



# **Queenstown Lakes District Proposed District Plan**

## **Section 32 Evaluation**

### **Variation to Proposed District Plan at Mt Iron**

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## 2. EXECUTIVE SUMMARY

2.1. The evaluation of this proposal under section 32 of the Resource Management Act (**'the Act'** or **'the RMA'**) supports amending the Proposed District Plan maps at Mt Iron in Wānaka in the following ways:

- a) amending the planning maps so that the zoning for all land within the Mt Iron Outstanding Natural Feature (**ONF**) is zoned Rural;
- b) making amendments to the position of the Wānaka Urban Growth Boundary (**UGB**) at two locations so it is located immediately to the outside of the Mt Iron ONF; and
- c) amending the location of the Mt Iron ONF line at 965 Aubrey Road and 705 Aubrey Road.

2.2. The purpose of the variation is to accurately identify all land that is part of the Mt Iron ONF as Rural Zone, and to classify that land on the Plan Maps as ONF, so as to achieve better alignment between the ONF, Significant Natural Areas (**SNA**) and zoning at Mt Iron ONF. The changes identified would not introduce any new objectives or change any existing objectives, but would make changes to planning maps<sup>1</sup>.

2.3. The key resource management issue being addressed in this section 32 evaluation is managing the use, development and protection of Mt Iron to provide for economic, social and cultural wellbeing and protection from inappropriate subdivision, use and development. This is implemented through the Proposed District Plan (**PDP**) in the strategic direction objectives and policies as they relate to landscapes and zoning.

2.4. This report assesses the variation in accordance with section 32 of the RMA. The evaluation considers the costs of removing the Lower Density Suburban Residential (**LDSR**) zoning and downzoning the land to Rural but concludes that the variation is considered to be the most appropriate way to achieve the purpose of the Act and the relevant objectives by better aligning land use controls with the categorisation of those part of Mt Iron identified as ONF.

## 3. INTRODUCTION

3.1. This section 32 evaluation considers the following amendments:

- (a) At 965 Aubrey Road (Lot 5 Deposited Plan 406222) move the ONF landscape boundary from the southern boundary of the property, and adjust it on the eastern boundary

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<sup>1</sup> The QLDC Proposed District Plan GIS Web Mapping Application

- (b) At 705 Aubrey Road (Lot 4 DP 471320) adjust the ONF landscape boundary on the eastern boundary
- (c) Rezone two slivers (**Area B and Area C, or collectively the Allenby Farm land**)<sup>2</sup> on the northwest side of the ONF line from Lower Density Suburban Residential (**LDSRZ**) to Rural Zone:
  - Area B is 6,400 square metres (approximately) and is a portion of Lot 2 DP 539413
  - Area C is 2,500 square metres (approximately) and is a portion of Lot 1 DP 539413
- (d) Realign the UGB so that it is located outside of the ONF line where they intersect at Mt Iron at two points:
  - Area B
  - Area C

3.2. Figure 1 below shows the broad context for the variation including the current zoning, UGB and ONF lines. Figure 2 below shows the proposed variation for the Allenby Farm Land. Figure 3 shows the proposed variation for the Aubrey Road properties. Appendix 1 shows the area in the context of greater Wānaka.

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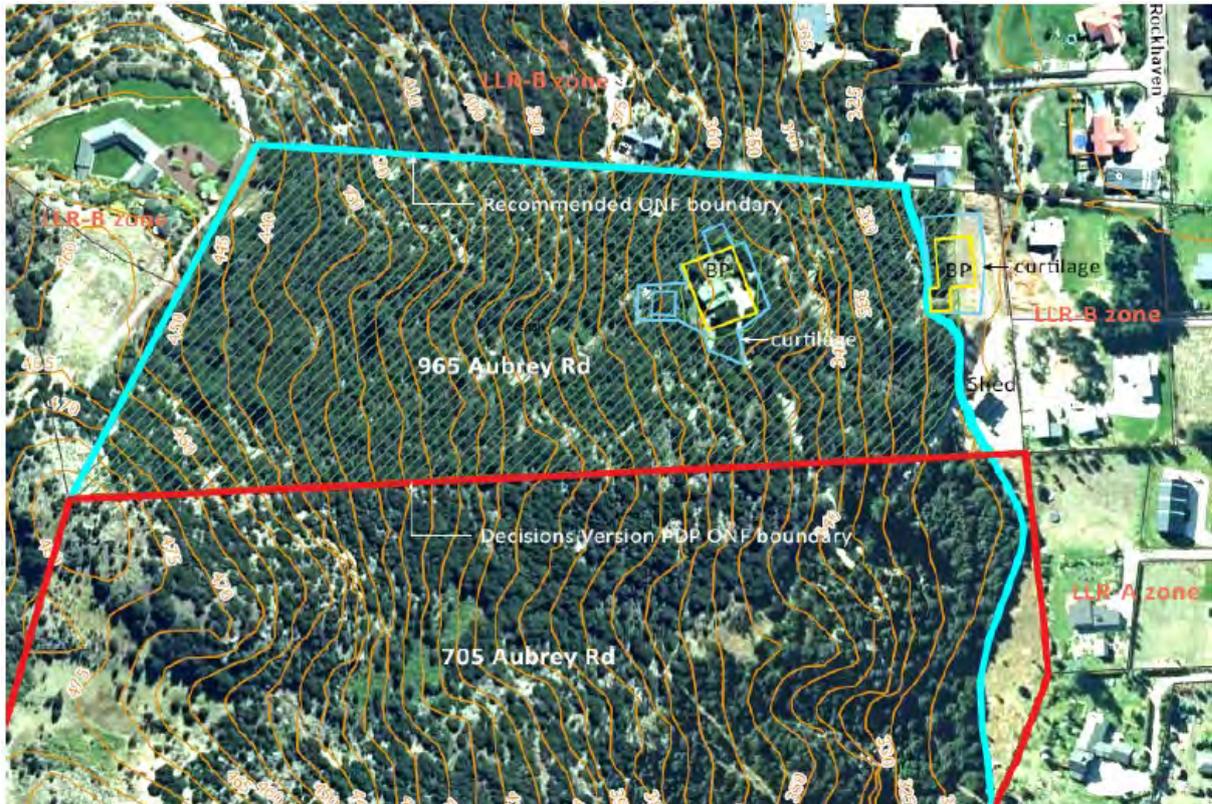
<sup>2</sup> Other recent documentation about these areas of land have used this terminology, so are being used again for the purposes of continuity. Area A is not included within this variation.



Figure 2 Allenby Farm Land - proposed variation. Snip taken from QLDC GIS PDP, Stage 1 and 2 decisions and 3 and 3b notified, July 2020.



Figure 3 Property at 965 Aubrey Road and 795 Aubrey Road showing the existing ONF boundary (red line) and the proposed ONF boundary (Blue line). Snip taken from Ms Helen Mellsop's Landscape Memo dated 15 May 2020 (Appendix 2).



#### 4. CONTEXT

4.1. Mt Iron is a unique location; it is described in landscape assessments as a classic *rôche moutonnée* (a rock formation created by the passing of a glacier over bedrock) and is a defining feature of the visual landscape of Wānaka<sup>3</sup>. The area is also a popular location for recreational walkers with five public access points and a network of trails that access a range of vantage points. The area is also notable for its indigenous biodiversity of *kānuka* woodland.

