

Before the Hearings Panel  
For the Proposed Queenstown Lakes District Plan

Under the Resource Management Act 1991 (**RMA**)

In the matter of Variation to the Queenstown Lakes Proposed District Plan:  
Urban Intensification Variation

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**Statement of Evidence of Richard Michael Kemp**

Relating To: Submission #681 - Passion Development Limited - on the Proposed  
Urban Intensification Variation

4 July 2025

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## **EXECUTIVE SUMMARY**

This evidence supports a submission by Passion Development Limited seeking to rezone the lower slopes of Lot 1 DP 20613 at Fernhill to Medium Density Residential Zone (**MDRZ**) or, alternatively, Lower Density Suburban Residential Zone (**LDSRZ**), in both cases with a Visitor Accommodation Sub-Zone overlay.

The Urban Intensification Variation (**UIV**) was notified to give effect to Policy 5 of the National Policy Statement on Urban Development 2020 (**NPS-UD**). The submission is within scope as it directly advances that purpose by enabling development commensurate with accessibility and relative demand, as required under Policy 5(a) and 5(b).

The site is highly accessible by walking, cycling, and public transport, including Orbus Route 1 with 15-minute peak frequencies. This places the site among the most accessible undeveloped sites in Queenstown and meets the accessibility expectations of Policy 5(a).

Council's economic evidence (Fairgray) confirms there is high relative demand for detached housing typologies and a likely shortfall in the central Queenstown ward. It also acknowledges that LDSRZ does not easily enable a range of housing types (para 2.6). Rezoning this large, unconstrained greenfield site would allow comprehensive, master-planned development that responds to market demand - similar to examples such as Jade Lake (on Wynyard Crescent in Fernhill).

The area that is sought to be rezoned lies within the area identified in the updated landscape schedule (Schedule 21.22.12) as having capacity for urban expansion. It is serviceable, not hazard-prone, and can be developed sensitively and efficiently.

The recommended rezoning will address a typology shortfall, support compact intensification, improve alignment with Policy 5, and contribute to a well-functioning urban environment in accordance with the PDP and the NPS-UD.

### **1. PROFESSIONAL DETAILS**

1.1 My full name is Richard Michael Kemp.

1.2 I hold a Bachelor of Planning (Honours) from the University of Auckland and have thirteen years of experience working as a Planner, including four years working for the Queenstown Lakes District Council (including formerly, Lakes Environmental) as a Planner within the Resource Consent Team; and also a secondment to the QLDC Policy Team working on Stage 1 of the Proposed District Plan.

1.3 Since 2015 I have worked in the private sector as a Planning Consultant under the business name Pragmatic Planning; undertaking work for private clients mostly in the Queenstown Lakes District and Auckland. The scope of my private sector experience includes the preparation of resource consent applications, the processing of resource consent applications on behalf of Auckland Council (both under the RMA 1991 and HASHAA 2013), various policy-related work for the QLDC, submissions on the Queenstown Lakes Proposed District Plan and Proposed Plan Variations on behalf of the private sector, and providing general planning advice to the private sector.

## **2. INTRODUCTION**

2.1 This evidence is on the QLDC's proposed Urban Intensification Variation (**UIV**) to the Proposed District Plan (PDP).

2.2 I authored the original submission (#681 - Appendix 1) on behalf of Passion Development Limited and a submission on the Spatial Plan 2.0 – “Call for Sites” (Appendix 2). My evidence elaborates on the submission (#681) and responds to the Planning (s42A reports) and expert evidence of the council. This planning evidence addresses:

- The policy context and background to the Urban Intensification Variation (UIV);
- The scope of the submission and applicable case law;
- A planning assessment of the rezoning proposal, including:
  - Accessibility (including methodology, public transport upgrades, and walkability),
  - Relative demand (based on economic evidence and Policy 5),
  - Landscape capacity and ONL context,
  - Infrastructure, servicing, and natural hazards,
  - Visitor accommodation and business land demand;
- A section 32AA evaluation considering the appropriateness and efficiency of the proposed zoning options;
- Conclusions and the recommended planning relief.

2.3 In preparing this evidence I have reviewed the following reports and statements:

- The UIV Section 32 Evaluation Report and supporting reports;
- Economic modelling used to inform the UIV;
- Strategic and zone-based Section 42A reports, including rezoning reports;
- Evidence from Susan Fairgray (economics), Richard Powell (infrastructure), Cam Wallace (urban design and accessibility), and Richard Knott (heritage);
- Landscape evidence for Schedule 21.22.12 (attached as Appendix 3);

- The National Policy Statement on Urban Development (2020, updated 2022);
- The Partially Operative and Proposed Otago Regional Policy Statements;
- Relevant RMA case law (Motor Machinists, Westfield, Bluehaven, Clevedon Cares) and planning commentary.

2.4 I am generally familiar with the subject site and Queenstown, having undertaken work in the District since 2012. I have undertaken a number of site visits, specifically around the subject site as well as the wider urban area of Fernhill.

### 3. **CODE OF CONDUCT**

3.1 I have read the Code for Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code and I agree to comply with it. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### 4. **BACKGROUND AND POLICY CONTEXT**

4.1 The Urban Intensification Variation (UIV) was notified by Queenstown Lakes District Council to implement Policy 5 of the NPS-UD, which requires regional and district plans to enable intensification where it is justified by accessibility or relative demand.

4.2 Policy 5 states:

*“Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:*

*(a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*

*(b) relative demand for housing or business use in that location.”*

4.3 Objective 3(c) of the NPS-UD reinforces this directive by requiring development to be enabled:

*“in areas where there is high demand for housing or for business land relative to other areas within the urban environment.”*

4.4 These provisions direct that development capacity be enabled where there is clear evidence of accessibility or market demand, not just in broad terms but for specific locations and typologies.

4.5 The UIV gives effect to Policy 5 through two mechanisms:

- Extending zoning across selected sites (primarily MDRZ and HDRZ);

- Modifying zone provisions (e.g. removal of density limits in MDRZ and ‘relaxing’ development controls i.e. building heights and setbacks).

4.6 The UIV does not propose any LDSRZ extensions, despite Council’s own economic evidence highlighting typology gaps<sup>1</sup>. The notified MDRZ and HDRZ land cannot be relied upon to satisfy all demand and the most appropriate way to address the shortfall is through extending the LDSRZ in appropriate areas.

4.7 The site subject to this submission is a large, undeveloped landholding at Fernhill. It is adjacent to the existing LDSRZ, lies below the ridgeline, and is located within the ONL (but inside the envelope for urban expansions now recognised in Schedule 21.22.12).

4.8 Landscape evidence supporting this position was presented by the Submitter and accepted during Environment Court-assisted mediation on the Landscape Schedules variation. The updated landscape schedule recognises this portion of Fernhill as suitable for urban expansion through infill development, provided it does not extend the urban pattern above the current highest elevation of the urban-zoned extent.

4.9 The Submitter also made a corresponding submission to the Queenstown Spatial Plan, which seeks urban zoning for the same area. This process has been significantly delayed, and there is now a strong need to address this shortfall through the UIV.

## 5. SCOPE OF THE SUBMISSION

5.1 The submission seeks rezoning of a site adjoining the existing urban edge. Although the site is currently zoned Rural, the relief sought aligns directly with the purpose of the UIV - to give effect to Policy 5 of the NPS-UD. That policy requires planning provisions to enable housing and business development where there is high relative demand or high accessibility.

5.2 In *Motor Machinists Ltd v Palmerston North City Council* [2014] NZEnvC 258, the Environment Court confirmed that a submission is “on” a plan change if it fairly and reasonably relates to the subject matter of the plan change and does not introduce a fundamentally new topic.

5.3 The Supreme Court in *Westfield (NZ) Ltd v Hamilton City Council* [2005] NZSC 17 likewise held that scope must be assessed in light of the purpose of the plan change. The UIV’s stated purpose is to give effect to Policy 5 of the NPS-UD (see Bowbyes para 5.3).

5.4 The High Court in *Bluehaven Management Ltd v Western Bay of Plenty District Council* [2023] NZHC 363 upheld a submission that proposed rezoning of rural land under the variation

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<sup>1</sup> S42a report by Ms Susan Fairgray, Para 4.37

represented implementing the NPS-UD. The Court found that enabling development where demand or accessibility is present was consistent with the variation's purpose.

5.5 In *Clevedon Cares Inc v Auckland Council* [2021] NZEnvC 150, the Environment Court further confirmed that where a submission proposes rezoning of adjacent land in line with the policy purpose, it may be within scope, even if not identified in the notified proposal.

5.6 Rachel Morgan's evidence (para 3.1) concludes that submissions on land outside the Urban Growth Boundary (UGB), including this submission, are out of scope. However, this view rests on legal advice and does not assess whether the submission fairly and reasonably relates to the purpose of the variation.

5.7 The strategic Section 42A evidence of Ms Bowbyes (para 9.3) confirms that the variation does not propose to extend the urban environment. However, paragraph 9.7 states that the spatial focus of the UIV includes land near the Queenstown commercial centre - which includes Fernhill.

5.8 The Council's rezoning evidence does not assess this submission on its planning merits. No evaluation has been undertaken of the site's accessibility, landscape capacity, servicing, or demand alignment. This omission further supports the need to evaluate the submission in accordance with the principles set out in case law.

5.9 The submission proposes a modest and logical extension of zoning adjacent to existing LDSRZ. It does not introduce a new policy issue and arises directly from the purpose of the UIV.

5.10 The proposal is comparable to other accepted scope decisions within Queenstown Lakes District, including Ladies Mile and Lake Hāwea South, where adjacent rural land was found to be within scope due to its alignment with objectives of the plan change.

5.11 Accordingly, based on legal precedent and the policy-driven approach affirmed by the Courts, the submission is properly "on" the variation and must be considered on its merits under the Resource Management Act 1991.

5.12 To exclude this site based on the UGB would be to prioritise a spatial boundary over the actual purpose of the variation, contrary to the approach supported by the Environment Court and High Court in recent decisions.

5.13 The rezoning sought by this submission is therefore within scope, both legally and functionally, and warrants full planning assessment.

## ASSESSMENT OF PLANNING MERITS

### 6. ACCESSIBILITY

6.1 The Council's methodology for assessing accessibility, as outlined in the UIV and Mr Wallace's evidence, focuses primarily on walkability from commercial centres. While relevant, this narrow interpretation does not fully implement Policy 5(a) of the NPS-UD, which also requires consideration of accessibility by existing or planned public and active transport.

6.2 The site performs strongly across all relevant transport modes:

- It is walkable to the Queenstown Town Centre (approximately 2 km);
- It lies within 500 metres of existing Orbus bus stops;
- Accessible by foot, bike, and bus from key destinations.

6.3 On 9 June 2025, the Otago Regional Council confirmed that Route 1 (Sunshine Bay–Fernhill–Queenstown) will operate every 15 minutes<sup>2</sup> during peak daytime hours. This improvement is confirmed in the draft Otago Regional Public Transport Plan<sup>3</sup> and materially enhances the accessibility profile of Fernhill.

6.4 Mr Wallace's evidence (Urban Design, section 15) acknowledges the increased frequency in response to NZTA's submission, but maintains that limited weight should be placed on public transport, favouring walkability as the primary metric. In my view, this interpretation does not reflect the wording of Policy 5(a), which requires that public and active transport be treated equally.

6.5 Given the site's proximity to town, its walkability, and the confirmed bus upgrades, it clearly meets or exceeds the accessibility expectations under Policy 5(a). It qualifies as one of the most accessible undeveloped sites in the Queenstown urban environment.

### 7. RELATIVE DEMAND

7.1 Relative demand refers to typology and location-specific preferences across the urban environment. In paragraph 4.39, Ms Fairgray defines it as:

*"The levels of demand for different dwelling types at each location across the urban environment."*

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<sup>2</sup> [https://www.orc.govt.nz/media/ihbh10gg/orc\\_route\\_q1\\_timetable.pdf](https://www.orc.govt.nz/media/ihbh10gg/orc_route_q1_timetable.pdf)

<sup>3</sup> <https://www.orc.govt.nz/media/uf2pgqmr/draft-otago-regional-public-transport-plan-2025-2035.pdf>

7.2 In paragraph 2.4, Ms Fairgray explains that economic modelling informed the UIV and that overall zoning is generally aligned with relative demand. However, it is clear that a location-specific typology assessment was not undertaken and that detached housing was not a focus. Ms Fairgray makes recommendations to better align zoning with relative demand.

7.3 In paragraph 6.37, Ms Fairgray supports enabling further provision for intensification in Fernhill:

*“Further provision for residential intensification in Sunshine Bay/Fernhill will provide increased flexibility for the market in relatively central locations.”*

7.4 She also cautions in paragraph 4.37:

*“The Whakatipu Ward urban environment ability to meet long-term detached dwelling demand may be limited, particularly within central areas.”*

7.5 Ms Fairgray explains that this shortfall is due to infrastructure constraints, but also - more significantly - because the market is expected to favour more intensive typologies due to the extensive rezonings to MDRZ and HDRZ. These statements confirm that although the UIV improves overall alignment with typology demand, gaps remain for detached housing in central Queenstown. The site offers a unique opportunity to address this shortfall.

7.6 In paragraph 2.6, Ms Fairgray further notes that LDSRZ may not easily enable a range of housing types. This shortcoming can be addressed on larger greenfield sites like this one, which allow for integrated planning. Comprehensive development, as demonstrated in Jade Lake and other examples, enables a mix of typologies to meet demand.

7.7 Detached dwellings in central Queenstown command a premium, indicating high relative demand compared to other areas. This satisfies the test in Objective 3(c), which requires that development be enabled in areas of higher demand relative to others.

7.8 While attached housing may be more feasible due to higher land values, Policy 5(b) requires planning decisions to reflect demand - not just economic viability. The relative demand for detached housing in Fernhill cannot be assumed to be met elsewhere and the plan should provide for this demand through zoning - as the MDRZ and HDRZ are unlikely to facilitate this typology in the long term.

7.9 This site is one of the few remaining opportunities to enable detached housing typologies in a central, accessible location. Failing to rezone would risk an enduring policy shortfall under Policy 5 and Objective 3(c).



7.10 The LDSRZ - or MDRZ, if preferred - is the zoning that best responds to the site's locational and typological characteristics. Each option addresses the policy gaps identified by Ms Fairgray and supports a market-responsive outcome.

7.11 Accordingly, the proposed rezoning strengthens the UIV's implementation of Policy 5(b) and the PDP's strategic direction, particularly in terms of housing choice, efficiency, and compact urban form.

## **8. LANDSCAPE CAPACITY**

8.1 The site lies within the ONL overlay, but the portion of the land proposed for rezoning by submission #682 is situated well below the skyline and below the elevation of existing residential zoning in Fernhill. It does not intrude on ridgelines or highly sensitive landscape features.

8.2 Landscape evidence commissioned by the Submitter was accepted during Environment Court-assisted mediation on the Landscape Schedules Variation (relating to Schedule 21.22.12). The updated landscape schedule (pending issuance of a consent order) explicitly acknowledges that some infill urban expansion may be appropriate in Fernhill, provided it does not extend the urban pattern to higher elevations.

8.3 This proposal complies with that limitation. It respects the ONL values and capacities and proposes development that is visually contained and integrated with the existing residential character of Fernhill.

8.4 This is not a challenge to the ONL itself. It is a site-specific response to capacity that has already been recognised through the PDP landscape schedule. Development will remain within the landscape's identified ability to absorb change.

## **9. SERVICING AND HAZARDS**

9.1 Water for Fernhill is supplied from the Fernhill Reservoir, sourced from the Two Mile intake. Mr Richard Powell confirms in his infrastructure evidence that the existing network in this area is generally sized for anticipated growth under the PDP.

9.2 Depending on where development occurs, local upgrades to the distribution network may be required. However, the upstream supply upgrade (Two Mile project) is already programmed in the Long Term Plan (LTP) for 2032–2034 and is not contingent on this rezoning.

9.3 Wastewater from Fernhill drains to a collector main along Glenorchy–Queenstown Road. While upgrades may be required if intensification occurs, Mr Powell confirms these can be addressed

through the consent process. No wastewater upgrades are currently scheduled in the LTP for this area.

9.4 Stormwater flows via natural channels and piped systems to Lake Wakatipu. The QLDC Code of Practice (Section 4.3.5) requires new development to maintain pre-development runoff rates (stormwater neutrality). Any upgrades can be secured by condition at resource consent stage.

9.5 Mr Powell confirms that servicing is a matter of discretion in LDSRZ, MDRZ, and HDRZ. This allows Council to assess infrastructure effects through subdivision or land use consent, consistent with the UIV's infrastructure strategy.

9.6 Accordingly, infrastructure is in place to support development of the site. Where upgrades are required, they can be managed through existing consenting tools. There is no infrastructure constraint that justifies exclusion from rezoning.

9.7 The area of the site proposed for rezoning is not considered to be at risk from natural hazards. There is a low liquefaction risk, a concealed fault line nearby, and a small area near the base of the site identified as being within an alluvial fan/landslide overlay.

9.8 These hazards are, however, localised and do not constrain the rezoning or development of the site. Any site-specific hazard mitigation can be addressed through geotechnical assessments undertaken at the time of resource consent. These matters do not preclude rezoning of the site.

## **10. VISITOR ACCOMMODATION AND BUSINESS LAND CAPACITY**

10.1 Policy 5 of the NPS-UD applies not only to housing, but also to business use. In Queenstown, Visitor Accommodation (VA) is a key business activity that generates significant demand for urban land and contributes directly to the economy.

10.2 Despite this, the Council has not undertaken updated business land demand modelling for the UIV. Nor has it assessed whether sufficient capacity exists to accommodate projected VA demand. There is no new Housing and Business Capacity Assessment (HBCA) to support the VA position in the variation.

10.3 Fernhill has experienced sustained VA activity through granted resource consents. There is a demonstrable and ongoing demand for visitor accommodation in this location, evidenced by the high volume of VA applications.

- 10.4 This level of demand supports applying a Visitor Accommodation Sub-Zone overlay to the site. The overlay provides a framework for managing VA effects while enabling activity consistent with Policy 5(b), which requires zoning to reflect demand for business use.
- 10.5 In the absence of a formal capacity analysis for VA, the submission provides an appropriate and market-responsive response to current shortfalls. The site is accessible, serviceable, and has proven demand.
- 10.6 The VA Sub-Zone overlay would support Queenstown's economic resilience, create employment, and support the tourism sector. In turn, this contributes to a well-functioning urban environment, as anticipated under the NPS-UD.
- 10.7 Failure to apply a VA Sub-Zone in this location would ignore a major business land pressure and perpetuate reactive consenting outcomes, instead of proactively managing growth.
- 10.8 Accordingly, the application of a VA overlay to the MDRZ or LDSRZ zone is justified. It improves alignment with Policy 5(b) and addresses an identified policy gap for business land in the Queenstown urban environment.

## **11. SECTION 32AA EVALUATION**

- 11.1 This section evaluates whether rezoning the lower slopes of Lot 1 DP 20613 to MDRZ or LDSRZ (with a Visitor Accommodation Sub-Zone overlay) is the most appropriate way to achieve the objectives of the PDP and implement Policy 5 of the NPS-UD.
- 11.2 The site is:
- Adjacent to existing urban zoning;
  - Highly accessible by walking, cycling, and public transport (including confirmed high frequency Orbus Route 1);
  - Within a landscape area identified as having capacity for urban expansion through intensification;
  - Serviceable using existing infrastructure, with any required upgrades to be addressed through resource consent;
  - Free from significant infrastructure or hazard constraints;
  - In a location with clear evidence and demonstrated relative demand for both detached housing typologies and visitor accommodation, including a likely shortfall.

### ***Efficiency***

11.3 The proposed rezoning would enable efficient use of land already integrated with the urban environment. MDRZ allows for a range of attached or higher-density forms and LDSRZ supports detached dwellings, directly addressing an identified shortfall.

11.4 Each option would allow infrastructure to be delivered incrementally and cost-effectively, while supporting access to public transport, services, and amenities.

### ***Effectiveness***

11.5 The rezoning gives effect to Policy 5(a) by enabling intensification in a highly accessible location. It also responds to Policy 5(b) by addressing relative demand, including detached housing typologies not otherwise accommodated within central Queenstown.

11.6 It strengthens implementation of Objective 3(c) of the NPS-UD, enabling housing and business use where demand is highest.

### ***Options Considered***

- **Option 1 – Retain Rural Zoning (Status Quo)**

Fails to implement Policy 5. Underutilises a site that is strategically located, accessible, and within confirmed landscape capacity. Leaves an identified gap in detached housing unmet. Perpetuates ad-hoc consent processes for visitor accommodation.

- **Option 2 – Rezone MDRZ with VA Sub-Zone Overlay (Preferred Relief)**

Maximises flexibility. Supports attached housing, compact form, good site yield, infrastructure efficiencies, and responds to intensification objectives. Less directly targeted at detached housing, but still supports Policy 5 and could deliver a degree of housing variety.

- **Option 3 – Rezone LDSRZ with VA Sub-Zone Overlay (Alternative Relief)**

Directly responds to the identified shortfall in detached housing typologies. Supports Objective 3(c) and delivers housing choice in a high-demand area. Slightly lower yield but strong alignment with relative demand and addresses unmet housing market demand and supports long-term urban form.

### ***Risk of Acting vs Not Acting***

11.7 Acting to rezone the site poses limited risk. Landscape, servicing, and hazard constraints can be managed through PDP controls and resource consenting.

Not acting would result in:

- Continued under-provision of detached housing in central Queenstown;
- Limited capacity for VA in a proven demand location;
- Failure to implement Policy 5 and Objective 3(c) in a balanced, location-specific manner;
- Market-responsive, integrated greenfield development will be foregone.

### ***Conclusion of 32AA Assessment***

11.8 The proposed rezoning is proportionate, effective, and efficient. It improves the responsiveness of the PDP to market conditions and better implements the strategic and policy direction of the NPS-UD and RMA. It addresses a recognised market gap, and supports a compact, accessible urban form. It is the most appropriate method under section 32AA.

## **12. CONCLUSION**

12.1 The submission is within the scope of the Urban Intensification Variation. It directly advances the purpose of the variation by enabling development commensurate with accessibility and relative demand.

12.2 The site is highly accessible, serviceable, and within the landscape capacity envelope identified through Environment Court-assisted mediation. It represents one of the few remaining locations where detached dwellings could feasibly be delivered close to the Queenstown Town Centre.

12.3 Ms Fairgray confirms high relative demand for detached housing typologies in central Queenstown. She also acknowledges that LDSRZ does not easily enable a range of housing forms. Rezoning a greenfield site such as this allows for comprehensive, market-responsive planning in line with recent successful examples like Jade Lake.

12.4 The proposed MDRZ with a VA Sub-Zone overlay is the most flexible and efficient zoning outcome. The LDSRZ with a VA Sub-Zone overlay remains an appropriate alternative, particularly if Council wishes to address detached housing more directly.

12.5 Ms Morgan's evidence (para 3.1) concludes the submission is out of scope based on the UGB. However, this interpretation is not consistent with the purpose of the UIV or with applicable case law.

12.6 The strategic evidence of Amy Bowbyes (paras 9.3 and 9.7) confirms that Fernhill is within the spatial focus of the variation and that the submission falls within the intended scope of its policy implementation.

12.7 The rezoning evidence has not assessed this submission on its merits. Planning evidence confirms that the site is suitable and that rezoning is justified based on Policy 5 and Objective 3(c).

12.8 I recommend that the lower slopes of Lot 1 DP 20613 be rezoned as:

- MDRZ with a Visitor Accommodation Sub-Zone overlay, or
- LDSRZ with a Visitor Accommodation Sub-Zone overlay (alternative relief).

12.9 This rezoning would better implement the NPS-UD, fill an identified policy and typology gap, and support a compact and responsive urban form in Queenstown.

12.10 The recommended changes will give better effect to the strategic objectives and policies of the PDP and are considered the most appropriate to achieve the purpose of the RMA and the direction set by the NPS-UD, the POORPS and the PORPS.

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Dated this 4<sup>th</sup> day of July 2025

Richard Michael Kemp

## **Appendix 1 – Submission #681**

## FORM 5

### SUBMISSION ON PROPOSED URBAN INTENSIFICATION VARIATION

#### Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council

#### Submitter Details:

Name of Submitter:

Passion Development Limited

Address for Service:

C/- Pragmatic Planning  
Attention: Richard Kemp  
[richard@pragmaticplanning.co.nz](mailto:richard@pragmaticplanning.co.nz)  
Phone: 021 104 3405

**1. This is a submission on the Proposed Urban Intensification Variation to the Queenstown Lakes Proposed District Plan.**

#### **2. Trade Competition**

The submitter could not gain an advantage in trade competition through this submission.

#### **3. Omitted**

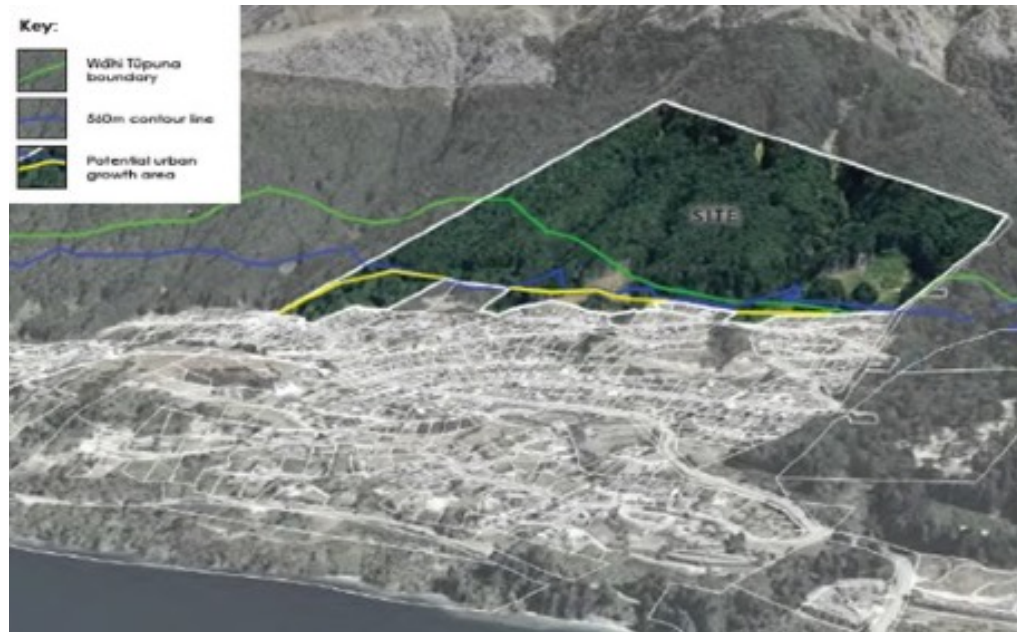
#### **4. Passion Development Limited submission is that:**

The submitter **opposes** in part the Proposed Urban Intensification Variation on the following basis:

- 4.1 Passion Development Limited owns a 56.6-hectare site directly adjacent to the existing urban area of Fernhill, legally described as Lot 1 Deposited Plan 20613 as held in Record of Title 838157. This property is shown in Figure 1 below, and will hereon be referred to as “the site”.
- 4.2 Passion Development Limited owns a number of subsidiary development companies who is and has developed housing across New Zealand, including in Queenstown. To name a few developments: Joy Valley, Orakei Gem and Jade Lake. The largest of which in Queenstown is Jade Lake (Resource consent: RM171560 & RM181942) that is currently under construction in Fernhill and will provide 80+ residential units (terrace housing and apartments) that range in size and type to meet the needs of different households [National Policy Statement on Urban Development (NPS:UD) – Policy 1]. Passion Development intends to develop similar housing typologies on the site in future.
- 4.3 Passion Development Limited has also submitted on the QLDC Spatial Plan “call for sites” and the Landscape Schedules plan variation.



