

IN THE MATTER of the Resource Management Act 1991(RMA)

AND

IN THE MATTER of Ayrburn Screen Hub (the Project)

JOINT WITNESS STATEMENT (JWS) IN RELATION TO:

Topic: Ayrburn Screen Hub – FTAA-2508-1093

Date: 16 January 2026

Expert Conferencing Held on:	13 January 2026
Venue:	Via a video conference
Independent Facilitator:	There was no independent facilitator required.
Admin Support:	There was no administrative support required.

1 Attendance:

- 1.1 The list of participants is included in the schedule at the end of this Joint Witness Statement (**JWS**).
- 1.2 There are no conflicts of interest for the experts.

2 Basis of Attendance and Environment Court Practice Note 2023

- 2.1 All participants agree to the following:
 - (a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
 - (b) They will comply with the relevant provisions of the Environment Court Practice Note 2023;
 - (c) They will make themselves available to appear before the Panel;

- (d) This statement is to be filed with the Panel and posted on the EPA's website.

3 Matters considered at Conferencing – Agenda and Outcomes

- 3.1 Following Minute 6 (dated 18 December 2025) of the Expert Panel, the purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement in relation to landscape issues relating to the Ayrburn Screen Hub Fast Track Application.
- 3.2 **Attachment A** sets out Mr Milne's Supplementary Assessment Memo dated 9 January 2026, that should be read together with the JWS.
- 3.3 This Supplementary Assessment Memo relates to matters raised in the Ayrburn Screen Hub - Landscape Peer Review prepared for Queenstown Lakes District Council by Bridget Gilbert, dated 4 December 2025 - (FTAA-2508-1093). This memo also comments on matters raised in the evidence of Rebecca Hadley (**RH**), as directed by the Panel. This memo also responds to comments of Jan Andersson, and the comments of Greg and Lianne Collins (both neighbours to the application) which raise concerns about the effects on views from their properties.
- 3.4 The following records the agreed issues, areas of disagreement and the reasons, along with any reservations.

4 Existing Landscape Values

- 4.1 **Legible defensible edge**
 - (a) **TM** and **BG** agree there is no legible defensible edge between the proposed built development area and the Ayrburn hospitality precinct in the Waterfall Park Zone (**WPZ**).
- 4.2 **Existing semi-rural industrial character**
 - (a) **TM** and **BG** agree that much of the site currently displays a semi-rural industrial character and that this is a short-term condition.
 - (b) **BG** agrees with **RH** that this should not detract from the landscape values of the site.

4.3 Landscape Values Contributing to the ‘Sense of Place’ of the Site and Receiving Environment

- (a) **TM** and **BG** agree with the description of the ‘sense of place’ dimensions of associative values in paragraphs 4.13 to 4.21 of the report prepared by **BG**.
- (b) **TM** considers that while he may not use the specific word’s identity or sense of place, there are many references to the landscape elements and values that contribute to ‘sense of place’ throughout his original assessment (**RMM LAR**) and particularly at section 4.3 of the RMM LAR.
- (c) **BG** disagrees with comment (b) and agrees with **RH** that the RMM LAR and RMM Addendum have not addressed the full spectrum of existing landscape values.

4.4 Cultural Impact Assessment

- (a) **TM** and **BG** have no points of disagreement in relation to this matter.

4.5 Summary of Existing Landscape Values

	TM	BG	RH
Physical Values	Site: moderate Receiving Env: high	Site and local area: moderate	Overall: considers TM rating of low-moderate to be underestimated.
Perceptual Values	Site: low-moderate Receiving Env: moderate-high	Site and local area: moderate-high	
Associative Values	Site: low-moderate Receiving Env: moderate	Site and local area: moderate-high	

5 Proposed Development

5.1 Character of the Proposed Development

- (a) **TM** and **BG** agree that the proposed development comprises ‘urban development’ in a rural setting.
- (b) **RH** describes the development as ‘industrial’. **BG** agrees that the large studio buildings accord with an industrial character, although considers that collectively, the development is best described as ‘urban’ given the proposed mix of uses and building forms.

- (c) **TM** acknowledges the scale of the studio buildings accord with an industrial character, but also considers that the large studio buildings, in terms of scale and materiality also reflect an agricultural shed. **BG** disagrees with the relevance of the characterisation of the studio buildings in this way for the reasons set out at paragraph 5.24 of her report.
- (d) **BG** agrees with **RH** that the development cannot be described as a cluster of buildings for the reasons set out at paragraph 4.25 of her report.
- (e) **TM** remains of the view that the development will form a village-like character.

5.2 Engineered Batter Planting Stability and Effectiveness of Mitigation

- (a) **TM** supplied **BG** with a copy of the DRAFT Geosolve Memo dated 15 December 2024 (**Geosolve Memo**) during the conferencing, which she understands will form part of the Applicant’s Response to Comments (due on 14 January 2026).
- (b) **BG** confirms that this information provides confidence that the proposed slope stabilisation options available, will allow for the proposed planting strategy to be implemented. Given that the Geosolve Memo is a draft only, **BG** reserves the right to comment on any changes in the Final version of the Geosolve Memo should they impact on the viability of the mitigation planting.

6 Landscape Effects

6.1 Visual Simulation Photographs

- (a) **TM** and **BG** agree that the 16mm photographs provide context only.

6.2 Countryside Trail/Te Araroa Trail Visual Amenity Effects

Viewpoint	TM	BG
8	2-3 years: low-moderate ('minor'). After that: low ('less than minor')	Up to 5 years (short term): moderate-high ('more than minor' but not 'significant') 5 years (medium term): moderate-low ('minor') 10 years (long term): low ('less than minor')

Viewpoint	TM	BG
5-7	Up to 5 years: moderate ('more than minor'). 5 years and beyond: low-moderate ('minor')	Up to 5 years (short term): moderate-high ('more than minor' but not 'significant') 5 years (medium term): moderate-low ('minor') 10 years (long term): low ('less than minor')

- (a) **BG** considers that **TM** has misinterpreted **BG**'s comments in this regard. **BG** did not say that Viewpoints 6 and 7 are not relevant. Rather she advised that she had assessed them because **TM** had considered them relevant.
- (b) In considering this matter, **BG** and **TM** note that the Panel may choose to only approve some parts of the development, which may, in turn, lead to the omission of the trail relocation given the substantial cost and limited development benefit of that work to the applicant. For those reasons, **BG** and **TM** consider it appropriate to include the consideration of effects in relation to Viewpoints 6 and 7.

6.3 Trail viewing audience sensitivity

- (a) **TM** and **BG** agree that the section of trail relevant to the development is a sensitive location.
- (b) **BG** considers recreational trail users as generally being a more sensitive viewing audience whereas **TM** considers that the trail users will have varying sensitivity to development change.
- (c) **BG** considers that some of the comments expressed by **TM** in his Supplementary Report on this matter are unsubstantiated by evidence (for example **TM**'s identification of three trail user group typologies) and appear to be beyond the scope of landscape expertise or of questionable relevance. **TM** acknowledges that he has not undertaken any research of trail users but reiterates the point he was making in his Supplementary Report that he anticipates that the sensitivity of users will vary and one cannot label them all as '*a more sensitive viewing audience*'.

6.4 Other views

BG and **TM** do not share the concern expressed by **RH** with respect to views from:

- (a) Arrowtown Lake Hayes Road, due to the filtering influence of (protected) mature trees and consented but unbuilt development in the Ayrburn Structure Plan Residential Activity Area on Ayr Avenue.
- (b) Tobins Track, due to diminishing influence of distance and the visual complexity of the Ayrburn site more generally as perceived from this orientation, as a consequence of the vegetation features and patterns.

6.5 Moderating influence of spatial arrangement of built development and OSA encroachment

- (a) **TM** and **BG** agree that only a relatively small portion of the OSA (approximately 1.5ha) is impacted, with that area of OSA having a relatively low visual profile excepting in relation to views from the Countryside Trail/Te Araroa. However, **TM** considers that views of that area of OSA from the Countywide Trail/Te Araroa are limited due to landform.
- (b) **BG** remains of the view that the urban development character of the intrusion, along with the urban character of development proposed within the RAA adjacent, serve to diminish the scale of OSA intrusion as providing a moderating influence with respect to landscape effects.

