

**Before the Expert Panel appointed
under the Fast-track Approvals Act 2024**

Under

the Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Mt
Iron Junction Limited to develop 250
medium to high density residential
dwellings, a childcare centre, a retail
building, a café, reserve areas and
recreation amenities

**Statement of Evidence of
Paul Andrew Smith on behalf of
Mt Iron Junction Limited in response to
comments made under Section 53**

Landscape

Dated: 26 June 2026

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INTRODUCTION

1. My name is Paul Andrew Smith. I am a Senior Landscape Architect employed by Rough Milne Mitchell Landscape Architects (**RMM**), based out of our Ōtautahi Christchurch and Hakatere Ashburton offices.
2. I hold a Bachelor of Landscape Architecture (Hons) degree from Lincoln University and am a Registered Member of Tuia Pita Ora New Zealand Institute of Landscape Architects (**NZILA**). Also, I am a Landscape Planning Judge for the 2026 NZILA Awards.
3. I have been practising as a Landscape Architect, primarily in the field of Landscape Planning, since 2012. I was employed by Vivian+Espie, a specialist resource management and landscape planning consultancy based in Queenstown from 2012 – 2017, and then by Beca as a landscape architect, specialising as a landscape planner from 2017 – 2019. Since 2019, I have been employed by RMM in the same role.
4. I have been involved in a significant number of projects within the Queenstown Lakes Districts over the past 14 years. The majority of my work involves advising clients regarding the protection and maintenance of landscape and amenity values that the Resource Management Act 1991 (**RMA**) and District Plans require. I also prepare Landscape Assessment Reports for Resource Consent and Fast-track Applications, Plan Changes and Submissions on District Plan Reviews, and provide evidence for local Council Hearings and Environment Court Hearings.
5. This statement is given as part of Mt Iron Junction Limited's (**MIJ or Applicant**) response to comments on the Mt Iron Junction Housing Scheme (**Project**) made under Section 53 of the Fast-track Approvals Act 2024 (**FTA**). This statement responds to specific comments raised by:
 - (a) The Boffa Miskell Landscape Architecture Peer Review prepared by Ms Sue McManaway, Registered Landscape Architect, dated 12 June 2026 for Queenstown Lakes District Council.
 - (b) Landscape Evidence prepared by Elizabeth Anne Steven, Registered Landscape Architect, dated 19 June 2026 for CM Morgan and JC Morgan Family Trust.
 - (c) The nine comments from adjacent landowners that oppose the Project. Noting the tenth comment supports the Project.
6. My original findings are provided in full the Landscape Assessment Report (**LAR**) and its Graphic Attachment (**GA**) dated 17 December 2025.

7. The Architecture and Landscape Design plans illustrating the Project have been prepared by Figure and Ground Ltd and DCM Urban Ltd (**DCM**), respectively. DCM prepared visualisations to assist with understanding what the Project will look like from salient viewpoints around the Site. These plans and visualisations were included in the Substantive Application.
8. Mr Compton-Moen has appended four additional visualisations from Mount Iron and Balneaves Lane to his statement of evidence in response to Section 53 comments. For ease, this appendix to his evidence includes all nine visualisations prepared for the Project.
9. I have prepared this statement in the limited time available for the Applicant to respond to comments under the FTA. If the Panel requires elaboration on any of the matters raised in this statement, I am available to provide further information on request.
10. Although this is not an Environment Court proceeding my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Appendix Seven (Expert Confirmation of Compliance with Code of Conduct) of the Legal Overview submitted as part of the substantive application and further Code of Conduct Table confirming my qualifications and experience provided to the Expert Panel on 26 June 2026.

SCOPE OF EVIDENCE

11. The landscape related issues raised by Ms McManaway, Ms Steven and adjacent landowners' comments are similar. Therefore, my evidence responds to the issues raised, under the following headings:
 - (a) Site History;
 - (b) Relevant Policy Provisions;
 - (c) Landscape Description and Pattern of Urban Growth;
 - (d) Visual Effects;
 - (e) Landscape Effects; and
 - (f) Conclusion.

SITE HISTORY

12. Ms McManaway has provided a summary of the two previous resource consent decisions within the Site. These are RM181471, that approved the mixed use

development within the Site and RM230874, that declined the McDonald's restaurant.