4.4



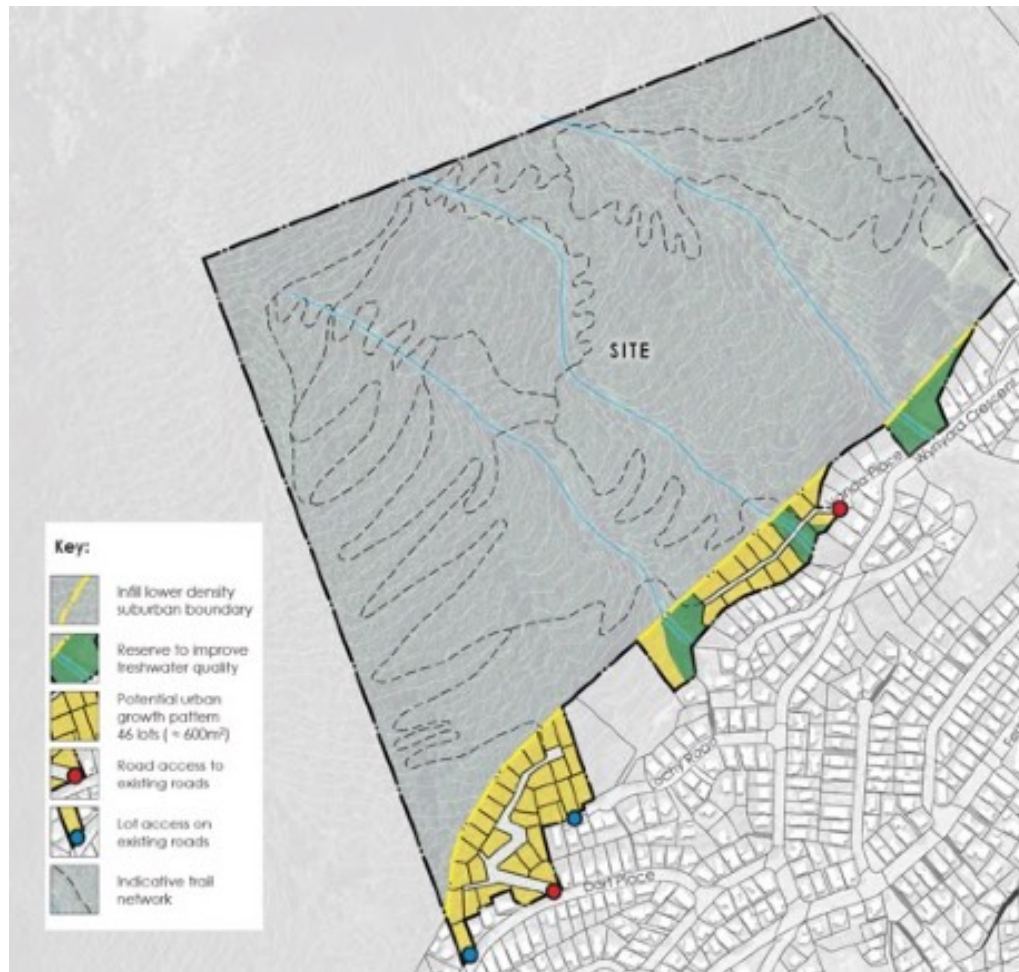
**Figure 1 – Site location in Context of Fernhill**

- 4.5 The notified Urban Intensification Variation proposes to re-zone various areas of land across the District to reflect the land's level of accessibility and relative demand, in line with Policy 5 of the NPS:UD. It also seeks to enable more attached housing typologies. It seeks to enable more infill development, to improve commercial feasibility for infill and re-development, and to deliver a range of housing typologies.
- 4.6 It is submitted that the lower extent of the site and landscape has capacity to absorb infill development (in-between the existing urban development) and provide zoned land capable of accommodating approximately 100+ residential units within a location that is already serviced by existing infrastructure. Such existing infrastructure includes Council roads and three waters services. The lower extent of the site is within an accessible location (5min walking/400m from bus stops – see Figure 2 below) and in an area of relative high demand for housing.



**Figure 2: Access locations & Distance to public bus stops**

- 4.7 Enabling urban development on the lower part of the site would align with the NPS:UD objectives and policies by seeking to align land use and infrastructure planning, enabling a range of housing typologies and will reflect the land's level of accessibility and relative demand.
- 4.8 The submitter **opposes** the retention of the Rural Zone over part of the site that has capacity for urban infill development in between existing residential-zoned lots; and seeks for the existing LDSR zone to be extended to also include parts of the site as shown in Figure 3 below (bound by the “infill lower density suburban boundary” line).



**Figure 3 – Concept plan (Conceptual)**

- 4.9 It is noted that the Council's notified methodology for the plan variation did not map the site as having a high level of accessibility, or relative high demand. It also did not include the site as it is currently located within the Rural Zone. This is addressed below.
- 4.10 The s32 report provides the rationale behind the notified zoning changes proposed by Urban Intensification Variation, being the modelling of limbs (a) and (b) of NPS:UD Policy 5<sup>1</sup> by Barker and Associates<sup>2</sup>. This modelling undertakes an Accessibility and Relative Demand Analysis. This modelling is at a high-level but has been refined to mostly focus on walkable catchments as most of the urban areas of the District are relatively easily accessible by bike and by public transport (in Queenstown).
- 4.11 It is submitted that more weight should be given to these forms of transport as it relates to the subject site so that the site's level of accessibility is recognised. The site is within a 5-min walk from public transport stops and a short travel time to the Queenstown Town Centre. It is, however, considered that even if no changes are

<sup>1</sup> QLDC Urban Intensification Section 32 Report, Section 9.1, page 55

<sup>2</sup> 'Method Statement – Accessibility & Demand Analysis – NPSUD Policy 5' by Barker and Associates, 16 May 2023

made to the methodology, the mapping already demonstrates that zoning the identified lower parts of the site to LDSR would be appropriate, as the heights and densities enabled would be commensurate with the site's level of accessibility.

- 4.12 The Barker and Associates report includes an analysis of various measures identified to contribute to 'relative demand'. The results of this bivariate analysis (Figure 17 of the report) does not include the subject site as having relatively high demand. It is submitted that more weight could be given to the property values as an indicator or measure of relative demand. Land values in Fernhill, especially properties in upper Fernhill are some of the highest in the Country and Policy 5 requires that the zoning of the land (heights and densities enabled) are commensurate with the level of relative demand.
- 4.13 It is submitted that the zoning of the land should reflect the relative high demand of the land to enable a more efficient use of the land resource in such a desirable location. It is however considered that even if no changes are made to the methodology, the mapping already demonstrates that zoning parts of the site to LDSR would be appropriate, as the heights and densities enabled would be commensurate with the site's level of relative demand for housing in that location.
- 4.14 Lastly, it is noted that the land was not included as it is currently located within the Rural Zone. It is submitted that given the high level of accessibility and relative demand (in addition to being serviced with existing infrastructure), that an exception should be made for this land to be included in the plan variation.
- 4.15 It is my understanding that the plan variation is intended to not only implement Policy 5 of the NPS:UD, but also its wider intent / directive and that all the objectives and policies of the NPS:UD should be considered.
- 4.16 In this regard it is submitted that the land is adjacent to an existing urban area that is not constrained by infrastructure or the traffic/bridge constraints referred to in the s32 report, will add significant capacity, and will enable the creation of a well-functioning urban environment as directed by the NPS:UD.
- 4.17 The NPS:UD requires that planning decisions on infrastructure provision and zoning should be aligned, as will be the case here. It also specifically (subpart 2), requires responsive planning and consideration of unanticipated or out-of-sequence developments. It states:

## **Subpart 2 – Responsive planning**

### **3.8 Unanticipated or out-of-sequence developments**

- (1) This clause applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.
- (2) Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:
  - (a) would contribute to a well-functioning urban environment; and
  - (b) is well-connected along transport corridors; and
  - (c) meets the criteria set under subclause (3); and



- 4.18 The NPS:UD needs to be considered as part of all planning decisions that affect the urban environment, including a decision on this plan variation. It does not just apply to existing urban environments, but also to planning decisions that affect an urban environment. That includes proposals for new urban environments or future urban areas as an extension, infill or addition to urban areas by which, by definition, will affect urban environments. This is prescribed by Section 1.3 of the NPS:UD which states (emphasis added in yellow highlighting):

### 1.3 Application

- (1) This National Policy Statement applies to:
- (a) all local authorities that have all or part of an urban environment within their district or region (ie, tier 1, 2 and 3 local authorities); and
  - (b) planning decisions by any local authority that affect an urban environment.

- 4.19 Given the planning decision that is to be made on this plan variation, it is relevant to consider the following objectives and policies of the NPS:UD (emphasis again added in yellow highlighting):

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) integrated with infrastructure planning and funding decisions; and
- (b) strategic over the medium term and long term; and
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.

Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.

Objective 8: New Zealand's urban environments:

- (a) support reductions in greenhouse gas emissions; and
- (b) are resilient to the current and future effects of climate change.

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
  - (i) meet the needs, in terms of type, price, and location, of different households; and
  - (ii) enable Māori to express their cultural traditions and norms; and

- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

**Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:**

- (a) unanticipated by RMA planning documents; or
- (b) out-of-sequence with planned land release.

- 4.20 The NPS:UD requires, in policy 8 specifically, that the Council be responsive to plan changes that would add significantly to capacity. It is considered that the inclusion of the identified parts of the subject site would add significantly to development capacity.
- 4.21 Extending the LDSRZ and UGB to include the Site would help meet demand for housing land and address the changes advanced by the Variation by increasing the availability of LDSRZ land in proximity to existing infrastructure, public transport networks, and commercial activities. Section 80E(1)(b) of the RMA includes scope for related provisions including rezoning of land where this supports or is consequential on the Medium Density Residential Standards (MDRS) and policies 3 and 4 of the NPS-UD. The MDRS requires inclusion of a number of objectives and policies relating to a well-functioning urban environment, which could support the rezoning of the Site. The outcome of the rezoning/extension of zoning would support the broad intent of the MDRS and NPS:UD.

## 5. Reasons for the submission

- 5.1 Extending the LDSRZ over the Site identified in this submission presents a logical and coherent extension of existing urban zoned land, which is:
- 5.1.1 consistent with the principles of future urban planning and expansion within the QLDC Spatial Plan;
  - 5.1.2 consistent with the principles of urban expansion commensurate with infrastructure and connectivity in Chapter 4 of the PDP; and
  - 5.1.3 not inconsistent with the protection of outstanding natural landscapes (chapters 3 and 6 of the PDP, and Section 6b of the Act).
- 5.2 The relief sought in this submission will better give effect to the objectives of the Variation, in particular by creating an expanded LDSRZ area to enhance feasible development capacity of residential land.

- 5.3 Extending the LDSRZ over the Rezoning Land will better meet the requirements of Policy 5 of the NPSUD as compared to the notified mapping of the Variation and current (Rural) zoning of the Rezoning Land. It will better enable development that contributes to a 'well-functioning urban environment' and is not constrained for intensification by virtue of historic heritage, natural hazards, airport operations, or other mapping features.
- 5.4 The extension of LDSRZ over the Rezoning Land seeks to satisfy Policy 5, and in turn promote a compact urban form and enable the development of a diverse range of housing typologies.

## **6. Scope for rezoning through the Variation**

- 6.1 The Variation provides scope for rezonings and up-zonings of land across the District, and in particular in the location of this Site, including because the Variation includes changes to the zoning around identified commercial areas and transport corridors across the District. This rezoning provides for intensification of an existing urban area by seeking only a small adjustment to the UGB rather than a satellite rezoning.
- 6.2 The planning maps included in the Variation are the subject of various up-zonings from LDSRZ to MDR and HDR. The Variation generally anticipates, and the objectives of the Variation seek to achieve, the intensification of zoning through PDP mapping as well as within planning provisions across the District to ensure the outcomes of housing and business zoned land supply in accordance NPS:UD are achieved. Given the broad-reaching objectives of the Variation, and the notification of the PDP planning maps, the rezoning of this land is considered to be within scope and 'on' the Variation, or at the very least, and anticipated consequential outcome. Given a number of submissions are likely to be received on the Variation in opposition to intensification in some areas (for example, Arrowtown, on the basis of 'special character'), the Council will likely need to adjust its planned capacity for intensification by reconsidering other areas more suitable for intensification and / or zoning expansion. The Variation overall should be considering which areas in the District are suitable for intensification and in light of achieving housing bottom lines over the long term.
- 6.3 The Site is adjacent with, and connected to, land that is included within the LDSRZ, within which general planning provisions of the PDP are sought to be amended. General planning provisions to be changed in this location include height limits, recession planes and density. Therefore, the receiving environment associated with the land to be re-zoned is directly influenced and affected by the Variation, and consequently, rezoning extensions are anticipated within this area.
- 6.4 The NPS:UD and Draft National Planning Framework (**NPF**) provides strong support and national direction to ensure tier 1 and 2 local authorities are providing at least sufficient development capacity for residential and business zoned land, including through responsive planning and rezoning of greenfield (as well as brownfield) land.
- 6.5 Intensification and urban extension of the Site is foreseeable by surrounding landowners and potential submitters given its proximity to the existing LDSRZ. Any person not expecting rezoning / extension of urban zoning over this land will be on notice by the Variation and notified submissions, and would be able to make a further submission opposing the relief sought by the Submitter.

6.6 The section 32 assessment for the Variation states:

*The scope of the proposed variation is limited to existing urban areas within the Proposed District Plan, which meet the requirements of Policy 5 in terms of accessibility and/or relative demand and for which changes are proposed. This aligns with the Spatial Plan which seeks to provide for growth and intensification predominantly within existing urban areas through promotion of a compact urban form.*

*A compact urban form can contribute to a well-functioning urban environment that reduces the demand for greenfield development and its adverse effects upon sensitive environments, landscape values and productive land supply as well as the inefficient expansion of infrastructure. Further, a compact urban form reduces reliance on private vehicle use; maximises the use and viability of public transport, walking and cycling; and improves the efficient operation of public utilities which will reduce energy demand and minimise greenhouse gas emissions<sup>3</sup>.*

6.7 The relief sought in this submission is consistent with the intention and 'scope' set out in the s32 report given that the Site is directly influenced and affected by the intensification of the LDSRZ through the Variation, and is effectively an existing urban area because of its connectivity to operative LDSRZ land.

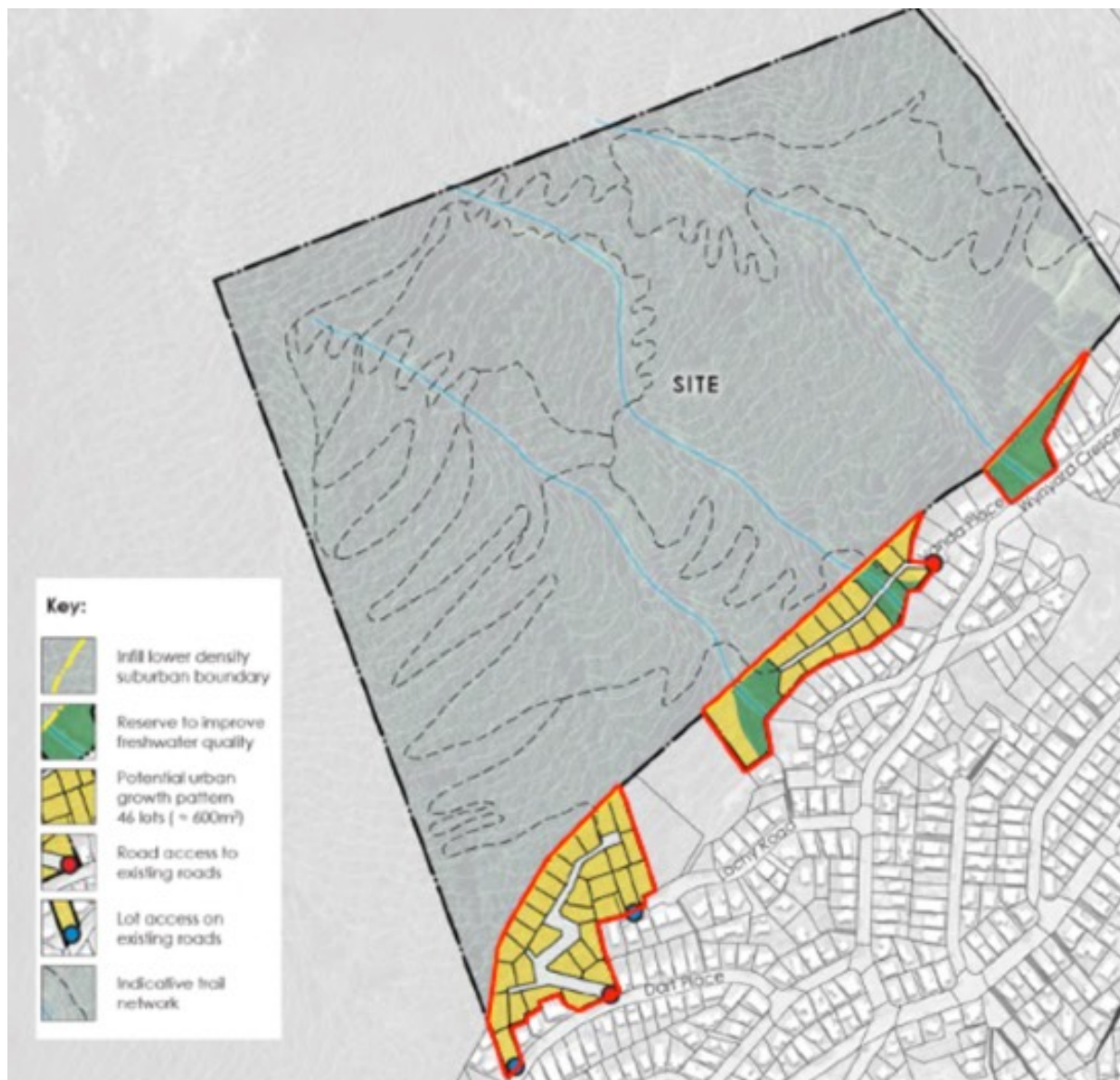
**7. The submitter seeks the following decision from the Queenstown Lakes District Council:**

- That the Lower Density Suburban Residential Zone proposed by the Urban Intensification Variation is extended to include parts of the site (Lot 1 Deposited Plan 20613) bound by the “infill lower density suburban boundary” line in Figure 3. For clarity, these are the general areas of the Site outlined in red in Figure 4 below:

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<sup>3</sup> Variation section 32 evaluation report, 16 May 2023 updated 21 August 2023, at page 5.





**Figure 4 – Areas of Site for Inclusion Within the LDSR Zone (Outlined Red)**

- That the ONL and UGB lines on the planning maps are adjusted to exclude this land to be re-zoned to the Lower Density Suburban Residential Zone.
- Any other consequential, related, or necessary relief required to give effect to the intention of this Submission including but not limited to:
  - Any alternative rezoning / extension of urban zoning over the Site, such as MDRZ or any rural living zone or special zone;
  - The application of any site-specific provisions in order to respond to specific planning constraints and opportunities for the Site, within the LDSRZ, MDRZ, and other rezoning option, and / or higher order and district-wide chapters of the PDP.

➤ The submitter also seeks such further or consequential or alternative amendments necessary to give effect to this submission, and to:

- a) promote the sustainable management of resources and achieve the purpose of the Resource Management Act 1991 ("Act") and National Policy Statement on Urban Development 2020;
- b) meet the reasonably foreseeable needs of future generations;
- c) enable social, economic and cultural wellbeing;
- d) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of other means available in terms of section 32 and other provisions of the Act.

**8. The submitter wishes to be heard in support of their submission.**

**9. If others make a similar submission the submitter will consider presenting a joint case with them at a hearing.**

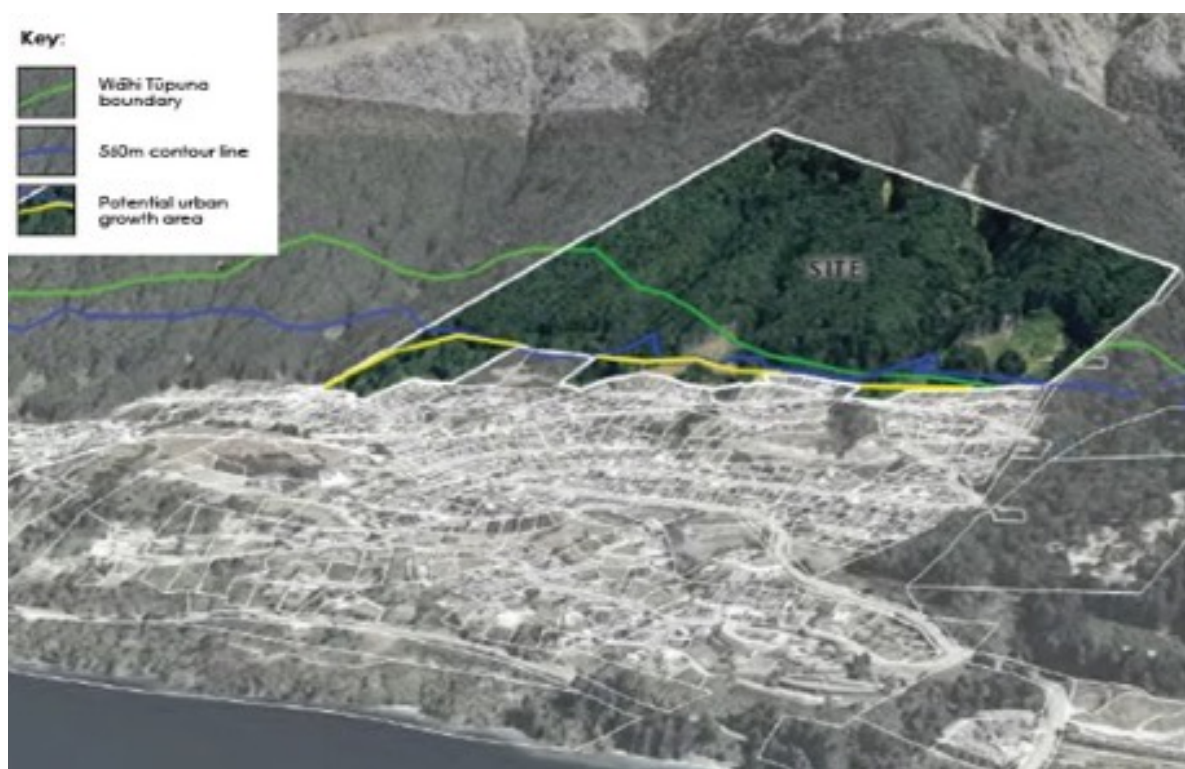
Passion Development Limited

**Dated:** 5 October 2023

## **Appendix 2 – ‘Call For Sites’ – Spatial Plan Submission of Passion Development Limited**



**Response To Call For Urban Growth Sites  
for the  
Queenstown Lakes Spatial Plan 2024  
Gen 2.0**



**For: Passion Development Limited**

**14 July 2023**

## 1. Introduction

Passion Development Limited owns a number of subsidiary development companies who is developing and has developed housing across New Zealand, including in Queenstown. To name a few developments: [Joy Valley](#), [Orakei Gem](#) and [Jade Lake](#). The largest of which in Queenstown is Jade Lake (Resource consent: RM171560 & RM181942) that is currently under construction in Fernhill. Jade Lake will provide 80+ residential units (terrace housing and apartments) that range in size and type to meet the needs of different households [National Policy Statement on Urban Development (NPS-UD) – Policy 1].

Passion Development is also the owner of a 56.6-hectare site (Lot 1 DP 20613) directly adjacent to the urban area of Fernhill and their Jade Lake development currently under construction. We are pleased to provide this report and supporting material for considering part of the site as part of the QLDC ‘call for sites’ process.

It is submitted that the site and landscape have capacity to absorb approximately 100+ residential units within a location that is already serviced by Council roads and three waters infrastructure - and that is within an accessible location (5min walking/400m from bus stops). This aligns with the NPS-UD policy 5 and Objective 6a - c.

In addition to this Overview Report we have commissioned supporting landscape comment (Attachment 1) for the Panel’s consideration. We have also submitted (Submission #186 – Attachment 2) on the QLDC’s proposed variation to Chapter 21 Rural Zone regarding the landscape schedules to highlight that the Western Whakatipu Basin landscape priority area has capacity for infill urban development adjacent to or in-between the existing zoned and partially developed urban land.

We are in the process of commissioning further work to support the urban development of part of the site, and/or to pursue a resource consent for rural building platforms in the same locations. These reports can be provided to the QLDC when completed if needed and includes:

- Indicative master plan and development concept package;
- Infrastructure / Servicing report:
  - modelling of potable water
  - modelling of wastewater; and
  - road alignments to achieve Council standards; and
- Geotechnical and hazard assessment

In summary, it is considered that part of the land is suitable for urban development and will provide a meaningful contribution to housing supply in the Queenstown Lakes District.

In particular, the Panel can include the land with confidence as a future ‘Urban Growth’ site for Queenstown. Part of the site is an ideal location to be identified as ‘Future Urban’ in the Spatial Plan, as it addresses the three principles and five spatial outcomes of the current Spatial Plan 2021.

## 2. Overview – The Site

The land is legally described as Lot 1 Deposited Plan 20613 as held in Record of Title 838157 (Attachment 3) and is directly adjacent to the north of the existing urban area of Fernhill. The land measures 56.6-hectare and is mostly covered in Douglas Fir canopy with 3 intermittent streams traversing through the site down toward Fernhill/Lake Wakatipu.



**Figure 1: Site location**

The southern site boundary follows the irregular Urban Growth Boundary (UGB) with Low Density Suburban Residential (LDSR) zoned land along it. Some of the LDSR land is yet to be developed with large sites extending up in the middle of the subject site to the 560m contour line. The site has road access in five locations along this boundary. The eastern boundary adjoins a QLDC-owned unformed legal road that is partially gravelled up to a Council water reservoir that stores potable water for Fernhill. The northern and eastern boundary extends far up the slope of Ben Lomond and ends near where the Douglas fir forest ends. The elevated slopes above the site comprises the remainder of Mt Ben Lomond.

Further to the east of the site is Informal Recreation zoned land that includes the Wynyard Jump Park and various walking and cycling tracks that traverse up towards Bob's Peak (Skyline Gondola) in the Ben Lomond Reserve and up towards Ben Lomond Peak. There is also a track that goes down towards Queenstown via the One Mile roundabout.

The site features three large areas with road access below the 560m contour land in between the existing LDSR zoned land that is partially developed. These areas are considered suitable for residential development and provides amazing views towards Lake Wakatipu.

Please see the Concept Package attached to the landscape report (Attachment 1) for more graphics that outlines the site context.

### **3. Background**

The site used to extend into the Urban Area of Fernhill to include the Jade Lake development site, but it was subsequently subdivided off during the initial stages of Jade Lake.

Unfortunately, the developer was unaware of the Stage 1 District Plan review process where they could have submitted to zone the land that is suitable for urban development to the LDSR



zone, and to re-align the Urban Growth Boundary (UGB) and the Outstanding Natural Landscape Line – both to reflect the landscape’s ability to absorb urban development.

It is considered that the whole site is therefore still classified as ONL and that the ONL line currently does not reflect the landscape’s ability to absorb urban development as it is simply following the UGB (based off cadastral boundaries) and not any landscape features or vegetation patterns.

It is noted that during Stage 1 and Stage 3 of the District Plan review process that the ONL line and UGB was adjusted in many places across the district to more accurately reflect the landscapes’ ability to absorb development and to follow landscape features and vegetation patterns instead of just simply following the UGB/cadastral boundaries.

A submission was previously made on the QLDC’s proposed variation to Chapter 21 Rural Zone regarding the landscape schedules to highlight that the Western Whakatipu Basin landscape priority area has capacity for infill urban development adjacent to or in-between the existing zoned and partially developed urban land.

It is also noted that the land is in a very accessible location and is in a location where the relative demand for housing is high (NPS-UD – Policy 5). The land also already has formed physical and legal access and can easily be serviced by existing infrastructure (NPS-UD – Objective 6 a - c). The landowner will therefore also be submitting on the QLDC’s Urban Intensification variation to include rezoning part of this land.

#### **4. Suitability of land for urban development**

##### **Landscape assessment**

A landscape assessment (Attachment 1) has been commissioned from Patch (a locally-based Landscape Architecture Consultancy) that considers the landscape and visual effects of the proposed change of zone and urbanisation of part of the site below the 560m contour line. The assessment concludes that parts of the site have the potential to absorb appropriately designed urban infill type development.

It sets out two potential areas and boundaries where there is landscape justification to locate future urban development. It explains that these two boundaries follow both the existing urban patterning of the landscape, as well as the 560m contour line.

The assessment includes a detailed consideration of the notified landscape schedule for the area and includes a series of analysis and design graphics which demonstrate the effect urban infill type development may have on the wider landscape. The assessment concludes that urban infill type development, confined to these existing development standards, would not act to adversely affect landscape or visual amenity values, would maintain the attributes and values of the much broader ONL and could, to a degree enhance the attributes and values.

##### **Three Waters Servicing and Infrastructure**

The subject site adjoins the existing urban area of Fernhill and has existing access to sealed roads and servicing in five locations along the southern boundary of the site.

While a detailed analysis of the existing three waters infrastructure has not yet been undertaken, it is not considered that capacity of the infrastructure and ability to service the site would be a barrier to development.

The site adjoins an existing urban area and it would be able to connect into the potable water, and stormwater infrastructure that already services the adjoining LDSR zoned land. The Developer has previously undertaken detailed assessments of this to service the large Jade Lake Development that was at the lower slopes of the subject site (before being subdivided off) and the analysis showed that there is adequate existing servicing capacity.

It is also noted that QLDC has recently endorsed the intensification of the whole Fernhill area and broader urban area which will more than double the potential capacity of the existing urban area and the reporting considered that there is enough capacity to service that capacity via existing infrastructure of future upgrades. There should therefore be no constraints to service the site.

There are no anticipated issues with providing electricity and telecommunications supplies given the location adjacent to an existing urban area.

## **Transport**

The subject site has existing access to sealed roads in five locations along the southern boundary of the site (shown with blue dots below). Physical and legal access exists from Wynyard Crescent, Vanda Place, Lochy Road and two locations on Dart Place. This is shown on the concept plans in Attachment 1 and in Figure 2 below.

A detailed transport review has not yet been undertaken. However, the concept subdivision layout designs (Attachment 1) demonstrate that the development can be accessed from these locations and where roads need to be formed that there is sufficient space to construct roads that complies with Council standards.





**Figure 2: Access locations & Distance to public bus stops**

Lastly, in reference to QLDC's mode shift plan and the NPS-UD it is noted that the areas of the subject site where urban development is proposed is within the crucial 5-minute walk of existing public transport routes, specifically the high-frequency number 1 route from Fernhill to Remarkables Park. This will help facilitate modal shift.