4.2. The Environment Court confirmed in a September 2019 interim decision, the location of the ONF at areas B and C in [2019] NZEnvC 160. This land is zoned LDSR in the notified and decisions version of the PDP and was zoned Low Density Residential in the previous Operative District Plan. The LDSR provisions do not manage the ONF resource so as to implement landscape policies in chapters 3 and 6 of the PDP and Part 2 of the RMA.

<sup>3</sup> Evidence in chief of Patrick Baxter, for Allenby, dated 30 November 2018. Paragraph 7

4.3. The property at 965 Aubrey Road is zoned Rural, and categorised as a RCL, however the correct landscape categorisation of the majority of this property is ONF.

## 5. STRUCTURE OF THE REPORT

5.1. This report provides an analysis of the policy response proposed by the variation as required by s32 of the RMA, using the following sections:

- a) **Consultation** undertaken, including engagement with iwi authorities on the proposal.
- b) An overview of the applicable **Statutory Policy Context**.
- c) A description of the **Resource Management Issue** being addressed by the proposal.
- d) An assessment of the **scale and significance** of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.
- e) An **Evaluation** against s32 of the RMA, including
  - Whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (Section 32(1)(a)).
  - Whether the provisions (policies and methods) are the most appropriate way to achieve the objectives of the proposal (Section 32(1)(b)), including:
    - (i) identifying other reasonably practicable options for achieving the objectives
    - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of risk of acting or not acting, and
    - (iii) summarising the reasons for deciding on the provisions.

## 6. CONSULTATION

6.1. The variation is considered to be discrete and the proposed changes affect only a small number of properties. Specific land owner consultation has been undertaken with the owners of 965 Aubrey Road, whereby the landowners were shown a copy of the Mellsop Landscape Report and have agreed to the proposed mapping amendments as they relate to their property. Allenby Farms were appellants to the aforementioned Environment Court appeal, and have been advised the Council are considering preparing a variation to rezone Areas B and C from LDSR to Rural zone. Further consultation can be undertaken prior to a decision on notification with Allenby Farms.

6.2. The zoning and mapping notations for this area were not submitted on by iwi representatives in Stage 1 of the review. The area is not encompassed within a Wāhi Tūpuna overlay. Because this is a mainly a matter of plan administration it may not be of significant interest to iwi.

## **7. STATUTORY POLICY CONTEXT**

### **The Resource Management Act**

7.1. The relevant requirements of the RMA include:

- (a) Section 5, which sets out the purpose of the Act *to promote the sustainable management of natural and physical resources;*
- (b) Section 6, which sets out the matters of national importance to be recognised and provided for through the Act, including
  - (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development*
  - (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:*
- (c) Section 7, which sets out other matters of particular regard, and for this variation of particular note:
  - (a) kaitiakitanga,*
  - (aa) the ethic of stewardship,*
  - (f) maintenance and enhancement of the quality of the environment*
  - (g) any finite characteristics of natural and physical resources*

### **The Local Government Act 2002**

7.2. The applicable requirements of the Local Government Act 2002 include:

- (a) Section 14, which sets out the principles relating to local authorities, and in particular (h)(ii) which states: *in taking a sustainable development approach, a local authority should take into account— the need to maintain and enhance the quality of the environment;*

***The Cry of the People, Te Tangi a Tauira: Ngāi Tahu ki Murihiku*** Natural Resource and Environmental Iwi Management Plan 2008 , and ***Kāi Tahu ki Otago*** Natural Resource Management Plan 2005

7.3. There are two iwi management plans that apply in the District, and they have been given appropriate regard in the preparation of this evaluation.

### **The Draft National Policy Statement for Indigenous Biodiversity**

7.4. The draft National Policy Statement on Indigenous Biodiversity (draft NPS IB) sets out requirements to manage natural and physical resources to maintain indigenous biodiversity under the Act. The draft NPS IB was notified in November 2019 and consultation closed on 14 March 2020. Appropriate regard has been given to the draft NPS IB in the formation of this variation.

7.5. Of particular relevance for this section 32, Section 3.6 of the draft NPS IB states:

*Local authorities must adopt a precautionary approach toward proposed activities where –*

- a) the effects on indigenous biodiversity are uncertain, unknown or little understood; but*
- b) those effects are potentially significantly adverse.*

### **The National Policy Statement for Urban Development Capacity and the National Policy Statement for Urban Development**

7.6. The National Policy Statement for Urban Development Capacity 2016 (NPS UDC) and the proposed National Policy Statement for Urban Development (NPS UD) require councils to provide sufficient development capacity to provide for urban growth over time.

7.7. Under the NPS UDC the District is considered a high growth location, and as such is required to have regard to all of its objectives and policies. Relevant objectives and policies are:

- (a) OA1: Effective and efficient urban environments that enable people and communities and future generations to provide for their social, economic, cultural and environmental wellbeing.*
- (b) OC2: Local authorities adapt and respond to evidence about urban development, market activity and the social, economic, cultural and environmental wellbeing of people and communities and future generations, in a timely way.*

7.8. Relevant policies under the NPS UDC require local authorities to monitor capacity against targets relative regularly, and enable further capacity where practicable:

- (a) PC4: A local authority shall consider all practicable options available to it to provide sufficient development capacity and enable development to meet demand in the short, medium and long term, including: a) Changes to plans and regional policy statements,*

*including to the zoning, objectives, policies, rules and overlays that apply in both existing urban environments and greenfield areas;*

- 7.9. The NPS UDC seeks to ensure that capacities for growth are appropriate over time, and requires high growth councils to monitor their feasibly zoned capacity. In response the QLDC prepared the QLDC 2018 Housing and Business Capacity Assessment (HBCA). The HBCA measured dwelling demand and capacity for current and future scenarios. The HBCA found that while overall housing capacity in the district is adequate, there is an undersupply of ‘affordable’ housing of approximately 5,200 dwellings, and an oversupply of more expensive dwellings<sup>4</sup>.
- 7.10. In June 2020 evidence for Stage 3 of the PDP was provided by economic expert Ms Natalie Hampson, who stated that the Council is adequately addressing capacities throughout the district, including the Upper Clutha, through the PDP process<sup>5</sup>. Her evidence found that the notified Settlement zones in the Upper Clutha (Albert Town and Hāwea) will increase the greenfield and infill capacity of the areas combined by 104%. The capacity is also anticipated to provide a range of densities and sizes, therefore contributing not only to overall supply, but also a variety of housing typologies.
- 7.11. The loss of plan-enabled capacity for the LDSRZ Allenby Farm Land within the UGB is estimated at around 6 dwellings. As the overall supply of housing in the district or the Upper Clutha has not been found to be lacking, this quantum of dwellings is unlikely to impact overall housing capacity. This is considered further section 11 of this report.

#### **Otago Regional Policy Statements – Operative and Proposed**

- 7.12. The relevant provisions of the Otago Regional Policy Statement has been considered in the preparation of this proposal.

#### **Proposed District Plan (PDP)**

- 7.13. The following chapters of the PDP are relevant and have been given due regard in the identification of resource management issues and evaluation.

