

BarnHill Corporate Trustee Ltd



STAGE 3B EVIDENCE

Debbie MacColl | Bunn Family | 29 May 2020

INTRODUCTION

1. My name is Debbie MacColl and I am one member of the Bunn family. I am a director of BarnHill Corporate Trustee Ltd (BHCT), Barn Hill Ltd and the Arrowtown Lifestyle Retirement Village. I hold the qualifications of Bachelor of Education from Otago University.
2. I have been farming in the Wakatipu Basin for forty years. I currently lease the Family Farm at Morven Ferry Road in partnership with my brother Phillip Bunn.
3. My planning knowledge has been gained by submitting on The QLDC District Plan processes from 1990s. I have submitted and attended numerous hearings as an individual, also as part of the Bunn Family through D E Bunn and Co and BHCT.

SCOPE OF EVIDENCE

4. This evidence is to assist the hearings panel on Submission 31035 on the proposed District plan (PDP). This evidence is in relation to the Rural Visitor Zone (RVZ) area adjacent to Morven Ferry Road and the Twin Rivers Queenstown Cycle Trail.
5. To collate this evidence, I have read the following documentation:
 - Statement of Evidence of Helen Juliet Mellsop on behalf of Queenstown Lakes District Council LANDSCAPE 18 March 2020.
 - SECTION 42A REPORT of Emily Suzanne Grace on behalf of Queenstown Lakes District Council Chapter 46 RURAL VISITOR ZONE – TEXT, VARIATION AND MAPPING 18 March 2020.
 - PDP Ch 3 Strategic Direction.
 - PDP Ch 46 Rural Visitor Zone.
 - Queenstown Cycle Trail counter data 1 January 2019 to 14 May 2020.
 - Evidence of Ben Espie Stage 1 Submission (626) and Stage 2 submission (2509) for BHCT, Landscape Architect.
 - Expert evidence documentation that BHCT and DE Bunn & Co submitted through the PDP Stage 1 (626) and Stage 2 (2509) hearings.

RELIEF SOUGHT

6. This evidence relates to a 2.8ha of land owned by BHCT, Aurum Survey plan 3015-570-1D Ref: ([Appendix 1](#)). This is an amended area of land from Stage 1 and Stage 2, part of which is a High Landscape Sensitivity Area, which BHCT seek to have zoned Rural Visitor. BHCT also seek to amend the wording of CH 46 notified provisions referred to in points 30, 31 & 32.

SUMMARY OF STAGE 1 AND STAGE 2 BHCT RURAL VISITOR ZONE (RVZ)

7. Our business model for farm economic diversity centered around attracting local, national, and international visitors to stay and enjoy the peaceful and varied landscape settings our farm has over a relatively small area. The ODP areas of RVZ are generally located in Outstanding Natural Landscape.
8. Through the Stage 1 submission process BHCT sought that part of its land be re-zoned from Rural to Morven Ferry rural visitor Zone A and B. The Rural Visitor bespoke Zone of 20.2 ha was evolved from the above business model. It was based around two different landscape areas.
 - a. 1.5ha with flat terraces lying to the North for accommodation and related development.
 - b. 18.7ha characterized by connected ponds and wetlands and complimented by flat land with rising hills on the western boundary. Stock grazing, food production, winery, wetland walks, bird watching, and other such activities were anticipated for this area.
9. There was no decision made on that submission because the site was removed from Stage 1 and re-zoned Wakatipu basin rural Amenity Zone (WBRAZ) under Stage 2. Through the Stage 2 hearing process BHCT submitted that there was an opportunity for RV zones to be enabled in Rural Character Landscapes and in the Wakatipu Basin specifically. This was based on the significant change the Queenstown Cycle trail has had throughout the Wakatipu Basin.
10. While most would say that Morven Ferry Road is not remote, it is located on a no exit road at the eastern end of the Wakatipu Basin. By car it is a 25-minute drive from Queenstown and a 7-minute drive from Arrowtown. However, it is more remote in a time perspective if you travel by a differing mode of transport such as cycling or walking. This can take anything from half an hour to 4 hours depending on your starting point. The RVZ will be the first service and rest break area for at least 7km in any direction, apart from the DOC toilet located in the QLDC Reserve carpark, 400m away on Arrow Junction Road. Many parents with young children ride on the trail and would like somewhere to sit, refresh, recuperate, and use amenities such as toilet facilities.
11. In the Stage 3b submissions process to date, QLDC accepted several BHCT submission points (Rules and Objectives).

STAGE 3B SUBMISSION

12. Ch 46 RVZ Objectives and Policies fit our business model for the visitor accommodation and ancillary activities in the Rural Character Landscape.
13. We have considered and agree with Ms. Mellsope and Ms. Grace that rather than the bespoke zone of 20.2 ha, due to the Objective, Policy and Rule changes made in the PDP, a smaller 2.8ha RVZ is appropriate. By providing a rural alternative to accommodation outlets in the urban Queenstown setting it will enhance the appreciation for visitors of the varied landscape features of Morven Ferry Road and surrounds, including the Outstanding Natural Feature of the Arrow River.

