

BEFORE THE QUEENSTOWN-LAKES DISTRICT COUCIL

IN THE MATTER of a hearing on submissions to the Proposed Queenstown Lakes District Plan pursuant to clause 8B of the First Schedule to the Resource Management Act 1991

ON BEHALF OF **JARDINE FAMILY TRUST AND REMARKABLES STATION LIMITED (715)**
Submitters

**EVIDENCE OF BENJAMIN ESPIE
(LANDSCAPE ARCHITECT)**

9th JUNE 2017

1. INTRODUCTION

- 1.1 My name is Benjamin Espie. I reside in Queenstown. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the Southern Branch of the New Zealand Institute of Landscape Architects and was the Chairman of that branch between 2007 and 2016. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004 I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council (**QLDC**).
- 1.2 The majority of my work involves advising clients regarding the protection of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development. The primary objective of these assessments and evidence is to ascertain the effects of proposed development in relation to landscape character and visual amenity.
- 1.3 Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in the rural areas of a number of districts. I have provided Environment Court evidence in relation to the landscape categorisation of the parts of the Queenstown Lakes District south of the Kawarau River, and in relation to many resource consent applications and a number of plan changes in this part of the district.
- 1.4 I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note of November 2014 and agree to comply with it. This evidence is within my area of expertise, except where I state that I am relying on information I have been given by another person. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.

- 1.5 In preparing this evidence I have reviewed a statement of evidence prepared by Marion Read dated 24th May 2017 (**Dr Read's evidence**).

2. SCOPE OF EVIDENCE

- 2.1 The purpose of this evidence is to assist the Hearings Panel on matters within my expertise of landscape architecture and landscape planning in relation to Submission 715 on the Proposed District Plan (**PDP**). In relation to this submission, I have been asked by the submitter to prepare evidence in relation to the landscape and visual effects of the requested changes to the Homestead Bay part of the Jacks Point Zone (**JPZ**).

3. EXECUTIVE SUMMARY

- 3.1 The relief sought by Submission 715 has been amended since the time of the lodgement of the relevant submission. The amended relief is set out in a memorandum sent to the Hearings Administrator on the 15th of May 2017 (**the 15th of May memo**) and will be discussed subsequently and in more detail in the evidence of other witnesses.
- 3.2 Dr Read discusses Submission 715 at paragraphs 12.20 to 12.38 of her evidence. She finds that the requested intensification of the Homestead Bay activities can be adequately absorbed by the landscape but Activity Areas R(HB) – A, B and C are problematic and ultimately she recommends against them.
- 3.3 Dr Read has assessed the relief sought by the original submission and not the amended relief. I consider that Dr Read's concerns regarding Activity Areas R(HB) – A, B and C have been dealt with by the amendments to the relief sought that are set out in the 15th of May memo.
- 3.4 I consider that the relief that is now sought will not lead to significant adverse effects on landscape character. I consider that most potential visual effects will be well mitigated but there will be some residual effects on particular views that are available from a part of the surface of Lake Wakatipu and from the edge of Lakeside Estate.

4. AMENDED RELIEF

4.1 In relation to landscape matters, the most relevant changes to the relief sought (as set out in the 15th of May memo) are:

- the previously requested Education and Innovation Campus Activity Area (EIC) has been deleted.
- The requested R(HB) Activity areas have been reconfigured;
- An earthworks and landscape design is now proposed in order to reflect the situation that exists to the north between the Jack's Point Activity areas and SH6; a large sweeping hummock of high topography that accommodates stands of native vegetation will sit between the R(HB) activity areas and SH6. Earthworks will remove material from the R(HB) activity areas themselves. The result will be that the R(HB) activity areas gain good views and solar access from the north but will not be readily visible from SH6 (in fact, built form will be very minimally visible, if at all). The foreground that is experienced from SH6 will be akin to that of Jack's Point; it will be visually characterised by open paddock space in front of a rolling area of high topography that accommodates sweeps and stands of beech-dominated native vegetation. I attach an overall plan of the earthworks to this evidence as Appendix 2 and conceptual landscape design plans as Appendix 3. Provision 41.5.12 (as per the 15th of May memo) requires this earthworks and landscaping work to be done before any buildings can be erected in the relevant R(HB) Activity Areas.
- The submission now supports notified Policies 41.2.1.4 (that residential development is not readily visible from SH6) and 41.2.1.10 (that development associated with farming shall not over-domesticate the landscape). The submission also proposes a new Policy 41.2.1.38 to *"provide for development within the Homestead Bay area in a way that maintains an open, rural form of landscape character and visual amenity as experienced from State Highway 6"*.
- The original submission sought to delete notified provision 41.5.2.7 that relates to native vegetation within the OSR Activity areas. The relief that is now sought proposes an amended version of notified provision 41.5.2.7 (now numbered 41.5.3.7 as per the 15th of May Memo) that requires each lot within the OSR Activity Area to have a total area of native

vegetation that is at least 20% of the lot size. This treatment corresponds to the Jack's Point Preserve lots.

