BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL INDEPENDENT HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Topic 12 The Queenstown Lakes District Proposed District Plan

---

STATEMENT OF LANDSCAPE EVIDENCE OF PADDY BAXTER ON BEHALF OF ALLENBY FARMS LIMITED (#502 AND #1254)

4 April 2017

---

baxter design

INTRODUCTION

Qualifications and experience

1. My full name is Patrick John Baxter. I am a Director of Baxter Design Group Ltd (BDG), a Queenstown based consultancy specialising in Landscape Architecture, Urban Design, Master-planning, Landscape Planning and Landscape Assessment. I hold the qualifications of Bachelor of Science and Diploma of Landscape Architecture. I am a registered member of the New Zealand Institute of Landscape Architects.

2. I have worked on master planned developments throughout New Zealand and Australia since 1989. I was Principal Landscape Architect with Boffa Miskell Partners from 1989 to 1998, based in Queenstown and working throughout the South Pacific. In 1998 I formed Baxter Brown Planning and Design and that was changed to Baxter Design Group in 2004. Baxter Design Group currently have 10 staff and are involved in projects of varying form and scale. My principal work and experience includes the design of master planned communities and developments on greenfield sites. I have worked on many sites described as 'sensitive' and in particular sites in Outstanding Natural Landscapes.

Involvement in project

3. I have worked on this project since November 2016 and am familiar with the subject site of the Allenby Farm District Plan Review submission rezoning proposal.

4. My role to date has included the recommendation of appropriate sites for housing, access patterns and layout, both walking and vehicular and the formation of controls that best respond to the site and protect and enhance its inherent landscape qualities. An integral part of the role is the formulation of appropriate design controls for this site.

Expert Witness Code of Conduct

5. I have been provided with a copy of the Code of Conduct for Expert Witnesses contained in the Environment Court's Consolidated Practice Note 2014. I have read and agree to comply with that Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Purpose and scope of evidence

6. My evidence describes the existing landscape character and values, describes the proposal and the design response and assesses the potential landscape effects of the proposal against the relevant matters of the Proposed District Plan.

7. In preparing this evidence I have reviewed the following:

(a) Allenby farms submission and further submissions of the DPR.

(b) Extracts from Helen Mellsop's landscape evidence dated 17 March 2014.

(c) Extracts from Dr Reid's landscape report to QLDC on appropriate landscape classification boundaries within the District dated 1 April 2014.

(d) Draft Expert evidence of Duncan White (planner) and Kelvin Lloyd (Ecologist)

ATTACHMENTS

The following Attachments form part of my evidence

Attachment A: Site Plan

Attachment B: Location and Photo Points Plan

Attachment C: Typical Building Platform Controls Summary

Attachment D: Andersons Ridge Photo

Attachment E: Wanaka Primary School Photo

Attachment F: Aubrey Road Photo 1

Attachment G: Aubrey Road Photo 2

Attachment H: Northlake Road Photo

Attachment I: Outlet Road Photo

Attachment J: Design Controls

EXECUTIVE SUMMARY

8. In my evidence I discuss the existing landform character, the location of the proposed building platforms, the design controls and the effectiveness of those controls in mitigating effects on the Outstanding Natural Feature.

9. The proposed design controls allow for building platforms of 1500m2 within which building footprints of a maximum of 500m2 may be located for the bulk of the proposed Building Platforms, with 275m2 building footprints on 3 specific Building Platforms. There are requirements for 400m2 of each Building Platform area to be revegetated in indigenous plantings from a prescribed species list.

10. Design Controls on dwellings are restrictive, above and beyond what is normally found in rural areas and rural lifestyle areas and includes a short palette of recessive claddings and colours on single storey buildings.

LANDSCAPE DESCRIPTION

Landscape Classification

11. Mt Iron has not been discussed in any Environment Court decisions and is not confirmed as an Outstanding Natural Feature (ONF) in the Operative District Plan (ODP). The northern flank of Mt Iron has a moderately high natural character embodied in its form and vegetative cover with a number of homes set amongst the Kanuka on the lower slopes. The remainder of Mt Iron has a high natural character. It is widely recognised as a valued landform within the context of the Upper Clutha Basin and its degree of naturalness and significance is similar to other landforms in the District that the Environment Court has found to be ONF's, including Roy's Peninsula, Slope Hill, Morven Hill and Queenstown Hill.

12. I agree with Mt Iron being classified as an ONF in the Proposed District Plan (PDP). I consider the appropriate landscape category for the Mt Iron landform is ONF on the basis that the mountain is a prominent and iconic landform with clearly legible formative process and high degree of natural character.

