
**SUBMISSION ON A PUBLICLY NOTIFIED
PROPOSAL FOR POLICY STATEMENT OR PLAN
(FORM 5)**

To: Queenstown Lakes District Council ('QLDC' or 'Council')
Private Bag 50072
Queenstown 9348

Submitter: Arthurs Point Outstanding Natural Landscape Society Incorporated ('Submitter' or 'Society')

Introduction:

1. The Arthurs Point Outstanding Natural Landscape Society was incorporated to protect the internationally recognised outstanding natural landscape, outstanding natural features and amenity that the members of the Society enjoy as residents of Arthurs Point. The Society's members are concerned that, if unchecked, insensitive development in Arthurs Point will not only ruin the outstanding natural landscape and compromise the Shotover River (as an outstanding natural feature) but will severely compound the problems we already see with our over-stretched local transport network and infrastructure.
2. The purposes of the Arthurs Point Outstanding Natural Landscape Society are to:
 - a. Pursue and protect the landscape values generally and in particular within the vicinity of the Wakatipu Basin and address matters arising as a consequence of the Resource Management Act 1991 and all matters incidental thereto;
 - b. Do anything necessary or helpful to the above purposes.
3. The Variation introduces proposed landscape schedules 21.22 and 21.23 to Chapter 21 (Rural Zone) of the Proposed Queenstown Lakes District Plan ('PDP') which were notified on 30 June 2022. As set out in Part 1 of the section 32 report, the purpose of the variation is to implement Policy 3.3.42 of the PDP, which is as follows:

3.3.42 The Council shall notify a proposed plan change to the District Plan by 30 June 2022 to implement SPs 3.3.36, 3.3.37, 3.3.39 and 3.3.40.
4. Policy SP 3.3.36 identifies twenty-four Priority Area landscapes within Outstanding Natural Features ('ONF') and Outstanding Natural Landscapes ('ONL'), which notably include the ONF of the "Shotover River", the ONL of the "West Wakatipu Basin", and the ONL of the "Central Wakatipu Basin Coronet".
5. Policy SP 3.3.37 requires, for each of these twenty-four Priority Areas, a schedule to describe:
 - a. The landscape attributes (physical, sensory and associative);
 - b. The landscape values; and
 - c. The related landscape capacity.
6. Policy SP 3.3.46 directs that:

"The Landscape Assessment Methodology required by SP 3.3.45 is to be implemented when assessing:

- a. *proposed plan change affecting the rural environment;*
 - b. *a resource consent application for the subdivision, use or development of land where:*
 - i. *the application is for a restricted discretionary, discretionary or non-complying activity; and*
 - ii. *the proposal is in relation to land within an Outstanding Natural Feature or Outstanding Natural Landscape or gives rise to landscape effects and is on land with Rural zoning...*
7. The Society has an interest in the PDP as a whole, and as such, the submission relates to the PDP in its entirety.
 8. The particular interest of the Society is with respect to the ONL and ONF (Shotover River) at Arthurs Point, which is continuing to experience significant pressures from development both within it and on its fringes, including the Shotover Loop around Atley Road.
 9. The Society understands that the Priority Areas at Arthurs Point are part of both an ONL and ONF, and should therefore be addressed under Schedule 21.22.3 (Shotover River PA ONF), Schedule 21.22.12 (Western Wakatipu Basin PA ONL), and Schedule 21.22.15 (Central Wakatipu Basin Coronet PA ONL). This submission relates to these schedules, and any other schedules that relate to the subject matter pertaining to this submission, and ultimately seeks the protection of the values of both the ONL and ONF from inappropriate subdivision, use and development.
 10. The Society could not gain an advantage in trade competition through this submission.
 11. Enclosed is the submission made by the Society in response to the Council's request for public feedback on the values of the landscape priority areas (April 2022).

Submission:

12. The Society **supports** the inclusion of the landscape schedules in the PDP as a matter of priority and importance to the local and wider community.
13. As set out under section 6 of the Resource Management Act 1991 ('**RMA**'), in achieving the purpose of the Act:

“...all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

 - (a) *the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;*
 - (b) *the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development...*
14. As set out in the documentation enclosed, Arthurs Point had been subject to considerable and ongoing development pressure, and this is an ongoing issue that risks compromising the integrity of the ONL and ONF in this location.
15. The Society **supports** the conclusions of the Council's landscape and planning experts that there is no landscape capacity for urban expansions or urban development (including visitor

accommodation) in the pertinent Priority Areas and that the landforms enclosing the Shotover River (more commonly known as the Shotover Loop) are fundamental attributes of the ONF, as are its margins and adjoining ONL.

