

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

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Rural Hearing
Stream 2 (Rural, Rural
Residential & Rural
Lifestyle, and Gibbston
Character Zone
chapters)

**STATEMENT OF EVIDENCE OF MARION READ
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

LANDSCAPE

6 APRIL 2016

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1. INTRODUCTION

- 1.1 My full name is Marion Read. I am the principal of my own landscape planning consultancy, Read Landscapes. I have been in this position since June 2013. My experience and qualifications are set out in my Evidence in Chief for the Introduction and Strategy Proposals of the Proposed District Plan (**PDP**), dated 19 February 2016.
- 1.2 I have been engaged by the Queenstown Lakes District Council (**QLDC**) to provide evidence in relation to landscape matters for the Rural Hearing Stream for the PDP, in particular for the Rural, Rural Residential & Rural Lifestyle, and Gibbston Character Zone chapters. I have previously prepared one statement of evidence for the PDP hearings, as mentioned above.
- 1.3 Although this is a Council hearing I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
- 1.4 The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:
- (a) QLDC Operative District Plan;
 - (b) QLDC Proposed District Plan;
 - (c) Lakes Environmental Report to Queenstown Lakes District Council entitled 'Landscape Lines in the Queenstown Lakes District;
 - (d) Read Landscapes, 'Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features', 2014;
 - (e) Read Landscapes, 'Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features: Post review amendments', 2014; and
 - (f) Read Landscapes, 'Wakatipu Basin Residential Subdivision and Development: Landscape Character Assessment', 2014.

1.5 I have attached the following to this evidence:

- (a) **Appendix A:** *Landscape Lines in Queenstown Lakes District* report, (8 July 2011);
- (b) **Appendix B:** *Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features*, (1 April 2014);
- (c) **Appendix C:** *Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features: Post review amendments* (16 October 2014); and
- (d) **Appendix D:** *Wanaka Building Restriction Area*.

2. EXECUTIVE SUMMARY

2.1 The key conclusions in my evidence are that:

- (a) The methods used to determine the landscape category boundaries are robust;
- (b) Relying on light reflectance values, in concert with hue, as a means of managing the appropriate external colours and materials for buildings in the rural zones has limitations. These can be alleviated by requiring applicants to show that their proposed, non-paint finished, materials are of a suitable hue and recessive appearance.
- (c) With regard to building size and height, allowing a 500m² building to 8m in height as a permitted activity could result in the degradation of the landscape. It will remain possible to limit development rights associated with building platforms at the subdivision stage to ensure that designs appropriate for the landscape context are achieved, but a volume of 4000m³ will now be the permitted baseline.
- (d) The methods proposed to manage farm buildings are appropriate and should prevent the proliferation of buildings across the landscape. There are some minor duplications within the matters of discretion which can be removed without weakening the provisions.
- (e) The assessment matters in the PDP for development in the ONLs and ONFs are much clearer and more straight forward than those of

the PDP but cover the same issues ensuring that the appropriate management of these landscapes and features will be facilitated.

- (f) The assessment matters in the PDP for development in the Rural Landscape classification are much clearer and more straight forward than those of the PDP but cover the same issues. They allow for the variations in character which occur across the landscape ensuring that the appropriate management of all parts of these landscapes will be facilitated.
- (g) The assessment matters in the PDP for development in the Gibbston Character zone are appropriate for managing the distinct character of that part of the rural landscape. Allowing frost machines to be constructed within the zone as a permitted activity, subject to standards relating to colour and density of distribution, is considered to be appropriate.
- (h) A reduction in the area of the building restriction area (**BRA**) adjacent to Anderson Heights and State Highway 6 in Wanaka is considered to be appropriate.
- (i) The provisions of the PDP in relation to the Bobs Cove Rural Residential zone are identical to those of the ODP. It is considered that this is appropriate.
- (j) The 2ha average lot size in the Rural Lifestyle zone, combined with a 1ha minimum, is considered appropriate to ensure that rural character and amenity can be maintained.
- (k) Exterior alterations to a building outside of a building platform in the Rural Lifestyle zone is a restricted discretionary activity under the PDP and this is supported in order to avoid adverse effects on the surrounding landscape.
- (l) The planting of most wilding species which are problematic within the District is to become a prohibited activity. This is positive as it will assist in limiting the adverse effects on the landscape of wilding spread.

3. BACKGROUND / SCOPE

3.1 In this evidence, I address the following:

- (a) the methods used to identify the landscape classification boundaries;
- (b) permitted activity standards for buildings in the rural zones;

- (c) the landscape assessment matters for the Rural and Gibbston Character zones;
- (d) the Wanaka BRA;
- (e) the Bobs Cove Rural Residential zone;
- (f) lot sizes in the Rural Lifestyle zone;
- (g) visibility of buildings in the Rural Lifestyle zone; and
- (h) the planting rules regarding wilding exotic trees.

3.2 I have provided QLDC with a number of technical reports that have been used in the development of the PDP. These reports are summarised in paragraphs 3.2 to 3.7 of my Evidence in Chief for the Introduction and Strategic Chapters of the PDP dated 19 February 2016 (**SD Evidence**), which I refer to and adopt rather than repeating here.

4. LANDSCAPE CLASSIFICATION BOUNDARY MAPPING – METHOD OF ASSESSMENT

4.1 I discussed the importance of the District's landscapes and the need to manage them in my SD Evidence at paragraphs 4.1 to 4.7. I confirm and adopt that evidence.

4.2 In that evidence I also discussed the technical reports which I had provided to Council which determined the locations of the boundaries between the various landscape classifications of the District, particularly the Outstanding Natural Landscapes (**ONL**) and Outstanding Natural Features (**ONF**) which have been notified as a part of the PDP. I have been asked to provide further detail regarding the methods used in the development of these reports.

4.3 The first of these reports was completed in 2011 and is entitled, 'Landscape Lines in Queenstown Lakes District' (attached as **Appendix A** to this evidence (**2011 Report**)). It was commissioned as part of QLDC's review of the Rural zones and was intended to determine the appropriate locations of the lines separating the landscape categories defined in the ODP.

4.4 In that report I set out the method that I used to determine the appropriate locations of these boundaries. It had four aspects:

- (a) Extensive field work was undertaken in order to gain a clear understanding of the landscapes of the Wakatipu and Upper Clutha basins.

