PROPOSED TE PŪTAHI LADIES MILE PLAN VARIATION

SUMMARY OF EVIDENCE OF STEPHEN RUSSEL SKELTON ON BEHALF OF THE QUEENSTOWN LAKES DISTRICT COUNCIL

- As directed by paragraph 12.2 of Hearing Minute 1, I set out below a summary of the key points of my evidence. I have prepared a statement of evidence in chief dated 29 September 2023, and a statement of rebuttal evidence dated 10 November 2023. I have provided answers to written questions from submitters dated 24 November 2023.
- Appendix A of this summary provides a written response to the Hearing Panel
 Minute: Pre-Hearing questions dated 21 November 2023. Appendix B contains my
 written response to the questions from Glenpanel Developments Limited (GDL) on 1
 December 2023.

Succinct summary of key points of my evidence

- I consider the proposed TPLM Variation will change the Variation Area from a mostly rural area to an urban character area. This urban character area will be well contained within the Ladies Mile landscape character unit (LCU).
- 4. Development will generally only be visible from within the Ladies Mile LCU itself and from distant views. When seen from distant views, development enabled by the TPLM Variation will be seen on the periphery of the broader visible landscape and in tandem with other existing urban areas such as Shotover Country and Lake Hayes Estate. While the Ladies Mile LCU's existing open character will be changed the primary amenity available from this landscape character unit is embodied in visibility of the wider Outstanding Natural Landscape (**ONL**), which will be retained to a moderate to high degree.

Latest position on the matters remaining in dispute (including any answers through the question process)

- My evidence also provided a response to a number of issues raised by submitters, and my rebuttal evidence responded to submitter's landscape expert evidence (excluding the landscape effects of the Slope Hill urban growth boundary issue as is this is not within the scope of my evidence, instead covered by Ms Bridget Gilbert).
- 6. The main area of dispute is the landscape effects with regard to extending the TPLM Variation Structure Plan, sought by the Anna Hutchinson Family Trust (**AHFT**, submitter 107). I do not consider the intensification of this submitters land to be

appropriate, mainly in that development on the Shotover River terraces will extend urban development into another LCU which is highly visible from places where the TPLM Variation Area is not and would result and adverse effects on the values of both that LCU, the Shotover River Outstanding Natural Feature (**ONF**) and Slope Hill ONF. I am also of the opinion that the AHFT extension area sought would open up potential for urban development to extend north, with no defendable edge, where currently as proposed, the TPLM Variation has a defendable edge to urban development.

Dated: 4 December 2023

Appendix A – Response to Hearing Panel Minute: Pre-Hearing Questions

- 1.37 Please explain in its entirety the 'gateway' into Queenstown from 'end to end', including with reference to the setback along the southern side of SH6 adjacent to Frankton Flats? How important is the 'gateway' and is it referred to in any District Plan objectives or policies? Other than a landscaped setback, what other ways can a gateway be expressed and were these considered? (This is particularly relevant to the Panel's consideration of what form of development and development setback might be most appropriate.)
- The experience of entering Queenstown from the east is a narrative and, in my opinion, the road user does not actual experience an arrival into Queenstown itself, until they round a bend in the Frankton Road near the Pounamu Apartments and first see the Skyline Gondola.
- 2. Users first experience a closeness to Queenstown on an easterly approach in two ways; from the Crown Range Road and from SH6. From the Crown Range Road, a sense of closeness is first experienced when elevated views are available towards the Whakatipu Basin and Lake Whakatipu and that experience is relatively consistent until the user meets the base of the Crown Range Zig Zags. From SH6 once users cross the Shotover River bridge near the bungee bridge, the verdant approach along a long straight of highway across the Gibbston Highway Flats provides a change in character and a sense of closeness. These approaches converge near the base of the Crown Range Zig Zag. Users of SH6 then round the open character of the Bendamere Hills where near the Amisfield property, views are revealed to the west across the southern Lake Hayes area. Here, a sense of arrival is experienced as users experience a change in character perpetuated by more intense rural living and peri-urban areas on the lower, north facing slopes of Morven Hill and adjacent to Lake Hayes' eastern edge. The junction of the Arrowtown - Lake Hayes Road and SH6 also contribute to a change in character. The SH6 user descends into the Lake Hayes basin which displays a limited, natural and open character at its western end. It is not until the user emerges from the Lake Hayes basin on to the Ladies Mile terrace itself, that the urban areas of the wider Queenstown area become clearly present. It is at this point, which is indicated in the Landscape JWS where, as a result of the TPLM Variation, the Queenstown gateway will exist and the user will feel they have arrived to the greater Queenstown urban area.
- 3. To my knowledge, a gateway is not referred to in the district plan objectives and policies, however Schedule 24.8 describes part of the Ladies Mile LCU's sense of place being its role as a green entrance to Queenstown.
- 4. There are other ways in which gateways can be expressed. In my opinion setbacks do not necessarily contribute to the gateway experience and instead they retain a

