

**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 Stage 3b of the Proposed District Plan

**REBUTTAL EVIDENCE OF BRIDGET MARY GILBERT
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**LANDSCAPE ARCHITECTURE
RURAL VISITOR ZONE AND SETTLEMENT ZONE – REZONINGS**

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1. INTRODUCTION

- 1.1** My full name Bridget Mary Gilbert. My qualifications and experience are set out in my statement of evidence in chief dated 18 March 2020.
- 1.2** 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.

2. SCOPE

- 2.1** My rebuttal evidence is provided in response to the following evidence filed on behalf of various submitters:

Rural Visitor Zone

- (a) Mr Benjamin Espie (landscape architect) for Loch Linnhe Station Limited (**31013**) (**Loch Linnhe**).
- (b) Mr Benjamin Espie (landscape architect) for Glen Dene Limited, Glen Dene Holdings Limited and Burdon (**31043**) (**Lake Hāwea Holiday Park**).

Settlement Zone

- (c) Mr Benjamin Espie (landscape architect) for Universal Developments Limited (**3248**) (**Universal Developments**).

- 2.2** I have read the evidence of the following experts:

Rural Visitor Zone

- (a) Mr Carey Vivian (planner) for Loch Linnhe (**31013**).
- (b) Mr Duncan White (planner) for Lake Hāwea Holiday Park (**31043**).

Settlement Zone

- (c) Mr Carey Vivian (planner) for Universal Developments (**3248**).

2.3 I did not prepare primary evidence in relation to the Settlement Zone. However, I did prepare a Landscape Report for Council in August 2019, that considered the potential for a change to the Urban Growth Boundary (UGB) at Hāwea (**2019 UGB Landscape Report**). My 2019 UGB Landscape Report is relied on and attached as Appendix 2 to the Council's Section 32 Evaluation for Stage 3 Components for Townships.

REZONING REQUESTS, RURAL VISITOR ZONE

3. MR BENJAMIN ESPIE FOR LOCH LINNHE (31013)

3.1 I understand from the expert landscape and planning evidence (prepared by Mr Espie and Mr Vivian respectively), that the submitter has refined their relief and seeks a 'tailored' Rural Visitor Zoning across their land that applies the following parameters that are of relevance to landscape related effects:

Wye Creek RVZ¹ (i.e. the northern area)

- (a) Modification to the extent of the proposed Wye Creek RVZ.
- (b) The identification of a 'central area' within the Wye Creek RVZ (approximately 1ha in extent)², where a maximum building footprint of 1,800m² applies with a controlled activity status for buildings, defaulting to non-complying activity status for non-compliance with this standard. (NB corresponds to the green area in **Figure 1** below.)
- (c) For the balance of the Wye Creek RVZ, buildings would require a discretionary activity consent. (NB corresponds to the orange area in **Figure 1** below.)
- (d) An allowance for one residential building. Mr Espie's evidence suggests that this dwelling would be located in the 'central area' (i.e. the green area in **Figure 1** below); however, the provisions recommended in Mr Vivian's evidence do not appear to make this distinction.

¹ Referred to as 'Area 1' in my EiC.

² Noting that Mr Espie's evidence is unclear on the extent of this area, describing it as measuring 1,750m² and 1ha in his EiC paragraph 4.1, first sub bullet point.

- (e) A requirement for no buildings in the Moderate-High Landscape Sensitivity Area (orange area in **Figure 1** below) to be visible from State Highway 6 (**SH6**).³
- (f) A limit of 10 overnight visitors.
- (g) A requirement for informal airports to have a non-complying activity status.



Figure 1: Wye Creek RVZ (Source: C Vivian evidence)

Loch Linnhe RVZ⁴ (i.e. the southern area)

- (a) Modification to the extent of the proposed Loch Linnhe RVZ.
- (b) The identification of a 'northern area' within the Loch Linnhe RVZ around the existing homestead and farm buildings (approximately 3.6ha in extent⁵), where a maximum building footprint of 4,700m² applies with a controlled activity status for buildings, defaulting to non-complying activity status for non-compliance with this standard. (NB corresponds to the green area in **Figure 2** below.)

3 There would appear to be a discrepancy between Mr Vivian's and Mr Espie's evidence in this regard. Mr Espie's EiC paragraph 4.1 infers that this lack of visibility from SH6 applies to the central (green) area, whilst Mr Vivian's recommended provisions state that it applies to the area of Moderate-High Landscape Sensitivity (orange area). For the purposes of my rebuttal evidence, I have considered Mr Vivian's proposition in this regard.

4 Referred to as 'Area 2' in my EiC.

5 Noting that Mr Espie's evidence is unclear on the extent of this area, describing it as measuring 1,750m² and 1ha in his EiC paragraph 4.1, first sub bullet point.

- (c) For the balance of the Loch Linnhe RVZ, buildings would require a discretionary activity consent. (NB corresponds to the orange area in **Figure 2** below.)
- (d) A limit of 30 overnight visitors.



Figure 2: Loch Linnhe RVZ (Source: C Vivian evidence)

3.2 I also note that:

- (a) The total existing building coverage within the northern (green) area of Loch Linnhe RVZ is 2,200m². This means that the additional building coverage enabled by the proposed provisions comprises 2,500m². For comparison purposes, this would enable five buildings each of 500m² footprint as a controlled activity.
- (b) The largely exotic vegetation throughout much of the Wye Creek RVZ area is not protected under the Operative District Plan (**ODP**) or the Proposed District Plan (**PDP**). Therefore, it is my understanding that this vegetation could be removed as of right.
- (c) Mr Espie explains that it is his expectation that development in the Wye Creek RVZ would likely take the form of a cluster of five buildings running in a north south band, close to the

western side of the zone area with trees on their southern and eastern sides.

