BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of a hearing on submissions to Stage 2 of the Proposed Queenstown Lakes District Plan pursuant to clause 8B of the First Schedule of the Resource Management Act

ON BEHALF OF X-RAY TRUST AND AVENUE TRUST Submitter

EVIDENCE OF PHILIP BLAKELY (LANDSCAPE ARCHITECT) DATED 13 JUNE 2018



1. INTRODUCTION

- 1.1. My name is Philip Blakely. I have resided and worked in the Wakatipu Basin for over 30 years. I am a partner and director of Blakely Wallace Associates. The consultancy was established in 1997 and undertakes a diverse range of landscape architecture including landscape design, management, assessment and planning for private clients, Government, and local authorities. I hold the qualification of Bachelor of Applied Science (Landscape Architecture) with Distinction from the Royal Melbourne Institute of Technology. I am a Registered Member of the New Zealand Institute of Landscape Architects (NZILA).
- 1.2. I have had thirty years' experience, primarily in the lower South Island, as a practising landscape architect in both public and private practice. I have broad experience in the assessment of landscapes and landscape character and the impacts of development on the landscape and in the integration of development into sensitive environments. From 1985-1997 I was senior landscape architect for the Department of Conservation based in Queenstown and worked on a range of site planning, design, management and landscape assessment across the activities and responsibilities of the Department. I was a committee member of the Wakatipu Environmental Society Inc. (W.E.S.I.) for at least 15years up to the time the Society was dissolved and advised the Society on landscape and amenity issues.
- 1.3. I have been a past member of the Queenstown Urban Design Panel and I am a long standing member of the Arrowtown Planning Advisory Group (APAG). I have prepared and presented evidence for many Council and Environment Court hearings.
- 1.4. Although this is a Council hearing, I confirm I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note 2014 and that I agree to comply with it. My qualifications

BLAKELY WALLACE LANDSCAPE ARCHITECTURE & PLANNING as an expert are set out above. I confirm that the issues addressed in this evidence are within my area of expertise.

I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

2. SCOPE OF EVIDENCE

- 2.1. The purpose of this evidence is to assist the Hearings Panel on matters within my expertise in relation to the submission by X-Ray Trust and Avenue Trust. I have been asked to provide evidence in relation to zoning sought by the Trust(s) submission which relates to three lots on the north side of Speargrass Flat Road (i.e. 413-433 and 471 Speargrass Flat Road. The Trust(s) submission requests that:
 - (a) the elevated land ('the Plateau') is rezoned from Precinct to Amenity
 Zone to safeguard the landscape characteristics of that area (i.e the
 LCU 6 Wharehuanui Hills portion of the site);
 - (b) The flat land adjacent Speargrass Flat Road (i.e. LCU 8 Speargrass Flat) is rezoned from Amenity Zone to Precinct.
 - (c) The Landscape Feature line is adjusted to align with the edge of the Plateau.

3. EXECUTIVE SUMMARY

3.1 The Plateau Area of LCU 6 that includes the X-Ray Trust, Avenue Trust property and the Donaldson Block has significant and important landscape characteristics that need to be safeguarded.

- 3.2 Precinct Zoning over the Plateau Area will result in significant landscape and visual effects and will not safeguard identified landscape characteristics.
- 3.3 Early settlement patterns on the valley floor provides an important cue for where and how to place new development.
- 3.4 Carefully located and comprehensively designed cluster style development on the Flat Area within contained nodes of development and large Building Restricted Areas, while retaining rural views will result is a better landscape outcome than Precinct Zoning of the elevated Plateau Area.

4. LANDSCAPE CHARACTER UNITS (LCU)

4.1 The area to which the Trust (s) submission relates straddles two LCU in the Wakatipu Basin Landuse Planning Study (WB Study). These include the Wharehuanui Hills (LCU 6) and the Speargrass Flat (LCU 8). I generally agree with the location, and descriptive information of these two units contained in the Worksheets appended to the WB Study. However I consider there are some additional comments on character in relation to both units and there are some points where I disagree. There are also aspects of the evaluation and recommendations of the WB Study, in relation to LU6 that I disagree with. These are discussed below.