sense of openness and open views across the landscape to the wider ONLs. Other ways gateways can be expressed include both a change in speed limit, signs, and legible change in land use.

- 1.38 Simplistic modelling of the visual impact of development on the Anna Hutchinson Family Trust land has been provided. Can a similar assessment for the TPLM area for the viewpoints be readily provided? If so, please could that be done.
- 5. I have overlaid our simplistic modeling onto the images which were attached to my Evidence in Chief (Attachment AA). Use of this modeling exercise should be prefaced by the understanding that the modeling only represents proposed building heights and the edge of future urban development. This modeling does not represent density, recession planes, building form, height variation, future vegetation, gaps in buildings for road, paths or other design provisions in the TPLM Variation. Its use is limited to developing a better understanding, at a high level, from where development may be visible and at what potential scale. I have not excluded intervening vegetation between the viewpoint and the model and have only used landform to demonstrate the intervening screening features. I rely on the decision makers to make a judgment on how the intervening off-site vegetation, which is visible though the transparent building height representation graphic, may screen the TPLM variation area in the future.

Appendix B – Response to Glenpanel Development Limited Questions

With the refreshing of your memory as to your discussions with Mr Tylden, do you agree that you indicted verbally that you would be likely to be able to support 6-9 residential development lots on the "mid-slopes" of the ONF on the GDL land? [It is accepted that this was not a written, or fully formed opinion, but was just a preliminary one.]

- I never offered any such verbal support to Mr Tylden. In February of 2018 I prepared a memo responding to his proposal to relocate a building in the location of the existing small shed. In that memo I set out the sensitivity of the site and expressed that Mr Tylden's proposal for a single dwelling in the ONF would not be supportable from a landscape and visual effects perspective.
- I walked the site with Mr Tylden and I recall being apprehensive about Mr Tylden's ideas for the mid-slopes of Slope Hill. During our site visit I recited design solutions which I have successfully employed in other ONFs and ONLs, such as a subterranean houses, significant earthworks and bunds for mitigation, small cabins in regenerating natural forest, and other significant offset strategies such as land swaps and significant biodiversity enhancement. Mr Tylden wanted a typical rural living type development in the ONF, which I did not consider would be supportable.

Do you agree that:

- i. You previously supported, as an independent expert landscape architect, development on the toe of the slope as part of GDL's HASHA proposal?
 - 3. Yes, I supported development near the toe of Slope Hill, outside the Slope Hill ONF landscape category boundary. At the time of designing and assessing GDL's HASHA, I relied on the Council's Decisions Version of the ONF boundary line as recommended by the Hearings Panel, which was mapped by Landscape Architect Helen Mellsop and contained in her Landscape Evidence for Hearing Stream 14 of the Council's Proposed District Plan (PDP) review.¹ I reproduce the map in Ms Mellsop's Evidence (Figure 1) and the map I produced in the attachments to my landscape assessment report for GDL's HASHA proposal (Figure 2). My Landscape Assessment which formed part of the HASHA proposal stated that all proposed development would be below the ONF category boundary recommended by the Hearings Panel.²

¹ 28 May 2018 EIC Helen Mellsop Hearing Stream 14, Pages 12 – 20.

² Patch Landscape Assessment – Flints Park EOI Appendix E-Landscape Assessment 6 March 2019, part 2.15.