- (b) The characteristics of the three landscape classifications as set out in the ODP (ONLs and ONFs, Visual Amenity Landscapes (**VAL**), Other Rural Landscapes (**ORL**)) were used as a reference. Thus, to determine the boundary between the ONL and VAL landscapes, the landscape on the ONL side had to approximate the ONL description from the plan, and the land on the VAL side the VAL description;
- (c) A process of matching like with like was undertaken. As lines had previously been drawn and features identified in the text of the ODP, an analysis of the characteristics of the landscape on either side of the already determined lines provided the necessary information to extend those lines;
- (d) The 'amended Pigeon Bay factors' were applied to evaluate the quality of landscapes where the matching process was not adequate or appropriate;
- (e) Existing work was used, such as reports on resource consent applications (by myself and other QLDC staff) and reports I had written for QLDC on the appropriate location of town boundaries for Wanaka and Queenstown in 2009.
- (f) Aerial photographs were used as the basis for the final mapping enabling a plan view analysis to complement my field work analysis.

4.5 The 'amended Pigeon Bay factors' are a series of factors or aspects of landscape which are to be considered when assessing whether or not a landscape qualifies as an ONL or ONF. They were originally proposed in the Canterbury Regional Landscape Study of 1993¹, but have been modified and simplified over the years. They gain their name from their first consideration by the Environment Court in the Pigeon Bay Aquaculture case² and they were further modified in the Wakatipu Environmental Society *et al*³ decision. In that decision the Environment Court set out the factors (although they referred to them as criteria) as⁴:

- (a) *The natural science factors – the geological, topographical, ecological and dynamic components of the landscape;*
- (b) *Its aesthetic values including memorability and naturalness;*

1 Boffa Miskell Ltd and Lucas Associates, 1993, P28.

2 Pigeon Bay Aquaculture Ltd v Canterbury Regional council [1999] NZRMA 209.

3 Wakatipu Environmental Society Inc v Queenstown Lakes District Council [2000] NZRMA 59.

4 Wakatipu Environmental Society Inc v Queenstown Lakes District Council [2000] NZRMA 59 at paragraph 72.

- (c) *Its expressiveness (legibility): how obviously the landscape demonstrates the formative processes leading to it;*
- (d) *Transient values: occasional presence of wildlife; or its values at certain times of the day or of the year;*
- (e) *Whether the values are shared and recognised;*
- (f) *Its value to tangata whenua;*
- (g) *Its historical associations.*

4.6 Following this decision these factors were included in the ODP at 5.4.2.1 (although shared and recognised values were omitted). While these factors are not without their critics within the profession, they have become institutionalised as a required template for the assessment of landscape quality.

4.7 The method used was based on the assumption that it was the determination of the accurate locations of some of the landscape classification boundaries that remained at issue.

4.8 In 2014 I was asked to update the 'landscape lines' report. At this time the purpose had changed as the Government had indicated an intention to amend the RMA to make it mandatory for councils to identify their ONLs and ONFs on their planning maps. The methods used were the same as for the previous report. The main differences between this report, (titled '*Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features*' and is attached as **Appendix B** to this evidence (**2014 Report**)), and the 2011 Report was that the 2014 Report was more comprehensive. This was because it was necessary to ensure that all of the ONFs and ONLs of the District were correctly identified. This meant that it included an assessment of the rivers of the Upper Clutha Basin (the Cardrona and Hawea Rivers) and the islands in the lakes which had not been considered previously. In addition Mount Alfred and Diamond Lake were identified as ONFs. There was no specific assessment made of the other rivers of the District which are all imbedded within ONLs.

- 4.9** The 2014 report was peer reviewed by Mr Ben Espie (in respect of the Wakatipu Basin) and Ms Anne Steven (in respect of the Upper Clutha Basin). Both peer reviewers provided critique and made recommendations. This resulted in further modifications to the locations of some boundary lines.
- 4.10** Subsequent to Mr Espie's review, I removed a number of small areas in the Wakatipu Basin from the surrounding ONL. Subsequent to Ms Steven's review of the Upper Clutha Basin part of the report, a number of further areas were included within the ONL or identified as ONFs, and some others removed. The classification of the Hawea River as an ONF was deleted, for example. My decisions as to what to amend and what to adopt from the reviewers' recommendations were based on a combination of:
- (a) an assessment of the cogency of the reviewer's argument;
 - (b) the reapplication of the 'like with like' principle; and
 - (c) the need to maintain consistency across both time and space.
- 4.11** I then issued a report detailing the changes made in response to the peer reviews, entitled, *'Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features: Post review amendments'* (this report is attached as **Appendix C**).
- 4.12** The final maps included in the final report were then copied into QLDC's GIS system, and I understand notified as part of the PDP.
- 4.13** In addition to determining the appropriate location of the boundaries of the ONLs and ONFs of the District, I discussed a number of general issues in the reports. These primarily related to the definition of 'arcadian' in terms of the landscapes of the District. I also discussed the inapplicability of this type of landscape aesthetic to the Upper Clutha Basin. In addition I discussed the issues which have arisen owing to the requirement of the ODP to attribute a landscape classification to the Frankton Arm of Lake Wakatipu. I understand that these discussions helped inform the decision to establish the Rural Landscape classification, and the decision to exclude the Frankton Arm from the landscape classification system.

5. PERMITTED ACTIVITY STANDARDS FOR BUILDINGS – RURAL, RURAL RESIDENTIAL, RURAL LIFESTYLE, AND GIBBSTON CHARACTER ZONES

5.1 The PDP sets out the standards for structures and buildings in the Rural, Rural Residential, Rural Lifestyle and Gibbston Character zones. In each of these zones the PDP proposes to make the construction of dwellings with up to a 500m² footprint on a registered building platform, a permitted activity provided the building complies with a series of standards. These standards are listed in Table 3 of Chapter 21 Rural, Table 2 of Chapter 22 Rural Residential and Rural Lifestyle, and Table 2 of Chapter 23 Gibbston Character Zone.

Building Materials and Colours

5.2 The standards for buildings in the Rural zone are set out at 21.5.15, at 22.5.1 for the Rural Residential and Rural Lifestyle, and 23.5.1 for the Gibbston Character Zone. Non-compliance leads to restricted discretionary activity status. The standard specifies that the exterior colours of all buildings are to be within the range of browns, greens and greys, except soffits. These colours are the same as those recommended in Council's 'Guide to Reducing Glare and Reflection in the Queenstown Lakes District' which has been in use in the District for most, if not all, of the last ten years. These recommended colours have become a standard within the rural areas of the District and, I consider, are clearly effective in making buildings appear recessive within the District's landscapes.