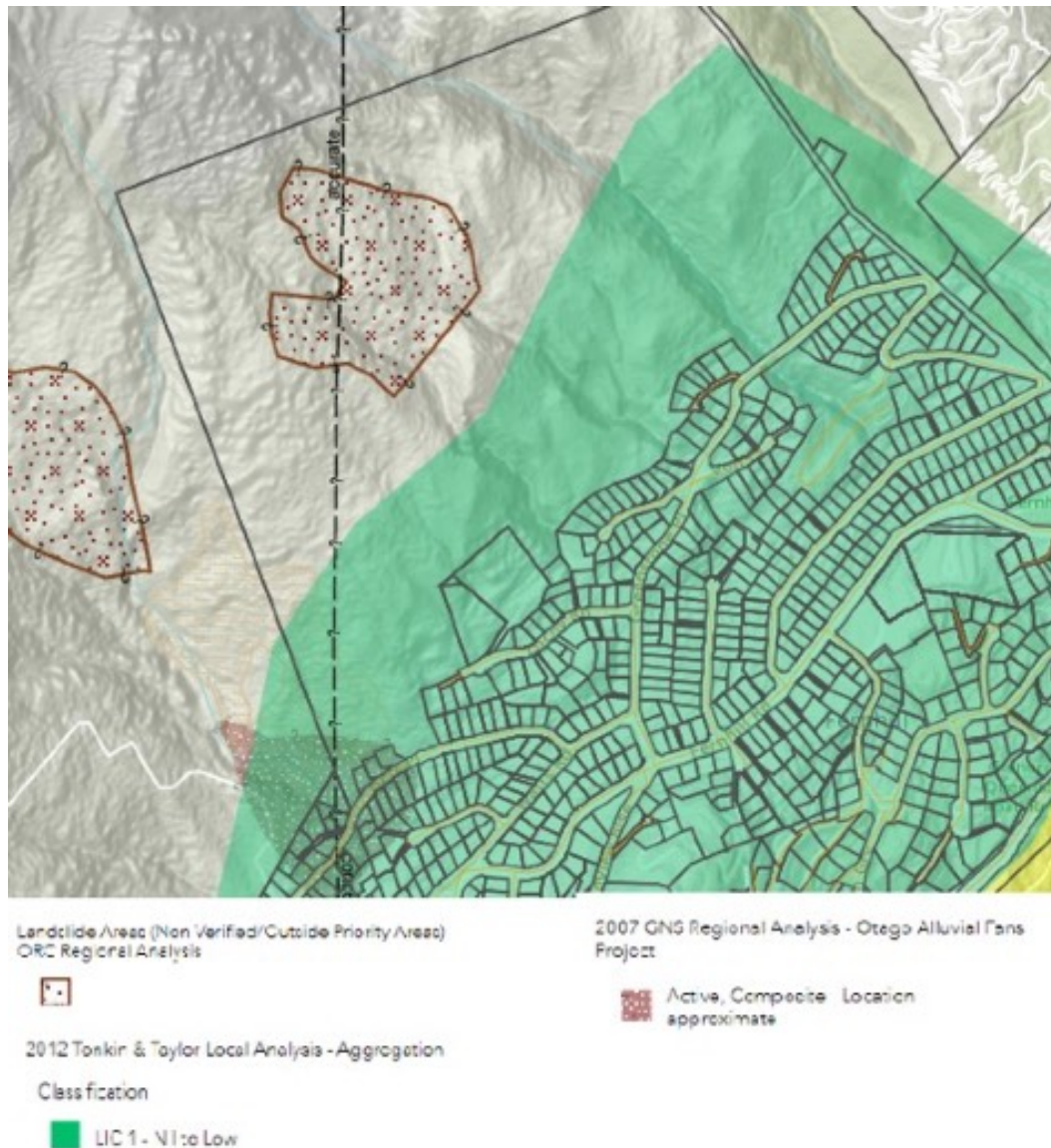
## **Hazards**

A review of the Council's Hazard database shows that the areas of the site that is proposed for urban development (see Attachment 1 concept plans) is not subject to any significant natural hazards that raise concern.

The liquefaction risk is shown as *nil-to-low* and a very small part of the site includes an alluvial fan hazard. For context, as seen in Figure 3 below, the *nil-to-low* liquefaction risk category covers almost the entire urban Fernhill and Council's previous practice has been that no further assessment is required for this lowest risk category.

The alluvial fan hazard is concentrated to a gully on the site and comprises a very small percentage of the developable area. As part of the usual subdivision and development process, a detailed assessment of all natural hazards and any mitigation measures required would be undertaken prior to being resource consented by Council.

Overall, it is anticipated that the presence of known natural hazards on the site would not place an undue hindrance on the partial urban development of the site as shown on the concept plans.



**Figure 3: QLDC Hazard layer**

### **Cultural values**

The areas of the site that are identified as suitable for urban development are not contained within any Wāhi Tūpuna areas in the Proposed District Plan. There are also no specific annotations identifying the site in the Ngai Tahu Cultural Atlas. <https://www.kahurumanu.co.nz/atlas>

### **Ecological**

There are no known important ecological features / vegetation types on the site. The site is currently almost completely covered in exotic Douglas fir forest. These vegetation types are a well-documented biodiversity problem.

The proposal would see the removal of this exotic forest cover in parts of the site, including those associated with any gully enhancement areas. Areas next to streams will be set aside for enhancement with native vegetation as is the case with the Jade Lake Development below the site.

This will help improve the ecology of the site, the health of the streams and the freshwater quality flowing to Lake Wakatipu.

## **5. Assessment against Spatial Plan 2021 – Principles**

The Spatial Plan 2021 contains three principles and five spatial outcomes that guide the direction of the Spatial Plan to 'Grow Well / Whaiora' and address the challenges and opportunities facing the Queenstown Lakes District.

The proposal is assessed against these Principles and Outcomes below:

### **1. Principle – Wellbeing Hauoraw**

*Decisions about growth recognise social, economic, environmental and cultural considerations*

The proposed locations for future urban development will take into account various social, economic, environmental, and cultural factors. In summary:

- Socially, the land provides an opportunity for people to meet their social needs by creating suitable homes for families in a desirable location.
- Economically, the land allows for additional housing in the Queenstown market, which is known for its high unaffordability.
- Environmentally, the impact of urban development in this area can be effectively managed by implementing appropriate infrastructure measures, removing non-native forest cover, and enhancing gully areas with indigenous vegetation.
- Culturally, the site is not recognized as a Wāhi Tūpuna area in the PDP and is not listed in the Ngai Tahu cultural atlas.

### **2. Principle – Resilience Aumangea**

*Ensuring communities and visitors are resilient to shocks of the future, including adapting to climate change*

In line with this objective, we emphasize the importance of providing additional housing supply, particularly focusing on a range of housing typologies/sizes previously delivered by this developer.

Additionally, our focus extends to promoting active transport options, such as walking and cycling infrastructure, which contribute to the overall resilience of communities and enhance their ability to adapt to the challenges posed by climate change.

### **3. Principle – Sustainability Whakauku**

*Programmes and activities are delivered according to sustainable development principles and work towards zero emissions*

Expanding the urban area of Fernhill onto this specific land presents a more sustainable approach compared to alternative greenfield locations suggested in the Spatial Plan. Unlike those distant areas that are situated far from Queenstown Town Centre and burdened by heavily congested transportation routes, this site offers a closer proximity.

Moreover, it is conveniently positioned within a 5-minute walking distance from a vital and frequently serviced public transport route (Number 1 route: Fernhill-Sunshine Bay).

Furthermore, as part of the proposal, there are plans to remove non-native forests and introduce enhanced vegetation along the streams.

## **6. Assessment against the Spatial Plan 2021 – Outcomes**

### **1. Outcome – Consolidated growth and more housing choice**

The site presents a logical and coherent expansion to the urban area of Fernhill. This strategic decision prioritizes the consolidation of the existing urban area in Queenstown, as opposed to considering remote greenfield locations like Ladies Mile or the southern corridor.

The selected site is particularly suitable for various housing typologies, aligning with the current zoning framework (LDSR Zone). The Council's Urban Intensification variation aims to further update this framework, facilitating the development of additional housing within the area.

By providing for urban development on the identified portion of the site, we not only contribute to the housing supply but also foster the consolidation of growth. It is worth noting that enabling a diverse range of housing sizes and typologies enhances the available housing choices within Queenstown, catering to the diverse needs of the community.

### **2. Outcome – Public transport, walking and cycling is the preferred option for daily travel**

The site enables a 3.1km bike ride to Queenstown town centre in 10 minutes, and a 5-minute walk to existing public transport routes. The site also borders the Ben Lomond reserve which has walking and biking trails throughout.

### **3. Outcome – A sustainable tourism system**

This outcome does not directly relate to the proposal, which is a residential development.

### **4. Outcome – Well-designed neighbourhoods that provide for everyday needs**

The indicative concept plans (Attachment 1) shows that there is adequate space to design residential development that will link in with the surrounding Fernhill neighbourhood to provided for everyday needs. A future design of development will be subject to the District Plan rules, residential / subdivision design guides – and assessed by Council through the resource consent process.

### **5. Outcome – A diverse economy where everyone can thrive**

The proposal will provide a range of housing options in an accessible location with high demand for housing. This will enable more people to live in a location that is within an existing urban area with easy access to facilities and services to meet their day to day needs so that everyone can thrive.

Overall, the identification of the land for urban expansion is consistent with the identified outcomes for the Spatial plan.



## 7. Assessment against Spatial Plan 2021 – Strategies

### 1. Strategies to achieve the Outcomes:

Strategies	Assessment
1. Increase density in appropriate locations	Fernhill is an appropriate location for low to medium density residential housing and can provide for housing typologies not well catered for the surrounding area, other than within the Jade Lake site currently under construction. The site is a few minutes' drive from the Queenstown Town Centre, or just a 3.1km (10 minute) bike ride.
2. Deliver responsive and cost-effective infrastructure	The site can be fully serviced by extensions to the existing QLDC and private infrastructure which is located directly adjacent to the site.
3. Improve housing diversity and choice	The proposal can provide a mix of typologies/densities, especially if the LDSR zone development standards are relaxed through the Urban Intensification Variation. The developer has a track record of developing a mix of housing typologies and aims to do the same on this site to improve housing diversity and choice.
4. Provide more affordable housing options	The developer aims to provide a mix of typologies/densities, including smaller household units which will be more affordable.
5. Ensure land use is concentrated, mixed and integrated with transport	The site is a logical urban extension to Fernhill and is located within a 5-minute walk of existing bus routes.
6. Coordinate a programme of travel demand initiatives	Not relevant to the subject site.
7. Prioritise investment in public transport and active mode networks	The recognition of the site as a Future Urban area serves to enhance public transportation by strategically increasing density in close proximity to the Fernhill-Sunshine Bay Number 1 bus route.
8. Improve coordination across the tourism system	Not relevant to the subject site.
9. Ensure infrastructure supports a great visitor experience	Not relevant to the subject site.
10. Promote a car free destination	Not relevant to the subject site.
11. Create well-connected neighbourhoods for healthy communities	The site is well connected to the existing Fernhill urban area, existing public transport and walking and cycling trails that connect it to central Queenstown.
12. Design to grow well	Future development will be subject to the QLDC residential and subdivision design guidelines that will ensure that the future urban areas will be a quality urban environment.
13. Enhance and protect the Blue-Green Network	The proposal will include the enhancement of the stream corridors with native planting and removal of exotic plants which will help enhance the Blue-Green Network.
14. Diversify the economy	Not relevant.
15. Make spaces for business success	Not relevant.
16. Establish efficient and resilient connections	The proposal will build on existing connections and improve their resilience through more patronage.

Overall, it is considered that the identification of the subject site for Urban infill development would align with the strategies in the Spatial Plan identified to achieve the outcomes.

It is worth noting that all the land specified in the existing Spatial Plan as 'Future Urban' is situated at Ladies Mile, Homestead Bay, or on the other side of the Kawarau River from Remarkables Park. These areas heavily rely on two road corridors and face limitations due to the existing bridge capacities, culminating at the SH6/6A intersection near the BP roundabout. Addressing these constraints would necessitate a substantial shift in transportation modes and enhancements in the provision of public transport and/or extensive physical transport interventions.

The subject site, however, presents a valuable opportunity to contribute to the housing supply in close proximity to the Queenstown CBD, without introducing additional commuter traffic during peak hours onto these two routes.

Given these factors, it is recommended to classify the land as 'Future Urban' in the next iteration of the Spatial Plan and the Future Development Strategy.

## **8. Summary**

The inclusion of the northern portion of Fernhill land (part of the subject site) as a 'Future Urban Area' as stated in this submission, aligns with the principles and outcomes of the Spatial Plan 2021. This decision will reflect a strategic and cohesive approach to managing growth.

The landscape assessment confirms that the landscape has the capacity to accommodate this urban infill/expansion and is deemed suitable for residential development in the specified areas. Moreover, the site can significantly contribute to the residential housing supply in the Queenstown market. Notably, the site is conveniently positioned, with a mere 3.1km bike ride (approximately 10 minutes) to reach Queenstown town centre and a short 5-minute walk to existing public transport routes.

The site is suitable for either LDSR or MDR zoning and can enable the development of a range of housing typologies and will help enable a well-functioning urban environment as required by the NPS-UD.

Overall, the site is a logical urban extension to the Fernhill urban area that can be readily serviced with infrastructure and provide a meaningful supply to housing to the severely unaffordable Queenstown housing market.

We respectfully request the site be identified as a 'Future Urban' area in Gen 2 of the Spatial Plan. We would welcome the opportunity to speak to this submission at any hearing, and/or to supply further expert evidence as required.



**Richard Kemp**

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Pragmatic Planning  
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## **Attachments**

- Attachment 1 – Landscape Comment
- Attachment 2 - Submission #186 - Landscape Schedules
- Attachment 3 – Record of Title

# Attachment 1 – Landscape Comment



## LANDSCAPE MEMO – Urban Development – Wynyard Crescent – Fernhill

13 July 2023

### INTRODUCTION

1. This memo provides landscape and urban design comment regarding a submission to Queenstown Lakes District Council's Spatial Plan 2024 Gen. 2.0 – Call for urban growth sites. The subject site is 56.6 hectares in area and occupies much of the forested hill slopes to the north of and above the urban area known as Fernhill in Queenstown. The legal description of the site is Lot 1 DP 20613
2. Patch has prepared a series of analyses and design graphics which are attached and will be referred to throughout this memo. The analysis graphics set out:
  - A. the existing urban growth boundary (UGB),
  - B. the Wāhi Tūpuna line,
  - C. the existing zoning,
  - D. the Outstanding Natural Landscape (ONL) boundary and contours,
  - E. a plan setting out the existing development standards,
  - F -L indicative design layers which project future development of the potential urban area.



## ASSESSMENT CONTEXT

3. The design layers listed above and contained within the attached supporting graphics are rooted in a high-level assessment of the proposal which is based on landscape and urban assessment imperatives and statutory context. Those include:
  - Part 21.21.1 of the Proposed District Plan derived from *Decision No. [2023] NZEnvC 58 – Appendix A – Part 4, 21 Rural for Outstanding Natural Features and Outstanding Natural Landscapes (ONF and ONL), and*
  - The notified Schedule of Landscape Values: Outstanding Natural Landscapes Priority Areas 21.22.12 – Western Whakatipu Basin ONL.
4. The high-level assessment below is prepared in the frame of the New Zealand Institute of Landscape Architects (NZILA) *Te Tangi a Te Manu Aotearora New Zealand Landscape Assessment Guidelines*, July 2022.

### PROPOSED DISTRICT PLAN – PART 21.21.1 – ONLS AND ONFS

5. This part of the PDP was derived from the Environment Court's decision in 2023 with significant reference to Chapter 3 and Chapter 6 of the PDP and the landscape schedules which are currently notified and subject to submissions, hearings and likely appeals. Part 21.21.1 of the PDP ensures regard is given to the landscape schedules and the values identified and to what extent any proposal will protect Tangata Whenua values. This part will be discussed in further detail below.

#### *Summary – Part 21.21.2*

6. Part 21.21.2 of the PDP seeks to consider visibility and whether any parts of a proposal will detract from public or private views of and within ONLs or ONFs, whether they're mitigation is provided and if that mitigation is in keeping with the protection of landscape values. Assessment of effects on ridges, hills and slopes, lighting, earthworks and landscaping are all considered. This part of the PDP gives regard to open space and open character and seeks to maintain open space and open character as viewed from public roads and public places and ensure development is not within a broadly visible expanse of open landscape as viewed from public roads or public places. This part of the PDP also seeks to consider development's effects on open space and open character on the surrounding landscape and to contain development within areas defined by natural elements. This part of the PDP also seeks to

ensure development does not contribute to adverse cumulative effects on landscape values identified in the landscape schedules by introducing significant adverse visual effects.

*Assessment – Part 21.21.2*

7. The indicative proposed urban design extension above Fernhill and Sunshine Bay would not occur on any prominent hills, slopes or ridges. Lighting and earthworks would be viewed in conjunction with the existing urban areas and would not extend beyond a natural line in the landscape. This proposed extension of urban areas would not be in a broadly visible expanse of open landscape and would not act to noticeably reduce any openness or open character of the much broader south facing slopes of Ben Lomond. Design would largely be defined by natural elements such as the gullies or the edge of existing urban areas. The proposal would not contribute to significant or adverse cumulative effects on landscape values which will be discussed further below under the landscape schedule assessment.

*Summary – Part 21.21.3*

8. Part 21.21.3 of the PDP seeks to ensure that future development is designed in response to the identified landscape values and built development is aggregated to utilize common access ways and to cluster areas of development where parts of the landscape least sensitive to change. It seeks to ensure boundaries will not give rise to artificial or unnatural lines in the landscape and that the design and development does not contribute to adverse cumulative effects on landscape values.

*Assessment – Part 21.21.3*

9. Indicative proposals as set out in **Attachments E – M** seeks to infill urban development within areas where that urban development immediately abuts an ONL. This infill type development will see a very small extension of the existing urban area into parts of the ONL which are already affected by that urban development. Any future development within this area would be aggregated and will utilize a common accessways. It would appear as a clustered urban development in a part of the landscape which is least sensitive to change. We have derived two potential, legible, logical and justified lines (refer to **Attachment E** – Potential Urban Growth Area and 560m contour line) which we consider would not give rise to artificial or unnatural lines in the landscape. It is considered that this infill type urban development would not contribute to adverse cumulative effects on landscape values which will be discussed further below under the landscape schedule assessment.

#### *Summary – Part 21.21.4*

10. This part of the PDP considers methodology and how that methodology is applied in the consideration of cumulative effects on landscape values. It also seeks to arrive at an outcome of an assessment of landscape capacity in accordance with SP 3.3.29 and SP 3.3.45. This part of the plan requires an assessor to consider existing, consented or permitted subdivision or development and how those address landscape capacity as well as the effects of proposal would have on landscape values and landscape capacity.

#### *Assessment – Part 21.21.4*

11. In terms of assessment methodology, most landscape architects are now adhering to the assessment guidelines which were prepared by the New Zealand Institute of Landscape Architects. A consistent assessment methodology is used throughout the profession. That assessment methodology applies measurable spatial and other indicators to inform conclusions and then accounts for effects and how they may influence visual and landscape values. With regard to existing consented and permitted subdivision and development in the Fernhill /Sunshine Bay Area, it is considered that the proposal will read and as infill in an insignificant part of the adjacent rural lands and that the infill will not exceed the landscapes capacity to absorb change.

#### **LANDSCAPE SCHEDULES – 21.22.12 WESTERN WHAKATIPU BASIN ONL**

12. We have undertaken a review of the text contained under the Western Whakatipu Basin ONL (WWB-ONL) and provide the following comment.

#### *Important landforms and land types*

13. The schedule lists several important landforms and land types, very few of which address any part of the site or its immediate adjacent landscape. The WWB-ONL is a large landscape and takes in much of the wider hills and mountains which enclose the Queenstown area. The proposal would not act to have any effect on the important landforms and land types listed in the schedule.

#### *Important hydrological features*

14. The landscape schedules refer to a series of unnamed streams on either side of One Mile Creek network, draining directly to Lake Wakatipu as well as numerous unnamed streams draining the southern and eastern sides of Bowen Peak. These hydrological features generally refer to the gullies which run through the site and then through the urban areas of Fernhill and Sunshine Bay. Any proposal for future development in the proposed area could result in significant enhancements of these hydrological features through the clearing of wilding conifers within their gully type landforms and the enhancement of those water features through naturalistic, indigenous planting (refer **Attachments G-J**).

#### *Important ecological features and vegetation types*

15. The site does not hold any noteworthy indigenous vegetation features and is only referred to under the subject matter '*other distinctive vegetation types*' in which the schedule describes the almost continuous patterning of plantation Douglas fir forest throughout the mid and lower flanks of Ben Lomond and the southern flanks of Bowen Peak. These vegetation types are not particularly aesthetic or memorable and are a biodiversity problem. The proposal would likely see the removal of this exotic forest cover in parts of the site, including those associated with any gully enhancement areas.

#### *Important land use patterns and feature*

16. The schedule nods to the proliferation of wilding conifers across the urban interface, as well as the gondola and other facilities associated with the gondola. Other important land use patterns and features which are discussed in the landscape schedule include this series of trail networks which are used for recreation. The landscape schedule notes an absence of rural and rural living buildings and highlights that urban residential and commercial development adjoining the southern edge of the area and its associated recreation features are important parts of the landscape. The proposed urban development areas would seek to enhance the land use patterns particularly those associated with recreation values (refer to indicative trial networks on **Attachments G and I**).

#### *Important archaeological and heritage features and other locations*

17. The site does not have any important archaeological or heritage features.

*Mana whenua features and their locations*

18. The schedule notes that the entire area is ancestral land to Kai Tahu and is significant. It notes much of the ONL is mapped as Wahi Tupuna. That mapping is shown in **Attachments B and E**. No part of any infill development would occur within the Wahi Tupuna mapped area.

*Important shared and recognized attributes and values*

19. This part of the landscape schedule refers to parts of the landscape which are significant in terms of cultural understanding. Those include many photographs of the landscape including those from the gondola and postcard views as well as the identity of Bowen Peak. It is worth noting that the Fernhill/Sunshine Bay area is not part of these more memorable images. It is considered that any proposed infill urban development would not result in adverse effects on shared and recognized attributes and values of the ONL.

*Important recreation attributes and values*

20. The schedule lists the multitude of recreational opportunities which are available within the landscape. An urban-type development within the proposed locations could be accompanied by enhancements to the existing trail network (**Attachments G and I**) and other recreational facilities which could be enjoyed by the public.

*Legibility and expressiveness attributes and values*

21. This deals particularly with natural landforms, land type and hydrological features as well as indigenous gully and wetland plantings. While the site does not contain any important land types, it does hold some significant gully landforms which could benefit from indigenous gully and wetland plantings and weed clearance which would reinforce the legibility and expressiveness of those features (**Attachments G-J**).

*Particularly important views to and from the area*

22. This part of the landscape schedule lists in detail significant views to and from the landscape. None of those important views are noted to contain the subject site, except where the schedule refers to engaging mid to long range views from Queenstown, Fernhill and Sunshine Bay where the largely forested slopes of Ben Lomond form the backdrop of Queenstown. The schedules go on to say that the bold contrast between urban development throughout the lower flanks of the hill and the elevated wooded slopes is memorable and of importance to

identity of Queenstown as a settlement tucked into the base of a mountain. The proposal will not act to change any of this visual amenity) and if developed the landscape would continue to form the importance of this identity of Queenstown as a settlement tucked into the base of a mountain (refer to **Attachments K-M**).

#### *Naturalness attributes and values*

23. Most of what is described under this heading in the landscape schedules is not relevant to the site. However, one paragraph describes the forestry plantings across the south flanks of Ben Lomond and parts of Bowen Peak. This part of the landscape schedule considers that those plantations contribute to a reduced perception of naturalness. It goes on to say that the visual appearance of these parts of the landscape during and after harvesting cycles forms a prominent negative visual element within the broader landscape setting and serves to temporarily further reduce perception of naturalness in this part of the landscape. It is our opinion that while the existing forested cover of the site is not native forest, it does contribute to naturalness as viewed through the lens of a visitor. While from an ecological perspective it would be beneficial to clear this area of its wilding conifers, in terms of this urban infill type development, no wide scale clearance of conifers would be considered.

#### *Memorability attributes and values*

24. Again, the landscape schedule discusses the juxtaposition of the mountains and landforms within the larger urban context. It goes on to discuss the close-up experience of the alpine setting which is adjacent to the urban areas and is highly accessible. It discusses the sense of Queenstown as a place tucked into a majestic mountain setting. The proposed urban development area would not act to change any of these memorability attributes and values.

#### *Transient attributes and values*

25. The proposed urban development area would not act to change any transient attributes and values as set out in the schedule.

#### *Remoteness and wildness attributes and values*

26. The proposed urban area would not act to change any remoteness and wildness attributes and values as set out in the schedule.

### *Aesthetic qualities and values*

27. The schedule again describes the mountain landforms juxtaposed beside an urban context and describes the large scale and dramatic character of the mountain landforms and sculpted peaks which form the backdrop to Queenstown as well as the sculpted peaks. However, much of the aesthetic qualities and values which are listed in the landscape schedule are not particularly relevant to the site. As discussed above, any urban infill would not act to change or adversely affect the described juxtaposition of urban and wild lands and would result in no adverse effects on the ONL peaks or their dramatic character (refer to **Attachments K-M**).

### *Landscape capacity*

28. These schedules make assumptions on the landscape capacity for certain types of activity noting that some commercial and recreational activities may be absorbed. However, the schedules have considered that no urban expansion should occur within the landscape priority area. This part of the schedule, and in fact the whole of the schedule, is subject to a future submission and hearing process. It is anticipated that the use of the word no will be struck from the schedules and that a more fluid term such as limited is likely to be in its place. It is considered that appropriate, urban infill type development of the site would be appropriate and would not exceed the landscape's capacity to absorb change.

## **CONCLUSION**

29. Overall, it is considered that parts of the site have the potential to absorb appropriately designed urban infill type development. Our analysis has set out two potential areas and boundaries where there is landscape justification to locate future urban development. These two boundaries follow both the existing urban patterning of the landscape as well as the 560m contour line.

30. We have set out a series of analysis and design graphics which demonstrate the effect urban infill type development may have on the wider landscape. It is our assessment that urban infill type development, confined to these existing development standards, would not act to adversely affect landscape or visual amenity values, would maintain the attributes and values of the much broader ONL and could, to a degree enhance the attributes and values.

