

SUBMISSION FORM

Under the Resource Management Act 1991



SUBMITTERS DETAILS

Submitters Full Name/Company/Trust: Tekapo Landco Limited & Godwit Leisure Limited	
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* Our default method of corresponding with you is by email and phone. Alternatively, if you wish to receive correspondence by post (including any decision) please provide a postal address and tick the relevant box above.

ADDRESS FOR SERVICE (if different from the submitter's details)

Company:	
Contact Name:	
Email address*:	
Postal Address*:	Tick if postal address is preferred method of correspondence*: <input type="checkbox"/>
Phone numbers: Day	Mobile

* Our default method of corresponding with you is by email and phone. Alternatively, if you wish to receive correspondence by post (including any decision) please provide a postal address and tick the relevant box above.

DETAILS OF APPLICATION BEING SUBMITTED ON

APPLICANT'S NAME: Queenstown Commercial Parapenters Limited
RM REFERENCE: RM230149
DESCRIPTION OF PROPOSED ACTIVITY: Proposal to establish and operate a commercial tree-climb ropes course and picnic facilities alongside Lakeside Drive in the Takapō, Lake Tekapo township.

MY SUBMISSION

Please indicate whether you support, oppose or are neutral to the application or specific parts of it (Tick):

SUPPORT ☐ OPPOSE ☐ NEUTRAL ☐

My submission is (the particular parts of the application I support or are opposed to are):

Refer attached document.

(Attach separate sheet as required)

The reasons for my submission (the reasons I support or oppose the particular parts of the application above):

Refer attached document.

(Attach separate sheet as required)

My submission would be met by the Council making the following decision (give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought):

Request that the Council decline the application.

(Attach separate sheet as required)

DECLARATIONS

Please indicate whether or not you are a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (tick):

☐ I **am** a trade competitor ☐ I **am not** a trade competitor

If you are a trade competitor, please indicate whether or not are directly affected by an effect of the subject matter of the submission that

- (a) Adversely affects the environment; and
(b) Does not relate to trade competition or the effects of trade competition (tick):

☐ I **am directly affected** ☐ I **am not** directly affected

Please indicate whether or not you wish to be heard at the hearing in support of your submission (note you will only be notified of a hearing if you have indicated you wish to be heard) (tick):

☐ I **wish** to be heard ☐ I **do not** wish to be heard

If others make a similar submission, I will consider presenting a joint case with them at a hearing (tick):

☐ Yes ☐ No

Please note **ALL** information provided in this submission will be made publicly available

☐ I understand

Jonathan Speedy

10/12/2024

*Signature of Submitter (or person authorised to sign
on behalf of the submitter)**

Date

*If signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

*A signature is not required if you make your submission electronically.

NOTE TO SUBMITTER

If you are making a submission to the Environment Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

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.

Submission on Notified Resource Consent Application - RM230149

Submitter Details: Tekapo Landco Limited & Godwit Leisure Limited

Proposed activity: Application by Queenstown Commercial Parapenters Limited to establish and operate a commercial tree-climb ropes course and picnic facilities alongside Lakeside Drive in the Takapō | Lake Tekapo township.

My submission is:

Tekapo Landco Limited & Godwit Leisure Limited (TL&GL) oppose the proposal and seek that Council decline the resource consent application, on the basis that:

- the proposal will result in adverse effects on the environment, landscape character and visual amenity that are more than minor
- the proposal is contrary to the relevant objectives and policies of the Mackenzie District Plan
- the proposal does not pass the s104D 'gateway test' for Non-Complying Activities
- the proposal is contrary to Part 2 of the RMA 1991 as it will give rise to adverse effects on the following s6 Matters of national importance:
 - (a) the preservation of the natural character of lakes and rivers and their margins
 - (b) the protection of outstanding natural landscapes
 - (d) the maintenance and enhancement of public access to and along lakes
- the proposal is contrary to Part 2 of the RMA 1991 as it will give rise to adverse effects on the following s7 Other matters:
 - (c) the maintenance and enhancement of amenity values.