14. Aurum Survey plan 3015-570-1D [Ref: \(Appendix 1\)](#) identifies this 2.8ha area of land located by Morven Ferry Road and the Twin Rivers trail. This map identifies a 0.7ha High Landscape Sensitivity Area adjacent to Morven Ferry Road. This has an approximate 6m change in contour rising to the West. The remaining 2.1ha is of low sensitivity and has three low lying natural terraces.
15. Mr. Espie in his Stage 2 evidence identified a 35m setback from Morven Ferry Road as a no build zone. This is the area we have also identified as a High Landscape Sensitivity Area. [Ref: \(Mr. Espie's evidence, June 2018, Page 5, 4.6\)](#)
"All buildings must be setback at least 35 metres from Morven Ferry Road"
16. The 2.1ha low sensitivity area has the best 'build-able' location and characteristics that Ms. Mellsop describes: [Ref: \(Mellsop, Page 9, 6.3 d\)](#)
"Whether there are reasonably 'build-able' locations within the proposed rezoning area. Factors that contribute to this consideration include a relatively easy contour (thereby minimising earthworks effects), ease of access, reasonable sunlight access, quality views and the like."
The low sensitivity area is characterized by three flat terraces rising gently to the South and East. Please refer to Ms. Cleaver's photographic landscape evidence.
[Ref: \(Appendices 6 & 7\)](#)
17. This area is in LCU18 Morven Eastern 'Foothills' with a capability to absorb additional development as low. We agree with Mr. Espie's Stage 2 evidence [Ref: \(Mr Espie's evidence, June 2018, page 7 & 8, point 5.5-5.8\)](#) that this area should have a rating of moderate to low, due to its topography and location away from important roads.

RECREATIONAL ACTIVITY / NZ CYCLE TRAIL

18. The initial idea for the New Zealand cycle trail program came from a nationwide job stimulus summit. The National Government recognised the potential economic and social benefits of such a scheme and provided the seed funding to get it underway.
19. Apart from the initial construction, there would be ongoing employment in maintaining the trails. There would also be benefits to the local community by bringing economic diversity to the regions through direct spin-off from new business opportunities being created along the trails, of similar nature to the economic benefits the Central Otago Rail Trail has created through that region.
20. From 1 January 2020 to 14 May 2020 over 27,719 trail journeys were recorded at the Morven Ferry Road Intersection Counter. NB: A journey is one movement recorded by the counter, it may be one person travelling to and from a destination past the same counter. [Ref: \(Appendix 4, QTT Trail Count Report 2020 page 3\)](#)
21. Queenstown Trails Trust user data reports that the trail is an important part of the community's resilience and wellbeing. Data prior to March 2020 showed 42% of trail users were local and 58% visitors. Comparisons of data from March, April, and May 2019 and 2020 respectively, show the total number of trail users increased by

approximately 40% in May; indicating that significantly more locals are using the trail.
Ref: (Appendices 4 & 5, QTT Trail Count Report 2020; & QTT Trail Count Report 2019)

22. The data indicates that moving forward in a vastly different economic and social environment, the trail will continue to be an important part of the wider Queenstown community's social and economic wellbeing.
23. Our revised 2.8ha RVZ helps to achieve this social and economic wellbeing by recognizing that there are services and facilities needed in this area that will enhance both visitors and locals cycle trail user experience in this part of the district and addressing those needs.

LANDSCAPE SUMMARY

24. Apart from a small section of Morven Ferry Road, there is extremely limited visibility of the RVZ area from public places due to the higher and rolling elevation of the land from Morven Ferry Road, Arrow Junction Road and the no-name access road to the Arrow River. It is only within the last approximately 200m from all 3 directions, that the RVZ will be seen by trail users. This ensures people using the trail know they have reached the Junction Point that is located at the halfway point between Lake Hayes Estate, Arrowtown and Gibbston.
25. This 2.8 ha RVZ has an extremely limited view to the Junction of the Trails from the low sensitivity area.
26. The Twin Rivers Trail is defined as 'not a public place' in both the ODP and PDP.
27. The RVZ cannot be seen from the Crown Range Road.
28. Please refer to Ms. Cleaver's photographic landscape evidence.
Ref: (Appendices 6 & 7)

SERVICES

29. Access to the RVZ will be approximately 100m from Morven Ferry Road and the Trail Junction via the new access road consented by Resource Consent RM 171268. Services to the site have been investigated by James Hadley in 2015 and 2018 and are able to be provided. Ref: (Appendix 8: Stage 2 evidence, James Hadley, 11 June 2018)
30. There are no natural hazards on the site or recorded in the Council Natural Hazards Database. Ref: (Appendix 8: Stage 2 evidence, James Hadley, 11 June 2018)
Ref: <http://qldc.maps.arcgis.com/apps/webappviewer/index.html?id=e007801d3f1c4384bedf1ed036dfc41b>

CH 46 RURAL VISITOR ZONE RULE CHANGES.

31. BHCT agrees with the Objectives, Policy and Rules in CH 46 except for 46.2.1.a & 46.5.2.1 (or.2) Changes sought

Policy:

~~46.2.1.a Areas identified as a Rural Visitor Zone shall be generally remote in location, difficult have limited visibility to see from public places, and largely comprised of areas of lower landscape sensitivity, with any areas of Moderate – High and High Landscape Sensitivity specifically identified.~~

Changes to Rules – delete words ‘difficult’ ‘to see’ and replace with ‘have limited visibility’

Reason: The word ‘difficult’ is referring to visibility in this instance. For some Rural Visitor Zones, it is important that they can be seen to a limited degree from public roads, especially when people are close to a destination they are trying to locate. It is quite common to experience a positive feeling in an unknown environment when having located and then arrived at the destination. We note that the notified provisions were formulated for RVZ areas that were exclusively within ONLs. The site to which this submission relates is not within an ONL and therefore, we do not consider it necessary for built development to be difficult to see.

32. 46.4 Rules – Activities

~~46.5.2.1 In the <x,y and z Rural visitor Zones> the total maximum ground floor area across the zoned area, excluding any areas identified as Moderate – High and High Landscape Sensitivity, shall be 500m².~~ There are two of Rule 46.5.2.1. so I suggest this is Rule 46.5.2.2.


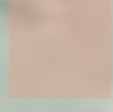

Delete Rule 46.5.2.1 (or. 46.5.2.2.) If a limit is to be set for the building footprint on each RVZ area, then the Building site coverage area for Morven Ferry RVZ is to be 1500m².

