

Before an Independent Hearings Panel

Appointed by the Queenstown Lakes District Council

under: the Resource Management Act 1991

In the matter of: Submissions and Further submissions
on the Queenstown Lakes
Proposed District Plan

and: Urban Intensification Variation

and: Arthurs Point Trustees Limited
(Submitter 1260)

And

Arthurs Point Trustees Limited
(Further Submitter 1338)

Statement of Planning Evidence of John Edmonds

4 July 2025

1.0 Introduction

- 1.1 My full name is John Bernard Edmonds.
- 1.2 I hold the qualification of a Bachelor of Regional Planning from Massey University. I am a full member of the New Zealand Planning Institute.
- 1.3 I have 34 years' experience in planning and resource management roles, including strategic planning, master planning, urban design, policy development, project management and other resource management consultancy services. I have worked in both local government and private sector roles.
- 1.4 My previous roles include five years at Nelson City Council and six years with the Queenstown Lakes District Council (QLDC), most of that time (1997-2001) as the District Planner.
- 1.5 In January 2001 I went into private consultancy, establishing John Edmonds & Associates. In this role I have managed planners, environmental scientists and more recently surveyors and project managers. I have been personally responsible for master planning, strategic planning, preparing resource consent applications and assessments of effects, and been the principal consultant assisting with planning and environmental issues for a range of significant local developments. I have also presented evidence at Council and Environment Court hearings.
- 1.6 I am familiar with submission 1260 on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and the submitter's interests in land at 182 Arthurs Point Road, Arthurs Point.

2.0 Code of Conduct

- 2.1 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Environment Court's Code of Conduct for Expert Witnesses in its Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. 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.

3.0 The Submitter

3.1 Arthurs Point Trustees Limited owns 14.7 hectares of land at Arthurs Point. The land is split zoned High Density Residential, Medium Density Residential and Rural.

3.2 The submitter has numerous resource consents to develop the land in accordance with the zoned intent. These consents are set out in the table below.

Consent #	Date of decision	Consented activity
RM191333	7 August 2020	296 visitor accommodation units in 13 buildings (Blocks A to E) on the Upper Terrace and part of the Mid Terrace
RM200384	13 November 2020	35 residential units on the balance of the Mid Terrace
RM201080	30 March 2022	Residential unit with the Rural Zone on the Lower Terrace
RM220260	4 July 2022	Helipad – Rural Zone on the Lower Terrace
ET191333	25 October 2022	Extension of lapse date of RM191333 until 12 October 2031
ET200384	25 October 2022	Extension of lapse date of RM222384 until 13 October 2031

4.0 The Site Context

4.1 The submitter's land is located at Arthurs Point, on the eastern side of the Edith Cavell Bridge, and comprises three terraces. The Upper Terrace is mostly zoned High Density Residential, the Middle Terrace is zoned Medium Density Residential, whilst the Lower Terrace is zoned Rural.

4.2 I have attached extracts of the relevant resource consent plans for the Upper and Mid Terraces.

4.3 Block E is located on the north-western corner of the Mid Terrace and comprises three apartment buildings generally 12m high, in compliance with the (ODP) Rural Visitor zone rules that applied at that time.

- 4.4 All three Terraces were brought into the PDP through Stages 1 and 3 of the review. The third stage reviewed the Rural Visitor zoning of the Upper and Mid Terraces, and the owner accepted Medium Density Residential zoning over all of the Mid Terrace.
- 4.5 At that point in time, the land owner had secured the above mentioned resource consents to develop the land for a mix of apartments and terrace houses.
- 4.6 The Mid Terrace comprises 2.5 hectares of gently sloping land, accessed from a driveway that extends around the western side of the site. There is vertical separation of about 20m between the Upper and Mid Terrace. The land below the Mid Terrace drops away steeply towards the Shotover River. The block of land below the Mid Terrace is also owned by the submitter and is heavily treed with sycamore and other non-native species. A recently vested public walking and cycle trail extends through this forest approximately 110m laterally from and 65m vertically below the terrace edge.

5.0 The Submission

Submission #	Summary	S.42a Recommendation
1260.1	That the intent of the variation is generally supported, subject to the amendment identified in this submission.	Accept in part
1260.2	That the general intention to increase building height limits in the Variation for the HDR and MDR is supported.	Accept in part
1260.3	That the general intention to increase building height limits in the Variation for the HDR and MDR is supported.	Accept in part
1260.4	That the District Plan mapping that applies to this site be amended by removing reference to the Mid Terrace at 182 Arthurs Point Road being affected by Rule 8.5.5.1(a).	Reject
1260.5	That any reference to the site at 182 Arthurs Point Road or any other map or rule that distinguishes this site be deleted.	Reject

6.0 Details of Submissions in Contention

6.1 The key issue relates to identification of an 8m height restriction for the mid terrace.

6.2 The reasons for the submission are set out at paragraph 16 of the submission (1260).

6.3 The section 42a reports assess the submission at:

- Paragraphs 8.6 to 8.8 of the Urban Design (Wallace) Statement of Evidence
- Paragraphs 4.101 to 4.122 of the Chapter 8 and 9 (Frischknecht) Statement of Evidence
- Paragraphs 11.11 and 11.12 of the Rezonings (Morgan) Statement of Evidence

6.4 The rationale provided for limiting building height to 8m is:

The mid terrace is less proximate to Arthurs Point, and is described as having low accessibility relative to other areas of Queenstown.

6.5 The officer (Morgan) acknowledges at 10.12 “the potential that the site offers for comprehensive development”, but requires more detailed background on the consenting history and evidence should address potential effects on landscape values of the Kimiakau (Shotover River) Landscape Priority Area.

6.6 Mr. Milne’s evidence addresses the landscape character.

6.7 It is unclear why a more detailed description of the consenting history would influence the officer’s recommendation on the appropriate height limit that should apply to the Mid Terrace. However, as described earlier, there is a comprehensive set of resource consents for all three Terraces.

6.8 These consents remain in effect until 2031, and will result in 330 residential units, some of which may be used for visitor accommodation purposes. The Census data for Arthurs Point indicates that there are 570 ‘private dwellings’ in the Arthurs Point catchment in 2023. The Statistical Area covers the urban extent of the Arthurs Point community across both sides of the Shotover River.

6.9 The current consents indicate that this site will potentially contain about one third of the dwellings in this community.

6.10 There is a combination of factors that point towards the land close to the subject site becoming the focus of the Arthurs Point community, including:

- the comparatively flat topography in the vicinity of the subject site;
- proximity to the arterial transport route;
- the close proximity of the public transport stops;
- the new Queenstown-Arrowtown route;
- the existing built character, zoning;
- implemented and unimplemented resource consents in the vicinity; and
- the close proximity of other commercial and visitor accommodation activities.

6.11 Intensification will occur in the Arthurs Point neighbourhood, particularly in the vicinity of the subject site, and it is appropriate that appropriate building heights are enabled.

6.12 I note that at paragraph 4.119 and 4.120 the officer appears to imply that 12m high buildings were consented on the Mid Terrace because of the mitigation provided by the detailed planting plans and specific schedule of materials. To clarify, the 12m height limit was permitted where buildings were to be used for visitor accommodation purposes, and inclusion of landscape mitigation and detailed schedules of colours and materials is a standard expectation of any resource consent.

Further, the council decision states that '12m high buildings are anticipated in this location and it is the use rather than the buildings that trigger this non-compliance' (page 11 of RM191333).

7.0 Further Submissions

7.1 The submitter has made three further submissions in support of others in the Arthurs Point neighbourhood.

Original Submission	Further Submission	Support or Opposition
833.29 QRC Shotover Limited	1338.1	Support
830.1 Robert Stewart	1338.2	Support
487.3 Robert Stewart	1338.3	Support

8.0 Conclusion

8.1 It is my opinion that an 11m height limit is appropriate on the Mid Terrace of 182D Arthurs Point Road, and best gives effect to the amended objectives and policies of the Medium Density Residential Zone.

8.2 I do not consider that there is adequate justification to sustain a separate height rule for this site.

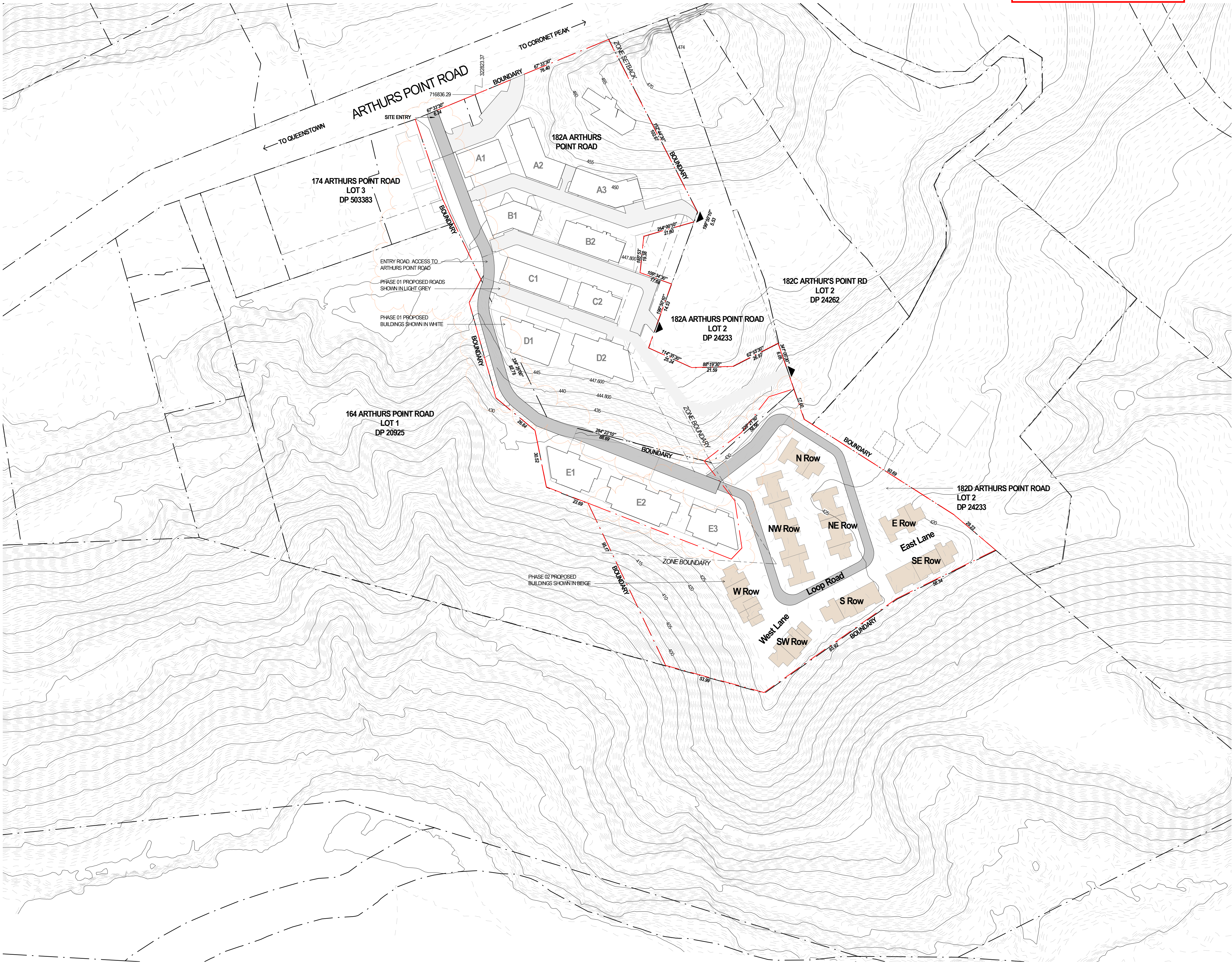
John Edmonds

Dated 4 July 2025

QUEENSTOWN LAKES DISTRICT COUNCIL

APPROVED PLAN:
RM200384

Thursday, 12 November 2020



All dimension to be verified on site before producing shop drawings or commencing any work. Do not scale. The copyright of this drawing remains with Warren and Mahoney Architects Ltd.

