

**BEFORE THE EXPERT PANEL APPOINTED UNDER THE FAST-TRACK
APPROVALS ACT 2004**

Under	The Resource Management Act 1991 (the Act)
In the Matter	of the substantive application for approvals for the Mt Iron Junction Housing Scheme at 237 Wānaka-Luggate Highway, Wānaka.
Between	MT IRON JUNCTION LIMITED Applicant
And	CM MORGAN AND JC MORGAN FAMILY TRUST Invited Party

LANDSCAPE COMMENT OF ELIZABETH ANNE STEVEN

DATED 19 JUNE 2026



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MEMORANDUM

INTRODUCTION

Qualifications and Experience

1. My name is Elizabeth Anne Steven.
2. I have been asked by Trustees of the CM and JC Morgan Family Trust which owns [REDACTED] to review landscape matters related to the proposed residential development of Mt Iron Junction Ltd Housing Scheme located at the junction of SH6, SH84 and Riverbank Road on the outskirts of Wanaka.

Qualifications and Experience

3. I am a Registered Landscape Architect with the NZ Institute of Landscape Architects. My qualifications are a post-graduate Dip. L.A (1988) and a B.Sc. (Geography) (1986). I have 37 years of professional experience. I have had a sole consultancy practice in Wanaka since 2001 (ASLA Ltd), the year I and my family moved to live in Wanaka.
4. The majority of my work is in the area of landscape description and characterisation, evaluation and classification, natural character assessment, and in the assessment of landscape effects of proposals mainly in the rural landscape. My work has spanned consultancy for applicants, advice and expert opinion for submitters, and expert advice mainly in peer review format as well as primary assessment for district councils. I have appeared as an expert landscape witness at many council and Environment Court hearings and in recent years participated in Fast Track processes.
5. My most recent relevant experience is peer reviewing the landscape assessment of the 1 Hansen Road Worker Accommodation in Frankton for the EPA (2024); assessing the Sticky Forest (Bunker and Rouse) urban development proposal on behalf of Kirimoko No 2 Ltd Partnership (2022); assessing the Shannon Farm residential development project at Rippon near Cromwell for the Central Otago

District Council (2021); assessing the Kaka valley/Bayview Ridge (Maitai Valley) Nelson proposed urban development project (PPC 28) on behalf of a Maitai Valley residents group (2022); and assessing a proposed subdivision within a building restriction area in Bannockburn for Bannockburn Responsible Development Inc. (2024). I served on the Wanaka Urban Design Panel for a number of years.

6. As a resident of Wanaka since 2001 I am familiar with the Site.

Code of Conduct AND Declaration of Interest

7. Although this is not an Environment Court hearing, I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

8. My evidence addresses the following matters:
- (a) Context landscape and site character and values
 - (b) Key landscape issues
 - (c) Assessment of landscape effects
 - (d) On landscape character, addressing integrated urban landscape
 - (e) On the values and integrity of the Mt Iron ONF
 - (f) On the private amenity of the property at [REDACTED]
[REDACTED]
 - (g) Conclusions and Recommendations

9. In preparing my evidence I have read and/or referred a number of documents. Material I have reviewed in the course of preparing this memorandum:
 - (a) Appendix D1 - Landscape-Visual-Assessment
 - (b) Appendix D2, 3 and 4 – Landscape Graphic Attachment Part 1, 2 and 3
 - (c) RFI Response 1 – Landscape Attachment A
 - (d) RFI Response 1 – Graphic Attachment B
 - (e) RFI Response 1 – Attachment C
 - (f) Appendix C2 – Architectural Renders
 - (g) Appendix C1 – Architectural Plans Part 2
 - (h) Appendix B1- Urban Design and Landscape Masterplan
 - (i) Landscape Joint Witness Statement – Mt Iron Junction Ltd 4 November 2019
 - (j) Environment Court Decision NZ ENVC 53 2021 Mt Iron Junction vs QLDC
 - (k) Queenstown Lakes Spatial Plan 2021
10. I refer mainly to the RMM Landscape Assessment Report dated 17 December 2025 (the “LAR”) and associated Graphic Attachments 1, 2 and 3 in Appendix D2-D4 (“GA1”, “GA2” and “GA3” respectively). References in brackets within my text refer to sections and page numbers in the LAR.

11. In preparing my assessment I have been guided by Te Tangi a te Manu (“TTaTM”), the NZILA landscape assessment guidelines. I use the same 7 point rating scale as RMM shown on p6 of the LAR.
12. In preparing my evidence I rely on the description of the proposal in the LAR and in the various plans in the Graphic Supplement and in the Architectural plans and renders (C1 and C2) and the Urban Design Graphic Attachment B1.

Contextual Landscape, Site Characteristics and Values

13. I concur that the Site is zoned Rural under the Queenstown Lakes Proposed District Plan (“the PDP”) and that it is not ONL or ONF¹ it is RCL – Rural Character Landscape, the only other rural zone category, even though it is not covered by any schedule describing and evaluating it. I concur that the Site is immediately adjacent to the Mt Iron ONF and to the Mt Iron Reserve, and that it sits outside the Urban Growth Boundary (UGB). It is also not within any future urban growth areas identified in the Queenstown Lakes Spatial Plan 2021. Maps of the future urban growth areas are contained in my Appendix.
14. The Site’s rural zoning is contiguous with the rural zoning of Mt Iron Reserve. It is not an isolated pocket.
15. It is my understanding that a change to the zoning is not being sought in this application nor is it proposed to move the UGB. On this basis, there can be no presumption of any alternative zoning such as the “standardised Residential zoning” referred to in the LAR at 5.4.4 (p43).
16. I concur that the Site in itself is too small to be a “landscape” (4.1) and that the relevant landscape for assessment purposes is the landscape context identified at p3 of the GS1 and in the Local Context Plan at p 5. However the most relevant urban landscape is that of the upper terrace either side of Aubrey Road and to the east of SH6 opposite the Site, as well as the adjacent land areas alongside SH84 and around the north end of Riverbank Road and the southeast part of Mt Iron Reserve.

