BEFORE THE QUEENSTOWN-LAKES DISTRICT COUCIL

IN THE MATTER

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

ON BEHALF OF

MIDDLETON FAMILY TRUST (2332)

Submitter

EVIDENCE OF BENJAMIN ESPIE (LANDSCAPE ARCHITECT) 13th JUNE 2018





1. INTRODUCTION

- 1.1 My name is Benjamin Espie. I reside in Queenstown. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the Southern Branch of the New Zealand Institute of Landscape Architects and was the Chairman of that branch between 2007 and 2016. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004 I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council (QLDC).
- 1.2 The majority of my work involves advising clients regarding the protection of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development. The primary objective of these assessments and evidence is to ascertain the effects of proposed development in relation to landscape character and visual amenity.
- 1.3 Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in the rural areas of a number of districts. I have provided Environment Court evidence in relation to the landscape categorisation of the Wakatipu Basin, in relation to the formulation of the landscape related provisions that are now part of the Operative District Plan (ODP), and in relation to many resource consent applications and a number of plan changes within the Wakatipu Basin.
- 1.4 I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note of November 2014 and agree to comply with it. This evidence is within my area of expertise, except where I state that I am relying on information I have been given by another



- person. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.
- 1.5 In preparing this evidence I have reviewed the relevant submission, further submissions and a statement of evidence prepared by Bridget Gilbert dated 28th May 2018 (Ms Gilbert's evidence).

2. SCOPE OF EVIDENCE

- 2.1 The purpose of this evidence is to assist the Hearings Panel on matters within my expertise of landscape architecture and landscape planning in relation to Submission 2332 on the Proposed District Plan (PDP). In relation to this submission, I have been asked by the submitter to prepare evidence regarding the landscape and visual effects of the requested relief in relation to the zoning that is sought in the Tucker Beach / Queenstown Hill Station area. I have not examined the more general aspects of the submission that relate to the Wakatipu Basin as a whole.
- 2.2 Submission 2332 attracted three further submissions. Two of the further submissions are identical (Muspratt 2714 and Tucker Beach Residents 2802) and state very general opposition to the relief sought. The third further submission (Oasis in the Basin Association 2713) seeks that all development is kept off the identified ONL and the consideration of a walkway link to between the Lake Johnson area and the Tucker Beach Recreation Reserve. I will not discuss these submissions specifically but will address the landscape and visual effects of the requested relief in relation to nearby residents and occupants.

3. EXECUTIVE SUMMARY

- 3.1 In relation to Schedule 24.8 of the PDP (which is derived from the WBLUPS), I consider that the western end of LCU4 has more capability to absorb additional development than is stated in the notified version of the PDP.
- 3.2 The relief that is sought has been amended since the time of the submission. I consider that development enabled by the amended relief has considerable logic in relation to landscape character and visual amenity issues. I consider that it can appropriately be absorbed without broad-scale landscape character effects and with only particularly localised visual effects.



4. AMENDED RELIEF

- 4.1 The relief sought in relation to the zoning in the Tucker Beach / Queenstown Hill Station area has been amended since the time of Submission 2332. The details of the amended relief are set out in Mr Geddes evidence. I attach a plan showing the requested zoning to this evidence as Appendix 1.
- The notified PDP (Wakatipu Basin Variation) zones a small eastern part the Middleton land as Wakatipu Basin Lifestyle Precinct (WBLP) and the rest of the landholding within the identified Wakatipu Basin (i.e. the land outside the identified ONL) as Wakatipu Basin Rural Amenity Zone (WBRAZ). I summarise the amended relief as follows1:
 - A small area of WBLP will sit at the eastern end of the landholding. This area is as per the notified Variation.
 - Two large flat terrace areas will be zoned as Tucker Beach Residential Precinct (TBRP) that will enable suburban development down to a minimum lot size of 600m².
 - In the north-western part of the landholding, some terraced land will be zoned as WBLP.
 - A primary access road corridor is identified through the landholding and it is envisaged that this will be vested.
 - The steep and more visually exposed parts of the area proposed to be rezoned will be identified as Escarpment Protection Area (EPA – effectively a no-build, open space area).
- 4.2 I shall refer to the relief that is now sought as the **requested situation**. I shall refer to all of the area proposed to be rezoned as **the site**. Mr Geddes provides a set of plan provisions in relation to the requested situation. In relation to landscape and visual issues, provisions (additional to the notified WBLP provisions) that I consider the be of particular relevance are:
 - Objective 24.2.7 and associated Policies that relate to the TBRP.

¹ As set out in Mr Geddes evidence, it is sought that the site is zoned WBLP and TBRP, however an alternative relief is sought in which part of the site is zoned LDRZ. Whether the alternative or primary relief is confirmed, the actual outcomes will be the same. Therefore, for conciseness, I refer to the WBLP and TBRP relief only.



- Rule 24.4.30: buildings and residential activities within the TBRP are controlled activities.
- Rule 24.4.32: buildings within the EPA are non-complying activities.
- Rule 24.4.33: the EPA must be managed to meet a number of criteria including 15% native planting coverage.
- Standard 24.5.17: building coverage in the TBRP is restricted to 40%.
- Standard 24.5.19: building height is restricted to 6 metres.
- Rule 27.5.1: minimum lot size in the TBRP is 600m².
- Standard 27.7.13.1: No subdivision shall occur until the EPA has been managed and planted in accordance with certain criteria.

5. LANDSCAPE CHARACTER

EXISTING LANDSCAPE CHARACTER

- Landscape character has been defined as the "distinct and recognisable pattern of elements in the landscape that make one landscape different from another, rather than better or worse".

 The elements that give any landscape its character are derived both from nature (geomorphology, ecology, hydrology) and from human interaction (roads, buildings, human land uses, elements that have historical or cultural significance).
- In late 2016 / early 2017, the QLDC commissioned and received the Wakatipu Basin Land Use Planning Study (WBLUPS) that was intended to give guidance regarding a suitable zoning regime for the Wakatipu Basin based on a study of the landscape character and visual amenity of the basin. The WBLUPS identifies 25 Landscape Character Units within the basin. Unit 4 Tucker Beach takes in all the non-ONL land between the Quail Rise Zone in the east round to the western end of the site that is subject to this submission, including ODP areas of Rural Residential and Lifestyle Zone. I attach to this evidence as Appendices 2 and 3, the relevant map and description table from the WBLUPS. I consider that particularly relevant parts of the WBLUPS' description of this landscape unit are:

² Landscape Institute and Institute of Environmental Management and Assessment *Guidelines for Landscape and Visual Impact Assessment* (3rd ed, Routledge, Oxford, 2013), page 157.



Predominantly exotic vegetation and scrub throughout the steep river cliffs (outside of the LCU) and hill slopes. Exotic amenity plantings around dwellings. Scattered shade trees and scrub in places, with mown grass and grazed areas evident.

