

**Before the Panel of Hearing Commissioners  
For the Queenstown Lakes Proposed District Plan**

**In the Matter** of the Resource Management Act  
1991  
**And**  
**In the Matter** of the Queenstown Lakes Proposed  
District Plan - Stage 2  
**And**  
**In the Matter** of Hearing Stream 14 - Wakatipu  
Basin

**Statement of Evidence of  
Stephen Russell Skelton  
for Burgess Duke Trust (Submitter 2591)  
and Ashford Trust (Submitter 2535)**

Dated: [13 June 2018]

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## INTRODUCTION

### Qualifications and Experience

1. My name is Stephen Russell Skelton. I have 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 am the Director of Patch Limited (Patch), a landscape architecture and landscape planning consultancy based in Queenstown. I am a registered member of the New Zealand Institute of Landscape Architects and the acting chairman of the Southern Branch.
2. I have been involved in landscape consultancy work in the Queenstown Lakes District for over 5 years, working in both the public and private sector. I held the position of landscape planner with Lakes Environmental before it was absorbed by the Queenstown Lakes District Council (QLDC) in 2013. I then held the position of landscape architect at Baxter Design in Queenstown. I founded Patch in June 2016 and my work has included all facets of landscape architecture and landscape planning through the range of small and large-scale projects. My work includes master planning, commercial and residential landscape design, preparation of native restoration planting plans, preparation of landscape management plans and preparation of landscape assessments for resource consent applications.
3. I am professionally familiar with the values of the Wakatipu Basin. I have lived in the District for 8 years and have witnessed the Wakatipu Basin through all seasonal, diurnal and climatic variations. I am an avid mountain climber and paraglider and I have viewed the Wakatipu Basin from almost all the surrounding mountain summits and slopes and from the air. I have walked or cycled most of the Queenstown Trail. I have driven all the publicly accessible roads within the Wakatipu Basin. I have a professional and intimate understanding of the basin's landscape and visual amenity values.
4. I have read and understand the Strategic Direction of the Proposed District Plan and the Objectives and Policies, especially those contained within the Rural, Landscape and Wakatipu Basin chapters.

## CODE OF CONDUCT

5. I confirm that I have read the Code of Conduct for Expert Witnesses as contained in the Environment Court Practice Note dated 1 December 2014. I agree to comply with this Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## SCOPE OF EVIDENCE

6. I have been asked by the Burgess Duke Trust (Submitter 2591) and Ashford Trust (Submitter 2535) to prepare landscape evidence with regards to the land east of Lower Shotover Road, which is sought to be included as part of the Wakatipu Lifestyle Precinct (**Attachment A**)<sup>1</sup>. My evidence will deal with the following:
- (a) The appropriateness of the Landscape Character Unit (**LCU**) boundaries and the description of Hawthorn Triangle (LCU 9) and Slope Hill Foothills (LCU 11) as defined in Chapter 24, Schedule 24.8 of the PDP;
  - (b) The evidence of Landscape architect Bridget Gilbert dated 28 May 2018. I will focus on areas of where our opinions differ, including:
    - (i) The boundaries of LCU 9;
    - (ii) The site's visual and character connection to the Slope Hill ONF;
    - (iii) The defensibility of the LCU boundary between the notified LCU 9 and LCU 11.
  - (c) Following this discussion I will provide recommendations and a conclusion.

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<sup>1</sup> For the purpose of my evidence I refer to the 'subject site' or the 'site' as being all the land shown in **Attachment A** to the east of Lower Shotover Road sought to be zoned WLP.

## LANDSCAPE BOUNDARIES

7. The Hawthorn Triangle (**the Triangle**) is widely known to be the land bound by Domain Road to the west, Lower Shotover Road to the east and Speargrass Flat Road to the north. It was categorised as an Other Rural Landscape (**ORL**, the only ORL in the Wakatipu Basin) in the ODP. It has been identified as LCU 9 in the Wakatipu Basin Land Use Planning Study 2017 (**WBLs**) and similarly was identified by Dr Marion Read in her assessment of the basin's LCUs<sup>2</sup> (**Attachment B**). Notably Dr Read identified a separate LCU adjacent to the Triangle she called the Hawthorn Triangle Margins LCU 25.
8. The Triangle's surrounding roads have been used as the LCU boundaries in the WBLs. A major justification for this is the hawthorn hedge which almost completely ring fences the Triangle. I note a hawthorn hedge also exists on the other side of parts of Speargrass Flat Road and most of Lower Shotover Road.
9. When defining the delineation between landscapes and features, it is best practice<sup>3</sup> to give preference to geophysical boundary types, such as topography and vegetation patterns. Where no geophysical boundary exists, socio-physical boundary types such as roads or hedges can be used. Given the absence of either boundary type, a socio-physical boundary, such as a cadastral boundary or planning zone can be used. Socio-physical boundary types generally unperceivable.
10. I also note when using a landform such as a ridge or a hill as a geophysical boundary it is preferable to site the boundary at the top of the feature.
11. I understand the WBLs sought to use geomorphological boundaries wherever practical, however in the case of the Triangle the WBLs used a social-physical boundary to delineate the boundary between LCU 9 and LCU 11. I consider this approach, in this area to be flawed.

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<sup>2</sup>Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features, Read 2014

<sup>3</sup> Methodological Approach, Identification of Outstanding Natural Features and Landscapes, Otorohanga District Plan, 15 August 2015, page 16.

12. The Hawthorn Triangle is only known as 'The Triangle' by the roads which run across it. These roads are a human response to the landscape's more impassable geomorphological features, namely its western edge at the Shotover River and its eastern edge at Slope Hill. Lower Shotover Road and Domain Road mark two north - south corridors converging near where the western toe of Slope Hill meets the Old Lower Shotover Bridge. These roads diverge to the north providing access to north-eastern and north-western lands. This pattern is a human response to the landform.
13. I consider geomorphological landscape boundaries are the most appropriate boundaries to delineate the Hawthorn Triangle Landscape (not LCU)<sup>4</sup> and I attach my interpretation of this wider landscape (**Attachment C**). I note that this interpretation of the landscape, more or less takes in the areas identified by Dr Read as the Hawthorn Triangle (LCU 9), Hawthorn Triangle Margin (LCU 25), the North Hawthorn Triangle (LCU 11), the western edges of the Speargrass Flat (LCU 12) and North Slope Hill (LCU 10). Similarly it takes in much of what the WBLs identified as the Domain Road River Terrace (LCU 7), The Slope Hill Foothills (LCU 11) and Speargrass Flat (LCU 8) (**Attachment D**).
14. While I consider the Triangle to be part of a larger landscape, there are certainly different LCUs within the Hawthorn Landscape. For example the lands north of Speargrass Flat Road are characterised by open pastoral slopes and relatively void of built form. I consider the Hawthorn Landscape contains two distinct LCU's:
- (a) The northern pastoral lands which are not dominated by built form. I consider these part of their own LCU I call the *Hunter Road Hinterland* while the WBLs includes these pastoral lands within the Speargrass Flats LCU 8.
  - (b) The more southerly rural living areas bound between the Slope Hill 'Foothills'.