4.2. Wharehuanui Hills (LCU 6)

4.2.1 The Wharehuanui Hills unit is large and stretches from Dalefield Road in the west to Millbrook in the east. While the western extent of the unit is Dalefield Road, in fact it is part of a larger, continuous east west trending ridge of rock that extends from Arthurs Point to Millbrook separating Malaghans Valley and Speargrass Flat.

4.2.2 The rocky ridge has been referred in Environment Court Decisions as

'a ridge of rock shaped like a spiny-backed lizard which has its long smooth tail ending at Millbrook just before Arrowtown'.^{1,2}

- 4.2.3 The eastern end of LCU 6 (including the Trust (s) property and the Donaldson Block is elevated, hummocky and undulating topography with large lots, and is generally open with few trees. Hummocky terrain is characteristic of most of the unit particularly the central part. However further west is characterised by more extensive exotic plantings associated with rural residential development and generally smaller lots and overall a greater level of rural residential development including buildings, trees, roads and signs of domestication. Mooney Valley is contained within the ridge system and is lower and discreetly hidden within the middle section of Wharehuanui Hills. The 'cloak of human activity' is greater at the mid and western end of the unit. The portion of LUC 6 that includes the Trusts property and the Donaldson Block is significantly more open, with larger blocks, fewer trees, and is in general visually exposed especially to high points and viewing points close to Arrowtown (refer para.5.3). Pasture is the predominant vegetation at the eastern end of the unit with a few mature exotic trees and recent immature plantings.
- 4.2.4 There is a greater degree of naturalness at the eastern end of the unit as a consequence of less development. The eastern end retains a wild, windswept character which all of the unit originally had at one time but has been eroded by the degree of domestication and rural residential

¹ Environment Court Decision No. C88./2002 QLDC v Highground Land Company Limited page 4

² Environment Court Decision C3 /2002 WESI Incl.v QLDC, B Paterson and Little Stream Ltd p9

development. There is also very little enclosure at the eastern end and the landform has a high degree of legibility which contributes to a higher degree of naturalness.

4.3 Ice Shaped Hills

- 4.3.1 In addition to the higher and more prominent roche moutonnees of Ferry, Queenstown, Slope, and Peninsula Hill, (which are ONLs or ONFs) there are the other extensive ice shaped moraine hills within the Basin. These include the lower ridges and higher ground that separate the valley floor areas including the Wharehuanui Hills between Malaghans Valley and Speargrass Flat Road and the hills and higher ground south of Speargrass Flat Road (included within LCU 11 Slope Hill Foothills) as well as many other areas of high ground throughout the Basin where hard rock has been overridden by ice. These ice shaped elevated hills are a significant part of the character of the WB and contrast with and provide context to the alluvial and glacial outwash valley floor. In my opinion development should be limited on these areas to avoid adverse landscape effects on the ice shaped hills as has occurred at North Ridge and other areas.
- 4.3.2 I consider there has been inadequate (and inconsistent) recognition and protection of the ice shaped hills as a landscape resource (excepting those classified as ONLs or ONFs) in the WB Study and in the Variation. For example LCU11 (Slope Hill foothills) which includes the ridge on the south side of Speargrass Flat has been given a Low absorption capability but LCU 6 (Wharehuanui Hills which is similar landform has been rated as having a High capability to absorb development.

4.4 Speargrass Flat (LCU 8)

4.4.1 I am generally in agreement with the location, character description, and evaluation of LCU 8 included in the WB Study but consider there are

BLAKELY WALLACE LANDSCAPE ARCHITECTURE & PLANNING some additional comments that can be made. I agree that "the absence of a robust edge to the Lake Hayes Rural Residential LCU makes Speargrass Flat vulnerable of development creep.³