¹ Outstanding Natural Landscape and Outstanding Natural Feature

These form the immediate and most relevant landscape context for the Site

17. It is not correct to say that the Orau/Cardrona River is the urban edge of Wanaka (4.2.2, at the end). The UGB is on the west side of SH6 and Riverbank Road, with a broad buffer of RL and RR zoning in between these roads and the Cardrona River (refer the planning map in GA1 at p6). The relevance of the Cardrona River (and the Clutha River Mata Au) is that no urban development is to exist beyond these rivers, to the north and east.
18. It is relevant to note that as well as sharing the same zoning, the landform of the Site is the same outwash plain (a fluvio-glacial depositional landform) as the eastern margin of the Mt Iron Reserve, i.e., it is continuous through the Site. It is not a river terrace of the Orau Cardrona River. This landform also continues underneath the existing LLR zoned residential development to the north.
19. I agree that the overall character of the Site and its context is peri-urban.
20. The contextual analysis has however omitted some important characteristics relevant to the assessment:
21. There is a substantial buffer of open space along both sides of SH84 between the Three Parks Roundabout and the Junction Roundabout and along SH6 and around the north end of Riverbank Road, occupied by grass and tree vegetation and/or recent native planting. It includes natural moraine landforms and constructed mounding for privacy, visual mitigation and noise control. Some of this is zoned rural, other parts RL or RR, or LLR. It also includes the Protected Landscape Area ("PLA") of the consented Mt Iron Junction Landscape Master Plan 2021 (see p8 of GS1). I also note that the Blue-Green Network Plan (see Map 17 at p53 of the Spatial Plan) has a proposed "enhanced/new green corridor" along the north side of SH84 including along or through the south boundary of the Site.

22. There is no description in the LAR of the ambient pattern and density of urban and RL/RR built development in the context landscape, or of architectural styles, materials and colours. The spatial distribution of built form is illustrated in the Figure Ground Map at p005 of the Urban Design Graphic Supplement. It shows a spacious and irregular pattern of built form to the north and east of the Site on the upper terrace with a variety of shapes and sizes of building footprint. Forms south of SH84 within the RL zoning are more widely spaced. The open space along SH84 is clear to see (if the red coloured forms in the Map are ignored). There are no straight lines or repeated housing forms or terrace housing. All built form is comprised of stand-alone dwellings (or commercial/community buildings such as the vet clinic and the church). On the lower terrace in Albert Town housing is denser and less spacious, there are grid patterns, and there is a small element of terrace housing by the small commercial centre at the Albert Town Bridge, at the northern extremity of the context landscape. Street patterns in the neighbourhoods around the Site on the upper terrace tend to be sinuous rather than straight. There is a variety of building styles, materials and colours. No two buildings are the same.
23. The LAR states that the consented development has a density rate of one dwelling per 1240m² (top of p42). Whilst I agree this is in theory an urban scale (low density) it is somewhat meaningless when describing the character of the Site with the consented development because the density is not consistent across the Site. Instead it would be concentrated in one part of the Site including in multi-storey buildings, with large parts of the Site left in open space to preserve the openness and a rural character at the base of Mt Iron. For this reason, the consented development would not express an urban character across the whole Site, especially when the Site's openness is recognised as contiguous with the open space of Mt Iron Reserve. The consented development is more consistent in my opinion with the peri-urban character ascribed to the context landscape.
24. The LAR is incorrect at part 5.3.3 where it states the Site does not display any landscape values consistent with an RCL. Whilst overall it lacks some typical qualities of rural landscape and there is consented

residential and commercial development for the Site, it has – and would retain - one key rural landscape attribute, being openness/open space. As described above, it is part of the corridor of open space along SH84 including Mt Iron Reserve with which the Site is contiguous, and along SH6 (to a lesser degree). The retention of open space by way of generous highway setbacks and the linear ex-road reserve along the north boundary (which effectively provided a buffer to the existing residential neighbourhood to the north), is a key feature of the consented development, including the whole of western part of the Site being protected as open space (the PLA). This open space is important in allowing full and close views of the high, rugged rock-bluff side of Mt Iron from the roads and their footpaths, the most dramatic and closest views available. This experience in my view is very important to the sense of arrival in the place of Wanaka.

25. Following from the above, the Site is very important as the foreground and visual plinth to Mt Iron and also Little Mt Iron.
26. I do not agree that the Site has Moderate to High capacity to absorb built development as opined in the LAR (4.4 and 5.3.3), particularly of the kind proposed in this application. Because of the values described above, in my opinion the Site has Moderate capability for built development of an urban character. The location relative to views of Mt Iron ONF and to the neighbouring properties to the north, the height/bulk, and the visual appearance and aesthetic quality of built form in this particular “gateway” location are the key aspects that need to be considered when developing this Site.

Key Landscape Issues

27. The key landscape issues are drawn from the relevant statutory provisions, and from the Queenstown Lakes Spatial Plan. I have set out what I consider to be the relevant extracts from the proposed QLD plan and some pertinent parts of the Spatial Plan in my Appendix. I have also included three maps from the Spatial Plan, all of which show the Site as persisting as rural land, outside of urban growth areas. I

have highlighted the QLD Plan provisions identified as relevant and addressed in the LAR.

28. I agree that s6(b) and s7(c) and 7(f) of the Resource Management Act are relevant as overarching objectives.
29. I consider the key landscape issues relevant to this proposal and its landscape context to be:
 - (a) maintain or enhance rural landscape character and values including open landscape character and important views, and avoiding adverse effects on visual amenity from subdivision and development that is highly visible from public places. This achieved by avoiding sporadic and sprawling urban development across the rural areas of the Upper Clutha Basin, ensuring urban growth outside the Urban Growth Boundary and in rural zones is avoided and that it is contained within the future urban areas identified in the QL Spatial Plan;
 - (b) achieving compact and consolidated urban form with a distinct and defensible urban edge; and whether there would be an urban pattern that responds sensitively to existing urban patterns and local landscape character
 - (c) protect the landscape values of the ONF by ensuring the character and values of the Mt Iron ONF are not compromised and avoiding adverse effects on visual amenity from subdivision and development that forms the foreground of ONFs when viewed from public roads
 - (d) mitigate potential adverse effects on landscape character, visual amenity, and outlook from directly adjoining private properties and to avoid adverse effects on established and anticipated activities including through setbacks and controls on location and direction of night lighting and noise.

30. These issues provide headings for the assessment of landscape effects. The LAR touches on these as matters for assessment at 5.2.