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<sup>4</sup> <https://www.qldc.govt.nz/media/g1e15203/housing-capacity-assessment-2017.pdf> Summary

<sup>5</sup> Ms Hampson economic evidence Settlement Zone s32 – Appendix 4: <https://www.qldc.govt.nz/media/k2enpmes/pdp-s32-chapter-20-townships-appendix-4.pdf> (pg 15)

- (a) Urban Development - Chapter 4, which seeks to provide a framework for a managed approach to urban development that utilises land and resources in an efficient manner, and preserves and enhances natural amenity values.
- (b) Landscapes and Rural Character - Chapter 6, which seeks to manage actual and potential adverse effects of use and development on the District’s landscape values.
- (c) Lower Density Suburban Residential – Chapter 7, which seeks to provide zoning within urban growth boundaries that provides for traditional and modern suburban densities.
- (d) Rural – Chapter 21, which seeks to enable activities that rely on rural resources while protecting, maintaining and enhancing landscape values, ecosystem services, nature conservation values, the soil and water resource and rural amenity.
- (e) Subdivision and Development – Chapter 27, which supports the creation of new housing and land use opportunities through subdivision and the resultant development.
- (f) Indigenous Biodiversity Chapter 33, which seeks to protect, maintain or enhance indigenous vegetation.

7.14. The relevant objectives and policies by chapter of the PDP are laid out below.

<b>Chapter 3 – Strategic Direction Topic 2 Interim Decision version, July 2020</b>	
Strategic Purpose 3.1, issue 2	Strategic Issue 2: Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscapes, particularly its outstanding natural features and outstanding natural landscapes.
Strategic Purpose 3.1, issue 4	Some resources of the District’s natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District’s economy.
3.2.5.x	The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and landscape capacity are identified.
3.2.5.xx	Within the Rural Zone, new subdivision, use and development is inappropriate on Outstanding Natural Features or in Outstanding Natural Landscapes unless: <ul style="list-style-type: none"> <li>a. where the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are specified in Schedule 21.22, those values are protected;</li> <li>b. where the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are not specified in Schedule 21.22, the</li> </ul>

	values identified according to SP [x.x.x.y] [the intended new SP on assessment methodology] are protected.
3.3.30	Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.
3.3.30x	Avoid adverse effects on the landscape values of the District's Outstanding Natural Features and Outstanding Natural Landscapes from residential subdivision, use and development where there is little capacity to absorb change.

<b>Chapter 4 – Agreed appeals version <sup>6</sup></b>	
4.2.1	Urban Growth Boundaries used as a tool to manage the growth of larger urban areas within distinct and defensible urban edges.
4.2.1.4 c	Ensure Urban Growth Boundaries encompass a sufficient area consistent with: the constraints on development of the land such as its topography, its ecological, heritage, cultural or landscape significance; or the risk of natural hazards limiting the ability of the land to accommodate growth.
4.2.2 B	Urban development within Urban Growth Boundaries that maintains and enhances the environment and rural amenity and protects Outstanding Natural Landscapes and Outstanding Natural Features, and areas supporting significant indigenous flora and fauna. (From Policy 3.3.13, 3.3.17, 3.3.29)

<b>Chapter 6 - Landscapes and rural character appeals version July 2020</b>	
6.3.1.1	Classify the Rural Zoned landscapes in the District as: <ul style="list-style-type: none"> <li>a. Outstanding Natural Feature (ONF);</li> <li>b. Outstanding Natural Landscape (ONL);</li> <li>c. Rural Character Landscape</li> </ul>
6.3.3.1	Recognise that subdivision and development is inappropriate on Outstanding Natural Features and in Outstanding Natural Landscapes unless: <ul style="list-style-type: none"> <li>a. landscape values are protected; and</li> <li>b. in the case of any subsequent subdivision or development, all buildings and other structures and all changes to landform or other physical changes to the appearance of land will be reasonably difficult to see from beyond the boundary of the site in question.</li> </ul>
6.3.3.2	Ensure that the protection of Outstanding Natural Features and Outstanding Natural Landscapes includes recognition of any values relating to cultural and historic elements, geological features and matters of cultural and spiritual value to tangata whenua, including tōpuni and wahi tūpuna.

<sup>6</sup> An updated consent order version may replace this version if it is confirmed prior to notification

<b>Chapter 21</b>	
21.2.8	Subdivision, use and development in areas that are unsuitable due to identified constraints not addressed by other provisions of this Plan, is avoided, or the effects of those constraints are remedied or mitigated.

<b>Chapter 22</b>	
22.2.1	The District's landscape quality, character and amenity values are maintained and enhanced while enabling rural living opportunities in areas that can absorb development.
22.2.1.4	Manage anticipated activities that are located near Outstanding Natural Features and Outstanding Natural Landscapes so that they do not diminish the qualities of these landscapes and their importance as part of the District's landscapes.

<b>Chapter 33</b>	
<b>Plan Reference</b>	<b>Provision</b>
33.2.1.6	Manage the adverse effects of activities on indigenous biodiversity by: <ul style="list-style-type: none"> <li>a. avoiding adverse effects as far as practicable;</li> </ul>
33.2.2.1	Protect and enhance indigenous vegetation within scheduled Significant Natural Areas, and those other areas that meet the criteria in Policy 33.2.1.8, by ensuring: <ul style="list-style-type: none"> <li>a. indigenous biodiversity values that contribute to its significance are not reduced; and</li> <li>b. significant adverse effects on other values of the area or habitat are avoided.</li> </ul>
33.2.2.4	Recognise and encourage opportunities to protect and enhance the values of Significant Natural Areas.
33.2.2.5	Recognise the benefits of enabling access to Significant Natural Areas while maintaining, protecting or enhancing the values that contribute to their significance.

### Case law

7.15. Of particular relevance for this section 32 is the findings of the Court in *Man O'War Station Limited v Auckland Council [2017] NZCA 24* which determined that once a classification of ONL is established, planning controls should then support this classification (and by implication, that it is not correct to determine whether a landscape is ONL based on its planning framework). It

follows that a similar line of reasoning should also apply to determining planning approaches in ONFs such as Mt Iron<sup>7</sup> where the confirmation that the area is an ONF as a point of fact sets the frame for considering what the most appropriate zone and other plan provisions should be.

## 8. BACKGROUND

- 8.1. Mt Iron is adjoined by urban residential development in the form of a LDSR zone, a Large Lot Residential A zone and a Large Lot Residential B (LLR B) zone all of which are delineated from the Rural zoned land by the UGB.
- 8.2. The identification of ONF throughout the Queenstown Lakes District (the District) is an obligation under section 6 (b) of the RMA. The ONF at Mt Iron was established by Council based on information in the Read Landscapes Limited landscape boundaries report in 2014 for Stage 1 of the District Plan review<sup>8</sup>. The report noted that the form was an excellent example of a unique *rôuche moutonnée* landform, and is both “highly memorable and readily legible”.
- 8.3. There are three SNAs mapped on Mt Iron, shown on the Plan Maps. These were established through Stage One of the District Plan review, through a robust process of identification and inclusion<sup>9</sup> and determined to be significant in terms of Section 6(c) of the RMA.

Identifier	Site Name	Description/Dominant Indigenous vegetation
E18C	SNA C	Kānuka woodland
E18D	SNA D Sites 1 to 2	Kānuka woodland
E18G	SNA H	Kānuka woodland

### ***Allenby Farm Land – Area B and Area C***

- 8.4. **Area B and Area C** are two slivers of land located at the fringe of neighbourhood development where it meets the Mt Iron SNA, the Wānaka UGB, and the ONF. The urban zoning was rolled over from the ODP which zoned this area Low Density Residential. Although it was not the subject of a decision on matters raised specifically by submissions the urban zoning was retained in the Stage 1 PDP decisions and is now LDSR.

