

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

**IN THE MATTER** of the Resource Management  
Act 1991

**AND**

**IN THE MATTER** of Hearing Stream 11 –  
Ski Area Sub Zones  
Mapping Annotations and  
Rezoning Requests

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**REBUTTAL EVIDENCE OF MARION READ  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**LANDSCAPE**

**20 April 2017**

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## TABLE OF CONTENTS

1. INTRODUCTION .....	3
2. SCOPE .....	3
3. MR SKELTON FOR NZSKI LIMITED (572) .....	4
4. MS PFLUGER FOR SOHO CREEK LTD & BLACKMANS CREEK NO 1 LP (610) .....	7
5. MS PFLUGER FOR TREBLE CONE INVESTMENTS LTD (613) .....	10
6. MOUNT CARDRONA STATION LTD (407) .....	11

## 1. INTRODUCTION

- 1.1 My full name is Marion Read. I am a Landscape Planner and principal of my own consultancy, Read Landscapes.
- 1.2 My qualifications and experience are set out in my statement of evidence in chief dated 10 March 2017.
- 1.3 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise except where I state that I am relying on the evidence of another person.
- 1.4 All references to PDP provision numbers, are to the Council's Reply version of those provisions (unless otherwise stated).

## 2. SCOPE

- 2.1 My rebuttal evidence is provided in response to the following evidence filed on behalf of various submitters:
- (a) Mr Skelton for NZSki Ltd (**NZSki**) (572);
  - (b) Mr Dent for NZSki (572);
  - (c) Ms Pfluger for Soho Ski Area Ltd and Blackmans Creek No 1 LP (**Soho**) (610);
  - (d) Mr Ferguson for Soho;
  - (e) Ms Pfluger for Treble Cone Investments Ltd (**TCI**) (613);
  - (f) Mr Espie for Mount Cardrona Station Ltd (**MCS**) (407); and
  - (g) Mr Brown for MCS (407).
- 2.2 I have also read the evidence of Mr Ferguson for TCI.

### **3. MR SKELTON FOR NZSKI LIMITED (572)**

3.1 Mr Skelton has filed landscape evidence in relation to the extensions of the Ski Area Sub Zone (**SASZ**) within the Remarkables Ski Field area.

#### **Area 1: Remarkables Ski Area Extension**

3.2 Mr Skelton states at his paragraph 6.3 that in response to the sensitivity of the Lake Alta Basin, restrictions on earthworks and building in this area are volunteered. Mr Dent proposes a new rule at paragraph 98 of his evidence that would prohibit the construction of buildings or infrastructure or the undertaking of earthworks in this area. This is a greater level of protection than is offered by the underlying Rural zoning.

3.3 In response to the preliminary reason for the rezoning, being to legalise avalanche control (a SAA), I understand that it was never Council's intention to restrict previously permitted activities such as avalanche control, skiing and boarding, ski patrols and related permitted activities to the SASZ. Ms Banks discusses this at paragraphs 12.30 to 12.38 of her Strategic S42A report and I adopt her position that amendment to Rule 21.4.19 (which she proposes) is appropriate. I also note that in paragraph 4.20 of her Specific 42A report she identified that these types of activities do not require consent.

3.4 Consequently, the justification provided by the submitter for the extension of the SASZ into the Lake Alta cirque is negated. At the same time, the extension plus the proposed prohibition on structures, buildings and earthworks with the proposed SASZ extension would provide a greater degree of protection to this part of the feature than its Rural zoning and ONL status. While this would clearly be positive from a landscape perspective, it would create something of an anomaly, providing a higher level of protection but only over a small part of the overall feature of the Lake Alta cirque. I remain of the opinion that the SASZ should not be extended into this area.

