



FORM 5: SUBMISSION

ON NOTIFIED PROPOSED DISTRICT PLAN OR PLAN
CHANGE OR VARIATION OR POLICY STATEMENT



Clause 6 of Schedule 1, Resource Management Act 1991



TO // Queenstown Lakes District Council

Name of submitter [full name] Treespace No.1 Limited Partnership

This is a submission on the following proposed policy statement (or on the following proposed plan or on a change proposed to the following policy statement or plan or on the following proposed variation to a proposed policy statement or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing policy statement or plan) (the **proposal**):



NAME OF // Proposed or existing policy statement or plan and (where applicable) change or variation

I could / could not**

gain an advantage in trade competition through this submission.

*I am / am not**

directly affected by an effect of the subject matter of the submission:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

** Select one.



SPECIFIC PROVISIONS // Of the proposal that my submission relates to are:

[give details] This submission relates to the variation to the PDP that deals with the Landscape Priority Areas.



MY SUBMISSION

[Include: whether you support or oppose the specific provisions or wish to have them amended; and reasons for your view]

This submission opposes certain aspects of the Central Wakatipu Basin Priority Area ONL (21.22.15).

*If your submission relates to a proposed policy statement or plan prepared or changed using the collaborative planning process, you must indicate the following:

- > whether you consider that the proposed plan or policy statement or change fails to give effect to a consensus position and therefore how it should be modified; or
- > in the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan or policy statement should be modified.

* This paragraph may be deleted if the proposal is not subject to a collaborative planning process.

**I SEEK THE FOLLOWING DECISION // From the local authority**

[give precise details]

That the Central Wakatipu Basin Priority Area ONL (21.22.15) is amended in accordance with this submission.

*I wish / do not wish**

to be heard in support of my submission.

I will / will not**

consider presenting a joint case with others presenting similar submissions.

* In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.

** Select one.

SIGNATURE

**Signature

[or person authorised to sign on behalf of submitter]

Date 26 August 2022

** A signature is not required if you make your submission by electronic means.

YOUR DETAILS // Our preferred methods of corresponding with you are by email and phone.

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Postal Address P O Box 1081
[or alternative method of service Queenstown
under section 352 of the Act]

Post code

Contact person [name and designation, if applicable] Scott Freeman

NOTE // To person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- > it is frivolous or vexatious:
- > it discloses no reasonable or relevant case:
- > it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- > it contains offensive language:
- > it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



22 August 2022

Queenstown Lakes District Council
VIA EMAIL

Dear Sir/Madam

**VARIATION TO THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN
LANDSCAPE SCHEDULES 21.22 & 21.23**

SUBMISSION FROM TREESPACE No.1 LIMITED PARTNERSHIP

Introduction

Southern Planning Group is assisting Treespace No.1 Limited Partnership (TNLP) in relation to a submission that addresses the variation to the Proposed District Plan (PDP) which specifically deals with Landscape Schedules 21.22 and 21.23.

TNLP is the owner of the land that is contained within Mt Dewar Station (Mt Dewar). Mt Dewar encompasses 1,768 hectares of land that adjoins the residential settlement of Arthurs Point and is also bounded by Coronet Peak Road, Skippers Road, and the Shotover River.

The legal description of the land contained within Mt Dewar is described as Section 2-6 Survey Office Plan 24648 and Section 1 Survey Office Plan 345973 and Lot 7 Deposited Plan 477149 and Lot 2 Deposited Plan 481806.

Within the variation to the PDP, Mt Dewar is contained within the 'Central Wakatipu Basin Priority Area ONL' (21.22.15). This submission recommends various changes to this Priority Area (and subsequently opposing some of the current notified provisions).

TNLP considers that some of the 'descriptors' that apply to Central Wakatipu Basin Priority Area ONL are reasonably generic and do not accurately reflect the differing quality and categories of landscapes and landforms within this ONL including the capacity of some of the land to accommodate further appropriate development (of varying types).

In addition, the stated 'naturalness, remoteness, and wilderness attributes and values', while accurate for select hinterland areas, do not recognise the effects of the close proximity of the Central Wakatipu Basin Priority Area to established settlements including Arthurs Point Village, the effects of the existing and consented tourism activities, commercial tourism facilities, rural living, exotic forestry, and visitor accommodation as they relate to this category.