4.4.2 The ribbon of rural residential development on the south side at the western end of Speargrass Flat road is an example of development creep that has occurred over time. I agree that the views across the open rural flats to the hillslopes and escarpment faces are important to rural character, and allow for appreciation of the hill faces. I also agree the open rural flats on the north side of Speargrass Flats provide visual relief to rural residential development. However the development creep has happened incrementally and there is merit in a landscape solution whereby some development can occur on the flats on north side of the road and thereby balance and consolidate the Lake Hayes rural residential development, and reduce the one sided, linear development on the south side of Speargrass Flat without compromising the visual relief provided by the flats or the appreciation of the hill faces. Such development could enable the creation of a defensible edge to the west end of the Lake Hayes Rural Residential Zone

5. EFFECTS OF PRECINCT ZONING ON PLATEAU AREA OF EASTERN END OF WHAREHUANUI HILLS (LCU 6)

- 5.1 In my opinion there are a several landscape and visual effects resulting from proposed Precinct zoning of the area covered by the Trust(s) submissions (Plateau Area) within LCU 6 Wharehuanui Hills. These effects are discussed below.
 - a) Effects on the legibility of the elevated plateau area.
 - *b*) Effect on the relatively visible and visually prominent eastern end of LCU 6.

³ Worksheet LUC 8 WB Study

- c) Effects from loss of visual relief provided by the eastern portion of Wharehuanui Hills as a foil to existing development in particular Millbrook Resort.
- *d*) Effects of subdivision, access and roading on both the hillside areas and plateau of Wharehuanui Hills.

5.2 Effect on Legibility

- 5.2.1 Legibility is defined as 'its expressiveness (legibility): how obviously the landscape demonstrates the formative processes leading to it;'4
- 5.2.2 The Wharehuanui Hills and especially the eastern portion comprising the X-Ray Trust and Avenue Trusts land has a high degree of legibility. The high ridge (Plateau area) is very expressive of formative processes. The ice shaped overridden hard schist rock ridge and hummocky, undulating topography and remnant kettle lakes left by the retreating glacier are clearly expressed in the landscape. The thin soils reflect the glacial outwash and subsequent wind-blown loess material. The complex heavily dissected edge of the plateau (and hillslopes) are expressive of glacial and fluvial processes.
- 5.2.3 Including these areas within the Lifestyle Precinct with the outcome being more buildings, roads and planting would mask and erode the legibility of the landscape. An example of this is at Dalefield where rural residential development and domestication has completely obliterated the legibility of the original landform.

5.3 Visibility of eastern end of LCU 6

5.3.1 The eastern end of the Wharehuanui Hills is relatively visually prominent from a number of locations at the eastern end of the basin including from some public roads and popular viewing points on the trail system above

⁴ Amended Pigeon Bay Landscape Assessment Criteria

and surrounding Arrowtown (refer photos in the Appendices). While these are relatively distant views the ice-shaped ridge landforms are easily read from these locations. (including LCU 6) The locations include:

- The section of Malaghans Road between Arrowtown and just beyond the Millbrook entrance.
- The elevated (hill section) of Hogan Gully Road.
- Feehlys Hill
- Upper Tobins Track and escarpment viewing area as well as other Arrowtown tracks within ONL.
- 5.3.2 From these areas the 'tail of the spiny backed Lizard' can be clearly read and interpreted as can the other relatively undeveloped ice shaped ridges and hills (such as the ice-shaped ridge south of Speargrass Flat that extends to Hunter Road and included within LCU 11). These ice shaped hills stand out and are easily read in contrast with the more developed valley floor.
- 5.3.3 The WB Study Worksheet assessment for LCU 6 for Visibility/prominence states that 'the elevated and hummocky character of the central portion of the unit is not particularly prominent in terms of the wider basin landscape'. This maybe true for some parts of the unit but not for the eastern portion which is relatively visually exposed and prominent. I also disagree with the comment referring to 'the relative unimportance (visually) of the unit within the wider panorama reduces the unit's prominence'. For the reasons outlined above I consider the undeveloped character of this portion of the unit is important and significant.
- 5.3.4 Under 'Potential landscape opportunities and benefits associated with additional development' included in the Worksheet for LCU 6 and in the Key Landscape Character Findings in the WB Study it refers to the 'Relatively visually discreet nature of the majority of the unit'. This maybe true for parts such as Mooney Valley but not for the eastern end.

