within the Glenpanel Precinct from the current 8m to 17m, in order to accommodate for the floor to ceiling heights of commercial land uses and the potential for 4-storey apartments. Landscape and visual effects are associated with an increase of the development height limits within the Glenpanel precinct of the TPLM Variation Area need to be considered in regard to an increase in height.
24. The historic values associated with the immediate setting of Glenpanel Homestead must be preserved by ensuring an appropriate building

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<sup>1</sup> Joint Witness Statement, Slope Hill Outstanding Natural Feature, 18 October 2023 – Figure 2

<sup>2</sup> Schedule 21.22.6 Slope Hill PA ONF Schedule of Landscape Values (rebuttal version), 3 October 2023



setback along with the retention of existing mature vegetation within an identified area of the homestead. In my view, the TPLM Variation provisions (including policies requiring high quality building and site design – 49.2.7.9) will ensure the increased development height can be absorbed into the Glenpanel Precinct without adversely affecting the historic values associated with Glenpanel Homestead.

25. Following that, the potential effect of this increased height needs to be considered in views of the Slope Hill ONF. In most views this increase in height will be seen in the context of the urban development throughout Ladies Mile anticipated under the Variation, which will be to a height of 24.5m, including to the immediate east of the Glenpanel Precinct.
26. The Submitter also seeks to remove provisions that protect existing vegetation from removal on private land within the TPLM Variation Area. While sympathetic to some of the reasoning, I do not support this approach in full, and instead suggest a process that ensures existing established vegetation within the TPLM Variation Area is assessed, and is protected subject to its health, location and significance. It is important to note that while existing vegetation may be appropriate in the current rural setting, the TPLM Variation will result in relatively intensely developed urban area, one in which existing ‘rural’ trees do not always ‘fit’.

### **Landscape Character and Amenity Values**

27. In general, I agree with the ‘description of the landscape’ for the wider TPLM Variation zone set out in Mr Skelton’s report<sup>3</sup>. However, I make the following additional comments.

### Receiving Environment

28. This has been covered extensively in the TPLM Variation proposal, reporting, and Council evidence to date. Essentially the TPLM Variation seeks to change the TPLM Area (and any extension to it) from a predominantly rural area to an urban area. If developed as per the master plan, this will be an intensive urbanised transport corridor.

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<sup>3</sup> Evidence in Chief – Stephen Skelton, pages 5 – 7.

29. The TPLM Variation Area is located between the foot of Slope Hill, the edge of Lake Hayes, the urban areas of Lake Hayes Estate, Shotover Country and the Queenstown Country Club, and the Shotover River Terraces. The Slope Hill ONF overlay covers the adjacent Slope Hill, with the edge of the overlay abutting the northern boundary of the TPLM Variation Area. As part of the TPLM Variation, the UGB has been shifted to encompass the TPLM Variation Area and now abuts the ONF overlay of Slope Hill. These cross through the GDL property as shown (yellow line) below.

#### Homestead Precinct Landscape Concept



Figure One: Glenpanel Precinct

#### Slope Hill ONF and the Glenpanel Site

30. I agree that the rebuttal version of 21.22.6 PA ONF Slope Hill is largely appropriate at the scale of the Slope Hill ONF as a whole, subject to the recommended change in the use of the 'no' landscape capacity rating terminology to '**extremely limited or no**' landscape capacity rating agreed between the planning and landscape experts, at the conferencing session on 3 October 2023.

31. Having reviewed the various evidence written for the process, I agree with Ms Smetham when she states, *‘While I understand that the Slope Hill ONF landscape values are deemed to be a ‘starting point’, it is critical that they are relevant and key to identifying why this landscape is an ONF because it is against these values that any future development proposal must be assessed’*<sup>4</sup>.
32. Slope Hill is a grazed pastoral landscape, with the resulting landcover reinforcing the legibility of the landform which displays a higher degree of naturalness and openness in the upper slopes. The lower slopes are a more intensively managed pastoral landscape with signs of human presence, including on the Glenpanel site. On which, the openness is more contained by farm tracks, fences, water races, and vegetation around the gully (noting there are two other gullies on this southern face that display similar characteristics).
33. Therefore, I believe that the consideration of context where within the lower flanks/ foothills of the Slope Hill ONF activities that integrate with, and complement/enhance existing land uses, provide for a transition between urban development of the adjacent flats and are located to integrate with natural landscape elements are possible, while still maintaining the values of the ONF.<sup>5</sup>
34. Additionally, while reference to landscape restoration and enhancement is made within 21.22.6 Slope Hill PA ONF, there is no acknowledgement that mitigation, offsets or benefits to landscape arising from a proposal may alter the capacity of the landscape to absorb a development in a way that ONL values remain intact.
35. The Glenpanel Site generally displays a greater degree of modification, relatively typical of the lower slopes and at the toe of the hill. Further many of these modifications are less visible when viewed at greater distances; or, in relation to views from SH6, are obscured by vegetation on or alongside the boundary of the state highway (depending on the viewing location).
36. Because of these visibility and physical characteristics, both physically and visually this ‘blurs’ the reading of the underlying landform and leads to a

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<sup>4</sup> Evidence in Chief – Ms Nicola Smetham for Milstead Trust, dated 11 September 2023, at [18]

<sup>5</sup> OS139.68 Grant Stalker Family Trust Submission

transition area, in which the Glenpanel Site sits, between the more valued upper slopes and the more varied in character, lower slopes of Slope Hill.

37. I have read the evidence of Mr Mark Tylden for GDL and note his comments in relation to the existing arbitrary boundary of the Slope Hill ONF and the GDL site. *‘That ONF boundary currently sits across the GDL site at an arbitrary location, which does not tie to any particular contour or feature. It does not align with the toe of the slope, although that “toe of the slope” terminology is thrown around. The ONF boundary is also unfairly imposed on the GDL site, as it dips lower on the GDL site than the properties either side, and further around the ONF. In other areas of Slope Hill, the ONF line rises to avoid existing dwellings, or to follow man-made features, such as water races. In other words, it does not faithfully follow the “feature”, let alone reflect what is outstanding in respect of the feature.’*<sup>6</sup>
38. While I am of the opinion the existing Slope Hill PA ONF boundary is generally appropriate, at the micro scale I generally agree with Mr Tylden. Furthermore, clear views of the lower parts of the southern slopes of Slope Hill are currently difficult to discern, and in the context of the development that will be enabled by the TPLM Variation will be obscured even further.
39. In my opinion this places the protection of those physical values, that are identified in the *‘Particularly important views to and from the area’* in 21.22.6 PA ONF Slope Hill, associated with the mid to upper slopes ONF as even more important. I also note, as addressed further below, that further information has come to light as to the boundary of the roche moutonnée feature, as per the New Zealand Geopreservation Inventory.

### **Issues raised by Submission (Submitter 73) relevant to my expertise**

#### A. Urban Growth Boundary

40. GDL wishes to develop a property within their ownership located at 429 Frankton-Ladies Mile Highway (the development site). The lower portion of the property is located within the TPLM Variation Area and includes both the Medium Density residential (MDR) Precinct and the Glenpanel Precinct overlays. The upper part of the property is located within the Slope Hill ONF overlay.

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<sup>6</sup> Evidence in Chief, Mr Mark Tylden – GDL, dated 20 October 2023 at [15].

41. GDL seeks to extend the UGB up to the 423m contour within the ONF overlay. I understand there are precedents for this in the region with the UGB on Peninsula Hill extending halfway up that ONL, and that it was located there to enable water tanks or other infrastructure to service the Jack's Point development if need be. It must be noted that the Submitter does not seek to shift the ONF boundary itself to match the proposed UGB line, as has been requested by other submitters on the TPLM Variation (although the submitter does seek a relatively small zone extension at the toe of the slope and the shift of the ONF to match that extension; I am not certain that the zoning needs to extend and the ONF boundary be amended in that location, but that may make more sense from a planning perspective).
42. The purpose of shifting the UGB to the extent proposed is to create a consenting pathway for the future development on this part of the Glenpanel site for two reasons. First, is for necessary infrastructure (specifically water tanks) to be placed on the lower slopes of Slope Hill. As I understand, water tanks are considered urban development under the Proposed District Plan and Mr Murray discusses this further in his evidence. Second, this will provide, if necessary, for a small zone extension to allow urban development beyond the current Slope Hill ONF boundary associated with the Glenpanel Precinct and as shown in Figure One previously. I address this further below.
43. From a landscape and visual amenity perspective, the issue whether or not the UGB can be extended while still protecting the key values of Slope Hill from inappropriate development. As I understand it, this is more of a planning question, as to the consequences of the UGB being extended but the ONF still remaining. I understand that while the UGB shift will allow some urban development to be considered, such as the water tanks, the ONF objectives and policies will still need to be met, together with the underlying zoning. On this basis, and as I have considered what the submitter wishes to undertake, I am comfortable with the extension of the UGB from a landscape perspective.

Proposed infrastructure and the Glenpanel Precinct extension

44. This is described in the JWS (*refer Attachment A*) and in regard to the water tanks as set out in more detail in Attachment B to this evidence. Further to that the location of three water tanks is shown in Figure Two below.



*Figure Two: Proposed Water Tanks*

45. I also note that the preliminary location of the planned reservoir infrastructure associated with the TPLM Variation is also located within the Slope Hill ONF as detailed in the Candor<sup>3</sup> three waters infrastructure report prepared for QLDC for the TPLM Variation, as shown in Figure Three below.



Figure 7.5 – Preliminary location for the proposed Ladies Mile reservoirs.

Figure Three: Preliminary location for the proposed Ladies Mile reservoirs illustrated within the Candor 3 waters infrastructure report for the TPLM Variation.

#### Capacity to absorb development

46. Regarding absorption of change an analysis is typically based on judgements about sensitivity of landscape characteristics and values most likely to be affected. Therefore, in this case I suggest it is the sensitivity of physical, sensory and associative aspects which influence the overall landscape character that should primarily be considered when assessing the magnitude of landscape character and visual amenity effects in regard to the existing character of the Glenpanel site and the Slope Hill ONF.
47. Regarding landscape capacity, and the receiving environment, landscape capacity is the amount of change that a landscape can accommodate without substantially altering or compromising its existing character or values. It must be remembered that capacity will more than likely vary according to the type and nature of change being proposed. In this case we are essentially considering a change of landscape character on the Glenpanel site that is perceived to be influenced by immediate surrounding character. In addition, the Glenpanel site should also be seen in the context of the TPLM Variation which will essentially result in an urbanised corridor.