5.3 The standard specifies a maximum light reflectance value (**LRV**) of 20% for roofs and 30% for all other surfaces. This ensures that darker shades are used which practice shows is an effective way to reduce the visual prominence of buildings within the landscape of the District. It is necessary to combine controls over both colour and LRV, as some colours with low LRVs would still be obtrusive in the District's landscapes. Paint companies and pre-coloured steel manufacturers test their products and provide LRV information in their catalogues, meaning that it is certain whether the product achieves the LRV standard or not. Consideration was given to including in the standards a list of appropriate cladding materials for which similar information is not available. In the past an assessment of materials for which an LRV was not available entailed a comparison being made between the material and a material with a known LRV. The limitations of this method are obvious.

5.4 A number of submitters (368, 452, 457, 608) would like to see a list of permitted materials included in the PDP. In my view including an exclusive list of exterior materials would be too restrictive as new materials might be developed, or become fashionable, which were entirely suitable but as they were not included on the list would result in the need for consent. Further, it is the visual effect of the cladding that requires management, not its materiality.

5.5 I consider that there are many materials for which no LRV can be readily determined which are appropriate within this landscape. Schist is the obvious one. Bagged schist, however, can be almost as prominent as a concrete wall, and concrete is often problematic. While it is possible to colour concrete with oxides and by using coloured aggregates these have never been popular options. Uncoloured concrete foundations which can be hidden by planting, on the other hand, need not be problematic. Unstained cedar is a popular choice of material, but when weathered it, and some other timbers, fades to a shiny silver colour which would not be acceptable as a paint finish. Timber can be stained to achieve an appropriately recessive appearance, but the precise LRV of these stains cannot be determined. Copper is becoming a popular choice for guttering and downpipes, and for roofs. This is very shiny, bright and very prominent when new, but fairly rapidly oxidises to a dark dull brown which is appropriately recessive. Given time, however, copper will continue to oxidise until it is a bright, turquoise blue (in approximately ten to fifteen years⁵).

5.6 In summary, I consider that schist; stained timber; concrete coloured with either oxides, dark aggregate or both; zinc and corten steel are appropriate exterior materials within this District's landscapes. I consider bagged schist; Oamaru stone; unstained timbers and raw concrete to be inappropriate in most circumstances as all are pale coloured and visually prominent.

Building size and Building height⁶

5.7 Rules 21.5.16, 22.5.3 and 23.5.2 specify that the maximum ground floor area for any building shall be 500m². Rule 21.5.17 (and rules 22.5.8 and 23.5.3) limits the height of buildings to 8m. While no submitters have challenged the

5 http://www.copper.org/applications/architecture/arch_dhb/additional/finishes/weathering_chart.html downloaded 17th March, 2016

6 Rules 21.5.16 and 21.5.17 (Rural), 22.5.3 and 22.5.8 (Rural Residential and Rural Lifestyle), and 23.5.2 and 23.5.3 (Gibbston Character).

height limit, a number (368, 444, 452, 497, 501, 610) challenge the limit of 500m² for the size of buildings.

5.8 For context, the average floor area of a house in New Zealand is 149m² and the average floor area of houses built in New Zealand since 2010 is 205m^{2.7}. The proposed standards, therefore, allow for the construction of a large building as a permitted activity.

5.9 The purpose of the maximum footprint and height standards is to control the potential bulk of built form in these zones. The PDP would, in theory, enable the construction of a building which could have a footprint of 500m², be 8m in height, have a flat roof, and subsequently have a volume of 4000m³. A height of 6 to 6.5m is adequate to allow for the construction of a single story dwelling with a pitched roof. To again provide context, a dwelling standing 6m to the apex of a pitched roof with a footprint of 500m² would have a volume of approximately 2500m³. As noted above, submissions request the removal of the 500m² limitation. The removal of this standard (or standards) could allow for a building with a 1,000m² footprint with a flat roof, and a volume of 8,000m³ as a permitted activity. While in some locations this might not be problematic, in many others it could be, resulting in monolithic structures which do not relate to their context or to the broader landscape and with significant adverse effects on that landscape, and on visual amenity.

5.10 Where building platforms are required (in the Rural General, Gibbston Character and Rural Lifestyle zones) the landscape assessment of these platforms is of the building envelope they create. In practice this rarely approaches an envelope of anything close to 8000m³. In most instances design controls are proposed by applicants (and sometimes imposed by Council) which significantly reduce this envelope. Examples of such controls include:

- (a) Limiting future buildings to a height which is less than the limit for the zone;
- (b) Limiting the area of the building platform which may be built upon;
- (c) Requiring a pitched roof (often in addition to other controls);
- (d) Limiting the length of any single façade; and

(e) Drawing the building platform around the foot print of an already designed dwelling.

5.11 It is likely, but not certain, that most of the undeveloped consented platforms in the subject zones have some of these types of restrictions on the possible built form which may be built on them.

5.12 The eventual construction of a dwelling on a building platform which has been registered (and subject to a thorough assessment prior to consent being granted) is a controlled activity under the ODP. The construction of dwellings in the Rural Residential zone is a controlled activity under the ODP also. It is the case that the intention under the PDP to allow for buildings of up to 500m² in area and 8m in height as a permitted activity is a very significant liberalisation, particularly as a dwelling of this volume would become a part of the permitted baseline to be used in consideration of future building platforms.

5.13 I have come to the conclusion that allowing the construction of dwellings of up to 500m² in area and 8m in height as a permitted activity is too permissive. In my opinion there are alternatives which would both liberalise the level of control exerted on landowners, and ensure the protection of the landscape. The first of these alternatives would be to reduce the footprint allowable to 300m². This would permit the construction of relatively simple dwelling (in this District's terms). The construction of anything larger could remain a controlled activity, rather than a restricted discretionary activity, as it is currently in the PDP. This would enable Council to manage any adverse effects of larger buildings on the landscape, their context, and on visual amenity. It would also mean that there would still be a liberalisation of the planning regime. I understand however from Mr Barr, that there are no submissions seeking this change.

5.14 The second alternative would be to specify the volume of built form, rather than limit the footprint. This would allow for flexibility of design but would control the potential bulk of a building. For example, if the limit were 2500m³³⁸ this would allow a building of 6m in height with a footprint of 500m² (with a pitched roof) or at 8m height, a footprint of 312.5m². Again I understand there are no submission seeking this change.

⁸

Noting that 2400m³ is the equivalent of a 300m² footprint built to 8m.