<sup>7</sup> <https://www.qldc.govt.nz/media/4dkpobwc/report-16-1-stream-12-upper-clutha-mapping-outstanding-natural-landscapes.pdf> from 1.3

<sup>8</sup> Read Landscapes Limited, 2014, p14-16. <https://www.qldc.govt.nz/media/4gfeovx/68-rea-1.pdf>

<sup>9</sup> <https://www.qldc.govt.nz/media/mzbl34o1/pdp-s32-chapter-33-indigenous-vegetation-aug-2015.pdf> from page 12

8.5. In the PDP Stage 1, Area B and Area C was included within the ONF<sup>10</sup>. This was subsequently challenged through appeals, and the Environment Court determined that Area B and Area C of the Allenby Farm land should remain within the ONF, reasoning that “an overriding consideration must be to ensure the overall legibility of the ONL or ONF is maintained”<sup>11</sup>.

### ***965 Aubrey Road and 705 Aubrey Road***

8.6. 965 Aubrey Road (LLR-B zone) and 705 Aubrey Road (Rural) are neighbouring properties located on the eastern slopes of Little Mt Iron. They are largely covered in kānuka with occasional exposed schist outcrops. At 965 Aubrey Road there is a building on the eastern portion of the site, and a large Rural-zoned site with an approved building platform to the south.

8.7. A landscape assessment has been completed by Ms Mellsoy for the property for this section 32 which recommends that the ONF line should encompass 965 Aubrey Road, and be adjusted at 705 Aubrey Road (**Appendix 2**). She notes in paragraph 11 that “the change in landform between the mountain toe slopes and the alluvial terrace is the appropriate and defensible boundary of the feature.” The recommended amendments to the ONF by Ms Mellsoy is included in **Figure 3**. No amendments to the zoning, the SNA or the UGB are recommended.

8.8. One of the outcomes of the Environment Court’s decisions affecting areas of ONF and ONL in the PDP is that planners and landscape architects have been directed to caucus on a “Values Identification Framework” for priority areas of ONF and ONL in the PDP. This framework will direct how the landscape values of ONF’s and ONL’s in priority areas are to be identified and described in the plan and this evaluation and scheduling will be implemented through a plan change process. Mt Iron will be part of this upcoming analysis of values and subsequent plan change that schedules these values. Any conclusions from this process should also be factored into the evaluation of any variation in this area. However, it is not recommended to wait for this process because:

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<sup>10</sup> Notified Stage 1 PDP Map 18 <https://www.qldc.govt.nz/media/rnilbirs/pdp-notified-map-18-wanaka-rural-hawea-flat-2015.pdf>

<sup>11</sup> The Court’s decision in Sub topic 1 of Topic 2 (rural landscapes) concerned the mapping of ONFs: 2019-nzenvc-160-topic-2 (paragraphs 63 and 237)

- a. the decision of the Court in relation to the Values Identification Framework has been clear that this process won't change established findings about the extent of areas that have been confirmed as ONF or ONL such as Mt Iron, and
- b. the scheduling of values and any plan change that alters potential development rights in this area coming out of this work programme will almost certainly involve further appeals and it may take years to arrive at a point where it provides any useful findings and direction.

## **9. RESOURCE MANAGEMENT ISSUE**

9.1. The key resource management issue being addressed in this section 32 evaluation is the protection of ONFs from inappropriate subdivision, use and development as required in Section 6(b) of the RMA. In the PDP this is addressed through the Strategic Direction objectives and policies that relate to landscapes and the mapping of an area of land located on the ONF as LDSR. This is articulated strategically in the PDP through Policy 6.3.3.1, *Recognise that subdivision and development is inappropriate on Outstanding Natural Features and in Outstanding Natural Landscapes unless:*

- a. landscape values are protected; and*
- b. in the case of any subsequent subdivision or development, all buildings and other structures and all changes to landform or other physical changes to the appearance of land will be reasonably difficult to see from beyond the boundary of the site in question.*

9.2. The issue can be described as follows:

**The appropriate extent of the ONF classification and the most appropriate zoning of the Mt Iron ONF**

9.3. The delineation of the extent of the ONF in the planning maps is the key method of protecting the nature and extent of a given landscape feature, this is considered in the PDP strategic purpose 3.1, issue 4 which states:

*Some resources of the District's natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District's economy.*

9.4. In the case of Mt Iron, expert evidence (appendix 2) and an Environment Court ruling<sup>12</sup> have combined to provide a credibly defensible ONF boundary as shown in figures 2 and 3.

9.5. Rural zoning limits the scope of subdivision and development. Policy 6.3.1 states:

*Classify the Rural Zoned landscapes in the District as:*

- a. *Outstanding Natural Feature (ONF);*
- b. *Outstanding Natural Landscape (ONL);*
- c. *Rural Character Landscape*

9.6. This policy implements the intention behind much of the Strategic Directions chapter 3 which seeks to find a balance between protecting the valued landscapes of the district, and addressing the need to accommodate urban growth over time.

9.7. The PDP uses zoning for land use and management of activities and is a fundamental method to achieve the strategic directions sought. The current LDSR zone enabled capacity for the Allenby Farm Land within the UGB under evaluation is estimated at around six dwellings based on a resource consent application<sup>13</sup>. The planning controls for the Rural zone are significantly more restrictive than LDSR. Under a Rural zoning any development would trigger a requirement for resource consent to establish building platform(s) with appropriate mitigating and landscape considerations (27.7.10). Subdivision of Rural land is a discretionary activity (27.5.12).

## **10. SCALE AND SIGNIFICANCE EVALUATION**

10.1. The level of detailed analysis in this evaluation is **moderate to high**, to reflect the scale and significance of the effects of the proposed mapping variations. The amendments would apply to four properties, the land owners of approximately twenty five existing residential properties in the immediate vicinity are considered to be directly affected by the proposal.

10.2. The purpose of the RMA clearly identifies the protection of outstanding natural features from inappropriate subdivision, use, and development as a matter of national importance. The role

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<sup>12</sup> 2019 NZEnvC 160

<sup>13</sup> Based on resource consent application RM191242 - Allenby Farms Limited - Subdivision Consent To Create 6 Lots With Associated Earthworks At Rob Roy Lane, Wanaka

of Mt Iron as a notable and cherished feature of the Wānaka environment is another important consideration. It is also important that the UGB is aligned with the landscape protections afforded by the ONF. A number of views from adjoining neighbours and from the popular trail routes on Mt Iron are likely to be adversely affected by suburban development within areas B and C. Potential adverse effects on the appreciation of the ONF from wider afield are also important.

## **11. EVALUATION OF OPTIONS**

11.1. Section 32(1)(a) requires an examination of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act. This variation does not propose any new objectives or changes to existing objectives. In this case, an examination of the extent to which the purpose of the proposal is the most appropriate way to achieve the purpose of the Act is required (s32(6)).

## **12. EVALUATION OF THE PROPOSED METHOD**

12.1. Section 32(1)(b) of the Act requires an assessment of whether the proposed method is the most appropriate way to achieve the objective or purpose of the proposal. This assessment must:

- (a) identify other reasonably practicable options for achieving the objectives (S32(1)(b));
- (b) assess the efficiency and effectiveness of the provisions in achieving the objectives (S32(1)(b)(ii)), including consideration of the benefits and costs anticipated from the implementation of the provisions, identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions (S32(2)(a)), including opportunities for (i) economic growth that are anticipated to be provided or reduced, and (ii) employment that are anticipated to be provided or reduced, and if practicable quantify the benefits and costs (S32(2)(b)), and assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions (S32(2)(c)); and summarise the reasons for deciding on the provisions (S32(1)(b)(iii)),

12.2. Section 32(3) requires that if the proposal is an amending proposal that will amend a plan that is already proposed, the examination under subsection (1)(b) must relate to:

- (a) the provisions and objectives of the amending proposal; and
- (b) the objectives of the existing proposal to the extent that those objectives—

- (i) are relevant to the objectives of the amending proposal; and
- (ii) would remain if the amending proposal were to take effect.