48. As outlined in the JWS and set out above, in my opinion that while the Slope Hill ONF is relatively small in scale the shared and recognised values associated with it vary across it. The Glenpanel site within the lowermost southern slopes of Slope Hill ONF, physically and visually differs from the seemingly undeveloped distinctive and highly legible upper slopes. Therefore, it is important to understand that these differences require careful consideration in regard to the GDL Submission.
49. I consider that there exists an opportunity for future development within the Glenpanel site to reinforce and complement the landscape setting without compromising the key landscape values identified. In summary, these include the following:
- a. Locating the proposed water tanks adjacent to existing farm buildings and the existing vegetated gully;
  - b. Reinforcing the quality of the gully and the opportunity to establish indigenous habitats and ecosystems within it;
  - c. Keeping the visible slopes largely free of buildings and restoring natural character to a site that has been highly modified in terms of landcover. The gully provides a positive opportunity for further modification, by way of restoring previous vegetation communities and therefore natural character; and
  - d. Limit any future built form to the toe of the slope and in the area of the Glenpanel Precinct. This presents an opportunity for a logical and realistic extension of the UGB, and this is the context within which this part of the Glenpanel site sits and the opportunity that it presents by way of direct connection and proximity.
50. I am of the opinion that GDL's proposed UGB extension, allowing for limited urban development in the form of water tanks on the mid-slope, and limited mixed use development within an extension of the TPLM Zone slightly up the slope (if necessary with an adjustment to the ONF boundary), in association with the TPLM Variations provisions relating to site design and views, takes into account the Glenpanel site's landscape sensitivity and visual influence. In this location it is a response to the potential opportunities and constraints, based on the landscape values and an



understanding of the key differences within the Slope Hill ONF as well as the new urban development that is anticipated by the TPLM Variation.

Potential landscape effects of the shift in location of the UGB

51. Attachment B sets out an assessment of the potential landscape and visual amenity effects arising from siting the water tanks on the Glenpanel site on Slope Hill ONF. I refer you to that. The assessment, which is also relevant to the shift in location of the UGB, focuses on the following potential issues:
  - a. Effects on values of Slope Hill ONF
  - b. Effects on visual amenity as experienced from SH6 and wider receiving environment
52. Landscape effects will derive from changes to the Slope Hill ONF values arising from the introduction of built development associated with urban land use, and land modification that would be required for this. Within the Glenpanel site, the lower slope of the ONF, particularly toward the toe of the slope, already has a notable degree of modification in the form of a building, tracks, water races, fence lines and exotic vegetation.
53. My understanding of the Slope Hill PA ONF Landscape Schedule is that the key landscape values to be protected are those associated with the upper slopes. I also note that the key PDP policy in relation to ONFs requires the protection of landscape values. I consider that the proposed change to the UGB, for the limited development as outlined, would protect the overall key landscape values of Slope Hill ONF.
54. Visibility of future development on the toe of Slope Hill on the Glenpanel site will be limited to an extent. The new urban development, up to 24.5m in height in places, anticipated by the TPLM Variation may screen the lowermost slopes of Slope Hill ONF. While I acknowledge that visibility of the feature is just one aspect of the landscape values associated with Slope Hill ONF, it is an important one as outlined in the Slope Hill PA ONF Landscape Schedule.
55. In my opinion the limited spatial extent of future development on the Glenpanel site, would not detract from the Slope Hill ONF landscape values for the following reasons:

- a. The landscape values associated with the Glenpanel site at the toe of Slope Hill differ from those shared and recognised values of the upper slopes. The key values of legibility and expressiveness associated with Slope Hill ONF would remain intact, maintaining the integrity of the naturally occurring landform;
- b. The level of modification and containment at the toe of Slope Hill ONF in this location presents an opportunity for the Glenpanel site to successfully absorb the scale and form of development anticipated. Future built development will be very limited and will remain subservient to the overall natural landscape elements, patterns and processes associated with Slope Hill ONF. In this context, I consider effects on the landscape values of Slope Hill ONF will be low - moderate;
- c. The Glenpanel site on Slope Hill ONF will sit immediately behind urban development anticipated by the TPLM Variation. Therefore, future limited development (if of a suitable scale and carefully sited on the Glenpanel site) will be 'tucked behind' the intensive urbanised TPLM Variation Area and at the foot of Slope Hill ONF and therefore can be visually absorbed or contained.
- d. Visibility of future development enabled by the proposed UGB extension from SH6 will be limited. While future development will be potentially visible from limited places, in my opinion it will not detract from the shared and recognised visual amenity values associated with Slope Hill ONF and the wider landscape and experienced by the public on SH6. Further to this the development enabled by the TPLM Variation will result in SH6 essentially becoming an urban environment and therefore development within the proposed UGB extension will also be viewed in this context.
- e. In light of policies 27.3.24.4, 49.5.41.4(c) and 49.2.7.9 of the TPLM Variation, along with the limited spatial extent of potential future development associated with the Glenpanel Precinct (*refer Figure One*) I consider that assurance will be provided that future development within the proposed UGB extension on the Glenpanel site will be located and designed in such a way that it appropriately responds to the existing and future landscape context.

- f. The proposed shift of the UGB boundary, will give effect to the provisions of Chapter 4 of the PDP and in particular Objective 4.2.2 B *“Urban development within Urban Growth Boundaries that maintains and enhances the environment and rural amenity and protects Outstanding Natural Landscapes and Outstanding Natural Features, and areas supporting significant indigenous flora and fauna”*<sup>7</sup>, and its supporting policies. This in effect will give consideration to the protection of Slope Hill ONF values and any future development creep.
56. Overall, in my opinion the UGB (and limited urban development) can overlap the Slope Hill PA ONF in this location, without compromising its key landscape values. However, if this is not the case, I also consider that a finer grain assessment of the ONF boundary may determine a more appropriate boundary, with the extension of the TPLM zone to meet that boundary.
57. Ms Gilbert at [48 – 52] states her reliance on the mapping of Slope Hill ONF, confirms her agreement with this and further records that *‘all of the mapped extent corresponds to the roche moutonnée glacial landform feature’*<sup>8</sup> I certainly acknowledge the feature is recognised in the NZ Geopreservation Inventory for the reasons listed by Ms Gilbert at [51]. However, it is also my understanding, inclusion within the inventory is not sufficient for identification as an ONF and further technical assessment is required.
58. I do not know who has undertaken the technical assessment for Slope Hill ONF, and if, in fact, one has been. I also understand it is not uncommon that if a feature is suitable as an ONF it likely would not be the entire feature as mapped on the inventory and ONF status (if suitable) would be more niche.
59. Interestingly I have undertaken a mapping investigation exercise using the geo mapping tool on the New Zealand Geopreservation Inventory site, as shown in Figure Four below. Figure Five illustrates the current alignment of Slope Hill ONF boundary. It is interesting to note the difference between the two, particularly in regard to the Glenpanel site. I agree that geomorphological boundaries are a desirable first preference for

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<sup>7</sup> PDP – Part 2 – Urban Development, 4-5.

<sup>8</sup> EIC Ms Gilbert at [51]

determining ONF/ONL boundaries<sup>9</sup> and therefore acknowledge such an assessment would require the input of other experts (geologists, ecologists etc).



*Figure Four: Slope Hill as per New Zealand Geopreservation Inventory site*



*Figure Five: Slope Hill as mapped – QLDC PDP Slope Hill ONF*

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<sup>9</sup> [2019] NZEnvC 160 Hawthenden Farms and others v Queenstown Lakes District Council (*Topic 2.1 Decision*): [80].

B. Building Height Limits within the Glenpanel Precinct

60. GDL also seeks to increase the height limit within the Glenpanel Precinct from the current 8m to 17m, in order to accommodate for the floor to ceiling heights of commercial land uses and the potential for 4-storey apartments. The main concerns with this proposal are as follows:

- Potential adverse effects on the receiving environment – in particular the Slope Hill ONF.
- Potential adverse effects on the historic values of Glenpanel homestead.

The potential adverse effects are discussed, and suggestions are made below.

Potential landscape and visual amenity effects of increased height limits on the Slope Hill ONF

61. The Glenpanel Precinct has limited visibility from outside the TPLM Variation Area This is largely due to the backdrop of Slope Hill and the presence of existing mature vegetation within the precinct and on ladies Mile terrace in general. As the TPLM Variation area undergoes anticipated urban development, the foreground will develop an urban visual character with the presence of built form of various heights. The proposed HDR precinct adjacent to the eastern boundary of the Glenpanel Precinct anticipates building heights of up to 24.5m. The MDR Precinct adjacent to the southern and western boundaries of the Glenpanel Precinct anticipate building heights of up to 13m.

62. In the context of these anticipated building heights, along with the proposed TPLM Variation policies relevant to landscape and visual amenity matters, built form of up to 17m high within the Glenpanel Precinct would not create noticeable contrast within its anticipated surroundings, and therefore it is deemed it will not adversely impact on Slope Hill ONF.

Potential landscape and visual effects of increased building heights to the heritage values of Glenpanel Homestead

*Visibility and containment within TPLM*

63. Glenpanel Homestead will only be visible within the TPLM Variation Area due to the proposed surrounding development heights being higher than the height of the Glenpanel Homestead itself, as well as the presence of mature vegetation and vegetated buffers from the state highway. Given the anticipated change in land use, Glenpanel Homestead and its immediate surrounds will become less visible due to the introduction of built form, urban elements and finer grain of the future surrounding residential areas.
64. Due to the above, any potential landscape and visual amenity effects of the future Glenpanel Precinct development on the historic values associated with the Glenpanel Homestead will remain confined to within the TPLM Variation Area. All further discussion is focused on the values as perceived from within the TPLM Variation area.
65. I draw on the expertise of Mr Robin Miller and his assessment of the heritage values of the Glenpanel Homestead in my consideration of potential landscape and visual amenity effects resulting from an increase in building height within the Glenpanel Precinct on these values.
66. Mr Miller summarises the Origin Assessment<sup>10</sup> of Glenpanel Homestead as stating that *“the heritage values of the buildings are tied to their setting within the rural/open landscape”*<sup>11</sup>. The origin assessment also stated that the contextual heritage values associated with the Glenpanel Homestead that could be impacted by development included the following:
- a) *Viewshafts, looking towards and away from the heritage features;*
  - b) *The contextual value and historic associations/connections between the buildings; and*
  - c) *The broader idyllic, open and rural setting and context of the study area, which are representable of the historic and agricultural use of the land*<sup>12</sup>.