Farm Buildings – Rural Zone

- 5.15** Rule 21.5.18 enables the construction of farm buildings⁹ as a permitted activity in the Rural zone.
- 5.16** The standards which must be complied with are similar to the rules in the ODP for controlled activity farm buildings and are similarly intended to facilitate farming activities while managing effects on the landscape. Farm buildings are an essential part of the landscape character of the District and enabling their construction in this manner for farming purposes would not be expected to have an adverse effect on that character.
- 5.17** It is appropriate, in my opinion, to manage the construction and distribution of farm buildings on land holdings of less than 100ha. Particularly within the Wakatipu Basin many landholdings are smaller than 100ha. The design of 'farm buildings' on smaller, lifestyle type properties is often not in keeping with the vernacular or with the character of the area. Allowing farm buildings as a permitted activity on these sites could lead to a proliferation of buildings across the landscape with adverse effects on landscape character and on the visual amenity of the public and neighbours.
- 5.18** Submission 145 says there is no justification for increasing the possible density of farm buildings from one per 50ha as in the ODP to one per 25ha in the PDP. I agree with this position and consider that increasing the allowable density increases the risk of adverse effects on the landscape from a proliferation of built form.
- 5.19** Submission 519 requests that containers be exempt from the standards for farm buildings. Containers are a convenient 'instant shed' but are a product which comes in every possible colour and state of repair. They have high potential to be eyesores within the landscape and I consider that it is important that the standards for rural buildings should apply to them.
- 5.20** Submission 600 requests that 'rural amenity' be removed from the matters of discretion which apply to the construction of farm buildings at 21.5.18 of the PDP. The remaining matters would be:
- (a) Landscape character;

9

A farm building is defined in Chapter 2 as a building necessary for the exercise of farming activities (with some specific exclusions).

- (b) Privacy, outlook and rural amenity from adjoining properties;
- (c) Visibility, including lighting;
- (d) Scale;
- (e) Location.

5.21 Odours and noise would seem to be the only aspects of 'rural amenity' which would not remain covered, and these are dealt with elsewhere in the PDP. Further, the rural amenity of adjoining properties remains a matter of discretion. Consequently, I consider that the removal of 'rural character' as a separate consideration would have little impact on the ability of Council to ensure that farm buildings were appropriate in the landscape.

5.22 Submission 600 also requests that 'visual amenity' be removed from the matters of discretion applying to the exterior colours of farm buildings at 21.5.19. 'Visual prominence' would remain a consideration. I am unable to imagine a situation where the colour of a building would affect visual amenity without it also making the building prominent. I consequently consider that the deletion of this matter of discretion would not diminish Council's ability to appropriately manage the exterior colours of farm buildings within the landscape.

Rule 22.5.9 Glare - Rural Residential and Rural Lifestyle zones

5.23 Standard 22.5.9 provides lighting standards for the Rural Residential and Rural Lifestyle zones. Non-compliance with the lighting standards in the ODP is a non-complying activity, as is the same matter in the PDP.

5.24 Lighting can have significant landscape effects, highlighting residential (and other) development which is almost invisible by day. The locations where this effect is problematic are largely restricted to the Rural zone. As residential development is anticipated within the Rural Lifestyle and Rural Residential zones the main concern about lighting is to do with residential amenity in these zones.

5.25 The PDP also includes Rule 22.5.9.3, which requires that there should be no upward light spill. I am uncertain as to the purpose of including Rule 22.5.9.3 unless this is an aviation requirement. While any move to require compliance

with the International Night Sky Association¹⁰ guidelines would be positive in my opinion, particularly in the rural areas of the District, it would require more complex rules than those proposed.

- 5.26** The absence of any lighting controls in the Rural Landscape and ONL/ONF areas appears to be an oversight. It is within these areas of the District that inappropriate lighting would have the most significant landscape effects. I understand that this has been raised by submission and that it has been addressed by Mr Barr.

6. LANDSCAPE ASSESSMENT MATTERS – RURAL ZONE

- 6.1** As with the ODP the assessment matters that apply to an activity or development are dependent on the landscape classification of the site. These assessment matters apply to discretionary and non-complying activities only (including variations to existing consents).

21.7.1 ONFs and ONLs

- 6.2** The assessment matters for ONFs and ONLs in the PDP are located in 21.7.1 and are the same. The distinction between those for the Wakatipu Basin (**ONL(WB)**) and the ONL (District Wide) that was in the ODP, has not been carried over into the PDP. This will provide more consistency in the management of the ONLs and ONFs of the District. I consider that this is appropriate as the approach of the ONL(WB) has proved to be very effective. It has always been my understanding that the differential regime was simply a response to development pressure. As the development pressure throughout the entire District increases it is logical that the level of protection of the ONLs across the District, which are a significant scenic resource for the District (in addition to those in the Wakatipu Basin), should increase also.
- 6.3** The ONF and ONL assessment matters in 21.7.1, are prefaced with a statement that '*the applicable activities will be inappropriate in almost all locations within the zone*'. This statement is taken from S1.5.3iii(iii) of the ODP, in its explanation of discretionary activities. In the ODP it also applies to all ONLs and ONFs, although particular emphasis is given to the Wakatipu and Upper Clutha Basins. Consequently this explanation is not new and continues

10 <http://darksky.org/lighting/lighting-basics/> downloaded 21st March, 2016

to be one which I consider is necessary for the appropriate management of the District's ONLs and ONFs.

6.4 Assessment matter 21.7.1.1 provides:

The assessment matters are to be stringently applied to the effect that successful applications will be exceptional cases.

6.5 This text has been taken from the preamble located at S5.4.2.2(1) of the ODP which provides that:

These assessment matters should be read in the light of two further guiding principles. First that they are to be stringently applied to the effect that successful applications for resource consent will be exceptional cases.

6.6 In the ODP the principle only applied to ONL(WB) and ONFs district-wide. Consequently the wider application of the assessment matters is a key change in the PDP that increases the protection provided to ONLs outside of the Wakatipu Basin. As noted previously, I consider that this is a necessary step to ensure the appropriate management of the ONLs of the District.

6.7 Assessment matter 21.7.1.2 refers to existing vegetation and, as I understand, is intended to prevent landowners planting boundary hedges and then applying for development on the basis that the vegetation means the development cannot be seen. This is a direct carry over from the ODP and I consider that its inclusion is appropriate.

Effects on landscape quality and character

6.8 Assessment matter 21.7.1.3 requires an assessment of the effects of a proposal on the quality and character of the ONL or ONF. Landscape character has been defined as:

*A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse*¹¹

11 Swanwick, C. (2002). Landscape Character Assessment: Guidance for England and Scotland. Published by The Countryside Agency and Scottish Natural Heritage. P 8.