TNLP considers that the Landscape Capacity recommendations do not adequately consider the renewable energy needs for the Queenstown area (and wider region) now and in the future. To reach the carbon neutral and renewable energy goals at National and Local government level, and to create the opportunity for local

communities to have a higher degree of resilience, TNLP strongly recommends that there should be an opportunity to locate community-scale renewable energy in appropriate locations within certain ONL's. Stating that there is no-capacity for such renewable energy installations significantly restricts the ability to achieve local environmental goals and restricts future generations that need to have these options available.

As such, TNLP recommends a number of amendments to the provisions contained within Schedule 21.22.15, which better reflect the current characteristics of the land and the capacity to accommodate a range of development and activities.

Resource Management Planning Background

TNLP via Treespace Queenstown Limited obtained resource consent (RM181638) that authorised a comprehensive undertaking for the land contained within Mt Dewar.

First and foremost, RM181638 involved the re-establishment of a beech forest on Mt Dewar, together with regenerating the balance of the property. The subdivision associated with RM181638 also allowed for the future development of 37 small footprint cabin sites, 10 large chalet sites, a lodge site, an amenity building and associated infrastructure and four landscape encampments across the back-country zone.

The plans contained within **Appendix [A]** indicates the land contained within Mt Dewar, the area of land to be reforested, recreation areas and finally the land that can be developed in accordance with RM181638.

All of the building development proposed would be located on the lower part of the front faces, to the north of Arthurs Point village and west of Coronet Peak Road. The front faces are within the smaller portion of the property south of the Devils Creek Conservation Area.

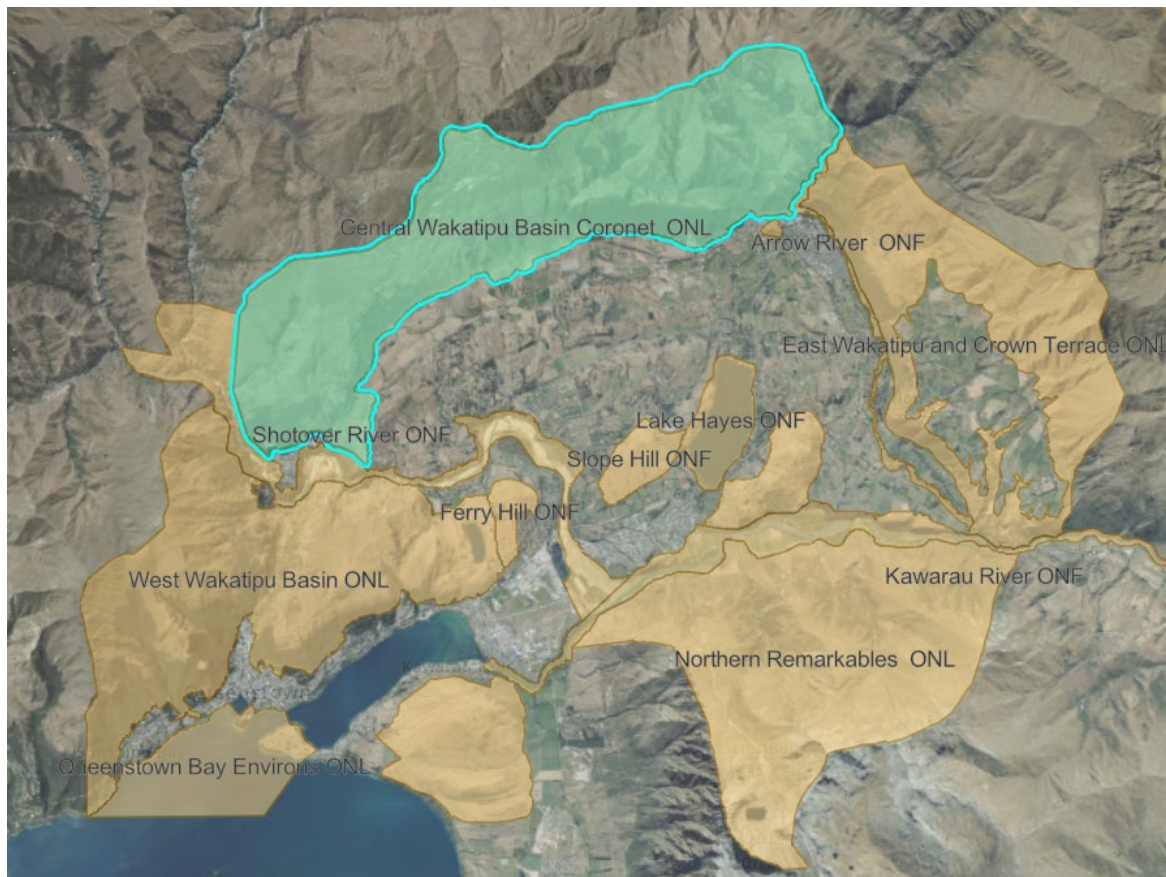
The consent holder is currently in the process of giving effect to RM181638, including the establishment over 70 hectares of beech trees on the front Wakatipu-face of Mt Dewar, removal of wilding pines, pest eradication, and finally, civil works are expected to start this coming summer.