Landscape Effects Discussion

Wye Creek RVZ

- 3.3 I disagree with Mr Espie that the proposed (tailored) Rural Visitor Zone sought for the Wye Creek site is appropriate from a landscape perspective.
- 3.4 My disagreement is based on the following factors:
- (a) The absence of detailed contour information and a thorough landscape analysis, supporting:
 - (i) the extent of RVZ sought in this location; and
 - (ii) the breakdown of the landscape sensitivity ratings across the area identified in Mr Vivian's recommended provisions.
 - (b) A potential underestimation of the scale of adverse visual effects in relation to views from Lake Wakatipu, which is an Outstanding Natural Landscape (**ONL**). In this regard, I note that a marina is envisaged at Homestead Bay (suggesting the potential boating activity throughout the southern arm of the lake is likely to increase), and the exotic vegetation throughout the Wye Creek RVZ could be removed as of right.
 - (c) A potential underestimation of the scale of adverse landscape effects, particularly in light of the potential visibility of RVZ development at Wye Creek in views from Lake Wakatipu. I do, however, acknowledge that care has been taken to manage adverse visual effects in relation to views from SH6.
 - (d) In my opinion, successfully integrated development throughout the southern arm of the lake is typically: located in natural localised landform hollows and/or well integrated by plantings; and comprises a sympathetic building design. The proposed Wye Creek RVZ provisions as currently proposed would not give certainty of such an outcome.

- 3.5** Put simply, I consider that there is inadequate ‘base’ information (particularly in relation to the topographical patterning of the land), and subsequent landscape and visual effects analysis to support the Wye Creek RVZ.
- 3.6** I remain of the view that a thorough landscape assessment is required that can give confidence that the character of landscape change associated with a Wye Creek RVZ will satisfy the fundamental landscape policy requirements in ONLs, that development: protects landscape values; and, is reasonably difficult to see.
- 3.7** Based on my site visit, I consider that the landscape sensitivity of this location points to appropriate RVZ development at Wye Creek including a well-crafted structure plan approach that responds to the landscape opportunities and constraints identified in my evidence in chief, with a minimum restricted discretionary activity status for buildings applying. I note in this regard it would appear that Mr Espie has misinterpreted my recommendations as an ‘either or’ scenario.⁶
- 3.8** Further, I consider that such an approach corresponds to a ‘landscape-led’ RVZ policy approach, which I consider appropriate within an ONL context.

Loch Linnhe RVZ

- 3.9** In a similar vein, I am unconvinced that the proposed (tailored) Rural Visitor zoning sought for the Loch Linnhe site is appropriate from a landscape perspective.
- 3.10** My disagreement with Mr Espie in this regard is based on the following factors:
- (a) The absence of detailed contour information and a thorough landscape analysis supporting:
- (i) the extent of RVZ sought in this location; and

6 B Espie EiC paragraph 7.4.

- (ii) the breakdown of the landscape sensitivity ratings across the area identified in Mr Vivian's recommended provisions.
- (b) A potential underestimation of the scale of adverse visual effects in relation to views from Lake Wakatipu. In this regard, I note that a marina is envisaged at Homestead Bay (suggesting the potential boating activity throughout the southern arm of the lake is likely to increase), and the exotic vegetation throughout the Loch Linnhe RVZ could be removed as of right.
- (c) A potential underestimation of the scale of adverse visual effects in relation to views from SH6, noting that Mr Espie's evidence makes no distinction between the potential visibility of the northern and southern portions of the proposed Loch Linnhe RVZ (i.e. the green and orange areas) from the highway.
- (d) A potential underestimation of the scale of adverse landscape effects, particularly in light of the potential visibility of RVZ development at Loch Linnhe in views from Lake Wakatipu (ONL) and SH6 (within ONL).
- (e) In my opinion, successfully integrated development throughout the southern arm of the lake and this stretch of SH6 is typically: located in natural localised landform hollows, set well back on fan terraces and/or well integrated by established vegetation; and comprises a sympathetic building design. The proposed Loch Linnhe RVZ provisions as currently proposed would not give certainty of such an outcome.

- 3.11** Again, I consider that there is inadequate 'base' information (particularly in relation to the topographical patterning of the land and consideration of views from Lake Wakatipu), and subsequent landscape and visual effects analysis to support the Loch Linnhe RVZ.
- 3.12** I remain of the view that a thorough landscape assessment is required that can give confidence that the character of landscape change associated with the Loch Linnhe RVZ will satisfy the fundamental

landscape policy tests within an ONL of: protecting the landscape values of the ONL; and being reasonably difficult to see.

- 3.13** Based on my site visit, I consider that the landscape sensitivity of this location points to appropriate RVZ development at Loch Linnhe including a well-crafted structure plan approach that responds to the landscape opportunities and constraints identified in my evidence in chief, with a minimum restricted discretionary activity status for buildings applying. (In this regard, again it would appear that Mr Espie has misinterpreted my recommendations as an ‘either or’ scenario.⁷)
- 3.14** Further, I consider that such an approach corresponds to a ‘landscape-led’ RVZ policy approach, which I consider appropriate within an ONL context.

