

Before the Independent Hearings Panel
At Central Otago District Council

Under the	Resource Management Act 1991 (RMA or Act)
In the matter of	an application for subdivision and land use consent to establish another 44 residential allotments in the rural resource area at 112 & 144 Ripponvale Road, Cromwell (RC250155)
And	New Zealand Cherry Corp (Leyser) LP Applicant

Evidence of Tony Douglas Milne – Landscape

24 July 2026

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**anderson
lloyd.**

Introduction

- 1 My full name is Tony Douglas Milne. I am a Registered Landscape Architect and founding Director of RMM which was established in 2010.
- 2 I hold a Bachelor of Arts degree from the University of Canterbury and a Bachelor of Landscape Architecture degree from Lincoln University. I am a Registered Member and Fellow of the New Zealand Institute of Landscape Architects Inc.
- 3 I have been practising as a landscape architect since 1995. Our consultancy is involved in a wide range of landscape design and land planning projects throughout New Zealand. Many projects have involved preparing reports and evidence, which address matters of visual impact and landscape effects concerning proposed developments
- 4 I have appeared as an expert witness at both Council level and Environment Court hearings on numerous occasions including most recently in relation to:
 - (a) Plan Change 14 (Shannon Farm, Cromwell) to the Central Otago District Plan
 - (b) Plan Change 19 to the Central Otago District Plan.
 - (c) Fast-track Application – Ridgeburn, Arrowtown
 - (d) Fast-track Application - Homestead Bay, Queenstown.
 - (e) Fast-track Application - Studio Hub, Ayrburn, Arrowtown.
 - (f) Fast-track Application – Maitahi Stage One, Nelson.
 - (g) Fast-track Application – Flints Park, Ladies Mile, Queenstown
 - (h) Te Pūtahi Ladies Mile Zone Extension, Queenstown.
 - (i) Proposed Variation 2 (Additional Housing Capacity) to the Second-Generation Dunedin District Plan.
 - (j) Subdivision and land use consent application for subdivision and development at 88 Terrace Street, Bannockburn.
 - (k) Victoria Flats Industrial Subzone to the Queenstown Lakes Proposed District Plan.
 - (l) Private Plan Change 28 to the NRMP – Maitahi, Nelson.

- (m) Waimakariri District Plan Variation 1 – General and Medium Density Residential rezoning including Bellgrove South, Doncaster, Kaiapoi South, Mandeville and Ohoka.
 - (n) Waimakariri District Plan Variation 1 – Rangiora Airfield rezoning.
 - (o) Gibbston Valley Resort Zone to the Queenstown Lakes Proposed District Plan.
 - (p) Proposed Selwyn District Plan Variation 2: Levis Road (Large Format Retail) rezoning, and
 - (q) Proposed Selwyn District Plan: General Industrial Zone Extension.
- 5 I have prepared this brief of evidence in relation to an application by New Zealand Cherry Corp (Leyser) LP (**Applicant**) to the Central Otago District Council (**CODC** or **Council**) for subdivision consent and land use consent (RC250155, **Application**) to establish an additional 44 residential allotments in the Rural Resource Area (5) at 112 & 144 Ripponvale Road, Cromwell (**Site**).¹
 - 6 My role in the Application included a peer review of the Landscape Assessment Report prepared by RMM², dated 9 June 2025 (**LAR**). I also prepared the initial masterplan, prepared and presented evidence on behalf of the applicant that related to PC 14 which enabled the rural lifestyle development that is Shannon Farm. I have visited the Site on numerous occasions, most recently on 19 February 2025 with the Council's representative landscape architect.
 - 7 My evidence is based on the LAR, the accompanying graphic material, my knowledge of Shannon Farm, and the matters raised in the landscape peer review prepared by Boffa Miskell for Council. I will not traverse all of the content of the LAR in this evidence, rather for expediency I will concentrate on those matters of disagreement between myself and Council's representative landscape architect **Ms Harshey**.

¹ Legal Description(s): Section 54 Block III Cromwell Survey District, Section 26, 100 Block III Cromwell Survey District, Section 27-28, 96, 99, 102 Block III Cromwell Survey District, Lot 2 Deposited Plan 330709 and Section 4, 11, 98, 101, 103 Block III Cromwell Survey District and Part Section 5, 25 Block III Cromwell Survey District and Part Run 1201R

² Rough Milne Mitchell Landscape Architects Limited. Landscape Assessment Report. Proposed 44 additional lots. Shannon Farm. 9 June 2025. Prepared by Emily-Rose Dunn, Reviewed by Tony Milne and Nikki Smetham

Code of Conduct

- 8 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of Evidence

- 9 My evidence will address the following:
- (a) executive summary;
 - (b) description of the Proposal;
 - (c) key points from the RMM LAR dated 9th June 2025;
 - (d) response to matters raised in the peer review prepared by **Ms Harshey** and the section 42A report by **Mr McIntosh** on behalf of the Central Otago District Council (**CODC**); and
 - (e) conclusion.
- 10 Appended to this evidence is the Landscape Assessment Report (**LAR**) and the Graphic Attachment (**GA**). I refer to the GA throughout my evidence.

Executive Summary

- 11 In my opinion, the RLA 3 and RLA 4 parts of the Proposal represent a logical intensification of the consented Shannon Farm development, while the RLA 6 part of the Proposal is a coherent extension of the consented Shannon Farm development. The Proposal responds appropriately to the Site's landform and the rural lifestyle development pattern anticipated for Shannon Farm.
- 12 I agree with **Ms Harshey** that the RMM methodology is appropriate and that the LAR provides a comprehensive description of the receiving environment. I also agree there is substantial common ground in relation to RLA 3 and RLA 4.

- 13 The additional lots within RLA 3 and RLA 4 are largely internalised within the consented Shannon Farm development. They will be visually absorbed by the existing landform, consented development, and planting. In my opinion, adverse landscape and visual effects associated with RLA 3 and RLA 4 will be **very low**. Ms Harshey agrees with this³.
- 14 The more sensitive part of the Proposal is RLA 6. As is the case for RLA 2 and parts of RLA 3, RLA 4 and RLA 5, RLA 6 is within the Significant Amenity Landscape (**SAL**) overlay. The proposed residential allotments within RLA 6 will sit on the lower slopes, adjacent to the consented Road 001 alignment. They avoid⁴ the upper slopes, the Outstanding Natural Landscape (**ONL**), and the No Build Area⁵.
- 15 I acknowledge that the proposal within RLA 6 will introduce a greater degree of domestication than the anticipated single allotment outcome. However, I do not consider that change to be fundamental or unacceptable from a landscape perspective. The proposed built form with RLA 6 will be visually connected with the consented and anticipated development of Shannon Farm, while the balance of RLA 6, approximately 36.0 ha, will remain open pastureland.
- 16 In my opinion, the proposed RLA 6 lots will have **low** to **low-moderate** adverse landscape and visual effects. Those effects are appropriately managed by building controls, curtilage controls, post-and-wire fencing requirements, naturalised planting requirements, and the retention of the open upper slopes.
- 17 I do not agree with **Ms Harshey's** conclusion that the RLA 6 component of the Application undermines the Structure Plan or results in unacceptable effects on the SAL. In my opinion, while it is a departure from the Structure Plan, the Proposal maintains the legibility of the broader foothill slope, avoids the most sensitive areas, and will read as a coherent extension of the consented Shannon Farm development rather than a separate or discordant band of development. The development proposed within RLA 6 will not interrupt the legibility and visual coherence of the SAL nor the upper (and unchanged) extents of RLA 6 and the SAL and therefore to use Ms Harshey's own words the 'implication for landscape values'⁶ will have a

³ Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. para 8.2

⁴ The proposed residential allotments within RLA 4 are 100m away from the ONL and the proposed residential allotments in RLA 6 are 200m away at the closest point.

⁵ As identified on the CODP 19.23 Structure Plan

⁶ Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. para 8.11

low-moderate⁷ landscape effect on the SAL due to the constrained magnitude of change..

- 18 Importantly, the proposal is not a fundamental shift from the level of development supported by Council's representative landscape architect for the PC14 Hearing. At that time, the structure plan proposed subdivision throughout the now RLA 6 area to a minimum lot size of 3ha, together with application of a no build area. Mr Espie and I agreed that rural living activities anticipated by that version of the structure plan would introduce a busyness to the SAL and that:

'There will be some effect on the openness and naturalness of the hill slopes that lie within the SAL but this will be of a low degree and will be considerably contained. From some particular viewpoints, visual amenity will be affected to a degree that ranges up to moderate-low'⁸.

During subsequent mediation with another council representative Ms Steven, it was agreed that the potential effects of the development anticipated by the revised structure plan (including only one RLA 6 allotment)⁹ on the values of the SAL will be **low**¹⁰. I consider my assessment of the effects of the proposed RLA 6 lots on the values of the SAL is consistent with those earlier assessments.

- 19 Notably, at all times the No Build Area was included as a principal mechanism to protect the most sensitive landform within the SAL. That sensitivity arises from its basin-wide visibility, legible folded landform, and visual connection to the ONL.
- 20 Development does not need to be avoided within the SAL, with the lower aspect (particularly outside the No Build Area) having capacity to absorb some development as demonstrated by the anticipated subdivision already present within the SAL / RLA 2, RLA 3 RLA 4 and RLA 5 areas of overlap, and the fact that Ms Harshey generally supports the intensification of the RLA 3 and RLA 4 areas as proposed by this Application.

⁷ Rough Milne Mitchell Landscape Architects Limited. Landscape Assessment Report. Proposed 44 additional lots. Shannon Farm. 9 June 2025. page 33

⁸ Landscape and Visual effects Assessment – Peer Review. CODC PC 14 – NZ Cherry Corp – Shannon Farm. Proposed Plan Change to create a rural living resource area at Ripponvale. Report prepared by Vivian+Espie. 20th April 2020. Page 11.

⁹ CODP 19.23 Structure Plan, also included on Sheet 7 of the GA

¹⁰ ENV -2021-CHC-73. Joint Witness Statement – landscape. dated: 10 December 2021. In attendance Tony Milne and Anne Steven. Para 9

Description of the Proposal

- 21 The Proposal seeks consent to increase the density of residential allotments within RLA 3, RLA 4, and RLA 6 at Shannon Farm as shown on Sheets 12 and 13 of the GA..
- 22 The Proposal will create 44 additional residential allotments. This will increase the total number of residential allotments within Shannon Farm from 160 to 204¹¹.
- 23 In summary:
- (a) RLA 3 will gain six additional allotments.
 - (b) RLA 4 will gain 22 additional allotments.
 - (c) RLA 6 will gain 16 additional residential allotments, resulting in 17 residential allotments and one balance lot. The residential allotments range from 2290 m² to 5150 m², with an average allotment size of 3400 m². The balance lot is approximately 36.0 ha and will be retained as open pastureland.
- 24 No allotments are proposed within the ONL or within the No Build Area identified in the Structure Plan.
- 25 All 17 residential allotments proposed within RLA 6 are within the SAL overlay. Some additional lots within RLA 3 and RLA 4 are also located within, or partly within, the SAL overlay (refer Sheets 12 and 13 of the GA).
- 26 The Proposal does not seek changes to the reflectance rating, planting, lighting, materials, yard setbacks, fencing, or height standards and controls that apply to RRA (5)¹². Furthermore, there are no changes proposed to the existing planting controls for Rural Resource Area (5) (**RRA (5)**)¹³.
- 27 While the proposal does not seek to change, amend or alter in any way the specific standards of RRA (5) that will apply to future development across the Site it is acknowledged that three of the proposed building platforms, and therefore potentially future buildings within these platforms, are not

¹¹ In the LAR the residential lot numbers are stated as 151 consented allotments with the additional 44 allotments resulting in a total of 195 allotments. Since the application was lodged in June 2025 an additional 9 allotments have been consented under RC220396V4/ RC250169. The updated figures of 160 consented allotments with the additional 44 lots resulting in a total of 204 lots has been referred to throughout this report. The 'additional' nine allotments are located along the western-most edge of Shannon Farm and have no material impact on the assessment.

¹² CODP: 4.4.18, 4.7.2.ib.e, 4.7.6.f, 4.7.6.l,m,n and o, 4.7.6.C.f, 4.7.6.D.i,ii and iii,

¹³ CODP Schedule 19.25

entirely in accordance with the CODP zone setback requirements, as outlined in full in **Mr Woodward's** evidence, reproduced below for ease of reference:

'A discretionary (restricted) activity pursuant to Rule 4.7.3(x) for a breach to the internal setback requirements of Rule 4.7.6(A)(L)(iii). This rule requires that any site within Rural Resource Area (5) adjoining the Rural Resource Area must maintain a minimum 25 metre setback from the zone boundary. The RBPs on Lots 118, 127 and 128 are located approximately 10m from the Rural Resource Area boundary and therefore do not comply with this standard¹⁴'.

- 28 Given the scale and landscape context (being the Shannon Farm Development) the deviation of three building platforms being located 10m from the Rural Resource Area zone boundary, the actual effects on rural amenity and landscape values will be negligible. Furthermore, the building platforms are 1000m² in area and in reality, the likelihood of potential owners building within this building platform 'edge to edge' are low. Additionally, residential dwellings typically have amenity planting, which will further reduce any potential effects (which are already negligible).
- 29 Whilst this is a deviation from the setback standards of the CODP as they relate to zone boundaries, it will not change nor contradict the yard requirements within the RRA (5) of 10m within RLA 4¹⁵.

Summary of the Initial Landscape Assessment Report

- 30 RMM prepared a LAR for the Proposal which was included in the Application. In this section I will provide a brief summary of that assessment.
- 31 The initial assessment considered the potential landscape and visual effects of the proposed development on the Site and its surrounding environment, with a focus on compliance with the Central Otago District Plan (**CODP**). The assessment accounted for the Site's anticipated and consented development as well as the landscape values particularly in relation to the SAL and its aesthetic beauty, openness, visual coherence and legibility, and evaluated the importance of preserving these characteristics in the development.

¹⁴ Evidence of Mr Woodward - Planning, dated: 24 July 2026. para 26 (d)

¹⁵ CODP 4.7.6.I

Description of the Site and Receiving Environment

- 32 Shannon Farm is located north-west of Cromwell, within the Cromwell Basin. Shannon Farm sits between the more developed basin floor and the lower slopes leading towards the Pisa Range (refer Sheets 4 and 5 of the GA).
- 33 The receiving environment includes the Site, the wider Shannon Farm development, a mix of orchards, vineyards, rural-retail, accommodation and rural lifestyle properties along Ripponvale Road, the Cromwell Basin floor, the lower foothill slopes, and the Pisa Range ONL backdrop.
- 34 The Site is not an untouched rural landscape. It forms part of a wider property that has long been modified by rural production, orcharding, grazing, mining-related activity, water races, and more recently the consented Shannon Farm subdivision, (refer Sheets 9 — 11 of the GA)
- 35 Shannon Farm has been the subject of Plan Change 14, which introduced RRA (5) and a Structure Plan framework. That framework enables a range of rural lifestyle densities, productive rural uses, open space, recreation, and landscape controls.
- 33 The consented Shannon Farm development forms part of the existing and anticipated environment. The consented development includes 160 rural lifestyle allotments within six Rural Lifestyle Areas, together with Rural Lifestyle Production Areas (**RLPA**), amenity planting, internal circulation, and recreation links. In my opinion, the receiving environment must be assessed with that consented development in mind. It is not appropriate to assess the Proposal against a pre-PC14 pastoral baseline.
- 34 Stage One has recently been completed with the Stage Two works anticipated to commence later this year (2026). The Stage One works included access, bulk earthworks, roading infrastructure, extensive landscape works including planting, entry walls, and other development works. Of note, Road 001¹⁶ traverses from the Shannon Farm entrance, through the development, terminating at Lot 3002 DP 615998. Lot 3002 is a vested local purpose reserve¹⁷ containing water tanks, located within RLA 6 (immediately adjacent to the No Build Area). As it is already constructed, it provides a useful point of reference and visual marker for the Application.