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<sup>10</sup> Origin Consultants' report titled 'Ladies Mile Master Plan: Heritage and Archaeological Values Assessment,' dated January 2022

<sup>11</sup> Evidence of Mr Robin Alexander Keith Miller – Heritage, 29 September 2023. Page 5

<sup>12</sup> Evidence of Mr Robin Alexander Keith Miller – Heritage, 29 September 2023. Page 5

67. Mr Miller acknowledges that the evaluation, concerns, and suggestions outlined in the Origin Assessment were determined prior to the creation of the TPLM Variation Master Plan. He therefore focuses his assessment more specifically on the appropriate controls for the protection of the historic values of Glenpanel Homestead in the context of proposed surrounding development, as well as the development of the Glenpanel Precinct.
68. As I understand, Mr Miller's primary concern is that while the PDP provides specific controls such as maximum height and site coverage, it lacks a process that ensures visual cohesive and sympathetically designed development within the Glenpanel Precinct and lacks a focus on heritage values. He also expresses a concern that the adjacent MDR and HRD precincts could result in the '*Glenpanel Homestead to be subsumed by development*'<sup>13</sup>.
69. In my opinion, in the context of the TPLM Variation, the historic values ascribed to the wider setting of the Glenpanel Homestead will be highly altered due to the anticipated development of Ladies Mile as a result of the TPLM Variation. Therefore, it is the historic values ascribed to the immediate setting of the Glenpanel Homestead that will be most sensitive to any increase in building height.
70. The attributes of the immediate setting that contribute to its historic value can be summarised as follows:
- Openness within the homestead's immediate setting;
  - Presence of mature vegetation;
  - Visual contrast of homestead (painted white) against natural backdrop of hill slope and mature vegetation; and
  - Absence of other significant buildings in close proximity to homestead.
71. I consider the above attributes, can be protected while allowing for less restrictive maximum building heights within the Glenpanel Precinct.

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<sup>13</sup> Evidence of Mr Robin Alexander Keith Miller – Heritage, 29 September 2023.

72. As part of our previous work for GDL, RMM carried out a spatial planning and modelling exercise (*refer Figure Six below*) as well as the preparation of a landscape development plan for the Glenpanel Precinct. This was undertaken in conjunction with Saddleback and DCM Urban who focused on the urban design of this area. Built form explored varied between 11m and 17m in height, and the location of this included setbacks that protected the established open space surrounds of Glenpanel Homestead (*refer Figure One*).
73. In terms of limiting potential effects arising from an increase in building height, spatial separation of the proposed buildings from the homestead, along with the retention of the mature exotic vegetation and open space that is associated with Glenpanel Homestead's immediate setting is the key outcome sought. Together this will provide an appropriate containment for the historic homestead to remain visually legible within its context and retain the attributes (*paragraph 70 above*) that significantly contribute to its heritage values.



Figure Six: Model depicting GDL proposed built form with 17m height plane overlays, within the Glenpanel Precinct.

74. In my opinion, it is not only the height of potential development but more so the proximity of the proposed development to the homestead that would have greater impact on the heritage values associated with the homestead and its setting. In summary I believe that the Glenpanel Precinct can absorb an increase of maximum building height from 8m to 17m without



visually adversely effecting the historic homestead for the following reasons and as per the following recommendations:

- a. The highest buildings are located to the east of the Glenpanel Precinct, where it adjoins the HDR Precinct, which anticipates built form of up to 24.5m in height. This placement of the higher built form creates a logical transition between the two precincts, without visually overwhelming the historic homestead;
- b. A minimum building setback of 100m to the west and 80m to the east of the Glenpanel Homestead is maintained;
- c. Existing mature vegetation within the setback (as per b. above) of Glenpanel homestead is assessed; and 1) all healthy existing trees are maintained, and 2) a Glenpanel precinct landscape master plan including a vegetation succession plan is prepared for the immediate setting of the homestead; and
- d. Further to policy 49.2.7.9, consideration is given to additional provisions for the assessment of any proposed development for visual cohesion and its effect on the historic values of Glenpanel Homestead.

75. I agree with the key points of Mr Miller's report in that certain provisions need to be made in order to ensure all future development within the Glenpanel Precinct needs to be sympathetic to the historic homestead. Anticipated built form, as prescribed in TPLM variation and TPLM Masterplan, will be a noticeable contrast between the ascribed maximum 8m building height of Glenpanel Precinct and the anticipated maximum building height of 24.5m in the adjacent HDR precinct.

76. The suggested maximum 17m height, when placed appropriately, will create a more balanced transition between the outer edges of the Glenpanel precinct and the surrounding MDR and HDR precincts. In my opinion the historic values associated with the immediate setting of Glenpanel Homestead can be protected.

C. Protection of Existing Vegetation

77. GDL seeks to remove the requirement of the TPLM Variation to retain all existing vegetation on private land, on the grounds that some of this vegetation is not in good health and it is not viable to keep the trees in the

long term, particularly in the urban environment anticipated by the TPLM Variation.

78. While in partial agreement to the first part of their statement, I do not support the suggestion to remove the provision in its entirety from the TPLM Variation. Mature vegetation present within the TPLM Variation Area, and where appropriate can continue to inform the visual character and amenity of the TPLM Variation area. Having been involved in several plan changes, I also understand the difficulties presented by the desire to retain vegetation 'en masse' in the context of the existing amenity it affords, particularly when that character is proposed to change from rural to intensely urban.
79. While some of the vegetation may be in decline, the uncontrolled removal of this vegetation has the potential to result in adverse effects on the amenity and heritage values of the receiving environment. Therefore in my opinion the assessment, protection, and succession management of the existing established vegetation is, in my view, the most logical way to ensure existing key vegetation is retained in a practical way that can contribute to the future setting of the TPLM Variation area.

#### **Council section 42A report and Council's expert evidence**

80. In her evidence, Ms Gilbert expresses her concern over moving the UGB into the Slope Hill ONF as an enabler to urban development creeping up the slopes, and therefore blurring the current defendable edge. In her views, this threatens the values of the Slope Hill ONF, leaving it vulnerable to inappropriate development and loss of the attributes that ensure its current classification as an ONF.
81. I believe I have addressed these concerns in the body of my evidence, and these have also been canvassed in the JWS following expert conferencing with Ms Gilbert and Mr Compton – Moen. I acknowledge there is a fundamental difference in opinion on the extent of potential effects arising from a shift of the UGB to overlay the Slope Hill ONF on the Glenpanel site. This may primarily be because of a different understanding of the planning consequences of having the UGB co-exist over the ONF, as it does with the Peninsular Hill ONL at Jacks Point.

82. While the evidence of Mr Skelton does not address the GDL Submission specifically, he opines that the Slope Hill ONF boundary as shown on the QLDC PDP maps is appropriately located in relation to the toe of Slope Hill in this location. I have covered these issues above, but I agree with Mr Skelton's comments in relation to the containment of landscape and visual effects arising from the TPLM Variation.
83. I also note Mr Skelton's position in regard to 21.22.12 Western Whakatipu Basin PA ONL, and the potential for urban expansion in this location being appropriate from a landscape perspective. So it does not seem cut and dry that there can never be any urban expansion into an ONL or ONF.

#### **Matters raised by other Submitters.**

84. As I understand there have been no submissions received specifically raising concerns about the GDL submission. There have been a number of submissions lodged on the TPLM Variation that comment on matters relevant to landscape, visual effects and rezoning. While none of these relate directly to the GDL site, by inference key matters raised in relation to rural character, urban creep, design that should complement the environment and landscape and visual effects on the environment in a way relate to the proposed extension. I consider I have address these in the body of this evidence.

#### **Conclusions**

85. I consider the proposed UGB extension, associated development plans, and suggested provisions appropriately address the Glenpanel site's attributes, sensitivity, and the surrounding environment.
86. While the TPLM Variation currently avoids the new Zone encroaching into the Slope Hill PA ONF, the Variation will introduce urban development directly adjacent to the ONF and consequently the ONF will read as sitting behind an urban corridor. Potentially this will compromise any shared and recognised values associated with the toe on the southern side of the Slope Hill PA ONF, due to this area being obscured in most views. This is in the context of the identified high legibility and expressiveness values of the Slope Hill ONF deriving from the visibility of this feature that enable a clear understanding of the landscape's formative processes.

87. Overall, the a shift in the UGB boundary will provide a pathway for future development that I consider is appropriate and contiguous with the TPLM Variation as notified and will not result in significant adverse landscape or visual amenity effects that cannot be either avoided or mitigated on the key landscape values of Slope Hill ONF. Of course, if a different more intensive application for consent were later to be sought, I would not have the same opinion, and would likely not expect it to get consent (although that would have to be assessed at the time).

**25 October 2023**

**Tony Douglas Milne**

**APPENDIX A – Joint Witness Statement**

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE  
QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991 (RMA)  
**IN THE MATTER** of the Te Pūtahi Ladies Mile Plan Variation in accordance  
with section 80B and 80C, and Part 5 of Schedule 1 of the  
Resource Management Act 1991.

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**JOINT STATEMENT OF LANDSCAPE EXPERTS IN RELATION TO SLOPE  
HILL OUTSTANDING NATURAL FEATURE**

**DATED 18 OCTOBER 2023**

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PO Box 323 QUEENSTOWN 9348  
Tel +64 3 379 7622  
Fax +64 3 379 2467

**WYNN WILLIAMS**

Solicitor: L F de Latour | K H Woods  
([lucy.delatour@wynnwilliams.co.nz](mailto:lucy.delatour@wynnwilliams.co.nz) |  
[kate.woods@wynnwilliams.co.nz](mailto:kate.woods@wynnwilliams.co.nz))

## **INTRODUCTION**

- 1 This joint witness statement (**JWS**) records the outcome of conferencing of landscape expert witnesses in relation to the Slope Hill Outstanding Natural Feature (**Slope Hill ONF**).
- 2 The expert conferencing was held on 18 October 2023, via a video conference.
- 3 Attendees at the conference were:
  - (a) Bridget Gilbert for Queenstown Lakes District Council. Bridget Gilbert is the author of a statement of evidence dated 29 September 2023 which addressed landscape issues in relation to the Slope Hill ONF.
  - (b) Tony Milne, a landscape expert, on behalf of Glenpanel Development Limited (submitter 73) and Milstead Trust (submitter 108).
  - (c) David Compton-Moen, a landscape expert, on behalf of Glenpanel Development Limited (submitter 73) and Milstead Trust (submitter 108).

