

**BEFORE THE PANEL APPOINTED ON BEHALF OF
CENTRAL OTAGO DISTRICT COUNCIL**

Under	The Resource Management Act 1991 (the Act)
In the Matter	of an Application for a Land Use Consent to construct a dwelling, shed and vehicle access in the Rural Resource Area and Outstanding Natural Landscape (RM250353)
Between	ANDREW WALSH DUNCAN AND JESSE CHALMERS Applicant
And	CENTRAL OTAGO DISTRICT COUNCIL Local Authority

BRIEF OF EVIDENCE OF STEPHEN RUSSELL SKELTON

LANDSCAPE

DATED 27 JULY 2026



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QUALIFICATIONS AND EXPERIENCE

1. My name is Stephen Russell Skelton. I am the Director of Patch Limited (Patch), a landscape architecture consultancy based in Queenstown.
2. I hold the qualifications of a Bachelor of Arts in Communication from Northern Arizona University and a Master of Landscape Architecture (First Class Honours) from Lincoln University. I have been a registered member of the New Zealand Institute of Landscape Architects (NZILA) since 2015.
3. I have been involved in landscape consultancy work in the Queenstown Lakes and Central Otago districts for 13 years, working in both the public and private sectors. I previously held the position of Landscape Planner with Lakes Environmental before it was absorbed by the Queenstown Lakes District Council. I subsequently held the position of Landscape Architect at another landscape architecture practice in Queenstown.
4. I founded Patch in 2016, and our work includes all aspects of landscape architecture and landscape planning across a range of small and large-scale projects. My work involves master planning, residential and commercial landscape design, the preparation of native restoration planting plans, landscape management plans, and landscape assessments for resource consent applications.
5. I prepared the Landscape Assessment Report dated 13 November 2025 (the Patch Assessment) that accompanied this application on behalf of Andrew Duncan and Jesse Chalmers, and I have prepared this brief of evidence in relation to that assessment and the proposed development at 528D Kawarau Gorge Road.

CODE OF CONDUCT

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

SCOPE OF EVIDENCE

7. The topics covered in my evidence are as follows:
- (a) background and involvement;
 - (b) assessment methodology;
 - (c) summary of the proposal;
 - (d) the site and surrounding landscape;
 - (e) summary of my landscape assessment and conclusions;
 - (f) the updated cross-sections and design response;
 - (g) response to the peer review of Ms Sue McManaway of Boffa Miskell dated 8 July 2026; and
 - (h) conclusion.

BACKGROUND AND INVOLVEMENT

8. I was engaged by the applicant in May 2025 to provide landscape architecture and landscape planning advice in relation to the proposed development.
9. I assisted in the preparation of the landscape plans and provided advice on building location, and mitigation measures, including recommendations on access track treatment, cladding and roofing colours, solar panel location and landscape strategies to integrate the built form with the surrounding landscape.
10. I visited the site on two occasions during May and June 2025. During these visits I inspected the subject site and the surrounding landscape, undertook photographic documentation from within the site and from key public viewpoints across the Cromwell Basin, and oversaw the erection and inspection of building-height poles at the proposed dwelling and shed locations to assist in assessing visibility.
11. My assessment identified that, notwithstanding the careful siting and design of the proposal, a moderate adverse effect on the open and natural character of the Development Site and its immediate setting could not be fully avoided or mitigated. In response to that finding, I recommended the preparation and implementation of a Landscape Management Plan (LMP) as an enhancement measure, committing the wider 202ha property to wilding conifer eradication, indigenous planting, and pest and predator control so that the residual effect on natural character would be counterbalanced by an enduring enhancement of the same landscape values. That recommendation is reflected in the Patch Assessment and in the volunteered conditions.
12. I prepared the Patch Assessment dated 13 November 2025 that accompanied the application. Following the Council's request for further information, I prepared updated landscape plans and cross-

sections dated 4 June 2026, which included two design responses arising from that process: the incorporation of low-flammability species into the planting nearest the dwelling, and the addition of an area of mounding south of the shed to provide further screening from distant views. I describe the cross-sections and the mounding response later in my evidence.

ASSESSMENT METHODOLOGY

13. My assessment has been undertaken in accordance with the methodology set out in the Patch Assessment. This approach reflects best practice landscape and visual assessment, and is guided by *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines* (NZILA, 2022).
14. Consistent with that guidance, I have approached landscape as a composite of physical, perceptual, and associative values. In assessing the effects of the proposal, I have described and analysed the relevant landscape at three scales: the Development Site, the Subject Area (being the east-facing southern slopes of the Pisa Range), and the wider regional landscape context. This allows the effects of the proposal to be understood within the landscape in which they are best experienced.
15. As part of my assessment, I reviewed the potential visibility of the proposal from the surrounding landscape, including from a range of representative public and private viewpoints across the Cromwell Basin. This review of visibility informed both my assessment of landscape and visual effects and the recommendations I made to avoid, remedy, mitigate those effects.
16. The extent of landscape and visual effects has been evaluated using the seven-point rating scale (from very low to very high) adopted in *Te Tangi a te Manu* and set out in the Patch Assessment.

THE PROPOSAL

17. The application seeks resource consent to establish residential activity and construct a dwelling, shed, and associated infrastructure and access on the subject site at 528D Kawarau Gorge Road. The site comprises an approximately 202ha rural landholding on the eastern slopes of the Pisa Range. The key components of the proposal are described below and the full details are set out in the Assessment of Environmental Effects (AEE) and accompanying plans.