Prepared by:

Steve Skelton



Registered Landscape Architect

Director, Patch Ltd

Reviewed by:

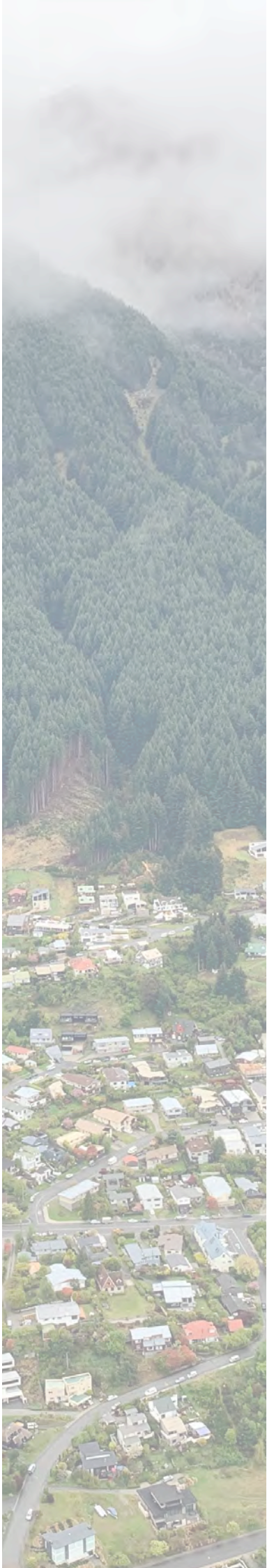
Jessica Zuban



Landscape Architecture Associate







# WYNYARD CRESCENT

FERNHILL

Concept Package

13 July 2023





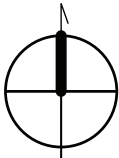
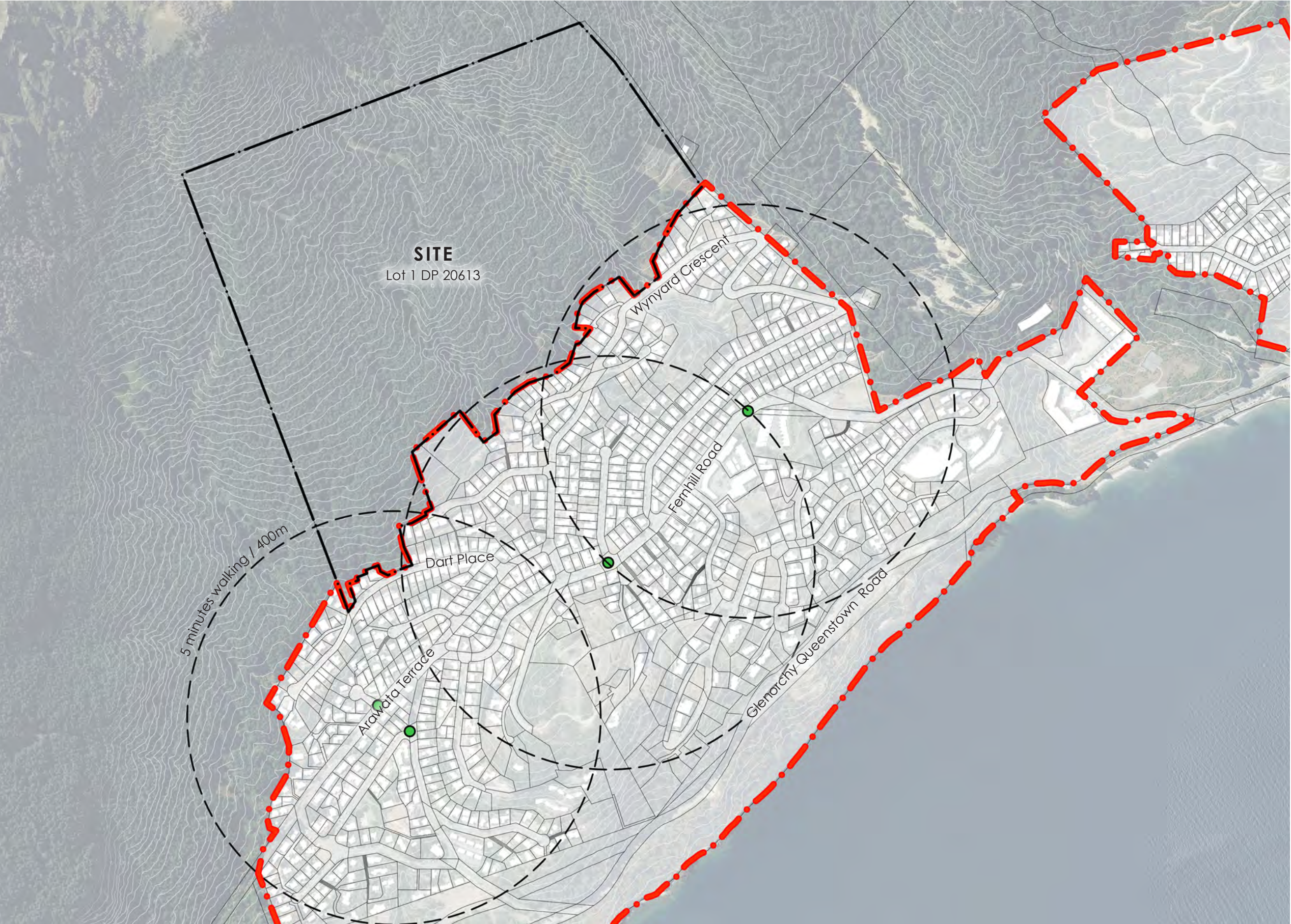
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Urban Growth Boundary



Bus stop

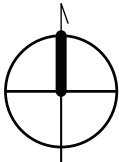




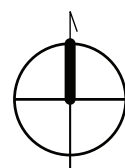
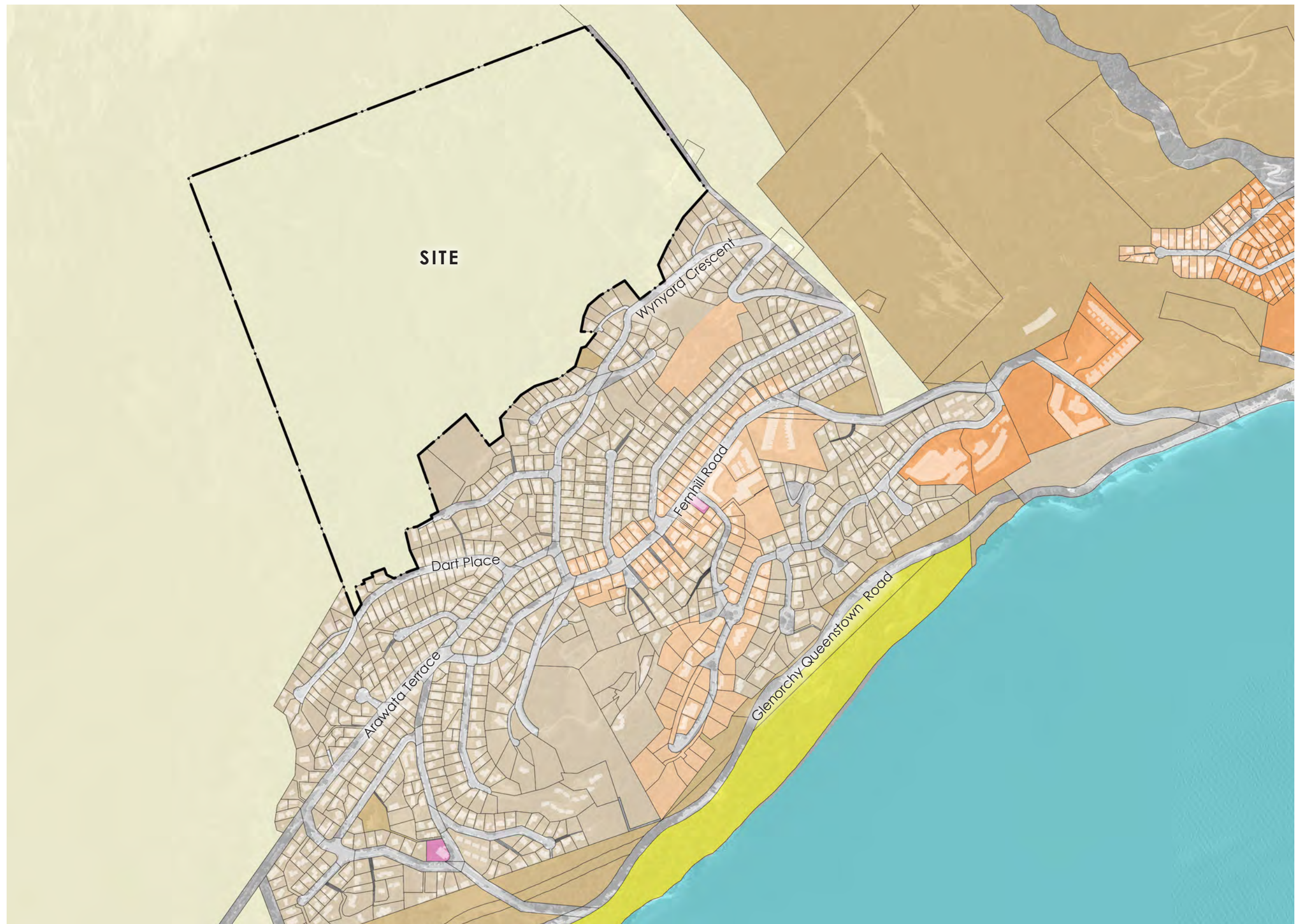
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Wāhi Tūpuna  
boundary





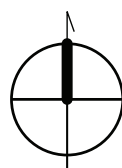
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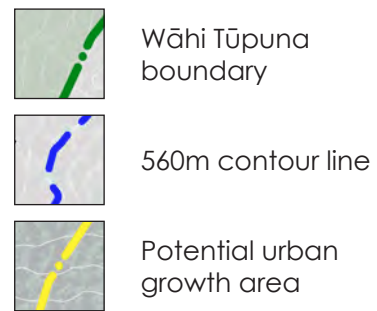
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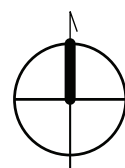
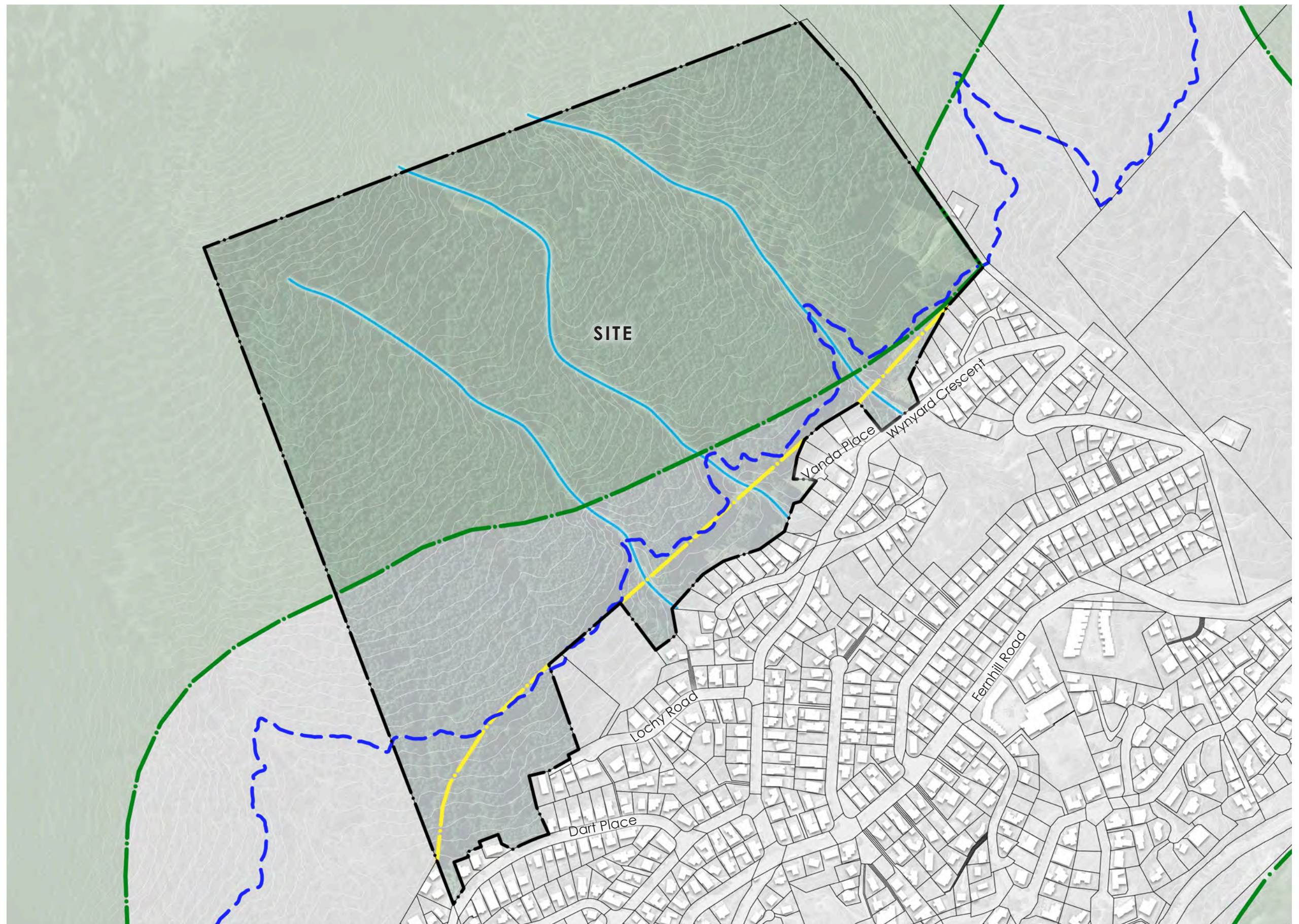
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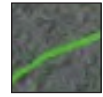


**Key:****Site Areas:**

Total site area (ONL):	56.68 ha
Outside Wāhi Tūpuna:	15.52 ha
Below 560m:	6.96 ha
Potential urban growth area:	4.66 ha





**Key:**

Wāhi Tūpuna  
boundary



560m contour line



Potential urban  
growth area

**Site Areas:**

Total site area (ONL): 56.68 ha







Outside Wāhi Tūpuna: 15.52 ha

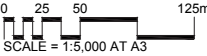
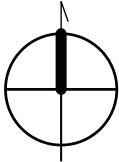
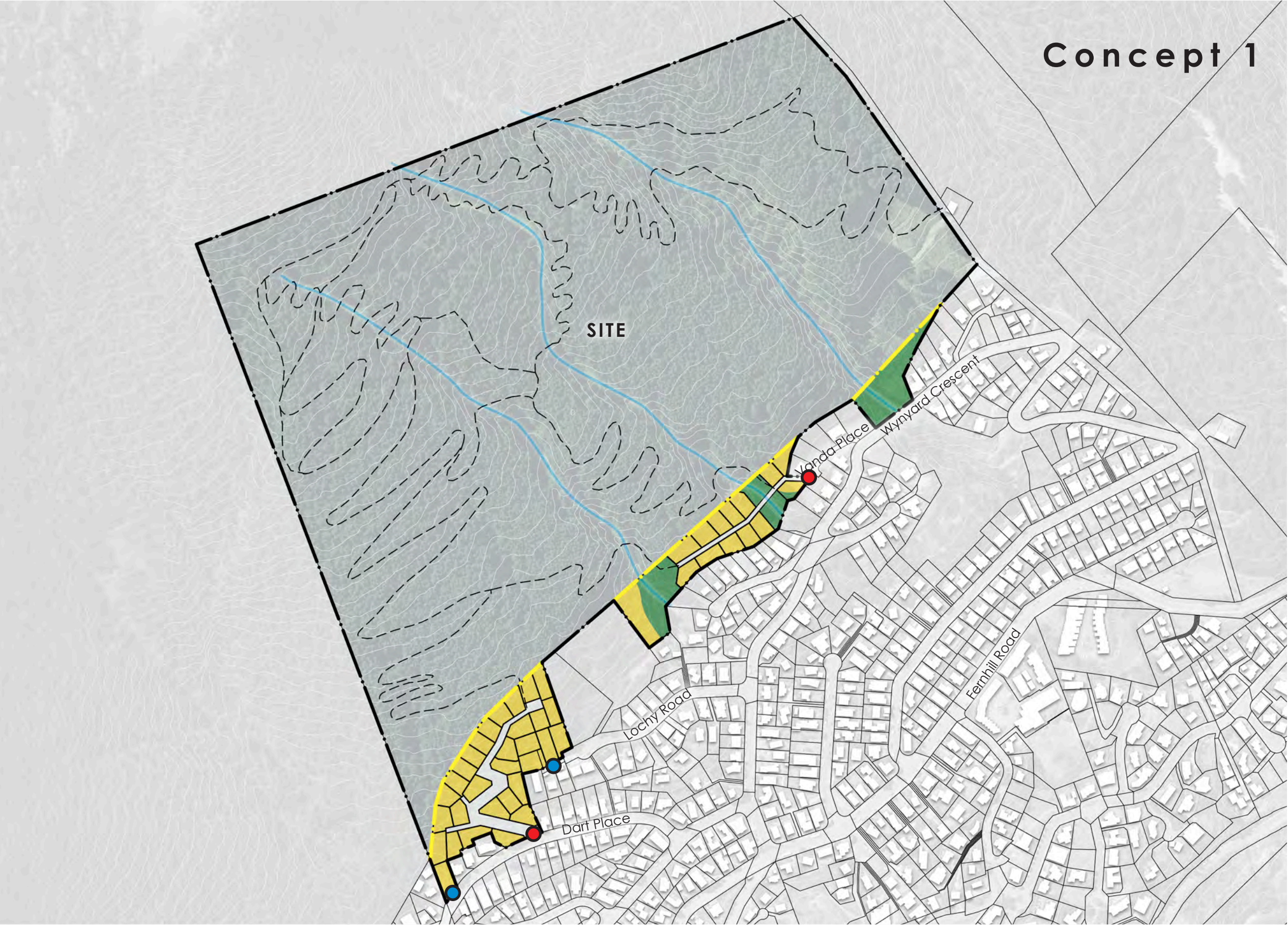
Below 560m: 6.96 ha

Potential urban growth  
area: 4.66 ha



Key:

-  Infill lower density suburban boundary
-  Reserve to improve freshwater quality
-  Potential urban growth pattern 46 lots ( ≈ 600m²)
-  Road access to existing roads
-  Lot access on existing roads
-  Indicative trail network





**Key:**

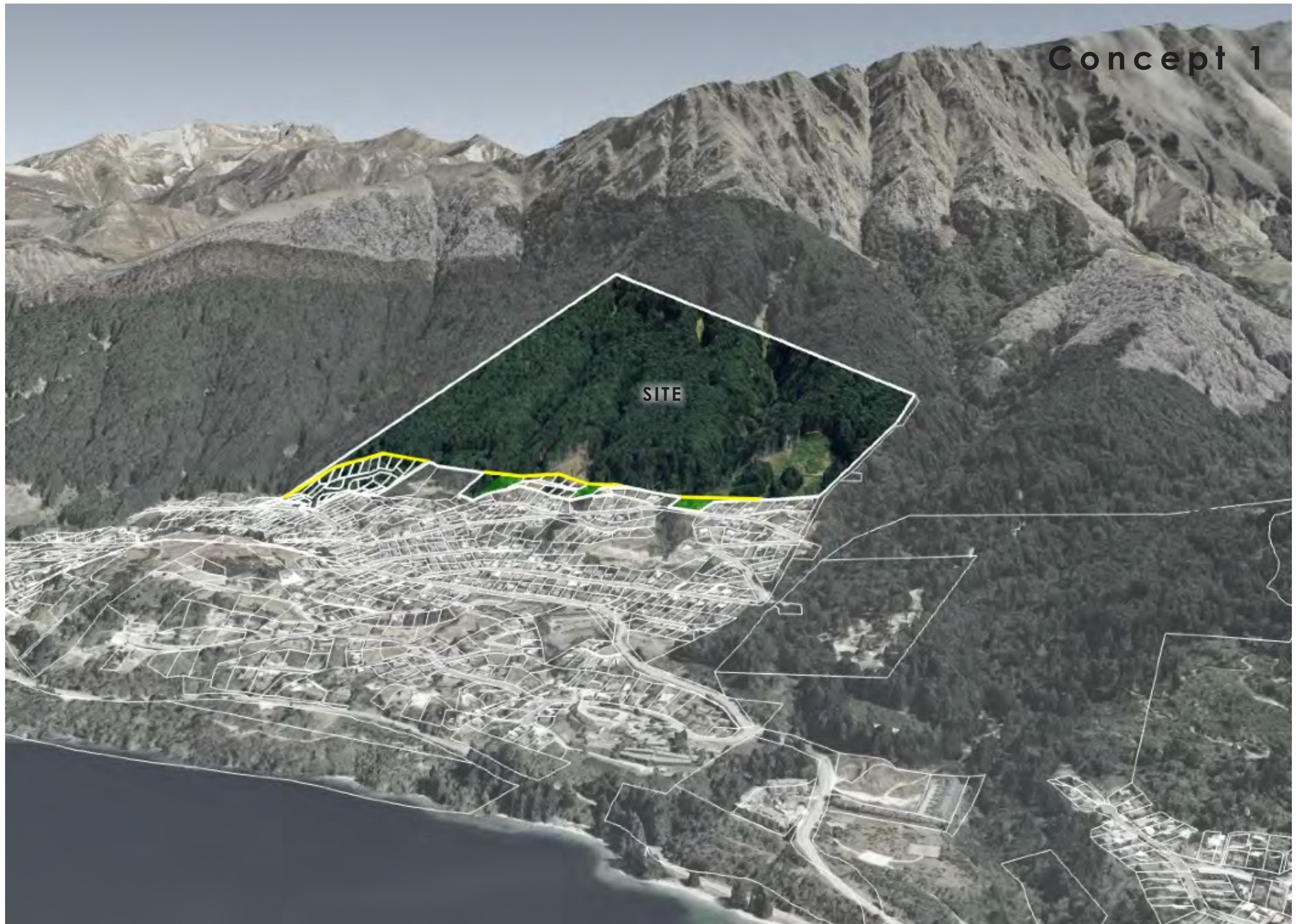
Infill lower density  
suburban boundary



Reserve to improve  
freshwater quality



Reserve to improve  
freshwater quality  
46 lots (  $\approx 600\text{m}^2$  )



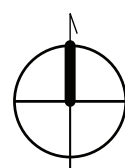
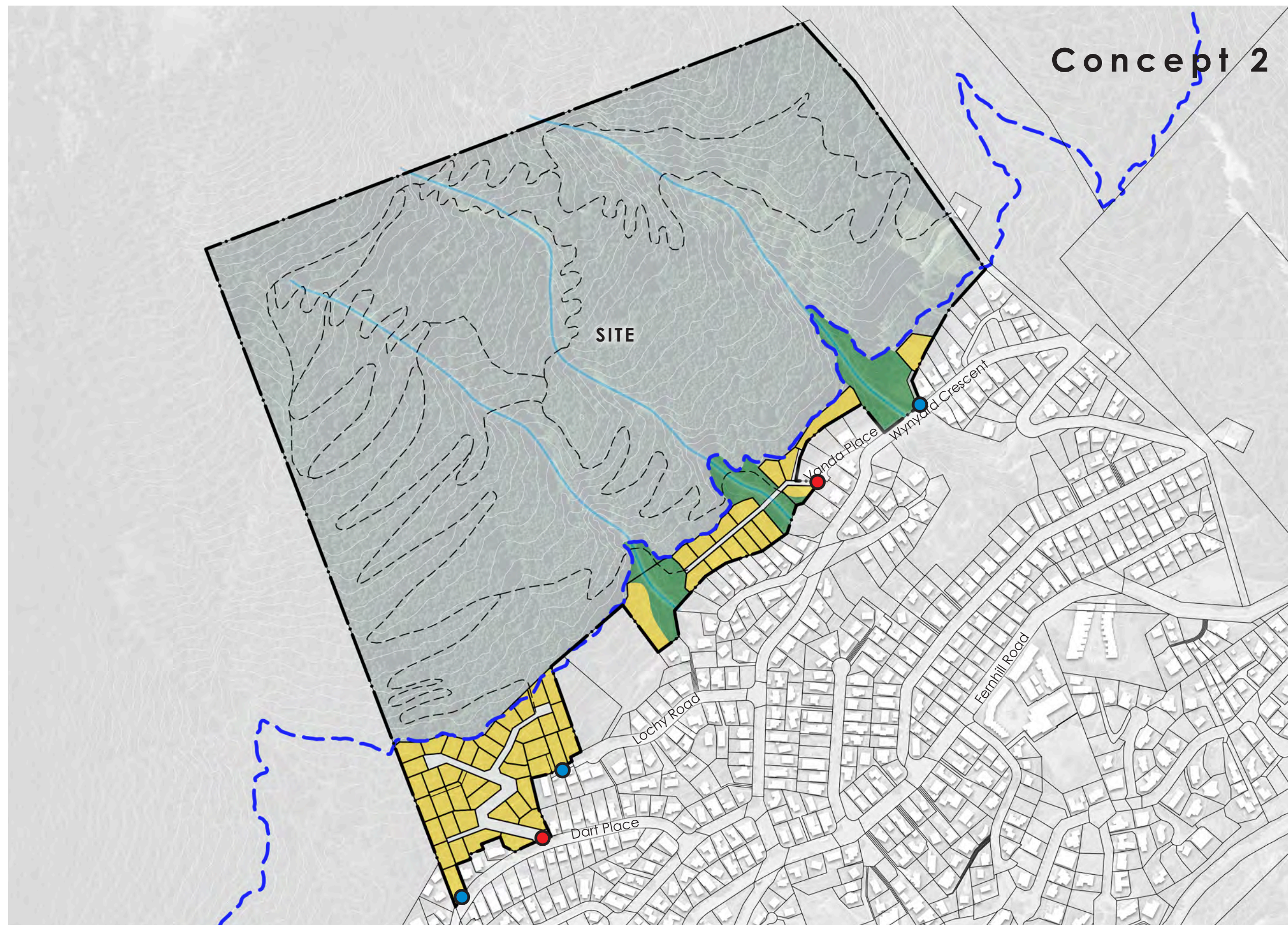
Concept 1

SITE

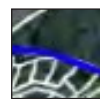


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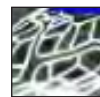
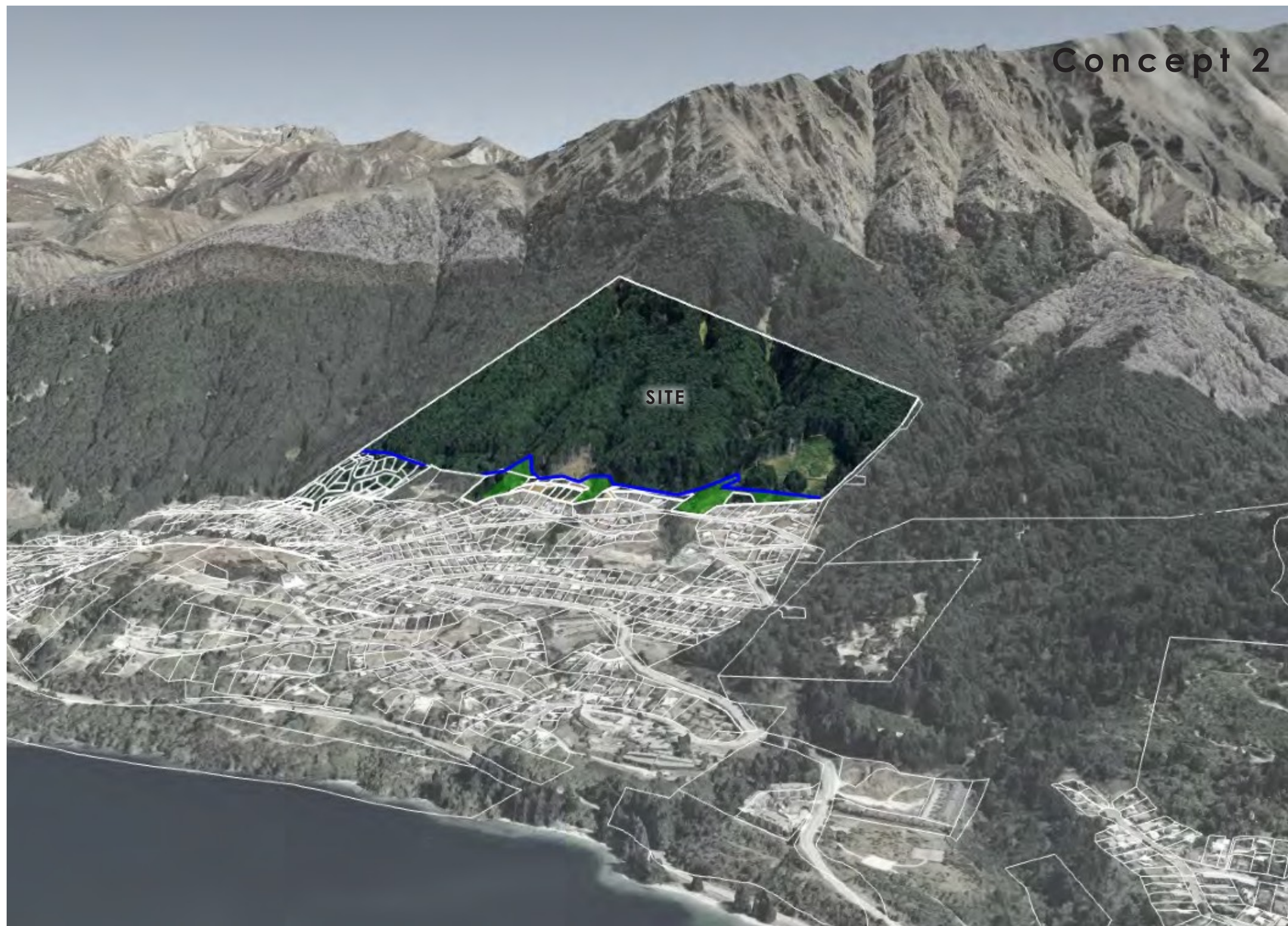
-  560m contour line
-  Reserve to improve freshwater quality
-  Reserve to improve freshwater quality 59 lots (≈ 600m²)
-  Road access to existing roads
-  Lot access on existing roads
-  Indicative trail network





**Key:**

560m contour line

Reserve to improve  
freshwater qualityReserve to improve  
freshwater quality  
59 lots (  $\approx 600\text{m}^2$  )



## Concept 2





# Concept 1





# Concept 2







# Attachment 2 - Submission #186 - Landscape Schedules

## Queenstown Lakes District Council

### Proposed District Plan – Submission

Clause 6 of First Schedule, Resource Management Act 1991  
FORM 5

Correspondence to:  
Attn: Planning Policy  
Queenstown Lakes District Council  
Private Bag 50072  
QUEENSTOWN 9348

### 1. Submitter details:

Full Name of Submitter:	Richard Kemp Trading As Pragmatic Planning
Address for Service:	PO Box 2770, Wakatipu, Queenstown 9349
Email:	richard@pragmaticplanning.co.nz
Contact Person:	Richard Kemp

### 2. Scope of submission

- This is a submission to the Queenstown Lakes District Proposed District Plan (PDP) Landscape Schedules, notified 30 June 2022.
- The submitter could not gain an advantage in trade competition through the submission.
- The scope of this submission is detailed below and in Part 3 of the submission.
- The specific provisions that my submission relates to are:

(a) Schedule:	21.22.12 Western Whakatipu Basin ONL
(b) Any other provisions:	Any other provisions relevant to the purpose of this submission described in Part 3 below.

### 3. Submission

The Submitter **OPPOSES** the newly mapped Western Whakatipu Basin ONL Priority Area Landscape Schedule 21.22.12 and seeks further information, clarification and amendments as set out below:



## **A. The landscape attributes (physical, sensory and associative)**

The landscape attributes include physical attributes such as: Vegetation patterns; Ecological (flora and fauna) and dynamic components; Settlements and occupation; Roads and circulation; Land use – cadastral pattern; Buildings; Likely future (permitted or consented) activities in the environment.

Para 26-38 - Under **important land use patterns and features**, the following was not included, and should be included:

- The unformed road that extends up the hill from Wynyard Crescent was not listed, as well as designation 237 and 22. Also, an unformed road along which the Ben Lomond track is formed.
- The Informal Recreation zoned land on the bottom of Ben Lomond, Cemetery Hill and Queenstown Hill was not listed. The permitted activities enabled by this zoning and associated effects that would have on the landscape values and capacity should be acknowledged.
- The irregular notified shape of the Priority area (**PA**) along the bottom slopes (Fernhill) of Ben Lomond and top of Queenstown Hill currently aligns with the Urban Growth Boundary (**UGB**) and existing land uses – a cadastral pattern instead of any landscape pattern or feature. This should be changed. Along with the need to either align the ONL and PA with landscape features or patterns or to acknowledge the capacity for urban expansion in-between the existing urban development.
- The Urban context with residential development on the lower slopes of Ben Lomond and Queenstown Hill (Fernhill, Queenstown and Arthurs Point) and its influence on the character of the area as a natural landscape should be acknowledged.

