

**BEFORE THE CENTRAL OTAGO DISTRICT COUNCIL**

**IN THE MATTER** of a hearing on submissions on  
Proposed Plan Change 19 to the Operative Central  
Otago District Plan

**ON BEHALF OF** John Klevstul, Rowan Klevstul, and  
Rubicon Hall Road Limited (Submission 163)

*Submitter*

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**EVIDENCE OF BENJAMIN ESPIE (LANDSCAPE ARCHITECT)**

**16<sup>th</sup> May 2023**

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## **INTRODUCTION AND SCOPE OF EVIDENCE**

1. My name is Benjamin Espie. I hold the qualifications of Bachelor of Landscape Architecture (with honours) from Lincoln University and Bachelor of Arts from Canterbury University. I am a member of the New Zealand Institute of Landscape Architects and was the chairman of the Southern Branch of the New Zealand Institute of Landscape Architects between 2007 and 2016. I am also a member of the Resource Management Law Association. Since November 2004 I have been a director of Vivian and Espie Limited, a specialist resource management and landscape planning consultancy based in Queenstown. Between March 2001 and November 2004, I was employed as Principal of Landscape Architecture by Civic Corporation Limited, a resource management consultancy company contracted to the Queenstown Lakes District Council.
2. The majority of my work involves advising clients regarding the management of landscapes and amenity that the Resource Management Act 1991 provides and regarding the landscape provisions of various district and regional plans. I also produce assessment reports and evidence in relation to proposed development or proposed Regional and District planning provisions as they relate to landscape issues. The primary objective of these assessments and evidence is to ascertain the effects of proposed activities or provisions in relation to landscape character, values and visual amenity.
3. Much of my experience has involved providing landscape and amenity assessments relating to resource consent applications and plan changes both on behalf of District Councils and on behalf of private clients. I have compiled many assessment reports and briefs of Environment Court evidence relating to the landscape and amenity related aspects of proposed regimes of District Plan provisions in the rural areas of a number of districts including the Central Otago District.
4. The purpose of this evidence is to assist the Hearings Panel on matters within my expertise of landscape architecture and landscape planning in relation to Submission 163. In relation to this submission, I have been asked by the Klevstuls to prepare evidence regarding the landscape and visual effects of the revised requested relief in relation to the zoning that is sought in the southern part of Bannockburn. Mr James Lunday provides urban design evidence in relation to the requested relief and I do not comment on urban design issues such as how the requested relief might affect the overall functioning of Bannockburn as a township.

5. As well as giving evidence in relation to the John and Rowan Klevstul and Rubicon Hall Road Ltd (Submission 163), I have prepared a separate brief of evidence in relation to the submission of Stephen Davies (Submission 147). These two submission sites adjoin one another, therefore, the sections of this evidence that relate to broad-scale issues are common to both briefs of evidence.
6. As per the text of the submission, Submission 163 originally related to the Klevstul land (Lot 1 DP460583), the Parsons/Smith land (Lot 2 DP460583) and the Doctors Flat Vineyard land (or the Davies Land) (Lots 50 and 51 DP511592). This has since changed and the Submission 163 now only relates to the Klevstul land. I shall refer to this land (Lot 1 DP460583) as the Klevstul land or the subject site. Below, I summarise the relief that is sought in relation to the subject site.
7. I have visited the subject site and its surrounding vicinity a number of times.

## **EXECUTIVE SUMMARY**

8. The Klevstuls seek a southern extension to the LLRZ of Bannockburn township, providing a specific pattern of development over a rolling terrace that forms part of the northern flanks of Smiths Gully.
9. I consider that the extension of the notified LLRZ as sought by the Klevstuls is appropriate and logical in terms of landscape planning and will not lead to problematic adverse effects on landscape character, values or visual amenity. In relation to landscape issues, the outcome of the requested relief will accord with the results that are anticipated by the relevant statutory documents.

## **THE REQUESTED RELIEF**

10. The relief that is sought by Submission 163 is explained in detail in the evidence of Mr Giddens. Appendix A to this evidence shows the situation in the vicinity of the Submission 163 site as per PC19 as notified. Appendix B shows the situation as requested by the submission. In short, the submission seeks that LLRZ is extended over the Klevstul site and that specific provisions are included in the District Plan to the effect that:
  - A precinct is applied to the Klevstul site, Precinct 4, to enable a specific Policy and rules to apply to the site.

- The specific Policy is included that directs cluster or hamlet style development with significant open space and balance areas.
  - Standards requiring a lot size of 400m<sup>2</sup> and an average size of residential lots across the site shall be at least 1,000m<sup>2</sup>.
  - The evidence of Mr Lundy explains and illustrates the form of development that would be the result of these amendments.
  - A Structure Plan has also been prepared which could be included in the District Plan to further illustrate the expectations for the site, but which is not considered essential to achieve the outcomes sought under the submission.
11. As per the notified (and sought) provisions, if LLRZ is applied to the site, subdivision would be at least a restricted discretionary activity, with broad matters of discretion including matters relating to character, landscaping and the maintenance and enhancement of amenity values. AS well as the specific Policy mentioned above, guidance also comes from Objective LLRZ-02 and associated Policies which require the maintenance of amenity, character, spaciousness, outlook and the mitigation of visual effects.
12. In effect, the relief would mean Smiths Creek Gully becomes the southern edge to this particular part of Bannockburn township and that a specific type of southern edge comes about.

## LANDSCAPE RELATED GUIDANCE FROM STATUTORY DOCUMENTS

### Higher Order Documents

13. The protection of outstanding natural features and landscapes (**ONFs** and **ONLs**) from inappropriate subdivision, use, and development is a matter of national importance under the Resource Management Act 1991 (**RMA**), as is the protection of historic heritage from inappropriate subdivision, use, and development. Additionally, the RMA requires that particular regard shall be had to the maintenance and enhancement of amenity values and the quality of the environment.
14. The National Policy Statement on Urban Development 2020 (**NPS-UD**) is not primarily relevant to landscape issues. However, in the consideration of landscape issues, there is some degree of relevance in relation to the following:

*Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

*Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (b) *that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
  - (i) *may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
  - (ii) *are not, of themselves, an adverse effect*

15. I note that there is some debate as to whether the NPS-UD strictly applies. I leave that question to other witnesses and to legal submissions. However, I do agree that when amending a plan (or zone), this may then result in significant changes to a particular area; but those changes may not themselves necessarily be adverse. This is the case from a landscape perspective with or without the NPS-UD. A change from farmed land to regenerating native forest can be a significant change from a landscape perspective, for example, but not necessarily an adverse change. In the same way, the extension of a township onto rural zoned land is not necessarily adverse.
16. The Partially Operative Otago Regional Policy Statement gives high-level guidance regarding landscape issues. In very general terms, the landscape-related parts of this policy statement require the identification of ONLs and highly valued landscapes and set policies in relation to their management. Following a direction from the Minister for the Environment, the Otago Regional Council notified a new Proposed Regional Policy Statement on 26 June 2021. This policy statement is currently progressing through the hearing process, and as such little weight can be given to it. Given the particularly high-level nature of the Regional Policy Statement provisions, and given that I consider the relevant District Plan provisions are consistent with the Regional Policy Statement provisions and give effect to them, I have not taken direct guidance from the Partially Operative or Proposed Regional Policy Statements.

*The Operative District Plan*

17. The Operative Central Otago District Plan (**ODP**) is expectedly more location specific than the higher order statutory documents and therefore of more guidance. Section 2 of the ODP sets out

the Significant Resource Management Issues of the District and Section 2.3.1 sets out landscape issues specifically. In summary, relevant points are:

*“The Central Otago landscape is nationally (and internationally) renowned for its scenic quality. The physical landscape of the district is very much a product of geology, climate, and the early removal of forest on the mid slopes. More recent human activities have added an overlay at lower altitudes.*

*Remnant structures such as stone walls and associated decaying cottages are small in scale and add to rather than dominate the landscape. Former mining sites are now an integral and distinctive part of the District’s landscape, particularly in places such as St Bathans, Bannockburn and the herring bone tailings at Northburn”<sup>1</sup>.*

18. The ODP identifies ONLs, ONFs, Significant Amenity Landscapes (**SALs**) and Other Rural Landscapes (**ORLs**, being landscapes that are neither ONLs nor SALs). The ODP notes that:

*“Outstanding Natural Features and Outstanding Natural Landscapes are those subject to section 6(b) of the Resource Management Act 1991. Significant Amenity Landscapes are subject to section 7(c), albeit that Other Rural Landscapes in the District also have amenity values including those associated with the results of human endeavour as discussed above”<sup>2</sup>.*

19. With reference to Appendix C (large scale context plan), the valley south of Bannockburn Township (that I shall refer to as Shepherds Creek Valley) has a rolling and terraced valley floor that sits between the Cairnmuir Mountains to the east and the Carrick Range to the west. The steeper, rugged slopes of these two mountain ranges are categorised as being SALs, with their uppermost slopes being ONLs. This leaves the Shepherds Creek Valley itself as an ORL. The submission site sits relatively centrally in this valley, at the southern edge of Bannockburn township and is well removed from the SAL slopes, being at least 1.3km from the Carrick Range slopes at Pipeclay Gully Road, the closest SAL area.

20. Section 2.3.1 of the ODP then sets out two Significant Issues relating to landscape, being the appropriate management of ONFs and ONLs, and of Central Otago’s unique and distinctive landscape overall. These issues lead to the relevant Objectives and Policies of the RU in Chapter 4 of the ODP.

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<sup>1</sup> Operative District Plan, Section 2.3.1.

<sup>2</sup> Ibid.

21. Under the notified situation, the submission site remains zoned RU (and I am not aware of any consideration being given to its amendment as part of the development of Plan Change 19). The Shepherds Creek Valley, extending away to the south of Bannockburn township is also RU. Chapter 4 of the ODP sets out a planning regime for the RU and includes Objectives and Policies that relate to ONLs and ONFs specifically and then others that relate to landscape and amenity values generally. Setting aside the ONL / ONF provisions for now, the relevant Objective that applies to the rural land of the Shepherds Creek Valley is:

*4.3.3 Objective - Landscape and Amenity Values*

*To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.*

22. Policies 4.4.2 and 4.4.10 then flow from this Objective. Effectively, they seek to maintain landscape and amenity values and give emphasis to hills and ranges.
23. In summary regarding the ODP, emphasis is given to maintaining the identified ONLs and SALs, as is expected by the RMA. However, landscape and amenity values of rural landscapes generally are also to be maintained, albeit that the ODP recognises that the ORLs (such as the Shepherds Creek Valley) are not valued as highly in landscape terms as the ONLs and SALs. In relation to the relevant vicinity and the submission, the RU provisions described above would continue to apply to the land outside of the determined edge of the LLRZ, while residential development (consistent with the provisions sought) would be enabled inside the LLRZ.