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<sup>4</sup> Environment Court Decisions C73/2002 paragraph 20 and C203/2004 paragraph 29. Which states that the minimum characteristics of a landscape are that:

- *It must contain at least one (preferably more) rectangle with at least 1.5 x 2 km sides;*
- *No part of the landscape may be more than 1 km from such a rectangle;*
- *It must contain a minimum area of 600 ha and*
- *Internal corners should be rounded.*

15. I provide my interpretation of the LCU's within the Hawthorn Landscape in **Attachment E**.
16. The subject submissions concerns the land east of Lower Shotover Road. Part of this land was identified by Dr Read as being the Hawthorn Triangle Margins (Read's LCU 25) and the balance to be part of the North Slope Hill Foothills (Read's LCU 10). The WBLs and Ms Gilbert has identified all of the site to be part of the Slope Hill 'Foothills' (LCU 11). It is understood that the main justification for the site being separated from the Hawthorne Triangle (LCU 9) is that existing development patterns contained within the three roads that form a triangle are different than those outside of the triangle, and that the hawthorn hedge forms the a logical separation of characters between the site and the Triangle. I do not agree and consider this approach is flawed for the following reasons:
  - (a) The flatter portion of land between the Slope Hill Foothills Ridge and the Lower Shotover Road are largely part of the same geological make up (Loess/Alluvium) (**Attachment F**);
  - (b) There is a legible geomorphological boundary east of Lower Shotover Road (what I have called 'The Slope Hill Foothills Ridge') and the Slope Hill ONL (**Attachment G**);
  - (c) The Lower Shotover Road is predominantly lined with a hawthorn hedge on both sides;
  - (d) While residential density is marginally higher to the west of Lower Shotover Road, the landscape character effects of development, renders a rural living character throughout all of the Lower Shotover Road corridor;
  - (e) The land between the Slope Hill Foothills Ridge and Lower Shotover Road has very limited visual connection with the more elevated plateau which characterises the Slope Hill Foothills.
17. For these reasons, I consider that the site is more closely associated with the Hawthorn Landscape than the Slope Hill Foothills LCU (11).

**EVIDENCE OF BRIDGET GILBERT**

18. Ms Gilbert prepared the landscape component of the WBLS and assisted in the development of the landscape related provisions contained within the Wakatipu Basin Chapter 24 of the PDP. In terms of the wider breadth of her Statement of Evidence dated 28 May 2018, I agree on the following:
- (a) The Wakatipu Basin is an RMA s7(c) Amenity Landscape; and
  - (b) The landscape character and amenity values of the Wakatipu Basin do not derive predominantly from rural productive / agricultural land use.
19. In terms of Ms Gilbert's response to the submission concerning the site, I agree on the following:
- (a) A reasonable level of rural residential development has occurred throughout the area;
  - (b) Such development is reasonably well integrated into the landscape;
  - (c) Additional rural residential development may be acceptable within this area; and
  - (d) Vegetation patterning serves to screen and filter views of buildings from the visual catchment to the west and north.
20. I will address area where Ms Gilbert's opinion differs to that of my own in detail below. It is my interpretation that the primary areas of disagreement between Ms Gilbert's considerations and my own are:
- (a) Ms Gilbert considers the site is part of the Slope Hill Foothills LCU 11;
  - (b) Ms Gilbert considers that the site reads as an important part of the Slope Hill ONF which is perceivable from wider views of the basin, making it highly sensitive to visual change;
  - (c) Ms Gilbert considers that the Rural Lifestyle zoning proposed in Stage 1 of the PDP does not follow any defensible geomorphological, vegetation, land use or cadastral boundary and the hawthorn hedge



on the west side of Lower Shotover Road is the most defensible edge to the Hawthorn Triangle LCU 9.

#### *Landscape Character Units*

21. For the reasons set out above in the 'Landscape Boundaries' portion of my evidence I consider the site is more in character with LCU 9 than LCU 11. I consider the descriptions set out in Schedule 24.8 of the PDP for LCU 11 more accurately described the values of the lands east of the Slope Hill Foothills Ridge and north of the Slope Hill ONF than the values of the site. Most of these values are not applicable to the site including:

*Landscape patterning, Hydrology, Settlement patterns, Proximity to key route, Visibility/prominence, Enclosure/openness, Complexity, Sense of place, Potential landscape opportunities and benefits associated with additional development, Environmental characteristics and visual amenity values to be maintained and enhanced and Capability to absorb additional development.*

22. I consider the site is more closely aligned with the values described in Schedule 24.8 for LCU 9.

#### *Effects on the Slope Hill ONF*

23. Ms Gilbert places a high degree of emphasis that the site reads as an important part of the Slope Hill ONF context from views of the wider basin. For this reason, she considers it is highly sensitive to change<sup>5</sup>. After reading Ms Gilbert's evidence I undertook an additional site visit on the 29<sup>th</sup> of May, when trees were without leaf, to determine where the site was visible to a degree that it formed an important part of the Slope Hill ONF.
24. I visited the public places north, west and south of the site including the Fitzpatrick Basin (**Image 1**), Domain Road (**Image 2**), State Highway 6 (**Image 3**) and the areas around Quail Rise and Tuckers Beach (**Image 4**). From these more distant locations I consider that the low lying nature of the site, combined with its foreground of rural residential development and associated vegetation, was barely visible and not a legible part of distant views of Slope Hill. I consider any additional development on the site would

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<sup>5</sup> Part 36.5

result in a negligible<sup>6</sup> adverse effect on the visual coherence of the Slope Hill ONF.

25. The site does however form part of views towards Slope Hill as experienced from within parts of the Hunter Road/Lower Shotover Road corridor. From elevated parts of Hunter Road near the Speargrass Flat Road junction, the site will be visible in the foreground to views of Slope Hill and the more distant Remarkables ONL (**Image 5**). I do not consider that additional development below the Slope Hill Foothills Ridge on his northern portion of the site would adversely effect the appreciation of these outstanding landscapes.
26. For of the northern 670m portion of Lower Shotover Road between the Speargrass Flat Road junction and the Warren site (**Attachment E**) there are no views of Slope Hill as the Lower Shotover Road corridor is densely vegetated on both sides (**Images 6 and 7**).
27. At the north-western corner of the Warren site there is a break in the dense vegetation corridor and a brief, filtered view is available across the open character of the Warren and Greenslade sites towards Slope Hill (**Image 8**). The hawthorn hedge along Lower Shotover Road's eastern boundary across a 400m long portion of road which abuts the Warren and Greenslade sites is not dense, is in seemingly poor health and does not subscribe to the otherwise unbroken enclosed road corridor character of the balance of Lower Shotover Road. From this portion of Lower Shotover Road, Slope Hill is visible, although farther south it becomes more and more in the periphery of view (**Image 9**). I consider additional residential development on the site along this 400m long portion of land would adversely affect the visual appreciation of Slope Hill to a very low degree. This open land does not significantly contribute to the open character of the Slope Hill ONF and views across the site towards the ONF are not particularly memorable<sup>7</sup>.