- 6.9** The quality of the landscape should be, or in most cases has been, determined by the application of the Amended Pigeon Bay Factors, as discussed above, and is considered to be a landscape to which section 6(b) of the RMA applies. Specifically, in regards to 21.7.1.3:
- (a) Subsections a., b., and c. are a restatement of the 'Amended Pigeon Bay Factors';
 - (b) Subsection d. requires the consideration of any development proposal against factors a., b., and c. in order to ensure that the landscape would not be degraded by the development, noting that in some cases the quality may actually be enhanced; and
 - (c) Subsection e. requires an assessment as to whether or not any proposed new boundaries have an adverse effect on the landscape. This assessment matter is directly equivalent to assessment matter 5.4.2.2(1)c(iii) in the ODP.
- 6.10** A part of landscape character is the value which is ascribed to the landscape. This value may relate to the aesthetic coherence of a landscape character area, or to the intactness of its natural and physical processes. The inclusion of a development which disrupts the aesthetic coherence of an area, or which diminishes the natural processes would, in my view, be a degradation of the quality of the landscape. When the absorptive capacity of a landscape is being discussed, this relates to the ability of that landscape to retain the important aspects of its character which are valued intact.

Effects on visual amenity

- 6.11** Assessment matter 21.7.1.4 requires an assessment of the effects of a development proposal on visual amenity. Visual amenity has been defined as, '*the overall pleasantness of the views [people] enjoy of their surroundings*'.¹² I note the following points:
- (a) Subsection a. is a direct reproduction of assessment matter 5.4.2.2(1)b(i) in the ODP. Under the ODP this assessment matter only applies to the ONL(WB) and ONFs. I consider that extending it to cover the other ONLs of the District is prudent to ensure that the visual amenity provided by these landscapes is maintained into the future;

12 Landscape Institute and Institute of Environmental Management and Assessment. (2013). Guidelines for Landscape and Visual Impact Assessment. Routledge: London. P 21.

- (b) Subsection b. is slightly modified from the assessment matter found at 5.4.2.2(1)b(ii) of the ODP which reads, '*The proposed development will not be visually prominent such that it dominates or detracts from public or private views otherwise characterised by natural landscapes*'. I consider that the PDP wording is better than the ODP wording as it makes it clear that the viewers may be either outside of or within the ONLS, or on the ONF. It is also not the naturalness of the landscape which is important, as implied in the ODP, but the outstandingness, of which naturalness, of varying degrees in practice, is a necessary requirement as per the RMA;
- (c) Subsection c. requires that screening or other elements that hide a proposed development from view should be in keeping with the character of the landscape. This is a rewording of the ODP assessment matter 5.4.2.2(1)b(iii) and the change simply serves to clarify its meaning;
- (d) Subsection d. replaces the ODP assessment matter 5.4.2.2(1)b(v). Its wording is very slightly altered for clarity, but its intention is unchanged;
- (e) Subsection e. replaces the ODP assessment matter 5.4.2.2(1)c(i). The issue of whether or not a structure breaks the line and form or ridges, hills or slopes is a matter of visual amenity; and
- (f) Subsection f. replaces the ODP assessment matter 5.4.2.21c(ii) which states, '*any proposed roads, earthworks and landscaping will not affect the naturalness of the landscape*'. This is an oxymoron as roading, and earthworks in particular, inherently diminish the naturalness of the landscape. The issue is, again, one of visual amenity.

Design and density of development

6.12 Assessment matter 21.7.2.5 *Design and Density of Development* is a new Assessment for both ONLs and ONFs (compared to the ODP). This section has however, been adapted from 5.4.2.2(3)c of the ODP where the assessment matter relates only to VALs. Development within the ONLs and on ONFs is, and has always been, anticipated in only exceptional circumstances. This principle has, and will, continue to apply pressure to ensure that the design of proposed developments is sensitive to the landscape and visual constraints of the site. The inclusion of this assessment matter in

the ONL/ONF assessment matters could be seen as a 'belt and braces' approach. It provides further direction regarding the design constraints which need to be considered for development to be acceptable within these important landscapes. I consider its inclusion to be appropriate for this reason.

Cumulative effects of development on the landscape

6.13 Assessment matter 21.7.1.6 requires an assessment of any cumulative effects on the landscape which may accrue from a proposed development. Two different sets of cumulative effects assessment matters relate to the ONL(WB), the ONL(DW). In my opinion, all the existing ODP assessment matters regarding cumulative effects are, complex and confusing. As the fundamental issue in any part of the landscape is whether or not development which is in addition to other existing development is a step too far, there seems no need for complexity. Assessment matter 21.7.1.6 applies to both ONLs and ONFs and states:

Cumulative effects of subdivision and development on the landscape. Taking into account whether and to what extent existing, consented or permitted development (including unimplemented but existing resource consent or zoning) may have degraded:

- (a) *The landscape quality or character; or,*
- (b) *The visual amenity values of the landscape.*

The Council shall be satisfied the proposed development, in combination with these factors will not further adversely affect the landscape quality, character or visual amenity values.

6.14 It is clear from this assessment matter that the assessment requires a determination of:

- (a) the current state of the landscape, in particular any existing adverse effects on its quality and character, and any existing adverse effects on its aesthetic coherence and pleasantness;
- (b) the effects of the proposed development; and
- (c) whether or not the effects of the proposed development further adversely affect the landscape.

6.15 This is clear, straightforward and appropriate. I consider that it is also positive that it clearly states that permitted activities may degrade the landscape.

6.16 In conclusion I consider the cumulative effects assessment matters as proposed in the PDP to be superior in their drafting and, in part as a

consequence, to be likely to provide a better outcome in their application than under the ODP.

Other

- 6.17** In the ODP ONL(WB) and ONF assessment matters there is a section requiring the assessment of any positive effects. This section relates mainly to ecological enhancement but also raises questions about esplanade strips, covenants and other legal mechanisms of environmental protection. In my opinion these are not landscape assessment matters, although clearly important. These issues are now included at 21.7.3 (Other factors and positive effects applicable in all landscape categories) of the PDP, which I consider appropriate.

