

BEFORE THE CENTRAL OTAGO DISTRICT COUNCIL

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

AND

IN THE MATTER a request for a Plan Change (PC13) to the Central Otago District Plan (**CODP**) to introduce a new zoning, the "River Terrace Resource Area" with its own provisions, as a new chapter (Chapter 20) in the CODP.

STATEMENT OF EVIDENCE OF STEPHEN SKELTON FOR

River Terrace Developments Ltd

(PC13)

23rd April 2019



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.
2. I have been involved in landscape consultancy work for six 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 another landscape architecture practice in Queenstown. I founded Patch in June 2016 and our work includes all facets of landscape architecture and landscape planning through the range of small and large-scale projects. My work involves 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 and plan changes.
3. 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

4. My evidence will provide a description of the landscape and an assessment of the proposal's actual and potential effects on landscape character and visual amenity. I will respond to the S42A report and to submissions lodged to the Request. A series of attachments and images are included.



DESCRIPTION OF THE LANDSCAPE

5. Cromwell occupies an area of flat land east of the Pisa ranges, north of the Kawarau River, west of the Dunstan Mountains and south of the wider parts of Lake Dunstan. The wider landform is composed of a mix of steep hilly and rolling land with fans and terraces formed by the dynamic processes of parallel fault-block mountains and their interplay of ice and valley erosion. The flooded Clutha River (Lake Dunstan) and its confluence with the Kawarau River is a defining feature of the Cromwell area.
6. Cromwell's surrounding mountains vary mildly in character with rocky tors defining the slopes and peaks of the Pisa and Dunstan mountains while the slopes south of Bannockburn are slightly less dramatic. Other defining landform features include outwash and river terraces with the Lowburn terrace to the north being the most significant and legible. The Cromwell Flats are an area of relatively flat land composed mainly of outwash alluvium formed by lake sediments and former courses of the Kawarau River.
7. The vegetation of the Cromwell Flats is a mix of agricultural plantings including crops, orchards, vineyards, woodlots and pasture grass. Shelterbelts and orchards provide the main vegetated structure of the Cromwell flats with most parcels of land bounded by mature plantings of conifers and poplars.
8. Cromwell has a rich cultural history which has shaped the landscape. The flooding of the Clutha River, mining and agriculture activities have resulted in significant changes in the landscape's natural values. The flats are now composed of patches of urban, peri-urban, rural living, industrial and agricultural activities and visitor attractions. These patches of mixed character areas are traversed by two major road corridors; SH6 and SH8b which link the surrounding communities via the Kawarau Gorge, the Upper Clutha Basin and the Cromwell Gorge.
9. Overall the Cromwell Flats Landscape (**Attachment A**) displays a mix of modified character areas bounded by the natural frame of the surrounding mountains and waterways.
10. The Cromwell Flats are not part of an Outstanding Natural Landscape as identified in the CODP Map 44. I agree that the site is not part of an ONL.



11. The site is located in the southern portion of the Cromwell Flats. It is part of a mixed character area dominated by its neighbours to the east: the Highland Motorsport Park, the Speedway and a large Council woodlot. Other activities, including rural living, orchards, vineyards and open grassland form part of this mixed character area. The site is within the Rural Resource Area and Rural Residential Resource Area as shown in Map 44 of the CODP. A river terrace escarpment crosses the site in an east-west direction.
12. Schedule 3 of the Regional Policy Statement (Decisions Version) requires the identification of 'highly valued natural features and landscapes'. I have reviewed the biophysical, sensory and associative attributes of the site and consider the flat river terraces, the terrace escarpment which crosses the site and the site's limited vegetation which is typical and insignificant in the Cromwell Flats landscape and surrounding area. While the terrace escarpment is a feature which legibly expresses the landscape's formative processes, it is not memorable, wild or scenic and the balance of the site does not possess any other attributes which would render it highly valued. I do not consider the site contains, or is part of, a highly valued natural landscape or feature.
13. The site's northern boundary is adjacent to SH6 and much of its eastern boundary is adjacent to Sandflat Road. There are rural living neighbours to the north and west. Some native scrub exists on the terrace escarpment. A manmade water race crosses the site near the foot of the terrace escarpment and another water race crosses the site near its southern boundary. Shelterbelts of conifers exist across parts of the site's western boundaries and on its periphery, but are largely not within the site.