Revisions

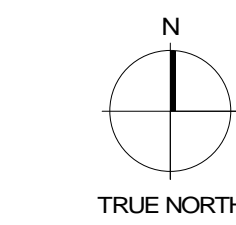
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B	01/05/20	RESOURCE CONSENT
C	04/08/20	RC RFI
D	27/08/20	RC RFI

Notes

KEY

	PROPOSED SEALED SURFACE
	PROPOSED BUILDINGS
	P1 PROPOSED SEALED SURFACE
	P1 PROPOSED BUILDINGS
	SITE BOUNDARY
	OTHER BOUNDARIES

	ACCESS TO EXISTING NEIGHBOURS
--	-------------------------------



Consultants

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Civil Engineer
Holmes Consulting Group Ltd
Geotechnical Engineer
Tonkin & Taylor Ltd
Traffic Engineer
Carriageway Consulting Ltd
Surveyor
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Registered Architects and Designers
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Project Title

ARTHUR'S POINT

182 Arthur's Point Road
Queenstown
Lot 1, 2&3, DP 300462
Lot 2, DP 24233

Drawing Title

FULL SITE PLAN -
PROPOSED

Drawing Status

RESOURCE
CONSENT

Drawing Details

Scale	As indicated@ A1
Date	27/08/20
Job No	7755
Drawn	WAM
Checked	WAM

Drawing No

A 0.04 P2

Revision

D

QUEENSTOWN LAKES DISTRICT COUNCIL

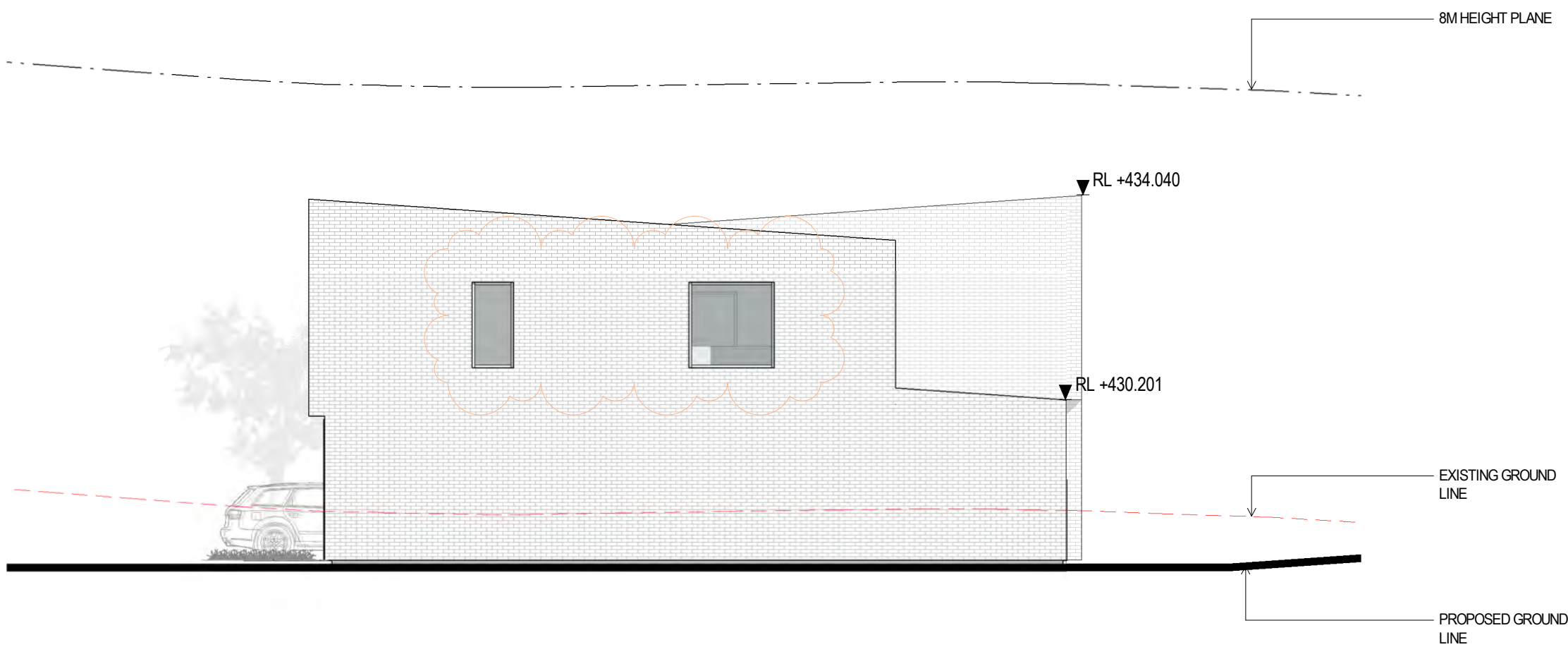
APPROVED PLAN:
RM200384

Thursday, 12 November 2020



KEY PLAN

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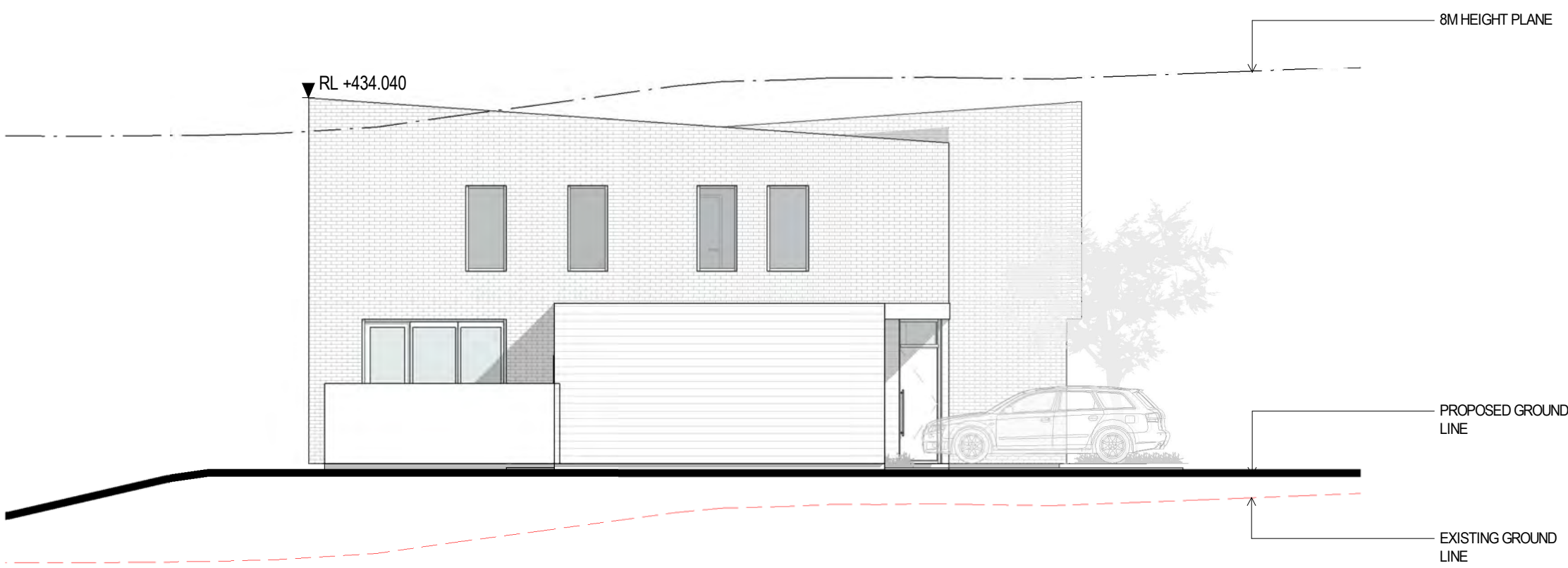
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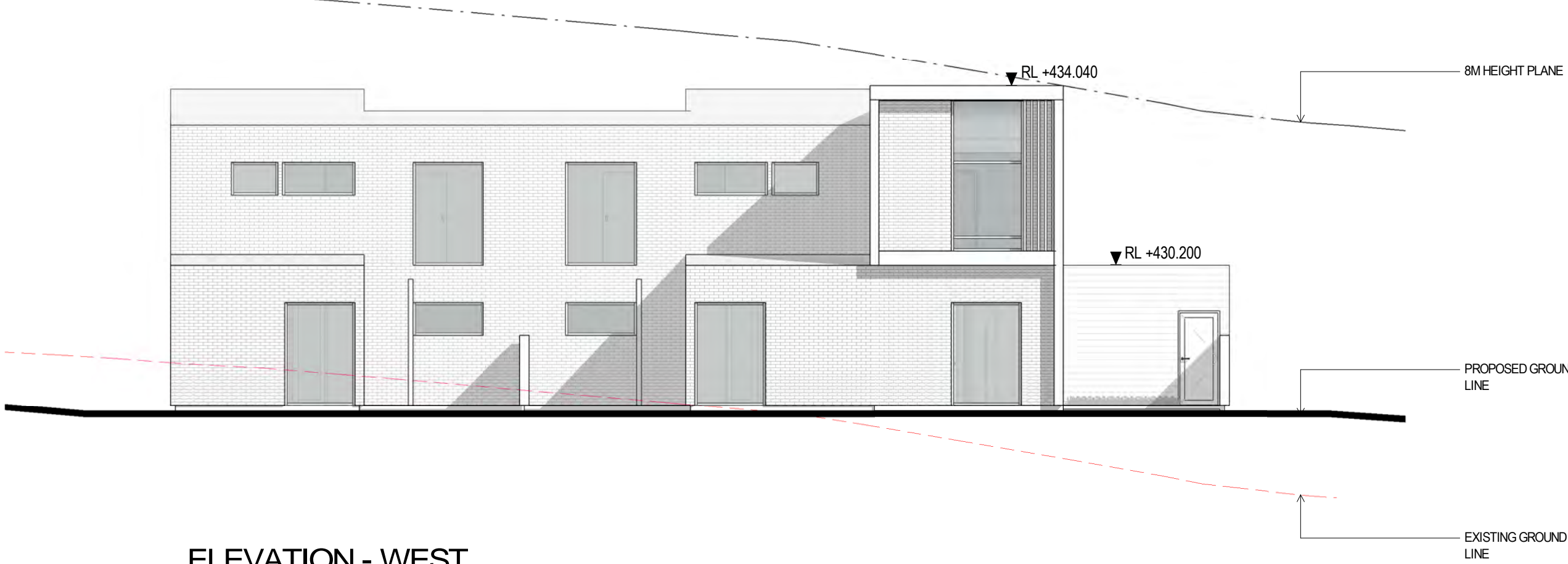
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ELEVATION - SOUTH

1:100



ELEVATION - WEST

1:100

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Revisions

A 01/05/20 RESOURCE
CONSENT

B 04/08/20 RC RFI

Notes

MATERIAL LEGEND

- BRICK CLADDING
- TIMBER WEATHER BOARD CLADDING (DARK)
- CLEAR GLAZING
- DARK ROOFING

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Project Title

7755 ARTHURS
POINT

182 Arthur's Point Road
Queenstown
Lot 1, 2&3, DP 300462
Lot 2, DP 24233

Drawing Title

NORTH ROW
ELEVATIONS

Drawing Status

RESOURCE
CONSENT

Drawing Details

Scale As indicated@ A1

Date 04/08/20

Job No 7755

Drawn WAM

Checked WAM

Drawing No

N 2.01

Revision

(B)