Rural residential with some working rural uses evident throughout the land at the western end of the unit. A substantial portion of the undeveloped land at the western end of the unit is in DoC ownership.

Generally, dwellings and platforms positioned to enjoy highly attractive views of Shotover River and the ONL mountain backdrop. Numerous consented but unbuilt platforms (20).

The containment of the hill slopes to the south means that visibility is limited to the Shotover corridor, the river terraces to the south, and the upper reaches of Fitzpatrick Basin / Dalefield. The lower lying central and northern portions of the unit are not prominent within the wider basin landscape. The elevated hill slopes along the south edge of the unit are locally prominent.

A varying sense of openness within the unit as a consequence of vegetation patterns. Overall, the large-scale landforms framing the local area (particularly to the south) contribute a sense of containment.

A relatively low level of coherence as a consequence of varying landform and vegetation patterns.

A moderate sense of naturalness throughout the western end of the unit as a consequence of the limited level of built development, its proximity to the Shotover and its position adjacent an undeveloped ONL area. The central and eastern end of the unit is considerably more developed and therefore has a lower perception of naturalness. Reinforced by the close proximity of Quail Rise.

Relatively open, exposed and undeveloped nature of the western portion of the unit, within an extremely high value landscape context dominated by ONLs and including a substantial DoC Reserve, makes it highly sensitive to landscape change. Absence of defensible boundaries to existing rural residential and urban zones in the vicinity, make the central and eastern portions of the unit in particular, vulnerable to development creep. Visibility of the development throughout the elevated slopes along the southern edge of the unit.

Close proximity to Queenstown. Relatively contained nature of location. Riparian restoration potential. Potential for integration of walkways / cycleways etc. associated with riverscape. Integration of defensible edges with additional subdivision. Integrating effect of existing development context throughout eastern end of the unit in particular. Easy topography along central and northern portion of the unit. Close proximity of urban infrastructure.

- 5.3 Ultimately, the WBLUPS finds that the capability of Unit 4 to absorb additional development is low at the western end of the unit and moderate-high throughout the rest of the unit. The landscape character unit description table of the WBLUPS is incorporated into the PDP as Section 24.8.
- 5.4 Submission 338 on Stage 1 of the PDP requested development zoning over the site as well as additional land to the southeast of the site. Dr M Read provided landscape evidence on behalf of the QLDC in relation to Submission 338. In part, she agreed with the findings of the WBLUPS but found that the northern part of the site (approximately the northern third of the entire area of



proposed development zoning as shown on Appendix 1) could appropriately accommodate RRZ³.

- In relation to existing landscape character, I disagree with some aspects of the WBLUPS' findings regarding Unit 4 (i.e. parts of PDP Section 24.8). Below, I set out the parts of the findings that I disagree with in italics and give my comments in relation to each point of disagreement.
 - i. The lower lying central and northern portions of the unit are not prominent within the wider basin landscape.
 - I agree with this point but consider that the terraces at the western end of the unit are also not prominent within the wider basin. There are some limited views available from brief parts of Littles Road and Domain Road but this cannot be described as prominence and only relates to a very small part of the wider basin. In relation to the majority of the basin, the site represents a particularly hidden corner.
 - ii. Generally, the unit reads as a part of the Shotover River margins with a clearly legible patterning of decreasing development as one moves westwards away from Quail Rise.
 - I disagree with this point. Appendix 2 to this evidence shows existing development within Unit 4. Consented building platforms and existing dwellings are shown (although a number of existing dwellings within the RRZ to the immediate east of the site are not shown). There are a number of unbuilt lots within the ODP's Ferry Hill Rural Residential Subzone and the RRZ to the immediate east of the site that provide for dwellings (no consented building platform is required within the ODP RRZ). If we consider this in relation to development patterns, there is a relatively even spread of development between the Quail Rise Zone and the site. If anything, it becomes denser as one approaches the site, given the presence of the ODP RRZ (and the PDP WBLP). There is then currently an abrupt end point at the site's eastern boundary.
 - iii. Relatively open, exposed and undeveloped nature of the western portion of the unit, within an extremely high value landscape context dominated by ONLs and including a substantial DoC Reserve, makes it highly sensitive to landscape change.

I agree that the site is relatively open and undeveloped. I do not agree that it is exposed; as discussed above, it is well hidden in relation to the basin in general. I accept that the ONL landscape that surrounds the western part of the landscape unit is of high value. I consider it

 $^{^{\}rm 3}$ Rebuttal evidence of Dr M Read, dated 7 July 2017, paragraphs 5.22 and 5.23.



is an exaggeration to describe the western end of the unit as highly sensitive to change. In terms of character, although paddock-dominated, the western end of the unit is not part of any broad, cohesive pastoral landscape. It is a pocket of pasture land left between development zoning and the clearly legible ONL boundary. In terms of visibility, it is relatively hidden. I consider it is less sensitive than the steeper land that has already been zoned as RRZ and Ferry Hill Rural Residential Subzone to the east, pursuant to the ODP (and WBLP pursuant to the PDP).

iv. Easy topography along central and northern portion of the unit.

With reference to Appendix 2, the part of Unit 4 that forms the northernmost roadside flats of the Ferry Hill Rural Residential Subzone, and also the land immediately across Tucker Beach Road, is of easy topography. Apart from that, the remainder of the unit is steep or rolling. I consider that the terraces of the western part of the unit are the easiest topography of the unit.

v. Sense of (relative) remoteness and connection with the riverscape and surrounding mountains at the western end of the unit.

I agree that the closely surrounding ONL mountain slopes and the Shotover river corridor bring a wildness and naturalness to the experience of being in this landscape unit. I consider that this can be retained while providing for appropriate development within the unit. It is the character of the landscape that immediately surrounds the unit that brings these qualities to the experience, rather than the character of the unit itself.

- In broad terms, the real landscape character difference between the eastern part of Unit 4 and the western part is that the eastern part has had development zoning placed over it in the past and consequently developed, while the western part has not. With reference to the Appendix 2 map, it is clear that the western edge of the development zoning (i.e. the ODP RRZ) has been drawn in relation to cadastral land ownership patterns, rather than in relation to any landform or landscape patterns. From a landscape planning perspective, I see no reason why the western edge of the zoning has been drawn in its ODP location (or its PDP location in relation to the WBLP).
- 5.7 For all of the reasons above, I do not consider that western end of Unit 4 is significantly more sensitive than the eastern part. As will be discussed in relation to visual effects subsequently, this western part of the unit is not visually prominent within the Wakatipu Basin. Additionally, it



immediately adjoins development zoning, it is of flat terraced landform, its is contained and separated from the broad pastoral landscape of the broader Wakatipu Basin floor. For these reasons, in a general sense, I find that it can potentially absorb development that logically ties into existing patterns, that is relatively hidden and that does not sully the pastoral character of the Wakatipu Basin floor as a whole.