Landscape Experience

14. The relatively flat topography of the Cromwell Flats and its blend of open and vegetated areas creates a mixed and varied experiential quality where views are obscured or partially obscured by vegetation, then giving relief to more open views across grasslands and vineyards to other land uses farther afield. Built form is ubiquitous in the Cromwell Flats with dwellings, farm sheds, fruit stalls and other structures visible throughout the landscape. Views of the summits of the Dunstan and Pisa range contribute to the amenity as experienced though the Cromwell Flats.

SH6

15. The public most frequently experiences Cromwell via the main highways. SH6 adjoins the site, and the experience of using this highway varies if the receptor is traveling north or south.
16. Northbound travellers will have recently left the highly natural character of the Kawarau Gorge and the gateway experience of entering the Cromwell Flats occurs near a bend in SH6 by Pearson Rd. Here the landscape character changes significantly from natural to modified as the receptor leaves the highly natural Kawarau Gorge and enters the more modified Cromwell Flats. Almost immediately the landscape character changes as rural living, visitor attraction, intensive agricultural and associated buildings, netting, machinery, etc become highly visible. The landscape's small character areas are separated by mature shelterbelt plantings and are mostly rural in character until receptors reach the Highlands Motorsport Park where the visitor attraction and urban activities of the Cromwell industrial Resource Area become visible (**Image 1 and 1b**). Near a bend in SH6 near Ripponvale Rd the urban and industrial areas of Cromwell become dominant.
17. Southbound travellers will be arriving from the Luggate area where they pass the rural living areas of Pisa Moorings and Lowburn Terrace. The urban areas of Cromwell are highly visible and dominant as the receptor rounds a bend near Ripponvale Road. The visual presence of Cromwell's residential and industrial areas are visible until one nears the site and the visitor attractions of the Highlands Motorsports Park and other visitor attractions and rural character activities become more dominant. The activities of Bannockburn are visible to the south. As the traveller rounds the bend near Pearson Road they leave the Cromwell Flats and enter the more natural Kawarau Gorge corridor.

SH8b

18. Travellers arriving into Cromwell from the Clyde area also experience a dramatic change in character as they leave the natural Cromwell Gorge area and get their first views of Cromwell town near the Cromwell lookout. This transition from natural to urban is stark. Although separated by the waters of Lake Dunstan the urban areas of Cromwell dominate this part of SH8b.
19. Travellers arriving into Cromwell from the Tarras area experience a more gradual change in character. The northern parts of SH8b are characterised by an interplay of



natural and modified elements including pasture, cropping and vineyards. Also the rural living areas across Lake Dunstan and the Northburn areas are visible. This provides a soft transition between the natural character of the Upper Clutha Basin and the urban areas of the Cromwell Flats. Cromwell Town is visible across the lake from the highway for much of the highway's stretch which runs parallel to and east of Lake Dunstan.

20. The site is not visible from SH8b due to the screening effect of the Council owned woodlot.

Pearson Road

21. Pearson Road runs parallel to the Kawarau River and provides a direct access between the Kawarau Gorge area and lands farther east and south including Bannockburn. The road is separated from the site by a large area of grassland. The southern and western end of Pearson Road is predominantly rural in character although existing zoning suggests it will become more rural living in character. This corridor displays a mix of closed and open characters with dominant views of the Bannockburn Hills to the south.

Sandflat Road

22. Sandflat Road is a mostly unsealed road between SH6 and Pearson Road. It is dominated by the forestry block and the Highlands Motorsport Park to the east. To the west is the subject site and two rural living properties. The site offers views across an open grassland to other rural living development and large conifer shelterbelts near the site's western boundary. The terrace escarpment which crosses the site is a distinct landscape feature experienced from Sandflat Road. This road corridor is in a state of change with the impermanent character of the woodlot, visitor attraction of the Highlands Motorsports Park and the underlying rural residential zoning which has not yet been given effect.

DESCRIPTION OF THE PROPOSAL

23. The proposal is described in the Section 32 document and in the Design Report which forms part of this Request and I adopt those descriptions.

LANDSCAPE ASSESSMENT

24. I have read the S42A report prepared by Johnston Whitney and the Submissions to the notified proposal. The following assessment assesses the proposal's effects on visual amenity and landscape character, responds to Part 7.9 in the S42A report and submissions which raise landscape character and visual amenity issues.

