

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 **CORBRIDGE ESTATES LIMITED PARTNERSHIP**
Submitter (31021)

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

29th MAY 2020

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 management 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 various parts of the Upper Clutha Basin, in relation to a number of proposed plan changes in the area and in relation to many resource consent applications.
- 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 the relevant parts of a Section 42A report prepared by Ms Emily Grace on behalf of the QLDC and a statement of evidence prepared by Mr Mathew Jones. I have also considered Part 2 Strategy (Chapters 3 to 6) of the decisions version of the Proposed District Plan (**PDP**) and the associated interim decisions of the Environment Court that relate to this part of the PDP¹.

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 31021 on the Proposed District Plan. In relation to this submission, I have been asked by the submitter to prepare evidence regarding the landscape and visual effects of the proposed area of Rural Visitor Zoning (**RVZ**) on the Corbridge Estates land on State Highway 6 (**SH6**).

3. EXECUTIVE SUMMARY

- 3.1 The proposed RVZ sits in a non-ONL landscape between Wanaka Airport and Albert Town / Wanaka. A Structure Plan approach is used in order to avoid development in the more sensitive parts of the site and to enable a particular configuration of development that includes golf activity and considerable open space.
- 3.2 In relation to effects on landscape character and also effects on views and visual amenity, I consider that the relief sought is appropriate. I consider that the concerns that have been raised by Mr Jones are alleviated by the specifics of the relief and by the specifics of the site itself.

4. RURAL VISITOR ZONING THAT IS NOT WITH AN OUTSTANDING NATURAL LANDSCAPE

- 4.1 Pursuant to the ODP, areas of RVZ were identified at Cecil Peak, Walter Peak, Cardrona, Blanket Bay, Arthurs Point, Arcadia Station and Windermere. Six of those eight locations were within landscapes that came to be identified as ONLs. The RVZs that were not within ONLs

¹ 1 Environment Court decisions [2019] NZEnvC 160, 205 and 206.

were Arthurs Point and Cardrona. The ODP RVZ provided for buildings, commercial recreation and visitor accommodation as controlled activities. Residential activity was permitted (although buildings were controlled), hence the ODP RVS envisaged residential activity sitting alongside visitor activities.

- 4.2 Sections 12.3.1 to 12.3.3 of the ODP describe the purpose of the RVZ. In summary it is to provide for areas of commercial visitor activities set within rural landscapes. The areas of RVS:

“... provide employment opportunities, retention of local heritage values and resources, as well as operate as a significant part of the visitor industry.

...

The visitor areas are effectively part of the wider rural environment and as such their relationship with the rural area, its resources and amenities is important. It is appropriate they receive recognition in the District Plan where this will provide a mechanism to ensure an acceptable level of amenity, within the rural visitor area and in the surrounding rural areas”.

- 4.3 The notified Stage 3b PDP has changed the RVZ at Cardrona and Arthurs Point to Settlement or Residential zoning and has deleted the zoning at Windemere (adjacent to Wanaka Airport)², such that there are now four notified areas of RVZ in the district and they are all within ONLs. Residential activity is now non-complying and the purpose of the zone has been changed so that it expressly provides for visitor activities within ONLs.

- 4.4 In very broad terms, tourism and visitor activities provide a large measure of the District’s economic well-being. I understand that a sector of the tourists that come to the district seek a non-urban visitor experience; i.e. accommodation and/or tourism activities in a rural location. Essentially, I understand that the RVZ exists to appropriately cater for this part of the tourism market.

- 4.5 In relation to the Part 2 of the PDP (Strategy)³, Chapters 3 and 6 make it clear that the ONLs are the most highly valued landscapes of the district, while the non-ONL rural landscapes (RCLs), are less valued (although still have some important character and amenity associated with them). This is logical and it reflects the relevant parts of the RMA. I can therefore see no

² I understand that a live submission seeks the reinstatement of this RVZ.

³ Taking into account the interim decisions of the Environment Court.

logical landscape planning reason why the PDP should be formulated so as to provide for rural visitor activity only within ONLs and not in other rural landscapes, particularly less sensitive rural landscapes. I consider that there is currently a tension between the notified purpose of the RVZ and Chapters 3 and 6. Logically, areas of RVZ should sit in locations within the district's rural landscapes where they can be located and configured so as to uphold the Objectives and Policies of Chapters 3 and 6, regardless of whether they are within an ONL or a non-ONL. In fact, in terms of usefulness, efficiency and appropriately managing the district's landscape character, it seems that areas of RVZ in rural locations that are not within ONLs and are less remote, are likely to be very advantageous (in relation to practical considerations but also in relation to appropriately maintaining the character of the ONLs). From a landscape planning perspective, I therefore am supportive of including areas of RVZ outside of the district's ONLs.