- 4.2 I shall refer to the relief that is now sought as the **requested situation**. In relation to Homestead Bay, the situation that is provided for by the PDP is spatially identical to the situation that is provided for by the Operative District Plan (**ODP**). I shall refer to this situation as the **operative situation** or as the **operative/PDP situation**.

5. LANDSCAPE CHARACTER

EXISTING LANDSCAPE CHARACTER

- 5.1 Landscape character has been defined as the “*distinct and recognisable pattern of elements in the landscape that make one landscape different from another, rather than better or worse*”¹. The elements that give any landscape its character are derived both from nature (geomorphology, ecology, hydrology) and from human interaction (roads, buildings, human land uses, elements that have historical or cultural significance).
- 5.2 The PDP JPZ can be seen on Appendix 5 to this evidence. It covers an area of approximately 1270 hectares. Activity areas that provide for development within this zone cover very approximately 250 hectares, although some of these activity areas provide for development at a low density. The JPZ sits within the Coneburn Valley, being a broad, flat bottomed valley that runs north to south from the Kawarau River to Lumberbox Creek. The eastern side of the valley is formed by the Remarkables, while the western side is formed by Peninsula Hill, Jack's Point hill and a line of rounded intervening hills.
- 5.3 The JPZ comprises of three parts; from north to south, Hanley Downs, Jack's Point and Homestead Bay. Over the last decade, the JPZ has been incrementally developed, particularly the Jack's Point part, which provides for a golf resort development with considerable residential and village activities associated with it. The Hanley Downs part of the JPS is subject to Plan Change 44, which is in the process of being settled via the resolution of Environment Court

¹ Landscape Institute and Institute of Environmental Management and Assessment *Guidelines for Landscape and Visual Impact Assessment* (3rd ed, Routledge, Oxford, 2013), page 157.

appeals. I understand that a settlement is likely in the near future. Assuming this is the case, the Hanley Downs part of the JPZ will provide for a more conventional form of suburban development, albeit one that incorporates considerable open space.

5.4 The Homestead Bay part of the JPZ has not been developed yet. The operative/PDP Homestead Bay structure plan can be seen on Appendix 5 to this evidence (which is identical to the operative structure plan). In short, the operative/PDP provisions provide for:

- O/S Activity Area: open space;
- OSF Activity Area: open space with native revegetation covering 80% of its area;
- FBA Activity Area: the existing homestead dwelling, farm buildings, craft and farm produce and sales, a farm stay operation and a bed and breakfast operation;
- V Activity Area: a residential and visitor accommodation village including commercial and hospitality operations;
- BFA Activity Area: A boat ramp, jetty, boat shed and parking area;
- OSH: horticulture and 15 dwellings;
- OSR: 12 dwellings with native revegetation.

5.5 Overall, the operative/PDP Homestead Bay provisions provide for a dense village overlooking the southern arm of Lake Wakatipu. The village would be surrounded by low-density activities dominated by a rural, farm-like character. These activities would include lifestyle properties somewhat akin to the Jack's Point Preserve sites. Topography means that the village and adjacent activities would be quite separated from the other parts of the Jack's Point Zone but would be linked to them by the main road of Maori Jack Road.

5.6 The village itself would be sizable; approximately 6.7 hectares in area, which is larger than central Queenstown². I consider that this village activity area would most likely develop as a visitor accommodation focussed, resort-like development, perhaps incorporating one or more hotels, visitor accommodation apartments, residential apartments/condominiums, visitor-focussed

² Being the area bounded by Shotover Street, Marine Parade, Earl Street and Stanley Street.

shops and hospitality operations. It may also include freehold residential lots with detached dwellings. The village would likely be focused on the lake edge and jetty area and would be surrounded by the lifestyle properties and farm based activities provided by the other activity areas.

- 5.7** At a broader scale, the southern half of the floor of the Coneburn Valley will be dominated by suburban/resort land use if the operative/PDP zoning is developed. The northern half of the valley floor would remain of a pastoral/agricultural character, as would the more elevated land that forms the rounded western wall or lip of the valley. The slopes of the Remarkables to the east of SH6 retain a rugged, wild, sublime landscape character.
- 5.8** A policy of the ODP and notified PDP is to ensure that development within the JPZ is “not readily visible from SH6”³. Exactly what degree of visibility of built form is envisaged by this policy is not clear, however the policy does not use the phrases “invisible” or “not visible”. In practice, existing built form within the JPZ is visible from SH6 but is generally well set back from the highway, considerably screened by landform (often artificially enhanced landform) and will be increasingly screened in the future as existing native vegetation matures. In effect, the landscape character of the eastern part of the floor of the Coneburn Valley, including the SH6 corridor, is dominated by natural and rural patterns, with built development being peripheral; while the western part of the floor of the Coneburn Valley is dominated by the patterns of suburban/resort development.

EFFECTS ON LANDSCAPE CHARACTER

- 5.9** Landscape effects are the effects that an activity may have on the landscape as a resource in its own right; effects on the patterns and processes that make up the landscape, rather than effects relating to views or visibility.
- 5.10** When describing effects, I will use the following hierarchy of adjectives:
- Nil or negligible;
 - Slight;
 - Moderate;
 - Substantial;
 - Severe.