Central Wakatipu Basin Priority Area ONL (21.22.15)

The variation states the following as the general description for the Central Wakatipu Basin Priority Area ONL:

The Central Whakatipu Basin PA ONL encompasses the steep western end southern slopes of Mount Dewar and the steep south-facing slopes of Coronet Peak, Brow Peak and Pt 1120 near Big Hill, taking in German Hill and Pt 675. Collectively the mountain slopes form the northern backdrop to the Whakatipu Basin and Arrowtown. The western edge of the PA ONL adjoins Kimiākau (Shotover River) PA ONF and the eastern end adjoins the Haehaenui (Arrow River) PA ONF.

The Central Wakatipu Basin Priority Area ONL is indicated below:



It is noted that one 'encampment' accommodation area associated with Mt Dewar is located within the West Wakatipu Basin ONL.

In making the recommended amendments to the Central Wakatipu Basin Priority Area ONL, consideration should be given the landscape related observations that were made by the Commissioners in terms of RM181638.

The Commissioners for RM181638 determined that the quality of the ONL that the proposed development sits within is of a much lower landscape quality value than other ONL areas on higher elevations on Coronet Peak. This was in part one of the reasons as to why RM181638 was approved. The Commissioners also stated that "the lower part of the front faces of Mount Dewar have greater potential to absorb change than land within ONL's generally." The Commissioners also stated that they "consider that the proposal for development within a modified part of the ONL over Mount Dewar would not be an 'inappropriate' subdivision use or development."

Based on the above, the following recommendations are made to the Central Wakatipu Basin Priority Area ONL (with the headings/numbering following the notified version contained in the variation, ~~strikeout deleting text~~, new text being underlined).

Important land-use patterns and features

21. Built development patterning which includes a very limited scattering of rural and rural living dwellings around the margins of Arthurs Point; ~~the scattering of small-scale development within regenerating beech forest at Mount Dewar~~ the scattering of future visitor accommodation and rural living development within regenerating beech forest on Mount Dewar includes cabins, chalets, amenity facilities and a lodge, along with approximately 50km of publicly accessible hiking and biking trails; and the occasional farm building or dwelling towards the eastern end of the unit (adjacent the southern boundary of the PA). Generally, development is characterised by very carefully located and designed buildings that are well integrated by plantings and remain subservient to the more 'natural' landscape patterns. Elsewhere, the modest scale of buildings, together with their distinctly working rural character and sparse arrangement, ensures that they sit comfortably into the setting.

Naturalness attributes and values

65. ~~The 'seemingly' undeveloped character of Central Whakatipu Basin PA ONL set within an urban (Arthurs Point and Arrowtown) or mixed working rural and rural living (Whakatipu Basin) context, which conveys a relatively high perception of naturalness. The sporadic development of Central Whakatipu Basin PA ONL contrasts within an urban (Arthurs Point and Arrowtown) or mixed working rural and rural living (Whakatipu Basin) context. Since the nodes of development are confined, the remaining mountain slopes convey a relatively high perception of naturalness.~~ While modifications related to its forestry, pastoral (including farm buildings, rural dwellings, ponds, fencing, tracks, shelterbelts and the like), recreational, and infrastructure uses are visible, the sheer scale of the continuous high mountain-scape ensures that, for the most part, these elements remain subservient to more natural landscape elements, patterns, and processes.

Given that the central part of the PA contains a major modification in the form of Coronet ski field, it is not 'seemingly undeveloped'. The ski field and access road are the most significant modifications to the high alpine setting around the Wakatipu Basin. In addition, the Treespace development will consist of a significant number of buildings that will be sensitively situated within the ONL in the western part of the PA.