*Non-Statutory Documents that give guidance regarding landscape issues*

24. Appendix D to this evidence is an excerpt from a district-wide landscape assessment undertaken in 2005/2006 by LA4 Landscape Architects (the District-Wide Landscape Assessment). This landscape assessment, in conjunction with a community consultation programme, formed a "Rural Review" that was used to inform a number of Plan Changes in relation to the RU.
25. The District-Wide Landscape Assessment divides the district into landscape units and then analyses, assesses and evaluates their landscape character. As can be seen on Appendix D, the Shepherds Creek Valley (Landscape Unit 12) is a "Valleys and Open Plains" Landscape Unit

that is identified as not being an ONL or a “Landscape of District Wide Significance”. The unit is identified as having “limited” landscape sensitivity and “below average” landscape quality<sup>3</sup>.

26. Ultimately, the Rural Review informed Plan Changes that were incorporated into the ODP. As the relevant Planning Maps show, the Shepherds Creek Valley is identified as an area of ORL.
27. The Bannockburn Heritage Landscape Study was commissioned by DOC in 2004. The Study is focussed on heritage issues rather than landscape, however, it uses the concept of a “heritage landscape” in relation to the broader Bannockburn vicinity. This concept is based on the premise that heritage is best thought of as a “network” or “layered web”, rather than individual sites or features. The study gives very extensive detail of the history of the area and the evidence that remains in the landscape. Appendix E of this evidence comprises maps reproduced from that study. Essentially, the study emphasises the high value of the heritage associations with this landscape due to the distinctiveness and richness of history in this area and promotes the preservation of this value. Chapters 11 (including Plan Change 20) and 14 of the ODP deal with heritage issues.
28. The Cromwell Masterplan<sup>4</sup> examines how to accommodate growth in the Cromwell area for the next 30 years. The study area of the Masterplan includes Bannockburn. The Masterplan notes that Bannockburn:
- “is expected to experience some further growth as an ‘urban village’, bringing additional convenience retail/ tourism/hospitality activities, (appropriate to a “Village Centre” zone) on Bannockburn Rd/Domain Rd. This node recognises the ongoing viticulture investment, increased visitor and resident numbers, including seasonal employment and camping.”*
29. The Masterplan notes that a centrally located convenience retail outlet could bring a “heart” to the town and a “key move” is to:
- “Support growth of housing balanced with the current section sizes and retaining the character of the local streets”*

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<sup>3</sup> Central Otago District Rural Review Landscape Assessment Report and Recommendations, July 2008, Map 7 and pages 9 and 10.

<sup>4</sup> Cromwell ‘Eye to the Future’ Masterplan - Spatial Framework - Stage 1: Spatial Plan, adopted by CODC May 2019.



Summary regarding guidance documents

30. The guidance that I have taken from the various statutory and relevant non-statutory (but adopted by CODC) documents is summarised as follows:
- It is anticipated that urban environments will change over time and that these changes may detract from some amenity values while improving other amenity values. Change from a rural to urban form is also not, in itself, an adverse effect;
  - The landscapes of Central Otago are an important resource to the District in general. The most valued landscapes are the ONLs. The next-most valued are the SALs. Landscape and amenity values are still relevant within the ORLs and should be maintained, with emphasis being given to hills and ranges. The submission site sits relatively centrally within the ORL of the Shepherds Creek Valley, at the southern edge of Bannockburn township;
  - The Shepherds Creek Valley ORL is of limited landscape sensitivity but has high heritage values;
  - It is expected that residential growth will occur within Bannockburn over the next 30 years, which, unless it is all “in-fill” (which itself would have impacts on amenity and heritage values), will require some rezoning.

## THE EXISTING LANDSCAPE CONTEXT AND VALUES

The Shepherds Creek Valley

31. Some discussion is included above regarding the Shepherds Creek Valley and how it is described by the District Wide Landscape Study and by the ODP. Appendix C shows the extent of this valley landscape that sits between the Cairnmuir Mountains and the Carrick Range. Bannockburn township sits at the northern mouth of this valley, overlooking the Kawerau River. The District Wide Landscape Study rates the Shepherds Creek Valley as being of limited landscape sensitivity and makes the following comments:

*“In the valleys associated with the Lindis and Clutha to the north, and the valley south of Bannockburn, the pasture is divided into more obvious field patterns. The streams and rivers also meander through the flats, and there are more trees – pine, poplar, willows, Cupressus macrocarpa and hawthorn hedges.*

... There is more shape in the landform and more trees. There are more buildings and structures in the landscape and more of a variety of land uses.

*The land surrounding the Clutha and Lindis Rivers in the north, and the valley south of Bannockburn offer the opportunity for some additional development provided it is carefully sited and does not compromise the strong rural character of these areas*<sup>5</sup>.

32. I describe the attributes, character and values of this landscape in subsequent paragraphs. While referring to the Shepherds Creek Valley as a whole, I will give some emphasis to the most relevant area, being the northern part of the valley close to Bannockburn township. Methodology has been guided by the New Zealand Institute of Landscape Architects Landscape Assessment Guidelines (**the NZILA Guidelines**)<sup>6</sup>.

#### Physical Attributes<sup>7</sup>

33. With reference to Appendix C, Shepherds Creek Valley runs from Round Hill in the south, down to Lake Dunstan (formerly the Kawerau River) to the north. The southern part of the valley floor, between Round Hill and Adams Gully, takes the form of flatter improved pasture. From Adams Gully northward, the valley floor is a series of terraced spurs between the various creeks that drain from the Carrick Range to the west. These terraces support a patchwork of viticultural and horticultural plantings, interspersed with associated buildings, roads, etc. The northernmost area of terraces, north of Smiths Gully, accommodates Bannockburn township. Between the township and Lake Dunstan, the Felton Road area supports extensive vineyards and the Bannockburn Sluicings area.
34. In terms of vegetation, the valley is very much dominated by productive farming, viticulture and horticulture. There are minimal areas of remnant native vegetation.
35. The landform of the valley, particularly north of approximately Adams Gully, has been considerably modified by influenced by gold mining, resulting in vertical sluice faces, water races and areas of tailings. The resulting pattern of development is that buildings and occupation sit on the flatter terraced areas, leaving the sluiced gullies and faces unoccupied.

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<sup>5</sup> Central Otago District Rural Review Landscape Assessment Report and Recommendations, July 2008, Map 7 and pages 21 to 23.

<sup>6</sup> Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architecture, July 2022.

<sup>7</sup> The NZILA Guidelines define physical attributes as "both the natural and human-derived features, and the interaction of natural and human processes over time", at paragraph 4.23.

36. The township of Bannockburn itself has the character of a small rural settlement spread across a series of terraces, with dwellings of varying ages and architectural styles. However, it is a short distance from Cromwell and serves as a suburb.

Associative Attributes<sup>8</sup>

37. As has been discussed, the Bannockburn area and the Shepherds Creek Valley have strong historical associations with mining since the early 1860s. This has shaped the landform itself as well as the development/occupation patterns, as can be seen from the Appendix E.
38. As is detailed in the Bannockburn Heritage Landscape Study, the overlay of many remnants of the gold mining era means that an important part of an observer's appreciation of the Shepherds Creek Valley (particularly its northern half) is associated with history and heritage. It is a strong part of the area's appeal.
39. Another association that many people have with the relevant landscape is that of viticulture, vineyards and winemaking. This adds a layer of meaning and appeal to the landscape that is directly associated with soils and production.
40. Outdoor recreation is another significant association with this landscape at a broad scale. Some observers will associate the area with the network of pedestrian/cycle trails, including the Lake Dunstan Trail, the Long Gully Loop Track and the Slapjack Saddle Track. The nearby Nevis Valley and Bannockburn Inlet are also important recreational drawcards.

Perceptual Attributes<sup>9</sup>

41. In a broad sense, the Shepherds Creek Valley is perceived as a relatively verdant valley floor sitting between the arid and rugged slopes of the Carrick and Cairnmuir ranges. The valley floor to the south of Adams Gully reads as open, unirrigated, improved pasture; relatively distinct from the more unkempt mountain slopes. North of Adams Gully, the valley floor takes the form of terraces to the west of Bannockburn Road, that are in smaller landholdings, more occupied and accommodating viticulture and horticulture. The terraces are separated by gullies that often are recognisably altered by past sluicing. Again, this northern part of the valley contrasts with the

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<sup>8</sup> The NZILA Guidelines define associative attributes at paragraph 4.23 as "the intangible things that influence how places are perceived – such as history, identity, customs, laws, narratives, creation stories, and activities specifically associated with a landscape".

<sup>9</sup> The NZILA Guidelines define perceptual attributes at paragraph 24.3 as being "both sensory experience and interpretation. Sensory appreciation typically occurs simultaneously with interpretation, knowledge, and memory".

unoccupied and wilder mountain slopes; the northernmost part of the valley accommodating the township and the Felton Road viticultural area.

42. The valley reads as a very pleasant rural landscape in aesthetic terms. Rolling farmland, orderly rows of viticulture, rugged containing mountain slopes and the rustic character of the township all contribute to a coherent and memorable visual pattern. The exotic and productive patterns of the valley floor also mean that there is considerable seasonal change and associated aesthetic interest.
43. As previously noted, the frequent visual evidence of heritage features adds to the aesthetic interest, particularly since these human-imposed elements accord with and reinforce underlying natural landform.