¹⁶ As illustrated in Viewpoints 2, 5, 6, 7, 8, included in the GA and the Site Photos on Sheet 8 of the GA

¹⁷ This reserve has water tanks on it to provide potable water

Existing Landscape Character and Values

- 35 The landscape values of the Site and receiving environment are:

Physical Attributes

- 36 The Pisa Range is recognised as an ONL, with a distinctive landform that encloses the Cromwell Basin and Upper Clutha Valley and provides an open rural backdrop. Its foothills are characterised by complex gullies, spurs, rock ridges and schist outcrops, with climate extremes contributing to the serene character of the locality. Sheets 6 and 28 of the GA illustrates the extent of the ONL within the wider Shannon Farm site.
- 37 The SAL is characterised by its rural setting, spaciousness and open pastoral character across gently sloping and rolling foothills. Generally, the qualities of the SAL are identified and defined in the LA4 landscape report¹⁸ as being open pastoral character, legible landform and visual cohesion. Within the Site the land with an SAL overlay is topographically variable, with the overlay boundary not following any distinct or recognisable line or feature within the Site. The No Build Areas identified on the Structure Plan represent the most sensitive, visible, and legible parts of the SAL within the Site. The No Build Areas of the SAL have greater amenity values than the comparatively lower, and less visible slopes.
- 38 Within the Cromwell Basin stone fruit orchards, viticulture and associated vegetation patterns are defining features, while remnant indigenous vegetation is largely confined to steep damp gullies.
- 39 Shannon Farm is a comprehensive rural lifestyle development. Rural Lifestyle Production Areas (**RLPA**) are located on the lower slopes and will contain elements of productive rural character, while rural-lifestyle development (as consented) through the remaining RLAs will exhibit a graduated pattern of development, with smaller allotments concentrated in the more visually contained areas of the site and progressively larger or less developed areas toward the foothills.

Perceptual Values

- 40 The Pisa Range forms a vivid and memorable backdrop to the Cromwell Basin, with high aesthetic and scenic qualities, including long expansive views. The ONL has high legibility and natural character, expressed through schist outcrops, steep slopes and incised gorges.

¹⁸ Central Otago District Rural Review Landscape Assessment prepared by LA4 Landscape Architects (2008)

- 41 The SAL's aesthetic quality is conveyed through open, rolling pastoral hillslopes with visually consistent landcover and a perceived high level of natural character.
- 42 Transient qualities are present within the basin manifesting through seasonal changes in exotic foliage, dramatic contrasts from poplar shelterbelts and fruit trees, and the effects of the extreme climate through tussock colour, texture and the seasonal presence of snow on the surrounding mountains.
- 43 The Shannon Farm development is a comprehensive development with high rural-lifestyle amenity values, open space and recreation connections. The periphery of Shannon Farm has rural amenity values attributed to the RLPA in addition to the landscape values attributed to the ONL and SAL areas of the Site.

Associative Values

- 44 Associative values are linked to the growing recognition of the Cromwell Basin and wider Central Otago region as a recreational destination, particularly for holiday makers, lake users and hikers as well as establishing itself as a destination for mountain biking and multi-day bike trails. This is reinforced by the establishment of mountain bike tracks within the ONL part of the wider Shannon Farm site.
- 45 Cultural heritage values are associated with gold mining heritage, including remnant water races, sluices and tailings. These are mainly associated with the wider Cromwell Basin landscape, however, there remains a remnant water race that crosses the hillslope of the Shannon Farm site.
- 46 Tangata whenua values are associated with the network of mahinga kai, nohoanga and ngā ara tawhito along the Kawarau and Te Mata Au.

Landscape Effects Assessment

- 47 The LAR assessed the potential landscape and visual effects of the proposed subdivision on the receiving environments landscape character and visual amenity. The following key landscape effects were identified:
- 48 Visual effects assessments were undertaken from representative public viewpoints (refer Sheets 14 – 23 of the GA) at various distances from the Site, to assess the potential visibility of the proposed subdivision extension. An assessment was also made against the relevant statutory provisions from a landscape and visual perspective.

- 49 In terms of visual effects, it is considered that these could be categorised as long-range views (three kilometres or more), mid-range views (one to three kilometres) and short-range views (one kilometre or less). Refer to the table on Page 30-31 of the LAR that summarises these views.
- 50 The following key landscape and visual effects were identified in respect to each of the RLA's on Site, along with the respective landscape overlays on Site and the wider receiving environment.

RLA 3 and RLA 4

- 51 The proposed additional lots within RLA 3 and RLA 4 sit within the consented Shannon Farm development pattern. The additional lots with RLA 3 and RLA 4 and the potential adverse visual and landscape effects will be internalised within the consented Shannon Farm development thus resulting in **no to very low** degree of adverse effects. **Ms Harshey** agrees with this assessment and rating.
- 52 It is my opinion that the proposed additional lots within RLA 3 and RLA 4 will not result in any adverse effects that cannot be managed as development is proposed in accordance with the following expectations of the CODP:
- (a) Development remains within the RLA 3 and RLA 4 areas as identified on the structure plan, therefore the proposal does not introduce a new activity but rather it represents a rational intensification of the anticipated land use¹⁹. In other words, the proposal concentrates development in an area already intended for rural living. The proposed intensification will be indiscernible from beyond the Site due to the pattern of development already consented within Shannon Farm.
 - (b) It provides for varied lot sizes and shapes without adversely affecting the ONL, the SAL, rural amenity values nor surrounding rural landscapes²⁰ due to the internalised nature of the proposed intensification of RLA 3 and RLA 4.
 - (c) The development will be supported by the open space network already anticipated as part of PC 14 and the subsequent RRA (5) structure plan.

¹⁹ CODP 4.4.18

²⁰ CODP 4.3.10

RLA 6

- 53 The proposed RLA 6 lots are located on the uphill side of Road 001²¹. They will form part of the upper edge of the consented Shannon Farm development (refer Sheets 12 - 13 of the GA).
- 54 I acknowledge that the proposed 17 residential allotments in RLA 6 will introduce residential activity into an area that was previously anticipated to be held as one allotment. This change will increase the degree of domestication on the lower slopes of the SAL. However, development does not need to be avoided in order to maintain the legibility and visual coherence of the SAL.
- 55 This rationale is further strengthened by the presence of the anticipated development within the SAL. The structure plan for Shannon Farm²² includes the following anticipated development with the SAL:
- (a) All of RLA 2 with a minimum lot size of 3000m²
 - (b) Part of RLA 3 with a minimum lot size of 4000m²
 - (c) Parts of RLA 4 with a minimum lot size of 8000m²
 - (d) RLA 5 with a minimum lot size of 3 ha and
 - (e) RLA 6 with an area for locating a future building platform, and a No Build Area. Across the balance of RLA 6 (outside of the No Build Area), Policy 4.4.18:
 - (i) Makes some provision for buildings, seeking to avoid building in the area outside of the No Build Area "unless it be demonstrated that the legibility and open and natural character of the Rural Lifestyle Area 6 will be maintained"²³
 - (ii) Makes provision for subdivision around consented buildings where "subdivision will avoid adverse effects on, and maintain, the legibility and open and natural character of the Rural

²¹ As pictured on Sheet 8 of the GA and demonstrated on Sheets 12 and 13 of the GA.

²² CODP Structure Plan 19.23 and included on Sheet 7 of the GA, and the Structure Plan overlaid with the consented development is included on Sheet 11 of the GA.

²³ Policy 4.4.18.q.ii

Lifestyle Area 6 and will not result in delineation of boundaries through fencing or planting".²⁴

- 56 This demonstrates that not only is development anticipated and accepted within the SAL, but it can also support varied lot sizes from 3000m² – 3 ha, and development within RLA 6 could be provided for so long as it maintains the legibility and open and natural character of the RLA 6.
- 57 To this effect careful consideration has been given to the form of the proposed extension and as a result the proposed RLA 6 lots:
- (a) avoid the upper slopes;
 - (b) avoid the ONL;
 - (c) avoid the No Build Area with no overlap with the remnant water races;²⁵
 - (d) are located adjacent to Road 001 and consented residential lots;
 - (e) retain a substantial balance area as open pastureland;
 - (f) restrict curtilage areas and domestic activity to the proposed building platforms;
 - (g) restrict fencing to rural post-and-wire fencing on internal and rear boundaries; and
 - (h) require a naturalised planting arrangement rather than formal and linear boundary planting.
- 58 It is my opinion that this will avoid a conventional 'suburban' pattern extending into the upper slope²⁶. The proposed RLA 6 lots will read as a controlled and coherent extension to the lower edge of Shannon Farm. The bulk, and most visible parts, of the SAL slope will remain open, legible, and free of built development. I consider this achieves the policy intent of maintaining the legibility and open and natural character of the SAL.
- 59 The visual effects of additional lots within the RLA 6 will vary depending on viewpoint. From closer views, the effects will be more apparent. From mid and longer distance views, the RLA 6 lots will be seen in the context of the

²⁴ Policy 4.4.18.q.iv

²⁵ The remnant water races do not overlap with the proposed development in RLA 6. Within the existing consents for Shannon Farm there is no requirement to protect the affected water race's. For completeness the water races are mapped on Sheet 9 of the GA..

²⁶ Thus meeting CODP policy 4.4.18.q.iii and 4.4.18.q.iv.c and 4.4.18.q.v

wider consented Shannon Farm development and the existing rural lifestyle and productive landscape of the basin floor (refer Sheets 14 – 25 of the GA, and the table on Page 30 of the LAR).

- 60 Overall, I assess the adverse landscape and visual effects of the proposed development within RLA 6 as **low to low-moderate**.

Effects on the ONL

- 61 No development is proposed within the mapped ONL nor within the No Build Area. In my opinion, there will be no direct adverse effect on the Pisa Range ONL.
- 62 I also do not consider there will be an indirect effect on the appreciation of the Pisa Range ONL. The proposed RLA 6 lots are visually and physically separated from the ONL by the topographic landform described as the northern ridge as illustrated on Sheet 10 of the GA. The proposed intensification of RLA 6 will be below the sensitive upper slopes²⁷ and will be viewed in the context of the consented Shannon Farm development.

Effects on the SAL

- 63 The SAL classification is afforded to areas of the district where the landscape exhibits a degree of appreciation and sensitivity perhaps greater than that of a typical rural setting in the Rural Resource Area. All landscape experts agree that the SAL is a broad-brush categorisation at a district scale of landscapes with significant amenity. The values attributed to these landscapes are not specifically defined or provided for in the CODP. The values of each SAL therefore needs to be considered at a finer scale, in this case the site specific scale of Shannon Farm.
- 64 The Joint Witness Statement of landscape architects supporting resolution of PC14 by consent order described the character and values of the SAL that pertains to the Site as follows:

The lower terraces of the Pisa Range are partly encompassed within an SAL overlay, including the east gully within the Site. The SAL displays a moderate level of natural character, primarily attributed to the highly legible, visually distinctive folded landform, and has a high level of visual amenity. While modifications are present, when

²⁷ Mapped and defined in the CODP on the Shannon Farm Structure Plan 19.23. The purpose of the No Build Area is 'A No Build Area and designated area within RLA6 for locating future [buildings](#) ensures that [development](#) on the most highly visible areas valued for their open and legible character is avoided, while enabling [development](#) in the least sensitive area, and providing for potential [development](#) of the balance only where it is possible to maintain landscape values.' CODP 4.4.18 Explanation

viewed from greater distances the landform and broadly uniform colour/texture read most strongly. The existing SAL line alignment is the result of a high-level study, and the proposed realignment in the gully (coinciding with the ONL boundary) better responds to the topographical features of the Site. The existing SAL line over the east part of the Site mapped in the District Plan (Map 44) is agreed as correct.²⁸

- 65 I stand by this assessment of the SAL landscape Values. The values of the SAL as they relate to Shannon Farm are its moderate natural character, the highly legible, visually distinctive folded landform that exhibits a high level of visual amenity. The Structure Plan includes the provision of the No Build Area which was devised to ensure development is kept free from the saddle of the landform itself and thereby acts as a mechanism to prevent any development from compromising the legible, folded landform.
- 66 Accordingly, the upper slopes and ridgelines are considered and treated as the more sensitive part of the SAL. Development on the upper slopes and ridgelines of the Site would be more exposed, with a greater potential of disrupting the legibility of the folded landform, with the potential to reduce the openness, naturalness and visual simplicity that underpin the SAL's values.
- 67 The Structure Plan therefore concentrated larger lots and potential built form on the lower slopes, while applying No Build Areas across the upper slopes and ridgelines. The intent of this approach is to retain the most visually exposed and sensitive land as open space, while directing development to areas with comparatively greater capacity to absorb change.
- 68 In my opinion the proposal will not change the most visually exposed and sensitive parts of the SAL (identified as the No Build Area) within the Site and will have **no** adverse effects on the open, natural character and folded landform for which the landscape is valued. Furthermore, the proposed building platforms are between approximately 20 vertical and 70 horizontal meters away and 40 vertical and 200 horizontal meters away from the No Build Area. This separation, between the No Build Area and the development establishes a visual break between the 'most sensitive' upper slopes and the rural lifestyle development of Shannon Farm. The proposal avoids development across the ridgeline and upper slopes of the No Build

²⁸ ENV -2021-CHC-73. Joint Witness Statement – landscape. dated: 10 December 2021. In attendance Tony Milne and Anne Steven

Area within the SAL, maintaining the high natural and open character of the upper SAL.

- 69 The Proposal provides additional lots in RLA 3, RLA 4 and RLA 6. All of RLA 6 and parts of RLA 3 and RLA 4 are within the SAL overlay. For RLA 3 and RLA 4, the effects on the SAL will be **low** and this is accepted by Ms Harshey. The proposed additional lots within RLA 3 and RLA 4 are located within the bounds of the consented development and located where development within the SAL is already anticipated.
- 70 The proposed development within RLA 6 will have **low** to **low-moderate** adverse effects on the openness and legibility of the SAL. The proposed location of the lots within RLA 6 allows for a band of open space in the form of the balance lot to be maintained between the developed area and the open, upper slopes (and more sensitive slopes) of the SAL with the No Build Area. The proposed lots will introduce additional built form and domestic activity on the lower slopes.
- 71 However, the effect is moderated by the location of the lots, the size and placement of building platforms, the controls on curtilage, the fencing controls, and the retention of the balance land as open pasture, retaining the current land use of the SAL. The additional 16 residential allotments within RLA 6 will read as a cohesive and coherent periphery to the wider Shannon Farm development.
- 72 Development within the SAL has already been consented (RC220396) including 22 entire residential allotments across the Shannon Farm development²⁹ within various Rural Living Areas, signifying that a level of development is deemed acceptable within this SAL. Therefore, the addition of 16 residential allotments on the uphill side of the road within RLA 6 does not result in a fundamental change to the SAL nor its associated amenity values.
- 73 In my opinion, the Proposal maintains the key SAL values of openness, rural character, visual coherence, and legibility at the broader landscape scale. At the Site scale the proposal, particularly RLA 6 will represent a small but coherent extension of residential development into the SAL. When considering the mitigation measures and the existing development already consented within the SAL, the proposed development would have a **low** to **low-moderate** effect on the values of the SAL overall.