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<sup>6</sup> Based on the 7-point scale recommended in the *NZILA 6.0 Practice Support Documentation, Best Practice Note, Landscape Assessment and Sustainable Management 10.1*, (02/11/10). The scale is: Extreme, very high, high, moderate, low, very low, negligible.

<sup>7</sup> The Statement of Evidence of Helen Mellsop dated 28 May 2018 provides a useful description of Slope Hill's values. In part 6.9 (d) of her evidence she describes the shared and recognised scenic values of Slope Hill as being particularly appreciated from SH6 west of the Shotover River, Ladies Mile and the Lake Hayes Area. I agree and would also include views from parts of Slope Hill Road.

28. Farther south along Lower Shotover Road the corridor is enclosed by dense vegetation and the values of Slope Hill is not readily appreciable (**Image 10, 11, 12 and 13**).
29. The experiential and visual quality of the Lower Shotover Road corridor is dominated by the more distant views of Coronet Peak to the north (**Image 14**) and the Remarkables to the south (**Image 15**).
30. I disagree with Ms Gilbert that the site reads as an important part of the Slope Hill ONF context in views from the wider basin and is therefore highly sensitive to change. I consider that rural living type development on and near the Warren and Greenslade site would have a very low adverse effect on the amenity and character of the ONF. I consider that the ONF values of Slope Hill are more readily and appreciated from other locations where the bulk of the feature and its typical *rôche moutonnée* glacial landform is more legible (see footnote 7 above).
31. I also consider that from Lower Shotover Road, the visual amenity is embodied in the vegetative enclosure of the road corridor which frames views to the distant ONL mountains. This corridor is predominantly bound by a rural living type development on both sides,
32. On a separate but related point I note that the WBLs Final Report, Table 1 rates the Domain Road River Terrace LCU 7 has a high capacity to absorb change. Table 2: *Key Landscape Character Finding* either omits to consider or fails to recognise the highly valued, shared and recognised views available from near the Domain Road, Lower Shotover Road intersection to the west and north. The openness of the upper lands west of and adjacent to Domain Road in this location allow memorable public views towards many of the Basin ONLs and ONF including the Shotover River and Ferry Hill (**Image 16**). I consider this is a significant shortcoming in the WBLs's assessment of LCU values.

*Defensibility of 'Slope Hill Ridge' as a Landscape Boundary*

33. Ms Gilbert considers that the Rural Lifestyle Zone which was notified in Stage 1 did not follow any legible geomorphological, vegetation, land use or cadastral boundaries.<sup>8</sup> Furthermore, she considers that relying on the

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<sup>8</sup> Part 36.9

patterning of residential development to inform the extent of zoning is methodologically flawed as it ignores other aspects such as landform.<sup>9</sup> I have read all of her evidence and have found in at least one other instance, she has concluded that a marked change in land use patterning (the northern boundary of LCU 9, in tandem with a hedge) displays a clearly legible and defensible edge.<sup>10</sup> I find her logic for locating and disputing LCU boundaries inconsistent, and in at least the matter of LCU 9, inconsistent and contradictory.

34. I strongly disagree with Ms Gilbert that the Rural Lifestyle zone followed an arbitrary line and relied simply on the existing pattern of rural residential development to inform the extent of future residential zoning on the site.<sup>11</sup> I have read Dr Read's Landscape Character Assessment (2014) and her recommendations and justifications which I understand, largely lead to the proposed Stage 1 rezoning of the site to Rural Lifestyle (**Attachment H**). Dr Read considered that the rezoning of the site to Rural Lifestyle would acknowledged the level of development in the area. She considered that the Rural Lifestyle zone could extend up to approximately the 400m contour in the area north of Slope Hill Road (approximately to the feature I have called the Slope Hill Foothills Ridge) rising to around the 420m contour south of Slope Hill Road.<sup>12</sup>
35. To better understand the landform associated with Slope Hill Foothills Ridge and the transition between the ONF and amenity lands I have modelled much of the land east of Lower Shotover Road in 3D using Council's Lidar 1m contours (**Attachment G**). In undertaking this work I found that Dr Read's assessment that the 400m contour north of Slope Hill Road presented a marked change in landform was accurate. South of Slope Hill Road this contour meets a subtle gully landform to the south, climbing to near the 420m contour to meet the Slope Hill ONF boundary. I consider the line shown on my attachments most accurately represents the geophysical boundary between the Slope Hill 'Foothills' LCU 11 and the Hawthorn Triangle LCU 9.

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<sup>9</sup> Part 36.10

<sup>10</sup> Part 27.9

<sup>11</sup> Part 36.10

<sup>12</sup> Page 8

## RECOMENDATIONS

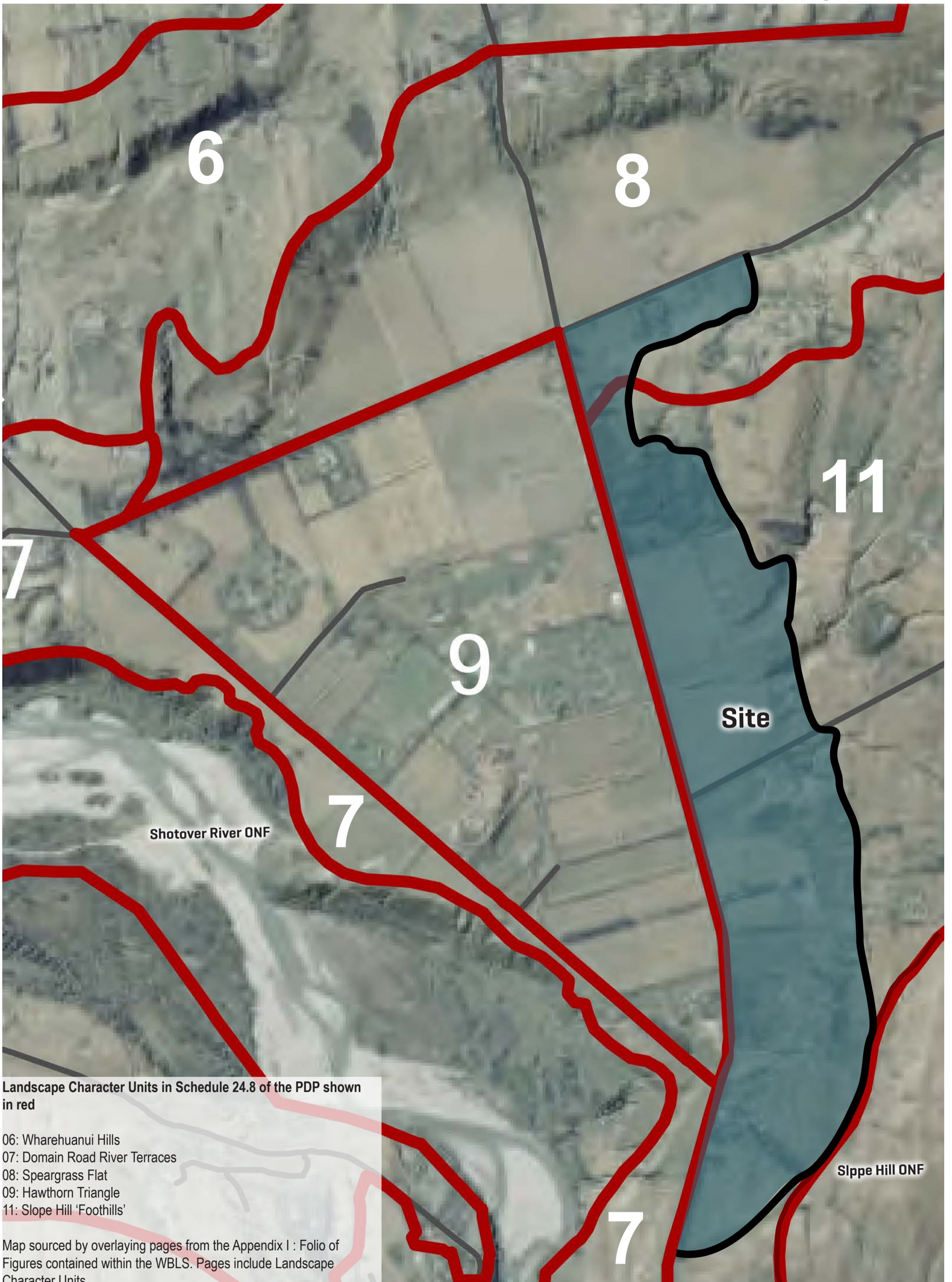
36. Following on from the assessment undertaken above, I recommend the following:
- (a) The land east Lower Shotover Road as shown in **Attachment I** be rezoned Wakatipu Lifestyle Precinct;
  - (b) A minimum setback of 50m should be applied to both sides of the LCU boundary between LCU 9 and LCU 11 structures will not break the skyline or encroach on the ridge feature;
  - (c) A portion of the land west of Domain Road, south of where the Queenstown Trail enters the Triangle and north of the property at 139 Lower Shotover Road should be removed from the Wakatipu Lifestyle Precinct and the land level with the road shall be kept free of buildings, vegetation or other elements which may obstruct views from the road across the Shotover River ONF and the wider, westerly portion of the Wakatipu Basin.



