

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Stage 3b of the
Proposed District Plan

**SECOND REBUTTAL EVIDENCE OF MATTHEW STUART BENTLEY JONES
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**LANDSCAPE ARCHITECTURE – REZONINGS –
RURAL VISITOR ZONE + GENERAL INDUSTRIAL ZONE**

19 June 2020

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1. INTRODUCTION

1.1 My full name is Matthew Stuart Bentley Jones. My qualifications and experience are set out in my statement of evidence in chief dated 18 March 2020 (**EIC**).

1.2 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise except where I state that I am relying on the evidence of another person.

2. SCOPE

2.1 This second rebuttal evidence is provided in response to the following evidence filed on behalf of various submitters:

Rural Visitor Zone rezoning's

- (a) Mr Tony Milne for Malaghans Investments Ltd (**31022**); and
- (b) Mr Benjamin Espie for Corbridge Estates Ltd Partnership (**31021**);
- (c) Mr Tony Milne for the Cardrona Cattle Company Ltd (**31039**).

General Industrial Zone rezoning's

- (d) Mr Tony Milne for the Cardrona Cattle Company Ltd (**3349**).

2.2 This is my second statement of rebuttal evidence following that filed 12 June 2020.

REZONING REQUESTS – RURAL VISITOR ZONE

3. TONY MILNE FOR MALAGHANS INVESTMENTS LTD (31022)

3.1 Mr Milne has filed landscape assessment evidence in relation to the RVZ for this site (**Malaghans**). The information provided includes the information I recommended at paragraphs 9.8 – 9.10 and Section 16

of my EIC including undertaking further assessment to identify the site's landscape sensitivity.

3.2 As part of the assessment, the Brett Mills – Kimiakau (31015)¹ submitter site immediately to the north has been amalgamated into the site covered by the Malaghans' submission. This is confirmed at paragraph 6 of Mr Milne's evidence.

3.1 Mr Milne's statement provides detailed and comprehensive analysis and assessment of the site and surrounding environment in relation to:

- (a) The receiving environment;
- (b) The site attributes and values in relation to landscape character (including high country rural character and natural character), landscape values and visual amenity values;
- (c) Landscape sensitivity (including the identification of a Developable Area);
- (d) Landscape effects;
- (e) Visual amenity matters; and
- (f) The appropriateness of the RVZ.

3.2 Mr Milne's statement provides sound reasons and justification for the RVZ rezoning of this site in relation to landscape and visual assessment matters, and I generally concur with the conclusions reached.

3.3 Within his paragraph 42 Mr Milne outlines the extent of the site assessed to have high, moderate-high and low landscape sensitivity ratings and references *Sheet 15 of the GA* (appended to his evidence). In general I agree with the extent of the area mapped as low sensitivity, however, in my opinion the upper slopes along the eastern boundary of the site have high sensitivity². This is due to their steep gradient and the potential visual prominence of this area. Any future development along these upper slopes has the potential to result in adverse effects on the ONL. It is for these reasons that the lower terraced slopes (low sensitivity rating) are more appropriate for future development.

1 A separate submission was provided by 31015.

2 Mr Milne rates these areas as having moderate-high sensitivity.

- 3.4** I also consider that the areas identified as having ‘moderate’ slope³ have a moderate-high landscape sensitivity rating. These areas form ‘pockets’ within the upper eastern extent of the areas Mr Milne rates as low sensitivity.
- 3.5** There is also an opportunity to refine the extent of the RVZ to include the area of low sensitivity only, therefore removing these upper slopes from the RVZ and retaining them as rural zoning.
- 3.6** Mr Milne states at paragraph 50 that a site specific revision to Rule 46.5.1.1 should “*allow a 7m for building height limit for controlled activity within the Skippers zone*”. I agree with this recommendation because, in my opinion, given the visually contained location upon Stapletons Terrace and the context within which future buildings will be located, the difference between a 6m building and 7m will be barely discernible.
- 3.7** Mr Milne states in paragraph 51 that Rule 46.5.5 should be amended so that there is no building setback from the zone boundary. I presume this is for this site specifically.
- 3.8** In my opinion, the 10m setback rule should remain along all boundaries. In particular, the western boundary of the site aligns with the cliff escarpment and provides a highly sensitive edge within the Skippers Canyon. As such, the setback will be receptive to this edge and minimise any potential adverse effects on landscape character or visual amenity and will assist in protecting landscape values of the ONL.
- 3.9** At paragraph 52 Mr Milne supports a variation to standard 46.5.8 in relation to building materials and colours that “*incorporate heritage colours, textures and materials*”. Within paragraph 57 Mr Milne goes on to state that “*built form within the Developable Area should be influenced by heritage of Skippers in terms of form, material and colour*”. I concur with the intention as a means to assisting with maintaining and enhancing landscape and rural character, however no specific description of what this entails has been provided in the