ASSESSMENT

Effects on Rural Landscape Character

31. Rural landscape character would not be maintained or enhanced, particularly the attributes of openness and spaciousness. Important views would be affected, particularly views of Mt Iron ONF as discussed below. Adverse effects on visual amenity would not be avoided where highly visible from public places. This proposed development is within a rural zone and outside the Urban Growth Boundary and is not within future Urban Expansion areas identified in the QL Spatial Plan 2021. The development of urban land use outside these areas is not avoided.
32. The Site is highly visible from major roads (state highways) and their adjacent footpaths and cycle paths. It is located in a very high profile location at one of the sequential gateways to Wanaka. Arguably this is the prime gateway, being at the junction of the highways and with the southeast face of Mt Iron, the most dramatic, rugged and closest experience of the distinctive, highly legible and classic roche moutonee land form. This location is very important in my view for defining the place of Wanaka.
33. The LAR concludes effects on rural landscape character are not a relevant assessment matter and that there is no requirement to assess effects on visual amenity (referring to policy 6.3.4.8) because the Site is not rural in character, does not display any rural characteristics and its underlying zoning is an anomaly (5.3.3, and p48). The LAR states *“there is no rural character to maintain, and no visual amenity values stemming from rural attributes/values to maintain or enhance.”*(6.2). As a feasible alternative “baseline” the LAR appears to assume a different zoning (“standard Residential”) under which the PLA in the consented development would cease to exist.

34. Whilst I agree that the character of the context landscape is peri-urban, as explained in my paragraph 20 the Site - being contiguous with Mt Iron Reserve and associated with other buffer areas of open space along the highways - retains landscape values of open space and a sense of spaciousness, even with the consented development. The PLA over the western part of the Site was also to have a park-like vegetation cover, as were the open spaces planned along the SH6 boundary. These open spaces are part of the buffers of open space along SH84 (particularly) and SH6. These have (or will have) their own aesthetic qualities and also retain views of Mt Iron and the distant mountains around the Upper Clutha Basin. I do not think that the metric of an average density of one dwelling per 1240m² in the consented development is relevant (5.3.3 p42) as explained in my paragraph 20(b). I also disagree with the LAR analysis point (describing VP3 p20) that on arriving at the Junction Roundabout people would expect to see development (of the kind proposed). In my experience urban areas often have spacious open space corridors with trees as their welcoming approach (including Wanaka today, and for example, Fairlie, and Ashburton from the north). The view north along Riverbank Road and SH6 incidentally is of Mt Maude, not Mt Burke (see description of VP16 p25).
35. I agree with the LAR at 5.3.3 that there would inevitably be a substantial increase in built form and density, over the entire Site. The attributes of openness and spaciousness and the park-like foregrounds to views of Mt Iron that existed in the consented development would be lost, replaced by dense multi-storey terrace residential built form and commercial/community facility buildings. The visual effect as foreground to Mt Iron is specifically discussed below. The proposed development is a significant departure from what is consented.
36. The LAR concludes that the effect on visual amenity conferred by the existing landscape character and values (including the consented development) would be variously Very Low, Low and at most Moderate, reducing over time as proposed planting matures to partially screen and filter views of buildings. The architectural merit of the built form is also a reason given for low degrees of adverse effect. In the

LAR the consideration of effects on rural landscape values is limited to the contributions of Mt Iron and the Orau/Cardrona River corridor and does not include consideration of the values within the highway corridors themselves (refer para. 5.2), as well as how the urban pattern would fit with the existing pattern which I cover in the next section. Additionally, the alternative outcome is assumed to be a “cookie cutter” standard residential style of development. The alternative could feasibly include the existing consented development, or retaining rural zoning, or having a mixed-use zoning similar perhaps to the consented development – a mix of commercial, community facility, low density or large lot residential, open space and maybe a node of high density. I reiterate that the Site is not within the UGB nor the future urban expansion areas. The location of the UGB is not as anomalous as it might first appear, as I will explain below.

Urban Form, Urban Growth Boundary and Urban Character

37. If the UGB was shifted to simply run along the west side of SH6 and Riverbank Road, that would be a defensible and readily definable boundary per se. The Orau/Cardrona River corridor provides a solid topographically defined boundary to urban growth at a high level. However at the contextual landscape level with a finer scale of analysis the UGB is pulled in along SH84 to create a broad open space corridor as the entry into Wanaka from Junction Roundabout. This is also a definable and defensible boundary for the most part following the crest of moraine hills to the west and having Mt Iron Reserve on the north side. The Site’s north boundary is no more than a cadastral line once defining a public road situated on a flat outwash plain. However there is no more defensible or definable edge closer to either SH6 or SH84, except the highway edges themselves. Moving the UGB to those edges interferes with the pattern of open space already established. In my opinion the UGB is best left where it is. I do not agree that it would be appropriate for the entire Site to be located within the UGB. Even if it were, that does not automatically mean the entire Site can or should be developed into high density residential development. LLR or RR is more consistent with the ambient character.

38. I disagree that the UGB does not reflect the actual character, amenity and existing and consented development (6.2 p45. In my opinion it does, for the reasons I have outlined.
39. I disagree with the LAR (5.3.4) that the proposal would be in keeping with the peri-urban character and context (including the consented baseline) and that it would be consistent with the pattern of urban development in Wanaka. The urban pattern that would be created by this proposed development once all stages are complete is not in my opinion sensitive to or consistent with the ambient urban pattern. This is well illustrated by the Figure Ground Map Sheet 005. There does not appear to have been any analysis in the LAR of the existing ambient urban pattern as the basis of assessment for responsiveness and consistency of the proposed scheme. I have described the ambient urban pattern in my paragraph 20 a). The proposed form and pattern has none of the characteristics of the existing urban pattern apart from some high level characteristics – modest scale of individual forms, single and two storey, some of the materials and colours. Some of the typologies I consider to be inconsistent with the character one would expect to see in this location – the “slick” three storey Apartment blocks (see Visualisation 5, 5.1); the Type E three storey blocks; the Type C two storey units; and the units shown in Visualisation 8.1. There are no repetitive or terrace forms in the context landscape and no geometric layouts with obvious straight lines and right-angle arrangements on the upper terrace. There is much less open space around individual buildings and along boundaries. It would not express the characteristic, more low-key relaxed character of LLR, RR or RL. I do not consider pale-coloured Roman brick to be an appropriate material to use at the scale proposed. These forms and materials would be more “at home” in a core built-up urban area surrounded by other Medium to High density and commercial urban development, such as in Three Parks (as acknowledged by the LAR in 5.3.3 p42, last paragraph). This approach has recently been adopted within Wanaka through the Urban Intensification Variation which has increased density within existing Wanaka zones in close proximity to the key commercial centres. A high

density development of that nature in this disconnected peripheral location would be a jarring addition to the area in my opinion.