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Stephen Russell Skelton.

{13 June 2018}



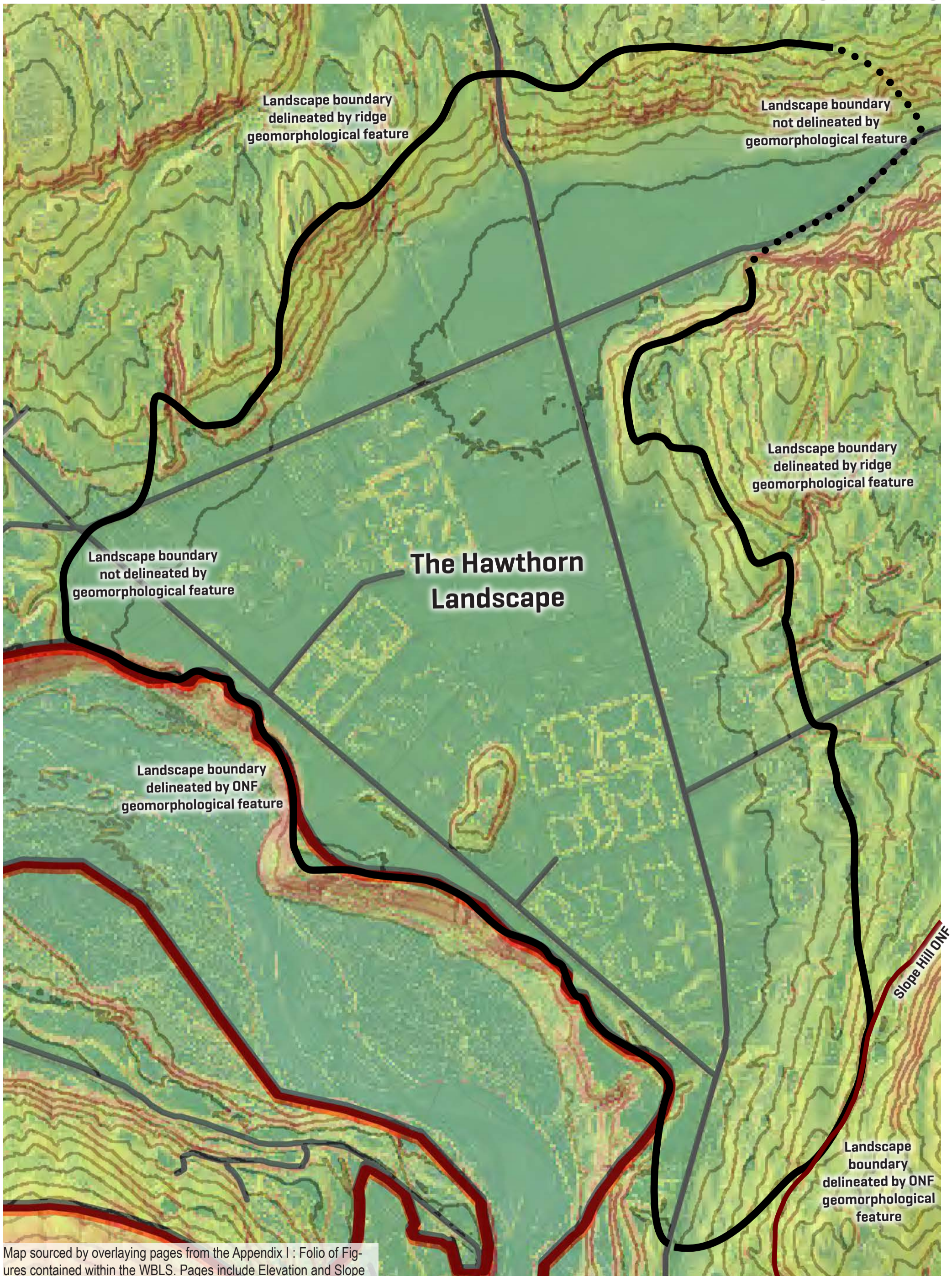
Landscape Character Units in Schedule 24.8 of the PDP shown in red

- 06: Wharehuanui Hills
- 07: Domain Road River Terraces
- 08: Speargrass Flat
- 09: Hawthorn Triangle
- 11: Slope Hill 'Foothills'