13. I note that this landscape category is relevant only to the portions of the landform which are within the PDP Rural zone, which includes the site.

Landscape Character

14. The Site occupies a 19.7ha, rectangular piece of land on the northwest facing slopes of Mount Iron in Wanaka (Attachment B). The Mount Iron landform is composed of two peaks; the higher more

southern peak being Mount Iron itself (548masl) which is connected to the lower more northern peak Little Mount Iron (507masl) by a shallow saddle.

15. The vegetation cover of the Mt Iron landform is predominantly a mix of indigenous grey shrubland, vegetation such as kanuka (*Kunzea ericoides*), matagouri (*Discaria toumatou*), mikimiki (*Coprosma propinqua*) and clumps of maidenhair vine (*Muehlenbeckia complexa*) and bush lawyer (*Rubus sp*.). There are also several introduced plant species onsite including briar rose, hawthorn and wilding conifers. Parts of Mt Iron are more characterised by the lack of vegetation, giving a more pastoral character. This creates an interplay of natural and pastoral elements.

16. The landform itself is a distinct Roche Moutonee feature with steep north and east faces and more subtle relieve on the south and western aspects. These less steep aspects host a series of formal and informal hiking and biking trails.

17. The Mt Iron landform is virtually surrounded by residential and commercial development. The Three Parks development is consented near the Mt's southern foot while residential parts of Albert Town extend to the Mt Iron's eastern foot. The less steep north faces are peppered with rural living type development which has occurred within the Kanuka scrubland. The foot of Mt Iron is not as well defined on its western slopes and residential development has occurred on the lesser graded west facing slopes.

18. Mt Iron has a mostly natural character embodied in its vegetative cover and landform. This ONF is ring-fenced by urban and peri -urban development.

DESCRIPTION OF THE PROPOSAL

19. The submission seeks a comprehensive proposal for the development of the wider Mt Iron and Little Mt Iron land currently owned by Allenby Farms. In short, the submission seeks a comprehensive solution to the management of the Mt Iron landscape. Included in the proposal are the consolidation of access rights, including the formalising of walkways over private land currently used by the public, the protection and enhancement of ecological values by way of management and revegetation, and the establishment of 12 new Building Platforms (BPs). I note that BPs 7, 9 and 14 (refer Attachment A) contain dwellings that already exist and that further development of those sites will be subject to the controls recommended in this proposal.

20. I note that the larger existing dwelling on existing Lot 1 is an established dwelling sitting within and adjacent to an established residential area and the effects of that dwelling are established and not subject to the assessment contained in my evidence.

The Proposed Building Platforms

21. By way of background, the proposed dwelling sites referred to in my evidence are described as Building Platforms. I note that, during the course of this evidence, I refer to BP's as opposed to Lots. Lots will be created for the purpose of subdivision, however those lot boundaries will be paper boundaries only as the lot boundaries will not be discernible on site unless where they may overlap with access boundaries. The effects of development, including dwellings, earthworks, domestic activities etc. are to be contained within the proposed BP areas described in my evidence.

22. The BP areas will be subject to controls described later in my evidence.

23. The proposed BPs sites are located on the northern slopes of Mt Iron (refer attachment A). The site plan shows 15 dwellings, 3 dwellings which are existing residential dwellings and 12 proposed building platforms. The dwelling on Lot 1 (DP62620) and referred to as Lot 14 on plans) is a substantial existing dwelling located on the western portions of the Site. BP 7 and BP 9 contain smaller residential structures.

24. Attachment A shows BPs 1-11 & 15 to be accessed from a private right of way from Rob Roy Lane to the west and BP 12 and 13 to be accessed from Hidden Hills Drive.

25. Fundamental to my evidence are the recommendations that I have made to Allenby Farms in regard to the controls and activities that may occur within those BPs, and the mitigation of effects that arise from those recommendations and the resulting assessment contained in my evidence.

26. I also note that, whilst I am cognisant of the wider submission, my evidence will focus on the area referred to as the proposed Mt Iron Park Rural Lifestyle Zone, a 19.7 ha area of land located within the northern portion of the site and shown in Attachment A.

The Design Vision and Process – Allenby Farms

27. The underlying vision for the development area at Allenby Farms relies primarily on the retention and enhancement of the existing bush pattern, being principally Kanuka. The intrusion of roading and settlement within the proposed Mt Iron Park Rural Lifestyle Zone will become a minor visible pattern within that wider framework. In effect, the intention is to develop a rural lifestyle development within that bush setting, a visible contrast to the contiguous traditional rural suburb that exists to the west, north and east of this land, in particular those dwellings located in the upper elevations of the Hidden Hills subdivision.