²⁹ As illustrated on Sheet 11 of the GA

Effects on Ripponvale Road and the Wider Basin

- 74 There is no change proposed to the area immediately adjoining Ripponvale Road. Views from Ripponvale Road will continue to be of the consented Shannon Farm development, including the Rural Lifestyle Production Areas and the planting framework required under the CODP and structure plan. In my opinion, adverse effects on the landscape character and quality of the Ripponvale Road area will be **no to very low**.
- 75 From the wider Cromwell Basin, the proposed RLA 6 development will be visible in some views. However, it will be seen as a coherent extension of the Shannon Farm development edge rather than as a separate intrusion into the SAL. The proposal is separated from the Pisa Range ONL by the 'Northen Ridge'³⁰. This landform serves as both a visual and physical break and buffer between proposal and the ONL. The Proposal will have no indirect effects on the ONL, nor will the proposal result in any reduction in legibility of the ONL.
- 76 In my opinion, the Proposal will not fundamentally change the character of the receiving environment.

Landscape and Visual Effects Conclusion

- 77 In my opinion, the Proposal represents a carefully located and controlled intensification of the consented Shannon Farm development. The additional lots within RLA 3 and RLA 4 will be largely internalised within the established development pattern and will result in **no to very low** adverse landscape and visual effects. The proposed development within RLA 6 will introduce additional built form and domestic activity onto the lower slopes of the SAL. However, the development has been deliberately confined to the lower part of the slope, adjacent to Road 001 and wider Shannon Farm development. It avoids the ONL, the No Build Area, and the upper slopes, while retaining a substantial balance area as open pasture.
- 78 The controls on building platforms, curtilage, fencing and planting will prevent the development from presenting as a conventional suburban extension. Instead, the RLA 6 lots will form a controlled and coherent edge to Shannon Farm, while the upper and more visually prominent parts of the SAL remain open, legible and free of built development. From the wider Cromwell Basin, the Proposal will be viewed in the context of the consented Shannon Farm development and the established rural lifestyle and productive landscape pattern of the basin floor.

³⁰ As illustrated on Sheet 11 of the GA.

- 79 At the Site scale, the Proposal will result in a coherent encroachment of residential development into the SAL. At the broader landscape scale, however, it will maintain the SAL's key values of openness, rural character, visual coherence and legibility. The Proposal will not fundamentally change the character or values of the receiving environment.

Response to Matters Raised in the Landscape Peer Review and S42A Report

- 80 I have reviewed the landscape peer review prepared by Ms Harshey on behalf of the CODC. I have also reviewed the Officers report prepared by **Mr Oli Monthule-McIntosh**, consultant planner for CODC. Mr Monthule-McIntosh has essentially adopted Ms Harshey's position. I find that surprising given the errors within Ms Harshey's report³¹, which must bring into question the confidence one can have in the position she has reached.
- 81 Setting aside my concerns with Ms Harshey's report, I record that there are considerable areas of agreement between Ms Harshey and me.
- 82 In particular, Ms Harshey accepts that:
- (a) the RMM methodology is appropriate and consistent with Te Tangi a te Manu;
 - (b) the LAR provides a comprehensive and well-structured description of the receiving environment, albeit Ms Harshey suggested a more critical reflection of the cumulative effects of ongoing development in the Cromwell Basin, particularly with regard the SAL's evolving character;
 - (c) the LAR identifies the key physical, perceptual, and associative landscape values;
 - (d) RLA 3 and RLA 4 are largely internalised within the consented Shannon Farm development; and
 - (e) adverse visual effects associated with RLA 3 and RLA 4 are **no to very low**.

³¹ Of note in Ms Harshey original peer review it was stated that 'representative Cromwell township perspectives' (para 7.2) were missing from the application. However, on a subsequent Site Visit with myself, Ms Harshey confirmed that the proposal was not visible from the township, as it turns out Ms Harshey was looking at the wrong Site. In addition to this the report was unclear on whether Ms Hashey's primary concern relates dwellings in RLA 6 or the SAL, with errors when referencing policy provision departures. I have made assumption as to what Ms Harshey was referring to, these assumptions are footnoted throughout the evidence

- 83 The main point of disagreement between Ms Harshey and myself concerns the level of effects relating to RLA 6 and consistency with the CODP in respect to landscape and visual matters. I address these following;
- a. Characterisation of the RLA 6 effects
 - b. Openness and Screening
 - c. Boundary delineation and domestication
 - d. Earthworks and landform
 - e. Historic water races
 - f. Compliance with Statutory Provisions – Specifically Policy 4.4.18 and the Structure Plan
- 84 Mr Monthule-McIntosh agrees with Ms Harshey and I that the landscape and visual amenity effects of the proposed intensification of RLA 3 and RLA 4 will be largely internalised, with effects being no more than minor. In terms of RLA 6 Mr Monthule-McIntosh prefers Ms Harshey's assessment, noting concerns for the landscape structure and visual legibility that was sought to be maintained through PC 14 and the operative Structure Plan.
- 85 Furthermore, Mr Monthule-McIntosh assesses the effects of Rural Character, noting 'the scale of departure from the anticipated lot size framework in those areas [RLA 3 RLA 4 and RLA6] remains relevant to the overall rural character assessment³²'. Mr Monthule-McIntosh states that this departure will 'weaken the distinction' within the subdivision and will contribute to a more 'intensive and homogenous rural lifestyle pattern than that anticipated by the Structure Plan'.
- 86 In addition to the matters, I address from Ms Hashey's Peer Review I will address the following (additional) matters raised by Mr Monthule-McIntosh;
- a. whether it is sufficient to rely on the same controls / mitigation measures as PC14 to address development beyond what was anticipated by PC14
 - b. Cumulative effects of nighttime lighting, particularly in the RLA 6 area
 - c. Effects on Rural Character.

³² Page 18 of the Section 42 A Report prepared by Oli Monthule-McIntosh on behalf of the Central Otago District Council

Characterisation of the RLA 6 Effects

- 87 Ms Harshey considers that the proposed RLA 6 lots will create a continuous domestic edge³³ that undermines the Structure Plan framework and erodes the intended landscape outcome for RLA 6 to maintain the open natural character and legibility of RLA 6. Having re-read Ms Harshey's report several times, it is unclear if she is primarily concerned with effects on the SAL and/or material departure from RLA 6 policy. Given there are no policy directions that relate to the SAL it is assumed that Ms Harshey's main concern is the departure from the structure plan with development of the RLA 6. Mr McIntosh is in agreement with Ms Harshey on this matter.
- 88 I do not agree with that characterisation for the following reasons.
- 89 In my opinion, the proposed RLA 6 lots will not be an unconstrained or separate band of development. It will instead be a coherent extension of Shannon Farm, one that from a landscape and visual perspective is understood to be closely associated with the Road 001 alignment and the adjacent consented development.
- 90 While I agree it will result in a shift of the domestic edge, this shift of at the most approximately 45m³⁴ will be marginal when considered at both a Site and receiving environment landscape scale.
- 91 The Proposal does not extend development onto the upper slopes instead keeping the extent of development adjacent to the consented subdivision. It does not enter, and retains separation from, the ONL and No Build Area, and furthermore it will not introduce buildings across the full extent of RLA 6. In addition to this, the majority of the RLA 6 land, an area of 36.0 ha, will retain its open natural character and legible landform. That open land (being the upper extent of RLA 6 with the No Build Area and its periphery) is what I consider to be the more recognisable SAL land within the Site. The Proposal will continue to provide a visual and spatial separation between the developed lower slopes and basin and the upper, open slopes above.
- 92 In my opinion, the RLA 6 development edge is limited and controlled. While it will alter a small part of RLA 6 the majority of the RLA 6 land will remain as is.

³³ Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. para 8.5

³⁴ The 'back' of the building platforms are between approximately 25 – 45m with from Road 001 with the 'back' or up slope boundary of the proposed lots between approximately 60-100m from Road 001. The landscape change and area for domestication will be limited to the building platforms as per the building and landscaping controls for RRA (5)

Openness and Screening

- 93 Ms Harshey states that screening³⁵ does not substitute for spatial openness³⁶.
- 94 I agree with that principle. However, the RMM assessment does not rely on screening as a substitute for openness. The mitigation approach is based on absorption, location, and landform response, together with controls that avoid overt boundary delineation and suburban curtilage spread.
- 95 The relevant point is that the upper slopes remain open. The balance lot remains open. The building platforms and curtilage activities are confined. Furthermore, internal boundary planting is avoided and there are conditions in place that will result in fencing remaining rural in character.
- 96 In my opinion, those measures maintain spatial openness where it matters most, while allowing a controlled level of rural lifestyle development at the lower edge of Shannon Farm.
- 97 Mr Monthule-McIntosh states the that

‘the proposal includes mitigation measures, including limitations on building platform size, restrictions on fencing, and planting controls required under Schedule 19.25 and the Shannon Farm Design Guidelines. These measures would assist in managing the detailed visual effects of future development. However, I do not consider that they adequately mitigate the more fundamental change in development pattern proposed.

Importantly, these controls were developed as part of the Structure Plan framework established through PC14 and were intended to manage the visual effects of development within the spatial pattern anticipated by that Structure Plan.

- 98 Whilst I agree that design conditions are already required within RRA (5), I disagree that these will be insufficient to mitigate the ‘fundamental’ change. As stated by Mr Monthule-McIntosh these measures have been designed

³⁵ The proposal does not rely on particular screening, for example mitigation planting. It is assumed that when Ms Harshey discusses screening, she is referring to our reliance on the consented development precluding views of (parts) of the proposal. This is an important differentiation, as our assessment is reliant on the pattern and presence of the existing development rather than ‘screening’. The proposal will not be isolated strip of development in an otherwise rural landscape that in another situation may (hypothetically) be screened by vegetation. The proposal will be an incremental intensification and coherent extension of development, some of which will be indiscernible from the consented pattern of development.

³⁶ Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. Dated 24 February 2026. Para 10.6

and included to manage the visual effects; that is because they are effective in doing so. While I acknowledge there will be a fundamental change in land use, as is with the case for all greenfield development, I maintain that the potential visual effects of this change will be, at most, **low-moderate**.

- 99 This is because the proposed development within RLA 6 will be a coherent encroachment, that will be located adjacent to the constructed road, forming a backdrop to the already consented development. Together with careful consideration of the location of development in RLA 6, the mitigation measures will assist in ensuring that a sense of openness and visual transition will be maintained between the developed area of Shannon Farm, the upper extents of undeveloped RLA 6 and the No Build Area above.

Boundary delineation and domestication

- 100 Ms Harshey is concerned about cumulative domestication and boundary delineation. I accept that any residential subdivision has the potential to introduce domestic elements. In this case, that potential is directly addressed by the applicable controls.
- 101 Internal and rear boundaries are restricted to post-and-wire fencing. Curtilage activities are contained within the building platforms. Planting is to be naturalised and is not to be used to mark internal lot boundaries in a formal or linear way.
- 102 These controls are targeted at the precise effects that Ms Harshey is concerned about. In my opinion, they are sufficient to avoid an overly domestic or suburban appearance on the SAL.
- 103 Furthermore, the existing domestic delineation between the development and the open and undeveloped SAL is Road 001. This is hard boundary when compared to the softer and more variable edge of the potential allotments. This softer boundary delineation will be provided for through the aforementioned design controls.
- 104 The presence of additional development will result in **low** cumulative domestication effects due to the constrained nature of the Proposal. If we consider the addition of 17 lots within the RLA 6 against the broader basin scale as Ms Harshey suggests, the magnitude of the potential cumulative effect diminishes rather than increases. The proposed development within RLA 6 will have **no** effects on the legibility of the ONL at the Cromwell Basin

scale³⁷. The broader scale one considers this change in the less consequential it becomes.

Earthworks and landform

- 105 Ms Harshey raises concern that the RMM LAR has minimised potential earthworks volumes required to create the building platforms within RLA 6 and have underplayed the potential subsequent effects³⁸. I agree that this was not addressed in the LAR as the information was not available at the time when the resource consent was lodged. Following lodgement, in August 2025, the council requested further information for detailed earthworks information.
- 106 Earthworks need to be carefully managed in within the proposal area. Earthworks modelling is relied on to understand the extent of earthworks required to establish the building platforms on the additional lots. It is my understanding that the proposal will include additional³⁹ earthworks of up to 293,679m³ over an area of 132,553m². Cuts will be up to a maximum of 3.1 metres in depth, while fill will be up to 2.1 metres in height. The cut and fill will be variable across RLA 3, RLA 4, and RLA 6, dependent on existing ground levels and access requirements.
- 107 It is important to understand that these earthworks required for the formation of the Building Platforms and access (One road - being an upgrade of an existing Right of Way, and two new Right of Ways), are being undertaken in the context of consented earthworks undertaken (and still to happen) across the whole Shannon Farm Development. The proposed earthworks will occur proximate to the road and other building platforms and establishment earthworks.
- 108 From a landscape perspective, there are three main issues to consider in this context. First are the construction and the temporary effects of earthworks. The second is the enduring change to the legibility of the landform and the third is the final visible landform outcome and whether building platforms, access, and associated curtilage can be integrated without creating prominent scarring or engineered benching that may be visually inappropriate in this setting.

³⁷ Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. Dated 24 February 2026. Para 9.13

³⁸ Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. Dated 24 February 2026. Para 9.20

³⁹ On top of the 269,000m³ earthworks already consented under RC220396

- 109 Within RLA 3 and RLA 4 the earthworks required to establish the additional residential allotments will have **very low to low** adverse effects. This is due to the small and incremental degree of change this proposal will have on the earthworks already anticipated and consented within these areas. There will be no perceptible change on the legibility of the landform, with the visual landform outcome anticipated to be in keeping with what has been consented.
- 110 Earthworks within RLA 6 have the potential to be more contentious due to the SAL overlay, and the policy direction to maintain the legible, open natural character of RLA 6. Whilst I acknowledge earthworks will, by definition, effect the landform, I don't believe it will to a degree that is unacceptable.
- 111 The proposed RLA 6 lots are located within the lower (and less sensitive) slopes of the RLA 6 and are adjacent to Road 001. They avoid the upper slopes and No Build Area within the SAL overlay on the Site. The scale of building platforms is limited, with curtilage activities confined to the building platforms.
- 112 The lower, roadside extent of earthworks within RLA 6 will not be readily perceptible as they will occur behind the consented development, which is anticipated to include dwellings, accessory buildings, fences, street trees, and planting. The consented development will both screen the earthworks from view as well as being undertaken in the context of a developed and modified environment. The applicant is not seeking to undertake earthworks in an isolated rural environment but rather as an extension of the already modified environment.
- 113 Furthermore, given the folded nature of the landform, the localised areas of future earthworks will be partly screened by the same topography when viewed from beyond the Site. It is anticipated, following best practice, that localised areas of excavation and fill will be contoured to blend into the natural topography and once planted will blend in with the immediate surroundings.
- 114 The upper slopes of the RLA 6, identified as the 'balance lot' will not require any earthworks and therefore there will be no effect from earthworks on the legibility of the landform of the upper extent of RLA 6.
- 115 In my opinion, the avoidance and mitigation of adverse effects arising from earthworks can be achieved through detailed design and the proposed conditions of consent (as attached to the evidence of Mr Woodward).

