

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

IN THE MATTER of the Resource
Management Act 1991

AND

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

**STATEMENT OF EVIDENCE OF BRIDGET MARY GILBERT
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

LANDSCAPE ARCHITECTURE – RURAL VISITOR ZONE – REZONING

18 March 2020

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1. INTRODUCTION

1.1 My full name is Bridget Mary Gilbert. I am a Landscape Architect and Director of Bridget Gilbert Landscape Architecture Ltd, Auckland. I hold the qualifications of Bachelor of Horticulture from Massey University and a postgraduate Diploma in Landscape Architecture from Lincoln College. I am an associate of the Landscape Institute (UK) and a registered member of the New Zealand Institute of Landscape Architects.

1.2 I have practised as a Landscape Architect for over twenty-five years in both New Zealand and England. Upon my return to New Zealand, I worked with Boffa Miskell Ltd in their Auckland office for seven years. I have been operating my own practice for the last fifteen years, also in Auckland.

1.3 During the course of my career I have been involved in a wide range of work in expert landscape evaluation, assessment and advice throughout New Zealand, including:

- (a) landscape assessment in relation to regional and district plan policy;
- (b) preparation of structure plans for rural and coastal developments;
- (c) conceptual design and landscape assessment of infrastructure, tourism, rural, coastal, and urban development; and
- (d) detailed design and implementation supervision of infrastructure, tourism, rural, coastal, and urban projects.

1.4 Of particular relevance to Proposed District Plan (**PDP**) Stage 3B, I have been involved in:

- (a) the conceptual design, and landscape and visual effects assessment, of a range of visitor accommodation (and other tourism and rural living-related) developments in high-value landscape settings, including on Waiheke Island, Kawau Island, Rakino Island, Great Barrier Island, Bay of Islands,

Awhitu Peninsula, Coromandel Peninsula, and Lake Pukaki;
and

- (b) the assessment and identification of outstanding natural landscapes (**ONLs**) and outstanding natural features (**ONFs**), and the development of appropriate policy for ONLs and ONFs as part of district plan review processes (e.g. Rodney District Plan, Hauraki Gulf Islands District Plan, Waipa District Plan, Whangarei District Plan, Thames Coromandel District Plan).

1.5 I have recently completed (or am nearing completion of) districtwide landscape studies for Tasman District and Waitomo District that identify ONLs and ONFs (together with amenity landscapes in the case of the Waitomo study).

1.6 I have assisted Queenstown Lakes District Council (**Council**) with landscape advice in relation to the Wakatipu Basin Variation in Stage 2, and landscape-related aspects of appeals on Stage 1 of the PDP with respect to Chapters 3 and 6, and a number of rezoning appeals also allocated to Stage 1.

1.7 I am currently a panel member of the Auckland Urban Design Panel and an Independent Hearing Commissioner for Auckland Council.

1.8 I have been asked by Council to provide evidence in relation to landscape architectural matters associated with two site-specific Rural Visitor Zone (**RVZ**) rezoning requests as follows:

- (a) M & K Scott (Loch Linnhe Station); and
- (b) Richard and Sarah Burdon and Glen Dene Ltd (Lake Hāwea Holiday Park).

1.9 Due to time constraints, consideration of the landscape-related aspects of the RVZ rezoning requests have been considered by three landscape architects: Ms Helen Mellsop, Mr Matthew Jones, and myself.

1.10 The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:

- (a) the notified Chapter 46 Rural Visitor Zone of the PDP;
- (b) the landscape assessment supporting the Section 32 Evaluation Report for the Rural Visitor Zone;
- (c) The PDP Stage 3B submissions in relation to Loch Linnhe and Lake Hāwea Holiday Park; and
- (d) PDP Stage 1 evidence and Panel Reports of relevance to the Loch Linnhe and Lake Hāwea Holiday Park Stage 3B submissions.

1.11 I have visited Loch Linnhe Station and the Lake Hāwea Holiday Park and am familiar with the wider landscapes within which these sites are located.

1.12 I have also considered the landscape implications of the ‘Topic 2.2’ Environment Court decision¹ in the preparation of this statement of evidence. In particular, I have borne in mind the overarching policy directives from the Court that the District Plan should protect landscape values within ONLs and ONFs and development within ONLs and ONFs should be ‘reasonably difficult to see’. I have also taken into account the ‘Exemption Zone’ concept, which I understand is designed to recognise legacy special zones/sub zones that already exist in the ODP, within for example ONF/Ls or section 7 amenity landscapes. I understand that ‘new’ special zones could become ‘Exemption Zones’, but there is a need to achieve the objectives and policies in Chapters 3 and 6 of the PDP in the first instance.

1.13 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.

2. SCOPE

2.1 My evidence is structured as follows:

- (a) Executive Summary.
- (b) A Background section in which I briefly outline my understanding of the context for the RVZ within the District and the landscape work that helped to inform the notified provisions (Background).
- (c) An outline of the approach that I have undertaken in evaluating the appropriateness of the proposed RVZ zoning on each submission site (Evidence Approach).
- (d) Discussion of each submission site based on a high level landscape analysis and which includes: recommendations as to how RVZ might be successfully absorbed on each site together with confirmation of whether I oppose or do not oppose the relief sought, in terms of landscape effects.