³ ODP, Section 12.1.4, Policy 3.10; and PDP Policy 41.2.1.4.

5.11 Comparing the amended relief sought by the submission to the PDP/operative situation, the actual changes to land use/development patterns that will appear on the ground can be summarised as follows (reference to the bullet points of paragraph 5.3 and to Appendices 1 and 4 is useful):

- The village (V Activity Area) and boat ramp area (BFA) will remain as per the operative situation;
- The operative FBA on the lakeside slopes area west of the village will be replaced by an OSR area providing for 12 dwellings over an area of 14.4ha, with each lot incorporating native revegetation;
- The operative OSR area on the lakeside slopes area east of the village will expand further east towards Lakeside Estate, doubling in size so as to provide 29 instead of 12 dwellings over an area of 36.7ha, with each lot incorporating native revegetation;
- A new area of suburban density residential activity (R(HB) – E) will be provided for on relatively flat terrace land immediately west of the village in a location that is open space under the operative situation.
- The operative OSH horticulture area that provided for 15 dwellings behind (north of) the village will be replaced by a large (32ha) area of suburban density residential activity (R(HB) – D). This is located on relatively gently sloping south-facing land, looking down the southern arm of Lake Wakatipu.
- A new area of suburban density residential activity (R(HB) – A, B and C) will be provided for on relatively flat rolling land closer to SH6 in a location that is Rural General Zone under the operative situation. This suburban area will total 14.4ha in area. Considerable earthworks are proposed such that built development will not be readily visible from SH6. Part of the envisaged earthworks will involve a large sweeping hummock of high topography that accommodates stands of native vegetation. This treatment will echo that of the Jack’s Point highway frontage further north. As is set out on plans and figures attached to the 15th of May memo and to Mr Geddes’ evidence, the earthworks and the building height standards for areas R(HB) – A, B and C have been formulated so that built form will be entirely screened

in views from SH6. Obviously, in terms of visual screening, this goes further than the “not readily visible” requirement of the relevant Policy.

- 5.12** In summary, the difference between the operative situation and the situation now sought by Submission 715 is that the situation sought by the submission will include considerable areas of suburban development and expanded areas of rural living development. The suburban development will total approximately 50ha, which is very approximately half the size of all of the already-built suburban development within Jack’s Point (not including Hanley Downs). This area of suburban development will generally wrap round behind (west, north and east of) the village as it faces the southern arm of the lake. The expanded rural living development (totalling 51.1ha and providing for 41 dwellings) will sit on the sloping land to the east of the village that adjoins the lake edge.
- 5.13** Overall, the operative situation (as described in paragraph 5.4) provides for a sizable visitor-focussed village surrounded by low-density activities dominated by a rural, farm-like character. The requested situation provides for the same village but surrounded by considerable residential activity, particularly suburban development wrapping round behind it. In both situations, the development enabled by the Homestead Bay part of the JPZ would be somewhat separated from the Jack’s Pont development, being its own neighbourhood that is oriented towards the southern arm of Lake Wakatipu.
- 5.14** As has been discussed above, the existing character of the floor of the Coneburn Valley is one that is partially defined by suburban development. Appendix 4 of this evidence is a composite plan showing the Homestead Bay Structure Plan sought by Submission 715 in conjunction with the PDP structure plans of the Jacks Point and Hanley Downs parts of the JPZ. In a broad-scale sense, locating suburban areas as requested by the submission is not something that discords with existing landscape character; the southern half of the Coneburn Valley floor already accommodates very considerable zoned suburban development. In this broad-scale sense, I do not consider that the insertion of new suburban activity areas into the southern Coneburn Valley is adverse in relation to landscape character. Subject to specific details and the consideration of visual effects (to be discussed subsequently), this is a vicinity that can absorb additional suburban development without degrading landscape character.

- 5.15** At a finer scale, the eastern part of the Coneburn Valley floor, including the SH6 corridor, currently retains a rural character dominated by pasture. A northbound user of SH6 experiences a pleasant, countryside-like character until they are at the Peninsula Road intersection. I consider that it would be an adverse effect if this situation was to be lost. The relief sought sets development back from SH6 by at least 200 metres and replicates the roadside treatment of the Jacks Point area to the north. Again, subject to visual effects, I do not consider that the requested treatment will create an effect that is discordant with existing landscape character.
- 5.16** Continuing to look at landscape character effects at a finer scale, the character of the lake edge area is a relevant issue. As can be seen on Appendix 1, for most of the lake frontage of the Homestead Bay part of the JPZ there is a large area of public land outside of the Activity Areas. In general, there is between 50 and 130 metres of public land between the waters' edge and the edge of the relevant activity areas. This strip of public land currently takes the form of farmed pasture, with fences, shelterbelts and grazing currently extending well onto the public land. This public land extends east to the Lakeside Estate boat ramp and jetty area and onwards (via a formed walking track) to a carpark on SH6 to the immediate south of Lakeside Estate.
- 5.17** Whether the Homestead Bay area is developed in accordance with the operative/PDP situation or the requested situation (as per the amended relief), I envisage that this public lakeside land would very likely become a park-like reserve of some sort. In either event the village will sit immediately beside the public land and the boat ramp and jetty area (enabled by the BFA). Under the situation now sought by Submission 715, the Homestead Bay area would accommodate more population, so it is logical to assume that the lakeside public reserve might take a more developed form with trails, rubbish bins, picnic areas etc, perhaps something akin to the Frankton Foreshore Reserve. In any event, the manner in which this public land is developed and maintained will be in the hands of the QLDC.
- 5.18** If the relief sought by Submission 715 is confirmed, much of the land that sits behind this public lakeside strip will remain as per the operative situation. The BFA, V and existing OSR Activity Areas will remain as they are, however the existing FBA will change to an OSR Activity Area and the existing OSR will extend further to the east. The OSR provides for particularly low density development with a component of native revegetation. I consider that the QLDC will be able to appropriately use its controls in relation to the development of the OSR (both at subdivision and house-building stages) to ensure an appropriate interface between the OSR and the public reserve land. In short, I consider that the new development in the vicinity of the lake edge that