Rural Character

- 116 I agree with Mr Monthule-McIntosh that the relevant baseline is the anticipated rural lifestyle character of Rural Resource Area (5), rather than the pastoral character that existed before Plan Change 14. I also agree that the Structure Plan establishes a graduated development pattern across Shannon Farm. Where I differ is in the conclusion that the proposal would produce a more homogeneous development pattern and significant adverse rural character effects.
- 117 In landscape terms, rural character is not determined by allotment size or numerical compliance with the Structure Plan alone. Lot size is relevant, but the character that will be perceived depends on the physical expression of subdivision and development, including the location of buildings, retained open space, vegetation, fencing, curtilage, all of which are attributes subject to the Shannon Farm design controls. A departure from the prescribed allotment sizes does not necessarily result in an equivalent degree of change to rural character or rural amenity values.
- 118 In RLA 3 and RLA 4, the additional lots are located within areas already anticipated and consented for rural lifestyle development. The change is internalised within Shannon Farm and occupy the less visually prominent central terraces and lower slopes. The Rural Lifestyle Production Area, horticultural land, open-space network, amenity edges, shelterbelts and areas of RLA 3 and RLA 4 outside the Proposal area but within the Shannon Farm Site all remain unchanged and will continue to contribute to the rural amenity values of the receiving environment.
- 119 Mr Monthule-McIntosh considers that the purpose of RLA 6 is to provide spatial relief and a transition between the lower developed extents of Shannon Farm and the open upper slopes. I accept that RLA 6 is located on the periphery of Shannon Farm and therefore plays a role in transitioning the land use and landcover between residential development and the open, legible natural character of the upper SAL. This role as a transitional landscape is maintained through the proposed design controls that will maintain a degree of openness. Furthermore, the proposal does not seek to develop RLA 6 in its entirety or extend residential activity over the upper and most sensitive slopes, as identified through the PC 14 process as the No Build Area.
- 120 A balance area of approximately 36 ha will remain in its current state and will provide a visual buffer of undeveloped land between the Proposal and the No Build Area. The bulk of the upper slopes will therefore continue to

be open, legible and free of built development maintaining its rural character attributes and rural amenity values.

- 121 I also disagree that the proposed mitigation is limited to managing visibility. The controls will influence the character and pattern of development itself. Building platforms and domestic curtilage will be confined to areas of no more than 1,000 m²; internal and rear boundaries are restricted to rural post-and-wire fencing; planting must be naturalised and must avoid formal or linear patterns along internal boundaries; and future buildings remain subject to the applicable height, colour, reflectivity and design controls. These measures will limit the spread of domestic activity and avoid the strongly delineated lot boundaries, continuous garden planting and suburban enclosure that could otherwise make the subdivision pattern conspicuous.
- 122 I agree with Mr Monthule-McIntosh that internal views and experiences within Shannon Farm form part of the receiving environment. From within the Shannon Farm, the additional lots will be apparent. However, the character the proposed additional lots will not be dependent on their size alone. Shannon Farm has design controls, above and beyond the typical requirements of the CODP, these design controls will ensure a contiguous pattern of development and high-quality design outcome, resulting in a high amenity development and a desirable place to live. The internal character of Shannon Farm will be more strongly influenced by the attributes of development (beyond lot size), including planting, house design, fencing and the relationship between built form. This proposal does not seek to amend any of these design controls.
- 123 Overall, the proposal will not result in a homogeneous rural lifestyle development, but rather a coherent subdivision development with additional opportunities for high amenity living. Furthermore, there are no changes proposed to the open-space network and amenity planting areas, Rural Productive Lifestyle Area, No Build Area, or upper slopes with the RLA 6 balance land, all of which continue to provide meaningful variation and spatial relief. It is my opinion that the rural character and rural amenity values of Shannon Farm will be maintained.
- 124 I disagree with Mr Monthule-McIntosh's conclusion that the proposal will fundamentally alter the spatial balance established through PC14 or result in significant adverse rural character effects.
- 125 The adverse effects on rural character in RLA 3 and RLA 4 will be **very low** to **low**, noting that Ms Harshey is broadly in agreement with the conclusions reached for RLA 3 and RLA 4. With the adverse effects on rural character

in RLA 6 will be **low-moderate**. Overall, the proposal will remain consistent with the broad intent of the Shannon Farm Structure Plan and will not fundamentally degrade the rural character and rural amenity values of Rural Resource Area (5).

Cumulative effects of night time lighting

- 126 I am in agreement with Mr Woodward that nighttime effects, are not relevant in the context of the SAL⁴⁰. The landscape values of the SAL are attributed to the legibility of the landform, in order for these landscape values to be perceived they must be visible, therefore these values are not perceptible at night.
- 127 Notwithstanding the natural reduction of the perceptual landscape values when its dark, the potential cumulative effects of nighttime lighting will be **very low**. The additional 44 allotments will increase the number of potential light sources within Shannon Farm. However, the proposal does not seek any change to the existing lighting standards applying to the RRA (5), and future development will remain subject to the CODP and Shannon Farm Design Guidelines. The lighting will occur within and immediately adjoining the consented rural lifestyle development pattern, rather than extending into the upper slopes, No Build Area or ONL.
- 128 Furthermore, Road 001 already has lighting consented, therefore the proposed residential allotments within RLA 6 will be a coherent extension of lighting on the lower slopes. Additionally, and as already mentioned there are lighting controls within the CODP that restrict exterior lighting. External lighting will only occur within the building platform and curtilage area of the 17 allotments within RLA 6.
- 129 Given the landscape context the proposal will result in a marginal increase in night-time lighting. Accordingly, the cumulative adverse landscape and visual effects of night-time lighting will be **very-low to low**.

Historic Water Races

- 130 Ms Harshey raises the need to confirm protection of the historic water race during construction. The historic/remnant water races are shown on Sheet 9 of the GA⁴¹, however, this application does not affect the races. The water

⁴⁰ Evidence of Jake Woodward – Planner. Para 44

⁴¹ The location of the remnant water races are included in the GA on Sheet 9 as requested by Mr Monthule-McIntosh. Page 24

races are located beyond the extent of the proposal (but within the Shannon Farm Site), with the exception of a water race in RLA 4.

- 131 As stated, there are existing works consented and constructed, with stage 2 anticipated to begin later in 2026. Within the existing consent there is no requirement to protect the water races.
- 132 Construction of Road 006 and the access ways and platforms on the consented allotments will remove much of the existing race formation. The proposed additional 44 lots will not change this outcome. The proposed allotments located within RLA 6 will not impact any historic water race formations.

Compliance with Statutory Provisions – Specifically Policy 4.4.18 and the Structure Plan

- 133 While Ms Harshey is in general agreement with the magnitude of visual effects of the proposed RLA 6 development⁴², she disagrees about the degree of effect on the SAL.
- 134 I understand Ms Harshey's assessment to rest on her belief that the RLA 6 component fails to maintain the open and natural character and legibility of the SAL overlay on RLA 6. Ms Harshey opines that the proposed development of RLA 6 is considered to fail the PC14/Structure Plan intent and is a material departure from Policy 4.4.18(n)⁴³, producing more-than-minor effects on the SAL.
- 135 In my opinion I have covered this off within my evidence, so to avoid duplication provide some further succinct comments. From a landscape and visual perspective I list the following relevant limbs of policy 4.4.18:

To provide for rural lifestyle subdivision and development while avoiding, remedying or mitigating adverse effects on the environment by:

- a. Requiring subdivision and development to be undertaken in general accordance with the Structure Plan in Schedule 19.23;
- b. Integrating a range of complementary activities within the rural setting, including:
 - Rural living
 - Farming and agriculture

⁴² Boffa Miskell Limited 2026. *Landscape Peer Review: Shannon Farm*, Report prepared by Boffa Miskell Limited for Central Otago District Council. Dated 24 February 2026. Para 7.13 and 10.5

⁴³ In my opinion Ms Harshey has referenced the wrong policy limb in her report, as the references limb relates to the Rural Lifestyle Production Area which is not the subject of this Application.

- Horticulture
- Recreation and Open Space

- d. Ensuring that subdivision is designed to:
 - i. facilitate convenient, safe, efficient and easy access for vehicles, pedestrians and cyclists; and
 - ii. facilitate the safe and efficient operation and the economic provision of roading and network utility services to secure an appropriate, integrated and planned development; and
 - iii. have regard to the natural landform in Rural Lifestyle Areas 1-6, including through the alignment of lot boundaries and roading, and landscaping and planting design within public spaces;
- f. Encouraging the extent of earthworks to not exceed that required for the installation of services, access and building platforms, while recognising that the contouring of land may either be required for, or limited by, geotechnical and/or aesthetic considerations;
- g. Managing the character and amenity values of the Rural Resource Area (5) and surrounding areas by controlling land use activities, avoiding building within the no build areas shown on the Structure Plan, and avoiding urban forms of subdivision and development;
- h. Minimising adverse effects of built form resulting from inappropriate building scale, location and external appearance;
- i. Enhancing landscape values through the implementation of planting schemes tailored to specific areas within the Rural Resource Area (5);
- j. Providing for an efficient access and open space network;
- m. Managing the potential for reverse sensitivity effects on adjoining rural land uses;
- p. Complementing, rather than competing with, urban areas in the district by providing a focus on rural living activities.
- q. Maintaining the open and natural character and legibility of Rural Lifestyle Area 6 by:
 - i. Avoiding subdivision and building in the No Build Area;

- ii. Enabling building within the "Area for Future Building Platform" provided it is well integrated into the landscape;
- iii. Other than as provided in ii, avoiding building in the area outside of the No Build Area unless it be demonstrated that the legibility and open and natural character of the Rural Lifestyle Area 6 will be maintained;
- iv. Avoiding subdivision in the area outside of the No Build Area unless:
 - a. the creation of additional lots is necessary to facilitate rural activity or ecological restoration and use of the land is restricted to such purpose in perpetuity through a legal mechanism; or
 - b. a dwelling has been approved under Rule 4.7.4.xi on each of the lots proposed to be created; and
 - c. in respect of a and b the subdivision will avoid adverse effects on, and maintain, the legibility and open and natural character of the Rural Lifestyle Area 6 and will not result in delineation of boundaries through fencing or planting.
- v. Requiring that any planting is natural in design and avoids any linear or geometric forms and comprises only native species endemic to the area except for low height producing grass species such as browntop;
- vi. Requiring that any roads are largely enclosed by planting.

136 In considering the differences between Ms Harshey and the RMM LAR in respect to the policy direction of the CODP, I draw the Commissioners attention to the purpose and intent as expressed through Objective 4.3.10 of the RRA (5).

137 The Structure Plan and RRA (5) framework provide for rural lifestyle development as part of an integrated landscape response at Shannon Farm.

138 There are a large number of limbs in the above policy which are relevant to landscape, visual and character effects. The majority of these are met by

the application⁴⁴. I acknowledge the Proposal does not accord with a limited number of specific limbs of this Policy.

- 139 Both Ms Harshey and Mr Monthule-McIntosh consider the proposal to be a material departure from 4.4.18 (a) which requires subdivision and development to be in general accordance with the Structure Plan⁴⁵, I disagree with this conclusion.
- 140 The Structure Plan in Schedule 19.23 provides for the growth of rural lifestyle development within Rural Resource Area (5) in an integrated, sustainable and planned manner. The Structure Plan enables development that will respect the unique characteristics of the area and the surrounding environment by identifying areas capable of absorbing a range of densities of rural lifestyle development commensurate to the landscape values of the area⁴⁶
- 141 In my view the proposed additional residential allotments will meet the overarching purpose of the structure plan by providing a well-integrated development that respects the unique characteristics of the area. The proposal will not be incongruous with the surrounding landscape nor will it give rise to unacceptable adverse effects on the identified landscape values of the surrounding area.
- 142 The proposal will be inconsistent with Policy 4.4.18(c) However, from a landscape and visual perspective, it is my opinion that the proposal remains consistent with the policy intent. The purpose of the minimum and average allotment areas is to respond to the landscape values of the SAL, situate denser development within the core of the Site and enable the continued use of the productive soils on the southern part of the Site⁴⁷. I am of the opinion that the revised subdivision layout continues to align with the aim and intent of 4.4.18 (c).
- 143 Turning my attention to Policy 4.4.18(q) I am still firmly of the opinion that the landscape values that PC14 sought to protect remain protected, and

⁴⁴ CODP 4.4.18 limbs met b, d, e, g, h, i, j, m, p

⁴⁵ CODP 19.23

⁴⁶ CODP 4.4.18 Explanation

⁴⁷ CODP 4.4.18 Explanation: minimum and average allotments sizes; 'The areas capable of having smaller lots and denser rural living [development](#) are on the flat and less visibly prominent core of the zone. Larger lots are located on the outer edges of the zone, responding to the landscape values within the Significant Amenity Landscape and enabling use of the soils in the southern part of the zone for productive land uses. A No Build Area and designated area within RLA6 for locating future [buildings](#) ensures that [development](#) on the most highly visible areas valued for their open and legible character is avoided, while enabling [development](#) in the least sensitive area, and providing for potential [development](#) of the balance only where it is possible to maintain landscape values.'

despite the additional density, the proposal maintains the legibility, natural character and open space values that the Structure Plan sought to achieve.

- 144 The policy direction as it related to built form within RLA 6 primarily relates to maintaining the open and natural character of RLA 6⁴⁸ by avoiding built form in the No Build Area⁴⁹, enabling built form in the 'Area for Future Building Platform' provided it is well integrated in the landscape⁵⁰. Other than as provided in ii, avoiding building in the area outside of the No Build Area unless it be demonstrated that the legibility and open and natural character of the Rural Lifestyle Area 6 will be maintained⁵¹. This policy does not direct that all built form is inappropriate in this landscape but rather it should be carefully considered and designed as to enable the maintenance of the legible, open and natural character of the RLA 6. In my opinion this has been appropriately addressed in the context of the subdivision application but will also be considered through subsequent applications for the buildings.
- 145 Importantly, despite inconsistency with certain policy limbs as identified above, I consider the Proposal achieves the overall intent of Objective 4.3.10 because it continues to provide for rural living opportunities integrated with productive land and open space and avoids development within the Outstanding Natural Landscape and No Build Area.
- 146 The Proposal remains within the Shannon Farm development structure, avoids the most sensitive areas, retains a large open balance lot, and utilises the same design and landscape controls that apply to RRA (5). The RLA 6 lots are not scattered across the slope and therefore do not impinge on or erode the key SAL values identified within RLA 6. They are grouped along the lower edge, adjacent to the consented road. That is a logical and legible location if additional rural lifestyle lots are to be provided within RLA 6.
- 147 The Proposal results in RLA6 remaining largely undeveloped. In turn this maintains a sense of openness within the key elevated slopes of RLA 6 as well as achieving a continuation of a visual transition between the more intensively developed lower areas and the open upper slopes. In my view, the Proposal does not disregard the framework established by the relevant objective and policies.