13. It is important to highlight that these two applications were processed as *non-complying* resource consent applications. Therefore, had to meet at least one of the two section 104D non-complying gateway threshold tests, with RM181471 meeting both.¹
14. In the LAR I acknowledged that the current proposal would be contrary to the relevant Rural Zone related landscape policies.
15. However, The FTA and the RMA consenting processes differ. The purpose of a Fast-Track Application process is to *"to facilitate the delivery of ... development projects"* and provide *"a more streamlined system than current processes, which require separate applications for different types of approvals."*² As noted in my LAR, in this case the Fast-Track process replaces what would otherwise likely require both a plan change and resource consent. Albeit if approved, the underlining zoning does not change.
16. Ms McManaway's summary omits to highlight RM181471 Condition 60g, as appended to her peer review and referred to in my LAR.³ Condition 60g allows for the removal of the consented Protected Landscape Area (**PLA**) covering approximately 1.9 hectares of the Site's southwestern third, once the underlying zoning changes. A key reason for this, was that under the RMA process applying to that decision the underlying Rural zoning there was a need to maintain openness and rural character. As outlined in my LAR, this application is under a different Act.
17. In this regard, I agree with Ms McManaway and Ms Steven that the Site forms part of the 'gateway' entrance into Wānaka and Mount Iron's perceptual values as a sentinel role in this entrance experience must be protected.

RELEVANT POLICY PROVISION

18. Ms McManaway, Ms Steven and I all agree that under the Queenstown Lakes Proposed District Plan (**PDP**) the Site is zoned Rural, is classified as a Rural Character Landscape (**RCL**), is outside the Urban Growth Boundary (**UGB**) line and sits adjacent to the Mount Iron Outstanding Natural Feature (**ONF**).⁴ Also, I agree

¹ *Mt Iron Junction v Queenstown Lakes District Council* [2021] NZEnvC 53 at [24].

² Ministry for the Environment "Fast-track approvals process" (last updated 7 February 2025) Ministry for the Environment <www.environment.govt.nz>.

³ Substantive Application, Appendix D1 – Landscape Visual Assessment, page 41.

⁴ Queenstown Lakes District Council Proposed District Plan, Policy 6.3.1.1. All land zoned Rural has must be classified as ONF, ONL or RCL, with no other classification available.

with Ms Steven that Mount Iron and the Site is zoned Rural.⁵ However, Ms Steven's comment alludes to the idea that they have similar landscape characteristics and values, which in my opinion is not the case. This is outlined in Ms Steven's 2014 Peer Review of ONF/Ls in the Upper Clutha Basin.⁶ In her peer review she clearly illustrates that the Site does not form part of the Mount Iron ONF and this is adopted in the PDP. Noting that Ms Steven's peer review was undertaken prior to RM181471 being proposed.

19. Ms McManaway raises concern that the LAR has not assessed the proposal against the PDP RCL objectives, policies and assessment matters. Instead, she considers that my *"assessment of effects [is] highly dependent on the characterisation of the Site and its context and places more reliance on the interpretation of the receiving environment as peri-urban."*⁷
20. Fast-Track housing projects are of a size and scale that will materially change the character of the landscapes they are located. Therefore, when assessing the actual and potential landscape effects, I consider it more appropriate and useful to the Panel to assess a proposal more akin to a plan change and assess the suitability of a location to accommodate growth, and the appropriateness of the residential activity in the context. Following this, I considered the actual and potential landscape effects on the receiving environment's landscape character and values at a resource consent level focussing on design details. Again, noting that the underlying zoning won't change as part of this Fast-track process.
21. My LAR followed this process by considering the Queenstown Lakes Spatial Plan and assessing the project against the PDP Strategy Chapter. Then, the LAR goes onto assess the proposal against the peri-urban character of the receiving environment.

⁵ CM Morgan and JC Morgan Family Trust: Section 53 Comments, Landscape Comment of Elizabeth Anne Steven, 19 June 2026 at [14].

⁶ For the Queenstown Lakes District Plan, Anne Steven Landscape Architect. Peer Review of Landscape Assessment Outstanding Natural Landscape of the Upper Clutha Part of the Queenstown Lakes District. June 2014, Page 41.

⁷ Queenstown Lakes District Council Section 53 Comments, Appendix 2 – Queenstown Lakes District Council Landscape Peer Review by Sue McManaway, 12 June 2026 at [35].