Reason: A 500m² total footprint area for a RV zone is uneconomic and would be contrary to, and hinder the Strategic objectives of 3.2.1.1, 3.2.1.6 and 3.2.1.8. This is the equivalent of two 250m² houses, or one managers house of 150 m² and 7 x 50m² accommodation units. For example, Kinross Cottage complex at Gibbston has an approximate building footprint coverage of over 1200m².

33. BHCT agrees with Ms. Mellsop’s evidence [Ref: \(Mellsop, Page 7 & 8, 5.5\)](#), that the inclusion of Standard 21.7.2 Buildings would be appropriate for inclusion in Ch 46 RVZ.



LEGEND

-  Rural Visitor Zone (2.8ha)
-  High sensitivity area (0.7ha)
-  Low sensitivity area (2.1ha)



DATA QUALITY STATEMENTS

PROPERTY DATA
The property data has been sourced from land information New Zealand (LINZ). The accuracy of the boundary data is estimated to be within 50mm.

SURVEY DATUMS
Horizontal coordinates are in terms of Mount Nicholas 2000 Circuit.
Vertical elevations in terms of Mean Sea Level (Dunedin Vertical Datum).
LIDAR contours sourced from QLDC.
Contour interval 1.0m

**ZONE CONCEPT OVERVIEW
MORVEN FERRY ROAD
WAKATIPU BASIN**

DATE: 29 May 2020 Scale 1:1500 DRAWING & ISSUE No. 3015-570-1D
BY: Antony White Original Plan A3



PO Box 2493
Wakatipu 9349
Ph 03 442 3466
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Appendix 2 - Deleted

Appendix 3



APPENDIX 3: VIEWPOINT LOCATION 1 - Immediately north of the public carpark located at the southern end of Arrow Junction Road.

- The two proposed Rural Visitor Zones are shown in red.
- The two proposed Rural Residential Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 2 - North of the "T" intersection of Morven Ferry Road and the Twin Rivers Trail.

- The proposed Rural Visitor Zone is shown in red.
- The proposed Rural Visitor Zone - Restricted and the two Rural Residential Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 3 - From the “T” intersection of Morven Ferry Road and the Twin Rivers Trail.

- The proposed Rural Visitor Zones is shown in red.
- The proposed Rural Visitor Zone - Restricted and the two Rural Residential Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 4 - Immediately north of the driveway entrance to 287 Morven Ferry Road.

- The proposed Rural Visitor Zone - Restricted is shown in red.
- The proposed Rural Visitor Zone and the two Rural Residential zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 5 - Located on the Arrow River Bridges Ride trail near 189 Morven Ferry Road.
- The proposed Rural Residential Zone - East is shown in red.
- The proposed Rural Residential Zone - West and the Rural Visitor Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 6 - Located on the Arrow River Bridges Ride immediately east of the proposed RRZ-E.
- The proposed Rural Residential Zone - East is shown in red.
- The proposed Rural Residential Zone - West and the Rural Visitor Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 7 - Located on the Arrow River Bridges Ride trail near the south east boundary of 205 Morven Ferry Road (The Hoskin Property).

- The proposed Rural Residential Zone - East is shown in red.
- The proposed Rural Residential Zone - West and the Rural Visitor Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 8 - Located along the SH6 (Gibbston Highway) immediately north of 1330 Gibbston Highway.

- The proposed Rural Residential Zone - East is shown in red.
- The proposed Rural Residential Zone - West and the Rural Visitor Zones are not visible.
- The Morven Ferry Ltd proposed zone is not visible.



APPENDIX 3: VIEWPOINT LOCATION 9 - Approximately 40m north east of the stock over-pass on the Twin Rivers Ride Trail.

- The proposed Rural Residential Zone - West is shown in red.
- The Morven Ferry Ltd proposed zone is shown in orange.
- The proposed Rural Residential Zone - East and the Rural Visitor Zones are not visible.



APPENDIX 3: VIEWPOINT LOCATION 10 - Located a few metres east of the Thompson's Hill sign on the Twin Rivers Ride Trail.

- The proposed Rural Residential Zone - West and the Rural Visitor Zones are shown in red.
- The proposed Rural Residential Zone - East is not visible.
- The Morven Ferry Ltd proposed zone is not visible.

