

Fast-track – RFI Response 2 – Landscape

Mt Iron Junction Housing Scheme, Wānaka
Fast-track Approvals Act Application

20 July 2026



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1 Introduction

1.1 Background, Purpose and Scope

Rough Milne Mitchell Landscape Architects (**RMM**) has been engaged by Mt Iron Junction Ltd (**the Applicant**) to assess the actual and potential landscape and visual effects of the proposed Mt Iron Junction Housing Scheme. In doing so, RMM prepared a Landscape Assessment Report, dated 17 December 2025 (**the Landscape Report**) that formed part of Mt Iron Junction Fast-track Application.

Since preparing the Landscape Report, I (Paul Smith) prepared a Request for Further Information (**RFI**) Response 1, dated 7 May 2026 that responded to further information sought by Queenstown Lakes District Council (**Council**). Also, I have prepared a Statement of Evidence dated 26 June 2026 that responded to the comments made by the Section 53 parties.

Following receipt of the Statement of Evidence, the Expert Panel prepared Minute 5 RFI, dated 6 July 2026. With regard to landscape matters, the RFI requests design changes to:

- the proposed townhouses and landscaping within the lots adjacent to the Old Racecourse Road neighbours to address the neighbours' concerns about proximity, overlooking and visual impact; and
- the landscape treatment alongside State Highway (**SH**)6 and SH84 to provide a more comprehensive or denser landscape screening.

Figure and Ground Ltd and DCM Urban Design Ltd, with input from the project team have updated the Architecture and Landscape Design Plans, respectively. They have also prepared an RFI response describing the changes that have been made. Therefore, this RFI Response should be read alongside the updated Architecture and Landscape Design Plans and RFI responses prepared by Figure and Ground and DCM Urban.

The purpose of this RFI Response is to respond to the landscape related matters raised in the Expert Panel's RFI. For ease, each RFI question forms the sub-heading, verbatim, with the response below.

2 RFI Response – Landscape Matter 1

2.1 Effects on Old Racecourse Road Neighbours

- i. *In the event that the Panel agrees with the comments and supporting evidence provided by the Old Racecourse Road neighbours relating to their reasonable amenity and privacy, it is not clear what such a response may reasonably entail or require. Indicatively, something in the order of a 3-4m setback along the boundary, with all but 1m from the wall of any dwelling (to maintain access around dwellings and for maintenance) planted in a dense hedge sufficient to reasonably screen the proposed development from view at the ground level of neighbours close to the boundary (perhaps 4-6m in mature height) may be required if the neighbours' concerns are ultimately agreed with. The Panel suggests that such a scale and linearity of vegetation would not be uncommon or inappropriate in rural or semi-rural environments (from the point of view of the neighbours' amenity values and existing land use zoning) and could potentially address at least some of the key concerns expressed to the Panel.*

- ii. *In doing so it is recognised that such a requirement would require amendments to at least some of the house types and locations proposed on the plans, and the Panel would not impose any conditions of consent requiring design changes without having a clear understanding of what those changes are likely to entail. The Applicant is requested to consider this issue and provide to the Panel what in its view would be a 'least-possible-impact' solution to address the neighbours' concerns about proximity and visual impact / overlooking, acknowledging that at this time the Applicant is not volunteering or supportive of such condition or associated changes. This is to help the Panel evaluate the impacts and appropriateness of potential solutions to the issues raised by these adjoining neighbours.*

Supporting Note:

The Panel wishes to signal that this is a key issue before it. If consent were to be granted subject to conditions on this, those conditions need to be fair and reasonable to the interests of the Applicant and adjoining neighbours at Old Racecourse Road. The Panel confirms that depending on the outcome of this matter, a limited hearing with these parties may be required.

2.2

Response

The project team have changed the layout and design of the townhouses, and the landscape design within the proposed lots that are adjacent to the Old Racecourse Road properties and Mount Iron Reserve. The updated townhouse and landscape designs are illustrated on Figure and Grounds Ltd's Mt Iron Junction Architectural Plans, Revision F, dated July 2025, and DCM Urban Design Ltd's Landscape Design Plans, Revision A, dated 16 July 2026 and described in detail in their respective RFI responses. I refer to these plans where necessary.



Figure 1: Proposed townhouse typology adjacent to the Old Racecourse Road properties. Refer to DCM Sheet 7.