18. **Dwelling:** The proposed dwelling is a single-storey building with an L-shaped form, comprising five bedrooms and a guest bedroom, with a deck and balcony/verandah to the north and west elevations. It measures 28.5m along the east to west elevation, 9m along the south elevation, and 16.5m along the northern elevation. The total floor area of the house, entry and deck is in the order of 332m², with a total roofed area (including the 90m² balcony) of 444m². The dwelling has a maximum height of 5.5m, with two chimney flues projecting a further 600mm above the roof ridge. The roof and exterior walls will be finished in Colorsteel 'Karaka' (Light Reflective Value 8%) with a matte finish, selected to be highly recessive within the surrounding schist and tussock covered slopes and subservient to the landscape's natural values. Window joinery will be Karaka or a dark toned, powder coated aluminium. I note that the Patch Assessment refers to a dwelling floor area of 314m²; the correct figure is 332m² as set out in the AEE, and I adopt that figure in this evidence.

19. **Shed:** A detached shed of 162m² (18m x 9m) is proposed approximately 12m from the dwelling, designed in a typical rural style with a gable roof, up to 3.45m at the eave and 4.24m at the apex. It will be clad and roofed in Colorsteel to match the dwelling ('Karaka' with a matte finish) and used for storing vehicles and equipment to support the wider property.

20. **Curtilage:** A 2,000m² residential curtilage area is proposed to encompass all built development and associated domestic elements. All other areas of the property are to be kept free of buildings, with the exception of the solar array, which sits slightly outside the curtilage to optimise solar exposure.
21. **Ancillary elements:** On-site electricity is provided by a ground mounted solar array occupying no more than 40m² and no higher than 1.5m above existing ground level. Water will be stored in a 30,000 litre potable tank, a 30,000 litre firefighting reserve tank, and two 20,000 litre above ground rainwater tanks. All tanks will be partially buried into the landform and finished in dark earth coloured tones to reduce visibility.
22. **Access:** Access to the site is via an existing right of way onto Ripponvale Road, which will be upgraded in places. A new 4m wide compacted gravel track extends approximately 650m from the existing track to the Development Site, following the natural contours of the land at a gradient below 1:5, with shallow swales for drainage.
23. **Earthworks:** Earthworks to form the access track, dwelling platform and service trenching are estimated at approximately 405m³ of cut and 221m³ of fill. Earthworks have been designed to work with the existing topography, and excess cut material will be spread through the Development Site.
24. **Landscape mitigation and enhancement:** The proposal includes indigenous shrub and tree planting to integrate and screen the built form, together with a LMP providing for wilding conifer eradication, indigenous planting of at least 500 plants per annum on average over ten years, and pest and predator control across the wider property. The updated plans (4 June 2026) also incorporate low flammability planting nearest the dwelling and an area of mounding south of the shed, which I address later in my evidence.

25. The dwelling and associated structures will be located within a naturally contained saddle-like landform toward the centre of the wider property.
26. **Recommendations and volunteered conditions:** The recommendations made at Section 8 of the Patch Assessment, covering the preparation of the LMP, recessive finishes to all built elements including the solar array, the implementation and monitoring of mitigation planting, the regrassing of all cut and fill, compliance with the lighting report, and the containment of domestic activity within the defined curtilage, have been carried through into the volunteered conditions set out in Section 4.2 of the AEE. Those conditions include the preparation and certification of the LMP addressing mitigation planting, wilding conifer control on a rolling seven year cycle, pest control, and a ten year indigenous planting programme, together with development controls addressing building materials and colours (maximum LRV of 10%), curtilage containment, window treatment, external lighting, regrassing, solar panel finishes, and access track formation.
27. In my opinion the LMP is an important consideration in the overall assessment of this proposal, as it secures the enhancement of the natural character values of the wider property that I rely on in my assessment. I note that the planting quantities in the AEE's landscape conditions reflect the earlier landscape plans and should be updated to accord with the plans dated 4 June 2026, including the additional planting associated with the proposed mounding.

THE SITE AND SURROUNDING LANDSCAPE

28. The subject site comprises approximately 202ha and occupies a mid-altitude position on the eastern slopes of the Pisa Range, between the Kawarau Gorge to the south and west and the Cromwell Basin to the north and east. It is accessed via a long private track extending from Ripponvale Road.

29. The site is located within the Pisa Range Outstanding Natural Landscape (ONL). The Pisa Range is a broad, block-faulted mountain range rising to over 1,900m above sea level, forming a dominant topographic backdrop to the Cromwell Basin. It exhibits convex landforms interspersed with gullies, ephemeral channels, and exposed schist outcrops, with upper slopes typically bare or covered in montane tussock and lower slopes transitioning into pastoral or retired high country. To the north and east, the Cromwell Basin has a distinctly different, more enclosed and modified character, with extensive viticulture, pastoral, rural living and urban development, and the influence of man-made Lake Dunstan.
30. I have assessed the site and its context at three scales: the Development Site, the Subject Area (the east-facing southern slopes of the Pisa Range), and the wider regional landscape context. I note that Ms Sue McManaway, in her 8 July 2026 peer review considers that the Subject Area represents the landscape in which the effects of the proposal are best understood, and adopts the same three scales.