21.7.2 Rural Landscape Classification

- 6.18** Section 21.7.2 of the PDP lists the assessment matters which are to be applied to the balance of the rural landscapes, the Rural Landscape classification (**RCL**). They replace the assessment matters which related to the VALs and to the Other Rural Landscapes (**ORL**) in the ODP. These Assessment matters are prefaced with the statement that '*applicable activities are inappropriate in many locations*'. This statement is currently located at S1.5.3iii(iv) of the ODP, which explains the reasons for the classification of activities as discretionary. It applies to VALs only, the concerns regarding development in Other Rural Landscapes in the ODP being restricted to the effects on the amenities of neighbours.
- 6.19** Applying the VAL principle to all RCL areas may seem to be increasing the stringency of the assessment required (submitter 456 requests that the ORL assessment matters be reinstated in the belief that they apply to much of the District). In fact it is important to note that there have only ever been two confirmed areas of ORL in the District, the Hawthorn Triangle and a small area (a single site) of Rural General land adjacent to Lake Wanaka to the west of Beacon Point. It is proposed, under the PDP, that the Hawthorn Triangle ORL be rezoned as a part of a larger Rural Lifestyle zone. Consequently, the area to which these proposed assessment matters will apply is virtually contiguous with the VAL of the District as it is currently understood.
- 6.20** The ODP includes at 4.2.4(3) a description or characterisation of the VAL. This is intended to identify the landscapes of the District to which s7(c) of the

RMA applies, that is, the landscapes for which decision makers must have particular regard to for the maintenance and enhancement of amenity values. As much of the District normally considered to be VAL does not have this character, it has been seen by some developers as a goal to be fulfilled in these areas.

- 6.21** I discussed the difficulties with this characterisation in my SD Evidence at paragraphs 5.3 to 5.6. The PDP Rural Landscape Classification assessment matters have been written in such a way as to ensure that development will be so designed as to be appropriate to its specific context. In this way the local character and amenity of varying areas of the District may be effectively managed by the same matters. For example, the character and valued amenity of Morven Ferry is quite different to the character and valued amenity of the Crown Terrace and to the character and valued amenity of the Ballantyne Road rural area in the Upper Clutha Basin. A development which was appropriate in one of these areas would likely be less appropriate, or inappropriate, in others.
- 6.22** I note that concerns have been raised by submitters regarding the use of the word 'inappropriate' with regard to activities in the Rural Landscape zone. These submitters correctly point out that this language is used in the Act in regard to ONLs and ONFs only. The Oxford Compact English Dictionary defines 'appropriate' as 'suitable or proper' with 'inappropriate' simply being its antonym. In my opinion, 'unsuitable' or 'improper' are entirely appropriate adjectives with which to describe development which has an adverse effect on the landscape of the Rural Landscape zone, that is, development which would neither maintain nor enhance the amenity of the vicinity.
- 6.23** The assessment matters of the PDP in relation to the Rural Landscape zone are similar to those for the ONL and ONF except that they focus on the maintenance of amenity, rather than the protection of outstanding natural landscape from inappropriate development.
- 6.24** The assessment matters of the PDP, for ONLs and ONFs, and the Rural landscape, are based on those of the ODP but they have been restructured so as to separate the assessment of landscape effects from those of visual effects. These were confused in the ODP. This is in keeping with best practice, and, in my opinion, makes for a simpler and clearer assessment process. Some of the more obscure assessment matters which had been based on an analysis of the settlement patterns of the Wakatipu Basin, but

were not readily understood by planners, landscape architects or commissioners, have been removed ((5.4.2.2(3)c(v)). In my opinion the landscape assessment matters in the PDP are clearer in intent, and will be much easier to apply than those of the ODP.

Effects on landscape quality and character

6.25 Within the Rural Landscape classification effects on landscape quality and character '*shall be taken into account*' (21.7.2.3). Any adverse effects on the quality and character of an adjacent ONL or ONF must be assessed. Whether, and the extent to which, the scale and nature of a proposed development might degrade the quality and character of the surrounding landscape must be assessed also. The degree to which the design and any landscaping would be compatible with or enhance the landscape is also to be assessed.

6.26 These assessment matters should ensure that development is designed so as to 'fit in' to its context. If it did not do so that would be an adverse effect on the quality and / or character of the landscape in its vicinity. In this way developments of different characters in different parts of the Rural Landscape can be assessed using the same assessment matters without resulting in any homogenisation of the District's landscapes. That is, it replaces what many perceived as a goal (the development of an Arcadian landscape) with the goal that local landscape character be maintained. I consider that this is an effective way of ensuring that the varying character and qualities of the Rural Landscape are not lost.

Effects on visual amenity / design and density of development

6.27 The assessment matters relating to effects on visual amenity require the assessment of effects on the visual amenity of both public and private views. They aim to ensure that mitigation does not create adverse visual effects.

6.28 The assessment matters relating the design and density of development are intended to provide a framework by which to assess the appropriateness of a development to its site and context.

6.29 Both of these groups of assessment matters, in addition to those regarding landscape character and quality, are adaptations of assessment matters already in use in the ODP. Together the entire collection of assessment matters provides a framework within which a design led development regime

can operate. That is, they give a clear indication of Council's expectations of how development should relate to its landscape context. I consider that this should be effective in assisting both developers and those tasked with assessing their proposals.

Tangata Whenua, biodiversity and geologic values

6.30 The Assessment of Tangata Whenua, biodiversity and geologic values in 21.7.2.6 ensures that these issues are addressed within the Rural Landscape classification. I understand that the most threatened ecological areas in the District are located within the Rural Landscape and that Mr Davis is to provide detailed evidence in this regard. These important features are captured by the Amended Pigeon Bay factors with regard to the ONLs and ONFs of the District.

Cumulative effects of development on the landscape

6.31 It has been acknowledged that the ODP has not managed the cumulative effects of development on the VAL well¹³.

6.32 Assessment matter 21.7.2.7 applies to the Rural Landscape and states:

Cumulative effects of development on the landscape:

Taking into account whether and to what extent any existing, consented or permitted development (including unimplemented but existing resource consent of zoning) has degraded landscape quality, character, and visual amenity values. The Council shall be satisfied:

- (a) The proposed development will not further degrade landscape quality, character and visual amenity values, with particular regard to situations that would result in a loss of valued quality, character and openness due to the prevalence of residential or non-farming activity within the Rural Landscape.*
- (b) Where in the case resource consent may be granted to the proposed development but it represents a threshold to which the landscape could absorb any further development, whether any further cumulative adverse effects would be avoided by way of imposing a*

covenant, consent notice or other legal instrument that maintains open space.

- 6.33** This assessment matter requires an assessment of the condition of the existing landscape, a determination of the effects of the proposal and a determination of any additional adverse effects, as is the case with the ONL/ONF assessment matter. There is, however, a leaning towards the maintenance of openness, in the sense of a lack of buildings, within the Rural Landscape. This is because the maintenance of open space is considered critical to the maintenance of the rural landscape.