would be enabled if Submission 715 is accepted would not degrade the character of the lake edge vicinity when compared to the operative situation. New enabled development would be of a particularly low density, would involve native revegetation, would be subject to QLDC control, would be considerably set back from the lake edge and would be separated from the lake edge by a deep public reserve area that would be developed and managed by the QLDC.

5.19 In summary in relation to effects on landscape character, I consider that the relief sought by the submitter will:

- accord with the landscape character of the Coneburn valley at a broad scale. Additional suburban development will be situated on the floor of the southern half of the valley; an area that is characterised by suburban or resort development;
- preserve the rural or pastoral character that dominates the eastern part of the floor of the Coneburn Valley, including the SH6 corridor;
- not degrade the character of the Homestead Bay lake edge area when compared to the operative situation.

6. VIEWS AND VISUAL AMENITY

6.1 Observers that have the potential to have their views or visual amenity affected by the relief sought by the submission can be categorised as follows:

On public land:

- SH6 users;
- Lake users;
- Users of trails within Jack's Point;
- Users of the Remarkables Conservation Area;

On private land:

- Owners and occupants of land within Jack's Point;
- Owners and occupants of land within Lakeside Estates.

- 6.2** I will discuss each of these groups in turn, examining existing views and visual amenity and the effects of the relief sought.

SH6 USERS

- 6.3** The vast majority of potentially affected members of the public visually experience the Coneburn Valley from SH6. The character that is experienced is described previously; generally a pleasant rural form of visual amenity dominates. Key components of views are the steep and rugged slopes of the Remarkables, the lake surface and the farmed paddock lands that form the immediate foreground to views from the highway. In a visual sense, the experience of travelling through the Coneburn Valley is somewhat transitional. A southbound traveller leaves the urban/suburban visual pattern of Queenstown at the Peninsula Road intersection and immediately experiences the visual patterns and amenity of a rural landscape, one that is dominated by the vast and overwhelmingly natural western face of the Remarkables. Notwithstanding this, visual cues of human activity associated with Queenstown are still observed as one moves south; the signage and road of the ski area, the entrance and visible built form of Jack's Point and Lakeside Estates and the hangar and activity of the NZone airport and skydiving operation. Once past Lakeside Estate a considerably wilder and lake-dominated visual experience begins. The same is true in reverse for a northbound traveller.
- 6.4** Only the Jack's Point part of the JPZ has been built to date. Construction work is underway on the first parts of Hanley Downs. In relation to the specific stretch of SH6 that passes the JPZ, the built part of Jack's Point is intermittently visually evident as part of the foreground to western views. Buildings themselves are relatively hidden and not a prominent component of views. The road entrance, walls and planting are evident. The effect is that the built part of Jack's Point is not a prominent component of views for a highway user. Open space and natural landscape components dominate. However, while adjacent to the built part of Jack's Point, a SH6 user is visually aware that built development is nearby to the west. This visual experience relates to an approximately 1.8km stretch of SH6 that runs adjacent to the built part of Jack's Point.
- 6.5** As Hanley Downs is built, the visual experience that a SH6 user has when adjacent to the built part of Jack's Point will continue further to the north. Again, there will be intermittent visual evidence of built development but it will not be prominent; rural character will dominate the visual

experience. The overall stretch of SH6 from which this visual experience will be had will extend to approximately 3.6km.

6.6 I consider that if the Homestead Bay area is developed in accordance with the relief sought, then the visual experience that a SH6 user has when adjacent to the built part of Jack's Point and Hanley Downs will continue further south; the overall stretch of SH6 from which this visual experience will be had will extend to approximately 5.2km. This is illustrated on Appendix 4. As a SH6 user passes the Homestead Bay vicinity (i.e. approximately on the stretch of SH6 between the northern edge of Lakeside Estate and the road entrance to the existing NZone airport), the foreground to the west will consist of open pasture land to a depth of at least 250 metres. Beyond this the proposed large sweeping hummock of high topography will be evident, with its associated stands of native vegetation. The road access entrances will be plainly evident as a SH6 user passes them. However, unlike the built part of Jack's Point, dwellings within Homestead Bay will be invisible or at least very difficult to notice. The earthworks design and height restrictions associated with the R(HB) – A, B and C Activity Areas have been carefully formulated so that built form will be practically invisible. The earthworks and planting that are proposed will replicate the visual experience that is currently had when adjacent to the built part of Jack's Point, particularly the part south of Maori Jack Road, but buildings will be less visible.