QUEENSTOWN LAKES DISTRICT COUNCIL

APPROVED PLAN:
RM200384

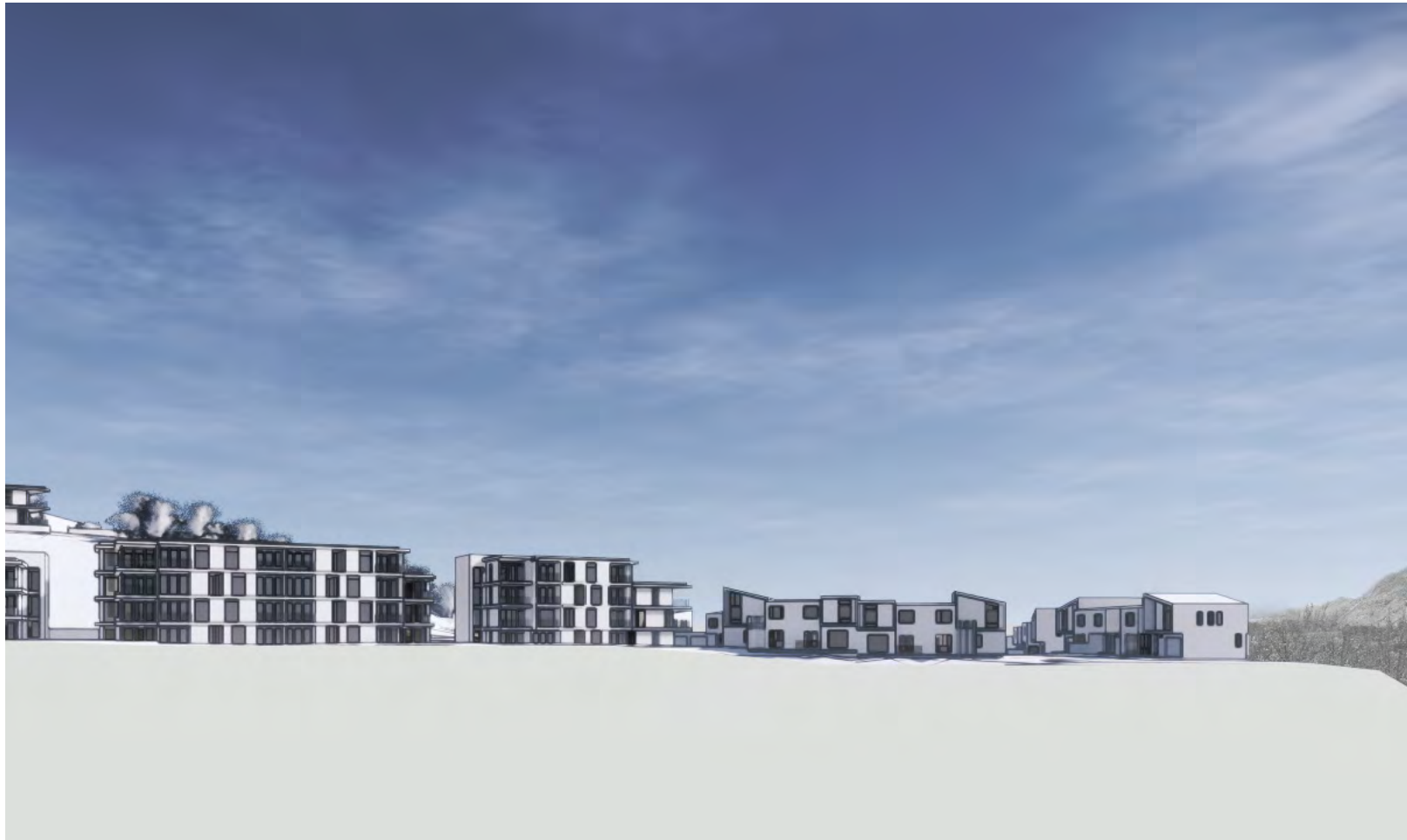
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Revisions

A 01/05/20 RESOURCE
CONSENT

Notes



VIEW FROM WEST
WEST & SW ROWS



VIEW FROM SOUTH
WEST , SW, SOUTH, SE ROWS



VIEW FROM EAST
SE, EAST, NE, NORTH ROWS



VIEW FROM NORTH
FROM EDGE OF UPPER TIER



WITHIN SITE
NW ROW FROM SW CORNER



WITHIN SITE
NW ROW FROM NORTH

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Project Title

ARTHUR'S POINT

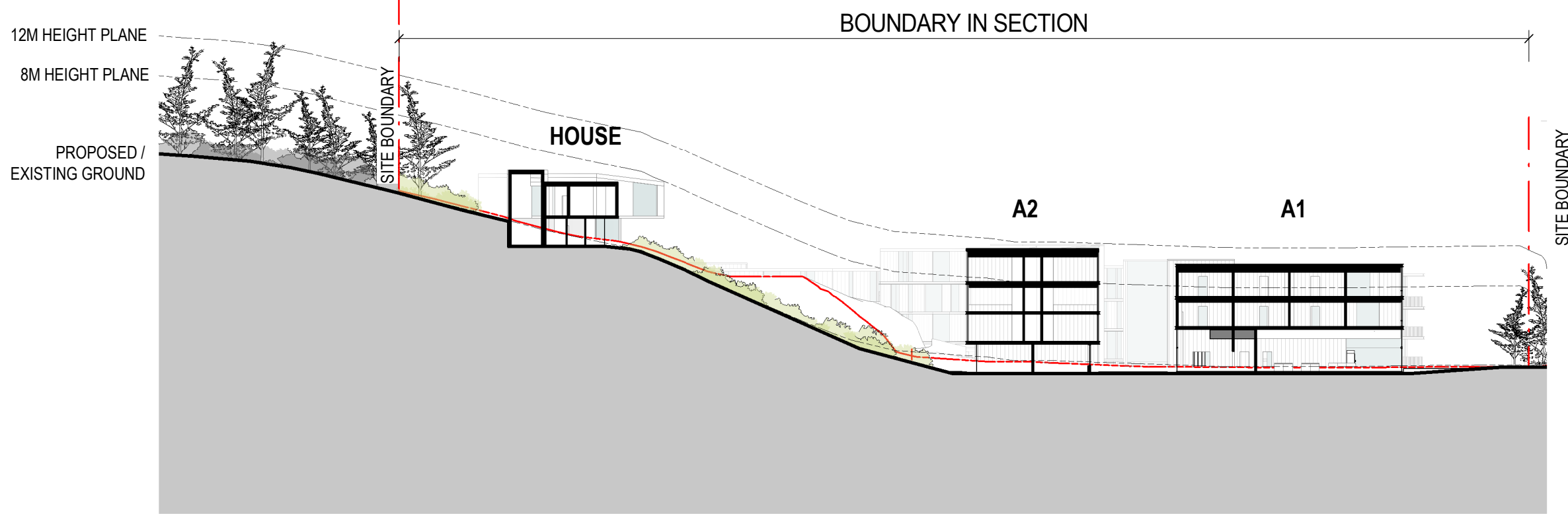
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Queenstown
Lot 1,2&3, DP 300462
Lot 2, DP 24233

Drawing Title

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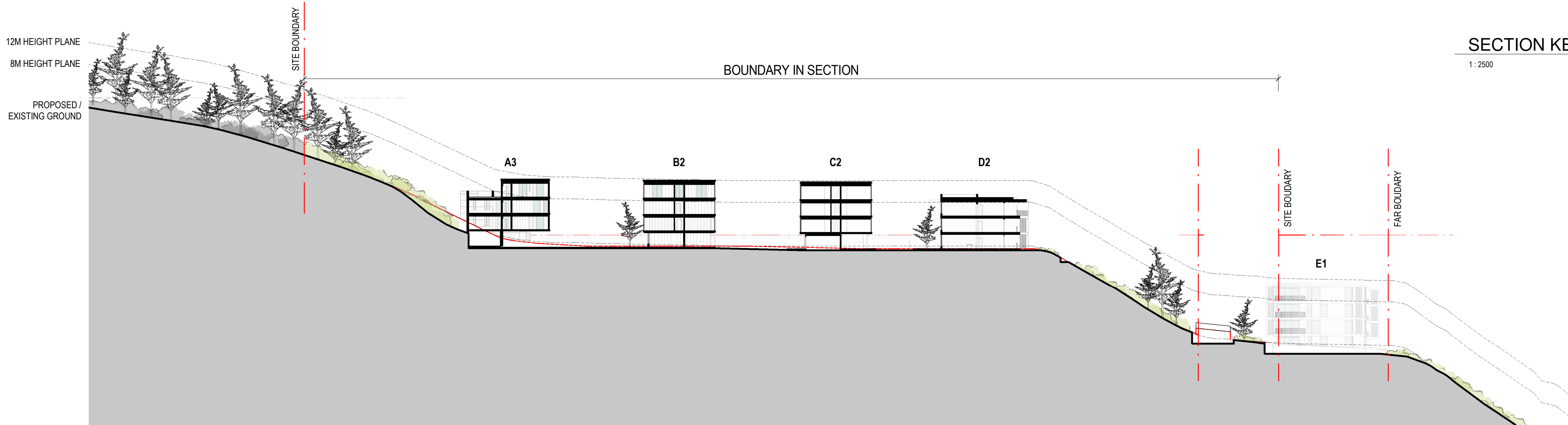
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RESOURCE
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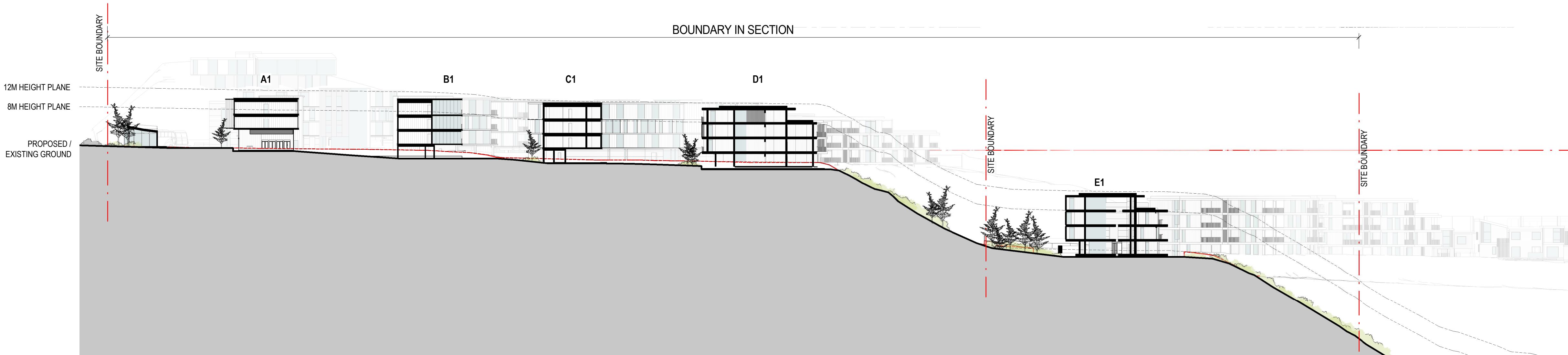
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SITE SECTION 2