3 Refer Sheet 13 of Mr Milne’s Graphic Attachment to his landscape evidence.

evidence of Mr Milne. Notwithstanding this, in my opinion the proposed standards for the RVZ including those in relation to building height, coverage, material and colours seek to protect the landscape values of the ONL.

3.10 Within the same paragraph, Mr Milne also supports the new rule 46.5.10 that requires roading and infrastructure to be of a rural standard. I agree this change is appropriate from a landscape perspective, to assist with maintaining and enhancing rural character.

3.11 Given the remote location, the proposed provisions and the areas identified as having low landscape sensitivity, I agree with Mr Milne at paragraph 17 that the proposal *“has the potential to complement the visual amenity of the receiving environment”*.

3.12 I change the assessment conclusion reached at paragraph 9.11 of my EIC and now **do not oppose** the rezoning relief sought for this site, **subject to** the refinement of the area of high landscape sensitivity, and the recommended additions to the provisions outlined above in relation to building height, setbacks, roading and infrastructure, and building materials and colours.

4. BENJAMIN ESPIE FOR CORBRIDGE ESTATES LIMITED PARTNERSHIP (31021)

4.1 Mr Espie has filed landscape assessment evidence in relation to the RVZ for this site (**“Corbridge”**). The information provided builds on the assessment provided within the original submission and addresses the recommendation at paragraph 11.11 of my EIC to undertake further assessment to identify the site’s landscape sensitivity. This rezoning request is located within the Rural Zone RCL, not the ONL.

4.2 Within Section 4 of his evidence Mr Espie outlines the basis and his rationale for RVZ sites being enabled and located outside of ONLs from a landscape perspective. At paragraphs 4.6 and 4.7 Mr Espie goes on to critique my EIC, stating that *“his brief did not include critically analysing this zone purpose”* (paragraph 4.6).

- 4.3** I was tasked by QLDC to assess the respective sites and submissions on their landscape merits generally within the bounds of the notified RVZ provisions for which being within an ONL was a key criterion.
- 4.4** Within Section 3 of her evidence in chief Ms Grace states that a RVZ zoning can feasibly apply to properties outside ONL areas and within RCLs subject to site specific assessment. There would obviously need to be changes to the RVZ zone purpose, and various objectives and policies within the RVZ, to appropriately recognise the location within a section 7(c) landscape.
- 4.5** Within paragraph 8.4 Mr Espie states that he does not agree “*with the implication that every site that has been identified for RVZ purposes must contain some areas of high and moderate-high landscape sensitivity*”. It is not the intention of the landscape analysis to seek out the higher landscape sensitivity areas, rather to assess each respective site on its particular attributes.
- 4.6** Given the above, having undertaken an assessment of the site and read the landscape assessment and evidence from Mr Espie, in my opinion, although it is outside an ONL but is within an RCL this site has specific attributes, characteristics and capacity in order for it to be considered for rezoning to RVZ. However, the site is currently Rural Zone RCL, and the measure (as directed in the strategic chapters of the PDP) is whether the RVZ provisions will ensure that landscape character is maintained and visual amenity values are maintained or enhanced, through future development.
- 4.7** Within paragraph 5.4 of Mr Espie’s evidence and Appendix 3, he provides a description and plan which illustrates the areas of high landscape sensitivity across the site. I note that the plan maps only show areas of high landscape sensitivity and does not provide a further breakdown to other areas of landscape sensitivity.
- 4.8** In my opinion, the areas identified as having a high landscape sensitivity are correctly identified. On this occasion, that being those areas of highest visual prominence and the least capacity to accommodate change.

