

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act ('Act')

AND

IN THE MATTER of the submission by Bridesdale Farm Developments Limited on the QLDC Proposed District Plan (Stream 14) Wakatipu Basin

STATEMENT OF EVIDENCE OF STEPHEN SKELTON FOR

Bridesdale Farm Developments Limited

SO655 – Bridesdale - T14 – Skelton S. - Evidence

13th June 2018



INTRODUCTION

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 relevant to this submission, especially those contained with the Rural, Landscape and Wakatipu Basin chapters.
5. While this matter is not before the Environment Court, I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. I



have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

6. I have been asked by Bridesdale Farm Developments Limited to provide evidence which assesses the landscape and visual amenity effects of parts of the Submission #655 which relates to the Bridesdale Land (the site) (**Attachment A**). The following evidence provides:
- A description of the submission;
 - Commentary on the evidence of Landscape Architect Helen Mellsop;
 - An assessment of the landscape category boundary;
 - An assessment of the proposed rezoning if the site;
 - Recommendations;
 - Conclusion.

DESCRIPTION OF THE SUBMISSION

7. The submission seeks to:
- Amend the zoning of the site to Medium Density Residential (MDR);
 - Amend the Planning Map to remove the Urban Growth Boundary (UGB);
or
 - Reposition the UGB to include all of the site;
 - Amend the Planning Map so that the landscape category boundary is located on the true left of the Kowarau River;
 - Amend related provisions contained in the Proposed District Plan (PDP).
8. My evidence only concerns the landscape category boundary and small part of the MDR rezoning aspects of the submission. I assume the location of the UGB will be consequential upon the MDR zoning so I do not address that further.

EVIDENCE OF HELEN MELLOP

Outstanding Natural Landscape

9. Ms Mellsop prepared a Statement of Evidence in the matter of *Hearing Stream 14: Wakatipu Basin hearing and transferring Stage 1 submission related to Arrowtown*

and Lake Hayes dated 28 May 2018. As part of her evidence she provided landscape evidence with regard to submission 655, including an assessment of the proposal to relocate the ONL and to rezone parts of the land. In terms of Ms Mellsop's ONL evidence, I agree on the following:

- The Bridesdale land above Kawarau River Escarpment (the escarpment) has been developed as a medium density urban area;¹
- Since the approval of SH15001, the escarpment has been modified by earthworks, roading and native planting;
- Since the approval of SH15001, the land below the escarpment (the river flats) has been modified by earthworks, stormwater ponds and a rectilinear pattern of roads and allotments;
- The above modifications have undermined the legibility and expressiveness of the river valley landscape to some extent and reduced its natural character.²

10. Similarly, I consider since the approval of SH15001 the following additional factors have undermined the legibility and expressiveness and reduced the natural character of the escarpment and river flats:

- Prior to the approval of SH15001, the escarpment supported a mature stand of eucalyptus trees and swathes of native grey scrubland which have since been removed;
- The upper edge of the escarpment no longer forms a ridgeline. Now, a pattern of no less than 10 gabled roofs and building elevations form the ridgeline (**Image 1**);
- The allotment area near the base of the escarpment is 1.2ha in area and each allotment is permitted to have a 10m² or 20m² shed with a height of 2.5m.

11. In her evidence, Ms Mellsop cites the conclusions she made in her ONL assessment for SH15001. While her historical account remains applicable, I do not consider this 2015 assessment appropriately describes the existing situation on the river flats and escarpment.

¹ Part 6.28

² Part 6.29

12. Ms Mellsop recognises the proposed Informal Recreation Reserve zoning on the site west of the Bridesdale land below the escarpment. She does not consider this zoning will result in a significant adverse effect on the natural character and states that recreation facilities or buildings in this area are discretionary activities. She considers that as a consequence of this discretionary, regime no activities in the reserve land will result in significant adverse effects on natural character. However she does not refer to the Recreation Reserve Designation (in the ODP and the PDP).
13. The QLDC owned Recreation Reserve (designation #365) is approximately 8ha in area. As I understand, the designation allows development to occur within this site without any planning approval. Permitted development in this designation area includes a 20% impervious surface coverage (approx. 16,000m²), 5% building coverage (approx. 4,000m²), buildings to 10m in height and a maximum of 100m² in area for any one building.
14. Despite her description of a modified environment, Ms Mellsop continues to consider the escarpment and river flats part of an ONL. I respectfully disagree and address this matter in detail below in my assessment of the landscape category boundary.