The reasons for my submission are:

1. STATUTORY MATTERS

a. Relevant provisions of the Mackenzie District Plan:

With regard to the applicable provisions of the Mackenzie District Plan, the subject site of the proposed activity is located within the 'Passive Recreation Zone' (Rec P) of the Operative Plan, and the notified Open Space Zone of Stage 4 – PC 29 of the District Plan Review. The following overlays apply to the site:

- Area of Visual Vulnerability (High)
- The Flight Path Protection Area
- The Mackenzie Basin Sub-Zone
- Designations MDC-51, MDC-29, MDC-53 (Stage 4 Notified Overlay)
- Flood Hazard Assessment Overlay (Stage 4 Notified Overlay)
- Liquefaction Overlay (Stage 4 Notified Overlay)

Lake Tekapo, immediately adjacent to the site is subject to the following overlays:

- Outstanding Natural Landscape
- Sites of Natural Significance
- Area of Visual Vulnerability (High)
- Sites and Areas of Significance to Māori

The application material and the Council s95 assessment are deficient in that they do not address the following provisions of the District Plan Review. Stage 1 and 2 of the review are operative, and decisions on the Stage 3 provisions were made on 5 August 2024. Rules of Stage 3 that are not subject to appeal must be treated as operative under s86F of the RMA. Specifically, this includes:

- *Part 2 District Wide Matters – Strategic Direction*
- *Part 2 District Wide Matters - Natural Features and Landscapes Chapter* – this chapter applies to Lake Tekapo as an ONL and whilst the site itself is not within an ONL, the effects of activities on the adjacent ONL must be considered against the provisions of this chapter, including the Landscape Guidelines in NFL-SCHED3.
- *Part 2 District Wide Matters - Natural Character Chapter* – objectives and policies, and setback rules under NATC-S1 which specifies a required setback of 25m for the Open Space Zone. It is considered that rule NATC-S1 as it relates to the site has immediate legal effect under s86B of the RMA as it relates to water.

The application also does not address the provisions of Stage 4 of the District Plan Review, including provisions applicable to the recently notified rezoning of the site to ‘Open Space Zone’ and the Hazards and Risks overlays. It is accepted that the application was notified prior to the Stage 4 provisions being notified, however, these Stage 4 provisions now carry weight in the consideration of the application under s104 of the RMA.

Fundamentally, the proposal is considered to be contrary to the purpose of the zone and the objectives and policies applicable to both the Operative Rec P zoning, and the notified Stage 4 Open Space Zoning, which both identify the purpose of the Lake Tekapo Open Space areas as being predominantly for passive recreation. The Stage 4 notified provisions for the OSZ identify the maintenance of lake views and accessibility to the lake being particularly important, and under OSZ-P3 that other activities are only allowed within the zone where they:

1. *have a functional need or operational need to locate within the zone; or*
2. *are compatible with the purpose of the zone and do not conflict with recreational uses;*
and
3. *are of a location, nature and scale that does not preclude development of new open space and recreational activities.*

The proposal is not considered to meet the criteria of OSZ-P3.

b. s95 notification and affected persons assessment:

The application is located on land owned by the Mackenzie District Council. It is not clear whether the Council has provided an Affected Party Approval to the application as the landowner, nor does the Council’s s95 limited notification assessment identify Council as a potentially affected party.

The Council’s s95 limited notification assessment also did not specifically identify TL&GL or the residents of Station Bay (existing and future) as affected persons. The assessment of effects from these locations has not been addressed in sufficient detail.

c. Effects on the existing environment

The assessment of effects is deficient in that it does not consider the existing (lawfully established) use of Lot 5 DP 455053 for overflow camping activities as part of the existing environment. The Council’s s95 report states at page 29 that “*The lease is a matter unable to be considered as part of this assessment and there is a separate process for any issue relating to the*

lease to be resolved”. However, whilst property rights are accepted as being a separate matter, the effects of the proposal on the activity remain RMA considerations. It is considered that the proposed tree ropes activity will give rise to adverse environmental effects on established lawful camping activities (including persons) on the site. The two activities are not considered to be able to be undertaken together.

d. Assessment of alternatives

For the reasons outlined in this submission, it is considered that the proposal is likely to result in significant adverse effects on the environment, and as a result Schedule 4 Clause 6(1)(a) specifies that *“if it is likely that the activity will result in any significant adverse effect on the environment, a description of any possible alternative locations or methods for undertaking the activity”*. An assessment of alternatives has not been provided. TL&GL consider that there are more appropriate alternative locations for the proposed adventure activity.

e. s104D ‘Gateway Test’ for Non-Complying activities

For the reasons outlined in this submission, the proposal does not pass s104D of the RMA 1991 for non-complying activities, as the adverse effects of the proposal are considered more than minor, and the proposal is contrary to the objectives and policies of the District Plan. Accordingly, it is considered that consent cannot be granted for the activity.