- 3.5 Mr Skelton states at paragraph 6.14 that the ridgeline between points 2035 and 2057 marks the boundary between the Queenstown Lakes District and Central Otago District.
- 3.6 This is incorrect. The administrative boundary does pass over the summit of the 2035m peak and follows the ridgeline to the 1934m peak, but to the east of that point the administrative boundary is between 20 and 40m below the ridgeline and to its south east.
- 3.7 Mr Dent has filed planning evidence in relation to the extension of the ski area within the Remarkables Ski Field area.
- 3.8 Mr Dent states at paragraph 105 of his evidence that once the base building is reached "*...the landscape is dominated by human modification with roads, lift structures, buildings and other snow making equipment*".
- 3.9 I consider Mr Dent considerably overstates the influence of the ski infrastructure on the landscape. I accept that awareness of the ski infrastructure is inescapable once in the Rastus Burn basin. The landscape, however, is still totally dominated by the natural landforms and indigenous vegetation of the alpine area. If this were not the case, or Mr Dent is correct, then development of the area must already have exceeded the purpose of the zone which states that it is to enable various activities "*where the effects of the development are cumulatively minor*".<sup>1</sup>
- 3.10 At paragraphs 106 to 110 Mr Dent discusses the Proposed District Plan (**PDP**) rules for buildings and passenger lifts. He notes that in the latter case the rules allow for them to breach the skyline or ridgelines. He states at paragraph 110 that, "*Accordingly, such features and impacts on landscape value are already recognised in the Operative and PDP as being suitable subject to appropriate siting*".
- 3.11 This is the case, but the ODP and PDP are directed at achieving appropriate development within identified SASZs. To use the

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<sup>1</sup> PDP, 21.1 Zone Purpose, P 21-1.

existence of these controls within the existing SASZ as an argument to establish a new SASZ, or as in this case, an extension to it, is a circular argument. The potential for adverse effects on the broader landscape should determine the location of the boundaries of the zone, within which the proposed rules then apply. In my opinion the existing location of this boundary in the Rastus Burn basin is both appropriate and necessary to ensure this occurs.

3.12 At paragraphs 111 to 118 Mr Dent describes the "belt and braces" effect which exists with regard to activities within the Rastus Burn basin.

3.13 I accept that any development within this area is subject to consent from the Department of Conservation as well as QLDC. I do not consider that the Council should rely on another agency to manage its landscapes, however, as the priorities and directions of that agency may vary from those supported by the QLDC ratepayers. I consider that the QLDC approach should be sufficiently robust that its decisions can stand alone, even if its position differs from that of the Department of Conservation.

#### **Area 2: Proposed 'Ski Area Sub Zone B'**

3.14 Mr Skelton discusses the proposed Area 2 extension to the SASZ at paragraphs 6.18 to 6.27 of his evidence. I note that in his discussion of the possible visibility of development within the site he fails to recognise that the ski field access road is a public place and consequently does not consider the impact of potential development from that location.

3.15 I do note that at paragraph 6.22 Mr Skelton states he has recommended that the uphill boundary of the SASZ be located where he considers the ONL boundary should be located. This is not where the ONL boundary is located in the notified PDP and no submissions have been made in regard to its location on this site.

3.16 Mr Skelton also fails to acknowledge that one of the effects of rezoning this area to SASZ is that earthworks become a permitted

activity.<sup>2</sup> He also notes at paragraph 6.26 that there is no significant indigenous vegetation on the site. In the high alpine areas, while earthworks are currently permitted within the SASZ under the ODP framework, indigenous vegetation clearance still requires consent under the PDP. This means that Council exerts some control over the effects of earthworks, if not over the earthworks themselves. In this proposed Area 2 I consider it doubtful that consent for the clearance of indigenous vegetation would be required, given the location under 1070masl and assuming the standards in Rule 33.5 were met. Consequently earthworks in this area could be undertaken without any requirement for mitigation or rehabilitation. This could result in significant adverse effects on landscape character and quality and on visual amenity.