EFFECTS ON LANDSCAPE CHARACTER

- 5.8 When describing effects, I will use the following hierarchy of adjectives:
 - Negligible;
 - Very Low;
 - Low;
 - Moderate;
 - High;
 - Very High;
 - Extreme⁴.
- 5.9 Notwithstanding the general absorption capacity of the western end of the WLUPS' Unit 4, the specific relief sought will have some effects on existing landscape character. Subdivision design would be scrutinised via a resource consent process and details would be formulated at that time, however, plan provisions that form part of the requested relief set down the parameters of the future finished picture. With reference to the Appendix 1 plan, if the requested situation is confirmed (along with the notified WBLP):
 - the density of rural living activity along Tucker Beach Road to the east of the site will increase slightly as the WBLP fills out;
 - the flat terrace parts of the site will develop as a relatively small node of suburban development, with lot sizes akin to Lake Hayes Estate or Shotover Country. A typical suburban pattern with develop within these specific areas but with strong street tree planting;
 - The northern periphery of the development area will take the form of a larger lot edge; a small
 pocket of rural living density that addresses the river corridor;

⁴ New Zealand Institute of Landscape Architects Education Foundation; 2010; Best Practice Note 10.1 'Landscape Assessment and Sustainable Management', page 8.



- The escarpments that separate the developed terraces will remain as open space. The many
 existing mature amenity trees will remain (with reference to Appendix 6), bringing some
 maturity and character and reducing starkness;
- The ONL mountain slopes that contain the sought zoning area will remain in their current state, giving a strong edge and contrast in relation to the proposed development area and the notified WBLP. The river corridor will remain a close, wild and natural element. Pedestrian and cycle trail connections are likely to improve, with easy access to the riverside DOC reserve land and to Frankton via Lake Johnson (it is roughly 3km from the site to the Events Centre and 3.5km to the 5 Mile shopping centre via trail connections);
- Overall, the site would become a treed, contained instance of suburban development that forms something of a book-end to the rural living activity that currently extends along Tucker Beach Road.
- 5.10 The landscape character of the site itself will change substantially, from paddock-dominated farmland to largely suburban development. The prominent and legible escarpments will weave through the suburban pattern as open space. The character of the broader vicinity will change in that development will extent further along Tucker Beach Road than currently and there will be a denser node at the very end of Tucker Beach Road. The existing small, contained area of pastoral land use at the end of Tucker Beach Road will change to a residential-dominated area such that the ONL mountain slopes and river corridor closely surround all residential and rural living land use. The character of the western end of Tucker Beach Road will become less peaceful, rural and bucolic and more occupied and busy. However, the closely surrounding ONL land will remain a dominating element.
- 5.11 I consider that the overall pattern of land uses (i.e. the layout of unoccupied land, rural living land and residential land) would have considerable logic if the requested relief proceeds. The proposed pattern would very much build on the existing pattern of development and land uses. The edges of the developed/occupied area would be strongly grounded in landform and landscape patterns. The ONL would remain unchanged and dominant.
- 5.12 Importantly, as discussed, the location of the site is such that it is contained and separated from the broad-scale pastoral valley floor landscape that covers the floor of the Wakatipu Basin in



general. Therefore, the character change that the requested relief will bring will not be influential over a broad area. It will not affect the Wakatipu Basin as a whole.

5.13 Overall, I consider that the requested relief will have landscape character effects in that naturalness and rural character will be reduced, but at a particularly localised scale only and in a way that ties in with its context. In this regard, the site is different to the majority of the Wakatipu Basin. I consider that outside of this particularly localised vicinity, there will be negligible effects on landscape character. In relation to the Wakatipu Basin as a whole, I therefore consider that this site is particularly suitable for development zoning.

6. VIEWS AND VISUAL AMENITY

- Observers that have the potential to have their views or visual amenity affected by the relief sought by the submission can be categorised as follows:
 - Observers to the north of the site (Littles and Fitzpatrick Road area);
 - Distant observers to the northeast of the site (Domain Road area);
 - Users of the Shotover River corridor and associated public spaces;
 - Occupants of the western end of Tucker Beach Road.
- 6.2 I will discuss each of these groups in turn, examining existing views and visual amenity and the effects of the relief sought.

OBSERVERS TO THE NORTH OF THE SITE

6.3 The terraces of the site face north addressing the Shotover River corridor. To the north of the Shotover is the rolling topographic area of Fitzpatrick Road and Littles Road, which accommodates rural living land use. Some of these rural living lots are accessed off Fitzpatrick Road and some are accessed off Littles Road or Moorhill Road. Some of these rural living lots gain a line-of-sight in a southerly direction towards the site. There are also some views available from an approximately 450-metre-long stretch of Littles Road as set out on Appendix 4. The Littles Road views are illustrated by Photograph 1 of Appendix 5. Views from private land are similar. The view from the illustrated part of Littles Road is at a distance of approximately 1.2



kilometres. The views from the closest rural living properties (i.e. those at the very end of Moorhill Road) are at distances of approximately 500 metres.

- Photograph 1) is a broad view across a mid ground of rolling topography to the dominant forms of the Remarkables and Ferry Hill. The foreground is the Littles Stream area that accommodates a number of rural living building platforms, most of which are currently unbuilt. The mid-ground (i.e. the rolling topography that sits in front of Ferry Hill and the Lake Johnston area) includes the subject site and the partially built ODP RRZ that sleeves Tucker Beach Road (which the PDP zones as WBLP). Rural living activity, including built form, is evident in this mid-ground and this would become more visually significant as the area of RRZ/WBLP is developed. The requested relief would add more built form to this scene as is illustrated on Photograph 1.
- A user of Littles Road is travelling through rolling countryside. The relevant 450 metre stretch of road is particularly winding. Elements that sit in the mid-ground at distances of a kilometre and more are relatively difficult to notice. Given the brevity of visibility, I consider that users of Littles Road will find the changes brought by the requested relief relatively difficult to discern. Views in the direction of the site from this stretch of road may have a slightly more occupied character but not in any way that significantly discords with the composition of current views. I consider that the visual amenity of a Littles Road user will be affected to a very low degree.
- Observers on private land to the south of Littles Road and Fitzpatrick Road gain views that are similar to those from Littles Road but are at shorter distances. The views from most of these rural living properties are oriented to the north and east but the more southerly properties gain views across the Shotover to the Tucker Beach area and also down the Shotover River corridor to the east. These properties gain views that include the ODP rural living zones of the Tucker Beach Road area and the subject site. The views are of a similar orientation to that of Photograph 1 but are at closer distances, in some cases as close as 500 metres.
- The requested relief would provide for built development that will be visible in these views. With reference to Photograph 1, factors that mitigate potential visual effects are:
 - The lower terrace area to accommodate TBRP is lower in altitude than a viewer, hence it is often hidden;



