

**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 the Rezoning Hearing
Stream 12 – (Upper
Clutha mapping)

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

LANDSCAPE

10 JULY 2017

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1. INTRODUCTION

- 1.1** My full name is Marion Read. I prepared a statement of evidence in chief and rebuttal evidence on landscape issues at Makarora Valley, and Parkins and Glendhu Bay, for the Upper Clutha Hearing Stream 12. My qualifications and experience are detailed in my original statement of evidence dated 17 March 2017.
- 1.2** The purpose of this reply evidence is to specifically respond to matters raised by Ms Yvonne Pfluger and Mr Christopher Ferguson, on behalf of Glendhu Bay Trustees Ltd in their supplementary evidence filed during the course of the hearing. I note I have also read relevant parts of Counsel for Glendhu Bay Trustees Ltd's legal submissions for a full understanding of the revised relief now being pursued by the submitter.
- 1.3** Although this is just 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** All references to the Proposed District Plan (**PDP**) provision numbers are to the Council's Reply version of those provisions, unless otherwise stated.

2. EVIDENCE OF MS PFLUGER FOR GLENDHU BAY TRUSTEES LTD (583)

- 2.1** Ms Pfluger details, in her supplementary evidence, the processes that have been used to determine the location of future dwellings within the eight additional homesites that Glendhu Bay Trustees are requesting. This has resulted in modifications to the proposed locations of some of them (from those originally proposed in the Resource Consent application and declined by Council). Her evidence includes a computer generated Zone of Theoretical Visibility (**ZTV**) Analysis, which shows that none of the future dwellings within

the proposed zone would be visible from outside of the site once mitigating vegetation reached 2m in height.

- 2.2** It is not, in my understanding, usual to include vegetation in a ZTV analysis. The 'Guidelines for Landscape and Visual Impact Assessment',¹ which has been promoted by the NZILA as a best practice guide for landscape and visual assessments states that ZTV:²

...makes clear that the area so defined only shows land from which the proposal may theoretically be visible. That is, it treats the world as 'bare earth' and does not take account of potential screening by vegetation or buildings.

- 2.3** Adherence to this principle means that a clear standard can be used whether the ZTV is part of a design process or part of an assessment of effects for consent. Vegetation within the area under consideration may or may not be present; may or may not have any sort of protection; and, in the case of proposed mitigation planting, may take variable lengths of time to grow and have effect. It is considered better practice to identify actual visibility (as opposed to theoretical visibility) by site survey.³ A consequence of including the vegetation in this case is that it makes it unclear what the contribution of planting to the minimisation of visibility actually is. It is clear in my view, however, that it represents the long term situation for the development and does not identify whether or not this level of mitigation can be anticipated in a reasonable time frame.

- 2.4** The assessment of visibility and, indeed, the alterations to the locations of some of the building sites, have all been based on the footprints of the consented dwellings. Should the zone be enabled these footprints will become redundant as each lot owner will be able to design their own dwelling (under a new consent). It is unclear to me exactly how the locations of these future dwellings will be determined as no building platforms, other than these footprints, are

1 Landscape Institute and Institute of Environmental Management & Assessment. (2013). "Guidelines for Landscape and Visual Impact Assessment". Routledge: London.
2 P 103 Para 6.8.
3 P 103 para 6.10.

identified⁴ or have been assessed. It appears that the intention is that future dwellings must be located within the defined curtilage areas that are identified as Homesites on the proposed structure plan, attached to Mr Ferguson's supplementary evidence. The potential visibility of a unique dwelling within each curtilage area, albeit one that complies with all proposed height and design controls, has not been assessed. To do so would have required the assessment of a building at the proposed height limit at the full extent of possible locations, that is, at the margins of the curtilage areas. Further, I note that the proposed rules (44.6.7(b)) limit curtilage areas to 1000m² but that the eight identified by Ms Pfluger are all 1200m² in area.

2.5 The assessment undertaken by Ms Pfluger has been based on 3.8m as the maximum building height. The proposed rules limit building height to 4m. I accept that 'such a small change would be visually, barely discernible⁵ if one were comparing the same building at height A and height A plus 20cm. It is entirely possible, however, that an additional 20cms (if that is actually the increase – see below) on each of forty two, or fifty, dwellings may make the difference between them being, collectively, barely noticeable and the entire number of them being visible, altering the landscape and visual amenity gained from the site significantly.

3. EVIDENCE OF MR FERGUSON FOR GLENDHU BAY TRUSTEES LTD (583)

3.1 Mr Ferguson, at paragraph 33 of his evidence, discusses the heights of the consented and proposed dwellings. He has appended an elevation of the consented dwelling design, which he explains was missed from the stamped approved plans. This shows a building with a roofline at 3.35m above RL. It also has a chimney that is 4.15m high. The height which he and Ms Pfluger use as the height of the building (3.75m) is the height of the building plus the vegetation planted on its roof. The function of the vegetated roof is to assist the dwelling to blend into its context. In my opinion there is a distinct difference in appearance between a solid roofline and a vegetated

4 I note that Ms Baker-Galloway refers to 1000m² building platforms in her submissions at paragraph 5. These do not appear to have been either assessed, nor sought by the applicant.

5 Pfluger, Y. Supplementary evidence, Para 9, P 3.

one and to claim this height as the height of the dwelling is a misrepresentation. Consequently the actual increase in the proposed height plane above that of the dwellings consented is 0.65m.

3.2 Further, should the new special zone be adopted, the chimneys of dwellings may protrude 1.5m above the roof line resulting in the maximum height of 5.5m. This compares with a height to the top of the chimneys for the consented dwellings of 4.15m, and is an increase of 1.35m over that consented. I consider these to be significant changes that could result in significant adverse effects on the landscape quality and the visual amenity the location provides. The fundamental point I wish to make is that the proposed regime has not been adequately assessed to determine whether or not this is the case.

3.3 Mr Ferguson has also included a Revised Glendhu Station Zone chapter at his Appendix 1, which is intended to elevate the importance of the landscape and landscape context of the zone. This includes proposed assessment matters for dwellings at 44.8. I consider that these assessment matters would assist in ensuring that any buildings proposed under 44.5.2(c) was appropriately recessive in appearance. In addition he has provided alternate structure plans (see Appendix 2 and Appendix 3 to Mr Ferguson's supplementary evidence), which would result in the majority of the wider site (the Glendhu Bay Station) zoned Rural. While on a general level I consider these amendments to be positive I will leave it to Mr Barr to examine the planning options and alternatives in detail.



Marion Read
10 July 2017