3.17 I also consider that Mr Skelton fails to appropriately consider the types of activity that could be anticipated on the site should the SASZ be extended in this way. Buildings would be controlled, up to 8m in height. Ancillary retail activities are also controlled. There is no definition of exactly what these might include but I would not consider it unreasonable to include ticketing, and the sale of equipment, and apparel. It is possible that NZSki, were it to exploit the proposed zoning fully, could create something of a node of ski related activities within this site which would be incongruous within the surrounding landscape. Such a node would have an adverse effect on the character and quality of the surrounding landscape and on the visual amenity of members of the public, in particular.

#### **4. MS PFLUGER FOR SOHO CREEK LTD & BLACKMANS CREEK NO 1 LP (610)**

4.1 Ms Pfluger has filed landscape evidence in relation to the proposed extension of the SASZ adjacent to the existing Cardrona SASZ in the Cardrona Valley. I note that this evidence clarifies that the primary objective of extending the SASZ in this location is to facilitate the future construction of a gondola.

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<sup>2</sup> ODP, 22.2.3.1(c).P22-5.

- 4.2 At paragraph 28 Ms Pfluger states that I have said that the proposed extension to the SASZ extends into the Arrow River and Wakatipu visual catchments. On rereading paragraph 58 of my primary evidence, I accept that it is unclear. The existing SASZ extends into the visual catchments of both the Arrow River and the broader Wakatipu Basin. The proposed extension requested by the submitter has part of its highest boundary located on the top of a spur extending to the south west from the summit of Mount Cardrona. Development on or close to this boundary would be within the Arrow River visual catchment but not the Wakatipu visual catchment. I note that the Blackmans Creek snow cat shed consented by RM140886 and located within the existing SASZ but upslope of the proposed extension, is within both visual catchments.
- 4.3 At paragraph 37 Ms Pfluger notes that the upper Cardrona Valley from the Crown Range summit to Cardrona township shows, "*...very little, if any modification...with the road and its associated infrastructure (bridges and culverts) being the only significant man-made structure [sic]*".
- 4.4 At paragraph 62 Ms Pfluger discusses the potential visibility of a gondola from the Cardrona Valley Road to the south of Cardrona village.
- 4.5 In my opinion, Ms Pfluger, while discussing in some detail the potential visibility of a gondola from the road to the south, fails to address the effects of this visibility, having noted herself that there are few man-made structures within this landscape character area. I consider that the intrusion of such a structure into the views available from the road in this area would significantly detract from the natural character of those views. It would also significantly detract from the experience of remoteness, which the lack of structures and obvious modifications to the landscape provides.
- 4.6 At paragraph 64 Ms Pfluger distinguishes between residential development and a gondola with associated buildings in relation to "sprawl". She asserts that as the character of the potential



development is distinctly different to the adjacent residential development, it does not constitute sprawl.

- 4.7 The Oxford Compact English Dictionary defines "sprawl" in relation to a town as "of irregular or straggling form".<sup>3</sup> It is not a matter of character, but a matter of configuration. It is my opinion that natural landforms, where possible, make the best boundaries to areas of development and I continue to be of the opinion that development of the type anticipated just outside of the natural southern edge to Cardrona township would constitute undesirable sprawl.
- 4.8 At paragraphs 73 and 74 Ms Pfluger states that the presence of the SASZs within the ONLs of the District needs to be recognised and that the existing ski fields contain structures and substantial modifications to the landforms.
- 4.9 I accept that the ski fields have resulted in modifications to the landscape through earthworks and the erection of structures. Unlike the SASZ boundaries, this development is reasonably contained within the surrounding landforms. Consequently, the ski fields of the Remarkables, Cardrona, Treble Cone, Snow Park, and Snow Farm have a negligible effect on the overall quality of the ONL of the mountains in which they are located. I agree that the intensification of development within these discrete areas is entirely acceptable, but note that these areas do not coincide with the wider extent of the SASZ boundaries.
- 4.10 At paragraph 77 Ms Pfluger states that, "*Typically, the majority of built form associated with existing ski areas is located close to, or on top of a ridge due to operational and functional requirements*".
- 4.11 I disagree. Coronet Peak ski field is located on the open face of the mountain. There is an observatory building right on the summit of the mountain, and the top station of a chairlift adjacent, but the majority of the infrastructure on that field is below the ridgeline. The Remarkables ski field is entirely contained within the Rastus Burn basin. No structures within it are located on or breach a ridgeline.