22. I have acknowledged inconsistency with some of the objectives and policies of the Rural Zone. However, as outlined in my Response to Queenstown Lakes District Council's letter on information gaps, I do not consider the RCL objectives, policies and assessment matters to be overly relevant, and an assessment against them is not helpful to the Panel.⁸ This is because:
- (a) The RCL is too small to form its own landscape, most recently highlighted by the Sticky Forest Environment Court decision.⁹ Noting that I have considered the proposal as a plan change and resource consent in one, so this decision is relevant.
 - (b) The "*rural zoning and UGB is an anomaly when viewed in the context of existing and consented residential and commercial land uses*" within the Site.¹⁰
 - (c) These RCL policy provisions focus on "*maintaining rural character and enhancing amenity values within a rural environment, whilst enabling farming and rural resource-based activities to occur.*"¹¹ And my LAR "*identifies that the receiving environment, outside the Mount Iron ONF is peri-urban in character, not rural. Therefore, there are no rural characteristics or amenity values within a rural environment, within this RCL that need to be maintained.*"¹²
23. Regarding point (c) above at the wider Wānaka scale, this contributes to why the Site has a higher ability to absorb development. At a Receiving Environment scale, the Project will be consistent with the peri-urban character on Wānaka's outer edge consisting of denser development west of SH6 / Riverbank Road with Rural Residential (RR) and Rural Lifestyle (RL) development east of SH6 / Riverbank Road / Albert Town – Lake Hāwea Road fronting Ōrau / Cardrona River. "*This is consistent with [the] small node of townhouses based around the Alpine Junction / Albert Town shops and the High-Density Residential development anticipated within Three Parks, located 1.5kms and 500m away, respectively.*"¹³
24. Importantly, Ms McManaway, Ms Steven and I have all outlined that the key focus of the assessment is the entrance to Wānaka and the protection of Mount Iron's sentinel role and prominence on the entrance into Wānaka. This does reduce the

⁸ Request Further Information Response 1, Mt Iron Junction Housing Scheme, Rough Milne Mitchell Landscape Architects, RFI Response 1 – Landscape Attachment A 7 May 2026.

⁹ *Beresford v Queenstown Lakes District Council* [2024] NZEnvC 182.

¹⁰ Landscape Visual Assessment, above n 4, page 49.

¹¹ Request for Further Information, Landscape Attachment A, above n 11, page 3.

¹² Page 3.

¹³ Landscape Visual Assessment, above n 4, page 42.

Site's ability to absorb development, with the level of development needing to sit comfortably in the foreground of Mount Iron, while protecting its prominence.

LANDSCAPE DESCRIPTION AND PATTERN OF URBAN GROWTH

25. On review of Ms McManaway's Peer review and Ms Steven's Landscape Evidence, Ms Steven and I agree that the receiving environment is a peri-urban landscape¹⁴ and Ms McManaway considers that the landscape is a "*transitional/peri-urban*"¹⁵ landscape. This suggests that we are in general agreeance on the character of the receiving environment.
26. I found that we did not have many differences in opinion. Therefore, my below commentary focuses on these differences.

Urban Growth Boundary

27. Both Ms McManaway and Ms Steven have placed weight in their assessments on the Site being outside the PDP's UGB line.^{16 17}
28. The UGB line was identified in the PDP prior to RM181471 being approved, and until recently, private plan change requests on the PDP have not been accepted by Council. I.e. Council has not had an ability to properly analyse and change the location of the UGB line since RM181471 was approved.
29. I maintain my opinion that "*This boundary line does not reflect the actual existing context. Notably, the consented residential development forms part of the local context that will have a density of one dwelling per 1,240 m², contain a Caltex Service Station and a kerb-and-channel road network.*"¹⁸ Noting that this density equation includes all consented residential units, open green spaces and streetscape areas northeast of Junction Road, i.e. all of Lot 2 DP605028. This highlights the fact that "*This level of development [throughout the central and eastern two-thirds of the Site] reflects an urban character, with the density of development being aligned with the Low Density Suburban Residential Zone, being denser than the adjacent [Large Lot Residential – A and B] (LLR A), (LLR B), RR and RL Zones.*"¹⁹
30. I have read Ms Steven's paragraph 37 describing the nuanced location of the UGB in a way that responds to the existing landform and consented development. I disagree with Ms Steven's comments. This is because, two thirds of the Site contain

¹⁴ Landscape Comment of Elizabeth Anne Steven, above n 8, at [34].

¹⁵ Queenstown Lakes District Council Landscape Peer Review, above n 10, at [75].

¹⁶ At [45].

¹⁷ Landscape Comment of Elizabeth Anne Steven, above n 8, at [36]-[38].

¹⁸ Landscape Visual Assessment, above n 4, page 41.

¹⁹ Page 41.

consented development that is urban in character, that is denser than the adjacent LLR A zone. Subsequently by way of the PDP UGB definition²⁰ it should be situated within the UGB line.