- 4.9** However, I consider that there are areas within the site that demonstrate moderate-high landscape sensitivity, namely the western 'wedge' along the western boundary (north of the high landscape sensitivity area), the northern slopes adjacent to the internal lake and within a section of the elevated terrace south of the east-west spanning shelter belt within the centre of the site closest to SH6. This is again, largely down to their visibility, albeit setback from SH6.
- 4.10** As identified by the Structure Plan, these areas are largely free of future built form, however the western wedge includes AA1, and the southern terrace AA2 and part of the AA3. In my opinion, these areas should be identified with this landscape sensitivity as it will change the relative activity status of potential future development (should RVZ zoning be approved).
- 4.11** However, as an alternative to the identification of the RVZ landscape sensitivity areas, the proposal seeks a Structure Plan approach in order to provide a defined framework and series of 'activity areas' for future development of the site within an RCL.
- 4.12** In light of the site being within an RCL, the test then is whether the proposal maintains the landscape character, and maintains or enhances the landscape amenity values. Section '21.21.2 Rural Character Landscape (RCL)' within the proposed District Plan Decisions Version (Nov 19) provides a series of assessment criteria for proposed development within RCLs.
- 4.13** Mr Espie at his paragraph 5.6 provides a specific breakdown of the development that would be enabled by the relief sought, which is specifically addressed and arranged through the Structure Plan. This includes the golf course and an associated hotel and golf club, areas of open space, an open space road buffer, higher and lower density visitor accommodation, and fairway visitor and worker accommodation.
- 4.14** Golf courses in and of themselves are not uncommon elements within rural environments and, in my opinion, can be an appropriate form of development in settings such as the Corbridge site. However, it is often

the form, scale and intensity of the associated buildings that are required to be addressed in relation to potential effects on the landscape.

- 4.15** In relation to **landscape character**, I agree with Mr Espie at paragraph 6.5 that the site would change from farming and rural living to a node of recreation and visitor activity which will be set within large areas of open space. I also concur with Mr Espie at paragraph 6.7 that from a landscape perspective, nodes of visitor activity can sit within rural landscapes.
- 4.16** However, although a considered arrangement of the different activity areas has been designed through the Structure Plan, it is the anticipated scale and intensity of the buildings within these areas that could result in adverse effects on landscape character and visual amenity (discussed separately below).
- 4.17** Within Appendix 3 of his planning evidence Mr Daniel Curley (for Corbridge) provides recommended refinements to the notified RVZ provisions in relation to standards such as building height, building coverage (both single or combination of buildings), setbacks, building separation and the number of units across this site, and building materials and colours. These standards will provide for more built form on site than anticipated within the notified provisions.
- 4.18** The refined provisions are alluded to within paragraph 8.6 of Mr Espie's evidence but no specific assessment of them in the context of the site is provided. Mr Espie's evidence does provide a comprehensive outline of the proposal and, notwithstanding the general arrangement proposed, in my opinion, it is the scale and intensity of the development anticipated through the structure plan that will not maintain the landscape character of the RCL.
- 4.19** As outlined above in relation to the visibility of areas AA1, AA2 and AA3 within the western and southern reaches of the site, in my opinion, the potential development at the density anticipated within these areas will not maintain the landscape character. The design controls go some

way to offset these potential effects, however, it is the scale of the built form of most concern.