## **CODE OF CONDUCT**

- 4 This JWS is prepared in accordance with sections 9.4 to 9.6 of the Environment Court Practice Note 2023.
- 5 We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

## **KEY INFORMATION SOURCES RELIED ON**

- 6 The following material has been reviewed by and/or relied upon by all attendees when coming to our opinions:
  - (a) The TPLM Variation (and associated documents);
  - (b) The landscape evidence of Bridget Gilbert on behalf of QLDC), dated 29 September 2023;

- (c) The landscape evidence of Stephen Skelton (on behalf of QLDC), dated 29 September 2023;
  - (d) The relevant parts of the Section 42A Report as it touches on Slopehill ONF (**s42A Report**);
  - (e) Schedule 21.22.6 Slope Hill PA ONF Schedule of Landscape Values (notified version);
  - (f) Slope Hill PA ONF mapping;
  - (g) 21.22.6 Slope Hill PA ONF Joint Witness Statement, dated 4 October 2023;
  - (h) The PDP Decisions Version ONF/L mapping (Landscape Classification mapping);
  - (i) QLDC PDP Chapter 3 – Strategic Direction;
  - (j) QLDC PDP Chapter 4 Urban Development;
  - (k) QLDC PDP Chapter 2 Definitions;
  - (l) Te Tangi a te Manu (**TTatM**, Aotearoa New Zealand Landscape Assessment Guidelines).
- 7 The key facts and assumptions we have agreed on when coming to our opinions are as follows:
- (a) Mr Milne advised that the proposed water tanks are to be located as shown in **Figure 1** below. It is our understanding there will be three tanks of 1,000m<sup>3</sup> in capacity. The tanks will be 15m diameter x 6m high. The tanks are to be sited on the west side of the gully with a base level of 414 masl with a batter slope of 1V:1.5H to the north (uphill) and bunding of a similar gradient to the south (downhill). We understand slope gradients are subject to advice by a Geotechnical Engineer. A grassed/gravel access track is also required to provide access to the tanks for maintenance<sup>1</sup>.

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<sup>1</sup> Flints Park Fresh Lodgement Stage One – RMM Landscape and Visual Assessment – dated 8 September 2023.



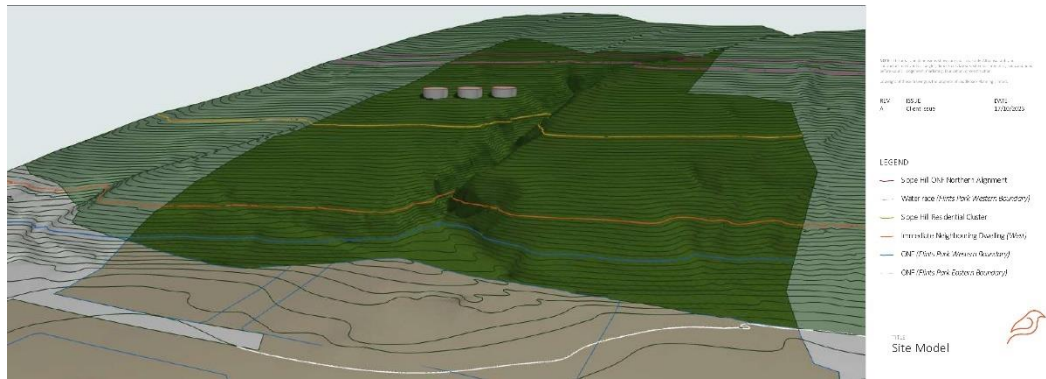


Figure 1 - Image showing the potential location of water tanks within the ONF (provided by Saddleback)

- (b) The scale and character of urban development anticipated in RMMLA Concept Plan is for a Homestead Precinct that is a distinct neighbourhood in its own right that focuses on a transformed Glenpanel Homestead. It is anticipated that it would comprise four development (sub precinct) areas:
- i. The Glenpanel Homestead and grounds;
  - ii. Medium Density Residential (MDR) to the west of the homestead featuring additional height;
  - iii. Additional MDR against the toe of Slope Hill, and;
  - iv. A mixed-use Local Centre to the east of the homestead.
- (c) These respective components are anticipated to deliver sufficient residential density to support a well-functioning and vibrant local centre. This is shown in **Figure 2** below.

## Homestead Precinct Landscape Concept



Figure 2: Indicative Homestead Precinct Landscape Plan (green dashed-dot line corresponds to PDP Decisions Version ONF boundary and the 21.22.6 Slope Hill PA ONF boundary)

- (d) Development recognises the historical features of the Homestead site including the - Homestead dwelling, cottage, and grounds. It is understood the Homestead dwelling will be repurposed for community or commercial activity, such as a café, so that it becomes a focal point for the neighbourhood, the wider development and district.
- (e) The Homestead grounds will become a versatile space, generally available for public use, including an open lawn, terraces, maintained gardens, playground, and trail network with linear access east-west across the toe of Slope Hill. The concept will maintain the existing mature planting which will be complemented by further planting to enhance the grounds and increase the ecological qualities of the site. A mix of apartments retail, and commercial buildings are proposed to create this precinct with buildings typically ranging in height from 8m to 13m.

**PURPOSE AND SCOPE OF CONFERENCING**


- 8 The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement in relation to landscape issues relating to the Slope Hill ONF relevant to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**).
- 9 Conferencing covered all matters on a preliminary agenda which had been circulated to the experts in advance of the conferencing.
- 10 **Attachment A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.

Dated: **18 October 2023**



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**Bridget Gilbert**



**Tony Milne**



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**David Compton-Moen**

## ATTACHMENT A – EXPERT CONFERENCING ON SLOPEHILL OUTSTANDING NATURAL FEATURE

Participants: **Bridget Gilbert (BG), Tony Milne (TM), David Compton-Moen (DCM).**

Issue	Agreed Position	Disagreements or reservations, with reasons
<p><b>Landscape values of Slope Hill ONF (including reference to Slope Hill Priority Area ONF Schedule of Landscape Values)</b></p>	<p>The experts agree:</p> <p>[a] The experts agree that the rebuttal version of 21.22.6 PA ONF Slope Hill is largely appropriate at the scale of the Slope Hill ONF as a whole, subject to the recommended change the use of the ‘no’ landscape capacity rating terminology to ‘extremely limited or no’ landscape capacity rating agreed between the planning and landscape experts, at the conferencing session on 3 October.</p> <p>[b] Infrastructure associated telecommunications, the Queenstown Airport along with farming activities, including farm tracks, fence lines, water races, and a farm shed are located within the ONF. Many of these modifications are less visible when viewed at greater distances; or, in relation to views from SH6, are obscured by vegetation on or alongside the boundary of the state highway (depending on the viewing location).</p> <p>[c] Urban development throughout Ladies Mile anticipated under the Variation is likely to obscure views of parts of the lower margins of the landform feature in views from SH6 and parts of the Ladies Mile flats. This is expected to include parts of the lower margins of the roche moutonnee landform that coincide with the Glenpanelsite.</p> <p>[d] The stream gully (supporting both exotic and some native vegetation) is an important and easily recognisable physical</p>	<p>In respect of the Glenpanel Site, <b>Messrs Milne and Compton-Moen</b> consider:</p> <ol style="list-style-type: none"> <li>1) The Glenpanel Site generally displays a greater degree of modification, relatively typical of the lower slopes and at the toe of the hill.</li> <li>2) In regard to openness, the mid to upper slopes portray an open character with limited built form noticeable. This openness is currently enhanced by the existing pastoral vegetation cover, although regarding the Glenpanel Site the openness is more contained by farm tracks, fences, water races, and vegetation around the gully (noting there are two other gullies on this southern face that display similar characteristics).</li> <li>3) Because of the visibility and physical characteristics described in [b] and [c], both physically and visually this ‘blurs’ the reading of the underlying landform and leads to a transition area, in which the Glenpanel Site sits, between the more valued upper slopes and the more varied in character, lower slopes of Slope Hill.</li> <li>4) <b>Ms Gilbert</b> considers that while there are vegetated gullies, shelter belts, tracks and scattered trees across the lower southern flanks of the roche moutonnée (including outside the Glenpanel site), these are interspersed with appreciable areas of open and uncluttered, steep pastoral slopes. Ms Gilbert</li> </ol>

Issue	Agreed Position	Disagreements or reservations, with reasons
	<p>hydrological feature on the slope of the Glenpanel Site. The indigenous gully planting reinforces the legibility and expressiveness values of the gully, in association with the two vegetated gullies to the east of the Glenpanel site on the south side of Slope Hill.</p>	<p>considers that this patterning establishes a strong impression of landscape coherence across the southern side of the roche moutonnée.</p> <p>5) Further, Ms Gilbert considers that the geomorphology (including the topographical patterning) of the roche moutonnée forms a distinctive contrast with the planar landscape associated with the Ladies Mile flats at the base of the landform, that is highly legible and is highly expressive of the formative glacial processes.</p> <p>6) Collectively, these characteristics mean that Ms Gilbert does not agree that there is: a blurring of the landscape feature boundary across the Glenpanel site; a differentiation in landscape values between the upper and lower flanks of the southern side of Slope Hill; or a 'transitional landscape' along the toe of the landform feature in the vicinity of the Glenpanel site.</p>
<p><b>Is the Slope Hill ONF boundary correct?</b></p>	<p>[e] The experts agree that the water tanks may be able to be absorbed on the site assuming:</p> <ul style="list-style-type: none"> <li>• They are located to optimise the integrating influence of the more complex localised landscape patterning associated with the vegetated gully on the Glenpanel site.</li> <li>• They are positioned so that they can be accessed via the existing farm track network (thus avoiding the need to cut a new track across the south side of the roche moutonnée).</li> </ul>	<p>7) <b>Messrs Milne and Compton Moen</b> consider that the existing Slope Hill PA ONF boundary is generally appropriate. It is their view that the UGB (and limited urban development) can overlap the Slope Hill PA ONF in this location, without compromising its key landscape values. However, if this is not the case, they consider that a finer grain assessment of the ONF boundary may determine a more appropriate boundary. Such an assessment would require the input of other experts (geologists, ecologists etc).</p> <p>8) Relying on her field work, review of Geology mapping, the Topic 2 Decisions and Dr Marion Read reports for the PDP Stage 1, and her landscape evaluation as part of the PA</p>

Issue	Agreed Position	Disagreements or reservations, with reasons
	<ul style="list-style-type: none"> <li>• The tanks are positioned to be at least partially buried (where practicable) and finished in a visually recessive colour.</li> <li>• The tanks are mitigated via: localised naturalised landform modification that is designed to marry in the with surrounding slope profiles; and/or indigenous restoration planting that is configured to integrate with the existing gully planting patterning (and thus form a cohesive and coordinated landscape element that reinforces the underlying topographical patterning).</li> </ul> <p>[f] The experts acknowledge that the ‘success’ of such measures in ensuring the water tanks sit comfortably into the RMA s6(b) ONF landscape setting would however need to be tested via a detailed landscape assessment.</p> <p>[g] In their opinion, it is not uncommon that infrastructure of this nature needs to be located within ONF/Ls in the district. This is due to the following:</p> <ul style="list-style-type: none"> <li>• the fact that approximately 97% of the district is ONF/L;</li> <li>• such infrastructure tends to have quite specific operational and functional needs; and</li> <li>• there is often ‘nowhere else to go’ for such infrastructure.</li> </ul> <p>[h] The experts agree that from a landscape perspective, they do not consider that water tanks in their own right, read as urban development.</p>	<p>Schedules and Wakatipu Basin Land Use Planning Study, Ms <b>Gilbert</b> agrees with the Decisions Version of the Slope Hill PA ONF mapping along the south side of the roche moutonnée.</p>