4. MR BENJAMIN ESPIE FOR GLEN DENE LIMITED, GLEN DENE HOLDINGS LIMITED AND BURDON (31043) - LAKE HĀWEA HOLIDAY PARK

- 4.1** I understand from the expert landscape and planning evidence that the submitter has refined their relief and seeks a ‘tailored’ Rural Visitor Zone across their land that applies the following parameters that are of relevance to landscape related effects:
- (a) Total building coverage limited to 7% of the zoned area with buildings managed as a controlled activity.
 - (b) Non-compliance with the building coverage limits defaulting to a non-complying activity status.
 - (c) A requirement for buildings to be set back at least 20m from SH6.
 - (d) Residential activity is non-complying.
 - (e) A variable allowable building height within the proposed RVZ that sees 8m high buildings enabled throughout the central and western portion of the site and a 5.5m building height control applied to the eastern/lake edge portion of the site – see **Figure 3** below.
 - (f) Exclusion of recreational camping and glamping tents from the Building Materials and Colours standard.

7 B Espie EiC paragraph 7.4.



Figure 3: Lake Hāwea Holiday Park RVZ (Source: B Espie evidence)

4.2 I note that the relief now sought by the submitter is consistent with the rezoning request addressed during the Stream 12 Upper Clutha Mapping Annotations and Rezoning Requests hearing (May and June 2017).

4.3 I also note that:

- (a) The total existing building coverage on the site is 1,094m².⁸
- (b) A building coverage control of 7% amounts to an overall building footprint of 15,890m² on the site. For comparison purposes, this would enable approximately 31 buildings, each of 500m² footprint as a controlled activity.
- (c) The extensive exotic and indigenous vegetation on site that gives the property its heavily treed and parkland type character, and serves to successfully integrate the existing built development and campground activity, is not protected under the ODP or the PDP. Therefore, it is my understanding that this vegetation could be removed as of right.

4.4 In addition, the evidence of Messrs Espie and White references the campground designation, which provides for a building coverage of 40% throughout the Section 2 Block II part of the site, inferring some sort of ‘effects baseline’ in this regard. It is my understanding that a ‘permitted baseline’ is not relevant in a plan change process and the designation does not form part of the ‘existing environment’ (as consent for development within the campground is required from Council).

4.5 Ms Grace has also advised that an Open Space Recreation (Camping Ground) zone (**CPZ**) applies to the Designation area under the Decision Version of the PDP. Buildings have a controlled activity status with an 8m building height control, a 600m² coverage limit and exterior colour controls applying.

4.6 I understand that the CPZ provisions are under appeal.

Landscape Effects Discussion

4.7 I disagree with Mr Espie that the proposed (tailored) Rural Visitor Zone sought for this site is appropriate from a landscape perspective.

8 Report 16.6 Stream 12 Upper Clutha Mapping Häwea Campground, paragraph 56.

- 4.8** The level or extent of built development that would be enabled as a controlled activity comprises approximately 60% more than the existing building coverage (or a change from effectively two 500m² buildings⁹ to thirty-one 500m² buildings).
- 4.9** In my opinion, development at this level could see the removal of an appreciable amount of the existing tree cover on the site to make way for new buildings and associated access routes and parking areas. This is despite the controlled activity status for buildings (which includes the consideration of landscape treatment and planting), given that this vegetation could be removed as of right under the Plan.
- 4.10** The absence of a landscape buffer along the lake edge means that the proposed rezoning could see a change from a vegetation-dominated lakefront to a building-dominated lakefront. I expect that such an outcome is probable, given the very high visual amenity values associated with this part of the site.
- 4.11** I consider that such an outcome would detract from the visual amenity values associated with views to the site from the lake itself (an ONL), lake edge (also ONL), township, Gladstone (Johns Creek environs) and walking tracks in the area (again, ONL). This change to the lakefront character would also, in my view, detract from the naturalness values associated with the site and lake (both ONL).
- 4.12** I consider that notwithstanding the proposed height controls, the change in the balance of buildings to open or green space on the land contemplated by the proposed rezoning has the potential to erode the perception of the area as a very low-key green node of development.
- 4.13** I note the Vegetation Management Plan standard recommended by Mr White,¹⁰ however this amounts to a simple Landscape Plan and Landscape Management Plan requirement for future controlled activity resource consents, with no guidance as to what outcomes the Landscape Plan (in particular) needs to deliver. (For example, filtering

⁹ Noting that existing buildings on the site include a wide range of smaller cabins and ablution facilities along with communal facility buildings.

¹⁰ D White EIC, Appendix C, page 46-9.

of views from the highway, backdropping development in views from the lake, reinforcing the landform patterns.)

4.14 In my view, the outcome anticipated by the proposed bespoke RVZ provisions would undermine the integrity of a defensible urban edge around the western side of the Hāwea township and contribute to the perception of development creep northwards along the western side of the lake that would detract from landscape values (naturalness, aesthetic values and shared and recognised values).