6.7 In an overall sense, I consider that the visual amenity of a SH6 user will not be significantly adversely affected. The stretch of SH6 between Lakeside Estate and the NZone entrance will visually change but in a way that accords with its context and preserves the most important visual qualities. A rural outlook will remain for highway users, one that is dominated by the Remarkables, pasture land and the lake.

LAKE USERS

6.8 As can be seen from Appendices 1 and 4, the existing Homestead Bay structure plan provides for development centred on the bay foreshore. Much of this development would be plainly visible from an area of lake surface running south and southwest from the foreshore. In a visual sense, the change that the requested relief would bring would be an increase in the amount of visible built development surrounding the village. Specifically:

- To the left of the village the existing FBA (that provides for the homestead dwelling, farm buildings, farm produce and sales and visitor accommodation) will be replaced by an area of OSR that provides for 12 dwellings. Most (perhaps the southern two thirds) of this activity area will be visible from the lake;
- Behind and to the immediate left of the village the existing OSH (that provides for horticulture and 15 dwellings) will be replaced by a considerable area of R(HB) that provides for suburban development;
- To the right of the village the existing OSR (that provides for 12 dwellings) will be expanded further to the right so as to approximately double in size and accommodate 29 dwellings.
- The remaining newly requested Activity Areas; the R(HB) – A, B and C areas will not be visible from the lake.

6.9 In broad terms, in views from the lake, the village would be surrounded by areas of suburban development and larger areas of rural living development, if the relief now sought by Submission 715 is confirmed.

6.10 The part of the lake that gains potential views is a broad area that receives relatively little recreational use compared with areas closer to, and west of, Queenstown. Recreational users are likely to be engaged in fishing, touring or (to a much lesser degree) water skiing. The situation sought by the submission would not open visibility of development to new parts of the lake. Rather, viewers that would already see development under the operative situation would see intensified development under the requested situation. In both the operative and requested situations, visible development will be confined to the valley floor part of Homestead Bay; between the rounded rocky hill of Jack's Point hill (which will remain free of development) and the built area of Lakeside Estate.

6.11 While the visible valley floor landform on which the Homestead Bay part of the JPZ and Lakeside Estate sit is outside of the identified ONL, views from the relevant part of the lake surface in the direction of Homestead Bay are very much dominated by the Remarkables, Peninsula Hill and Jack's Point hill. In these views, I consider that development within Homestead Bay enabled by

the operative situation would amount to a relatively slight detraction from the overall quality and grandeur of the available views. Slight, because development would be in a visually logical location (on the already-modified and occupied valley floor landform) and because the development would be dwarfed by the natural elements in the views. In the same views, I consider that development enabled by the situation sought by Submission 715 would amount to an increased detraction. Built development would be more visually obvious and more influential on the composition of views. I consider that for the particular observers that experience these views, the degree of adverse effect of the additional development could be described as slight to moderate.

USERS OF TRAILS WITHIN JACKS POINT

- 6.12** Appendix 6 to this evidence is a map showing the walking trails within Jack's Point. I understand that easements relating to these trails are such that the trails are effectively public places. The southern part of the Jack's Point Loop Trail ascends Jack's Point hill from a carpark on Maori Jack Road. It passes close to the summit of Jack's Point and then descends to near the lake edge to join the Lakeside Trail. The ascending eastern part of this stretch of trail (i.e. the stretch that ascends from the valley floor near the carpark to near the summit of Jack's Point; approximately 750 metres in length) allows some views over the Homestead Bay area.
- 6.13** The relevant stretch of trail gains views over much of the floor of the Coneburn Valley including most of the JPZ. The built part of the JPZ is visible as is the Hanley Downs area which is yet to be constructed. To the southeast, a viewer can see much of the existing Activity Areas of the Homestead Bay part of the JPZ, although the existing FBA is largely hidden. The village, OSH and OSR areas would be displayed to a viewer that looks at this part of the valley floor.
- 6.14** Under the requested situation, the village, expanded OSR and the R(HB) areas would be visible, covering an expanded area towards SH6. Homestead Bay will have the appearance of a relatively expansive suburban area, rather than a more isolated village, as it would under the operative situation; it would be more akin to the development of the built part of Jack's Point that is also seen from the relevant stretch of track.
- 6.15** I consider that the reduction of the area of rural pastoral land present in these views will bring a consequential reduction to the amenity that a track user derives from them. The overall scene will appear more built and less rural and natural than under the operative situation. A viewer will

feel less remote. However, given that a viewer of this sort can see most of the floor of the Coneburn Valley and practically the entire JPZ, I consider that the degree of this effect on these particular viewers is moderate at most. In either the operative or requested situations, a viewer's experience is essentially of being in an elevated location of natural character, overlooking a developed valley floor.