40. The underscoring of the long, straight northwest boundary by placing terrace housing along most of its length promotes an undesirable anomalous and visually incoherent outcome.
41. Whilst I agree it is not sporadic or sprawling development extending the urban area as such, I disagree that this is “infill” development (6.2) as it is not filling in a vacant space or altering the density within an existing built-up urban fabric. It is bordered by open space to the north and west. It has state highways on two edges and is located at a gateway to Wanaka, and it is otherwise bordered by lower density RR, RL and LLR development. I also disagree it is an outcome consistent with urban development wrapping around Mt Iron on three sides. Open space notably bounds Mt Iron to the southeast and south (and a highway corridor). Moreover the residential development all around Mt Iron is of a lower density and of a different character.

Effects on Mt Iron ONF

42. I agree with the LAR that there would be no effects on the natural character, visual prominence, legibility and memorability of Mt Iron or on the biophysical values. The views of Mt Iron ONF including Little Mt Iron are very important views as I described earlier. The proposed development would obscure views of the ONF to a greater degree than the consented development as depicted in Visualisation 5 (SH6 north approach), Visualisation 8.1. SH84 and Visualisation 12 on SH6. This is because there is built form over the western half and buildings are much closer to the viewer along all road boundaries as well as including three storey forms. I accept that tree planting on the Site could have the same effect (and it has previously, however those trees were more rural in character). Regardless there is an opportunity now to protect the more open views of Mt Iron so it can be appreciated as an entity from base to summit and in relation to the moraine and outwash landforms at its base. That was clearly a key feature of the

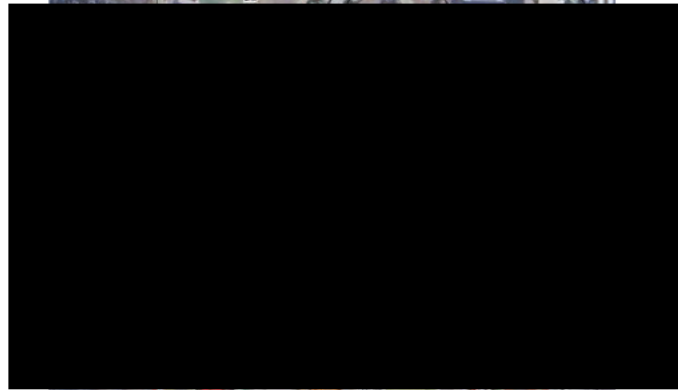
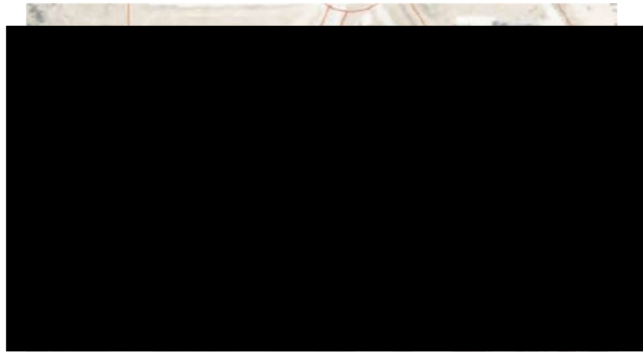
negotiated solution approved by Environment Court and currently consented on the Site.

43. The Site as stated earlier is the visual plinth or foreground to Mt Iron. The visual quality and character of the foreground affects the appreciation of Mt Iron. For a period of some 15-20 years built form would be dominant in the foreground, particularly the pale coloured buildings. The zig-zag roof form of the terrace housing is prominent in Visualisation 12.1. The built forms in the foreground of these views are distracting visual elements that would persist for many years. They do not in my view have an architectural form and aesthetic that complements the distinctive, unique, rugged natural character of Mt Iron. It is also my opinion that any built “hard” development at the base of Mt Iron that is part of the plinth or foreground in the views in and around Junction Roundabout should be visually incidental and subservient, with a predominant “soft” vegetated appearance in keeping with the broader highway corridors and the vegetated base and sides of Mt Iron. It should not detract or distract from the dominant and iconic natural feature of Mt Iron.
44. It is unlikely in my opinion that the proposed planting would grow to form a vegetated foreground such that it would overcome the distracting effect of the built form, given it covers the entire Site either side of the central area with very little space within the Scheme for large-scale planting and many of the trees are deciduous. I also do not consider it would “*merge with Mount Iron’s backdrop vegetation*” (part 5.3.1) to the extent it would provide effective mitigation. Many of the trees that would be visible are deciduous, some with bold colourful autumn foliage. Rather than blending these would contrast with the predominant kanuka and grey shrubland vegetation on Mt Iron (assuming the hawthorn and wilding cherry trees would be removed from the Reserve within the next 10-20 years). The contrasting effect is shown in Visualisation 5.3. and 12.3.
45. In conclusion, the experiential value of appreciating Mt Iron in high profile public views from the highways and adjacent footpaths would be adversely affected to a Moderate degree in my opinion, possibly High

in the short term to medium term until tree vegetation has a softening and filtering effect.

Effects on Neighbouring Property of [REDACTED] (CM and JC Morgan Family Trust)

46. The Morgan's property immediately adjoins the north boundary of the proposed housing scheme as identified by the yellow star in the left screen shot below from the Overall Masterplan in the GA1 Sheet 09. The right image is a screen shot from the consented masterplan 2021.



47. I visited [REDACTED] on 18 June and observed views into the Site from various places around the property. The LAR is correct that the outdoor living area is on the north side of the dwelling. However as the Site boundary is on a northeast-southwest alignment

there are views directly east along the patio into the Site (and potentially of the units hard on the boundary).