25. My evidence uses the following definitions¹:

- **Visual effects** – Visual effects relate to the changes that arise in the composition of available views as a result of changes to the landscape, to people's responses to the changes, and to the overall effects with respect to visual amenity.
- **Landscape character and amenity effects** – These effects derive from changes in the physical landscape, which may give rise to changes in its character and how this is experienced. This may in turn affect the perceived value ascribed to the landscape.

Extent of Effect

26. In assessing the extent of effects, this report uses the seven-point scale recommended by 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.

Visual Effects

27. As discussed above in parts 14 – 22 of my evidence, the site is visible from only a few places, being approximately 300m of SH6 (**Images 1, 3 and 4**), most of Sandflat Road (**Images 5 – 7**) and approximately 1km of Pearson Road (**Image 8**). It is also visible from the private places which adjoin the site and the more elevated lands looking down and across the landscape such as the Nevis Road (**Image 9**) and some elevated views from the Bannockburn area (**Image 2**).

28. The site is not adjacent to any ONL's or ONF's. While it does display an open character, views across the site to the surrounding or more distant landscape do not hold a high degree of visual amenity. The site is not memorable. I consider the site

¹ As defined in the Quality Planning Resource - <http://www.qualityplanning.org.nz/node/805>

itself has a low level of visual amenity embodied in open views across it to more vegetated areas such as shelterbelts and woodlots or the distant mountains. The visual amenity of the roads and private places near the site is embodied in the broken pattern of rural living, urban, agriculture and visitor attractions which exist within a frame of mountains. The openness of the site forms a small part of the visual amenity as experienced from the elevated areas around Bannockburn. The proposed PC13 urban areas will change the views of and across the site, but not so much that the visual amenity of the Cromwell Flats will be degraded. Overall I consider the proposal will result in no more than **low** adverse effects on visual amenity, and these adverse effects will be diminished as internal and boundary vegetation matures.

Landscape Character and Amenity Effects

29. The Cromwell Flats landscape is composed of rural living, urban, industrial, agricultural and visitor attractions set in a frame of mountains. It is a modified landscape with rural and urban character elements. The site is at the southern end of this landscape where the urban and industrial uses of Cromwell are less apparent, although not distinctly removed from Cromwell's urban areas by any legible landscape transition. The urban areas of Cromwell as well as the modified character of the Highlands Motorsports Park form part of the wider landscape's character.
30. The proposal will see an open grassland site developed for urban activities. This will change the character of the site and surrounds. A proposed 30m setback between buildings and SH6 and tree planting within this setback will assist in maintaining a level of natural character and visual screening of the urban development as viewed along the SH6 corridor. The proposal will see a new patch of urban activity set within a matrix of diverse land uses and corridor experiences. I consider the proposal will increase the urban character elements of the Cromwell Flats but that the wider landscape values which give the landscape its distinct sense of place will be retained.
31. I do not consider the proposal will result in any adverse effects on the gateway experience of Cromwell. The overall character of the Cromwell Flats landscape will be retained. I consider the proposal will result in no more than **low** adverse effects on landscape character.

S42A Report

32. In Part 7.91 of the S42A report, the author David Whitney provides his own description of the landscape. He questions whether the landscape is modified in character and it

is my reading that he considers it is predominantly rural. It is also my reading that he considers the Highlands Motorsports Park rural in character and that the effects of this development, with its associated buildings and icons adjacent to the highway, does not portray a modified character.

33. I disagree with his assessment that the Highlands Motorsports Park does not portray a modified character. I consider the scale of the buildings, sheds, car parks, statues and other facilities and structures represents a high degree of modification. It is difficult to attach urban or rural values to this type of attraction, as motorsports parks throughout the world can be located within urban or rural areas. By their nature, motorsports parks are open. However, the level of built development and impervious surfaces within the Motorsports Park certainly represents modification.
34. Mr Whitney describes the naturalness of the landscape as derived from the presence of shelterbelts, orchards and plantations. I disagree and consider the lineal forms and patterns these land uses create are not natural and display clear signs of human modification and intent. When compared to the natural character of the Kawarau Gorge, Kawaru River, Dunstan and Pisa mountains, I consider the subject landscape would rest somewhere in the middle of the spectrum of naturalness², where it is not predominantly natural or urban, but is clearly modified.
35. Mr Whitney does not recognise any effects of the Highlands Motorsports Park on the visual amenity or landscape character of the receiving landscape. I consider this facility introduces a higher level of modification to an already modified, albeit mostly open landscape.
36. Mr Whitney also asserts that the subject site is not viewed as part of the same landscape as the Industrial Resource Area of Cemetery Road. I have not undertaken the detailed exercise of breaking the Cromwell Flats landscape into separate landscape character units. However, it is clear the Industrial Resource Area with its associated large scale buildings and industrial activities is visible, albeit to a low degree through the SH6 corridor to the north (**Image 1 and 1b**). Also, when the woodlot to the east is felled the urban areas of Cromwell town will be significantly more visible from the site and surrounding landscape.