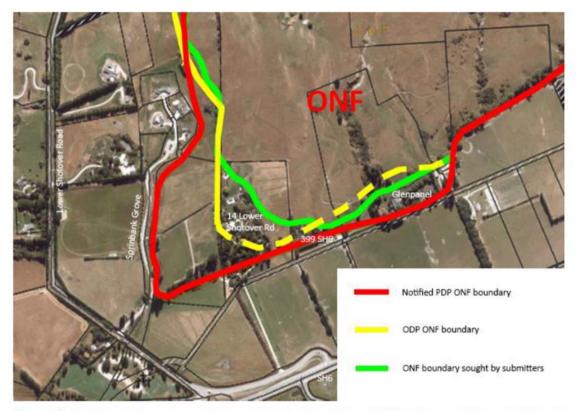


Figure 5: ONF boundaries on the south-west and west sides of Slope Hill. Boundary sought by submitters and recommended in this evidence in green.

Figure 1: Figure 5 of Helen Mellsop's EIC recommending the location of the Slope Hill ONF.

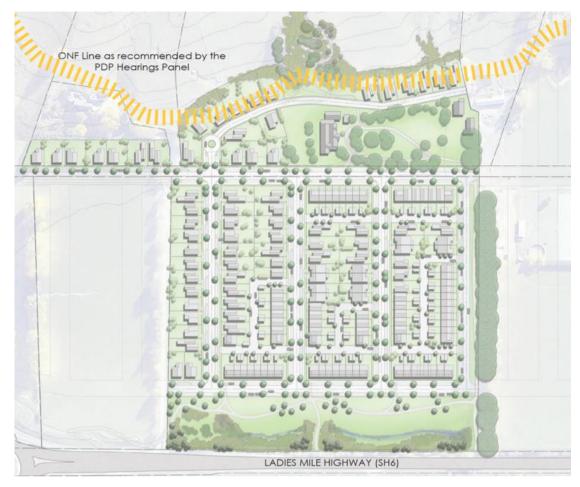


Figure 2: Patch graphic overlay of the Hearings Panel Topic 14 approved ONF category boundary and the GPD's HASHA proposal.

- ii. That development in fact included a significant number of buildings at the "toe" of the slope, within the current ONF line?
 - 4. Refer to my answer above. I did not support any development within the Slope Hill ONF as mapped at the time of preparing the HASHA proposal. I accept that the current PDP Slope Hill ONF category boundary is more refined and lower than the ONF line as mapped at the time of preparing GDL's HASHA proposal.
- iii. The extent of development that GDL is currently seeking to enable on the toe of the slope through a minor adjustment to the ONF line is similar to that which you had previously supported?
 - 5. Yes.