Proposed Rezoning

15. Ms Mellsop also provided landscape evidence with regards to the submission to rezone all of the site to MDR. In terms of Ms Mellsop's rezoning evidence, I agree on the following:
- For most of the site, rezoning is unlikely to have any additional adverse effects on landscape or visual amenity;
 - Where existing residential lots and open space adjoins the margins of Hayes Creek, additional development on this land has the potential to significantly detract from the natural character of the creek margins.
16. Where my opinions of the proposed rezoning and those of Ms Mellsop's differ they will be addressed below in my assessment of the proposed rezoning.

LANDSCAPE CATAGORY BOUNDARY

17. I have seen no detailed assessment of the site in the Environment Court Decision C203/2004, which determined the escarpment and river flats to be part of an ONL. The Court provides little discussion of the values of this specific part of the landscape as C203/2004 examined the much larger Remarkables and Ben Cruchan mountains

and the Kawarau River, to determine where the northern edge of this large, vast and complex ONL ended. As part of its decision, the Court references a portion of Landscape Architect Ms EJ Kidson's evidence:

*The Kawarau River similarly (to the legibility of the Remarkables and Ben Cruchan Range as a mountain range) is also highly legible as a river valley that has a confined path with clear banks and floodplains.*³

18. I consider that the Kawarau River would continue to be highly legible as a river valley without the benefit of the escarpment or the river flats. I also find it inconsistent that the 'banks and floodplains' of the site were included in the ONL as determined by the Court, while the 'banks and floodplains' of the Shotover River / Kawarau River confluence near what is now Shotover Country were not included as part of the ONL (**Attachment B**).

19. I note that the C203/2004 decision references a part of the Environment Court Decision C180/99 which states:

*...ascertaining an area of outstanding natural landscape should not (normally) require experts. Usually an outstanding natural landscape should be so obvious (in general terms) that there is no need for expert analysis.*⁴

20. I also note that the word 'outstanding' in section 6(b) of the RMA means "conspicuous, eminent, especially because of excellence" and "remarkable in"⁵ and that if considered by a district council, then *outstanding* should be considered in terms of the district.⁶ I do not consider the Bridesdale escarpment or the river flats are *obviously* outstanding or natural, especially in the context of the wider Remarkables/ Ben Cruchan/ Kawarau River/ Morven Hill ONL. The SH150011 landscape assessment prepared by Baxter Design Group provides a useful commentary on the escarpment. This report states:

By itself, the terrace face and floodplains are not considered to be significant...()In comparison, the ONL's of Peninsula Hill, Slope Hill / Lake Hayes and the Crown Terrace are significant on their own and if removed

³ EnvCrt C203/2004 page 7

⁴ EnvCrt C180/99, Part 99

⁵ Env Crt C23/99, Part 82

⁶ Env Crt C23/99, Part 85

from the wider landscape context would continue to be considered outstanding. The terrace and floodplains of the site however, if removed from the Kawarau River context would not be considered outstanding and would instead perhaps form part of a VAL.⁷

21. As noted above, the escarpment and river flats have been modified with the approval of SH15001. While there has been some discussion about the landscape category of the site in the SH15001 and decisions by the Court, the amended Pigeon Bay criteria has not been applied specifically to the site. The following portion of this report applies the Amended Pigeon Bay criteria to the river flats and southern most escarpment between pt 439, the Kawarau River and Hayes Creek.

Application of the Amended Pigeon Bay Criteria

Natural Science Factors

22. The escarpment and river flats are part of a series of terraces between the Shotover and Kawarau Rivers, Slope Hill and Lake Hayes ONLs and ONFs. They form part of a river terrace landscape which has direct associations to the Frankton Flats and Lake Wakatipu. Their geologic make up is a mix of Alluvium and Loess/Alluvium. Topographically, this land presents a series of flat terraces stepping down escarpments from the upper Ladies Mile and Frankton Flats to meet the flood prone deltas, pasturelands and wetlands adjacent to the river corridors. This river terrace topography is interrupted by a small *rôche moutonnée* (pt 439) west of the site and the much larger *rôche moutonnée* of Morven Hill (pt.750) and its westerly satellite summit (pt 559). Near the western toe of Morven Hill is Hayes Creek which drains Lake Hayes. Hayes Creek has cut a shallow gully between Morven Hill and the terrace landform.

