

PROPOSED TE PUTAHI LADIES MILE PLAN VARIATION

SUMMARY OF EVIDENCE OF TONY DOUGLAS MILNE ON BEHALF OF THE

ANNA HUTCHINSON FAMILY TRUST

1. 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 20 October 2023, and I did not receive any questions from the Queenstown Lakes District Council or any submitters.
2. I attended the Expert Conferencing on Monday 30th October 2023, and signed the Landscape Architects Joint Witness Statement, dated 2nd November 2023. This process was generally beneficial, although there has been limited engagement with Council consultants following.

Succinct summary of key points of my evidence

3. Regarding the capability of the Extension Area to absorb development, I consider that there exists an opportunity, beyond that anticipated by the WBLP zoning but consistent with the general intention of the TPLM Variation, for future development within the Extension Area. This would reinforce and complement the landscape setting without resulting in adverse effects of concern on the key landscape values. Further, there are many positive effects on landscape and amenity resulting from the proposed extension including opportunities for greater biodiversity within the Extension Area through native planting on the escarpments that would enhance the natural character of the Extension Area and Shotover River corridor.
4. Visibility of future development enabled by the proposed extension from SH6 will be limited to eastbound traffic and for a relatively short (in distance) duration. Parts of the Extension Area are visible in the mid-ground and while future development will be visible, in my opinion it will not detract from the shared and recognised visual amenity values associated with the wider landscape and experienced by the public on SH6. Further to this the development enabled by the TPLM Variation will result in SH6 essentially becoming an urban environment and therefore development within the Extension Area will also be viewed in this context.
5. The Trust's proposed extension¹, structure plan and provisions consider the Extension Area's landscape sensitivity and visual influence. While the Extension Area has a strong connection to the TPLM Variation zone as notified, what is proposed is not simply a roll out of an extension without thought, rather it is a carefully considered extension that responds to the potential opportunities and

¹ Updated Zoning Plan as appended to Supplementary Joint Witness Planning Statement – 10 November 2023

constraints, based on the landscape values and an understanding of the key differences between the TPLM Variation zone and the Extension Area. From a landscape perspective, I consider that the Extension Area is well-integrated with the notified Variation Area.

Latest position on the matters remaining in dispute

6. I have read the rebuttal evidence and responses to questions asked of Mr Stephen Skelton², Mr Jeffery Brown³ and Mr Stuart Dun⁴ on behalf of Queenstown Lakes District Council, relevant to the Trust's submission. I have also read the urban design and transport experts Joint Witness Statement.⁵ I note that Mr Brown and Mr Dun (in response to Panel questions), from a planning and urban design perspective respectively, consider the extension of the TPLM on to the Extension Area as feasible, albeit not as part of this current process nor exactly as per the Saddleback Structure Plan. I leave it to others to talk in detail about timing and process, although I think if the Extension Area is to be included then doing so now will allow better integration than what might be achieved later.
7. From a landscape and visual amenity perspective, there remain two main areas of dispute (between Mr Skelton and me). First is the extent of landscape effects resulting from the intensification of urban development on the Extension Area. And second is the effectiveness of the proposed TPLM Variation defensible edge to urban development.
8. In terms of landscape and visual effects, the issue is the potential effects of the Extension Area on landscape values as experienced in views from both public places and private residences. Essentially, will the visual amenity of the landscape as experienced in these views be adversely affected? Bearing in mind, change in a view does not necessarily result in an adverse effect. In my opinion, the legibility and expressiveness of the Shotover River, Slope Hill and the wider mountains, i.e. the key values of the ONF's/ONL's associated with the broader landscape would remain intact. In reference to Mr Skelton's wireframe imagery attached to his summary of evidence, while I do find these somewhat crude, the imagery on Pages 23 and 24 does demonstrate that Mr Skelton's previous position of not being able to see any of the TPLM Variation from this view is incorrect⁶.
9. Regarding a defensible edge and containment, from a landscape and visual perspective, in my opinion the Extension Area presents a logical and rational extension to the TPLM Variation zone. The Variation

² Rebuttal Evidence of Stephen Skelton. Landscape Architecture – Te Pūtahi Ladies Mile Plan Variation. 10 November 2023.

³ Rebuttal Evidence of Jeffrey Brown. Planner – Te Pūtahi Ladies Mile Plan Variation. 10 November 2023.

⁴ Rebuttal Evidence of Stuart Dun. Landscape Architecture – Te Pūtahi Ladies Mile Plan Variation. 10 November 2023.

⁵ Joint Statement of Urban Design & Transport Experts in Relation to Te Pūtahi Ladies Mile Plan Variation, 24 November 2023.

⁶ Rebuttal Evidence of Stephen Skelton. Landscape Architecture, para 11 – Te Pūtahi Ladies Mile Plan Variation. 10 November 2023.

currently terminates at Lower Shotover Road, a convenient but not physically defensible edge. The Extension Area presents an opportunity for the Variation to extend to the Shotover River (ONF) to the west which is plainly defensible, to the south contained by the SH6 cutting (again no issue with defensibility), and to the north by a gully that bisects the Shotover River Terraces. I acknowledge there are further gullies and terraces to the north, that is the landscape, and just like there are additional spurs on this western end of Slope Hill. These features would however provide a more legible, better defined and logical set of constraints to the edge of the zone.

Dated: 11 December 2023