⁴⁸ CODP 4.4.18.q

⁴⁹ CODP 4.4.18.q.i met

⁵⁰ CODP 4.4.18..ii

⁵¹ CODP 4.4.18.q.iii

Conclusion

- 148 The Proposal will increase the density of residential allotments within parts of RLA 3 and RLA 4 and introduce additional allotments to RLA 6 at Shannon Farm.
- 149 The effects associated with RLA 3 and RLA 4 are demonstrated to be **no** to **very low**. Those areas are internalised within the consented Shannon Farm development and will not materially alter the perceived landscape character of the Site or receiving environment. There is agreement between Council's landscape architect Ms Harshey and me that the increase in density with RLA3 and RLA 4 is acceptable from a landscape and visual perspective.
- 150 RLA 6 is more sensitive because it contains those areas of the SAL that contribute to the identified values of the SAL within the Site. These values are more recognisable within the elevated area of the eastern basin of the Site which for the most part RLA 6 encompasses. I acknowledge that the proposed RLA 6 lots will increase domestication on the lower slopes. However, I consider the RLA 6 effects to be **low** to **low-moderate**, and not unacceptable.
- 151 The proposed RLA 6 residential allotments avoid the ONL, the No Build Area, the upper slopes, remain proximate to the consented road, and maintain a 36.0 ha area of open pasture that results in the natural character and legible landform landscape values attributed to the SAL to remain. The proposed lots are subject to the same controls as Shannon Farm / RRA (5) including building controls, curtilage activities as well as restrictions on fencing, and planting, which will achieve the outcomes sought by the RRA (5) framework.
- 152 In my opinion, the Proposal will maintain the openness and legibility of the broader SAL and the relationship between the Cromwell Basin floor, the lower foothills, and the Pisa Range ONL.
- 153 I therefore remain of the opinion that the Proposal can be appropriately integrated into the receiving environment, and that adverse landscape and visual effects will be no more than minor.

Dated this 23 July 2026

Tony Douglas Milne



Shannon Farm Proposed Intensification of Lots
Graphic Attachment to Landscape Evidence of Tony Douglas Milne

24 July 2026

Document Information

Project		
Shannon Farm, Additional 44 Lots		
Address		
Shannon Farm, Ripponvale Road, Cromwell		
Client		
New Zealand Cherry Corp (Leyser) Limited Partnership		
Document		
Graphic Attachment to Landscape Evidence of Tony Douglas Milne		
Status		
For Evidence		
Revision		
For Evidence	24.07.2026	
Prepared By		
Rough Milne Mitchell Landscape Architects Ltd		
Project Number: 24196		
Author: Emily-Rose Dunn and Courtney Prebble		
Peer Reviewed: Tony Milne		

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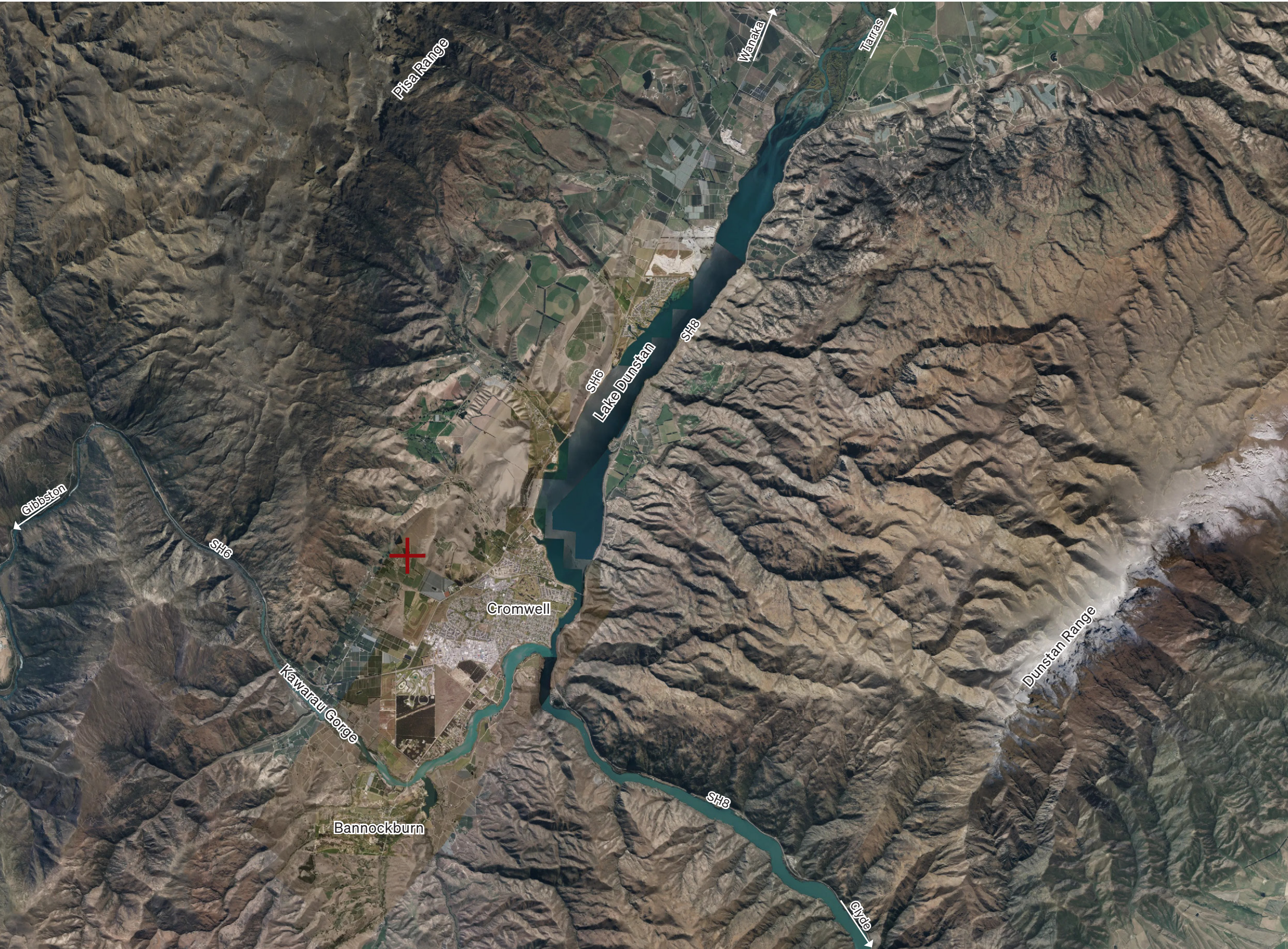
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Note
Pages 8, 9, 26, 27 and 28 are additional to the pages the to Graphic Attachment (GA) provided for the Resource Consent Application. The additional pages are in response to the queries and clarification sought by the Peer Review and the S42a Report. This GA also includes supplementary information that was included as part of the PC 14 proceedings to provide relevant context to the this application.

Context Aerial

Legend

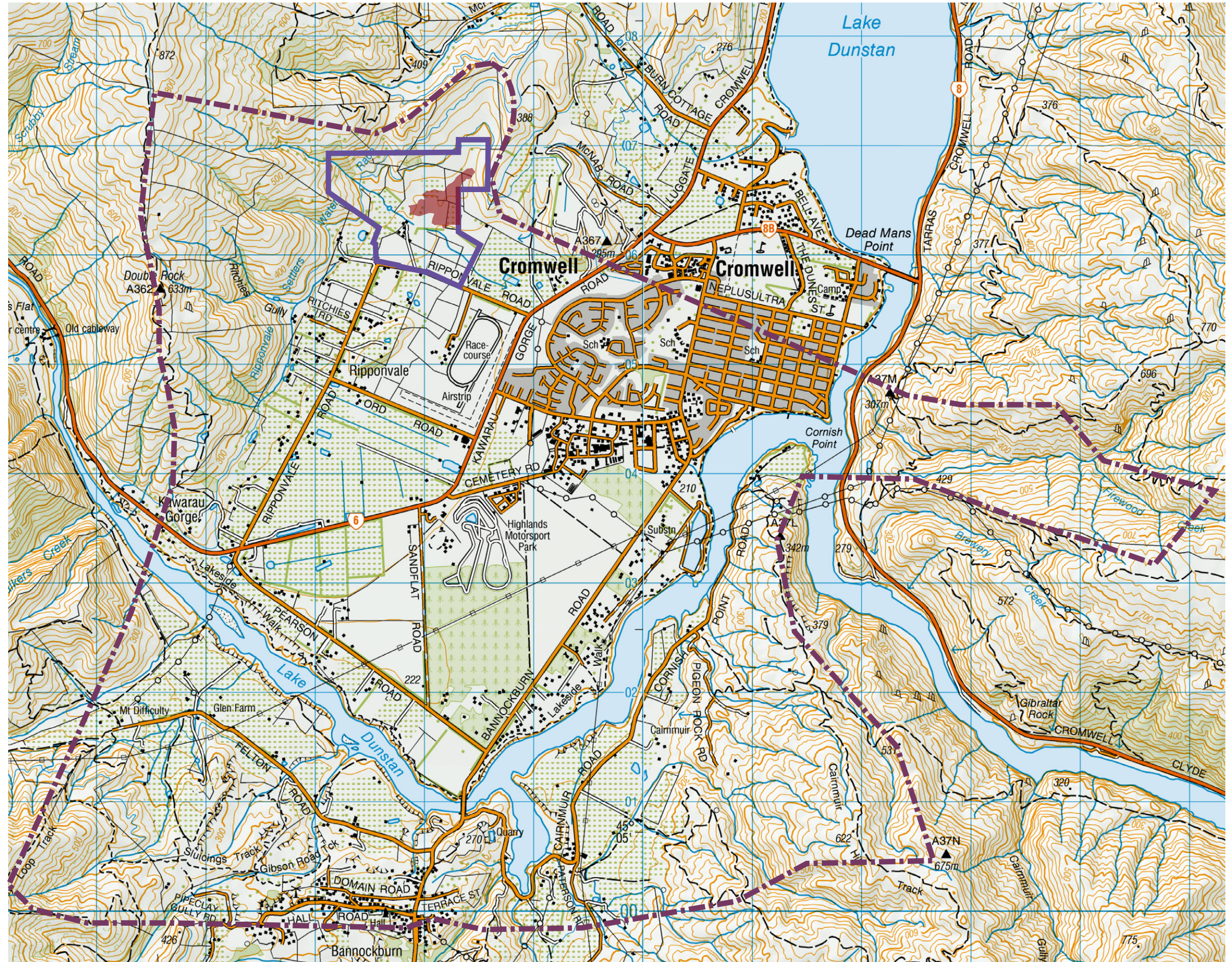
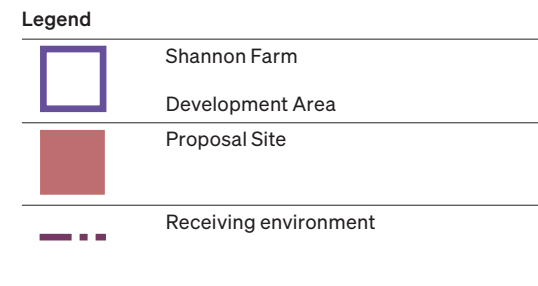
Application Site



Scale: 1:100,000@ A3

Source: app.grip.co.nz

Receiving Environment



Scale: not to scale

Source: topomap.co.nz

Site Location Plan

Legend

Shannon Farm

Development Area

Proposal Site

(44 additional Lots)

An aerial photograph of a rural landscape with a network of roads and a river. A purple outline delineates the 'Shannon Farm' area, which includes a larger 'Development Area' and a specific 'Proposal Site' highlighted in red. The map shows 'Kawarau Gorge Road' on the left, 'State Highway 6' running diagonally, and 'State Highway 8' on the right. Other roads labeled include 'Hearney Road', 'Burn Cottage Road', 'Dunlop Road', 'Ord Road', 'Pearson Road', 'Fulton Road', 'Cairnmuir Road', 'Luggate-Cron', and 'Gromwell-Clyde Road'. The terrain is hilly and brownish, with some green patches of vegetation.

