

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE
QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Te Pūtahi Ladies Mile Plan Variation in accordance
with section 80B and 80C, and Part 5 of Schedule 1 of the
Resource Management Act 1991.

**REPLY TO QUESTIONS ASKED OF STEPHEN RUSSEL SKELTON
24 November 2023**

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Introduction

- 1 My full name is Stephen Russel Skelton. I am the Director of Patch Limited (**Patch**), a landscape architecture and landscape planning consultancy based in Queenstown.
- 2 I prepared a statement of evidence on behalf of Queenstown Lakes District Council (**QLDC** or **Council**) dated 29 September 2023 on the submissions and further submissions to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**). I also provided rebuttal evidence dated 10 November 2023.

Response to Questions

- 3 My response to the questions filed by Corona Trust are set out in **Attachment A**.
- 4 My response to the questions filed by Glenpanel Developments and the Anna Hutchinson Family Trust are set out in **Attachment B** below.

Stephen Russel Skelton

24 November 2023

Attachment A: Response to questions on behalf of the Corona Trust

Response to questions on behalf of Corona Trust	
Question	Response
Please explain from a landscape perspective why you consider there is no need to have a landscape buffer (of any width) between the Sub Area H2 and the lower terrace on Max's Way?	I consider any landscaping which would be to the benefit of Corona Trust could be undertaken on their site, on the terrace escarpment. Naturally, I expect future owner within the H2 area will undertake some planting on their site, but I do not consider this to be a requirement which would mitigate any effects on Max's Way.
Did you take into account that the escarpment location and form to the south of Sub Area H2 has been recently modified by earthworks (note: this can be seen on Google Earth)? In light of this and the position of Mr Jeff Brown (who supports a setback from the cadastral boundary), do you consider that it is most certain to apply a setback from the cadastral boundary?	I understand that the upper edge of the escarpment may change through permitted earthworks. While using a landscape feature, such as a terrace edge is a desirable landscape outcome for setting setbacks and other rules/standards, in this instance the cadastral boundary between Sub Area H2 and the Corona Trust site closely follows the upper edge of the escarpment. Part of that boundary, the northern most part, deviates from the upper edge of the escarpment and crosses a flat part of the upper terrace, up to 7.5m away from the terrace edge. I acknowledge that in this instance a setback measured from the cadastral boundary may be more certain.

Attachment B: Response to Joint Questions on behalf of Glenpanel Developments Limited (73) and Anna Hutchinson Family Trust (107)

Joint questions on behalf of Glenpanel Developments Limited (73) and Anna Hutchinson Family Trust (107)		
#	Question	Responses
Broad Topic: Landscape / urban design		
30	<p>You say that the TPLM Variation area will not be visible from Quail Rise and other areas.</p> <p>Do you accept that:</p> <p>(iii) this is not correct: or</p> <p>(iv) is dependent on your selected viewing position, for example, Viewpoint 2 of Mr Milnes GA to his primary evidence.</p> <p>In respect of your conclusion that there are high adverse effects associated with “potential” skyline breaches from the ferry bridge, Queenstown Trail, and the Shotover River, what modelling, if any, have you undertaken to inform this opinion (taking into account the latest suite of proposed provisions).</p>	<p>(iii) The TPLM Variation Area will be reasonably difficult to see from public places in Quail Rise.</p> <p>(iv) My assessment of the visibility of the TPLM Variation Area considers the existing trees within the Lower Shotover Cemetery. These trees are mostly high stature, non-wilding and are within a public place where the amenity they provide is desirable to retain. These trees, in combination with the terraced landform to the west of the TPLM Variation Area provide a high degree of visual screening from eastern vantages.</p> <p>Modelling:</p> <p>I have considered visibility of the TPLM Variation Area from public places within Quail Rise and consider that significant intervening buildings and vegetation within Quail Rise itself will largely restrict any visibility of TPLM Variation Area. As stated above, the existing high stature trees in the cemetery also provide a high degree of the TPLM Variation area from western views.</p>

Joint questions on behalf of Glenpanel Developments Limited (73) and Anna Hutchinson Family Trust (107)		
#	Question	Responses
		<p>There may be some more elevated private places within the Quail Rise area where development within the TPLM variation area may be visible. however, I have not had access to those sites but have seen no evidence that the TPLM Variation area will be visible from any public places within Quail Rise. In terms of skyline breaches, I undertook a modeling exercise prior to preparing my EIC. I am unclear on what 'the latest suite of proposed provisions' refers to.</p> <p>On 17 November 2023 I revisited the public places around the proposed extension area, including the Shotover Ferry Bridge, the Queenstown Trail and Spence Road. Views to the southeast from these public places are dominated by existing high stature, mostly wilding trees. However, my modeling exercise has revealed that the locations and scale of proposed development within the extension areas may be on skyline in southeastern views from public places.</p>
31	Please identify, on your EIR Figure 1, where the ONF line exists.	Refer to Figure 1 at the bottom of this Attachment.
32	<p>Do you accept that:</p> <p>(a) there is already built development between the extension area and the river's edge in this location;</p> <p>(b) the extension area is at the junction of three landscape units (as identified in the WBLUPS); and</p>	<p>(a) Yes, limited rural living type development integrated into the landscape with mature vegetation which renders that existing built development difficult to see from most locations, particularly from SH6 and the western side of the Shotover River.</p>

Joint questions on behalf of Glenpanel Developments Limited (73) and Anna Hutchinson Family Trust (107)		
#	Question	Responses
	(c) when considering the extension area in the context of the Shotover Terraces (which have been severed by SH6) there is development on the lower terraces already.	(b) The extension area is entirely within LCU 7, but near the junction of 3 LCUs. (c) Yes, refer to my answer to a above.
33	Mr Brown considers that the Hutchinson land is appropriate for urban development in the future, including through a future urban zone, or inclusion within the next Spatial Plan. Do you consider that the landscape opposition that you have, which cannot logically change in the future (since you have considered the future environment), are so great, and cannot be mitigated, so as to preclude any such future zoning for urban development?	I consider that in this instance if the extension area were to be zoned for urban development, that urban development should be considered across all of LCU 7 and not be limited to such a small area. I do not 'oppose' the submission; I only assess the effects of the submission on landscape and visual values. In the future the need for urban development may be so high that adverse landscape and visual values may be acceptable.
Broad Topic: Landscape – Glenpanel		
39	Do you accept that: (a) you had previously indicated to Glenpanel Development Limited's Mark Tylden that you could support up to at least six residential sites on the ONF?; and (b) in any event, you are sufficiently familiar with the site to have a view on the relief sought in respect of the slight	(a) I do not recall any such conversation with Mr Tylden and have provided no written landscape advice supporting a proposal for residential development within the Slope Hill ONF. However, I have also worked for Mr Tylden in preparing the Flints Park SHA application. During that exercise we tested the inclusion of

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#	Question	Responses
	<p>extension of the TPLM Variation area up the toe of the slope, with a corresponding shift in the ONF line, and the proposed location of the UGB; and</p> <p>(c) if so, you are able, and should, to best assist the Panel, give evidence as to your opinion on the relief sought.</p>	<p>development low in the ONF but resolved to leave all built development out of the ONF as mapped at that time.</p> <p>(b & c) I have not been engaged to address the Slope Hill ONF boundary matters as they relate to the TPLM Variation Area or the Glenpanel submission seeking to shift the ONF boundary. As I have not undertaken a detailed assessment or consideration of the Slope Hill ONF lines, I defer to Bridget Gilbert's evidence on behalf of the Council.</p>



Figure 1: Response to #31.