23. North and west of the Kawarau River is a large (approximately 48ha) area of flat pastureland (the river flats). This flat pastureland extends between 300m and 700m north from the edge of the Kawarau River to the base of an escarpment. This escarpment has been modified by residential development, roads and the removal of vegetation.

⁷ Part 69

24. Ecologically, the river flats and escarpment has been heavily influenced by residential and pastoral land uses which have established a pattern of exotic evergreen and deciduous trees in belts across the river flats, while the floor of the flats is covered in exotic pasture grass. On and near the escarpment the vegetation is generally composed of residential amenity trees and shrubs. Self-seeded willow trees line the banks of the Kawarau River and Hayes Creek.
25. It is understood that the river flats are within a flood zone. This adds a dynamic component to the landscape that can demonstrate the river flat's association with the Kawarau River. This dynamic component is temporary, however the effects of this dynamic component (siltation, pooling, erosion) may periodically change the form and appearance of the river flats.

Aesthetic Values

26. The aesthetic values of the site are mostly embodied in views across it toward the mountains which backdrop the basin, towards the willow choked, but no less vegetated Kawarau River corridor and the pastoral river flats. These views include vistas from the escarpment and elevated portions of the Queenstown Trail towards the slopes of the Remarkables (**Image 2**). The river flats act as the foreground to these views and the pattern of exotic trees and pasturelands provides a pastoral context to the foreground of these views.
27. Another viewpoint, which is probably the more frequent viewpoint, is from the public trail along the true left of the Kawarau River bank, looking north across the river flat to the Bridesdale development (**Image 1**). From this viewpoint the river flats are a not particularly memorable immediate foreground and the aesthetic values of the escarpment as an open foreground toward Coronet Peak have been significantly diminished with the level of development which has occurred atop the escarpment.
28. In both the viewpoints described above, the level of development anticipated in the recreation reserves in tandem with that permitted in the Bridesdale allotments will diminish the naturalness and coherence of the river flats.
29. Aside from their function as the foreground to views, the river flats are farmed, and the level of human modification is obvious. They are not particularly natural or pristine and they in many ways contrast with the naturalness of the Kawarau River and the ONL slopes above it.



Expressiveness (Legibility)

30. The formative processes of the landscape are clearly legible in the series of terraces and escapements as well as the *rôche moutonnée* of Morven Hill and pt 439 and the steep and contrasting north facing mountain slopes of the Remarkables. The surface of the Kawarau River and Hayes Creek, and the associated wetland areas are generally cloaked by willow trees and not readily perceivable from the ground plane. The distance between the Bridesdale Escarpment and the surface of the Kawarau River, combined with the low natural character and anticipated development on the river flats does not clearly link the escarpment to the Kawarau River. The escarpment and river terraces are more clearly expressed as a remnant of the historical flows of the Kawarau River and pastoral land use.

Transient Values

31. The change in colour expressed by the deciduous trees in the landscape including willow and poplars give the landscape a transient quality. So too does the occasional presence of snow and frost on the flatlands in the winter months. In much longer time scale of decades, the landscape's susceptibility to flooding is also a transient value. The presence of grazing animals and birds is also a transient value.

Shared and Recognised Values

32. The site is part of a low-lying area which is not highly visible from much of the surrounding areas. The values of the site are associated with the existing pastoral land use which is indicative of the historic associations of land use within the Wakatipu Basin. This more agrarian land use is being, and is anticipated to be, supplanted by more recreation and residential land uses. These uses can be shared and recognised by the residents of the surrounding residential areas who use the roads and trails within the landscape as recreation space.

Values to Tangata Whenua

33. No nohanga sites or known waahi tapu within the vicinity of the site.

Historical Associations

34. The site is part of a historical farm, associated with the Red Cottage on the Bridesdale Land. There are no known archaeological sites on the escarpment or river flats.

Summary of Amended Pigeon Bay Criteria

35. The above application of the *Amended Pigeon Bay Criteria* identifies that the site is part of a wider terrace landform. The natural science factors of the terraces and escarpments and their associations with the Shotover and Kawarau River are legible and expressive. However, the naturalness of the terraces, escarpments and river flats have been degraded by existing and permitted residential and recreational land uses and associated effects. The river flats and escarpments do not display natural vegetation patterns and the more naturalistic patterns of (exotic willow) vegetation occur near the edges of the Kawarau River and Hayes Creek. The values of the site are generally that of a semi-rural, and recreation flatlands which are a foreground in views towards the Remarkables ONL in one direction and the Bridesdale (and other) residential development in the other direction.