Para 101 -102 - Under **Aesthetic qualities and values**, the following was not included, and should be included:

- Point ix (**The general confinement of visible built development**) should also include the lower slopes of Ben Lomond (Fernhill) and Queenstown Hill where residential development has extended into the plantation forest and the PA. There is a need to amend the ONL and UGB line here so that it follows landscape features or patterns or to acknowledge the capacity for urban expansion in between the existing urban development.

## **B. The landscape values**

Para 103 -105 - the Summary of the landscape values needs to be updated to reflect the above-mentioned matters.

## **C. The related landscape capacity**

No rating scale is provided for the landscape capacities. From a review of the various Priority Areas, it appears to range as follows: No capacity; very limited capacity; limited capacity; some capacity. The extent of the capacity rating scale should be confirmed within the

Landscape Schedules. It should also be clear from the rating scale how these interrelate with the wording used in the provisions in Chapter 3. For example, Strategic Policy 3.3.31 states: “Avoid adverse effects on the landscape values of the District's Outstanding Natural Features and Outstanding Natural Landscapes from residential subdivision, use and development where there is little capacity to absorb change.” [emphasis added]

**Additional amendments sought - shown with underlined text and deleted text ~~struck through~~:**

- **Commercial recreational activities** – some landscape capacity for activities that integrate with or expand and/complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; eradicate wilding vegetation and replant native vegetation; enhance public access; enhance visual amenity and landscape values; and protect the area’s ONL values.
- **Visitor accommodation and tourism related activities** – Limited ~~no~~ landscape capacity for visitor accommodation on the lower slopes of the PA. The area can be serviced by Queenstown. Limited capacity for tourism related activities that expand or integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; eradicate wilding vegetation and replant native vegetation; enhance visual amenity and landscape values; enhance public access; and are consistent with the area’s ONL values.
- **Urban expansions** – ~~no landscape capacity.~~ Limited landscape capacity on the lower slopes of the PA, adjacent to or in-between the existing urban development.

Or

Update the PA mapping and associated ONL line/UGB and zoning to exclude areas where there is capacity to absorb urban expansion. These include areas on the lower slopes of Ben Lomond in Fernhill and Queenstown Hill where the ONL line simply follows the UGB (Land use – cadastral pattern) instead of landscape features or patterns.

So in summary, either acknowledge the capacity in the schedule or move the mapped PA, ONL line, UGB and zoning to reflect the actual landscape capacity.

- **Gondolas, towers and cableway** – Limited landscape capacity

#### 4. Further rational for capacity sought above.

Following the guidance of the Court of Appeal in **Man O'War Station Limited v Auckland Council [2017] NZCA 24**, the decisions on ONL lines need to be made on landscape grounds, rather than by a reference to their planning implications. The planning consequences that flow from the fact the land is an ONL are not relevant to determining whether or not it is an ONL. Conversely, the provisions or landscape schedules that relate to a ONL should not predetermine the planning consequences for the ONL.

By stating in these schedules that there is no capacity within the ONL landscape, the Council is predetermining the planning outcome for the land and fundamentally limiting the use of the land despite the underlying zoning. If the Council's schedule does not reflect the capacity of the landscape in the specified locations, then the appropriate planning decision would be to change the underlying zoning to reflect that.

Furthermore, by stating there is no capacity, the schedule seeks to avoid all development. This is not consistent with **King Salmon**, which found that it is "inappropriate" subdivision, use and development that is to be avoided, with inappropriateness assessed by reference to what is sought to be protected. It is not all adverse effects, nor all activities, that are to be avoided.

Lastly, it should be highlighted that the West Wakatipu ONL was specifically considered in **Skyline Enterprises Limited v Queenstown Lakes District Council [2017] NZEnvC 124**. The court accepted evidence [97] of Mr Denney's that the existing Upper Terminal and gondola have already compromised the visual coherence and naturalness at a prominent location in the landscape.

It also agreed [98] with Mr Denney that the question of whether the site has reached a 'threshold' with respect to the site's ability to absorb further change is to some extent related to what viewers would tolerate. It stated:

*Related to that, we agree with Mr Denney that the site's ability to absorb the redevelopment is helped by the fact that the redevelopment would occur in a relatively contained lower part of the clearing on the ridge and in close proximity to the already prominent existing Upper Terminal development....As such, we find on the evidence that the extent of mitigation now proposed in the QLDC conditions would be sufficient for ensuring the proposal does not represent 'a threshold with respect to the site's ability to absorb further change.'*

From this decision, it is clear that the landscape has capacity to absorb further commercial recreational, visitor accommodation, built form/urban expansion and gondola-type developments.

**5. The Submitter seeks the following decision from the Queenstown Lakes District Council:**

5.1 The Submitter seeks the relief set out in Part 3 of this submission.

5.2 The submitter seeks in the alternative additional or consequential relief necessary or appropriate to address the matters raised in this submission and/or the relief requested in this submission, including modifications to the landscape schedule or any such other combination of plan provisions, objectives, policies, rules, standards, and zoning provided that the intent of this submission, as set out in Part 3 of this submission, is enabled.

The Submitter **DOES** wish to be heard in support of this submission.

If others make a similar submission, the Submitter will consider presenting a joint case with them at a hearing.

Dated 26/08/2022

# Attachment 3 – Record of Title



## RECORD OF TITLE UNDER LAND TRANSFER ACT 2017 FREEHOLD Search Copy



  
R.W. Muir  
Registrar-General  
of Land

**Identifier** 838157  
**Land Registration District** Otago  
**Date Issued** 16 May 2018

### Prior References

OT12A/1491

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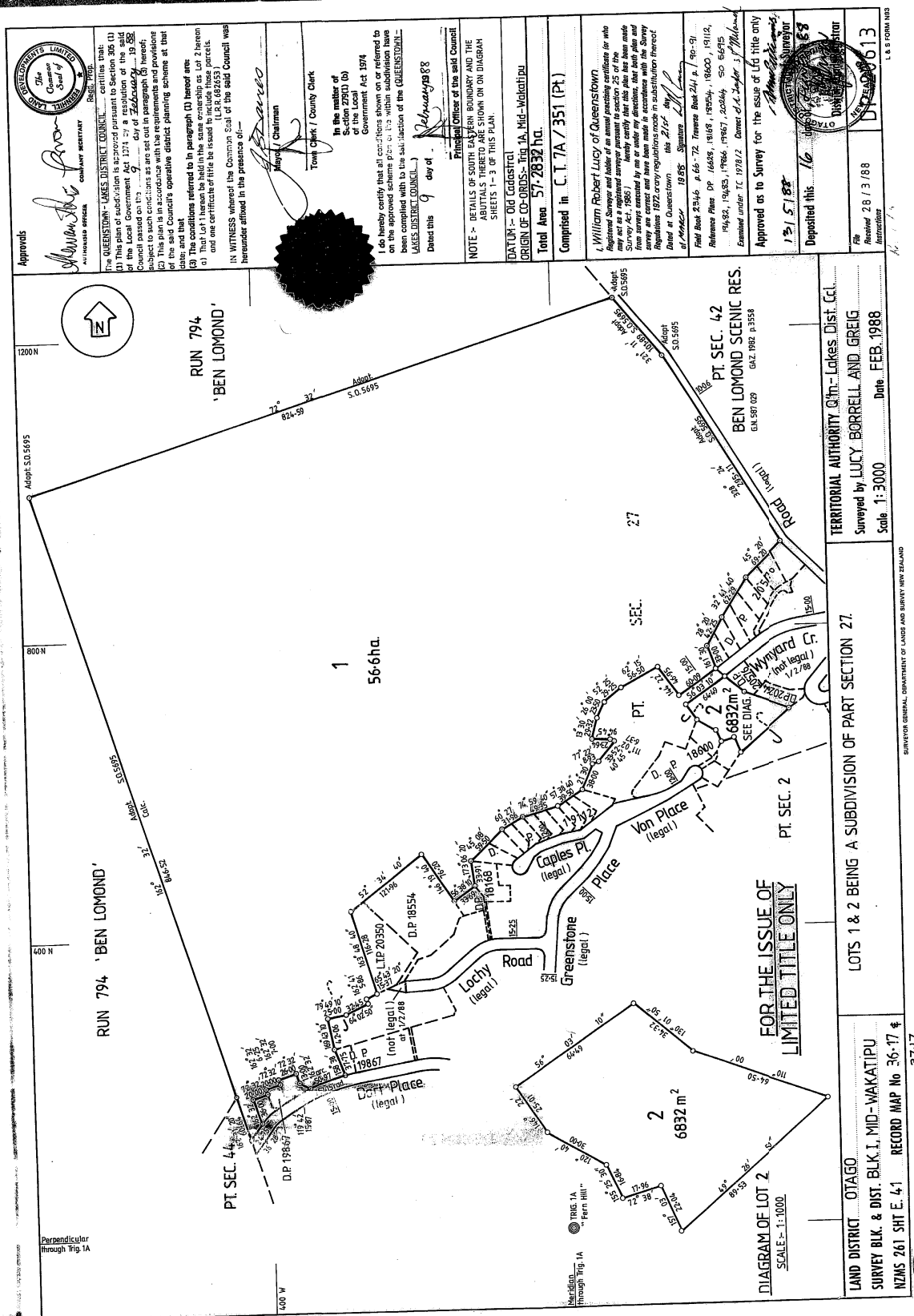
**Estate** Fee Simple  
**Area** 56.6000 hectares more or less  
**Legal Description** Lot 1 Deposited Plan 20613  
**Registered Owners**  
Passion Development Limited

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### Interests

Appurtenant hereto is a right of way, right to drain stormwater and foul sewage, right to convey water specified in Easement Certificate 753285.1 - 2.5.1990 at 9:45 am

The easements specified in Easement Certificate 753285.1 are subject to Section 309 (1) (a) Local Government Act 1974



### **Appendix 3 – Landscape Evidence of Steve Skelton – Landscape Schedules Hearing**

**BEFORE THE INDEPENDENT HEARING PANEL FOR THE PROPOSED  
QUEENSTOWN LAKES DISTRICT PLAN**

**UNDER** the Resource Management Act 1991 (RMA)

**IN THE MATTER** of a variation to Chapter 21 Rural Zone of the Proposed  
Queenstown Lakes District Plan, to introduce Priority Area  
Landscape Schedules 21.22 and 21.23. PA ONL  
Western Whakatipu Basin 21.22.12

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**STATEMENT OF EVIDENCE OF STEPHEN RUSSELL SKELTON  
11 SEPTEMBER 2023**

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## **Introduction**

- 1 My name is Stephen Russell Skelton. I am the Director of Patch Limited (Patch), a landscape architecture and landscape planning consultancy based in Queenstown.
- 2 I have been asked to provide evidence by Passion Development Limited who is the successor to a submission prepared by Richard Kemp(no186). The Submission seeks to vary the Queenstown Lakes Proposed District Plan Landscape Schedules 21.22 & 21.23 with particular regard to what the spatial extent of the 'Western Whakatipu Basin' ONL Priority Area' 21.22.12, as well as seeking changes to the text of this related schedule

## **Qualifications and Experience**

- 3 I hold the qualifications of a Bachelor of Arts in Communication from Northern Arizona University and a Master of Landscape Architecture (First Class Hons) from Lincoln University. I am a registered member of the New Zealand Institute of Landscape Architects.
- 4 I have been involved in landscape consultancy work for ten years, working in both the public and private sector. I held the position of landscape planner with Lakes Environmental before it was absorbed by the Queenstown Lakes District Council. I then held the position of Landscape Architect at another landscape architecture practice in Queenstown for approximately 4 years before founding Patch Limited.
- 5 I founded Patch in 2016 and our work includes all facets of landscape architecture and landscape planning through the range of small and large-scale projects. My work involves master planning, residential and commercial landscape design, preparation of native restoration planting plans, preparation of landscape management plans and preparation of landscape assessments for resource consent applications and plan changes.
- 6 Of relevance to the Proposed District Plan (PDP) I have been engaged by several land owners and interested parties over the years to provide landscape advice and evidence on various matters in associated council hearings and Environment Court appeals. Those matters include Topic 2

- Rural Landscapes, Topic 30 and Topic 31 Whakatipu Basin and Topic 3B - Rural Visitor Zone.

- 7 With respect to the Western Whakatipu Basin (WWB) Priority Area (PA) I have observed and experienced the landscape's values and attributes in many ways over the 12 years I have lived in the District. In a personal capacity, I have paraglided over all of the WWB which is within the general aviation (GA) airspace. I have hiked most of the trails within the WWB and I have ridden most of the mountain bike trails within the WWB. I have held a season pass at the Skyline Gondola for approximately 10 years. I have skied off Bowen Peak in winter and have hiked the ridgeline between Ben Lomond and Fernhill.
- 8 In a professional capacity, I have worked with the submitter to provide advice with respect to the Queenstown Lakes District Council's Spatial Plan 2024 Gen. 2.0 – Call for Urban Growth Sites (the Spatial Plan). Some of the work I undertook in preparing that advice has informed the considerations contained within this evidence. I have also worked for tourism operators and private landowners seeking professional landscape advice on the capacity and potential future development opportunities of their land within the WWB PA, with regard to land on the lower, east facing slopes of Bowen Peak and those associated with Ben Lomond Scenic Reserve.

### **Code of Conduct**

- 9 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. Accordingly, I have complied with the Code in the preparation of this evidence, and will follow it when presenting evidence at the hearing. Unless I state otherwise, this assessment is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

### **Scope of Evidence**

- 10 My evidence addresses the following:

- a) General comments on the study methods and capacity ratings in the schedules variation;
- b) What are the boundaries of the WWB PA?;
- c) Recommended amendments to schedule 21.22.12 PA ONL  
Western Whakatipu Basin: Schedule Of Landscape Values.

## Capacity Ratings and Study Methods

### *Methodology*

- 11 It is my understanding from reading the *Methodology Statement*<sup>1</sup> that, while deriving much of their methods from the *Te Tangi a Te Manu*, or Aotearoa Landscape Assessment Guidelines (TTatM), the authors of the Landscape Schedules (the Authors) have created a unique method in preparing the Landscape Schedules. It is worth noting the TTatM does not specify a method for undertaking such studies. If the landscape architects had undertaken a Landscape *Sensitivity* Study, they would have had the benefit of adopting established methodologies for undertaking such a study.<sup>2</sup>
- 12 The methodology in preparing the Landscape Schedules was, in my opinion, correct in its approach to identify the scope and location of the PAs and identify and rate landscape attributes and values. However, I note that one cannot 'estimate' how much of an unknown future activity could be accommodated when there are potentially activities, including scale, location, form and external appearance, which we have not yet imagined. The schedules acknowledge that only a certain list of general activities have been assessed which are directed in Chapter 3, and other activities will in future require their own capacity assessment.

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<sup>1</sup> ONF, ONL and RCL Priority Area Landscape Schedules, Methodology Statement, Final, May 2022

<sup>2</sup> Including : "An approach to landscape sensitivity assessment – to inform spatial planning and land management." June 2019 Christine Tudor, Natural England and  
'Landscape Sensitivity Studies' NatureScot

### *Capacity*

- 13 Assessing capacity is imprecise<sup>3</sup> and accepts that there is an unknown future of landscape where creative land uses may be conceived and applied for in a resource consent application.
- 14 In creating their own landscape capacity rating (of an unknown future), the Authors developed a scale consisting of the word 'some' (at the highest end of the scale) and the word 'no' (at the lowest). This, in my opinion, sets the pretext that, as a starting point, the PAs have a low capacity. There is no capacity rating higher than some, such as 'high or 'lots'. Similarly, the use of the word 'no' is determinative for an 'imprecise' study in the face of an unknown future.
- 15 The scale employed in the Schedules is also inconsistent with that used in Schedule 24.8 of the PDP for the Whakatipu Basin. This is confusing to plan users and unnecessarily alters assessment terms between landscapes which are often adject to each other.
- 16 Also, a four-point scale (as notified and now amended to a five-point scale) does not have a middle pivot point. I understand the authors have now added a fifth rating scale of 'very limited to no'. This provides for a middle pivot point but does not address the aforementioned pretext of the word 'some' and determinative nature of the word 'no'. I consider a five-point rating is more appropriate in this context as it is not overly complex, can be easily interpreted, employs a middle pivot point and can better assist plan users and the community as to anticipated activities and consequent change to landscapes.
- 17 The above discussion is a preamble to the part of the submission that request the rating scale is clear in how it interrelates with the wording used in the Chapter 3 provisions. I consider a rating of 'No Capacity'

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<sup>3</sup> TTYatM Part 5.49 "*Generic attributes such as sensitivity and capacity are necessarily imprecise because they estimate a future. They can be useful and necessary in policy-based assessments, or in comparing alternative routes/localities, but they become redundant once the actual effects of a specific proposal can be assessed directly.*"

cannot be given unless an assessment of all sites within a PA has been undertaken. The word 'no' is too determinative, especially with the understanding that landscape capacity/sensitivity is imprecise and can change over time.

- 18 I consider it most appropriate to rely on a five-point scale. The five-point scale below is often used by landscape practitioners when describing a landscape's capacity for, or sensitivity to change:

*1. Very High 2. High 3. Medium 4. Low 5. Very Low<sup>4</sup>*

- 19 I provide a description of these ratings below based on a modified version of what Landscape Architect Bridget Gilbert sets out in part 9.26 of her evidence. Any changes I suggest are highlighted in red.

**Very high ~~Some~~ landscape capacity:** typically this corresponds to a situation in which ~~a careful or measured amount of~~ sensitively located and designed development of this type is unlikely to materially compromise the identified landscape values.

**High ~~Limited~~ landscape capacity:** typically this corresponds to a situation in which the landscape ~~is nearing its~~ **has limited** capacity to accommodate development of this type without material compromise of its identified landscape values and where ~~only~~ a modest amount of sensitively located and designed development is unlikely to materially compromise the identified landscape values.

**Medium ~~Very Limited~~ landscape capacity:** typically this corresponds to a situation in which the landscape ~~is very close to its~~ **has some** capacity to accommodate development of this type without material compromise of its identified landscape values, and where only a **very**

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<sup>4</sup> As recommended by:  
Scotland's Nature Agency, Landscape Sensitivity Assessment Guidance. Part 2.21  
and  
"An approach to landscape sensitivity assessment – to inform spatial planning and land management." Part 2.4, June 2019 Christine Tudor, Natural England

small amount of sensitively located and designed development is likely to be appropriate.

**Low ~~Very Limited to No~~ landscape capacity:** typically this corresponds to a situation in which the landscape is ~~extremely very~~ close to its capacity to accommodate development of this type without material compromise of its identified landscape values, and where only ~~an extremely very~~ small amount of ~~very~~ sensitively located and designed development is likely to be appropriate.

**Very Low ~~No~~ landscape capacity:** typically this corresponds to a situation where development of this type is likely to materially compromise the identified landscape values.

- 20 The above landscape capacity scale would provide for some greater internal consistency across the PDP which uses similar scales.

*Preamble to Schedule 21.22 and Schedule 21.23*

- 21 I have considered Ms Gilbert's proposed Preamble to Schedule 21.22 and Schedule 21.23.<sup>5</sup> I consider the text she has proposed is largely appropriate. However, if the capacity rating of 'no' is incorporated in the Schedules, I do not consider the preamble is enough to ensure Plan users, particularly Council staff, will understand that 'no capacity' is 'not a fixed concept'.
- 22 As discussed above, capacity ratings are imprecise, and I consider the clear language contained within part 5.49 of the TTatM and reproduced above (footnote # 3) should be included in the preamble.
- 23 It is my experience that Plan users, particularly Council staff, take a hard stance when strong language, such as the word 'no' is used. If the intention of the capacity ratings is relatively 'high level', 'is not a fixed concept' 'may change over time' and is not intended to prescribe 'the capacity of specific sites within the PA'<sup>6</sup> then I consider the capacity

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<sup>5</sup> Bridget Gilbert's Evidence 11 August 2023, Part 9.26

<sup>6</sup> Bridget Gilbert's Evidence 11 August 2023, Part 9.26

ratings should be changed to those terms suggested above in my evidence, or alternative suitably flexible / open-textured language.

### **What are the boundaries of the WWB PA**

- 24 I understand that the Council's evidence maintains there is no 'scope' to make mapping amendments to the PA boundaries as spatially identified in the PDP. However, I note that the GIS link to the spatial mapping was included within the public notice documents for this variation process, and my understanding from talking to a range of submitters, is that many are under the impression or understanding that consequently, a values and attributes assessment could result in necessary changes to some mapped boundaries of PAs.
- 25 Generally speaking, it is best practice in identification of whether a particular site is part of a landscape (or not) to undertake a first principles values and attributes assessment, and this leads to conclusions as to mapped boundaries on the extent of a landscape. This process effectively is the first opportunity for a number of sites within already identified ONLs and ONFs where values, character, and related capacity has been considered in detail. Consequently, and as set out below, in some instances I do not agree with current mapped boundaries of the underlying ONF / ONL (and the PA) boundaries resulting from my values assessment.
- 26 At a high level, I disagree with the inclusion of Queenstown Hill, Sugar Loaf and Lake Johnston ONL as part of the WWB PA. I consider these pastoral, glacially overridden lands hold distinctly separate landscape attributes and values to the dramatic, partially forested mountain slopes of Ben Lomond and Bowen Peak. I consider the WWB PA should be considered separately from the Queenstown Hill Lake Johnson ONL and that the PA boundaries should be drawn along or near Gorge Road as shown in my **Attachment A**. I also consider the Ferry Hill ONF should form part of a 'Queenstown Hill, Lake Johnson, and Ferry Hill ONL PA' as the attributes and values of Ferry Hill and the other parts of the ONL are similar. I do not wish to labour this point and the evidence contained below does not seek relief as such.
- 27 With respect to the submitter's land and the lower, southern boundary of the WWB PA, I agree with the submission that in this instance, the PA

boundary could better follow landscape pattern, such as the location of existing buildings, access and other urban elements across a similar landform, elevations and vegetation pattern, rather than cadastral lines as shown in my **Attachment B**.

- 28 In preparing my advice for the submitter on the Spatial Plan (attached as **Attachment C**) we undertook a study of the site and determined that the existing development within the Fernhill / Sunshine Bay exists generally below the 560m contour (refer Concept Package in **Attachment C**, Graphic E). We assessed values and attributes at a site scale within the wider landscape context, and examined the capacity for land below the 560masl contour to absorb urban type development without resulting in adverse effects on the wider ONL's attributes and values. As part of that body of work we determined two potential future outcomes for the site. Those potential outcomes sought to realign the ONL boundary and Urban Growth Boundary and allow for urban infill development within an area which I consider capable of absorbing future urban development. This line is represented in yellow in the Concept Package in **Attachment C**, Graphics E, F, G and H). We also prepared an indicative urban subdivision pattern within that land (refer Concept Package in **Attachment C**, Graphics G and H) and represented how that urban infill may look in a visual representation (refer Concept Package in **Attachment C**, Graphics K and L).
- 29 I note as part of this Landscape Schedule submission I am supportive of our Option 1 shown in our Concept Package, which uses landform and existing patterns as a landscape boundary and not Option 2 which uses only landform.
- 30 Upon undertaking my own assessment of the site's values and attributes, and in considering those against the Schedules description, I do not consider the parts of the site represented in yellow in the Concept Package in **Attachment C**, Graphics E, F, G and H) shares the same values and attributes as the wider WWB ONL. This part of the site does not reach the sufficient naturalness threshold to warrant section 6B classification. For the reasons outlined above and set out in our Spatial Plan memo (**Attachment C**) I support the submission that the irregular notified shape of the WWB ONL PA along the bottom slopes (Fernhill) of Ben Lomond should follow landscape patterns rather than cadastral boundaries.



**Proposed Amendments to Schedule 21.22.12 PA ONL Western Whakatipu Basin: Schedule of Landscape Values**

- 31 I was not involved in preparation of the original submission but have been asked to review the submission, the adoptions by Ms. Gilbert, and to provide landscape advice with respect to appropriate wording, terminology and my assessment of those landscape values and attributes to which the submitter has addressed. I attach to my evidence a track-changes version of the Landscape Schedules as proposed (**Attachment D**).
- 32 The following portion of my evidence will address the proposed changes to the landscape schedules. I structure my evidence in accordance with the paragraph numbers as set out in the Landscape Schedules.
- 33 The following parts of my evidence are to be read in light of the preceding section, which addresses why I consider the site should not be included within the WWB PA (or the ONL itself).

***Important land use patterns and features - 38***

- 34 I consider an important feature of the WWB PA is its adjacency to urban areas. I consider these urban areas have a significant influence on the PA and that their presence should play a greater role in the description of the landscape's important land use patterns and features. I have made subtle suggestion which in my opinion will better address the PA's adjacency to the urban areas.

***Aesthetic qualities and values – 102 (b) (ix)***

- 35 In part 102 (b) (ix), I have added the 'lower slopes of Ben Lomond' to the described, visually confined built development. This is to suggest the urban infill assessed for the site as set out in my attachments, would be visually confined similar to the other areas already listed in the Schedule.

**Summary of Landscape Values 104 (c)**

- 36 I consider the very strong shared and recognized values are associated with the PA's adjacent to urban areas. I consider if the PA was not

adjacent to these urban areas the shared and recognized values would be lower. Therefore I consider the PA's adjacency should form part of this descriptor.

### **Summary of Landscape Values 105 (d)**

- 37 I consider part of the PA's perceptual values are attributed to its hard edge against urban areas. I consider this adjacency should be included in this descriptor.

### **Landscape Capacity (ii) - Visitor accommodation and tourism related activities**

- 38 For the reasons set out above, I consider there is limited (or second highest on a five-points scale) capacity for this type of (ill defined) activity to occur where they are associated with urban areas of Fernhill.

### **Landscape Capacity (iii) – Urban Expansion**

- 39 For the reasons set out above in my evidence I consider there is limited (or second highest on a five-point scale) capacity (should the boundary of the PA not be shifted as suggested in my **Attachment B**) for urban development where that development will read as infill on the lower slopes of Ben Lomond near Fernhill.

.....  
**Stephen Russell Skelton**



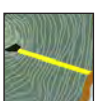
**11 September 2023**

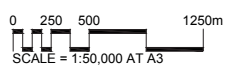
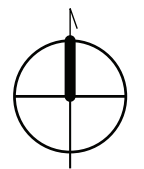
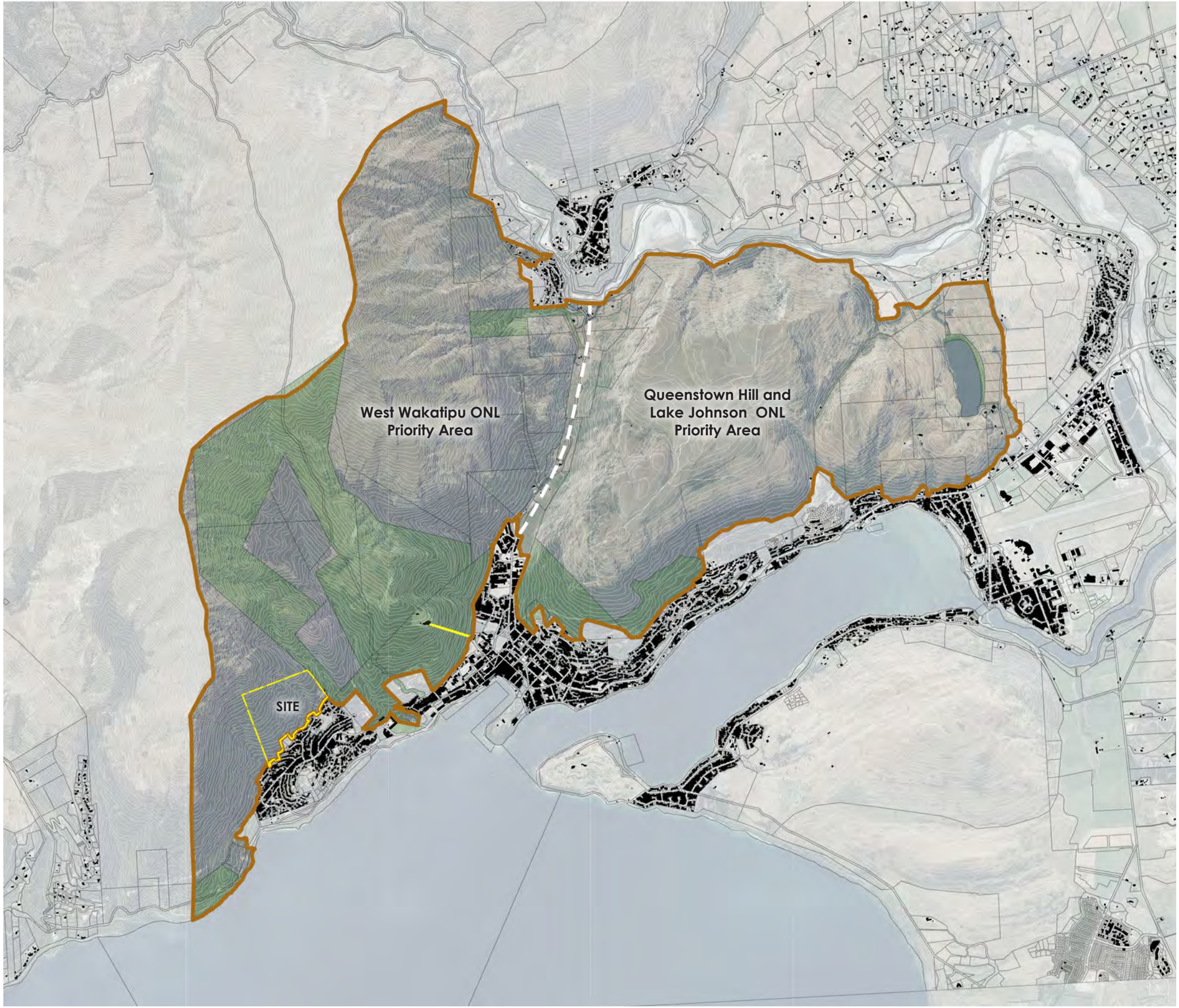
**ATTACHMENT A**

Western Whakatipu Basin Priority Area ONL - Activity Map



Key:

-  Priority area boundary
-  Reserves and DOC land
-  Gondola





**ATTACHMENT B**

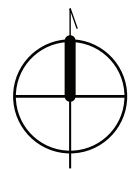
Western Whakatipu Basin Priority Area ONL – Proposed Priority Area



Key:



Priority area  
boundary





**ATTACHMENT C**

Submission to the Queenstown Lakes District Council's  
Spatial Plan 2024 Gen. 2.0 – Call for Urban Growth Sites (the Spatial Plan)  
And Graphic Attachments



## LANDSCAPE MEMO – Urban Development – Wynyard Crescent – Fernhill

13 July 2023

### INTRODUCTION

1. This memo provides landscape and urban design comment regarding a submission to Queenstown Lakes District Council's Spatial Plan 2024 Gen. 2.0 – Call for urban growth sites. The subject site is 56.6 hectares in area and occupies much of the forested hill slopes to the north of and above the urban area known as Fernhill in Queenstown. The legal description of the site is Lot 1 DP 20613
2. Patch has prepared a series of analyses and design graphics which are attached and will be referred to throughout this memo. The analysis graphics set out:
  - A. the existing urban growth boundary (UGB),
  - B. the Wāhi Tūpuna line,
  - C. the existing zoning,
  - D. the Outstanding Natural Landscape (ONL) boundary and contours,
  - E. a plan setting out the existing development standards,
  - F -L indicative design layers which project future development of the potential urban area.