31. Also, at a higher level, the Site is situated west of the Ōrau / Cardrona River that has been highlighted in the Queenstown Lakes Spatial Plan 2021 as the *urban extent* of Wānaka²¹, that is reinforced in the Draft Riverbank Road PA schedule.²² In saying this, the proposal will be consistent with the peri-urban character on Wānaka's outer edge, in particular the denser development around the Alpine Junction / Albert Town shops and the High-Density, 16.5 m tall residential development anticipated to line the western side of Riverbank Road within Three Parks.²³
32. Due to the above, I consider that the Site being outside the UGB is immaterial. Rather, the Site is appropriately located west of the Ōrau / Cardrona River, within Wānaka, in which it can accommodate further development.

Rural Character

33. As previously mentioned, Ms McManaway and I differ in opinion on the importance of maintaining open space. Ms McManaway's Peer Review places substantial weight on the RM181471 Environment Court Decision that reduced the originally proposed amount of built form within the Site to maintain open space. In that instance, the proposed resource consent application had to meet at least one of two non-complying gateway threshold tests, including maintaining rural character.
34. Rather, in this instance my LAR has considered the spatial growth of Wānaka at both a plan change and resource consent level, focused on the landscape character and values at both a Wānaka and receiving environment scale.²⁴ In doing so and for the reasons set out in sections 3 and 4 of my LAR, I opine that the receiving environment is peri-urban in character, not rural, and that the open space attributes that contribute to rural character within the Site need to be maintained.
35. Ms Steven opines that the outwash plain, not terrace landform within the Site is coherent with Mount Iron's Reserve's eastern margin. I understand Ms Steven's point, however, whilst the soil type maybe the same, it is immaterial to the

²⁰ Queenstown Lakes District Council Proposed District Plan, 2.1 Definitions - Urban Growth Boundary - Means a boundary shown on the District Plan web mapping application which provides for and contains existing and future urban development within an urban area.

²¹ Queenstown Lakes District Council Spatial Plan, July 2021, page 63.

²² Queenstown Lakes District Council Proposed District Plan, Schedule 21.23.8.

²³ The LAR GA Sheet 4 is out of date, illustrating that this land within Three Parks was zoned Low Density Suburban Residential Zone.

²⁴ Landscape Visual Assessment, above n 4, Section 3.5.

assessment because it does not materially contribute to the values of Mount Iron's roche moutonnée landform.

36. Also, I disagree with Ms Steven that the open space within the PLA will be rural in character. I concur that it currently forms part of the corridor of open space that road user's experience when entering Wānaka from the east. I concur that the openness within the PLA will maintain views to Mount Iron's rugged, rock-bluffed faces. However, this can be reduced to a similar degree as the proposal by way of additional planting, and the PLA is not protected in perpetuity due to RM181471 Condition 60g.

Summary

37. In summary, Ms Steven and I agree that the receiving environment is a peri-urban landscape, and Ms McManaway considers that the landscape is a transitional/peri-urban landscape.
38. Our difference in opinion regarding the weighting of the UGB line and the need to retain open space as to maintain rural character within the Site appear to be the key reasons why we disagree on the Site's ability to absorb change.
39. I appreciate Ms McManaway and Ms Steven's commentary, which was considered in my LAR. However, it does not alter my conclusion that at a Wānaka scale, the Site has a high ability to absorb change and at a receiving environment scale it is moderate, due to Mount Iron's ONF values and sentinel role on the entry to Wānaka. Therefore, the capacity of the Site and the receiving environment to absorb change is moderate to high.

LANDSCAPE AND VISUAL EFFECTS ASSESSMENT

Potential Landscape Issues

40. Ms Steven outlines the key landscape issues that need to be considered.²⁵ Ms Steven's points b) and c) align with my LAR section 5.1, and whilst I did not specifically mention effects on private residences (Ms Steven's point d) the LAR has considered them.²⁶
41. For the reasons discussed above, I disagree that maintaining rural landscape character, due to the underlying RCL policy provisions is required.
42. I note, Ms Steven's statement "*ensuring urban growth outside the Urban Growth Boundary and in rural zones is avoided and that it is contained within the future*

²⁵ Landscape Comment of Elizabeth Anne Steven, above n 8, at [27]-[30].

²⁶ At [29].

*urban areas identified in the QL Spatial Plan*²⁷ is not footnoted and I cannot find text in the PDP to this effect. Rather, the Urban Development Policies state the following, that have been taken into consideration in my LAR²⁸:

4.2.1.5 - When locating Urban Growth Boundaries or extending towns and rural urban settlements through plan changes, protect the values of Outstanding Natural Features and Outstanding Natural Landscapes.

4.2.1.6 - When locating Urban Growth Boundaries or extending towns and rural settlements through plan changes to provide for urban development, have particular regard to minimising significant adverse effects on the values of open rural landscapes.