Scale: 1:50,000@ A3

RMM

Shannon Farm

New Zealand Cherry Corp (Leyser) Limited Partnership

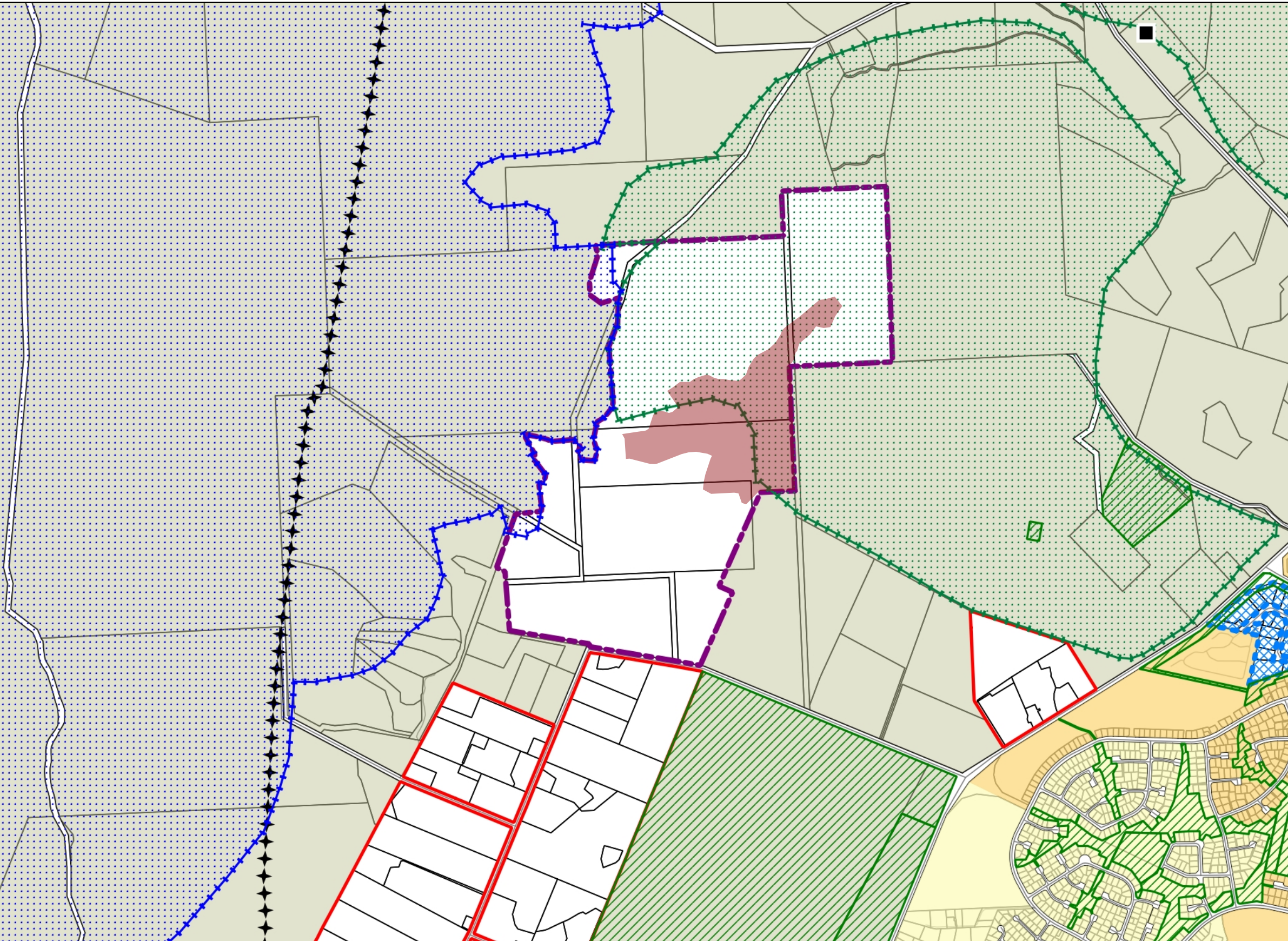
05

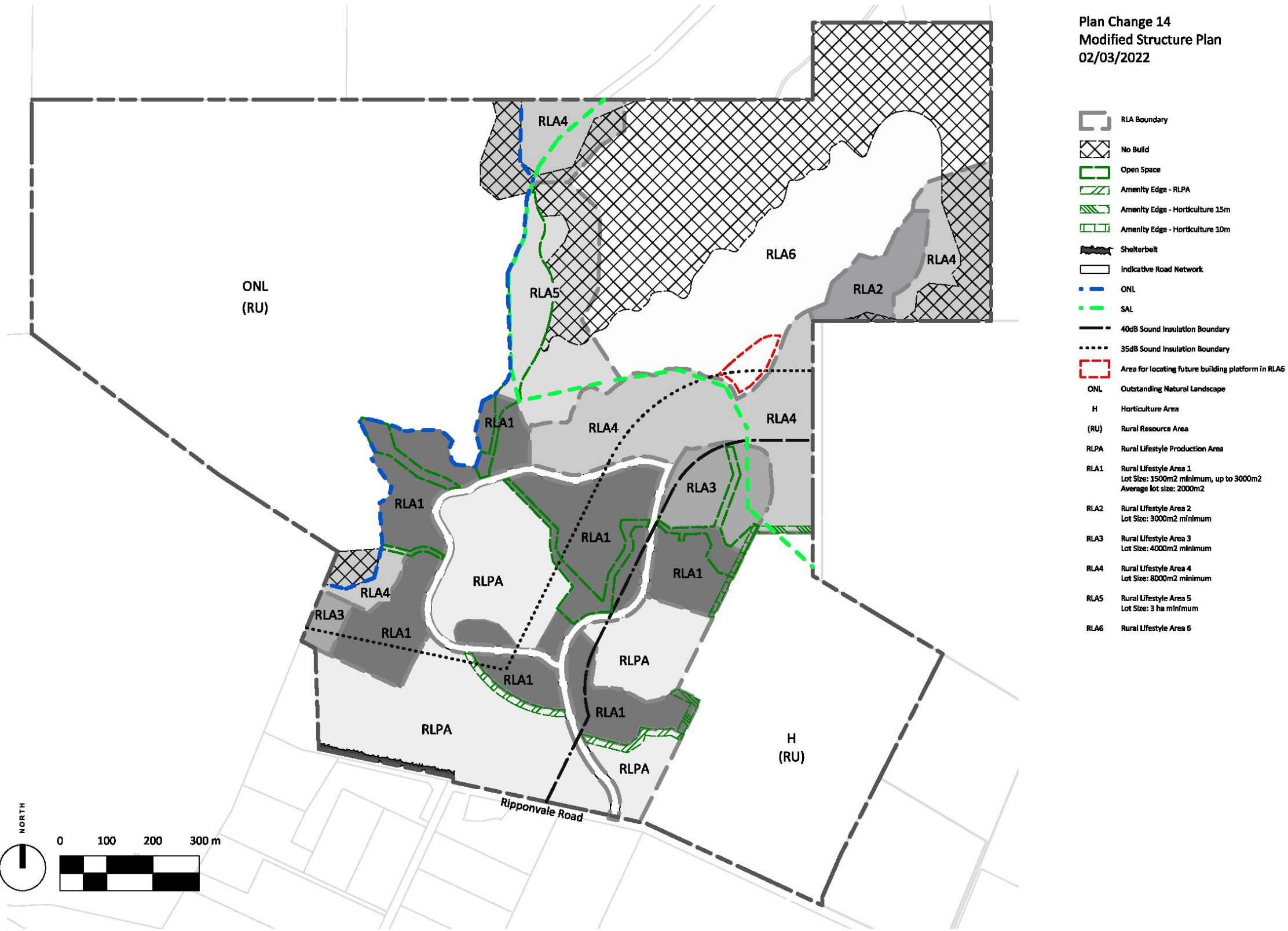
- Scheduled Activities
- Designations
- PC 19 Appeals
- FG - Low Density
- FG - Medium Density
- Large Lot
- Large Lot (P1)
- Low Density
- Medium Density
- Rural Resource
- Future Growth
- Dark Sky Precinct
- Heritage Values
 - Additional Wetlands
 - Nohoanga
 - Notable Trees
 - Heritage Buildings
 - Heritage Precinct
 - Historic Reserve
 - Esplanade Provision
 - Land Management Area
 - Outstanding Natural Features
 - Outstanding Natural Landscape
 - Significant Amenity Landscape
 - Significant Natural Value
- Hazards
 - ActiveFaults
 - High Voltage Lines
 - Flood Prone
 - Filled Area
 - Mined Area
 - Subsidence or Slippage
- Resource Areas
 - Business Area
 - Business Area 1-2
 - Industrial Area
 - New Residential
 - FG - Large Lot
 - FG - Large Lot (P2)
 - FG - Low Density
 - FG - Medium Density
 - Large Lot
 - Large Lot (P1)
 - Large Lot (P2)
 - Large Lot (P3)
 - Low Density
 - Medium Density
 - Medium Density (P1)
 - Residential Area
 - Residential Resource Area
 - Rural Residential Area
 - Rural Settlement Area
 - Rural Resource Area 1-5
 - Rural Resource Area
 - Water Resource Area
- Property
- Aerial Photos
- Rural 2019 (50km)
- Roads
- Places
- Rivers
- Core Layers
- TLAs
- CODC
- Surrounding Councils

Legend

Proposal Site

(44 additional Lots)



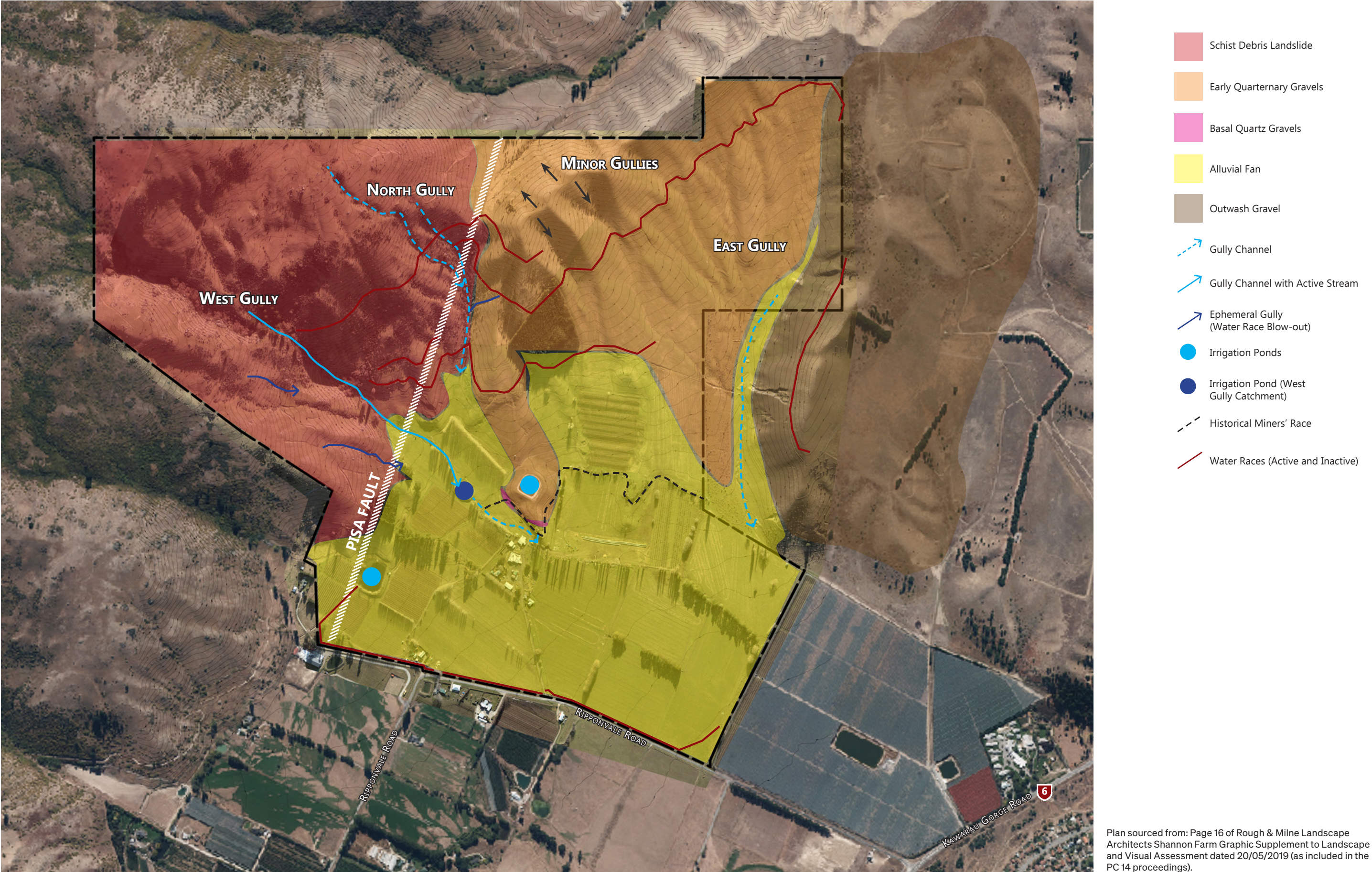


Existing Site Photos

Existing photos showing constructed road 001 and the proposed RLA6 building platform locations

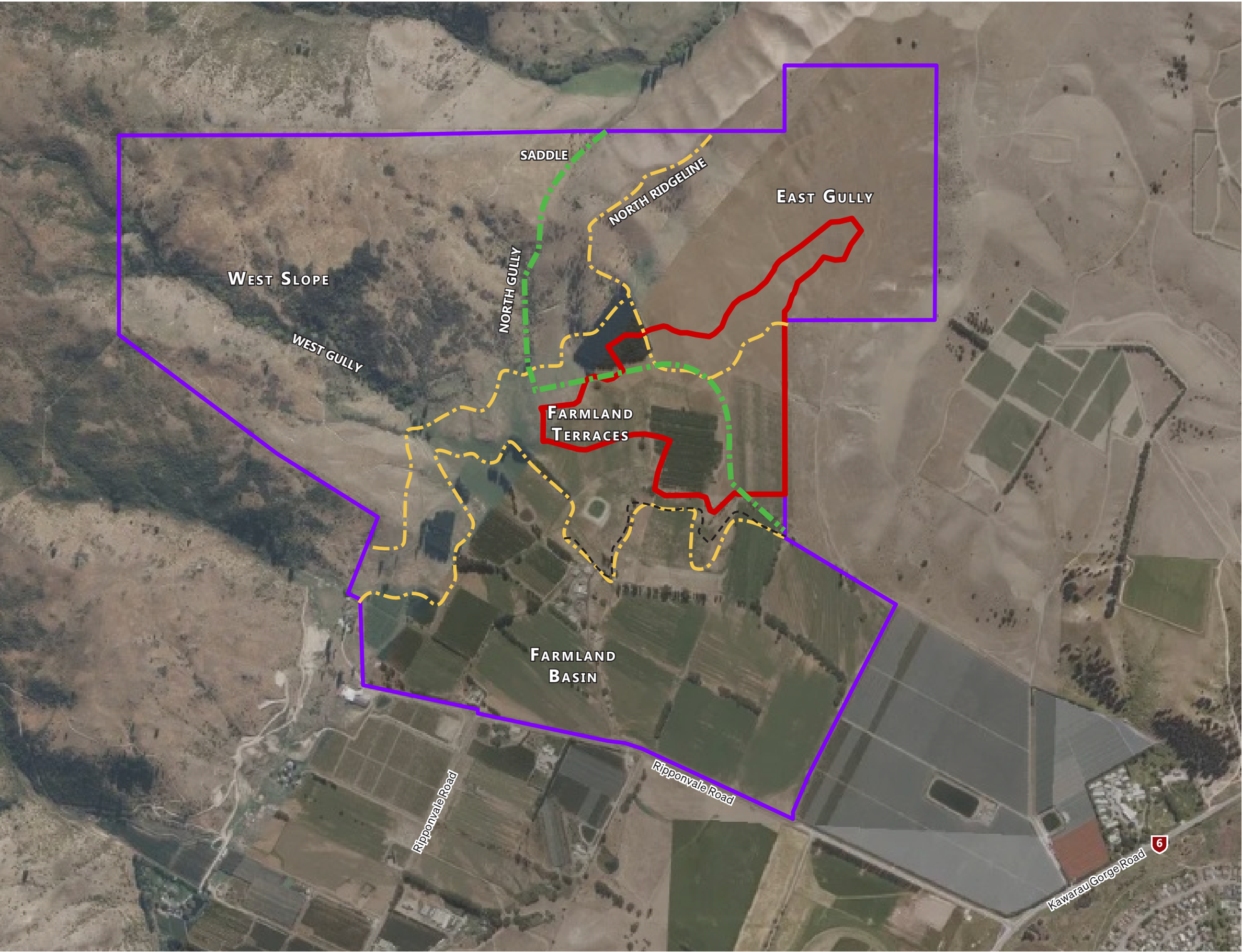
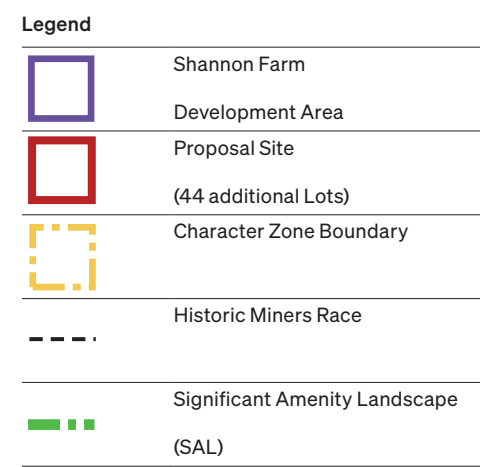


Site Geology & Topographical Features Plan



Plan sourced from: Page 16 of Rough & Milne Landscape Architects Shannon Farm Graphic Supplement to Landscape and Visual Assessment dated 20/05/2019 (as included in the PC 14 proceedings).