- 4.20** I consider that a provision could be included that identifies the maximum building coverages within each of the respective activity areas, e.g. there is currently no control that would stop the entire western arm of AA1, AA2 and AA3 being fully developed. In my opinion without this control, the RVZ would result in development that is of an inappropriate scale in this setting, which would degrade the character of the RCL and not maintain landscape character.
- 4.21** These additional measures would seek for the design to be of a scale and intensity that is compatible with the character of the landscape and would assist in maintaining landscape character values of the site.
- 4.22** Although the central portion of the site has less visibility, there will still be inherent effects on landscape character. The perception of the area will be that of a modified golf course landscape with associated buildings given the areas that will be visible. Also, the traffic movement and activity generated, intensity of use and potential effects of night lighting will impinge on the character of the area.
- 4.23** In relation to **visual amenity**, the Structure Plan has located future development into the parts of the site that are for the most part visually contained and discrete. This is predominantly within the central, lower parts adjacent to the lake. As such, existing topography and vegetation will largely screen and confine any views to this area from public viewpoints. The southern and northern parts of the site will also largely remain free of built form with open space buffers to the respective boundaries.
- 4.24** However, future buildings within the areas within the western and southern reaches of the site (AA1 and AA2), and the western extent of AA3 will be visible from SH6. The design controls proposed (including that suggested above) will assist with reducing the scale and intensity of development visible and the shelterbelts (to be retained) and topography will provide an element of screening. Also, the setback of

the activity areas from the road will assist in reducing the visual prominence of the future built form.

- 4.25** Within paragraph 7.3 Mr Espie states that *“careful treatment of the southern edges of the development areas at the time of subdivision design will mean that subdivision design will mean that highway users do not experience prominence of any built development and that a rural experience is maintained between the airport and Albert Town / Wanaka.”* However, there is no mechanism in place to ensure that this will occur.
- 4.26** I concur with Mr Espie in relation to his visual assessment from the northern, eastern and western edges of the site.
- 4.27** Having undertaken my assessment and reviewed the statement of Mr Espie, I consider that the submission provides a detailed structure plan with a considered arrangement across the site.
- 4.28** In relation to the assessment of the submission within an RCL as a Structure Plan, from a landscape perspective, in my opinion the scale and intensity of the development anticipated (as it currently stands) will not maintain the landscape character or the visual amenity values of the RCL.
- 4.29** As outlined above, these concerns could be appeased through the recommended provisions in relation to:
- (a) Amendment of the landscape sensitivity plan to include areas of moderate-high landscape sensitivity and the identification of buildings within these areas as discretionary activities; and
 - (b) Identification of maximum building coverages for each of the respective activity areas across the site.
- 4.30** Until such time as these are produced my assessment position has not changed and I remain **opposed** to the relief sought for this site.

REZONING REQUESTS - GENERAL INDUSTRIAL ZONE

5. TONY MILNE FOR CARDRONA CATTLE COMPANY LIMITED (3349)

5.1 Mr Milne has filed landscape evidence in relation to the GIZ for this site. A landscape assessment was not provided with the original submission.

RVZ relief

5.2 I understand that the RVZ zoning has not been pursued in the planning evidence filed on behalf of Cardrona Cattle Company, rather a General Industrial Zone is promoted.

5.3 While Mr Milne's evidence is focused on the GIZ zoning submission with limited detailed analysis of the RVZ component of the site, he provides a brief comment on the appropriateness of RVZ at paragraphs 47 and 48.

5.4 From undertaking my high level assessment and reviewing the RVZ Structure Plan Mr Milne proposes, in my opinion, it is largely appropriate from a landscape perspective. The proposal identifies areas of low, moderate, moderate-high and high landscape sensitivity and subsequently developable areas.⁴ However, in my opinion developable areas 3 and 4 are assessed as having moderate-high landscape sensitivity, largely due to their visual prominence.

General Industrial Zone relief

5.5 Otherwise Mr Milne's evidence supports a GIZ over the site.

5.6 Mr Milne's statement provides detailed and comprehensive analysis and assessment of the site and surrounding environment in relation to:

4 Refer Sheet 23 'RVZ Structure Plan' within Mr Milne's Graphic Attachment to his GIZ statement of evidence (3349).

- (a) The landscape values of the site and receiving environment;
- (b) The landscape attributes and values in relation to landscape character, rural character and natural character, amenity and visual amenity;
- (c) The identification of the site specific landscape opportunities and constraints; and
- (d) The landscape sensitivity (and the identification of GIZ Developable Areas as part of a Structure Plan).

5.7 Mr Milne's statement is thorough and I generally concur with the attributes and values of the site and receiving environment outlined. I make the following statements in relation to the assessment and submission.