**Reasonably practicable options**

12.3. The broad options to address the resource management issue identified are:

Option 1 - Status quo – no change to UGB, ONF or zoning

Option 2 – At the Allenby Farms land change the zoning to rural and align the UGB with the ONF as shown in figure 2, and make no changes to the ONF at the Aubrey Road properties.

Option 3 – Make no changes at the Allenby Farms land, and amend the ONF at the Aubrey Road properties as shown in figure 3.

Option 4 - Amend the zoning, ONF and the UGB at both the Allenby Farm Land and the Aubrey Road properties as shown in figures 2 and 3.

Option	Most appropriate way to achieve the purpose of the proposal?
<p>1. Status quo – no change to UGB, ONF or zoning at specified locations</p>	<p>The ONF status of residential land adjacent to Mt Iron (the Allenby Farm Land) and at (for 965 Aubrey Rd and 705 Aubrey Rd, see appendix 2) has been confirmed through expert reports and by the EC decision. This confirmation needs to be followed by consideration of the appropriate planning provisions in light of that key finding.</p> <p>The relevant objectives and policies in the strategic directions and landscapes chapter clearly indicate that protection of the ONF from the effects of inappropriate subdivision and development, in particular Strategic Objectives 3.2.5.x, 3.2.5.xx<sup>14</sup> and Chapter 6 Policy 6.3.1.1 and 6.3.3.2<sup>15</sup>. LDSR zoning comes with a purpose, objectives and rules package which enables and promotes urban development and retaining this zoning will create a conflict with the strategic direction setting provisions of the plan relating to the ONF and UGB.</p> <p>The status quo would provide a set of potential development opportunities to the owners of land in the sliver areas (B and C) which if realised would accrue significant economic benefits to these persons and make the use and enjoyment of this land for urban purposes more streamlined and efficient.</p> <p>However, it would not deliver the level of protection required to give effect to the purpose of the Act in relation to a section 6 matter of national importance</p>

<sup>14</sup>Chapter 3 Strategic Direction appeals version July 2020

<sup>15</sup>Chapter 6 Landscapes and rural character appeals version July 2020

	<p>and the strategic objectives and policies determined through previous stages of the PDP for the ONF and SNA under consideration which, following the Man-o-war principles is a decision makers first and principle concern.</p> <p>For the above reasons, retaining the status quo would not achieve the purpose of the Act and would be contrary to the overall strategy for resource management set out in the PDP.</p>
<p>2. At the Allenby Farms land change the zoning to Rural and align the UGB with the ONF as shown in figure 2, and make no changes to the ONF at the Aubrey Road properties.</p>	<p>This option would involve rezoning the slivers of LDSR land to Rural which would deliver the outcomes sought through chapters 3 and 6 through an increased level of protection for the ONF. This option would go some way to achieve the strategic objectives protecting the ONF, but excluding the Aubrey road property ONF boundaries would not honour the full extent of the ONF as defined by expert evidence.</p> <p>This option would place the overall legibility of the ONF at risk and could lead to adverse effects on the protected Mt Iron landscape.</p> <p>Considering only one aspect of the ONF protection (namely the Allenby Farms land considerations) alone would not achieve the purpose of the Act.</p>
<p>3. Make no changes at the Allenby Farms land, and amend the ONF at the Aubrey Road properties as shown in figure 3.</p>	<p>This option would involve retaining the UGB and zoning at the Allenby Farm land. This option would lead to uncertainty about future development in relation to the ONF line.</p> <p>It would fail to give effect to chapter 3 strategic purpose 3.1 issue 4 which requires effective identification and protection of landscapes, and ONFs.</p> <p>It would fail to give effect to chapter 4 Urban Development and Chapter 6 Landscape – rural character, which seeks clarity about the protection of ONLs and ONFs and for enabling development opportunities in particular situations. This is exemplified in 4.2.1 which seeks distinct and defendable urban edges. It would also run counter to <i>Man of War</i>.</p> <p>Further, similar to option 2 above, considering only one aspect of the ONF protection (namely the Aubrey Road considerations) alone would not achieve the purpose of the Act.</p>
<p>4. Amend the zoning, ONF and the UGB at both the Allenby Farm Land and the Aubrey Road properties as shown in figures 2 and 3.</p>	<p>This option would deliver the outcomes sought by chapters 3 and 6, and higher order documents, and also case law protecting landscapes such as <i>Man of War</i>. It would confirm the direction set through EC decisions, and it is anticipated to have a minor effect on the development capacities of the Upper Clutha. In particular it will confirm the direction set by 3.3.30.</p> <p>Downzoning the slivers at Areas B and C will impact on the ongoing use and enjoyment of this land for urban purposes as set out in the LDSR chapter. If</p>

	<p>Area B were to be consented for subdivision and development under its current zoning while the variation proceeds this will set up a mismatch between the zoning of the land and its consented use. A range of activities such as buildings will require consents which could be notified and imposes considerable transaction costs for everyday development by dint of it being located on Rural zoned land in an ONF. This impact on future development opportunities may not be significant if no development occurs in areas B and C before the variation takes legal effect.</p> <p>In relation to 965 Aubrey Road and 705 Aubrey Road the strong protections established through the SNA on this land make it clear that this option is the preferred method for achieving the purposes of the Act and the strategic chapters of the PDP.</p> <p>The UGB and the ONF aligned will provide clarity regarding the appropriate use of the land on the sites. This will be reinforced by zoning that is appropriate for the level of protection intended through the ONF (i.e. by applying the Rural Zone).</p> <p>The Improved implementation of planning controls will lead to the PDP better achieving section 7(f) and (g) of the RMA in terms of the maintenance and enhancement of the finite natural resources of the environment.</p>
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12.4. Having considered these options, **Option 4** is preferred.

**Efficiency and effectiveness**

The following table considers the costs, benefits, efficiency and effectiveness of the preferred option.

<b>Purpose of the proposal: to consider the consistency of the ONF, SNA and zoning at Mt Iron ONF</b>		
<b>Preferred Option: Option 4, which will:</b>		
<p>(a) <b>At 965 Aubrey Road and 705 Aubrey Road, make adjustments to the ONF on their eastern boundaries</b></p> <p>(b) <b>Rezone two slivers (Area B and Area C, or collectively the Allenby Farm land) on the northwest side of the ONF line Rural Zone:</b></p> <p>(c) <b>Realign the UGB so that it is located immediately outside of the ONF line where they intersect at Mt Iron at two points:</b></p> <ul style="list-style-type: none"> <li>• <b>Area B</b></li> <li>• <b>Area C</b></li> </ul>		
<b>Costs</b>	<b>Benefits</b>	<b>Efficiency &amp; Effectiveness</b>
<p>There is a possibility of the loss of development capacity for the district.</p> <p>The current plan-enabled capacity for the LDSRZ Allenby Farm Land within the UGB which is approximately six dwellings, based on a recent resource consent application for Area B. Area B has a current capital value of \$800,000.</p> <p>Area C is part of Allenby Farms and as it is less than 15m wide over its entire length it appears to be impractical to develop in its own right. Area C therefore has no development capacity of its own but could add to the development potential of the LDSR sites that adjoin its western boundary.</p>	<p>Consistent protection of the Mt Iron ONF, around its perimeter securing the ongoing enjoyment of an important landscape feature of the Upper Clutha</p> <p>Greater certainty for landowners and the community on development rights.</p> <p>Clearly defined urban edge through logical and consistent alignment of the UGB and ONF lines.</p> <p>Greater consistency between the existing landscape policies and urban development policies of the PDP.</p>	<p>The proposed changes are considered to be efficient because the benefits would outweigh the costs. All resource management decisions impose potential economic losses and gains and these matters are not overriding considerations.</p> <p>The ongoing and consistent protection of one of the most significant landscape features in the greater Wānaka area is achieved through the alignment of zoning with the ONF.</p> <p>In addition, aligning the UGB and ONF lines is an effective planning approach delivering clarity for community and landowners alike on where urban development is likely to be considered appropriate or inappropriate.</p> <p>Overall, the proposal is considered to be the most appropriate way to achieve the purpose of the Act and the Strategic provisions of the PDP.</p>