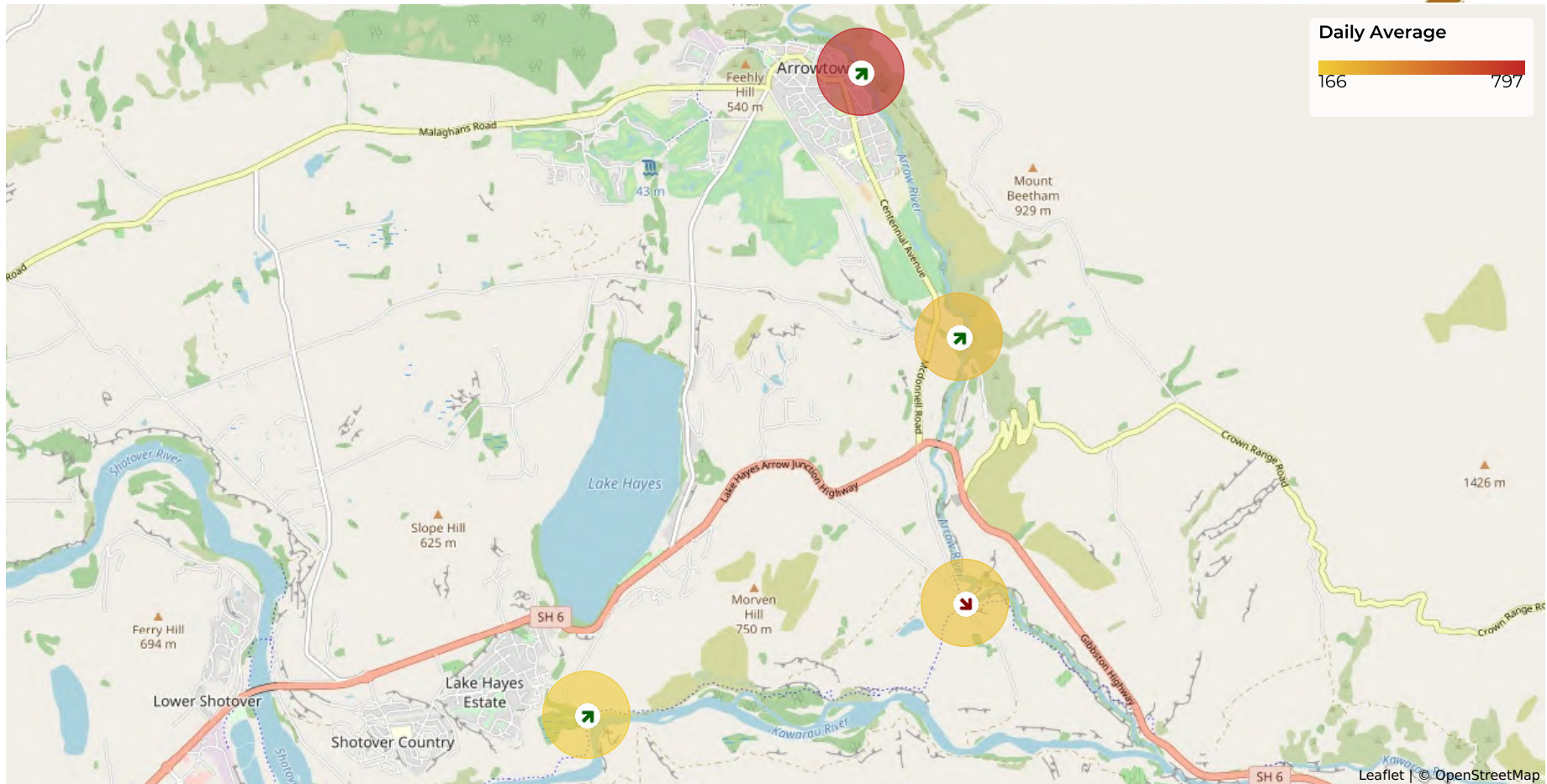


QTT Trail Count
Report (Twin
Rivers &
Arrowtown Trail)
2020

Report for Debbie MacColl

1 January 2020 → 14 May 2020

Trail User Heat Map



Report for Debbie MacColl

1 January 2020 → 14 May 2020

QTT All Users - Daily Ave.

Daily Average

1,426

↗ +1.7%

📊 Compared to 02/01/2019 → 16/05/2019

QTT All Users - Total

Total

191,081

↗ +1.0%

📊 Compared to 02/01/2019 → 16/05/2019

QTT - Peds

Total

105,975

▬ -0.1%

📊 Compared to 02/01/2019 → 16/05/2019

QTT - Cyclists

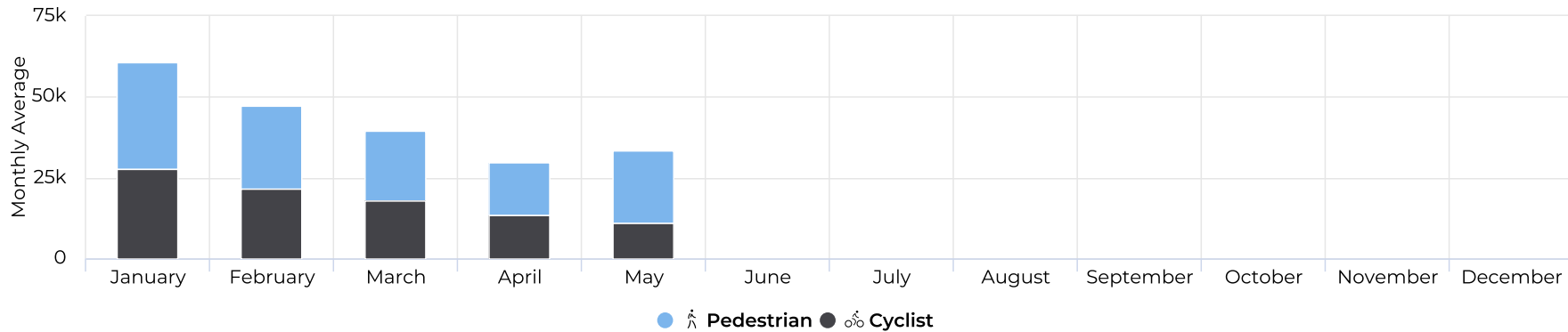
Total

85,106

↗ +2.3%

📊 Compared to 02/01/2019 → 16/05/2019

Cyclists versus Pedestrians ↗



Key Figures Summary

Site	Total		Average		Peak Count		Peak Period	
QT - Arrow River	106,777	▲ 1.8%	797	▲ 2.5%	1,825	▼ -0.2%	Thu 2 Jan 2020	Wed 2 Jan 2019
QT - Swain Bridge	34,357	▲ 8.1%	256	▲ 8.9%	575	▼ -16.1%	Thu 2 Jan 2020	Wed 2 Jan 2019
QT - Morven Ferry Rd	27,719	▼ -24.9%	207	▼ -24.3%	551	▼ -65.8%	Thu 2 Jan 2020	Wed 2 Jan 2019
QT - Billies Bridge	22,228	▲ 42.5%	166	▲ 43.5%	463	▲ 45.6%	Fri 10 Apr 2020	Wed 2 Jan 2019