Issue	Agreed Position	Disagreements or reservations, with reasons
<p><b>What are the effects of water tanks at that location?</b></p>		<p>9) <b>Messrs Milne and Compton-Moen</b> consider that the potential landscape effects are on the values of the Slope Hill PA ONF. These include the following:</p> <ul style="list-style-type: none"> <li>i. A 'very low' level loss of openness.</li> <li>ii. A 'very low' level loss of naturalness. However, a high perception of naturalness (that arises from the dominance of natural landscape elements and patterns at Slope Hill) will remain.</li> <li>iii. The built form of the water tanks remains subservient to the natural form of Slope Hill.</li> </ul> <p>10) Potential effects on visual amenity as experienced from the highway and the wider receiving environment. These include:</p> <ul style="list-style-type: none"> <li>i. the water tanks will be either not seen or barely noticeable in views of Slope Hill from a distance (for example the Remarkables Ski Field Road, SH6 adjacent to Lake Hayes) due to distance, topography, vegetation, and the coverall context of the viewing environment. They will have no impact on the broader ONL mountain context in these views.</li> <li>ii. The water tanks will be seen in views from immediately opposite the Glenpanel Site (eg. Howards Drive). In these views a sense of openness will be diminished, albeit the tanks will be seen in association with the adjacent gully planting. These views will also change markedly with the TPLM Variation, and the tanks will be viewed in the context of the TPLM Variation and</li> </ul>

Issue	Agreed Position	Disagreements or reservations, with reasons
		<p>they will be seen in the context of what will be an urbanised, rapid transport corridor.</p> <p>11) Ms Gilbert has not assessed the landscape effects of this aspect of the Variation and will address this in her rebuttal evidence (if required).</p>
<p><b>Effects of developing the proposed TPLM Variation area as notified on the Slope Hill ONF, including on the Glenpanel site</b></p>		<p>12) <b>Messrs Milne and Compton-Moen</b> consider that while the TPLM Variation avoids encroaching into the Slope Hill PA ONF, the Variation will introduce urban development directly adjacent to the ONF and consequently the ONF will read as sitting behind an urban corridor. Potentially this will compromise any shared and recognised values associated with the toe on the southern side of the Slope Hill PA ONF, due to this area being obscured in most views. This is in the context of the identified high legibility and expressiveness values of the Slope Hill ONF deriving from the visibility of this feature that enable a clear understanding of the landscape's formative processes.</p> <p>13) In their view, the TPLM Variation provisions (including policies requiring high quality building and site design, and those that support visual links to Slope Hill) assist in limiting adverse impact on Slope Hill ONF.</p> <p>14) The anticipated urban development throughout Ladies Mile will obscure views of the lower margins of the landform feature, therefore part of the Glenpanel Site, adjacent to Ladies Mile. Therefore, this places the protection of those physical values, that are identified in the <i>'Particularly important views to and</i></p>



Issue	Agreed Position	Disagreements or reservations, with reasons
		<p><i>from the area' in 21.22.6 PA ONF Slope Hill, associated with the mid to upper slopes ONF even more important.</i></p> <p>15) <b>Ms Gilbert</b> disagrees with this analysis.</p> <p>16) In her view Messrs Milne and Compton-Moen have placed an overemphasis on visual amenity effects rather than the broad range of landscape effects (which is not consistent with landscape assessment best practise as guided by TTatM).</p> <p>17) In her view, the loss of visibility to parts of the lower slopes contemplated by the Variation does not diminish the landscape values of those parts of the feature that will be obscured from view by intervening built form (or diminish the landscape values of the feature in its entirety).</p> <p>18) Further, Ms Gilbert considers that Messrs Milne and Compton-Moen have overlooked the fact that in a district in which approximately 97% of the land area is classified as either ONL or ONF, it is inevitable that urban development will be juxtaposed against outstanding natural features and landscapes (to be protected under s6(b) RMA) in places.</p> <p>19) In her view, the fact that this long-established spatial relationship between urban development and ONFs (and ONLs) in the district (as outlined in (ii) above), has not, to date, resulted in the down grading of adjacent s6(b) RMA landscapes or features is, (in her view), evidence that the 'downgrading' of landscape values of the part of the ONF adjacent the Variation area inferred by Messrs Milne and Compton-Moen is incorrect.</p>

Issue	Agreed Position	Disagreements or reservations, with reasons
<p><b>Whether the lower slopes of what is currently shown as ONF on the Glenpanel site have capacity to absorb urban development such as that as shown in the plan “Homestead Precinct Landscape Concept”.</b></p>		<p>20) <b>Messrs Milne and Compton-Moen</b> consider that, for the same reasons as outlined above, urban development can be absorbed in the ONF.</p> <p>21) Further to that, the urban development shown will be located at the immediate toe of the Slope Hill ONF and adjacent to the Glenpanel Homestead and its current setting that includes trees of heights not that dissimilar to the height of proposed built form. It is considered there is a greater capacity on the toe of the slope which is already roughly within the curtilage of the existing Homestead and is surrounding by mature plantings. In their opinion, future built form will be screened by existing or proposed mitigation planting and/or where existing vegetation within the gullies and around the Homestead can assist to anchor built form.</p> <p>22) Development as shown will be ‘tucked behind’ the intensive urbanised TPLM Variation Area and at the foot of Slope Hill ONF and therefore will be visually absorbed or contained. In their view, potential built form at the toe of the slope should of a scale and carefully sited to ensure it can be absorbed.</p> <p>23) <b>Ms Gilbert</b> disagrees. In her view, the idea of enabling urban development within the ONF is fundamentally at odds with the PDP policy approach of protecting the landscape values of ONFs. This is because introducing urban development in part of the ONF will inevitably mean that the area in and around the (new) urban development will fail to qualify as ONF due to:</p> <ul style="list-style-type: none"> <li>i. the scale and extent of landform modification that would be required for the area to be developed for urban land uses; and</li> </ul>

Issue	Agreed Position	Disagreements or reservations, with reasons
		<p>ii. the marked change in the level and character of built development associated with urban land use.</p> <p>24) Ms Gilbert also notes that such a strategy would not align with the requirement to protect landscape values of ONFs when locating UGBs or extending towns and rural urban settlements through plan changes (PDP 4.2.1.5).</p>
<p><b>What are the effects of such urban development in that area?</b></p>		<p>25) <b>Messrs Milne and Compton-Moen</b> consider that such development would be acceptable from a landscape perspective.</p> <p>26) The development shown on the “Homestead Precinct Landscape Concept Plan” will be in an area that is not as visually accessible. Currently it is generally obscured by vegetation and in the future will be by urban development.</p> <p>27) The development as shown respects the heritage values associated with the Glenpanel Homestead.</p> <p>28) <b>Ms Gilbert</b> disagrees. While she acknowledges that such development may be developed in a manner that is sympathetic to the heritage values of the Glenpanel homestead, she considers that the extent of landform modification (for example, approximately 5m earthwork cuts) and scale of built form anticipated by the “Homestead Precinct Landscape Concept Plan” will not protect the physical and perceptual values of the Slope Hill ONF.</p>

## APPENDIX B – Visual Assessment of Infrastructure on Slope Hill

*The following visual effects assessment has been extracted from a full landscape and visual amenity report prepared for GDL Flints Park Stage One application to the EPA.*

### Assessment of Visibility and Effects on Visual Amenity

1. In undertaking an assessment of the proposal on visual amenity, viewpoints representative of the views most likely to be important are identified and form the basis of this assessment. The main viewpoints selected include elevated views overlooking the Wakatipu Basin, views from the District's main roads, public viewpoints of importance and views in close proximity to the application site.
2. The following assessment from these viewpoints focuses on the water tanks as a cumulative effect to the balance of the GDL's future proposal site.

### **Viewpoint 1**



*Figure 2: Viewpoint 1 from the Remarkables Ski Field Access Road*

3. Viewpoint 1 is taken from the Remarkables Ski Field Access Road, looking in a northerly direction, approximately 2.7 km from the application site. Refer to Sheet 18 of the GA, Appendix B.
4. I previously assessed the effects as follows:
5. *The development on the flat will appear urban in scale and density and will read as an extension of the existing urban built form to the south of the highway, increasing in height and density onto the toe of the hill. Given the distance from the viewer and the small scale of the site in the context of a*

*complex scene the degree of change is considered to be low, and not adverse.*

6. *Regarding visual amenity effects, there will be a minor loss of visual openness on the flat land at the base of Slope Hill and along the toe of the hill, however, the proposed scale of built form is generally consistent with the vision anticipated by the Ladies Mile Masterplan Report and would not be unexpected in the context of the existing development to the south.*
7. Focusing on the Water Tanks, as the only element of the proposal on the ONF (effectively as a cumulative effect to the balance of any future proposal), in my opinion, the tanks are likely to be visible from this location, on the west side of the gully just below the existing barn. Considering the proximity of the tanks to the gully they may be partly screened by vegetation in the gully. Paired with bunding and colour selection, it is likely that the tanks will not be highly noticeable.

## **Viewpoint 2**



*Figure 3: Viewpoint 2 from Hawthorne Drive to the east of Frankton Airport*

8. Viewpoint 2 is taken from Hawthorne Drive to the east of Frankton Airport, looking in a north-easterly direction, approximately 2.2 km from the application site.
9. I previously assessed the effects as follows:
10. *As visibility of the lower site is largely obscured by vegetation, the proposed built form on the flat is unlikely to be visible, with the exception of some third storeys and roof lines which may be visible between gaps in the existing vegetation and on the toe of Slope Hill. To the extent that the built form might be visible (including if the vegetation were removed), it will constitute a similar clustering of dense built form as is visible on the terraces of Shotover Country, with a somewhat noticeable increase in density and building heights toward and on the toe of the hill. The proposed*

*new homestead will be visible but will read as a building within a farming landscape. The magnitude of change in this context will be low.*

11. In regard to visual amenity effects, the existing dwellings of Shotover Country appear densely concentrated across three levels of terracing; the proposed development will read as a fourth terrace of development which will not appear out of place given the current pattern of settlement. Proposed planting within the subdivision will take several years to reach a mature height at which time this will visually further soften the built form and help to settle it into the landscape. Regarding potential adverse effects, the development on the flat will contribute to a slight loss of openness along the base of Slope Hill while otherwise integrating seamlessly with the existing visual environment. The new homestead, while it will be visible, will integrate with and reinforce the ongoing farming values of Slope Hill. Overall, any adverse effects will be low.
  
12. Focusing on the Water Tanks, as the only element of GDL's Proposal on the ONF (effectively as a cumulative effect to the balance of GDL's Proposal), in my opinion, the proposed tanks will be difficult to discern in the current scene. When the proposed colour and bunding are considered, it is likely that the tanks will be barely noticeable when viewed from this location.

