

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL HEARINGS PANEL

UNDER the Resource Management Act 1991

IN THE MATTER of the review of parts of the Queenstown Lakes District Council's District Plan under the First Schedule of the Act

AND

IN THE MATTER of submissions and further submissions by **REMARKABLES PARK LIMITED AND QUEENSTOWN PARK LIMITED**

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF STEPHEN KENNETH BROWN ON
BEHALF OF REMARKABLES PARK LIMITED AND
QUEENSTOWN PARK LIMITED**

(LANDSCAPE)

STREAM 13 REZONING MAPPING HEARINGS

28 August 2017

**BROOKFIELDS
LAWYERS**

J D Young / M Goudie
Telephone No. 09 379 2155
Fax No. 09 379 3224
P O Box 240
DX CP24134
AUCKLAND

QUALIFICATIONS AND EXPERIENCE

1. My name is Stephen Kenneth Brown. I have practised as a landscape architect for 35 years, and my qualifications and experience are described in my evidence in chief (**EIC**). I also confirm my compliance with the Environment Court's Code of Conduct for Expert Witnesses (2014).

INTRODUCTION

2. This statement addresses matters raised by Helen Mellsop in her rebuttal statement of 7 July 2017 for Queenstown Lakes District Council, which responded to the submissions made by Remarkables Park Ltd (**RPL**) and Queenstown Park Ltd (**QPL**) in relation to the proposed Queenstown Lakes District Plan. In particular, this statement addresses concerns raised by Ms Mellsop about the proposed Remarkables Ski Field gondola project and a mixture of tourism and residential development within parts of Remarkables Station at the foot of the Northern Remarkables Range. The matters that I will therefore traverse, in the order that they appear in Ms Mellsop's statement relating to her concerns, are as follows:
 - (a) The visibility of the proposed gondola;
 - (b) Intrinsic versus perceived landscape values and 'knowing the gondola is there';
 - (c) Ensuring that planting occurs around the development nodes and that their integration with their landscape setting is addressed as a matter of discretion;
 - (d) Suggested revisions to RR2 and RR3;
 - (e) The visibility of the proposed RV3 tourism / residential development node – particularly from Hawthorne Drive (the Airport RESA);
 - (f) The visibility of the other RR and RV nodes from the Crown Range Road and Morven Hill;
 - (g) The modelling of the RV3 village;
 - (h) The 'context' for views to The Remarkables ONL;
 - (i) People's experience of The Remarkables ONL; and
 - (j) Aspects of the proposals not addressed in my EIC.

THE VISIBILITY OF THE PROPOSED GONDOLA

3. At paragraph 4.13 of her statement, Ms Mellsop focuses on perceived shortcomings in the simulations prepared by Build Media Ltd. As is stated in my EIC, I employed the simulations, together with site visits to each viewpoint (and others) before determining the level of effect that the gondola would have. In particular, I spent some considerable time looking at the existing Skyline gondolas in Queenstown and Rotorua. Thus, at paragraph 6.3 of my EIC I describe many of the variables that would influence perception of the proposed structures and carriages. Although Build Media's simulations assisted me in this regard, I also took into account the relative visibility of the existing powerline and access road up to The Remarkables Ski Field in the course of undertaking my assessment. This is because simulations have clear limitations: the A3 width of any imagery inherently affects perceptions of scale, while, its two-dimensional format cannot replicate the 3D perception associated with human appreciation of any view. Most importantly, however, movement and noise cannot be portrayed in static images, and the human eye's ability to roam over landscapes before selectively homing in on points of interest or attention is greatly reduced.