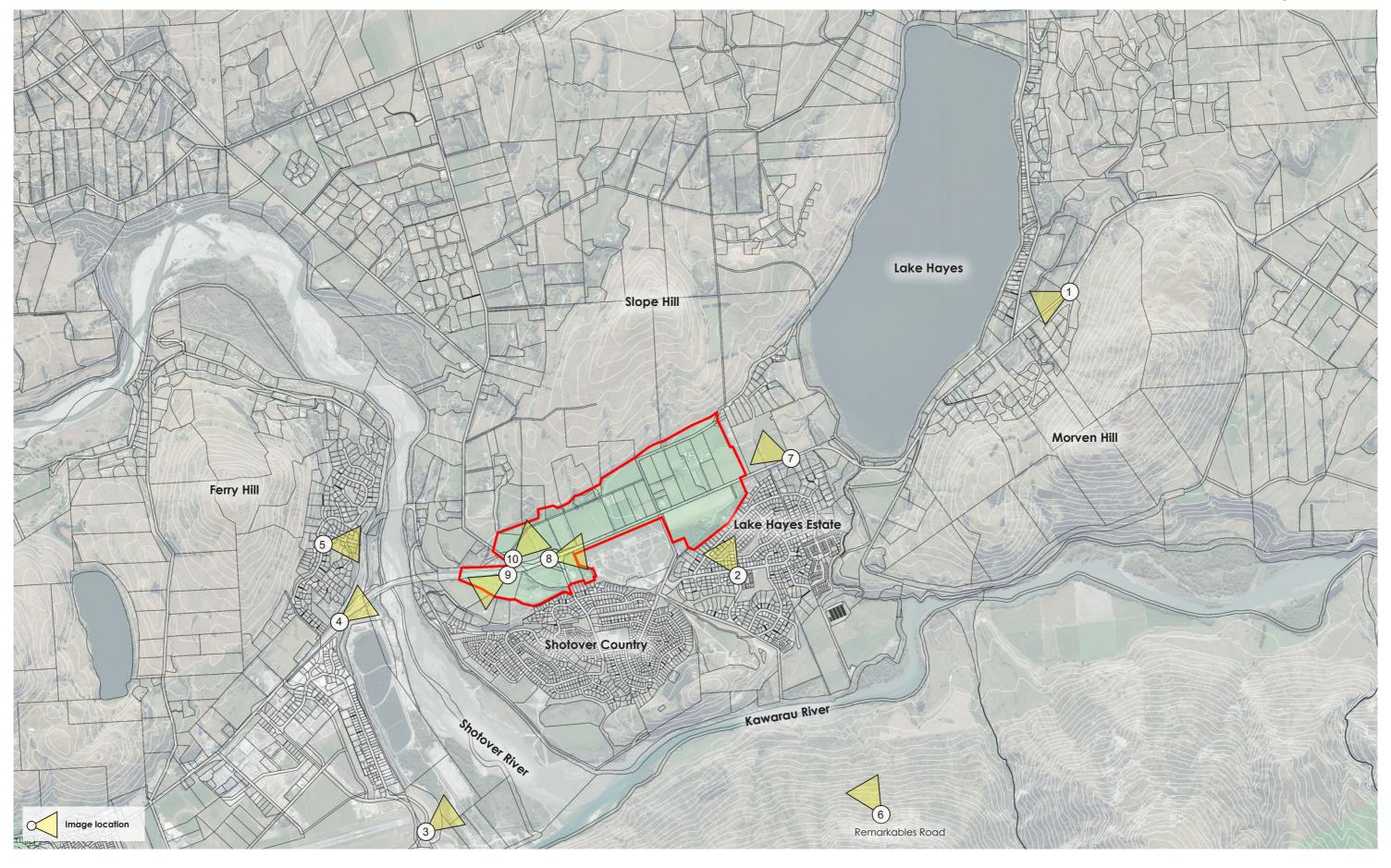
Attachment AA

Graphic Attachments

Te Pūtahi Ladies Mile Plan Variation

Evidence of Stephen Skelton







Reference: PA23744 IS05

Scale: 1:25,000 @ A3



Image 1A



25mm photo - 29 September 2023 at 11:41 am



Image 1B



Visual Simulation - Plan Change QLDC



Image 1C



Visual Simulation - Wire frame



Image 2A



25mm photo - 24 March 2021 at 11:38 am



Image 2B



Visual Simulation - Plan Change QLDC



Image 2C



Visual Simulation - Wire frame



Image 3A



25mm photo - 1 April 2021 at 12:20 pm



Image 3B



Visual Simulation - Plan Change QLDC



Image 3C



Visual Simulation - Plan Change QLDC and Submission 107



Image 3D



Visual Simulation - Wire frame



Image 4A



25mm photo - 1 April 2021 at 12:12 pm



Image 4B



Visual Simulation - Plan Change QLDC



Image 4C



Visual Simulation - Plan Change QLDC and Submission 107



Image 4D



Visual Simulation - Wire frame



Image 5A



50mm photo - 1 April 2020 at 11:52 am



Image 5B



Visual Simulation - Plan Change QLDC



Image 5C



Visual Simulation - Plan Change QLDC and Submission 107



Image 5D



Visual Simulation - Wire frame





Panorama - 29 September 2023 at 1:27 pm





Plan Change QLDC





Plan Change QLDC and Submission 107



Image 7A



25mm photo - 29 September 2023 at 11:48 am



Image 7B



Visual Simulation - Plan Change QLDC



Image 7C



Visual Simulation - Wire frame



Image 8A



25mm photo - 29 March 2021 at 6:59 pm



Image 8B



Visual Simulation - Plan Change QLDC and Submission 107



Image 8C



Visual Simulation - Wire frame



Image 9A



25mm photo - 29 September 2023 at 11:53 am



Image 9B



Visual Simulation - Plan Change QLDC



Image 9C



Visual Simulation - Wire frame



Image 10A



25mm photo - 24 March 2021 at 12:25 pm



Image 10B



Visual Simulation - Plan Change QLDC



Image 10C



Visual Simulation - Wire frame