### **Viewpoint 3**



*Figure 4: Viewpoint 3 from Lake Hayes Pavilion car park*

13. Viewpoint 3 is taken from the Lake Hayes Pavilion car park, looking in a westerly direction, approximately 2.6 km from the application site.
  
14. I previously assessed the effects as follows:
  
15. *Given the distance from the site and the presence of significant mature vegetation near the lake edge, the proposed development on the flat will not be visible from this viewpoint. Should this vegetation be removed in the*

*future, the proposal is still unlikely to be visible given the retention of the shelterbelt along the site's east boundary. Again, overall, adverse effects are considered to be low.*

16. The New Homestead is not part of the current Flint's Park Stage 1 Proposal, and so is removed from the equation.
17. My opinion however in respect of the water tanks is that as visibility of the proposed location for the tanks is obscured by vegetation, they will not be seen from this viewpoint.

#### **Viewpoint 4**



*Figure 5: Viewpoint 4 from State Highway 6 approximately 3.7 km east of the site*

18. Viewpoint 4 is taken from State Highway 6, looking in a westerly direction, approximately 3.7 km from the development site.
19. I previously assessed the effects as follows:
20. *Given the distance from the site and the presence of significant mature vegetation, the proposed development on the flat will not be visible from this viewpoint. Should this vegetation be removed in the future, the proposal is still unlikely to be visible given the intended retention of the shelterbelt along the site's east boundary. Again, while the new homestead may be visible, it will be viewed as part of the farming landscape. It will also be viewed with a backdrop of trees along the gully and Ferry Hill in the distance, which will further soften the presence of the built form. Overall, any adverse visual effects are considered to be low.*
21. The New Homestead is not part of the current proposal, and so is removed from the equation.
22. My opinion however in respect of the water tanks is that given the distance from the site and the presence of vegetation, the proposed tanks will not be visible from this viewpoint.

## Viewpoint 5



Figure 6: Viewpoint 5 from Howards Drive adjacent to Queenstown Country Club

23. Viewpoint 5 is taken from Howards Drive along the east boundary of the Queenstown Country Club SHA, looking in a north-westerly direction, approximately 350 m from the application site. Refer to Sheet 20 of the GA, Appendix B.
24. I previously assessed the effects as follows:
25. *Within the Te Pūtahi Ladies Mile Masterplan Report and illustrative masterplan, the east shelterbelt has been given a protected status to ensure the trees are retained. This will provide short-term mitigation for the proposal but in the longer-term, will be subjugated by planned more-intensive urban development in the foreground. Given the mature size of the trees and the proposed buildings height envelopes I consider it unlikely that the internal built form of the proposed development will be visible above the top of the shelterbelt from this viewpoint. In the short term, the planting and bunding along the highway edge will remain, evolving in the future with Ladies Mile and the highway corridor. In the interim, this planted and bunded edge will likely preclude visibility of the adjacent built form on the flat. While the new homestead will be visible, the overall degree of change in this view will be low, and any adverse visual effects will be low, with only a small portion of the development will be visible from this viewpoint.*
26. The New Homestead is not part of the proposal, and so is removed from the equation.
27. My opinion however in respect of the water tanks is that the location of the proposed tanks is partially obscured by landform and vegetation in the current scene, and it is likely that the tanks will continue to be screened from this viewpoint. However seasonal changes in leaf cover may allow for partial visibility of the tanks in winter. When the proposed colour and



bunding are considered, it is likely that the tanks will not be highly noticeable when viewed from this location.

### Viewpoint 6



Figure 7: Viewpoint 6 from State Highway 6 path in front of Queenstown Country Club

28. Viewpoint 6 is taken from the south side of State Highway 6, bordering the Queenstown Country Club SHA, approximately 30 m from the application site and looking in a westerly direction.
29. I previously assessed the effects as follows:
30. *Regarding visual effects, I consider the change to be largely in keeping with the vision outlined in the Te Pūtahi Ladies Mile Masterplan Report. The setback from the highway and transitional landscape edge will evolve with Ladies Mile. The built form itself will be somewhat higher in density than existing built form to the south of the highway, but again is in keeping with the Masterplan Report vision.*
31. *In respect of the water tanks, given this viewing angle and location, future foreground development including the transitional landscape edge will obscure views of the proposed tanks.*

### Visual Effects Summary

32. To summarise, while the placement of the proposed water tanks will change the visual character of Ladies Mile, this change is in keeping with what is anticipated by the TPLM Variation, building on the Ladies Mile Structure Plan (ref) and the anticipated infrastructure associated with the development of TPLM . Visual effects are confined by distance, topography and are seen in the context of the evolving environment that surrounds the

site. The proposed infrastructure uphill of the Glenpanel Precinct can be visually absorbed by Ladies Mile.

33. The future built form, including street and open space planting within Stage One will be viewed as part of a wider anticipated comprehensive development of Te Pūtahi Ladies Mile. Overall visual effects are considered to be either none to low at most, including of the proposed water tanks.

**APPENDIX C – Graphic Attachment**



# Document Information

<b>Project</b>
Glenpanel Development Limited Submission on the TPLM Variation
<b>Address</b>
429 Frankton-Ladies Mile Highway, Lake Hayes
<b>Client</b>
Glenpanel LP
<b>Document</b>
Graphic Attachment to Glenpanel Development Limited Submission on the TPLM Variation
<b>Status</b>
Draft for Review
<b>Revision</b>
0 25/10/2023
<b>Prepared By</b>
Rough Milne Mitchell Landscape Architects Ltd
Project Number: 21318
Author: Sophie Harrison
Peer Reviewed: Tony Milne

## Disclaimer



These plans and drawings have been produced as a result of information provided by the client and/or sourced by or provided to Rough Milne Mitchell Landscape Architects Limited (RMM) by a third party for the purposes of providing the services. No responsibility is taken by RMM for any liability or action arising from any incomplete or inaccurate information provided to RMM (whether from the client or a third party). These plans and drawings are provided to the client for the benefit and use by the client and for the purpose for which it is intended.