Other factors and positive effects, applicable in all other landscape categories (ONF, ONL and RLC)

- 6.34** Section 21.7.3 addresses other factors and positive effects which may accrue from development in all landscape categories.
- 6.35** Assessment matter 21.7.3.1 indicates that the provision of building plans may be preferable to the nomination of a building platform in indicating that a proposed development is appropriate. The provision of building plans is particularly helpful in undertaking landscape and visual assessments of proposals as it eliminates many variables, and is, in my experience, already commonly done for applications for development within ONLs. I consider this to be positive and support this assessment matter.
- 6.36** Assessment matter 21.7.3.2 is specifically applicable to the assessment of proposals for non-residential developments in the rural areas and requires an assessment be made of the degree to which the proposal is consistent with rural activities and the rural resource and whether or not it would maintain or enhance the quality and character of the landscape. I support this provision as it acknowledges that there are significant proposals, from time to time, which are not residential in nature, but which may be appropriate in the rural landscape.
- 6.37** Assessment matter 21.7.3.3 requires the assessment of possible positive effects. Most of the aspects of this assessment matter are not, strictly speaking, landscape matters, although they may have an effect on the landscape.

7. LANDSCAPE ASSESSMENT MATTERS – GIBBSTON CHARACTER ZONE

- 7.1** The assessment matters for the Gibbston Character zone in 23.7 are essentially similar to those of the Rural Landscape Classification. This is a continuation of the position taken by the ODP. This recognises both that the landscape of the Gibbston Valley has a similar level of importance and aesthetic value to the VALs of the District, and that the viticultural use of the valley requires a different management regime. The assessment matters are slightly oriented towards prioritising the management of visual amenity effects on the users of State Highway 6 and of the cycle trails. This too is similar to the approach of the ODP and I consider the continuation of this approach to be appropriate.
- 7.2** A submitter (12) has raised the issue of wind mills for frost fighting within the Gibbston Character zone. Under the PDP these would breach the 10m height limit and would require resource consent as a non-complying activity. Under the ODP these wind mills have been considered to be buildings and have required comprehensive assessments as non-complying activities as a result. It is the case that there are portable frost fighting wind mills, the use of which would be a permitted activity. While these are not quite as high (8.2m in one example¹⁴) they would have similar effects on the landscape to the permanent machines, although less predictable. It is my opinion that these wind mills are an integral part of the viticultural landscape. They are lean structures, quite different to other rural buildings, and, provided the tower is coloured a suitably recessive colour, have no adverse landscape effects. It is my understanding that a frost fan can provide suitable cover for an area of 5.5 to 7ha.¹⁵
- 7.3** Consequently I consider that these fans should be a permitted activity subject to specific standards. In my view, the landscape related standards should require the tower to be coloured in a grey, green or brown with an LRV of less than 30%, and that the density of fans across the landscape should be no greater than one per 5.5ha. Controls over noise and other aspects of possible nuisance should also apply but these are beyond my expertise.

14 http://www.towandblow.co.nz/features_portable_wind_machine/ downloaded 3rd April 2016.

15 <http://www.summerfruitnz.co.nz/Grower/Articles/Frost%20fans> downloaded 22nd March 2016.

8. BUILDING RESTRICTION AREAS – RURAL ZONE

- 8.1 A number of areas have been identified within the ODP as building restriction areas (**BRA**), and these are carried over to the PDP.
- 8.2 Submitter 502, Allenby Farms, has submitted that the building restriction area adjacent to the State Highway to the south west of Mount Iron should be removed. From a landscape perspective, I agree with this proposition in part. Had there been a setback required from the escarpment edge so that buildings in Mount Iron Drive and Rob Roy Lane were not visible from the highway it would have served the purpose of maintaining a rural edge to Wanaka. No such setback has been imposed. Further, with the Three Parks plan change operative, this area is fully within the urban form of Wanaka. It does, however, provide a natural and attractive foreground to views of Mount Iron from the west. In my opinion the building restriction area could be reduced to the area illustrated in **Appendix 1** attached to this evidence.

9. BOB'S COVE – RURAL RESIDENTIAL ZONE

- 9.1 The Bob's Cove Rural Residential zone (and sub-zone) has special provisions (in Table 5) distinguishing it from other Rural Residential Zones. These controls have been rolled over from the ODP into the PDP. While I do not know the detailed history of these provisions, in my view they together ensure that development within the zone will have a distinct character which is subservient to the surrounding ONLs.
- 9.2 Submissions have been received seeking the removal of the special provisions, but not the specific objectives and policies which apply to the sub-zone. These objectives, 22.2.6 and 22.2.7 do provide continued direction for the development of the sub-zone, particularly with regard to open space and ecological and amenity value. Without the rules which enact these policies, it is unclear to me how the QLDC would ensure the objectives and associated policies were achieved.
- 9.3 There are ten performance standards in the PDP which apply to the Bob's Cove Rural Residential sub-zone (at 22.5.21 to 22.5.30 in Table 5). Of these, four relate to physical measurements:

- (a) Standard 22.5.21 restricts the maximum building height in the sub-zone to 6m. Removing this standard would allow construction of dwellings to 8m in height. This would increase the potential bulk of buildings to a degree which has not been anticipated through the assessment of the zone, and this could negatively impact on amenity both within the sub-zone and in views from the Glenorchy Road;
- (b) Standard 22.5.22 restricts the setbacks from roads to 10m and from the Glenorchy Road to 15m. Removing this standard would result in all setbacks being 10m. This would in my view have a negative impact on the visual amenity of users of the Glenorchy Road impacting views across the area to the lake;
- (c) Standard 22.5.24 restricts residential density to one unit per 4,000m² which is the same as the Rural Residential Zone so its deletion would not impact on the development rights within the Bob's Cove zone; and
- (d) Standard 22.5.26 restricts internal setbacks to 10m. Removing this standard would result in a reduced setback of 6m which would in my view have a negative impact on the internal amenity of the sub-zone.

9.4 In my opinion these changes in combination would have a moderately small impact on the character and quality of the subzone.

