

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE
QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Te Pūtahi Ladies Mile Plan Variation in accordance
with section 80B and 80C, and Part 5 of Schedule 1 of the
Resource Management Act 1991.

**JOINT STATEMENT OF LANDSCAPE EXPERTS IN RELATION TO SLOPE
HILL OUTSTANDING NATURAL FEATURE**

DATED 18 OCTOBER 2023

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INTRODUCTION

- 1 This joint witness statement (**JWS**) records the outcome of conferencing of landscape expert witnesses in relation to the Slope Hill Outstanding Natural Feature (**Slope Hill ONF**).
- 2 The expert conferencing was held on 18 October 2023, via a video conference.
- 3 Attendees at the conference were:
 - (a) Bridget Gilbert for Queenstown Lakes District Council. Bridget Gilbert is the author of a statement of evidence dated 29 September 2023 which addressed landscape issues in relation to the Slope Hill ONF.
 - (b) Tony Milne, a landscape expert, on behalf of Glenpanel Development Limited (submitter 73) and Milstead Trust (submitter 108).
 - (c) David Compton-Moen, a landscape expert, on behalf of Glenpanel Development Limited (submitter 73) and Milstead Trust (submitter 108).

CODE OF CONDUCT

- 4 This JWS is prepared in accordance with sections 9.4 to 9.6 of the Environment Court Practice Note 2023.
- 5 We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

KEY INFORMATION SOURCES RELIED ON

- 6 The following material has been reviewed by and/or relied upon by all attendees when coming to our opinions:
 - (a) The TPLM Variation (and associated documents);
 - (b) The landscape evidence of Bridget Gilbert on behalf of QLDC), dated 29 September 2023;

- (c) The landscape evidence of Stephen Skelton (on behalf of QLDC), dated 29 September 2023;
 - (d) The relevant parts of the Section 42A Report as it touches on Slopehill ONF (**s42A Report**);
 - (e) Schedule 21.22.6 Slope Hill PA ONF Schedule of Landscape Values (notified version);
 - (f) Slope Hill PA ONF mapping;
 - (g) 21.22.6 Slope Hill PA ONF Joint Witness Statement, dated 4 October 2023;
 - (h) The PDP Decisions Version ONF/L mapping (Landscape Classification mapping);
 - (i) QLDC PDP Chapter 3 – Strategic Direction;
 - (j) QLDC PDP Chapter 4 Urban Development;
 - (k) QLDC PDP Chapter 2 Definitions;
 - (l) Te Tangi a te Manu (**TTatM**, Aotearoa New Zealand Landscape Assessment Guidelines).
- 7 The key facts and assumptions we have agreed on when coming to our opinions are as follows:
- (a) Mr Milne advised that the proposed water tanks are to be located as shown in **Figure 1** below. It is our understanding there will be three tanks of 1,000m³ in capacity. The tanks will be 15m diameter x 6m high. The tanks are to be sited on the west side of the gully with a base level of 414 masl with a batter slope of 1V:1.5H to the north (uphill) and bunding of a similar gradient to the south (downhill). We understand slope gradients are subject to advice by a Geotechnical Engineer. A grassed/gravel access track is also required to provide access to the tanks for maintenance¹.

¹ Flints Park Fresh Lodgement Stage One – RMM Landscape and Visual Assessment – dated 8 September 2023.

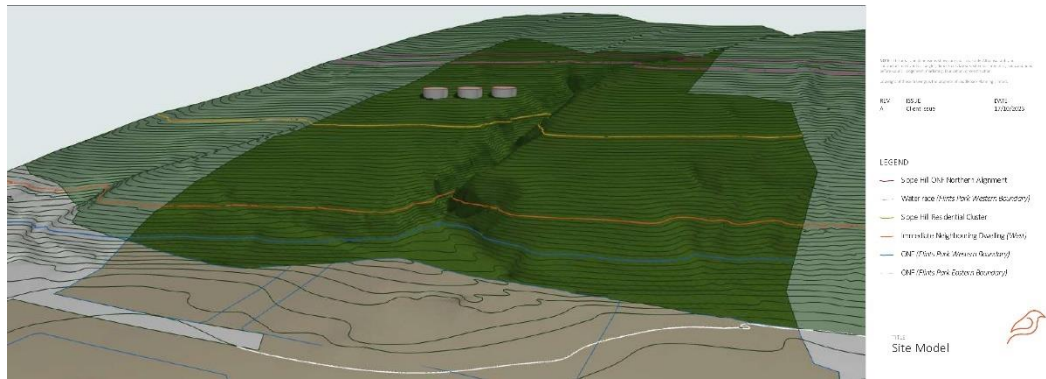


Figure 1 - Image showing the potential location of water tanks within the ONF (provided by Saddleback)

- (b) The scale and character of urban development anticipated in RMMLA Concept Plan is for a Homestead Precinct that is a distinct neighbourhood in its own right that focuses on a transformed Glenpanel Homestead. It is anticipated that it would comprise four development (sub precinct) areas:
- i. The Glenpanel Homestead and grounds;
 - ii. Medium Density Residential (MDR) to the west of the homestead featuring additional height;
 - iii. Additional MDR against the toe of Slope Hill, and;
 - iv. A mixed-use Local Centre to the east of the homestead.
- (c) These respective components are anticipated to deliver sufficient residential density to support a well-functioning and vibrant local centre. This is shown in **Figure 2** below.