48. The primary views from the Morgans's upstairs master bedroom and deck, through a feature window on the stairs, and from a downstairs bedroom and the kitchen are to the east/southeast, towards the Site. The downstairs guest bedroom patio faces east towards the Site. As described above there is also exposure to the east from the outdoor living area.
49. The T2 (5m tall) and T3 (7.7m tall) housing units would butt up to the shared boundary, within 2-10 metres. The upper parts of the taller units would be visible over the boundary cypress hedge from within the dwelling at ground level as well as from the first storey, and from places within the garden. The hedge is currently some 4m tall. In the absence of the cypress hedge there would be much fuller visibility in close proximity.
50. The close proximity of the units would also result in noise, potentially smells (such as wafting smoke) and night lighting effects on the Morgans's property.
51. The LAR assesses the degree of potential adverse effect on the Morgans's amenity to be Low-Moderate to Low. The reasons given are the mitigating effect of vegetation on the property boundary, the primary view to the north away from the Site, mitigating proposed planting between the boundary and the built form, the appearance of the buildings being attractive with a modular facade, and the north-facing windows being 10m from the boundary, being bedroom windows with living room windows (and the outdoor spaces) being set back a few metres more.
52. The vegetation within the property cannot be relied upon and should not be taken into account, certainly not for the life of the housing scheme (as acknowledged in the LAR). Moreover, the tall hedge on the Morgans's property would most likely be encouraged to grow to at least 6m to screen out the Site's buildings. This would excessively shade the new terrace units behind it. Notwithstanding, the potential for on-site

planting to provide effective screening appears to be very limited due to the absence of space, vegetation would not be an effective mitigation measure for very close and/or two-storey buildings because of shading. Planting would also not mitigate the effects of noise, and would have limited efficacy on night lighting and, potentially, smell.

53. The proposed setbacks of the terrace units is insufficient in my opinion to avoid adverse effects of at least Moderate or possibly higher degree on the Morgans' amenity such as on their privacy and intrusive noise, smell and night lighting. The degree of intrusion and thus adverse effect through intervisibility would need to be confirmed with profile poles put up to mark the terrace units.
54. The extent, density and proximity of residential development with respect to potential for amenity effects on the Morgans' property is unanticipated for a rural zoned site, or even relative to a development pattern more consistent with the ambient context. The minimum setback standard for a rural site is 15m for private amenity reasons. Furthermore, these effects are not associated with the consented development, as the linear parcel of land was not part of the Site then and provided an effective 40m wide open space buffer in addition to an 8-10m setback along the boundary of the Site (as it was then).
55. Whilst it is the Morgans' prerogative to describe the potential and likely effects on their private amenity, in my opinion based on my site visit, the effect on their amenity would be adverse to a Moderate-High degree.
56. In my opinion there are some changes that could be made to the Proposal that would mitigate these effects. I will outline these in my recommendations.

CONCLUSIONS

57. I concur that the Site is zoned Rural and that it is not within the Urban Growth Boundary or within future urban expansion areas. I agree that the overall landscape character is peri-urban. The Site immediately adjoins Mt Iron, an ONF and the Mt Iron Reserve. The location of the UGB may at first glance appear anomalous, however finer-scaled

analysis reveals good reasons in my opinion for the location, and persistence of rural zoning. The rural zoning is not an isolated pocket, but contiguous with Mt Iron Reserve.

58. The relevant context landscape is correctly identified, although the most relevant urban area is the upper terrace of Albert Town.
59. The assessment has not analysed the ambient urban character, which is characteristically low-density stand-alone dwellings of LLR, RR and RL zonings, with no terracing, repeated forms, grid patterns or straight lines. The existing consented development would not confer an urban character to the whole Site. It would be more consistent with the overall peri-urban character, containing large areas of open space.
60. In my opinion, the Site retains an important rural landscape characteristic of open space taking into account the consented development and acknowledging it is contiguous with Mt Iron Reserve. The Site contributes value as part of the open space corridor along SH84 and to a lesser extent SH6. It is an open foreground to impressive views of Mt Iron. The Site is located at the prime “gateway” to Wanaka and is very important as the foreground and visual plinth to Mt Iron. The proposed green corridor on the north side of SH84 includes the Site.
61. In my opinion the Site has Moderate capacity for urban-type development and there are certain parameters that should be met to protect the values of the Site.
62. The key landscape issues relate to maintaining or enhancing rural landscape values particularly visual amenity where it is highly visible; avoiding urban development outside the UGB and in rural zones in part to maintain rural landscape values) but also to; achieve compact urban form with a defensible edge; sensitive response to ambient urban patterns to integrate well; to protect the landscape values of the Mt Iron ONF; and to mitigate adverse effects on private amenity of directly adjoining neighbours.
63. The urban development would be within a rural zone and outside the Urban Growth Boundary and is not within future Urban Expansion

areas. Rural landscape character would not be maintained or enhanced, particularly the attributes of openness and spaciousness. The Site is highly visible from public areas and adverse effects on visual amenity would not be avoided, particularly with respect to important view of Mt Iron and in the context of the prime gateway to the place of Wanaka. The LAR is incorrect in my opinion where it concludes that the Site has no rural attributes, does not have rural character and there is no need to assess rural landscape values and effects on visual amenity in the context of rural landscape. I agree with the LAR that there would be a loss of openness due to a high density of multi-storey and repetitive built form right across the Site. This would be a complete loss. The LAR is also incorrect in my opinion in assuming a standard Residential zoning with monotonous development as the alternative outcome. That is not reflected in the existing consented environment either.

64. It is my opinion that whilst the west side of SH6 and Riverbank Road would form a defensible UGB per se, that the UGB is appropriately located where it is, in order to recognise at a finer grain the important gateway experience within an open space corridor along SH84, presided over by the dramatic form of Mt Iron ONF. I disagree that the UGB does not reflect the actual character including the existing consented development.
65. The proposed development would not in my opinion be consistent with the ambient urban character in pattern and typology. In fact, it shares very little in common. Some of the typologies proposed are also inappropriate as part of the foreground to Mt Iron, distracting from the view of the ONF. I agree with the LAR that such development is more commonly associated with larger built up urban areas such as Three Parks. I disagree that the proposal is "infil" as it is not a site within a built up urban area.
66. I agree with the LAR there would be no effects on the inherent values of the Mt Iron ONF. The proposals would however adversely affect the appreciation of views of Mt Iron in a high profile gateway location. I consider the degree of adverse effect to be at least Moderate and

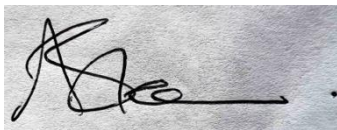
possibly High in the shorter term. I disagree that the proposed vegetation would blend the proposal with the vegetation on Mt Iron.