Memorability attributes and values

69. The appealing and engaging views of the continuous mountain slopes ~~'wall' of mountains~~ framing the north side of the Whakatipu Basin from a wide variety of public vantage points, with hummocky tops and secluded valleys in the hinterland. ~~The juxtaposition of the~~ These front faces form a large-scale and continuous rugged mountain sequence beside the basin landform, along with the magnificent broader mountain and lake context within which it is seen in many views, are also factors that contribute to its memorability.

While there are reasonably consistent slopes around the basin, there are also numerous hummocks and small-scale landforms that follow the drainage patterns. Some of the hummocky terrain on the upper slopes and streams/valleys behind the first ridgelines, such as Devils Creek or Bush Creek need to be acknowledged, since they provide opportunities to locate development without any visual impact on the basin.

Remoteness and wildness attributes and values

75. ~~A strong sense of remoteness at the western and north-eastern ends of the PA despite their respective proximity to Arthurs Point and Arrowtown, due to the contained nature of the area and the limited level of built development evident. A sense of remoteness can be experienced in parts of the PA that do not have a visual connection to the settled areas of the Whakatipu Basin or Coronet Peak ski field and access road, such as in the valleys and peaks of the hinterland.~~

Given that there is a strong visual connection between the PA and the settled Whakatipu Basin, the feeling of remoteness can only be experienced in areas that do not have a visual connection to the basin, such as Devil Creek, or major developments, such as Coronet Peak ski field.

76. ~~A sense of wildness across much of the PA as a consequence of the large scale and continuity of the majestic mountain range framing the northern side of the basin along with its generally 'undeveloped' and in places, seemingly unkempt character. The contrast with the 'settled' and more manicured character of the basin plays an important role in this regard. Such feelings are lesser in the parts of the PA where forestry and the ski field/access road are located. Due to the large scale and continuity of the majestic mountain range framing the northern side of the basin, the PA contrasts with the 'settled' and more manicured character of the basin. Due to the relatively easy access, presence of a ski field and forestry, as well as visual connection to the settled basin landscape feelings of wildness are limited in this PA.~~

As stated above, with the major modification of Coronet ski field it is not considered 'seemingly undeveloped'. It is the most significant modification to the high alpine setting around the basin. Given the easy accessibility of the PA through tracks and the ski access road the sense of wildness is limited to the more remote hinterland.

Summary of Landscape Values

81. **High perceptual values** relating to:

- c. ~~A moderate-high to high perception of naturalness arising from the dominance of natural landscape elements and patterns across the PA. A moderate-high perception of naturalness arising from the dominance of natural landscape elements and patterns in parts of the PA that are not affected by forestry and tourism development.~~
- d. ~~A strong Sense of remoteness and wildness throughout the western and north-eastern portions of the PA. can be experienced in the hinterland of the PA.~~

For reasons outlined above, this is considered that points 81 (c) and (d) are inaccurate.

Landscape Capacity

The landscape capacity of the PA ONL Central Wakatipu Basin for a range of activities is set out below.

- i. **Commercial recreational activities – limited** landscape capacity for activities that integrate with and complement/enhance recreation features; are able to be located to optimize the screening and/or camouflaging benefit of natural landscape elements; designed to be of a sympathetic scale, appearance, and character; integrate appreciable landscape restoration and enhancement; enhance public access and protects the area's ONL values.
- ii. **Visitor accommodation and tourism related activities – Limited ~~no~~ Very Limited** landscape capacity for tourism related activities and **Very Limited** landscape capacity for visitor accommodation activities that are: co-located with existing development; sited to optimise the screening and/or filtering benefit of natural landscape elements; designed to be visually recessive, of a modest scale and have a 'low key' ~~rural~~-alpine character; integrate appreciable landscape restoration and enhancement; enhance public access; and protects the area's ONL values
- iii. **Urban expansions – no** landscape capacity.
- iv. **Intensive agriculture – no** landscape capacity.
- v. **Earthworks –very limited** landscape capacity for earthworks associated with farming, built development, existing recreational and tourism related facilities, or public access tracks, that protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with natural landform patterns.
- vi. **Farm buildings –** in those areas of the ONL with pastoral land uses **very limited** landscape capacity for modestly scaled buildings that reinforce existing rural character.
- vii. **Mineral extraction – no** landscape capacity.
- viii. **Transport infrastructure – very limited** landscape capacity for trails that are: located to integrate with existing networks; designed to be of sympathetic appearance and character; integrate landscape restoration and enhancement; and protect the area's ONL values. **No** landscape capacity for other transport infrastructure.
- ix. **Utilities and regionally significant infrastructure – limited** landscape capacity for infrastructure that is buried or located such that they are screened from

external view. In the case of utilities such as overhead lines of cell phone towers which cannot be screened, these should be designed and located so that they are not visually prominent and/or co-located with existing infrastructure.