Homestead Precinct Landscape Concept



Figure 2: Indicative Homestead Precinct Landscape Plan (green dashed-dot line corresponds to PDP Decisions Version ONF boundary and the 21.22.6 Slope Hill PA ONF boundary)

- (d) Development recognises the historical features of the Homestead site including the - Homestead dwelling, cottage, and grounds. It is understood the Homestead dwelling will be repurposed for community or commercial activity, such as a café, so that it becomes a focal point for the neighbourhood, the wider development and district.
- (e) The Homestead grounds will become a versatile space, generally available for public use, including an open lawn, terraces, maintained gardens, playground, and trail network with linear access east-west across the toe of Slope Hill. The concept will maintain the existing mature planting which will be complemented by further planting to enhance the grounds and increase the ecological qualities of the site. A mix of apartments retail, and commercial buildings are proposed to create this precinct with buildings typically ranging in height from 8m to 13m.


PURPOSE AND SCOPE OF CONFERENCING

- 8 The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement in relation to landscape issues relating to the Slope Hill ONF relevant to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**).
- 9 Conferencing covered all matters on a preliminary agenda which had been circulated to the experts in advance of the conferencing.
- 10 **Attachment A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.


Dated: **18 October 2023**



Bridget Gilbert



Tony Milne



David Compton-Moen

ATTACHMENT A – EXPERT CONFERENCING ON SLOPEHILL OUTSTANDING NATURAL FEATURE

Participants: Bridget Gilbert (BG), Tony Milne (TM), David Compton-Moen (DCM).

Issue	Agreed Position	Disagreements or reservations, with reasons
<p>Landscape values of Slope Hill ONF (including reference to Slope Hill Priority Area ONF Schedule of Landscape Values)</p>	<p>The experts agree:</p> <p>[a] The experts agree that the rebuttal version of 21.22.6 PA ONF Slope Hill is largely appropriate at the scale of the Slope Hill ONF as a whole, subject to the recommended change the use of the ‘no’ landscape capacity rating terminology to ‘extremely limited or no’ landscape capacity rating agreed between the planning and landscape experts, at the conferencing session on 3 October.</p> <p>[b] Infrastructure associated telecommunications, the Queenstown Airport along with farming activities, including farm tracks, fence lines, water races, and a farm shed are located within the ONF. Many of these modifications are less visible when viewed at greater distances; or, in relation to views from SH6, are obscured by vegetation on or alongside the boundary of the state highway (depending on the viewing location).</p> <p>[c] Urban development throughout Ladies Mile anticipated under the Variation is likely to obscure views of parts of the lower margins of the landform feature in views from SH6 and parts of the Ladies Mile flats. This is expected to include parts of the lower margins of the roche moutonnee landform that coincide with the Glenpanelsite.</p> <p>[d] The stream gully (supporting both exotic and some native vegetation) is an important and easily recognisable physical</p>	<p>In respect of the Glenpanel Site, Messrs Milne and Compton-Moen consider:</p> <ol style="list-style-type: none"> 1) The Glenpanel Site generally displays a greater degree of modification, relatively typical of the lower slopes and at the toe of the hill. 2) In regard to openness, the mid to upper slopes portray an open character with limited built form noticeable. This openness is currently enhanced by the existing pastoral vegetation cover, although regarding the Glenpanel Site the openness is more contained by farm tracks, fences, water races, and vegetation around the gully (noting there are two other gullies on this southern face that display similar characteristics). 3) Because of the visibility and physical characteristics described in [b] and [c], both physically and visually this ‘blurs’ the reading of the underlying landform and leads to a transition area, in which the Glenpanel Site sits, between the more valued upper slopes and the more varied in character, lower slopes of Slope Hill. 4) Ms Gilbert considers that while there are vegetated gullies, shelter belts, tracks and scattered trees across the lower southern flanks of the roche moutonnée (including outside the Glenpanel site), these are interspersed with appreciable areas of open and uncluttered, steep pastoral slopes. Ms Gilbert