USERS OF THE REMARKABLES CONSERVATION AREA

6.16 The western face of the Remarkables rises like a steep rocky wall to the east of SH6. The upper part of this face (very approximately above 740masl) is public land administered by the Department of Conservation (**DOC**). Beyond the high, jagged ridge of the Remarkables sits the Remarkables Ski Area and Wye Valley. The public land on the western face itself allows views down over the Coneburn Valley and across Lake Wakatipu. The vast majority of this western face is very steep, rugged and extremely difficult to access. In practice, the only parts of this face that are accessed by the public are:

- A lookout point above the Shadow Basin chairlift of the Remarkables Ski Area. This is relatively well used, particularly in the winter.
- The summits of Double Cone and Single Cone that are accessed by recreational mountaineers year-round.
- Queens Drive, a very rugged hiking route that traverses the upper western face to the west of Double and Single Cone.
- A telecom station above Lake Alta that is accessed by backcountry skiers in winter (relatively low numbers) and occasional hikers in summer.

6.17 I attach an indicative photograph from the Queen's Drive as Appendix 7 to this evidence. From viewpoints of this sort vast panoramas over very broad distances are available. The JPZ is a minor element in these panoramas. It appears as a small area of built development on a valley floor landform far below the viewer. The Frankton Flats and the floor of the Wakatipu Basin are similarly visible to a viewer in these locations. To an observer that knows what to look for, the change that would be brought about if the relief sought by Submission 715 is confirmed would be discernible. However, I consider that this would alter the composition of views to a very slight

degree. The grandeur and quality of the visual amenity that is experienced from these locations will remain undegraded.

OWNERS AND OCCUPANTS OF LAND WITHIN JACK'S POINT

- 6.18** Some elevated areas within the Jack's Point part of the JPZ gain views over currently open land towards Homestead Bay and the Bayonet Peaks beyond. Indicative photographs from the viewpoints that gain the most visibility are attached to this evidence as Appendix 8. These views are in a southerly direction and are often the secondary views from any given dwelling, the primary views being to the north towards Coronet Peak. Notwithstanding this, these views are of considerable quality. In these views, space within the Jack's Point development generally forms the foreground, the open paddocks of the NZone area and northern Homestead Bay form the mid-ground and the slopes and peaks of Cecil Peak and the Bayonet Peaks form the background.
- 6.19** In these views, development enabled by the operative situation would have very little influence on the quality of views. Some upgrade work to Maori Jack Road may be evident, as may some development within the uppermost parts of the operative Homestead Bay OSH and FBA.
- 6.20** Under the situation sought by Submission 715, development within the Homestead Bay area will be more visually evident. The eastern part of R(HB) – D and most of the R(HB) A, B and C activity areas will be within a zone of theoretical visibility from the viewpoints described above. Viewing distances will be in the order of at least 700 metres and views will be relatively horizontal (i.e. generally only the northern edge of the Homestead Bay Activity Areas would be visible).
- 6.21** The provisions sought by Submission 715 include the earthworks and vegetation designs shown on Appendices 2 and 3. This design will mean that much of the northern edge of the new Activity Areas will take the form of a broad rolling hillock with sweeps and stands of native vegetation. In general terms, this will mean that when seen from the north, the neighbourhoods enabled by the requested activity areas will have a soft, green edge and built form will be considerably screened.
- 6.22** Appendix 9 to this evidence is a series of cross-sections showing a view line from elevated parts of Jack's Point to the activity areas of Homestead Bay sought by the submission. The mounding is shown crudely on these sections but its height is accurate. I consider that if the submission situation is followed rather than the operative situation, then the midground of views from the

described viewpoints will change. It will be less uniform and simple and will include evidence that an area of built development is present to the south of the viewer. Buildings will be relatively minimally visible themselves but a soft green edge will prevail. I consider that the degree to which the overall composition of these particular views is degraded is best described as slight to moderate. The amenity derived from these views will remain high. I do not consider that any fundamental characteristics will be lost but they will become slightly less natural. It must also be borne in mind that only certain views from certain dwellings will be affected at all.

OWNERS AND OCCUPANTS OF LAND WITHIN LAKESIDE ESTATE

- 6.23** Lakeside Estate is a self-contained rural living neighbourhood of approximately 40 lots that are generally around 4ha in area each. Topography falls to the southwest. The northern lots of Lakeside Estate gain some views to the north across currently open land that is subject to Submission 715.
- 6.24** As is evident on Appendices 1 and 4, an incised watercourse gully separates Lakeside Estate from the land subject to the relevant submission. In visual terms, Lakeside Estate is also separated from the relevant area by a mature line of picea, eucalypts and sequoias that run along the northern edge of Lakeside Estate. These trees are protected by conditions of resource consent RM990277 (the subdivision that created Lakeside Estate) and by an associated legal covenant⁴. These trees strongly filter views to the north from the properties of Lakeside Estates but do not completely screen it. Additionally, as can be seen on the aerial photograph of Appendix 1, a mature L-shaped shelterbelt on the north-western side of the incised watercourse gully also screens part of the requested OSR area from part of Lakeside Estate.
- 6.25** As can be seen on Appendices 1 and 4, the area that generally lies to the direct north of Lakeside Estate will remain open and undeveloped. The southeastern edge of R(HB) – C takes the form of a rolling mound with sweeps of vegetation. The closest views of this activity area from Lakeside Estate are at distances of approximately 550 metres across open pasture. For observers at the northern edge of Lakeside Estate, some built form of the suburban development of R(HB) – C is likely to be visible but will be visually softened by the vegetation of the mound area. Control over landscape treatment can also be used at subdivision stage to ensure appropriate treatment on the southern edge of the developed area and appropriate treatment of the Homestead Bay