Figure 2: Proposed townhouse Typology A and landscape treatment, Refer to DCM Sheet 9. For reference, the previous design is illustrated on DCM Sheet 8.



Figure 3: Proposed townhouse Typology B and landscape treatment, Refer to DCM Sheet 11. For reference, the previous design is illustrated on DCM Sheet 10.

The below landscape response provides a summary description of the design changes, then describes how the design changes collectively address the neighbours' concerns about proximity, overlooking and visual amenity effects.

2.2.1

Design Changes

Townhouse Design Changes:

The layout of the townhouses has been changed.

The 12, two storey, 7.7m tall townhouses within Blocks 12 and 30 adjacent to 29, 31, and 35 Old Racecourse Road have been replaced with single storey 5m tall townhouses. The height / typology of these 12 townhouses has been reduced to address the neighbours' concerns regarding being overlooked and adverse effects on their visual amenity.

The 12, two storey townhouses within Blocks 14 and 32 continue to be proposed along this shared boundary line. These two storey townhouses are located adjacent to 25A, 27, 33 and 34 Old Racecourse Road, where they will be separated by proposed vegetation and mostly situated behind sheds that are located along the southern boundaries of these neighbouring properties.

The setback of the two storey townhouses from their northwest boundary has been increased from 1.8m to 2.8m, refer to **DCM Sheets 10 & 11**. Importantly, it is the single storey, 3m tall section of the two storey townhouses that will be setback 2.8m from the boundary. The two storey, 7.7m tall section of the townhouse will be setback 8.3m from the boundary. The larger setback of the taller built form assists with reducing its visual prominence beyond the boundary fence and planting and subsequently reducing the potential degree of adverse effects on the amenity experienced by these neighbours.

The setback of the single storey townhouses from their northwest boundary has been increased from 1.8m to 2.5m, refer to **DCM Sheets 8 & 9**. Importantly, it is the 3m tall 'lean-to' section of the townhouse is set 2.5m from the boundary. The townhouse's northern façade consisting of a 5m tall gable that descends to gutters at 2.6m tall will be setback 4.3m from the boundary. This setback of the single storey townhouses will assist with reducing the amount of built form seen beyond the boundary fence and planting and subsequently reducing the potential degree of adverse effects on the amenity experienced by these neighbours.

Sliding doors on all townhouses have been removed from the northern facades that are closest to the northwest boundary. The sliding doors have now been designed to face east or west towards each lot's outdoor living space. Also, long, narrow, elevated windows have now been located on the northern façades to provide internal solar gain. The purpose of this internal change is to remedy any potential overlooking effect that may result from the townhouses opening up towards the neighbouring properties.

The single storey townhouse block within the southwest corner of the Site (Block 1) alongside Mount Iron Reserve and SH84 have been replaced with two storey townhouses.¹

Landscape Design Changes:

The number of taller shrubs, and native and exotic trees has increased within the triangular shaped garden bed varying in width between 5.4m and 14m, between 25A Old Racecourse Road and the two storey townhouses within Block 32. **Refer to DCM Sheet 107 and 212.**

¹ This design change will not adversely affect the amenity experienced by owners or occupiers of properties along Old Racecourse Road. The landscape effects of this design change are considered under the below heading 'RFI Response – Landscape Matter 2'.

The amenity tree species originally proposed, included *Sophora microphylla* (small-leaved kōwhai), *Cornus* 'Eddie's White Wonder' (flowering dogwood), *Amelanchier canadensis* (Canadian serviceberry). These tree species have been removed as they are evergreen or have a mature height that does not exceed 6m tall.

The density / spacings of amenity trees alongside the northwest boundary has been updated from one tree spaced every 8m - 12m to spacings of every 3m – 4m, **Refer to DCM Sheets 8 - 11**. Each proposed lot will contain three amenity trees (species listed below), compared with one, as previously proposed.