3. EXECUTIVE SUMMARY

3.1 With respect to the Loch Linnhe submission (**31013**), I consider that based on a high level landscape analysis there is potential for both proposed Areas 1 and 2 (shown on Figures 1 and 2 below) to successfully absorb a modest level of rural visitor industry development.

3.2 For the Lake Hāwea Holiday Park submission (**31043**), it is also my view that based on a high level landscape analysis there is potential to successfully absorb a modest level of rural visitor industry development.

3.3 In my opinion, a proposed RVZ on both of these submission sites could potentially be appropriate, subject to additional landscape assessment

as specified in my evidence and dependent on the outcomes of the analysis, and also assuming:

- (a) A restricted discretionary or discretionary regime for buildings that would allow the Council to carefully control the number, extent, location and appearance of buildings (and associated infrastructure etc.) to ensure an appropriate landscape outcome.
- (b) A location-specific, structure plan type approach for the proposed RVZ areas. This may take the form of identifying Building Restriction Areas (**BRAs**), building platforms, accessways (including public routes), vegetation features to be retained, and landscape restoration / framework planting areas in addition to location specific development controls in relation to the external appearance of buildings.
- (c) Some sort of 'blend' of these strategies that responds to the site-specific circumstances. An example of this approach might be to identify BRAs and existing vegetation to be protected on a location specific plan, with RVZ development outside of the BRA and vegetation features provided for as a restricted discretionary or discretionary activity.

3.4 From a landscape perspective, a structure plan approach is preferred for each submission site due to the very high landscape values as evidenced by their identification as within an ONL. In my opinion, the specificity associated with a structure plan approach gives plan users certainty that the proposed rezoning will be appropriate from a landscape effects perspective. In particular, a well-crafted structure plan gives confidence that landscape values will be protected and that RVZ development will be reasonably difficult to see.

3.5 Unless both submitters undertakes the recommended landscape analysis and dependent on the outcomes of the analysis, I confirm that there is insufficient information and I do not support either RVZ rezonings.

4. BACKGROUND

- 4.1 It is my understanding that the proposed RVZ is intended to provide for appropriately located and scaled rural visitor industry development within the District's ONLs.²
- 4.2 ONLs are generally highly sensitive to landscape change (acknowledging that there will be localised areas where sensitivity may be lower) and cover some 97% of the District.
- 4.3 The notified RVZ provisions and their locations on the plan maps allow for a very limited extent (or 'footprint', albeit fragmented) of visitor accommodation and commercial recreational activity development within the District's ONLs. I am advised that of the approximately 902,819 ha of the District that is identified as ONL, only 260.2 ha was notified as RVZ under the PDP Stage 3B. This amounts to RVZ (as notified) throughout 0.03% (approximately) of the District's ONLs.
- 4.4 Further, and from a landscape perspective, for those parts of the notified RVZ areas with a landscape sensitivity rating of 'Moderate' or less, the provisions are relatively 'enabling' (for example a Controlled activity status for buildings with no site coverage limit), in recognition of the very limited portion of the ONLs of the District to which they apply.
- 4.5 I am also advised that, generally, there has been very little pressure for development within the notified RVZs to date.
- 4.6 The notified version of the RVZ was informed by the location of the ODP RV zones, as well as a range of technical reports, including a landscape assessment prepared by Ms Mellsop (the **Mellsop Report**). The scope of the Mellsop Report is reproduced below:

"...to provide a landscape assessment of existing ODP RV zones, with a specific focus on the capacity of the zones to absorb visitor facility

2 I am advised that there is a group of submissions requesting the RVZ be applied beyond ONL areas.

development while protecting or maintaining the values of the rural landscapes in which they sit. The assessment includes the following components:

- *A high level appraisal of whether the ODP RV Zone provisions are appropriate from a landscape perspective;*
- *Description of the attributes and character of the wider receiving landscape for each RV Zone, followed by evaluation of the landscape values and landscape categorisation in terms of the QLDC Stage 1 Decisions Version PDP categories;*
- *Description of the attributes and character of the ODP RV Zone area and any proposed or potential extensions to the zone area;*
- *Evaluation of the landscape and visual sensitivity and absorption capacity of the wider receiving landscape and of the RV Zone area;*
- *Recommendations on whether visitor facility development could be appropriate subject to controls (eg. building height, coverage, landscaping) and where this development would be appropriate.”³*

4.7 The Mellsop Report included mapping of the landscape sensitivity of each of the ODP RVZ areas that was informed by a detailed landscape assessment of each RVZ site and its location.

4.8 The notified RVZ provisions recognise the varying landscape sensitivities (identified in the Mellsop Report) across the proposed RVZ areas. Buildings have controlled status where landscape sensitivity (defined at 4.11 below) is rated as ‘moderate’ or below, discretionary status for buildings in mapped RVZ areas of “Moderate – High” landscape sensitivity, with buildings having a non-complying activity status in areas of “High” landscape sensitivity.

4.9 I note that the notified RVZ provisions include a series of development standards for controlled activities addressing matters which are of

3 QLDC Rural Visitor Zone Review Landscape Assessment, prepared by Helen Mellsop Landscape Architect, dated May 2019: Section 1.3, page 2.

relevance to the management of landscape effects: building height (6m height limit⁴); building size (500m²); glare controls, waterbody setbacks (20m)⁵; building setbacks (10m from zone boundary).⁶ There are however no controls in relation to site coverage or building appearance.