4. Consequently, my use of the simulations prepared by Build Media was selective and considered. As indicated in my EIC, I was aware of issues like colour and reflectivity, and the likelihood that movement – as with vehicles on the ski field access road – would draw attention at times. Even so, I carefully evaluated each view towards the gondola with reference to a range of wider considerations as well (paragraph 6.3 of my EIC):
 - (a) The linearity, surficial textures, shadowing and other variables apparent in the backdrop afforded by The Remarkables and the Kawarau River valley that would assist with the visual absorption, or otherwise, of the gondola system;
 - (b) The presence of other landscape elements – generally in the foreground and middle distance – framing the view to the gondola corridor that would further assist with screening and integration of the gondola (or otherwise);
 - (c) The natural orientation of views from each location, with some – such as those down a highway corridor – much more directional than others; and

- (d) Various climatic / weather conditions and the time of the day and year – with the faces of The Remarkables likely to be much clearer on fine days and more saturated, in terms of their colour, from mid afternoon onwards.
5. I should also add at this juncture, that because of the difficulty of seeing the gondola and its proposed columns, I specifically asked Buildmedia to show the gondola system outlined in red so as to highlight its presence in each viewpoint ‘after’ image. Those images also assisted my assessment of the proposal. Consequently, it is my opinion that the factors identified by Ms Mellsop have already been taken into account in my assessment of the gondola system’s visibility (Table 1 of my EIC) and I do not consider that any of my ratings should be changed.
6. Even so, I understand that Buildmedia has discovered that the cabins modelled for its simulations were smaller than they should have been¹ – more akin to the 6 person cabins originally looked at by RPL than the 8 person cabins now proposed (with dimensions of 2.1mL x 1.88mW x 2.2mH versus the original 1.6mL x 1.6mW x 1.8mH). Consequently, I have reviewed a new set of simulations that show the larger cabins superimposed on the 9 ‘after’ views employed in my EIC. With, for example, both sets of images for Viewpoint 01 (located on the top of the Airport RESA) enlarged by 200% I could see both sets of cabins, but still found it extremely difficult to distinguish one size of cabin from the other. When I enlarged both images by 400% the change in dimensions became more evident, but both sets of cabins – including their shadows – still remained quite difficult to separate from the patina of vegetation behind and around them.
7. Overall, therefore, it is my opinion that this change in cabin size has little, if any, bearing on the visibility and overall effects of the proposed gondola system. Again, while this matter has led me to have another look at Table 1 of my EIC, it remains my opinion that the ratings found in that table are appropriate. They accurately reflect the anticipated visibility of the proposed gondola system.
8. I also note that at paragraph 4.16 Ms Mellsop questions my reference to the gondola ‘floating’ above the landscape of the Kawarau River valley and the northern side of The Remarkables. However, it is important to contextualise this statement:

¹ Addressed in Mr Johnsons supplementary statement of evidence dated 28 August 2017.

many forms of development physically alter the terrain and land cover eg. forestry, quarrying and urban development. However, other types of development – such as gondolas, transmission lines and even wind farms – tread much more lightly on the physical landscape. They traverse it and even hover over it, without having the same degree of impact on the terrain, water bodies, vegetation cover, patterns, textures and materiality that are so critical to its essential character and values.

9. In this instance, one only has to look at the power line already climbing up to The Remarkables Ski Field in very close proximity to part of the proposed gondola route, and compare that with the access road up to the same ski field, to appreciate the way in which I used the term ‘floating’. Consequently, I regard the proposed gondola as being far more likely to leave the landscape of the Northern Remarkables relatively intact than most other forms of development and use. This is not to say that the proposal would be devoid of all effects; yet, its impact would clearly be reduced by the manner in which most of the proposed system is suspended above the landscapes of the Kawarau River valley and Northern Remarkables.

INTRINSIC VERSUS PERCEIVED LANDSCAPE VALUES AND “KNOWING THE GONDOLA IS THERE

10. The issue of effects on ‘intrinsic’ landscape values is raised by Ms Mellsop at her paragraph 4.19, where she states that: *“In my view, Mr Brown is discussing perceived rather than intrinsic naturalness in his paragraph 6.21 and the level of effect on amenity values rather than on landscape values.”* Indeed, my paragraph 6.21 provides a summary of factors that would affect the perception of the gondola, subsequent to a section of my EIC that addresses existing landscape values and preceding two sections that highlights my ‘key findings’: one in relation to the gondola alone, the second in relation to both the gondola and tourism based development also proposed by QPL. Ms Mellsop’s implied criticism appears to be that visibility is the only consideration that has been addressed in my statement.
11. In reality, my assessment also takes into account both the operative and proposed district plans’ interpretation of key local landscapes, including ONLs and ONFs, and my own interpretation of both The Remarkables ONL and the Kawarau River valley landscape at paragraphs 5.6 to 5.20 of my EIC. Furthermore, it is important to note

that the NZ Institute of Landscape Architects Charter (2010), at p.4, describes “Landscape” as being: “*the cumulative expression of natural and cultural elements, pattern and processes in a geographical area.*” Moreover, the Charter’s Preamble offers the following, slightly more fulsome, description of landscapes – as follows:

Landscapes are the result of unique combinations of biophysical, cultural and social processes, evolving over time and interwoven with memory, perception and tradition. They include land, water systems and marine areas, and play a vital role in human nurture, fulfilment and in shaping individual and collective identity. Landscapes range from the outstanding and the memorable, to the familiar and commonplace

12. I agree with these descriptions. Landscapes are, of course, a perceptual construct that combines visual awareness of physical elements and patterns, with perception and appreciation of both spatial and aesthetic characteristics, and cultural dimensions and values, to create a sense of place or identity. The concept of intrinsic values remains important for landscapes that are imbued with a sense of remoteness or naturalness, and is perhaps even more significant in relation to ‘natural character’, where the overlays of human appreciation – including concepts of order, composition and aesthetic coherence – are less important than naturalness *per se*. In this context, the iconic ‘Western face’ of The Remarkables is especially significant because human perceptual values that have been applied to them: they are considered beautiful and majestic as a human response to their dramatic physical composition. Indeed, the very concept of ONLs and ONFs is fundamentally a product of human reactions to, and appreciation / evaluation of, different landscapes.

13. In fact, the intrinsic naturalness associated with both the Kawarau River valley and Northern Remarkables has already been eroded by a range of human activities and developments, including (but not limited to):
 - (a) The Remarkables Ski Field and related structures;
 - (b) Its access road;
 - (c) Its power line (up the side of the range);
 - (d) Farming across the Kawarau River’s alluvial terraces and grazing across the Northern Remarkables’ lower to middle slopes;
 - (e) Existing farm buildings and tracks near the Kawarau River, Rastus Burn and Owens Creek;

- (f) Residential development on the northern margins of the Kowarau River focused on Lake Hayes Estate and Shotover Country;
- (g) The pasture and pine woodlots that also hug both sides of the Kowarau River;
- (h) Pine shelterbelts both sides of the river;
- (i) The riverside trail network following that same river;
- (j) The gorse (plenty of it which is spreading rapidly), wilding pines, willows, poplars, broom and other exotic plants / weeds that infest the lower reaches of the river valley and its terraces; and
- (k) The transmission lines, which also follow the northern side of the Kowarau River.

14. In light of these considerations, I consider it entirely appropriate to focus strongly on how, and to what degree, the proposed gondola would affect community appreciation of both the northern Remarkables and the Kowarau River valley. In my opinion, this is a more important consideration than intrinsic values that are already compromised across the northern margins of The Remarkables.

15. Indeed, the issue of 'knowing that the gondola is there', which is highlighted by Ms Mellsop at her paragraph 4.21, expands upon her comments about intrinsic values, albeit in a somewhat different vein. She stresses that even if people can't see the gondola, they will still be aware of its presence. Yet, whether such awareness and knowledge would be a positive or negative attribute remains unclear. The proposed gondola would inevitably erode some of the inherent naturalness and remoteness of the Northern Remarkables, as I acknowledge in my EIC; but it would also offer a new and different perspective of the landscapes that it passes through – one that many locals and tourists appear likely to appreciate. In my view, these public benefits have to be balanced against Ms Mellsop's 'knowing its there' effects, although I am uncertain just how one could either measure such effects or weigh them up against one another.

16. Ms Mellsop also refers to the analysis of other route options for the gondola project, in the context of this same issue, but it is my understanding that the greater visibility and legibility of those schemes would have had a significant effect on the iconic western profile and aesthetic character of The Remarkables. Such effects would

have gone well beyond the rather subtle, 'knowing its there' level, to having a direct impact on the profile and aesthetic character of the mountain range. My own assessment has set out to ascertain if the more northern gondola route, currently proposed, would also generate such effects and I have determined that it would not.