5.3.5 The final comment included in the evaluation is that the 'Capability to absorb additional development is rated as High'. In my opinion this is incorrect for some parts of the unit including the eastern portion.

5.4 Visual Relief to existing and proposed development

5.4.1 Importantly the Plateau Area provides a foil and visual relief to surrounding development especially for views from the eastern end of the Basin. This is especially the case with the development of Millbrook West which has extended part way up the slope from the Malaghans Valley side. I understand the owners of X-Ray and Avenue Trust(s) and Millbrook Resort negotiated a no build 50m buffer within the boundary of Millbrook West . However this buffer on its own would be inadequate visual relief for the development envisaged by the Millbrook Zone if more intensive development was to occur within the Plateau Area of the eastern end of Wharehuanui Hills.

5.5 Effects of subdivision, access roading on the Hillside and the Plateau of Wharehuanui Hills

5.5.1 The effects of earthworks and access roads on both Hillside and Plateau areas as well the combined and cumulative effects of subdivision and development on the Plateau Area will inevitably change the character and landscape of the eastern end of the Wharehuanui Hills.

6. Historic Settlement Patterns

6.1 Early settlement of the Basin was on the valley floor for practical reasons of shelter, access and water. This usually resulted in buildings being set at the junction between valleys and hills. In my opinion early settlement patterns provides an important cue for where to place new development. In more recent times rural residential development has occurred on the

higher ice shaped hills for reasons of view and sun which has, and can lead to poor landscape outcomes and incongruous development out of character with established settlement patterns.

7. Planning History

- 7.1 Existing and past planning policies and objectives of the last 20 years have generally sought to limit or restrict development of the ice-shaped hills.
- 7.2 Under the earlier PDP then ODP the ice shaped hills have been classified as Visual Amenity Landscape (VAL) which allows for some development on a discretionary basis. Assessment of development applications has been fairly rigorous by the objectives, policies and assessment matters applicable to VAL. Zoning the Plateau 'Precinct' contradicts and is a major change from the planning objectives and policies of the last 20 years and in my view is flawed.

8. COMMENT ON EVIDENCE OF QLDC LANDSCAPE ARCHITECT

- 8.1 In Ms Gilbert's para. 30.9 the WB Study found that in relation to LCU 6: 'Generally, the areas reads as a rural residential landscape in which buildings are reasonably well integrated by landform and vegetation. Whilst larger, more 'rural' lots are evident, overall the amenity plantings throughout tend to contribute parkland rather than a working rural landscape impression.'
- 8.2 In my opinion the eastern end does not read as a rural residential landscape and its questionable that it has 'a parkland character' although recent plantings and mown areas around the buildings and outlying areas could be described as parkland.
- 8.3 In 30.10 Ms Gilbert outlines the proposed planning regime for the Precinct which sees:

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'the introduction of a restricted discretionary approach for all subdivision triggering the consideration of a wide range of landscape matters that will ensure that any future subdivision and development will appropriately respond to the landscape characteristics of the specific and in, so doing, safeguard the landscape characteristics of the Plateau and surrounds.'

- 8.4 While in general I agree with the approach as a way of achieving good landscape outcomes I consider parts of the unit including the eastern portion would not have its characteristics safeguarded. The level of development anticipated by the Precinct would inevitably completely change and impact on the existing characteristics of openness, legibility and a reasonable degree of naturalness. Domestication would be the inevitable consequence.
- 8.5 In Para. 30.16 Ms Gilbert discusses the ribbon of rural residential development opposite the submitters land and states that: 'this patterning does not provide an appropriate cue for additional rural residential development throughout the considerably more generously proportioned flat land to the north of the road'.
- 8.6 I agree in part with this comment and as previously stated also agree that the views across the open rural flats to the hillslopes and escarpment faces are important to rural character, and allow for appreciation of the hill faces.
- 8.7 However in my opinion a cluster type rural residential development model provides an alternative that would retain the views across the open rural flats to the escarpment hillslopes and consolidate and balance to some extent the one sided ribbon of rural residential development and allow for, and enable a 'defensible edge to Lake Hayes Rural residential. The cluster style rural residential development is explained in more detail under Amended Relief below.