16. With regard to transport infrastructure, such as bridges or crossings of the Shotover River, the Society considers that there is no landscape capacity for such infrastructure to be established.

17. Broadly, the Society seeks:

- a. that the landscape schedules that relate to Arthurs Point and its surroundings are included in the PDP, to implement Policy 3.3.42;
- b. the values of the ONL and ONF are appropriately recorded in the schedules so that those values can be considered in any future resource consent application or plan changes;
- c. that ultimately the ONL and ONF are protected from inappropriate subdivision, use, and development;
- d. the conclusion from the Council's landscape experts is that the Shotover Loop ONF/ONL has no capacity for urban expansion is engrained into the PDP to prevent inappropriate subdivision, use and development within the ONL and ONF;
- e. any consequential amendments or refinements to the provisions of the PDP and/or landscape schedules to better achieve the purpose of sustainable management, and the protection of the ONL and ONF within and around Arthurs Point.

Reasons for the Submission:

18. As it stands at this point in time, the PDP is incomplete with regard to how it addresses ONFs and ONLs in the district. This has had and will continue to have significant adverse implications on how developments within and adjoining landscapes of national significance will be treated by decision makers, with a lack of community input into what values they wish to see protected at Arthurs Point.

19. The Society supports the reasons given in the Council's section 32 report and landscape schedules¹ provided with the notified Variation in reaching its conclusion that there is no capacity for urban expansion in the pertinent Priority Areas within and around Arthurs Point.

20. The Society also refers to the enclosed documentation for further support for the reasons for its Submission.

21. Granting the relief will:

- a. establish clear values within an ONL and ONF that need to be protected from inappropriate subdivision, use and development;
- b. provide an efficient framework for the assessment of resource consent applications and rezoning requests;
- c. meet the reasonably foreseeable needs of future generations;
- d. represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means; and
- e. promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the RMA and ultimately achieve its purpose.

Relief sought:

22. The Submitter requests the following decision:

¹ Schedule 21.22.3 (Shotover River PA ONF) and Schedule 21.22.12 (Western Whakatipu Basin PA ONL).

- a. that the landscape schedules and the conclusions on attributes, values and landscape capacity for the ONL and ONF at Arthurs Point be adopted and placed in the PDP;
- b. any other additional or consequential relief to the landscape schedules arising from evidence called by the Society in support of its submission;
- c. any other additional or consequential relief to the PDP, including but not limited to, the matters, issues, objectives, policies, rules, discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission, and the protection of ONLs and ONFs in Arthurs Point and throughout the district.

23. The Society wishes to be heard in support of its submission.

24. If others make similar submissions, the Society will consider presenting a joint case at any hearing.

Dated: 26 August 2022



Address for service:

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SUBMISSION ON A PUBLIC CONSULTATION

PROPOSED LANDSCAPE SCHEDULES

To: Queenstown Lakes District Council ('QLDC')
Private Bag 50072
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Submitter: **Arthurs Point Outstanding Natural Landscape Society Incorporated**
(‘Submitter’ or ‘APONLS’)

Introduction:

1. The Arthurs Point Outstanding Natural Landscape Society was incorporated to protect the internationally recognised outstanding natural landscape, outstanding natural features and amenity that the members of the Society enjoy as residents of Arthurs Point. The Society's members are concerned that, if unchecked, insensitive development in Arthurs Point will not only ruin the outstanding natural landscapes and compromise the Shotover River (as an outstanding natural feature) but will severely compound the problems we already see with our over-stretched local transport network and infrastructure.
2. The purposes of the Arthurs Point Outstanding Natural Landscape Society are to:
 - a. Pursue and protect the landscape values generally and in particular within the vicinity of the Wakatipu Basin and address matters arising as a consequence of the Resource Management Act 1991 and all matters incidental thereto;
 - b. Do anything necessary or helpful to the above purposes.
3. The Society has over 120 members, the majority of whom are residents or own property in Arthurs Point, and therefore, have an interest greater than the general public.
4. The ‘Landscape Schedules’ consultation was launched by QLDC around 10 March 2022 with the QLDC website stating the following objective :

“We're creating landscape schedules that set out the values of our district's landscapes. This includes priority landscapes and all of the Upper Clutha rural character landscapes (RCL).

