

**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 Resort Zone Hearing  
Stream 14 – Millbrook  
Zone

---

**STATEMENT OF REBUTTAL EVIDENCE OF ANDREW WILLIAM CRAIG ON BEHALF  
OF MILLBROOK COUNTRY CLUB LIMITED**

**LANDSCAPE**

---

**27 June 2018**

## INTRODUCTION

- 1 I have prepared this rebuttal evidence in response to landscape evidence, provided by the following submitters who seek Millbrook Resort Zone (MRZ) inclusion:

**#2513** Spruce Grove Trust 1124 Malaghans Road  
**#2512** Spruce Grove Trust 459 Arrowtown Lake Hayes Road  
**#2444** Boundary Trust 29 Butel Road

Landscape evidence prepared by Nicola Smetham<sup>1</sup>.

- 2 No other landscape evidence has been provided by the other submitters, namely **Underdown Trust (Griffin) #2580** and **Archibald #2501**, seeking inclusion within the MRZ. I understand that agreement is close to being reached between these submitters and MCC, resulting in, among other matters, some proposed amendments to the District Plan rules. My rebuttal will therefore focus on the landscape evidence prepared by Ms Nicola Smetham on behalf of Spruce Grove and Boundary Trusts.

**#2513 Spruce Grove Trust 1124 Malaghans Road**

**And**

**#2512 / 2444 Spruce Grove Trust / Boundary Trust 459 Arrowtown Lake Hayes Road and 29 Butel Road**

---

<sup>1</sup> The submitter numbers being those referenced by Ms Smetham in her evidence

- 3 In her landscape evidence Ms Smetham addresses both the Malaghans Road and Arrowtown / Lake Hayes Road sites simultaneously. This appears to be so the overarching principles she describes apply equally to both sites.
- 4 I agree with Ms Smetham that there is no significant landscape characteristic that potentially impedes inclusion into the MRZ of both sites. There are however, characteristics that would need to be taken account of in any development. For example, the upper slopes of the hill at the Malaghans Road site – the *rôches moutonnées* - would need to be free of buildings as this forms a significant backdrop as viewed from not only Malaghans Road, but also from within Millbrook including the publicly accessible Butel Road (otherwise known as 'The Avenue'). I note that Ms Smetham has not assessed views from these latter vantage points. Such a feature if it were included in the MRZ would very definitely be subject to a landscape protection (LP) overlay whose extent is determined by the views of it from all quarters. Regarding this particular feature, Ms Smetham also makes the observation<sup>2</sup> that it, in part, accommodates RAA 5. This part of the landform however is relatively much lower than that sought for inclusion by the submitter. Further, the landform incorporates exposed rock, which is absent from the RAA 5 development.
- 5 The structure plan proposed by the submitter (see Smetham evidence Appendix 7) would not achieve that outcome. Further, the structure plans would need to accord with the overall vision that MCC has for the MRZ. This is particularly important if new development is to be properly integrated with that existing within the MRZ.
- 6 In this regard Ms Smetham comments: *'I also note that because these sites are located on the periphery of the MRZ it is unlikely they will require a high level of integration into the existing golf resort facilities and operational controls.'*<sup>3</sup> I disagree. There is a suggestion here that there is scope for development within the submitter's land to stand apart from that existing within the MRZ.
- 7 In my opinion, design coherence is crucial to the character and amenity of Millbrook. People would understand that the MRZ reads as a single entity where all activity is well integrated and of a very high standard. The term 'resort' also

---

<sup>2</sup> Paragraph 58

<sup>3</sup> Paragraph 84

has popular connotation. In a wider sense it is a particular destination whose purpose is to provide rest and recreation. It can apply to an entire area – Queenstown is a resort town, for example. Equally it can be a corporate resort such as Millbrook or Club Med, whose sole foundation is premised on a very particular form of rest and recreation. In other words, such resorts are brands, based on a particular corporate vision. This finds expression in the environment or landscape of the resort. It is my opinion that this brand or vision, as outwardly expressed in Millbrook landscape, needs to be consistent throughout the MRZ in order to maintain and enhance the original vision of the founders so as to give the term ‘resort’ meaning with respect to the zoning it embodies. That is, there is no room for activity that the residents and public would perceive in the Millbrook landscape as being anomalous to what they understand Millbrook Resort to be.

- 8 This brings us to the central issue; the need to ensure development is consistent so as to maintain overall landscape coherence throughout the MRZ. It is my opinion that what the submitters are proposing will be inconsistent due to high density residential development, its overall extent and sole reliance on the District Plan’s standards and discretionary matters. It is clear that the submitters are not willing to embrace Millbrook’s design guidelines and other protocols that I describe in my EIC.
- 9 In this regard Ms Smetham observes, as I do, that Millbrook exhibits ‘*A strong sense of coherence....and an aesthetically pleasing outlook and strong visual character.*’<sup>4</sup> She goes on to note that: ‘*The perception of coherence is provided by the highly modified golf course setting, planting and consistent architectural style.*’<sup>5</sup> And then concludes that ‘*Obviously this is driven by the MRZ provisions and Millbrook Design Guidelines.*’<sup>6</sup> In a similar vein, later she states: ‘*The MRZ relies on a parkland setting derived from the existing landform, a comprehensive design layout and management standards (i.e. land cover and quality) and the application of design guidelines to result in the Millbrook character.*’<sup>7</sup> I agree.

---

<sup>4</sup> Paragraph 65

<sup>5</sup> Op cit.

<sup>6</sup> Op cit.