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<sup>3</sup> Oxford Compact English Dictionary. Oxford University Press: Oxford (1996).

The Cardrona ski field is located within two basins close to the summit of Mount Cardrona. The terminal building of the McDougall's Express chondola is (or will be) located on the ridgeline, all of the other buildings being located downslope. The entire Snow Park and Snow Farm fields, including buildings is located on the rolling summit of the Pisa Range. I am not familiar with the existing Treble Cone ski field, but an examination of the site undertaken on Google Earth suggests that no buildings are located on the ridgeline.

## **5. MS PFLUGER FOR TREBLE CONE INVESTMENTS LTD (613)**

- 5.1 Ms Pfluger has also filed landscape evidence in relation to the proposed extension of the SASZ adjacent to the existing Treble Cone SASZ in the Motatapu Valley. I note that this evidence clarifies that the primary objective of extending the SASZ in this location is also to facilitate the future construction of a gondola and base buildings. In this instance Treble Cone Investments Ltd has resource consent to construct such facilities granted by RM160587.
- 5.2 At paragraph 50 Ms Pfluger notes that a gondola and related facilities was an acceptable landscape outcome in this location. I note that she incorrectly states that this was an Environment Court decision.
- 5.3 At paragraph 54 Ms Pfluger propounds the idea of a Ski Area Facilities overlay to identify the approximate area for which the gondola consent exists. She states that this would allow buildings as a controlled activity. She also proposes two further matters of control to amend 21.5.27 of the PDP.
- 5.4 I note the construction of buildings within the SASZ is already controlled. Consequently it is hard to see, from a landscape perspective, what advantage the Ski Area Facilities overlay would provide. It would not protect the landscape of the valley floor from inappropriate building. This could be done by terminating the extension to the SASZ at the edge of the area in which the gondola and related development is consented, leaving the valley floor zoned Rural.

- 5.5 With regard to the proposed matters of control, these are:
- (a) Landscape and amenity values; and
  - (b) Natural conservation values.
- 5.6 I support the inclusion of these additional matters of control over the construction of buildings (21.5.27).

**6. MOUNT CARDRONA STATION LTD (407)**

- 6.1 Mr Espie has filed landscape evidence in relation to the proposed extension of the SASZ between the existing Cardrona SASZ and the Mount Cardrona Station Special Zone (**MCSSZ**) in the Cardrona Valley.
- 6.2 At paragraph 4.1 of his evidence Mr Espie asserts that I have not raised any issues regarding cumulative effects in my original evidence.
- 6.3 This is incorrect. I discuss this at paragraph 5.25 of my evidence. I do appreciate that the paragraph lacks clarity. My opinion is that possible development within the SASZ extension including a gondola would have an adverse cumulative effect on the landscape of the vicinity, accepting that a gondola appears, from the MCSSZ structure plan, to be anticipated. It is also my opinion that a gondola would have an adverse cumulative effect on the landscape in conjunction with the consented, but as yet unbuilt, gondola to the Snow Farm.
- 6.4 Mr Brown has also filed planning evidence in relation to the proposed extension of the SASZ between the existing Cardrona SASZ and the MCSSZ in the Cardrona Valley.
- 6.5 At paragraph 3.1(h) Mr Brown interprets my evidence to suggest that I am not concerned about the effects of a gondola within the proposed SASZ extension.

6.6 It would be more correct to say that I am less concerned about the effects of a gondola than I am about the other activities that could occur. I understand that Mr Brown has recommended changes to the PDP rules to make any activities other than the construction of a gondola non-complying. This amendment would effectively address my concerns regarding other activities.



**Marion Read**  
**20 April 2017**