

**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 3
(Protected Trees
chapter 32)

**STATEMENT OF EVIDENCE OF PHILIP RONALD BLAKELY ON BEHALF OF
QUEENSTOWN LAKES DISTRICT COUNCIL**

CHARACTER TREES

1 June 2016

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Appendix B – Photos of Items 6 and 34 contained within 32.7 Schedule of Character Trees.

1. INTRODUCTION

- 1.1 My full name is Philip Ronald Blakely. I am a Landscape Architect and a partner of Blakely Wallace Associates. My partners and I established Blakely Wallace Associates in 1997 and we have been based in Arrowtown since that time. I have over 30 years' experience in landscape architecture including design, landscape management and assessment. I hold a Bachelor of Applied Science in Landscape Architecture (Distinction) and am a Registered Member of the New Zealand Institute of Landscape Architects.
- 1.2 I have lived in or near Arrowtown for 30 years. I have been involved in planning and design in Arrowtown for a similar period. I was a member of the design team for both the 1994 and 2003 Planning Charrettes for Arrowtown. In 2006, our firm prepared the Arrowtown Design Guidelines and I was a lead consultant on that project.
- 1.3 I am a member of the Arrowtown Planning Advisory Group (**APAG**) which assesses all resource consent applications in the Arrowtown Residential Historic Management Zone (**ARHMZ**). Until the enactment of sections 76(4A) – 764(D) of the Resource Management Act 1991 (**RMA**), APAG also assessed all applications for tree removal and trimming in the ARHMZ and made recommendations to the Queenstown Lakes District Council (**Council**).
- 1.4 In 2014, I was engaged by the Council to identify and assess trees and hedges within the ARHMZ that I considered appropriate to be classified as character trees.
- 1.5 I have now been engaged by the Council to provide evidence in relation to Chapter 32, Protected Trees contained in the Proposed District Plan (**PDP**).
- 1.6 Although this is a Council hearing, 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.

1.7 The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:

- (a) Chapter 32 Protected Trees as notified;
- (b) Section 32 report for Chapter 32 Protected Trees; and
- (c) Schedule of recommended character trees provided by me to the Council in 2014, prior to notification of the PDP.

1.8 I undertook site visits from the street to inform my initial assessment in October 2014. I carried out further site visits in April 2016 at 16-18 Wiltshire Street and 24 Anglesea Streets to inform this statement of evidence.

1.9 I have attached to this evidence:

- (a) **Appendix A** - the Schedule of recommended character trees, that I provided to the Council in 2014, prior to notification of the PDP; and
- (b) **Appendix B** – Photos of Items 6 and 34 contained within 32.7 Schedule of Character Trees.

2. SCOPE

2.1 My evidence covers the following matters:

- (a) an explanation of the methodology that I used in preparing my 2014 recommendation to the Council; and
- (b) response to submissions regarding items 6 and 34 in the Schedule of Character Trees contained within 32.7 of the PDP.

3. EXECUTIVE SUMMARY

3.1 The key conclusions in my evidence are that:

- (a) the character trees that have been identified and included in the PDP have been robustly assessed and evaluated;
- (b) items 6 and 34 have been correctly identified as character trees and given protected status on account of their contribution to the character, amenity and heritage values of the ARHMZ; and

- (c) no sound basis has been identified upon which the Council should reconsider the protective status of these trees.

4. BACKGROUND

4.1 It is my understanding that as a result of section 76(4A) – 764(D) of the Resource Management Act 1991 (**RMA**), any tree, group of trees or hedge contained within an urban environment allotment that the Council wishes to be protected must be identified and noted in a schedule to the PDP. There are individual trees, groups of trees and hedges within the ARHMZ that contribute to the character, amenity, and historical status of Arrowtown. It is the Council's intention to provide for the protection of such trees as character trees in the PDP.

4.2 In October 2014 I was engaged by the Council to undertake an assessment to identify the trees within the ARHMZ that in my opinion should be protected as character trees. As mentioned, the output of that work is attached as **Appendix A** to this evidence.