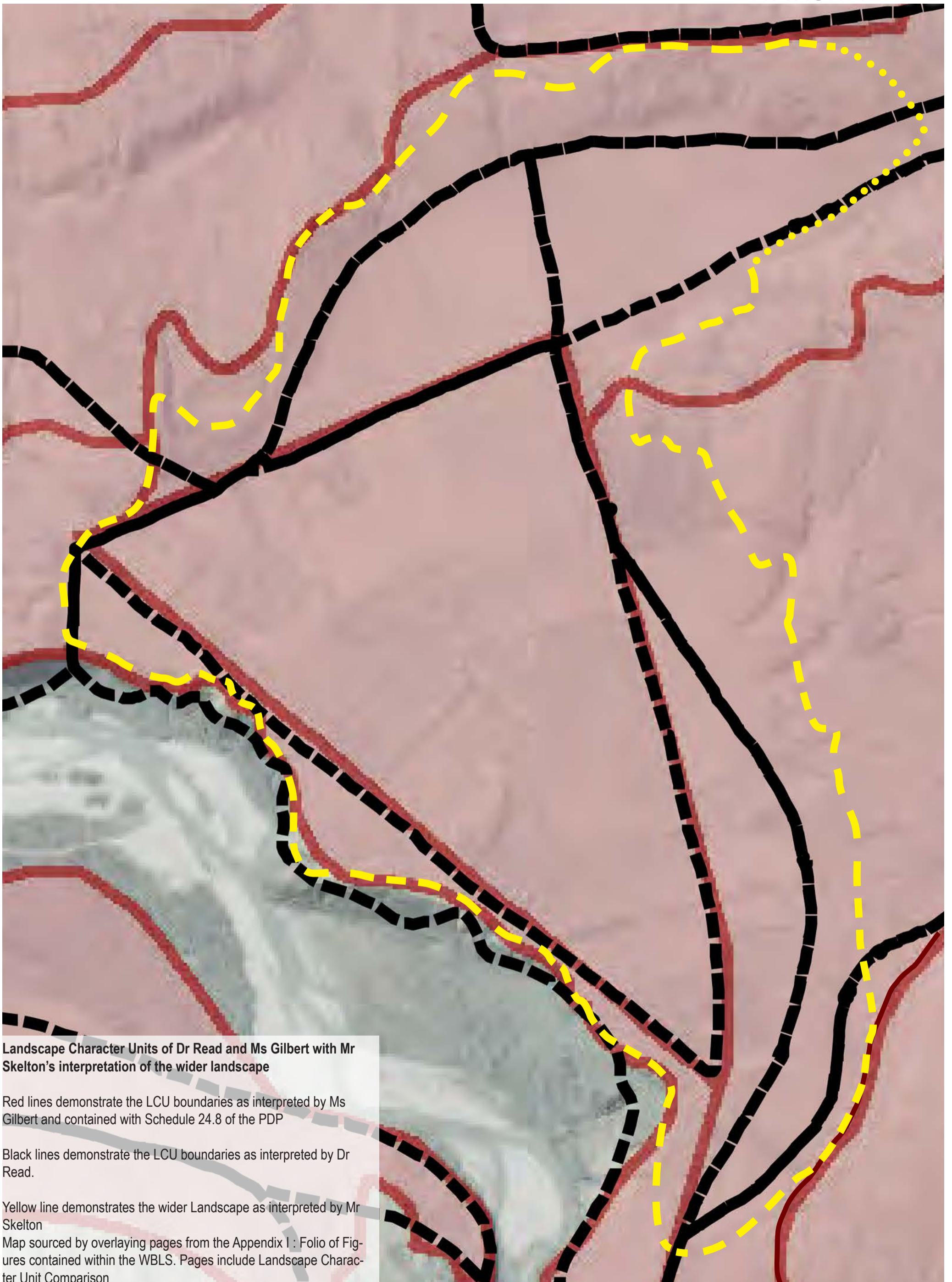
Map sourced by overlaying pages from the Appendix I : Folio of Figures contained within the WBL. Pages include Landscape Character Units.











**Landscape Character Units of Dr Read and Ms Gilbert with Mr Skelton's interpretation of the wider landscape**

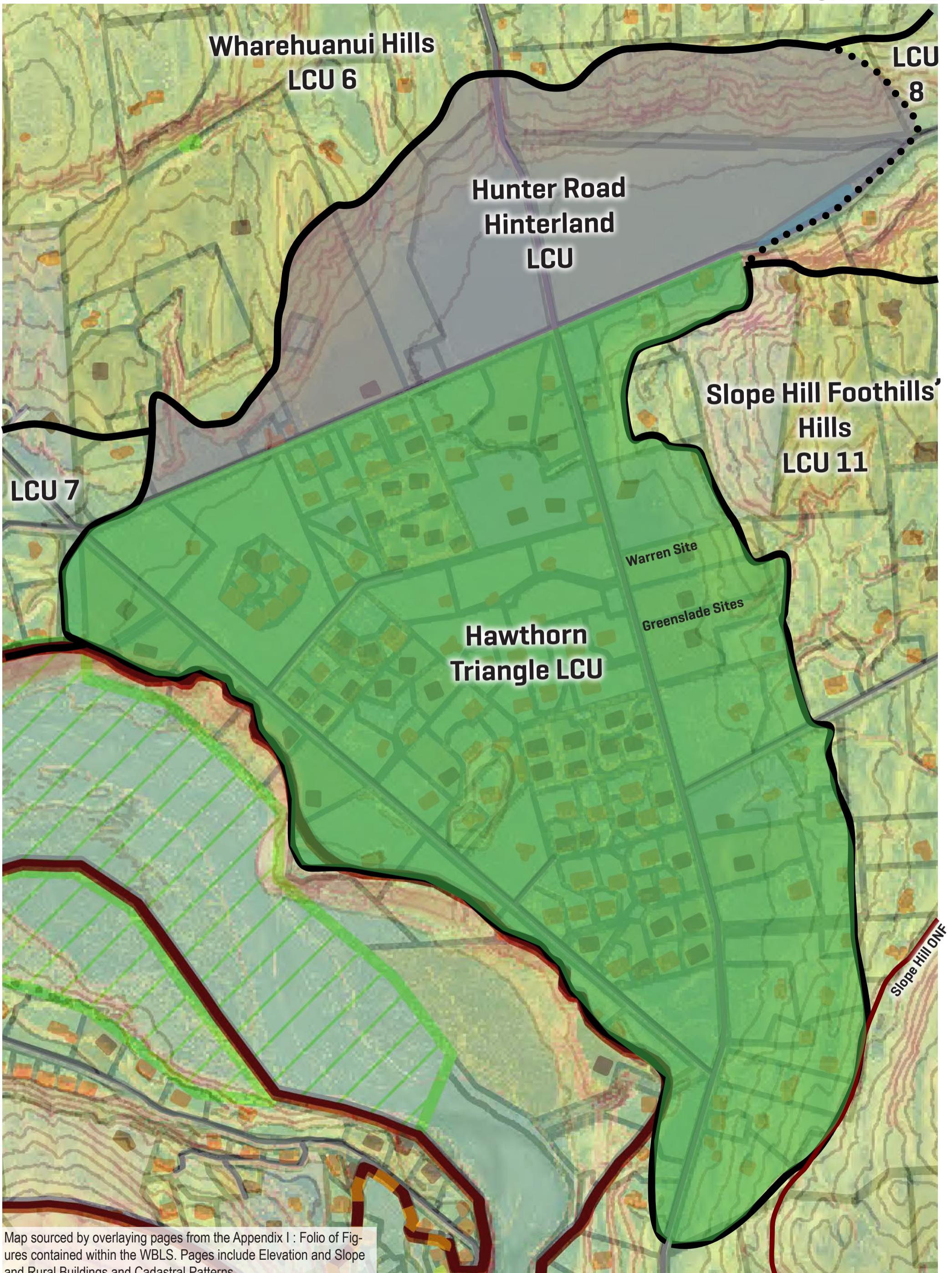
Red lines demonstrate the LCU boundaries as interpreted by Ms Gilbert and contained with Schedule 24.8 of the PDP

Black lines demonstrate the LCU boundaries as interpreted by Dr Read.