67. There is potential for adverse effects on the private amenity of [REDACTED] [REDACTED] to at least a Moderate degree, possibly higher due to the proximity of the proposed terraced housing. The proximity is unanticipated and inconsistent with what has been consented, and with a rural zoning.

RECOMMENDATIONS

68. In order to address the concerns of the Morgans at [REDACTED] [REDACTED] the following measures are recommended:
- (a) Set terraced houses back at least 15m from the boundary with a 5m wide (minimum) strip of at least two lines of evergreen native shrub and tree planting along the boundary on the Site. This is to form a dense screen from ground level to at least 6-7m tall. Positioning of trees to be finalised on site to block actual sightlines between the east and south-facing windows, upstairs deck, and ground level patios and entry area of the dwelling at [REDACTED] [REDACTED] and the windows and outdoor living areas of the residential buildings on the site
 - (b) Ensure all night lighting would be designed to avoid any glare or spill over the boundary.
 - (c) Enclose outdoor living areas with solid fences or walls to absorb sound.
 - (d) To address the adverse effects on the views of Mt Iron ONF the following measures are recommended:
 - (e) Maintain a more open landscape character over the west part of the Site consistent with the consented development, to maintain more open and natural views of the ONF

- (f) Review the architectural typologies to ensure a more recessive and subservient and/or complementary built form aesthetic responding to the rugged natural form of Mt Iron and acknowledging the high-profile gateway location
- (g) Review the proposed vegetation to provide a vegetative foreground more consistent with the natural character of Mt Iron (predominant use of evergreen local native species)
- (h) To address the adverse effects on existing urban form and character the following measures are recommended:
 - (i) Review the built form typologies and spatial pattern to be more consistent and integrate with the ambient urban character
 - (j) recognise the open space corridor and set back of the UGB along SH84, including provision for the envisioned green pathway
 - (k) avoid emphasizing the long straight north boundary

A handwritten signature in black ink, appearing to read 'Anne Steven', with a long horizontal stroke extending to the right.

Anne Steven
Registered Landscape Architect
WANAKA

19 June 2026

APPENDIX

to the Landscape Memorandum of
Anne Steven
Landscape Architect WANAKA

19 June 2026

Extracts Relevant to Landscape Matters from the Proposed Queenstown Lakes District Plan (access on line 18 June 2026)

Note: Highlighted extracts are those referred to in the RMM Landscape Assessment Report.

Part 3 STRATEGIC OBJECTIVES

3.1A Strategic Issues

- a. Strategic Issue 2: Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscapes, particularly its outstanding natural features and outstanding natural landscapes.
- b. Strategic Issue 3: High growth rates can challenge the qualities that people value in their communities.

3.1B.5

- b. 'Landscape capacity':
 - ii. in relation to a landscape character area in a Rural Character Landscape, means the capacity of the landscape character area to accommodate [subdivision and development](#) without compromising its identified landscape character and while maintaining its identified visual [amenity values](#);

3.2 Strategic Objectives

3.2.2 Urban growth is managed in a strategic and integrated manner.

3.2.2.1 [Urban development](#) occurs in a logical manner so as to:

- a. promote a compact, well designed and integrated urban form;
- b. build on historical urban settlement patterns;
- c. achieve a built environment that provides desirable, healthy and safe places to live, work and play;
- d. minimise the natural hazard risk, taking into account the predicted effects of climate change;
- e. protect the [District's rural landscapes from sporadic and sprawling urban development](#);
- f. ensure a mix of housing opportunities including [access](#) to housing that is more affordable for residents to live in;
- g. contain a high quality network of [open spaces](#) and community facilities; and
- h. be integrated with existing, and proposed infrastructure and appropriately manage effects on that infrastructure.

3.2.3 A quality built environment taking into account the character of individual communities (*addresses Issues 3 and 5*)

3.2.3.2 Built form integrates well with its surrounding urban environment.

3.2.5 The retention of the District's distinctive landscapes. (*addresses Issues 2 and 4*)

Outstanding Natural Features and Outstanding Natural Landscapes

3.2.5.3 In locations other than in the Rural Zone, the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected from inappropriate [subdivision](#), use and development.

Rural Character Landscapes

3.2.5.5 Within Rural Character Landscapes, adverse effects on landscape character and visual [amenity values](#) from [subdivision](#), use or development are anticipated and effectively managed, through policies and rules, so that:

- a. landscape character is maintained; and
- b. visual [amenity values](#) are maintained or enhanced.

3.2.5.6 In Rural Character Landscapes, new [subdivision](#), use and development in proximity to any Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Feature or Landscape.

Urban Development

3.3.15 Apply provisions that enable [urban development](#) within the UGBs and avoid [urban development](#) outside of the UGBs.

3.3.16 Locate [urban development](#) of the settlements where no [UGB](#) is provided within the land zoned for that purpose.

Outstanding Natural Features and Landscapes and Rural Character Landscape

3.3.30 Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.

Landscape Assessment Methodology

3.3.45 Landscape assessments shall:

- a. for Outstanding Natural Features and Outstanding Natural Landscapes:
 - i. identify landscape attributes and values; and
 - ii. assess effects on those values and on related landscape capacity;
- b. for Rural Character Landscapes:
 - i. define a relevant landscape character area and its wider landscape context;
 - ii. identify the landscape character and visual [amenity values](#) of that landscape character area and within its wider landscape context; and
 - iii. assess effects on that character and those values and on related landscape capacity;
- c. in each case apply a consistent rating scale for attributes, values and effects.

3.3.46 The Landscape Assessment Methodology required by [SP 3.3.45](#) is to be implemented when assessing:

- b. a resource consent application for the [subdivision](#), use or development of land where:
 - i. the application is for a restricted discretionary, discretionary or non-complying activity; and
 - ii. the proposal is in relation to land within an Outstanding Natural Feature or Outstanding Natural Landscape or gives rise to landscape effects and is on land with Rural zoning;

4 URBAN DEVELOPMENT

4.1.2 Housing Bottom Lines

- note that the Site along with the RL land around the north end of Riverbank Road and land opposite on east side of SH6 is not part of the QL urban environment and is not part of the Indicative Future Expansion Area (mainly to the south into Hillend). It lies outside the UGB.