The Subject Area: Eastern Pisa Slopes

31. In the 2008 district-wide landscape assessment prepared by LA4 Landscape Architects (the LA4 Assessment), the site is described as sitting within the Pisa Range landscape unit, identified as a "Main Ranges" landscape. My assessment considers the site to be part of a smaller landscape unit which distinguishes the eastern slopes of the Pisa Range from the balance of the broad Pisa Range.
32. The eastern slopes of the Pisa Range are characterised by long, uninterrupted convex forms descending toward the Cromwell Basin. These slopes are expansive, sparsely vegetated, and contain very few built elements, being typically used for low-intensity grazing with occasional vehicle tracks. Built development is sparse, consisting of a small number of modest huts and utility structures, including two

existing huts within the wider catchment and, to the south, a residential building consented under RC230278 (192m², 5m in height, unpainted galvanised iron) approximately 1.3km from the proposed dwelling site. These elements are limited in scale and distribution and generally recessive, reinforcing a perception of rugged, remote occupation rather than rural living expansion.

33. This ONL is not pristine; the land has been grazed and fenced, pest plant and animal species including wilding conifers are present, and farm tracks are evident. There is, however, a very limited presence of structures or buildings. Consistent with my assessment, the landscape retains a high level of natural character; the dominance of natural landforms, the low level of built development, and the expansive views contribute to a landscape that reads as largely intact and undeveloped, and its perceptual naturalness remains strong notwithstanding the presence of exotic pasture and pest species. The landscape also retains a high degree of visual coherence and a strong sense of openness and exposure. Its values are expressed through its openness and landform, its perceptual remoteness and quietness, and its associative links to the working high-country identity of Central Otago. I note that the ongoing spread of wilding conifers and the presence of pest species are actively degrading these values, a matter I return to in discussing the LMP.
34. I acknowledge that the LA4 Assessment identified the "Main Ranges" units, including the Pisa Range, as having extreme sensitivity to change, and that Ms McManaway draws attention to this finding. I also note that the same assessment provides siting guidance for this landscape, recognising that a small amount of rural residential development can be appropriate where it is well screened by existing vegetation or landform and is not located on skylines, ridges or promontories, and that buildings can sit appropriately in valleys or in pockets between rocky outcrops where they are not obvious. In my opinion the Development Site is within a pocket between rocky

outcrops where it is not obvious, and responds directly to that guidance. I return to this guidance, and to the sensitivity of the receiving environment, in my response to the peer review below.

The Development Site

35. The proposed Development Site is located within a subtle saddle-like landform situated toward the centre of the wider property. The saddle lies between two low ridgelines and sits approximately 60m in elevation below the more prominent crest of the Pisa Range above, at an elevation of approximately 680m above sea level and some 440 to 480m above the Cromwell Basin floor. The site is topographically recessed, providing a high degree of local enclosure within what is otherwise a broad and open high-country landscape.
36. To the north, a gently incised valley and ephemeral gully create a natural boundary, while to the east a broad-shouldered rocky knoll provides a high level of screening. These elements contribute to a sense of containment. The area where development is proposed is free from tors or significant outcrops, creating a workable envelope that does not require substantial land reshaping. In my view, this localised containment is a rare quality on the Eastern Pisa Slopes and contributes meaningfully to the appropriateness of the site to absorb built development.

SUMMARY OF MY LANDSCAPE ASSESSMENT AND CONCLUSIONS

37. My full assessment is set out in Section 6 of the Patch Assessment. I summarise my key findings and conclusions below and identify where Ms McManaway agrees with them. I address the matters on which Ms McManaway differs from me separately, later in my evidence, in my response to her peer review.

Visibility of the proposal

38. The Development Site sits within a shallow saddle-like landform on the eastern slopes of the Pisa Range, well below adjacent ridgelines and visually contained by the surrounding topography. During my field investigations I used binoculars, building-height poles, and an on-site vehicle to identify the location of the proposed platform. Even with those aids, the poles and platform were so distant and difficult to discern that they were only barely visible from viewpoints and required significant visual investigation to identify. My nine representative viewpoints confirm that, aside from the unformed road to the west, the proposal will be very difficult to see from the main public vantage points across the Cromwell Basin, owing to intervening landform, viewing distance, muted tones, and proposed landscaping.
39. I note Ms McManaway broadly agrees with this conclusion. She accepts that surrounding landforms substantially limit visibility, that the Development Site is within a naturally recessed location, and that the site is not located on a skyline, ridgeline or terrace edge. She agrees that potential viewing distances from publicly accessible locations are generally long (approximately 3 to 7km), that recessive colours assist, and that the additional cross-sections demonstrate the proposal relies primarily on existing landform containment rather than planting alone. She also agrees that the design and siting of the dwelling, including its height, L-shaped form with the longer wing set back, gable roof, low windows and veranda, are important factors in limiting visibility.
40. The one location where I found the proposal may be readily apparent is the unformed road forming the western boundary of the site, where the dwelling, shed and residential activity will be visible at close range. While the public has a legal right of access along this unformed road, practical access is limited. By way of example, the legal road alignment does not follow any formed track, there is no formed access to the legal road and at lower elevation to the south of the site it crosses a deep

pond and passes through a small forestry block, which further constrains practical access along its length.

41. It is my understanding that people who wish to gain access request consent to use the formed ROW.

Visual effects

42. I assessed the visual effects of the access track as moderate during construction, reducing to low once complete, and the visual effects of general construction as moderate to low, short-term and localised, reducing to low on completion. Ms McManaway agrees with the finding on the access track, and broadly agrees on construction effects (characterising them as potentially up to high in close views and up to moderate in wider views, but temporary and reducing on completion).
43. Overall, I concluded that the visual effects of the completed development will be very low when viewed from most public and private viewpoints in the wider landscape and along the valley floors, and high but very localised from the unformed road to the west. Ms McManaway agrees that the effects from the unformed road will be high. She also accepts the broad conclusion that visibility is limited, although she characterises the residual effects from the wider basin differently to me, a point I address in my response to her peer review.