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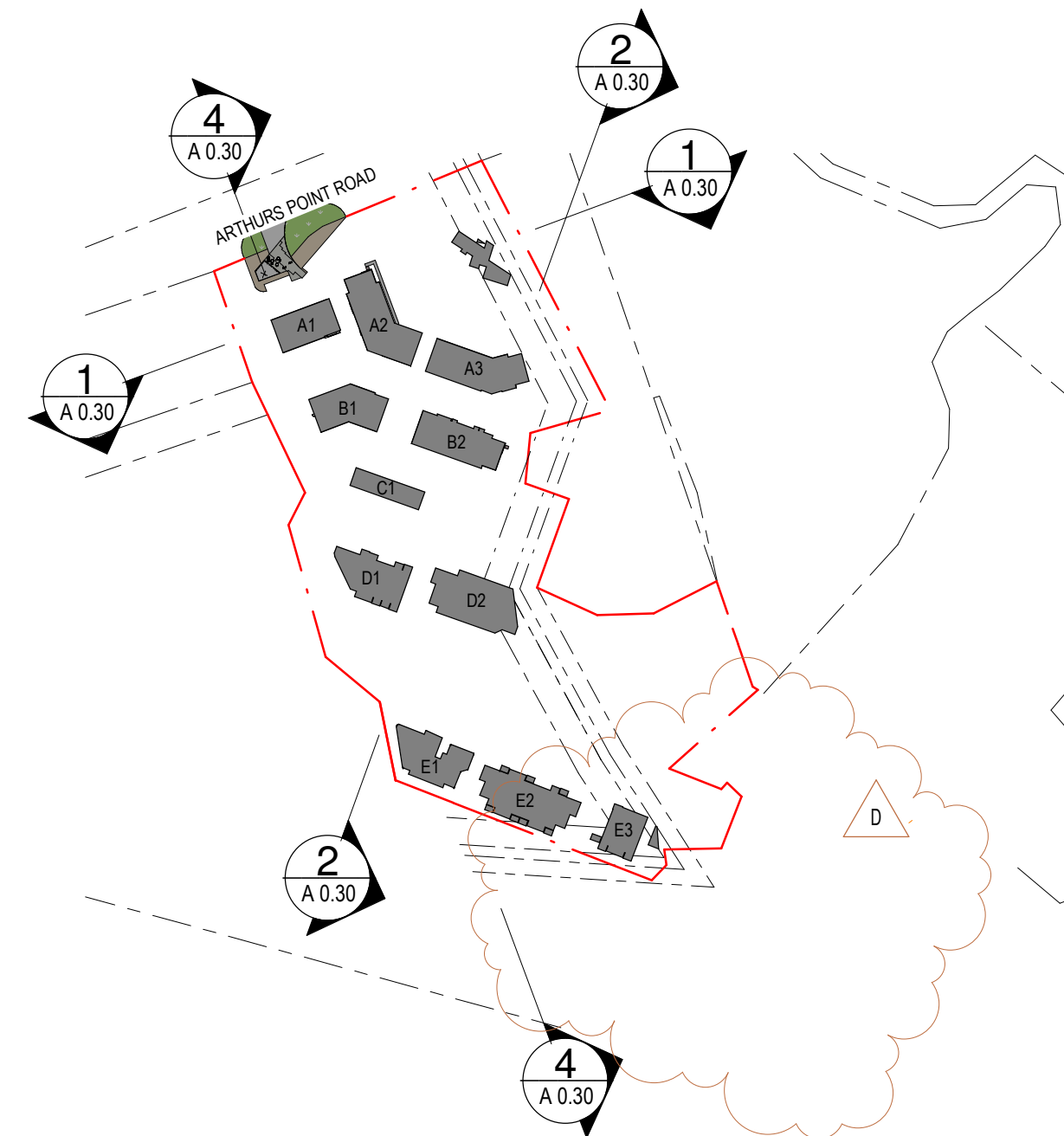
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QUEENSTOWN LAKES DISTRICT COUNCIL

APPROVED PLAN:
RM191333

7 August 2020



SECTION KEY PLAN

1:2500

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Revisions

A 22/11/19	FOR INFORMATION
B 29/11/19	PRELIM RESOURCE CONSENT
C 06/12/19	RESOURCE CONSENT
D 24/07/20	RC RFI

Notes

Consultants

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Project Title

ARTHUR'S POINT

182 Arthur's Point Road
Queenstown
Lot 1, 2&3, DP 300462
Lot 2, DP 24233

Drawing Title

SITE SECTIONS

Drawing Status

RESOURCE
CONSENT

Drawing Details

Scale	As indicated@ A1
Date	24/07/20
Job No	7755
Drawn	WAM
Checked	WAM

Drawing No

A 0.30

Revision

D

Revisions

A	22/11/19	FOR INFORMATION
B	29/11/19	PRELIM RESOURCE CONSENT
C	06/12/19	RESOURCE CONSENT

Notes

KEY

■	SITE IN GREEN
■	12M HEIGHT PLANE IN ORANGE
■	8M HEIGHT PLANE IN RED

Consultants

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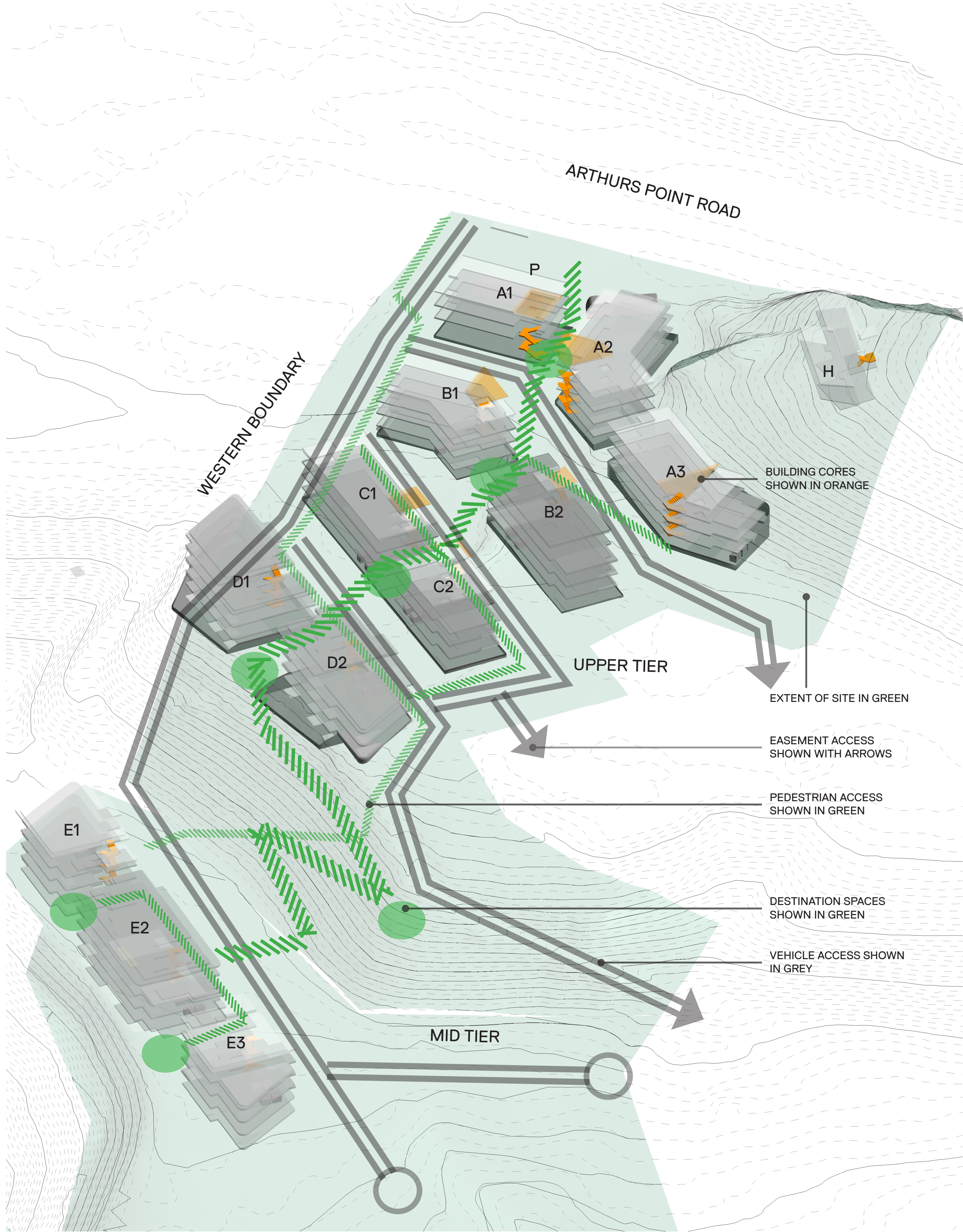
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Queenstown
Lot 1.2&3, DP 300462

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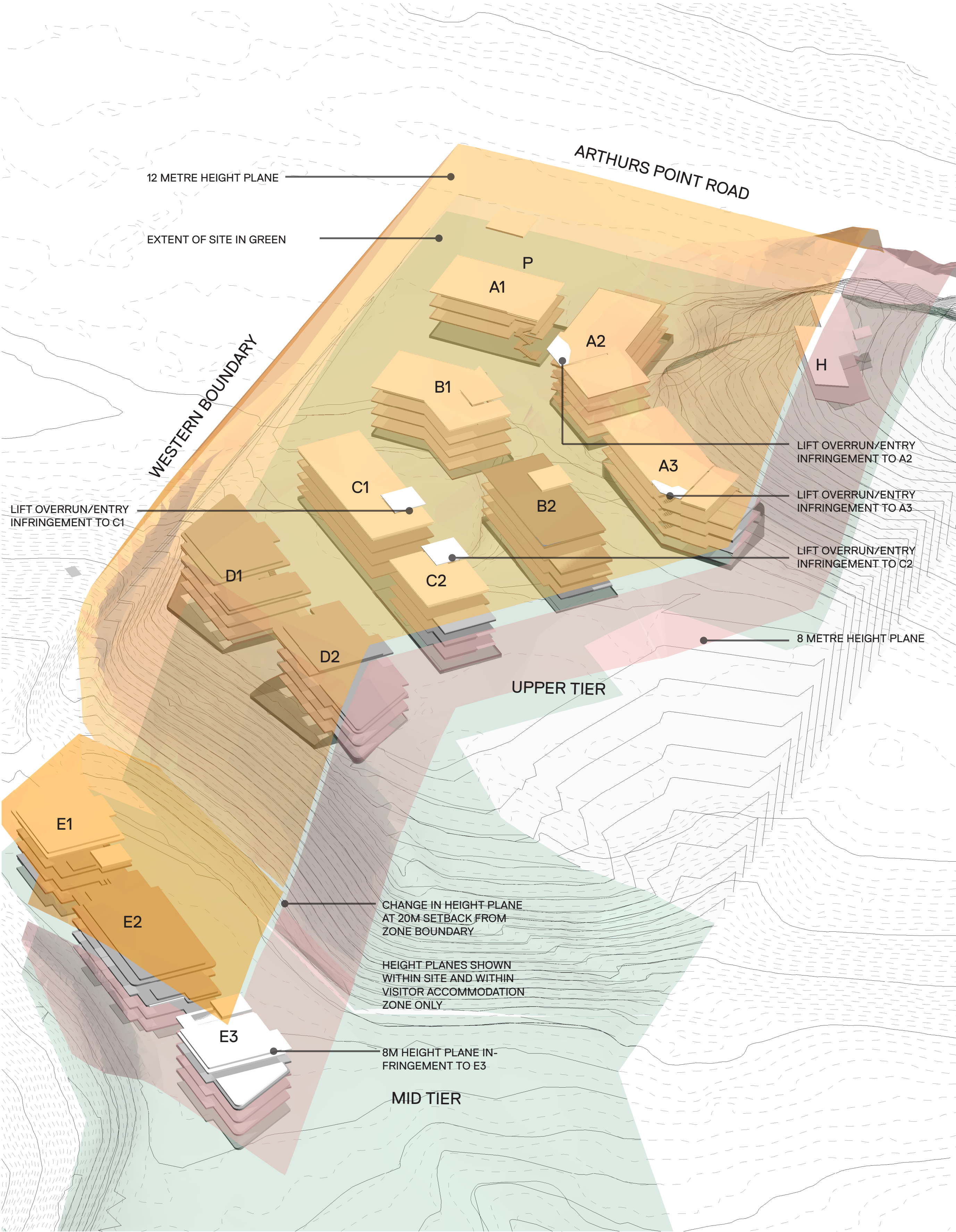
3D VIEWS