6.6 Moderating influence of agricultural buildings

- (a) **TM** and **BG** disagree that the character of the proposed studio buildings as being similar to rural buildings (such as a woolshed or covered feed stands), provides a moderating influence with respect to landscape effects.
- (b) **BG** addresses her reasons in this regard at paragraph 5.24 of her report. She notes that no comment on this matter is provided in **TM's** Supplementary Report. **TM** reiterates his position that while the size of the proposed studio buildings will be bigger than most built form experienced in this landscape, they do however relate to larger agricultural buildings that are familiar within the wider landscape.

6.7 Landform Effects

- (a) **TM** and **BG** disagree with respect to the adverse effects associated with the proposed spur landform. **BG's** reasons in this regard are set out at paragraphs

5.25 to 5.29 of her report. **TM**'s reasons in this regard are set out at paragraph 6.1.3 of the RMM LAR and at page's 7 and 8 of his Supplementary Memo.

- (b) **BG** agrees with **RH** that:
- i. The proposed landform is: an unnatural landform in this context; will obscure views from the trail to open space areas and the associated impression of breathing space; and will detract from legibility and expressiveness values associated with the original glacial geomorphological processes that shaped the valley and its sides (i.e. the Wharehuanui Hills).*
 - ii. The sheer scale of the new landform (and mitigation planting) required to 'cocoon' or 'hide' the development speaks to its inappropriate location, scale, and character.*
 - iii. The proposed new landform (as a mitigation measure) generates adverse landscape effects in its own right.*
- (c) **BG** is not as concerned as **RH** that the vegetation will read as incongruous due to the intended riparian planting context which will introduce complexity along with the approach emerging in other parts of the basin to retire and plant steeper slopes (e.g. reserve land in Slope Hill valley). **TM** shares the same position as **BG** on this matter.
- (d) **TM** disagrees with (b) above and considers the proposed landform at the broader Speargrass Flats scale, due to its relatively small and contained scale, maintains the legibility and expressiveness values associated with the Wharehuanui Hills landform.

6.8 Visual Effects as a proxy for landscape effects

- (a) **BG** remains of the view that **TM** has relied on his visual effects analysis as a proxy for a landscape effects assessment. (Refer **BG** report, paragraph 5.30). **TM** remains of the view that the assessment of effects is appropriately tailored to focus on the matters identified from the PDP and is consistent with Te Tangi a te Manu.
- (b) **BG** considers that **TM**'s comments in his Supplementary Report reinforce this impression (refer **TM** Supplementary Report bottom of page 8 and top of page 9), with its repeated reference to the key relevant matters being how we 'visually experience' a place/development/landscape etc.

- (c) **BG** also considers that **TM** has introduced his own, in her view, incorrect, test for landscape effects in his Supplementary Report, where he states, *“It is important to remember that whether the proposal is considered appropriate is determined by the visual effects on the receiving environment and whether the landscape values attributed to this setting are retained or whether, if adversely affected, effects can be satisfactorily avoided, remedied or mitigated”*.
- (d) In contrast, it is **BG**'s understanding that:
- i. under TTatM, the fundamental test is effects on landscape values (embracing the three dimensions of physical, perceptual, and associative values).
 - ii. In the specific context of the site and local area, which is an RMA s7(c) landscape, the relevant landscape test is whether the development will maintain or enhance the landscape character and visual amenity values of the site and local area.
- (e) Put another way, it is **BG**'s interpretation that applying the approach used by **TM**, as long as a new urban development in a rural zone is screened from view and complements the existing adjacent urban development character, it is appropriate from a landscape effects perspective.
- (f) **TM** disagrees with **BG**'s comments at (b), (c) and (e) above. **TM** agrees that the landscape values embrace physical, perceptual and associative dimensions and that associative dimensions are not experienced in a visual sense. The physical and perceptual attributes of the landscape are predominantly experienced visually, although consideration is also given to other matters such as natural science, and other senses. **TM** remains of the opinion the assessment is appropriately focused, the reason for this is how the proposal is perceived will have the greatest influence on its overall effect on landscape character.

6.9 Effects in relation to associative dimension of landscape values: Identity/Sense of Place

- (a) **TM** and **BG** disagree with respect to effects in relation to this dimension of landscape values.
- (b) **BG** remains of the view set out in paragraphs 5.31 to 5.33 of her report. **TM** remains of the view as set out at 4.3 (b) above.

- (c) **BG** agrees with **RH**:
 - i. The largest of the proposed buildings are located in the OSA which is identified in the PDP to have a **low** landscape capacity.
 - ii. The development will undermine the impression of the Ayrburn precinct heritage buildings (in WPZ) as a cluster surrounded by open space.
- (d) **TM** remains of the view that the proposed development will complement the Ayrburn precinct buildings, reading as an integrated and comprehensive extension to the existing and evolving character of the Ayrburn Precinct. In response to (c) above **TM** notes that while the largest of the proposed buildings are located in the OSA, they are on the periphery of the OSA.

6.10 OSA function

- (a) **BG** considers that in **TM**'s Supplementary Report comments with respect to the role and relationship of the OSA to its setting, **TM** continues to overlook the relationship of the OSA to the ASP RAA and WBLP. **BG** considers this to be important for the reasons set out in paragraphs 4.14 to 4.17 and 5.22 and 5.23 of her report. **TM** disagrees with this for the reasons set out at Page 9 of his Supplementary Memo.
- (b) **BG** also considers **TM**'s Supplementary Report comment: "*Furthermore, I find the proposal is consistent with the spatial patterning that sees nodes of rural living development interspersed with 'breathing space'*" to be incorrect, given that the proposed development is urban development rather than rural living development. (**BG** emphasis added.)
- (c) Acknowledging the proposal is urban development, **TM** still considers the proposal is consistent with the principle of spatial patterning of nodes interspersed with 'breathing space'. Although it is urban development it is limited and very much confined.

6.11 LCU 8 comments

- (a) **BG** considers that **TM**'s Supplementary Report comments that LCU 8 is quite broad-brush and that much of Ayrburn is different from the rest of the LCU is incorrect (for example, the pinch point further to the west on Speargrass Flat Road and far western end of LCU8). **BG** is of the view that the valley character is variable in terms of scale/width and vegetation complexity. **TM** agrees the

valley character is variable but maintains the Ayrburn setting has elements that contribute to a different character in comparison to the balance of LCU8.

- (b) **TM** and **BG** disagree with respect to the LCU8 characteristics and values that will be affected by the proposed development. **BG** remains of the view set out in paragraph 5.36 of her report. **TM** does not comment on these matters in his Supplementary Report and remains of the view as set out in the RMM LAR and 18 November 2025 Addendum.

6.12 Cumulative effects

- (a) **TM** and **BG** confirm that it is their understanding that a Council needs to administer their district plan in a consistent manner.
- (b) **TM** disagrees with **BG** that there is a risk of a tipping point emerging in the future were the consent to be granted, as he considers that would depend on the application being considered.
- (c) **TM** acknowledges that he has not considered this matter in light of the broader Basin as he has considered the application on its own merit. **TM** remains of the view set out at page 9 of his Supplementary Memo.
- (d) **BG** remains of the view set out in paragraphs 5.39 and 5.40 of her report.

6.13 Summary of Landscape Effects

TM: low to low-moderate. ('less than minor' to 'minor')

RH: high ('more than minor' and 'significant')

BG: moderate to moderate-high ('more than minor' but not 'significant')

- (a) **BG** has found it difficult to reconcile **TM**'s findings with respect to landscape effects of the screen hub when compared to his landscape effects conclusions for the (consented) Ayrburn Flower Farm development, directly adjacent the proposed screen hub area.
- (b) The Ayrburn Flower Farm application (RM 250135) relates to a non-complying activity for three very modestly scaled, rural sheds (to accommodate small-scale commercial uses - hairdresser, gift shop etc.) by the existing glasshouses/ornamental gardens on Ayr Avenue, near the existing Ayrburn carpark.

- (c) **TM**'s landscape effects conclusions for the Ayrburn Flower Farm application in relation to the "wider site and receiving environment" [*which includes the screen hub site*] were rated as **very low** ('less than minor').
- (d) In **BG**'s opinion, it is difficult to see how urban development of rural zoned land, of the scale and extent contemplated by the proposed screen hub generates very similar adverse landscape effects as three modestly scaled, rural sheds:
 - TM** Ayrburn Screen Hub landscape effects: **low** to **low-moderate**. ('less than minor' to 'minor')
 - TM** Ayrburn Flower Farm landscape effects: **very low** ('less than minor').
- (e) **TM** considers he has assessed each application, and it's supporting material, consistently and that is why he has concluded adverse landscape effects for each application will be different.