5. CHARACTER TREES - METHODOLOGY FOR IDENTIFICATION IN PDP

5.1 The purpose of my 2014 assessment was to identify trees, groups of trees and hedges in the ARHMZ¹ that contribute to the historic character and amenity of the zone. The brief that I was provided was based on the following objective and terms of reference.

5.2 Project Objective:

- (a) to identify 'character trees' in the ARHMZ including the location (street address) of the trees, and rationale for their inclusion in the PDP as a protected item.

5.3 Terms of reference:

- (a) identify trees, groups of trees and hedges located on urban environment allotments that are important in terms of the ARHMZ character, and amenity, or history, or a combination of some or all of these criteria;

¹ The ARHMZ in the operative plan, covers the same area as in the PDP.

- (b) the survey area is the ARHMZ;
- (c) groups of trees may be located on more than one allotment. However, the allotments must be adjacent to each other;
- (d) where part of a group of trees identified in the survey is also located on a road, the trees on the road may be identified in the survey; and
- (e) the survey is intended to assist with the identification and scheduling of trees in the manner required by sections 76(4A) - (4D) of the RMA.

5.4 The methodology that I followed was to systematically survey each street in the ARHMZ and to identify trees, groups of trees and hedges, primarily within private allotments, that contribute to the historic character and amenity of the zone. I marked any vegetation that I considered appropriate to be protected on an aerial photograph and cross referenced the details in the schedule attached at **Appendix A**, using street numbers.

5.5 I used the following assessment criteria to determine whether the vegetation that I assessed had special character values:

- (a) the contribution the individual trees, groups of trees or hedges made to the character and amenity of the streetscape and wider environment;
- (b) whether the vegetation contributed to heritage values; and
- (c) the age of the vegetation and if it was typical and/or representative of early plantings in Arrowtown.

5.6 The result of my 2014 assessment was that I identified the trees contained in the schedule at **Appendix A** of this evidence as contributing to the historic character and amenity of the ARHMZ and being worthy of formal protection.

5.7 I consider that the methodology that I followed in carrying out my assessment was best practice for the purpose. It was specifically tailored to my extensive knowledge and understanding of Arrowtown and the elements that contribute to its historic character and amenity.

6. RESPONSE TO SITE SPECIFIC SUBMISSION POINTS

32.7 – Character Tree Number 6

6.1 The Spruce Grove Trust (Submission 560) has requested the removal of item number 6 from the Schedule of Character Trees contained within 32.7 of the notified chapter. Item 6 is a Hawthorne hedge (*Crataegus monogyna*) on Lot 1 DP 23743.

6.2 The Hawthorne hedge is located on Wiltshire Street, immediately above the Town Centre.

6.3 Using the assessment criteria referred to in paragraph [5.5] to assess the hedge I comment as follows:

(a) *The contribution the individual hedge makes to the character and amenity of the streetscape and wider environment:*

Hedges are a key element/feature of streetscape and contribute to amenity and heritage value. I identified most of the hedges in the ARHMZ as worthy of protection as 'character trees'. Hawthorne is probably the most common hedge type in the zone.

Hedges provide living walls. They are soft and simple in appearance and reduce the dominance of buildings and other structures. They also provide cohesion to the street.

(b) *Whether the vegetation contributes to heritage values:*

This Hawthorne hedge dates back to early plantings in Arrowtown. It contributes to heritage values in the immediate Wiltshire Street environs and in the ARHMZ as a whole. Hedges were typical features in front of cottages demarcating the boundary between the street and private property in early Arrowtown.

(c) *The age of the vegetation and if it is vegetation that is typical/representative of early plantings in Arrowtown.*

The hedge is very old and dates from early plantings within the HRHMZ. It is approximately 2.0m high and is a dominant feature in upper Wiltshire Street. As discussed above, Hawthorn hedges are highly representative and typical of early plantings in Arrowtown.