² C180 / 99, Wakatipu Environmental Society Inc v Queenstown Lakes District Council para 99

37. I consider Mr Whitney assess the receiving environment as it is now without giving full consideration to the Rural Residential activities which may occur on the southern parts of the site and adjoining land to the south and the change those activities may have on the landscape.
38. I disagree with Mr Whitney's assessment that the type of development proposed would be an unexpected element in the landscape. While I agree the proposed development will be somewhat disconnected from the existing urban areas of Cromwell, residential development does form part of the receiving landscape. It is clear Cromwell town is growing and it has largely expanded to the south to meet the Chafer Beetle Nature Reserve. The effects of Cromwell's growth on landscape character and visual amenity is apparent throughout the Cromwell Flats. I consider the proposal will result in some change in the character of the landscape but will not be unexpected. The proposed development will result in a new part of Cromwell's interplay of urban, peri-urban, rural living, visitor attraction, industrial and agricultural activities.

Submissions

39. Many submissions were received in opposition to the proposed plan change. The Richard Andrew Ford and Mt Difficulty Wines Ltd submissions raise concerns with regard to the proposal's potential adverse effects on landscape character and visual amenity.
40. Mt Difficulty Wines Ltd considers the proposal will result in significant effects on visual amenity with particular regard to the views from their cellar door. I visited Mt Difficulty's Cellar door and viewed the site.
41. Views to the north from Mt Difficulty are elevated and much of the southern portion of the Cromwell Flats are visible (**Image 2**). So too are the rural service structures such as sheds and barns, other winery buildings and rural residential areas. It appears the more urban areas of Cromwell including the Industrial Resource Area are screened from view by the woodlot east of the subject site. When these trees are removed it is likely the balance of Cromwell's urban areas will be largely visible from Mt Difficulty Wines.
42. The proposal will be nearly 2km from the Mt Difficulty cellar door. I consider the proposal will result in a low degree of change of view from Mt Difficulty across what is now a mostly rural and rural residential outlook. The wider panoramic view from the

cellar door will be largely unaffected by the midground views of the proposed urban development. In time, as trees within the development area grow, the built form within the Plan Change area will be softened by vegetation and the visual effect of the development will be reduced to very low.

43. I consider from Mt Difficulty and from other places on the elevated slopes of Bannockburn, the distance of views, access to the wider visible landscape and growing vegetation will allow the proposed development to be well absorbed. I consider in the short term the proposal will result in **low** adverse visual effects from these elevated lands, but in the medium term as trees grow, that effect will reduce to **very low**.
44. I have not visited Mt Difficulty or the surrounding area at night. However I understand Mt Difficulty Wines Ltd and Richard Andrew Ford submit that the proposal will result in adverse effects on visual amenity as experienced at night from the more elevated lands to the south of the subject site. I consider that the proposal will present a more dense urban area and associated clustered lighting which may not be currently present in the night time view. Similarly as stated above it is likely when the woodlot to the east of the site is felled then many of the lights of Cromwell town would be visible. In settled areas I consider lights part of a night time visual amenity. I consider the proposal will result in no more than **very low** adverse effects of the visual amenity as experienced at night.

CONCLUSION

45. The Cromwell Flats are a landscape which displays a mix of urban, peri-urban, rural living, agricultural and visitor attractions and activities within a natural frame of mountains. The proposal seeks to establish a patch of urban development in an area which is somewhat detached from the urban areas of Cromwell Town. The site is generally experienced by users of the three road corridors near the site, the rural living areas adjacent to the site and from some elevated viewpoints.
46. I consider the proposal will increase the urban character elements of the landscape, and will result in a low adverse effect on the landscape character of the site and immediately surrounding lands. The distinct character of the wider Cromwell Flats, which is a mix of rural and urban activities, will be retained and the wider landscape will be affected to a low degree. The site is located where it will result in no more than low adverse visual effects which will decrease to very low as internal trees mature. The proposal will not detract from views of the landscape's more natural enclosing mountains.