9.5 Of more significance would be the removal of the other six standards. These all relate to landscaping:

- (a) Standard 22.5.23 limits the height of vegetation in the 'open space' areas of the sub-zone to 2m in height so as to maintain pastoral character and to avoid obscuring views to the mountains and lake. The objective 22.2.7 only requires 'appropriate landscaping' and the maintenance of view shafts. The removal of the specific standards for the sub-zone, therefore, would potentially lead to quite a different outcome;
- (b) Standard 22.5.26 requires indigenous planting to be undertaken adjoining the development area and if a dwelling is proposed within 50m of the Glenorchy Road, that this planting must have survived at least 18 months prior to construction taking place. It is possible that this planting has all been completed. If not, the removal of this standard would allow for the construction of dwellings without prior

- planting which would alter the anticipated character of the development and the visual amenity from the Glenorchy Road;
- (c) Standard 22.5.27 requires planting to be undertaken between a dwelling proposed within 50m of the Glenorchy Road and that road. Landscaping within 15m is to be completed prior to construction and planting between 15m and 50m to be completed during the first planting season following construction. These requirements are similar in nature to common Consent Notice conditions. Their removal would allow for dwellings to be constructed within 50m of the Glenorchy Road without the completion of any indigenous planting. In my view, this would dramatically alter the character of the development and would potentially have significant adverse effects on the visual amenity of users of the Glenorchy Road;
- (d) Standard 22.5.28 requires that no building be erected in the Undomesticated Areas of the sub-zone. It is my understanding that this encompasses much of the open areas adjacent to the Glenorchy Road. Removing this standard would allow for the development of these areas. In my view, this would significantly alter the character of the sub-zone from what was anticipated, and adversely affect the visual amenity of users of the Glenorchy Road;
- (e) Standard 22.5.29 requires that at least 75% of the zone be set aside as undomesticated area. At least 50% of this area is to have a continuous cover of indigenous vegetation retained, established and maintained. It requires that this be given effect to by Consent Notice and covenants. If this has occurred, then it is my understanding that the standard is no longer necessary, but I consider that this is likely a legal question. If it has not occurred then the removal of this standard could result in a change in the character of the sub-zone and a diminution of the amenity anticipated; and
- (f) Standard 22.5.20 requires at least 50% of the undomesticated area within the sub-zone to be retained, established and maintained in indigenous vegetation. This is to be detailed in a landscaping plan provided as a part of any subdivision application, and at least 90% of the vegetation must survive the first 5 years. I am unclear as to the extent of subdivision completed within the sub-zone, or the amount of land left available under the current development limits. I consider that this standard is central to the character which was anticipated for the sub-zone and I am opposed to any dilution of this.

10. LOT SIZE RULE – RURAL LIFESTYLE ZONE

- 10.1** Rule 27.5 specifies that the minimum lot size for the Rural Lifestyle zone shall be 1ha, provided that the average lot size at subdivision is not less than 2ha. This is a carry-over of the existing rule in the ODP. There are a number of submitters who want this minimum reduced to 1ha.
- 10.2** The Rural Lifestyle zones are intended to provide for rural living opportunities¹⁶. Policy 22.2.1.2 of the PDP states that the purpose of establishing minimum density standards is '*so the open space, natural and rural qualities of the District's distinctive landscapes are not reduced*'.
- 10.3** It is my general observation that 2ha enables the keeping of animals and other productive land uses which are characteristic of the broader rural landscape and which cannot be sustained on smaller lots. Such an area ensures a sense of spaciousness and the maintenance of some other aspects of rural amenity such as quietness.
- 10.4** The PDP includes several new areas of Rural Lifestyle zoning. In part this is intended to direct residential development into parts of the landscape better able to absorb development and away from the more sensitive areas which have remained Rural Landscape. From a pragmatic point of view, if subdivision to 1ha is allowed in the Rural Lifestyle zones (and more than one submitter has said they consider two dwellings could be constructed on each building platform making the density of a Rural Lifestyle zone almost indistinguishable from the Rural Residential zone) then people wishing to have a few horses, raise a few sheep or alpacas or grow a few olives will have to move, again, to the Rural Landscape zone. I consider the effects of this on the landscape, particularly in the Wakatipu Basin, would be adverse.
- 10.5** One area which I consider could absorb development at the density of 1ha lots is within the Hawthorn Triangle, specifically the land bounded by Lower Shotover, Speargrass Flat and Domain Roads. This is for two reasons. The first is that a significant proportion of that land has already been subdivided into lots approximating 1ha in area already. The second is that there is little if any rural character remaining within that area now. It would seem sensible to

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22.1, P 22-2 of the PDP

increase the potential density of development there and protect the amenity of the surrounding landscape.

11. VISIBILITY OF BUILDINGS – RURAL LIFESTYLE ZONE

11.1 Rule 22.4.3 details the performance standards for the construction of buildings within the Rural Lifestyle Zone. It provides that non-compliance with the standard for exterior alterations for a building located outside of a building platform would be a Restricted Discretionary activity. One of the areas of discretion is visibility from public places. I consider that this is appropriate. When building platforms are approved the visibility of a dwelling on the platform is assessed from all relevant public locations both within and outside of the zone. In the case of dwellings outside of a building platform this check has not been undertaken. Consequently, it is possible that a non-complying extension could be visually prominent and adversely affect the landscape outside of the zone.

12. PLANTING RULE – WILDING EXOTIC TREES CHAPTER

12.1 Rule 34.4.1 prohibits the planting of wilding exotic trees. These are mainly conifers but include sycamore, hawthorn and boxthorn. Wilding trees are, in my opinion, a significant problem within the District from a landscape perspective. I am not an ecologist but understand that they are a problem from an ecological perspective also – this aspect is covered in the evidence of Mr Glenn Davis for the Council.

12.2 Wilding trees displace indigenous vegetation and, indeed, pasture. This has the effect of homogenising the landscape, reducing the subtle changes in the colour and texture of vegetation that give visual cues as to the underlying topography and hydrology. Conifers can grow vigorously at higher altitudes than our indigenous forest, obliterating the subalpine shrub lands which provide a transition between the indigenous forest and the high tussock grasslands. It is notable that a number of the ONLs of the Wakatipu Basin in particular are actually infested with a mix of these species. Of particular note are the face of Coronet Peak and the Crown Terrace escarpment.

12.3 From a landscape perspective the most striking effect of the spread of wilding vegetation is the change in character which it produces. While the landscape without the wildings is one radically modified by a thousand years of human interventions, the wildings change it totally. Hawthorn obscures many of the

rock faces of Peninsula Hill and of Malagans Ridge. Douglas fir blankets the hillsides around Queenstown and spread over the southern face of Coronet Peak. This is changing the landscape character from one which is of this place into one which is indistinguishable, for many, from parts of North America or Europe.

- 12.4** I also consider that silver birch should be included in the rule. Silver birch, which has been planted frequently as an amenity tree throughout the Wakatipu Basin and elsewhere in the District, is now proving to be a wilding threat also. I have found wilding silver birch just outside the boundary of Mount Aspiring National Park near Paradise, and wilding silver birch seedlings can be seen all over the face of Coronet Peak in the autumn, appearing as small orange flames.



Marion Read

6 April 2016