7 Proposed Conditions of Consent

- 7.1 **TM** and **BG** are in agreement with respect to the proposed landscape related conditions recommended in **BG**'s report.

8 Effects on Immediate Neighbours

- 8.1 **BG** and **TM** have not visited the submitter's properties.

Jan Andersson, [REDACTED]

- 8.2 **BG** does not consider that the Google Earth model views provided in **TM**'s Supplementary Report form a reliable basis for effects conclusions in relation to the neighbours' properties.
- 8.3 **TM** considers the model views to be accurate, as these have incorporated the modelling previously prepared for the proposal, to the extent to assist with his comments on effects in relation to the neighbours' properties. **TM** reiterates that in his Supplementary Memo he has also relied on his own familiarity of this boundary interface.
- 8.4 For completeness, **BG** has visited [REDACTED] (in relation to a peer review for a resource consent application on that property) and notes that a reasonable proportion of the screen hub site is visible from that property.

- 8.5 Relying on her familiarity with that outlook, and careful review of aerial photography with contours (including Figure 1 in her report) and the application plans, it is **BG**'s expectation adverse visual effects in relation to dwellings along the Millvista Lane ridgeline will be similar to that described for Viewpoint 5 (from the trail, and cross referencing to the reasoning set out at paragraph 5.17 of her report), excepting that as one moves eastwards along the ridge, the mitigation benefits of the proposed spur landform and planting will lessen. However, this is 'balanced' by the increased screening influence of the existing foreground landform. Overall, adverse visual amenity effects in relation to the Millvista Lane properties are expected to rate as **moderate-high** ('more than minor' but not 'significant') in the short term, reducing to **moderate - low** ('minor') after 5 years, and **low** ('less than minor') in the long term (10 years and beyond). **BG** considers that her landscape effects comments and conclusions address the broader matters addressed in the neighbour's comments with respect to loss of rural character and cumulative effects.
- 8.6 **TM** agrees with **BG** in that his expectation of adverse visual effects in relation to the Anderson property will be similar to that as he assessed for Viewpoint 5 (refer 6.2 above), noting this does not change his comments on Pages 12 and 15 of his Supplementary Memo.

Collins Property, [REDACTED]

- 8.7 While **BG** has not visited this property, like **TM**, she has walked and photographed the public bike and walking track along this southern edge of Ayrburn and adjacent to the Collins property. She has also carefully reviewed aerial photography with contours and the applications plans in coming to her conclusions on landscape related matters raised in the neighbour's comments (effects on dark night sky environment).
- 8.8 In **BG**'s opinion, the existing boundary vegetation or proposed replacement planting (by side agreement with the relevant landowner) will ensure such effects are appropriately managed.

9 PARTICIPANTS TO JOINT WITNESS STATEMENT

- 9.1 The participants to this Joint Witness Statement, as listed below, confirm that:
- (a) They agree that the basis of their participation and the outcome(s) of the expert conferencing are as recorded in this Joint Witness Statement; and

- (b) They agree to the introduction of the attached information – Refer to paragraph 3.1 above; and
- (c) They have read the Environment Court’s Practice Note 2023 and agree to comply with it; and
- (d) The matters addressed in this statement are within their area of expertise; and
- (e) As this session was held both in-person and online, in the interests of efficiency, it was agreed that each expert would verbally confirm their position in relation to this para 4.1 to the Independent Facilitator and the other experts and this is recorded in the schedule below.

Confirmed: 13 January 2026

EXPERT’S NAME & EXPERTISE	PARTY	EXPERT’S CONFIRMATION REFER PARA 4.1
Bridget Gilbert (BG)	Queenstown Lakes District Council	Yes
Tony Milne (TM)	Waterfall Park Developments Ltd (The Applicant)	Yes



Bridget Gilbert



Tony Milne

Supplementary Landscape Assessment Memo

Proposed Ayrburn Screen Hub
1 Ayr Avenue, Arrowtown

9 January 2026



1 Introduction

1.1 Purpose

This Supplementary Assessment Memo relates to matters raised in the Ayrburn Screen Hub - Landscape Peer Review prepared for Queenstown Lakes District Council by Bridget Gilbert, dated 4 December 2025 - (FTAA-2508-1093), This memo also comments on matters raised in the evidence of Rebecca Hadley, as directed by the Panel. This memo also responds to comments of Jan Andersson¹, and the comments of Greg and Lianne Collins² which raise concerns about the effects on views from their properties. I have structured my memo by responding to Ms Gilbert's comments first, followed by my response to Rebecca Hadley and then I address the effects on those neighbours. I draw the Panel's attention to the fact that a number of my responses to Ms Gilbert's report, can be taken as addressing the same concerns raised in the Hadley, Andersson and Collins comments.

While Ms Gilbert and I are in general agreement on most matters and fundamentally are 'not too far apart' in the conclusions reached³, there are several matters of disagreement and/or errors that I comment on following.

For ease of understanding, I set out each of these as headings and reference the paragraph numbering within Ms Gilbert's report, with my response following. There are several recurring themes running through Ms Gilbert's report, therefore, to avoid repetition I have identified these and grouped my responses accordingly.

I note that in Ms Gilbert's report, there appears to be a duplication in numbering within Section 4. The numbering following 4.25 reverts to 4.1 through to 4.6. To save confusion I use italics when referring to 4.1 – 4.6, when used a second time around.

¹ Comments of Jan Andersson, [REDACTED], dated 17 December 2025

² Comments of Greg and Lianne Collins, [REDACTED], dated 16 December 2025

³ Landscape Peer Review – Page 4, Paragraphs 2.6 and 2.7

2 Additional Commentary

The Evidence of Bridget Gilbert

2.1 Semi – Rural Industrial Type Character

At [2.2a] Ms Gilbert refers to *‘the semi – rural – industrial type character of much of the flat land within the site’*⁴ and notes that this includes small-scale portable offices, carparking for the Ayrburn staff and construction workers, spoil heaps and equipment/machinery storage areas. I agree that this forms part of the Site and as such contributes to the existing character, and in fact denudes it to a certain extent. However, I consider this to be a temporary condition that is associated with the development of Ayrburn, rather than a lasting contributor to the sense of place.

2.2 Identity or Sense of Place

Ms Gilbert makes several comments (refer [2.2 b) i], 2.9 a, 4.9, 4.12, 4.13, 4.19, 5.32, 5.36 and 5.41]) in relation to the *‘identity’ or ‘sense of place’ dimensions of associative (landscape) values articulated via a deliberate spatial and planning strategy (via the Ayrburn Structure Plan)*. In considering this and the elements of ‘spaciousness’, ‘openness’ and ‘ruralness’, I refer to Figure 1 below that graphically shows that only 1.5ha of land within and at the edge of the Open Space (OS) area of the Site will be built on.

The Ayrburn Structure Plan (ASP) identifies extensive OS areas located within the Site. The significant majority of those OS areas are being retained and protected as OS, with consequential retention of the relevant OS values as experienced from both within the Site and from those areas beyond the Site where views are afforded. The loss of OS values will only apply to that part of the proposal located outside the RAA, which as shown in Figure 1 is a relatively (in the context of the overall OS area) small area of 1.5ha in size and located at the toe of Christines Hill.

When one ‘steps back’⁵ and considers the continuous spatial patterning of the land to both the east and west, I acknowledge that there will be a relatively small loss of spaciousness, openness and ruralness, but cannot see how such a small (in terms of area) intrusion into the OS will adversely affect these sensory elements, and the ‘spatial approach articulated in the District Plan, both at a landscape unit and Ayrburn Structure Plan scale’, to the extent claimed by Ms Gilbert.

It is my understanding that the OS area as shown on the ASP is intended to provide an appropriate interface between development in the ASP and adjacent zones - particularly the Millbrook Resort Zone (MRZ) and the Waterfall Park Zone (WPZ). In my opinion this is retained in a meaningful way and does not erode the deliberate approach as per the PDP provisions.