2. EFFECTS ON THE ENVIRONMENT

a. Effects on recreational values

The subject site of the proposed activity is located along the Tekapo lakefront. Whilst it is acknowledged that the land does not have the status of a reserve under the Reserves Act 1977, for all intents and purposes the land functions as a reserve, is zoned for this purpose under the District Plan, and is used by the community in this manner. The site is a valued recreational area on the lakefront, providing opportunities for shade and passive enjoyment of the lake and surrounding areas, for which its passive use has value in its contrast to the activities occurring within surrounding urban areas.

The effectively permanent presence of structures and zip lines within the existing trees is considered very likely to exclude public use of the land underneath, irrespective of the proposal to incorporate signage to highlight the ropes course is a public area. In this regard, TL&GL agree with the opinions expressed by Bron Faulkner in her landscape peer review, particularly her statement that: *“The activity and noise overhead and on the ground is likely to make the area unattractive for the passive recreation activities that the area currently provides...”* and her comments that the effects of the proposal on these values cannot be mitigated.

The operational hours of 7 days per week and 365 days per year are considered inappropriate.

b. Effects on landscape, visual amenity and Part 2 matters

Rough Milne Mitchell (RMM) landscape architects have reviewed the notified application on behalf of TL&GL and their comments are included in the Landscape Memo included in **Attachment A**. In summary, they do not agree with the conclusions reached by the applicant’s landscape assessment and consider the proposal to be inappropriate in this location.

RMM consider that the landscape assessment provided is insufficient, does not address all relevant matters of the District Plan and Part 2 of the RMA, and has not been undertaken in

accordance with best practice methodology as informed by the *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (TTatM Guidelines)* (July 2022). RMM highlight that the receiving environment has not been adequately defined and assessed, nor have the effects from affected neighboring property owners, including the holiday park, nearby residents and landowners of Station Bay, been sufficiently considered. In their opinion, the potential adverse effects have not been thoroughly assessed and they do not agree with the conclusion reached in the applicant's landscape assessment and RFI Response undertaken by DWG Landscape Architecture.

Lake Tekapo, combined with adjacent areas and the Southern Alps beyond are identified as Outstanding Natural Landscapes (ONL). Whilst the site itself is not within an ONL, the zip lines and structures associated with the proposed activity are within the margins of the lake and from locations to the west and south will be viewed within the setting and foreground of the ONL. From these locations, the visibility of people and unnatural elements within the trees is considered to have more than minor adverse effects on the landscape and visual amenity values of the ONL. This includes views experienced from the existing and future residential area of Station Bay and the Lakes Edge Holiday Park.

c. Effects on the Tekapo Holiday Park

The Council's s95 assessment and the applicants landscape assessment do not sufficiently address landscape and visual effects on the adjacent holiday park and its visitors. The RMM memo (**Attachment A**) provides additional images of the site as seen from the holiday park which provide alternative context to the views addressed by DWG.

The Council's s95 assessment considers that effects on the holiday park and its guests will be "*transient and less than minor*". It is true that visitors to the holiday park are transient, however that is the nature of visitor accommodation activity. This should not discount the significance of the values they obtain (or adverse effects they experience) whilst visiting. Current views from sites within the holiday park towards the lake have natural value to visitors, as is the proximity to the lake and convenient access to this area of reserve land. The practical exclusive occupation of this land by the proposed tree ropes course and structures will adversely affect the natural amenity and landscape character of the ONL beyond as experienced by visitors, and additionally is likely to discourage their use of this part of the lakefront for passive recreation.