<p>The overall supply of housing in the district or the Upper Clutha has not been found to be lacking, this quantum of dwellings is unlikely to impact overall housing capacity<sup>16</sup>.</p> <p>The average house values for the neighbourhood block immediately adjacent to Areas B and C is \$975,000, well beyond what could be considered affordable<sup>17</sup>.</p> <p>Any housing gain in Areas B and C under present zoning is likely to be in the mid to upper range of the housing market, a part of the market which is not considered to be undersupplied. High levels of consenting costs are could be incurred with any redevelopment of sites in Area B as a result of</p> <p>It is not certain that subdivision consent in area B will be realised but there is a potentially significant economic loss for Allenby Farms from the downzoning of a portion of their land holdings to Rural land within the ONF.</p>		
<p>Opportunities for economic growth that are anticipated to be provided or reduced; and employment that are anticipated to be provided or reduced (S32(2)(a)(i-ii))</p>		
<p>As noted above, there is some loss of housing capacity and the associated productivity that could</p>	<p>Economic growth benefits are derived from the protection of an ONF for which the district is celebrated.</p>	

<sup>16</sup> Ms Hampson economic evidence Settlement Zone s32 – Appendix 4: <https://www.qldc.govt.nz/media/k2enpmes/pdp-s32-chapter-20-townships-appendix-4.pdf> (pg 15)

<sup>17</sup> Based on data taken from QLDC capital value rating data

<p>be yielded from development on the sites proposed to be down-zoned to Rural.</p> <p>There could be a flow on effect to the Allenby Farms business and employment through opportunity cost. However, it is likely that Areas B and C have always been considered a less likely development opportunity given their landscape and planning control challenges.</p>	<p>Clearly defined edges for development at Mt Iron would ensure the ongoing protection of the economic resource the feature provides.</p>	
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12.5. Section 32(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. It is considered that, in this case, the information is certain and sufficient, and there is no need to assess the risk of acting or not acting, particularly in the context of the relatively low scale and significance of the proposal.

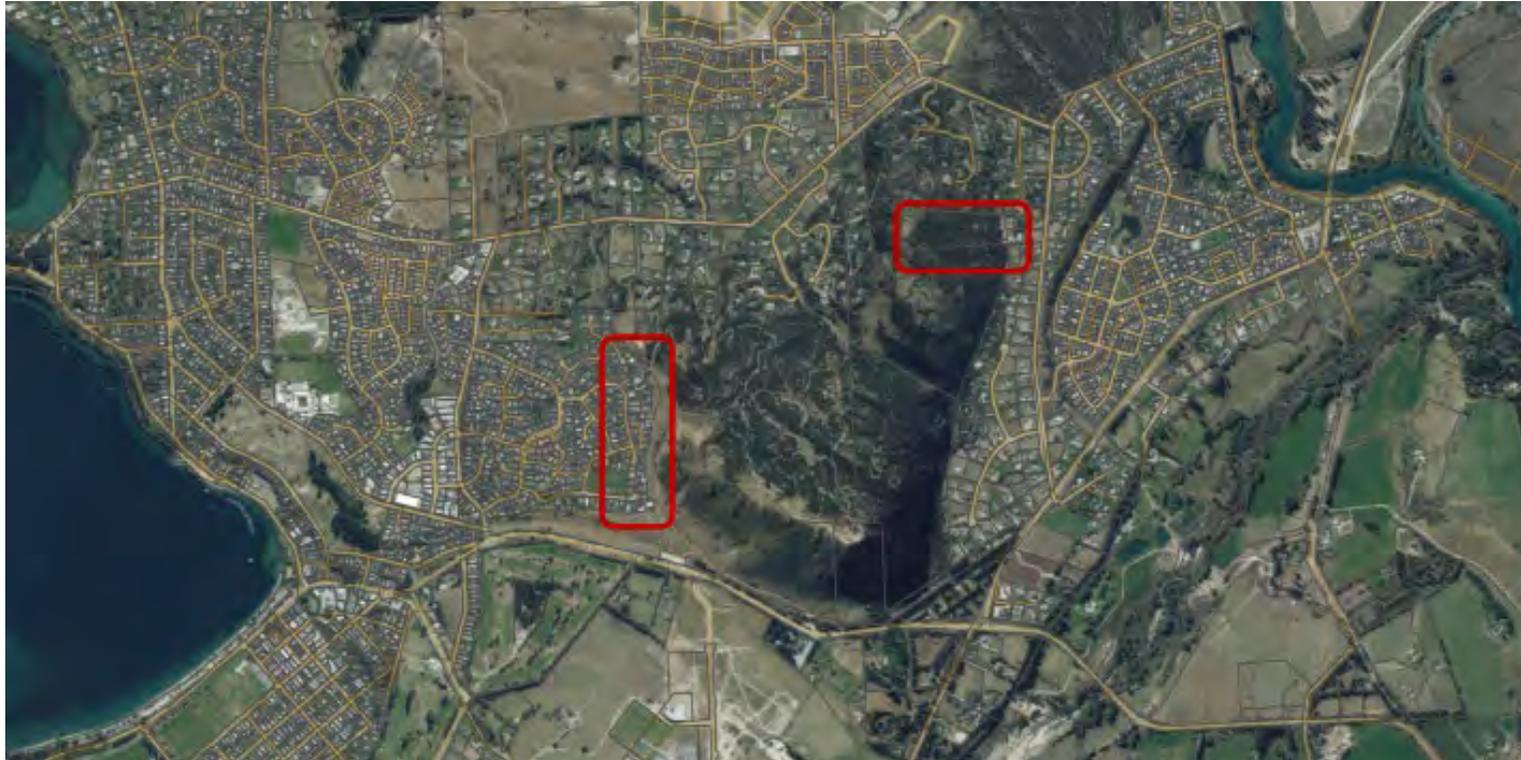
#### Reasons for deciding on the mapping variations

12.6. The proposed amendments to the planning maps are considered the most appropriate to achieve ***the consistency of the ONF, SNA and zoning at Mt Iron ONF.***

- a) The amendments do not result in efficiencies for the landowners (i.e. both Allenby Farms, and 965 Aubrey Road) in terms of section 7(b) of the RMA. However the costs are outweighed by the direction under section 6(b) to protect ONFs from inappropriate subdivision use and development.
- b) The changes give effect to the relevant Strategic Direction objectives and policies of the Proposed District Plan, in particular the protection of ONFs.
- c) They are in accordance with the functions of territorial authorities in s31 of the RMA and the sustainable management purpose of Part 2 of the RMA.