28. The design path started with onsite investigation; locating sites (Attachment A) which would be suitable for residential development by way of aspect, sense of place and location, and tempering that

with the restrictions of grade and other geotechnical realities. I was also cognisant of necessary drivers such as the avoidance of sites that may compromise the wider visibly perceived bush pattern.

29. The location of access roading and driveways to these BPs was derived from existing tracks and open space with driveway location located to minimise the loss of existing vegetation. Fundamental to roading placement is the requirement to locate roading where cut and earthworks are minimised. To that end, the location of roads is an important part of the design process. Roading does, wherever possible, follow natural contours. Matters to be considered in the design of appropriate roading include:

- The avoidance of large road batters and a requirement for the planting of all road batters in appropriate indigenous species.
- Road lighting to be kept to a minimum and only down lighting below 1.2 metres where required.
- Kerb and channel to be avoided and where required, to be a flush nib edge.

30. Following on from the above, the location of BPs allows for roading widths to be minimised. The intention here is for roading to be minor intrusions into the bush framework.

31. In general roading will be, where possible, of a domestic scale for the purpose of bookmarking entries to private dwellings located on each BP (refer Attachment A).

32. The form and layout of the BP's is a critical component of the overall recessive intent of the development (a typical BP layout is shown on my Attachment C). Fundamental to the success of the development is a contiguous and coherent set of restrictive design controls. The development of the BP controls has been worked through from simple conceptual beginnings. The overriding requirement is to set dwellings within a strong bush framework and I have attached a summary drawing of the proposed controls that will exist within a BP (Attachment C).

33. Specific lot sizes have not been considered in detail as these are of little relevance when considering lot sizes. The lot size is of little relevance as dwellings will be located on an area of approximately 1500m2 referred to as the Building Platform. All of the lot area outside that 1500m^2 is to be fully protected in its existing indigenous cover, to allow for the natural revegetation and spread of indigenous vegetation in those areas.

34. I have also recommend that fencing must be restricted to the Building Platforms only, if required for the purpose of pet or children containment, and that any fencing undertaken is in traditional post and wire fencing only, to 1 metre in height maximum, with rabbit netting if required. This will negate any

visible break in natural patterning that may occur from other fencing forms or scale in the existing vegetative pattern. To that end no fencing is allowed outside the BP.

35. The practicality of indigenous vegetation protection, management and regeneration is fundamental to the overall concept presented in the submission. Given that the protection of existing indigenous planting and the required plantings to be undertaken within BPs it is imperative that planting can be undertaken successfully.

36. To that I end I can confirm, from my experience as a landscape architect on the Northlake development to the north of this site, that there is no impediment to the growth rates of planting in this area and well planted and maintained plantings will achieve height very quickly. The plantings for example at the southern end of Northlake Drive on road reserve have grown very quickly over 3 summers with Kanuka reaching heights of 2-2.5m in that time and other indigenous species experiencing strong growth. I have also noted the strong growth rates of naturally occurring Kanuka seedlings on site.

37. All dwellings shall be located within BPs and shall not exceed a 500m^2 in footprint size for BPs 1-9 and 13-15, and 275m^2 for BPs 10, 11 and 12. The reasons for the specific heights are described later in my evidence. Within the BP areas there shall be a requirement for 400m^2 of indigenous revegetation to be undertaken using species from a specified list of species endemic to the area. The only the exception is areas of lawn and 20m^2 of planting permitted for the purpose of herbs and vegetable planting.

38. The remaining land is to be used for the purpose of access, parking, lawn and other residential amenity

39. The principal components of the design controls are:

- A contiguous and restrictive list of building claddings, enabling a consistent outcome in visible form. I consider that the colour of building claddings is the principal determinant of building visibility. I have recommended all dwellings are clad only in timber weatherboards, board and batten, steel, concrete or stone only and that all exterior claddings to be finished in dark, recessive colours only. From my experience, the cladding material is less important than the finished colour in regards to visual absorption into the surrounding landscape context. The roofing colour has only one option, being a deep dark grey and wall claddings are restricted to a similar colour range. The list of appropriate colours and finishes for the above materials is described in more detail in my Attachment K.

- Restrictions on the area of non-indigenous planting permitted.