Landscape Category

36. The residential developments of Bridesdale (including the garden allotments) and the Judge and Jury portion of Lake Hayes Estate (being the lots south of Judge and Jury Drive) has degraded the integrity of the escarpment and the river flats, loosened their relationship to the Kawarau River and clearly diminished their natural character. The escarpment is between 300m and 700m in distance from the surface of the river and between the escarpment and the river is a rural farming pastureland segmented by exotic shelterbelt trees. Existing residential development is highly visible from the river flats and forms the ridgeline of the escarpment (**Image 1**). This existing development and the potential development which may occur on the designated Recreation Reserve has degraded and will further degrade the relationship of the escarpment and river flats to the natural and outstanding qualities of the Kawarau River and the wider Remarkables/Ben Cruchan ONL.
37. I consider that in 2004 when the Court determined the terrace and floodplain to be part of the ONL, it is likely the river flats and escarpment were more natural in

character and legibly associated with the Kawarau. However, since the developments enabled by SH15001 and what is possible within the designation of the recreation reserve, the escarpment and the river flats between it and the Kawarau River no longer represent values which are indicative of ONLs. I do not consider the escarpment or river flats are outstanding in their own right, nor do I consider they are a legible part of the wider ONL. Instead I consider they are more closely linked to the upper terraces and escarpments which have a residential character.

38. I consider that the vegetated banks of the Kawarau River and its confluence with the more vegetated, cascading portion of Hayes Creek adjacent to the slopes of Morven Hill *do* exhibit outstanding natural qualities and are part of an ONL. I consider the landscape category boundary is more appropriately located:

- On the northern and western edge of the Kawarau River's associated vegetation;
- On the southern edge of the lower portions of Hayes Creek near its confluence with the Kawarau River leading between the western foot of Morven Hill and the escarpment, deviating to the east to meet Morven Hill near the line of pylons.

39. I include a plan of where I consider the landscape category boundary should be amended and included in the PDP as **Attachment C**.

PROPOSED REZONING

40. I understand the submitter seeks to rezone all of the site MDR. The Section 42A report prepared by Anita Vanstone provides a detailed description of how this rezoning may occur. Ms Vanstone accepts the evidence of Ms Mellsop and does not support the realignment of the landscape category boundary such that it follows the true left of the Kawarau River. Her recommendations are based on the assumption that the escarpment and river flats are part of an ONL. Ms Vanstone recommends that the submission be accepted in part.

41. For reasons set out above, I do not consider the escarpment or the river flats to be part of an ONL. Ms Mellsop and Ms Vanstone use the landscape category boundary as a central justification for recommending refusal of the rezoning relief sought under

submission 655. Therefore, in the following assessment I will address the effects of the proposed rezoning on the escarpment and river flats as if they were part of an ONL. This assessment focuses on the effects of a potential 9 – 10 houses which could be located below the road, on the base of the escarpment, if the MDR zoning is extended to include that land.

42. While the series of terraces between the Shotover River, Shotover River Delta, Kawarau River, Morven Hill and Ladies Mile are expressive and retain a level of natural character, the immediate landscape is dominated by the urban character of Lake Hayes Estate, Shotover Country and Bridesdale. The outstanding and natural qualities of the surrounding ONL mountains including Slope Hill, Ferry Hill, Morven Hill, Cecil Peak and the Remarkables provides a sense of open relief and a high degree of visual amenity to these otherwise urban areas. The river flats between the Kawarau River and existing urban development act as an open buffer between the urban and outstanding landscapes.
43. I consider that the existing roads, Bridesdale garden allotments and their sheds, the trail parking area, network of walking and cycling trails and the potential effects associated with the QLDC owned recreation reserves, make the river flats in a period of transition from a pastoral character to an urban parkland character. The existing visual amenity values of the river flats is central to its function as the frontispiece to the more outstanding areas of the Remarkables/Kawarau River/Ben Cruchan/Morven Hill ONL from some viewpoints. This visual amenity is publicly experienced from elevated parts of the Queenstown Trail and from the tracks associated with the Bridesdale land. Views across the river flats from the public riverside trail are strongly affected by the level of development which has occurred in Lake Hayes Estate and Bridesdale (including the allotments and future sheds).
44. The river flats between the Bridesdale garden allotments and the Queenstown Trail compose an area of approximately 17ha. While I consider this open area has very little outstanding natural qualities, the more southern parts do have value in its open character and contribution to the overall visual amenity of the landscape. I consider the land between the garden allotments and the existing development on the crest of the escarpment offers little in terms of its contribution to this open character and visual amenity. I walked this land on several occasions and the natural character of the lands east of the site associated with Morven Hill and Hayes Creek are significantly more appreciable in their natural in character. I acknowledge that the natural character of the escarpment will be enhanced as native planting matures,

however it will continue to be wedged between an urban and urban park like landscape character.