- 6.4** The reason given in the submission of Spruce Grove Trust to remove the status of the Hawthorne hedge as a character tree is that the protection of the hedge will provide undue limitations to the site. I am not qualified to comment on this matter. However, I can confirm that this hedge contributes to both immediate Wiltshire Street streetscape amenity and heritage values, as well the ARHMZ as a whole. Accordingly, it contributes to the zone's unique character and the appeal of the zone to residents and visitors. It is important to recognise that heritage and amenity values in an area are often built on a collection of individual features or elements. The loss of an individual feature or element can degrade the character of an entire street and affect the values of a zone as a whole. It is my opinion that the removal of the hedge on the boundary of 16 Wiltshire Street, Arrowtown will degrade the character of the immediate Wiltshire Street environs and to some extent the ARHMZ as a whole.
- 6.5** Given the significance and importance of hedges (including Hawthorne hedges) to the historic character and amenity of the HRHMZ, it is my opinion that there is no adequate justification or reason for the Council to reconsider protective status of this hedge.

32.7 – Character Tree 34

- 6.6** Mr Alan Stewart (submission 49) has requested the removal of item 34 from the Schedule of Character Trees in 32.7 of the notified chapter. Item 34 is a group of trees consisting of a Copper Beech (*Fagus sylvatica 'Purpurea'*) and a Walnut (*Juglans regia*) tree. Both are located on Lot 4 DP 7794 of which Mr Alan and Mrs Judith Stewart are registered proprietors. Mr Stewart did not include any reasons with his submission.
- 6.7** The two trees are located near the intersection between Angelsea Street and Merioneth Street. Lot 4 DP 7794 is a large lot and both trees are located on the Merioneth frontage. I estimate that both trees were planted at about the

same time and are not fully grown (the ultimate size attained by these trees varies in Arrowtown).

6.8 Using the assessment criteria referred to in paragraph [5.5] to assess the Copper Beech and Walnut trees, I comment as follows:

(a) *The contribution the group of trees makes to the character and amenity of the streetscape and wider environment:*

The trees are deciduous and are typical of tall canopy trees in the ARHMZ. They contribute to the character and amenity values on the intersection of Anglesea Street and Merioneth Street. They soften and screen the view of the built form in the area from the road and provide tall tree structure to this neighbourhood. Together these two trees make up a significant component of the tree canopy at this intersection and in the wider neighbourhood. Large deciduous trees are a significant and important feature contributing to the character and amenity of the ARHMZ.

(b) *Whether the vegetation contributes to heritage values:*

The trees contribute to heritage values of the area in the sense that they are typical of trees planted by the early settlers and miners (refer further comments under (c) below).

(c) *The age of the vegetation and if it is vegetation that was typical/representative of early plantings in Arrowtown:*

The trees are not fully grown but are typical and representative of early plantings in Arrowtown. This is particularly so for the Walnut tree. Walnut trees date back to early fruit and nut orchards in Arrowtown. They were a common feature in early Arrowtown and remain so today.

The Copper Beech is less representative of early plantings in Arrowtown. However, it is similar in appearance to the large European species that are the key vegetation feature (in particular

the urban tree character) that provides character and amenity within the zone.

- 6.9** There were no reasons included in the submission of Mr Stewart for the removal of the listing of this group of trees. In my opinion there is no reason for the Council to reconsider the classification of these trees as character trees.

A handwritten signature in black ink, appearing to read 'Philip Blakely', written in a cursive style.

Philip Blakely
Registered Landscape Architect
1 June 2016

Appendix A

Schedule of recommended character trees provided by me to the Council in 2014, prior to notification of the PDP