- x. **Renewable energy generation – no** landscape capacity for large scale commercial renewable energy generation activities; **limited** landscape capacity for discreetly located and small-scale community renewable energy generation that is not visible from within the Wakatipu Basin. Small scale is defined as being the supply of renewable energy to 100 residential dwellings or less.
- xi. **Production forestry – no** landscape capacity.
- xii. **Rural living – Very limited no** landscape capacity, where such activities are co-located with existing rural living development, sited to optimize the screening and/or filtering benefit of natural landscape elements; designed to be visually recessive, of a modest scale and have a ‘low key’ alpine character; integrate appreciable landscape restoration and enhancement; enhance public access; and protects the area's ONL values; otherwise there is **no** landscape capacity for rural living.

The suggested amendments to the landscape capacity for PA ONL Central Wakatipu Basin take into account a more detailed analysis of the Mt Dewar land (and further field within the PA). It has been determined that for certain activities, there is greater capacity to absorb such activities, over and above the notified version of the PA.

Yours Sincerely



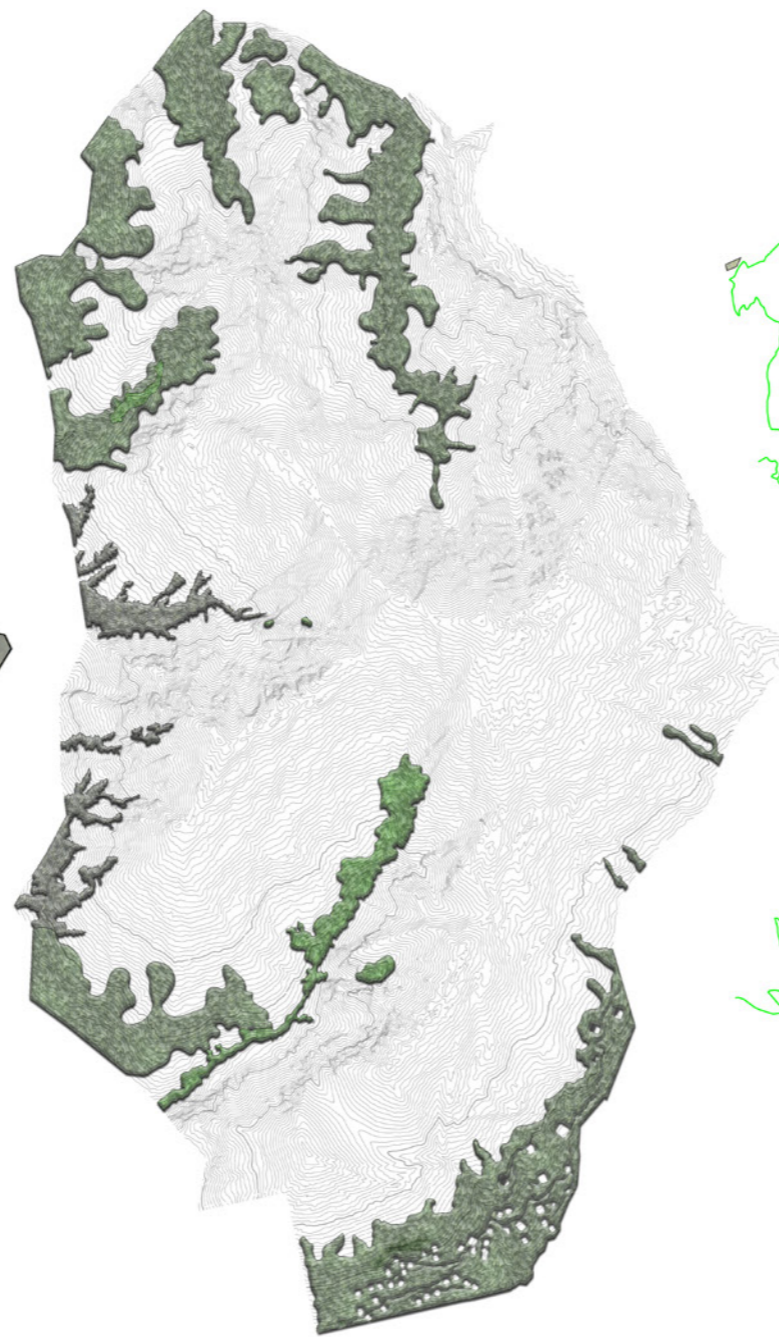
Scott Freeman
DIRECTOR
SOUTHERN PLANNING GROUP