The proposed boundary trees will consist of:

- *Prunus serrulate* 'Amanogawa' (Japanese Flowering Cherry). This is a narrow, columnar, deciduous tree with green foliage in summer and autumn, pink flowers in spring and bare of leaves through winter. These trees will be planted at 2.5m tall and will stand 6m tall and 3m wide after 10 years growth.
- *Ulmus hollandica* (Lobel) Elm. This is a narrow, columnar deciduous tree with green foliage through spring and summer, orange in autumn and bare of leaves through winter. They will be planted at 2.5m tall and will stand 6m tall and 4m wide after 10 years growth.
- *Acer x freemanii* (Jeffers Red). This is a medium-sized tree with a dense crown, ideal as a specimen tree, with green foliage through spring and summer, reds / oranges through autumn, and bare of leaves through winter. They will be planted at 2.5m tall and will stand 10m tall and 4m wide after 10 years growth.

The three proposed tree species will provide variation to the planting that will be seen along the boundary line and contribute to the backdrop of the Old Racecourse Road properties. The proposed exotic, deciduous boundary trees will be in keeping with the exotic tree species within the neighbouring properties along Old Racecourse Road, and consistent with or similar to the tree species that are consented within the Site. Therefore, I consider that the exotic tree species along this interface are an appropriate design response to assist with resolving the neighbour's concerns and ensuring an adequate level of amenity for future owners / occupiers of the proposed lots.

2.2.2

Visual Amenity Effects Assessment

The below visual effects assessment focuses on the updated design of the proposal. As such, the conclusions reached take into consideration the viewing distance and orientation of the primary view gained from these neighbouring properties, as described in the Landscape Report.

In all instances the entire Site is situated to the southeast and rear of the Old Racecourse Road properties, and proposed development within the Site will not interfere with their northerly aspect, or their west facing views to Mount Iron. Instead, the development will be located within their east facing views to the Grandview Range and south facing views to the Criffel Range. However, permitted activities, including linear rows of planting along this boundary, can achieve the same level of screening. Therefore, these east and south facing views are not anticipated to be protected.

25A Old Racecourse Road

The main outdoor living areas within 25A Old Racecourse Road are located northeast, and on the opposite side of this single-storey dwelling to the Site. The garage, shed, forecourt containing a boat, trailer and caravan park are adjacent to the Site.

The proposed two storey townhouses are setback approximately 15m from the shared property boundary with 25A Old Racecourse Road.

An increase in native and exotic trees consisting of *Fuscospora cliffortioides* (Mountain Beech) and *Plagianthus regius* (Ribbonwood) and increase in native shrubs primarily *Pittosporum tenuifolium* (Kohuhu) and *Olearia paniculata* (Akiraho) has been located within the triangular shaped garden bed varying in width between 5.4m and 14m situated between the proposed two storey townhouses and the forecourt, the rear of a shed and the side of a garage within 25A Old Racecourse Road.

The increase in evergreen trees and shrubs will mature to 12m and 4m tall, respectively and screen the two storey townhouses from view. This vegetation will also mitigate the sense of being overlooked.

The Landscape Report concluded that once the vegetation has matured, the adverse effects experienced from 25A Old Racecourse Road will be of a **low degree**. I consider that the increase in planting will reduce this to a **nil to very-low degree**.

27 Old Racecourse Road

The main outdoor living areas within 27 Old Racecourse Road are located north and east of this single-storey dwelling. Sheds, a 1.8m high solid fence and amenity shrubs and trees line this property's southern boundary.

Two storey townhouses continue to be proposed alongside 27 Old Racecourse Road. This is because there are several sheds located along this property's southern boundary that reduce the outdoor areas within this neighbouring property that may be overlooked or adversely affected by the proposal. However, a sense of being overlooked may remain within this neighbouring property's outdoor lawn and patio area may remain.

The 3m tall section of the two storey townhouses has been setback an additional 1m, totalling 2.8m from 27 Old Racecourse Road. Also, the 7.7m tall two storey section is setback 8.3m from this property, and 24m from their main outdoor living area. The two storey townhouse will be setback behind a 1.8m tall board-and-batten fence, a 1.8m tall *Griselinia littoralis* (broadleaf) hedge and the exotic deciduous trees that will be approximately 7m – 12m when mature.

This staggered setback, with the taller built form setback 8.3m from the boundary and 24m from their main outdoor living area and the planting assists with reducing the townhouses visibility, visual prominence beyond the boundary fence and mitigating the sense of being overlooked. The deciduous trees will provide little screening in the winter, however, pragmatically, outdoor lawn areas are less used during this time, which reduces these potential adverse effects.