4.10 I understand Ms Emily Grace (the s42 A author), has recommended a 500m² building coverage limit be applied to RVZ areas where a controlled activity status is considered to be appropriate (i.e. areas where the landscape sensitivity is rated as 'moderate' or lower). Ms Grace also recommends the inclusion of a Building Materials and Colours standard for such buildings.

4.11 My evidence explains that I consider each of the rezoning sites that I have assessed to have a landscape sensitivity that rates towards the moderate-higher end of the spectrum, making a controlled activity status unlikely to be appropriate on these sites. For this reason, I have not considered the merits of Ms Grace's proposed building coverage control further.

4.12 I also note that the Topic 2.2 decision⁷, the Mellsop Report⁸ and the Council's landscape evidence⁹ for Stage 3B RVZ use two slightly different but interrelated terms in the discussion of landscape effects:

- (a) the capacity (sometimes referred to as 'capability') of the landscape to absorb change; and
- (b) landscape sensitivity.

4 Excepting the Water transport Overlay where buildings shall be 4m.

5 Setback does not apply to Walter Peak Water Transport Infrastructure.

6 Setback does not apply to Walter Peak Water Transport Infrastructure.

7 Which talks about 'landscape capacity', for example see [2019] NZEnvC 205, paragraph [225].

8 Which talks about 'landscape sensitivity'.

9 For example, see Ms Mellsop's evidence in chief which mentions 'landscape sensitivity' in the discussion of submissions in relation to Arthurs Point (paragraphs 7.1, 7.3, 7.5) and 'capacity to absorb development' in the discussion of the Morven Ferry rezoning request (paragraph 8.5).

- 4.13 To assist the Panel, I set out the definition of these terms from the NZILA Best Practice Note¹⁰:

***Landscape capacity** is the amount of change that a landscape can accommodate without substantially altering or compromising its existing character or values.*

***Landscape sensitivity** is the degree to which the character and values of a particular landscape are susceptible to the scale of external change.*

- 4.14 I confirm that I have applied these definitions in the preparation of my evidence. Importantly, my comments in relation to 'landscape sensitivity' and 'landscape capacity' for each of the submission sites assume the development anticipated by the notified RVZ provisions.

5. EVIDENCE APPROACH

- 5.1 Time constraints and the broad nature of the information in submissions has not permitted a detailed landscape assessment of the Loch Linnhe Station and Lake Hāwea Holiday Park sites in the manner undertaken by Ms Mellsop for the sites considered in her evidence. Rather my evaluation is effectively 'high level', and addresses the following:

- (a) A brief description of the existing landscape character of the area(s) proposed for rezoning.
- (b) Commentary as to whether, from a landscape perspective, there is a reasonable 'fit' for the RVZ in each of these locations with a brief explanation of the factors that weigh in favour of the opinion expressed.
- (c) Identification of the key potential landscape opportunities and constraints associated with the area(s) proposed for rezoning as RVZ. In general, identified landscape constraints are likely to have the potential to detract from landscape values, and the identified landscape opportunities have the potential to enhance landscape values. Typically appropriate RVZ

development will integrate the identified landscape opportunities and avoid or mitigate the identified landscape constraints. This section includes commentary as to the potentially appropriate planning regime for the RVZ on each submission site from a landscape perspective.

(d) Bearing in mind the preceding analysis, my expert opinion with respect to detailed landscape analysis required:

(i) to secure confidence that the RVZ will be appropriate in each location (or part thereof); and

(ii) to potentially guide any location specific provisions that would be beneficial from a landscape perspective.

5.2 Key factors that have guided my determination of whether there is a fundamental 'fit' for RVZ (from a landscape perspective) include the following:

(a) Whether the site is located within an ONL and has a remote character (acknowledging that Ms Grace, has advised that there is some tolerance for the RVZ to be applied to land outside ONLs).

(b) Whether the site is relatively visually discrete in views from public places and neighbouring dwellings (by virtue of existing landform and/or vegetation patterns).

(c) Whether the site or immediate context displays a modified character.

(d) Taking into consideration existing and likely future development on the site and within the immediate area, whether additional development of the type anticipated by proposed RVZ will generate adverse cumulative effects to a point where landscape values are not protected.

(e) Whether there are reasonably 'buildable' locations within the proposed rezoning area. Factors that contribute to this consideration include a relatively easy contour (thereby minimising earthworks effects), ease of access, reasonable sunlight access, quality views, and the like.

6. LOCH LINNHE STATION (31013)

6.1 The Loch Linnhe submission relates to a large pastoral leasehold station over 3,700ha in size located between Wye Creek and the Devil's Staircase on the eastern side of the southern portion of Lake Wakatipu. All of the station is located within an ONL (as is Lake Wakatipu in this location).

6.2 The submission seeks to rezone two discrete areas within the station from Rural to RVZ:

- (a) **Area 1** which is located to the south of the Wye Creek outwash fan between State Highway 6 (**SH 6**) and the lake (refer **Figure 1**); and
- (b) **Area 2** on an alluvial fan located approximately 14km south of Area 1 and 2km south of Staircase Creek to the east of SH 6. Area 2 encompasses the existing farm curtilage including two dwellings, a shearing shed, and various other farm buildings (refer **Figure 2**).



Figure 1: Area 1 depicted in orange outline.



Figure 2: Area 2 depicted in orange outline.