#### Landscape Values<sup>10</sup>

44. The most valued landscapes of the district are the identified ONLs, with SALs being second-most valued. With reference to Appendix F, the highest parts of the Carrick and Old Woman Ranges to the west of Shepherds Creek Valley, and of the Cairnmuir Range to the east, are categorised as ONLs. The lower slopes and foothills of these ranges are categorised and SALs, with the Shepherds Creek Valley and Bannock Burn Valley sitting as an area of ORL.
45. Despite its categorisation as an ORL, the discussion above shows that some important landscape attributes of the Shepherds Creek Valley are certainly valued; particularly heritage, viticultural and recreational associations, as well as pleasant rural aesthetics.

#### The site and its immediate context

46. The site in its immediate context is shown on Appendix G. Under the notified PC19 situation, the site was not proposed to be changed from its current zoning of RU.
47. The Bannockburn residential area on the western side of Bannockburn Road takes the form of an east-west running strip accessed by Domain Road and Hall Road. The residential area is located on the northern half of the broad flat-topped spur that sits between Domain Road to the north and Smith's Gully (and Schoolhouse/Quartzville Road) to the south.

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<sup>10</sup> The NZILA Guidelines define landscape values at paragraph 5.6 and the glossary as "the reasons a landscape is valued – the aspects that are important or special or meaningful" and note that "values are embodied in certain attributes". Also, at paragraph 5.55, it is helpfully notes that "hybrid terms such as 'visual amenity', 'rural amenity' and natural amenity' are shorthand for 'landscape values that contribute to amenity values'".

48. Bannockburn township has the character of an informal rural town. Older developed sites generally feature smaller residential buildings of a cottage or batch type of character and scale, leaving ample open space. More recently developed sites (within perhaps the last 10 or 15 years) generally feature larger dwellings of a rural residential type of character. This somewhat eclectic mix is part of the town's current character. Another unusual and defining aspect of Bannockburn's character is the mix of productive land use (viticulture and horticulture) coming right into the residential area. This creates something of a patchwork effect with broken edges to the residential pattern, creating a visually pleasant, green connection between the residential occupation of the area and the productive use of land.
49. Schoolhouse Road runs west from Bannockburn Road and follows the southern side of Smith's Gully, being a substantial gully that marks the southern end of the flat-topped spur on which Bannockburn township is situated. Schoolhouse Road accesses the Bannockburn School site and the Quartzville area. With reference to the historic maps of Appendix E, the school, Quartzville and Carricktown are long-established sites of occupation accessed by this road.
50. With reference to Appendix G, the subject site itself takes the form of a rolling terrace that sits within Smith's Gully on the northern side of the gully's gut and watercourse that generally runs through the Parsons/Smith property (practically on the southern boundary of the site). The rolling terrace of the site is a distinct piece of landform, forming the northern part of Smith's Gully. The land cover of the site takes the form of stoney unkempt paddock land with areas where gravel extraction / earthworks have taken place in the past. The eastern part of the site includes a small dwelling with accessory buildings in a sloping area of deciduous tree cover.
51. A pedestrian and cycle track runs from Lynn Lane to Schoolhouse Road as can be seen on Appendix G. This enables a walking/cycling loop within immediate reach of Bannockburn that I understand is well used.
52. With reference to the previous discussion of the landscape attributes and values of Shepherds Creek Valley, the subject site sits at the northern part of this valley, on the southern edge of the residential area of Bannockburn. This is the part of the valley that has been significantly modified (in terms of landform) by past mining activities and that has accommodated the most occupation.

## THE EFFECTS OF THE REQUESTED RELIEF IN RELATION TO VISUAL AMENITY AND LANDSCAPE VALUES

53. The Klevstuls' relief is described in paragraphs 10 to 12 above. Essentially, it would result in a southern extension to the residential area of Bannockburn over the terrace land of the site that I understand is not suitable for productive use. It would enable the development of a more of a clustered or hamlet layout over the discrete rolling landform of the site that sits between Schoolhouse Road and the existing residential area, as shown on Appendix B.
54. As discussed, I have also prepared evidence in relation to the Davies submission site to the immediate north of the subject site. I do not see that the Klevstuls' relief necessarily hinges on the Davies site becoming residential, but I have found the relief of both of these submitters to be logical and appropriate in landscape terms.
55. When describing effects, I use the hierarchy of adjectives given in the bottom row of the table below to describe the degree of an identified effect. An identified effect may be positive or negative depending upon its nature and its relationship to existing landscape values. The upper two rows show how the adjectives that I use can be related to specific wording within the RMA<sup>11</sup>.

						SIGNIFICANT
LESS THAN MINOR		MINOR		MORE THAN MINOR		
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

## VISIBILITY OF DEVELOPMENT AND CONSEQUENTIAL EFFECTS ON VISUAL AMENITY

56. Visual effects are:

*“the consequences of change on landscape values as experienced in views. ... A proposal that is in keeping with the landscape values, for example, may have no adverse visual effects even if the proposal is a notable change to the view. Conversely, a proposal that is completely out of place with landscape values may have adverse effects even if only occupying a portion of the view.*

<sup>11</sup> Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022.

*They are a technique to help understand landscape effects. They are a subset of landscape effects<sup>12</sup>.*

57. Therefore, when considering visual effects, it is important to bear in mind the existing landscape values and the landscape attributes that lead to these values, as discussed in previous parts of this evidence.

### ***Visual catchment and viewing audiences***

58. The Klevstul site is located on the southern part of the terraced spur that sits between Domain Road and Smiths Gully. The proposed development area takes the form of a rolling terrace that forms the northern side of Smith's Gully in this location. Since this terrace sits practically within Smiths Gully, it is significantly hidden from broad views and from Bannockburn township. Areas from which development enabled by the Klevstuls' relief may be visible are:

- Immediately adjoining properties to the north, west and south of the submission site.
- The public trail to the west of the site.
- Schoolhouse Road.
- Quartzville Road, Gully Road and adjacent properties.
- Part of Bannockburn Road and properties to its east.
- Distant, elevated viewpoints to the east and west of Bannockburn.

### **Effects of the requested relief in relation to views and visual amenity**

59. When considering potential effects of views and visual amenity, it is relevant that no party lodged a further submission raising visual amenity concerns (or any other concerns) in relation to Submission 163.
60. It is also important to consider the form of development that would be enabled and hence would be seen from the various viewpoints set out above. With reference to Mr Lundy's evidence, the provisions sought by the submission will mean that a residential pattern develops over the site that involves significant greenspace with clusters of residential activity as well as open areas and

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<sup>12</sup> The NZILA Guidelines, paragraphs 6.7, 6.25 and 6.27.

visually soft vegetated treatments, to a much greater degree than would result with an application of the standard LLRZ provisions.

*Immediately adjoining properties to the north, west and south of the site*

61. With reference to Appendix G, to the north and west of the Klevtul site lies the Doctors Flat Vineyard Ltd property. Also to the north is the G and S Stewart property.
62. The Doctors Flat Vineyard property is the subject of Submission 147 by Stephen Davies (the owner of Doctors Flat Vineyard Ltd). I have prepared a brief of evidence in relation to Submission 147. While Mr Davies is no longer part of Submission 163 (which was originally a joint submission), he is supportive of the relief sought by Mr Klevstul in relation to Submission 163 and sees the relief that he seeks in relation to Submission 147 as being consistent with that of Submission 163.
63. The Stewart property takes the form of an east-facing incised gully area. Steep, previously-sluciced escarpments enclose it and considerable mature exotic tree cover adds to this enclosure. The property is used for yard-based commercial activities. The owners of the Stewart property have not lodged a further submission in relation to Submission 163. I understand that Mr Klevstul has met with and communicated with the Stewarts a number of times and that the Stewarts are supportive of the relief that Mr Klevstul seeks. This is logical when we consider the topography and use of the Stewart site; the submitter's relief will not adversely affect amenity as experienced from the Stewart site.
64. To the immediate south of the subject site is the Parsons/Smith property, on the north side of Schoolhouse Road. The owners of this property have submitted seeking LLRZ (Submission 100) and have not lodged any further submissions. Again, communication between Mr Klevstul and these owners has been ongoing and I understand that Parsons/Smith are supportive of the Submission 163 relief.

*The public trail to the west of the site*

65. With reference to Appendix G, a public pedestrian/cycle trail links Lynne Lane in the north to Schoolhouse Road in the south. Users of this trail are occupants of Bannockburn township or visitors. The trail is part of a loop and a trail user feels that they are circumnavigating the outside of the township.



66. Descending from Lynne Lane, views from this trail are largely enclosed by topography and vegetation. Once in the gut of Smith's Gully, views are available the gully to the east, taking in the land of the Doctors Point land, including its existing dwelling, and the upper part of the subject site. To the west, rising topography truncates views. Continuing towards Schoolhouse Road, the old school site (now the Bannockburn Camp) is apparent with its buildings, outdoor spaces and structures and mature trees. A trail user gains a rural outlook to the west and south and long views are available to the distant mountain skylines. The experience is of being on the periphery of the township.
67. With reference to Photograph KA of Appendix I, development enabled by the Submitter's relief would appear as a pattern of clustered residential development and open greenspace over the subject site, the western part of which can be seen in these views. A trail user will recognise that Bannockburn township extends further south than currently and that the sloping land of the site, being at a lower elevation than the main part of Bannockburn and on a somewhat distinct terrace landform, accommodates a particular pattern of development but recognisably part of the township.
68. A trail user is fully aware that they are on the periphery of Bannockburn township. Experiencing an area of extended residential activity of the density proposed will reinforce this feeling of circumnavigating the town, albeit that open space exists between the viewer and the site. Openness and long views will continue to dominate the experience but the presence of development as sought, in conjunction with the camp and Schoolhouse Road will emphasise the role of Schoolhouse Road as a southern edge to the township.
69. The presence of township development closer to the trail than currently will somewhat reduce the currently more rural outlook and feeling of remoteness (albeit that a trail user is fully aware of the township). Considering the existing values of the Shepherds Creek Valley landscape (which include pleasant rural character stemming from rural land uses and openness), for some trail users, this may reduce amenity, but an effect of this sort will be of a low degree at most.

#### Schoolhouse Road

70. Schoolhouse Road sits within Smiths Gully as it extends west from Bannockburn Road, climbing gently to Quartzville Road which then continues towards Carricktown. Schoolhouse Road accesses the Bannockburn Camp and, with reference to the historic maps of Appendix E, is a long-established route to the school, Quartzville and Carricktown. In this sense, it has traditionally been something of a southern edge to the more intensive occupation of the valley.