4.15 With respect to the 20m landscape buffer along the SH6 frontage of the site, I share the concerns raised by Ms Mellsop in her Stage 1 evidence:

4.6 *....Much of the land is clothed in low bracken and exotic weeds and is highly visible from the highway. In paragraphs 5.17 and 5.18 of his evidence, Mr Espie states that the proposed density standard [7% building coverage], the 20 metre setback and the consent authority's control over landscaping would ensure that visual amenity would be maintained for users of SH6.*

4.7 *I disagree with this opinion. In the northern third of the lot, the land slopes gently eastward from SH6 and built development of 8 metres in height and 20 metres from the road boundary would be visually prominent from the highway. Planting to adequately mitigate the adverse visual effects of such development would obscure valued views from the road to Lake Hāwea and the more distant mountains. In the southern two-thirds of the lot, the land slopes more steeply from SH6 but the 20-metre set back would allow built development set into the slope and visible from the road. Once again, planting to screen buildings could also obscure valued views of the ONL. In my view the only part of this lot that has potential to absorb built development without compromising the visual amenity values of the landscape is the lower sycamore-covered area immediately adjacent to the existing campground activities.¹¹*

11 H Mellsop Stage 1 Hearing Stream 12 Rebuttal Evidence, paragraphs 4.6 and 4.7.

- 4.16** In addition, the configuration of the landscape buffer at a consistent width of 20m has little regard for the underlying landform patterning and existing mature vegetation patterning throughout this part of the site. For development to sit comfortably into this ONL context generally, and more particularly, in views from the lake and wider context to the north east, east and southeast (i.e. Hāwea township lakefront), it is usual to configure landscape buffers in response to such ‘legible’ landscape patterns, rather than an arbitrary setback.
- 4.17** I also agree with Ms Mellsop’s comments (in her Stage 1 evidence¹²) in relation to the northern isolated block that forms part of the area proposed for rezoning (i.e. Lot 1 DP418972), where she comments that development in accordance with the ODP RVZ would result in an inappropriate sprawl of development northwards from the existing campground. This parcel is separated from the balance of the site by an open area of pasture administered by Contact Energy and does not form part of the campground. It is covered in either self-seeded conifers, bracken, or grass and is visible from the lake and highway.
- 4.18** In my view, RVZ development of the type envisaged by Messrs Espie and White would also result in inappropriate sprawl of development northwards for the existing campground node, thereby undermining the impression of a defensible edge to Hāwea and the notion of the campground as a sympathetic green node of development that bookends the western side of the settlement.
- 4.19** For these reasons, I consider that the tailored RV zoning sought for the Lake Hāwea Holiday Park will generate adverse landscape and visual effects and will detract from the aesthetic values, naturalness values, shared and recognised values of the ONL within which the site is located. In my opinion, such an outcome would fail to satisfy the fundamental landscape policy requirements in ONLs, that development: protects landscape values; and, is reasonably difficult to see.
- 4.20** In making these comments, I am mindful of the evidence of Mr and Mrs Burdon, who express the desire to retain a parkland-dominated

12 Ibid, paragraph 4.5.

character for the area and develop a high-quality rural visitor development, and note that Mr Espie would appear to factor this vision into his analysis.¹³ Whilst such an outcome is likely to be appropriate from a landscape perspective, it is unfortunately not what the proposed provisions anticipate (from a landscape effects perspective).

- 4.21** Overall, I am left with the impression that the tailored RVZ provisions for the Lake Hāwea Holiday Park lack a ‘landscape-led’ approach, which is typically required in ONLs.
- 4.22** To be clear, Mr Espie has incorrectly assumed that the proposed changes to the relief sought have addressed the landscape concerns raised in my evidence in chief.
- 4.23** Further, assuming the tailored RVZ provisions for Lake Hāwea Holiday Park outlined in the evidence of Messrs Espie and White, I remain of the view that the site has a landscape sensitivity that rates towards the mid to higher end of the spectrum for the reasons outlined in my evidence in chief. More specifically, I consider that the western and eastern sides of the site and the isolated northern block have a high landscape sensitivity to development change of the type contemplated by the RVZ.¹⁴

Landscape Recommendations

- 4.24** Putting to one side my difficulties with the tailored provisions outlined in the submitters’ expert evidence, I still consider that the site has the potential to successfully absorb a modest level of rural visitor development.
- 4.25** As outlined in my evidence in chief, my preference would be for RVZ development on this site to apply a restricted discretionary regime for buildings (as a minimum) and a location-specific structure plan that details the key aspects of future RVZ development that are required to secure an appropriate landscape outcome.

13 For example, see, B Espie Stage 3b Hearing Stream 18 EiC paragraph 8.11
14 In this regard I note that Mr Espie’s evidence does not

4.26 However, I understand from the Burdon's evidence that there is a strong desire to minimise more complex consenting requirements and therefore have turned my mind to the sort of RVZ activity that might be appropriate on the site as a controlled activity (from a landscape perspective).

4.27 I consider that the following characteristics could shape an appropriate site-specific RVZ at Lake Hāwea Holiday Park:

- (a) A generous landscape buffer/BRA along the highway edge that takes in all of the steeply sloping land adjacent the highway, together with a sizeable band of established mature vegetation that runs along this side of the property and which serves as a buffer between the existing campground facilities and the highway. Such a landscape buffer would provide an effective filter and screen to new development within the RVZ in views from SH6 whilst maintaining views from the highway out over the lake.
- (b) A spacious landscape buffer/BRA along the lakefront edge of the site that secures the maintenance of a multi-layered patterning of mature vegetation to filter and/or screen new buildings in views from the lake, lake edge, township, Gladstone and walking tracks in the area.
- (c) Confinement of the 'developable' RVZ to the existing 'operational' campground area (excluding the above buffer/BRA areas) with an appropriate building coverage limit determined in response to the extent of open (i.e. non-treed) buildable land within the identified area to secure the existing parkland character of the campground. The 'developable' RVZ area should exclude the isolated block to the north of the site (Lot 1 DP 418972).
- (d) A 5m maximum building height control.
- (e) Allowance for camping and glamping tents to be excluded from the Building Materials and Colours standard.