- 4.6 Mr Jones' evidence does not consider the issue of whether, from a landscape planning perspective, it is appropriate or advisable to include some areas of RVZ outside of ONLs. He has simply adopted the notified RVZ's purpose of being to provide for "*visitor industry activities in remote locations within Outstanding Natural Landscapes*"⁴. It appears that his brief did not include critically analysing this zone purpose in relation to landscape planning.
- 4.7 A consequence of the above is that when Mr Jones comes to set out his factors for determining whether the site of a submission seeking zoning is a "*fundamental fit*" with the RVZ, he includes "*whether the site is located within an ONL and has a remote character*" as a factor that works in favour of a potential RVZ site⁵; and when he comes to consider the Corbridge site, he lists the fact that the site is not within an ONL as a factor that works against the submission⁶. As I set out above, this finding appears to have come from an uncritical adoption of the notified RVZ purpose, rather than being informed by landscape planning considerations.
- 4.8 Ms Grace considers the issue of whether RVZs can appropriately be located outside of ONLs in Section 3 of her Section 42a report. Her consideration is expectedly from a planning perspective and she ultimately concludes that RVZs can appropriately be located outside ONLs. From a landscape perspective, I agree for the reasons set out in my paragraphs 4.3 to 4.5 above. It is contrary to logical landscape planning that visitor activities in rural areas should be provided for only in particularly sensitive and remote locations.

⁴ PDP (notified Stage 3b version), Section 46.1.

⁵ Second statement of evidence of Mathew Stuart Bentley Jones, dated 18 March, paragraph 5.2.

⁶ Ibid, paragraph 11.10.

5. THE PROPOSED AREA OF RVZ

- 5.1 Corbridge Estates Partnership Limited (**Corbridge**) own a 322ha landholding adjoining State Highway 6 (**SH6**) near Wanaka Airport. Pursuant to the Operative District Plan (**ODP**), the Corbridge land (**the site**) is zoned Rural General Zone (**RGZ**) and is not within an identified Outstanding Natural Landscape (**ONL**). Pursuant to Stage 1 of the PDP, the Corbridge land is zoned Rural Zone (**RZ**) and is within a Rural Character Landscape (**RCL**).
- 5.2 Resource consent RM120572 provides for subdivision of the site to create a 35-lot rural living development. The RM120572 development concentrates rural living activity around the more hidden, central part of the site and also on the top of the north-facing escarpment at the northern end of the site. Considerable native planting and ecological management form part of the consented development. Resource consent is also held for a function venue within the site (RM150918) allowing up to 65 events per year of varying lengths and time of day.
- 5.3 Through its submission Corbridge sought RVZ zoning of the site and some amendments to the provisions to support that. Through the preparation of evidence Corbridge have further refined the relief sought. In summary, the amended relief is that:
- i. The purpose of the RVZ be amended such that areas of RVZ should be enabled within RCLs and well as ONLs;
 - ii. The RVZ is applied to the Corbridge land, subject to a specific Structure Plan and some further specific provisions to support development in accordance with the structure plan and control the location and scale of activities to manage their effects, particularly on landscape. I attach the proposed Structure Plan to this evidence as Appendix 2. It has been configured to provide for a large area of commercial recreation in the form of a golf course with visitor accommodation/residential land use adjacent to the fairways, a hotel and other denser (potentially terrace-style) visitor accommodation development, as well as a village of residential land use to provide on-site staff accommodation, including staff involved in construction of the zone's activities.
- 5.4 In his evidence, Mr Jones supports the notion that within the district's identified RVZs areas of "high" and "moderate-high" landscape sensitivity should be identified and more restrictive

provisions should apply to these areas⁷. I have undertaken an analysis of the site to identify the areas of high and moderate high sensitivity. Those areas have been identified as per Appendix 3 to this evidence. Having undertaken this analysis, the structure plan approach being promoted by the Corbridge submission goes further by providing a higher level of detail with respect to the development than can occur within the site in light of the areas of sensitivity.

5.5 As I discuss further in relation to Mr Jones' evidence (in my paragraphs 8.4 and 8.5), in relation to landscape sensitivity, it is important to note that the site is within an RCL and not an ONL. The relevance of this is that the notified RVZ provisions were formulated only for sites within ONLs. Notwithstanding that, sites within an RCL obviously can still have areas of variable sensitivity within them. Given that RCL sites are generally not as high in natural character as those in an ONL, areas of high sensitivity within an RCL are generally areas that contribute significantly to a rural or pastoral character and/or that contribute to rural views and visual amenity.

5.6 The effect of the Structure Plan is to largely avoid built development taking place in the more sensitive parts of the site and those that contribute to the landscape values of the surrounding area. The Structure Plan is such that denser development would be enabled in the central, hidden part of the site. Golf fairways will take up much of the site, including the northernmost escarpment-top area. The detail of the provisions that will regulate development within the zone are given in the evidence of other witnesses, however, in summary, the development enabled by the relief would consist of:

Open Space Road Buffer: An area of the zone to be retained as open space with specific requirements for landscape treatment to provide buffering in relation to the highway and to provide a corridor of open, rural character for highway users.

Open Space: Parts of the zone to remain as undeveloped open space, primarily for internal amenity purposes.

Higher Density Visitor Accommodation: Detached and terrace-style visitor accommodation and associated facilities, placed on the north facing slopes beside the internal lake in a location that is significantly hidden from outside the site.

⁷ Ibid, paragraphs 4.3 to 4.6.

