

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Proposed District
Plan Stage 3 submission
related to proposed
Settlement Zone

**STATEMENT OF EVIDENCE OF MATTHEW STUART BENTLEY JONES
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**LANDSCAPE ARCHITECTURE – SETTLEMENT ZONE – LAKE MCKAY PARTNERSHIP
REZONING**

18 March 2020



S J Scott / R Mortiaux
Telephone: +64-3-968 4018
Facsimile: +64-3-379 5023
Email: sarah.scott@simpsongrierson.com
PO Box 874
SOLICITORS
CHRISTCHURCH 8140

CONTENTS

| | PAGE |
|---|------|
| 1. PROFESSIONAL DETAILS | 1 |
| 2. SCOPE | 2 |
| 3. EXECUTIVE SUMMARY | 2 |
| 4. BACKGROUND | 2 |
| 5. EVIDENCE APPROACH | 3 |
| 6. SUBMISSION 3196: LAKE MCKAY PARTNERSHIPS LTD (LAKE MCKAY)..... | 3 |

Appendix 1: Escarpment Building Restriction Area Plan

1. PROFESSIONAL DETAILS

- 1.1 My full name is Matthew Stuart Bentley Jones and I am Registered Landscape Architect with the New Zealand Institute of Landscape Architects (**NZILA**). I hold the position of Associate with Isthmus Group Limited, based in Auckland.
- 1.2 I refer to and adopt Section 1 of my first statement of evidence filed in this hearing, for rezonings related to the General Industrial Zone.
- 1.3 This statement of evidence relates to a site-specific **Settlement zoning** request on the following site:
- (a) Submission 3196: Lake McKay Partnerships Ltd.
- 1.4 I visited the Lake McKay Partnerships Ltd site (**the site**) on 11 February 2020 and undertook an on-site review and assessment. I am familiar with the wider landscape within which this site is located.
- 1.5 The key documents I have used, or referred to, in forming my view while preparing this evidence are:
- (a) The notified Chapter 20 Settlement Zone of the PDP;
- (b) The relevant submission relating to the site, including in particular the Vivian+Espie landscape assessment included as part of the submission;
- (c) The report by Opus International Consultants attached to Lake McKay's Stage 1 submission on the PDP; and
- (d) Mr Barr's Stage 3 Strategic Evidence (**Strategic Evidence**).
- 1.6 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witness contained in the Environment Court Practice Note 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.

2. SCOPE

2.1 My evidence is structured as follows:

- (a) Executive Summary;
- (b) A 'background' section where I provide a high level summary of the context and intent of the Settlement Zone;
- (c) An outline of the 'evidence approach' I have taken in the analysis and assessment of the appropriateness of the Settlement Zone on this submission site; and
- (d) Discussion of the submission site based on high level landscape analysis and which includes recommendations as to how the effects of development provided for by the Settlement Zone might be successfully absorbed.

2.2 I attach the following appendices to my evidence:

- (a) **Appendix 1:** Escarpment Building Restriction Area Plan.

3. EXECUTIVE SUMMARY

3.1 With respect to the Lake MacKay Partnerships Ltd submission (3196), I consider that there is capacity for the site to accommodate the type and density of development anticipated within the Settlement Zone.

3.2 I concur with Mr Espie's recommendation that buildings are excluded from the escarpment slope (refer Para 16) – Refer **Appendix 1** for the 'Escarpment Building Restriction Plan'.

4. BACKGROUND

4.1 It is my understanding that the Settlement Zone is intended to provide for spatially well-defined areas of low-intensity residential living proximate to a number of settlements within the QLDC jurisdiction, including Luggate. The primary objective is to enable low intensity

residential development located amidst the wider Rural Zone. The secondary objective is to maintain high quality amenity values and residential character within this zone. This relates to matters such as height, bulk, location and character of proposed development subject to a series of provisions and rules.

5. EVIDENCE APPROACH

5.1 Time has not permitted a detailed landscape assessment of the site. Rather my evaluation is effectively 'high level', and addresses the following:

- (a) A brief description outline of the planning history related to the site through the stages of the PDP review.
- (b) A brief description of the existing landscape character of the site proposed for rezoning.
- (c) Commentary as to whether, from a landscape perspective, the proposed rezoning is appropriate in this setting with an explanation of the factors that weigh in favour of the opinion expressed. This includes review of Mr Ben Espie's (Vivian+Espie Ltd) landscape assessment included as part of the submission.
- (d) Throughout this evidence, I provide an outline of potential landscape opportunities and constraints associated with the site. In general, identified landscape constraints are those likely to have the potential to detract from landscape values, and the identified landscape opportunities have the potential to enhance landscape values.