⁴ Legal Covenant reference: 981931.

access road. Occupants of the northernmost lots of Lakeside Estate that look to the north, (through the trees on the northern edge of Lakeside Estate) will have some visual evidence of development in the R(HB) – C area. It will be separated from the viewer by at least a 550 metre stretch of pasture and will have a soft vegetated edge. I do not consider that development in the R(HB) – C will degrade the views or amenity of a Lakeside Estate occupant to a degree that is more than slight, particularly given that the main views from Lakeside Estate are to the south and southwest.

- 6.26** As can also be seen on Appendix 1, the requested OSR lies approximately 170 metres northwest of the northwestern edge of Lakeside Estate. The OSR provides for particularly low density residential land use (approximately 1 dwelling per 1.3 hectares). 20% of each site (approximately 2500m² on average) must be revegetated using native species. The majority of this OSR area will take the form of open space. The southernmost part of the OSR takes the topographical form of a slightly rounded headland between the two incised watercourses that can be seen on Appendices 1 and 4. Because of its rounded form, only the southeasternmost part of this area of OSR can be seen from Lakeside Estate. All of this means that it is likely at only two or three dwellings within the OSR would be within a line of sight from Lakeside Estate. Rather than looking over open pasture to the northwest, occupants on the northwestern edge of Lakeside Estate will effectively look at two or three dwellings set within open space. This will have some effect on the amenity of these observers. The main focus of views from these Lakeside Estate locations will be the lake and mountains, however, views will be less empty and natural than they currently are. For some individual dwellings on the northwestern edge of Lakeside Estate, I consider that this effect will be of a moderate degree.

SUMMARY REGARDING VISUAL EFFECTS

- 6.27** The most relevant public views to be considered are those from SH6 and Lake Wakatipu. In relation to SH6, the relief sought by the submission would mean that the visual experience that is had by SH6 users that are adjacent to the built part of Jack's Point would continue further south (but built form would be less visible). A rural outlook will remain for highway users, one that is dominated by the Remarkables, pasture land and the lake.
- 6.28** For viewers on the lake surface that are to the south and southwest of Homestead Bay, development enabled by the situation sought by the submission will increase the intensity of

visible development that sits around the village. This will amount to a moderately increased detracting from the naturalness that currently characterises these views.

- 6.29** Relevant private views are available from the built part of Jack's Point and from Lakeside Estate. From some private viewpoints within elevated southern parts of Jack's Point the midground in views to the south will change. It will be less uniform and simple and will include some visual evidence that an area of built development is present to the south of the viewer (although buildings themselves will often be difficult to see. The amenity derived from these views will remain high, the fundamental characteristics will not be lost but views will become slightly less natural.
- 6.30** Some visibility of new development will result from the relief sought when experienced from the northernmost parts of Lakeside Estate. For most viewers, the effect will be slight but for some that are closest to the extended OSR area, effects could be described as moderate; the composition of views becoming less natural.

7. DR READ'S EVIDENCE

- 7.1** Dr Read discusses Submission 715 at paragraphs 12.20 to 12.38 of her evidence. I will not repeat her findings here but in very brief summary, she finds that the requested intensification of the Homestead Bay activities could be adequately absorbed by the landscape but Activity Areas R(HB) – A, B and C could not be absorbed since the proposed mitigation will have its own adverse effects. She gives an overall comment at her paragraph 12.28 as follows:

"The proposed alterations to the structure plan within the existing zone would allow for a much greater density of development than the current structure plan. The current structure plan activity areas are prescriptive, bespoke, and very low density. The proposed changes would result in development of a more similar character to that within Jacks Point. It is my opinion that the effects of such intensification would be localised. While it would produce a slightly more urban character to the residential development in the existing zone, the existence of the Village AA and the FBA

*structure plan would be visible from the surface of the lake. The proposed intensification would increase the density of visible development but not alter its character appreciably*⁵.