Low Density Visitor Accommodation: Individual dwellings/villas to be used for visitor accommodation purposes, placed on broad, flat parts of the site, allowing good views and amenity from these locations while remaining inconspicuous from outside the site.

Hotel and Golf Facilities: Hotel development with associated facilities and a golf clubhouse. Car parking and all accessory activities also to be provided for. These activities are proposed in a central, relatively low-lying part of the site that is particularly hidden.

Golf Course: An 18-hole, international standard golf course and Par 3, nine-hole golf course.

Fairway Visitor Accommodation: Fairway-side dwellings/villas to be used for visitor accommodation and to be integrated into the design of the golf course.

Worker Accommodation: An integrated village of residential accommodation including community facilities, at a density akin to the Low Density Residential Zone. Able to be used for development workers (staff of the visitor accommodation facilities and also workers engaged in the construction and maintenance of the site overall), airport-associated workers and, in time, more general occupation. This Activity Area is located on north-facing rolling terrace land that avoids prominence from outside the site.

- 5.7 Under the proposed relief, I understand that development that accords with the Structure Plan is discretionary in relation to subdivision and controlled in relation to buildings. Visitor accommodation is permitted in the various visitor accommodation Activity Areas and residential activity is permitted within the Worker Accommodation Activity Area and a portion of the Fairway Visitor Accommodation Activity Area. Discretionary consent will also be required in relation to earthworks to form the lake and golf course. Overall, a development resource consent application that accords with the Structure Plan would be discretionary at least.

6. EFFECTS ON LANDSCAPE CHARACTER

- 6.1 The site extends between SH6 at its southern end to the corridor of the Clutha River at its northern end. It sits on undulating, rolling terrace land between Wanaka Airport (close to the site to the southeast) and Albert Town / Wanaka (approximately 3km to the northwest). The part of SH6 that adjoins the site provides the primary vehicle link between Wanaka and the airport, and also onwards to Luggate and Cromwell.

- 6.2** The Wanaka Airport is provided for by a designation in the ODP and by an area of Airport Zone in the PDP. The ODP includes the Windemere RVZ immediately adjacent to the Wanaka Airport and this is rezoned to Rural Zone in the PDP (although I understand that there are submissions relating to this issue).
- 6.3** In relation to landscape character, the site itself is comprised of rolling landform, generally rising in elevation from SH6 towards the north, before dropping precipitously to the Clutha River. There is a significant area of lower elevation in the centre of the site where a lake and the densest development is proposed. A number of tall mature shelterbelts break up the site and a network of farm tracks and fences cross it. While the land use is dominated by cultivated improved pasture, there are areas of remnant native vegetation. A collection of farm / utilitarian buildings (including a dwelling) are located close to SH6 in the southern part of the property. Overall, the site has a verdant, improved rural character associated with open space and agricultural management. In paragraph 11.5 of his evidence, Mr Jones notes that the site is relatively open and allows long views to the surrounding ranges. This is correct but the rolling and variable topography of the site means that large parts of the site itself are visually hidden.
- 6.4** Comparing the proposed relief to the existing situation (i.e. development provided for by the RZ and RM120572), the proposed relief will provide for denser development. The interior of the site will become a visitor accommodation vicinity with a hotel, golf club house, and visitor accommodation buildings centred around a lake and associated open space areas. Detached villas would follow parts of the golf fairways. Two areas towards the northern and southern parts of the site would provide for detached visitor accommodation dwellings/villas in a high-amenity setting. The Worker Accommodation Activity Area would develop as a more compact built environment with its own amenities.
- 6.5** In terms of landscape character, the relief sought would change the site from a farming site or a rural living site (taking account of RM120572) to a node of commercial recreation and visitor activity surrounded by rural landscape. However, this node of visitor activity would feature considerable open space in relation to internal amenity and also in relation to greenspace beside the highway and river corridor. As will be discussed in relation to views and visual amenity below, the node of activity will be considerably contained in a visual sense.

6.6 Currently, low density rural living activity coupled with farmed pasture extends between Wanaka Airport and Albert Town / Wanaka. The visitor activity node would sit somewhat centrally in this area of the Upper Clutha Basin and immediately to the north of fourteen 40ha blocks that are centred around the Ballantyne Rd / SH6 intersection.

6.7 The landscape character of the area between the airport and Albert Town / Wanaka would remain dominated by rural character, albeit that a relatively intense node of visitor activity would sit within it. I consider that, subject to consideration of visual effects, the proposed relief would not significantly endanger rural character in a setting of this sort. Nodes of visitor activity can sit comfortably within rural landscapes⁸. This, after all, is why a RVZ is included in the ODP and PDP. In relation to landscape character, this particular rural landscape setting is more able to absorb a node of visitor activity than most settings within the rural landscapes of the district in my opinion. This is primarily because:

- The site is not within an ONL; it is in a less sensitive location in relation to the district's rural landscapes, in a vicinity that accommodates a reasonable degree of human modification and occupation;
- The site is adjacent to a State Highway and between Wanaka Airport and Albert Town / Wanaka. In terms of the patterns of activities that make up landscape character, there is considerable logic and expectation of some non-rural / semi-rural activities in a location of this sort. Given the strong golf component of the proposed relief, an activity of this sort can only be placed in rural or semi-rural locations; it cannot be placed in suburban or urban locations.
- The site itself is large enough and topographically varied enough so that development can occur in a way that visual prominence is avoided and an outwardly open, green, rural character is perceived.
- A Structure Plan spatially manages activities within the area of RVZ such that more intensive activities are contained in the central, topographically contained area of the site while the peripheral parts of the site are kept in an open and unbuilt state. This method addresses potential effects of the development on surrounding landscape character and amenity.