Landscape character effects

44. I concluded that the proposal will result in a moderate adverse effect on the open and natural character of the hills and ranges at the scale of the site and its immediate setting, reflecting the introduction of permanent residential activity into an ONL with very limited built development. I assessed the effect on the broader rural character values as low, and considered that the overall coherence of the wider landscape would be maintained.

45. Ms McManaway agrees with a number of these findings. She agrees that the eastern Pisa foothills are characterised by long, uninterrupted convex slopes, open skylines, and a sense of exposure and remoteness, and are sensitive to further development. She broadly agrees with my assessment ((at para 6.19 of the Patch Assessment, quoted by Ms McManaway at her para 6.36) that the proposal introduces a distinctly domestic element into a landscape defined by natural processes and landform patterns. She agrees that the proposal responds positively to relevant landscape values by avoiding skylines, using a recessed location, employing recessive colours and controlling lighting. At the scale of the wider Pisa Range ONL, Ms McManaway agrees with my assessment that effects are very low to low, reflecting the extensive scale of the landscape and the localised nature of the proposal.
46. The proposed planting and LMP will assist in integrating the development and enhancing the natural attributes of the wider property over time, and I consider the LMP will provide significant benefits. I differ from Ms McManaway's characterisation of the LMP as mitigation. In my opinion the LMP is properly characterised as an enhancement and offset measure, and in my view it will significantly offset the residual character effects of the proposal by reversing the ongoing spread of wilding conifers and enhancing the natural character values of the wider landscape. I address this further in my response to her peer review below.

Cumulative effects

47. I assessed cumulative effects as low to low-moderate. When considered alongside the consented dwelling under RC230278, the two small, existing huts on site, and the existing farm access, the built elements remain widely spaced, small in scale, and visually contained. In my opinion these do not collectively overwhelm the character of this part of the Pisa Range.

48. Ms McManaway reaches a broadly similar position, considering cumulative effects to fall within the low-moderate to moderate range, and characterising the proposal as an isolated and carefully sited development rather than part of a concentrated pattern of rural residential expansion.

Conclusions

49. My overall conclusions in the Patch Assessment were that:
- (a) the visual effects of the proposal will be very low from the wider landscape and valley floors, and high but very localised from the unformed road to the west;
 - (b) the proposal will have a moderate adverse effect on the open and natural character of the site and its immediate setting, a low effect on the broader rural character, and very low to low effects at the scale of the wider Pisa Range ONL;
 - (c) the LMP will offset the residual character effects over time by enhancing the natural character and physical attributes of the site and wider property; and
 - (d) cumulative effects will be low to low-moderate.

In my opinion the proposal has been carefully designed and sited to respond to the landscape's characteristics, and the landscape and visual values of the Pisa Range ONL will be maintained. I note that Ms McManaway accepts that the proposal has been carefully designed and sited, that it benefits from existing topographic containment which substantially limits visibility from most publicly accessible viewpoints, and that she reaches similar broad conclusions regarding visibility.

THE UPDATED CROSS-SECTIONS AND DESIGN RESPONSE

50. Following the Council's request for further information, I prepared three cross-sections through the Development Site to assist in understanding the degree of existing and proposed screening and containment. The sections are drawn at surveyed levels and show the relationship between the proposed buildings, the residential curtilage, the enclosing landform, and the proposed mitigation planting and mounding. I describe below what each section revealed, and the design response that followed.
51. Section A runs through the northern part of the residential curtilage area. It shows the curtilage floor at approximately 674.90m, contained by landform rising to approximately 678.00m. This demonstrates that the wider area of residential activity, including the northern extension of the curtilage intended for a production-style garden, is enclosed by existing landform, limiting the visibility of the broader pattern of domestication associated with residential use rather than the buildings alone.
52. Section B runs through the dwelling. It shows the dwelling platform at approximately 678.60m, with the rocky knoll to the east rising to approximately 680.75m, that is, approximately 2m above the platform. The knoll does not screen the full height of the dwelling; the upper portion of the gable roof form will sit above it. However, the practical significance of this relationship must be understood from the actual viewing locations. The publicly accessible viewpoints in the Cromwell Basin sit some 440 to 480m below the Development Site at distances of approximately 3 to 7km. From those locations the upward viewing angle means the knoll occludes a substantial proportion of the building, and any visible upper portions are seen against the rising backdrop of the Pisa Range slopes behind, not against the sky, in a dark recessive finish at considerable distance. The section also shows the proposed

low flammability and mitigation shrub planting on and around the knoll, which will supplement the landform screening over time.