- Lot owners to undertake indigenous planting within a BP, as discussed above; the intention being for lot owners to extend the indigenous planting around dwellings. It is noted that there is a Fire Service requirement for indigenous planting within 10 metres of any dwelling to be in green fleshy leaved plants for safety reasons.

- Common access and an overriding set of design controls.

40. The design controls also include building height restrictions. Dwellings in the lower elevations, shall have a permitted building height of up 4.5 metres in height. Dwellings on BP's 10-12 shall have a height limit of 3.8 metres. This is in response to potential visible impact from views described in my evidence and for the protection of skylines. I have also recommended that the roofs of dwellings on BPs 10-12 shall be generally flat, built to manufacturer's minimums. This is to avoid any potential glare that may occur from gabled roofing in the upper lots (Attachment J).

41. It is noted that the mature height of the predominant species on the site, being Kanuka, matches and exceeds the recommended maximum dwelling height.

42. Whilst I am generally satisfied that the colour and planting controls will satisfy mitigation concerns nevertheless I have recommended the restriction of a dwelling height at 3.8 metres on the higher BPs as an additional mitigation measure. This recommendation is to both negate skyline intrusion and to maximise visual absorption. Taking into account the distance of the views, the limited choices for wall and roof colour, the lower height of dwellings, the roof pitch control and the substantial revegetation programme proposed around dwellings, I am satisfied that the proposed dwellings will be very difficult to perceive from viewpoints outside the site described later in my evidence.

LANDSCAPE ASSESSMENT

Effects on Landscape Quality and Character

43. The proposed development is located on a northern flanks of Mt Iron. The northern flanks of Mt Iron are part of a larger legible glacial Roche Moutonee landform. That northern flank of Mt Iron is relatively undulating in character, with a continuous overlay of Kanuka forest over most of the site.

44. Within the proposed Zone boundary, the Building Platforms are located within distinct minor landforms on the site. Those landforms can be described as:

- BPs 1,2 and 14: Located on an existing lower terrace east of Bevan Place.

- BPs 3-19 and 15: Located on the hill flank, within a series of undulating contours, within largely open grassed areas within the existing Kanuka framework.
- BPs 10 and 11: Located on the upper portions of the site within areas largely covered by Kanuka.
- BPs 12 and 13: Located on the eastern portion of the site within a valley extending southeast, and rising, from the south end of Hidden Hills Road.

45. The existing Kanuka cover is natural and established and, to that end, forms the principal visible component of the existing physical attributes of the site, extending a cloak of vegetation over the bulk of the site. This is especially evident from views from the north, including views from Aubrey Road, Hidden Hills Road and roading north of Aubrey Road, including the established rural residential area accessed by Northburn Road and from future development in the area known as Northlake. The Northlake development is currently under construction.

46. Human influences in the form of dwellings, exotic plantings (both established mature and recent) and the general pattern of residential development flank the western and northern portions of the proposed development providing an established foreground to the development. From the northern views (Attachments F-I), the existing development occupies a substantial portion of the visible northern flanks of the hillside, covering the third to lower half of that visible landform's flanks. The upper portion of that landform remains largely covered in Kanuka, with smaller clearings visible but little evidence of human influence.

47. To the east of the site, the Hidden Hills development occupies a similar landscape aesthetic, but differs substantially by way of the dwellings and roading clearly visible amongst the Kanuka cover.

Visual Amenity

48. From northern views (Attachments F-I) the proposed building platforms on BP's 1-9 and 15 are largely screened from those northern views by a minor ridge and where visible, will not adversely affect the landscape quality and character from those views. The height controls and the recommended controls in regard to colours and cladding ensure that, where minor parts of the dwellings will be visible, the landscape quality will be not be diminished and the buildings will be reasonably difficult to see.

49. By way of comparison, a development with dwellings in similar scale form and colour to those found at Hidden Hills would be more visible. The recessive colour and height control, and the uniformity of those controls on this development, ensure that the development will be considerably more recessive than Hidden Hills when viewed from the adjoining roads and the degree of landscape quality and character remains intact.

50. The same can be said of views from the west towards BPs 1-9 and 15. From the lower existing development west of the site, around Cascade Drive, Rob Roy Lane and Bevan Place, there are only minor glimpses of the development. Moving west, towards the higher minor ridges in the areas of Andersons Road and Totara Tce, views towards the site are slightly elevated (Attachments D & E). The effects on landscape quality and character and visual amenity from those elevated residential areas are potentially more than northern views.

