

**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 re-notified Stage 1  
submissions: Gertrude's  
Saddlery Limited and  
Larchmont  
Developments Limited,  
at Arthurs Point

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**REPLY EVIDENCE OF HELEN JULIET MELLSOP  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**LANDSCAPE**

**24 March 2023**

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## 1. INTRODUCTION

1.1 My full name is Helen Juliet Mellsop. I prepared a statement of evidence in chief<sup>1</sup> (**EiC**) and a statement of rebuttal<sup>2</sup> in relation to the Arthurs Point renotification hearing, which concerned the rezoning relief sought by Gertrude's Saddlery Ltd (**Gertrudes Saddlery**) and by Larchmont Developments Ltd (**Larchmont**).<sup>3</sup> My qualifications and experience are set out at section 1 of my EiC.

1.2 I attended the hearing on the morning of 1 February 2023 and have listened to the recording of the landscape evidence presented by Mr Ben Espie, Ms Yvonne Pfluger and Mr Stephen Brown over the following two days, as well as the associated questioning of these witnesses by the Hearing Panel. I have also read the Memorandum of Counsel enclosing the submitters' reply information (dated 16 February 2023), including the updated structure plan. I understand no changes of substance have been made to the structure plan in that reply information.

1.3 This reply evidence addresses the following issues:

- (a) ONL and ONF boundaries; and
- (b) Amended LLRB structure plan and bespoke provisions.

## 2. ONL AND ONF BOUNDARIES

2.1 Both Ms Hill and Mr Espie suggested my recommended ONL boundary is artificial because it aligns with the submitters' revised LDSR boundary. Both misrepresented my evidence. My recommended ONL boundary is shown as the pink dashed line in Figure 1 in my Rebuttal Evidence. In paragraph 3.3 of my Rebuttal Evidence, I say "For the reasons set out in my primary evidence, I could support the revised extent of LDRZ sought by the submitters from a landscape perspective". This is because the LDSR extension sought by the submitter is smaller than the area I said in my EiC that I could support. However, nowhere in my rebuttal evidence have I said that the ONL

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1 Dated 18 October 2022.

2 Dated 20 December 2022.

3 Submissions #494 and #527.

boundary should subsequently align with that slightly smaller area of LDSR.

- 2.2** In her legal submissions, Ms Hill made reference to the Bridesdale Farm appeal to Stage 1 of the PDP, where the northern boundary of the Kawarau River ONF was also the boundary of a wider ONL including the northern Remarkables. I was the landscape expert for QLDC in that appeal, and can confirm that all landscape experts involved agreed that the Kawarau was nested within a wider ONL, and that the ONL and river ONF had the same northern boundary in the vicinity of the appeal land.
- 2.3** In my view, the same situation also applies to parts of the Kimiākau Shotover River ONF boundaries in proximity to Arthurs Point – that is, the Arthurs Point side of the Shotover River ONF boundary is also the boundary of the wider ONL (which includes parts of the Central Whakatipu Basin and Western Whakatipu Basin Priority Areas).
- 2.4** Where the ONF adjoins the current UGB of Arthurs Point, it is also the boundary of the wider ONL the river is nested within. Ms Pfluger confirmed her agreement with this point in answer to questions from the Panel. I consider that the Shotover River ONF is in general surrounded by and an integral part of the wider ONL.
- 2.5** In the notified Stage 1 PDP, the landscape of the wider Arthurs Point basin was classified as ONL, without any separate identification of the Shotover River ONF. While the Shotover River ONF was mapped separately from the ONL as part of the Priority Area identification, this does not in my view mean that it is separated from the wider ONL it passes through. Separation would be contrary to the way the landscape is appreciated and perceived by people.
- 2.6** I also emphasise my answer to a question from the Panel that the boundary of the Shotover River ONF where it passes the submission site, was not specifically evaluated or assessed as part of the expert conferencing which resulted in the 29 October 2020 joint witness statement. Rather, the version of the urban / rural boundary, as it

existed at that point in time, was included in the mapping – and at that time it was around the outside of the submission site.

**2.7** Ms Hill stated that the ONL boundary I have recommended extends over the crest of the knoll. A careful examination of the underlying contours of the site (refer Figure 1 in my Rebuttal Evidence) will show that the ONL boundary I have recommended (refer pink dashed line) only excludes land on the northern side of the knoll from the ONL and runs from the highest eastern point of the knoll westward to the northern side of the lower western high point, taking in hummocky flatter land to the north and north-west of these two high points. The oblique aerial attached to Ms Hill's legal submissions is not a view experienced by people within the landscape and is not helpful in understanding the proposed ONL and zoning boundaries. The visual simulations from representative viewpoints produced by Boffa Miskell are of more assistance in this regard.

### **3. AMENDED LLRB STRUCTURE PLAN AND BESPOKE PROVISIONS**

**3.1** Through Ms Hill's legal and Mr Jeff Brown's summary of evidence presented at the hearing, (and in relation to the planning provisions only the post-hearing memorandum from the submitters' Counsel), the proposed LLRB structure plan and bespoke planning provisions have been revised in response to Council and further submitter evidence, and Panel comments during the hearing. The changes include:

- (a) Relocation of some building platforms to ensure that setbacks from internal boundaries and from the adjacent DOC reserve are at least 6 metres;
- (b) Requirement for 30% of planting to achieve a height of 2 metres prior to any building construction; and
- (c) A revised policy framework in relation to landscape objectives, public cycle and walkway access, maintenance/replacement of revegetation planting and subdivision rules.

**3.2** Taking into consideration these changes to the proposal, I remain of the opinion that the bespoke LLRB zone, structure plan and associated

controlled activity subdivision is not appropriate from a landscape perspective.

- 3.3** The width of revegetation planting between future dwellings and the site boundary/DOC reserve would be increased for some platforms, and the time to achieve integration/softening (but not screening) of buildings by planting would be reduced. The revised proposed would still, however, result in an extension of urban development over the southern and south-western sides of the knoll into the ONL and into the Shotover River corridor.
- 3.4** My recommendation was for a minimum lot size of 4000m<sup>2</sup> rather than 2000m<sup>2</sup> in the bespoke LLRB if the Hearing Panel was minded to recommend approval. To clarify, this would involve a revised bespoke structure plan that also still identified BRAs, roads, trail links and structural planting – yet that complied with a 4000m<sup>2</sup> minimum lot size.



**Helen Juliet Mellsop**

**24 March 2023**