Figure 3: Approximate locations of Areas 1 and 2

6.3 The submission argues that the low landscape sensitivity of Areas 1 and 2 makes them well suited to being rezoned from Rural to RVZ. Although not expressly stated in the submission, it is my understanding that the submitter considers that a controlled activity status for RVZ related buildings is appropriate at Loch Linnhe subject to compliance with the various Peak development standards outlined above and site the following site specific controls:

- (a) A maximum built footprint of 1800m² at Area 1.

- (b) A maximum built footprint of 4700m² at Area 2.
- (c) A visibility standard for Area 1 that requires no buildings to be visible from the state highway.

6.4 The submission also cross-references to the PDP Stage 1 Loch Linnhe submission, legal submissions, evidence, s42A assessment and Panel Report in support of their RVZ rezoning request.¹¹ I confirm that I have read the aspects of this material insofar as it is relevant to landscape-related issues.

6.5 During our joint site visit on Tuesday 28 January 2020 to discuss Loch Linnhe's Topic 23 Rezoning appeal (in relation to the Farm Base Activity Area relief), Mr Ben Espie (landscape expert for Loch Linnhe) explained that since filing their RVZ submission, Loch Linnhe have thought more carefully about RVZ development within Area 2 and expect that it will take the form of 5 to 6 accommodation units with a communal facility, all located towards the southern end of Area 2, rather than the 'blanket' RVZ rezoning request outlined in the Loch Linnhe submission.

6.6 At the time of preparing this statement of evidence, no revised mapping (or provisions) have been received from the submitter in relation to Area 2.

Existing Landscape Character

6.7 Mr Espie provided landscape evidence for the Loch Linnhe Stage 1 submission. I have reproduced Mr Espie's description of the landscape in and around the areas proposed for rezoning below:

The entirety of Loch Linnhe Station (3766ha) is within the Rural General Zone (RGZ) and within the Outstanding Natural Landscape (ONL) as identified by both the Operative District Plan (ODP) and Proposed District Plan (PDP). The station generally takes in the west-facing slopes of the Hector Mountains that face the southern arm of Lake Wakatipu. These

¹¹ Noting that the extent of Area 2 addressed in the Stage 1 submission was slightly differently configured to that in their PDP Stage 3B RVZ rezoning request submission, with the latter comprising a more long and narrow area roughly confined to the elevated land south of the woolshed.

slopes are generally wild and rugged and are extensively grazed in the way that is common for high country stations of the district. They are broad and widely visually displayed to the west and have the sublime and majestic aesthetic qualities that are typical of the districts mountainous ONLs.

The vicinity of the northern requested FBA/RVZ at Wye Creek is part of a deposited fan landform associated with the mouth of Wye Creek. The northern half of this fan (i.e. north of Wye Creek itself) accommodates the existing Drift Bay rural living development that consists of 17 rural living lots. The southern half of this fan is within Loch Linnhe Station and is open, improved but undeveloped farm land. This area has accommodated a gravel pit associated with road formation and a woodlot in the past. A large clump of mature conifers marks the southeastern part of the requested FBA/RVZ area. Apart from these trees, the requested FBA/RVZ area is generally open and vegetated in pasture grass, although it has some rocky outcrops and a gully housing regenerating natives near its southern edge. In general terms, the part of the fan south of Wye Creek has the character of an area of improved pasture land set in a natural and dramatic location.

The vicinity of the requested FBA/RVZ at Loch Linnhe is the farm base and home paddocks area of the station. Again, it is part of a large fan landform associated with a number of creeks draining the upper reaches of the Hector Mountains. The part of this fan that takes in the requested FBA/RVZ accommodates the existing homestead and existing farm base buildings and activities (in the northern part of the requested FBA/RVZ) and smaller, fenced, improved home paddocks (in the southern part of the requested FBA/RVZ).

In an overall sense, the two relevant vicinities represent small areas of flatter improved paddocks within a vast, rugged, mountainous station; the southern of the two areas being particularly modified by farm base activities.

6.8 I generally agree with this landscape description, although would note the following attributes that I consider make an important contribution to shaping the landscape character of the areas proposed for rezoning:

- (a) The immediate and very strong spatial and visual connection of Area 1 to Lake Wakatipu and, more distantly, the western side of the lake.
- (b) The strong visual connection of Area 2 to Lake Wakatipu and the western side of the lake.
- (c) The potential visibility of parts of Area 1 in close-range views from SH 6 (given the unprotected status of the vegetation in the vicinity).
- (d) The screening of parts of Area 1 by unprotected vegetation and/or intervening vegetation in views from SH 6.
- (e) The visibility of parts of Area 2 in mid to long-range views from SH 6.
- (f) The screening of parts of Area 2 by unprotected vegetation and/or intervening vegetation in views from SH 6.

6.9 I do not agree that the proposed rezoning areas have a low sensitivity to landscape change.

6.10 In my opinion, the open character of much of Area 1 and Area 2 and its consequent visibility (at least in part) from the wider ONL context, including from SH 6 and Lake Wakatipu, renders a landscape sensitivity towards the mid to higher end of the spectrum with respect to rural visitor zoning in accordance with the notified provisions.

Is there a reasonable ‘fit’ for RVZ at Loch Linnhe from a landscape perspective?

6.11 As the submission currently stands, I do not support the RVZ rezoning relief sought by Loch Linnhe from a landscape perspective. My reasoning for this stems from the potential for adverse landscape effects identified in the Potential Landscape Constraints listed a paragraph 6.15 below.