51. The recommended design controls acknowledge the potential effects on landscape quality and visual amenity from these western views and are stringent in regards to height and colour. To that end a proposed 4.5 metre height limit, together with recessive colours, will ensure that the proposal will not be visually prominent and will be absorbed within the surrounding cloak of Kanuka. The majority of these sites are located within localised undulations within the wider landform, with the existing Kanuka that surrounds these BPs providing partial screening.

52. The roading to BPs 1-9 and 15 is considered in the assessment. Often overlooked, the roading has the potential to be more visible than dwellings. In this case the roading utilises clearances largely existing on farm tracks. These are difficult to discern from the views described above and to that end, when completed, will offer minor glimpses only. Give the distances of those views I do not consider that they will have a more than minor effect.

53. In regard to general domestic effects I refer to the matters summarised in Attachment C. The recommended 400m2 site cover of indigenous plantings to be undertaken within each BP is a substantial amount of plantings. I consider that this further protects the visual amenity values of the development, avoiding the mixed exotic plantings found in the existing rural residential development south of Aubrey Road (Attachment H) and further assisting with screening and visual absorption.

54. Given the proposed controls, I do not consider that lighting will have an adverse effect on the visual amenity values of the landscape. All exterior lighting is to be downwards, not above 1.2 metres. In regards to lights from within dwellings, I do not consider this will adversely affect or change the wider night light experience on this site. Whilst this is an ONF, it is not a visually or physically isolated ONF and night views towards the site are always in the context of surrounding lighting, in both domestic and street lighting, in foreground and side views.

55. The location of proposed Building Platforms 10 and 11 are best described in the photographs on Attachments G, H and I. These proposed building platforms, given their location and elevation, have the potential for significant adverse effects if controls are not imposed. Potential effects of these 2 BPs is restricted to northern views, with potential visibility from the west screened by a minor ridge located west of these Building Platforms. Given their potential for adverse effects I have recommended specific design controls for development on these two sites. These controls include the restriction of

building footprints to 275m2, a maximum height of 3.8 metres and restrictive colour controls similar to the other BP's. These controls are recommended to reduce the scope of earthworks and clearance that may occur with building footprints up to 500m2 as permitted on the remaining BPs. Taking these controls into account, dwellings on those BPs will be below visible skyline and will be difficult to perceive. They will be small dark coloured buildings, within a heavily vegetated framework of existing Kanuka and revegetation.

56. Building Platforms 12 and 13 are located at the eastern end of the Proposed Mt Iron Zone. Their location is best described on my Attachment H. Both of these BPs will be accessed from Hidden Hills Road. Dwellings and all structures on these BPs will be subject to the same controls as recommended for BPs 1-9 and 15. As with development on other BPs, I consider the proposed design controls to be restrictive and above and beyond what is normally proposed in rural and rural lifestyle areas. Dwellings on both BP12 and BP 13 will be visible from the existing DOC / QLDC walking trail at varying degrees of visibility.

57. A dwelling on BP13 will be approximately 35 metres from the track set in an open area flanked by mature Kanuka. Walkers at this position are at the end (or beginning) of their track experience and established residential development on the Hidden Hills development is located close by and is visible. I have recommended that the building footprint on Lot 12 be restricted to 275m2, for reasons I have outlined for BPs 10 and 11. I consider this site to be at the edges of the ONF, given its proximity to existing residential development and consequently the effects on landscape quality and character are acceptable.

58. From further afield, in the vicinity of Aubrey Road and beyond, a dwelling on BP 13 will be largely screened from views by way of topography.

59. A dwelling on proposed BP 12 will sit within a dense framework of Kanuka, located approximately 25 metres above the track and approximately 45 metres from the track. The design controls will ensure that a dwelling on this site will be glimpsed through Kanuka from the track and more distant views but will not be distinctly visible given the recessive nature of the proposed controls. As with the other lots, the stringent controls proposed will minimise adverse effects, ensuring that the dwelling is visually absorbed into the landscape

CUMULANATIVE EFFECTS

60. I consider that the cumulative effects of dwellings on the proposed building platforms will be acceptable and will not degrade the landscape character of the landscape or the visual amenity

values. The northern flanks of the Mt Iron ONF are relatively unique, given the surrounding residential development that flanks the visible base and lower elevations of the landform, and the development on Hidden Hills at similar altitudes to that proposed.

61. I consider that the proposed development will have less of an adverse effect in terms of visible character, scale and form as compared to the established residential development of the Hidden Hills development, with the proposed deign controls promoting a contiguous pattern of single level dark coloured dwellings; an outcome that will protect the existing amenity of the landscape.

Dated this 04th day of April 2017

Paddy Baxter