Site Character Zones



Consented Subdivision Plan - Shannon Farm

Legend

Shannon Farm

Development Area

Proposal Site

Significant Amenity Landscape (SAL)

RLA 1

RLA 2

RLA 3

RLA 4

RLA 5

RLA 6

Reserves and Green Links

RLPA Amenity Edge

Horticulture 15m Amenity Edge

Horticulture 10m Amenity Edge

Scale: 1:7,500@ A3

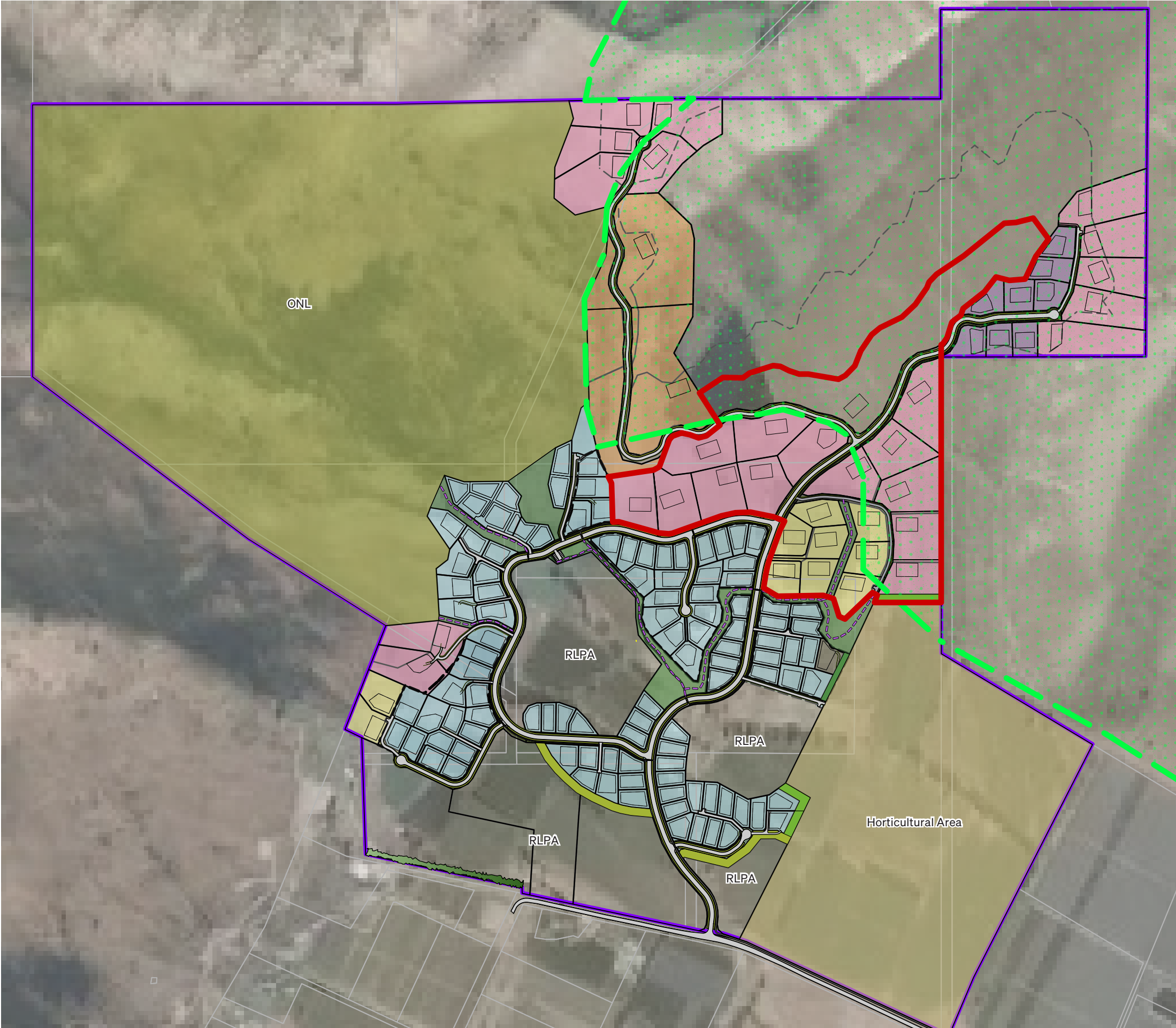
0

50

100

200

500m



Proposed Plan

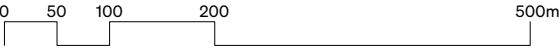
Intensification of Lots

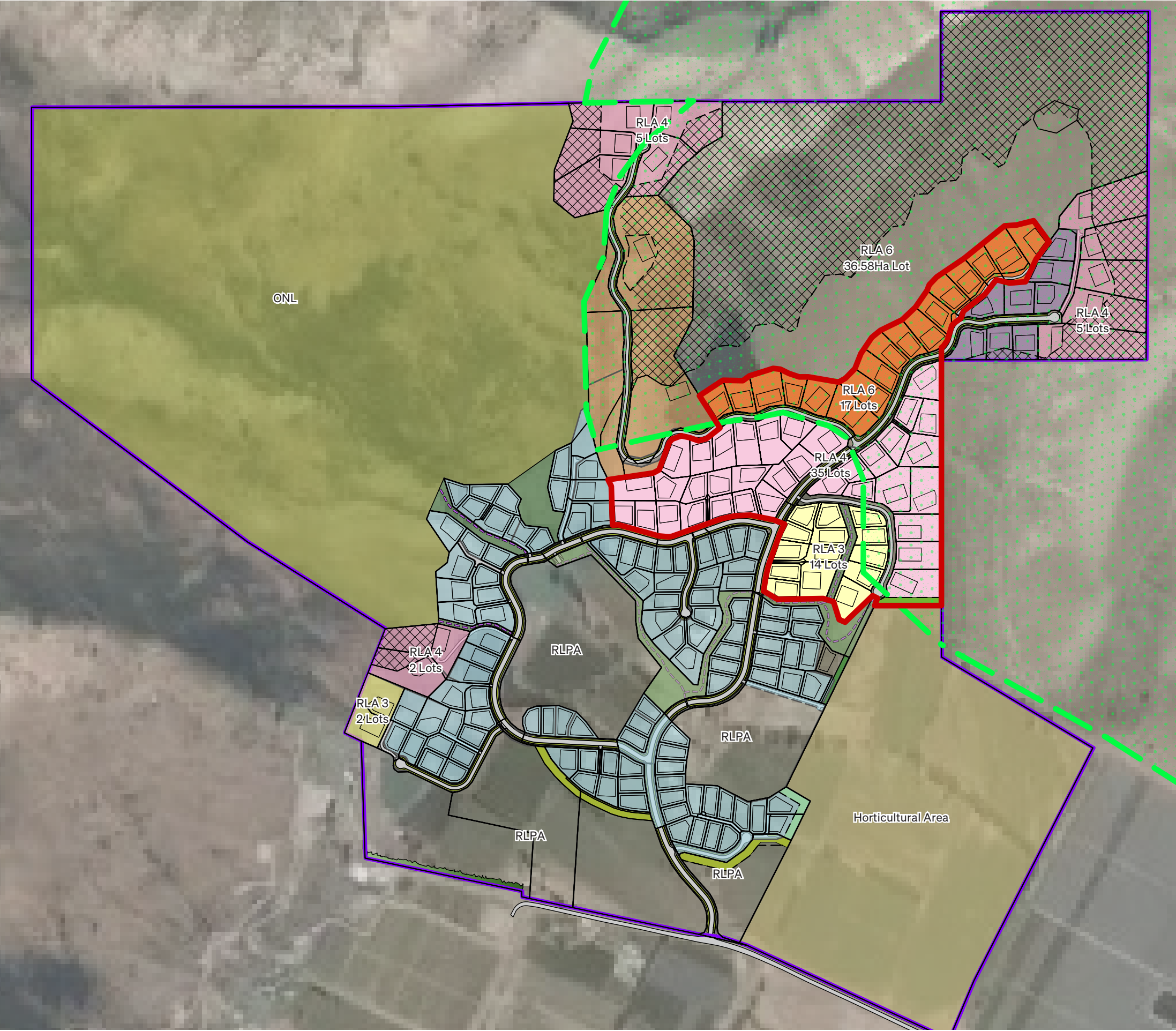
Legend

	Shannon Farm
	Development Area
	Proposal Site
	(44 additional Lots)
	Significant Amenity Landscape (SAL)
	RLA 1
	RLA 2
	RLA 3
	six additional allotments
	RLA 4
	22 additional allotments
	RLA 5
	RLA 6
	16 additional allotments
	Reserves and Green Links
	RLPA Amenity Edge
	Horticulture 15m Amenity Edge
	Horticulture 10m Amenity Edge
	No Build Area



Scale: 1:7,500@ A3





Proposed Plan

Structure Plan Overlay

Legend

Shannon Farm

Development Area

Proposal Site

RLPA - Rural Lifestyle Production Area

RLA1 - Rural Lifestyle Area 1

Lot Size: 1500m2 minimum, up to 3000m2

Average Lot Size: 2000m2

RLA2 - Rural Lifestyle Area 2

Lot Size: 3000m2

RLA3 - Rural Lifestyle Area 3

Lot Size: 4000m2

RLA4 - Rural Lifestyle Area 4

Lot Size: 8000m2

RLA5 - Rural Lifestyle Area 5

Lot Size: 3ha minimum

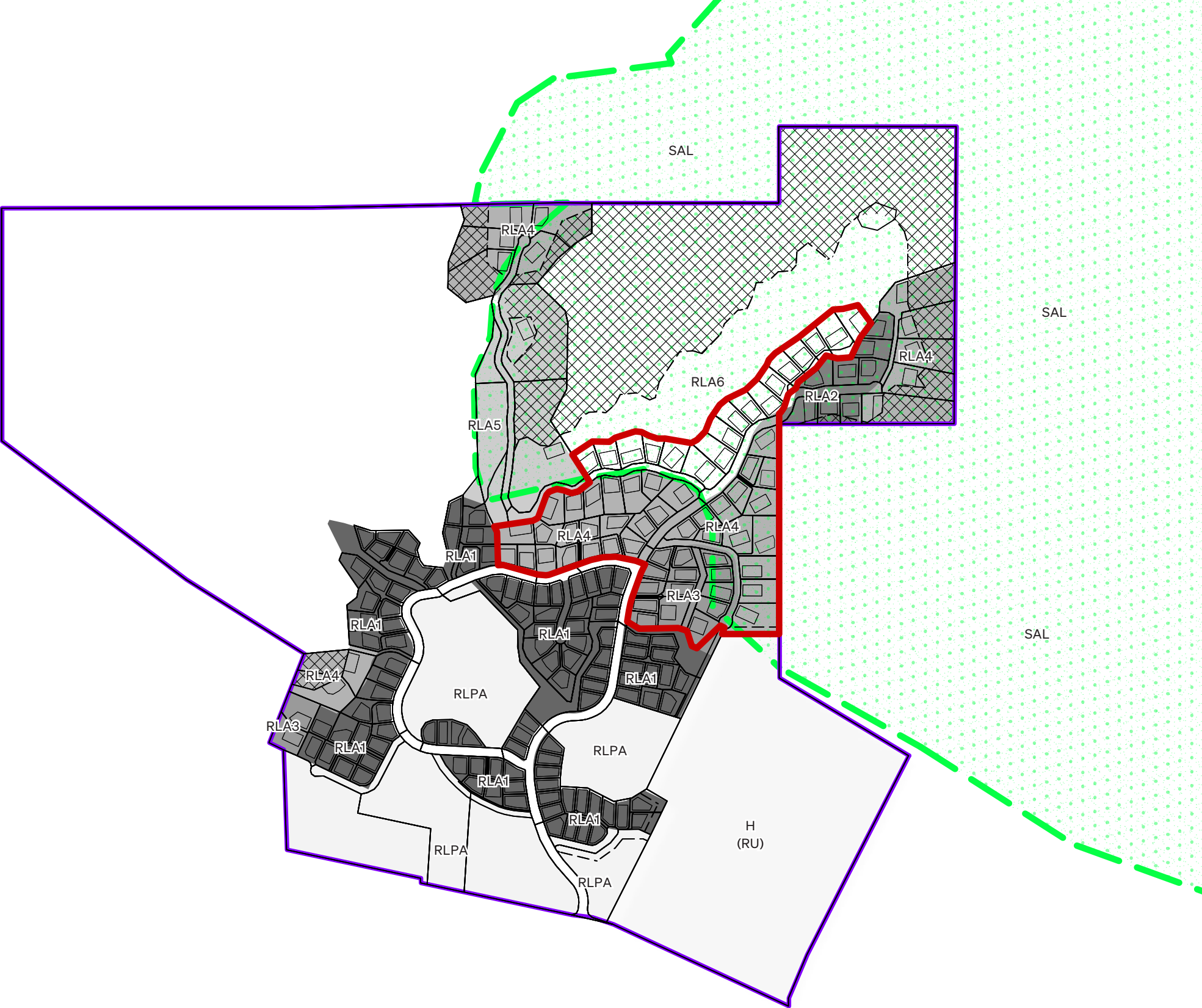
RLA6 - Rural Lifestyle Area 6

H - Horticulture Area

(RU) - Rural Resource Area

No Build Area

Significant Amenity Landscape (SAL)



Scale: 1:10,000@ A3

0

50

100

300

600m

Viewpoint Location Plan

Legend

Shannon Farm

Development Area

Proposal Site

Viewpoint Location

Scale: 1:50,000@ A3

RMM

Shannon Farm

New Zealand Cherry Corp (Leyser) Limited Partnership

14

Representative Viewpoints



Viewpoint 1. From the driveway of 64 Ripponvale Road looking north-west towards the Site at a distance of 450m from Shannon Farm entrance and 800m from the proposal Site.
Distance: 800m
Date: 27-02-2025
Time: between 11am - 1pm



Viewpoint 2: Entry to Shannon farm Subdivision. Looking north towards the proposal Site at a distance of (approximately) 645m from RLA 3, 730m from RLA 4, and 980m from RLA 6.
Distance: 640m
Date: 27-02-2025
Time: between 11am - 1pm

Representative Viewpoints



Viewpoint 3. From the driveway of 144 Ripponvale Road looking north-west towards the Site at a distance of 270m from Shannon Farm Entrance and approximately 720m from the proposal Site.
Distance: 700m
Date: 27-02-2025
Time: between 11am - 1pm



Viewpoint 3a: From the driveway of 144 Ripponvale Road looking west along Ripponvale Road towards the Site at a distance of 270m from Shannon Farm Entrance and approximately 720m from the proposal Site.
Distance: 640m
Date: 27-02-2025
Time: between 11am - 1pm

Representative Viewpoints



Viewpoint 4. From the driveway of 184 Ripponvale Road looking nor-west towards the Site at a distance of 400m from Shannon Farm Subdivision and approximately 1km from the proposal Site.
Distance: 1km
Date: 27-02-2025
Time: between 11am - 1pm