## ASSESSMENT CONTEXT

3. The design layers listed above and contained within the attached supporting graphics are rooted in a high-level assessment of the proposal which is based on landscape and urban assessment imperatives and statutory context. Those include:
  - Part 21.21.1 of the Proposed District Plan derived from *Decision No. [2023] NZEnvC 58 – Appendix A – Part 4, 21 Rural for Outstanding Natural Features and Outstanding Natural Landscapes (ONF and ONL), and*
  - The notified Schedule of Landscape Values: Outstanding Natural Landscapes Priority Areas 21.22.12 – Western Whakatipu Basin ONL.
4. The high-level assessment below is prepared in the frame of the New Zealand Institute of Landscape Architects (NZILA) *Te Tangi a Te Manu Aotearora New Zealand Landscape Assessment Guidelines*, July 2022.

### PROPOSED DISTRICT PLAN – PART 21.21.1 – ONLS AND ONFS

5. This part of the PDP was derived from the Environment Court's decision in 2023 with significant reference to Chapter 3 and Chapter 6 of the PDP and the landscape schedules which are currently notified and subject to submissions, hearings and likely appeals. Part 21.21.1 of the PDP ensures regard is given to the landscape schedules and the values identified and to what extent any proposal will protect Tangata Whenua values. This part will be discussed in further detail below.

#### *Summary – Part 21.21.2*

6. Part 21.21.2 of the PDP seeks to consider visibility and whether any parts of a proposal will detract from public or private views of and within ONLs or ONFs, whether they're mitigation is provided and if that mitigation is in keeping with the protection of landscape values. Assessment of effects on ridges, hills and slopes, lighting, earthworks and landscaping are all considered. This part of the PDP gives regard to open space and open character and seeks to maintain open space and open character as viewed from public roads and public places and ensure development is not within a broadly visible expanse of open landscape as viewed from public roads or public places. This part of the PDP also seeks to consider development's effects on open space and open character on the surrounding landscape and to contain development within areas defined by natural elements. This part of the PDP also seeks to

ensure development does not contribute to adverse cumulative effects on landscape values identified in the landscape schedules by introducing significant adverse visual effects.

*Assessment – Part 21.21.2*

7. The indicative proposed urban design extension above Fernhill and Sunshine Bay would not occur on any prominent hills, slopes or ridges. Lighting and earthworks would be viewed in conjunction with the existing urban areas and would not extend beyond a natural line in the landscape. This proposed extension of urban areas would not be in a broadly visible expanse of open landscape and would not act to noticeably reduce any openness or open character of the much broader south facing slopes of Ben Lomond. Design would largely be defined by natural elements such as the gullies or the edge of existing urban areas. The proposal would not contribute to significant or adverse cumulative effects on landscape values which will be discussed further below under the landscape schedule assessment.

*Summary – Part 21.21.3*

8. Part 21.21.3 of the PDP seeks to ensure that future development is designed in response to the identified landscape values and built development is aggregated to utilize common access ways and to cluster areas of development where parts of the landscape least sensitive to change. It seeks to ensure boundaries will not give rise to artificial or unnatural lines in the landscape and that the design and development does not contribute to adverse cumulative effects on landscape values.

*Assessment – Part 21.21.3*

9. Indicative proposals as set out in **Attachments E – M** seeks to infill urban development within areas where that urban development immediately abuts an ONL. This infill type development will see a very small extension of the existing urban area into parts of the ONL which are already affected by that urban development. Any future development within this area would be aggregated and will utilize a common accessways. It would appear as a clustered urban development in a part of the landscape which is least sensitive to change. We have derived two potential, legible, logical and justified lines (refer to **Attachment E** – Potential Urban Growth Area and 560m contour line) which we consider would not give rise to artificial or unnatural lines in the landscape. It is considered that this infill type urban development would not contribute to adverse cumulative effects on landscape values which will be discussed further below under the landscape schedule assessment.

#### *Summary – Part 21.21.4*

10. This part of the PDP considers methodology and how that methodology is applied in the consideration of cumulative effects on landscape values. It also seeks to arrive at an outcome of an assessment of landscape capacity in accordance with SP 3.3.29 and SP 3.3.45. This part of the plan requires an assessor to consider existing, consented or permitted subdivision or development and how those address landscape capacity as well as the effects of proposal would have on landscape values and landscape capacity.

#### *Assessment – Part 21.21.4*

11. In terms of assessment methodology, most landscape architects are now adhering to the assessment guidelines which were prepared by the New Zealand Institute of Landscape Architects. A consistent assessment methodology is used throughout the profession. That assessment methodology applies measurable spatial and other indicators to inform conclusions and then accounts for effects and how they may influence visual and landscape values. With regard to existing consented and permitted subdivision and development in the Fernhill /Sunshine Bay Area, it is considered that the proposal will read and as infill in an insignificant part of the adjacent rural lands and that the infill will not exceed the landscapes capacity to absorb change.

#### **LANDSCAPE SCHEDULES – 21.22.12 WESTERN WHAKATIPU BASIN ONL**

12. We have undertaken a review of the text contained under the Western Whakatipu Basin ONL (WWB-ONL) and provide the following comment.

#### *Important landforms and land types*

13. The schedule lists several important landforms and land types, very few of which address any part of the site or its immediate adjacent landscape. The WWB-ONL is a large landscape and takes in much of the wider hills and mountains which enclose the Queenstown area. The proposal would not act to have any effect on the important landforms and land types listed in the schedule.

#### *Important hydrological features*

14. The landscape schedules refer to a series of unnamed streams on either side of One Mile Creek network, draining directly to Lake Wakatipu as well as numerous unnamed streams draining the southern and eastern sides of Bowen Peak. These hydrological features generally refer to the gullies which run through the site and then through the urban areas of Fernhill and Sunshine Bay. Any proposal for future development in the proposed area could result in significant enhancements of these hydrological features through the clearing of wilding conifers within their gully type landforms and the enhancement of those water features through naturalistic, indigenous planting (refer **Attachments G-J**).

#### *Important ecological features and vegetation types*

15. The site does not hold any noteworthy indigenous vegetation features and is only referred to under the subject matter '*other distinctive vegetation types*' in which the schedule describes the almost continuous patterning of plantation Douglas fir forest throughout the mid and lower flanks of Ben Lomond and the southern flanks of Bowen Peak. These vegetation types are not particularly aesthetic or memorable and are a biodiversity problem. The proposal would likely see the removal of this exotic forest cover in parts of the site, including those associated with any gully enhancement areas.

#### *Important land use patterns and feature*

16. The schedule nods to the proliferation of wilding conifers across the urban interface, as well as the gondola and other facilities associated with the gondola. Other important land use patterns and features which are discussed in the landscape schedule include this series of trail networks which are used for recreation. The landscape schedule notes an absence of rural and rural living buildings and highlights that urban residential and commercial development adjoining the southern edge of the area and its associated recreation features are important parts of the landscape. The proposed urban development areas would seek to enhance the land use patterns particularly those associated with recreation values (refer to indicative trial networks on **Attachments G and I**).

#### *Important archaeological and heritage features and other locations*

17. The site does not have any important archaeological or heritage features.

#### *Mana whenua features and their locations*

18. The schedule notes that the entire area is ancestral land to Kai Tahu and is significant. It notes much of the ONL is mapped as Wahi Tupuna. That mapping is shown in **Attachments B and E**. No part of any infill development would occur within the Wahi Tupuna mapped area.

#### *Important shared and recognized attributes and values*

19. This part of the landscape schedule refers to parts of the landscape which are significant in terms of cultural understanding. Those include many photographs of the landscape including those from the gondola and postcard views as well as the identity of Bowen Peak. It is worth noting that the Fernhill/Sunshine Bay area is not part of these more memorable images. It is considered that any proposed infill urban development would not result in adverse effects on shared and recognized attributes and values of the ONL.

#### *Important recreation attributes and values*

20. The schedule lists the multitude of recreational opportunities which are available within the landscape. An urban-type development within the proposed locations could be accompanied by enhancements to the existing trail network (**Attachments G and I**) and other recreational facilities which could be enjoyed by the public.

#### *Legibility and expressiveness attributes and values*

21. This deals particularly with natural landforms, land type and hydrological features as well as indigenous gully and wetland plantings. While the site does not contain any important land types, it does hold some significant gully landforms which could benefit from indigenous gully and wetland plantings and weed clearance which would reinforce the legibility and expressiveness of those features (**Attachments G-J**).

#### *Particularly important views to and from the area*

22. This part of the landscape schedule lists in detail significant views to and from the landscape. None of those important views are noted to contain the subject site, except where the schedule refers to engaging mid to long range views from Queenstown, Fernhill and Sunshine Bay where the largely forested slopes of Ben Lomond form the backdrop of Queenstown. The schedules go on to say that the bold contrast between urban development throughout the lower flanks of the hill and the elevated wooded slopes is memorable and of importance to

identity of Queenstown as a settlement tucked into the base of a mountain. The proposal will not act to change any of this visual amenity) and if developed the landscape would continue to form the importance of this identity of Queenstown as a settlement tucked into the base of a mountain (refer to **Attachments K-M**).

#### *Naturalness attributes and values*

23. Most of what is described under this heading in the landscape schedules is not relevant to the site. However, one paragraph describes the forestry plantings across the south flanks of Ben Lomond and parts of Bowen Peak. This part of the landscape schedule considers that those plantations contribute to a reduced perception of naturalness. It goes on to say that the visual appearance of these parts of the landscape during and after harvesting cycles forms a prominent negative visual element within the broader landscape setting and serves to temporarily further reduce perception of naturalness in this part of the landscape. It is our opinion that while the existing forested cover of the site is not native forest, it does contribute to naturalness as viewed through the lens of a visitor. While from an ecological perspective it would be beneficial to clear this area of its wilding conifers, in terms of this urban infill type development, no wide scale clearance of conifers would be considered.

#### *Memorability attributes and values*

24. Again, the landscape schedule discusses the juxtaposition of the mountains and landforms within the larger urban context. It goes on to discuss the close-up experience of the alpine setting which is adjacent to the urban areas and is highly accessible. It discusses the sense of Queenstown as a place tucked into a majestic mountain setting. The proposed urban development area would not act to change any of these memorability attributes and values.

#### *Transient attributes and values*

25. The proposed urban development area would not act to change any transient attributes and values as set out in the schedule.

#### *Remoteness and wildness attributes and values*

26. The proposed urban area would not act to change any remoteness and wildness attributes and values as set out in the schedule.

### *Aesthetic qualities and values*

27. The schedule again describes the mountain landforms juxtaposed beside an urban context and describes the large scale and dramatic character of the mountain landforms and sculpted peaks which form the backdrop to Queenstown as well as the sculpted peaks. However, much of the aesthetic qualities and values which are listed in the landscape schedule are not particularly relevant to the site. As discussed above, any urban infill would not act to change or adversely affect the described juxtaposition of urban and wild lands and would result in no adverse effects on the ONL peaks or their dramatic character (refer to **Attachments K-M**).

### *Landscape capacity*

28. These schedules make assumptions on the landscape capacity for certain types of activity noting that some commercial and recreational activities may be absorbed. However, the schedules have considered that no urban expansion should occur within the landscape priority area. This part of the schedule, and in fact the whole of the schedule, is subject to a future submission and hearing process. It is anticipated that the use of the word no will be struck from the schedules and that a more fluid term such as limited is likely to be in its place. It is considered that appropriate, urban infill type development of the site would be appropriate and would not exceed the landscape's capacity to absorb change.

## **CONCLUSION**

29. Overall, it is considered that parts of the site have the potential to absorb appropriately designed urban infill type development. Our analysis has set out two potential areas and boundaries where there is landscape justification to locate future urban development. These two boundaries follow both the existing urban patterning of the landscape as well as the 560m contour line.

30. We have set out a series of analysis and design graphics which demonstrate the effect urban infill type development may have on the wider landscape. It is our assessment that urban infill type development, confined to these existing development standards, would not act to adversely affect landscape or visual amenity values, would maintain the attributes and values of the much broader ONL and could, to a degree enhance the attributes and values.

Prepared by:

Steve Skelton

A handwritten signature in black ink, appearing to read 'Steve Skelton'.

Registered Landscape Architect

Director, Patch Ltd

Reviewed by:

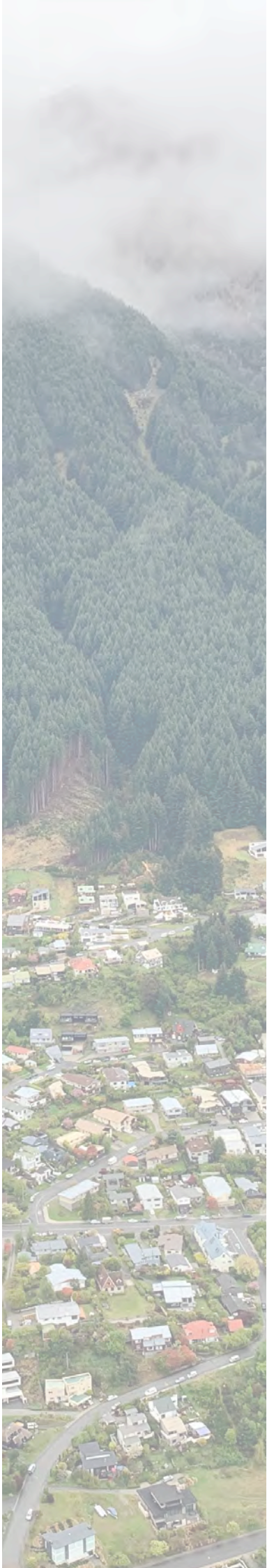
Jessica Zuban

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Landscape Architecture Associate







# WYNYARD CRESCENT

FERNHILL

Concept Package

13 July 2023





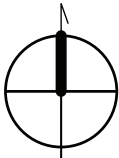
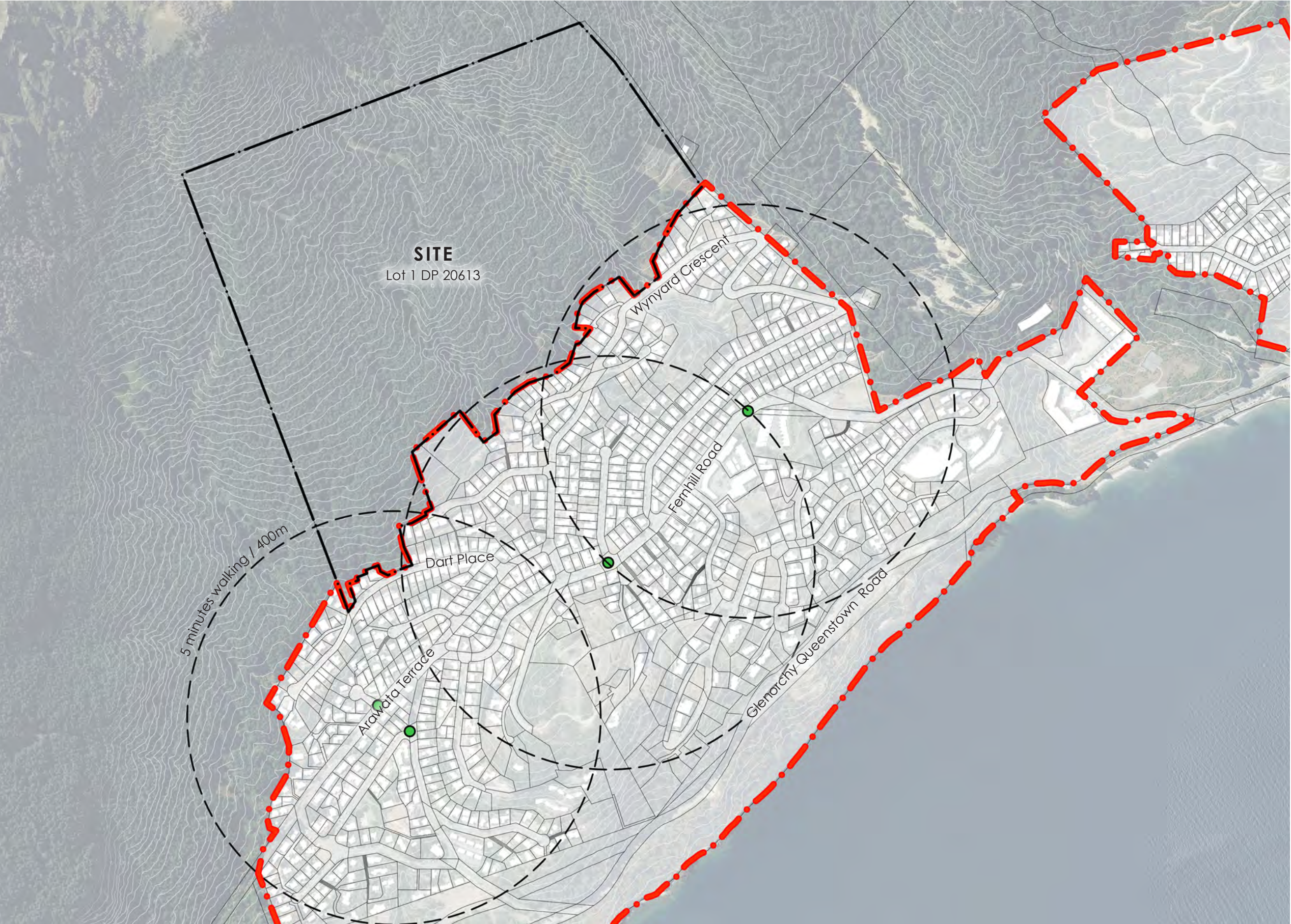
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Urban Growth Boundary



Bus stop

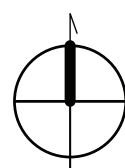




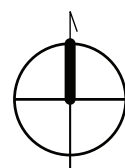
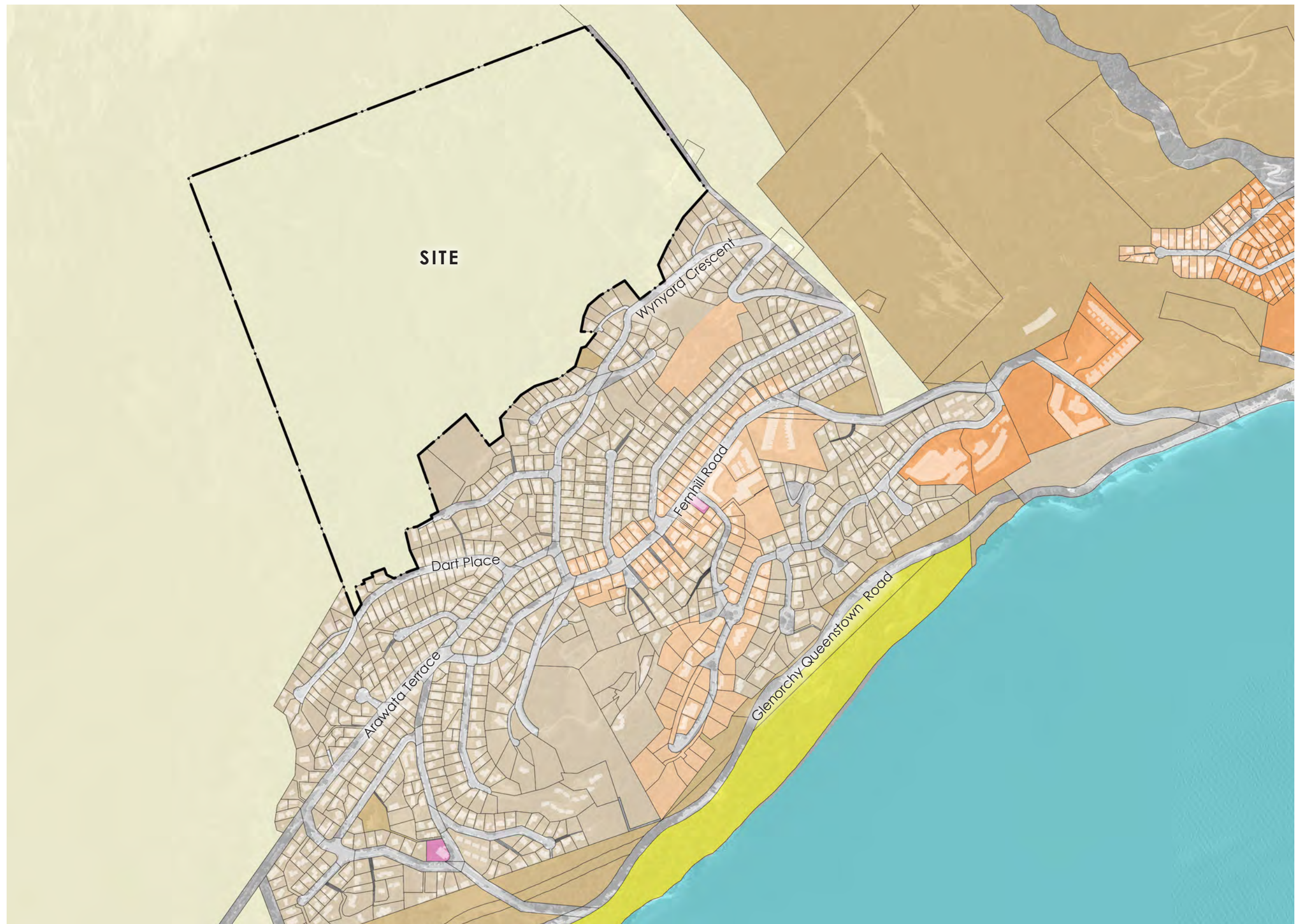
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Wāhi Tūpuna  
boundary





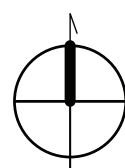
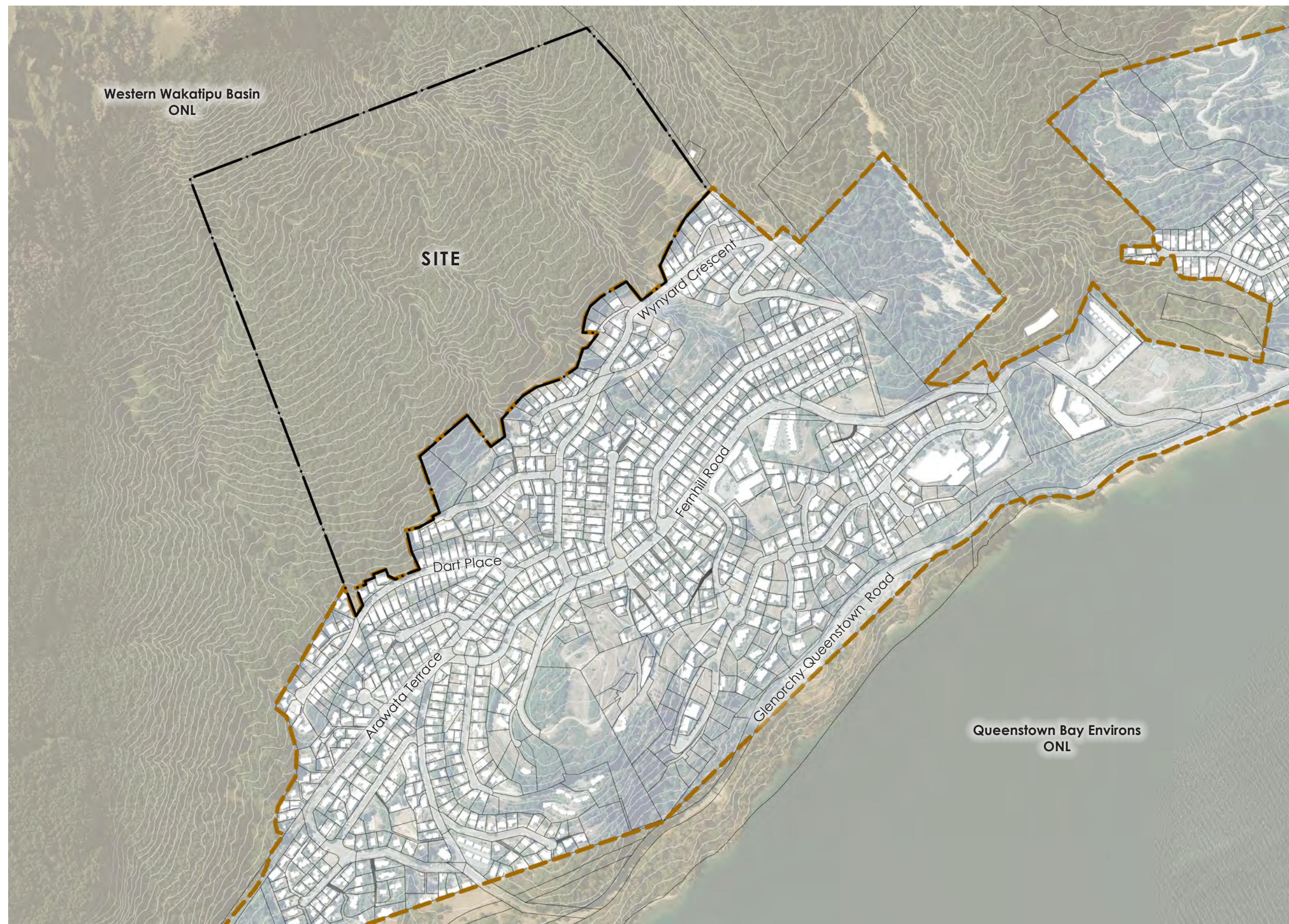
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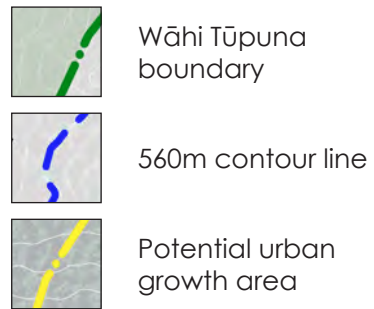
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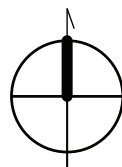
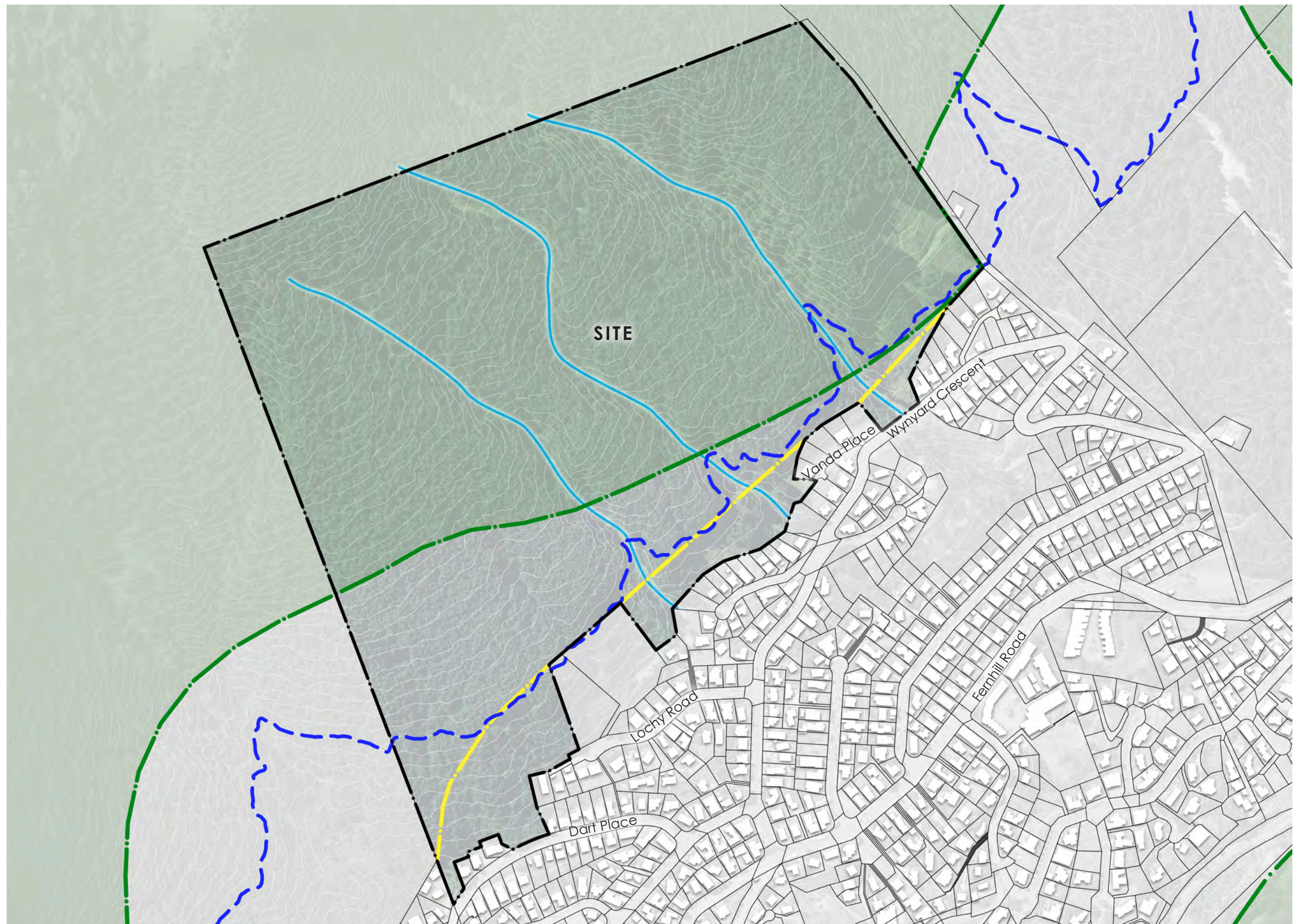
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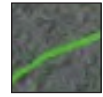