71. The lower, eastern part of Schoolhouse Road immediately adjoins the eastern part of the subject site. As one proceeds up Schoolhouse Road, the Parsons/Smith site intervenes and includes considerable mature trees, in the gut of Smiths Gully (as can be seen in Photographs KB and KC of Appendix I). As a road user proceeds past the Bannockburn Camp, they ascend and leave the experience of enclosure within Smith's Gully. The upper part of Schoolhouse Road then climbs to Quartzville Road and allows more broad, open views.
72. On the lower eastern part of Schoolhouse Road, development enabled by the Submitter's relief will be plainly perceivable and will read as apart of Bannockburn township, albeit with a particular visual character defined by clustered built form and ample open space / greenspace. Residential buildings are most likely to sit on the more elevated, flatter part of the site such that the site's frontage with Schoolhouse Road itself is likely to take the form of vegetated or open space. With reference to Photographs KB and KC of Appendix I, a traveller on Schoolhouse Road will be fully aware that they are beside part of Bannockburn's residential township, but a visually soft frontage will be presented to the road itself.
73. A user of Schoolhouse Road will be a local resident and/or will have just travelled through the existing Bannockburn township. More commentary of the visual amenity that is experienced by an observer of this sort is given below under the heading of Bannockburn Road.

Quartzville Road, Gully Road and adjacent properties

74. From most of Quartzville Road, Gully Road and the upper part of Schoolhouse Road, topography means that the subject site is hidden within Smiths Gully. However, there is some visibility to the relevant area from immediate vicinity of the intersection of these three roads. These views are illustrated by photograph KD of Appendix I. They can also be gained from the property of 65 Gully Road and similar (but closer) views are available from the property at 15 Schoolhouse Road. The site is at a lower elevation to the viewer. Current views include Bannockburn township as a broken but recognisable horizontal strip of development to the north of the viewer, with surrounding mountains beyond. The proposed relief will bring brief visibility of residential development slightly closer to the viewer but lower, with the steep escarpments to the immediate north of the subject site acting as a step-down. The mature trees (largely willows) in the gut of Smiths Gully will filter views to the site and, as discussed, the site will include significant greenspace. While some township development will be seen closer to these viewers, the

composition of views will not be fundamentally altered. Visual amenity will be adversely affected to a low degree at most.

75. From some elevated properties adjacent to Quartzville Road (numbers 18, 20, 34 and 70 Quartzville Road), very broad views appear to be available in a northerly direction. With reference to Photograph KD of Appendix I, the surrounding mountains are prominent and Bannockburn township can be seen from something of a bird's-eye perspective. In these views, the larger-scale situation can be appreciated; as described in paragraph 46, Bannockburn township can be seen to sit on the northern half of the broad flat-topped spur that sits between Domain Road to the north and Smith's Gully to the south. With reference to Appendix A, the southern edge of the township (and the operative and notified zoning) is somewhat fragmented and meanders west-east along the spur, very roughly midway between Domain Road and Smiths Gully. The edge currently follows cadastral boundaries and lacks any visually legible alignment with landform.
76. From these more elevated properties adjacent to Quartzville Road, development enabled by the submitter's relief would be seen on the southern side of the existing Bannockburn township area, on the somewhat discrete rolling terrace of the site itself. The development pattern over the subject site under the proposed additional provisions would involve considerable greenspace, as has been described.
77. As mentioned, I have also prepared evidence relating to the Davies site to the immediate north of the subject site (i.e. between the subject site and the operative/notified zoning of Bannockburn) and I support the inclusion of the Davies site in the LLRZ. The Davies relief would mean that LLRZ and associated development (subject to the BLR areas within the Davies site) would extend south to adjoin the subject site; and the Klevstul relief would then extend this through to the gut of Smiths Gully. With or without the Davies relief, the development enabled by the Klevstul relief would be seen in these views as being effectively part of Bannockburn township. The Klevstul relief would enable a closer part of Bannockburn township, on the site's rolling terrace, stepped down in elevation from the existing zoned area, with Smiths Gully itself (and Schoolhouse Road) becoming the edge of the township.
78. Again, I consider that the situation described above will appear visually logical, appropriate and will not fundamentally alter the composition of views. The mid-ground of views will continue to be defined by the township occupying the terraced spur that sits between Smiths Gully and Domain Road. The southernmost (and closest) part of the township will feature a considerable

proportion of greenspace such that it does not read as being visually hard or overly built. The pattern of this mid-ground will be recognisably responsive to topography in that the steeper escarpment faces will be open and legible. The broader scene in which this mid-ground sits will very much be dominant and will continue to be defined by the rugged, containing, mountain ranges and very long views to the north. In views such as this, I consider that the Klevstul relief will emphasise the visual presence of the township as a mid-ground element, which will accentuate the presence of human modification/occupation in the overall visual composition. Again, given the current landscape values of the Shepherd's Creek Valley landscape, the increased presence of this occupation will amount to a detraction from current visual amenity values in these particular views. However, the additional area of township development will take place in a logical location with recognisable boundaries. The finished picture will appear in keeping with landform and logical, expected patterns of settlement. I consider that the exacerbation of built township development in these views will amount to an adverse effect on visual amenity of a low degree.

*Part of Bannockburn Road and properties to its east*

79. A section of Bannockburn Road as it passes the subject site allows views into the area of LLRZ sought by the Submitter. This also applies to the easternmost part of Schoolhouse Road. With reference to Appendix G, the stretch of Bannockburn Road from which the site is visible is approximately 190m long. The road is relatively contained by cut batters and topography, but when in the immediate vicinity of the Bannockburn Road / Schoolhouse Road intersection, views up into the site are clear, as illustrated by Photographs KE and KF of Appendix I, particularly if we consider the potential removal of the roadside clump of deciduous trees within the site.
80. In relation to the existing situation, a user of this part of Bannockburn Road will have just left the 50kmph township area of Bannockburn, passing the houses of Ritchie Lane on the left, the entrance to the Stewart Yard site on the right, then the Pemberton residential property on the left before encountering the Schoolhouse Road intersection (which is well-formed and signposted). Land of a more pastoral character begins beyond Schoolhouse Road. The visual experience of being on this stretch of Bannockburn Road is therefore one of being on the periphery of the current township.
81. With reference to Appendix E, Schoolhouse Road has, in the past, been an important route, accessing the school, Quartzville and Carricktown.

82. The requested relief will enable a clustered or hamlet residential pattern over the subject site as has been discussed. The easternmost part of the site slopes towards Bannockburn and Schoolhouse Roads and therefore is the most visible. With reference to Mr Lunday's Figure 15, this is envisaged as accommodating one dwelling with considerable planted greenspace and clustered buildings closer to the road frontage. Future subdivision and development of the site will be subject to resource consent processes of at least a restricted discretionary status, with matters relating to character, landscaping and the maintenance and enhancement of amenity values being considered through those resource consent processes.
83. In effect, the requested relief would mean that a user of this area of Bannockburn Road and the easternmost part of Schoolhouse Road experiences the pattern of township development extending as far south as the Schoolhouse Road intersection. This intersection also marks the gut of Smiths Gully; the township pattern would sit in the northern side of the gully.
84. Users of the relevant parts of Bannockburn and Schoolhouse Roads will be local residents or visitors that have just travelled through Bannockburn township. Under the requested relief, such an observer will experience the township extending to Smiths Gully, albeit that a specific character (including areas of more closely spaced dwellings and considerable greenspace) will emerge over the site itself. There will be visual logic in that the gut of the gully that marks the southern edge of the spur on which current Bannockburn sits, will become the southern edge of the township, and a specific treatment will be applied to that edge. As mentioned in paragraph 47, a somewhat patchwork pattern relates to the current township, with open space sites and productive sites encroaching well into the residential area. This will continue to be the case if the requested relief proceeds, with the Stewart Yard property sitting adjacent to Bannockburn Road to the north. The subject site will be connected to the existing township by the public trail adjacent to The Camp site (and via the Davies site if the Submission 147 relief proceeds).
85. For these users of Bannockburn and Schoolhouse Roads, I consider that the pattern of development resulting from the requested relief, while physically expanding the township, will appear visually appropriate and coherent. The extent of the township will relate to landform and roading patterns and will have a defined edge. The details of the proposed relief as well as the Objective, Policies and matters of discretion that will relate to future development within the site will bring about a careful treatment, and in any event, this will only be experienced from short stretches of these roads. Existing visual amenity in this RU part of Shepherds Creek Valley comes from rural land uses and openness. I consider that any reduction in the visual amenity

that is currently experienced will be of a low degree at most, and that some observers (perhaps many) are likely to find the visual experience of a clustered /hamlet development pattern at this southern edge of Bannockburn to be positive in terms of amenity.

*Distant elevated viewpoints*

86. Elevated viewpoints on the mountain slopes surrounding the Shepherds Creek Valley allow expansive views that include all of Bannockburn township. These viewpoints include public locations in the vicinity of Carricktown (illustrated by Photograph KG of Appendix I), Slapjack Saddle and Long Gully, as well as countless private locations on the slopes of the Carrick and Cairnmuir ranges.
87. In these views, the Shepherds Creek Valley is legible as a whole and all of Bannockburn can be seen at its northern end. Additional development enabled by the submitter's relief would be very difficult to discern; a small extension to the existing broad residential area. No material effect on visual amenity would result.

*Summary regarding effects on views and visual amenity*

88. The subject sits within Smiths Gully and therefore topography limits the visual catchment from which the site can be seen. Immediately adjoining properties were partners in the original submission (but have since withdrawn from that submission, pursuing their own (Davies), or just not wishing to maintain direct involvement) and are supportive of the relief that is sought.
89. From roads and trails in the immediate vicinity of the subject site and some nearby private properties, the requested relief will mean that the site plainly reads as part of Bannockburn township. However, the nature and extent of enabled development will have visual logic and coherence, and will accord with landform and with the current character of Bannockburn township.
90. For some observers in these areas, the current open and rural (but unkempt) character of the site, contributes to a degree of remoteness and corresponding visual amenity. The requested relief will reduce this visual amenity for these observers in some views, but to a degree that ranges up to being a low degree at most.