Drawing Status

RESOURCE
CONSENT



SITE DIAGRAM



HEIGHT PLANE DIAGRAM

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Revisions

A	22/11/19	FOR INFORMATION
B	29/11/19	PRELIM RESOURCE CONSENT
C	06/12/19	RESOURCE CONSENT

Notes

MATERIAL LEGEND

	NARROW, MULTI-TEXTURED HD FIBRE CEMENT PANELS
	HORIZONTALLY GROOVED GRC
	CLEAR GLAZING

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Project Title

7755 BUILDING E1

Enter address here

Drawing Title

ELEVATIONS

Drawing Status

RESOURCE
CONSENT

Drawing Details

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Job No	7755
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Checked	WAM

Drawing No

E1 2.01

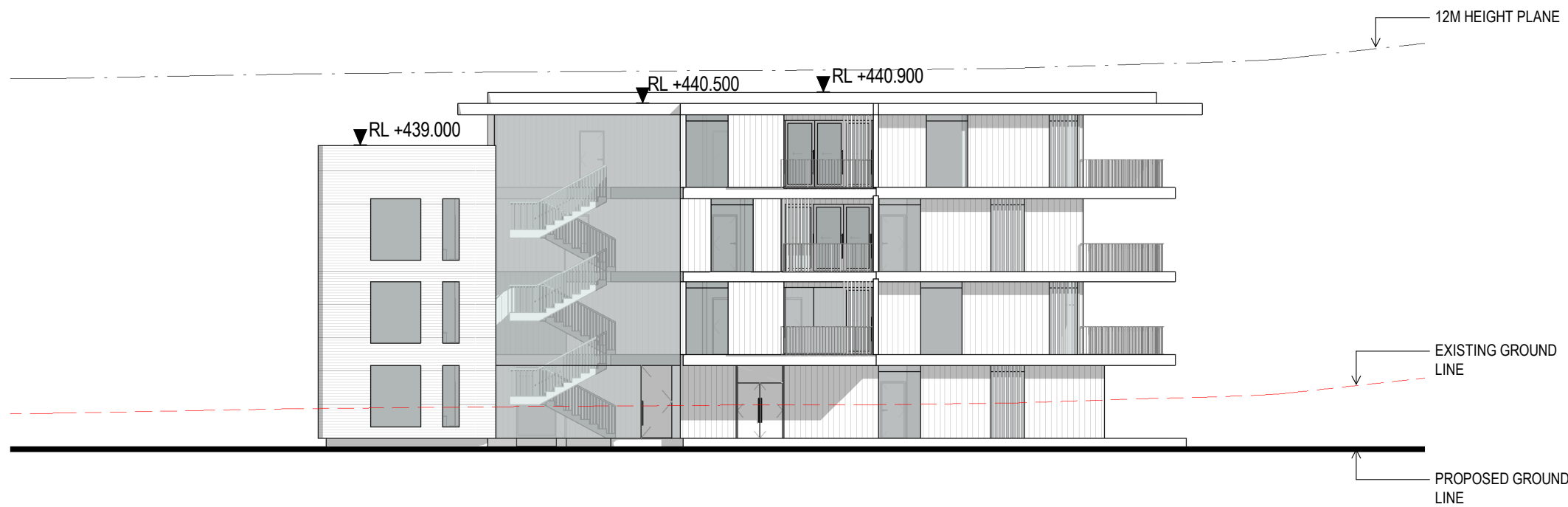
Revision

C

QUEENSTOWN LAKES DISTRICT COUNCIL

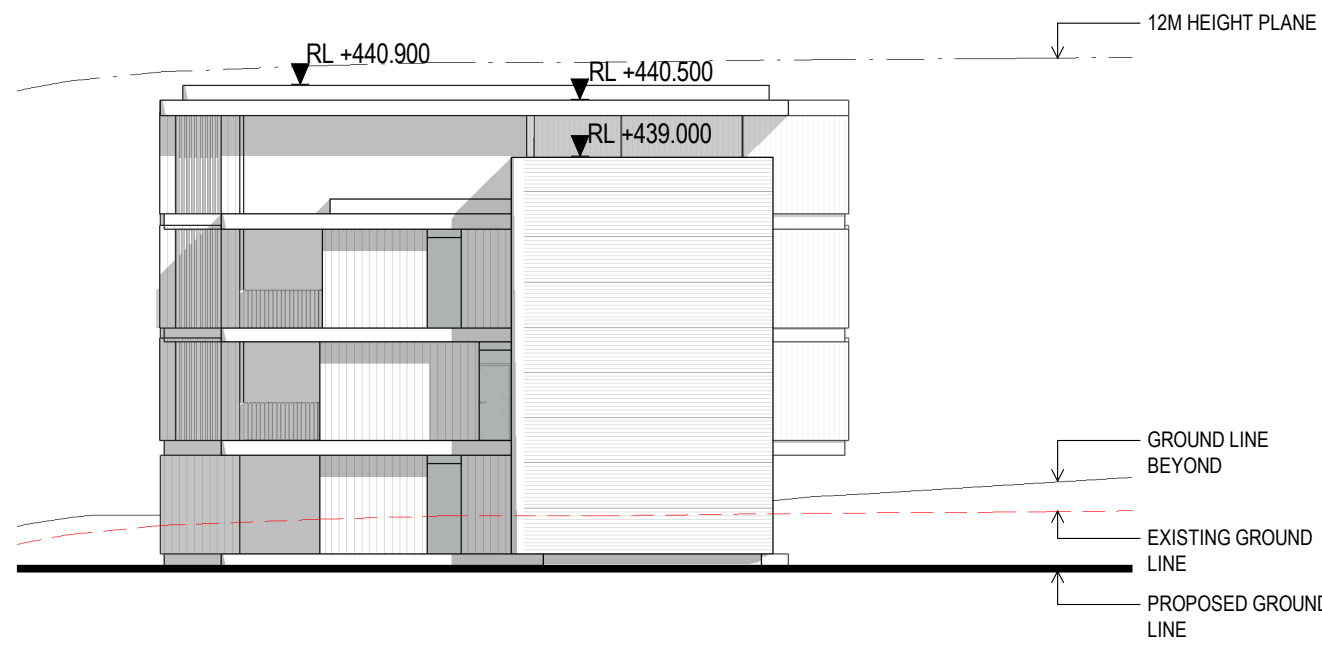
APPROVED PLAN:
RM191333

7 August 2020



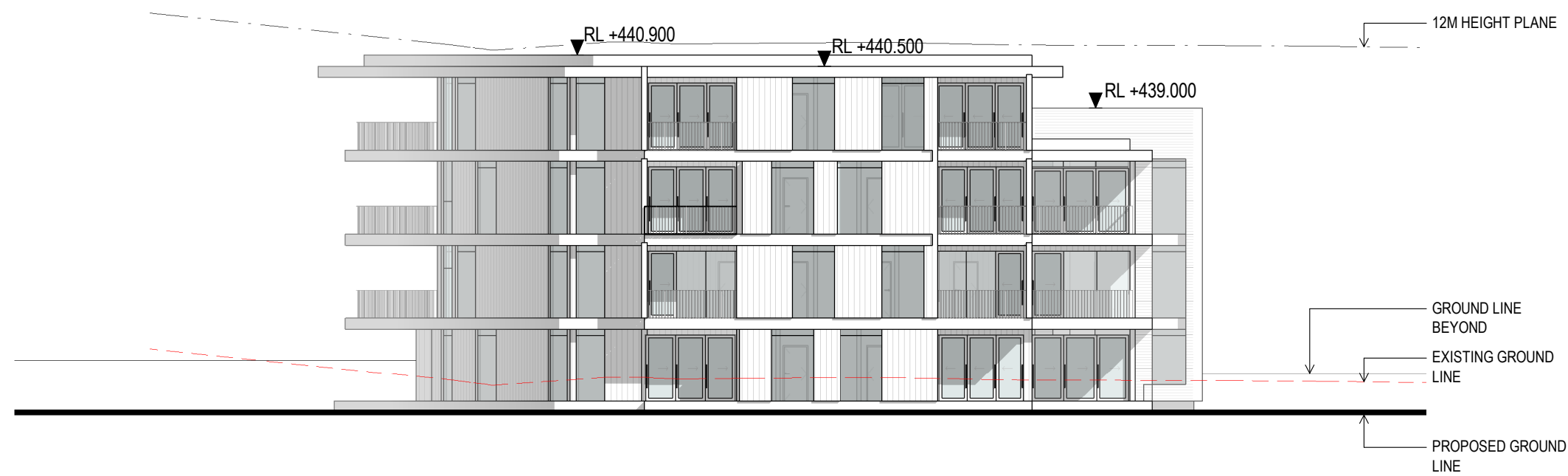
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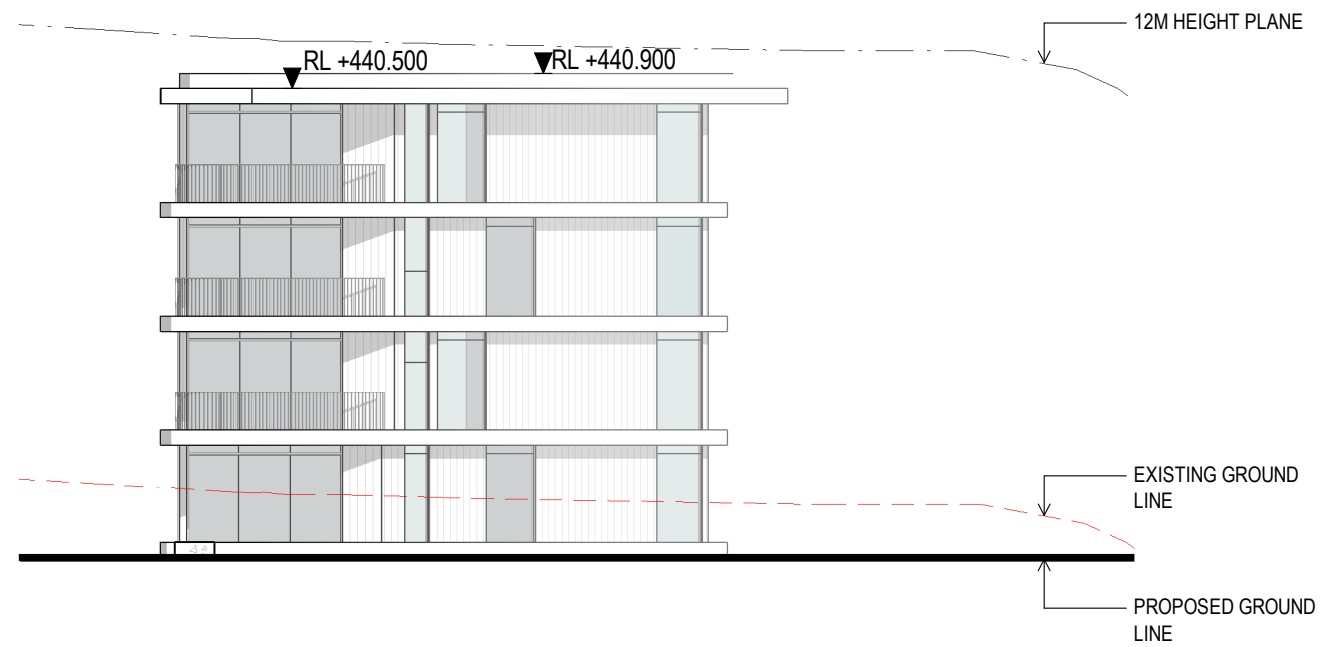
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ELEVATION - SOUTH

1 : 200



ELEVATION - WEST

1 : 200

**SUBMISSION ON QUEENSTOWN LAKES PROPOSED DISTRICT PLAN 2023 –
URBAN INTENSIFICATION VARIATION**

IN THE MATTER OF

Clause 6 of the First Schedule, The Resource
Management Act 1991 (**RMA** or **the Act**)

AND

IN THE MATTER OF

Further Submission on Urban Intensification
Variation

AND

IN THE MATTER OF

Amendment to the maximum building height
standards in the MDRZ and HDRZ at Arthurs
Point.