The Landscape Report concluded that once the vegetation has matured, the adverse effects experienced from 25A Old Racecourse Road will be of a **low degree**. I consider that the increase in planting will reduce this to **nil to very-low in the summer** and **very-low to low in the winter**. The difference in the degree of adverse effects is due to the deciduous nature of the proposed trees.

29 and 31 Old Racecourse Road

29 and 29A Old Racecourse Road has been developed as a single property. The main outdoor living area is located north of this two-storey dwelling. A secondary patio and outdoor living space is located within the southwest corner of this property. Semi-mature shrubs are located along this property's southern boundary.

The main outdoor living area within 31 Old Racecourse Road is located north, and on the opposite side of this single-storey dwelling to the Site. A garage is located in the southeast corner of this property, with a 1.8m tall solid fence, and 2m tall hedge lining the eastern half of this property's southern boundary.

Single storey (3m – 5m tall) townhouses will be located adjacent to 29 and 31 Old Racecourse Road. These townhouses will be approximately 2.7m – 4.7m lower in height than the previously proposed two storey townhouses, that substantially reduces the amount of built form that will be seen. Also, they will be setback 2.5 – 4.3m from this boundary. Visibility of built form will be further reduced by the increase in exotic, 7m – 12m tall tree species spaced at 3m - 4m centres along the boundary line.

This design response will mitigate the sense of being overlooked, with the removal of any neighbouring two storey townhouses.

The Landscape Report concluded that once the vegetation has matured, the adverse effects experienced from 29 Old Racecourse Road will be of a **low-moderate degree**. And will be of a **low to low-moderate degree** when experienced from 31 Old Racecourse Road. The increase in planting will reduce these adverse effects on visual amenity to **nil to very low in the summer** and **very low to low in the winter**. The difference in the degree of adverse effects is due to the deciduous nature of the proposed trees.

33 Old Racecourse Road

The main outdoor living area is located north, and on the opposite side of this two-storey dwelling to the Site. This property is enclosed on all boundaries by mature, tall hedges and trees. An approximate 4m tall, evergreen, conifer hedge lines the southern boundary that is protected by RM070760.

The conifer hedge can be relied on as a Condition of Consent on the neighbouring property and will screen the majority of the single storey townhouses that are adjacent to the lawn area within this neighbouring property. Also, this hedge will screen the lower parts of the two storey townhouses located behind the shed within 33 Old Racecourse Road.

Two storey townhouses continue to be proposed behind the shed and the consented conifer hedge (RM070760) within 33 Old Racecourse Road. This is because the internal use of the shed will not be overlooked and the shed itself assists with mitigating the potential degree of adverse effects from the driveway area.

The proposed exotic, deciduous trees that will reach 6m – 10m tall that will line the boundary behind the hedge will assist with screening and reducing any potential prominence of these two storey townhouses. Also, they will mitigate the sense of being overlooked. The only issue with these trees, is that they will take longer than all other boundary trees to reach this height because they will be shaded and compete with the conifers.

The Landscape Report did not place weight on the hedge being protected by a condition of consent, concluded that the adverse effects experienced from 33 Old Racecourse Road will be of a **low to low-moderate degree**. When taking the updated proposal and hedge condition into consideration, these adverse effects will be reduced to **nil to very low in the summer** and **very low to low in the winter**. The difference in the degree of adverse effects is due to the deciduous nature of the proposed trees.

34 Old Racecourse Road

The main outdoor living area is located on the northeast side of this single-storey dwelling. The majority of this property's southern boundary is lined with a 20-foot shipping container, shed and gravel trailer park. The eastern end contains a small amount of amenity vegetation, lining the boundary.

The proposed townhouse layout has not changed alongside 34 Old Racecourse Road. One two storey townhouse will be adjacent to the main outdoor living area and single storey townhouses will be adjacent to the remainder of the boundary.

The updated landscape design will assist with visually screening and reducing the prominence of the two storey townhouse, primarily when these trees are in leaf. They will also assist with mitigating the sense of being overlooked from this townhouse. The deciduous trees will provide little screening in the winter, however, pragmatically, outdoor lawn areas are less used during this time, which will reduce these potential adverse effects.

The Landscape Report concluded that once the vegetation has matured, the adverse effects experienced from 34 Old Racecourse Road will be of a **low to low-moderate degree**. I consider that the increase in planting will reduce this to a **low degree in the summer** and it will continue to have adverse effects of a **low to low-moderate degree in the winter**. The difference in the degree of adverse effects is due to the deciduous nature of the proposed trees.