📊 Compared to 02/01/2019 → 16/05/2019

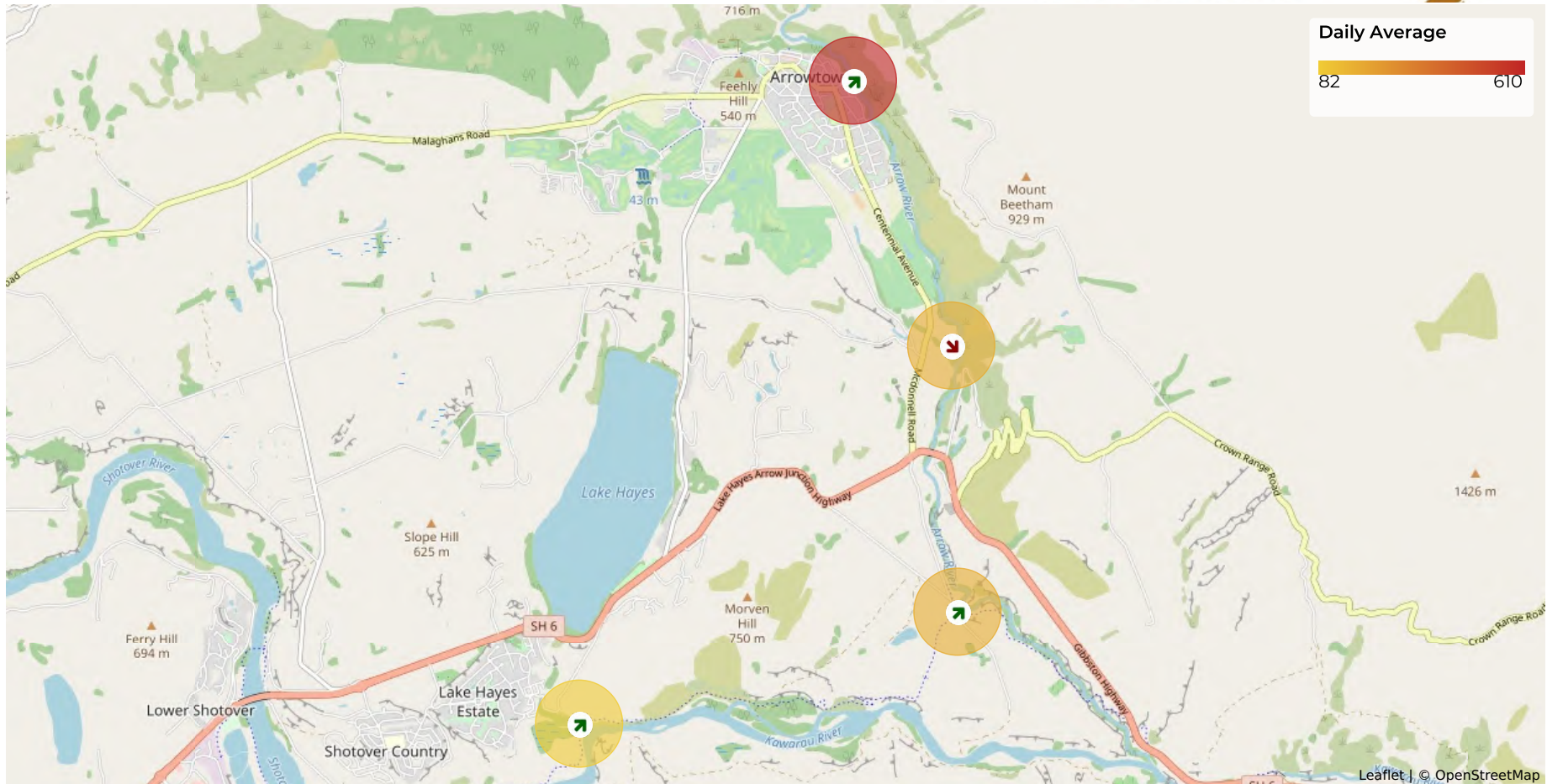


Trail Count
Report 2019
(Twin
Rivers/Arrow
River Trail)

Report for Debbie MacColl

1 January 2019 → 31 December 2019

Trail User Heat Map



Report for Debbie MacColl

1 January 2019 → 31 December 2019

QTT All Users - Daily Ave.