⁸ Examples in the district range in size from Blanket Bay and Aroha Retreat to Gibbston Valley Winery to Millbrook Resort.

- 6.8 Overall, I consider that in relation to managing the landscape character of the district into the future, there is considerable logic in the specific type of development that is proposed being located on this site, and that while the landscape character of the site and its immediate context will change, this change will not be adverse.

7. EFFECTS ON VIEWS AND VISUAL AMENITY

- 7.1 In relation to views and visual amenity, much of the site is considerably hidden from outside views due to topography. Views into the main central part of the site are very difficult to gain. The outer parts of the site (particularly a sweep of land adjacent to SH6 and a steep escarpment that faces the Clutha River) provide visually displayed open space.
- 7.2 The rolling and undulating topography of the site means that much of it is well contained in a visual sense. The various mature shelterbelts also assist with visual screening of much of the site. The intention is to maintain these shelterbelts into the future and to provide for their incremental replacement/succession. Proposed provisions are included to this effect.
- 7.3 SH6 passes the southern end of the site and views are available over the southern part of the site that sits at approximately the same elevation as the highway. This part of the site will remain as open space pursuant to the proposed draft Structure Plan and the landscape treatment of this area is envisaged as maintaining a rural, open form of visual amenity for highway users. Existing shelterbelts and topography visually separate the proposed development Activity Areas from the highway corridor. These development Activity Areas face north, away from the highway and it is envisaged that careful treatment of the southern edges of these development Activity Areas at the time of 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.
- 7.4 In relation to the northern part of the site, the proposed structure plan keeps any built development further back from the northern escarpment edge than the RM120572 situation. To the north of the site, across the Clutha River, is the large dairy farm of Devon Dairies Ltd, which is a working property with no public access. However, following the northern bank of the Clutha is the public Newcastle Track. This track is at a considerably lower elevation than the top of the

northern escarpment within the site, such that views of the escarpment itself and also its upper lip are available from the track, but no visibility of the flatter terrace land of the subject site are available. While the RM120572 would locate built form near the lip of the escarpment such that it would be visible from the Newcastle Track, the proposed Structure Plan locates golf fairways in this part of the site. This will better maintain the landscape character and amenity of this area.

- 7.5** The eastern and western edges of the site are considerably lined by mature shelterbelts that restrict views from neighbouring land into the site. Topography also very considerably restricts views. As with the consented RM120572 development, the proposed relief generally locates development towards the centre of the site such that views from the neighbouring properties to the east and west are largely maintained in their current state.
- 7.6** In practical terms, the ability to visually experience the site is limited to views from the Newcastle Track to the northern escarpment of the site (which is proposed to remain undeveloped), and to views of the southern part of the site from SH6. As discussed, from SH6 an open, considerably rural aesthetic will be maintained. An observer of this stretch of highway will certainly have awareness of some development within the site, there will after all be a road entry, but built form will be only visible in a peripheral way and open pasture will dominate; something like the appearance of passing the Jacks Point area, although on a much smaller scale.
- 7.7** In relation to views and visual amenity, I again find that the site has good capacity to absorb the proposed development potential without inappropriately degrading the visual experience of the landscape that is currently had by observers. Visual amenity will not be significantly diminished.

8. THE EVIDENCE OF MR JONES

- 8.1** I have given some comments above regarding the parts of Mr Jones' evidence that deal with the RVZ in general terms.
- 8.2** In relation to the submission site specifically, Mr Jones finds that the site is not suitable for RVZ (both in relation to the notified RVZ provisions and the specific relief sought by the

submission)⁹. According to Mr Jones, attributes of the site that mean it is not suitable for RVZ treatment include:

- (a) *The site is not located within an ONL.*
- (b) *The localised proximity to Wanaka Airport, Albert Town and Wanaka township reduces the remoteness of the site. This is also exacerbated by the traffic movement along State Highway 6.*
- (c) *The site is not situated in a visually discrete location.*
- (d) *Although it has a number of attributes that contribute to potential development opportunities, the site is, in my opinion, not appropriate for RVZ without the assessment and determination and breakdown of landscape sensitivity areas across the site. Another zone may be more appropriate for the development envisaged for the property.*
- (e) *The site and surrounding properties have managed agricultural use and display a modified character.*
- (f) *The comparatively limited amount of vegetation along the site boundaries allows for a more open character with long distance views being available¹⁰.*

8.3 Mr Jones goes on to conclude that the relief sought cannot be considered to be appropriate unless the subject site is assessed and broken down in relation to landscape sensitivity ratings (taking into account attributes, opportunities and restraints) and then refining the structure plan to reflect the resultant sensitivity ratings.