53. Section C runs through the shed and the western part of the curtilage. It revealed that the shed, while partially contained by the eastern knoll in views from the east and southeast, was less contained in views from the south. This was the principal matter of substance to emerge from the sections, and the proposal was amended in response.
54. The design response is an area of mounding, up to approximately 2m in height, located south of the shed adjacent to the proposed mountain beech planting area. The mound will be formed from excavated material won from the site, which has the added benefit of retaining cut material within the Development Site rather than requiring disposal elsewhere. The mound will be shaped to natural contours, topsoiled, and revegetated, and together with the adjoining beech planting will screen the shed in views from the south as the planting establishes.
55. Ms McManaway notes (at her para 5.5) that the response to the request for further information stated the mound would be planted with further beech trees, but that the plans dated 4 June 2026 did not show this planting and it was unclear whether the stated quantities reflected it. While the planting of mound was proposed as part of the conditions submitted as part of the response to the further information, this has now been addressed through proposed conditions.
56. I support Ms McManaway's recommended condition that all earth mounding be formed generally in accordance with the approved plans and be recontoured, topsoiled and revegetated following construction, and I note her recommendation that the Consent Holder provide final architectural and landscape plans to the Council for certification, which will capture this detail.

57. I note that Ms McManaway found the cross-sections particularly useful in demonstrating that the proposal relies primarily on existing landform containment rather than screening by planting alone, and that she agrees the sections show both the dwelling and the associated curtilage area to be relatively contained. In my opinion the sections confirm the central premise of my assessment: the Development Site is a naturally recessed pocket in which built form and residential activity can be accommodated with very limited visibility from the wider landscape, and the mounding response addresses the one location where the sections showed containment to be slightly weaker.

RESPONSE TO THE PEER REVIEW OF MS McMANAWAY

58. I have read the peer review prepared by Ms McManaway. I note at the outset that Ms McManaway agrees with a substantial number of my findings, as summarised above, and that she accepts the proposal has been carefully designed and that in her view my assessment likely reaches the correct broad conclusion regarding limited visibility. The matters of genuine disagreement between us are limited, and I address each below.

Use of the term 'natural character'

59. Ms McManaway considers (at her para 2.4) that 'natural character' has specific application to the coastal environment, wetlands, and lakes and rivers because of s6(a) of the RMA, and can be confusing when used outside those reference points. I disagree that my use of the term is inapt in this context, for three reasons.
60. First, while s6(a) directs particular attention to natural character in those environments, *Te Tangi a te Manu* itself makes clear that the assessment of natural character is not confined to them. As Ms McManaway herself acknowledges (at her para 2.5), the Guidelines state that the same principles and approaches apply to assessing

natural character as apply to other types of character, with the focus on natural characteristics and qualities and their collective expression.

61. Second, and importantly, the Operative Central Otago District Plan itself uses the term 'natural character' outside the s6(a) contexts, and directs that it be assessed. Objective 4.3.3 refers to the "open space, landscape, natural character and built environment values" of the rural environment and to maintaining the "open natural character of the hills and ranges." Policies 4.4.2 and 4.4.10 likewise refer to the natural character of the rural environment and of the hills and ranges. My assessment is required to respond to those provisions, and it would not be possible to do so without assessing natural character in this landscape.
62. Third, my report defines the term transparently at the outset (Patch Assessment, para 3.5), adopting the *Te Tangi a te Manu* framing of physical, perceptual and associative values. There is accordingly no ambiguity about what is being assessed. In my opinion the use of the term is orthodox, is directed by the District Plan, and is consistent with the Guidelines.

Photography and the use of a 50mm lens

63. Ms McManaway notes (at her paras 2.6 to 2.7) that the provision of 50mm photographs has limitations, and cites the NZILA Best Practice Guide for Visual Simulations (BPG 10.2) in support of panoramas as best practice. I have reviewed BPG 10.2 and make the following points in response.
64. First, BPG 10.2 is a guide to the preparation and presentation of photomontage-based visual simulations. The photographs in my Graphic Attachment are not visual simulations; they are context photographs provided to assist in understanding the landscape setting and the visibility of the proposal, and Ms McManaway acknowledges

(at her para 2.7) that they assist in that understanding. The guide's detailed requirements for simulations are therefore not directly engaged.

65. Second, to the extent BPG 10.2 addresses lens selection, it does not support the criticism. The guide expressly states that it does not advocate a particular focal length or camera format for all situations, and records that a 50mm lens or its digital equivalent is widely used. It further explains that a 50mm image printed at approximately A3 size and held at the appropriate reading distance replicates the scale of the real scene. That is why I have used a 50mm image. The use of a 50mm lens has been standard practice in landscape assessment in New Zealand for decades, and in my opinion it remains entirely appropriate in this context.
66. Third, the guide is careful to note that no photograph of any focal length replicates the human field of view, and that each format involves trade-offs: wide-angle lenses of 28mm or less are prone to distortion at the image margins, and panoramas introduce their own viewing-geometry complications, being accurately experienced only when curved or viewed under particular conditions. A panorama is not a neutral improvement; it is a different tool with different limitations.
67. Fourth, and most significantly for this application, a wider field of view would if anything understate the proposal. The assessment question here is whether a distant, recessive building set within an expansive mountain backdrop is discernible at viewing distances of approximately 3 to 7km. Within a panorama the development would occupy a significantly smaller proportion of the image than it does in a 50mm frame. The 50mm photographs are therefore conservative for the purpose to which they were put: they present the development site at a larger relative scale than a panorama would, and the proposal remains very difficult to discern even so. A panorama would show more of the surrounding landscape context, but it would not alter the central

finding, which Ms McManaway accepts, that the development is unlikely to be readily discernible from these viewpoints.

68. Finally, my visibility findings do not rest on the photographs alone. They rest on repeated field investigation, including the erection of surveyed height poles observed from each viewpoint with binoculars. The methodological point therefore has no bearing on the reliability of my conclusions.