9. AMENDED RELIEF

- 9.1 The relief sought remains as per the submission i.e. to rezone the elevated land 'The Plateau' from Precinct to Amenity Zone and for the flat land to be rezoned from Amenity Zone to Precinct. However the amended relief seeks limited and comparatively small development nodes within generous areas of open space by way of a 'Structure Plan' (refer Appendix 2 Arrowburn Structure Plan). In my opinion this takes the cue from, and respects the historic settlement pattern by placing the development on the valley floor at (or near) the junction of flat and hillslope.
- 9.2 The development nodes would consist of a cluster style development with the balance a 'Building Restriction Area'. The Building Restriction Area includes a 75m setback off Speargrass Flat Road, whilst retaining open rural flats and views to the escarpment hillside.
- 9.3 The development nodes would be a 'comprehensive and 'design lead development' (as promoted by Ms Gilbert in her evidence for Lifestyle Precinct) with strict design controls on building design, form, materials and colours. A mix of lot sizes within the development nodes is envisaged which would allow a more interesting, diverse and flexible layout and design. The building and landscape would be based on a strong rural vernacular theme with appropriate and sympathetic architecture using stone, timber, steel and an emphasis on natural and organic materials.

10. RELEVANT OBJECTIVES AND POLICIES IN CHAPTER 24 WAKATIPU BASIN ZONE (STAGE 2 PROPOSED DISTRICT PLAN)

The relevant objectives and Policies in Chapter 24 Wakatipu Basin Zone are assessed below in relation to Amended Relief Sought as it applies to the proposed Arrowburn Structure Plan (refer Appendix 2).

10.1 **24.2.1** Objective - Landscape and visual amenity values are protected, maintained and enhanced.

24.2.1.1 Implement minimum and average lot sizes within the Wakatipu Basin Rural Amenity Zone and the Wakatipu Basin Lifestyle Precinct to protect landscape character and visual amenity values.

A mix of lot sizes within the development nodes is proposed to provide an interesting and diverse layout which will protect and enhance landscape character.

24.2.1.2 Ensure subdivision and developments are designed (including accessways, services, utilities and building platforms) to minimise modification to the landform, and maintain and enhance the landscape character and visual amenity values.

Accessways (including services and utilities) are via existing accessways off Speargrass Flat Road. Building platforms are located within Development nodes on low relief or flat land to minimise modification to the landform. Landscape character and visual values will change but not be degraded. Rural character and views to the hillslopes will be maintained.

24.2.1.3 Ensure that subdivision and development maintains and enhances the Wakatipu Basin landscape character and visual amenity values identified for the landscape character units as described in Schedule

Subdivision and development will maintain and enhance the WB landscape character and visual amenity values identified for LCU 8 (Speargrass Flat) appropriate to the proposed Precinct in the Amended Planning Map submitted by X-Ray Trust and Avenue Trust.

24.8. 24.2.1.4 Maintain and enhance the landscape character and visual amenity values associated with the Zone and Precinct and surrounding landscape context by controlling the colour, scale, form, coverage, location (including setbacks from boundaries and from Identified Landscape Features) and height of buildings and associated infrastructure, vegetation and landscape elements.

The proposed Arrowburn Structure Plan and stringent design control on building form, height, design, colour, materials and coverage will change but maintain and enhance the landscape character and visual amenity values associated with the Precinct and adjoining zone. A 75m setback from Speargrass Flat Road is proposed. 24.2.1.5 Require all buildings to be located and designed so that they do not compromise the qualities of adjacent or nearby Outstanding Natural Features and Outstanding Natural Landscapes, or of identified landscape features.

There are no ONLs or ONFs that are close or adjacent and the identified landscape feature on the ridge of LCU6 is not affected or impacted.

24.2.1.6 Ensure non-residential activities avoid adverse effects on the landscape character and visual amenity values.

Non-residential activity will be limited to existing farming use.

24.2.1.7 Control earthworks and vegetation clearance so as to minimise adverse changes to the landscape character and visual amenity values.