- 6.12** However, in my opinion, and applying a 'high-level' landscape analysis, both Areas 1 and 2 have the ability to successfully absorb a modest level of rural visitor development subject to the implementation of some specific controls (i.e. RD or D status or a structure plan approach discussed shortly).
- 6.13** I note that this finding is in general accordance with Dr Marion Read's evidence¹² on behalf of Council for the Stage 1 Loch Linnhe submission and the Panel Report 17-9 regarding mapping of Wye Creek to Kingston.¹³
- 6.14** In my opinion, the attributes of the landscape that weigh in favour of this 'high-level' finding include:

Area 1

- (a) The ONL context of the site.
- (b) The distinctly remote character associated with Area 1.
- (c) The visually discrete nature of parts of Area 1 in views from the state highway as a consequence of intervening landform and/or (generally unprotected) vegetation patterns.
- (d) The extremely limited scope for additional development along this stretch of the highway corridor due to challenging topography.
- (e) The availability of areas of reasonably flat land that is devoid of native or noteworthy vegetation, with an established vehicular track (albeit overgrown in places), good sunlight access, and very high visual amenity values.

Area 2

- (a) The ONL context of the site.
- (b) The remote character associated with Area 2.

¹² For example, see M Read Landscape Evidence for Hearing Stream, 13 paragraph 12.49
¹³ QLDC Hearing Report 17-9, paragraphs 30 and 31

- (c) The limited visibility of the majority of Area 2 in views from the state highway as a consequence of intervening landform and/or (unprotected) vegetation patterns.
- (d) The established modified context of the area (homestead, farm buildings etc).
- (e) The availability of reasonably flat land that is devoid of native or noteworthy vegetation, with an established vehicular track, good sunlight access and very high visual amenity.

Key landscape opportunities and constraints

6.15 In my opinion, and within the context of consideration of rezoning requests for the RVZ, the key landscape opportunities and constraints associated with Area 1 and 2 can be summarised as follows:

POTENTIAL LANDSCAPE OPPORTUNITIES	
Area 1	Area 2
Landscape restoration and ongoing management of lake edge.	Retirement, landscape restoration and on-going management of gully areas and sloping land with locally appropriate indigenous species.
Ongoing removal of exotic species and replacement with locally appropriate indigenous species (including ongoing management).	Ongoing removal of exotic species and replacement with locally appropriate indigenous species (including ongoing management).
Integration of public access to lake edge and /or viewing point.	Use existing landform and vegetation patterns to integrate built development.
Use existing landform and vegetation patterning to integrate built development.	Use of existing access routes.
Use of existing access routes.	

POTENTIAL LANDSCAPE CONSTRAINTS

Area 1	Area 2
<p>Close and mid-range views from the eastern side of the lake of potentially quite intensive and/or inappropriately designed built development (assuming no external appearance controls apply and taking into consideration the proposed maximum built footprint of 1,800m²) that may detract from landscape values (sense of remoteness, naturalness and aesthetic values).</p>	<p>Mid and long-range views from the lake and western side of the lake (including a walking/ mountain biking route) of potentially quite intensive and/or inappropriately designed built development (assuming no external appearance controls apply and taking into consideration the proposed maximum built footprint of 4,700m²) that may detract from landscape values (sense of remoteness, naturalness and aesthetic values).</p>
<p>Longer-range views from the western side of the lake (including a walking/ mountain biking route) of potentially quite intensive and/or inappropriately designed built development (assuming no external appearance controls apply and taking into consideration the proposed maximum built footprint of 1,800m²) that may detract from landscape values (sense of remoteness, naturalness and aesthetic values).</p>	<p>Visibility from the highway of potentially quite intensive and/or inappropriately designed built development (assuming no external appearance controls apply and taking into consideration the proposed maximum built footprint of 4,700m²) that may detract from landscape values (sense of remoteness, naturalness and aesthetic values).</p>

6.16 In light of these identified landscape opportunities and constraints, I consider that a proposed RVZ within Areas 1 and 2 at Loch Linnhe is likely to be appropriate if additional landscape assessment is provided to support the submission and dependent on the outcome of that analysis, and also assuming:

- (a) A restricted discretionary or discretionary regime for buildings that would allow the Council to carefully control the number, extent and location of buildings (and associated infrastructure etc.) is imposed to ensure an appropriate landscape outcome.

- (b) A location-specific, structure plan approach is included in the PDP for Areas 1 and 2. This may take the form of identifying BRAs, building platforms, accessways (including public routes), vegetation features to be retained, and landscape restoration/ framework planting areas.
- (c) Some sort of 'blend' of these strategies that responds to the site-specific circumstances. An example of this approach might be to identify BRAs and existing vegetation to be protected on a location specific plan, with RVZ development outside of the BRA and vegetation features provided for as a restricted discretionary or discretionary activity.

6.17 From a landscape perspective, a structure plan type approach is preferred in this location due to the very high landscape values associated with the submission site and its context as evidenced by its identification as ONL. In my opinion, the specificity associated with a structure plan approach gives plan users certainty that the proposed rezoning will be appropriate from a landscape effects perspective. In particular, a well-crafted structure plan gives confidence that landscape values will be protected and that RVZ development will be reasonably difficult to see.