Building height and the finished floor level

69. Ms McManaway notes (at her paras 5.3 and 6.26) that the 5.5m maximum height is referenced to finished floor level (FFL), and that with the FFL approximately 450mm above finished ground, the overall building height may approach 6m above ground level, which she considers would reduce the level of visual containment provided by the adjacent landform.
70. The premise is correct; the 5.5m is measured from FFL. In my opinion, however, the inference drawn from it is not, for two reasons.
71. First, my field verification already accounted for the actual height of the building above ground. As recorded in the AEE (Figure 2), the height poles erected at the site were surveyed to mark the apex points of the roofed area from the proposed finished ground level. The visibility observations I made from the representative viewpoints were therefore made against the true, as-built apex height, not against a height understated by the FFL offset. The conclusions in my assessment already reflect the building as it will actually present.
72. Second, any additional 450mm makes no material difference to visibility at the relevant viewing distances. From the closest valley-floor viewpoint (approximately 3.3km) and the majority of viewpoints (5 to 7km), a 450mm increment at the roof apex would be imperceptible

within the visual complexity of this landscape. The relationship between the dwelling and the eastern knoll is shown accurately, at surveyed levels, on the cross-sections, and as I have described in the preceding section of my evidence, the knoll was never asserted to screen the entire building; my assessment relies on the combination of landform containment, low viewing angles, distance and recessive colouring to render the building very difficult to discern. Ms McManaway agrees with that combination of factors (at her paras 6.17 and 6.25). The FFL point therefore does not affect my conclusions.

Views from the unformed road

73. I assessed the visual effects from the unformed road as high, and Ms McManaway agrees with that finding. I maintain that assessment; it is an honest reflection of the close-range view from that location. The point of difference is the weight this location should carry in the overall conclusions. While the public has a legal right of access along this unformed road, practical access is limited: the legal alignment follows no formed track, and at lower elevation it crosses a deep pond. The viewing audience at this location is accordingly very small and infrequent, and the duration of any visibility would be brief, as the development is apparent only from a short (approximately 150m) stretch of the legal road, disappearing as the alignment ascends above or descends below the Development Site. In my opinion, a high effect experienced fleetingly by very few viewers should not be given weight equivalent to the very low effects experienced by the many thousands of viewers in the wider basin. To do so would distort the overall picture of the proposal's visual effects.

Visual effects from the wider basin: 'very low' versus 'low to low-moderate'

74. Ms McManaway considers (at her paras 6.34 and 7.5) that completed visual effects from the wider basin are more appropriately

characterised as low to low-moderate rather than very low. The basis for this difference is not a disagreement about what will be seen; she accepts visibility will be limited and that the development is "unlikely to be readily discernible" (her para 6.11). The difference lies in the weight she attributes to the significance of introducing built form into an ONL backdrop (her para 6.31).

75. In my opinion this conflates two distinct assessment questions. Visual effects concern the change to views and visual amenity actually experienced by viewers. Where a development is, on her own analysis, unlikely to be readily discernible from the relevant viewpoints, the visual effect experienced by those viewers is negligible, which is precisely what a very low rating describes. The significance of introducing built form into the ONL is real, but it is a landscape character effect, and both of us have assessed it as such; indeed, my moderate character effect rating at the site scale reflects exactly that consideration. Counting the same concern again within the visual effects rating double-counts it. Applying the ratings as defined in my assessment, a development that is not readily discernible cannot coherently generate a low-moderate visual effect, which denotes "some perceptible change." For these reasons, I consider that Ms McManaway's rating of low to low-moderate is not supported by her own findings on visibility, and that my assessment of very low is the correct characterisation of the visual effects from the wider basin.

Landscape character effects and assessment scale

76. Ms McManaway assesses character effects at the Development Site scale as moderate to moderate-high (her para 6.40), at the Subject Area scale as moderate (her para 6.41), and at the wider ONL scale as very low to low (her para 6.42). She also asks (at her para 6.43) that I clarify the scale to which my moderate conclusion attaches.

77. I am happy to provide that clarification. My conclusion of a moderate adverse effect on open and natural character attaches to the Development Site and its immediate setting. At that scale, our positions are close; her range simply extends a step higher. To the extent she reaches moderate-high, I disagree. A moderate-high effect denotes a clearly noticeable change affecting key attributes or qualities of the landscape. By way of illustration, in this setting a moderate-high effect would arise from development of a materially different order: for example, a larger, two-storey dwelling in a lighter, reflective finish sited on the open face of the slope, a cluster of buildings with extensive formed curtilage, or a small quarry with its associated benching, exposed faces and stockpiles. Development of that kind would visibly alter the landform patterns, openness and coherence that are the key attributes of this landscape. The proposal, by contrast, is of a fundamentally different character: low, recessive buildings set within a contained saddle, where the enclosing landform and its patterns remain the defining elements and the coherence of the landform system is unaltered. This occurs within a small part of a 202ha site. That is the signature of a moderate effect, not a moderate-high one.
78. The Patch Assessment did not separately rate the Subject Area, and in response to Ms McManaway's request for clarification I now provide my opinion at that scale. Ms McManaway reaches moderate at the Subject Area scale, reflecting what she describes as a degree of erosion of undeveloped character. In my opinion this overstates the effect. The Subject Area is extensive and the development will occupy a small, visually contained saddle-like pocket amounting to a minute fraction of the extensive east-facing southern slopes of the Pisa Range and a small part of the 202ha site itself. The development will be invisible from almost all of the Subject Area, and, as Ms McManaway accepts, the defining characteristics of the wider landscape, including its landform, skyline patterns and legibility, will remain intact. She also accepts (at her para 6.41) that the LMP will deliver broader landscape benefits across the wider property at precisely this scale, through the

restoration of indigenous vegetation, wilding conifer control and predator control. In my opinion, when those enhancements are properly brought to account, the residual character effect at the Subject Area scale sits at low to low-moderate, and certainly no higher than the moderate rating Ms McManaway has reached.