8.4 The notified RVZ provisions include specific provisions that apply to areas of "high landscape sensitivity" and "moderate-high landscape sensitivity". As mentioned, the notified RVZs are all contained within identified ONLs. I do 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; they may not, depending upon where they are located and how they have been configured. Again, I note that the notified RVZ provisions were formulated to relate to locations that are all within identified ONLs. The submission site is not within an ONL and therefore, by definition, it is less sensitive (in terms of landscape issues) than the sites that the RVZ provisions were formulated for.

⁹ Ibid, paragraph 11.7.
¹⁰ Ibid, paragraph 11.10.

- 8.5** Notwithstanding the above, certainly some parts of the Corbridge site are more sensitive than others, and contribute to the wider landscape character of the area. In terms of landscape character and land use, the site itself is relatively uniform; broad, rolling, relatively verdant pasture. Rather than landscape character factors (such as the presence of areas of particularly natural character), it is visual exposure that makes parts of the subject site more sensitive in this case. This landscape sensitivity (along with various other factors) contributed to the formulation of the proposed structure plan. I attach to this evidence as Appendix 3, a plan showing the parts of the site that have high landscape sensitivity. As explained, these are largely the parts of the site that are visually exposed; the broad, open rolling area that can be easily seen from SH6 and the locally elevated escarpment-top area at the northern end of the site. The proposed structure plan has been formulated to keep these parts of the site free of development so that they can continue to support the landscape character and amenity values of the local RCL.
- 8.6** The notified RVZ provisions do not restrict building coverage. They give a discretionary status to built development within areas of moderate-high landscape sensitivity within the RVZs, and non-complying status to built development within areas of high landscape sensitivity. This is a relatively simple regime of provisions and, while it is entirely appropriate for some sites, the provisions being proposed for this site have gone considerably further and are more refined in terms of how they regulate development; they include a specific structure plan. Therefore, I consider that further mapping of landscape sensitivity is unnecessary as the outcome sought to be achieved by doing so is inherent in the structure plan approach being adopted by Corbridge. The specifically located activity areas, and the provisions that are proposed to relate to them, can be assessed. I have done so and, as set out above, consider the outcomes of the proposed relief to be appropriate.
- 8.7** With reference to Mr Jones' concerns set out in my paragraph 8.2 above, I see no logical landscape planning reason why visitor facilities in rural locations should only be provided within "remote" locations within identified ONLs in this district. I suggest that in relation to broad scale planning, a rural, farm-like location accessed by a main highway, close to Wanaka airport is an ideal location for rural visitor activities. It is a location in which sensitively configured rural visitor development is much more likely to accord with landscape character and visual amenity than in remote or ONL locations.

- 8.8** I accept that the subject site as a whole is not visually discrete; it is not distinct from its surroundings nor is it within some contained landform. Again, I consider that this is a factor in favour of a structure plan approach. While the site as a whole is not contained or separate from its immediate context, the structure plan concentrates development in the central part of the site that is topographically contained and also surrounds areas of built development with golf or open space activity areas that will contain the built form. With reference to item (f) of Mr Jones' factors that work against RVZ development of the subject site (as cited in my paragraph 8.2), I agree that relative openness allows some long views across parts of the site. The proposed relief appropriately preserves these parts of the site in their current open pasture state, retaining an open and rural form of visual amenity for highway users, retaining the countryside aesthetic between Wanaka airport and Wanaka / Albert Town.
- 8.9** With reference to Mr Jones' item (e), I cannot see that the managed agricultural character of the context within which the subject site sits works against the proposed relief. The fact that the landscape in question is a somewhat modified rural landscape in which buildings and instances of rural living are present, simply means that well-configured rural visitor activities will be less discordant with existing landscape character than they would in less modified landscape settings.
- 8.10** Overall in relation to Mr Jones' evidence, I consider that the details of the relief that is sought avert his concerns. The sensitive parts of the site will not be affected by the proposed relief, in fact they will be more protected than under the RZ and with respect to the river escarpment more protection is afforded than RM120572. The structure plan will enable a configuration of development that has been formulated specifically for the site in that built development will be inconspicuous and will not be out-of-place or offensive in its context. The specifics of the site and the proposed structure plan mean that enabled development will accord with landscape character and visual amenity in this location much more than they would in more remote and sensitive rural parts of the district.