APPENDIX A

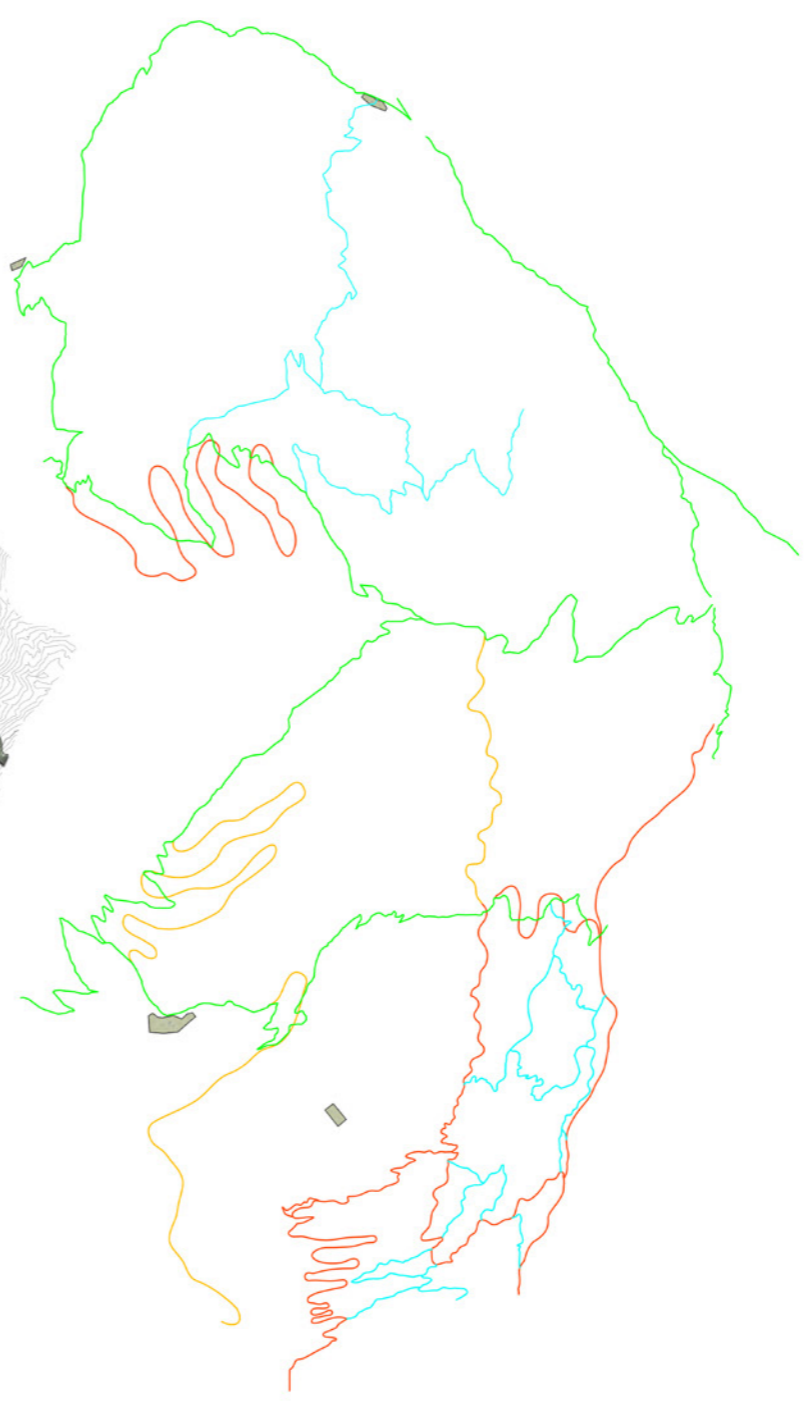
Treespace Plans



MT DEWAR



REFORESTATION



RECREATION



LIVING



KEY:

-  Tree Planting - each symbol represents a group of 20 trees, 15 years after planting
-  Indicative reforestation areas (after 50 years of tree planting and control)
-  Existing beech forest
-  Site boundary
-  Consented encampment areas
-  Proposed forest settlement area
-  Existing and proposed trails