A landscape schedule sets out the values of an area; the elements of a landscape which people care about most. These values could include how the landscape looks, the quality and quantity of its vegetation and wildlife, what your experience of being in the landscape is, the impact the landscape has on your sense of wellbeing, its historic or cultural significance, what it tells us about how it was created, and the recreational benefits we get from it.”

The QLDC website has an FAQ link that states how the schedules “...affect what I can do with my land in the future?”

“The inclusion of the schedules is not looking to change the provisions that set out what resource consent requirements exist for development within these rural areas.

The landscape schedules are intended to assist in assessment of a development proposal against the objectives and policies of the Proposed District Plan for the priority areas.”

Submission Areas:

5. This submission from APONLS relates to the following Outstanding Natural Feature (ONF) and Outstanding Natural Landscape (ONL) priority areas that surround Arthurs Point (also see Figure 1);
 - a. Shotover River Outstanding Natural Feature (ONF)
 - b. Queenstown Hill & Ferry Hill (ONF)
 - c. Central Wakatipu Basin Coronet Area Outstanding Natural Landscape (ONL)
 - d. West Wakatipu Basin (ONL)

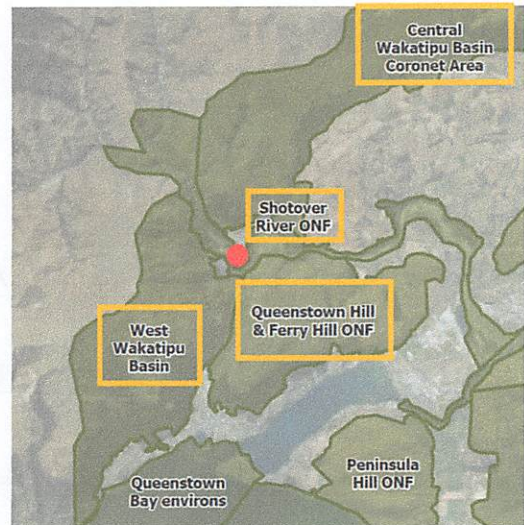


Figure 1- ONF's and ONL's at Arthurs Point

6. The submitter seeks to ensure that the landscape values of the Shotover River ONF, the Queenstown Hill ONF and wider ONL's the Arthurs Point settlement is nested within are appropriately described and the related landscape capacity of the area for development is rated as **very low**. This is to ensure the landscape values of the Shotover River ONF, the Queenstown & Ferry Hill ONF and wider ONL's surrounding Arthurs Point are appropriately protected from inappropriate subdivision development.
7. The Shotover River ONF requires protection from inappropriate development and there is development pressure for the expansion of residential subdivision and development into the slopes of the Shotover River ONF south of Arthurs point at the Shotover Loop and along the true left bank of the river.
8. The submitter considers that the landscape schedule for the Shotover River ONF should include a description of the low capacity for urban expansion and rural living developments into the margins of the Shotover River ONF and the wider Rural Zone ONL areas.

Fighting to Protect the ONL's and ONF's at Arthurs Point:

9. APONLS was formed because its members were concerned that the ONL Landscapes and ONF's at Arthurs Point which are matters of National Significance under RMA Section 6(B) were not being adequately and robustly protected by QLDC during the 2015 District Plan Change process.
10. The submitter was involved in a lengthy 3 year legal battle until 2021 with both QLDC and the Developers of a site that was recognised as being located within the notified mapping showing the ONL at Arthurs Point. In a bold move QLDC arranged to take land out of the ONL at Arthurs Point in an action that Judge Jackson stated in his C150/2019 Environment Court decision "may have been illegal". This case went as far as the Court of Appeal after successive Judges found against both QLDC and the Developers in the High Court and the Environment Court.
11. In Environment Court decision C150/2019 the Judge cancelled the QLDC decision to re-zone 111 and 163 Atley Road, Arthurs Point, to Low Density Residential, and re-instated the 2015 zoning as 'Rural', re-instate the notified 2015 ONL and Urban Growth boundaries. Due to this court order this land is zoned 'Rural' and is therefore part of the ONL.
12. Prior to the forming of APONLS and separate to the above legal action, the landmark Environment Court decision C180/1999 (Wakatipu Environment Society and others vs Queenstown Lakes District Council) established a number of principles that assist when considering landscape and visual matters. This legal battle was also over ONL and ONF land in Arthurs Point.