⁴ Landscape Peer Review – Page 3, Paragraph 2.2 (a)

⁵ I refer you to Figure 1 at Page 17 in the Landscape Peer Review

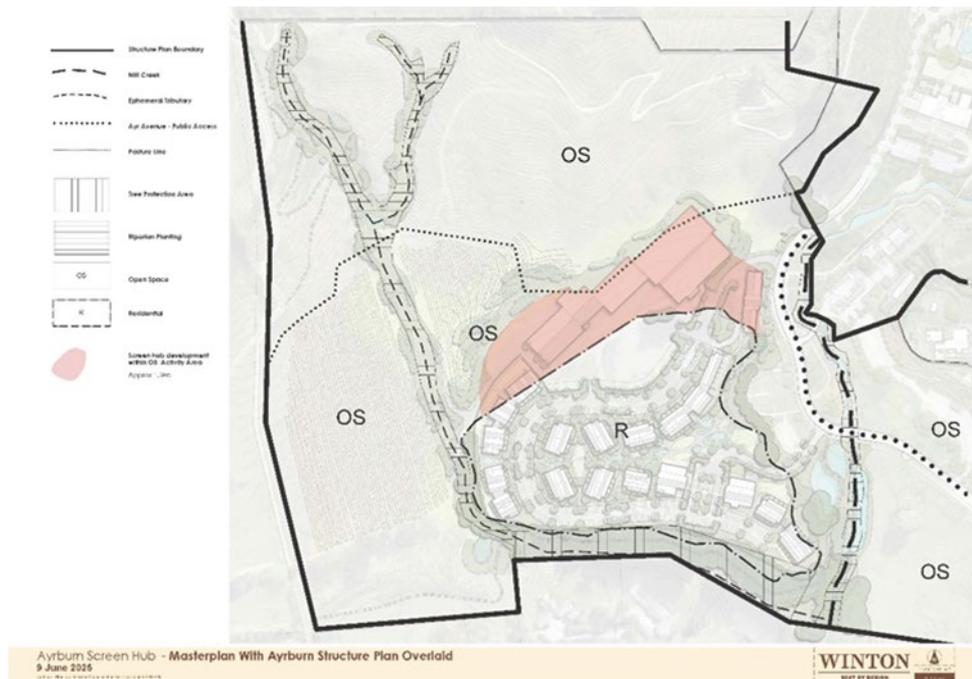


Figure 1. Masterplan with Ayrburn Structure Plan Overlaid

Furthermore, I find the proposal is consistent with the spatial patterning that sees nodes of rural living development interspersed with ‘breathing space’. This is primarily because it is physically and visually contained, is proximate to the WPZ, is part of an evolving Ayrburn character and when viewed from beyond the Site is seen in the context of the adjacent relatively intensive rural residential development and therefore a ‘node’ with the pastoral landscape of Speargrass valley to the east and west.

I also acknowledge that LCU8⁶ is quite ‘broad brush’, with much of Ayrburn different from the wider valley / flats because of the way in which it is enclosed, both physically and visually, by Christines Hill to the north and the Lake Hayes lifestyle development to the south. As a result, much of the ‘openness’, ‘high visibility from the road network’ and ‘open and spacious pastoral outlook’ of LCU8 that is referred to in Schedule 24.8 has quite limited application to the majority of Ayrburn.

And further to that, this will be maintained with the proposal not impinging on those areas of LCU8 that display relatively simple and cohesive pasture covered slopes with rural character, at the same time maintaining the role the Speargrass Flats play as a breathing space between nodes of development.

2.3 Engineered Batter Planting Stability

In response to Ms Gilbert’s comments at [2.3 and 4.2] I refer to the Geosolve – Engineered Batter Planting Stability Memo, Ayrburn Screen Hub, Arrowtown dated 19 December 2025, that forms part of applicant’s response to the Landscape Peer Review. Having reviewed the memo, I am satisfied that the mitigation planting as proposed can be planted and will be able to establish as anticipated and therefore my previous assessment of effects that considers this planting remains unchanged.

⁶ LCU8 - PDP Schedule 24.8 LCU 8 Speargrass Flat

2.4 Potential Discrepancy between the Appendix 20 Depth Contour Plan and the Existing Contours Plan/Proposed Contour Overlay Plan

In response to Ms Gilbert's comments at [2.4] I have reviewed the *Patersons Ayrburn Screen Hub Consent Drawings – Sheet 200 Existing Contour Plan, Rev B 18/7/2025*. I understand that the only change is the depth contours shown at the top of the spur that had somehow been hidden by a drawing layer/string within the drawing itself (a technical computer aided draughting issue) and the earthworks quantities had already picked this up so there is no substantive change required (although Sheet 200 should be corrected as included with the applicant's response).

2.5 Cultural Impact Assessment

In response to Ms Gilbert's comments at [4.8] regarding the cultural values of landscape values, at the time of writing the Landscape Assessment Report, I did not have either the Draft or Final Cultural Impact Assessment (CIA)⁷ and therefore could not comment on it. I have since been furnished with the Final CIA and have now read it and it does not change my opinion. I note at [4.10] Ms Gilbert provides a quote from the CIS that summarises the existing cultural landscape values associated with the Site and local area. This accords with my understanding.

Further to that it is also my understanding that Ngāi Tahu are supportive of the application and have not raised any specific cultural landscape related issues.

2.6 16mm Visual Simulation Photographs

In response to Ms Gilbert's comments at [5.7 – 5.9] regarding the 16mm visual simulation photographs, I refer also to the OTOH visual simulation methodology, and in particular the instruction on viewing the visual simulations, that was appended to the RMM Landscape Assessment Report.

While I agree with Ms Gilbert that 50mm photographs convey a fair representation of the human view experienced from the relevant vantage points, I also point out that the printed size of an image is independent of the focal length of the camera lens. Focal length does not alter the perspective of the image. The main difference that various focal lengths make is to change the extent of the image captured. In other words, camera lenses of different focal lengths create images with different fields of view.

None of these fields of view (**FOV**) are the same as the human field of view and therefore that is why a picture taken with a "non-human" receptor such as a camera does not represent what we actually see. Consequently, and as per the NZILA Best Practice Guidelines, it is important to remember that while visual simulations are very useful tools to assist in the assessment and decision-making processes they are not "real life views".

Visual Simulations are always supplied with a 50mm lens to replicate the human eye because this is stipulated in the NZILA guidelines - which is exactly what has been done. The problem with the 50mm simulations is that they don't show context as that lens doesn't have the FOV that the human eye does. For this reason, a 16mm wide angle simulation is also used to provide the context that the human eye sees. The 50mm and 16mm work together to mimic the whole human experience. The 50mm simulation gives a sense of proximity; the 16mm delivers the human eye FOV.

⁷ Final Cultural Impact Assessment, prepared by Te Ao Mārama Inc, dated July 2025.

In regard to Ms Gilbert's comments regarding '*wide angled shots that have the effect of making the centre of the image look much further away than it is in reality*', it is noted on the sheets that the 16mm is 'For context only' but the same technique/methodology as the 50mm simulation has been applied. Therefore, this should be accepted as accurate by Ms Gilbert. The only thing actually changing is the FOV of the camera in the 3D scene. It is acknowledged that 16mm lenses do have some distortion at the edge of the frame, but this is accounted for in the 3D software, so the simulation matches the photo perfectly.

It is in this context that both the 16mm and 50mm visual simulations have been used to guide the assessment undertaken.

2.7 Viewing Audiences

In response to Ms Gilbert's comments at [5.1 – 5.4] regarding viewing audiences and the assessment of effects from locations that are currently on public land but are intended to be relocated in due course (Viewpoint 6) and correspond to existing trail vantage points on private land (Viewpoint 7), I agree with Ms Gilbert and acknowledge that Viewpoints 6 and 7 are not relevant because of the trail relocation and are no longer public places.

2.8 Countryside Trail/Te Araroa Trail Visual Amenity Effects - Temporary Effects

Ms Gilbert comments at [5.15 – 5.20] regarding the "duration of temporary effects" and the corresponding adverse visual amenity effects for the trail viewing audiences. At [5.15] Ms Gilbert suggests '*The RMM Addendum provides no guidance with respect to the duration of the "temporary effects"*.' I disagree and for clarity provide the following commentary (underlined for emphasis) that had been included at [2.2] in the RMM Addendum:

*'It is considered that temporary adverse effects on the landscape values enjoyed (experienced) by viewers using the Countryside Trail/Te Araroa Trail will occur over an assumed period of approximately two - three years for viewpoint 8, and approximately five years for viewpoints 5 – 7, bearing in mind that some advanced grade beech trees are proposed in strategic locations at a height of 2.5 m at time of planting pre-construction. These beech trees will provide 'spot screening' rather than 'blanket screening', punctuating and breaking up the visible built form.'*⁸

A table was included within the RMM Addendum where the adverse visual amenity effects for the trail viewing audiences were rated as reducing to **low - moderate** after five years for Viewpoints 5-7 and reducing to **low** after 2-3 years for Viewpoints 8-9.