REZONING REQUESTS: SETTLEMENT ZONE

5. MR BENJAMIN ESPIE FOR UNIVERSAL DEVELOPMENTS (3248),

- 5.1** Universal Developments seek to upzone approximately 140ha of land on the south side of Hāwea from Rural and Rural Residential to a range of urban zonings guided by a Structure Plan. Mr William's provides a **full description of the proposal**. Aspects of particular relevance to an analysis of landscape and visual effects are summarised below:
- (a) The integration of a series of landscape buffers around some of the edges of the proposed Structure Plan areas as follows:
- (i) A 5m width Building Restriction Area (**BRA**)/green buffer along the Domain Road (western) frontage of the Streat Group land, which incorporates a pedestrian/cycle route.
 - (ii) A 15m width BRA/green buffer (which incorporates a pedestrian/cycle route) along the Domain Road frontage of (proposed) Low Density Suburban Residential (**LDSR**) zoned and General Industrial (**GIZ**) zoned land.
 - (iii) A 15m width BRA/green buffer along the southern boundary of the Structure Plan area adjoining Rural land and coinciding with a cadastral boundary.
 - (iv) A short length of 15m width BRA/green buffer along the eastern side of the Structure Plan area extending from the northern end of the proposed GIZ to the water race and adjacent proposed LDSR (with Rural land to the east), which incorporates a pedestrian/cycle route.
- (b) The integration of a 15m width BRA/green buffer (which incorporates a pedestrian/cycle route) along the water race that winds its way roughly through the centre of the site.

- (c) A 15m width BRA/green buffer (which incorporates a pedestrian/cycle route) between the proposed LDSR and GIZ areas towards the southern end of the site.
- (d) A triangular shaped BRA/Reserve area approximately midway along the Domain Road frontage of the site (noting that this area is currently zoned Rural Residential).
- (e) The inclusion of the comprehensive landscape design and planting of the building restrictions areas and timing for construction of the pedestrian and cycle trails as a matter of control for any future subdivision process.
- (f) A band of GIZ throughout the southern portion of the site which allows 75% building coverage and 10m high buildings. Location-specific controls: GIZ fencing controls are proposed that preclude the use of barbed or razor wire fencing and require fencing along open space areas to be 1.2m high.
- (g) Medium Density Residential (**MDR**) zoning throughout a block immediately west of the consented Special Housing Area (**SHA**) and fronting Cemetery Road. This zoning provides for building coverage of 45% with a maximum density of one residential unit per 250m². A landscape permeable surface coverage control of 25% applies together with a 3m road boundary setback and 1.5m side/rear yard setback requirement.
- (h) LDSR zoning (450m² lot size) or a school throughout the block fronting Cemetery Road sitting between the proposed MDR area and the Streat Group land.
- (i) A Local Shopping Centre in the north-western portion of the consented SHA area (fronting Cemetery Road).
- (j) LDSR throughout the balance of the site, which provides for one residential unit per 450m² and further density down to 1 dwelling per 300m² where the houses are built first.

- 5.2** For the purposes of this statement of evidence, I adopt the **description of the site and local area** outlined in my 2019 UGB Landscape Report. I acknowledge that since that report was prepared, a resource consent has been granted to the SHA that enables the development of 465 residential allotments, reserves, a childcare centre, commercial building and a bulk title to provide for future consideration of commercial and community uses within an area of 2.6ha. Reticulated servicing via extension of the Council network is proposed to service the SHA development and 12.5% of the serviced sections are to be gifted to the Queenstown Lakes Community Housing Trust.
- 5.3** Drawing from my evidence for the PDP Stage 1 Topic 2 Appeal hearings, I also confirm that in my opinion, the site is located within a s7(c) Amenity Landscape. I note that a Rural Landscape Character (**RCL**) classification applies to the site and surrounding Rural zoned land under the Decisions Version of the PDP.
- 5.4** I understand the **key planning themes** of relevance to the consideration of 'landscape' effects for the proposed rezoning to be as follows:
- (a) Building on historical settlement patterns. (Strategic Objective (**SO**) 3.2.2.1 (b)).
 - (b) Protecting the District's rural landscapes from sporadic and sprawling development. (SO 3.2.2.1 (e)).
 - (c) Maintaining landscape character in RCLs (SO 3.2.5.2 (a)).
 - (d) Maintaining or enhancing visual amenity values in RCLs (SO 3.2.5.2 (b)).
 - (e) Minimising significant adverse effects on the values of open rural landscapes when locating UGBs or extending rural settlements (Policy 4.2.1.5(a), consent order version).
- 5.5** I have structured my rebuttal in a similar manner to Mr Espie's evidence, although have reordered my discussion of appropriateness (or 'effects'), as I consider that an analysis of the proposed edge and visual amenity effects (along with other matters) informs an understanding of landscape character effects.

The appropriateness of the proposed Structure Plan's defensible edge treatments

Western Defensible Edge

- 5.6** Mr Espie describes the proposed western edge treatment as a 15m reserve buffer along the Domain Road frontage.¹⁵ Referencing Mr William's evidence, I note that the proposed Structure Plan¹⁶ anticipates:
- (a) A 5m width BRA/green buffer along the Streat Group site frontage (known as 'Domain Acres') at the northern end of Domain Road, where a change in zoning from Rural Residential to LDR is proposed (i.e. a change in density from 36 lots to some 119 lots¹⁷).
 - (b) A 15m width BRA/green buffer along the balance of the Domain Road frontage (excluding the triangular BRA/Reserve area) where LDSR zoning is also proposed.
 - (c) A pedestrian cycleway along the full length of the Domain Road frontage, regardless of the width of the BRA/green buffer. I note that a shared route of this type is usually around 3m wide.
- 5.7** This 'edge strategy' sits alongside a two-way, relatively narrow formed width of Domain Road. This Collector road displays a rural roading type character and is devoid of footpaths and lighting. Beyond this is a swathe of flat and open irrigated farmland extending between Domain Road and the Hāwea River corridor. A Wastewater Treatment Plant and Pump Station, together with the Hāwea Closed Landfill and Green Waste facilities, are located roughly opposite the triangular Reserve area approximately midway along the Domain Road frontage of the proposed Structure Plan area.