6. SUBMISSION 3196: LAKE MCKAY PARTNERSHIPS LTD (LAKE MCKAY)

6.1 The submission provided by Lake McKay relates to an area of land at 24 Atkins Road, Luggate¹, totalling an area of 14.4ha. The site includes a terraced area of land to the west of Luggate which extends

¹ Lot 1, DP 534249, held within Certificate of Title 880021.

towards Atkins Road and includes the existing residential dwelling of 24 Atkins Road. The site is accessed via Atkins Road and was formerly part of the Lake McKay Station.

6.2 I have been advised by Ms Bowbyes that the current zones, whereby the Rural Residential Zone applies to 12.3ha of land, and the balance is zoned Rural (landscape category RCL) can yield approximately 24 lots, and the SETZ would yield approximately 122 lots. This would result in an increase of approximately 98 lots.

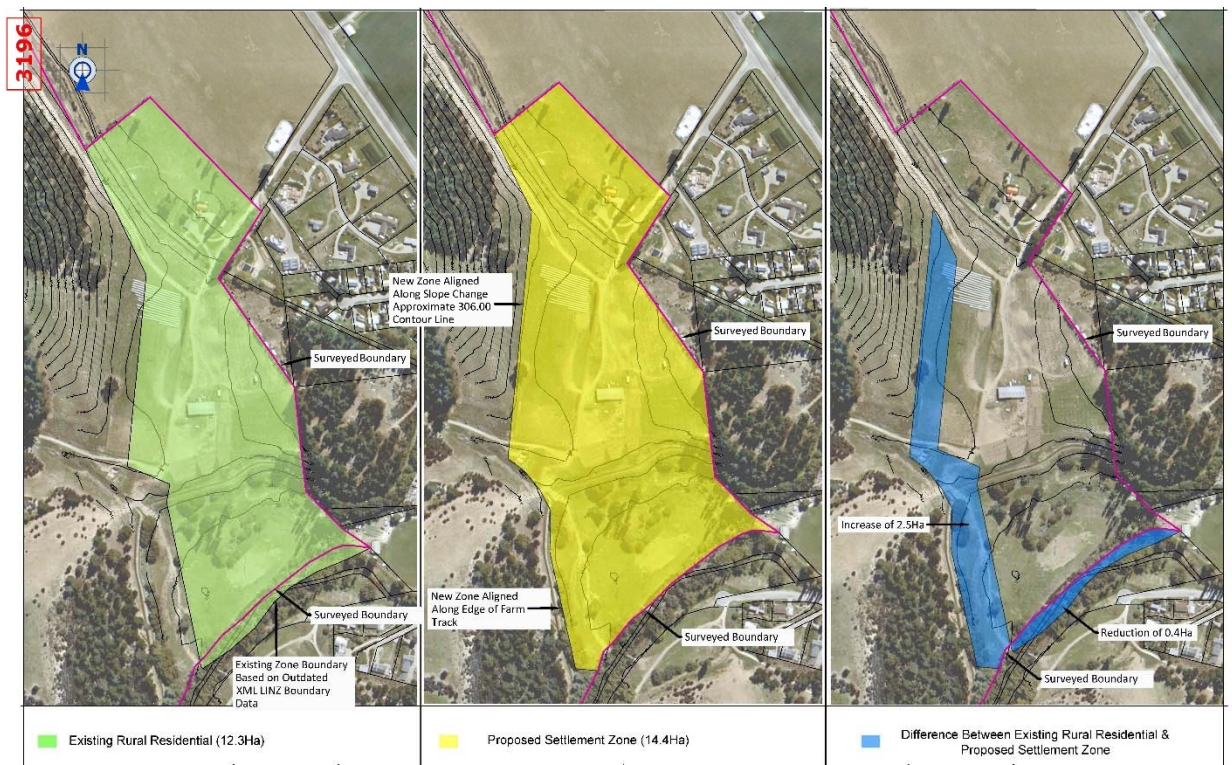


Figure 1: Submission 3196 site

6.3 This submission seeks to rezone this land as **Settlement Zone**, which includes aligning the zone boundary to follow the surveyed site boundary and topography, consequently expanding the site area to 14.4ha².

6.4 The lower terrace on the southern part of the site was identified as a BRA as part of the Stage 3 notified PDP³. Buildings within the BRA

2 As illustrated on the 'Proposed Settlement Zone' plan prepared by Paterson Pitts Group (30/10/2019) included with the submission.