At [5.16] Ms Gilbert's comments on recreational trail users as being a '*more sensitive viewing audience*'. While the sensitivity of the receptor was covered in the RMM LAR⁹, I make the following further comments. In my opinion Ms Gilbert's comment is too 'broad brush' and does not account for the variety of trail user, particularly in this location. I draw the Panel's attention to the concept of 'the man or woman on the Clapham omnibus'¹⁰, also known as the man on the Bondi Tram or the woman residing on Manse Road, Arrowtown. These people are perhaps better known as '*the reasonable person, the person on the street*'. While I acknowledge the user of the Countryside Trail/Te Araroa Trail may not be *just 'the person*

⁸ Addendum Landscape Assessment Memo prepared by RMM, dated 18 November 2025.

⁹ Landscape Assessment Report prepared by RMM, dated 15 August 2025, Page 30

¹⁰ Gardner J, The many faces of the reasonable person, Law Quarterly Review, 2015

on the street', my point is that often we seek confirmation bias, and therefore the experience of and expectations of the receptor is often forgotten in the assessment of 'landscape'.

The importance of the '*sensitivity of the receiver*' in assessing landscape effects is well established. The most likely users of the Countryside Trail/Te Araroa Trail will most likely be residents of the area or international and domestic visitors to the Wakatipu Basin and its environs. Following this, the three most likely higher user groups of the Countryside Trail/Te Araroa Trail are what would be called transient users. They are generally using the trail for exercise – an active recreator, as an outing to enjoy the environment and appreciate the view - a semi active recreator, or in the case of those walking/cycling the wider Countryside Trail/Te Araroa Trail - travelling between destinations. This section of the Countryside Trail/Te Araroa Trail links the Wharehuanui, Twin Rivers, Tucker Beach and Shotover Gorge Trails. This latter group most likely includes the first type of user too.

Invariably the users are typically walking, running, or cycling at varying speeds depending on their intent and skill level. For the visitors to the region, these people are typically concerned with the more interesting and scenic landscape features, and from locations where it is possible to snap a photo of this. Local residents using the Countryside Trail/Te Araroa Trail are obviously more likely to notice changes in the landscape than visitors to the region but again are most likely more concerned with the main views from Countryside Trail/Te Araroa Trail across the wider landscape setting.

Sensitivity of the receptor is also allied with expectation and experience in the context of the Countryside Trail/Te Araroa Trail as it winds its way through, around, up and over the landscape of the Wakatipu Basin between Dudley's Cottage in Arrowtown and the Old Lower Shotover Bridge. This has been discussed in the RMM LAR. Therefore, given the broad appeal of the Countryside Trail/Te Araroa Trail and depending on the user and the activity they are engaged in, I anticipate that the sensitivity of these users will vary and one cannot label them all as '*a more sensitive viewing audience*'.

2.9 Landscape Effects

Moderating influence of the spatial arrangement of built development and OSA encroachment

I note Ms Gilbert comments at [5.22] and I refer back to my comments at 2.2 in this Supplementary Memo. A further comment I wish to make, is that where Ms Gilbert states '*that area of OSA having a relatively low visual profile excepting in relation to views from the Countryside Trail/Te Araroa*'¹¹, I assume this comment is made in regard to the current condition, bearing in mind existing views from the Countryside Trail/Te Araroa Trail OS area are limited, rather than the proposed condition as the extended spur will screen any view of that OS area from the Countryside Trail/Te Araroa Trail.

Landform Effects: new landform spur

In response to Ms Gilbert's comments at [5.25 – 5.29] regarding the proposed spur, it is my experience through involvement in several infrastructure projects over the years that a bund is often a 'standalone landform' and typically regular (and somewhat sausage like) in both width and height. In my opinion that is quite different to both a mound and a spur extension, as is the case with the proposed landform. Given the fact the proposed landform varies in both width and height across its length, and extends from a sub spur of, and at the toe of Christines Hill it will mimic an extended natural spur landform and will not be incongruous within the wider landscape setting.

¹¹ Landscape Peer Review [5.22], Page 15

In my opinion Figure One (as shown as Figure 2 below) within Ms Gilbert’s report demonstrates the small scale of the spur extension in the context of the continuous sequence of escarpment slopes of the Wharehuanui Hills landform that define the edge of the Speargrass Flats alluvial valley floor.

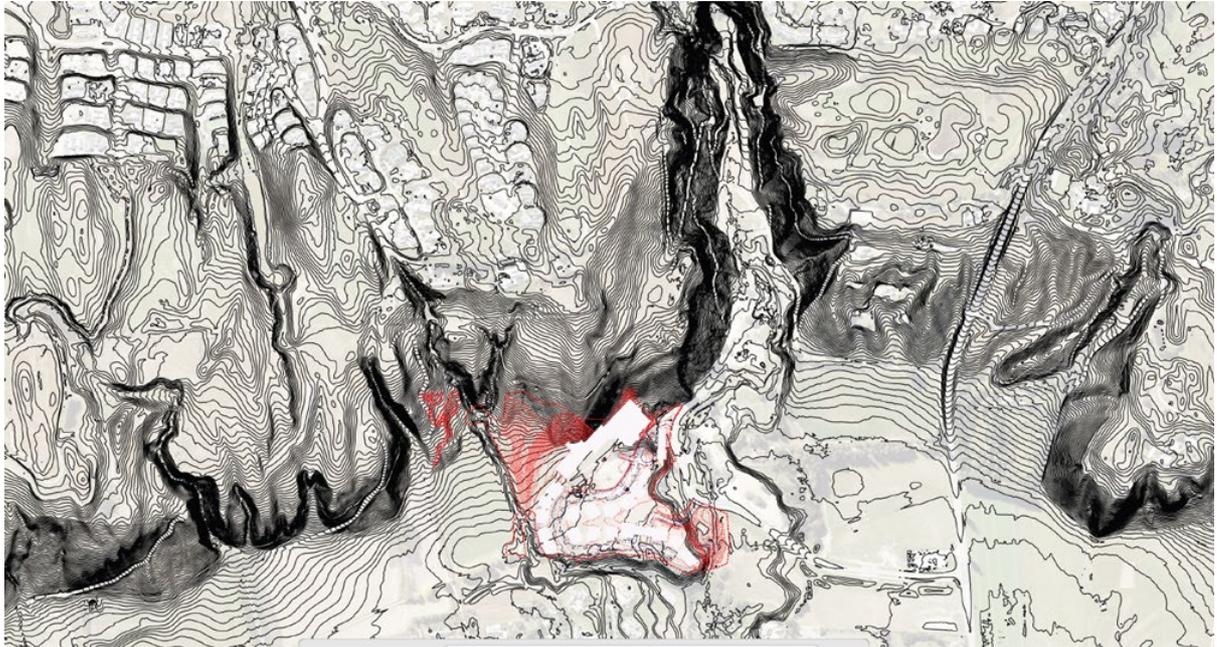


Figure 2: Figure 1 - Appendix 20 Proposed Contour Overlay Plan (red linework) overlaid on Existing Contours (black linework) from the Landscape Peer Review.

At the broader Speargrass Flats scale, due to the small and contained scale of the spur extension, the legibility and expressiveness values associated with the Wharehuanui Hills landform are maintained.

I note Ms Gilbert states...*‘I also generally agree with the RMM Report (and associated documents) that the proposed development has been located and designed to optimise its visual containment and that, in time, the proposed built development will be successfully visually absorbed into the wider context’*¹².

Visual Effects as a Proxy for Landscape Effects

I confirm that the methodology and terminology used in the landscape assessment report and subsequent addendum was informed by the Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. Furthermore, these were tailored to suit the nature of the project. Regarding an assessment of landscape and visual effects my understanding is informed by the following:

*“A visual effect is a kind of landscape effect. It is a consequence for landscape values as experienced in views. Visual effects are a subset of landscape effects. A visual assessment is one method to help understand landscape effects.”*¹³

It is important to remember that whether the proposal is considered appropriate is determined by the visual effects on the receiving environment and whether the landscape values attributed to this setting are retained or whether, if adversely affected, effects can be satisfactorily avoided, remedied or mitigated. In

¹² Landscape Peer Review [5.5], Page 13

¹³ ‘Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines’. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022. Page 135.

general, landscape values (biophysical, perceptual and associative) experienced visually include a high scenic outlook (views of the rural landscape), the legibility and visual coherence of the Whakatipu Basin landscape and the views to the surrounding mountains, the evolving character of Ayrburn, the history associated with Ayrburn as well as a level of expectation of development within the landscape setting.