79. Ms McManaway also draws attention (at her paras 6.44 and 6.45) to an apparent tension in the Patch Assessment between the acknowledgement that built form will alter the perception of naturalness and openness, and the conclusion that the broader landscape character will remain intact and landscape values maintained. There is no inconsistency between those statements once the scale to which each relates is understood. The first describes the effect at the scale of the Development Site and its immediate setting, where I have assessed a moderate adverse effect on open and natural character. The second describes the outcome at the scale of the Subject Area and the wider ONL, where the defining attributes of the landscape, its landform patterns, skylines, openness and legibility, remain unchanged and the proposal is barely perceptible. Assessing effects at nested scales in this way is directed by Te Tangi a te Manu, and Ms McManaway adopts the same three scales in her own review. Her own conclusions describe the same gradient, with effects reducing from the site scale to very low to low at the scale of the wider ONL.

The Landscape Management Plan: mitigation, and the weighing of positive effects

80. Ms McManaway characterises the LMP as mitigation rather than an offset measure (her para 5.7). More significantly, in my opinion her assessment does not appropriately bring to account the positive effects of the LMP on the character of the landscape, at any scale.
81. The LMP is not confined to integrating the built form. It commits to the eradication of wilding conifers across the wider 202ha property on a

rolling seven-year cycle, indigenous planting of at least 500 plants per annum on average over ten years in gullies and on south-facing slopes, and sustained pest and predator control. These commitments are secured through the volunteered conditions, with the LMP subject to certification by the Council. Wilding conifer spread is identified in the District Plan as a significant threat to Central Otago's landscapes, and it is an active and ongoing process on and around this property. Without intervention, the naturalness and openness that underpin this ONL's values will continue to be progressively eroded irrespective of whether this proposal proceeds. The LMP stops and reverses that process. It therefore enhances the very biophysical and perceptual values, naturalness and indigenous character, on which Ms McManaway's adverse ratings rest, and does so at the property scale rather than merely around the proposed buildings.

82. Whether that programme is labelled mitigation, or enhancement, it must be weighed. Ms McManaway acknowledges the LMP's benefits in passing (her paras 6.40 to 6.41), but her effect ratings do not visibly reflect them, and her conclusion does not engage with them at all. In my opinion, an assessment that counts the adverse effect of introducing built form into this landscape, but does not count the concurrent, secured and enduring enhancement of that same landscape's natural values, is incomplete. When the LMP is properly weighed, the residual character effects of the proposal reduce over time at every scale of assessment.

Cumulative effects and 'landscape capacity'

83. Ms McManaway assesses cumulative effects as low-moderate to moderate, against my low to low-moderate, and further comments (at her para 6.49) that should the proposal be approved, "this part of the landscape will likely reach its capacity to accommodate this form of change."

84. Our ratings differ by a step and I do not regard that difference as material. However, I do not agree with the capacity observation. It is a prediction about future applications rather than an assessment of this proposal's effects, and it is not supported by analysis of the landscape's absorption capability. Each future proposal would be assessed on its own merits against the receiving environment as it then exists. I would also observe that Ms McManaway herself characterises this proposal as "an isolated and carefully sited development rather than part of a concentrated pattern of rural residential expansion" (her para 6.49), a characterisation with which I agree, and which in my opinion is difficult to reconcile with the suggestion that a single dwelling on a 202ha holding exhausts the capacity of the landscape to accommodate the proposed activity.
85. I also note that Policy NFL-P2(1) of the now-operative Otago Regional Policy Statement (ORPS, Otago Regional Council public notice, 27 June 2026: Otago Regional Policy Statement 2021 made operative on 9 July 2026) directs that ONLs be protected by avoiding exceeding the landscape capacity of the natural feature or landscape. Ms McManaway's assessment is that, should the proposal be approved, this part of the landscape will likely reach its capacity, not that this proposal exceeds it. On her own assessment, the proposal sits within the capacity of the landscape to absorb this form of change, and the direction of the policy is met. I agree with this assessment. Whether any future proposal would exceed capacity would be assessed against the receiving environment as it then exists.

Rating descriptors

86. Ms McManaway notes (at her para 2.2) that the descriptions provided against each rating in my assessment are customised, and cautions that descriptors must not steer conclusions. I agree with the caution as a general proposition, but the descriptors in my assessment do not steer conclusions. They are published transparently in the report

(Patch Assessment, para 3.6), they are conventional in content, and they align with the seven-point scale in *Te Tangi a te Manu* that both of us have applied. Ms McManaway does not identify any respect in which any descriptor has in fact skewed any rating, and I note she was able to apply the same scale to reach her own conclusions. The point is, with respect, theoretical.