35 Old Racecourse Road

The main outdoor living area is located on the south and western sides of this semi-two storey dwelling. Also, a pathway through their southwest garden bed provides these neighbours direct access to Mount Iron Reserve.

Single storey (3m – 5m tall) townhouses will be located adjacent to 35 Old Racecourse Road. These dwellings will be approximately 2.7m – 4.7m lower in height than the previously proposed two storey townhouses, setback 2.8 – 4m from the boundary line, that substantially reduces the amount of built form that will be seen. Visibility of built form will be further reduced by the increase in exotic, 6m – 10m tall tree species spaced at 3m centres along the boundary line.

When compared with the previous design, the built form's reduced height will remedy these neighbours' concern of being overlooked by future owners and occupiers within the proposed townhouses. Also, the reduction in height, the increase in the setback and additional trees will substantially reduce the amount of built form that will be seen, with the proposed amenity trees providing a vegetated outlook beyond the 1.8m tall fence.

The Landscape Report concluded that once the vegetation has matured, the adverse effects experienced from 35 Old Racecourse Road will be of a **low-moderate degree**. The updated design reduces these adverse effects on visual amenity to **very-low to low degree in the summer** and a **low to low-moderate degree in the winter**. The difference in the degree of adverse effects is due to the deciduous nature of the proposed trees.

Summary

In summary, the updated layout and design of the townhouses, and the landscape design within the proposed lots addresses the neighbours' concerns with regard to being overlooked by removing the two-storey town houses adjoining a main outdoor living area and / or increasing the height of the boundary planting.

Also, the additional proposed boundary trees located within the increased setback area will expand the amount of screening, that will subsequently reduce the visual prominence of the townhouses when experienced by Old Racecourse Road neighbours. This will primarily be during spring, summer and autumn when the trees are in leaf. In the winter, the proposed amenity trees will provide little screening, however, this is during a time of the year when people are less likely to use their outdoor living spaces.

Overall, in all cases, the updated design has resulted in a reduction in the degree of adverse visual amenity effects, that range between **nil to a low-moderate**.

3 RFI Response – Landscape Matter 2

3.1 Landscape treatment along SH6 and SH84

- i. *With reference to the previous comments relating to greater information on potential pedestrian / cycle routes through the Site or around the Site's highway frontages and noting the Panel's agreement that there is sense to a 'through site' public route as has been proposed (subject to the ability to connect pedestrians to any future bus stop location(s), the Panel requests confirmation that the proposed landscape screening around the Site's highway boundaries has been maximised. If there are opportunities to provide more comprehensive or denser landscape screening, the Panel requests an updated landscape plan to this end with an explanation provided of where such additional landscaping could be provided and what it could entail.*

Supporting Notes:

The Panel is not seeking at this time to replace or change the proposed highway frontage landscaping solution, especially if long-term pedestrian / cycle networks remain uncertain and the long-term provision for visual connection and passive surveillance from the Site to the highway frontages is deemed appropriate. The Panel is seeking to understand what highway landscape screening improvements may be appropriate to consider depending on where the broader issue of pedestrian / cycle facilities lands.

3.2 Response

The long-term pedestrian / cycle network will extend through the Site, rather than around the Site along SH84 and SH6, as assessed by the Transport Engineer and Urban Designer. Therefore, passive surveillance from the Site to the highway frontages is not required.

Subsequently, the updated proposal includes an increase in the number and density of native shrubs and exotic amenity trees throughout the garden beds that front SH6 and SH84. Also, larger amenity trees have been placed within the garden beds situated between SH6 and the apartment buildings to increase the layered, screening of these taller buildings.

It is important to highlight that a detailed planting plan along the Site's state highway boundaries were included on **DCM Sheets 201 – 214**. Graphically, only the proposed tree species were individually illustrated on the Masterplan, **DCM Sheets 11 - 13** and on the Landscape Developed Design Plan, **DCM Sheets 101 – 131**. The updated DCM Masterplan and Landscape Developed Design Plans include the proposed tree species and the native, evergreen shrubs that will mature to 3 – 4m tall, refer to **DCM Sheets 201 - 212**. Therefore, whilst there is an increase in planting numbers, this increase is not as substantial as graphically illustrated on the Masterplan and Landscape Developed Design Plans.