43. Ms McManaway has not outlined any additional issues, above and beyond what is included in section 5.1 of my LAR.

Visual Effects Assessment – Public Places

44. Ms McManaway considers that the viewpoint photographs in the LAR GA provide a comprehensive narrative to assist with understanding the nature and scale of the proposal.²⁹ Also, she finds that the visualisations prepared provide a helpful representation of what the Project will look like.³⁰
45. As requested by the Panel in Minute 2, a total of nine visualisations have now been prepared. All nine visualisations are appended to Mr Compton-Moen's evidence. On review, the five additional visualisations align with their respective visibility description and reinforce the resulting visual amenity effects in my LAR.
46. Ms McManaway's and Ms Steven's concerns result from the prominence of built form when entering Wānaka from the west along SH6 and when travelling around the Site's perimeter along SH6 and SH84. I note that they have not raised concerns with regard to the visual amenity effects on users on Mount Iron, Riverbank Road, Balneaves Lane, Head Place, Clan Mac Road or Old School Road.
47. Ms McManaway raises concern with regard to close views to the development and the way in which it will reduce views to Mount Iron when travelling along the northern side of SH84, leaving Wānaka and the western side of SH6, travelling towards Albert Town.
48. I consider that Ms McManaway has overemphasised the importance of the 'closer views' towards Mount Iron when travelling past the Site along SH84. This is because a road user is travelling away from Mount Iron, and it does not form part of their main view.

²⁷ At [29(a)].

²⁸ Landscape Visual Assessment, above n 4, page 46.

²⁹ Queenstown Lakes District Council Landscape Peer Review, above n 10, at [49].

³⁰ At [55].

49. The view towards Mount Iron's summit and more impressive rock outcrops are perpendicular to the road alignment when travelling along SH6 past the first apartment block. Due to this, Mount Iron's summit does not form a key element in the view when travelling toward Aubrey Road / Albert Town, and if it does, it is very fleeting at best. I concur with Ms McManaway that the viewpoint 12 visualisations do not include the apartment building. However, due to the above, at best it will briefly interrupt this view, that can be interrupted by trees as of right.³¹
50. Ms Steven considers that the development will obscure views to Mount Iron, due to built form within its western half, the height of the three storey, 10m tall apartment blocks and these buildings being closer to the boundaries.³² Albeit Ms Steven does recognise that trees can have a similar screening effect. Albeit amenity trees will be more palatable because they are natural elements and perceived as such, unlike built form. Also, Ms Steven considers that the proposed vegetation will not form a vegetated foreground, and that the buildings will remain a distracting element.³³
51. The viewpoint 5 visualisations 5.1 – 5.3 provide a good representation of what the proposal will look like when entering Wānaka along SH6 from the east. Notably, the photo is focused on the Site not along the road alignment, in which built form to the very right hand side will be outside the primary field of view. Also, that road users are on the far / southern side of SH6 when entering Wānaka, not on the closer side.³⁴
52. As illustrated on the viewpoint 5 visualisations 5.1 – 5.3 the Project *"will appear comparatively low lying at the base of Mount Iron"*³⁵ and *"importantly the proposal, both built form and vegetation will not interfere with views to Mount Iron's more impressive rock outcrops"*³⁶ Also, *"Once the proposed vegetation has matured, it will stand at a similar height to the built form, with the vegetated foreground merging with Mount Iron's backdrop vegetation and nestling the development into the Site."*³⁷ Regarding the use of the term 'merging', I mean this in a way that the proposed boundary planting will provide a vegetated foreground immediately in front of the vegetated backdrop, most notably when the exotic trees are in leaf.
53. With regard to both Ms McManaway's and Ms Steven's comments, I continue to consider that *"Mount Iron will continue to be seen as a large foreboding landscape feature and will continue to have a very strong influence on this area, remaining as a dominant backdrop to the Site."*³⁸

³¹ There are no RM181471 consent conditions that limit additional planting within the Site.

³² Landscape Comment of Elizabeth Anne Steven, above n 8, at [42].

³³ At [44].

³⁴ Queenstown Lakes District Council Landscape Peer Review, above n 10, at [57].

³⁵ Landscape Visual Assessment, above n 4, page 20.

³⁶ Page 20 and 21.

³⁷ Page 20.

³⁸ Page 21.