Yellow line demonstrates the wider Landscape as interpreted by Mr Skelton

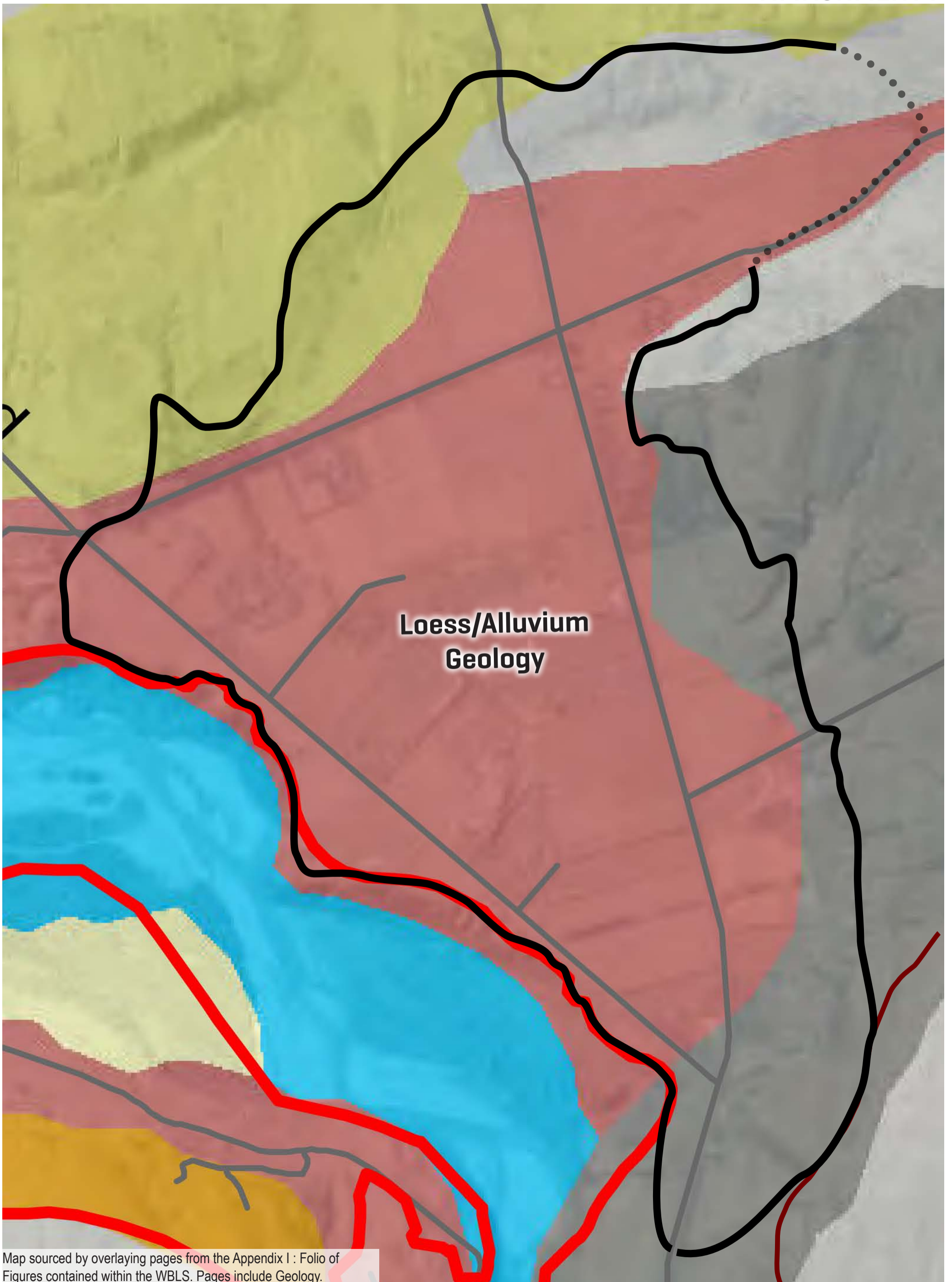
Map sourced by overlaying pages from the Appendix I : Folio of Figures contained within the WBSL. Pages include Landscape Character Unit Comparison





Map sourced by overlaying pages from the Appendix I : Folio of Figures contained within the WBSL. Pages include Elevation and Slope and Rural Buildings and Cadastral Patterns.





Map sourced by overlaying pages from the Appendix I : Folio of Figures contained within the WBS. Pages include Geology.



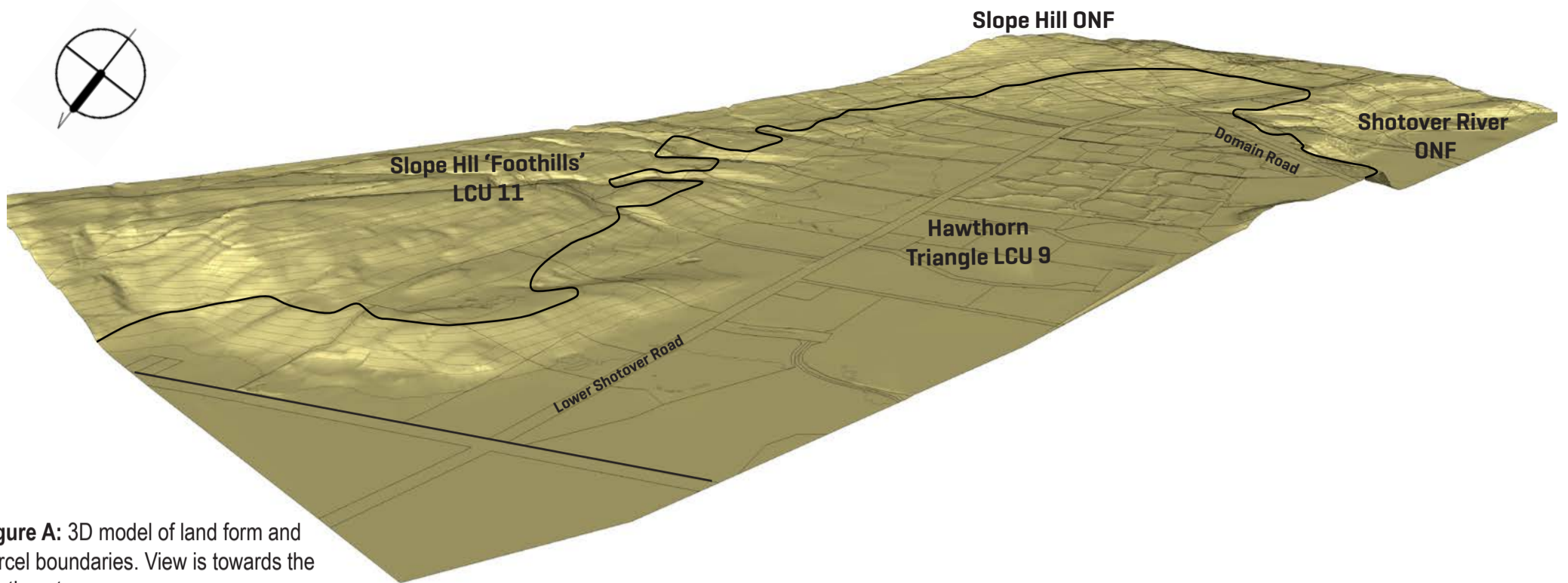


Figure A: 3D model of land form and parcel boundaries. View is towards the southeast.