- The upper terrace to accommodate TBRP is viewed horizontally in these views.
 Therefore, only its northern edge is visible.
- The most north-western part of the site that is proposed to be WBLP is the most exposed but is also provides for the lowest density.
- The most visually prominent parts of the site will be protected in an open space form as EPAs.
- Many mature specimen trees are to be retained and protected by requested relief. In the horizontal views that are gained, these trees will assist in visually softening development and integrating it into the existing scene⁵.
- Proposed policies require strong street tree planting through the TBRP. Again, given the horizontal nature of views this will provide visual softening of built development.
- The WBRLP provides for buildings as a restricted discretionary activity with discretion including all aspects of building design including landscaping. The many assessment matters and the description of existing landscaper character (subject to my earlier comments) will mean that development in the WBRLP will need to be well designed and landscaped. I consider that this will mean built form in the northern WBRLP parts of the subject site will be of a visually recessive appearance, will be well vegetated and will be integrated into existing vegetative patterns formed by the retained and protected trees.
- 6.8 Given the above, I consider that development enabled by the requested relief will appear as a continuation or expansion of the existing RRZ (or WBRLP pursuant to the PDP). It will affect views of occupiers of the southern Moorhill/Fitzpatrick Road area but not in a way that fundamentally discords with the existing composition of views. I consider that adverse visual effects will be of a low degree.
- No landowners on the north side of the Shotover have lodged a further submission in relation to the requested relief.

⁵ The evidence of Mr Geddes sets out the provisions that relate to tree protection. I attach to this evidence as Appendix 6 a schedule of the existing specimen trees that the landowner envisages protecting. I understand that a schedule of this sort (or perhaps this particular schedule) would form part of a future subdivision resource consent application if the requested situation proceeds.



DISTANT OBSERVERS TO THE NORTHEAST OF THE SITE

- area) from an approximately 650-metre-long stretch of Domain Road at distances of approximately 3 kilometres. These views are illustrated by Photograph 2 of Appendix 5. A viewer on this stretch of Domain Road is approximately 30 metres lower in elevation than the surface of the upper terrace area, hence only the eastern edge of the terrace is visible. In the left midground of these views the ODP's RRZ is visible and further to the left the Ferry Hill Rural Residential Sub Zone, RLZ and associated development are visible. These rural living areas are proposed to become part of the PDP's WBLP. Their built development appears as a strip across the lower slopes of Ferry Hill. A small number of private properties on the western side of Domain Road (none of which appear to accommodate dwellings) gain similar views to the road itself.
- 6.11 The Domain Road area gains dramatic views to the north towards Coronet Peak and the south towards the Remarkables. Most dwellings are oriented to the north. The view in the direction of the site is very much a side view or a peripheral view. Given the horizontal nature of these views, foreground vegetation often obscures the site's upper terrace area. The escarpment that leads up to the upper terrace will remain in its current open state.
- Given that the direction of view to the site is peripheral for a Domain Road user and that distances are approximately 3 kilometres, I consider that the majority of travellers on Domain Road would find it difficult to notice development on the site as provided for by the requested relief. The relief includes controlled activity status for buildings within the TBRP, with control including external appearance, colours and landscaping. I consider that these controls can be used to ensure that the horizontal strip of development that will ultimately emerge in these views will be visually recessive, particularly given its distance from the viewer and the presence of other development zoning close to the site. I consider that development enabled by the requested relief will be a small and inconspicuous element in these views and will be subordinate to the more dominant elements, being the mountain backdrop. Overall, I consider that effects on visual amenity as experienced from the Domain Road area will be of a low degree at most.
- 6.13 No landowners in the Domain Road area have lodged a further submission in relation to the requested relief.



USERS OF THE SHOTOVER RIVER CORRIDOR AND ASSOCIATED PUBLIC SPACES

- 6.14 Shotover Jet Limited operate commercial jet boat trips on a stretch of the Shotover River that runs to the west of the site, as shown on Appendix 4. The part of the Shotover that runs to the east of this may be used by recreationalists but I understand that the river itself is not frequently used. The river banks on the true left (north) side of the river are difficult to access and are again infrequently used. With reference to Appendix 4, the true right bank close to the subject site (where Viewpoint 3 is located) takes the form of the DOC administered Tucker Beach Recreation Reserve.
- 6.15 The Tucker Beach Recreation Reserve is a large flat river floodplain area generally covered in rank grass and self-seeded willows. A number of informal vehicle and foot tracks cross the reserve. The reserve is generally minimally maintained but it contains an 18-hole disc golf course. I understand that the reserve is relatively well used for informal recreation, particularly by nearby residents.
- 6.16 From approximately the northern half of the Tucker Beach Recreation Reserve views are available in a southerly direction to the northern edges of the proposed areas of TBRP and WBRLP. These views are illustrated by Photograph 3 of Appendix 5 and are at distances of between 200 and 800 metres. From these viewpoints the ODP's RRZ and Ferry Hill Rural Residential Sub Zone (WBLP pursuant to the PDP) are plainly visible to the left of the site as a band of rural living development covering the lower slopes of Ferry Hill.
- 6.17 If development occurs as per the requested relief, it will be visually apparent to an observer in the relevant part of the Tucker Beach Recreation Reserve that the site accommodates residential land use. The primary access road will be plainly visible at the southern edge of the reserve, with some street tree or other vegetated treatment. A scattering of buildings and living activity will be evident in the proposed WBLP in the north-western part of the site, albeit that buildings will be visually softened and partially screened by existing and proposed vegetation. Parts of the northern edges of the TBRZ will also be visible, again through vegetation.
- 6.18 In relation to the visual amenity of a reserve user, the visibility of development that is described above will appear as an extension to the west of the current RRZ. The RRZ is more visually displayed since it occupies north-facing sloping land. It will be evident to an observer that the amphitheatre-like landform that surrounds the Tucker Beach Recreation Reserve is occupied by



residential land use of varying densities. Notwithstanding that, built development within the site itself will not be prominently displayed due to the flat terrace landforms and the existing and future vegetation.

An observer within the Tucker Beach Recreation Reserve currently experiences an informal open space form of amenity. The experience is dominated by the immediately adjacent, spectacular and fast-moving Shotover River. To the south Ferry Hill rises, with its lower slopes accommodating plainly visible rural living land use. The slopes of K No 2 and Sugar Loaf also rise and the Queenstown Hill Station farm base activities can be seen here. The requested relief would extend residential occupation further round to the west such that a reserve use will feel more surrounded by human occupation. The reserve itself will remain open and somewhat separate from the living activity that exists on the slopes. No key views from the reserve will be particularly altered. The visual amenity that an observer experiences will continue to be that of an informal open space with the Shotover to the immediate north. There will be some more evidence of human occupation but this will be in a configuration that extends an existing pattern, rather than being the introduction of some entirely new or different landscape element. Overall, I consider that an observer's views and visual amenity will be affected to a low degree only.