Landscape Schedules Consultation Process Incorrect Mapping:

13. The Landscape Schedules Consultation GIS mapping **incorrectly** shows the land that was subject of the Environment Court decision C150/2019 as not being part of an ONL. See Figure 2.
14. When cross checked against the current QLDC PDP GIS mapping it **incorrectly** shows the land that was subject of the Environment Court decision C150/2019 as having; a light brown hatch indicating its zoning is 'Lower Density Suburban Residential', surrounded with a dashed brown line indicating the ONL boundary, also surrounded by a dashed red line indicating the Urban growth boundary. See Figure 3. All these mapping features were ordered to be removed by the Environment Court in 2019.
15. The above QLDC mapping error is misleading and extremely confusing to APONLS members and other interested parties who know that the land has, by court order, now been zoned as 'Rural' and is ONL as shown on the notified 2015 plan Map 39a. See Figure 4.
16. On Thursday 10/3/22, just after the start of the Landscape Schedules Consultation, QLDC were informed of this mapping error by email. On 11/3/22 QLDC confirmed by email that they would pass this information 'on to the team'. As of 3/4/22 the GIS mapping error has not been corrected.

The Implications of the Overly Complicated Boundaries to Priority Areas at Arthurs Point:

17. The position of the boundaries to these priority areas forms a tight confluence in Arthurs Point which has created an unreasonably high degree of complexity, and maximised confusion for submitters who have struggled to correctly identify exactly where all these priority landscapes are located and what they should submit for each.
18. Within a small mapping area, in the vast scale and context of the districts landscapes the alpine village of Arthur's Point is uniquely situated within two ONL's, is split by an ONF the Shotover River, which lies beside another ONF Queenstown Hill.



Figure 2 - Screenshot from QLDC Landscape Schedules GIS Map. Taken 3/4/22. Red dot added to show the location of land subject to C150/2019 decision

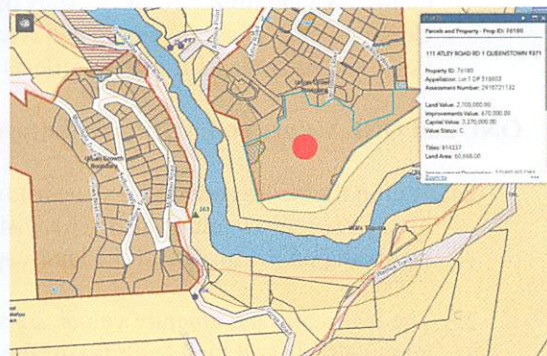


Figure 3 - Screenshot from QLDC PDP GIS Map. Taken 3/4/22. Red dot added to show the location of land subject to C150/2019 decision

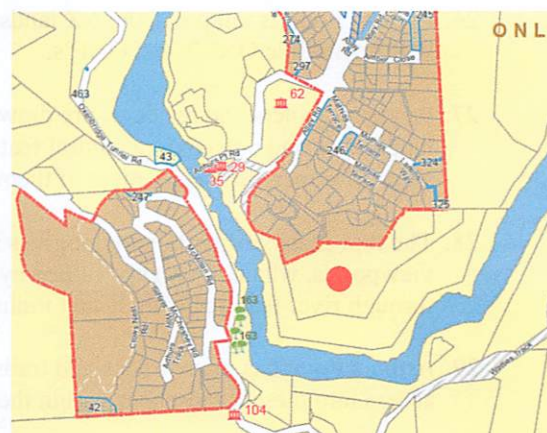


Figure 4 - Excerpt from 2015 QLDC Notified Map 39a. Red dot added to show the location of land subject to C150/2019 decision

19. The society is concerned that this unwarranted complexity, along with the mapping error mentioned above, has discouraged and turned-off many would-be reasonably informed submitters who, although engaged and concerned, are unable to follow the logic on why the landscape schedule priority areas have been split up the way they have, and have found this process challenging and overly complicated.
20. The feedback we have had back from APONLS members is that they would like to submit but simply do not know which ONL or ONF priority area they are submitting on.
21. This indicates that there is possibly a fault with the way the Landscape Schedules have been consulted, and, in areas like Arthurs Point where there is greater complexity due to a greater potential for development pressure, precisely because the ONL's and ONF's are matters of National Significance under RMA Section 6(B), QLDC must do more than try a 'one-size-fits-all' consultation process.