15 B Espie EiC, paragraph 29.

16 Refer T Williams evidence in general, and more specifically, the plan at Appendix [B].

17 QLDC s42A Report Settlement and Lower Density Suburban Residential Zones - Mapping, R Devlin: paragraph 25.4.

- 5.8** In my opinion, the proposed 15m width BRA/green buffer along this frontage would form a defensible edge. A landscape buffer of this scale would allow the sort of landscape treatments that deliver a successful urban boundary where there is no strong geomorphological ‘feature’¹⁸ evident, as is the case along Domain Road. For example, a buffer of this scale would allow a generous patterning of large-scale tree (and shrub) planting and naturalised mounding (should that be deemed appropriate), without compromising the capability to integrate a shared pedestrian/cyclist route.
- 5.9** In contrast, I consider that a 5m width BRA/green buffer incorporating an approximately 3m width shared pedestrian/cyclist route would not form a defensible edge due to the very limited depth of landscape treatment that would be possible alongside the shared path. (For example, only 1m width on either side of the path, or 2m width on one side of the path would be available for planting.)
- 5.10** Were such an outcome to occur, it is my expectation that the very flat and open nature of the adjoining farmland to the west of Domain Road could make it vulnerable to urban development creep, with the Hāwea River corridor being argued as the logical defensible edge for the settlement.

Southern Defensible Edge

- 5.11** The southern defensible edge comprises a 15m width BRA/green buffer adjoining (proposed) GIZ land. It is Mr Espie’s view that this buffer “could appropriately be a strong visual and experiential separation between GIZ and rural land; perhaps a densely vegetated or shelterbelt type treatment”.¹⁹
- 5.12** It is my understanding that the GIZ allows for 10m high buildings as a restricted discretionary activity, with matters of discretion including consideration of building appearance, landscape treatment, lighting and parking/loading areas etc.

18 For example: ridgelines, escarpments, watercourses, wetlands, large stands of bush.
19 B Espie EiC, paragraph 28.

- 5.13** Whilst a 15m width BRA/green buffer would allow a generous patterning of large-scale tree (and shrub) planting or shelterbelt type planting, together with naturalised mounding (should that be deemed appropriate), I question the reliance on a cadastral boundary, augmented by a 15m buffer, as a method to delineate a defensible urban edge in this location.
- 5.14** Relying on the analysis set out in my 2019 UGB Landscape Report, I consider that there are two logical options for a defensible edge along the south side of urban expansion throughout this side of Hāwea:
- (a) The water race that winds its way roughly through the centre of the site, augmented by a landscape buffer. This UGB delineation method combines a landscape buffer with a geomorphological (albeit man-made) boundary.
 - (b) Effectively, a ‘two-sided’ southern boundary that follows Domain Road along its southwestern edge and the Gladstone Gap flood hazard boundary along its south eastern side, with both edges being augmented by a landscape buffer. This UGB delineation method combines a landscape buffer with either an existing road or natural hazard boundary.
- 5.15** In my opinion, each of these defensible edge boundary methods are stronger than the method proposed in the Structure Plan (property boundary and landscape buffer).
- 5.16** Further, in my view, reliance on a relatively ‘artificial’ method to define a new UGB where there is a more logical option to the north or south runs counter to best practice landscape planning.
- 5.17** However, I acknowledge that if the Hearings Panel is minded to grant the rezoning that has been sought, the proposed 15m width BRA/green buffer along the southern side of the rezoning area would provide a defensible edge.

Eastern Defensible Edge

- 5.18** Mr Espies describes the proposed edge along the eastern side of the site at (his) paragraph 27. His eastern defensible edge relies, for the most part, on the adjacent Gladstone Gap flood hazard or property ownership boundaries. This includes both new LDSR and GIZ areas. The exception to this is a small section of 15m wide BRA/green buffer extending between the northern side of the proposed GIZ area and the water race.
- 5.19** In my opinion, whilst the Gladstone Gap flood hazard may preclude urban development creep east of the site, I consider that the treatment of this edge will give rise to adverse visual amenity and landscape effects, which I discuss shortly. (I explain my deliberate use of the term ‘may’ shortly.)
- 5.20** I also consider that the arrangement proposed by the Structure Plan in this regard would form a very abrupt urban edge along the majority of the eastern boundary, signalling a ‘tolerance’ or ‘appropriateness’ of such an urban edge outcome in the District.
- 5.21** In my opinion, this would be at odds with the characteristics of well-managed urban edges adjoining s7(c) landscapes, which are typically defined by landforms and/or a generous landscape buffer with fencing controls (to avoid urban style fences) that serve to limit the visual influence of the urban development on the neighbouring (rural) amenity landscape.²⁰
- 5.22** In addition, I have reviewed the Decisions Version of Chapter 27 Subdivision and Development. Subdivision in accordance with a Structure Plan is a controlled activity in the LDSR zone. I note that the matters for control (unsurprisingly) do not include effects on rural character, visual amenity or landscape character; and do not even mention landscape treatment. I consider that these are the sort of matters that would trigger careful consideration of this exposed edge as part of any future subdivision process.