ARROWTOWN TREE SURVEY - NOVEMBER 2014

| LOCATION | SPECIES | JUSTIFICATION |
|--|--|--|
| 3 Berkshire St | Hawthorn hedge (<i>Crataegus monogyna</i>) English Oak (<i>Quercus robur</i>) cluster | Contributes to amenity of Arrow Lane and Town Centre |
| 5 Berkshire St | Cypress (<i>Cupressus</i> sp) | Tall columner distinctive evergreen tree in backdrop to Town Centre. |
| 7 Berkshire St | Norway Spruce (<i>Picea abies</i>) | Tall landmark tree planted by settlers. Heritage and amenity values |
| 8&9 Berkshire St | Hawthorn hedge (<i>Crataegus</i> sp) | Heritage and amenity value on Berkshire St |
| 9, 11,12, 58 Wiltshire St and 10,12 Merioneth St | Sycamore (<i>Pseudoplatanus</i>) Common Elm (<i>Ulmus procera</i>) | Collectively significant grouping to character and amenity of lower Wiltshire St, Buckingham St and Library Green. Follows first terrace |
| 16 Wiltshire St | Hawthorn hedge | Heritage and amenity |
| 5 Denbigh St | Copper beech (<i>Fagus silvatica Purpurea</i>) | Amenity value. Only tall tree in this block. Provides stature and amenity. |
| 28 & 30 Buckingham St | English Oak (<i>Quercus robur</i>) | Amenity value |
| 10 Buckingham St | Lombardy poplar (<i>Populus nigra 'Italica'</i>), Walnut (<i>Juglans regia</i>) | Heritage and character |
| 70 Buckingham St | Red oak (<i>Quercus rubra</i>), Sycamore, Copper beech) | Large deciduous trees contributing to character and heritage. Sycamore planted by settlers. |
| 12 Camp Lane | Sycamore | Heritage and amenity. Large deciduous tree |
| 64 Buckingham and 7 Merioneth St | Hawthorn hedges, Copper beech, Prunus sp, European Elm, Lombardy poplar | Heritage and amenity adjoining Buckingham St |
| 51 Buckingham St | Claret Ash, Prunus sp, Acer sp | Amenity |
| 5,7,9,11 Surrey St | Lombardy poplar (<i>P. nigra 'Italica'</i>) and macrocarpa (<i>Cupressus macrocarpa</i>) | Heritage and rural character. |
| 4 Merioneth St | Prunus sp, walnut, red oak | |
| 6 Merioneth St | Copper beech (<i>Fagus silvatica 'Purpurea'</i>) | Amenity |
| 9 Merioneth St | Lombardy poplar | Heritage and amenity |
| 23 Merioneth St | Walnut | Heritage and amenity |
| 29 Merioneth St | Silver birch (<i>Betula</i> sp.) Partly on road reserve | Amenity value |
| 11 Bedford St (borders reserve) | Sycamore (<i>Acer Psuedoplatanus</i>), European Ash (<i>Fraxinus</i> sp), Prunus spp. Hawthorn, Douglas fir (<i>Psuedosuga menziesii</i>) | Significant tree grouping that contributes to streetscape amenity and amenity of adjoining reserve. |
| 17 Bedford St | English Elm (<i>Ulmus procera</i>) 2 | Forms part of historic avenue on intersection of Buckingham and Bedford Sts |