Earthworks and vegetation clearance (Pasture) will be controlled and comply with QLDC standards.

24.2.1.8 Ensure land use activities protect, maintain and enhance the range of landscape character and visual amenity values associated with the Zone, Precinct and wider Wakatipu Basin area.

Land use activities will protect, maintain and enhance the range of landscape character and visual amenity values associated with Lifestyle Precinct and wider Wakatipu Basin.

24.2.1.9 Provide for activities that maintain a sense of openness and spaciousness in which buildings are subservient to natural landscape elements.

Cluster type residential development restricted to small development

nodes and Building Restricted Areas will maintain a sense of openness

and spaciousness and buildings will be subservient to natural landscape elements.

24.2.1.10 Facilitate the provision of walkway, cycleway and bridle path networks.

24.2.1.11 Manage lighting so that it does not cause adverse glare to other properties, roads, public places or the night sky.

Lighting will be managed to avoid adverse glare and comply with Council lighting standards relating to glare.

24.2.1.12 Have regard to the spiritual beliefs, cultural traditions and practices of Tangata Whenua.

No consultation undertaken at this stage.

10.2 **24.2.5** Objective - The landscape character and visual amenity values of the Precinct are maintained and enhanced in conjunction with enabling rural residential living opportunities.

24.2.5.1 Provide for rural residential subdivision, use and development only where it protects, maintains or enhances the landscape character and visual amenity values as described within the landscape character unit as defined in Schedule 24.

Rural residential subdivision, use and development is carefully located where it protects, maintains and enhances the landscape character and visual amenity values as described within the landscape character unit (LCU 8). The capability to absorb additional development for the Unit in the WB Study is defined as 'High around Lake Hayes Rural Residential.'

24.2.5.2 Promote design-led and innovative patterns of subdivision and development that maintain and enhance the landscape character and visual amenity values of the Wakatipu Basin overall.

A design led, cluster style, comprehensive development is proposed with strong design controls appropriate to the location that will be a positive addition to the LCU and WB as a whole.

24.2.5.3 Provide for non-residential activities, including restaurants, visitor accommodation, and commercial recreation activities while ensuring these are appropriately located and of a scale and intensity that ensures that the amenity, quality and character of the Precinct is retained.

Not applicable

24.2.5.4 Implement minimum and average lot size standards in conjunction with building coverage and height standards so that the landscape character and visual amenity qualities of the Precinct are not compromised by cumulative adverse effects of development.

A mix of lot sizes within the development nodes is proposed to provide an interesting and diverse layout and design which will protect and enhance landscape character and avoid cumulative adverse effects. The style of

development will not be a continuation of the existing rural residential development within LCU12 or incremental development creep.

24.2.5.5 Maintain and enhance a distinct and visible edge between the Precinct and the Zone.

There is opportunity to develop a distinct and visible edge between the Precinct and the Zone at the western end of the Precinct.

24.2.5.6 Retain vegetation where this contributes to landscape character and visual amenity values of the Precinct and is integral to the maintenance of the established character of the Precinct

The vegetation is predominantly pasture. While this will be reduced open pasture will be maintained within the Building Restricted Areas.

11. CONCLUSIONS

- 11.1 The ice shaped elevated moraine hills and ridges are an important landform and landscape characteristic of the WB Basin that have been given inadequate recognition and protection in the WB Study. They require careful landscape management to safeguard their characteristics.
- 11.2 The Plateau Area of LUC 6 that includes the X-Ray Trust, Avenue Trust property and the Donaldson Block has significant and important landscape characteristics that need to be safeguarded.
- 11.3 The Plateau Area has different characteristics to some other parts of LUC 6 including larger block sizes, less enclosure, greater visual exposure, fewer trees. a greater degree of naturalness and generally less developed.
- 11.4 The elevated Plateau Area is visually prominent at the eastern end of the Basin from a number of locations and importantly provides a foil and visual relief to adjacent development (in particular to offset the building density of Millbrook West).