Daily Average



993

+30.7%

Compared to 02/01/2018 → 01/01/2019

QTT All Users - Total

Total



362,556

+30.7%

Compared to 02/01/2018 → 01/01/2019

QTT - Peds

Total



207,054

+24.7%

Compared to 02/01/2018 → 01/01/2019

QTT - Cyclists

Total

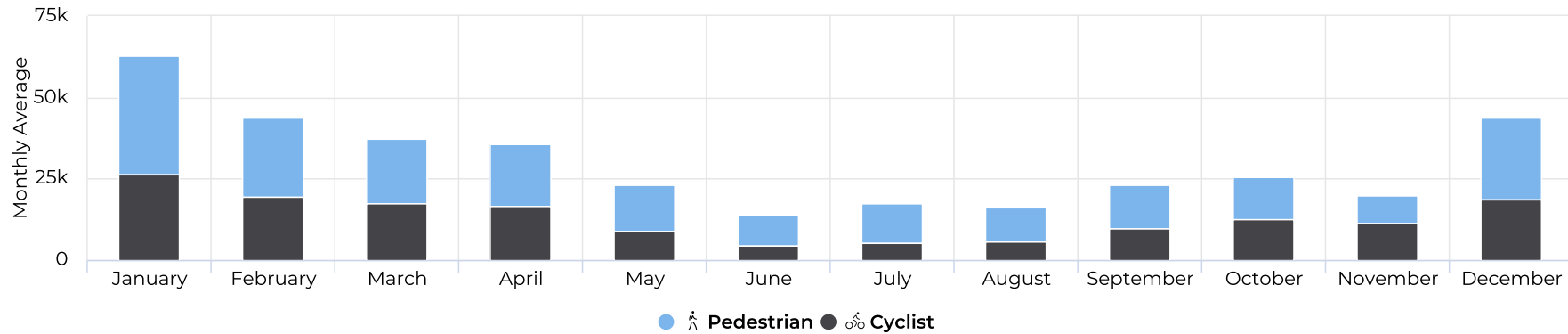


155,502

+39.6%

Compared to 02/01/2018 → 01/01/2019

Cyclists versus Pedestrians



Report for Debbie MacColl

1 January 2019 → 31 December 2019

Key Figures Summary

Site	Total		Average		Peak Count		Peak Period	
QT - Arrow River	203,898	▲ 72.8%	610	▲ 26.8%	1,987	▲ 3.6%	Sun 29 Dec 2019	Sat 29 Dec 2018
QT - Swain Bridge	64,878	▼ -14.7%	178	▼ -14.7%	2,041	▼ -48.7%	Sat 16 Nov 2019	Tue 30 Jan 2018
QT - Morven Ferry Rd	63,790	▲ 16.2%	175	▲ 16.2%	1,613	▲ 47.3%	Wed 2 Jan 2019	Wed 26 Dec 2018
QT - Billies Bridge	29,990	▲ 5.1%	82	▲ 4.8%	318	▼ -47.0%	Wed 2 Jan 2019	Fri 30 Nov 2018

📊 Compared to 02/01/2018 → 01/01/2019

Appendix 6: View of Stage 3b proposed RVZ (aerial photo taken at 50mm lens equivalent at 3.01pm 27 May 2020)



KEY

- RVZ boundary - approx 2.8ha
- High Landscape Sensitivity Area
- 1** **Approx 90m West of TRJ**
- 1a, 2, 2a, 3 & 4** **Other points spaced out showing potential positions of buildings**
- A** **Twin Rivers Trail Junction Point - trail branches in 3 directions here**
- B** **Morven Ferry Road**
- C** **Arrow Junction Road and Trail carpark**
- D** **Twin Rivers Trail towards Gibbston valley, no-name road, and beside Arrow River reserve**
- E** **Twin Rivers Trail towards Lake Hayes Estate**
- F** **Crown Range Chainbay 4 (East) - not shown**

Appendix 7: Position A - View West from Twin Rivers Trail Junction to proposed RVZ
(Photographs taken at 50mm lens equivalent at 3.59pm 27 May 2020, and 1.05pm 28 May 2020)



Photo 1a:
Position A - Twin Rivers Trail Junction (TRJ) at the road point on Morven Ferry Road.

Zoom 1 inset shows the tops of Position 1 and 1a visible between young cherry trees.

The High Landscape Sensitivity Area (HLSA) overlay is visible in the mid-foreground; approx 15m from Position A at the closest point from TRJ and across Morven Ferry road.



Photo 1b: approx. 30m East uphill from the Position A, and beside Morven Ferry Road. Zoom 2 inset shows the top of Position 2 visible beyond a young cherry tree. The HLSA overlay is visible in the mid-foreground.

Appendix 7: Position B - View East from Morven Ferry road to proposed RVZ
(panorama photo stitched from 6 photographs taken at 50mm lens equivalent at 2.31pm 27 May 2020)



Photo 2a: Current View - photo taken from Morven Ferry Road approx 400m north of proposed zone. Positions from Aerial Photo shown in red. Poles are 5.5m high; tractor and mower is 15m long; Poles 1 and 1a are approx 15m apart; Pole 2 and Car at 2a are approx 18m apart.



Photo 2b: Potential Buildings - x3 at 15m x 10m (150m); x6 duplex accom units at 10m x 8m (80); x1 10m x 7m (70m). Buildings placed behind each other minimise visibility from Morven Ferry road, while maximising view shafts through to Coronet Peak (North-West)



Photo 2c: Current landscaping/trees shown in leaf and grown: minimise visibility from Morven Ferry road, while maximising view shafts through to Coronet Peak (North-West).

Appendix 7: Position C - View South East from Arrow Junction road and Twin Rivers Trail carpark to proposed RVZ (Photographs taken at 50mm lens equivalent at 4.09pm 27 May 2020)



Photo 3a: Position C - car park area Twin Rivers trail at Arrow Junction road. Zoom 1 inset shows Position 1 slightly visible between trees; Zoom 2 inset shows Position 2 slightly visible beyond foreground tree trunk. Note: in summer the foreground trees would be in leaf and further obscure the views through. The HLSA is intermittently visible through existing vegetation.



Photo 3b: Position C - on Arrow Junction road directly beside the car park area on the Twin Rivers Trail. The HLSA overlay is partially visible beyond existing vegetation in left mid-view. Zoom 3 - No positions within the RVZ are visible at all.



**Appendix 7: Position D -
View West towards
proposed RVZ**

Photos taken at
lens equivalent of 50mm
1.10pm to 1.21pm 28 May 2020

Photo 4a: View West along the
Twin Rivers Trail;
Position 1 in mid-view.

Zoom 1 inset shows
tractor and pole at Position 1
with limited visibility through
current tree-line at roadside.
The HLSA has extremely limited
visibility also, due to the existing
vegetation and hummocky
landform in front of it.

The neighbour's dwelling shown
mid-view, is below the hill opposite
the RVZ with sheltering mature
vegetation and views to the North.



Photo 4b: View North
on the Twin Rivers Trail,
near the Arrow River;
A neighbour's dwelling is
directly beside the Trail.
Mature vegetation largely
screens the Property.
It's views are Northerly away
from the RVZ.



Photo 4c: View North-East
from the Twin Rivers Trail. The Arrow
River bank is in the foreground.

A large house with mostly North
facing views is partially visible
on the opposite river bank.
Mature vegetation including the
vegetation shown in Photo 4b,
largely screens the distance views
of the RVZ.

Appendix 7: Scenic views of Wakatipu Basin, Crown Range viewpoint Chainbay 4 carpark

(panorama photo stitched from 17 photographs taken at 50mm lens equivalent at 12.25pm 21 May 2020;

View split into 3 slices from left to right, a, b, c)



Photo 5a: South-East View of Wakatipu Basin - Gibbston Valley Winery & Accom complex clearly visible in foreground.



Photo 5b: South-West View of Wakatipu Basin - Chard Farm Winery - mid-view, left.