3 As discussed within the landscape assessment provided by Mr Ben Espie and identified by Ground Consulting Ltd (refer '*Natural Hazards Assessment for Potential Rural Residential Subdivision*' dated 29 November 2018 included as part of the Submission).

are a non-complying activity within the Rural Residential Zone⁴ and the Settlement Zone⁵, however the submission seeks to change this to a Restricted-Discretionary activity for the site, via an amendment sought to Rule 20.5.18, with discretion limited to the management of a natural hazard. Alternatively, the submitter seeks removal of the BRA.

- 6.5** The Lake McKay submission on Stage 1 (483) included a Landscape and Visual Effects Assessment Report by Opus International Consultants⁶ that focused on the then-proposed area of Rural Residential Zone.
- 6.6** The Stage 3 submission that I address in this evidence argues that the proposed rezoning will result in a more efficient use of the land, will be serviced with key infrastructure (foul sewer and water), will provide a logical extension of the existing Luggate township and that the development densities will have no more than minor adverse effects on the environment⁷.

Existing Landscape Character and Attributes

- 6.7** A landscape assessment has been provided as part of the Stage 3 submission by Mr Ben Espie (Vivian+Espie Ltd), which builds on the expert landscape assessment⁸ provided as part of the Stage 1 submission. Within the submission the site is assessed by Mr Espie to have the following landscape characteristics and attributes:

“The site consists of flat terrace land that is used as improved home paddocks. The northern part of the site is adjacent to, and at the same level as Atkins Road. This area contains an existing dwelling, gardens and an old stables building. A shallow escarpment of 10 metres elevation separates this northern area from the central part of the site. The central part is again flat pasture and contains a woolshed, yards and holding paddocks. Moving south, elevation drops again by 10 to 15 metres down an escarpment that

4 PDP Rule 22.4.12.

5 Rule 20.5.18.

6 Opus International Consultants, Lake McKay Station Plan Change – Atkins Road Rural Residential Zone – Landscape and Visual Effects Assessment, September 2015. Attached to Stage 1 PDP Submission 483.

7 Refer Page 7 of the submission (#3196).

8 Prepared by Opus International Consultants (as outlined above).

accommodates a water race, such that the southern part of the site consists of rough flat paddocks adjacent to Luggate Creek.”

- 6.8** I generally agree with this landscape description, however I add that the site is characterised in part by its settlement edge location, with the immediate setting of Luggate township apparent. Furthermore, the site is largely devoid of vegetation, with some larger trees apparent on the lower southern terrace adjacent to Luggate Creek. The site includes three separate terraces to the north, centre and south, separated by escarpments. There are also stands of established pine trees in adjoining properties.
- 6.9** The localised landscape character is defined by a broad basin topography, with wider agricultural land uses to the north and west. The immediate setting of the site to the east is characterised by the predominantly low density development associated with Luggate township.

Is the Settlement Zone appropriate for this site from a landscape perspective?

- 6.10** Through my assessment of the submission, including review of Mr Espie’s landscape assessment, and high-level analysis, I consider that there is capacity for the site to accommodate the type and density of development anticipated within the Settlement Zone.
- 6.11** In my opinion, the site specific attributes and characteristics, and design opportunities which support the Settlement Zone include:
- (a) Its location adjacent to the existing Luggate township to the east.
 - (b) The location of the site forms a logical extension to Luggate, with the rising topography to the west and the creek to the south forming natural defensible boundaries to development within the site and township.
 - (c) The ‘low-intensity residential living’ anticipated by the zone will be complementary to the existing settlement patterns in Luggate (noting that I understand Ms Bowbyes is recommending these words change to ‘low density’, which I do not oppose).

- (d) The improved provision of key infrastructure within the site which now supports a density of development anticipated by the Settlement Zone.
- (e) The favourable topography of the site, with 'compartmentalised' expanses of terraced land (north, central and southern extents) which allow for development patterns anticipated by the Settlement Zone. Note, in my opinion, future development must adhere to the BRA outlined within the Ground Consulting Ltd report⁹ (which accompanied the submission). This is in relation to responsible design responses to natural hazards and future development within the flood plain.
- (f) The terraces are separated by escarpments. I concur with Mr Espie's recommendation that buildings are excluded from the escarpment slope (refer Para 16) – Refer **Appendix 1** for the 'Escarpment Building Restriction Plan'. This BRA will provide a visual 'break in built form' between the upper and lower terraces.
- (g) The visually contained nature of the site. It is set back from State Highway 6 (Wanaka-Luggate Highway) to the north and is visually separated by existing development and large established trees along the Luggate Creek. From SH6, where future buildings may be visible, they will be seen in the context of the adjacent existing development associated with Luggate accessed off Atkins Road.