9. CONCLUSIONS

- 9.1** The proposed Corbridge RVZ is not within an ONL. It is in rural farmland between Wanaka Airport and Wanaka / Albert Town. By definition, non-ONL landscapes are less sensitive than ONL landscapes. With reference to Chapters 3 and 6 of the PDP, I can see no logical landscape planning reason why the PDP should be formulated so as to provide for rural visitor activity only within ONLs and not in other rural landscapes, particularly less sensitive rural landscapes.
- 9.2** The proposed relief uses a Structure Plan that has been specifically formulated based on landscape sensitivity in order to configure development. The result is that denser development is concentrated in the central, topographically hidden part of the site and that the more exposed and sensitive parts of the site are kept in an undeveloped rural state.
- 9.3** In relation to landscape character, the proposed zone will not significantly endanger the rural character of the landscape within which the site sits. Nodes of visitor activity can sit comfortably within rural landscapes, as is evidenced by the inclusion of a RVZ in the ODP and PDP. The subject site itself is more able to absorb a node of visitor activity than most settings within the rural landscapes of the district because:
- it is not within an ONL;
 - it is large and topographically varied enough such that such that an outwardly open, green, rural character is maintained via the use of a Structure Plan approach;
 - it is in a location (adjacent to a State Highway, airport and area of rural living land use) such that some non-rural / semi-rural activity will be less incongruous than in most rural locations;
- 9.4** In relation to visual effects, the ability to visually experience the site to any significant degree is limited to views from the Newcastle Track to the northern escarpment of the site and views of the southern part of the site from SH6. The proposed Structure Plan has been formulated such that the visually exposed parts of the site will be free of built development. Some specific provisions relate to the Open Space Road Buffer Activity Area in order to maintain a rural character as experienced by highway users. Council controls/discretion at the time of subdivision or development will allow specific landscape design to be considered such that it can be used to further mitigate potential visual effects. Overall, I consider that visual effects will be very well mitigated.

- 9.5** The details of the relief that is sought and the specifics of the site itself avert the concerns raised by Mr Jones in my opinion. The sensitive parts of the site will not be affected and will be more protected than under the RZ. The structure plan approach will mean that the development that is enabled will be inconspicuous and not out-of-place or offensive in its context.

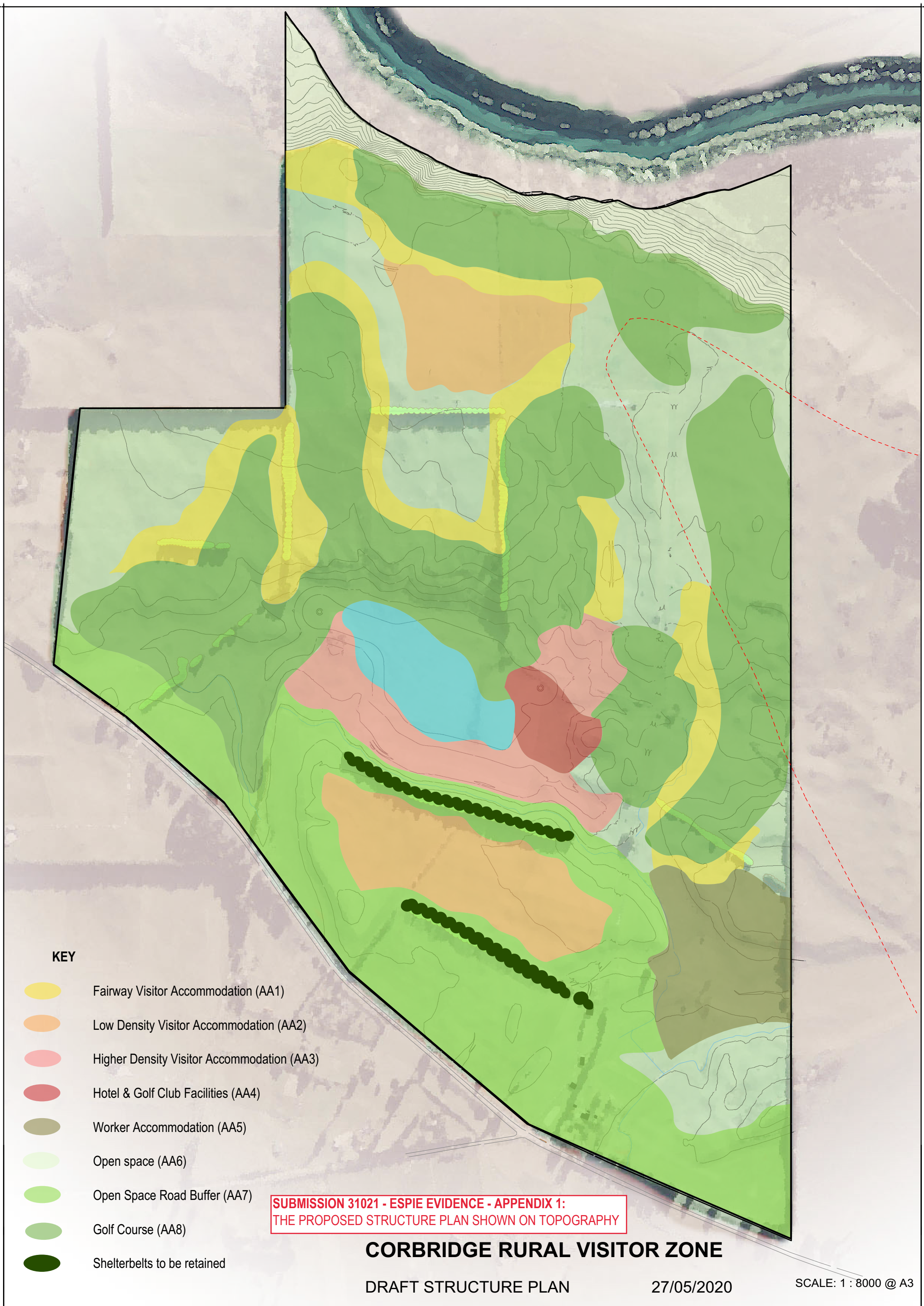
ATTACHED APPENDICES

- 1 THE PROPOSED STRUCTURE PLAN SHOWN ON TOPOGRAPHY.
- 2 THE PROPOSED STRUCTURE PLAN.
- 3 AREAS OF HIGH LANDSCAPE SENSITIVITY.