ENSURING THAT PLANTING OCCURS AROUND THE DEVELOPMENT NODES & THE INTEGRATION OF ALL DEVELOPMENT IS ADDRESSED AS A MATTER OF DISCRETION

17. At paragraph 4.22 of her statement, Ms Mellsop also raises questions about implementation of the planting and revegetation discussed within Section 8 of my EIC. Such matters are addressed in relation to the RV3 and RR3 via the following proposed revised provisions:

44.4.9 Rural Visitor Activity Areas

44.4.9.1 Buildings

The addition, external alteration or construction of buildings. Control is reserved to the following:

- The bulk, location and external appearance of buildings, including building colour and reflectivity.
- Creation of active frontages adjacent to streets and public spaces;
- External lighting;
- Integration with surrounding buildings;
- Infrastructure and servicing;
- Earthworks and vegetation clearance;
- Location and design of car parking;
- The adequate provision of storage and loading/ servicing areas; and
- Landscape design.

44.4.9.2 Any commercial, community, residential or visitor accommodation activity (excluding buildings) within the Rural Visitor Activity Areas.

Provided that the application is accompanied by an application for comprehensive development or is in accordance with a resource consent having been granted under Rule 44.4.8.

Discretion is restricted to the matters listed in Rule 44.4.8.

Further, provided that the application is accompanied by a Trail Plan or is in accordance with an approved Trail Plan, which applies to the formation of a cycle/walking trail from Boyd Road to the proposed pedestrian bridge at Rural Visitor Activity Area 3 and is sufficiently detailed to enable the matters of discretion listed below to be fully considered.

Discretion is restricted to the following:

- Whether public access on the proposed public trail is secured in perpetuity via an appropriate legal mechanism;
- The degree to which the applicant provides for the construction of the trail to the standard of comparable trails;
- The timing for the formation of the trail which shall ensure it is completed no later than 12 months after the gondola is operational or 6 new rural residential dwellings are completed (not including housing for staff); and
- Objectives 44.2.2 and related policies.

44.4.10.1A Buildings

Control is reserved to the following:

- Locations;
- Materials, colour and reflectivity;
- Landscaping
- Response of development pattern to landscape values both within the Activity Area and in the surrounding context;
- Planting and other landscape treatment that responds to the landscape values and rural character of the area; and
- Maintenance of rural character.

44.4.10.1B Buildings in Rural Residential Activity Areas 2, 4, 5, and 6 where development precedes subdivision

Discretion is restricted to the matters listed in Rule 27.5.7.

44.4.12 Gondola Passenger Lift Systems within the Gondola Corridor

Control is reserved to the following:

- Whether the colours to be used are compatible with the rural landscape of which the Passenger Lift System will form a part;
- Balancing environmental considerations with operational requirements;
- Lighting;
- The ecological values of the land affected by structures and activities and any proposed ecological mitigation works; and
- Effects on existing recreation and tourism activities on and beside the Kawarau River;

44.4.13 Gondola Base Station or Terminal Buildings

Construction, relocation, addition to or alteration of a base or terminal building at the following locations:

- **Commuter Station**
- **QP Bend Station**
- **QP Village Stations**
- **QP Upper Station**

Control is reserved to the following:

- Location, external appearance and size, colour, visual dominance;
- Associated earthworks, access and landscaping;
- Provision of water supply, sewage treatment and disposal electricity and communication services (where necessary);
- Lighting; and
- Location and design of any associated car parking

18. In my opinion, proposed Rule 44.4.9.2 is particularly relevant to the concerns that I raised in my EIC.

19. However, I also agree with Ms Mellsop that the landscape effects of development within the RR2 and RR4 to RR6 nodes also need to be addressed in the assessment of proposals for them. Accordingly, I support Mr Serjeant's proposed amendments to Rule 27.5.7, which include the following:

Additional criteria for subdivision within the QPSZ Rural Residential and Rural Visitor Activity Areas:

- Response of development pattern to landscape values both within the Activity Area and in the surrounding context;
- Planting and other landscape treatment that responds to the landscape values and rural character of the area; and
- Maintenance of rural character.