OCCUPANTS OF THE WESTERN END OF TUCKER BEACH ROAD

- to change the existing rural living zones to WBLP. When travelling on Tucker Beach Road from the Quail Rise Zone round towards the site, a rural living character is apparent on both sides of the road. When a traveller passes Hansen Road vegetation encloses views but at a point adjacent to 331 Tucker Beach Road (i.e. Viewpoint Location 4 shown on Appendix 4) views to the west open up that include the amphitheatre-like topography that faces north to the Tucker Beach Recreation Reserve and that includes the subject site. This view is illustrated by Photograph 4 of Appendix 5. From this point westwards intermittent views to the site are available.
- 6.21 The west-facing and north-facing rural living properties that sit above and below Hansen Road and that extend to the west from Hansen Road gain views that include the site. These views are illustrated by Photographs 5 and 6 of Appendix 6. With reference to Appendix 4, the properties that immediately line Hansen Road have a more northwest facing outlook that more squarely



include the site (as per Photographs 5 and 6). The properties west of this are more north-facing and in views from these properties, the site is more peripheral. All of these properties have north facing views that take in Coronet Peak but also gain views up the Shotover River corridor towards Arthur's Point.

- In relation to the rural living properties described (i.e. the line above Hansen Road and all that lie to the west of those), development enabled by the requested relief will be visible in the views that I have described at distances of between 1.2 kilometres and 700 metres. Views are roughly horizontal (as illustrated by Photographs 5 and 6), therefore the eastern edges of the proposed development areas will be the parts that are visible. Street trees and protected amenity trees (pursuant to Appendix 6) will visually soften built form. With reference to Photographs 5 and 6, the lower terrace TBRP will be generally well screened. The proposed WBRLP at the northwestern edge of the site will be visible as a small scattering of built form but will be considerably softened by exiting protected trees and additional vegetation. The western edge of the upper terrace TBRP will be exposed as a horizontal strip of built form. It will sit on the line of a currently obvious landform change and will leave the ONL mountain slopes in their current state.
- As discussed, proposed provisions will provide QLDC control of external appearance, colours and landscaping. This will provide some visual softening. Overall, the currently unoccupied, farmed terrace area that forms a left-hand midground element will accommodate visual evidence of residential land use. While not visually prominent, it will be clear to a viewer that the terrace areas of the site support residential land use. The scene will appear more occupied and less rural. The new human occupation will appear as a somewhat distant extension of the rural living activity that already exists at this end of Tucker Beach Road.
- With reference to Photographs 5 and 6, I consider that the overall effect on views from the properties described will be that the non-ONL midground becomes more modified and occupied but in a way that accords with landform and existing development patterns and is relatively non-prominent. The views that are had will continue to be dominated by mountain slopes, rugged skylines and the Shotover River corridor. In relation to the properties described, I consider that effects on visual amenity will range from a low degree of effect (for more distant viewing properties such as those immediately above the Hansen / Tucker Beach Road intersection) to a moderate degree of effect (for closer viewing properties at the western end of the ODP RRZ).



SUMMARY REGARDING VISUAL EFFECTS

- 6.25 The site sits in a relatively hidden corner of the Wakatipu Basin. It is separate from the broad non-ONL landscape of the floor of the Wakatipu Basin.
- 6.26 Notwithstanding the above, some visibility of the site from surrounding areas. Nearby areas north of the Shotover, east of the site (in the Hansen Road / Tucker Beach Road area) and in the Tucker Beach Recreation Reserve gain views that will be affected. Effects on visual amenity as experienced from these areas will generally be of a low degree but will range up to a moderate degree for viewers in the western end of the ODP RRZ.

7. MS GILBERT'S EVIDENCE

- 7.1 Ms Gilbert discusses Submission 2332 in Section 14 of her evidence. As mentioned previously, the relief sought has been amended since the time of the submission.
- 7.2 Figure 10 of Ms Gilbert's evidence and some of her text appears to indicate that the area of notified WBLP that lies to the east of the Middleton landholding is part of the site or is subject to the submission. This is not the case. The submission and the relief sought only relate to land within the WBRAZ, i.e. land outside of the identified ONL and the notified WBLP.
- 7.3 Paragraph 14.4 of Ms Gilbert's evidence mentions that WBLP is proposed on the river flats adjacent to the Shotover. In the amended relief this is not the case. The proposed WBLP within the site sits on a series of terraces separated by escarpments that are to be EPA. Even the northernmost terrace area (the one closest to the river) is elevated above the river flats and separated from the by an escarpment on which mature trees are to be protected. I consider that the northern edge of the zoned area sought by the amended relief will be logical and appropriate. An attractively vegetated escarpment will create the southern edge to the reserve area, and residential activity will sit above this, suitably separate from the reserve flats.
- 7.4 At paragraph 14.5, Ms Gilbert describes the site as three topographic areas. Her Area (b) is the lower terrace area on which TBRP is sought. Ms Gilbert's description implies that this terrace area is part of the river flats that also take in the Tucker Beach Recreation Reserve. Her



paragraph 14.8 reinforces this and implies that this area is perceived as part of the Shotover River Margin. It is important to note that this is not the case. This lower terrace area is flat pasture but is elevated above the river flats of the recreation reserve by some 5 to 7 metres and is at least 260 metres from the river itself. It is entirely separate from the margin and floodplain of the Shotover. Again, the northern edge of this lower terrace area of proposed TBRP takes the form of an escarpment that supports many attractive trees that are to be protected. The EPA provisions require additional vegetation as well. Again, I consider that this northern escarpment creates a suitable edge between the reserve and the area proposed to be zoned and will also create an attractive entry experience to the future residential area.

- 7.5 In her paragraph 14.7, Ms Gilbert notes that the area on which zoning is sought is of more limited visibility. I discuss visibility elsewhere and find that it is limited. The amendments to the relief sought mean that visibility is less than that of the original relief which Ms Gilbert assessed. Ms Gilbert goes on to suggest that the adjacency of the site to the identified ONL mean that it is particularly sensitive to change.
- As discussed elsewhere, I certainly consider that the site has some sensitivity to change and the design of zoning needs to be done carefully (as I consider it has), but I do not agree with the principle that adjacency to an ONL necessarily makes a site particularly sensitive. In some particular cases, some sort of a buffer or setback along the edge of an ONL or ONF may be appropriate if non-ONL land acts as an important open foreground in broad views of an ONL but in many cases more developed land can (and does) appropriately sit immediately adjacent to an ONL. Some examples within the Wakatipu Basin are:
 - The residential activity areas of the Quail Rise Zone that immediately abut the open ONL/F slopes of Slope Hill on its south-eastern side. A firm line creates a contrast between a suburban land pattern and an open roche moutonee.
 - The suburban and town centre area of Arrowtown which immediately abut the Arrow River and ONL slopes of Tobin's escarpment and German Hill. The township pattern of land use sits on flat terrace land that meets the ONL slopes at a hard line.
 - The upper urban and suburban areas of Queenstown and Frankton Road where densely
 developed land meets the open slopes of Queenstown Hill at a hard line. Again, the
 contrast highlights the landscape character of both the developed and undeveloped land.