## EFFECTS ON LANDSCAPE CHARACTER AND VALUES

*“A landscape effect is an outcome for a landscape value.*

*While effects are consequences of changes to the physical environment, they are the outcomes for a landscape’s values that are derived from each of its physical, associative, and perceptual dimensions.*

*Change itself is not an effect: landscapes change constantly. It is the implications of change for a landscape’s values that is the effect. To assess effects it is therefore necessary to first identify the landscape’s values—and the physical characteristics that embody those values.*

*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.*

*Landscape values are the various reasons a landscape is valued—the aspects that are important or special or meaningful.”<sup>13</sup>*

91. Landscape attributes, character and values are discussed in a previous section of this evidence.

In summary:

- the Shepherd’s Creek Valley is dominated by productive farming, viticulture and horticulture. The landform of the valley, particularly its northern half, has been considerably modified by past mining practices.
- At the northern end of Shepherds Creek Valley, Bannockburn takes the form of an east-west running strip of residential development. The residential area on the western side of Bannockburn Road sits on the northern half of the broad flat-topped spur that sits between Domain Road to the north and Smith’s Gully to the south.
- The valley is an ORL landscape with limited landscape sensitivity. Despite this ORL status, it has pleasant rural aesthetics and important heritage, recreational and viticultural/productive associations.

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<sup>13</sup> Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines’. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022, paragraphs 5.06 and 6.01 to 6.04.

92. In relation to the relevant area, the operative zoning can be seen on Appendix A. In the relevant part of Bannockburn, the notified LLRZ covers the same area as the operative zoning, following the northern cadastral boundary of the Stewart property.
93. The requested relief would extend LLRZ (subject to the site-specific provisions that have been discussed) to the south so as to take in the subject site, with the southern boundary of the site following the gut of Smiths Gully. The yard-based activities of the Stewart site would continue to characterise that site, which is somewhat topographically distinct, being a separate small sluiced gully area. A pattern of township development characterised by groupings of smaller residential lots (down to a minimum of 400m<sup>2</sup>) with areas of common open greenspace would emerge over the site itself, somewhat reminiscent of historic settlement of Bannockburn.
94. The requested area of zoning would mean that the current zone boundary is replaced with a new zone boundary that provides for a southern expansion of residential land use to the gut of Smiths Gully. Residential activity will be enabled on land that provides relatively flat residential building locations with excellent solar access and amenity. As is discussed in my brief of evidence relating to Submission 147, this enabled development will also connect to further appropriate development to the immediate north of the subject site, and to the current township.
95. The change described will take place on the southern edge of the existing residential area of Bannockburn, at the northern end of the Shepherds Creek Valley, being a pleasant rural landscape but one that is a third-tier landscape in terms of the values placed on it at a District level.
96. The way in which the change to the landscape will be perceived visually is set out in detail in the previous section of this evidence. The submitter's relief will not give rise to a result that is visually prominent or appears out-of-place. It will tie in with existing patterns in a logical way with boundaries that relate to existing landform, development and roading patterns.
97. Due to all of the above factors, the ultimate result of the submitter's relief will not be out-of-character at an immediate scale nor at a broader scale. It will enable development that ties in well with Bannockburn township and that maintains the current landscape character and values of the Shepherds Creek Valley.



## CONCLUSIONS

98. My key conclusions are:

- The Shepherds Creek Valley landscape is not an ONL not and SAL. Despite this, the landscape has some important attributes and values, particularly heritage, viticultural and recreational associations, as well as pleasant rural aesthetics. The 2008 District-Wide Landscape Assessment identifies this as a landscape of limited sensitivity.
- Bannockburn township sits at the northern mouth of the Shepherds Creek Valley. The Submitter's relief would extend the notified LLRZ of Bannockburn township over the submission site, although specific proposed provisions would bring about a particular clustered or hamlet pattern of development over the subject site.
- The site sits on the northern flanks of Smiths Gully and therefore visual catchment from which the site can be seen is relatively limited. Some observers will potentially have visual amenity adversely affected, but only to a low degree at most.
- The southern boundary of the notified LLRZ that contains Bannockburn township follows a cadastral boundary to the north of the subject site. The requested area of zoning would mean that this boundary is replaced with a new zone boundary that follows the gut of Smiths Gully. The pattern of development that is enabled will be logical and will not be out-of-character at an immediate scale nor a broader scale.

99. Key District-wide issues in relation to landscape that are set out in the ODP are:

*The Central Otago landscape is nationally (and internationally) renowned for its scenic quality.*

*Outstanding Natural Features and Outstanding Natural Landscapes are those subject to section 6(b) of the Resource Management Act 1991. Significant Amenity Landscapes are subject to section 7(c), albeit that Other Rural Landscapes in the District also have amenity values including those associated with the results of human endeavour as discussed above.*

100. Following the conclusions of my assessment as summarised above, I consider that the zoning of the requested relief sits comfortably in relation to these issues. The character and values of the Shepherds Creek Valley landscape will be maintained.

**Benjamin Espie - 16 May 2023**

## Attached Appendices

- A. Plan – the notified situation in the vicinity of the subject site.
- B. Plan – the requested relief in the vicinity of the subject site.
- C. Plan – large scale context.
- D. Excerpts from the District Wide Landscape Study.
- E. Excerpts from the Bannockburn Heritage Study.
- F. Plan – large scale operative planning map.
- G. Plan – immediate context – viewpoints, neighbours, etc.
- H.
- I. Photographs:

KA: Pedestrian/cycle trail.

KB: Schoolhouse Road.

KC: Junction of Schoolhouse Road and pedestrian/cycle trail.

KD: Gully Road.

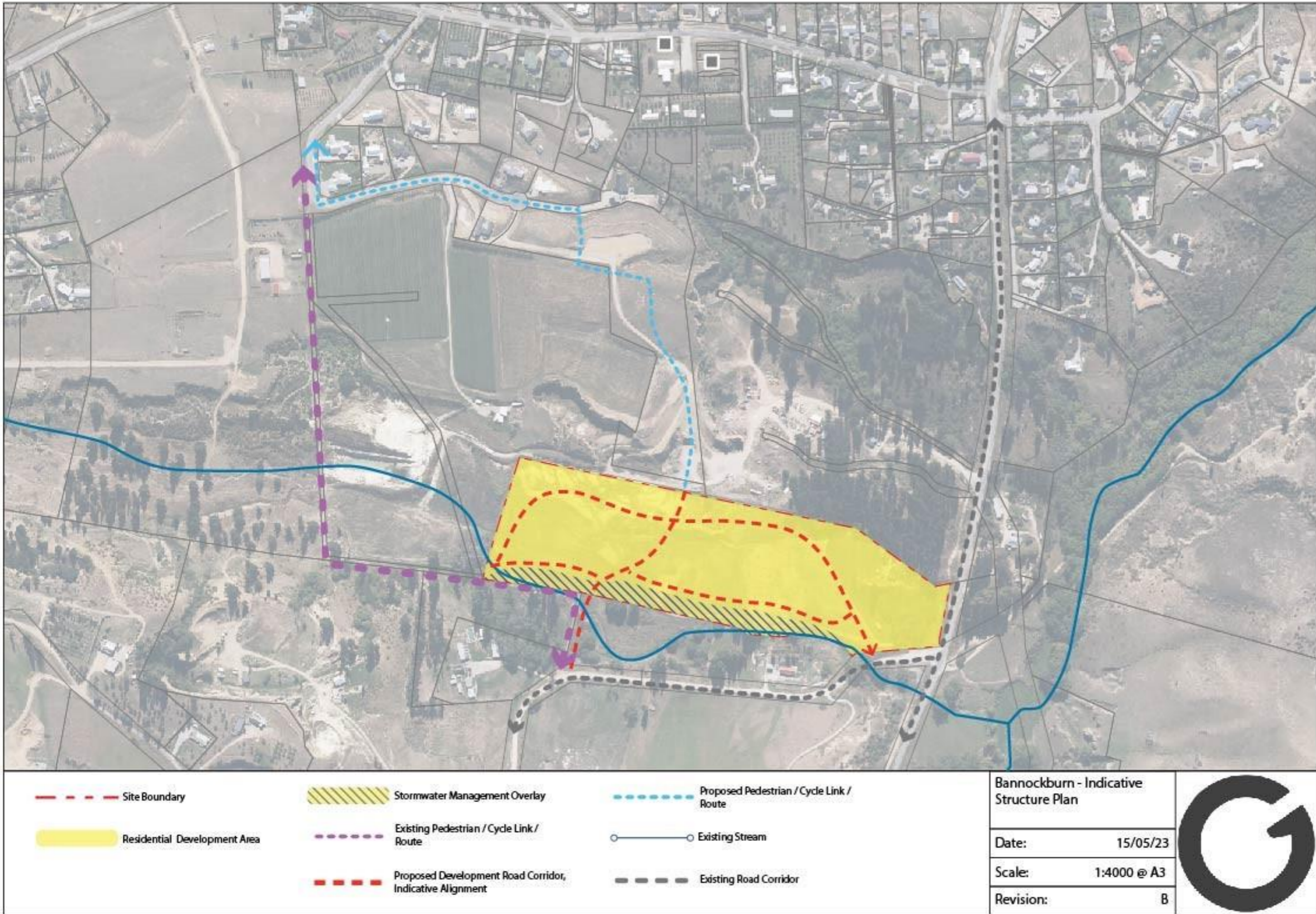
KE: Schoolhouse Road.

KF: Bannockburn Road.

KG: Carricktown Track.