An urban environment means any area of land that is, or is intended to be, predominantly urban in character and that is, or is intended to be, part of housing and labour market of at least 10,000 people.

4.2 Objectives and Policies

4.2.1 Objective - Urban Growth Boundaries used as a tool to manage the growth of urban areas within distinct and defensible urban edges. (from [Policies 3.3.13](#) and [3.3.14](#))

4.2.1.3 Ensure that [urban development](#) is contained within the defined [Urban Growth Boundaries](#), and that aside from [urban development](#) within existing towns and rural settlements, [urban development](#) is avoided outside of those [boundaries](#).

Upper Clutha Basin Specific Policies

4.2.2.22 Define the [Urban Growth Boundaries](#) for Wānaka and Lake Hāwea Settlement, as shown on the District Plan web mapping application that:

- a. are based on existing urbanised areas;

- b. identify sufficient areas of [urban development](#) and the potential intensification of existing urban areas to provide for predicted visitor and resident population increases in the Upper Clutha Basin over the planning period;
- c. have community support as expressed through strategic community planning processes;
- d. utilise the Clutha and Cardrona [Rivers](#) and the lower slopes of Mt. Alpha as natural [boundaries](#) to the growth of Wānaka; and
- e. avoid sprawling and sporadic [urban development](#) across the rural areas of the Upper Clutha Basin.

4.2.2.23 Rural land outside of the [Urban Growth Boundaries](#) is not used for [urban development](#) until a change to the Plan amends the [Urban Growth Boundary](#) and zones additional land for [urban development](#) purposes.

6.3.1.1 Categorise the Rural Zoned landscapes in the [District](#) as:

- a. Outstanding Natural Feature ([ONF](#));
- b. Outstanding Natural Landscape ([ONL](#));
- c. Rural Character Landscape ([RCL](#))

6 Landscapes and Rural Character

6.3.2 Managing Activities in the Rural Zone, the Gibbston Character Zone, the Rural Residential Zone and the Rural Lifestyle Zone

6.3.2.1 Avoid [urban development](#) and [subdivision](#) to urban densities in the rural zones.

6.3.2.7 Ensure that [subdivision and development](#) in the Outstanding Natural Landscapes and Rural Character Landscapes in proximity to an Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Outstanding Natural Feature or Outstanding Natural Landscape

6.3.4 Managing Activities in Rural Character Landscapes

6.3.4.4 Have particular regard to the potential adverse effects on landscape character and visual [amenity values](#) where further [subdivision and development](#) would constitute sprawl along [roads](#).

6.3.4.5 Ensure incremental changes from [subdivision and development](#) do not degrade landscape character, or important views as a result of activities associated with mitigation of the visual effects of proposed development such as screen planting, mounding and [earthworks](#).

6.3.4.8 Avoid adverse effects on visual [amenity](#) from [subdivision](#), use and development that:

- a. is highly visible from [public places](#) and other places which are frequented by members of the public generally (except any [trail](#) as defined in this Plan); or
- b. forms the foreground for an Outstanding Natural Feature or Outstanding Natural Landscape when viewed from public [roads](#)

6.3.4.10 In the Upper Clutha Basin, [subdivision and development](#) maintains open landscape character where that is the existing character of the Rural Character Landscape

21 RURAL LANDSCAPE

21.2 Objectives and Policies

Objective - A range of land uses, including farming are enabled while:

- a. Protecting the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes;
- b. Maintaining the landscape character of Rural Character Landscapes and maintaining or enhancing their visual amenity values;
- c. Maintaining or enhancing amenity values within the rural environment; and
- d. Maintaining or enhancing nature conservation values.

21.2.1.3 Require [buildings](#) to be set back a minimum distance from [internal boundaries and road boundaries](#) in order to mitigate potential adverse effects on landscape character, visual [amenity](#), outlook from neighbouring properties and to avoid adverse effects on established and anticipated activities.

21.2.1.4. Minimise the dust, visual, noise and odour effects of activities by requiring them to locate a greater distance from [formed roads](#), neighbouring properties, [waterbodies](#) and zones that are likely to contain [residential](#) and [commercial activity](#).

21.2.1.5 Have regard to the location and direction of lights so they do not cause glare to other properties, [waterbodies](#), [roads](#), [public places](#) or views of the night sky.

p27Future Urban Areas

A limited amount of land is expected to change from rural to urban uses over the next 30 years. These locations are identified as future urban areas on maps 6-8.