**APPENDIX 1**

**Wānaka context**



*Map of Wānaka, snip taken from QLDC GIS June 2020*

**APPENDIX 2**

**Outstanding Natural Feature Boundary at 965 Aubrey Road, Helen Mellsoy, 15 May 2020.**

# Memo

**TO:** Craig Barr – Principal, Resource Management Policy, QLDC

**FROM:** Helen Mellisop – Registered NZILA Landscape Architect

**DATE:** 15 May 2020

**SUBJECT:** Outstanding Natural Feature boundary at 965 Aubrey Road

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## INTRODUCTION

1. The Mount Iron *r*oches moutonn

feature in Wanaka was identified as an Outstanding Natural Feature (ONF) in the Read Landscapes Limited landscape boundaries report<sup>1</sup> undertaken in 2014 to inform the location of Outstanding Natural Features (ONF) and Outstanding Natural Landscapes (ONL) for inclusion in the Queenstown Lakes Proposed District Plan (PDP). The August 2015 notified PDP identified all Rural Zoned land on Mt Iron as an ONF, with the exception of the property at 965 Aubrey Road that was identified as rural landscape character, the categorisation afforded to section 7(c) amenity landscapes. No submissions were received on the Mt Iron ONF boundary at this location and the notified ONF boundary was included in the decisions on submission version of the PDP in May 2018.

2. In my evidence on submissions to the notified PDP<sup>2</sup>, I noted my understanding that the property at 965 Aubrey Road had been excluded from the Mount Iron ONF as a result of a map drafting error. The text of the Read landscape boundaries report<sup>3</sup> makes it clear that the ONF should have included all land on Mount Iron that was zoned Rural General in the Operative District Plan. This zoning included 965 Aubrey Road. Although I recommended that the ONF boundary

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<sup>1</sup> Read Landscapes Limited. 'Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features' 2014, p14-16.

<sup>2</sup> Evidence of Helen Juliet Mellisop on behalf of QLDC - Landscape. 17 March 2017. Rezoning Hearing Stream 12 (Upper Clutha mapping), paragraph 7.75.

<sup>3</sup> Ibid, p15.

be modified to be consistent with the text of the boundaries report, no submission had sought such a change and there was consequently no scope for the boundary relocation.

3. QLDC is now considering a variation to the PDP to address anomalies in the boundaries of the Mount Iron ONF. I have been engaged to undertake a landscape assessment of the appropriate ONF boundary in the vicinity of 965 Aubrey Road (Lot 5 Deposited Plan 406222).

## LANDSCAPE ASSESSMENT

### Mount iron landscape attributes and values

4. I described the landscape attributes and values of Mount Iron in my evidence on the Allenby Farms Limited appeal (ENV-2018-CHC-148-004) to the PDP<sup>4</sup>:

#### Landscape attributes

*Mount Iron and Little Mount Iron (subsequently referred to together as Mount Iron) is a classic roche moutonnée – a landform created by the passage of glacier ice over bedrock. The 'upstream' side of the landform is generally smooth and eroded, while the 'downstream' side is steep, rough and craggy. It is listed in the NZ Geopreservation Inventory for the Otago region.*

*Much of the mountain is covered with regenerating kānuka woodland and grey shrubland and large areas of this vegetation have been identified as Significant Natural Areas. On the steep southern and eastern slopes, regenerating vegetation is protected within a DOC conservation reserve. Some open pastoral areas are present on the western side and the rocky cliffs on the southern side do not support any tall vegetation.*

*Mount Iron is a prominent landmark within the Upper Clutha Basin and a very popular walking destination and lookout for locals and visitors alike. A number of walking tracks criss-cross the landform, allowing access from SH84 and surrounding urban areas, and panoramic views of Lake Wanaka and the Upper Clutha Basin are available from the summit.*

*. . . suburban development has already extended up the gentler north-western 'upstream' side. There is also rural residential development on the steeper northern slopes, although this is visually integrated to some extent by retained kānuka forest.*

#### Landscape values

*In my view, while this urban and rural residential development has resulted in adverse effects on the natural character, visual coherence and legibility of the landform, the feature retains sufficient*

<sup>4</sup> Evidence of Helen Juliet Mellsoy – Landscape, paragraphs 11.2-11.7

naturalness and outstanding qualities to be classified as an ONF. In my view the key values that lead to this classification are:

- (a) **Very high biophysical values**, as a prominent and well preserved example of a typical *rôche moutonnée* and as a result of the significant areas of indigenous vegetation;
- (b) **Very high legibility/expressiveness values**, as a consequence of the legible formative processes and exposed schist cliffs;
- (c) **High naturalness values** despite the presence of residential development, mainly as a result of the extent of retained indigenous vegetation and the largely unmodified nature of the upper slopes;
- (d) **Very high aesthetic values**, as a consequence of its prominence, memorability and high degree of contrast with surrounding urban areas;
- (e) **High experiential values**, resulting from the ability to access many parts of the landform on foot; and
- (f) **Very high shared and recognised values**, forming an important part of the identity and sense of place of Wanaka and a very popular tourist destination.

Other values include low transient values (represented mainly by the presence of wildlife) and low values related to tranquillity and wildness (as a result of the location in an urban area and the frequency of visitors on the tracks).

5. The decision on the Allenby Farms Limited appeal included additional information on the attributes of the ONF<sup>5</sup>, provided in the evidence of Ms Anne Steven. I concur with her description of these attributes:

Biophysical

- classic, large *rôche moutonnée* landform (ice-sculpted schist bedrock with moraine veneer in places); an extremely well-defined landform of scientific/educational value; displays the typical gentler sloping and smoother uphill side and a steep downstream side;
- extensive *kānuka* woodland cover, mixed with grey shrubland in places and a few areas of short tussock grassland and cushionfield/herbfield (albeit severely degraded due to rabbit pressure);
- Some of the best examples of *rôche moutonnée* habitats within the Pisa Ecological District, with a moderate diversity of habitats and moderate species richness of birds and plants;
- Contains species that are threatened (*Acaena rorida*, *Pimelia sericeovillosa*) or At Risk of Declining (*Discaria toumatou* (Matagouri) and *Carmichaelia petriei* (desert broom));

<sup>5</sup> Decision No. [2019] NZEnvC 160, paragraph 186.

- *The mountain provides habitat for Brown Creeper, a small passerine bird and therefore also supports NZ Falcon populations, a Threatened-Nationally Vulnerable species, and native lizards. Indigenous fauna are protected;*
- *The site is relatively large and compact and thus is conducive to ecological values being self-sustained and is an important component of a network of sites in the vicinity of the Upper Clutha River that support indigenous scrub and shrubland habitat;*
- *Coprosma scrub and shrubland on the shady south-facing slopes of the site have excellent potential for ecological restoration into indigenous forest;*
- *Overall, the site does support significant indigenous vegetation and significant habitats of indigenous fauna. A key attribute of the site is the gradient of indigenous woody vegetation from relatively moist shady habitat on the south-facing slopes to dry sunny habitat on north-facing slopes.*

#### Perceptual

- *Highly visible, prominent and isolated distinctive landform with a high degree of legibility and strong visual contrast with surrounding landscape, imparting high aesthetic values and strong contributor to sense of place for Wanaka;*
- *Highly natural character overall with some more modified areas containing tracks, roading, buildings and structures within a kanuka/grey shrubland matrix.*
- *Early summer (December) mass kanuka flowering is a notable transient effect, reminiscent of a dusting of snow, as well as the pass effects of light and shade.*