Stephen Skelton

Stew Skelton

Registered Landscape Architect

23 April 2019

PLAN CHANGE 13

Landscape Evidence of Stephen Russell Skelton

23 April 2019





-  Indicative extent of the Cromwell Flats Landscape
-  Site boundary
-  Viewing corridor
-  1 Image locations



Image 1. SH6. Image taken with a 24mm equivalent lens, April 9 2019 at 3:35pm. Image is for reference only.

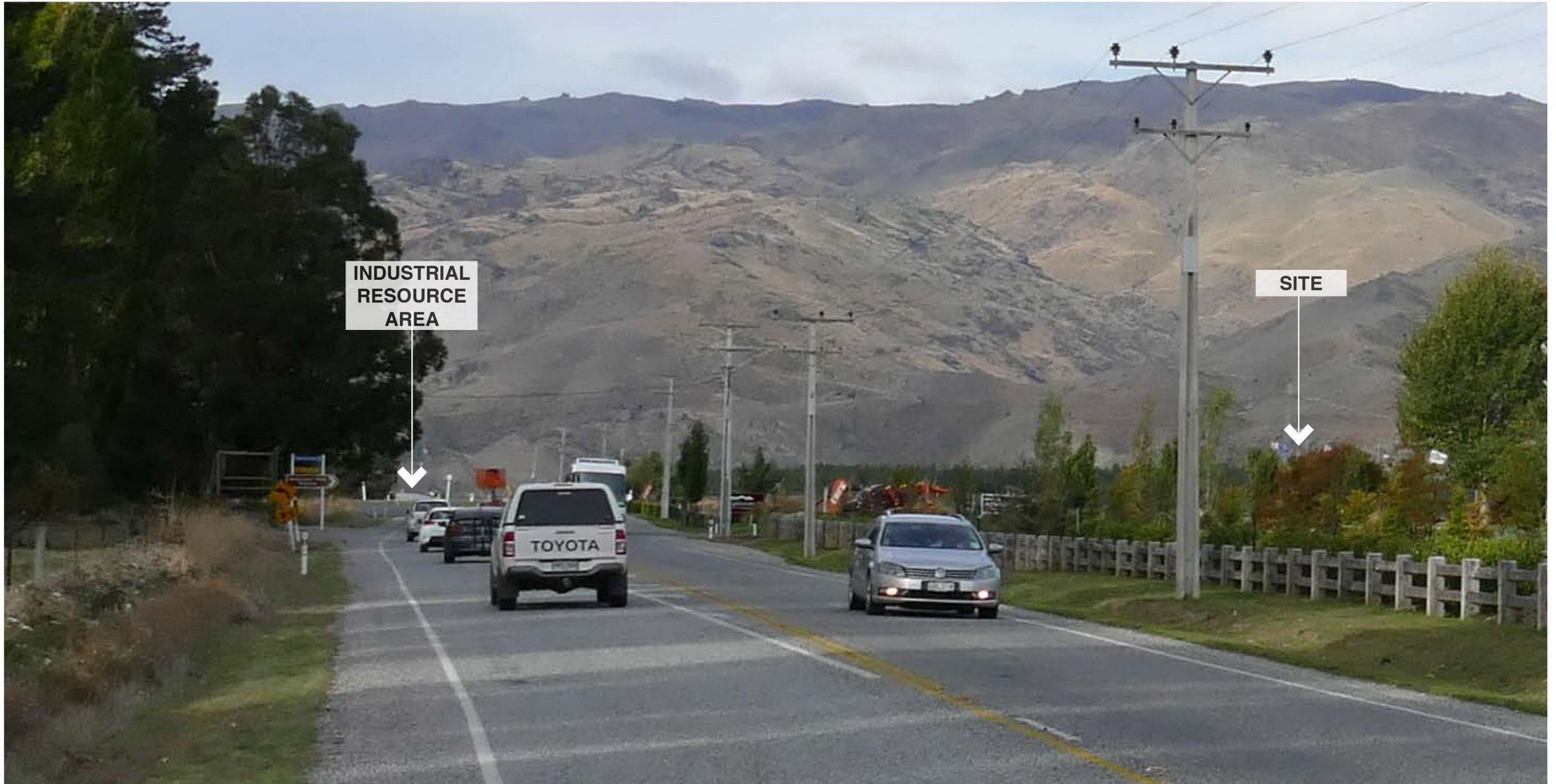


Image 1b. SH6. Image is a zoomed in image taken with a 24mm equivalent lense, April 9, 2019 at 3:35pm. Image is for reference only.