54. Ms Steven has raised concern regarding nighttime lighting effects, albeit her focus of this concern is as experienced from the Morgan's property. Ms McManaway and Ms Steven does not raise concerns regarding nighttime lighting as experienced from the surrounding public places. The potential nighttime lighting and their subsequent adverse effects were assessed throughout my LAR.
55. With a focus on the potential adverse effects when entering Wānaka from the east, my report stated the following *"At nighttime, standard 8m tall residential streetlights will illuminate the proposed road environment. These lights will be consistent with the streetlights along Junction and Mountain Roads. Noting that the roundabout light is 16m tall, and the state highway streetlights are 12m tall. The proposal will result in additional lighting seen at the foot of Mount Iron, mostly within the western half of the Site. This road environment is already well lit by the existing lighting illuminating the roading infrastructure [as I have experienced when travelling past the Site at nighttime]. Therefore, additional lighting will not be out of place within this environment. Also, any light spill from the proposed streetlights standing 8m high, will be situated behind the 7.7m and 10m tall townhouses, and amenity trees. Therefore, at most it will slightly contribute to reducing Mount Iron's silhouette, that has already been affected by the state highway lighting."*³⁹
56. I agree with both Ms McManaway and Ms Steven that the exotic tree species will not 'merge' with the vegetation patterns on Mount Iron. My comment at the top of LAR Page 41 was focused more on the proposed native vegetation, and the way in which the multiple layers of exotic and native vegetation will provide a vegetated outlook, once mature. Also, the exotic, deciduous tree species will be consistent with what has been consented on Site are consistent with the planting along SH84 and are not uncommon within an urban setting.
57. On review, I found that Ms McManaway's peer review does not appear to fully consider how the consented development will sit in the foreground. This is highlighted by her statement *"I agree that the bulk of the feature will typically remain legible in these views, however, I consider that the built form, experienced in the foreground of and at eye level in close views, will do more than draw the eye, it will change the experience of viewing the entirety of the feature. Where the toe of the landform is obscured by layers of built form, it cuts off the context and coherence of the totality of the feature."*⁴⁰ It's important to highlight that the consented development and any additional planting that may take place will interrupt views to Mount Iron, so it's not expected to see the toe of Mount Iron. Also, whilst both the consented development and Project will screen its toe, the legibility and

³⁹ Page 21.

⁴⁰ Queenstown Lakes District Council Landscape Peer Review, above n 10, at [61].

coherence of Mount Iron stems more from its steeper rock-bluffed faces, skyline and contrast with the surrounding urban development.

58. In summary, I consider that Ms McManaway has overemphasised the importance of the 'closer views' towards Mount Iron along SH84 when travelling away from Mount Iron and SH6 when it is briefly seen in the peripheral view, then lost from view. Also, she has by not adequately considered the consented development and over emphasised the importance of the view to Mount Iron's toe.
59. Overall, these differences highlight why our conclusions differ. I disagree with the additional points raised in Ms McManaway's and Ms Steven's visual effects assessment and therefore, continue to consider that the *"adverse visual effects range from **very low to moderate**, with the most noticeable effects occurring from SH6 when entering Wānaka, SH6 immediately east of the Site, SH84 Balneaves Road and nearby residential properties. However, the proposed landscaping, when mature will adequately mitigate most of these adverse effects in the long-term. Importantly, views to the steep rocky slopes and skyline of Mount Iron will be retained, and Mount Iron will continue to be a prominent feature, as a sentinel at the entrance to Wānaka and will continue to have a very strong influence on this area as the dominant backdrop to the west facing views."*⁴¹

Visual Effect Assessment – Neighbouring Properties

60. Nine comments opposing the Project have been received from the owners and occupiers of 25A, 27, 29 and 29A (one comment), 31, 33, 34, 35 Old Racecourse Road and 21 Head Place. The owners and occupiers of 5 Head Place support the Project.
61. The location of the eight properties opposing the Project are identified on LAR GA Sheet 9 and Figure 1 below, except 21 Head Place because I did not consider that they would have their visual amenity adversely effected by the Project.

⁴¹ Landscape Visual Assessment, above n 4, page 49.



Figure 1: Location of the 25A, 27, 29 and 29A, 31, 33, 34, 35 Old Racecourse Road in relation to the Project. Noting 29 and 29A are legally two properties but have been developed and appear as a single property.

62. The eight submissions opposing the Project raise concern regarding both landscape and visual effects of the Project and the adverse effects on their visual amenity. The exception to this is 21 Head Place, which does not raise concern regarding the visual amenity they gain from their property. Due to this, this section of my evidence focuses on the adverse effects on the amenity gained from the seven Old Racecourse Road properties adjacent to the Site's northwest boundary with the remainder of their landscape related issues being covered off elsewhere in my evidence.
63. Regarding amenity effects, these neighbours have raised similar landscape issues being the building heights, setbacks and density, the loss of privacy, and the subsequent visual amenity effects.
64. As stated in my LAR, I did not access these properties when undertaking my assessment in Section 5.2.11. Rather, it was based on direct site observations, aerial and drone imagery and property information gathered from edocs.govt.nz.
65. On review of these comments, I found that they have not raised any issues that were not traversed in my LAR. This includes Ms Steven's assessment from 33 Old Racecourse Road, except that she has considered the odour from fires (not included in the architecture plans) and noise levels to contribute to adverse amenity effects.