20. I also agree with Mr Serjeant's proposed changes to Rule 44.4.8, which have a stronger focus on landscape matters and ecological enhancement, including the 'integration of RV3 with its wider landscape setting' the 'reinforcement of natural patterns' and the 'use of native vegetation'. In my opinion, these changes respond appropriately to the concerns raised by Ms Mellsop.

SUGGESTED REVISIONS TO RR2 AND RR3

21. I acknowledge that my suggestions in relation to some 'fine tuning' of the boundaries of RR2 and RV3 have not been fully incorporated in the current submissions by QPL. It is, of course, my client's prerogative to weigh up all of the inputs to their project and make decisions that don't always accord with every expert's individual recommendations. I accept that is the case in relation to these two proposed nodes. On the other hand, I have made other recommendations to QPL – including in relation to other potential areas of development – that have been 'taken on board' by my client, eg. the removal of an "RR7" area close to Chard Farm.

THE VISIBILITY OF THE PROPOSED RV 3 TOURISM / RESIDENTIAL DEVELOPMENT NODE – PARTICULARLY FROM HAWTHORNE DRIVE (THE AIRPORT RESA)

22. Ms Mellsop's paragraph 4.24 highlights areas that I apparently missed in my assessment of the various visual catchments and receiving environments exposed to the Rural Residential and Rural Visitor Activity Areas. I have, in fact described a wide range of locations that would be subject to some form of visual interaction with the proposed residential and visitor activity areas. However, my focus was primarily on those areas that would experience some degree of appreciable change as a result of the proposed developments.

23. Hawthorne Drive (the Airport RESA) and more elevated residential areas above Frankton Road (west of the junction with SH6A) lie some 4.8km and 7.0km or more, respectively, from the RV3 site. Intervening landforms and vegetation would restrict views to the proposed village and adjacent residential areas even before new planting starts to mature, while the location of such development on two terraces would tend to expose just its edges, rather than the layering of hillside development captured in Ms Mellsop's Photograph 1. New and existing planting around the Kawarau River margins and across the steep escarpment between the two terraces would further obscure these pockets of development and / or visually fragment them. The use of recessive building materials and colours would compound this visual isolation of the RV3 village when viewed over the sort of distances just described – as Build Media's Viewpoint 01 images suggest (see overleaf):



THE VISIBILITY OF THE OTHER RR AND RV NODES FROM THE CROWN RANGE ROAD AND MORVEN HILL

24. In a similar vein, two short stretches of the Crown Range Road offer a broad overview of the Kawarau River valley, close to the western end of the Gibbston Valley, then the broader expanse of the Frankton Flats and the approach to Queenstown. Both views are over viewing distances of approximately 5km or more to the upper terraces of the RR5 and RR6 development node either side of the existing Remarkables Station farmhouse and sheds (see the following Google Earth images).

25. These viewpoints are highly dynamic, with most motorists' attention drawn primarily to the winding, downhill road corridor in front of them. However, the road also offers spectacularly panoramic views over the Kawarau River valley and Frankton Flats area, including a broad, undulating 'checkerboard' of both farmland and rural-residential development that is framed by the rising, alpine 'massif' of the Northern Remarkables. In more static views from a lookout next to the Crown Range Road (accessed via steps over a fenceline) the terraces of RR5 and RR6 are visible beyond the northern edge of the Kawarau River escarpment, together with – more distantly – elevated parts of RR3 and RR2 (see Annexures 1 and 2 attached).
26. All four nodes appear quite remote and development across them would sit low down within the surrounding valley corridor. Intermixed with trees, shelterbelts, and the dissected terrain around both the Owens Creek and Rastus Burn, the proposed residential areas would replace the flat plane of each terrace with a contained 'patchwork' of roofs, walling and open spaces, intermixed with new vegetation. However, the new buildings would not have the same 3-dimensional qualities as, for example, the winery and ancillary of Chard Farm to the left of the Kawarau River in Annexure 1 or other buildings more directly exposed to this vantage point. The development nodes would remain visually subservient to the wider interplay of undulating, to broken, river terraces mountain slopes, pasture, shelterbelts and pockets of development that dominate the general outlook beyond the immediate lookout / road environs.
27. I reviewed the proposed development from both this vantage point and the adjoining road. In relation to both felt that it would remain a quite recessive, relatively insignificant, component of the wider panorama – even moreso as it is only fleetingly revealed to those using the Crown Range Road. In fact, the highly dynamic nature of the outlook from this road – with views constantly changing as vehicles sweep down quite steep gradients and around sharp bends – was a key reason for me deciding not to explore views from this location in more detail. It was my assessment that development within the proposed residential nodes would have a marginally greater impact on views from the lookout next to the Crown Range Road; but even then I considered that the pockets of residential development proposed would be largely lost amid the broad matrix of fractured terrain, pasture and vegetation that frames both the lower Owens Creek and a more remote Rastus