Wider Context of Arthurs Point Landform

22. At a broad scale, the landforms of the receiving environment comprise the Shotover River gorge and river terraces surrounded and contained by the mountain ranges of Ben Lomond, Mt Dewar and Queenstown Hill to the west, north and east respectively. To the south the landscape 'opens out' to the wider Wakatipu Basin approximately 6km away.
23. To the south of the Shotover River, Queenstown Hill dominates the southern outlook from the site at 911 masl, which although not as high as some of the surrounding mountains, is a distinctive and memorable landform. To the west, is the Ben Lomond range, and to the north Mt Dewar and Coronet Peak. These mountain and river gorge landforms physically and visually contain Arthurs Point and its settlement pattern reflects this.

ONL and ONF Values and Attributes Enjoyed by APONLS Members and Visitors at Arthurs Point

24. Within the wider context the Queenstown Lakes District's landscapes and natural environment are highly recognised and valued. The District relies in a large part for its social and economic wellbeing on the quality of the landscape, open spaces, and environmental image.
25. The landscape and amenity values are associated with the wider landscape setting where the massive scale and high legibility of the glacial and fluvial landforms convey a dramatic scenic quality. Generally, the landscape can be described as rural and enclosed by the surrounding mountains.
26. Arthurs Point is unique in the NZ landscape context as it the largest alpine village located situated within multiple ONL's and ONF's.
27. Property owners and residents are drawn here because of the recognised outstanding natural landscapes and outstanding natural features, along with the amenity and the ease of access, that allows for increased enjoyment of them.
28. The topography of Arthurs point gives it a sense of enclosure at a massive scale but there are many viewpoints, which are highly valued by residents and visitors alike, that afford views over and through river features with distant mountain backdrops that have very high scenic values.
29. Arthurs Point has many tracks and trails that enable walkers, hikers, bikers and climbers that allow access into these Landscapes within the local area.

30. Every year many, many thousands of people enjoy their visit or stay in the alpine village of Arthurs Point. People come from all over the world and all over New Zealand to enjoy the hospitality and activities that are offered here.
31. Many successful tourism businesses are based in Arthurs Point as they enjoy the advantage of selling a unique experience that is heightened because it is located within an ONF and/or and ONL.
32. Some activity/adventure based tourism businesses have clients that enjoy the following activities at Arthurs Point; Paddling or Rafting the river, Jet boating, Swinging across Canyons, Biking or Hiking along/down the tracks and trails, Climbing the hills and mountains, and, Skiing at Coronet Peak as the gateway is at Arthurs Point.
33. Other hospitality tourism businesses have clients that enjoy the following at Arthurs Point; Hotel, BnB and Lodge accommodation, Restaurants and Bars, Getting Married at a wedding venue, soaking in a hot pool, Special events.
34. People are drawn to the scenic beauty of this special area that is distinct and strongly memorable even for those driving through it for the first time.
35. The terrain and the geology are complex and have characteristics that are unique to this area. The formative processes of glacial movement and retreat over millennia have carved out the landforms in Arthurs Point in a process which is clearly legible and is regarded as a rare example which is outstanding in its own right.
36. The landscapes are highly dynamic and have high scenic value; rain in the upper river catchments distinctly raises and lowers the water level of the river with highly visible indicators of increased flow rates, Seasonal variation is reflected in the changing colours of the leaves on the poplars and pines forming a highly aesthetic backdrop, Low clouds and fog float at low level across the rivers, canyons and mountains giving an temporary sense of enclosure, Snow falls on the peaks of the surrounding hills/mountains for most of the winter and spring, The angle of the sunlight as it moves from behind ridgelines and arcs through the sky brings different features of the landscape into strong relief at different times of the year.
37. Exotic vegetation including poplars, conifers accentuate the alpine feel and scenic quality and have an extremely high aesthetic value especially when, as the seasons change, the leaf colours turn from green to gold. This blaze of colour is highly anticipated and appreciated by tourists and locals alike. Even without the trees the vista would expose the formative geological process that formed this outstanding landscape/feature.
38. Many parts of Arthurs Point are sufficiently removed from an urban setting and enjoy a peaceful quietness which is unusual given that the suburb is only 5minutes drive from the centre of Queenstown.
39. Some parts of Arthurs Point located outside the urban growth boundaries where members report enjoying an extremely dark night sky with virtually zero light spill from traffic and buildings within the urban growth boundary. Some of these areas, typically on the south side of the river, have a degree of enclosure allowing them to enjoy a sense of Wildness/remoteness.