45. If the MDR zoning were approved and 9 -10 houses were to be built below the existing road near the base of the escarpment, the main effect would be on views from the road and footpath towards the Remarkables ONL (**Image 3**) as the houses would likely screen some of the lower portions of this view. This view would be held from within an already urbanised environment which at present will be affected by the garden allotments and associated sheds and I do not consider the overall visual amenity of the landscape would be adversely affected. This view to the south would continue to be available and unaffected from the trails to the east of the road. Houses below the road as viewed from the riverside trail will be visually absorbed against the escarpment and will not adversely affect any views from the trail and these 9 – 10 houses would be seen behind the garden allotment sheds.
46. Overall, I consider development of the density allowed under the propose MDR zoning could occur on this land without adversely affecting the landscape and visual amenity values of the wider ONL.

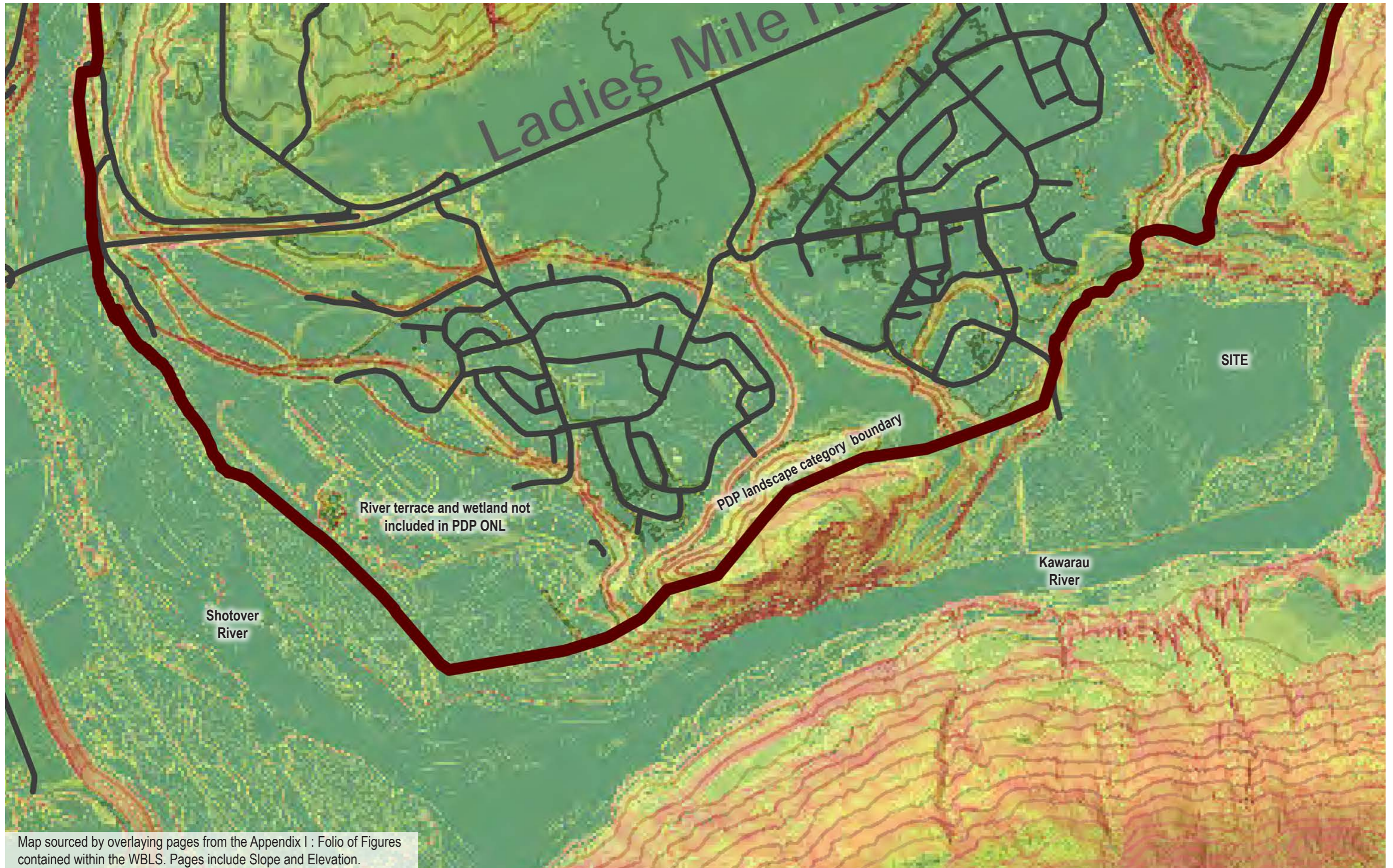
RECOMMENDATIONS

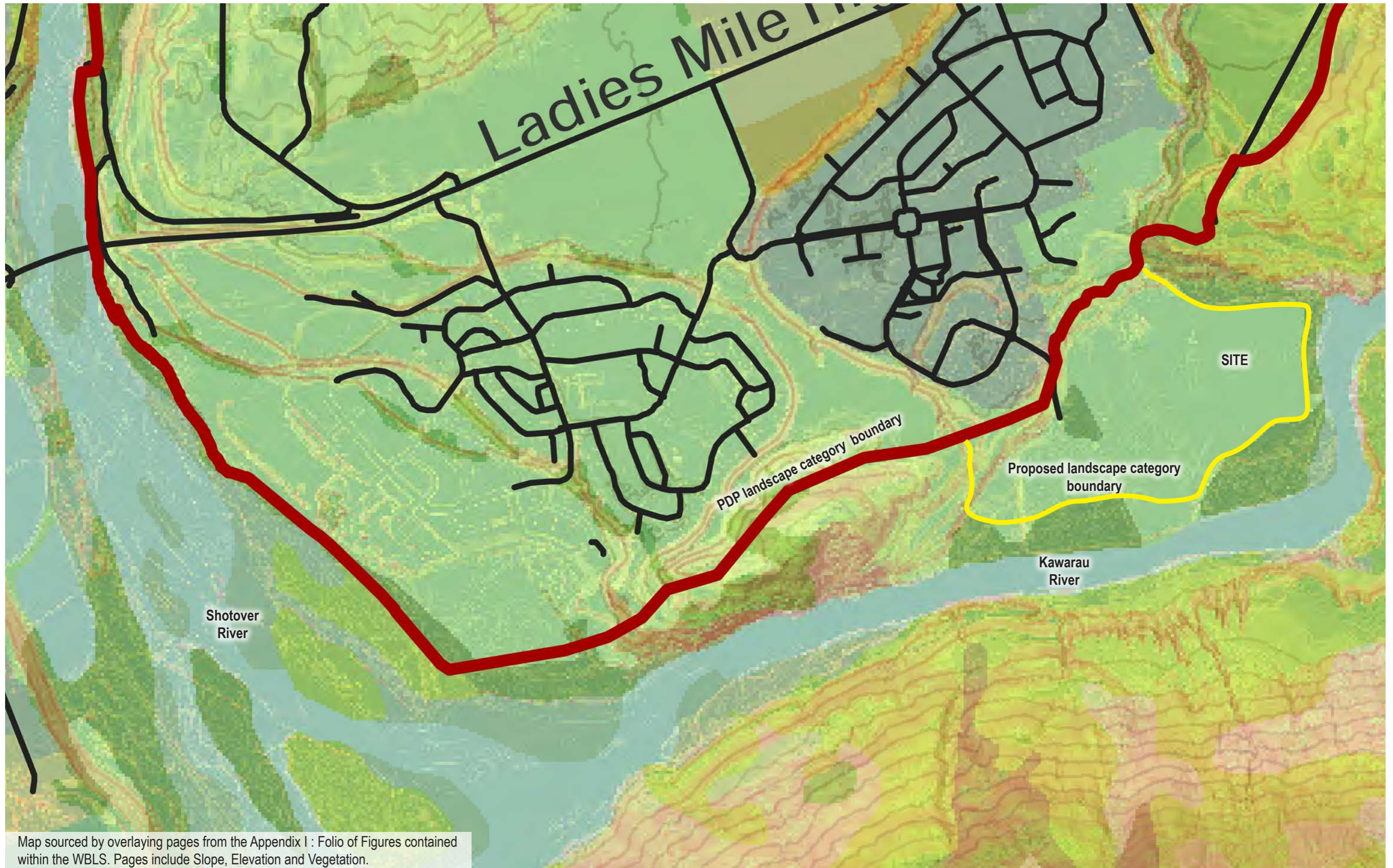
47. I recommend the landscape category boundary be amended to omit the escarpment and river flats. This category boundary should include PT439 and near its base closely follow the vegetated margins on the true left of the Kawarau River, meeting the confluence of Hayes Creek to follow the vegetated margins on the true right of Hayes Creek to meet the western toe of Morven Hill.
48. The Bridesdale Land north of the garden allotments show in in **Attachment D** should be rezoned MDR.