Ben Espie

vivian+espie

29th May 2020



KEY

- Fairway Visitor Accommodation (AA1)
- Low Density Visitor Accommodation (AA2)
- Higher Density Visitor Accommodation (AA3)
- Hotel & Golf Club Facilities (AA4)
- Worker Accommodation (AA5)
- Open space (AA6)
- Open Space Road Buffer (AA7)
- Golf Course (AA8)
- Shelterbelts to be retained

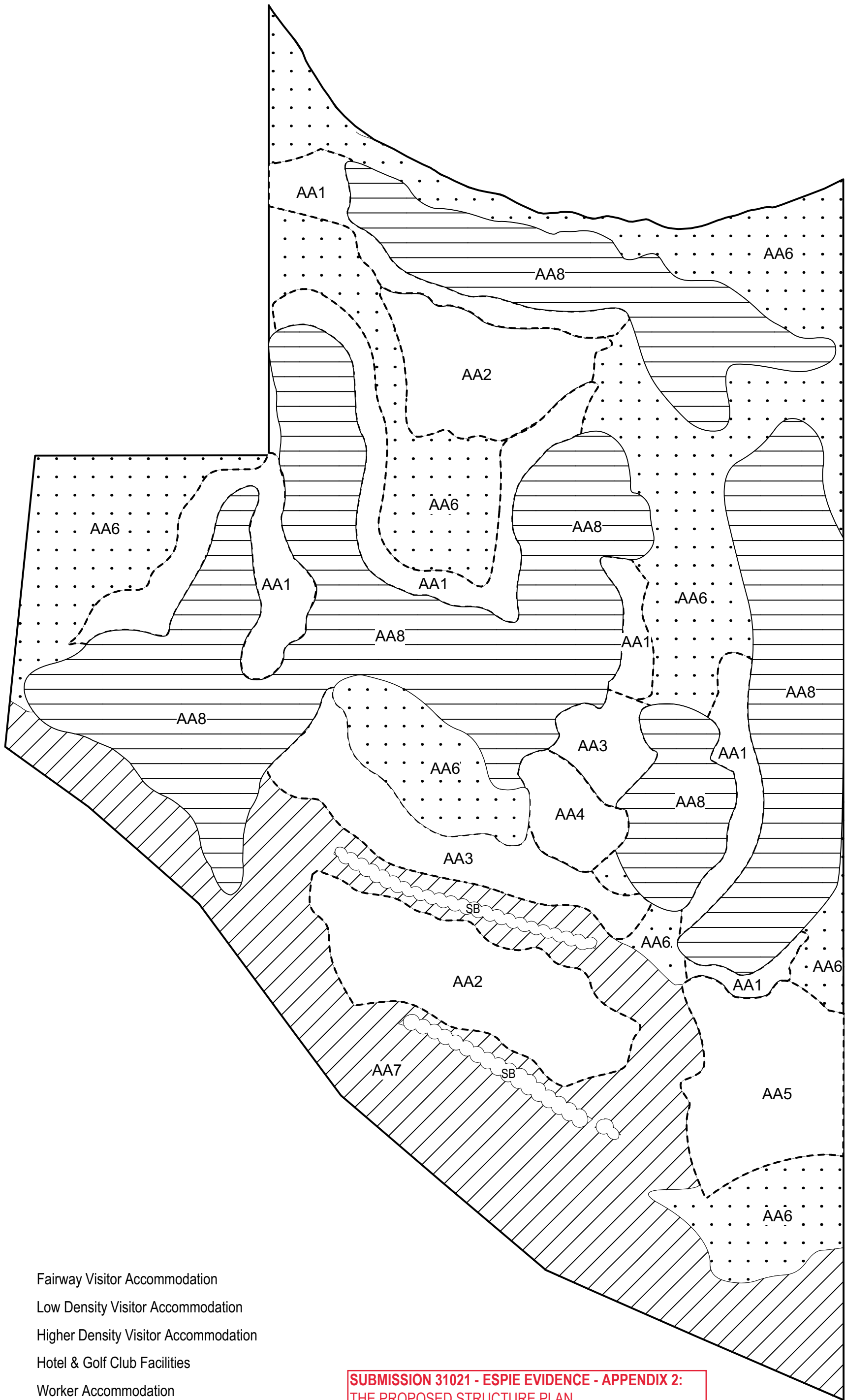
**SUBMISSION 31021 - ESPIE EVIDENCE - APPENDIX 1:
THE PROPOSED STRUCTURE PLAN SHOWN ON TOPOGRAPHY**