20 For example, the edges of the settlement areas throughout the western end of Waiheke Island (Auckland), where a combination of ridgelines and large tracts of regenerating bush serve to limit the influence of the urban settlement (Oneroa) on the neighbouring s7(c) landscape (Matiatia, Owhanake, Church Bay etc).

- 5.23** For these reasons, I do not share Mr Espie's confidence that a future subdivision process will necessarily "bring about an appropriate zone edge"²¹ along the eastern side of the proposed Structure Plan area.
- 5.24** I also acknowledge that the consented SHA development does not incorporate a landscape buffer²² (or fencing controls) along its eastern edge. However, in my opinion, an inappropriate landscape outcome enabled by a previous process should not guide the parameters for future development.
- 5.25** On balancing these considerations, it is my opinion that the proposed Structure Plan will not secure an appropriate defensible edge along its eastern side and the northwestern edge (fronting Domain Acres), with a suboptimal outcome along its southern edge.
- 5.26** Further, in making these observations I note that the Structure Plan footprint (and indeed the consented SHA) appear to overlap the Gladstone Gap flood hazard mapping. Referencing the evidence of Mr Forrest it would appear that he does not see this as an impediment to urban development.²³ In my opinion, this casts doubt on the reliance of the Gladstone Gap flood hazard as an UGB delineation method.

The appropriateness of the proposed Structure Plan in relation to views and visual effects

- 5.27** I generally concur with Mr Espie's comments at (his) paragraphs 31 to 45 in relation to visual amenity effects, with the exception of views to the eastern side of the proposed Structure Plan area. Audiences exposed to this outlook include:
- (a) users of Gladstone Road (between Cemetery Road and Domain Road);
 - (b) users of the far eastern end of Domain Road;
 - (c) users of the eastern end of Cemetery Road and adjacent residential properties (on the north side of Cemetery Road);

21 B Espie EiC, paragraph 27.

22 I acknowledge that there is a requirement for rural style fencing to be retained along this edge.

23 P Forrest EiC, paragraphs 25-28.

- (d) users of the series of tracks throughout the Grandview Mountain range to the east (distant views only); and
- (e) the odd rural dwelling on the low-lying land flanking Gladstone Road to the east.
- 5.28** I acknowledge the change to the visual environment anticipated by the approved SHA, which will see the introduction of a reasonably dense line of two-storey dwellings along the northern end of the eastern Structure Plan boundary. As mentioned above, no specific planting treatment is proposed along this edge of the SHA; and absent landowners undertaking voluntary plantings, this edge of the consented development is likely to form an abrupt urban edge that is discordant with the open and spacious rural landscape alongside which it is viewed in these outlooks.
- 5.29** I consider such an outcome to comprise an adverse visual amenity effect for the more proximate audiences (i.e. excluding track users on the mountains to the east), with the magnitude of effect reducing with an increase in distance.
- 5.30** I also consider that this change in the visual environment will detract from the visual amenity values associated with the neighbouring amenity landscape. I consider that the extent of this negative influence will take in the flat and open rural land between the site and Gladstone Road where there are very few buildings.
- 5.31** However, consistent with my comments above in relation to the eastern edge treatment, I do not consider that the 'less than favourable' visual effects and visual amenity outcome associated with the SHA should form any sort of 'baseline' that enables further degradation of the quality of outlook for these audiences or the visual amenity values of the neighbouring amenity landscape.
- 5.32** In my opinion, the exposed nature of the majority of the proposed LDSR (8m high dwellings on 450m² - 300m² lots), and all of the proposed industrial development along the eastern side of the Structure Plan area, will read as an incongruous pattern alongside the flanking open rural landscape for these more proximate viewing

audiences. This outcome will also detract from the visual amenity values associated with the amenity landscape to the east, exerting a negative effect over the open and flat rural land extending to Gladstone Road and the eastern end of Domain Road. Whilst existing shelterbelt plantings will screen visibility of this side of the site in places, I note that this vegetation is not protected under the District Plan and could be removed as of right.

- 5.33** On balancing these considerations, I consider that the proposed Structure Plan will generate adverse visual effects for audiences proximate to the eastern boundary. The proposed Structure Plan will also detract from the visual amenity values associated with the open and flat rural landscape to the east and extending to Gladstone Road.

The appropriateness of the proposed Structure Plan in relation to landscape character

- 5.34** I query the utility of Mr Espie's discussion of landscape sensitivity at paragraph 20 of his evidence. In my experience of evaluating whether it is appropriate to upzone rural land, it is usual to determine the landscape sensitivity of the site and context. This is in contrast to Mr Espie's approach of framing the site's landscape sensitivity in comparative terms where he describes it as: "*considerably less sensitive to landscape change than the vast majority of locations within the rural parts of the District....*"
- 5.35** I confirm that, in my opinion (and relying on my detailed description of the area in the 2019 UGB Landscape Report), the landscape sensitivity of the site to urban change of the type contemplated by the proposed Structure Plan ranges from **very low** to **moderate-high** as one moves southwards across the site. This variance in landscape sensitivity is largely driven by the diminished influence of an urban development context, and the increasing impression of a rural landscape character as one moves southwards across the proposed rezoning area.
- 5.36** I also question the inference at Mr Espie's paragraph 21, that the factors he identifies in support of his landscape sensitivity comments (i.e. proximity to urban development, limited productive value,

(purported) colonial settlement history²⁴, absence of pastoral or picturesque aesthetics, separation of ONF/Ls and limited visibility), comprise some sort of ‘checklist’ that signals the appropriateness of a rural site for urban development in the Queenstown Lakes District.