Statutory context

87. Ms McManaway suggests (at her para 3.12) that the assessment would benefit from acknowledging the higher-order statutory context, and sets out provisions of the Operative Otago Regional Policy Statement 2019 and the Proposed Otago Regional Policy Statement 2021. The selection of the statutory instruments addressed in the application is ultimately a planning matter, and I defer to the planning evidence in that respect. I note that an assessment against the relevant provisions of both instruments has been prepared and accompanies the application material and I have reviewed it.
88. I also note that the Proposed Otago Regional Policy Statement 2021 was made operative on 9 July 2026, the day after Ms McManaway's review is dated, and the 2019 RPS is no longer operative. The relevant landscape provisions are accordingly now those of the operative ORPS 2021.
89. From a landscape perspective, nothing in those provisions alters my assessment. They direct the protection of ONL values and the avoidance, remedying or mitigation of adverse effects, which is precisely the framework within which my assessment has been undertaken, and my conclusion is that the values that contribute to the Pisa Range ONL being considered outstanding will be maintained.
90. I also draw attention to Policy NFL-P4 of the ORPS 2021, which promotes the restoration of the areas and values of outstanding natural

features and landscapes where those values have been reduced or lost. The LMP, through wilding conifer eradication, indigenous planting and pest control across the wider property, gives effect to exactly that direction, and in my opinion this higher-order support for restoration reinforces the weight that should be given to the LMP in the overall assessment.

91. Ms McManaway does not suggest that consideration of the regional provisions would lead to any different landscape conclusion, and having reviewed them, neither do I.

Ms McManaway's recommended conditions

92. Ms McManaway sets out a series of recommendations (at her section 8.1) should consent be granted. I have reviewed these and support them, subject to the following comments.
93. I support development being implemented in accordance with the volunteered design controls, and the provision of final architectural and landscape plans to the Council for certification; as noted earlier in my evidence, the landscape plans have been updated to show the mound planting and revised quantities, and the certification process will capture that detail. I support the preparation of the LMP with advice from a suitably qualified landscape architect and ecologist. I support her recommended mounding condition. I support her recommended curtilage controls, including the avoidance of exotic specimen trees, swimming pools, tennis courts and flagpoles, the grouping of any structures with the house, recessive and low-reflectivity materials, and rural post-and-wire fencing only; these controls are consistent with the containment approach that underpins my assessment. In relation to lighting, I support lighting being kept to the node of development within the curtilage area, and the use of downlights or light shades where practicable.

94. Ms McManaway also recommends (at her paras 6.29 and 8.1) that the volunteered development control regarding curtains, blinds or tinted windows be extended from west-facing windows to all glazing. I note the dwelling's design already limits potential light transmission through its low windows and veranda roof, as Ms McManaway observes (at her para 6.28), and the exposure of glazing above the enclosing landform is limited. That said, I do not oppose the extension of the condition, and I consider it can be accommodated without difficulty.

Conclusion on the peer review

95. The areas of genuine disagreement between Ms McManaway and I reduce to matters of weight: the weight to be given to a high effect experienced briefly by a very small viewing audience; the weight to be given to the presence of built form that both of us agree will be very difficult to discern; and the weight to be given to the positive and enduring enhancement delivered by the LMP. On each of those matters, for the reasons I have given, I consider my assessment attributes the appropriate weight, and I confirm the conclusions of the Patch Assessment.

CONCLUSION

96. The proposal seeks to establish a single dwelling, shed and associated infrastructure on a 202ha landholding on the eastern slopes of the Pisa Range, within the Pisa Range ONL. The Development Site sits within a subtle saddle-like landform that provides a high degree of natural containment on the Eastern Pisa Slopes, a pocket between rocky outcrops where built development is not obvious.
97. My assessment concluded that the visual effects of the completed development will be very low from the wider landscape and valley floors, and high but very localised from the short stretch of unformed road to the west, where practical public access is limited. The proposal

will have a moderate adverse effect on the open and natural character of the Development Site and its immediate setting, a low effect on broader rural character, and very low to low effects at the scale of the wider Pisa Range ONL. Cumulative effects will be low to low-moderate.

98. Ms McManaway's peer review agrees with the substance of my assessment in most respects; the appropriateness of the methodology and assessment scales, the careful siting and design of the proposal, the limited visibility from virtually all public viewpoints, the high but localised visual effects from the unformed road, the value of the mitigation planting and LMP, and the very low to low effects at the scale of the wider ONL. The remaining differences between us reduce to matters of weight; the weight to be given to a high effect experienced briefly by a very small viewing audience, the weight to be given to the presence of built form that both of us agree will be very difficult to see; and the weight to be given to the positive and enduring enhancement delivered by the LMP. For the reasons set out in my evidence, I consider my assessment attributes the appropriate weight to each of these matters.
99. Both Objective 4.3.2 of the District Plan and Objective NFL-O1 and Policy NFL-P2 of the ORPS 2021 are directed at protecting outstanding natural landscapes from inappropriate subdivision, use and development. In my opinion, for the reasons set out in this evidence, this is not inappropriate development. It is a single, carefully sited dwelling within a naturally contained landform, of the kind expressly contemplated by the LA4 Assessment's siting guidance for this landscape, designed and conditioned so that the values that make this landscape outstanding are maintained and, through the LMP, enhanced over time.
100. I remain of the opinion that the values that contribute to the Pisa Range ONL being considered outstanding will be maintained, and that over time the LMP, through wilding conifer eradication, indigenous planting

and pest control across the wider property, will enhance the natural character values of this landscape, consistent with the restoration direction of Policy NFL-P4 of the now-operative ORPS 2021. The adverse landscape and visual effects of the proposal are localised, contained, and in my opinion acceptable in this receiving environment.

Dated 27 July 2026

Stephen Russell Skelton