**Key:****Site Areas:**

Total site area (ONL):	56.68 ha
Outside Wāhi Tūpuna:	15.52 ha
Below 560m:	6.96 ha
Potential urban growth area:	4.66 ha





**Key:**

Wāhi Tūpuna  
boundary



560m contour line



Potential urban  
growth area

**Site Areas:**

Total site area (ONL): 56.68 ha







Outside Wāhi Tūpuna: 15.52 ha

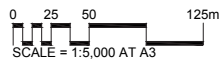
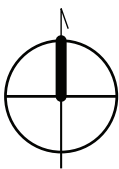
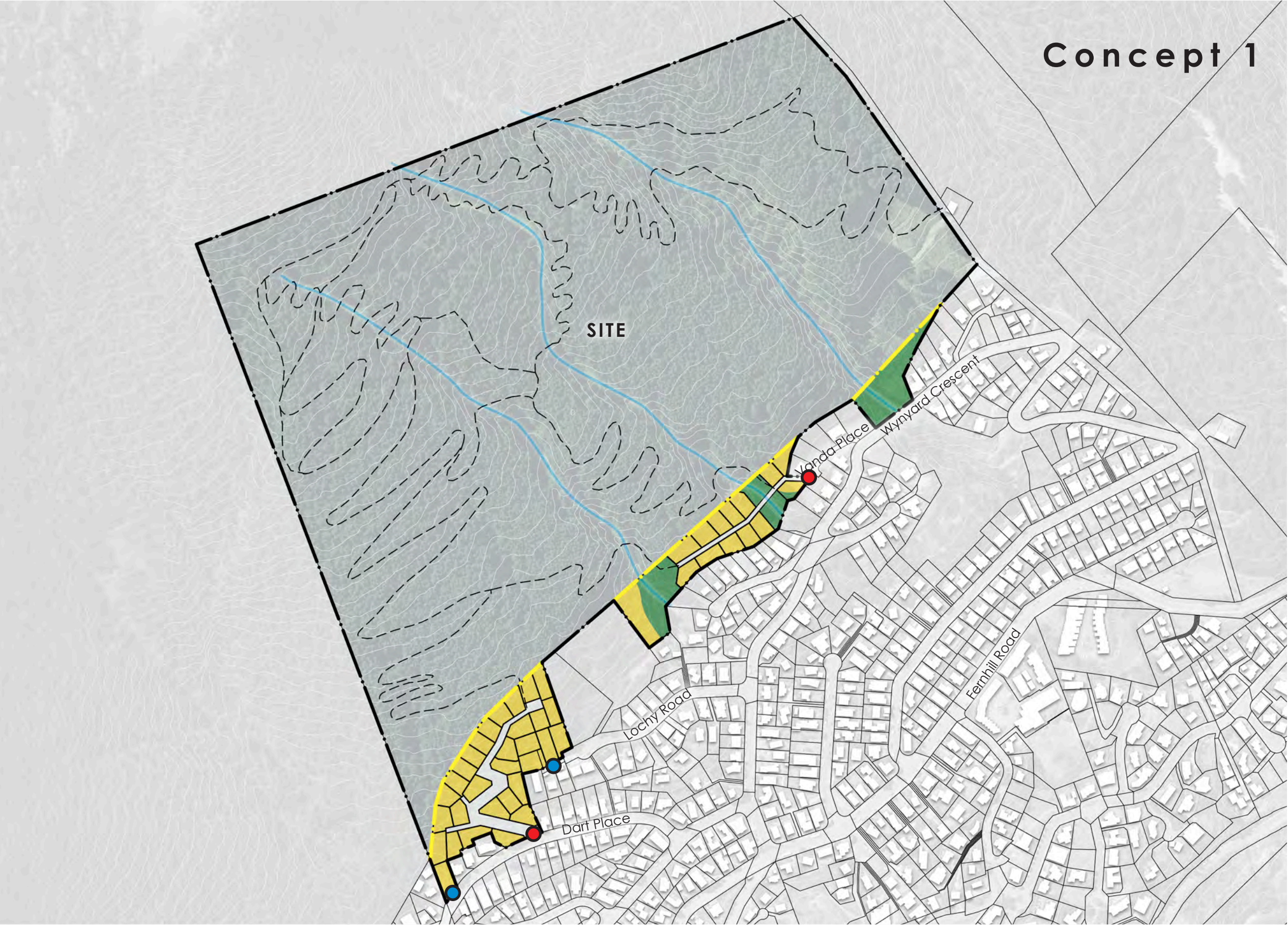
Below 560m: 6.96 ha

Potential urban growth  
area: 4.66 ha



Key:

-  Infill lower density suburban boundary
-  Reserve to improve freshwater quality
-  Potential urban growth pattern 46 lots ( ≈ 600m²)
-  Road access to existing roads
-  Lot access on existing roads
-  Indicative trail network





**Key:**

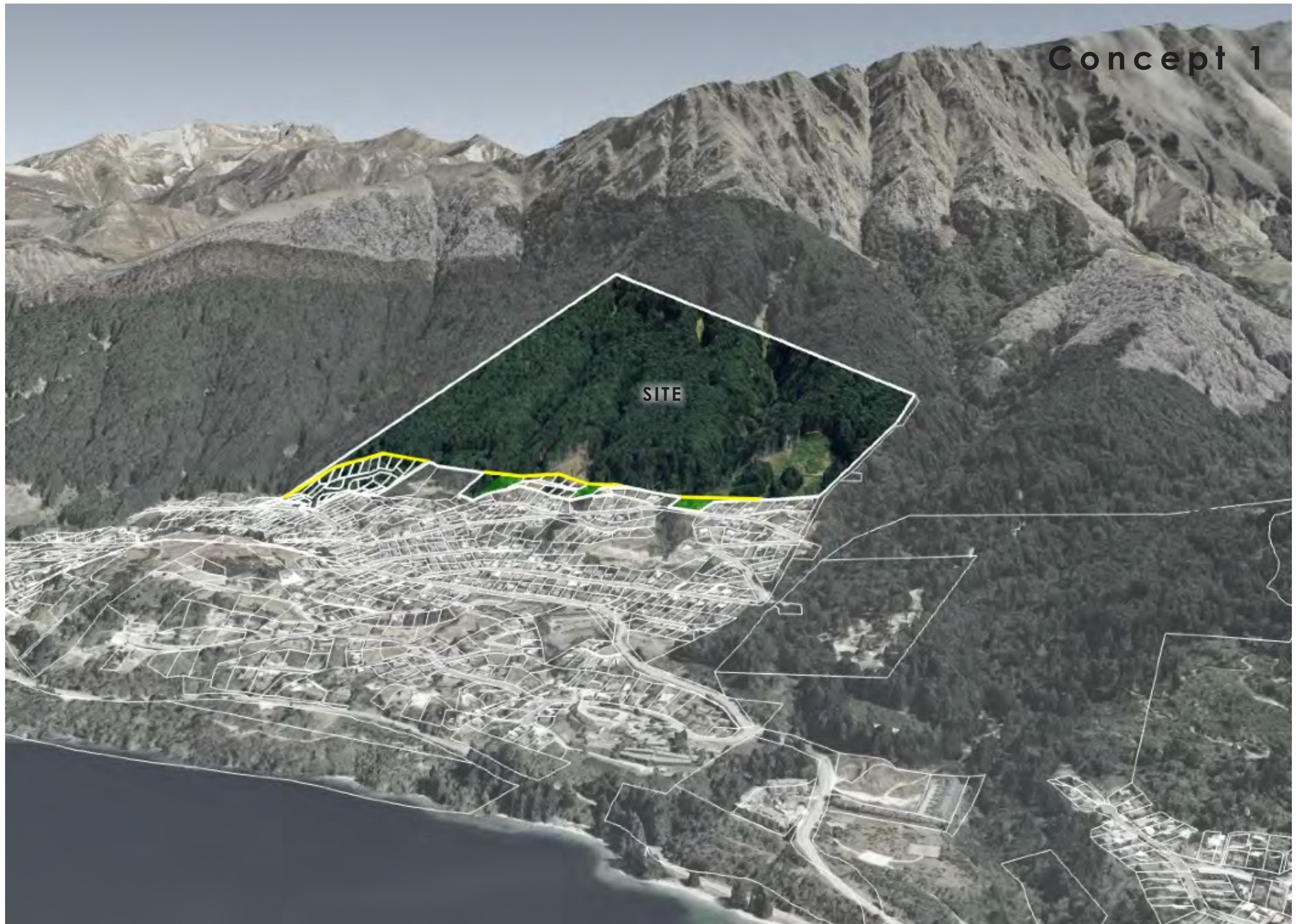
Infill lower density  
suburban boundary



Reserve to improve  
freshwater quality



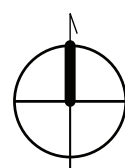
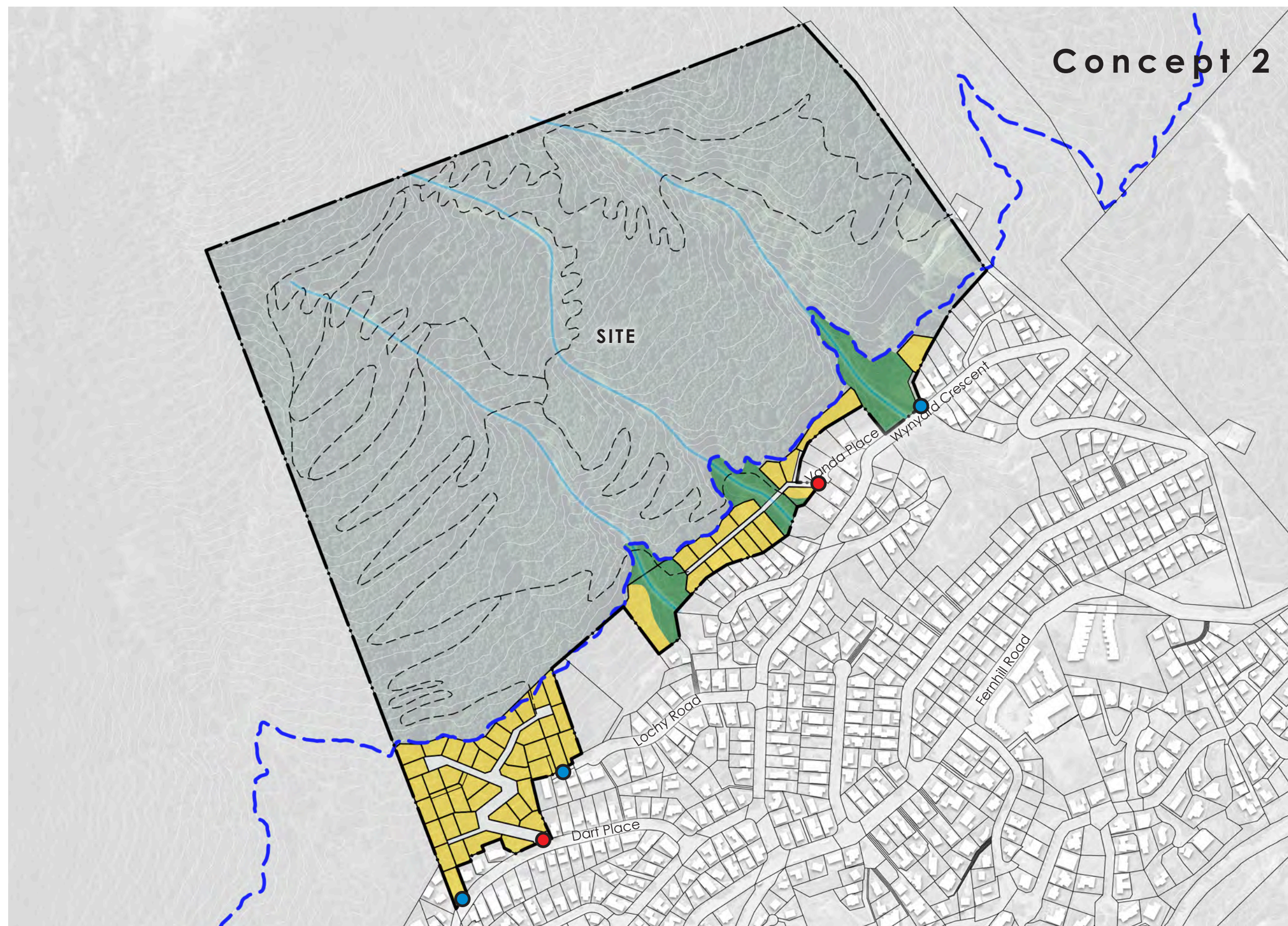
Reserve to improve  
freshwater quality  
46 lots (  $\approx 600\text{m}^2$  )



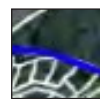


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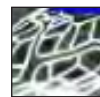
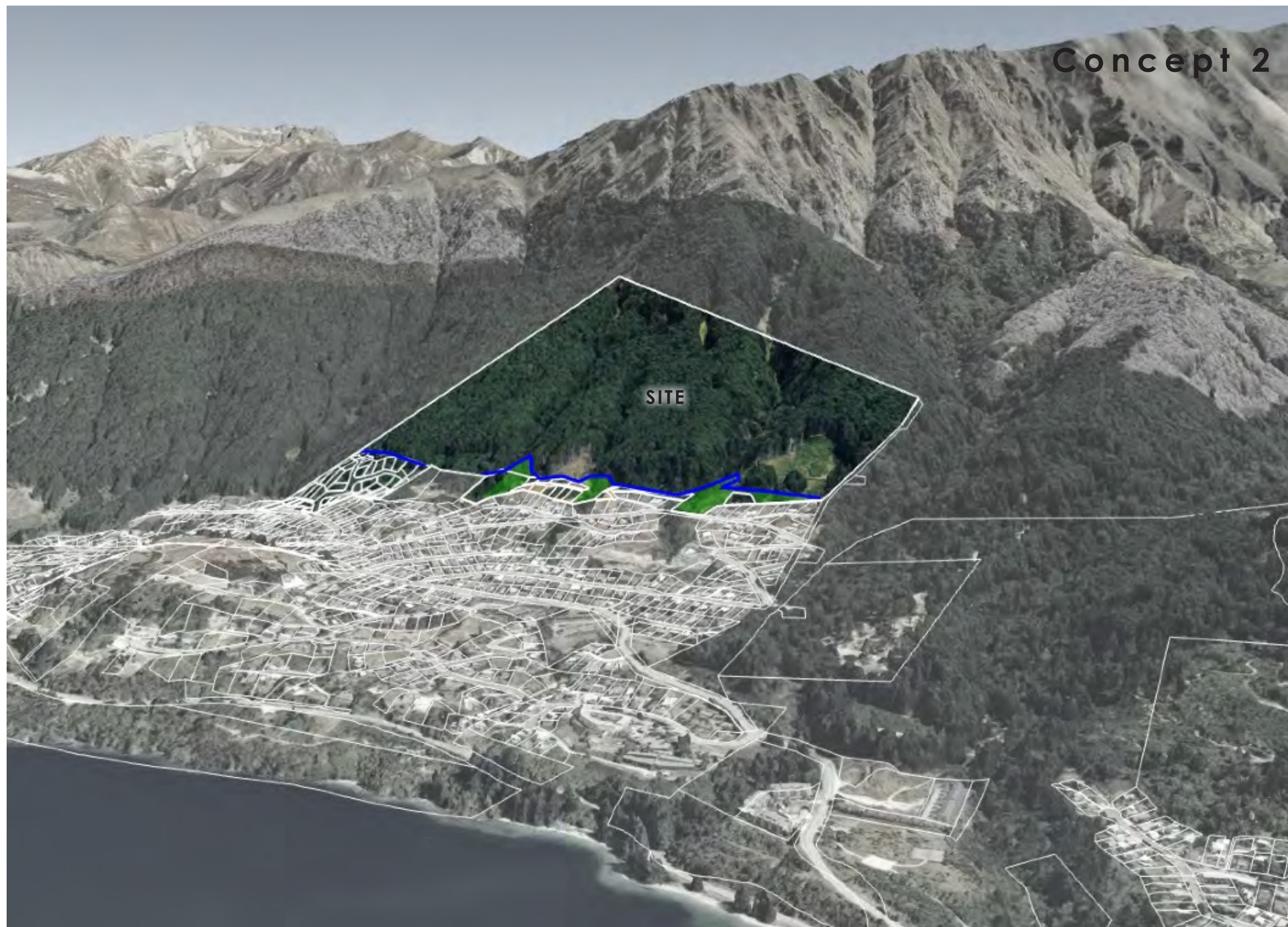
-  560m contour line
-  Reserve to improve freshwater quality
-  Reserve to improve freshwater quality 59 lots (≈ 600m²)
-  Road access to existing roads
-  Lot access on existing roads
-  Indicative trail network





**Key:**

560m contour line

Reserve to improve  
freshwater qualityReserve to improve  
freshwater quality  
59 lots (  $\approx 600\text{m}^2$  )**Concept 2****SITE**







# Concept 1





# Concept 2





**ATTACHMENT D**

Proposed amendments to 21.22.12 PA ONL Western Whakatipu Basin:  
Schedule of Landscape Values

## 21.22.12 PA ONL Western Whakatipu Basin: Schedule of Landscape Values

### General Description of the Area

The Western Whakatipu Basin PA ONL encompasses the steep south-eastern mountain slopes of Te Taumata o Hakitekura (Ben Lomond), the steep south and eastern mountain slopes of Bowen Peak and the two elevated roche moutonnée landforms of Te Tapunui (Queenstown Hill and including Sugar Loaf) and Pt 781. The PA ONF also takes in Waipuna (Lake Johnson) sitting in the ice-eroded gully between Pt 781 and Ferry Hill (a separate PA ONF). Collectively, the mountain slopes form the northern backdrop to Sunshine Bay, Fernhill and Queenstown, and the ~~western/north-western backdrop~~ **mountain setting** to Gorge Road and Arthurs Point. The PA ONL adjoins the Kimiākau (Shotover River) PA ONF along its north-eastern boundary in the vicinity of Arthurs Point.

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OS 189.10 Off Road Adventures Queenstown Limited.  
OS 138.17 Off Road Adventures Queenstown Limited.

### Physical Attributes and Values

Geology and Geomorphology • Topography and Landforms • Climate and Soils • Hydrology • Vegetation • Ecology • Settlement • Development and Land Use • Archaeology and Heritage • Tāngata whenua

### Important landforms and land types:

1. The steeply sloping foliated schistose mountain landforms of Te Taumata o Hakitekura (Ben Lomond 1,748m) and Bowen Peak (1,631m), which form part of the wall of mountains typical of the u-shaped glaciated valleys of which the Whakatipu Valley is an example.
2. The distinctive peaks of Te Taumata o Hakitekura (Ben Lomond) and Bowen Peak.
3. Exposed rock outcrops and bluffs in places.
4. The Ben Lomond saddle that extends on a west-east orientation between Ben Lomond and Bowen Peak and (in combination with the flanking peaks) separates the Whakatipu Valley from the Moke Creek Valley to the north.
5. The elevated ridgeline spurs extending southwards from the Ben Lomond saddle and taking in Pt 1121 and Cemetery Hill (812m, also known as 'Bobs Peak') immediately west of Queenstown (upon which the skyline Gondola and luge development is located).
6. The extensive ridgeline descending south-westwards from Te Taumata o Hakitekura (Ben Lomond) to Whakatipu Waimāori (Lake Whakatipu (ONL)) and taking in Pt 1580, Pt 1395, Pt 1335, Pt 1138 and Pt 850.
7. The small roche moutonnée landform (480m) towards the western edge of the PA, Whakatipu Waimāori (Lake Whakatipu (ONL)).
8. Glacial till deposits at the toe of the steep mountain slopes forming shallow localised shelves and throughout the more gently sloping lower reaches of gullies within the PA.
9. A localised area of ribs of bedrock on the lower-lying slopes to the west of Sunshine Bay.
10. The steeply sloping roche moutonnée glacial landforms of Te Tapunui (Queenstown Hill, 907m), Sugar Loaf (911m), and Pt 781, with a smooth 'up-glacier' slope to the southwest and south of each landform and a steeper rough 'plucked' down-glacier slope generally to the west, northwest, north and northeast.
11. The elevated saddle-like landform between Pt 781 and Ferry Hill, within which Lake Johnson is located.

**Commented [BG2]:** Typographical correction.



12. Scarps and hummocky topography on the southeast slopes of Queenstown Hill and the eastern side of Sugar Loaf which are indicative of historic large-scale landslides.

#### Important hydrological features:

13. One Mile Creek and its numerous steeply incised tributaries draining the south-eastern flanks of Ben Lomond to Whakatipu Waimāori (Lake Whakatipu).
14. The series of unnamed streams on either side of the One Mile Creek network, draining directly to Whakatipu Waimāori (Lake Whakatipu).
15. The steeply incised Horn Creek (or Bush Creek), McChesney Creek, Domestic Creek, Shady Creek, and numerous unnamed streams draining the southern and eastern sides of Bowen Peak to Kimitiākau (Shotover River PA ONF).
16. The shallow lowland, glacial lake of Waipuna (Lake Johnson, 399m). The lake is currently eutrophic (with poor water quality) due to elevated nutrient inputs from its catchment.
17. The numerous unnamed streams on the western, northern and south-eastern side of Te Tapunui (Queenstown Hill)/Sugar Loaf; the south side of Pt 781; between Sugar Loaf and Pt 781; and between Pt 781 and Ferry Hill.
18. Small kettle lakes and wetlands across the elevated slopes of Te Tapunui (Queenstown Hill).
19. The wetland at Matakauri Park, on the east side of Gorge Road.

#### Important ecological features and vegetation types:

20. Particularly noteworthy indigenous vegetation features include:
  - a. Pockets of grey shrubland dominated by matagouri and mingimingi occur throughout the low-lying rocky slopes of Bowen Peak adjacent to Gorge Road and Moonlight Track.
  - b. Kohuhu (*Pittosporum tenuifolium*) dominant (broadleaved) shrubland at the western end of the PA bordering the lake shore.
  - c. Pockets of mountain beech forest remnants in the gullies of One and Two Mile Creek and Bushy Creek.
  - d. Relic specimens of kowhai on the bluffs above McChesney Creek.
  - e. Subalpine shrubland and snow tussock grassland higher up above the bushline and areas of grey shrubland. The shrubs associated with the subalpine shrubland include species of the genera *Dracophyllum*, *Hebe*, *Leucopogon*, *Gaultheria*, *Pimelea* and *Ozothamnus*.
  - f. Parts of the beech forest in One Mile Creek and adjoining areas of subalpine shrubland and snow tussock grassland within the Ben Lomond Scenic Reserve.
  - g. Crack willows line much of the Waipuna (Lake Johnson) shoreline. Wetland vegetation comprising a mix of rushes and sedges at the southern and northern end of the lake where there is an absence of crack willows. Pockets of rushland and sedgeland also in isolated shoreline areas where gaps exist in the willow cover.
  - h. Swathes and scattered pockets of grey shrubland dominated by matagouri and mingimingi occupy the bluffs, rocky slopes and gullies on each of the roche moutonnée landforms, as well as some hillslopes such as above the eastern shoreline of Waipuna (Lake Johnson). Some of these shrublands are interspersed with hawthorn, sweet briar and elderberry.

- i. Extensive patches of manuka (*Leptospermum scoparium*) and scattered specimens of bog pine (*Halocarpus bidwillii*) on the higher western slopes of Te Tapunui (Queenstown Hill).
  - j. Short tussockland grassland covers large parts of the undulating crest terrain between Te Tapunui (Queenstown Hill) and Sugar Loaf.
  - k. A large wetland (sedgeland) called the Matakauri wetland on the outskirts of Queenstown by Gorge Road which is classified as a Regionally Significant Wetland.
21. Other distinctive vegetation types include:
- a. The almost continuous patterning of plantation *Pseudotsuga menziesii* (Douglas fir) forest throughout the mid and lower flanks of Te Taumata o Hakitekura (Ben Lomond) and the southern flanks of Bowen Peak.
  - b. Areas of pasture adjacent to Gorge Road as far as Watties Track.
  - c. The almost continuous patterning of plantation larch and Douglas fir forest throughout the southern lower flanks of Te Tapunui (Queenstown Hill).
  - d. The more fragmented patterning of wilding conifers intermixed with grey shrubland, hawthorn, sycamore, broom, gorse and crack willow throughout the southern lower flanks of Pt 781, the western and northern lower slopes of Sugar Loaf and western lower slopes of Te Tapunui (Queenstown Hill).
  - e. Open pasture and scattered scrub throughout the elevated steep slopes and crest of Te Tapunui (Queenstown Hill), Sugar Loaf and Pt 781.
  - f. Grazed pasture with scattered shelterbelts (including poplars) and clusters of pine and willow trees throughout the saddle between Pt 781 and Ferry Hill.
  - g. Amenity and shelter plantings around the few scattered rural and rural living dwellings at the southern end of Waipuna (Lake Johnson) and on the north-western side of Sugar Loaf.
  - h. Amenity plantings around the two groupings of dwellings on the south side of Te Tapunui (Queenstown Hill), near the entrance to the Queenstown Hill Time Walk.
22. Waipuna (Lake Johnson) is a SNA in the District Plan. The riparian vegetation is of significance to aquatic values.
23. Scrub and exotic trees/weeds throughout the lower mountain slopes to the west of Sunshine Bay and adjacent Gorge Road, Arthurs Point and the Moonlight Track.
24. Animal pest species include feral goats, feral cats, ferrets, stoats, weasels, hares, rabbits, possums, rats and mice.
25. Plant pest species include wilding conifers, hawthorn, buddleia, elderberry, sycamore, broom, cotoneaster and gorse.

#### Important land-use patterns and features:

- 26. Grazed pasture across the low-lying flatter land on the eastern side of the PA adjacent to Gorge Road, parts of the slopes to the west of Arthurs Point and the majority of Te Tapanui (Queenstown Hill), Sugar Loaf, Pt 781 and around Waipuna (Lake Johnson). Very low-intensity grazing across the elevated pastoral slopes. Associated with this activity are a network of farm tracks, fencing and farm buildings sheds.
- 27. The proliferation of plantation and wilding conifers around the edges of the PA that define the interface between much of the PA and urban Queenstown/Arthurs Point.