Historical Features and Cultural Associations:

40. The maori name for the Shotover River is Kimi-ākau, which means looking for the coast, which is probably a reference to the area as a route to the West Coast in search of Pounamu.
41. The Shotover River has a rich history associated with gold mining. Gold was discovered in the river at Arthurs Point in 1862 which led to the establishment of Arthurs Point as a settlement. Over time the Shotover River has become one of the richest gold bearing rivers in the world and has been panned, cradled, sluiced, and dredged. Today people still look for gold along the river and its tributaries.
42. In 1917 the Edith Cavell Bridge was constructed to cross the Shotover River to improve In 1987 the bridge was listed with the New Zealand Historic Places Trust.
43. For over a century the ONL's and ONF's at Arthurs Point have been the subject of choice for many artists and photographers seeking to capture a snapshot of the aesthetic and scenic qualities that regard as culturally iconic and worth preserving and sharing with others.
44. A good example of this which is of particular iconic importance, is the view from Gorge Road and the properties accessed from Watties Track looking to the east with the gentle curves of the river in the foreground towards Big Beach up to Coronet Peak in the distance. Numerous paintings of this view have been produced by recognised New Zealand artists including Peter McIntyre. See Figure 5.



Figure 5 - Shotover River by Peter McIntyre



Figure 6 - NZ Post 1981 Scenery Series Shotover River 40c Stamp

45. In 1981 New Zealand Post produced a NZ Scenery Series of Stamps showing the same view of the Shotover River from the same vantage point. See Figure 6.

Landscape Description:

46. As a result of the proximity of Arthurs Point to the Queenstown town centre, and the pressure for urban expansions into the ONF and ONL, the rural environment surrounding Arthurs Point settlement requires a dedicated description of the landscape values and attributes of the Shotover River ONF and wider ONL.
47. The Shotover River ONF itself flows through the wider ONL at the head of its catchment and through the Wakatipu Basin and adjacent to the Queenstown urban environment near its confluence with the Kawarau River at the Shotover Delta.

48. The submitter consider that a nuanced approach to describing the values and landscape capacity of the Shotover River ONF in relation to identified areas of development pressure is necessary and appropriate. The same applies for the wider ONL which Arthurs Point is nested within.
49. A generic one-size-fits-all approach to describing the landscape values and landscape capacity of the Shotover River ONF and wider of the ONL mountains which frame the western extent of the Wakatipu Basin (i.e. Coronet/Mt Dewar) would not appropriately respond to the development pressure at Arthurs Point, and would not properly implement the values identification framework in Chapter 3 of the Proposed District Plan.
50. The APONLS request that a dedicated description of the landscape values and landscape capacity of the ONF and ONL around Arthurs Point is included in the schedules.

Landscape Assessment

51. The following text is requested to be included in the Proposed District Plan landscape schedules, and has been derived (and further modified by the APONLS) from the QLDC Read Landscapes – Landscape Boundaries Report April 2014:

Landscape Attributes (physical, sensory, associative)

The Arthurs Point area comprises a hard schist rock peninsula around which the Shotover River flows. The eastern facing mountain slopes of Bowen Peak to the west of the Shotover River, and the lower slopes of Mount Dewar to the east and to the north of the Shotover River.

The mountains and peninsula are schist and a platform to the north of the peninsula has been formed by glacial till which the river has eroded along the western side, creating a set of highly legible and distinctive river terraces. The topography of this area is complex, the river passing through a narrow gorge around the western end of the peninsula with steep cliffs dropping steeply to the Shotover River. Bluffs of 60 to 80m follow the river along much of its true left through this area.

It is a highly dynamic landscape illustrated by the river changing its level and flows, the strong seasonality including the autumn colours of the poplars, and the presence of snow on the surrounding peaks throughout winter and spring culminate in a landscape with distinct transient values and high scenic values.

Despite the presence of exotic trees such as poplars and the infestation of wilding conifers the Arthurs Point ONF and ONL have a moderately high natural character, and high aesthetic value. It is highly expressive of its glacial and fluvial origins.