Figure B: Image and interpretation of the Slope Hill 'Foothills' Ridge ridge line as viewed from Lower Shotover Road (see image 9 for location).

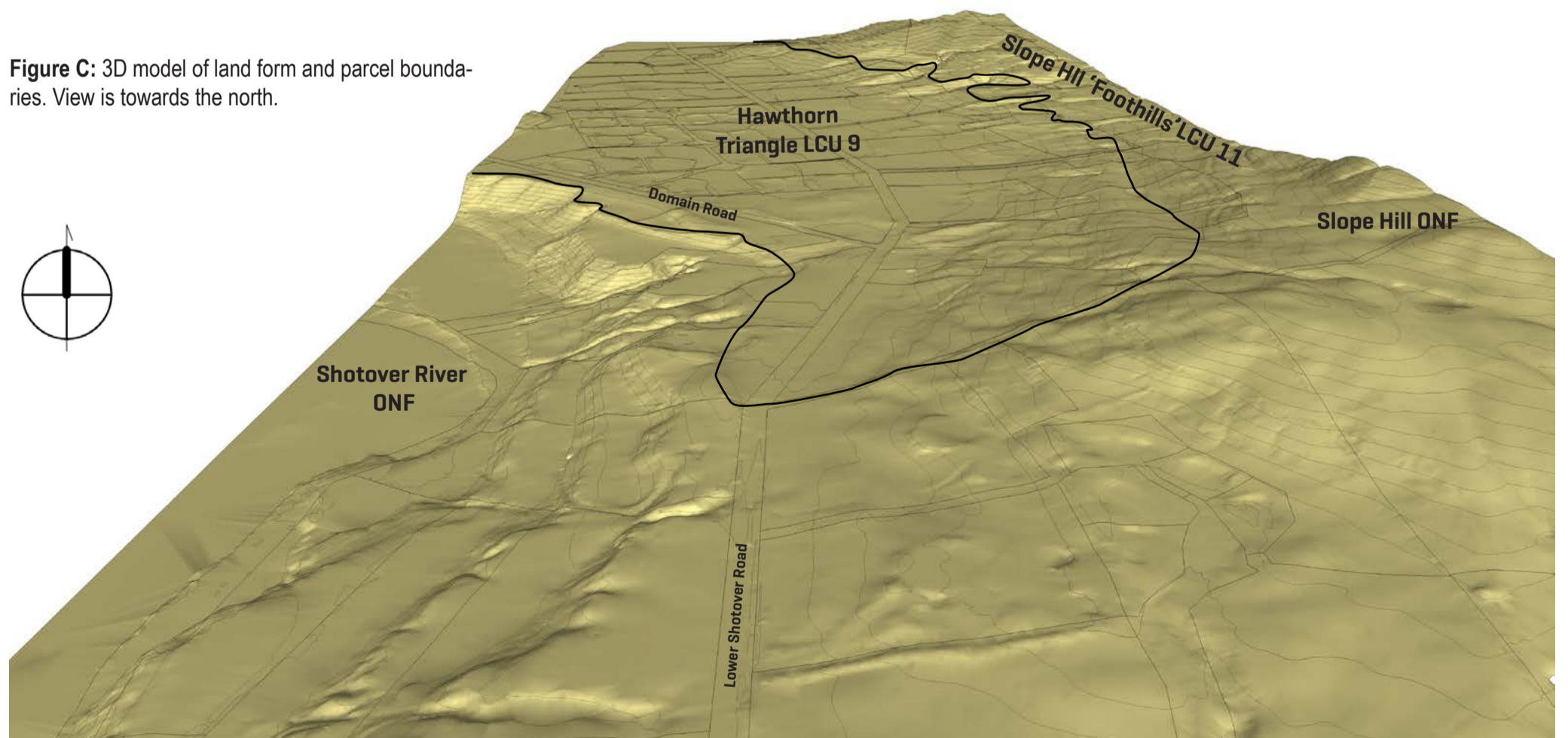
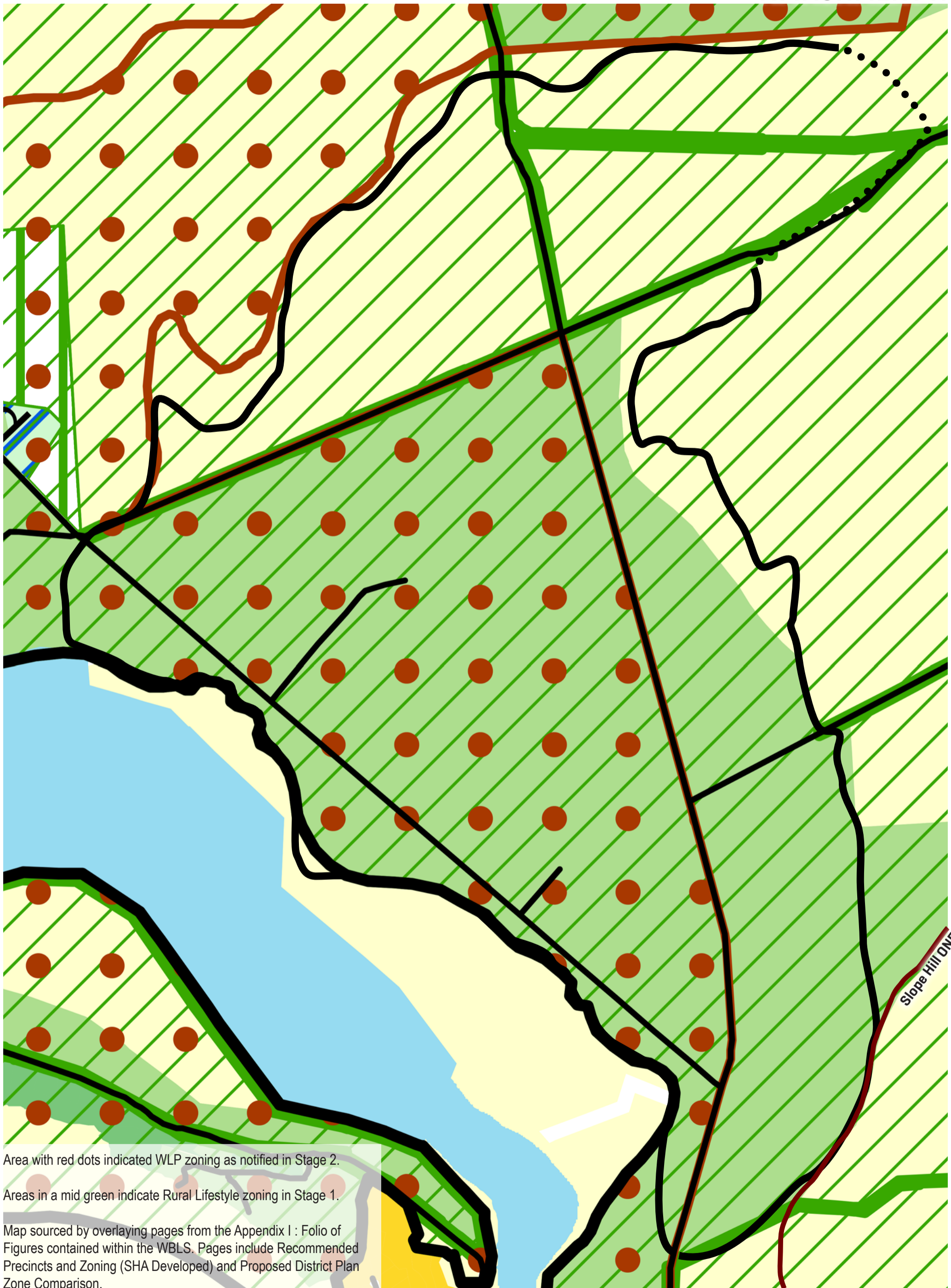
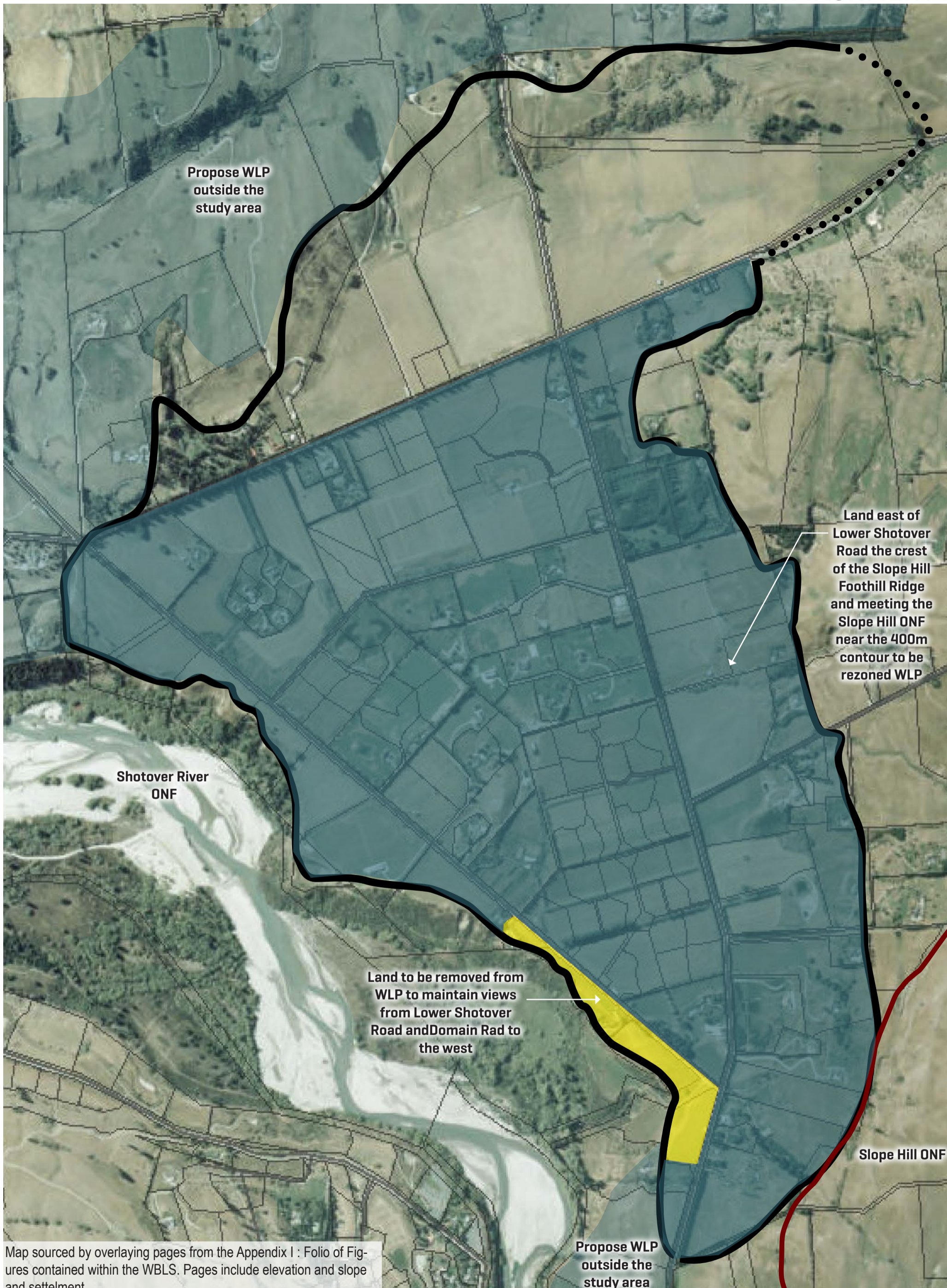