Detailed landscape analysis is required to justify RVZ with additional controls / standards

6.18 In my opinion, the submitter needs to provide the following detailed landscape analysis before the decision maker could be satisfied that RVZ is appropriate in this location and a decision made to allow the proposed RVZ rezoning request. I consider that this information will also be helpful in guiding the most appropriate 'mechanism' for applying the RVZ in these locations:

- (a) Scaled aerial photographs with detailed contour mapping of Areas 1 and 2 and their immediate context.
- (b) Confirmation of any refinements sought in relation to the extent of Area 2 (as per discussions on site with Mr Espie).

- (c) Contextual panoramic photographs from the lake of Area 1 and 2 with the extent of the proposed RVZ clearly identified on each photograph.
- (d) ZTV analysis for Area 1 and 2 (assuming no vegetation cover) that clearly illustrates the extent of visibility from the lake and state highway.
- (e) In accordance with the rationale of the Court set out in the Topic 2.2 decision and given that the site is located within an ONL, commentary with respect to the landscape values of the site and its setting.
- (f) Commentary as to how the proposed relief will protect those values (again, in accordance with the thinking set out in the Topic 2.2 decision).

7. LAKE HĀWEA HOLIDAY PARK (31043)

- 7.1** The Lake Hāwea Holiday Park submission relates to an approximately 17.07ha parcel of land located on the eastern side of SH 6 Makarora-Lake Hāwea Road, adjacent Lake Hāwea and to the northeast of Lake Hāwea township. The entire site is located within the ONL that stretches throughout the mountain landscape framing the western side of Lake Hāwea and out across the lake.

- 7.2** The area that is sought for rezoning to RVZ is depicted in **Figure 4** below. The site is currently zoned Rural and Community Purposes – Campground, with a designation (175) for Recreation Reserve (Motor Park) purposes over Section 2 Block II Lower Hawea SD, which is a Gazetted Recreation Reserve.

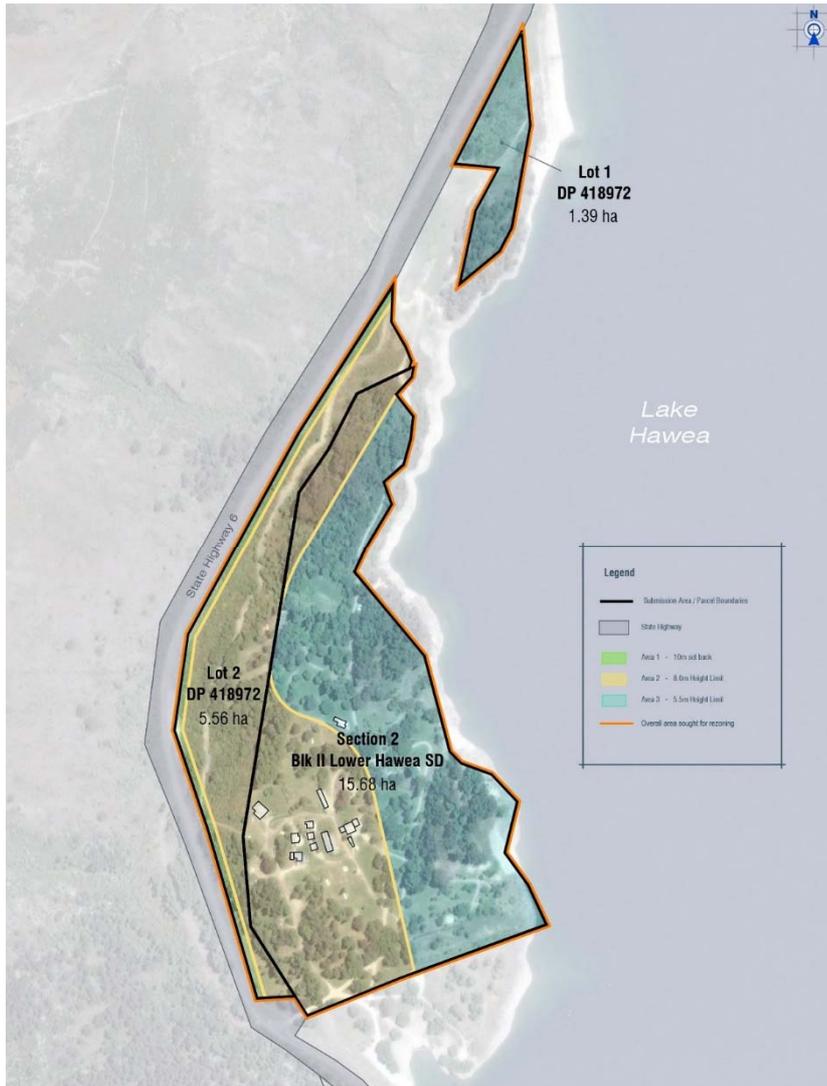


Figure 4: Lake Hawea Holiday Park RVZ rezoning submission area shown in orange outline.