Of particular importance in this landscape is the corridor of the Shotover River ONF. Its gorge around the peninsula and its corridor to the east is a spectacular landscape feature in its own right.

The remaining natural character and high scenic value of this feature is maintained. The integrity of the slopes of Mount Dewar is also important as they contain the development on the platform to the north of the river.

The Arthurs Point and Shotover River ONF have high cultural values to both Manawhenua and settler history associated with gold mining. The area has high recreational values associated with jet boating on the Shotover River and walking and cycling on the Lower Shotover Trail.

Landscape Capacity

The Arthurs Point settlement encompassing the existing urban environment and Lower Density Suburban Residential and High Density Residential Zones are located within and are part of the

Outstanding Natural Landscape. This is what provides the settlement with its character and amenity. The Shotover River ONF is highly sensitive to any subdivision and development, and earthworks including earthworks associated with farming activity or vegetation management.

The ONL around Arthurs Point is highly sensitive urban development expansions and further rural living development, particularly on the exposed faces of Mt Dewar.

Landscape Capability Rating to Absorb Additional Development

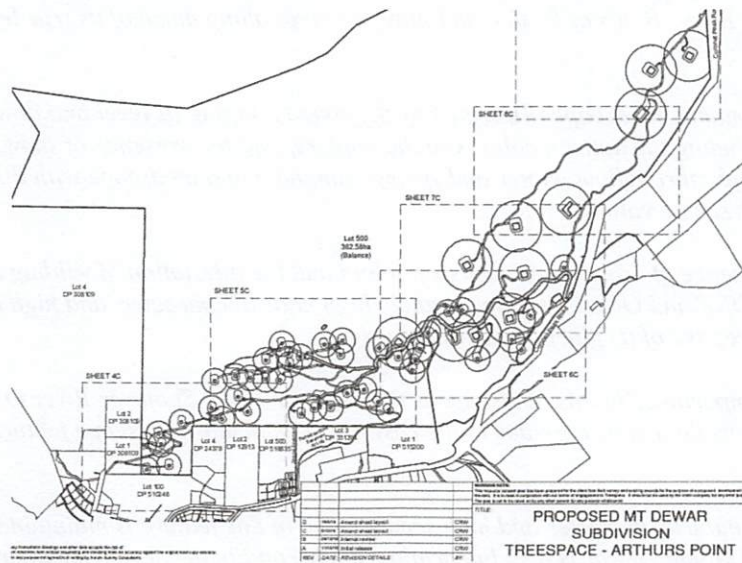
Very Low

Current Development Pressures:

- 52. These ONLs are under significant pressure from development. Notable consents recently authorised (or are lodged with the Council for approval) in or adjoining the ONLs include:
 - a. RM210768 (AP 155 Limited) to subdivide the property to create 55 residential allotments with 55 residential dwellings adjoining an ONL.



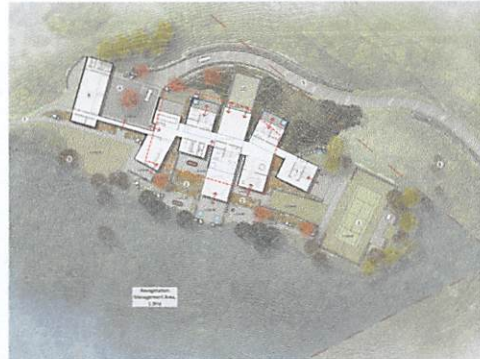
- b. RM181638 (Treespace Queenstown Ltd) to subdivide the site into 55 allotments and establish building platforms for 30 dwellings and a lodge within an ONL.



- c. RM210227 (Riverton Queenstown Ltd) to construct a 4 level apartment building with 24 residential units and 8 visitor accommodation units adjoining an ONL.



- d. RM201080 (S Li and X Zong) for the construction of a residential dwelling within an ONL.



- e. RM210220 (Royal Associates) for the construction of 35 visitor accommodation units within an ONL (in process).



- f. RM220018 (Sandalwood Holdings Ltd and Gertrude's Saddlery Ltd) for the clearance of vegetation to provide for the residential development of land within an ONL (in process).



53. These landscapes are under threat and cumulatively have reduced the landscape capacity further to a point where it cannot absorb further change as a result of inappropriate subdivision and development.

Dated: 3 April 2020

A handwritten signature in black ink, appearing to be 'A. P.', written over a horizontal line.

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