The below landscape response provides a summary description of the design changes, then describes how the design changes respond to visual amenity effects.

3.2.1 Design Changes

Landscape Design Changes:

The areas where changes to the planting plans have occurred are highlighted in red boxes on **DCM Sheets 102 – 131A and 201 - 212**. In general, the overall plant numbers remain similar in the updated

design. However, the ratio of trees and taller shrubs has been increased to provide denser screening. Specifically:

- *Plagianthus regius* (Ribbonwood) is a new tree species that has been added to the planting palette. This is a fast growing, semi-deciduous native tree, good for shelter, that has a mature height of 12m tall and 4m wide.
- *Oleria odorata* (Scented Tree Daisy) has been replaced by another native, *Oleria paniculata* (Golden Ake Ake) where garden beds are narrower because it has a taller mature height and will provide more screening.
- The planting strategy for *Olearia paniculata* has changed. They will be planted in groups, as a 12L grade, rather than specimen trees at a 35L grade, to achieve a denser softening / screening effect.
- *Pittosporum tenuifolium* (Kohuhu / Black Matipo) will be planted at a 12L grade, compared with a 2L grade so that they can achieve a denser softening / screening effect within a faster time frame, similar to the *Olearia paniculata*.
- The density of tree planting will be increase by adding more *Fuscospora cliffortioides* (native mountain beech) and generally increasing the density of trees within the boundary plant mix, resulting a reduction in lower lying shrubs.
- The tree species within the internal lot planting near the apart buildings have changed. This includes replacing *Cornus* 'Eddie's White Wonder' (flowering dogwood) that has a mature height of 5m with *Pyrus calleryana* 'Aristocrat' that has a mature height of 10m. The density of trees within the garden beds between the townhouses and the boundary planting alongside the state highway has also been increased.
- An increase in native and exotic trees consisting of *Fuscospora cliffortioides* (Mountain Beech) and *Plagianthus regius* (Ribbonwood) and increase in native shrubs primarily *Pittosporum tenuifolium* (Kohuhu) and *Olearia paniculata* (Akiraho) has occurred within the triangular shaped garden bed approximately 15m wide between SH84 and Block 1. The increase in evergreen trees and shrubs will mature to 12m and 4m tall, respectively and screen the two storey townhouses from view.

The increase in visual screening provided by the updated boundary state highway treatment is illustrated when comparing the visualisations prepared by DCM in their Section 53 Response, dated 25 June 2026 and the updated visualisations dated 16 July 2026. Noting:

- Visualisation 1 – SH6: Additional screening of the southernmost apartment building and the majority of the service station will be screened when entering Wānaka from the east, along SH6.
- Visualisation 2 – SH84: The lower half of all townhouses will be screened from view when travelling past the Site along SH84. In some instances, the more than three-quarters of the townhouses will be screened.
- Visualisation 3 – SH6: The majority of the two storey townhouses will be screened from view es when travelling past the Site along SH6.
- Visualisation 4 – Riverbank Road: Additional screening of the southernmost apartment building and the majority of the service station will be screened from Riverbank Road.
- Visualisation 5 – SH6: The taller amenity trees will stand at a similar height as the apartment buildings, that will assist with settling them into the Site.

3.2.2 Visual Amenity Effects Assessment

When compared with the original design, the proposed landscape treatment will increase the amount of visual screening provided, and reducing the amount of built seen from SH84, SH6 and beyond. The increase in native shrubs and their larger grade at planting will expediate their screening effect, in particular screening visual clutter that typically accompanies ground level activities.

The majority of the residential development will stand less than 8m tall, including the two storey townhouses that are now proposed within Block 1. Therefore, when these trees mature, they will be well screened and visually separated from state highway road users, in which built form will only slightly detract from Mount Iron's prominent and distinctive landform and skyline at the entrance in Wānaka. The built form, in particular its bulk and density may draw the eye, however, Mount Iron will continue to be seen as a large significant landscape feature and will continue to have a very strong influence on this area and will remain as a dominant backdrop to the Site.

Overall, the updated planting design will result in an increase in visual screening of the proposed development from SH6 and SH84. However, this increase in screening is inconsequential to the overall assessment of visual effects, which will continue to be of a **low-moderate to moderate degree**.