Burn. In my opinion, the proposed residential nodes would have little impact on the grandly scaled landscape that encloses them.

28. As a result, my assessment focused on those areas that would be more directly affected by the proposed development nodes: the Ladies Mile Highway, Lake Hayes Estate, the walking / cycling trail through to Arrowtown and the Gibbston Valley, and the Kawarau River itself. Having reviewed the Crown Range Road views to and over the Kawarau River valley, in light of Ms Mellsop's comments, it remains my opinion that exposure to the RR5 / RR6 node would have little, if any, impact on the character of river valley and alpine landscapes visible from the Crown Range Road.
29. Ms Mellsop also indicates that the RV3 and RR3 development nodes would be visible from the top of the Crown Range Road 'zig zag' – captured in Build Media's Viewpoint 10 images (see overleaf).



30. Both areas would, in fact, be visible just to the left of Morven Hill, above the line of pines at the edge of the Kawarau River Valley. Yet, this view sweeps from The Remarkables to Coronet Peak, and – as with Viewpoint 01 – it would be all but impossible, in my opinion, to distinguish the proposed development from its wider landscape setting. Again, any such changes would be 'dwarfed' by the scale of the surrounding, panoramic landscape exposed to this vantage point, and with a viewing distance of nearly 5.6km to the edge of the RR2 area, it would be extremely

difficult to clearly discern new residential buildings on the upper terrace (development on the lower terrace would be screened by the lip of the valley) because of an array of intervening landforms and vegetation, and the rather mottled backdrop afforded by The Remarkables lower slopes. In my opinion, the proposed development would either have no impact on this vantage point or a very low level of effect.

31. Consequently, I do not agree with Ms Mellsop when she states at her paragraph that “*the other activity areas*” (not RV3) would be “*clearly visible as nodes of intensive rural living from the lookouts on Crown Range Road*”. I have already described the degree of visual exposure in relation to one part of the Crown Range Road and an adjoining lookout at my paragraph 25 above, while the top of the ‘zig-zag’ would offer glimpses of RV3 and RR2. However, the lookout on the very crest of the Crown Range, and much of the road corridor leading up to it, offers no such views. Furthermore, in looking beyond solely whether or not the various nodes would be visible at all, I concluded that their effects would not be as significant as those discussed in my EIC.
32. Although my EIC is also criticised for failing to address “*council reserves directly across the river*” (Paragraph 4.24) and from SH6 at Ladies Mile, this is clearly incorrect, as much of my EIC – including photos – addresses vantage points on and near the walkway / cycle trail down the Kawarau River, the river margins near Lake Hayes Estate and the margins of SH6 above Lake Hayes estate near McDowell Drive.

MODELLING OF THE RV3 VILLAGE

33. Ms Mellsop queries the scale of the buildings modelled in the RV3 village photomontages at her paragraph 4.28 stating that I “*have not provided any information about the parameters used to produce the model, in terms of building coverage, building heights, road access and age and type of vegetation shown.*” Ms Mellsop is correct: the village was developed as an architectural study by Mason and Wales, in compliance with the provisions developed by Mr Serjeant, but not as a developed or proposed concept. I also produced a very conceptual ‘planting plan for RV3 aligned with the building and roading layout. As indicated at paragraph 8.21 of my EIC, the resulting combined concept was employed to conceptualise what

might happen ‘on the ground’ and give it some meaning in the course of my analysis from a range of vantage points. In relation to the concerns raised by Ms Mellsop, my instructions to Gabrielle Howdle (a landscape architect in my office) were therefore to model the village:

- (a) As indicatively configured – in terms of building footprints and distribution – by Mason and Wales Architects;
- (b) With planting as per my indicative planting concept: concentrated to a greater degree on the river bank and escarpment between both terraces, but with a range of amenity planting within the village and around its margins;
- (c) With a three storey, central village street on the lower RV3 terrace (9-10m);
- (d) With all other development within the RV3 area limited to two storeys (8m maximum);
- (e) Utilising the existing farm track, plus an extension up onto the upper terrace; and
- (f) With trees shown between 7m and 10m high, while hedgerows and underplanting were to be 2-4m high, depending on their location.

THE CONTEXT FOR VIEWS TO THE REMARKABLES ONL

- 34. At paragraph 4.28 Ms Mellsop also criticises my EIC for having regard to the way in which some – not all – views from Lake Hayes Estate are contextualised by the existing development within that residential estate. Ms Mellsop then goes on to state that my approach *“could be extrapolated to mean that intense rural living or visitor accommodation development on ONLs visible from urban Queenstown would be acceptable because it is viewed within an urban environment. The context of the viewer could be relevant in assessing effects on perceptual landscape attributes such as the sense of remoteness or wildness, but not in assessing the visual effects of development in prominent ONLs.”*
- 35. In response to this statement, I can only repeat my previous comments about the perceptual component of landscape. The NZILA’s Charter makes it clear that human perception is fundamentally intertwined with the natural, geophysical components of landscape. Furthermore, the NZ Coastal Policy Statement

comments in Policy 13(2)(h) that any evaluation of natural character – which has even more of a geophysical focus than ‘landscape’ – should address “*experiential attributes including their context or setting*”. Indeed, the issue of context is fundamental to the delineation of all ONLs, including the interpretation of their landscape characteristics and values. It is equally fundamental to evaluating effects associated with development proposals, on such landscapes. Consequently, the fact that The Remarkables are an ONL hardly obviates the need to have regard to the context for human interaction and engagement with them.

36. The issue Ms Mellsop has actually raised is that of taking into account other factors which also influence the level of overall effect, including the visual prominence and legibility of the development proposal, scale relationships, screening, mitigation, etc. The context offered by the existing environment remains a critically important component of any landscape assessment (either strategic or development / effects based), but it is certainly not the only factor that needs to be taken into account when addressing either value or effects. In this instance, Ms Mellsop’s ‘extrapolation’ is misconstrued as it only pertains to some vantage points – not all – and it is one of several factors that have been identified and weighed up in my assessment.
37. To provide some context in this regard, I was also initially asked to address development nodes near the lower ski field access road, below the face of the western Remarkables. I tested those proposals via a range of vantage points around SH6, Jacks Point, the Frankton Arm, Queenstown Airport and newly developed parts of Remarkables Park. Many of those viewpoints were framed and ‘contextualised’ by existing urban and residential development; even so, I still determined that the lower western slopes of The Remarkables – extending down across its moraine apron – were too sensitive for me to support development in that area. As a result, the current submissions do not address the original RV1 and RV2 nodes.
38. A somewhat different combination of factors also gave rise to my concerns about the originally proposed RR7 development node, west of Chard Farm, including the relatively raw and elemental, physical context which frames views to that site from SH6.

39. These examples reflect the reality that thorough landscape assessment requires multiple variables to be addressed; not just ‘context’ in a rather isolated and singular fashion. Consequently, my EIC findings reflect the greater ability of the northern Remarkables ‘apron’ and Kawarau River valley to accommodate both a gondola and the proposed development nodes – subject to evaluation against a range of applicable variables and criteria.