It is important to remember that perceptual values which also include *openness, spaciousness* and *rural character* are mostly visually experienced rather than depending on a certain level of knowledge like associative values often are. The RMM assessment has been framed as such, and I do not believe that this is *'out of step with landscape assessment best practice'*¹⁴.

Cumulative Adverse Effects

In response to Ms Gilbert's comments at [5.34 – 5.40] regarding cumulative adverse effects, in my opinion Ms Gilbert is conflating cumulative effects with precedent effects. It is my understanding that *... 'Cumulative effects are the effects of a proposal in combination with those previous developments' and... 'Mostly, the effects of a proposal are simply the effects on the existing environment'*¹⁵.

Therefore, a consideration of cumulative effects is a consideration of what is being proposed added to what is there. In that regard and as per [5.3.2] of the RMM LAR it is considered the proposal will add a series of buildings into a contained area of a rural landscape. The additional built form will have a **low-moderate** cumulative adverse effect on the landscape character and visual amenity values set out in Schedule 24.8 LCU 8. Due to the existing and proposed containment of the development cluster along with its co-location within Ayrburn, the new built form will become integrated within this immediate landscape setting. In other words, on balance the landscape values of LCU8, as a whole, are maintained.

Defensible Edge

At [5.39 b), 5.40 and 5.41f)] Ms Gilbert comments on legible defensible edges to define zones, while curbing encroachment and development sprawl.

To my mind, I'd suggest most people would 'read' the pattern of development evolving at Ayrburn, including that consented for the WPZ, as one. The built form and landscape language across Ayrburn 'crosses' zone boundaries as drawn on a two-dimensional plan. In other words, and because landscape is experienced as you move through it, it will be difficult to decipher the edge between the WPZ and the ASP as you experience Ayrburn. There is no legible defensible edge in this location, and from a landscape and visual amenity perspective there is no need for one.

In my opinion the proposal reinforces the role the OS plays in the ASP, and the OS will continue to provide an appropriate interface and edge to future development in the ASP where it is adjacent to the WBRAZ rural land and public parts of the Countryside Trail to the west, and MRZ to the north and obviously to ALHR and the rural land to the east.

Therefore, from a landscape planning perspective it makes sense that the OS along the western side of the ASP meaningfully contains the built form of Ayrburn. Further to this, in my opinion the proposed spur extension reinforces and further contains the proposed built form, therefore establishing a greater

¹⁴ Landscape Peer Review [5.30], Page 18

¹⁵ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022. Page 153.

defensible edge minimising the risk of development sprawl, resulting in Ayrburn reading as a well-considered and complementary node of development.

2.10 Proposed Conditions of Consent

At [7.1] Ms Gilbert recommends two new conditions of consent [7.1 a and b] and also suggests changes to proposed conditions of consent 55 – 59 inclusive. I have reviewed these recommendations and agree with them.

The Evidence of Rebecca Hadley

2.11 Overall Comment

I have reviewed the evidence of Ms Hadley, and as outlined in the introduction to my memo, most of the matters raised by Ms Hadley have been addressed in my response to Ms Gilbert's report. There are several recurring themes, so rather than repeat myself I will only provide comment on any matters considered to be additional to those already commented on.

2.12 Attributes and Values of the Site

Ms Hadley suggests¹⁶ that not all of the attributes and values of the site and surrounding landscape have been correctly identified in the RMM LAR. I cannot see any additional values as identified by Ms Hadley that have not been caught in either the RMM LAR or the RMM Addendum.

Further, Ms Hadley questions the authenticity of the proposed masterplan design with one of the reasons given being... *'it will isolate an area of land that it plans to further degrade by planting an unconnected paddock of grapes that is not associated with any other signs of farming.'*¹⁷ Under the ASP the area Ms Hadley is referring to is an OS area and within the PDP under the Zone – Location Specific Rules at 27.7.32.2 a, the following control is imposed as a condition on future subdivision:

'No vegetation other than pasture grass, crops or grapevines shall be planted within any Activity Area OS provided that this control does not apply to planting to maintain or replace trees and landscaping along Ayr Avenue.'

Therefore, I cannot see how Ms Hadley can question the authenticity of growing grapes within this area of the Site as the ASP specifically provides for this. Furthermore, there are grapes vines within the eastern paddocks (also OS areas) of Ayrburn, so it is simply untrue to suggest the proposed paddock of grapes are not associated with any other signs of farming. Grapevines within this paddock is provided for within the PDP to maintain rural character and rural views.

2.13 Open Space and the Speargrass Flat Valley

I acknowledge the role Speargrass Flat valley plays within the local landscape setting, and as identified in the PDP LCU8. However, when one considers the ASP and supporting provisions, along with Ayrburn in totality and sitting adjacent to the WPZ, then I am of the opinion Ms Hadley conflates and inflates the notion of rural character and open pasture within the immediate setting. I believe her comments are inaccurate and do not take into consideration the full extent of development enabled by the ASP.

¹⁶ Comment on the Ayrburn Screen Hub by Rebecca Hadley, Page 5.

¹⁷ Ibid, Page 4.

I am also of the opinion Speargrass Flats valley either side of the Site will continue to serve the role identified¹⁸, and the environmental characteristics and visual amenity values as identified in LCU 8 to be maintained and enhanced¹⁹ will be. These are:

Central and western portion of LCU 8

Sense of openness and spaciousness as a 'foil' for the more intensively developed rural residential areas nearby.

Maintenance of unobstructed rural views from Speargrass Flat Road to the largely undeveloped hillslopes and escarpment faces to the north and south.

Eastern portion of LCU 8

Integration of buildings with landform and/or planting.

Maintenance of a spacious and open outlook in views from the Queenstown Trail and Arrowtown Lakes Hayes Road, including the southbound view as one descends Christine's Hill.

Maintenance of openness in views from Hogans Gully Road to the backdropping hill /escarpment landforms and broader ONL mountain context.

2.14 Accuracy of Attachments

Regarding Attachment One – Photo from Tobins Track, I consider this misrepresents the view attained from this viewing location. See Figure Three (attached as Appendix A), a photo looking in the same direction taken from the top of Tobins Track, May 2023. In my opinion this provides a better representation of the scale of the view and the distance between the viewer and the Site than Ms Hadley's photo representation. Furthermore, I question the validity of overlaying with colour (green) the Speargrass Flat valley floor in the photo to 'highlight' it. Surely, if one is needing to 'highlight' a landscape element in a photo rather than relying on the true representation of that element in the photo, to reinforce a point being made, then is this not potentially overstating its importance within the context of the overall scene.

Regarding Attachment Two, the arrow used by Ms Hadley to reinforce her point in regard to the sweep of continuous rural character and open pasture seems to ignore the fact that a good part of the arrow as it crosses the ASP area encompasses the two R areas of the ASP. Development enabled by the ASP provisions would in itself interrupt this continuous rural character and open space as espoused by Ms Hadley.

Effects on Immediate Neighbours

2.15 Overall Comment

In some of the comments received there has been criticism on the lack of commentary within the LAR regarding the assessment of the landscape and visual effects on existing neighbours. The following response is made in respect of concerns raised about views from neighbouring properties.

¹⁸ PDP – Chapter 24, LCU8 – Page 23-24, Sense of Place - *Whilst Hawthorn Triangle and Lake Hayes Rural Residential LCUs form part of the valley landscape, their quite different character as a consequence of relatively intensive rural residential development sets them apart from the Speargrass Flat LCU, with the latter effectively reading as 'breathing space' between the two. To the eastern end of the unit, there is the perception of the Lakes Hayes Rural Residential area sprawling west into Speargrass Flat.*

¹⁹ Ibid – Page 24-24.

2.16 Visual Impact and Loss of Rural Outlook

In reviewing the evidence of Jan Andersson, I understand the panoramic view described at [16]. However, it would have been helpful if the evidence included photographs that graphically verified the written description provided. So as to understand the full impact, visual modelling has been undertaken for the proposal in order to verify the claims²⁰ being made in regard to the visual impact and loss of rural outlook from the Andersson property at [REDACTED]. Given the timeframe between evidence and comments received and the writing of this supplementary memo, a further site visit has not been undertaken. However, having visited the Site many times, I am familiar with the boundary interface conditions and generally familiar with the outlook from [REDACTED].

Five views were modelled and overlain in a Google Earth model, see Figures 4 - 9 following that show snips from the modelling. The Google Earth model used includes the proposed spur extension which can be seen in Viewpoints 1 and 4. It does not include any of the planting associated with the proposal.