5.8 I disagree with Mr Milne at paragraph 12 where he states that "*exotic shelterbelts, bunds and mitigation planting are typical elements of development across the flats*". In the context of the open landscape setting and rural environment, this matter is overstated.

5.9 The refinement of the proposed GIZ area, as outlined at paragraph 13 and on Sheets 14 and 15 of Mr Milne's appendix, provides a more contained site extent to be considered in relation to the potential GIZ future development on the site.

5.10 Although I agree that amenity values of the site are afforded by qualities of the surrounding landscape⁵ (e.g. borrowed amenity), in my opinion the site has qualities in its own right that provide values in and of itself, e.g. the open nature of the terrace / flats.

5.11 In my opinion at his paragraphs 14 (bullet 5) and 15 (bullet 4), Mr Milne overstates the effect on amenity and the proximity and 'coexistence' that the adjacent landfill and rock excavation operation have on the subject site. These existing operations are visually discrete and are secondary to the wider landscape attributes and environment. They are not immediately obvious in the context of the surrounding environment.

5 Refer paragraph 14 (bullet 4) of Mr Milne's evidence.

- 5.12** At his paragraphs 15 and 30, in my opinion Mr Milne underplays the visibility of the site especially in relation to those views afforded from State Highway 6. The majority of the north site and the eastern reaches of the southern site will be visible for long stretches along SH6. I discuss potential visibility in relation to future development later in my statement.
- 5.13** The site is located within an ONL. I do not agree that the measurement threshold for the site is a *“pristine natural landscape”* as implied by Mr Milne in paragraph 15 (bullet 3). At paragraph 40 Mr Milne states that the site itself is *“neither particularly outstanding nor natural in an aesthetic or ecological sense”*. Irrespective of the above, in my opinion, the threshold is against whether future development will protect the landscape values of the ONL. If it will protect the landscape values, then it will be appropriate (from a landscape perspective).
- 5.14** In my opinion, the three constraints that Mr Milne outlines within paragraph 16 provides the key reasons as to why GIZ zoning and the future development enabled is inappropriate for this site. This is in relation to:
- (a) The sites partial location within an ONL;
 - (b) The sites partial location within the Gibbston Character Zone (**GCZ**); and
 - (c) The rural character of the site and surrounds which is inconsistent with the form of the development anticipated by the GIZ.
- 5.15** At paragraph 19 Mr Milne states that *“large-scale changes which introduce new or uncharacteristic features into the landscape or view are likely to have a more significant effect than small changes involving features already present within the landscape or view”* and goes on appraise the existing modification to the existing environment.
- 5.16** In my opinion, the GIZ proposal⁶ and the development potential enabled will provide a *large scale change* and *introduce new and uncharacteristic features* into this landscape. Although I acknowledge

6 Refer paragraphs 22 – 26 of Mr Milne’s evidence.

the site has been subject to human modification, the landscape values of the site and surrounding landscape will be adversely affected by development which will be inconsistent with the surrounding environment and will not serve to protect the landscape values of the ONL. The GIZ is an urban form of development.

- 5.17** The recommended provisions provide a series of bespoke standards related to the proposed General Industrial Areas 1, 2 and 3 (“**GIA**”) which are located within the areas of low and moderate landscape sensitivity. The provisions relate to building height (6m, 7m and 10m with an exception for 12m towers) within the respective GIAs⁷.
- 5.18** The building heights, although responsive to the different GIAs, in conjunction with the proposed 80% maximum site coverage and no specific provision for building design will result in the introduction of an inappropriate urban form and scale of development within this rural setting, within an ONL.
- 5.19** Further to this point, within paragraphs 23 and 41 “*small scale industrial uses*” and “*low density development*” is described. Again, no specific provisions are provided which would ensure this scale of development.
- 5.20** Although the proposal includes building setbacks, mitigation planting and green corridors which will provide a positive outcome and an element of enhanced amenity to the site, these measures do not appear to have provisions outlining specific plant species, density or anticipated heights, or the setback distances that will provide the mitigation anticipated. As such, there is no guarantee that it will serve its intended purpose, particularly around protecting the landscape values of the ONL.
- 5.21** Within paragraphs 23 – 25, Mr Milne describes the respective GIAs in relation to their visibility and anticipated building heights and controls in relation to form and colour. At paragraph 23, controls related to building form and colour are alluded to by Mr Milne, however I am unaware of any specific provisions outlining these measures and

7 Refer paragraphs 23 – 25 of Mr Milne’s evidence.

therefore, again, these controls are not guaranteed for future development.