Image 2. From Mount Difficulty Wines Ltd. parking area looking north towards the site. Image is a panorama of 3 images taken with a 24mm equivalent lens, April 9 2019 at 3:17pm. Image is for reference only.



Image 3. From SH6 facing south towards the site. Image is a panorama of 3 images taken with a 24mm equivalent lens, April 9 2019 at 3:33pm. Image is for reference only.



Image 4. Junction of SH6 and Sandflat Road. Image is a panorama of 3 images taken with a 24mm equivalent lens, April 9 2019 at 3:37pm. Image is for reference only.

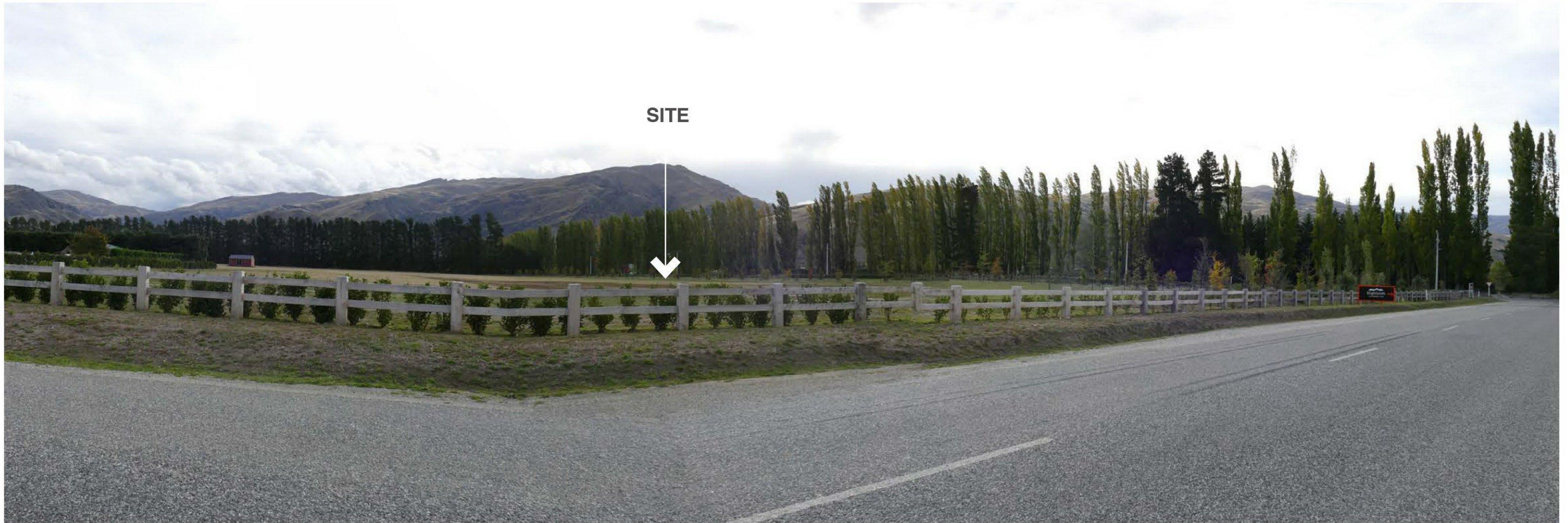


Image 5. North Sandflat Road looking northwest. Image is a panorama of 3 images taken with a 24mm equivalent lens, April 9 2019 at 3:42pm. Image is for reference only.



Image 6. South Sandflat Road looking Northwest towards the site. Image is a panorama of 3 images taken with a 24mm equivalent lens, April 9 2019 at 3:37pm. Image is for reference only.



Image 7. Sandflat Road looking northwest. Image is for reference only. Image is a panorama of 2 images taken with a 24mm equivalent lens, April 9 2019 at 3:37pm. Image is for reference only.



Image 8. Pearsons Road looking northeast towards the site. Image is a panorama of 3 images taken with a 24mm equivalent lens, April 9 2019 at 3:42pm. Image is for reference only.



Image 9. From the Nevis Road looking north towards the site. Image taken with an iPhone 8n 9.4mm equivalent lense on January 2, 2019 at 3:54pm. Image is for reference only.