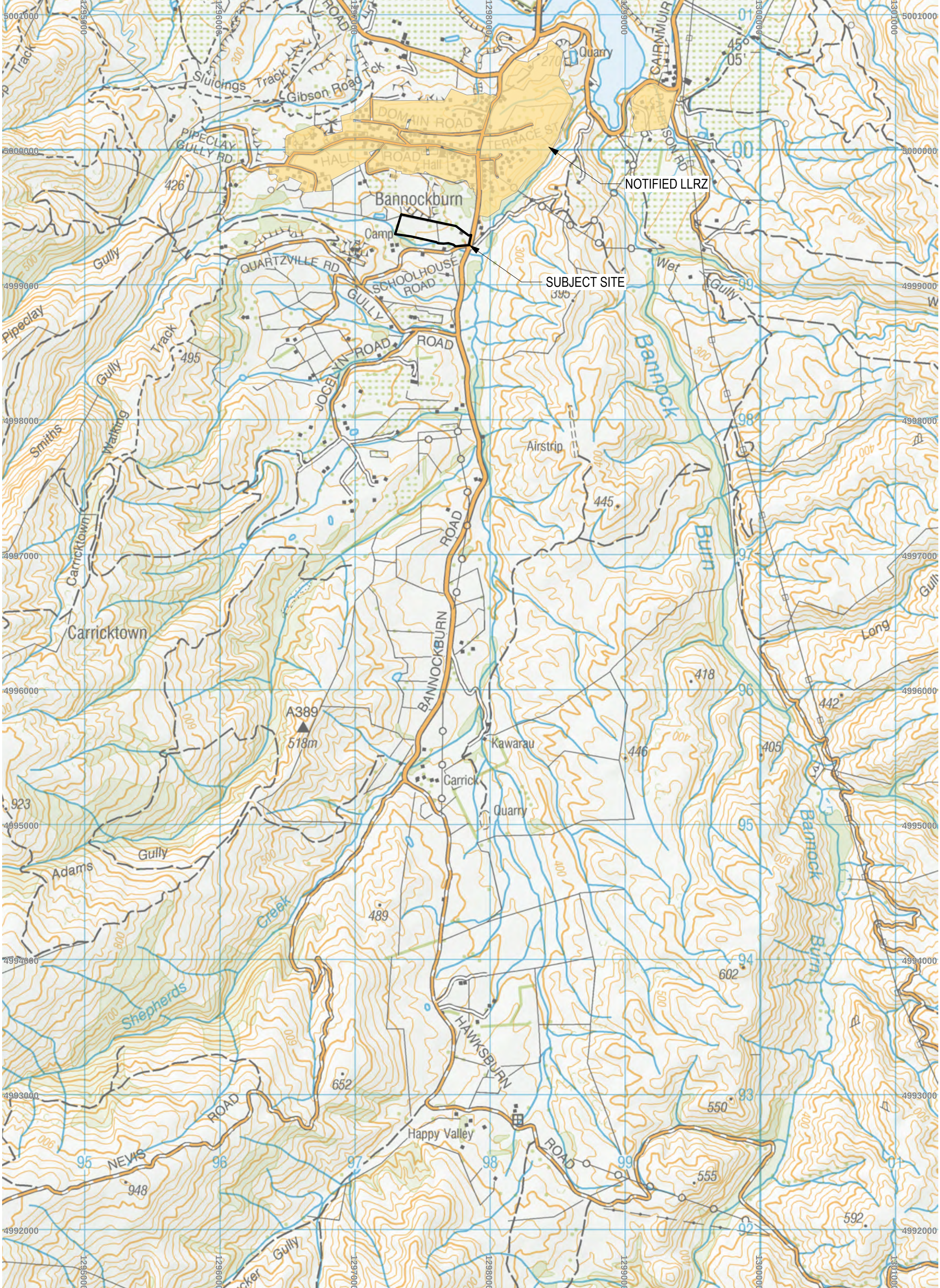


**PC19 SUBMISSION 163 - LANDSCAPE EVIDENCE - ESPIE - APPENDIX A:**  
PC19 NOTIFIED ZONING IN THE VICINITY OF THE SUBJECT SITE










**PC19 SUBMISSION 163 - LANDSCAPE EVIDENCE - ESPIE - APPENDIX B: INDICATIVE STRUCTURE PLAN**

The requested relief involves zoning the site, shown in yellow, as Large Lot Residential Zone with additional specific provisions to apply to it. This indicative structure plan could potentially also be included in the District Plan if that is considered to be helpful in further defining spatial layout.



Grid squares: 1 x 1 km Map series: Topo50 NZTM  
NZTopo sourced from LINZ - Crown Copyright Reserved

Project  
**Central Otago District  
Landscape Assessment**

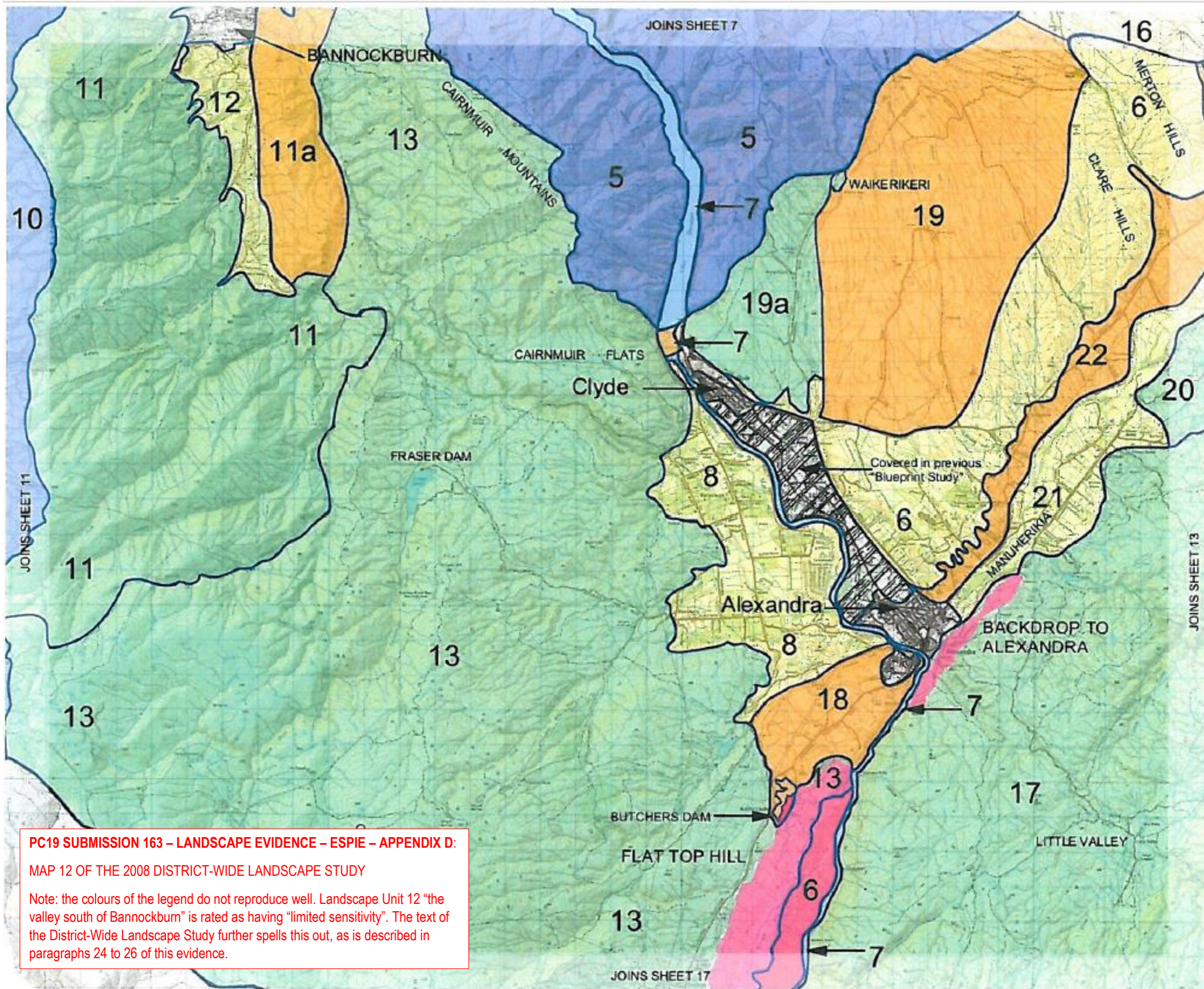
KEY	Rating
	Extreme sensitivity
	High sensitivity
	Significant sensitivity
	Moderate sensitivity
	Limited sensitivity
	Low sensitivity
	Significant landscape feature
<b>10</b>	Landscape unit number

Information:  
Scale: 1: 100,000 @A3  
Date: 29.08.08  
Issue: L

Location:

	1	2			
	3	4	5		
6	7	8	9	10	
11	12	13	14	15	
16	17	18	19		
	20	21			

Map 2: Landscape Units  
**2.12**



**PC19 SUBMISSION 163 – LANDSCAPE EVIDENCE – ESPIE – APPENDIX D:**

**MAP 12 OF THE 2008 DISTRICT-WIDE LANDSCAPE STUDY**

Note: the colours of the legend do not reproduce well. Landscape Unit 12 “the valley south of Bannockburn” is rated as having “limited sensitivity”. The text of the District-Wide Landscape Study further spells this out, as is described in paragraphs 24 to 26 of this evidence.