- 7.2** It is important to note that Dr Read has assessed the effects of the relief sought by the original submission, not the amended relief as per the 15th of May memo.
- 7.3** A preliminary point that Dr Read raises in her paragraph 2.26 relates to the boundary of the identified ONL at the southern edge of Jack's Point hill. I agree with Dr Read that the line on the PDP maps is not correct and that the blue line that she shows in her Figure 18 is preferable. My only qualification is that the very southern part of Dr Read's line is perhaps better drawn as Mr Davis (QLDC ecological witness) has in his Figure 14.
- 7.4** Dr Read agrees with the provisions that Submission 715 seeks in relation to vegetation requirements within the OSR and OSF. However, she suggests an additional provision that she sets out in her paragraph 12.30 requiring revegetation of the gully that sits within the extended OSR. I agree that her suggested provision would usefully enhance the natural character of this landform and I support its inclusion.
- 7.5** Dr Read agrees that a single home site can appropriately be located on Lot 8 DP 443832A and she recommends finalising a location for this before finalising the structure plan. I agree with this approach and am happy to coordinate with Dr Read on this issue before the hearing of submissions.
- 7.6** The only other issue on which Dr Read disagrees with the relief sought by the submission is that of Activity Areas R(HB) – A, B, C and the eastern extreme of D. She expresses her concerns in the second half of her paragraph 12.32 and in paragraph 12.34. Her concern with the eastern part of R(HB) – D is that it may enable buildings that are visible from SH6. In my understanding, the mounding and vegetation that is now part of the relief will ensure that no built form within R(HB) – D is visible from SH6.
- 7.7** Dr Read's concerns with Activity Areas R(HB) – A, B and C are that mounding and planting used for visual mitigation *"would, in and of itself, have an adverse effect on the quality and character of the landscape, and on the visual amenity which can currently be enjoyed from the road in this*

5

vicinity. It is also the case that much of the development in these proposed areas would be readily visible from the residential areas already present in Jacks Point, in particular R(JP-SH) 1 and R(JP) 1”⁶.

- 7.8** I have discussed the effects of development within Activity Areas R(HB) – A, B and C in the main body of this evidence. I consider that visual amenity experienced from SH6 will not be significantly adversely affected. The visual experience that is had by a traveller moving between Lakeside Estate and the Kelvin Peninsula will remain much as it is now. Views to built development enabled by the relief would only be available from a few locations within the built part of Jack’s Point. Effects as experienced from these viewpoints would be well mitigated by the previously described mounding and vegetation. Notwithstanding this, I consider there will be some residual visual effect as has been discussed.
- 7.9** Overall, I consider that there is significant agreement between myself and Dr Read. I consider that Dr Read’s concerns regarding Activity Areas R(HB) – A, B, C and D have been dealt with by the amendments to the relief sought that are set out in the 15th of May memo.

8. CONCLUSIONS

- 8.1** The southern half of the floor of the Coneburn Valley will be dominated by suburban/resort land use once the operative zoning is developed. However, the eastern part of the floor of the Coneburn Valley, including the SH6 corridor, will remain dominated by natural and rural patterns, with built development being peripheral and not readily visible from SH6.
- 8.2** The situation sought by Submission 715 will include considerable areas of suburban development and expanded areas of rural living development in a way that generally wraps round behind (west, north and east of) the village as it faces the southern arm of the lake. In relation to landscape character, I consider that the relief that is now sought will accord with the landscape character of the Coneburn valley at a broad scale. Additional suburban development will be situated on a part of the valley floor that is already characterised by suburban and/or resort development; the rural and pastoral character that dominates the eastern part of the valley floor

⁶ Evidence of Dr Marion Read, 24 May 2017, paragraph 12.34.

(including the SH6 corridor) will be preserved; and the character of the Homestead Bay lake edge will not be degraded.

8.3 In relation to visual effects:

- The relief sought by the submission would mean that the visual experience that is had by SH6 users that are adjacent to the built part of Jack's Point would continue further south (but built form would be less visible). A rural outlook will remain for highway users, one that is dominated by the Remarkables, pasture land and the lake.
- For viewers on the lake surface that are to the south and southwest of Homestead Bay, development enabled by the situation sought by the submission will increase the intensity of visible development that sits around the village. This will amount to a moderately increased detracting from the naturalness that currently characterises these views.
- From some private viewpoints within elevated southern parts of Jack's Point the midground in views will be less uniform and simple and will include some visual evidence of built development. The amenity derived from these views will remain high but views will become slightly less natural.
- Some visibility of new development will be experienced from the northernmost parts of Lakeside Estate. For most viewers, the effect will be slight but for some that are closest to the extended OSR area, effects could be described as moderate.

ATTACHED APPENDICES

- 1 THE REQUESTED STRUCTURE PLAN SOUGHT BY THE AMENED RELIEF
- 2 OVERALL PLAN OF THE EARTHWORKS THAT FORM PART OF THE RELIEF SOUGHT
- 3 THE LANDSCAPE TREATMENT OF THE MOUNDING AREAS THAT FORM PART OF THE RELIEF SOUGHT
- 4 THE PDP JACK'S POINT STRUCTURE PLAN AND THE REQUESTED HOMESTEAD BAY STRUCTURE PLAN ON AN AERIAL PHOTOGRAPH
- 5 THE PDP JACKS POINT STRUCTURE PLAN
- 6 A PLAN OF THE WALKING TRAILS OF JACK'S POINT

- 7 INDICATIVE PHOTOGRAPH FROM THE REMARKABLES CONSERVATION AREA
- 8 INDICATIVE PHOTOGRAPHS FROM THE BUILT PART OF JACK'S POINT
- 9 CROSS SECTIONS SHOWING SIGHT LINES FROM R(JP-SH) - 1

Ben Espie

vivian+espie

4th April 2017