PEOPLE’S EXPERIENCE OF THE REMARKABLES ONL

40. Ms Mellsop then goes on to agree with me at her paragraph 4.30 that the *“increased public access to the ONL would be a positive effect of the proposal”*. Yet, she then has a slight ‘dig’ at the way in which the gondola and other QPSZ development would colour people’s perception of The Remarkables ONL. My only comment in this regard is that this is also true of the existing ski field access road, which provides access to a man-made destination and leaves its own imprint on the ONL.
41. In addition, the gondola would provide a quite different way of seeing / experiencing both the Kawarau River valley and the sub-alpine to alpine landscape of the Northern Remarkables. Consequently, much as the gondola would erode some of the inherent naturalness of the ONL, it would do so in an incremental fashion and it would also enhance public appreciation of the Range’s landscape values.

ASPECTS OF THE PROPOSAL NOT ADDRESSED IN MY EIC

42. Finally, at paragraph 4.31 of her statement, Ms Mellsop has listed a number of elements that *“have not been fully addressed by Ms Skidmore or Mr Brown”*, including road widening, traffic movements, parking areas, glamping sites, jetties and bridges, bike trails, lighting, etc. I have not addressed these matters specifically because many of the effects associated with road widening, traffic, glamping etc, would be largely internalised within Queenstown Park Station and/or within the area of development that is addressed in my assessment.
43. In particular, the main access route connecting the proposed nodes would largely follow existing farm tracks, and even though increased vehicle use of that network would signal the presence of a ‘road’, relatively few locations – perhaps the north-

side bike / pedestrian trails most of all – would reveal the extent of widening associated with that change and the transition from a gravel surface to asphalt. Across the individual river terraces employed for each development node, planting and buildings would have more visual presence than the internal circulation system and car parking because of the shallow gradients and cross-fall found on the terraces next to both the Rastus Burn and Owens Creek. However, the very nature of these proposed areas and their effects – as a whole – would remain subject to more detailed scrutiny under the proposed QPSZ provisions.

Bridges, Jetties & Wharves:

44. This is also the case in relation to other structures that I have not specifically addressed – such as the proposed wharves, jetties and bridges – that would also require separate resource consents – which can then address the effects associated with each proposal in a very specific and detailed manner. I need to add, however, that the Kawarau River is, for the most part, closely framed and enclosed by both river terraces and the willows and other vegetation that follow its margins. In particular, the stretch of river near RV4 is largely isolated from points of public contact and access, apart from the actual river fairway – used for jet boat tours – and the cycleway / walkway down its northern side.
45. In my opinion, the bridges and jetties and /wharves would remain quite visually discreet, except when viewed from very close to the river fairway. Even Lake Hayes Estate affords little more than glimpses of the river course because of the willows, poplars and pines that enclose its passage. Furthermore, the proposed bridges, jetties and wharves would remain largely ancillary to the development within each of the adjoining ORV3 and RV4 nodes. As such, they would have a quite limited impact in their own right, while the bridges, especially, would enhance contact with, and exposure to, the Kawarau River.

Glamping:

46. Although I inspected the upper reaches of the station by helicopter, both flying over the terrain and landing at various points, I have not addressed the glamping proposals because no fixed sites have yet been identified, although I understand that alternative, potential sites have. In my opinion, the glamping sites and tents should, in theory, be subservient to their sub-alpine setting, sitting comfortably within the broad landscape canvas afforded by the lower Remarkables range and

Kawarau River valley. However, I also accept that this is dependant on final decisions being made about the location of each glamping site, the size of individual 'tents', the scale each group of tents, and the provision made for access to them.

Lighting:

47. Lastly, in relation to lighting of the gondolas and activity areas, I recognise that the nightscape of the Kawarau valley and Northern Remarkables could change, although vehicles already use the ski field access road and the field's hours of operation would determine the extent to which such lighting is an issue. In a comparative sense, car headlights also appear likely to remain far more intrusive than the subdued lighting associated with the proposed gondola cabins.

48. In relation to the proposed activity areas, it is clear that both Lake Hayes Estate and, to a lesser extent, Shotover Country have already changed the night-time character of much of the Kawarau River valley. Lighting within the proposed nodes, together with that generated on the intervening link road, would compound this transition, although it would be tempered by the existing lights found amid the farms and rural-residential blocks stretching through to Chard Farm, and headlights following the course of SH6 down Ladies Mile and past Morven Hill. Overall, it is my assessment that such effects would be of a low to, at most, moderate order.



Stephen Brown
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