Before Queenstown Lakes District Council

In the matter of

The Resource Management Act 1991

And

The Queenstown Lakes District Proposed District Plan Topic 13 Queenstown Mapping – Group 1B (Queenstown Urban

(Frankton and South))

SUMMARY STATEMENT OF EVIDENCE OF JAMES BENTLEY FOR

Hansen Family Partnership (#751) FII Holdings (#847) Peter and Margaret Arnott, Fernlea Trust (#399) The Jandel Trust (#717) Universal Developments (#177)

Dated 15 August 2017

Solicitor:
Rosie Hill
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
rosie.hill@al.nz

Counsel:
Warwick Goldsmith
Barrister
PO Box 213, Queenstown 9365
m + 64 021 220 8824
warwickgoldsmith@gmail.com

SUMMARY EVIDENCE

- My name is James Bentley. I am a Principal Landscape Architect with environmental consultancy firm Boffa Miskell Limited. I am a fully registered Landscape Architect with the New Zealand Institute of Landscape Architects (NZILA), a chartered member of the British Landscape Institute as well as holding an honorary degree and post-graduate degree from the University of Gloucestershire in Landscape Architect. I have approximately 15 years of experience in landscape planning matters.
- 2 My Evidence in Chief (EIC) dated 9 June 2017 outlines my experience and qualifications relevant to this evidence in respect of the Queenstown Mapping Hearings of the Proposed District Plan (PDP).
- 3 Since preparing my EIC, I have also had the opportunity to read the rebuttal landscape evidence of Dr Read on behalf of Council.

Location of the ONL boundary

- Within my EIC I clearly set out a description of the existing environment of the Site, the subject of the proposed rezoning (Site). This description not only describes the biophysical condition of the landscape, but also the aesthetic and associative aspects. I note that Dr Read also includes detailed descriptions of the environment in her EIC. There is agreement between the both of us that Ferry Hill and Hill A3B2 are considered to form part of an ONL.
- There is disagreement between us as to where the ONL boundary should be delineated, specifically within the area close to SH6/ Frankton Flats as illustrated on my Figures attached to my EIC.
- As outlined in my EIC, I consider that a purely geomorphological approach to mapping landscape boundaries is incorrect¹, and inconsistent with the broader mapping that has occurred for the remainder of the ONL, particularly to the east and in some locations to the west of the Site.
- It is my opinion, that a geomorphological approach (i.e. the interface between the Frankton Flats and the hill slope or even a topographical approach at the top of the slope as the top is not clearly defined by one contour) would not be appropriate in this location due to the cultural overlays that are currently present on the Site.

2887484 page 1

¹ It is certainly a helpful starting point; however, landscape involves many other aspects and is best defined as *'Landscape is the cumulative expression of natural and cultural features, patterns and processes in a geographical area, including humans perceptions and associations'*, NZILA

- Cultural overlays include the transmission substation, transmission towers, houses, tracks, shelterbelts, a water race, reservoir, grazed land and the recently approved four lot subdivision². All of this is influenced by the close location of SH6 and the adjacent mixed used development at Frankton Flats (which includes commercial, industrial, retail, visitor accommodation and housing). All of this has an influence on the naturalness of the area, which is a key consideration concerning the classification of the landscape.
- I have identified that the existing water race is the appropriate ONL boundary in this instance. Whilst there is little immediate difference in character either side of the race, it is clear from a broader landscape perspective, that land use activities are more strongly defined south of this line and human influence is more prevalent. Dr Read picks up on this in her EIC, however does not accept that the character is so strongly different that the race should be the defining boundary.
- 10 It is my evidence that geomorphology is one relevant aspect in delineating ONL boundaries, however other factors are also relevant for any such determination, and in this circumstance the cultural overlays have dictated a different pattern to biophysical attributes of the landform. Further east of the Site, the Quail Rise development has curtailed the ONL boundary from being delineated along Ferry Hill's natural geomorphological boundary, where it instead skirts above housing along the lower slopes.
- Dr Read has not included in her description the recently consented four-building platform subdivision off Hansen Road³. This development, whilst not yet built, has been approved through resource consent and will result in further changes to the land south of the water race. This, along with the transmission towers, substation and other buildings, further reflects a character more closely related to the flats than the undeveloped, more open and elevated land above the water race.
- The identification and delineation of ONLs is about identifying and defining the characteristics that support these overlays so as to then determine appropriate land management. The core values and characteristics of this ONL overlay relate to the upper uncluttered open parts of these dramatic and highly legible features. The lower slopes are where these values and characteristics start to be compromised by cultural interventions and become 'less natural'. The current and consented land uses on the lower slopes have dictated where the ONL boundary should be delineated (east and west of the Site).

2887484 page 2

² RM151046

³ Ibid

- There is nothing within the evidence of Dr Read that convinces me that the ONL boundary should remain in its notified location. The Site is partly associated with the developed flat land of the Frankton Flats and partly with the more elevated land associated with the landforms of Ferry Hill and Hill A3B2. Whilst a geomorphological boundary to the ONL is of some assistance, this does not recognise the scale of cultural activity that has occurred to the east and west. Cultural interventions are strong and, as discussed further below, urban development on this Site would not be inappropriate in this location based on landscape or 'natural' considerations.
- The appropriate solution in my opinion is to locate the ONL boundary where it more readily reflects the values that underpins the ONL, safeguards the lower part of the ONL from potentially greater effects, and provides a line in the ground that is more meaningful and transparent to the local community and decision makers.
- It is therefore my opinion that this very small interconnecting ONL boundary should be aligned along a meaningful line in the landscape. This meaningful line is the water race.

Effects of the proposed development on landscape

- From a visual perspective and as stated in my EIC, irrespective of where the ONL boundary is located, buildings on the Site would affect the visibility of the lower slopes and in part some of the upper slopes when travelling along SH6. This is due to the fact that larger buildings could be developed on this Site, providing an 'urban entrance' to Queenstown. Based on the current context, I do not consider that this is significant.
- Overall, I consider that urban development on this Site would be appropriate for a number of reasons, including that:
 - Development would not otherwise undermine the values and qualities of the broader ONL, due to the existing human interventions that have lowered the naturalness of the Site;
 - Visually, development would appear consistent with the contextual character of what is occurring more broadly on the Frankton Flats;
 - Although views towards the ONL would be affected, the views currently obtained are not significant and some views towards the more elevated parts of the ONL would still be apparent;
 - Development would consolidate the urban entrance to Queenstown.

James Bentley, 15 August 2017