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# Context - Wakatipu Basin

## Legend

	Flint's Park Site Boundary
	Ladies Mile Extent

Source: Te Pūtahi Ladies Mile Draft Masterplan Report



# Planning Context - Operative District Plan (ODP)

## Legend

Flint's Park Site Boundary

Source: QLDC Operative District Plan

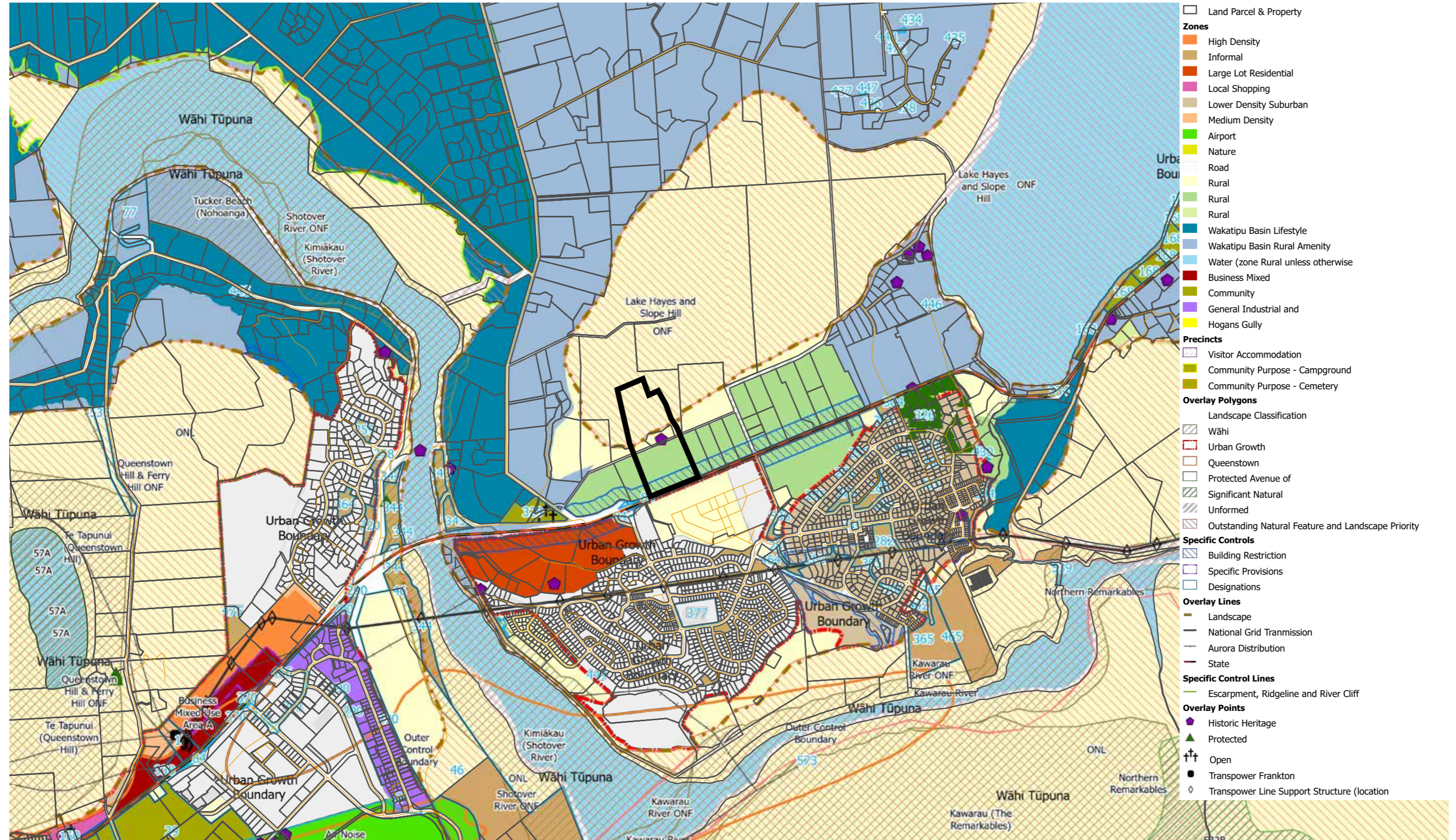


# Planning Context - Proposed District Plan (PDP)

## Legend

 Flint's Park Site Boundary

Source: QLDC Proposed District Plan



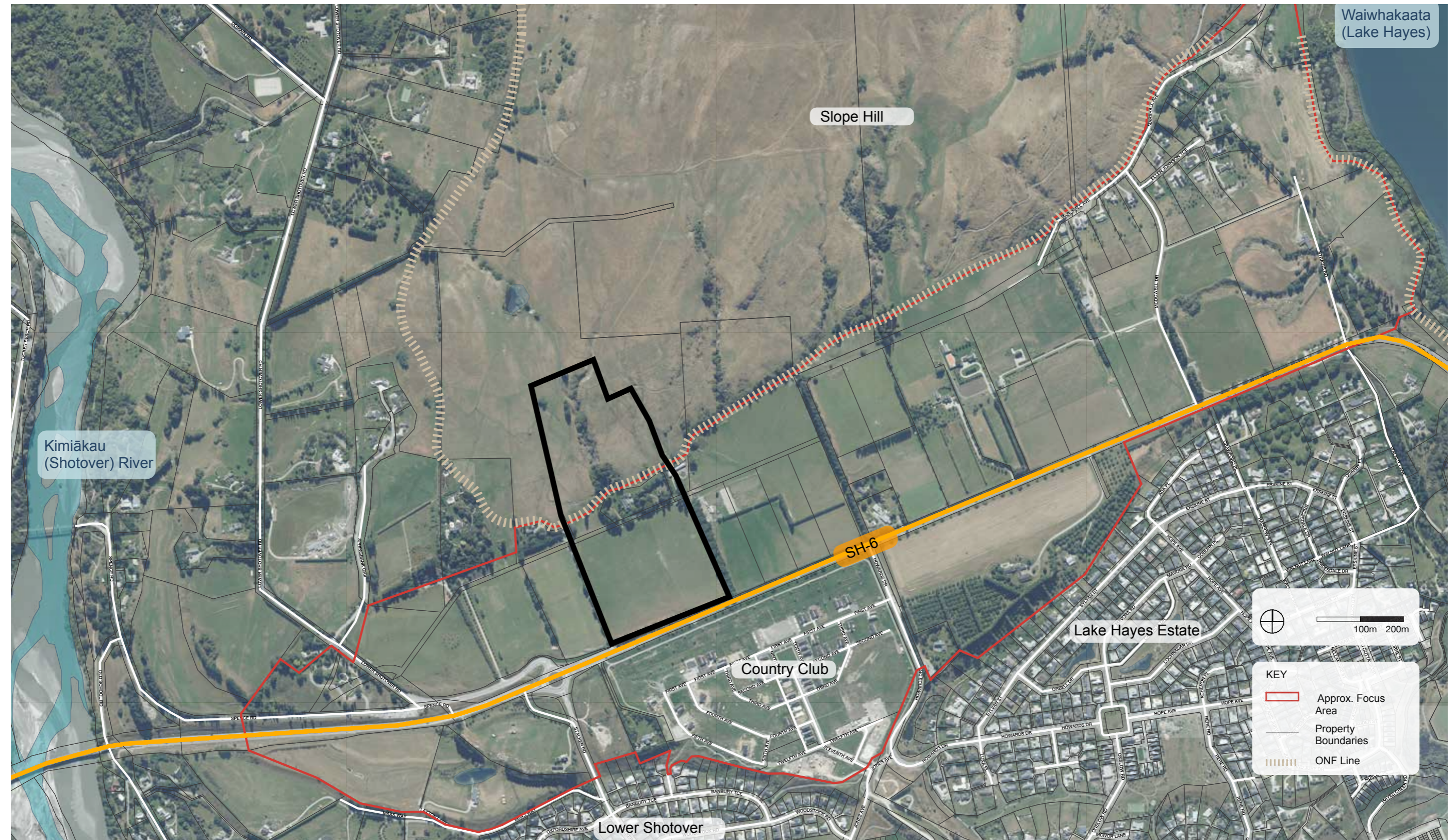


# Context - Ladies Mile

## Legend





	Flint's Park Site Boundary
	Ladies Mile Extent

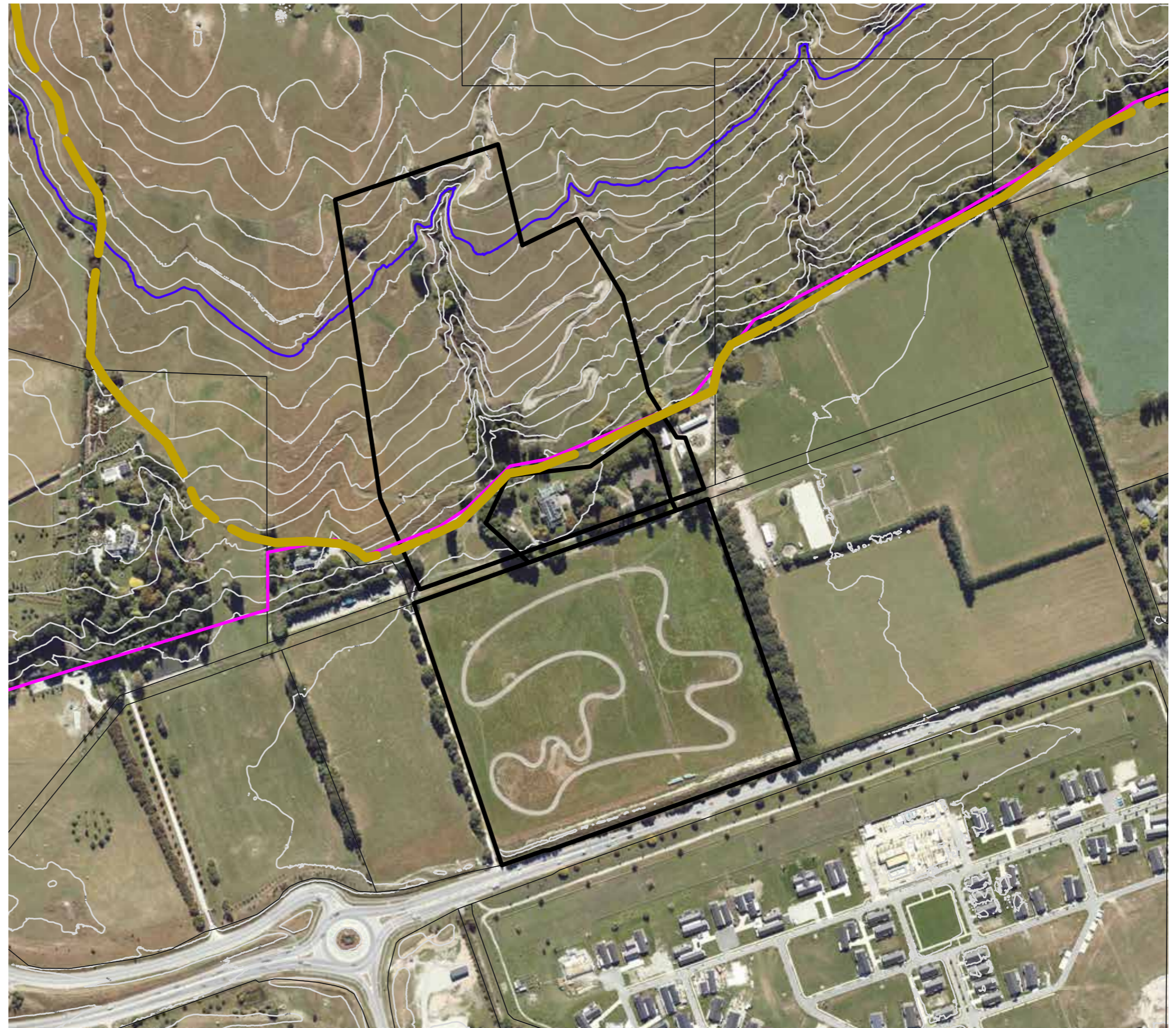
Source: Te Pūtahi Ladies Mile Draft Masterplan Report



# Proposed UGB Location








## Legend

	Flint's Park Site Boundary
	Ladies Mile Extent
	ONF Boundary
	423m Contour



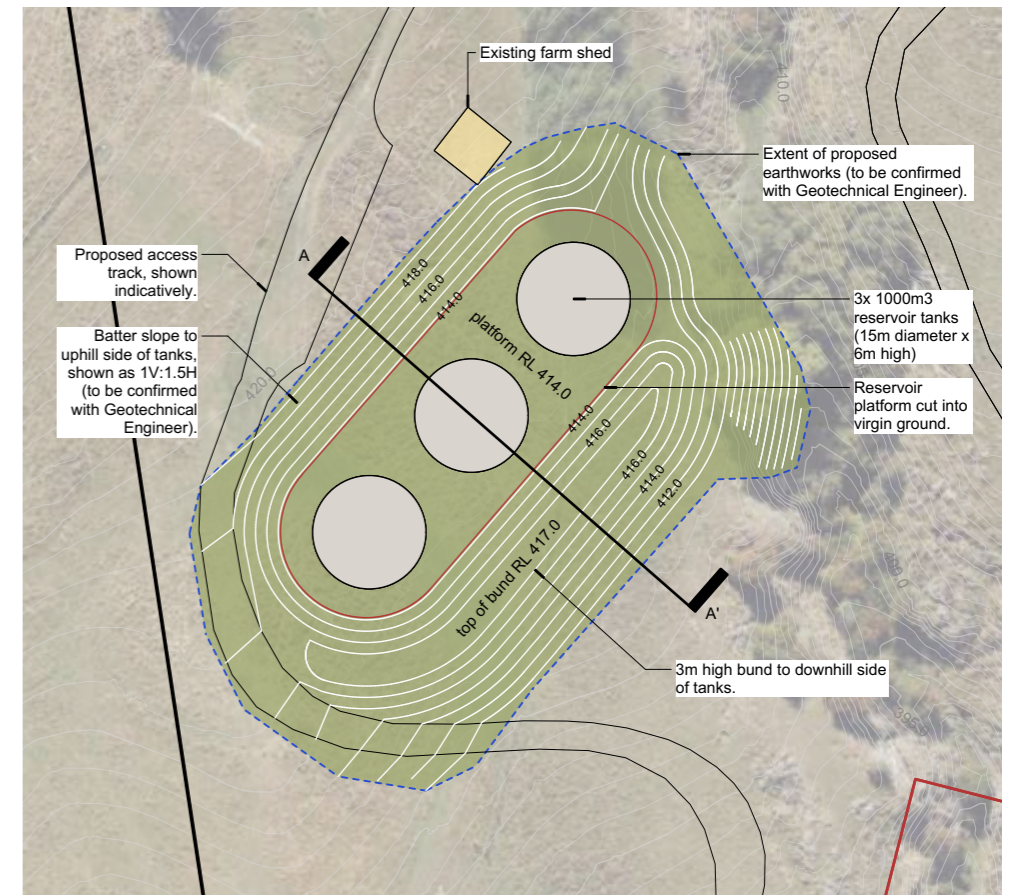
Scale 1:4,000 @ A3  
Contour Interval 5m