- 7.1** The submitter proposes location-specific rules across the submission area *“that recognise [the] different characteristics of these sites by providing alternative height controls of 8 metres on the less sensitive land closer to the base of the hill and 5.5 metres on the more sensitive land closer to the lake”*.
- 7.2** No specific landscape evidence is provided in support of the Lake Hāwea Holiday Park submission on Stage 3 of the PDP.
- 7.3** There was, however, landscape evidence prepared by Mr Ben Espie (on behalf of the submitter) and Ms Mellsop (on behalf of Council) for the Hearing Stream 12 Upper Clutha Mapping Annotations and Rezoning Requests as part of Stage 1 of the PDP. That related to a

request for RVZ on the land in accordance with the ODP RVZ provisions, subject to a number of location-specific controls which included: a maximum total building coverage of 7%; variable building height controls across the submission site (consistent with the current RVZ rezoning request); a 20m building setback from the SH6 boundary; and a non-complying activity status for residential activity. I also note that the submitter explained at the hearing that it was their wish to establish up to eight geodesic domes at the holiday park.¹⁴

- 7.4** The RVZ provisions now sought to be applied to the Lake Hāwea Holiday Park (i.e. the Stage 3 notified RVZ provisions) provide for a minimum building setback of 10m from the zone boundary (which would correspond to the SH 6 boundary), and no building coverage limit.
- 7.5** I confirm that I have read the relevant PDP Stage 1 evidence together with the relevant Panel Report.

Existing Landscape Character

- 7.6** Ms Mellsop's evidence in chief for Hearing Stream 12 provides a helpful description of the submission land and its context, which I have reproduced below:

The land in question is Crown-owned reserve administered by QLDC (Hāwea Domain Reserve) and is currently leased to Glen Dene Holdings to operate a camping ground. QLDC holds a designation (number 175) for campground operations and facilities encompasses only part of the actual campground extent.

The site is located just north of the Lake Hāwea dam and outlet and is within 500 metres of Lake Hāwea Township. Development on the site includes camp amenities, buildings, and cabins in the centre, and parkland with lawns and mature trees running down to the lake edge. In the northern narrower part of the site are eucalypt and conifer plantings and some indigenous regeneration. There is a public boat launching ramp and

car park immediately south of the site, which is accessed via the camping ground entry.

The reserve is an alluvial terrace that forms a transitional area between Lake Hāwea and the schist mountains to the west, both ONLs. The site is too small to be considered a landscape by itself and is therefore classified as part of the larger ONL, albeit an area of this landscape has significant human modification.

7.7 Mr Espie describes the visual characteristics of the site:

In current views that are available from the above locations, the site currently appears as a heavily treed, relatively flat terrace or fan area in front of the steep, dramatic mountain slopes...

Within the site of the proposed RVZ, visitor accommodation activity is visually apparent and, at times of the year, very obvious...

... views from the relevant stretch of SH6 are very largely over the site to the lake beyond.¹⁵

7.8 I generally agree with these descriptions, although would note the following attributes that I consider make an important contribution to shaping the landscape character of the area proposed for rezoning:

- (a) The immediate and very strong spatial and visual connection of the submission site to the south end of Lake Hāwea, and very roughly, the portion of the lake southwards of a line roughly running between the northern end of the proposed RVZ (on the western side of the lake) and Bushy Creek (on the eastern side of the lake).
- (b) The visibility of the submission site in close-range views from SH6 and its current role as forming an informal green node of development as a consequence of its heavily treed, parkland character and its relatively low-key, modest and spacious built character.
- (c) The visibility of the submission site in mid and long-range views from: north-oriented dwellings within the Lake Hāwea

15 B Espie: PDP Stage 1 EIC on behalf of Sarah Burdon and Glen Dene Ltd, dated 4 April 2017, paragraphs 5.16 and 5.17.

township; the adjacent lake edge; the small lakeside cluster at Gladstone; the eastern lake edge extending northwards to approximately Bushy Creek, including the Te Araroa Trail and Gladstone Road; and walking tracks on the eastern side of the ranges that frame the eastern side of Hāwea (Grandview Ridge Track, Grandview Creek Track etc).

7.9 The submission does not comment on the landscape sensitivity of the site. However Mr Espie's evidence for Stage 1 advises that he considers that the site has a high capacity to absorb change due to its containment and level of modification.¹⁶

7.10 In light of the notified RVZ provisions, it is my opinion that the landscape sensitivity of the submission site rates towards the mid to higher end of the spectrum as a consequence of its visibility from Lake Hāwea, the lake edge, walking tracks and the state highway (at least in part) and the potential for RVZ development here to undermine the existing township edge.

Is there a reasonable 'fit' for RVZ at the Lake Hāwea Holiday Park from a landscape perspective?

7.11 As the submission currently 'stands', I do not support the RVZ rezoning relief sought by the Lake Hāwea Holiday Park from a landscape perspective. My reasoning for this stems from the potential for adverse landscape effects identified in the Potential Landscape Constraints listed at paragraph 7.17 below.

7.12 However, in my opinion, and applying a 'high-level' landscape analysis, the Lake Hāwea Holiday Park has the ability to successfully absorb a modest level of rural visitor development subject to the implementation of a range of controls.