- 11.5 Precinct Zoning over the Plateau Area will result in significant landscape and visual effects and will not safeguard identified landscape characteristics.
- 11.6 Early settlement patterns on the valley floor provides an important cue for where and how to place new development.
- 11.7 Planning over the last 20 years has generally sought to limit and safeguard characteristics of the ice-shaped hills.
- 11.8 The proposed planning regime for the Precinct Zoning of the elevated Plateau Area i.e. 'a restricted discretionary approach that triggers the consideration of a wide range of landscape related matters' would not safeguard landscape characteristics and would considerably exceed the site's threshold for development.
- 11.9 Carefully located and comprehensively designed cluster style development on the Flat Area within contained nodes of development and large Building Restricted Areas, while retaining rural views will result is a better landscape outcome than Precinct Zoning of the elevated Plateau Area.

Philip Blakely Registered Landscape Architect

12. APPENDICES

Appendix 1: Photographs

Appendix 2: Arrowburn Structure Plan



Photo 1. View west of L.C.U.6. including part of Avenue Trust, X-ray Trust, Upper Millbrook Resort and Donaldson Block.



Photo 2. Aerial View east of L.C.U. 6 (Wharehuanui Hills), L.C.U. 8 (Speargrass Flat) and L.C.U. 11 (Slope Hill Foothills)



Photo 3. Aerial view east with L.C.U.6 on left, Speargrass Flat (L.C.U.8) centre and Slope Hill foothill (L.C.U.11) on right.



Photo 4. View N.W. across 'The Plateaus Area' from the ground which is open and visually exposed.



Photo 5. View South West from Malaghans Road from east of Millbrook Entrance. Millbrook West development occupied slopes of ridge. The Plateau of L.C.U.6 is a reasonably prominent skyline ridge and provides an important foil and relief to development.

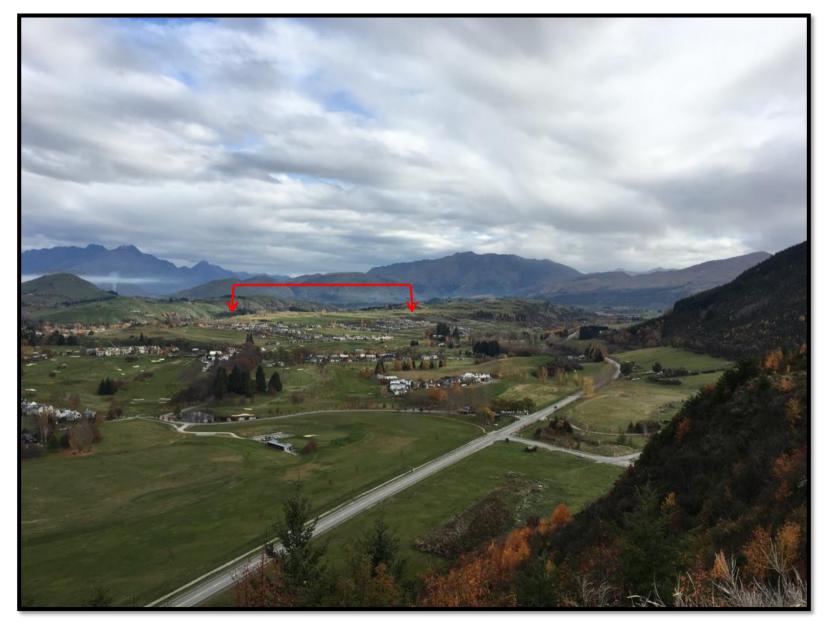


Photo 6. View from summit of Feehlys Hill adjacent to Arrowtown to eastern end of L.C.U.6 – The Plateau Area (approx. 2km) (L.C.U. 6 is a significant component of this view and reads as a largely undeveloped ridge and provides visual relief to Millbrook Resort development.



Photo 7. View from Upper Tobins Track. Although quite distant view (approx. 4.5 km), the ridges (ice-shaped hills) and lack of development on both sides of Speargrass Flat (L.C.U.6 and L.C.U.11) are clearly read and visible.



Photo 8. View from lower Hogan Gully Road to the 'Plateau Area' (approx. 2km) with Coronet Peak at rear. Note: views of the Plateau are obtained from several locations on Hogan Gully Road