6.12 For the reasons outlined within this statement of evidence, I do not oppose the relief sought by submission 3196 that the site be rezoned from Rural Residential Zone and Rural Zone to Settlement Zone. However, I recommend that a BRA is mapped on the northern escarpment area as identified on the 'Escarpment Building Restriction Plan' attached as **Appendix 1**.

9 Refer Drawing No. 002.

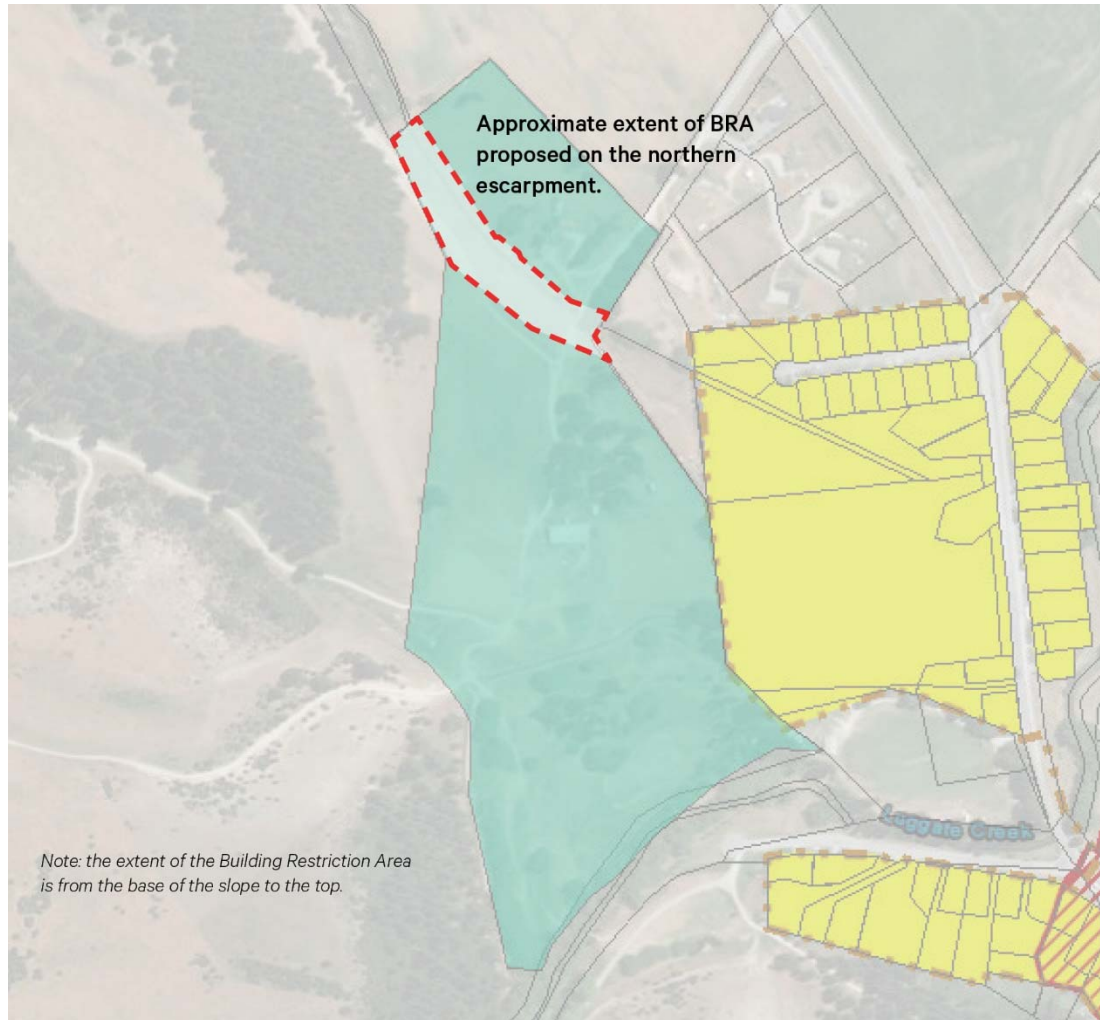
A handwritten signature in black ink, appearing to read 'M Jones', with a stylized, overlapping 'M' and 'J'.

Matthew Jones

18 March 2020

APPENDIX 1

Escarpment Building Restriction Area Plan



Note: Not to scale. (Base plan sourced from QLDC.maps.arcgis.com)