66. Regarding Ms Steven's assessment, I consider that she has overemphasised the primary view from the upstairs window to be in an east/southeast direction. This is because the master bedroom's glass double doors onto the upstairs balcony faces directly north, and only a fleeting view when ascending the stairs is gained. Also, on review of the property file, RM070760 outlines that the hedge along their southeast boundary formed part of the resource consent application, therefore is protected and will screen views of the lower parts of development including reducing nighttime illuminance. Therefore, it can be relied upon for screening purposes. Due to this, I do not resile from the comments and conclusions set out in my LAR, given the conifer hedge is to be maintained in perpetuity.
67. Regarding the other adjacent landowner comments, our difference in opinion stems from how they will individually be affected when compared with my more general assessment.⁴² I cannot disprove how an individual will feel / be affected by the Project. Rather, I have outlined inaccuracies in their justification and reiterate my conclusions.
- (a) The Fitchew Submission raises concern regarding shading.⁴³ The proposal will not shade these properties along Old Racecourse Road. Also, the shade diagrams have been provided in DCM's Design Document illustrate that the Site will not be entirely shaded during the shortest day of the year, with shading starting to occur at the southwestern end just after 12 noon.
 - (b) Numerous submissions raise concern regarding breaches in setbacks. The Project consists of medium and high density residential development. Whilst the underlying zoning will not change, the Project aligns with the PDPs Medium and High Density Residential setback rules being 1.5m.⁴⁴ The proposal breaches the Suburban Residential Zone Rule of 2 m by 260 mm as the proposed buildings are 1.74m from the boundary.⁴⁵
 - (c) Ms Ryan and Mr Johnson's comment states that "*No comparable high-density development exists within a rural or large-lot residential context in the district*".⁴⁶ This is factually incorrect because the high density development within Three Park fronts RL Zoning on the same side and opposite sides of Riverbank Road, and the LLR Zone accessed off Ranch Terrace (beside Puzzling World).
 - (d) The visualisation provided in Mr Casey's comment is inaccurate. It illustrates the proposed townhouses extending into his property, which will not occur.

⁴² The sensitivity of an individual to a proposal will vary based on personal values.

⁴³ Jonathan Fitchew and Janine Fitchew Carroll, Section 53 Comments.

⁴⁴ Queenstown Lakes District Council Proposed District Plan, rule 8.5.9 and 9.5.8.1.

⁴⁵ Rule 7.5.6.

⁴⁶ Gilian Ryan and Scott Johnson, Section 53 Comments.

Mr Casey has not included a methodology on how the visualisation was prepared. Therefore, based on the inaccuracy of building location, it is unclear if any other perimeters are accurate, so I consider that the visualisation over emphasises what will be seen.

68. Based on the above, I continue to consider that the proposal will have a **low to low-moderate degree** of effect on the neighbour's visual amenity for the following reasons. Noting that Ms McManaway's peer review did not raise any concerns with my assessment on these adjacent neighbouring properties.
- (a) Views of open space within the Site are not protected;
 - (b) The outdoor living areas within the future properties will be partly screened by hedging with proposed amenity trees breaking up the visual bulk of built form and situating the development within a treed setting. Noting that the conifer vegetation within 33 Old Racecourse Road can be relied on for screening;
 - (c) In most instances, the proposal is situated to the rear and south / southeast of these properties, outside their primary view to the north away from the Site;
 - (d) The architecturally designed townhouses at a varied range of bulk and scale with attractive façade treatments will be aesthetically appealing; and
 - (e) The potential perception of being overlooked by two-storey townhouses will be mitigated by the north facing windows being set 10m from the boundary, and the north facing windows being associated with a bedroom, not living area. i.e. not an active living space within a dwelling.

Landscape Effects Assessment

69. Ms McManaway and Ms Steven have raised similar landscape issues.
70. Ms McManaway's justification for concluding that the overall landscape effects of the proposal being of a **moderate degree** are traversed in her paragraphs 71 – 77.
71. Ms Steven has bundled her landscape and visual effects assessment under the headings '*Effects on Rural Landscape Character*', '*Urban Form, Urban Growth Boundary and Urban Character*' and '*Effects on Mt Iron ONF*'. I respond to her and Ms McManaway's comments on landscape effects / effects on rural character and effects on Mount Iron below, and I have responded to her Urban Growth comments above in paragraphs 27 – 32 above. I note, Ms Steven has not provided a conclusion

on the degree of adverse effects in her Rural Landscape Character or Urban Growth sections.