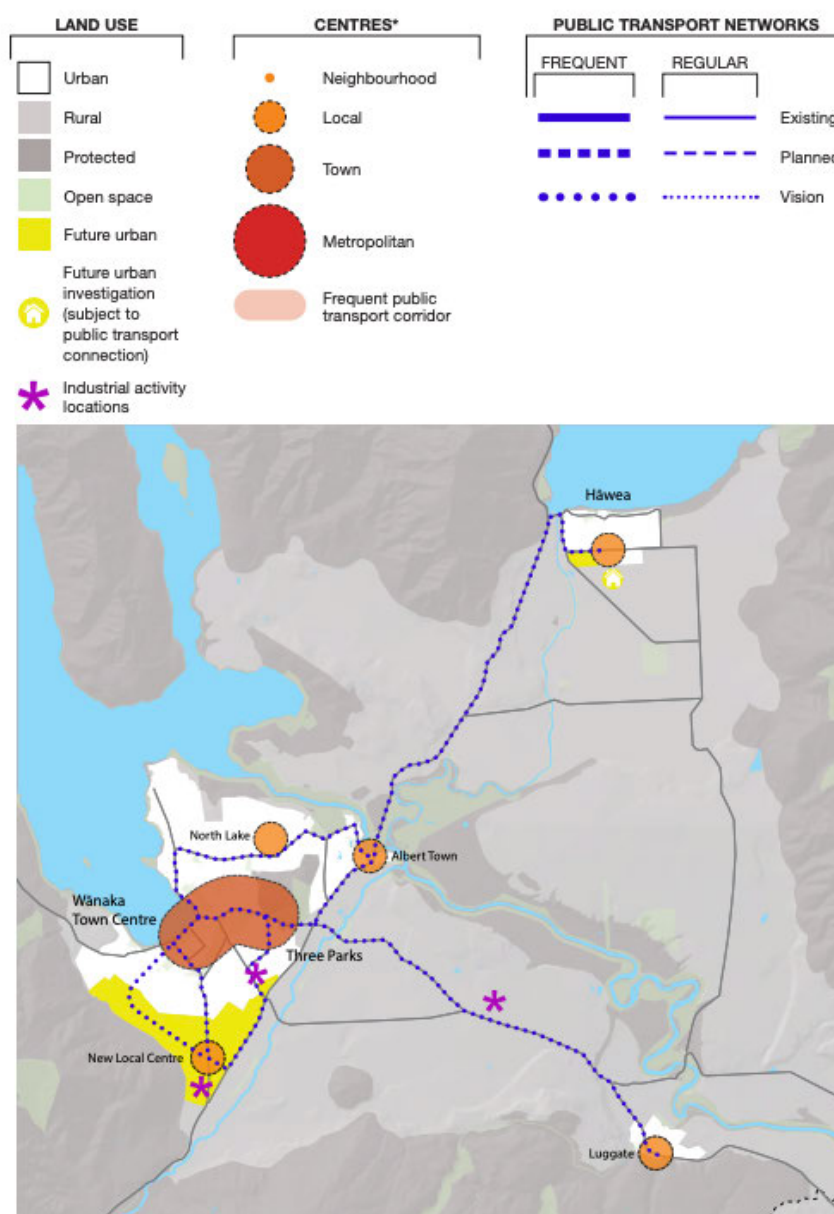
P27 Rural areas

The consolidated approach to growth aims to preserve the character and values of the rural areas of the Queenstown Lakes. Enabling further growth beyond what is already provided for in the District Plan is not consistent with the consolidated approach to growth promoted by the Spatial Plan.

P32 Urban extent

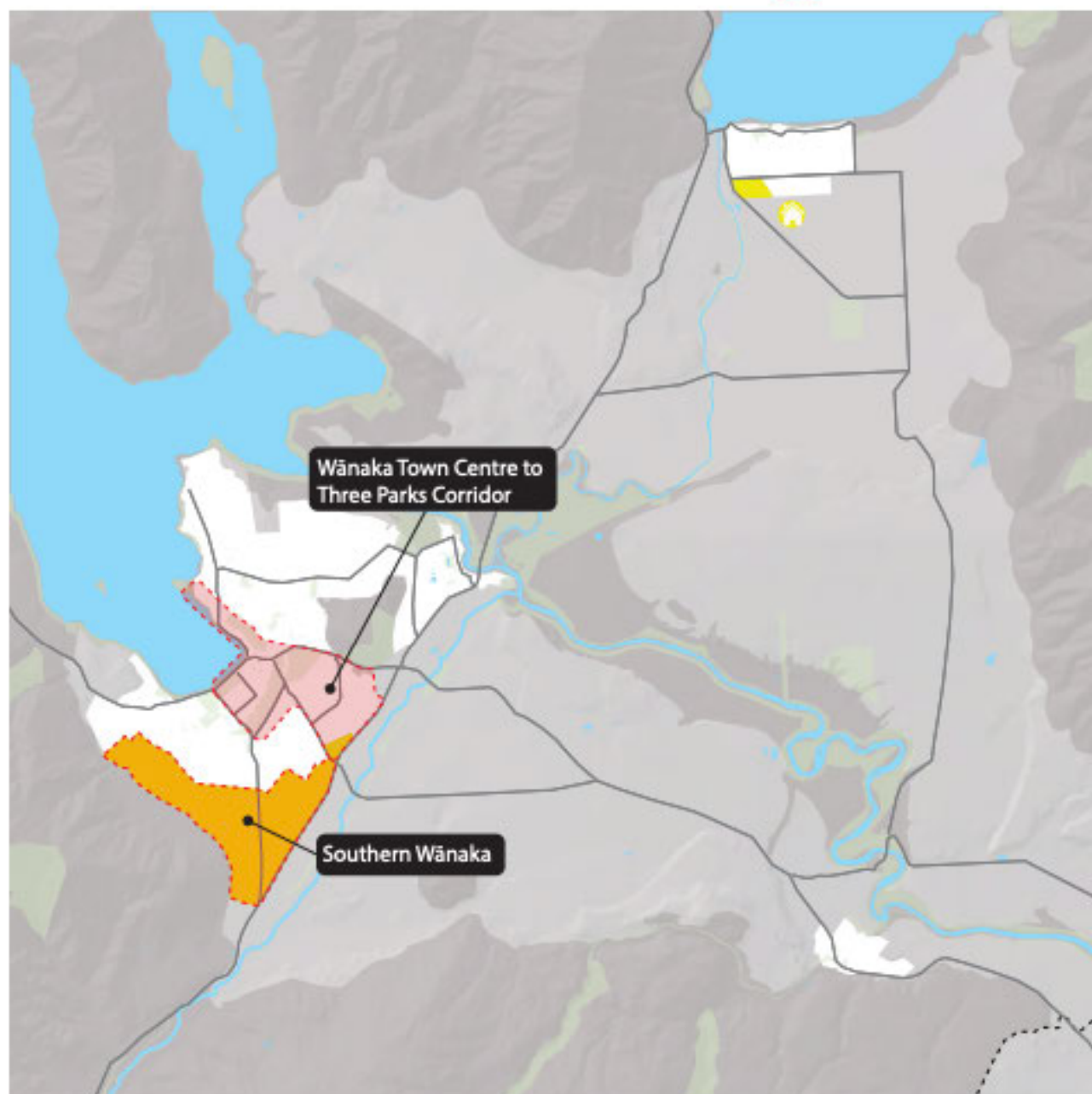
The urban extent of Wānaka is consolidated within the area bound by the Cardrona and Clutha Rivers. Two new future urban areas are identified for investigation. There is an opportunity for Wānaka to expand to the south-west, towards the Cardrona Valley, up to the area bound by the Outstanding Natural Landscape.

MAP 8: UPPER CLUTHA – SPATIAL ELEMENTS



MAP 10: UPPER CLUTHA – PRIORITY DEVELOPMENT AREAS

-  Urban
-  Rural
-  Protected
-  Protected area (open space)
-  Future urban
-  Future urban investigation
(subject to public transport connection)
-  Priority development area



MAP 17: UPPER CLUTHA – BLUE GREEN NETWORK AND SOCIAL INFRASTRUCTURE