16 Ibid, paragraph 6.1.

7.13 I note that Ms Mellsop and the Panel expressed tentative support for some form of RVZ on the holiday park site to recognise and provide for appropriate campground activities.¹⁷

7.14 In my opinion, the attributes of the landscape that weigh in favour of this 'high-level' finding include:

- (a) The ONL context of the site.
- (b) The visually discrete nature of parts of the submission site in views from the state highway, lake edge, lake, township, Gladstone and nearby walking tracks as a consequence of intervening landform and/or (generally unprotected) vegetation patterns.
- (c) The established modified context of the area (campground buildings etc).
- (d) The relatively discrete nature of the submission site, effectively forming an 'island' of lakefront that is bounded to the west by the state highway with the lake adjoining the north, east and southern edges. This configuration means that there is very limited risk of development change associated with RVZ on the submission site leading to pressure for 'development creep' further north along the western side of Lake Hāwea. It is, however, acknowledged that inappropriately scaled and located RVZ development on the submission site has the potential to read as an extension to the township, thereby contributing the impression of 'development creep' around this side of the lake (and into the ONL).
- (e) The availability of areas of reasonably flat land that is devoid of native or noteworthy vegetation, with established vehicular access, good sunlight access and very high visual amenity values.

17 For example, see Stage 1 PDP Hearing Report 16.6 Upper Clutha Planning Maps Lake Hāwea Campground, paragraph 51.

- 7.15** Due to its proximity to Hāwea township, the Lake Hāwea Holiday Park cannot be described as a 'remote' ONL location. It is, however, quite separate from the existing settlement by virtue of its location on the western side of the Hāwea River and apart from the existing urban area, together with its distinctly different parkland development character in comparison to the urban lakeside settlement.
- 7.16** So whilst not strictly a remote location, the holiday park site very much reads as a part of the wider (and generally remote) ONL context as opposed to part of the township.

Key landscape opportunities and constraints

- 7.17** In my opinion, and within the context of consideration of rezoning requests for the RVZ, the key landscape opportunities and constraints associated with the Lake Hāwea Holiday Park can be summarised as follows:

POTENTIAL LANDSCAPE OPPORTUNITIES

Landscape restoration and ongoing management of the lake edge.

Retention of noteworthy vegetation, ongoing removal of inappropriate species and replacement with locally appropriate indigenous and exotic species (including ongoing management).

Integration of public access to and along the lake edge.

Use of existing landform and vegetation patterning to integrate new built development.

Use of existing access routes.

POTENTIAL LANDSCAPE CONSTRAINTS

Close-range views from SH6 of two-storey and potentially quite intensive and/or inappropriately designed built development (assuming the 10m setback, no building coverage limit and no external appearance controls apply) that may detract from landscape values (naturalness and aesthetic values).

POTENTIAL LANDSCAPE CONSTRAINTS

Mid and longer-range views from the lake, lake edge, township, Gladstone and walking tracks in the area to potentially quite intensive and/or inappropriately designed built development (assuming the 10m setback, no building coverage limit and no external appearance controls apply) that may detract from landscape values (naturalness and aesthetic values).

Loss of the perception of the area as a very low-key green node of development as a consequence of potentially quite intensive and/or inappropriately designed built development (assuming the 10m setback, no building coverage limit and no external appearance controls apply). This change in landscape character has the potential to undermine the integrity of a defensible urban edge around the western side of the Hāwea township and contribute the perception of development creep northwards along the western side of the lake that may detract from landscape values (naturalness, aesthetic values and shared and recognised values).

- 7.18** In light of these identified landscape opportunities and constraints, I consider that a proposed RVZ at the Lake Hāwea Holiday Park is likely to be appropriate if additional landscape assessment is provided to support the submission, and dependent on the outcome of that analysis, and also assuming:
- (a) A restricted discretionary or discretionary regime for buildings that would allow the Council to carefully control the number and location of buildings (and associated infrastructure etc.) is imposed to ensure an appropriate landscape outcome.
 - (b) A location-specific, structure plan approach is adopted. This may take the form of identifying BRAs, building platforms, accessways (including public routes), vegetation features to be retained and managed and/or protected, and landscape restoration/framework planting areas in addition to location specific development controls in relation to the external appearance of buildings.
 - (c) Some sort of 'blend' of these strategies that responds to the site-specific circumstances. An example of this approach might be to identify BRAs and existing vegetation to be protected on a location specific plan, with RVZ development

outside of the BRA and vegetation features provided for as a restricted discretionary or discretionary activity.

- 7.19** From a landscape perspective, a structure plan approach is preferred in this location due to the very high landscape values associated with the submission site and its context as evidenced by its identification as ONL. In my opinion, the specificity associated with a structure plan approach gives plan users certainty that the proposed rezoning will be appropriate from a landscape effects perspective. In particular, a well-crafted structure plan gives confidence that landscape values will be protected and that RVZ development will be reasonably difficult to see.

Detailed landscape analysis is required to support a RV Zone with additional controls

- 7.20** In my opinion, the following detailed landscape analysis is required to justify a proposed RVZ in this location. I consider that this information will also be helpful in guiding the most appropriate 'mechanism' for applying the RVZ at the Lake Hāwea Holiday Park:
- (a) Scaled aerial photographs with detailed contour mapping of the submission site and its immediate context.
 - (b) ZTV analysis for the submission site, assuming the proposed building height controls apply (and assuming no vegetation cover), that clearly illustrates the extent of visibility from SH6, the lake and lake edge, Hāwea township, Gladstone, and the walking tracks in the vicinity.
 - (c) In accordance with the thinking of the Court set out in the Topic 2.2 decision and given that the site is located within an ONL, commentary with respect to the landscape values of the site and its setting. Commentary as to how the proposed

relief will protect those values (again, in accordance with the thinking set out in the Topic 2.2 decision).

A handwritten signature in black ink that reads "Bridget Gilbert". The script is cursive and somewhat informal.

Bridget Gilbert

18 March 2020