72. Regarding both Ms McManaway's Peer Review and Ms Steven's Evidence, I found that they did not raise an issue resulting in adverse landscape effects that were not already considered in my LAR.
73. Ms Steven refers to the comparison I draw with standardised residential zoning. The purpose of this comparison was to highlight an alternative proposal for the Site, not being used as a baseline. Standardised zone was mentioned, rather than a mix of alternative options because it is apparent through the PDP process Council is more in favour of using standardised zones, rather than bespoke zones. This is also the stance taken at a government level through the current RMA reform process.
74. In both instances, Ms McManaway's and Ms Steven's key points of justification stem from the increase amount of built form, a reduction in open space in particular within the PLA and an underlying need to maintain some rural character. This is the fundamental difference in our assessments. I disagree that there is a need to maintain some sort of rural character within the Site, the PLA is not protected in perpetuity, and the UGB line is immaterial to this assessment because the Site is situated within the urban extent of Wānaka. Therefore, I disagree that an increase in development will have a **moderate degree** of effect as concluded by Ms McManaway.
75. Rather, I continue to consider that the proposal will have "*a low to low-moderate degree of adverse effects on the landscape values of the receiving environment, due to the density and bulk of the proposal, mitigated by the comprehensive landscaped development and the way it will align with the peri-urban character and landscape context and [the way in which it will be] contained by the natural landform boundaries that also form the urban extent of Wānaka township.*"⁴⁷
76. Regarding Mount Iron, Ms McManaway agrees "*that the Project will not adversely affect the physical attributes of Mt Iron and that it will remain a dominant feature.*"⁴⁸
77. Also, Ms Steven agrees that "*there would be no effects on the natural character, visual prominence, legibility and memorability of Mt Iron or on the biophysical values.*"⁴⁹ Subsequently adverse effects are on its perceptual values when entering Wānaka from the east are of key concern. I have traversed these issues in my LAR and above, under the heading 'Visual Effects – Public Places'

⁴⁷ Landscape Visual Assessment, above n 4, section 5.3.4, page 43.

⁴⁸ Queenstown Lakes District Council Landscape Peer Review, above n 10, at [87].

⁴⁹ Landscape Comment of Elizabeth Anne Steven, above n 8, at [42].

78. Overall, I continue to consider that, *“whilst the proposed development will have a **very low to moderate degree** of effect on the visual amenity that these road users and residents experience, the proposed development will have a **low to low-moderate** degree of adverse effects on Mount Iron’s high perpetual values as its legibility, visual prominence, memorability, naturalness, and its contrast with surrounding urban areas will remain intact.”*⁵⁰
79. I note that Ms McManaway is correct to point out that my concluding statement bundled potential cultural adverse effects into the associate effects conclusion.⁵¹ This is a small error in the LAR, because I do not have the expertise to conclude such a statement without a cultural assessment or comments from Iwi, neither of which have occurred to date.

CONCLUSION

80. I reinforce the justification and conclusions in my LAR, and continue to consider that:
- (a) The Project will not adversely affect Mount Iron’s physical and associative landscape values,⁵² will have a *low to low-moderate* degree of adverse effects on its perpetual values, and its overall legibility, visual prominence, memorability, naturalness, and its contrast with surrounding urban areas will remain intact.
 - (b) The Project will not adversely affect landscape values related to the Ōrau / Cardrona River, including cultural values.
 - (c) The Project will be in keeping with the peri-urban character and context within the receiving environment (including the consented baseline on the Site) and will be consistent with the pattern of urban development within Wānaka.
81. Overall, the Project will have a *low to low-moderate* degree of adverse effects on the landscape values of the receiving environment, due to the density and bulk of the proposal, mitigated by the comprehensive landscaped development and the way it will align with the peri-urban character and landscape context and contained by the natural landform boundaries that also form the urban extent of Wānaka township.

⁵⁰ Landscape Visual Assessment, above n 4, section 5.3.4, page 43.

⁵¹ Queenstown Lakes District Council Landscape Peer Review, above n 10, at [78].

⁵² Excluding cultural values as no input from Iwi has been provided.

82. Whilst Ms Steven did not provide an overall landscape effects conclusion, Ms McManaway and I agree that the adverse effects of the Project are not significant.

A handwritten signature in black ink, appearing to read 'P. Smith'.

Paul Smith

26 June 2026