

Before the Hearings Panel
For the Proposed Queenstown Lakes District Plan

Under the Resource Management Act 1991 (**RMA**)

In the matter of of a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23

Summary of Evidence of Stephen Russell Skelton

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1. INTRODUCTION

- 1.1 My name is Steve Skelton. My qualifications, experience, and background to the matter and are outlined in my Evidence in Chief (EIC).
- 1.2 I defer to legal counsel for questions of scope in terms of whether this process provides scope for submitters to contest boundary lines of the PA overlay areas and/or ONL classifications, and/or any consequent urban growth and rezoning outcomes.

2. SUMMARY OF LANDSCAPE EVIDENCE

2.1 Prior to preparing my evidence for this process, I evaluated the site as part of the QLDC Spatial Plan 2023 Gen 2.0 – Call for Urban Growth Sites. During that evaluation I prepared a series of layers setting out the physical attributes of the site. At a high level I undertook an assessment of the landscape’s physical, associative and perceptual attributes and values and determined that there was likely scope for urban development on the lower part of the submitter’s site where that development would:

- a) read as infill to existing development patterns,
- b) not extend beyond the upper elevation of existing development, thus enforcing a robust urban / natural edge,
- c) result in positive ecological and natural character outcomes with regard to removal of wilding conifers and other weed species and the undertaking of restoration planting and landscape management strategies to support indigenous ecosystem regeneration, and
- d) enhance the landscape’s recreational attributes and values.

2.2 Following that body of work I was asked to review the landscape schedule and assess the site’s values and capacity against the attributes and values set out in the schedule. In undertaking that review I consider that the lower part of the site which I had identified as suitable for future urban development during the Spatial Plan submission, reflected very little of the attributes and values associated with section 6b landscapes, especially those set out in schedule. I consider the only parts of the schedule which are associated with the lower part of the submitter’s site include:

- a) the unnamed streams which pass through to site towards Fernhill,
- b) the proliferation of wilding conifers,

- c) the juxtaposition of urban areas (and UGB) against the PA, and
- d) recreational attributes and values.

2.3 I consider that the attributes and values associated with the lower part of the site have the capacity to be enhanced through future urban development of this part of the site. I attached a series of supporting graphics to my EIC. Below I reproduce a 'mock up' image (my EIC Attachment L) which demonstrates how potential urban development of approximately 600m² lots on the lower part of the site may affect perceptual values. I consider this 'mock up' image illustrates that there would be little to no adverse effect on the landscape's perceptual attributes and values associated with urban infill type development on the lower parts of the site, below the 560masl contour line.



2.4 Also, I consider the use of a cadastral boundary as an ONL or ONF boundary, in this instance (and I'm sure in other parts of the PA's where they adjoin urban areas or exemption zones) is not a defensible edge for the ONL because cadastral boundaries:

- a) often do not follow existing patterns and processes in the landscape,
- b) often do not reference geomorphology or other physical features in the landscape;

- c) are not placed according to an assessment of values and attributes of a landscape

2.5 I also note that it is usually best practice to identify landscape values and attributes before, or at the same time as identification of landscape boundaries. I consider the approach of this process, where landscape boundaries are predetermined and the attributes and values within the PA's are to be defined, 'puts the cart before the horse' and does not allow for flexibility when, for example, it may be that parts of a PA do not hold the attributes and values of the balance landscape. I also note that values of landscape change over time.

2.6 I consider that the PA landscape boundary in this instance would be more appropriately located if it adhered to and connected the landscape's existing (and anticipated) development patterning, and used the high point of existing and anticipated development (at approximately 560masl) as a physical feature to locate a defensible edge. I consider this would result in a true reflection of the ONL boundary in this location and would better protect the landscapes attributes and values.

2.7 I agree with the schedules' general assessment that urban context juxtaposed against an ONF/L adds to memorability, appeal and is of importance to the identity of Queenstown. I consider the existing PA boundary does not follow any legible pattern or feature - and that undermines the importance and legibility of the urban / natural interface. I consider that appropriately controlled urban expansion in the area I have identified above (coupled with enhancement of the wider site's attributes and values) would better define a more coherent urban / natural interface, thus enhancing the landscape's memorability and appeal.

3. OUTCOMES FROM JOINT WITNESS STATEMENT

3.1 I participated in the expert conferencing from 2nd to 4th October 2023. I agree with the revised landscape capacity rating scheme, in particular the removal of the 'no capacity' rating across all landscape schedules. I have since learned that Council seeks to amend the agreed JWS wording of the capacity rating Extremely Limited to No Capacity. I support the text in the JWS version which was agreed by experts. I consider the use of the qualifiers 'occasional', 'unique' and 'discrete' to be significant and directive. The wording of the capacity rating was the subject of significant debate during conferencing and the JWS wording was widely adopted by experts.

3.2 My EIC made several recommended changes to the Schedule, some of which have been adopted. However, while I suggest a qualitative capacity rating for infill urban expansion to the lower part of the submitter's site, that qualification has not been agreed by Council.