CORBRIDGE RURAL VISITOR ZONE

DRAFT STRUCTURE PLAN

27/05/2020

SCALE: 1 : 8000 @ A3



KEY

- AA1 Fairway Visitor Accommodation
- AA2 Low Density Visitor Accommodation
- AA3 Higher Density Visitor Accommodation
- AA4 Hotel & Golf Club Facilities
- AA5 Worker Accommodation
- AA6 Open space
- AA7 Open Space Road Buffer
- AA8 Golf Course
- SB Shelterbelts to be retained

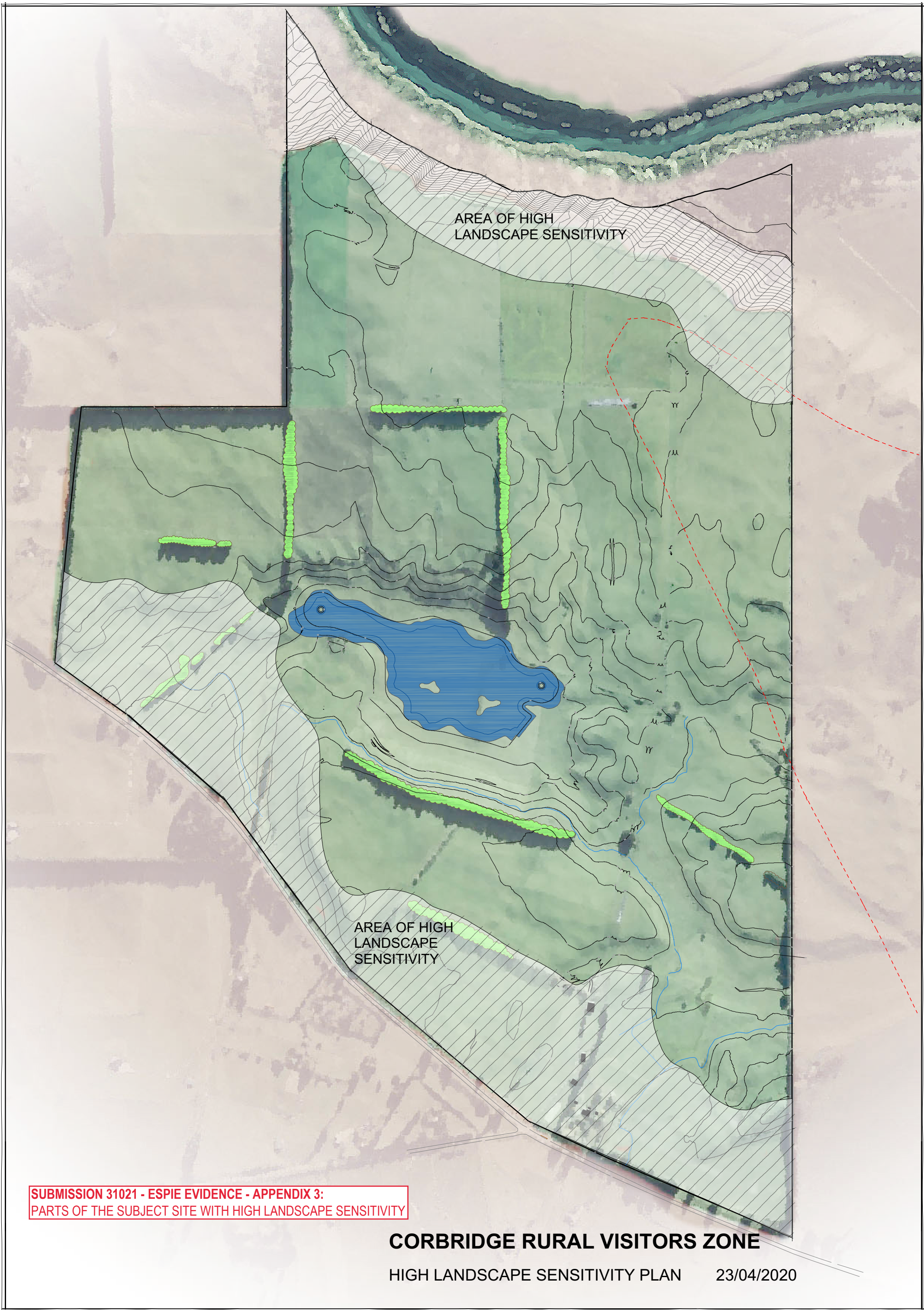
SUBMISSION 31021 - ESPIE EVIDENCE - APPENDIX 2:
THE PROPOSED STRUCTURE PLAN

CORBRIDGE RURAL VISITOR ZONE

DRAFT STRUCTURE PLAN

27/05/2020

SCALE: 1 : 8000 @ A3



AREA OF HIGH LANDSCAPE SENSITIVITY

AREA OF HIGH LANDSCAPE SENSITIVITY

SUBMISSION 31021 - ESPIE EVIDENCE - APPENDIX 3:
PARTS OF THE SUBJECT SITE WITH HIGH LANDSCAPE SENSITIVITY

CORBRIDGE RURAL VISITORS ZONE

HIGH LANDSCAPE SENSITIVITY PLAN 23/04/2020