# Reservoir Tanks

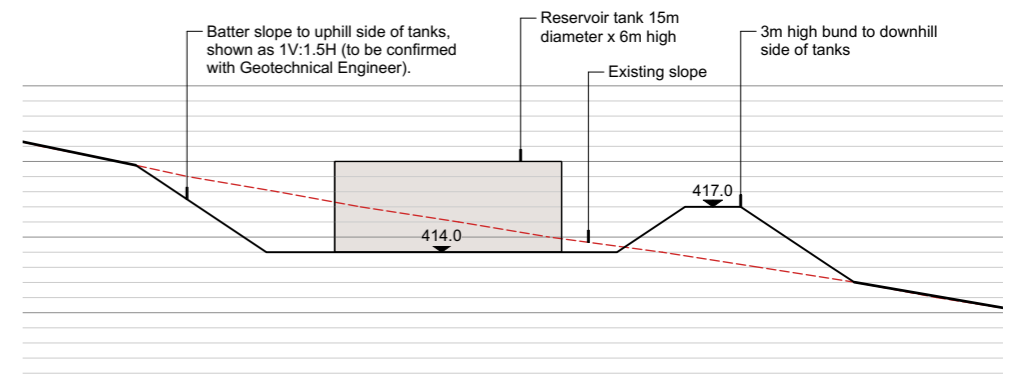
Legend	
	Site Boundary
	ONF Overlay
	Proposed Parcels
	Reservoir Tanks
	Existing farm barn
	Proposed Earthworks area
	Proposed 1m Contours



**Reservoir Tanks Location Plan**  
Scale 1:3000 @ A3



**Enlargement Plan**  
Scale 1:1000 @ A3



**Cross Section A-A'**  
Scale 1:500 @ A3



Scale as shown @ A3

Source: Land Information New Zealand (parcel boundaries)

Southern Horizon Surveying (contours)

QLDC GIS Online (aerial & ONF Line)

# Homestead Precinct Landscape Concept







Legend	
	Roads and Car Parking
	Concrete Paths
	Gravel Paths & Driveway
	Patio Pavers
	Existing Flagstone Paving - To be repurposed
	Timber Bridge
	Buildings (Indicative)
	Grassed Area
	Main Lawn
	Garden Beds
	Native Revegetation
	Riparian Revegetation
	Hedge
	Existing Trees - To be Retained
	Proposed Trees
	Existing Water Tanks
	Garden Arch/Trellis
	Existing Boundaries
	Proposed Boundaries
	Existing Water Race
	Gully Flow Path
	QLDC ONF Line



Scale 1:1000@A3

# Viewpoint Photo Locations

Legend	
	Site Boundary
	Parcel Lines
	ONF Overlay
	LVA Photo Location



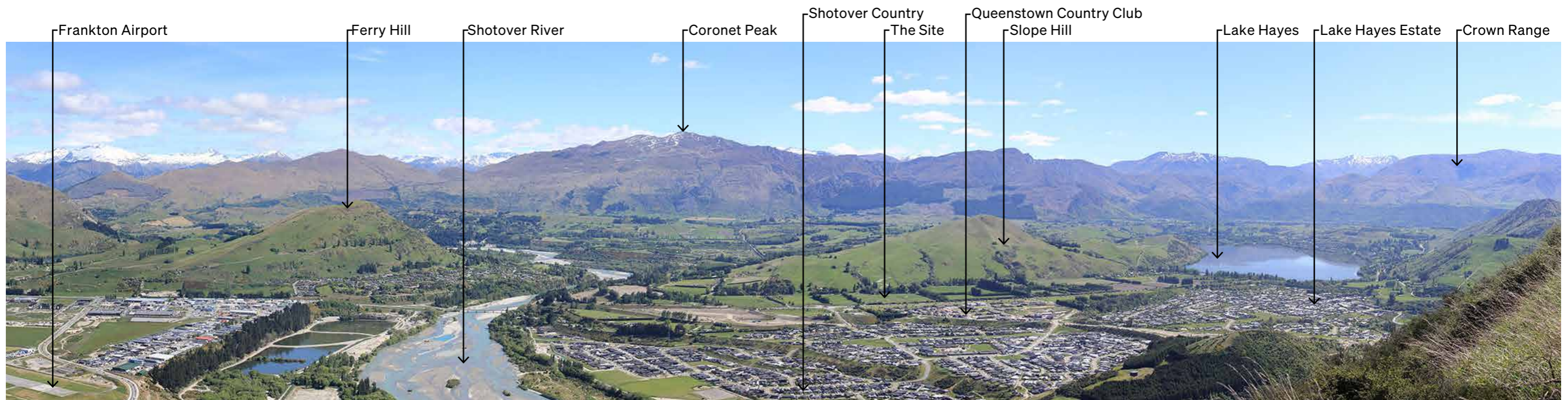
Scale 1:25,000 @ A3

Source: Land Information New Zealand  
(aerial & parcel boundaries)

Southern Horizon Surveying  
(LiDAR Contours)

QLDC GIS Online  
(ONF Line)

# Viewpoint 1



Viewpoint Photograph 1: From the Remarkables Ski Field Access Road (looking north)

Photograph Information:  
Date of Photography: 8 November 2021  
Camera: Canon EOS 550D  
Print Size: A3

# Viewpoint 2

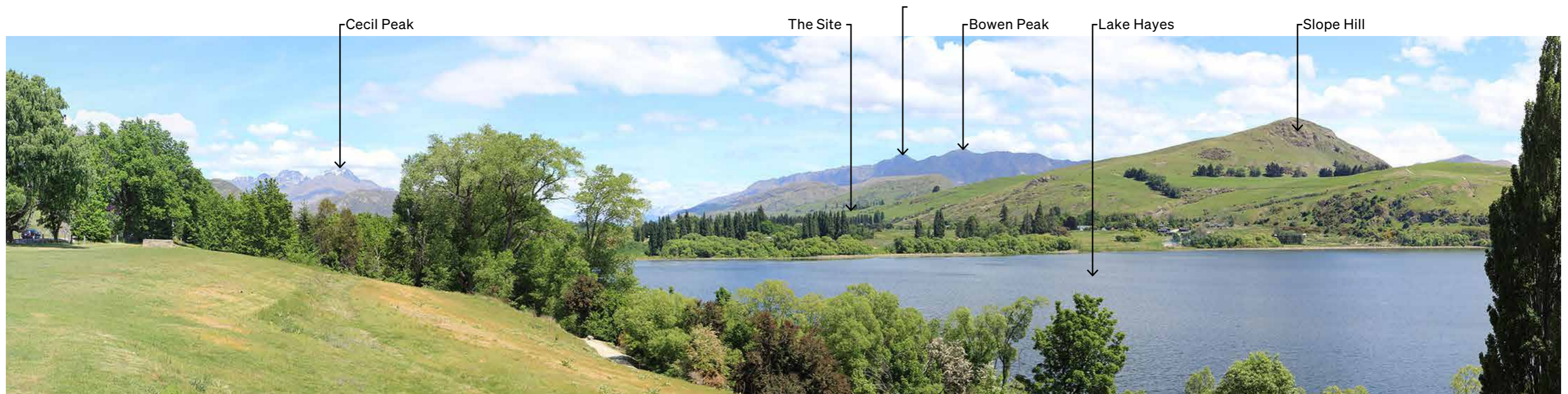


Viewpoint Photograph 2: From Hawthorne Drive to the east of Frankton Airport (looking north-east)

Photograph Information:  
Date of Photography: 8 November 2021  
Camera: Canon EOS 550D  
Print Size: A3

# Viewpoint 3

Ben Lomond Peak



Viewpoint Photograph 3: From the Lake Hayes Pavilion car park (looking west)

Photograph Information:  
Date of Photography: 8 November 2021  
Camera: Canon EOS 550D  
Print Size: A3



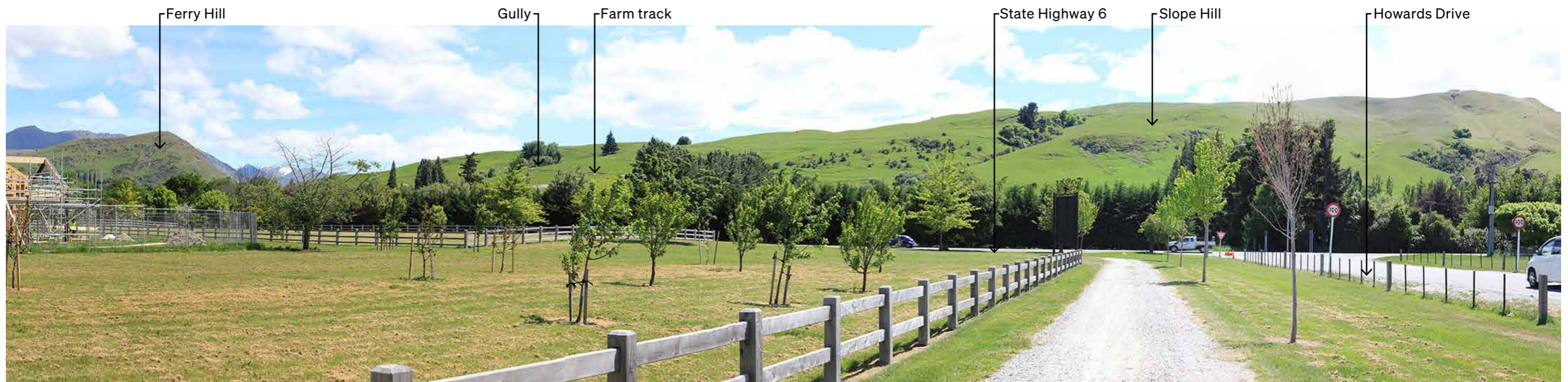
# Viewpoint 4



Viewpoint Photograph 4: From State Highway 6 approximately east of the site (looking west)

Photograph Information:  
Date of Photography: 8 November 2021  
Camera: Canon EOS 550D  
Print Size: A3

# Viewpoint 5



Viewpoint Photograph 5: From Howards Drive adjacent to the Queenstown Country Club (looking north-west)

Photograph Information:  
Date of Photography: 8 November 2021  
Camera: Canon EOS 550D  
Print Size: A3

# Viewpoint 6



Viewpoint Photograph 6: From State Highway 6 across from the site at its south-east corner (looking north-west)

Photograph Information:  
Date of Photography: 27 January 2022  
Camera: Olympus OM-D E-M10 Mark II  
Print Size: A3

ROUGH MILNE MITCHELL  
LANDSCAPE ARCHITECTS

**Christchurch**  
Level Two, 69 Cambridge Terrace  
Christchurch 8013  
PO Box 3764 Christchurch 8140

info@rmmla.co.nz  
+64 3 366 3268

**Auckland**  
Level Two, 139 Victoria Street West  
Auckland CBD, Auckland 1010

info@rmmla.co.nz

**Dunedin**  
42 Stuart Street, Dunedin 9054

info@rmmla.co.nz  
+64 3 477 2030

**Wānaka**  
Level One, 24 Dungarvon Street,  
Wānaka 9305  
PO Box 349, Wānaka 9343

info@rmmla.co.nz  
+64 3 974 7940

**RMM**

rmmla.co.nz