- 5.22** In order to seek to control the building design, coverage, external appearance and materials and colours of future development across the site a series of specific design standards should be proposed. In my opinion, the existing provisions do not go far enough to protect landscape values the ONL, particularly when considering the scale of development anticipated.
- 5.23** At paragraph 25, Mr Milne states that GIA 3 is not visible due to being located internal to the development and setback from SH6. The ZTV undertaken provides topographical analysis of the visibility of the site and surrounding area. It is unclear as to whether the analysis is to the respective ground level of the receiving environment, but it is assumed so. As such, the respective 6m, 7m and 10m (up to 12m) height allowances for the respective GIAs will provide a different level of visibility analysis outcomes. Although I agree that the locations are somewhat discrete, I consider that there will likely be visibility of the built form at the scale enabled by the recommended provisions. As such, I consider that the site will not be able to absorb the scale of development to the extent that Mr Milne describes.
- 5.24** Further to this point, the CCCL site is located at the 'gateway' entry to the District. When travelling west along SH6 toward Queenstown from Cromwell, when one comes around the sweeping corner the GIZ site will be immediately visible and in my opinion, development at the scaled anticipated within the GIAs will not be in keeping with the landscape character of the area and will not protect the values of the ONL.
- 5.25** At paragraph 31 Mr Milne states that the *"key consideration is that future development will not compromise the underlying landscape values of the ONL nor the visual amenity and landscape character of the rural landscape as experienced from State Highway 6"*. In my opinion, the values will be compromised and the proposal will not protect the landscape values of the ONL. It introduces an urban element and activity to the site at a scale (height and coverage) which

is inappropriate in this setting and out of character resulting in adverse effects on landscape character. Although Mr Milne states that some of the GIA's will not be visible, where they are visible they will be seen out of context and result in adverse effects on visual amenity.

- 5.26** Although some of the sites have less visibility, there will still be inherent effects on landscape character. The perception of the area will be that of an industrial nature, given the areas that will be visible. Also, the traffic movement and activity generated, intensity of use and potential effects of night lighting will impinge on the character of the area and will not protect the landscape values of the ONL.
- 5.27** At paragraph 37 in relation to the surrounding environment, Mr Milne states that *“the landform has high legibility and naturalness and provides a sense of enclosure and scenic quality”*. I agree with this statement. In relation to the proposal though, the openness of the site and broader Victoria Flats provides unique characteristics which complement but also contrast the mountainous setting. The GIZ development anticipated across the site, will detract from the openness and landscape character and values associated with the area.
- 5.28** Within paragraph 44 Mr Milne states that the site and area has considerable human modification which is absorbed by bunding and shelterbelt planting. I acknowledge this statement, but the development to date has retained an open landscape character.
- 5.29** In my opinion, the proposal will further modify the landscape at a different scale (not common or anticipated in the area) and introduces urban elements. The development anticipated by the GIZ cannot be compared to low density farm buildings and large sheds. The provisions requested will provide built form that could cover 80% within the respective GIAs which is of an incomparable scale, and will not introduce new standards to be achieved for future buildings, particularly for this setting.
- 5.30** At paragraph 45, Mr Milne states that the more visible parts of the site will be subject to more design controls. There are no provisions

outlined within the landscape statement or the planning evidence of Mr Giddens that will provide the level of control implied by Mr Milne.

5.31 Having undertaken my assessment and subsequently having reviewed the statement of Mr Milne, although the submission provides a detailed structure plan with considered arrangement on the site, for the reasons outlined above my assessment position has not changed and I remain **opposed** to the relief sought for this site. In my opinion, the proposed GIZ will not protect the values of the ONL and it is inappropriate in this setting from a landscape perspective.

A handwritten signature in black ink, appearing to read 'M Jones', with a stylized flourish extending downwards.

Matthew Stuart Bentley Jones

19 June 2020