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28. The gondola (towers, cableway and cabins in a cleared area of Douglas fir forest), luge tracks and chairlift and associated buildings (top and bottom stations, maintenance workshop), café/restaurant/terminal building, service buildings, lighting, signage, jumping-off point for paragliders, vehicular access track, star gazing platforms, bungee platform and associated buildings, zip lining and associated tree top huts and network of mountain bike trails (Queenstown Mountain Bike Park) ~~on Cemetery Hill~~.
29. The swathe of Community Purpose and Informal Recreation zoned land across the slopes of Cemetery Hill facing towards Queenstown (where the Skyline gondola, luge, and mountain bike tracks are) and along either side of the lower reaches of One Mile Creek.
30. The Queenstown Hill Time Walk that leads from near the Queenstown city centre (Belfast Street) to the summit of Te Tapunui (Queenstown Hill) and coincides with Informal Recreation zoned land across the lower south-western slopes of Te Tapunui (Queenstown Hill).
31. An area of Community Purposes zoned land adjacent the northern edge of the Urban Growth Boundary (UGB) on Gorge Road and coinciding with Matakauri Park wetland and boardwalk.
32. The Tiki Trail, Fernhill Loop and Ben Lomond tracks near Queenstown; the Arawata Track at the western end of Sunshine Bay; and the Moonlight Track on the north-western side of Arthurs Point. Associated with these tracks are signage, stiles, and seating.
33. The general absence of rural and rural living buildings within the PA, excepting a scattering at the north-western end of Arthurs Point, a scattering along the Gorge Road valley floor (including adventure tourism related facilities and activities), a very small pocket of urban dwellings at the toe of the Queenstown Time Walk, and the small cluster of rural living dwellings at the south end of Waipuna (Lake Johnson).
34. An unformed road leading from Gorge Road up the lower slopes on the east side of Bowen Peak; from Wynyard Crescent up the mountain slopes; and from Lomond Crescent up the mountain slopes (Ben Lomond Track).
35. Short stretches of unformed road: at the north end of Hansen Road (south) linking to Waipuna (Lake Johnson); at the southern end of Hansen Road (north) extending southwards along the western side of Ferry Hill; and from the western end of Tucker Beach Road extending southwards to the lower northern slopes of Pt 781.
36. Infrastructure is evident within the PA and includes: Aurora distribution lines around the lower slopes of Ben Lomond to the west of Sunshine Bay, along the Gorge Road corridor and on the south-eastern side of the area, and over the saddle near Waipuna (Lake Johnson); water reservoir designations near Greenstone Place and Scott Place in Fernhill; and a firefighting pond near the luge.
37. The UGB associated with Queenstown and the Fernhill/Sunshine Bay suburban area which adjoins the southern edges of the PA, and the Arthurs Point UGB which adjoins the north-western margins of the PA.
38. Other neighbouring land uses which have an influence on the landscape character of the area with particular regard to adjacent urban areas, due to their scale, character, and/or proximity. These areas include: the urban residential and commercial development adjoining the southern edges of the PA (taking in Sunshine Bay, Fernhill, Queenstown and Frankton); the urban residential and commercial development adjoining the north-western edges of the area (including Arthurs Point); the Queenstown Mountain Bike Club pump track area used for recreation and events on Kerry Drive near the south boundary; rural living development towards the western end of Tucker Beach; and Gorge Road, Glenorchy Queenstown Road and Frankton Road (SH6A).

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OS 189.20 Queenstown Adventure Park (1993) Limited.  
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OS 138.25 Off Road Adventures Queenstown Limited.

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**Commented [BG10]:** OS 75.6 Peter Clark.

**Commented [BG11]:** OS 189.22 Queenstown Adventure Park (1993) Limited.  
OS 138.26 Off Road Adventures Queenstown Limited.

#### Important archaeological and heritage features and their locations:

39. Queenstown Powerhouse, One Mile Creek (District Plan reference 96).
40. Old McChesney Bridge Abutment Remains, Arthurs Point (District Plan reference 104, archaeological site E41/236).

41. Various inter-related complexes of gold sluicings, tailings, water races, dams, and associated domestic sites in the area (for example, archaeological sites E41/204, E41/228, and E41/279).
42. A protected horse chestnut (*Aesculus hippocastanum*) on Gorge Road (western side of Te Tapunui (Queenstown Hill)) and a grouping of protected English oaks (*Quercus robur*) at the south-western end of Waipuna (Lake Johnson).
43. Various archaeological features associated with goldmining across the area (e.g., sluicings, tailings, water races, hut sites, dams, etc.), especially in the area around Waipuna (Lake Johnson).
44. Archaeological features relating to historic farming in the area around Waipuna (Lake Johnson).
45. Historic walking track from Queenstown to the top of Te Tapunui (Queenstown Hill).

#### Mana whenua features and their locations:

46. The entire area is ancestral land to Kāi Tahu whānui and, as such, all landscape is significant, given that whakapapa, whenua and wai are all intertwined in te ao Māori.
47. Much of the ONL is mapped as the wāhi tūpuna Te Taumata o Hakitekura (Ben Lomond) or Te Tapunui wāhi tūpuna. The very northern extent overlaps the Kimiākau (Shotover River) wāhi tūpuna.

#### Associative Attributes and Values

Mana whenua creation and origin traditions • Mana whenua associations and experience • Mana whenua metaphysical aspects such as mauri and wairua • Historic values • Shared and recognised values • Recreation and scenic values

#### Mana whenua associations and experience:

48. Kāi Tahu whakapapa connections to whenua and wai generate a kaitiaki duty to uphold the mauri of all important landscape areas.
49. Te Taumata-o-Hakitekura is named after Hakitekura, a Kāti Māmoe woman who was the first person to swim across Whakatipu wai-māori Whakatipu Waimāori. After watching other young women from the mountains attempting to outswim each other, she decided that she wanted to outdo them. She got a kauati (a stick used to start fire) from her father, and a bundle of dry raupō as kindling. The next morning, Hakitekura set out from Tāhuna (the flat land where Queenstown now stands). With the kauati and raupō bound tightly in harakeke (flax) to keep them dry, she swam across the lake in darkness, with the bundle strapped to her. When Hakitekura was discovered missing, her father remembered his daughter's request for a kauati, and a waka was sent across the lake to bring her back. The mountains where she would look across the lake were thereafter known as Te Taumata-a-Hakitekura Te Taumata-o-Hakitekura (The Resting Place of Hakitekura).
50. The name Te Tapunui signifies a place considered sacred to Kāi Tahu whānui both traditionally and in the present.
51. Kimiākau is part of the extensive network of mahika kai (food & resource gathering) and traditional travel routes in the area.
52. The mana whenua values associated with this ONF include, but may not be limited to, wāhi tapu, wāhi taoka, ara tawhito, mahika kai and nohoaka.

#### Important historic attributes and values:

53. The naming of the Ben Lomond, after Ben Lomond in Scotland by the early shepherd, Duncan McAusland.

**Commented [BG12]:** OS 77.39 Kai Tahu Otago.  
OS 188.39 Elisha Ebert-Young.

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OS 188.48 Elisha Ebert-Young.



54. Early European interactions with the creeks in the area as sources of water, power, and gold, as well as obstacles that needed to be bridged.
55. Gold mining in the area and the associated physical remnants.
56. Early farming around Waipuna (Lake Johnson).
57. The contextual value of Te Tapanui (Queenstown Hill) as a landscape feature that historically defined communication routes around the Whakatipu Basin.
58. The importance of Te Tapanui (Queenstown Hill) as an early tourist destination.

#### Important shared and recognised attributes and values:

59. The descriptions and photographs of the area in tourism publications.
60. The popularity of the postcard views from Cemetery Hill (Bob's Peak) ~~but over Queenstown~~, Whakatipu Waimāori (Lake Whakatipu), Te Tapanui (Queenstown Hill), Walter Peak, Cecil Peak, the Remarkables, Te Taumata-o-Hakitekura (Ben Lomond) and the broader mountain context, as an inspiration/subject for art and photography.
61. The very high popularity of the Skyline Gondola and luge facility and the Queenstown Time Walk (both described below). The very close proximity of these recreational features to Queenstown urban area also plays a role.
62. The identity of Cemetery Hill (Bob's Peak), Te Tapanui (Queenstown Hill) and, further afield, Te Taumata-o-Hakitekura (Ben Lomond) as part of the dramatic backdrop to Queenstown.
63. ~~The popularity of the postcard views from Te Tapanui (Queenstown Hill) out over Lake Whakatipu, Cecil Peak, Walter Peak, The Remarkables, Te Taumata-o-Hakitekura (Ben Lomond), and the broader mountain context, as an inspiration/subject for art and photography.~~
64. The identity of Bowen Peak as part of the dramatic backdrop to Arthurs Point.

**Commented [BG14]:** Amended for consistency as the other outlooks are referred to in a general sense.  
OS42.5 Sunnyheights Limited.

**Commented [BG15]:** Combined from [63] to reduce repetition.  
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OS42.5 Sunnyheights Limited.

#### Important recreation attributes and values:

65. Walking, running, mountain biking, paragliding, lugging, riding the gondola, bungee jumping and enjoying the view from the café/restaurant facilities on Cemetery Hill (Bob's Peak).
66. Walking and running on the Tiki Trail, Ben Lomond Track, Arawata Track and the Moonlight Track.
67. Mountain biking within the Queenstown Mountain Bike Park and trails within and around the Wynyard Jump Park.
68. Walking, running, and picnicking on the Queenstown Time Walk which includes several heritage interpretation panels, lookout points and the 'Basket of Dreams' sculpture by Caroline Robinson.
69. Walking and running on the Matakauri Park boardwalk (near Gorge Road).
- 69a Adventure tourism tracks, facilities and activities in the Gorge Road valley.
70. Trout fishing at Waipuna (Lake Johnson).
71. Glenorchy-Queenstown Road and Gorge Road as key scenic routes in close proximity.

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OS 189.23 Off Road Adventures Queenstown Limited.  
OS 138.7 Off Road Adventures Queenstown Limited.  
OS 138.8 Off Road Adventures Queenstown Limited.

## Perceptual (Sensory) Attributes and Values

Legibility and Expressiveness • Views to the area • Views from the area • Naturalness • Memorability • Transient values • Remoteness / Wildness • Aesthetic qualities and values

### Legibility and expressiveness attributes and values:

72. The area's natural landforms, land type, and hydrological features (described above), which are highly legible and highly expressive of the landscape's formative glacial processes.
73. Indigenous gully and wetland plantings which reinforce the legibility and expressiveness values throughout the area.

### Particularly important views to and from the area:

74. The postcard views from vantage points on Cemetery Hill (Bob's Peak) ~~out over Queenstown~~, Whakatipu Waimāori (Lake Whakatipu), Te Tapunui (Queenstown Hill), Walter Peak, Cecil Peak, the Remarkables, ~~Te Taumata-o-Hakitekura (Ben Lomond)~~, and the broader mountain context.
75. The spectacular panoramic views from the Ben Lomond saddle and Ben Lomond summit out over the Whakatipu Valley to the south (including the lake) and the rugged and dramatic expanse of Harris and Richardson mountains ranges to the north.
76. ~~The postcard views from Te Tapunui (Queenstown Hill) over Lake Wakatipu, the Remarkables, Ben Lomond and the broader mountain context of Queenstown.~~
77. The highly attractive short to long-range views from the Moonlight Track along the vegetation-clad gorge of the Shotover Corridor, across the rugged and largely undeveloped slopes of Mount Dewar and northwards to The Point.
78. The appealing short to long-range views from the Arawata Track across the mixed bush and scrub-clad lake margins to Whakatipu Waimāori (Lake Whakatipu) and Cecil Peak.
79. The engaging mid to long-range views from Queenstown, Fernhill, Sunshine Bay, Te Nuku-o-Hakitekura (Kelvin Heights), Whakatipu Waimāori (Lake Whakatipu), parts of the Queenstown Trail network, and the Glenorchy-Queenstown Road, in which the largely forested slopes of Te Taumata-o-Hakitekura (Ben Lomond) form the backdrop to Queenstown. The bold contrast between the urban development throughout the lower flanks of the hill and the elevated wooded slopes is memorable and of importance to the identity of Queenstown as a settlement tucked into the base of a mountain.
80. The appealing long-range views from more distant elevated vantage points such as the Remarkables Ski Field Access Road (and lookouts) in which the visibility of Te Taumata-o-Hakitekura (Ben Lomond) peak and the connection of Cemetery Hill (Bob's Peak) and Te Taumata-o-Hakitekura (Ben Lomond) to the broader glacial landscape confers a sense of grandeur to the outlook.
81. Dramatic close and mid-range views from Gorge Road to the rugged and vegetation-pocked slopes of Bowen Peak. The somewhat wild and unkempt character of the slopes where rocky outcrops and patches of scrub and grey shrubland dominate at relatively close range, combined with the broader mountain context (Sugar Loaf and Te Tapanui (Queenstown Hill)), add to the spectacle.
82. Dramatic mid and long-range views from Arthurs Point, the Kimiākau (Shotover River) ONF, the western Whakatipu Basin / Littles Stream area and sections of the trail network coinciding with this part of the basin, to the rugged eastern and north-eastern slopes of Bowen Peak and Sugar Loaf. In views the mountainous context within which the largely undeveloped and open mountain-scape is seen, together with its visual dominance (as a consequence of its scale, proximity, and appearance), adds to the appeal of the outlook.

**Commented [BG18]:** Amended for consistency as the other outlooks are referred to in a general sense.  
OS42.5 Sunnyheights Limited.

**Commented [BG19]:** Combined from [76] to reduce repetition.  
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OS42.5 Sunnyheights Limited.



83. Engaging and attractive short to long-range views from the Frankton Arm, Frankton (including the airport), SH6, and Kelvin Peninsula to the smoother south-facing slopes of Te Tapunui (Queenstown Hill) and the more irregular profile of Pt 781 (seen in combination with the cone like peak of Ferry Hill which is a separate PA ONF). In more distant views (e.g. Frankton Arm and Kelvin Peninsula), this part of the PA is perceived as a continuous, albeit varied, landform feature with Ferry Hill PA ONF. The almost unbroken patterning of vegetation ~~plantation~~ forest along the southern flanks of Te Tapunui (Queenstown Hill) and wilding conifers intermixed with grey shrubland and scrub throughout the southern lower flanks of Pt 781, together with its generally undeveloped character, forms a memorable contrast with the urban development below and the more open pastoral slopes sitting above, which reinforces the impression of coherence. In longer range views from many of the more distant locations to the south, there is a clear appreciation of the roche moutonnée landform profile and the waters of the Frankton Arm seen in the foreground of view, along with the often-snow-capped mountains of Ben Lomond and Coronet Peak in the background add to the appeal. In closer range views (e.g. Frankton and SH6), intervening landforms, vegetation and/or built development curbs the field of view in places. Despite the limited expanse of the feature visible, the contrast established by the natural landform seen within an urban context adds to the memorability and appeal of such views.
84. Attractive mid to long-range views from Queenstown, Lake Whakatipu, and the Glenorchy-Queenstown Road, in which the smoother 'up-glacier' largely forested south-western slopes of Te Tapunui (Queenstown Hill) form the backdrop to Queenstown. The bold contrast between the urban development throughout the lower flanks of the hill and the elevated wooded slopes is memorable and of importance to the identity of Queenstown as a settlement tucked into the base of a mountains. From more distant vantage points, the connection of Te Tapunui (Queenstown Hill) to the broader glacial landscape is more legible and adds a sense of grandeur to the outlook.
85. Attractive mid and long-range views from the Fitzpatrick Basin, Dalefield, Hawthorn Triangle, the elevated flanks and foothills associated with Slope Hill and sections of Queenstown Trail coinciding with this part of the basin, to the more irregular steep profile of Pt 781 and the more rounded, albeit rugged, northern side of Sugar Loaf. In closer range views, the expanse of the PA is curtailed by intervening landform and vegetation; however, there is an increased appreciation of the localised rocky outcrops, scarps, and hummocky terrain of the landforms adding to their appeal. In some of these views, there is an appreciation of the band of rural living development (Tucker Beach) along the north side of the Waipuna (Lake Johnson) saddle along with the poplar shelterbelts, scattered shade trees. Nevertheless, from this orientation, the large-scale and distinctive sculptural form of the landforms and their generally undeveloped character make them memorable.
86. Highly attractive close and mid-range views across Waipuna (Lake Johnson), seen enclosed by the steeply rising roche moutonnée features of Pt 781 and Ferry Hill (ONF). Scattered largely exotic lake edge, shelterbelt, shade tree, and amenity plantings (around dwellings) add to the scenic appeal.
87. Engaging and seemingly 'close-range' views from planes approaching or exiting Queenstown airport via the Frankton Arm. Such views offer an appreciation of the roches moutonnées and the broader glacial landscape context within which the PA ONL is set.
88. In all of the views, the dominance of 'natural' landscape elements, patterns, and processes evident within the ONL, along with the generally subservient nature of built development within the ONL and, in the case of the southern and north-eastern sides of the area, the contrast with the surrounding 'developed' landscape character, underpins the high quality of the outlook.

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#### Naturalness attributes and values:

89. The 'seemingly' undeveloped character of Western Whakatipu Basin PA ONL set within a largely urban context (Queenstown and Arthurs Point), which conveys a relatively high perception of naturalness. While modifications related to its forestry, pastoral, recreational, and infrastructure uses are visible, the very low number of buildings and the limited visibility (excepting the gondola etc described below), limits their influence on the character of the area as a natural landscape.

90. The irregular patterning and proliferation of grey shrubland, exposed rock faces, and scrub in places, adds to the perception of naturalness.
91. While the gondola forms a bold manmade 'cut' up the hillside, with a sizeable terminal building and luge development atop Cemetery Hill (Bob's Peak), the movement of the gondola cabins together with the connection the gondola and associated development establishes between the mountain setting and Queenstown adds a degree of interest to the view, meaning that it is not an overwhelmingly negative visual element. Put another way, these landscape modifications make an important contribution to Queenstown's recreational values (see above), suggesting a degree of landscape 'fit'. The scale of the seemingly 'undeveloped' mountain setting within which this development is viewed together with its strong visual connection to Queenstown also play a role in this regard. At night, the patterning of lights up the mountain slopes forms a bold contrast to the darkness of the surrounding mountain slopes. Again, it is the very close proximity of the area to Queenstown that lends a visual fit.
92. The forestry plantings across the south and southeast flanks of Te Tapunui (Queenstown Hill), Te Taumata-o-Hakitekura (Ben Lomond) and parts of Bowen Peak contribute a reduced perception of naturalness. However, the underlying natural (and largely unmodified) schistose mountain and roche moutonnée landform character remains legible and dominant, thus ensuring this part of the area displays at least a moderate-high level of naturalness. The visual appearance of these parts of the PA during and after harvesting cycles forms a prominent negative visual element within the broader landscape setting and serves to (temporarily) further reduce the perception of naturalness in this part of the PA.

#### Memorability attributes and values:

93. The appealing and engaging views of the largely undeveloped mountains and largely undeveloped and legible roche moutonnée landforms from a wide variety of public vantage points. The juxtaposition of the mountains and landforms within a largely urban context, along with the magnificent broader mountain and lake context within which they are seen in many views, are also factors that contribute to memorability.
94. The 'close up' experience of the alpine setting that the PA affords for many residents and visitors to Queenstown as a consequence of the relatively high accessibility of the area (via the tracks and gondola in very close proximity to the town centre).
95. The panoramic alpine landscape views afforded from: the Ben Lomond track, saddle and peak; and the top of Te Tapunui (Queenstown Hill).
96. The sense of Queenstown and Arthurs Point tucked in at the toe of a majestic mountain setting.
97. The sense of Waipuna (Lake Johnson) as a 'hidden gem' tucked away in the hillslopes by Frankton.

#### Transient attributes and values:

98. Seasonal snowfall and the ever-changing patterning of light and weather across the mountain and roche moutonnée slopes.
99. Autumn leaf colour and seasonal loss of leaves associated with the exotic vegetation.

#### Remoteness and wildness attributes and values:

100. A strong sense of the sublime as a consequence of the sheer scale, dramatic character and undeveloped appearance of the mountain and roche moutonnée which is evident: on the Ben Lomond track above the Gondola and luge development; along Gorge Road (away from existing built development and adventure tourism related activities); and across the northern part of the PA which contributes a sense of remoteness and wildness to the wider setting (including Arthurs Point, Kimiākau (Shotover River) ONF and the western part of the Whakatipu Basin), despite the more developed immediate context.

#### Aesthetic qualities and values:

101. The experience of the values identified above from a wide range of public viewpoints.

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102. More specifically, this includes:

- a. The highly attractive and memorable composition created by the generally undeveloped, vegetation-dominated, mountain landforms and roche moutonnée juxtaposed beside an urban context and/or an (ONF/L) lake or river context.
- b. At a finer scale, the following aspects contribute to the aesthetic appeal:
  - i. The large-scale and dramatic character of the steep mountain landforms backdropping Queenstown and Arthurs Point.
  - ii. The sculptural peaks of Te Taumata-o-Hakitekura (Ben Lomond) and Bowen Peak.
  - iii. The ever-changing play of light and weather patterns across the mountain and roche moutonnée slopes.
  - iv. The more rugged and wild character of the eastern side of Bowen Peak.
  - v. The distinctly rugged character of the west, northwest, north and northeast sides of each of the roche moutonnée landforms and the more coherent appearance of the southwest and south of each as a consequence of the landform and vegetation character and patterns.
  - vi. The rounded tops of Te Tapunui (Queenstown Hill) and Sugar Loaf, and the more rugged and irregular profile of Pt 781.
  - vii. The open and pastoral character of Pt 781 and the top of Te Tapunui (Queenstown Hill).
  - viii. The contained and enclosed nature of Waipuna (Lake Johnson) set within a largely pastoral context interspersed with largely exotic plantings.
  - ix. The general confinement of visible built development to ~~two~~ three ~~four~~ distinct locations: Cemetery Hill (gondola, luge, etc.); parts of the Gorge Road valley floor (rural living, rural buildings, and adventure tourism related buildings, facilities and tracks); The lower slopes of Ben Lomond (Fernhill) and near Arthurs Point (limited scattering of rural living development).

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## Summary of Landscape Values

Physical • Associative • Perceptual (Sensory)

Rating scale: seven-point scale ranging from **Very Low** to **Very High**.

very low	low	low-mod	moderate	mod-high	high	very high
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These various combined physical, associative, and perceptual attributes and values described above for PA ONL Western Whakatipu Basin can be summarised as follows:

103. **High physical values** due to the high-value landforms, vegetation features, habitats, species, hydrological features and mana whenua features in the area.

104. **High associative values** relating to:

- a. The mana whenua associations of the area.
- b. The historic features and associations of the area.

- c. The very strong shared and recognised values associated with the area and its adjacency to urban areas.
- d. The significant recreational attributes of Cemetery Hill (Bob's Peak), Ben Lomond and Te Tapanui (Queenstown Hill) and trout fishing in Lake Johnson.

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#### 105. High perceptual values relating to:

- a. The high legibility and expressiveness values of the area deriving from the visibility and abundance of physical attributes that enable a clear understanding of the landscape's formative processes.
- b. The high aesthetic and memorability values of the area due to its distinctive and appealing composition of natural landscape elements. The visibility of the area from Queenstown, Arthurs Point, Sunshine Bay, Fernhill, Te Nuku-o-Hakitekura (Kelvin Heights), the scenic routes of Glenorchy-Queenstown Road and Gorge Road, parts of the Queenstown Trail network, the Ladies Mile corridor, the western side of the Wakatipu Basin, the airport approach path and the Remarkables Ski Field Access Road (and lookouts), along with the area's transient values, play an important role.
- c. A moderate-high to high perception of naturalness arising from the dominance of more natural landscape elements and patterns across the PA.
- d. The identity of the PA as a natural and dramatic landscape backdrop to the PA's adjacent urban areas of Fernhill, Sunshine Bay, Queenstown, Arthurs Point, Frankton as well as ~~the~~ the western side of the more rural Whakatipu Basin.
- e. The sense of Waipuna (Lake Johnson) as a 'hidden gem' tucked away in the hillslopes by Frankton.
- f. A ~~strong~~ sense of remoteness and wildness throughout the elevated parts of Te Taumata-o-Hakitekura (Ben Lomond), along the western and north side of Te Tapanui (Queenstown Hill), the northern sides of Sugar Loaf and Pt 781 and on the slopes of Bowen Peak near Arthurs Point.

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OS 75.11 Peter Clark.  
OS 142.2 Hansen Family Partnership.  
OS 142.41 Hansen Family Partnership  
OS 186.7 Richard Kemp.  
OS 186.10 Richard Kemp.  
OS 189.2 Queenstown Adventure Park (1993) Ltd.  
OS 189.3 Queenstown Adventure Park (1993) Ltd.  
OS 189.32 Queenstown Adventure Park (1993) Ltd.  
OS 109.5 Kiwi Vineyard Holdings Ltd.  
OS 138.30 Off Road Adventures Queenstown Ltd.

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**Commented [BG32]:** OS 71.5 Nathan Pringle.  
OS 72.5 Charlotte Pringle.  
OS 83.5 Michael McElroy.  
OS 87.5 Karen Ramsay.  
OS 92.5 Jana Brasch.  
OS 107.5 Edward and Anne Halson.  
OS 112.5 Claire Hazledine.  
OS 13.8 J Semple.  
OS 122.5 J Semple.  
OS 14.8 M Semple.  
OS 69.5 Andrew James Blackford.  
OS 131.5 Justine Lee.  
OS 150.5 Tracey van Hercul.  
OS 187.5 Joshua Nicholas Jones.  
OS 197.5 Sonja and John Kooy and Gavin.  
OS 202.5 Michael John Boyd.  
OS 204.5 Anna-Louise and Paul Hedley and Hollingsworth.

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### Landscape Capacity

The landscape capacity of the PA ONL Western Whakatipu Basin for a range of activities is set out below.

- i. **Commercial recreational activities** – ~~some~~ landscape capacity for small scale and low key activities that integrate with and complement/enhance existing recreation features; are located to optimise the screening and/or camouflaging benefit of natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; and enhance public access; and protect the area's ONL values.
- ii. **Visitor accommodation and tourism related activities** – ~~no~~ landscape capacity. very limited landscape capacity for visitor accommodation associated with existing dwellings, urban areas and consented platforms (including on the low lying southern margins of the PA adjacent Hansen Road and Fern Hill) and which are: located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be small scale and have a 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). **No** landscape capacity for visitor accommodation elsewhere in the PA. **No** landscape capacity for tourism related activities within the PA.
- iii. **Urban expansions** – **Very Low** ~~no~~ landscape capacity where urban development will read as infill at the lower slopes of the PA adjacent to and north of Fernhill.
- iv. **Intensive agriculture** – **no** landscape capacity.



- v. **Earthworks – very limited** landscape capacity for earthworks associated with farm, adventure tourism or public access tracks, that protect naturalness and expressiveness attributes and values, and are sympathetically designed to integrate with existing natural landform patterns.
- vi. **Farm buildings** – in those areas of the ONL with pastoral land uses, **very limited** landscape capacity for modestly scaled buildings that reinforce existing rural character.
- vii. **Mineral extraction – no** landscape capacity.
- i. **Transport infrastructure – limited** landscape capacity for trails that are: located to integrate with existing networks; designed to be of a sympathetic appearance and character; and integrate landscape restoration and enhancement; and protects the area's ONE values. **Very limited to n**~~No~~ landscape capacity for other transport infrastructure.
- Utilities and regionally significant infrastructure – limited** landscape capacity for infrastructure that is buried or located such that they are screened from external view. In the case of utilities such as overhead lines or cell phone towers which cannot be screened, these should be designed and located so that they are not visually prominent and/or co-located with existing infrastructure. In the case of the National Grid, limited landscape capacity in circumstances where there is a functional or operational need for its location and structures are designed and located to limit their visual prominence, including associated earthworks.
- viii. **Renewable energy generation – no** landscape capacity for commercial scale renewable energy generation. Very limited to no landscape capacity for discreetly located and small-scale renewable energy generation.
- ix. **Production ~~f~~Forestry – no** landscape capacity.
- x. **Rural living – Very limited to n**~~No~~ landscape capacity. Where such development is appropriate, it is likely to be: co located with existing development; sited to optimise the screening and/or filtering benefit of natural landscape elements; designed to be small scale and have a 'low-key' rural character; integrate landscape restoration and enhancement; and enhance public access (where appropriate).
- xi. **Passenger Lift Systems – limited** landscape capacity to improve public access to focal recreational areas higher in the mountains via non-vehicular transportation modes such as gondolas, provided they are positioned in a way that is sympathetic to the landform, are co-located with existing gondola infrastructure and designed to be recessive in the landscape.

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OS 138.2 Off Road Adventures Queenstown Limited.  
OS 189.2 Queenstown Adventure Park (1993) Ltd.  
OS 189.35 Queenstown Adventure Park (1993) Ltd.  
OS 138.8 Off Road Adventures Queenstown Ltd.

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**Commented [BG35]:** NB Roman numeral numbering error to be corrected in the final version of the Schedule.

**Commented [BG36]:** Consequential amendment arising from OS 74.2.

**Commented [BG37]:** OS 74.2. John May and Longview Environmental Trust.  
OS 91.3 Columb Family and Off Road Adventures Limited.

**Commented [BG38]:** OS 91.3 Columb Family and Off Road Adventures Limited.  
OS 189.2 Queenstown Adventure Park (1993) Ltd.  
OS 189.3 Queenstown Adventure Park (1993) Ltd.  
OS 189.39 Queenstown Adventure Park (1993) Ltd.  
OS 109.12 Kiwi Vineyard Holdings Ltd.

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**Commented [BG40]:** OS 109.12 Vineyard Holdings Ltd..  
OS 91.3 Columb Family and Off Road Adventures Limited.

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**Commented [BG42]:** OS 75.19 Peter Clark.  
OS 75.21 Peter Clark.  
OS 90.3 Will Hodgson.  
OS 142.2 Hansen Family Partnership.  
OS 142.44 Hansen Family Partnership.  
OS 186.7 Richard Kemp.  
OS 189.2 Queenstown Adventure Park (1993) Ltd.  
OS 189.3 Queenstown Adventure Park (1993) Ltd.  
OS 109.14 Kiwi Vineyard Holdings Ltd.  
OS 91.3 Columb Family and Off Road Adventures Limited.