- 5.37** I am not aware of such a method informing landscape assessment for the purposes of rural rezonings in the District (or anywhere else in New Zealand). Rather, ‘landscape appropriateness’ is determined on a case-by-case basis, informed by a thorough landscape assessment.
- 5.38** In my opinion, a significant gap in Mr Espie’s analysis of effects on landscape character is consideration of the effects of the proposed Structure Plan on the identity or ‘sense of place’ associated with Hāwea.²⁵
- 5.39** I acknowledge that the Rural Residential zoning of the Streat Group land together with the consented SHA signal an appreciable change to the landscape character throughout the northern portion of the site, which in turn will alter the character of the southern part of Hāwea. I also note that the more recent development throughout the relatively flat and low-lying land on the north side of Cemetery Road has seen a ‘breaching’ of the ‘old’ Hāwea settlement patterning that was historically defined by the moraine/shallow escarpment edge extending on a west – east alignment roughly through the centre of the (existing) township.
- 5.40** However, the proposed Structure Plan area covers approximately 140ha and amounts to a more than 60% increase in the footprint of the existing township (existing township footprint: 221ha).²⁶ Taking into account the nature of the Structure Plan that is proposed, I consider that the scale of this landscape change would advance the impression of Hāwea as a satellite town and move it further away from its identity as a somewhat sleepy, relatively small-scale and ‘old school’ New Zealand rural lakeside settlement.

24 Noting that Mr Espie’s opinion that “this type of land would have traditionally been settled in accordance with colonial settlement patterns” is not supported by historic mapping or expert historical evidence.

25 It should be noted that my 2019 UGB Report was solely focussed on evaluating the merits of a range of UGB configurations from a landscape perspective and did not address the landscape effects of urban expansion as such.

26 QLDC s42A Report Settlement and Lower Density Suburban Residential Zones - Mapping, R Devlin: paragraph 26.6.

- 5.41** I note that the Hāwea Community Association submission (**3287**) seeks the retention of the notified UGB (which excludes the proposed Structure Plan area), to preserve the special character of the lakeside settlement. I infer from this submission that the Community Association consider that the proposed Structure Plan would detract from the identity of their settlement which speaks to an adverse effect with aspects of landscape character that take in shared and recognised values and amenity values.
- 5.42** I also note that Mr Williams appears to have confused my 2019 UGB Landscape Report with a Landscape and Visual Effects Assessment Report. Mr Williams comments at (his) paragraph 88, that my ‘evidence’ confirms that the site has the capability to absorb change whilst maintaining the character of the wider landscape and amenity values; and again at (his) paragraph 105, where he considers that the 2019 UGB Landscape Report confirms that the site is suitable for urban expansion from a landscape perspective.
- 5.43** To be clear, my 2019 UGB Landscape Report simply considered options for an UGB throughout the southern side of Hāwea. This is a quite different exercise to assessing the appropriateness of an urban rezoning of rural land from a landscape perspective.
- 5.44** On balancing these considerations, and taking into account my analysis of the proposed edge treatments and visual effects, it is my opinion that the proposed zoning extension and Structure Plan is inappropriate from a landscape character perspective.
- 5.45** I also consider that the proposed zoning extension and Structure Plan will not maintain the landscape character and visual amenity values of the RCL area to the east of the site.
- 5.46** The inadequate edge treatment along the majority of the eastern boundary of the area proposed for urban zoning and the northwestern edge (Domain Acres) will, in my view, read as sprawling and incongruous development from the surrounding proximate rural area.

- 5.47** I am also of the view that the scale of expansion anticipated by the proposed rezoning runs counter to the perception of Hāwea as a relatively small-scale and ‘old school’ lakeside settlement, thus suggesting an outcome that is at odds with the policy approach of building on the historical settlement pattern.
- 5.48** However, it is also my opinion that the ‘horse has somewhat bolted’ in relation to a change in landscape character throughout the northern portion of the site, as a consequence of the character of development that is likely to occur at Domain Acres and throughout the consented SHA area.
- 5.49** Were the Panel minded to upzone land to the south of Hāwea, I set out below the parameters that I consider would guide an appropriate outcome from a landscape perspective.
- (a) Introducing a landscape buffer (15m width BRA/green buffer with a shared pedestrian/cycle route) along the full eastern edge.
 - (b) Aligning the southern limit to coincide with the water race that winds its way through the centre of the site, augmented with a landscape buffer (15m width BRA/green buffer with a shared pedestrian cycle route).
 - (c) Integrating a 15m wide landscape buffer (15m width BRA/green buffer with a shared pedestrian/cycle route) along the full length of the western boundary adjoining Domain Road.
- 5.50** In my opinion, upzoning to this extent and configuration strikes a balance between: making sense of the development that has been enabled south of Cemetery Road; achieving a robust defensible edge along the southern side of the Hāwea settlement; and limiting the expansion of the township to retain an impression of Hāwea as a small lakeside settlement.
- 5.51** This arrangement will also remedy the less than favourable eastern urban edge outcome associated with the consented SHA and

addresses the potential weakness of reliance on the Gladstone Gap flood hazard as an UGB delineation method.

- 5.52** I also consider that the overtly ‘organic’ southern edge that would form a part of this settlement expansion patterning is consistent with reinforcing the impression of Hāwea as an attractive and distinctive rural settlement.



Bridget Gilbert

12 June 2020