Stephen Skelton

Landscape Architect
13 June 2018







Map sourced by overlaying pages from the Appendix I : Folio of Figures contained within the WBS. Pages include Slope, Elevation and Vegetation.







IMAGE 1: Taken on 13 May 2018.



IMAGE 2: Taken on 13 May 2018.

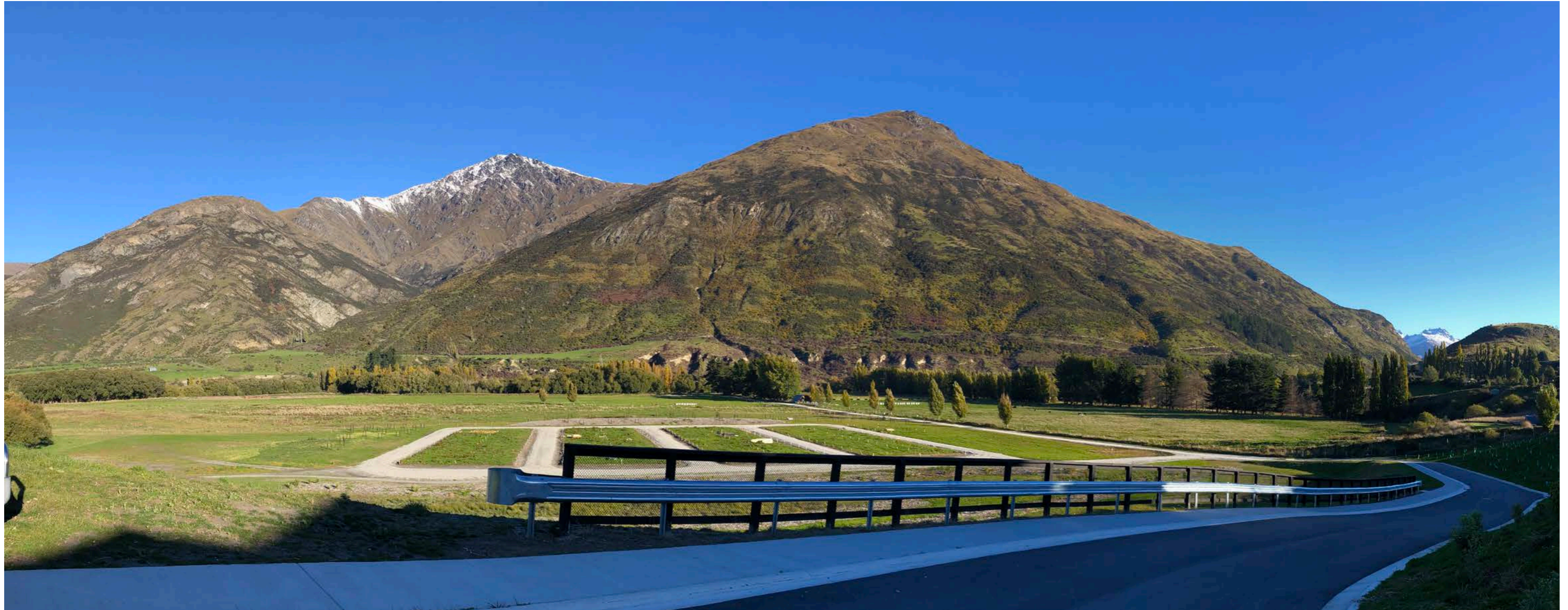


IMAGE 3: Taken on 13 May 2018.