- The suburban areas of Fernhill where relatively dense residential activity meets the steep
 ONL slopes of Ben Lomond at a clear line of delineation.
- 7.7 There are many other examples throughout the district. In some of these examples, the developed land is land that would be part of the ONL if it had not been developed. This is not the case in relation to the subject site. The relief sought places development zoning on land that is agreed to be outside of the identified ONL. It is on landform that is separate and distinct from the ONL land. In a landscape planning sense, this sort of result is the most successful; where changes in land use conform with changes in land form; where lines that are used as the edges of differing zonings are natural lines derived from landform and landscape. Examples of this are:
 - The Atley Road / Mathias Terrace area of Arthur's Point where residential zoning sits
 on flat terrace land with ONL Rural Zone land surroundings it that takes the form of a
 steep escarpment. The zoning edge follows the landform line that marks the lip of the
 terrace.
 - The Township Zone of Luggate that occupies flat terrace land that abuts steeper slopes
 of the Pisa Range with are ONL Rural Zone. The zone boundary coincides with the
 landform change from flats to mountain slopes;
 - The Township Zone of Glenorchy where township zoning and development covers flat alluvial land that meets the Rural Zoned ONL slopes of The Fort at the clear toe of a slope.
- 7.8 Consequently, I do not agree that land that immediately adjoins an ONL is necessarily sensitive nor should be excluded from development simply because it is beside an ONL. In this case, the land on which development zoning is sought is of very different landform to the ONL and a clear, appropriate demarcation and contrast can exist.
- 7.9 In her paragraph 14.11, Ms Gilbert suggests that the proposed relief would mean that the TBRP and Quail Rise would sit as urban (or suburban) areas, with an "island" of rural living development sitting between them; being the 2.5-kilometre sleeve of WBLP that flows Tucker Beach Road. She finds that this would be a fragmented result that is inappropriate. I disagree because:



- The 2.5-kilometre sleeve of WBLP will be an area of zoning of 76 hectares. This is a large area of zoning, considerably larger than other areas of WBLP that have been notified, such as (for example) the Alec Robbins Road WBLP (22 hectares) and the Arrow Junction WBLP (59 hectares). Consequently, this area cannot be described as a fragment; it is a large area that can sit as a legitimate area of zoning in its own right.
- The zoning pattern that would result from the relief sought would be one in which
 residential density (Quail Rise and the TBRP) would sit on flat terrace land, while the
 inclined lower slopes of Ferry Hill (which are less distinct from the ONL) accommodate
 a rural living density. I consider this to be a logical pattern that responds to landscape
 considerations.
- 7.10 For the reasons given above and throughout this evidence, I disagree with Ms Gilbert's conclusions that the relief sought is inappropriate.

8. CONCLUSIONS

- In relation to existing landscape character, I disagree with parts of the LCU4 section of Schedule 24.8 of the PDP (which is derived from the WBLUPS). I do not consider that the western end of Unit 4 is has significantly less capability to absorb additional development when compared to the eastern part of the unit. My reasons primarily are that:
 - The western end of the unit is not more prominent or displayed than the eastern part, in fact, it is often more hidden.
 - The existing pattern of development does not feather out as one approaches the western
 end of the unit, it is continuous and uniform. The ODP RRZ (and the PDP WBLP) end
 abruptly and inappropriately at the eastern boundary of the site.
 - Adjacency to ONL land does not necessarily make a site sensitive. Developed land can
 (and does) often sit immediately adjacent to ONL land in any entirely appropriate way.
 There are many examples of this throughout the district.