#### Associative

- *Very high degree of shared values in a visual and recreational sense, supporting one of Wanaka's most heavily used walking tracks.*
- *Key feature in everyday life of Wanaka residents and widely visible from surrounding township areas; backdrop to residential areas.*
- *Key element contributing to the place of Wanaka and Albert Town.*
- *Large proportion of the mountain is proposed as Significant Natural Areas ('SNAs') in the proposed District Plan.*
- *The southeast corner of the mountain is a Scenic Reserve.*

### **Attributes of 965 Aubrey Road**

6. The area under consideration is located on the eastern slopes of Little Mount Iron and forms part of the steep 'downstream' side of the *r*oche moutonée landform. The schist bedrock of the site is largely covered in kānuka-dominant woodland but there are numerous exposed schist outcrops and bluffs. Schist debris has formed gentler toe slopes at the base of the landform and the flatter alluvial terrace surrounding Aubrey Road makes a minor extension into the eastern part of the site. The kānuka woodland is relatively continuous across the site (with the

exception of the existing dwelling curtilage and the eastern extent of the property) and has been identified in the PDP as a Significant Natural Area (SNA E18H). It includes indigenous species such as kānuka, matagouri, *Coprosma* species, pohuehue and wineberry, but also has weed infestation with radiata pine, Douglas fir, briar rose and broom.

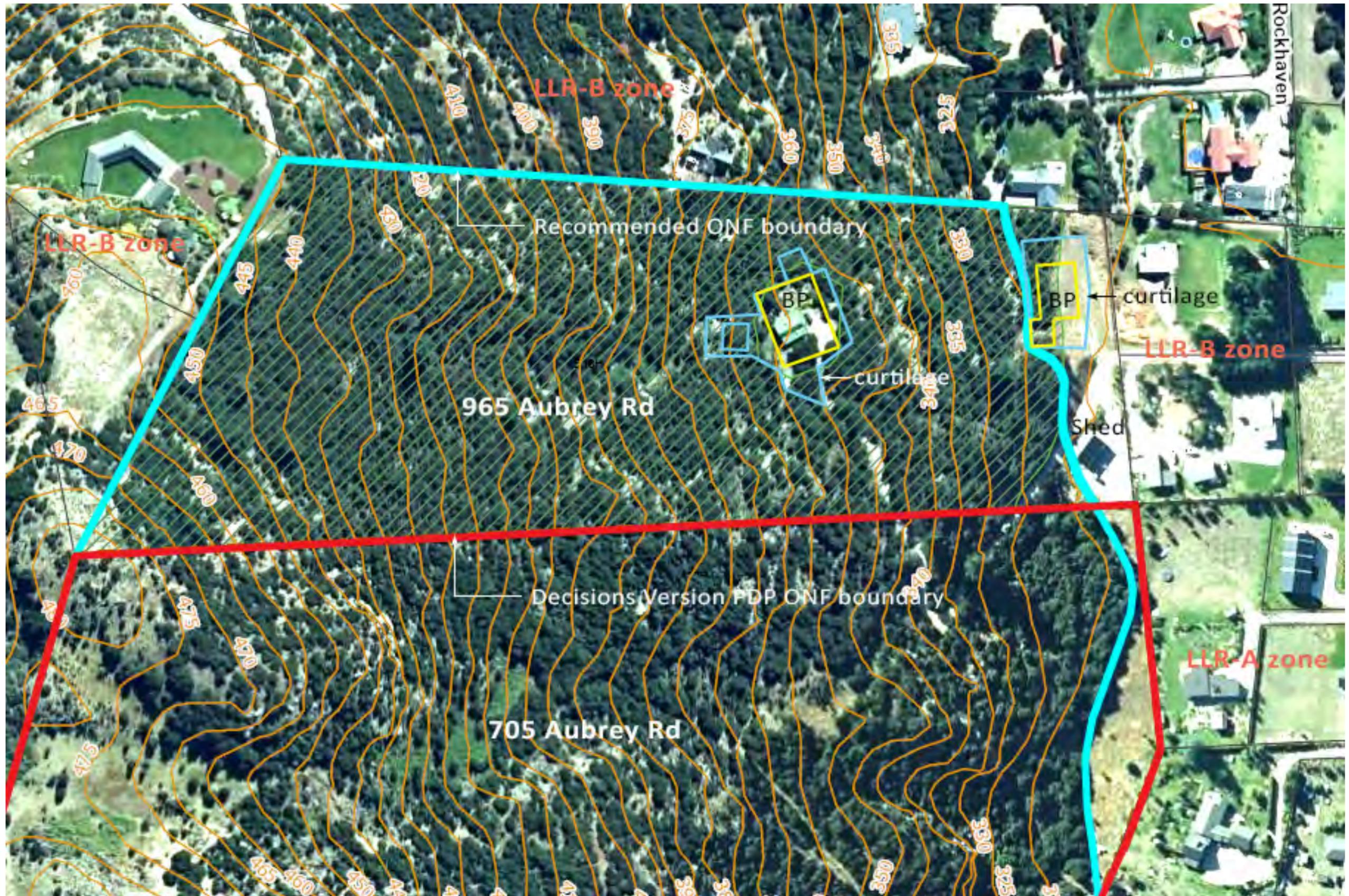
7. A large shed is located on open flat ground in the south-eastern corner of the site and there is an existing dwelling on a small terrace about one-third of the way up Little Mount Iron, accessed by a gravel driveway. Consent has been granted (RM180604) for a two-lot subdivision of the site and additional development is therefore envisaged. This includes a residential building platform and curtilage at the base of the toe slope in the north-eastern corner of the site and a building platform and curtilage for a larger replacement dwelling on the upper terrace. Removal of mature conifers and smaller wilding trees on the site and indigenous revegetation planting in the north-eastern corner are also anticipated by the consent.
8. The context of the site includes developed Large Lot Residential B (LLR-B) zone on the alluvial terrace land to the east, developed LLR-B zone on the northern slopes of Little Mount Iron to the north and west, and a large Rural-zoned site with an approved building platform to the south.
9. Topographically and ecologically the large majority of the site is continuous with the mountain slopes within the PDP ONF landscape categorisation to the south. From surrounding vantage points within Albert Town and further afield, it is perceived as an integral part of the *rôche moutonnée*. The existing dwelling (and additional consented development in this location) is visible and the built form and associated domestication detracts from the natural character and aesthetic values of this part of the feature. Removal of wilding conifers and other weeds on the site, as part of consented development, will enhance the ecological intactness and visual coherence of the mountain slopes.
10. Overall I consider that the site contributes to the attributes and values of the Mount Iron ONF described in paragraphs 4 and 5 above. It is part of the classic *rôche moutonnée* landform, it contains intact and continuous kānuka woodland cover, it is highly natural with some modified areas, and is a highly visible and legible part of the feature.
11. In terms of the appropriate boundary of the ONF on the property, my view is that the change in landform between the mountain toe slopes and the alluvial terrace is the appropriate and defensible boundary of the feature. The recommended ONF boundary is shown in **Attachment A**. The flatter alluvial terrace area, including the existing shed and the proposed Lot 2 building

platform (which has already been excavated into the toe slopes), is outside the ONF. The recommended boundary also excludes alluvial terrace land on the adjoining property to the south – 705 Aubrey Road, Lot 4 DP 471320.



Helen Mellsoy  
*BLA, BHB, Dip Hort (Distinction)*  
*Registered NZILA Landscape Architect*

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Attachment A: Map of Decisions Version PDP and recommended ONF boundaries at 705 and 965 Aubrey Road (not to scale).