**VARIATION TO RULE 8.5.1.1(A)
EVIDENCE OF TONY DOUGLAS MILNE ON BEHALF OF ARTHURS POINT
TRUSTEES LIMITED (APT)**

Dated: 3 July 2025

INTRODUCTION

1. My full name is Tony Douglas Milne.
2. I am a Landscape Architect and Director of Rough Milne Mitchell Landscape Architects Limited, which is a Christchurch based consultancy established in 2010.
3. I hold a Bachelor of Arts degree from the University of Canterbury and a Bachelor of Landscape Architecture degree from Lincoln University. I am a Fellow and Registered Member of the New Zealand Institute of Landscape Architects (NZILA).
4. I have been practising as a landscape architect since 1995. Our consultancy is involved in a wide range of landscape design and land planning projects throughout New Zealand. Many projects have involved preparing reports and evidence, which address matters of visual impact and landscape effects concerning proposed developments. I have been involved with various projects for the Arthurs Point Trust (**APT** and or **the Submitter**) at 182 Arthurs Point Road since 2017 so am familiar with the Site.
5. I confirm I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2014 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

6. I've been asked to provide landscape evidence for APT in relation to its submission on the Urban Intensification Variation (**Variation**) to the Queenstown Lakes Proposed District Plan (**PDP**). Specifically, I address the Submitter's request that the District Plan mapping that applies to this Site be amended by removing any reference to the Mid-Terrace (*refer Figure 1 & 2*) of the Site as being affected by proposed Rule 8.5.5.1(a).

7. The focus of this short brief of evidence is on the potential adverse effects of an increased building height¹ on the Mid-Terrace on the landscape and visual amenity values identified for the adjacent Outstanding Natural Landscape (21.22.3 Kiriākau [Shotover River] PA: Schedule of Landscape Values).

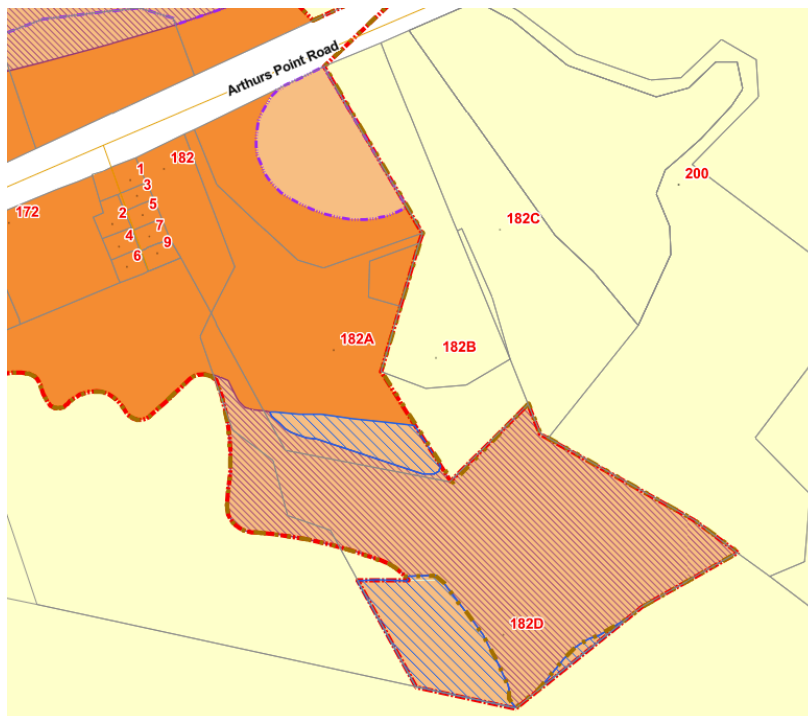


Figure 1: Notified UIV Zoning at 182 Arthurs Point Road, Arthurs Point.



Figure 2: The location of the Mid-Terrace at 182 Arthurs Point Road, Arthurs Point.

¹ The proposed Variation amends the Building Height rule in the MDR (8.5.1) by:
Providing a building height of 11m, together with an additional 1m for pitched roof articulation in all other MDR zoned sites
(8.5.1.1 (d))

8. In the course of preparing this landscape evidence, I have considered the following:

- i. National Policy Statement on Urban Development 2020 (**NPS-UD**).
- ii. The PDP, specifically Chapter 3 – Strategic Direction, 8 – Medium Density Residential Zone, 9 – High Density Residential.
- iii. PDP Urban Intensification Variation Section 42A Report and Council Expert Evidence, with consideration of three reports (see below) written by Morgan, Frischknecht and Wallace².
- iv. PDP Chapter 21 – 21.22.3 Kimiākau (Shotover River) PA: Schedule of Landscape Values³.
- v. The submission on the proposed Variation made by Mr John Edmonds, John Edmonds and Associates on behalf of APTL dated 18 February 2024.
- vi. The statement of evidence of Rachel Morgan, of UIV Section 42A Report (Rezoning Residential, 6 June 2025) relating to removing notified Rule 8.5.5.1(a) from the Mid Terrace at 182 Arthurs Point Road.
- vii. The statement of evidence of Corinne Frischknecht, of Section 42A Report (6 June 2025) relating to removing notified Rule 8.5.5.1(a) from the Mid Terrace at 182 Arthurs Point Road.
- viii. The statement of evidence of Cameron Wallace on behalf of QLDC relating to urban design (6 June 2025) and permitted building heights notified for the MDRZ in Rule 8.5.1 of the UIV.

² Queenstown Lakes District Council. (n.d.). Urban Intensification Variation. <https://www.qldc.govt.nz/your-council/district-plan/urban-intensification-variation/>

³ Queenstown Lakes District Council. (2025, April 11). 21-22-3 Kimiākau (Shotover River) PA Schedule of Landscape Values. [https://docs.isoplan.co.nz/pdfs/qldcProposed/1/11Apr2025/21-22-](https://docs.isoplan.co.nz/pdfs/qldcProposed/1/11Apr2025/21-22-3Kimiākau(ShotoverRiver)PAScheduleofLandscapeValues_294_11-Apr-2025.pdf)

[3Kimiākau\(ShotoverRiver\)PAScheduleofLandscapeValues_294_11-Apr-2025.pdf](https://docs.isoplan.co.nz/pdfs/qldcProposed/1/11Apr2025/21-22-3Kimiākau(ShotoverRiver)PAScheduleofLandscapeValues_294_11-Apr-2025.pdf)

METHODOLOGY

9. The methodology and terminology used in this evidence has been informed by the Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines⁴.
10. The table included in Figure 1 outlines the rating scales that are referred to in this report.

Very Low	Low	Low - Moderate	Moderate	Moderate - High	High	Very High
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Figure 1. The seven-point landscape and visual effects rating scale.⁵

EVIDENCE

Landscape Setting

11. The Submitter owns all land at 182 Arthurs Point Road (14.17 hectares) which is held in five Records of Title. The Property comprises three defined terraces of land that step down towards the Shotover River as shown in Figure 2 below.
12. The Mid-Terrace is zoned MDR with an 8m building height limit. A building restriction area along with an Outstanding Natural Feature and Landscape Priority Area overlay cover the south-west corner of this terrace.
13. The Mid-Terrace comprises approximately 2.5 hectares of flat land, roughly triangular (or boot) shaped and at a level of approximately 420asml. To the south-east this terrace then adjoins a steeply inclined slope (escarpment) – consisting of approximately 50 metres of elevation change falling to the lower terrace. Similarly, to the south-west this terrace then adjoins a steeply inclined slope (escarpment) – consisting of approximately 75 - 80 metres of elevation change falling to the Shotover River.
14. The Mid-Terrace of the Site and the landscape that surrounds it forms part of a greater river terrace formation descending towards the banks of the Shotover River. In brief, the landscape and amenity values are associated with the wider landscape setting where the scale and high legibility of the glacial and fluvial landforms convey high scenic, shared, and recognised values.

⁴ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022.

⁵ Ibid, p. 140.

15. Generally, the surrounding landscape can be described as rural and has a moderate-high level of natural character typically associated with low-moderate levels of human influence. The Mid-Terrace forms part of the general broadscale Shotover River corridor setting which has high biophysical values.
16. Much of the amenity is based on the wider setting, derived from views of the surrounding mountains and the proximity to the Shotover River. The scenic and open space value of the Site, coupled with intrinsic historic and cultural values attached to past use of the wider landscape setting and recreation values associated with the Shotover River, contribute overall to moderate - high landscape values and high visual amenity.
17. In the context of its surroundings, the Mid-Terrace area has a discrete location. Visually it is relatively isolated due the escarpment that separates it from the Upper Terrace, from elevated hill-forms to the east that extends further to the south, and the very limited views to the northwest and west. However, in the views available of the Mid-Terrace, it is seen in the same visual catchment as existing development associated with the northern node of Arthurs Point. The relatively enclosed position provides for a moderate capacity to absorb sensitively designed development.
18. The characteristics that promote the ability of the Mid-Terrace of the Site to absorb an increase in building height include:
 - a. The existing degree of modification or degree of departure from naturalness (landform, land cover, natural processes).
 - b. A complex landform which includes an abrupt change in topography.
 - c. Context and compatibility of the development with the landform (i.e., consistency with the settlement pattern and/or surrounding land use).
 - d. Limited visibility.
 - e. The Mid-Terrace is relatively visually enclosed.
19. The potential adverse effects of a higher building height (11m as compared to 8m⁶) on the Mid-Terrace have been considered in the context of the surrounding and adjacent ONL. In relation to landscape character and

⁶ Rule 8.5.5.1(a)

amenity values identified for the most adjacent ONL⁷, effects on the landscape values are largely avoided as the Mid-Terrace is considered to have lower landscape sensitivity.

20. While the Mid-Terrace topographically associates more with the Shotover River corridor, an increase of three metres (plus 1m gable) in building height will not give rise to any adverse building height-related effects and will also maintain the amenity and character values of the adjacent ONL.

Landscape Sensitivity and Absorption Capacity

21. Regarding the supporting objectives and policies of Chapter 9, relating to a positive contribution to the environment through urban design, and recognition of the maintenance of exiting amenity values, then an increase in height on the Mid-Terrace needs to be considered in the context of the sensitivity of the Shotover River corridor setting. The whole of the Shotover River escarpment, which forms the legible edge of the river as a feature, is sensitive to development which degrades its legibility and natural character. The steep escarpment that separates the middle and lower terrace is topographically a readily identifiable landscape element associated with the Shotover River.
22. As shown on the Photographs on **GA Sheets 5 – 8**, the escarpments are visible from the Shotover River, Big Beach and part of Arthurs Point Village. Within these photos, the Mid-Terrace, while identifiable, is more difficult to discern with its current vegetation cover.
23. Identification of landscape sensitivity, particular from these viewpoints is therefore a critical component in determining the appropriateness of the Mid-Terrace for an increase in building height.
24. The definition for landscape sensitivity is set out from the NZILA Best Practice Note: *Landscape sensitivity is the degree to which the character and values of a particular landscape are susceptible to the scale of external change.*⁸ Linked to landscape sensitivity is the concept of landscape capacity, defined as:

⁷ Queenstown Lakes District Council. (2025, April 11). 21-22-3 Kīmiākau (Shotover River) PA Schedule of Landscape Values.

³Kīmiākau(ShotoverRiver)PAScheduleofLandscapeValues_294_11-Apr-2025.pdf.

⁸ New Zealand Institute of Landscape Architects. (2021). Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment, p.59.