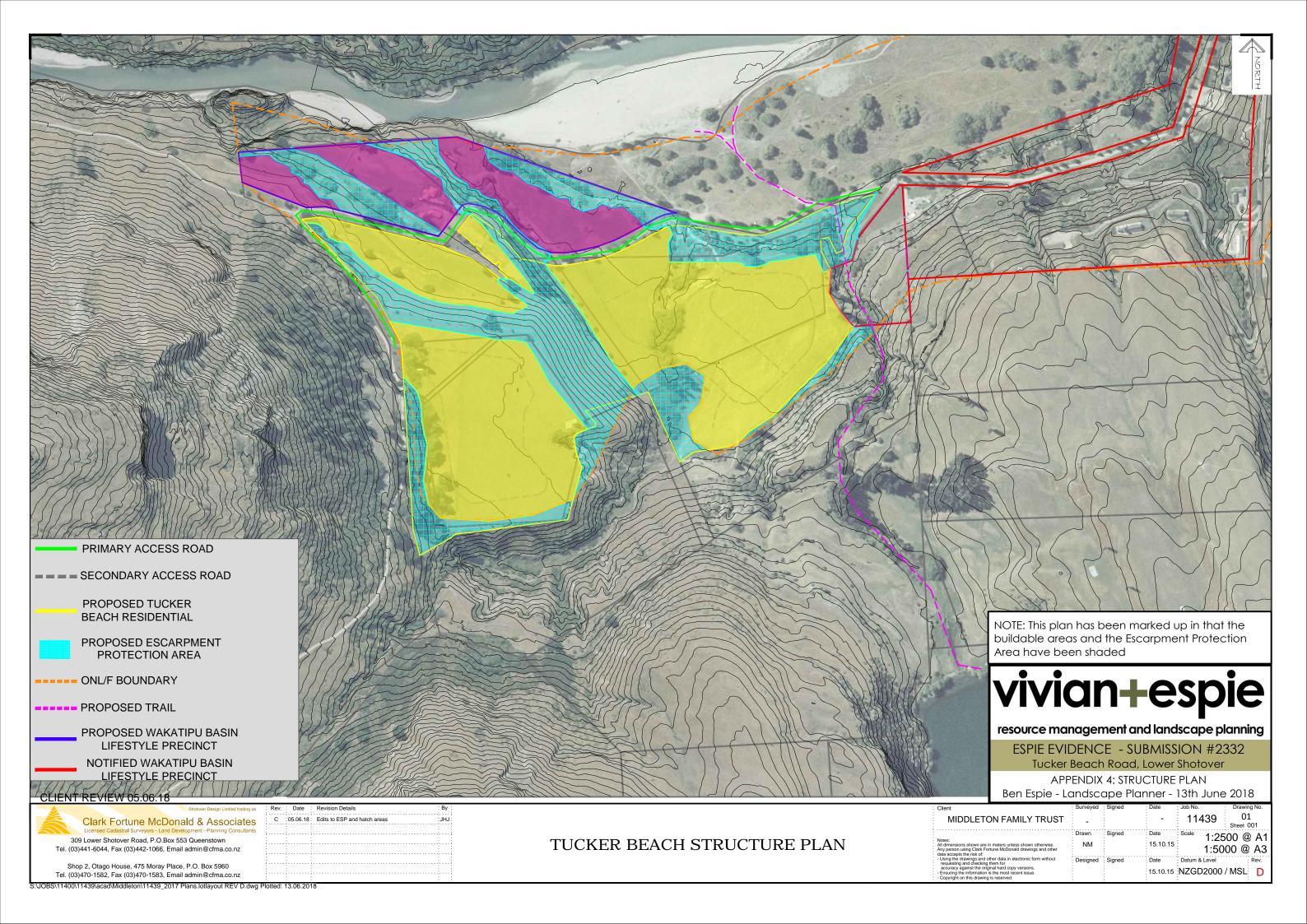
- The topography of the site is particularly flat and easy. This also means that it is less displayed than much of the already developed land within Unit 4.
- The site is geomorphologically distinct from the ONL mountains and from the river corridor. Development can occur on the site without degrading the adjacent ONL land.
- 8.2 In relation to effects on landscape character, the requested relief will have effects in that naturalness and rural character will be reduced, but at a particularly localised scale only and in a way that ties in with its context. In this regard, the site is different to the majority of the Wakatipu Basin. I consider that outside of this particularly localised vicinity, there will be negligible effects on landscape character.
- 8.3 In relation to visual effects, the site sits in a relatively hidden corner of the Wakatipu Basin, however, some nearby areas gain views that will be affected. Effects on visual amenity as experienced from these areas will generally be of a low degree but will range up to a moderate degree for viewers in the western end of the ODP RRZ.
- 8.4 The relief sought has been amended since the time of Ms Gilbert's evidence. In relation to Ms Gilbert's comments, it is important to note that none of the area that is proposed to be zoned sits on the same level as the river flats, it sits on elevated terraces that are well removed from the river and its margins.
- The relief sought will not result in a fragmented pattern of zoning. A large sleeve of rural living zoning will follow Tucker Beach Road with a denser residential node at its end on flat terrace land. This is a logical pattern that responds to landscape considerations.
- 8.6 In an overall sense, I consider that the relief sought has considerable justification on relation to landscape character and visual amenity issues.

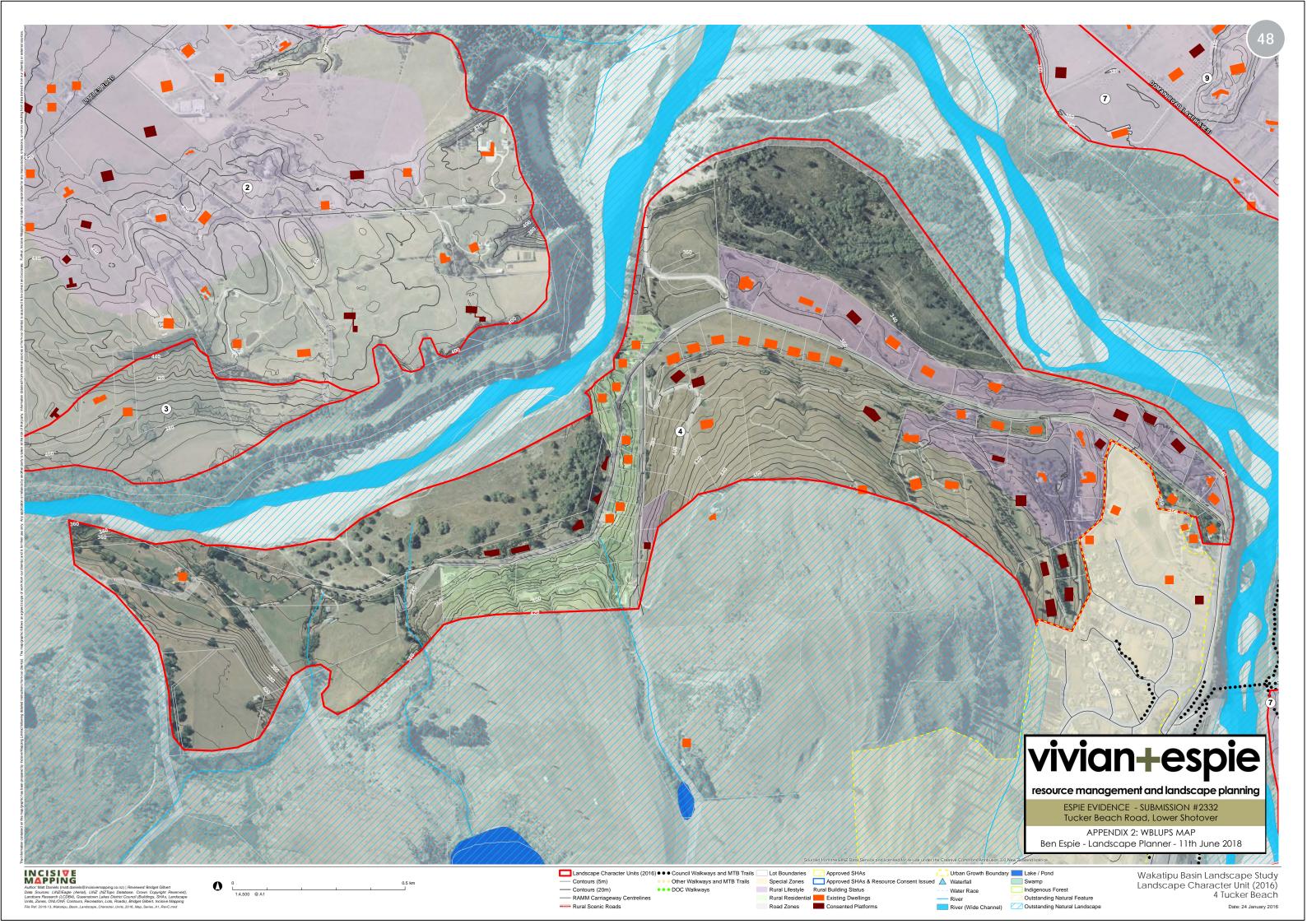


ATTACHED APPENDICES

- 1 PLAN OF REQUESTED ZONING
- 2 MAP OF UNIT 4 FROM THE WBLUPS
- 3 DESCRIPTION TABLE OF UNIT 4 FROM THE WBLUPS
- 4 VIEWPOINT LOCATION MAP
- 5 PHOTOGRAPHS
- 6 TREE SURVEY