| | | |
|--|---|---|
| 14,16,18 Nairn St | Hawthorn hedge and Sycamore | Contributes to heritage and amenity values on Nairn St |
| 30 Nairn St | Walnut (<i>Juglans regia</i>) | Large deciduous nut tree with historic and amenity value |
| 43 Bedford St | Privet hedge on Buckingham St frontage (<i>Ligustrum ovalifolium</i>), Ash (<i>Fraxinus</i> sp) | Amenity, streetscape character |
| 69,71 Buckingham St | English oak (<i>Quercus robur</i>), Walnut (<i>Juglans regia</i>) (on boundary of both lots) | Heritage trees |
| *69 Buckingham St | English beech (<i>Fagus sylvatica</i>) | Amenity and character |
| 10,12 Merioneth St | Poplar, (<i>P. nigra</i> 'Italica') sycamore 'Acer Psuedoplatanus' <i>Fraxinus</i> sp | Part of treed backdrop following river terrace and providing enclosure and backdrop to Library Green |
| 5 Hertford St | Privet hedge | Amenity and heritage values |
| 7 Hertford St | Douglas fir (<i>Pseudotsuga menziesii</i>) | Tall landmark tree planted by early settlers |
| 13 Hertford St | Walnut (<i>Juglans regia</i>) | Tall edible nut tree. Representative of early settler plantings. |
| Upper Camp Lane linking through to Cardigan St (overlaps 15,17,19 Hertford St and 22,28 Cardigan St) | English Elm (<i>Ulmus procera</i>) Sycamore (<i>Acer Psuedoplatanus</i>), Rowan (<i>Sorbus aucuparia</i>), Douglas Fir (<i>Pseudotsuga menziesii</i>) 3 Walnuts (<i>Juglans regia</i>) | Forms part of green belt following the first terrace above the Arrow River |
| 21 Anglesea St | NZ Mountain Beech (<i>Nothofagus solandri</i> var. <i>Cliffortoides</i>) | Good example of mountain beech. Provides link to natural beech in surrounding mountain gullies. There are few native beech growing within Arrowtowns Historic Zone. |
| 20/22 Anglesea St | Walnut, Cherry Plum | |
| 24 Anglesea St | Copper Beech (<i>Fagus sylvatica</i> 'Purpurea'), Walnut (<i>Juglans regia</i>) | Large amenity tree in neighbourhood with few tall trees |
| 9 Anglesea St | Privet hedge on frontage and fruit trees at rear | Heritage and amenity value |
| 10 Anglesea St | Hawthorn hedge | Heritage and amenity |
| 11 Anglesea St | Mixed species hedge on front boundary (<i>Viburnum</i> , Privet, Lilac) | Heritage and amenity |
| 9 Denbigh St | Lilac (<i>Syringa</i>) Pittosporum, Flowering quince (<i>Chaenomeles</i>), Privet (<i>Ligustrum ovalifolium</i>) | Good example of a tapestry hedge of multiple sp. Hedge is on Anglesea St boundary |
| 12 Hertford St | Copper Beech (<i>Fagus sylvatica</i> 'Purpurea') | |
| 13 Berkshire St | Red oak (<i>Quercus rubra</i>), Pin oak (<i>Quercus palustris</i>), Kowhai (<i>Sophora microphylla</i>), Poplar sp (<i>Populus</i> sp), cherry laurel (<i>Prunus laurocerasus</i>) | This section belonging to the Anglican Church is unbuilt on and provides visual relief and amenity on the corner of Berkshire and Anglesea Sts. |
| 1&5 Anglesea St | English Elm (<i>Ulmus procera</i>), Flowering Quince, (<i>Chaenomeles japonica</i>), Mountain beech, (<i>Nothofagus solandri</i> 'Cliffortoides') Walnut (<i>Juglans regia</i>), Broadleaf Griselinia littoralis) English Oak (<i>Quercus robur</i>), Gooseberry | Vegetation bordering Rose Douglas Park and 5 Anglesea St. Provides enclosure, amenity and screening to park |