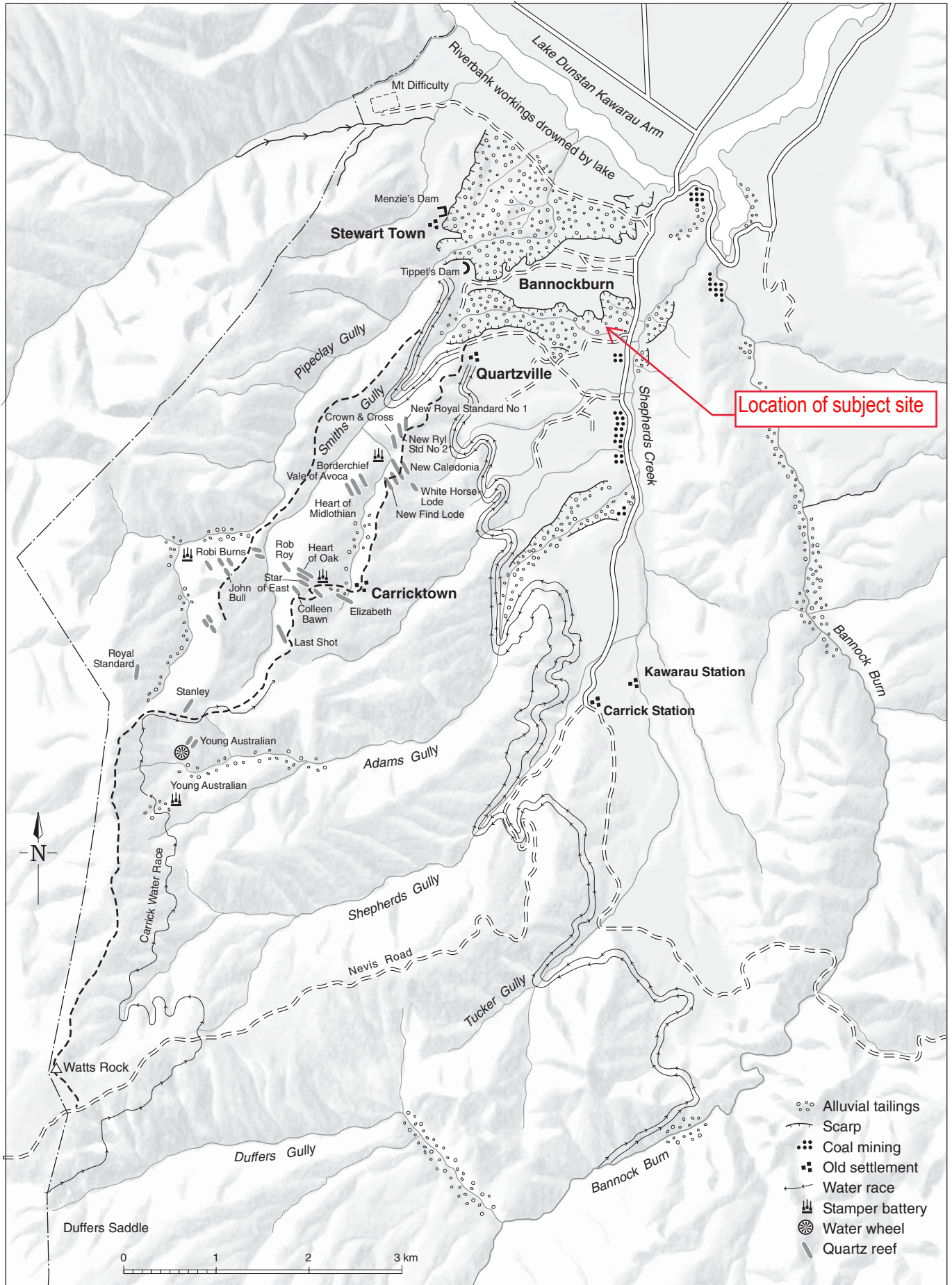


Figure 2. General location of some of the known archaeological features in the Bannockburn area.

**PC19 SUBMISSION 163 - LANDSCAPE EVIDENCE - ESPIE - APPENDIX E(i):  
EXCERPT FROM THE BANNOCKBURN HERITAGE LANDSCAPE STUDY**

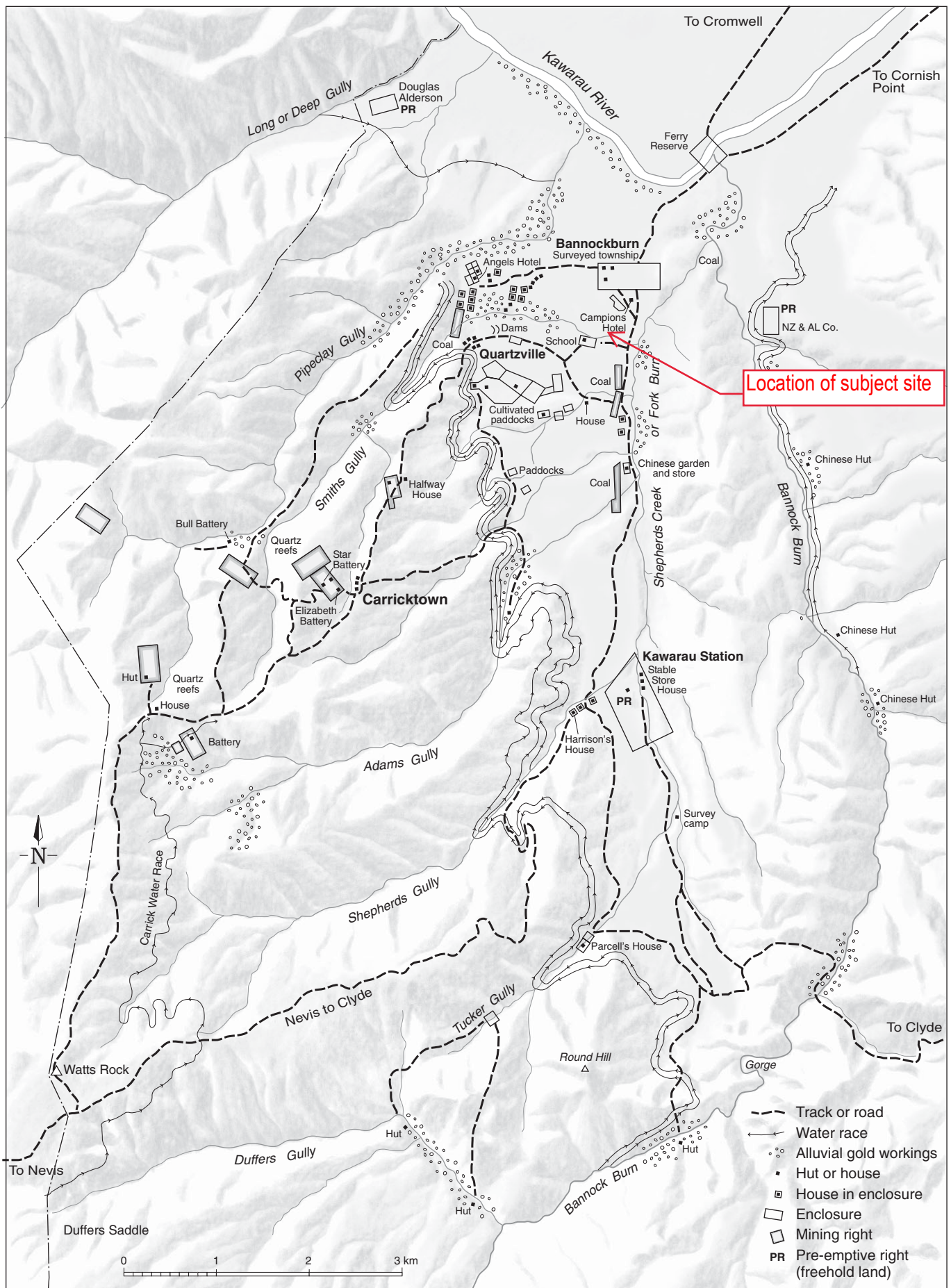
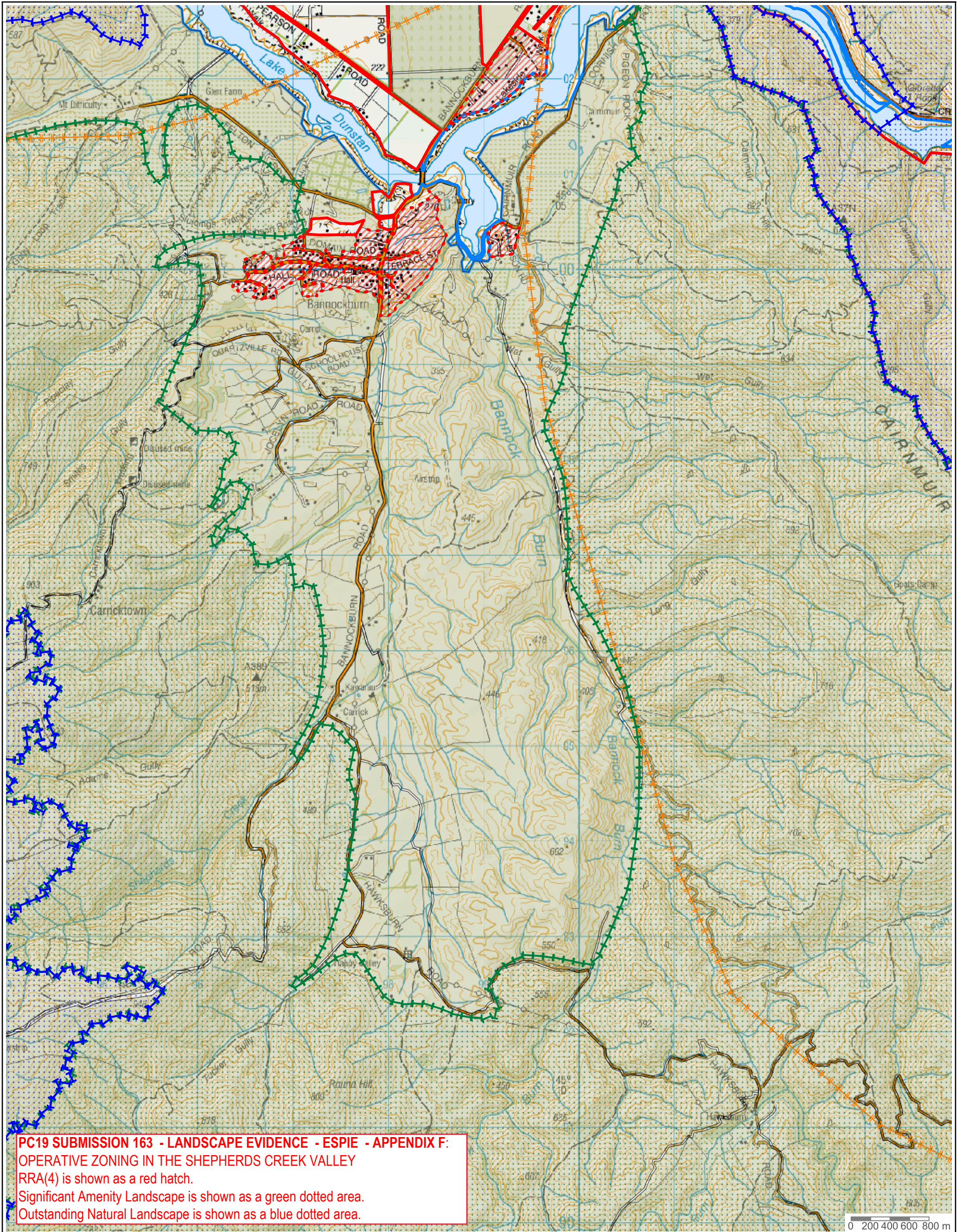
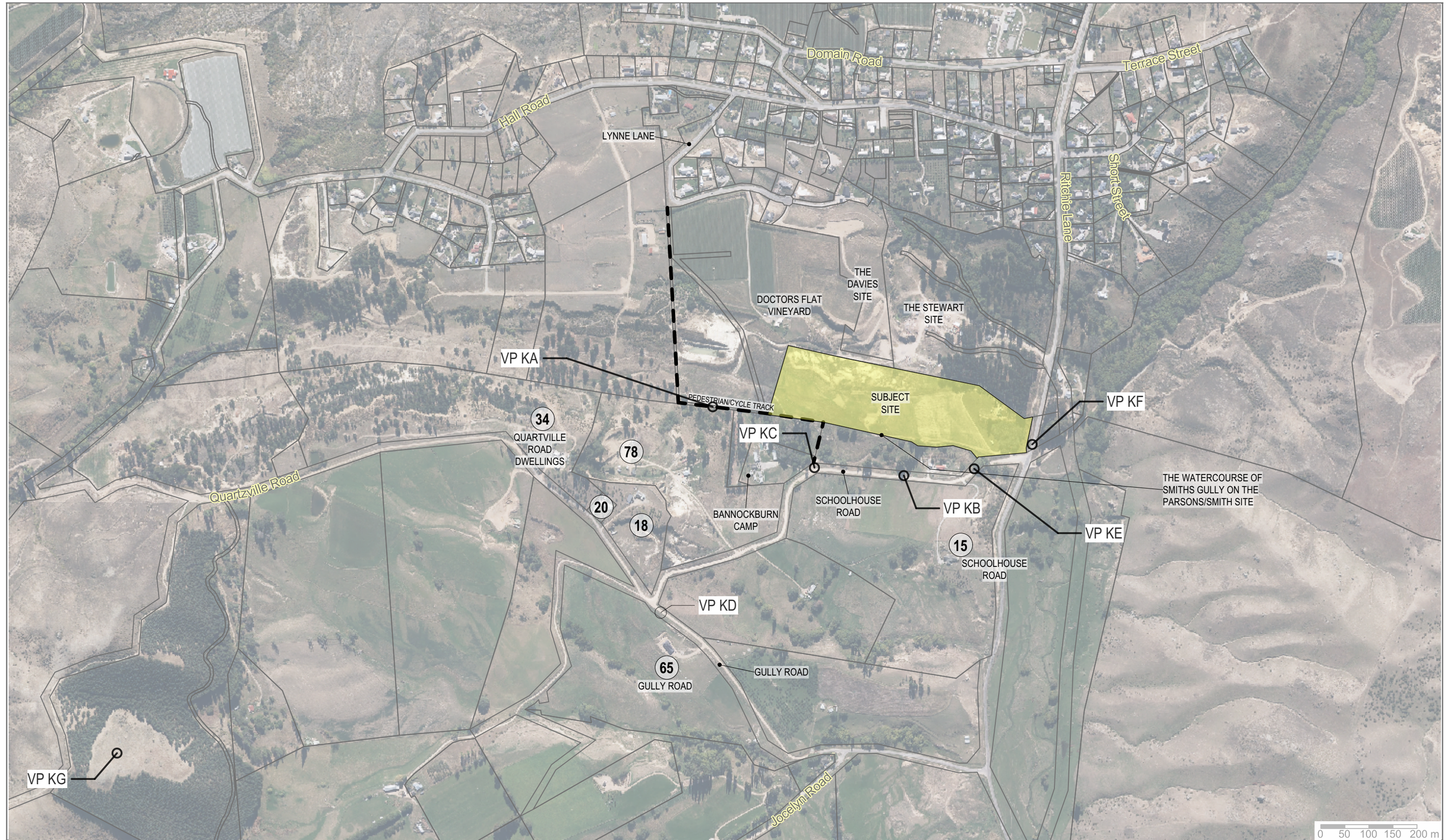