Photo 5c: West View of Wakatipu Basin - Coronet Peak mid-view right; Crown Range extends across the whole foreground view.

Stage 1 & Stage 2 proposed RV Zone B in left mid-view (pink outline), refer Zoom photos 6a & 6b.

Stage 3 proposed RVZ not visible, refer Zoom photo 6c.

Appendix 7: Zoom View of Stage 1 & 2 proposed RV Zones; Stage 3b proposed RVZ - from viewpoint above Crown Range Chainbay 4 carpark (from left to right, split into 3 sections)
(panorama photo stitched from 7 photographs taken at 600mm lens equivalent at 12.15pm 21 May 2020)



Photo 6a: Zoom - South & West Boundary (pink line) Stage 1 & Stage 2 proposed bespoke RV Zone B.



Photo 6b: Zoom - West Boundary (pink line) Stage 1 & Stage 2 proposed bespoke RV Zone B. Crown Range Escarpment in foreground (blue line).



Photo 6c: Stage 3b RVZ is completely blocked by Crown Range Escarpment (blue line). For reference Zoom 1 inset shows the roof of the BHCT stone barn (shown in photo 7a).

Appendix 7: Views North to West located on the Stage 3b RVZ

(7a & 7b panorama photo stitched from 5 photographs taken at 50mm lens equivalent at 12.59pm 28 May 2020)

(7c panorama photo stitched from 5 photographs taken at 50mm lens equivalent at 11.27am 01 June 2020)



Photo 7a: North-West View from RVZ. Queenstown Cycle Trail in foreground left to right. Morven Ferry road becomes visible at Location B, right mid-view. Neighbours dwellings blocked from views with mature vegetation. BHCT stone barn left mid-view.



Photo 7b: North View from RVZ. Cycle trail continuing through left mid-view, behind hummocky brow to Trail Junction (TRJ). Morven Ferry road disappears from view. Arrow Junction road and carpark centre mid-view, completely obscured by vegetation.



Photo 7c: View West from the edge of the HLSA area. Locations 1-4 are located in the foreground, through to left mid-view. Landscape is low-lying, gentle sloping ground down to the cycle trail. The cycle trail becomes visible in right mid-view, emerging from behind a rocky knob.

Appendix 8

Before Queenstown Lakes District Council

In the matter of The Resource Management Act 1991

And The Queenstown Lakes District Proposed District Plan
Stream 14 Wakatipu Basin rezoning

STATEMENT OF EVIDENCE OF JAMES WILLIAM PETER HADLEY FOR

Barnhill Corporate Trustee Limited and DE, ME Bunn & LA Green (#2509)

Morven Ferry Limited (#2449)

Dated 11 June 2018

Applicant's solicitors:
Vanessa Robb | Vanessa Robb

Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
vanessa.robb@al.nz | vanessa.robb@al.nz

**anderson
lloyd.**

QUALIFICATIONS AND EXPERIENCE

- 1 My name is James William Peter Hadley. I am a consulting civil and structural engineer and Principal of the consulting engineering company Hadley Consultants Ltd. (HCL)
- 2 I hold the qualifications of Bachelor of Engineering (Civil) with Honours. I am a Chartered Member of Engineering New Zealand (CMEng), a Chartered Professional Engineer (CPEng) and a member of the International Professional Engineers Register (IntPE). I have over 25 years' experience in the design and construction of civil and building structures with particular expertise in the design and construction of development infrastructure for roading, water supply, wastewater and stormwater disposal systems. I have extensive experience in design and implementation of infrastructure works for both private companies and for Local Authorities throughout the lower South Island.

CODE OF CONDUCT

- 3 Whilst this is not an Environment Court Hearing, I confirm that I have read the Code of Conduct for Expert Witnesses as contained in the Environment Court Practice Note dated 1 December 2014. I agree to comply with this Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

- 4 HCL have been engaged by the land owners (Morven Ferry Limited & Barnhill Corporate Trustees Limited, D. E. & M. E Bunn & L.A. Green "Barnhill")) and, to provide civil engineering advice relating to the 3 Waters servicing and Natural Hazard issues for the proposed zone change identified in their Submissions 2449 and 2509.
- 5 In 2015 my firm prepared separate reports for Morven Ferry Limited and Barnhill with regard to their adjacent land. Reports for both parties related the Preliminary Assessment of Natural Hazard Risk and Servicing Feasibility to support the Morven Ferry Limited and Barnhill Submissions on Stage 1 of the Proposed District Plan (PDP). I refer to these as the "Stage 1 Assessments".
- 6 I understand that the current Barnhill Stage 2 Submissions (to which this evidence relates) have been varied slightly from what was proposed in Stage 1 whereby average lot sizes were sought for the Rural Residential Zone areas (in the alternative, it is sought that proposed RRZ areas are zoned WBLP). In order to alleviate some concerns raised, the submitters now seek a 4000m² minimum lot size provision. I am

also aware that new building coverage restrictions are now proposed to apply to Rural Visitor Zones A and B.

- 7 My evidence will address the following:
- (a) Confirmation of the basis and conclusion of HCL's earlier Stage 1 Assessments.
 - (b) The changes now made to the zoning proposals for the sites since the Stage 1 Assessments were prepared and in particular the change in water demand volumes and wastewater flow generation that could apply after confirming amended Stage 2 minimum lot sizes and building coverage.
 - (c) Assessment of whether the changes made to the zoning proposals under the Stage 2 Submissions alters the previous Stage 1 assessment of Natural Hazards for the sites and whether any constraints exist for development.
 - (d) Assessment of the feasibility of 3 Waters Infrastructure servicing under the amended Stage 2 demand scenario arising from alternate zonings and building coverage limits.