| | | |
|----------------------------------|--|---|
| | (Ribes ulva crispa), crabapple (Malus sp) | |
| 5 Anglesea St | Chaenomeles & Privet hedge | Contributes to historic streetscape on Anglesea St. |
| Road Reserve Berkshire St Avenue | Red Oak, Sycamore, European Ash, Ulmus procera | Historic tree avenue forming western entrance to Arrowtown |
| 15 Berkshire St | Cherry laurel, English elm, Picea sp | Contribute to setting and context of historic Anglican timber church |
| 10,22,24,26 Berkshire St | Holly hedge | Contributes to historic character of Berkshire St avenue |
| 19, 21, 23 Berkshire St | Hawthorn and English Elm hedge | Contributes to historic character of Berkshire St avenue (Note: hedge on 19 Berkshire St continues into Caernarvon St) |
| 14,16,18 Caernarvon St | Fruit trees at rear | Part of early orchard. Heritage values |
| 18 Caernarvon St | Red Oak, Walnut trees, fruit trees and Hawthorne hedge | Amenity and streetscape character |
| 22 Caernarvon St | Walnut | Tall nut tree representative of early plantings. |
| 24 Caernarvon St | Lonicera hedge | Historic character to timber bungalow and wider streetscape |
| 25 Caernarvon St | Walnut | Tall edible tree representative of trees planted by early settlers |
| 22 Denbigh St | Walnut | Amenity and heritage value |
| 32 Caernarvon, 21 Denbigh St | English Oak | Tall mature tree. Amenity values |
| 36 Caernarvon St | 2 Walnuts | Early planting with heritage and amenity values |
| 40 Caernarvon St | Copper Beech | Tall amenity tree in prominent location |
| *41 Caernarvon St | Copper beech, Hawthorn hedge | Amenity and heritage |
| 34 Merioneth St | Copper beech, Hawthorn hedge, Red Oak, Prunus sp | Copper beech is a distinctive tall tree and hawthorne hedge contributes to heritage and amenity |
| 31 Merioneth St | Lombardy poplar, Sycamore Damson plum, Hawthorn hedge, Quercus sp assorted fruit trees eg Pear, apricot, cherry laurel | Heritage values associated with historic Tobins Cottage. Contributes to old town character |
| 37,33a,33 Caernarvon St | Hawthorn hedge | Heritage character and amenity |
| 19 Denbigh St | Almond, lilac, walnut, and hedge consisting of cotoneaster, pittosporum, & viburnum | Significant vegetation on corner of Caernarvon and Denbigh St. Contributes to heritage and amenity |
| 7 Villiers St | Fruit trees, walnut, monkey puzzle | Heritage values (Reidhaven) and botanical interest |
| 1 Villiers St | Cypress sp (Cupressus sp) | Tall conifer. One of few conifers. |
| *13 Cardigan St | Red Oak (Quercus rubra) | Tall tree. Amenity value |
| *2 Cardigan St | Lombardy poplar (Populus sp) | Heritage. Common early tree planted by settlers |
| *6,8 Hertford St | Holly and hawthorn hedges | Heritage and amenity/streetscape value |

Common Name

Hawthorn
English Oak
Cypress spp
Norway Spruce
Sycamore
English or common Elm
Pin Oak
Red Oak
Copper Beech
English beech
Lombardy Poplar
Macrocarpa
European or common Ash
Prunus sp
Rowan or Mountain Ash
Douglas Fir or Oregon
Lime or Linden Tree
Mountain beech
'Cliffiortoides'
Privet
Common Lilac
Flowering Quince
Kowhai
Poplar
Cherry Laurel
NZ broadleaf
Gooseberry
Crabapple
Spruce
Holly
Damson plum
Almond
Cotoneaster sp
Pittosporum or Kohuhu
Laurustinus
Claret Ash

Botanical Name

Crataegus monogyna
Quercus robur
Cuppressus spp
Picea abies
Acer Psuedoplatanus
Ulmus procera
Quercus palustris
Quercus rubra
Fagus silvatica 'Purpurea'
Fagus silvatica
Populus nigra 'Italica'
Cuppressus macrocarpa
Fraxinus excelsior
Prunus ap
Sorbus aucuparia
Psuedosuga menziesii
Tilia europaea
Nothofagus solandri

Ligustrum ovalifolium
Syringa x vulgaris
Chaenomeles japonica
Sophora microphylla
Populus sp
Prunus laurocerasus
Griselinia littoralis
Ribes uva-crispa
Malus sp

Ilex aquifolium
Prunus damson
Prunus dulcis
Cotoneaster sp
Pittosporum tenuifolium
Viburnum tinus
Fraxinus x 'Raywoodii'

Appendix B –

**Photos of Items 6 and 34 contained within 32.7 Schedule of Character Trees taken in May
2016**



PHOTO 1: Photo of Character Trees contained in Item 34. Copper Beech (right) and Walnut tree (left) from Merioneth St (close to intersection of Meroneth and Anglesea Streets), May 2016.



PHOTO 2: View from Anglesea Street of Character Trees contained in Item 34. Copper Beech and Walnut in late autumn May 2016).



PHOTO 3: Character Tree Item 6. View of Hawthorne hedge at 16 Wiltshire Street (May, 2016).



PHOTO 4: Character Tree Item 6. View of Hawthorne hedge at 16 Wiltshire Street (May, 2016).