Ben Espie vivian+espie 13th April 2018





Landscape Character Unit	4: Tucker Beach
Landform patterns	Flat alluvial river terraces edged and interspersed by steep hill slopes with steep river cliffs along northern edge.
Vegetation patterns	Predominantly exotic vegetation and scrub throughout the steep river cliffs (outside of the LCU) and hill slopes. Exotic amenity plantings around dwellings. Scattered shade trees and scrub in places, with mown grass and grazed areas evident.
Hydrology	The streams drain from Ferry Hill / Lake Johnson environs into the unit.
Proximity to ONL/ONF	Adjacent ONL (WB) of the Shotover River and mountain landform (Ferry Hill environs) to the south.
Character Unit boundaries	North: Shotover River vegetation clad cliffs / ONL East: Quail Rise urban area South: ONL / study area boundary West: ONL / study area boundary
Land use	Rural residential with some working rural uses evident throughout the land at the western end of the unit. A substantial portion of the undeveloped land at the western end of the unit is in DoC ownership.
Settlement patterns	Generally, dwellings and platforms positioned to enjoy highly attractive views of Shotover River and the ONL mountain backdrop. Numerous consented but unbuilt platforms (20). Typical lot size: • central and eastern end of the unit < 4ha (with the odd larger lot: 20-50ha) • western end of the unit: over 500ha.
Proximity to key route	Accessed via a dead - end road.
Heritage features	No buildings / features identified in PDP.
Recreation features	No walkways / cycleways etc. through the area. Substantial DoC reserve land within the central / western portion of the unit.
Infrastructure features	Reticulated water and (some) stormwater / sewer throughout central and western end of the unit. Western end- no reticulated services.
PDP zoning	Rural Residential and Rural Lifestyle throughout central and eastern end. No defensible boundaries to either of these zones or the adjacent Quail Rise urban area. Rural throughout western end.
Visibility/prominence	The containment of the hill slopes to the south means that visibility is limited to the Shotover corridor, the river terraces to the south, and the upper reaches of Fitzpatrick Basin / Dalefield. The lower lying central and northern portions of the unit are not prominent within the wider basin landscape. The elevated hill slopes along the south edge of the unit are locally prominent.

Landscape Character Unit 4: Tucker Beach



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ESPIE EVIDENCE - SUBMISSION #2332 Tucker Beach Road, Lower Shotover

APPENDIX 3: WBLUPS TABLE Ben Espie - Landscape Planner - 11th June 2018

Landscape Character Unit	4: Tucker Beach
Views	The unit affords attractive mid-range views along the river, and to the wider ONL mountain and hill context.
Enclosure/openness	A varying sense of openness within the unit as a consequence of vegetation patterns. Overall, the large-scale landforms framing the local area (particularly to the south) contribute a sense of containment.
Complexity	Steep slopes and plantings provide localised complexity in places.
Coherence	A relatively low level of coherence as a consequence of varying landform and vegetation patterns.
Naturalness	A moderate sense of naturalness throughout the western end of the unit as a consequence of the limited level of built development, its proximity to the Shotover and its position adjacent an undeveloped ONL area. The central and eastern end of the unit is considerably more developed and therefore has a lower perception of naturalness. Reinforced by the close proximity of Quail Rise.
Sense of Place	Generally, the unit reads as a part of the Shotover River margins with a clearly legible patterning of decreasing development as one moves westwards away from Quail Rise.
Potential landscape issues and constraints associated with additional development	Relatively open, exposed and undeveloped nature of the western portion of the unit, within an extremely high value landscape context dominated by ONLs and including a substantial DoC Reserve, makes it highly sensitive to landscape change. Absence of defensible boundaries to existing rural residential and urban zones in the vicinity, make the central and eastern portions of the unit in particular, vulnerable to development creep. Visibility of the development throughout the elevated slopes along the southern edge of the unit.
Potential landscape opportunities and benefits associated with additional development	Close proximity to Queenstown. Relatively contained nature of location. Riparian restoration potential. Potential for integration of walkways / cycleways etc. associated with riverscape. Integration of defensible edges with additional subdivision. Integrating effect of existing development context throughout eastern end of the unit in particular. Easy topography along central and northern portion of the unit. Close proximity of urban infrastructure.
Environmental characteristics and amenity values to be maintained and enhanced	Sense of (relative) remoteness and connection with the riverscape and surrounding mountains at the western end of the unit. Integration of buildings via planting.
Capability to absorb additional development	Low (at western end) Moderate-High (throughout central and eastern end of the unit)

Landscape Character Unit	4: Tucker Beach
Recommended landscape planning strategies (for the central and eastern end of the unit)	infrastructure, external lighting, fencing/gates, riparian planting, framework planting to integrate buildings, views from public places and neighbouring dwellings to the surrounding mountain context and integration of walkway/cycleway routes linking with the DoC Reserve.
	Should an urban density be preferred at the eastern end of the unit , requirement for a Structure Plan process to achieve a coordinated and cohesive development outcome with a clearly legible and robust defensible edge at the western end of the urban area and confinement of buildings to below the 400m contour on the south side of the unit and consideration of views from public places and neighbouring dwellings to the surrounding mountain context.



ESPIE EVIDENCE - SUBMISSION #2332

Tucker Beach Road, Lower Shotover
APPENDIX 3: WBLUPS TABLE

APPENDIX 3: WBLUPS TABLE

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Stretch of Littles Road and Domain Road from which views to the site are available Stretch of the Shotover River covered by Shotover Jet Ltd's operating license



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VIEWPOINT LOCATION 1: LITTLES ROAD



VIEWPOINT LOCATION 2: DOMAIN ROAD





Proposed Tucker
Beach Road
Residential Precinct



Proposed Wakatipu Basin Lifestyle Precinct

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APPENDIX 5: VIEWPOINT LOCATION PHOTOGRAPHS Ben Espie - Landscape Planner - 11th June 2018



VIEWPOINT LOCATION 3: TUCKER BEACH RESERVE



VIEWPOINT LOCATION 4: ADJACENT TO 331 TUCKER BEACH ROAD

Key



Proposed Tucker Beach Road Residential Precinct



Proposed Wakatipu Basin Lifestyle Precinct

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APPENDIX 5: VIEWPOINT LOCATION PHOTOGRAPHS Ben Espie - Landscape Planner - 11th June 2018



VIEWPOINT LOCATION 5: HANSEN ROAD



VIEWPOINT LOCATION 6: HANSEN ROAD

<u>Key</u>



Proposed Tucker Beach Road Residential Precinct



Proposed Wakatipu Basin Lifestyle Precinct

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APPENDIX 5: VIEWPOINT LOCATION PHOTOGRAPHS
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