<sup>7</sup> Paragraph 90

- 10 As mentioned, the submitters are relying on the Plan standards and discretionary matters alone to achieve outcomes commensurate with those they believe exist within the MRZ. In my opinion while these are necessary and helpful, they are not sufficient to achieve the very high standard of development and consequent amenity currently enjoyed within the MRZ.
- 11 All of the MCC design protocols that I have identified and addressed in my EIC therefore need to apply as well. This includes the Design Guidelines that Ms Smetham recognises as a necessary ingredient to delivering Millbrook's character and amenity, and Millbrook's Master Plan process.
- 12 To begin with, those charged with administering the discretionary matters will not have a vested interest in the MRZ environment. Further, there is no guarantee they will appreciate the site specific nuances that necessarily inform design outcomes. Such nuances include height controls imposed in direct response to site conditions whose aim is to protect views and outlook, which is currently demonstrated throughout the MRZ. The most recent example of this occurred in the 'Dalgleish Farm' where lower height limits are imposed ranging from 5.5m to 6.5m. Such limits are sufficient to accommodate two floors, while ensuring views from within Millbrook and those of neighbours and the public are protected. The same applies to the location, extent and type of landscaping.
- 13 Additionally, the discretionary matters do not take into account ongoing maintenance, whose agency is currently vested in MCC for post development activity within the MRZ (described in Mr O'Malley's EIC). Consequently there is no guarantee that the amenity expected of Millbrook will be maintained to the very high standard currently enjoyed by residents and visitors.
- 14 The number of dwelling units sought by the submitters is also inconsistent with the permitted MRZ density. The maximum number of dwelling units allowed within the MRZ overall is 450. That equates to one unit per 6000m<sup>2</sup> of land (the current MRZ comprises 270 hectares).
- 15 This ratio however, is not applied uniformly within the MRZ. For example, the 67 hectare Dalgleish Farm block recently re-zoned from Rural General to MRZ is to accommodate no more than 50 dwellings. This represents a ratio of one dwelling unit per 13,400m<sup>2</sup>. What this illustrates is that each 'neighbourhood'

within the MRZ incorporates unique characteristics or factors that dictate dwelling unit numbers. For the Dalglish Farm, these factors include its relatively high elevation, landscape features that merited protection, landscape areas and the golf course. On top of that was the need to accommodate access in such a way that it does not impinge on the landscape quality of the site. The same principle would apply to those sites sought for MRZ inclusion by the submitters.

- 16 The Malaghans Road submitter site comprises 9.1 hectares. At the current MRZ density that would equate to 15 dwelling units rather than the 88 sought. In applying the above-mentioned 'Dalglish Farm density' it would equate to 7 dwelling units, of which 4 could reasonably be located as indicated by the Environment Court in its 2011 decision referred to in my evidence in chief.
- 17 The submitter's combined Arrowtown / Lake Hayes Road sites collectively amount to 10.35 hectares. To be consistent with MRZ density, this would equate to 17 dwelling units, rather than the 90 sought by the submitter. In applying the 'Dalglish Farm density' it would equate to 8 dwelling units (i.e three more than the existing five dwellings).
- 18 The 15 and 17 dwelling units referred to above do not necessarily represent what is an acceptable maximum number however. Other factors have to be taken into consideration. These would include the location and extent of infrastructure, open space networks, landscape protection areas, provision for golf and the effects on views from within and outside of the MRZ and so on. Additionally, any such development would have to accord with the Millbrook Master Plan and overall Structure Plan.
- 19 Also affecting density are the dwelling site or lot sizes and site coverage. Ms Smetham refers to proposed Rule 43.5.4 amendment<sup>8</sup> where the lot sizes for R20 a- e and R21 a-b are not to exceed 500m<sup>2</sup>. Proposed site coverage for these lots is 50%.
- 20 Currently within the MRZ, the site coverage for individual dwelling units is 30%, significantly lower than that proposed by the submitters. For comparison, 30%

---

<sup>8</sup> Paragraph 21(e)

is about what occurs in low density suburban environments. I consider 50% to be too great as it does not take into account impervious surfaces and access-ways. Consequently there will be little scope for much landscaping. Further, such density will be inconsistent with that occurring elsewhere within the MRZ. As I have pointed out in my EIC, landscape consistency is crucial to the delivery of Millbrook's character and amenity.

- 21 Ms Smetham refers<sup>9</sup> to a further rule (43.5.3) which is proposed by the submitters concerning building colour. This proposed seeks to utilise the colour and materials controls that MCC developed for their R14, 15 and 16 sites. These sites are located on the Dalgleish Farm land now incorporated into the MRZ, and so are geographically separated from other parts of the resort. Further, this area is to have an all native planting theme, which the colour scheme alludes to. Consequently the colours are darker due to this and its relatively elevated position. It introduces some material and cladding changes appropriate for that location only but that would not be appropriate on the submitter's land. Additionally, as an example concerning materials, proposed rule 43.5.3 allows tray roofing and copper roofing which would be at odds with adjacent development in the older part of Millbrook where roof materials are limited to corrugated iron in two tones of grey and slate.

### **Conclusion**

- 22 The key landscape matter arising from Ms Smetham's evidence and that of the overall submission generally, rests on the issue of whether the existing character and amenity of Millbrook can be delivered to the proposed sites via the District Plan standards alone. For the foregoing reasons and those addressed in my EIC (in addition to that of Mr O'Malley and Mr Edmonds), it is my opinion that it cannot. As stated, it is my opinion that it is absolutely necessary for any additional development within the MRZ to adhere to all of the MCC design, master planning, maintenance and management protocols as well as those embodied in the District Plan.

---

<sup>9</sup> Paragraph 21(d)

**Andrew Craig** – *Landscape Architect*

A handwritten signature in blue ink, appearing to read 'Andrew Craig', on a light-colored rectangular background.

**Dated:** 27 June 2018