*Landscape capacity the amount of change the landscape can accommodate without substantially altering or compromising existing character and values.*⁹

25. Consents for a hotel and associated apartments have previously been granted for the property, and these have not lapsed. Therefore, this certainly gives indication that Council have previously considered the Mid-Terrace to have capacity to absorb development of a height greater than 8m (consented height is 12m).
26. It is considered that overall, the receiving environment of the Shotover River corridor has a moderate-high level of landscape sensitivity, particularly due to development which degrades its legibility and natural character. In my opinion, the Mid-Terrace has the capacity to absorb a higher building height due primarily to its overall lower visual significance.
27. In general terms from a landscape perspective, I support an increase in building height on the Mid-Terrace. However, to adequately protect the values of the Shotover PA, I recommend bespoke provisions for the Mid-Terrace, including staggering building height limits adjacent to the lip of the escarpment to ensure built form appropriately considers the identified landscape values of the Shotover River PA.
28. Effects on visual amenity have been considered in the context of readily accessed public viewing places, the Shotover River corridor (including Big Beach) and the wider Arthurs Point settlement. For the most part, a three-metre increase in building on the Mid-Terrace will be visually compatible and cohesive within the evolving built form of Arthurs Point.
29. Available views are intermittent, distant, and limited, and the Mid-Terrace is viewed against a wider landscape backdrop. An increase in building height on the Mid-Terrace of the Site will not inappropriately dominate the Site or detract from rural landscape views for travellers using Arthurs Point Road.

⁹ Ibid, p. 60.



Figure 3. The location of the 'terraces' at 182 Arthurs Point Road, Arthurs Point.¹⁰

Relevant Planning Provisions

30. The proposed building height variation is generally consistent with the objectives and policies of Chapter 8 and 9 of the PDP. It supports urban consolidation and efficient land use, while incorporating design responses to maintain amenity and landscape values.

PDP Chapter 21 – 21.22.3 Kimiākau (Shotover River) PA: Schedule of Landscape Values¹¹

31. Chapter 21.22.3 identifies the Kimiākau PA Landscape Values to be very high¹², with strong legibility and perception of naturalness requiring protection from inappropriate development, particularly in terms of scale and height. The Kimiākau PA includes steep escarpments, river terraces, and upper edges of prominent landforms. These features contribute to the visual containment and character of Arthurs Point and the Shotover River corridor.
32. The area is recognised for its high visual amenity, with dynamic river forms, native vegetation, and dramatic landform transitions. Any increase in building height could potentially compromise views to or from these valued features, especially if visible from public viewpoints or the river corridor. Furthermore perceptual and associative values could be adversely affected.

¹⁰ Morgan, R. G. (2025, June 6). Section 42A report: Rezoning residential – Urban Intensification Variation. Queenstown Lakes District Council, p. 37.

¹¹ Queenstown Lakes District Council. (2025, April 11). 21-22-3 Kimiākau (Shotover River) PA Schedule of Landscape Values.

¹² Kimiākau(ShotoverRiver)PAScheduleofLandscapeValues_294_11-Apr-2025.pdf.

¹² Ibid.

33. Overall, the schedule outlines that development should maintain or enhance the identified landscape values:

From the bridges and more elevated locations within the corridor, there is an awareness of the urban or rural living land use adjacent the corridor [...]

Buildings tend to be glimpsed behind plantings making them recessive, with the historic character of some contributing to the charm of the area.¹³

At a finer scale, the following aspects contribute to the aesthetic appeal: the visually discreet character of the majority of built development bordering the area,¹⁴

34. Therefore, the proposal must demonstrate that it does not adversely affect the landscape character, visual coherence, or natural features of the PA. For the most part, I am satisfied a three-metre increase in building height on the Mid-Terrace will achieve this. However, this is subject to recommended provisions (see later in this evidence) for stepping building heights adjacent to the escarpment edge to ensure built form appropriately responds to the identified landscape values of the Shotover River PA.

Matters Raised in Section 42a Report and Submissions

35. Having reviewed the Section 42A Report and those submissions relating to the Site, I am satisfied that matters raised relating to landscape and visual amenity matters have been generally addressed in the body of my evidence above.
36. There are three reports associated with notified rule 8.5.5.1(a) of particular note, that I will respond to below.

Rachel Morgan

37. *The mid-terrace is less proximate to Arthurs Point Road and as noted above, Arthurs Point as a whole, has low accessibility relative to other parts of Queenstown. Having said that, I acknowledge the potential that the site offers for comprehensive development, and I would consider any evidence put forward by the submitter on this matter.¹⁵*

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Morgan, R. (2025, June 6). Section 42A Report – Rezoning Residential: Urban Intensification Variation. Queenstown Lakes District Council, p. 38.

38. *It should also address potential effects on the landscape values of the Kimiākau (Shotover River) Landscape Priority Area, of which the south-western corner of the site forms a part of.*¹⁶ Refer to Figure 4 below.

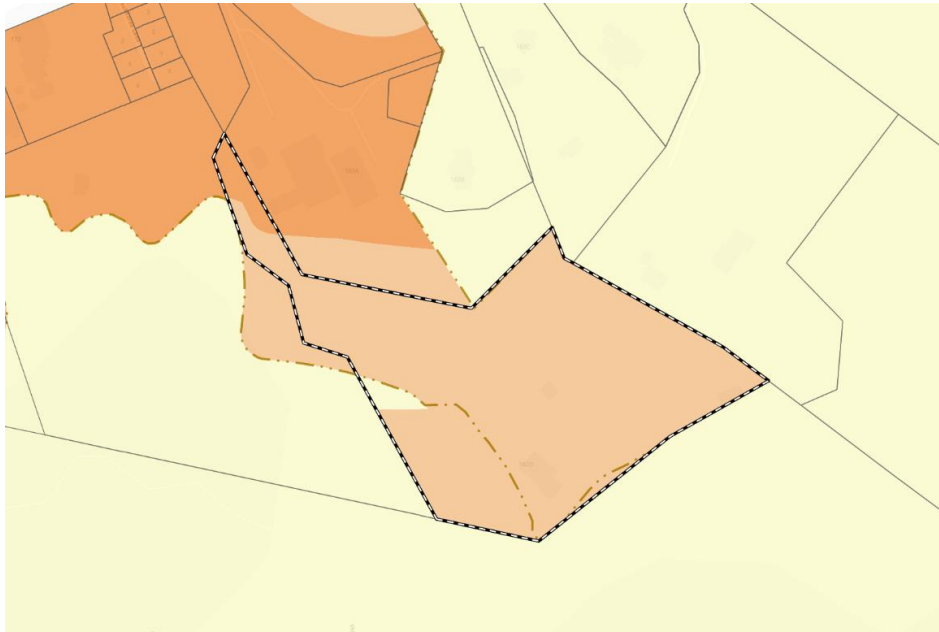


Figure 4 – Kimiākau (Shotover River) Landscape Priority Area (PA) Landscape Classification overlay. PDP Maps with classification overlay.

39. The statement of evidence of Ms Morgan suggests an increase in building height on the Mid-Terrace of the Site is potentially acceptable, if effects on the landscape values of the PA can be managed.
40. As stated, it is my opinion that the Mid- Terrace has the capacity to absorb change in building height that is visually compatible and cohesive within the overall Site. Available views are intermittent, distant, and limited, and the Mid-Terrace is viewed against a wider landscape backdrop.
41. Although there will be greater visual prominence (assessed as being slight) if height limits were increased to 11 + 1m, the potential for rooflines to be gabled allows built form to have better design with alpine character. The Mid-Terrace is already zoned (and with consented development) with the capacity to absorb change, and ultimately any adverse effects on the PA have been considered to be acceptable.

¹⁶ Ibid.

42. The potential adverse effects on the Kimiākau/Shotover PA are considered to be **low** at most reducing to **very low** by a stepped approach to building heights in the vicinity of the PA (essentially the edge of the Mid-Terrace, top of the escarpment). It is my recommendation that to prevent negative effects on the PA, that maximum building height is maintained at 8m along the southern edge of the Mid – Terrace, crest of the escarpment (deemed most susceptible to visual prominence), within a 10m setback measured from the top of the escarpment. Beyond this a maximum build height of 11m + 1m is considered acceptable for the balance of the Mid-Terrace. Consideration has also been given to the existing BRA's that will remain in place.

Corinne Frischknecht

43. *Apartment buildings previously approved under RM191333 within the area subject to notified Rule 8.5.1.1a are 12m-plus high so have already breached the 8m height limit and were considered appropriate to do so from a landscape perspective. As part of this consent, a detailed planting plan was required to ensure the integration of the proposed development into the Arthurs Point context and to mitigate any adverse effects.*¹⁷
44. *Whilst I acknowledge that building heights have been exceeded in portions of the Arthurs Point Trustees Limited site, I do not think it is appropriate to remove this site from being subject to notified Rule 8.5.5.1a as this would provide a blanket height for the entire site without the opportunity for consideration of design that is provided for by notified Rule 8.5.1. I consider that an assessment as to whether greater heights at this location is appropriate should continue to be assessed on its merits through a resource consent process to ensure that it is appropriate given its location near an ONL.*¹⁸
45. To summarise, Ms Frischknecht's concern with removing Rule 8.5.5.1(a) is the concern with a blanket height rule across the entire Site of 182 Arthurs Point, particularly in areas of high visibility near the crest of the terraced landform, leading to adverse visual and landscape effects.
46. As mentioned above [42]; to avoid unacceptable adverse effects on the Kimiākau/Shotover PA, a building height setback is proposed for the Mid-

¹⁷ Frischknecht, C. (2025, June 6). Section 42A Report – Chapters 8 & 9 and Lake Hāwea Residential Zones: Urban Intensification Variation. Queenstown Lakes District Council, p. 35.

¹⁸ Ibid.

Terrace. Further to this, and as alluded to above, RM191333 approved buildings exceeding 8m in height within the same area subject to Rule 8.5.5.1(a). These buildings were considered appropriate from a landscape perspective due to:

- Their location in the northern part of the Site, away from the ONL.
 - The inclusion of a detailed planting plan to integrate the development into the Arthurs Point context.
 - Conditions requiring Council review of final design materials to ensure visual coherence.
47. This precedent supports the view that increased building heights can be appropriate when accompanied by robust landscape and design mitigation and strategic setback from visually prominent areas including the edge of the Kimiākau/Shotover PA on the Mid-Terrace.
48. The proposed stepped height strategy provides a Site-responsive solution that balances urban intensification objectives with landscape protection. It avoids a blanket height provision and retains the ability to manage visual effects through design controls and landscape integration.

Cameron Wallace

49. *With regard to the 11m (+1m) permitted heights notified for the MDRZ in Rule 8.5.1 of the UIV, this is consistent with the approach taken in a number of existing district plans across New Zealand, 13 and enables building typologies typically classed as "medium density housing". I also note that this height is consistent with the Medium Density Residential Standards (MDRS) which sets out the basic bulk and scale controls which relate to medium density developments¹⁹*
50. *The 11m height limit (+1m for gabled roof forms) comfortably enables the development of up to three-storeys with generous internal dimensions on a range of different sites. It also provides flexibility to allow for the accommodation of topographical change²⁰*

¹⁹ Wallace, C. (2025, June 6). Statement of Evidence – Urban Design: Urban Intensification Variation. Queenstown Lakes District Council, p. 17-18.

²⁰ Ibid

51. *A reduction in the proposed permitted building height would, in my opinion, unnecessarily reduce design flexibility and would undermine the delivery of common three-storey medium density typologies including narrower terraced houses and walk-up apartments. It could also encourage a proliferation of flat roofs and lower height internal spaces to ensure compliance with a lower height which would unnecessarily result in poorer urban design outcomes in terms of the townscape and internal amenity for future residents.*²¹
52. From Mr Wallace's statement, it can be determined that an appropriate building height for a MDRZ is 11m (+1 for gabled roof forms), which will ultimately see a better design with an alpine character with the incorporation of gable roof forms that help integrate proposed buildings with the existing topography of the surrounding environment, alongside a natural palette of materials and a strong native plant planting design derived from the surrounding landscape to nestle the proposal into the landscape.
53. I am confident the resulting architectural design of future buildings to a height of 11m + 1m on the Mid-Terrace, although higher than that currently enabled, will respect the landscape attributes of the locality and in particular the Kimiākau/Shotover PA. Therefore, it is my opinion that rule 8.5.1.1 (d) should apply to the Mid-Terrace of the Site.
54. The potential increase in height of the built form will be effectively absorbed by the scale and bulk of the surrounding landforms. Furthermore, the future consenting pathway ensures building materials coupled with landscape requirements will reflect the local vernacular.