Figure 17. Map of Bannockburn in 1878.

**PC19 SUBMISSION 163 - LANDSCAPE EVIDENCE - ESPIE - APPENDIX E(ii):  
EXCERPT FROM THE BANNOCKBURN HERITAGE LANDSCAPE STUDY**







Extent of subject site (beyond juvenile trees)



Photograph KA: From the public pedestrian/cycle track that connects Lynne Lane to Schoolhouse Road.

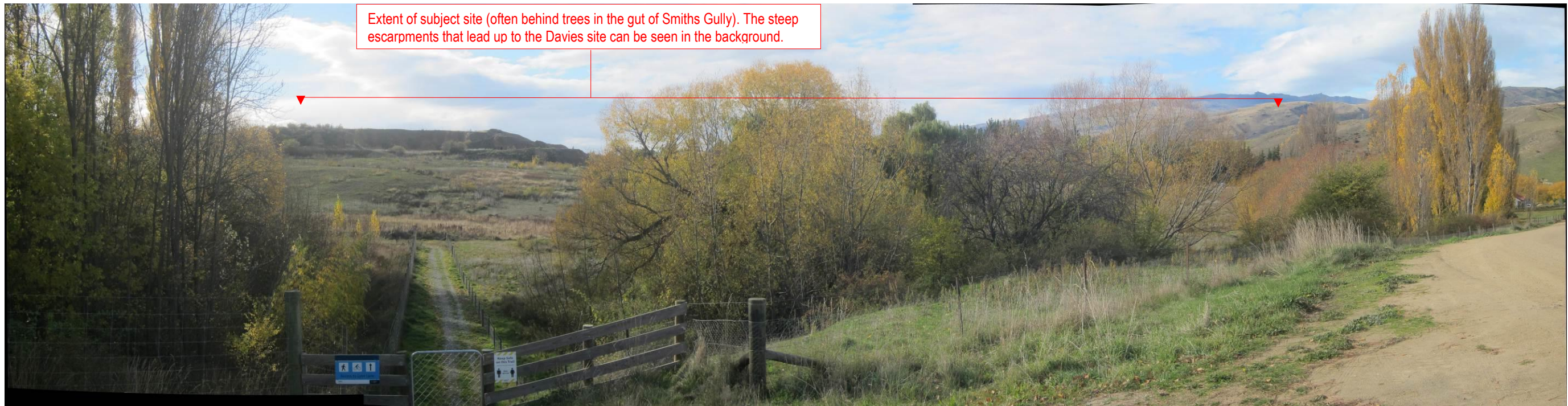
Extent of subject site (largely behind trees in the gut of Smiths Gully)



Photograph KB: From lower Schoolhouse Road.

**PC19 SUBMISSION 163 – LANDSCAPE EVIDENCE – ESPIE – APPENDIX H: PHOTOGRAPHS**

All photographs were taken on the 4<sup>th</sup> of May 2023 with a fixed focal length of 50mm.



Extent of subject site (often behind trees in the gut of Smiths Gully). The steep escarpments that lead up to the Davies site can be seen in the background.

Photograph KC: From the junction of the public pedestrian/cycle track and Schoolhouse Road.



Part of the subject site is visible, as is part of the yard activities on the Stewart site.

Photograph KD: From Gully Road adjacent to number 65.

**PC19 SUBMISSION 163 – LANDSCAPE EVIDENCE – ESPIE – APPENDIX H: PHOTOGRAPHS**

All photographs were taken on the 4<sup>th</sup> of May 2023 with a fixed focal length of 50mm.

Approximately the eastern half of the subject site is in view with the escarpments of the Davies site behind.



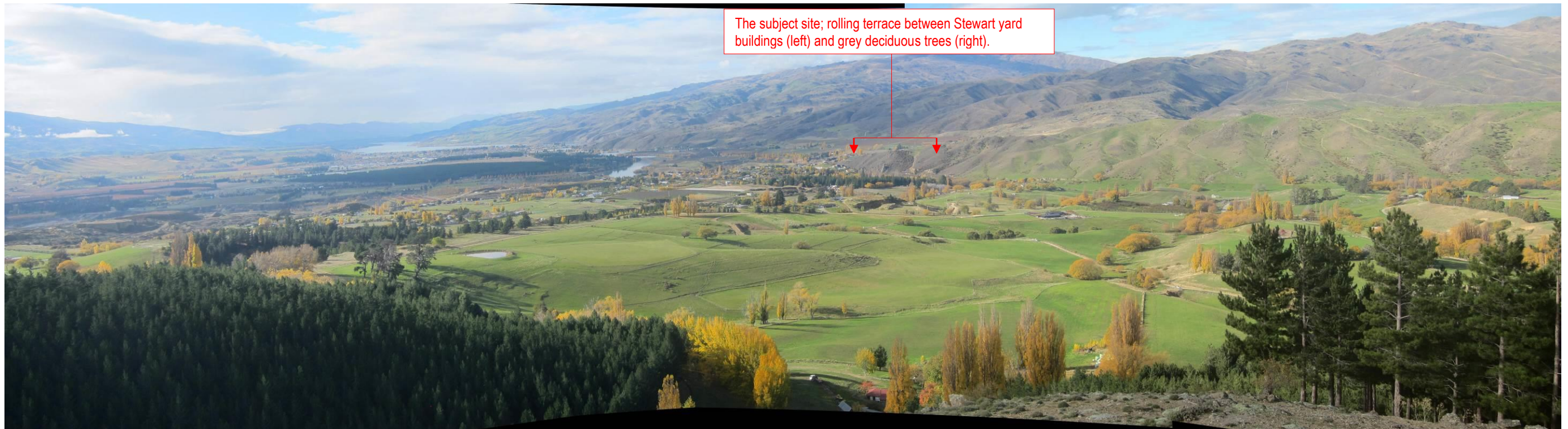
Photograph KE: From the lowest part of Schoolhouse Road.



Photograph KF: From the site's road frontage with Bannockburn and Schoolhouse Roads. The site's existing dwelling sits behind the deciduous trees.

**PC19 SUBMISSION 163 – LANDSCAPE EVIDENCE – ESPIE – APPENDIX H: PHOTOGRAPHS**

All photographs were taken on the 4<sup>th</sup> of May 2023 with a fixed focal length of 50mm.



Photograph KG: Representative view of those that can be gained from Carricktown Track and similar locations.