

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

UNDER
the Resource Management Act 1991

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

SUBMITTERS
Cardrona Cattle Company Limited
(CCC Ltd)

SUMMARY STATEMENT OF EVIDENCE OF TONY DOUGLAS MILNE
ON BEHALF OF CARDRONA CATTLE COMPANY LIMITED

DATED: 12 August 2020

INTRODUCTION

1. My full name is Tony Douglas Milne. My qualifications and experience are set out in my Evidence in Chief.
2. This Summary of Evidence sets out the key points within my Evidence in Chief. I have also read the rebuttal evidence of Mr Matthew Jones¹ on behalf of Queenstown Lakes District Council, and I have responded to his comments.
3. I table an A3 document titled '*CCCL GIZ Hearing Further Exhibits*'. This contains zone photo overlays, an updated structure plan and additional ZTV mapping in response to Mr Matthew Jones second rebuttal evidence.

THE PROPOSAL – LANDSCAPE AND VISUAL MATTERS

4. The application site is partly zoned Rural with an overlay of ONL and Designation 76 (Landfill Buffer) and partly Gibbston Character Zone, located outside an ONL.
5. The localised receiving environment for the site is Victoria Flats. The values of the ONL are primarily associated with the surrounding mountainous landforms which contribute to high natural character, landscape and amenity values. On the Flats, a rural character exists due to a dominance of open space and low density of built form. Land use across Victoria Flats has intensified since establishment of the QLD landfill and now includes, industrial and recreation activities. Mitigation treatments for these activities includes bunding, planting along the highway corridor and shelterbelt planting, these human interventions have allowed significant modification to occur but have reduced the naturalness and openness of the river terrace.
6. The application site is relatively flat and open, has a rural character, exhibits human modifications and a pastoral land use. Landscape and amenity values are largely associated with the broad scale landforms which surround Victoria Flats. Amenity values are reduced in proximity to adjacent land uses, particularly the QLD landfill. The south part of the site is contained by a localised basin landscape and has a somewhat limited visual influence.
7. Analysis of the site's attributes and modifications, a ZTV study and an assessment of the site's landscape sensitivity have been undertaken. This analysis has informed the proposed Structure Plan in which the proposed Developable/Activity Areas are in areas of lower landscape sensitivity and lower visual influence, these are considered to be appropriate locations for potential future development.
8. I consider it essential that the Structure Plan Areas are paired with provisions regarding mitigation planting, setbacks, building height, building coverage and building form, material and colour to ensure effects on landscape and visual amenity are acceptable and a rural-industrial character prevails.
9. In the context of landscape effects on the ONL, I consider that the application site has capacity to absorb a degree of development as both the site and the river terrace are modified and portray values which clearly differ from the values of the ONL. I consider effects on the landscape values of the ONL will be in the range of moderate to low.
10. In the context of visual amenity effects, I consider a pared back, rather than generic version, of the GIZ as proposed does not necessarily equate to an urban form. The proposed Structure Plan displays an appropriate response to the site and paired with appropriate provisions will ensure that the rural-industrial character that will result from the development of the zone is not urban in character because of its scale, intensity, visual character and dominance of built structures.

¹ Rebuttal Evidence of Matthew Jones. Landscape Architecture – Rezonings – Rural Visitor Zone. 12 June 2020.

LANDSCAPE MATTERS RAISED

11. In his second rebuttal evidence², Mr Jones remains opposed to the rezoning relief sought. While he states that he generally concurs with the attributes and values outlined in my evidence in chief, he references the following points of disagreement.
12. At 5.8, Mr Jones considers the presence of shelterbelts, bunds and mitigation planting has been overstated. I do not consider this to be the case as bunds located along the highway corridor have been implemented adjacent to multiple recent developments and have reduced the sense of openness and naturalness experienced by users of the highway corridor.
13. At 5.10, Mr Jones describes the qualities of the site in its own right including the 'open nature of the terrace / flats'. I have described the site in a similar way in my evidence and chief and do consider the openness of the Flats to contribute to the amenity of Victoria Flats.
14. At 5.11, Mr Jones considers the effects on amenity from the adjacent land uses have been overstated. I do not consider this to be the case, though the landfill and quarry activities themselves are not visible, the bunding along the highway corridor and shelterbelt at the landfill boundary are obvious modifications in the landscape.
15. At 5.12, Mr Jones considers the visibility of the site has been underplayed and describes the north site and eastern reaches of the south site as being visible for long stretches along SH6. I disagree. Referring to the ZTV analysis on sheet 20, I consider the views of the site are intermittent and the visible area of the site changes as one traverses Victoria Flats from the intersection of Victoria Flats Road around the bend of the oxbow.
16. At 5.13, Mr Jones states that he considers the measurement threshold for the site to be against whether future development will protect the landscape values of the ONL. I concur with this statement to the extent that part of the CCCL site is within an ONL and clarify that I have not implied that a pristine natural landscape is the threshold. However, when assessing landscape sensitivity, an understanding of existing patterns of development and modifications is necessary to determine the appropriateness of future development and thus how it will affect landscape values.
17. At 5.14, Mr Jones refers to the constraints identified in paragraph 16 of my evidence in chief. While identified as constraints, I have provided assessment of these points in (c), (d), and (e) in the 'Matters Raised' section of my EIC.
18. At 5.16, Mr Jones describes the proposal as allowing for large scale changes and new and uncharacteristic features to occur in the landscape. He also considers the GIZ to be an urban form of development. I do not consider this to necessarily be true as additional provisions regarding scale, form, density and materials/colour are proposed to ensure development is appropriate within the rural context.
19. At 5.18 and 5.22, Mr Jones describes the building heights in conjunction with an 80% site coverage provision will result in the introduction of an inappropriate built form and scale. I concur with his assessment and consider that the provisions now provided regarding form, coverage, materials/colour, setbacks and mitigation planting will ensure an outcome which is palatable within the context.
20. At 5.23, Mr Jones questions as to whether the ZTV analysis is to respective ground level. We had undertaken ZTV analysis for ground level (sheet 20 of the GA), 6m and 10m in relation to views of the south site. These layers of analysis were utilised to inform the locations of the zones on the Structure

² Second Rebuttal Evidence of Matthew Jones. Landscape Architecture – Rezoning – Rural Visitor Zone + General Industrial Zone. 19 June 2020.

Plan. Two new exhibits have been appended demonstrating the 6 and 10m ZTV studies. These further studies demonstrate that only some of the proposed Developable/Activity Areas will be visible and paired with the planted amenity setbacks and further provisions, I consider that the site will be able to absorb the scale of development proposed.

CONCLUSION

21. I can understand the concern around allowing a generic GIZ zoning that allows a high level of development potential, with limited design controls and one that is quite a stark difference from the existing and adjacent character. However, the quality of the environment contained on the site is somewhat overlooked due to the backdrop, therefore there is plenty of opportunity for enhancement that is enabled through development. A GIZ with a more tailored set of provisions in combination with a structure plan, would ensure an outcome palatable in the context of the ONL and GCZ, where landscape and visual effects are contained within this rural setting.