DOCUMENTS REVIEWED

- 8 In preparing this evidence I have reviewed the following documents and reports:
- (a) HCL's Stage 1 Assessments
 - (b) Stage 2 Submissions 2449 and 2509, including the relevant accompanying expert reports.
 - (c) The evidence of Andrea Jarvis for the Queenstown Lakes District Council (QLDC), dated 28 May 2018.

PREVIOUS REPORTING

- 9 HCL's Stage 1 Assessments (in 2015) related to the feasibility of infrastructure services and the impact of Natural Hazards on the earlier Stage 1 proposals by Morven Ferry Limited and Barnhill.
- 10 The earlier 2015 Stage 1 work assessed rezoning approximately 47.7ha as a Rural Residential Zone and 20.2ha as a Rural Visitor Zone. The proposed new zones were all accessed off Morven Ferry Road. The investigation and reporting work concluded that;
- (i) It was feasible to service the Stage 1 rezoning proposals with both potable water and wastewater disposal solutions which would satisfy QLDC standards. These solutions involved development of new

private water and private wastewater schemes to service the proposed new zones.

- (ii) Stormwater runoff could be adequately managed for the proposed new zones in accordance with QLDC Standards, including use of Low Impact Design (LID) principles.
- (iii) Natural hazard issues did not inhibit the development proposals over the areas to be rezoned.

THE KEY CHANGES IN THE STAGE 2 PROPOSAL

- 11 Since the Stage 1 Assessments were prepared, the key changes that have been made to the zoning proposals pursued for each area (being an alternative amended WBLP zoning via Stage 2 of the PDP) are as follows;
- (a) The areas to which the Stage 2 zoning proposals relate are unchanged and remain the same as addressed in HCL's Stage 1 Assessments. Therefore, there is no affect on HCL's Stage 1 Assessment of natural hazard impacts for the site and our Stage 1 findings are unchanged.
 - (b) The proposed zoning density in terms of development potential for the Rural Residential Zone/WBLP (47.7ha) has been amended to a minimum lot size of 4,000m². The Stage 1 Assessments were considered on the basis of conservative potential flow generation using the minimum average lot size for the Rural Residential Zone in 2015. This was also 4,000m². Accordingly, the new Stage 2 proposals do not impact the demand scenarios considered in the Stage 1 Assessments and consequently there is no impact on, or change to, the findings of HCL's earlier Stage 1 work.
 - (c) There are some changes proposed to the maximum permitted building coverage in the Rural Visitor Zones. The Stage 1 Assessments considered Rural Visitor Zone A (1.5ha) with no building coverage limit and Rural Visitor Zone B (18.7ha) with a 5% building coverage limit, equating to a maximum building coverage of some 9,350m². Under the Stage 2 proposal, Rural Visitor Zone A is now limited to a maximum building coverage of 1,500m² (being 10%) and Rural Visitor Zone B is limited to a maximum of 3,000m². These new Stage 2 proposals are therefore now considerably less than the potential demand considered under the Stage 1 Assessments and again there is no impact on, or change to, the findings of HCL's earlier Stage 1 work.

NATURAL HAZARDS ASSESSMENT FOR STAGE 2

- 12 As stated at 11(a), there is no change to the areas to which the Stage 2 zoning proposals relate and as such there is no effect on or change to HCL's Stage 1 Assessments. Therefore, natural hazard issues do not inhibit the Stage 2 rezoning proposals by Morven Ferry Limited & Barnhill.

3 WATERS SERVICING FEASIBILITY FOR STAGE 2

- 13 The demand scenarios under the Morven Ferry Limited & Barnhill rezoning proposals in Stage 2 have been compared against the Stage 1 Assessments and have been found to be less than those considered in HCL's Stage 1 work. Therefore, it is feasible to service the Stage 2 rezoning proposals with both potable water and wastewater disposal solutions which would satisfy QLDC standards. These solutions involve development of new private water and private wastewater schemes to service the proposed new zones. There is no change in the areas included in the Barnhill Stage 2 Submission, therefore there is no change in the findings of the Stage 1 Assessments for stormwater.

THE EVIDENCE OF ANDREA JARVIS

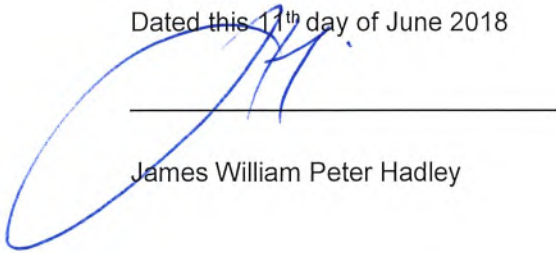
- 14 Andrea Jarvis addresses the Morven Ferry Limited & Barnhill proposals at her paragraph 88.1 and does not oppose the rezoning requested from an infrastructure perspective. Ms Jarvis notes the expectation that sites such as Morven Ferry Limited & Barnhill's will be serviced privately on-site at the developer's cost, and due to this on-site servicing, there is no increase in the QLDC infrastructure requirements (physically and financially). She further notes that there should be no expectation that the on-site infrastructure will ultimately be joined to the Council schemes.
- 15 I agree with Ms Jarvis and confirm that the basis of the feasibility assessment of the 3 Waters infrastructure for the proposed Barnhill Stage 2 rezoning is consistent with her qualifications and assumptions that any on-site infrastructure will remain privately owned.

CONCLUSION

- 16 The Morven Ferry Limited & Barnhill Stage 2 Submissions for rezoning have been considered against the 2015 Stage 1 Assessments conducted by HCL.
- 17 The findings of the Stage 1 Assessments are unchanged whereby natural hazard issues do not inhibit the Stage 2 rezoning proposals and it remains feasible to provide private 3 Waters infrastructure to service the proposed rural living areas

and Rural Visitor areas requested by Morven Ferry Limited & Barnhill under their Stage 2 Submission.

Dated this 11th day of June 2018

A handwritten signature in blue ink, consisting of a large, sweeping loop followed by several smaller strokes, positioned over a horizontal line.

James William Peter Hadley