

## PROPOSED TE PŪTAHI LADIES MILE PLAN VARIATION

### RESPONSE OF STEPHEN RUSSEL SKELTON ON BEHALF OF THE QUEENSTOWN LAKES DISTRICT COUNCIL

- 1 My full name is Stephen Russel Skelton. I am a Director of Patch Limited (**Patch**).
- 2 I have prepared the following documents with regards to Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**):
  - (a) Statement of evidence on behalf of Queenstown Lakes District Council (**QLDC** or **Council**) dated 29 September 2023;
  - (b) Rebuttal evidence on behalf of QLDC dated 10 November 2023;
  - (c) Written answers to questions from submitters dated 24 November 2023;
  - (d) Summary of evidence dated 4 December 2023 including Appendix A response to the Hearing Panel Minute: Pre-Hearing Questions.

#### Response to matters raised at the Hearing

##### *Questions from Mr Munro to Mr Milne for Glenpanel Developments Limited*

- 3 During the hearing Mr Munro asked a question of Mr Milne and referred to the graphic evidence of Mr Compton-Moen presented in his summary. Mr Munro referred to Drawing Number 2023\_185/004 revision F (attached to this reply as **Appendix A** for convenience), which depicts an urban environment as viewed from SH6 near the Shotover Bridge. Mr Munro's question of Mr Milne was with regard to the potential future of the existing trees which are shown in Mr Compton-Moen's graphic.
- 4 I note Mr Compton-Moen's graphic uses an image I took and was included in my Evidence in Chief as image 4 (attached as **Appendix B**). When preparing visual simulations, it is very difficult to be accurate in your depiction without having a GPS location which clearly identifies the viewpoint. It is also not best practice to use images taken by others.
- 5 With respect to existing trees and the question asked by Mr Munro of Mr Milne I consider it is important that the panel is aware of the following points:
  - (a) The mature, high stature evergreen trees which exist on the terrace to the west of the Anna Hutchinson Family Trust (**AHFT**) site are a mix of wilding conifer species, mostly Douglas fir and Ponderosa pine trees which are a pest species and sought to be eradicated from the district by both the Otago Regional Council and the Queenstown Lakes District Council. These trees are listed in Chapter 34 of the Proposed District Plan (**PDP**) as prohibited from being planted. In my experience, I understand that in resource consent applications the Council does not allow applicants to rely on vegetation as screening mitigation, when that vegetation is made up of prohibited species listed in Chapter 34. It is highly likely that as part of any application on the AHFT site that these trees will be removed.
  - (b) While Mr Compton-Moen's graphics have retained the wilding conifers in his image, he has removed many of the mature, high stature exotic trees which exist in the Lower Shotover Cemetery, as well as existing, mature high stature trees which exist on the terraces near Old School Road. These existing trees are highly likely to be retained in perpetuity as they provide a high degree of amenity, are non-wilding, and with regard to the trees in the Lower Shotover Cemetery, exist in a public space. These existing, non-wilding trees provide

for a high degree of screening of the TPLM Variation Area as viewed from the east, particularly from this view near the Shotover Bridge on SH6.

*Amenity access area and views to Slope Hill from SH6*

- 6 During the hearing I was queried by Mr Munro as to how I considered high stature trees to the south of SH6 may reduce the amenity values of the Slope Hill ONL. Of relevance to this, since the hearing, some changes have been made to the amenity access area design, including a reduction of trees.
- 7 I consider that the main amenity of Slope Hill is experienced from other parts of the surrounding landscape where the whole of the roche moutonnee feature can be experienced and held in one view. From SH6 the south facing slopes of Slope Hill are a dominant mass, but it is not until the user is farther afield in places like Lake Hayes Estate where the whole of the massif and its dominant ridgeline is highly appreciable.
- 8 Slope Hill does provide a high amenity to users in SH6 and that amenity will largely be retained by the TPLM Variation as users approach Queenstown from the east where views will continue to be available across the Threeepwood site to the south facing slopes of Slope Hill. At present, much of Slope Hill is not visible from other, more western parts of SH6 as the highway is lined with dense vegetation which restricts views from the highway to the ONL.
- 9 I have reviewed the latest Amenity Access Area plans prepared by Studio Pacific Architecture. While I consider trees provide amenity, the latest set of plans have reduced the scale of trees which will result in some positive effects in terms of reducing the screening effect of trees towards Slope Hill. There will be gaps in vegetation where the visual presence of Slope Hill will still be appreciable. It is my opinion that trees hold an amenity in their own right and currently the views across the TPLM Variation Area to Slope Hill from SH6 are largely not available as the northern edge of SH6 is predominantly lined in a dense hedge. The approval of the TPLM Variation will remove this hedge in favor of spaced trees and will make views from SH6 to Slope Hill more available, regardless of the proposed high stature vegetation.

**Stephen Russel Skelton**

**26 January 2024**

**Appendix A - Drawing Number 2023\_185/004 revision F**



**A. VP1 - ARTIST'S IMPRESSION - VIEW EAST FROM SH6, 200m WEST OF SHOTOVER RIVER (INDICATIVE ONLY)**

Base photo sourced from the evidence of Mr Skelton and modified using Sketchup and Photoshop CS. The Anna Hutchinson Site has been modelled in Sketchup with indicative house typologies inserted to provide a indicative built form and visual appearance

**B. LOCATION PLAN**

client / project name: GLENPANEL / INDICATIVE DEVELOPMENT ILLUSTRATIONS  
 drawing name: **VP1 - EAST FROM SH6**  
 designed by: DAVID COMPTON-MOEN | ANCA BELU  
 drawn by: ANCA BELU / ZOE HUGHES / JEREMY ROSS  
 original issue date: 7 DECEMBER 2023  
 scale: NTS

| revision no: | amendment:              | approved | date       |
|--------------|-------------------------|----------|------------|
| A            | Issue for Comment       | DCM      | 07/12/2023 |
| B            | Additional View         | DCM      | 07/12/2023 |
| C            | Minor Changes           | DCM      | 07/12/2023 |
| D            | Design Changes          | DCM      | 08/12/2023 |
| E            | Update to VP3           | DCM      | 11/12/2023 |
| F            | Additional Images added | DCM      | 11/12/2023 |



**DCM URBAN DESIGN LIMITED**  
 10/245 ST ASAPH STREET  
 CHRISTCHURCH 8011  
 WWW.DCMURBAN.COM

project no / drawing no: **2023\_185/004**

revision: **F**

**Appendix B – Image 4, Statement of Evidence of Steven Russel Skelton**



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