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	<p>hydrological feature on the slope of the Glenpanel Site. The indigenous gully planting reinforces the legibility and expressiveness values of the gully, in association with the two vegetated gullies to the east of the Glenpanel site on the south side of Slope Hill.</p>	<p>considers that this patterning establishes a strong impression of landscape coherence across the southern side of the roche moutonnée.</p> <p>5) Further, Ms Gilbert considers that the geomorphology (including the topographical patterning) of the roche moutonnée forms a distinctive contrast with the planar landscape associated with the Ladies Mile flats at the base of the landform, that is highly legible and is highly expressive of the formative glacial processes.</p> <p>6) Collectively, these characteristics mean that Ms Gilbert does not agree that there is: a blurring of the landscape feature boundary across the Glenpanel site; a differentiation in landscape values between the upper and lower flanks of the southern side of Slope Hill; or a 'transitional landscape' along the toe of the landform feature in the vicinity of the Glenpanel site.</p>
<p>Is the Slope Hill ONF boundary correct?</p>	<p>[e] The experts agree that the water tanks may be able to be absorbed on the site assuming:</p> <ul style="list-style-type: none"> • They are located to optimise the integrating influence of the more complex localised landscape patterning associated with the vegetated gully on the Glenpanel site. • They are positioned so that they can be accessed via the existing farm track network (thus avoiding the need to cut a new track across the south side of the roche moutonnée). 	<p>7) Messrs Milne and Compton Moen consider that the existing Slope Hill PA ONF boundary is generally appropriate. It is their view that the UGB (and limited urban development) can overlap the Slope Hill PA ONF in this location, without compromising its key landscape values. However, if this is not the case, they consider that a finer grain assessment of the ONF boundary may determine a more appropriate boundary. Such an assessment would require the input of other experts (geologists, ecologists etc).</p> <p>8) Relying on her field work, review of Geology mapping, the Topic 2 Decisions and Dr Marion Read reports for the PDP Stage 1, and her landscape evaluation as part of the PA</p>

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	<ul style="list-style-type: none"> • The tanks are positioned to be at least partially buried (where practicable) and finished in a visually recessive colour. • The tanks are mitigated via: localised naturalised landform modification that is designed to marry in the with surrounding slope profiles; and/or indigenous restoration planting that is configured to integrate with the existing gully planting patterning (and thus form a cohesive and coordinated landscape element that reinforces the underlying topographical patterning). <p>[f] The experts acknowledge that the ‘success’ of such measures in ensuring the water tanks sit comfortably into the RMA s6(b) ONF landscape setting would however need to be tested via a detailed landscape assessment.</p> <p>[g] In their opinion, it is not uncommon that infrastructure of this nature needs to be located within ONF/Ls in the district. This is due to the following:</p> <ul style="list-style-type: none"> • the fact that approximately 97% of the district is ONF/L; • such infrastructure tends to have quite specific operational and functional needs; and • there is often ‘nowhere else to go’ for such infrastructure. <p>[h] The experts agree that from a landscape perspective, they do not consider that water tanks in their own right, read as urban development.</p>	<p>Schedules and Wakatipu Basin Land Use Planning Study, Ms Gilbert agrees with the Decisions Version of the Slope Hill PA ONF mapping along the south side of the roche moutonnée.</p>

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<p>What are the effects of water tanks at that location?</p>		<p>9) Messrs Milne and Compton-Moen consider that the potential landscape effects are on the values of the Slope Hill PA ONF. These include the following:</p> <ul style="list-style-type: none"> i. A 'very low' level loss of openness. ii. A 'very low' level loss of naturalness. However, a high perception of naturalness (that arises from the dominance of natural landscape elements and patterns at Slope Hill) will remain. iii. The built form of the water tanks remains subservient to the natural form of Slope Hill. <p>10) Potential effects on visual amenity as experienced from the highway and the wider receiving environment. These include:</p> <ul style="list-style-type: none"> i. the water tanks will be either not seen or barely noticeable in views of Slope Hill from a distance (for example the Remarkables Ski Field Road, SH6 adjacent to Lake Hayes) due to distance, topography, vegetation, and the coverall context of the viewing environment. They will have no impact on the broader ONL mountain context in these views. ii. The water tanks will be seen in views from immediately opposite the Glenpanel Site (eg. Howards Drive). In these views a sense of openness will be diminished, albeit the tanks will be seen in association with the adjacent gully planting. These views will also change markedly with the TPLM Variation, and the tanks will be viewed in the context of the TPLM Variation and