The proposal is considered to give rise to inappropriate adverse landscape and visual amenity effects from the Tekapo Holiday Park.

d. Effects on the Station Bay residential development

The Council's s95 assessment and the applicants landscape assessment do not sufficiently address landscape and visual effects on the adjacent Station Bay residential subdivision. The applicant's landscape assessment undertaken by DWG Landscape Architecture states:

27. From the majority of sections (Lots 17 - 48) in Station Bay Subdivision, the Base Station and climbing course will not be visible due to the topography of the land being approx 12m to 20m in elevation above the site, and future neighbouring properties and landscaping blocking the view of the Tree Climbing Course (refer ATTACHMENT A & K).

28. From Lots 1 - 5 and Lots 9 - 16 at an approx elevation of 3-10m above the site, sections of the Base Station, climbing wires ropes and platforms will be partially visible

when viewed through scattered existing vegetation and Pinus trees (refer ATTACHMENT L & M).

However, the degree of effects experienced from Station Bay are not considered. It is noted that the Station Bay development has a terraced arrangement with built form likely to comprise two-storey housing forms, terraced up the slope and with primary living areas oriented towards views of the lake. While some dwellings may block some aspects of the view of the lake, the site and proposed structures will remain visible from many properties and it is not accurate that *“From the majority of sections (Lots 17 - 48) in Station Bay Subdivision, the Base Station and climbing course will not be visible”*.

The proposal is considered to give rise to inappropriate adverse landscape and visual amenity effects from the Station Bay residential development.

My submission would be met by the Council making the following decision:

It is requested that the application is refused by Council.

TL&GL wish to be heard in support of this submission. TL&GL will continue to provide expert input from their landscape, planning and legal team in support of this submission.

ATTACHMENT A – LANDSCAPE MEMO, ROUGH MILNE MITCHELL LANDSCAPE ARCHITECTS

Memorandum

10 December 2024

Attention
*Jonathan Speedy Covington
Group*

Issued by
*Tony Milne
RMM Landscape Architects*

RMM Job No.
24224

RM230149 - Queenstown Commercial Parapenters Limited – Proposed Tree Climb Activity Park, Tekapo.

Introduction

RMM have been engaged by the owners of the Tekapo Holiday Park at Lakeside Drive, and the adjacent land at 'Station Bay' to provide landscape planning expertise in their submission in opposing RM230149. We set out our position in the following memo. In the preparation of this memo, we have reviewed the following:

1. Application for Land Use Consent – McKenzie District Council RM230149 – Queenstown Commercial Parapenters Limited (December 2023);
2. DWG Landscape Architecture Assessment of Landscape and Visual Effects (October 2023);
3. DWG Optional Council Development Landscape Plan (14 June 2024);
4. RM230149 Peer Review of Landscape Assessment prepared for Mackenzie District Council by Ms Bron Faulkner (3 May 2024);
5. Section 92 Request for Further Information (RFI) letter by Kirstyn Royce (25 January 2024);
6. Section 92 RFI response by Annabel Crosby (April 2024);
7. Section 95A-F Notification Decision by Darryl Millar Independent Planning Commissioner (14th October 2024).

The Proposal

The proposed tree climb course will be located within the lake margin of Lake Tekapo, operating as a commercial recreation activity between the hours of 9am-7pm seven days per week, 365 days per year. During peak times, at capacity, there may be up to 60 people on the course at any one time and up to 250 persons per day. Built form will consist of a (58.56m²) base station 12.12m x 4.8m x 2.6m(h), comprised of two re-purposed shipping containers clad in Corten steel / natural timber with glazed windows and 2.5m² signage. Separate adult and child courses will be constructed of a series of ropes, wires, wire bridges, platforms, and zip lines located 3m - 10m above ground around existing *Pinus sp.* trees located on the site.

Landscape mitigation is proposed, comprising clusters of trees and mass plantings of native hard tussock to integrate built form into surrounding landscape. Construction is estimated to be undertaken in stages over 6-8 weeks.

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Planning Context

The site is located along the Lake Takapō lakefront and forms part of Takapō township open space network. The area is zoned Recreation P / Passive Recreation in the Mackenzie District Plan (**MDP**) and lies within an area identified as having high visual vulnerability and a flight path protection area.

The proposed Tree Climb Activity Park is a **non-complying** activity under the MDP.