CONCLUSION

55. The landscape and visual amenity values of the receiving environment are mainly contributed by the factors external to the Site such as, the surrounding landforms that are large in scale, with high natural character, and highly legible and expressive of their fluvial and glacial evolution.
56. The landform of the Mid - Terrace, coupled with very few clear views towards the Site (overall), means an increase in building height on the Mid-Terrace will be difficult to discern. This ensures the protection of existing landscape values and visual amenity.

²¹ Ibid.

57. Landscape sensitivity and visual influence of the Site have been assessed and have informed this evidence. The Mid-Terrace is an area of lower sensitivity and less visibility with landscape attributes that can absorb development of an increase in building height of 3 + 1m.
58. The additional height of development on the Mid-Terrace will not be visually prominent such that it detracts from public or private views of and within Outstanding Natural Features and Landscapes. It is considered that future built form of an 11m + 1m height, in combination with the proposed height step back rule, on the Mid-Terrace will only result in a **very low** degree of adverse effects on the landscape values of the Kimiākau/Shotover PA.

Tony Milne

3 July 2025

A handwritten signature in black ink, appearing to be 'Tony Milne', with a stylized, flowing script.



Arthurs Point Land Trust - Arthurs Point, Queenstown Graphic Attachment to Evidence on Variation to Rule 8.5.5.1(a) QLDC PDP

APT seeks that the District Plan mapping that applies to this site be amended by removing any reference to the Mid Terrace as being affected by proposed Rule 8.5.5.1 (a).

03 July 2025

Document Information

Project
Height Rule Submission Amendment to Rule 8.5.5.1 (a)
Address
Arthurs Point, Queenstown
Client
Arthurs Point Land Trust
Document
Graphic Attachment for Submission
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For Submission
Revision
0
Prepared By
Rough Milne Mitchell Landscape Architects Ltd
Project Number: 25114
Author: Tony Milne and Lorien Kaack
Peer Reviewed: Paul Smith

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Contents

Landscape Context Plans	Page
Context Plan	03
Site Plan	
Middle Terrace with associated BRAs	04
Viewpoint Photographs	
Viewpoint Location Plan	05
Viewpoint Location Photographs	06 - 08

Context Plan

Legend

The Site



Scale 1:10,000
Data Source: qldc.maps.acrgis.com



Middle Terrace and existing BRA's

Legend

The Site

'Middle Terrace'

Building Restriction Area (BRA)

This figure is an aerial map showing the 'Middle Terrace' area and existing Building Restriction Areas (BRA's). The map includes a legend in the top left corner and a scale indicator in the bottom left corner. The legend defines three categories: 'The Site' (yellow outline), 'Middle Terrace' (teal fill), and 'Building Restriction Area (BRA)' (blue hatched fill). The map shows the 'Middle Terrace' area, which is a large, irregularly shaped area with a teal fill. Two smaller areas, labeled 'BRA', are shown within the 'Middle Terrace' area, each with a blue hatched fill. The map also shows the 'Site Boundary' (yellow outline) and 'Arthurs Point Rd' (a road running horizontally across the top). The map is overlaid with a grid of contour lines, indicating elevation. The map is titled 'Middle Terrace and existing BRA's'.

1:1500 A3
Data Source: qldc.maps.arcgis.com

RMM

Zoning Appeal Arthurs Point, Queenstown

04

Viewpoint Location Plan

Legend

The Site

1

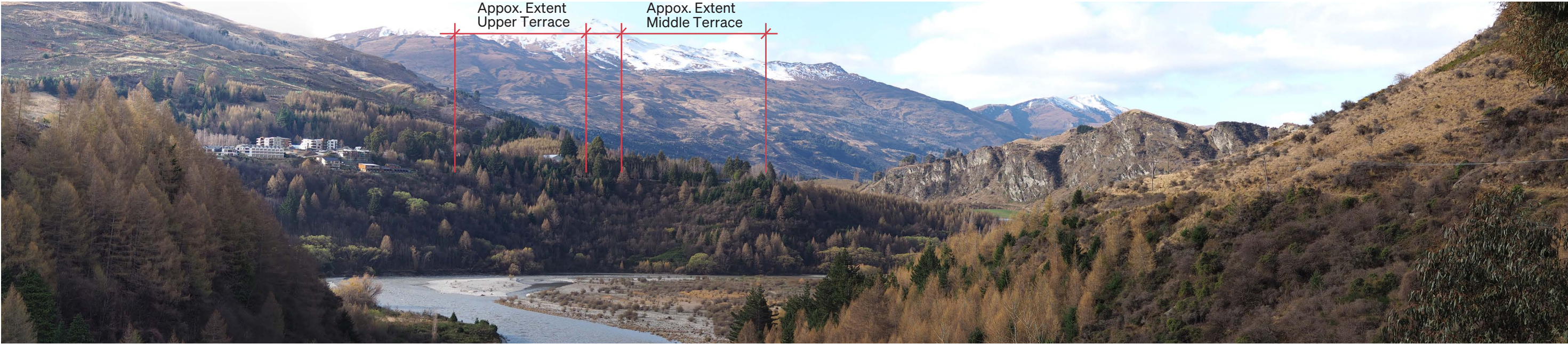
Viewpoint Location Photographs



Not to Scale

Data Source: qldc.maps.arcgis.com

Viewpoint Location Photographs

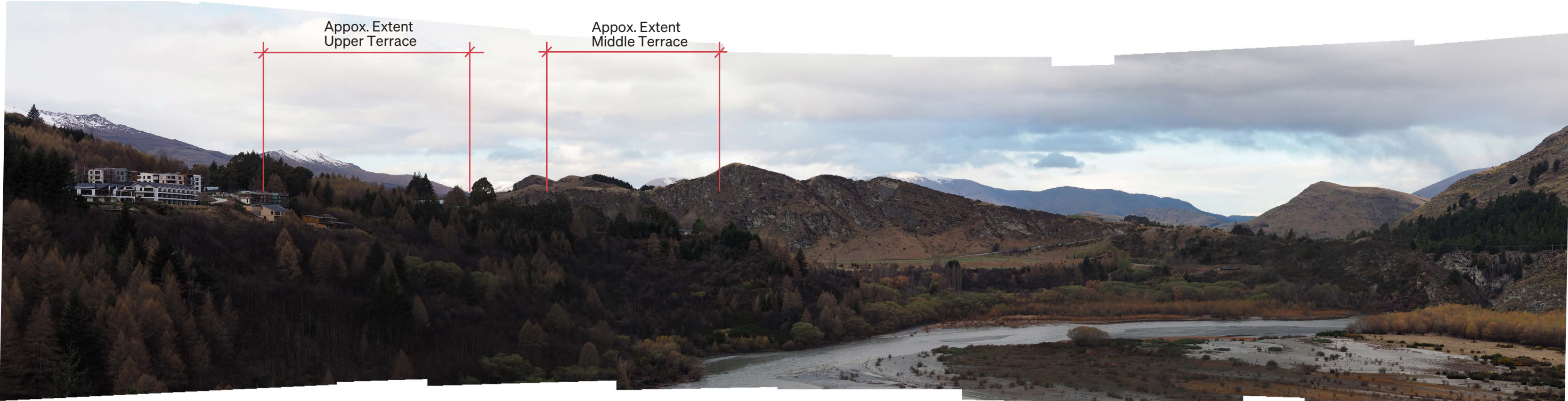


Viewpoint Location Photograph 1: View from Watties Track.



Viewpoint Location Photograph 2: View from track left bank of Shotover River

Viewpoint Location Photographs

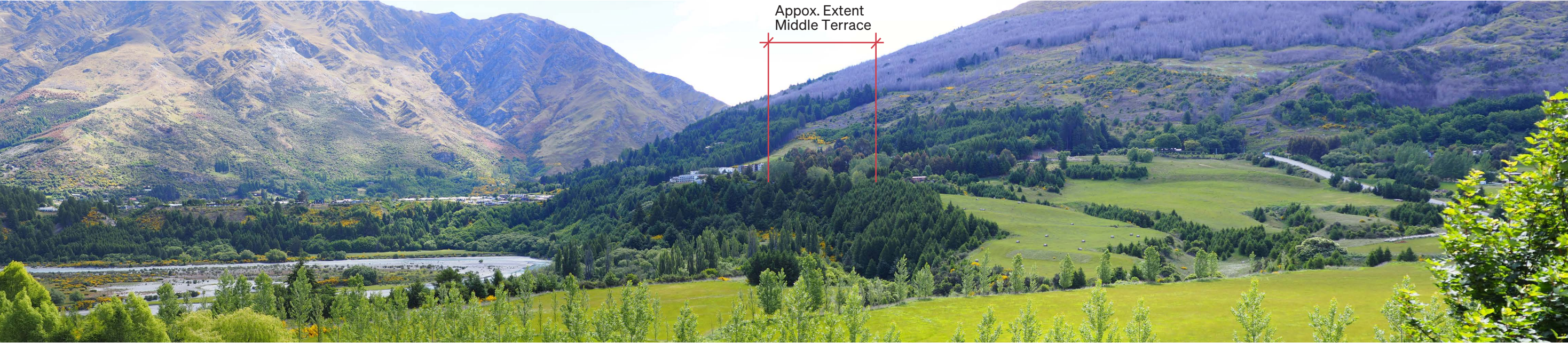


Viewpoint Location Photograph 3: View from terrace off Atley Road.

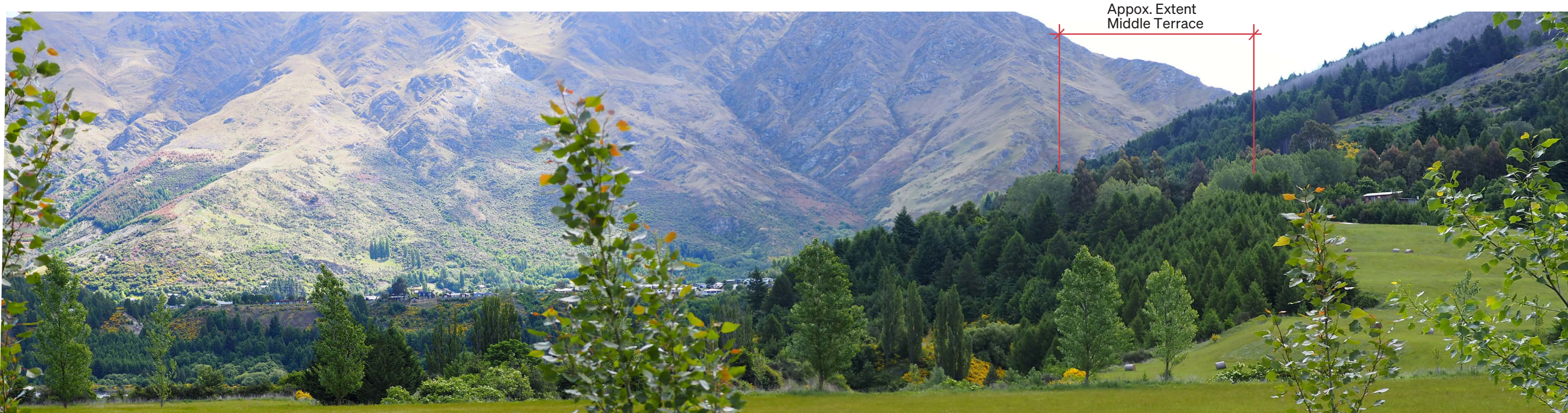


Viewpoint Location Photograph 4: View from recreation area (private land).

Viewpoint Location Photographs



Viewpoint Location Photograph 5: View from Little Road (upper part adjacent to bend in road).



Viewpoint Location Photograph 6: View from Little Road.

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