The double yellow line in the modelling depicts the boundary of the Site, while the yellow coloured 'dashes' identify the accommodation units (which have been modelled) that will initially be visible from the submitter's property. Notably, due to existing landform, the studio buildings will not be visible at all from these Viewpoints (which are representative of views from [REDACTED]). Regarding the accommodation units, as the mitigation planting grows on the proposed spur extension, these will be screened in time.

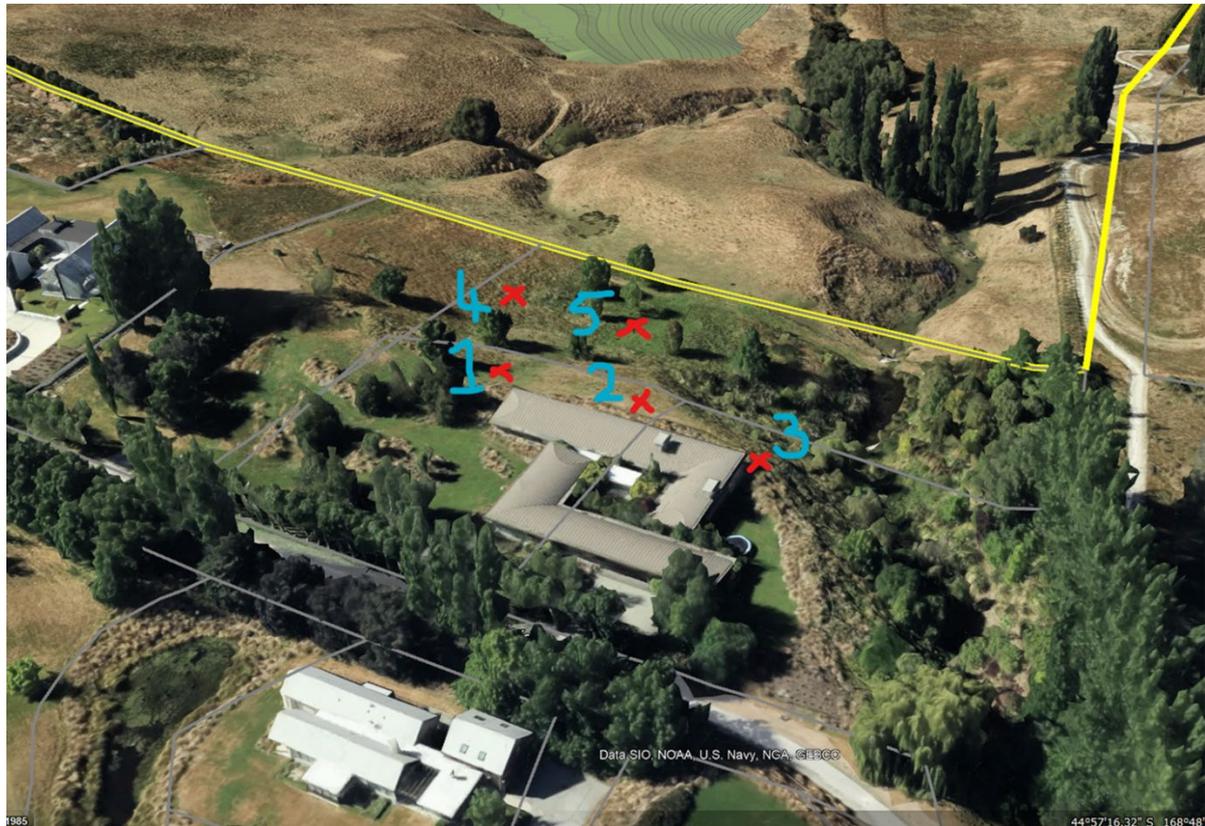


Figure 4 – [REDACTED] Viewpoint Locations used for Visual Modelling

²⁰ Statement of Evidence of Jan Andersson dated 17 December 2025 – [18-19], Page 5



Figure 5 – Viewpoint One



Figure 6 – Viewpoint Two

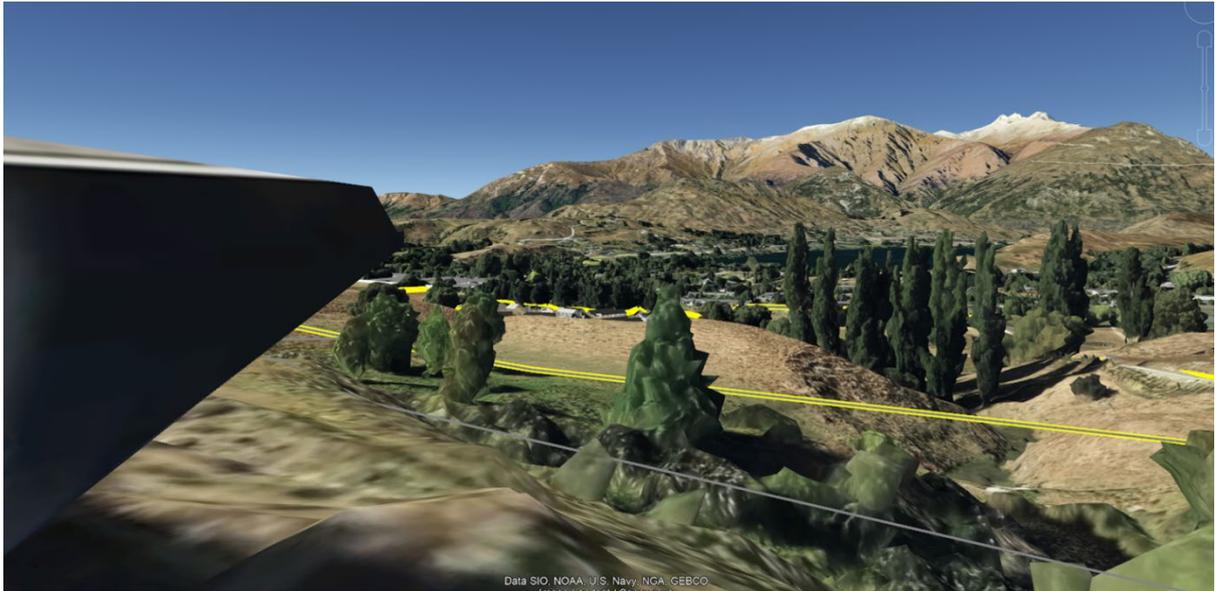


Figure 7 – Viewpoint Three



Figure 8 – Viewpoint Four

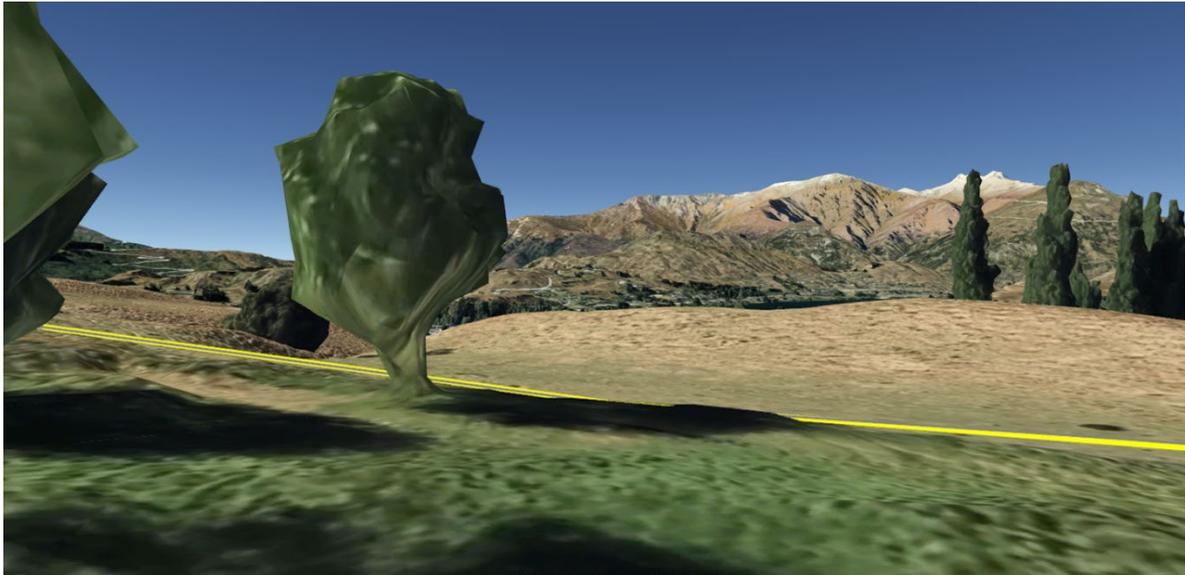


Figure 9 – Viewpoint Five

In my opinion Mr Andersson overstates the visual impact and loss of rural outlook when he claims ...*'In particular, two massive sound stage buildings (studios) are planned in the paddock directly west of my house'...* and...*'From my property, these structures will be clearly visible. Today I see pastoral green fields. In the future I'd be looking at industrial sized buildings'*²¹. Then at [19] Mr Andersson claims...*'I anticipate that the pleasant rural vista I currently enjoy will be fundamentally altered and will feel more like looking over a town or large facility'*²².