Approach

RMM have reviewed the aforementioned material, and in particular the DWG Landscape Architecture Tree Climb Activity Park Assessment of Landscape and Visual Effects and the RM230149 Peer Review of Landscape Assessment prepared for Mackenzie District Council by Ms Bron Faulkner (3 May 2024). We have not provided a re-assessment of Landscape and Visual Assessment matters, rather we have identified the following key matters that we do not believe have been addressed sufficiently within the application. These are:

1. Visual effects on the holiday park and residents of Station Bay of 'unnatural' structures within the views of/towards the Lake (an ONL)
2. Effects on passive recreation values of the reserve and obstruction of passive use of the land underneath the course
3. Effects of 'busy-ness' and potential constant views of people within the trees and within views of the Lake from the south-west

We generally find the DWG Report lacking the fundamental material required for a full and complete landscape and visual assessment, with matters addressed insufficient in relation to the assessment of a non-complying activity for a site located adjacent to / in the foreground of an ONL. Rather, we find favour with the conclusions reached by Ms Faulkner in her peer review, which considered matters directly in relation to the ONL setting.

Matters Arising

The following matters are those considered unaccounted for, incomplete or understated from a landscape and visual perspective:

- Overall, the visual effects do not appear to have been sufficiently considered from a landscape perspective, nor were any of the

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adjacent landowners (including the holiday park, visitors and residents of Station Bay) considered to be directly affected persons.

- The DWG report reviews the proposal against the MDP Objectives, Policies and Rules in relation to the provisions for **discretionary activities**. This seems to be erroneous. It is our understanding the overall activity status for the proposed Tree Climb Activity Park is **non-complying** under the MDP pursuant to Recreation P Zone Rule 4.7.4 – Buildings and Structures for all activities not associated with passive recreation in the Recreation P Zone require resource consent as a non-complying activity.’
- Within the DWG report there is no reference to the methodology used in their assessment, RMA relevant statutory documents / policy framework or rating scale for a non-complying activity. Current best practice methodology and terminology used in the Assessment of Landscape and Visual Effects is informed by the Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (TTatM Guidelines) (July 2022). This methodology, which involves undertaking detailed description of the landscape character and values within the site and receiving environment and assessing the proposals actual and potential landscape effects including the context and framework of statutory documents / RMA legislation has not been used by DWG.
- Within the DWG report there is no reference to the extent / area of the 8,210m² ‘site’, legal reference of lot titles, public lakefront margin reserve status / Recreation Passive (P) zoning under Operative Mackenzie District Plan, Outstanding Natural Landscape classification of Lake Tekapo, and overlays of Area of High Visual Vulnerability, Flight Path Protection and Area of Significance to Māori.
- There has been no assessment of the proposed development against the relevant MDP provisions. In particular the Objectives and Policies of Recreation P (Passive) Zone, Non-Complying Activities Rule 4.7.4 All buildings and structures for activities not associated with passive recreation, Assessment Matters 4.8-4.8.12 for non-complying activities under the MDP and Natural

Features and Landscapes Chapter, Landscape Guidelines NFL-SCHED3 have not been addressed.

- Fundamentally within the DWG report the extent of the receiving environment has not been clearly defined and there is no description of the receiving environment or the site in terms of landform, landcover and land use, existing landscape character, or landscape values - the physical, perceptual or associative values which form the basis of an understanding of the receiving landscape, with no detailed discussion of effects on the adjacent ONL. In turn, this should inform the basis of the assessment of effects of the proposed tree climb course.
- Having reviewed the DWG RFI, we are of the opinion this still does not provide sufficient information regarding the existing natural landscape character and values of the site and receiving environment of Lake Tekapo ONL to reach the conclusion they have. More specifically, the high natural character, open space, visual amenity, ecological, cultural, historical, and recreational values attached to the receiving environment and the site have not been acknowledged or fully considered.
- Given our understanding of the receiving environment, along with permitted activities within the Recreation P zone (now notified as 'Open Space Zone' under PC29), we do not agree with the conclusion reached by DWG regarding Section 7 - Other Matters, particularly 7(c) matters regarding the maintenance and enhancement of amenity values.
- The DWG RFI Response concludes that the proposed tree climb activity park and base station at Lake Tekapo's southern end will introduce minor changes to the open space amenity. And that the proposed mitigation measures, such as limiting the number of users and strategic planting will maintain open space amenity and the visual continuity of the landscape. It is considered the effects of the development will be no more than minor and the overall character and appeal of Lake Tekapo's open space amenity will be preserved.
- Having reviewed the DWG RFI Response, we do not reach the same conclusion. Although Open Space Amenity has been discussed, consideration has not been given to the degree of