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		<p>they will be seen in the context of what will be an urbanised, rapid transport corridor.</p> <p>11) Ms Gilbert has not assessed the landscape effects of this aspect of the Variation and will address this in her rebuttal evidence (if required).</p>
<p>Effects of developing the proposed TPLM Variation area as notified on the Slope Hill ONF, including on the Glenpanel site</p>		<p>12) Messrs Milne and Compton-Moen consider that while the TPLM Variation avoids encroaching into the Slope Hill PA ONF, the Variation will introduce urban development directly adjacent to the ONF and consequently the ONF will read as sitting behind an urban corridor. Potentially this will compromise any shared and recognised values associated with the toe on the southern side of the Slope Hill PA ONF, due to this area being obscured in most views. This is in the context of the identified high legibility and expressiveness values of the Slope Hill ONF deriving from the visibility of this feature that enable a clear understanding of the landscape's formative processes.</p> <p>13) In their view, the TPLM Variation provisions (including policies requiring high quality building and site design, and those that support visual links to Slope Hill) assist in limiting adverse impact on Slope Hill ONF.</p> <p>14) The anticipated urban development throughout Ladies Mile will obscure views of the lower margins of the landform feature, therefore part of the Glenpanel Site, adjacent to Ladies Mile. Therefore, this places the protection of those physical values, that are identified in the <i>'Particularly important views to and</i></p>

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		<p><i>from the area' in 21.22.6 PA ONF Slope Hill, associated with the mid to upper slopes ONF even more important.</i></p> <p>15) Ms Gilbert disagrees with this analysis.</p> <p>16) In her view Messrs Milne and Compton-Moen have placed an overemphasis on visual amenity effects rather than the broad range of landscape effects (which is not consistent with landscape assessment best practise as guided by TTatM).</p> <p>17) In her view, the loss of visibility to parts of the lower slopes contemplated by the Variation does not diminish the landscape values of those parts of the feature that will be obscured from view by intervening built form (or diminish the landscape values of the feature in its entirety).</p> <p>18) Further, Ms Gilbert considers that Messrs Milne and Compton-Moen have overlooked the fact that in a district in which approximately 97% of the land area is classified as either ONL or ONF, it is inevitable that urban development will be juxtaposed against outstanding natural features and landscapes (to be protected under s6(b) RMA) in places.</p> <p>19) In her view, the fact that this long-established spatial relationship between urban development and ONFs (and ONLs) in the district (as outlined in (ii) above), has not, to date, resulted in the down grading of adjacent s6(b) RMA landscapes or features is, (in her view), evidence that the 'downgrading' of landscape values of the part of the ONF adjacent the Variation area inferred by Messrs Milne and Compton-Moen is incorrect.</p>

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<p>Whether the lower slopes of what is currently shown as ONF on the Glenpanel site have capacity to absorb urban development such as that as shown in the plan “Homestead Precinct Landscape Concept”.</p>		<p>20) Messrs Milne and Compton-Moen consider that, for the same reasons as outlined above, urban development can be absorbed in the ONF.</p> <p>21) Further to that, the urban development shown will be located at the immediate toe of the Slope Hill ONF and adjacent to the Glenpanel Homestead and its current setting that includes trees of heights not that dissimilar to the height of proposed built form. It is considered there is a greater capacity on the toe of the slope which is already roughly within the curtilage of the existing Homestead and is surrounding by mature plantings. In their opinion, future built form will be screened by existing or proposed mitigation planting and/or where existing vegetation within the gullies and around the Homestead can assist to anchor built form.</p> <p>22) Development as shown will be ‘tucked behind’ the intensive urbanised TPLM Variation Area and at the foot of Slope Hill ONF and therefore will be visually absorbed or contained. In their view, potential built form at the toe of the slope should of a scale and carefully sited to ensure it can be absorbed.</p> <p>23) Ms Gilbert disagrees. In her view, the idea of enabling urban development within the ONF is fundamentally at odds with the PDP policy approach of protecting the landscape values of ONFs. This is because introducing urban development in part of the ONF will inevitably mean that the area in and around the (new) urban development will fail to qualify as ONF due to:</p> <ul style="list-style-type: none"> i. the scale and extent of landform modification that would be required for the area to be developed for urban land uses; and

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		<p>ii. the marked change in the level and character of built development associated with urban land use.</p> <p>24) Ms Gilbert also notes that such a strategy would not align with the requirement to protect landscape values of ONFs when locating UGBs or extending towns and rural urban settlements through plan changes (PDP 4.2.1.5).</p>
<p>What are the effects of such urban development in that area?</p>		<p>25) Messrs Milne and Compton-Moen consider that such development would be acceptable from a landscape perspective.</p> <p>26) The development shown on the “Homestead Precinct Landscape Concept Plan” will be in an area that is not as visually accessible. Currently it is generally obscured by vegetation and in the future will be by urban development.</p> <p>27) The development as shown respects the heritage values associated with the Glenpanel Homestead.</p> <p>28) Ms Gilbert disagrees. While she acknowledges that such development may be developed in a manner that is sympathetic to the heritage values of the Glenpanel homestead, she considers that the extent of landform modification (for example, approximately 5m earthwork cuts) and scale of built form anticipated by the “Homestead Precinct Landscape Concept Plan” will not protect the physical and perceptual values of the Slope Hill ONF.</p>