Figure C: 3D model of land form and parcel boundaries. View is towards the north.





Map sourced by overlaying pages from the Appendix I : Folio of Figures contained within the WBLs. Pages include elevation and slope and settlement.

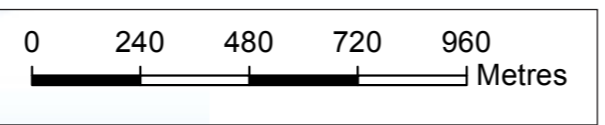




4 Image locations



Landscape - Reference : PA18171 IS03





View from Fitzpatrick Road looking east. Image is a single photograph taken on 29 May 2018 at 3:40pm.





View from Domain Road looking east. Image is a single photograph taken on 29 May 2018 at 3:45pm.



View from State Highway 6 Road looking east. Image is a single photograph taken on 29 May 2018 at 4:34pm.



View from Stowmore Lane (Quail Rise) looking east. Image is a single photograph taken on 29 May 2018 at 4:23pm.



View from Hunter Road looking south. Image is a single photograph taken on 29 May 2018 at 3:50pm.



View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 3:54pm.



View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 3:56pm.



View from Lower Shotover Road looking south - southeast. Image is a composite of three photograph taken on 29 May 2018 at 3:59pm.



View from Lower Shotover Road looking south - southeast. Image is a composite of seven photograph taken on 29 May 2018 at 4:03pm.





View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 4:07pm.



View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 4:09pm.



View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 4:12pm.



View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 4:15pm.



View from Lower Shotover Road looking north. Image is a single photograph taken on 29 May 2018 at 4:11pm.



View from Lower Shotover Road looking south. Image is a single photograph taken on 29 May 2018 at 4:09pm.



View from Lower Shotover Road looking south west to north west. Image is a panoramic photograph taken on 22 February 2018 at 2:39pm.