This is for two reasons. First, the visual modelling shows that while some of the accommodation units will be initially seen, the studio buildings will not be seen from the Andersson property. Therefore, acknowledging the accommodation buildings will appear more urban than rural, *'industrial sized buildings'* will not be part of the view from the Anderssen property. Second, the current outlook from the Andersson property includes the RRA of the ASP, the area within which the accommodation units are proposed. While there is a consenting process to be followed, this area of the Site is identified for rural residential living, which will in itself provide a different outlook than currently experienced from the Andersson property.

Furthermore, the Site represents a very small part of the overall scene as appreciated from the submitter's property, the uninterrupted views across the Wakatipu Basin that take in Lake Hayes, Bendemeer, Morven Hill and The Remarkables remain. From the Andersson property the scale of proposal would be subservient to the wider landscape setting, and the existing spacious and open outlook in the available views will be maintained. Subsequently, *'scenic rural views'*²³ will also be maintained.

Therefore, in my opinion the claims made in the evidence of Jan Andersson in regard to visual impact and loss of rural impact have been overstated.

²¹ Comments of Jan Andersson dated 17 December 2025 – [18], Page 5 and 6

²² Ibid, [19], Page 6

²³ Ibid.

Regarding the Collins comments, I have reviewed the photographs²⁴ and written comments provided. It would have been useful to understand where exactly the photographs have been taken from, to verify the claim that... 'The proposed development would be clearly visible from our backyard, rear deck, main living areas, and multiple bedrooms.'²⁵

While I have not visited the Collins property at [REDACTED] I have previously walked and photographed the public bike and walking track along this southern edge of Ayrburn and adjacent to the Collins property. In this regard I make the following comments. The conifer shelterbelt identified as 'A' in Figure 10 below, is protected against removal, unless agreed by the southern neighbours under RM171280.

There is also a Tree Protection Area (TPA) in the same place over them in the ASP. In places the conifers are approximately 25m in height, and where there are gaps (as shown in the Collins' photographs) additional conifers have been planted over the last 12 months. While these conifers form a visual barrier and will increasingly do so when the recently planted ones grow, the overall amenity provided by them is relatively poor. The reason for this is threefold. In places they appear unkept, they cast considerable shade and they prevent longer views to the mountainous backdrop.

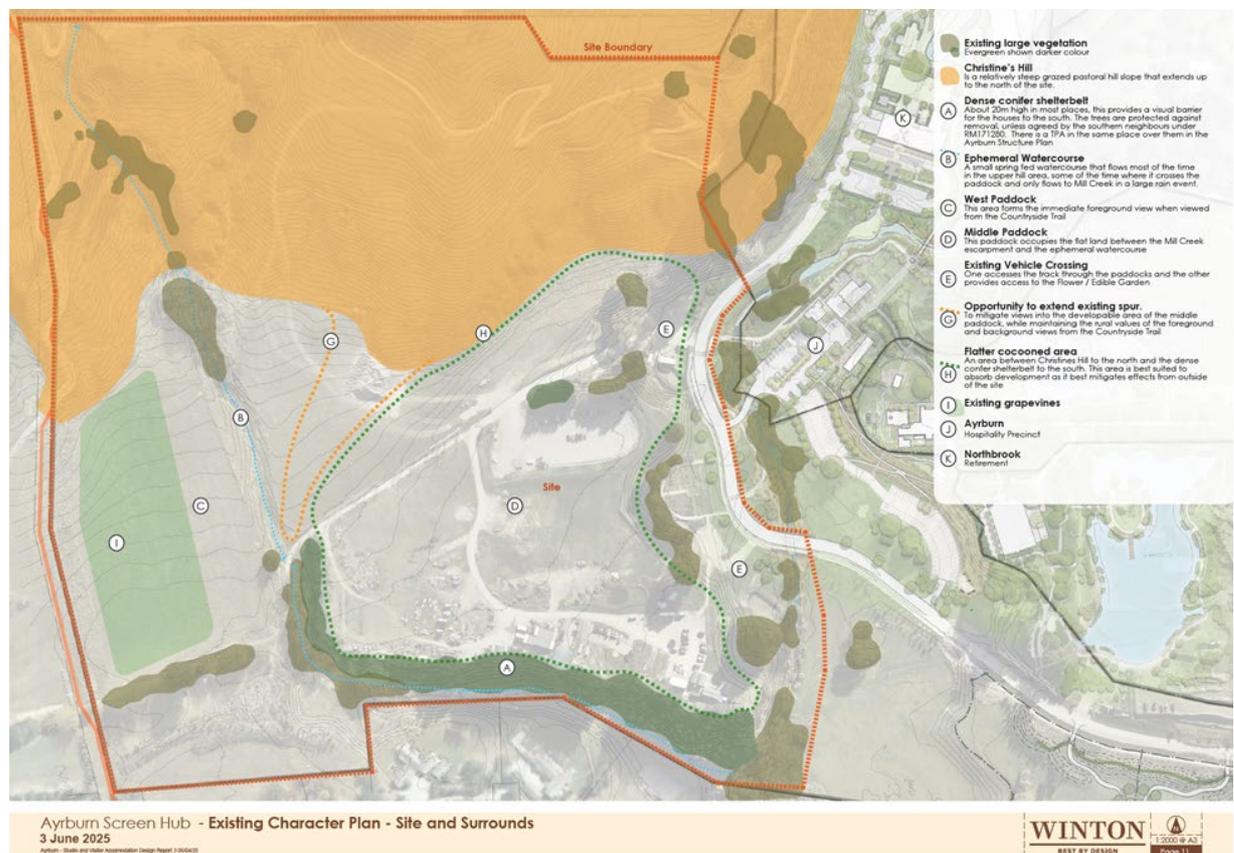


Figure 10 – Existing Character Plan – Site and Surrounds

Furthermore, and as shown in Figure 11 below, 20 mountain beech trees have been planted within the last 12 months, within Ayrburn and adjacent to the Collins' boundary. I understand these trees have been

²⁴ Comments of Greg and Lianne Collins, [REDACTED], Appendix B.

²⁵ Ibid, [2.2]. Page 3

planted at a height of 1.7m and based on the advice I have been given²⁶ these trees are expected to achieve 800mm of annual growth. Therefore, in say five years' time these trees will potentially be between 5-6m in height and will therefore provide full screening along this boundary.



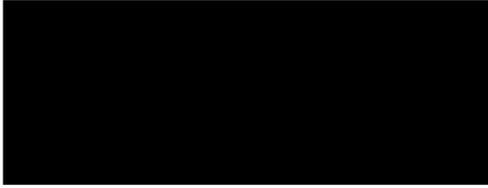
Figure 11 – Tree Planting Plan – [REDACTED]

It is now my understanding that the proposal, subject to each relevant neighbour's sign off, is to progressively remove the conifers and replace them with a comprehensive planting of native species. This is primarily in response to matters raised in some of the comments in regard to the existing conifers and the lack of quality of the southern boundary interface of the Site. Associated with this proposed planting would be an acoustic barrier (hedged on both sides so not to be visible).

It is also my understanding this would only happen if the relevant neighbour signs off / requests it for their relative adjoining part of the TPA, and that the relevant adjoining neighbour will have access into the adjoining part of the TPA to top trees in order to maintain views.

As far as views to the north from these neighbouring properties are concerned, the current views are mostly screened by the mature conifers, and the neighbours have no control over that situation. The combination of conifer removal/native planting/access to top trees will give these neighbours full control over the extent of screening and the extent of views to the north.

²⁶ Refer RMM Landscape Addendum Report, Page 9, dated 18 November 2025



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Tony Milne

NZILA (Fellow) Landscape Architect

Rough Milne Mitchell Landscape Architects

Appendix A



Figure 3 – View from Tobins Track approximately 3.2km from the Site

Photograph Information.

Date of Photography:	03 May 2023
Camera:	Olympus OM-D E-M10 Mark II
Print Size:	A3