effects on existing open space values, which will invariably be reduced by the proposal, with the resultant effect being the 'privatisation' of public recreational space for commercial purposes. Furthermore, the proposed tree climb activity park denotes 'active' rather than 'passive' recreational use, which is in conflict with the objectives and policies of its zoning.

- In regard to viewpoint selection and the assessment of visual effects from each, these are not accurately described, there is no description of the view, existing landscape character, amenity / open space values. Further to this, there is no description of potential or actual issues / changes arising from the proposed ropes tree climb activity. Specifically, the assessment of potential effects of the development includes 'unnatural' structures within the views of Lake Tekapo ONL, views of people within the trees and within background views of the lake within an Area of Visual Vulnerability (High). *We include a selection of photos following, noting they are for reference only and not used for an assessment of effects.*



Photo 1: Existing view of Lake Tekapo as experienced from inside Tekapo Holiday Park Backpacker Accommodation.

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Photo 2: Existing view of Lake Tekapo as experienced from outside Tekapo Holiday Park Backpacker Accommodation.



Photo 3: Existing view of Lake Tekapo as experienced from Lo1 1 Station Bay.



Photo 4: Existing view from the top of the entrance ramp into the camp where there is the outdoor dining area.

- The degree of visibility and adverse visual effects on existing landscape character, visual amenity and open space values of the site and surrounding Lake Tekapo ONL have not been determined using the seven-point scale of degree of effects outlined by (TTatM Guidelines) (July 2022). After mitigation measures are considered, the effects are assessed by DWG as being less than minor. The table included in Figure 1 outlines the rating scales generally referred to, with the table included in Figure 2 being a comparative scale between the seven-point scale, and the RMA s95 notification determination test.

Very Low	Low	Low - Moderate	Moderate	Moderate - High	High	Very High
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Figure 1. The seven-point landscape and visual effects rating scale. TTatM.

Very Low	Low	Low - Moderate	Moderate	Moderate - High	High	Very High
Less than Minor	Minor		More than Minor		Significant	

Figure 2. The comparative scale of degree of effects. TTatM.

- After mitigation measures are considered, the effects are assessed by DWG as being less than minor.
- Further to the above, we do not consider the viewpoints are fully representative of the extent of visibility within the receiving environment. The potential visual effects of the proposal from affected neighbouring property owners, including the holiday park, nearby residents and landowners of Station Bay have not been included or sufficiently considered from a landscape perspective. In some instances, locations are mentioned without recognition or identification of specifically affected persons / landowners which would likely have triggered the application to be publicly notified.
- But irrespective, the potential degree of effects from these locations have not been thoroughly considered in detail, appearing to have been glossed over. An example of this is at [27] of the DWG report where conclusions are reached regarding non visibility of the proposal from Lots 17- 48 in the Station Bay Subdivision. It is our experience that housing designs are likely to be two storeys with views and main living areas will be oriented towards the lake and so we don't think this statement that future properties and landscaping would block the view from upper lots is entirely accurate.
- The assessment does not include an assessment of landscape effects – more specifically, the degree of potential adverse effects on existing landscape character and open space values of the site and Lake Tekapo ONL surrounds, potential effects of constant activity / 'busy-ness' on passive recreation values of the reserve and obstruction of passive use of the land underneath the course, effectively the privatisation of public recreational space.

Conclusion

Overall, we believe that the potential adverse effects have not been thoroughly assessed and therefore we do not agree with the conclusion reached in the DWG report and RFI Response that *'the tree climb activity park is therefore considered to be an appropriate development within the Recreation P Zone which and will be a positive addition to the Lake Tekapo Township, with no more than minor visual and landscape effects.'*

It is our opinion the potential visual and amenity effects arising from the proposed tree climb activity park will be more than minor. The proposal as it stands is inappropriate within this location.

Tony Milne (Fellow) NZILA

10 December 2024