Viewpoint 5: From Cromwell Racecourse driveway looking nor-west towards the Site at a distance of 670m from Shannon Farm Subdivision and approximately 1.2km from the proposal Site.
Distance: 1.2km
Date: 27-02-2025
Time: between 11am - 1pm

Representative Viewpoints



Viewpoint 5a: From Cromwell Racecourse driveway looking nor-west towards the Site at a distance of 630m from Shannon Farm Subdivision and approximately 1.1km from the proposal Site.
Distance: 1.1km
Date: 27-02-2025
Time: between 11am - 1pm



Viewpoint 6: From McNulty Road, SH6 intersection looking west at a distance of 1.8km from the proposal Site.
Distance: 1.8km
Date: 27-02-2025
Time: between 11am - 1pm

Representative Viewpoints



Viewpoint 7: From 3 Ord Road looking west at a distance of 2.1km from the proposal Site.
Distance: 2.1km
Date: 27-02-2025
Time: between 11am - 1pm

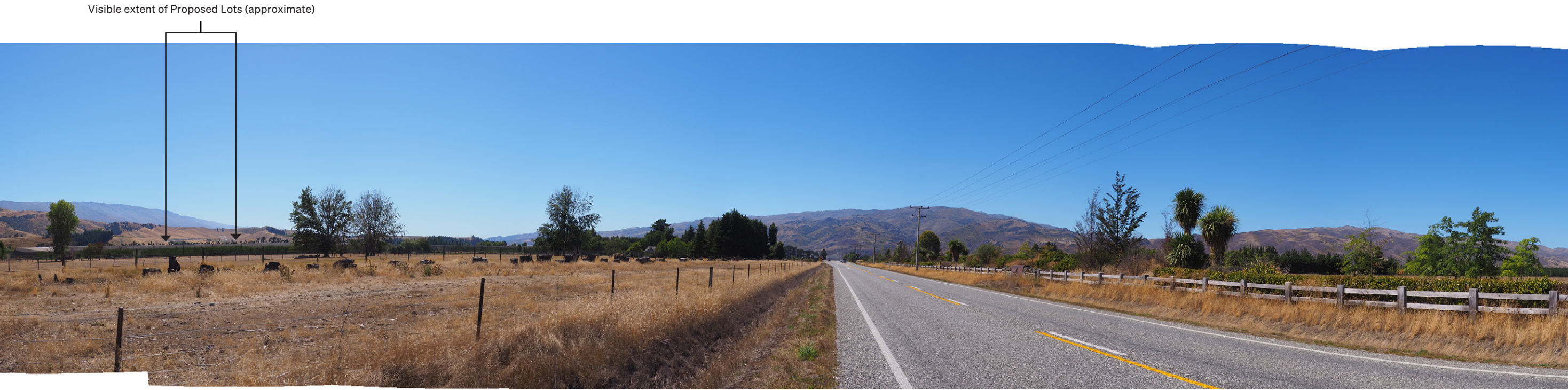


Viewpoint 8: From Ord Road (650m from intersection with SH6) looking west at a distance of 1.9km from the proposal Site.
Distance: 1.9km
Date: 27-02-2025
Time: between 11am - 1pm

Representative Viewpoints



Viewpoint 9: From 422 Ripponvale Road looking nor-west along Ripponvale Road at a distance of 3.5km from the proposal Site.
Distance: 3.5km
Date: 27-02-2025
Time: between 11am - 1pm



Viewpoint 10: From SH6 (350m west from intersection with Sandflat Road) looking nor-east at a distance of 3km from the proposal Site.
Distance: 3km
Date: 27-02-2025
Time: between 11am - 1pm

Representative Viewpoints



Viewpoint 11: From Bannockburn Road (50m north of Panners Cove Lane) looking nor-east at a distance of 4km from the proposal Site.
Distance: 4km
Date: 27-02-2025
Time: between 1pm - 3pm



Viewpoint 12: From the intersection of Bannockburn Road and Hall Road, looking north at a distance of 6.5km from the proposal Site.
Distance: 6.5km
Date: 27-02-2025
Time: between 1pm - 3pm

Representative Viewpoints

Visible extent of Proposed Lots (approximate)



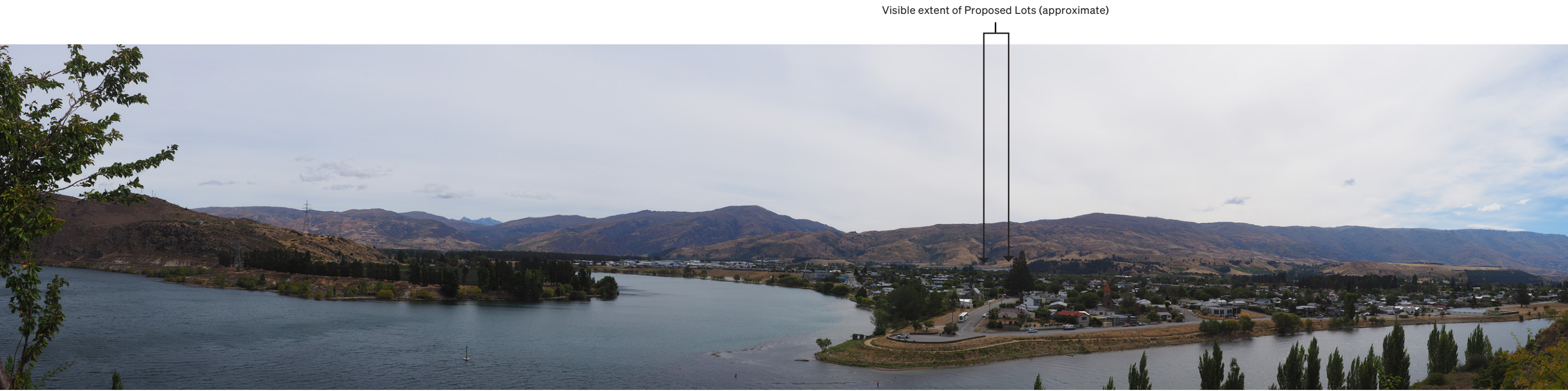
Viewpoint 13: From Start of Bannockburn Sluicings track, on Felton Road looking nor-east at a distance of 5.4km from the proposal Site.
Distance: 5.4km
Date: 27-02-2025
Time: between 1pm - 3pm

Visible extent of Proposed Lots (approximate)



Viewpoint 14: From the driveway of 264 Felton Road looking east at a distance of 5.2km from the proposal Site.
Distance: 5.2km
Date: 27-02-2025
Time: between 1pm - 3pm

Representative Viewpoints



Viewpoint 15: From The Bruce Jackson Lookout on SH8 looking west at a distance of 4.1km from the proposal Site.
Distance: 4.1km
Date: 27-02-2025
Time: between 3pm - 4pm

Indicative Development Overlay



Indicative development overlay from Viewpoint 2. Area shown in purple represents the consented Shannon Farm Subdivision, the are shown in red represents the area for proposed intensification
Source: RMM and Google Earth Pro

Indicative Development Overlay



Indicative Development Overlay from Viewpoint 6. Area shown in purple represents the consented Shannon Farm Subdivision, the are shown in red represents the area for proposed intensification
Source: RMM and Google Earth Pro

PC 14 Structure Plan

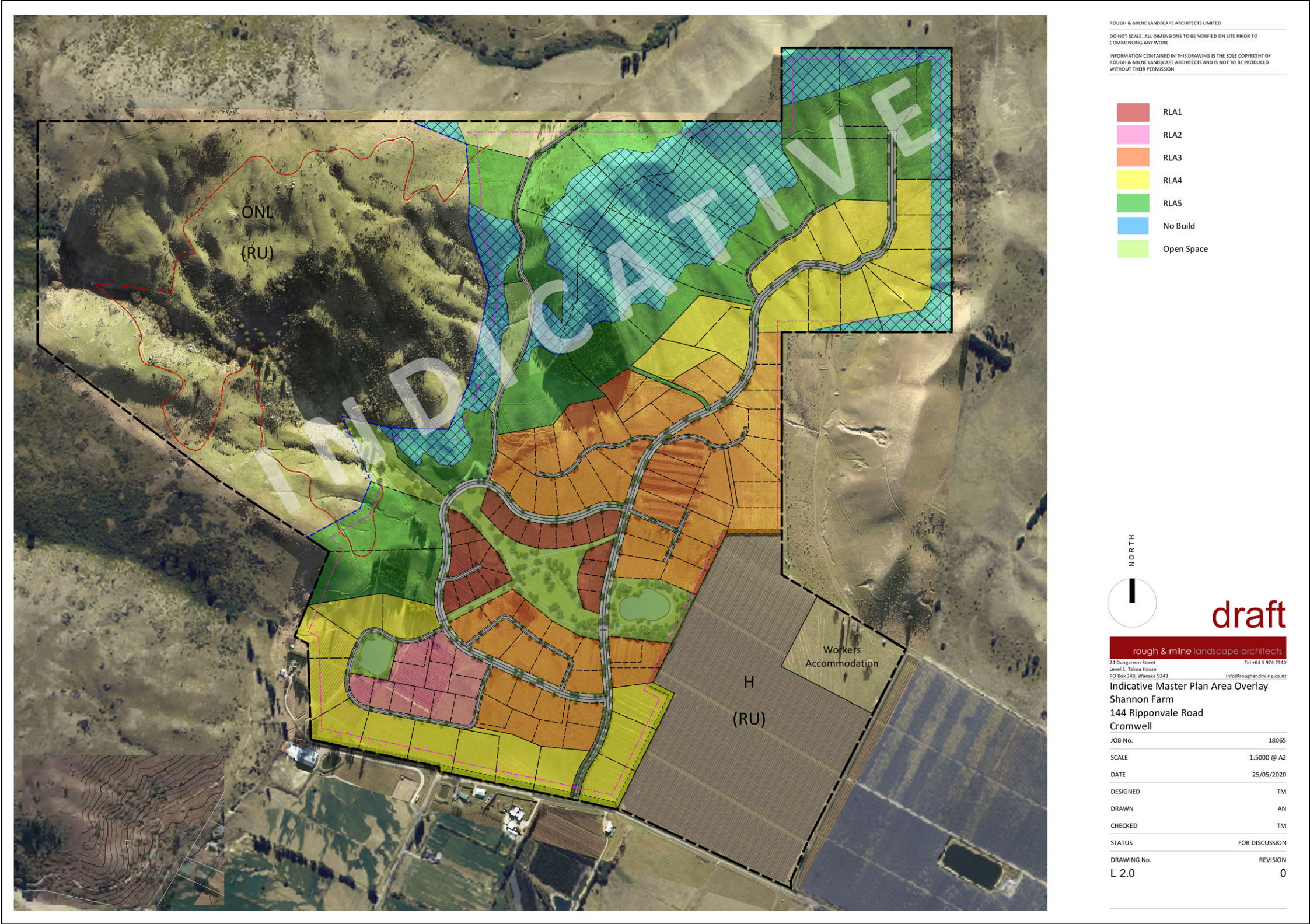
Tabled for PC 14 hearing and assessed by Ben Espie



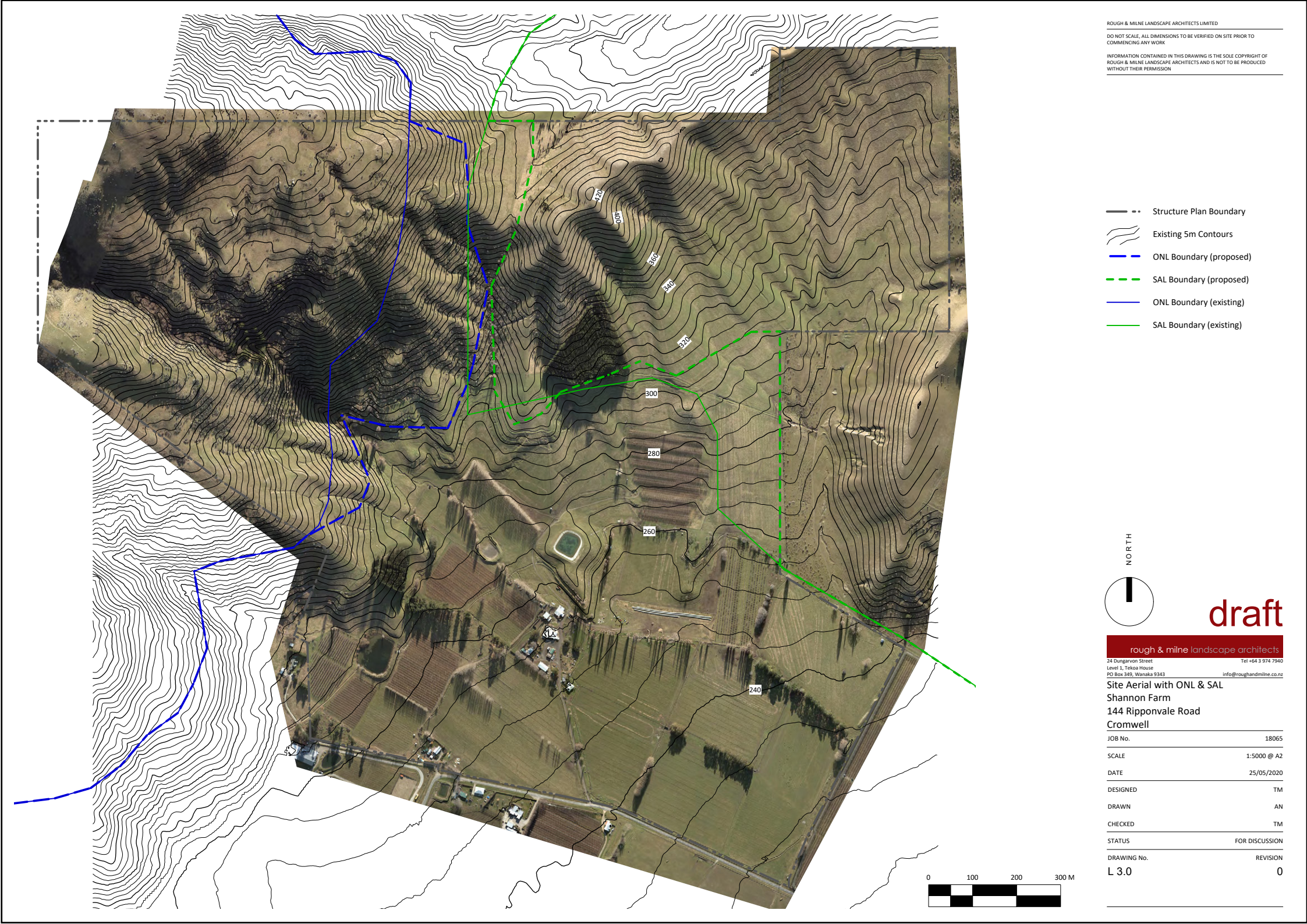
Plan sourced from: Page 18 of Rough & Milne Landscape Architects Shannon Farm Graphic Supplement to Landscape and Visual Assessment dated 20/05/2019 (as included in the PC 14 proceedings).

Shannon Farm Masterplan

Assessed by Ben Espie



Site Aerial with ONL & SAL



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